

November 5, 2008

Norman Hegedus
Aviation Department Environmental Planner
Miami-Dade County Aviation Department
Airside Operations, Building 845, Suite 533
4200 NW 36th St.
Miami, FL 33166

Via Interoffice Mail

Re: INQ 08-171
Landlord Contract with Citrus Health Networks/Homeless Trust
Miami-Dade County Code at Subsection 2-11.1 (c)(2)

Dear Mr. Hegedus:

The Ethics Commission has considered your request for an opinion and found that you have no ethics conflicts that would prevent you from entering into a rental contract with Citrus Health Networks.

We understand that the Miami-Dade County Homeless Trust administers U.S. HUD funds that support the Safe Families program sponsored by Citrus Health Networks. This program provides transitional housing to homeless families who are victims of domestic violence.¹ Through your leasing agreement with Citrus Health Networks, you would provide a rental property to a client-family in the Safe Families program.

You advised the Ethics Commission that you work at the Miami-Dade County Aviation Department as an Aviation Environmental Planner. Your job responsibilities with the Aviation Department do not require your involvement in any aspect of the contract with Citrus Health Networks or the Homeless Trust. Additionally, you have no immediate family members employed by the Homeless Trust.

¹ Telephone conversation with Kimberly Green, Contracts Officer with the Miami-Dade County Homeless Trust, on November 4, 2008.

Please be advised that Subsection 2-11.1 (c)(2) of the Conflict of Interest & Code of Ethics Ordinance allows you to enter into this contract as long as the terms of the contract do not interfere with the full and faithful discharge of your duties to the County; you have not participated in determining the subject contract awards or awarding the contract; and your job responsibilities and job description do not require you to be involved with the contract in any way, including but not limited to its enforcement, oversight, administration, amendment, extension, termination, or forbearance.

This opinion is limited to the facts as you presented them in your email of November 3, 2008, regarding conflicts under Subsection (c) of the Miami-Dade Conflict of Interest and Code of Ethics Ordinance only. Other conflicts, based on directives from your Department or under state law, may apply. If you have additional questions regarding possible conflicts based on your Department directives, contact your Department supervisor or the County Manager's Office. Questions regarding the state ethics laws should be addressed to the State of Florida Commission on Ethics.

Feel free to contact me at (305) 350-0601 if I can be of further assistance.

Sincerely,

VICTORIA FRIGO
Staff Attorney