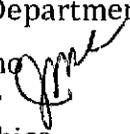


MEMORANDUM

Miami-Dade Commission on Ethics

Date: January 30, 2012

To: Miriam Singer
Assistant Director
Internal Services Department

From: Joseph M. Centorino 
Executive Director
Commission on Ethics

RE: INQ 12-19
Potential conflicts for PM employee re Section 8 landlord contract

You asked about potential ethics conflicts for County employee Amelia M. Cordova-Jimenez who was recently transferred to the Procurement Management Division and who has a contract with the County as a Section 8 landlord.

Ms. Cordova-Jimenez's responsibilities have included managing architectural and engineering services contracts. However, with her transfer, she will also be responsible for purchasing goods and services for the Public Housing and Community Development Department. Section 8 contracts are administered by the Public Housing Agency, a division of the newly formed Public Housing and Community Development Department.

Our Opinion:

The County Code at Sec. 2-11.1 (c) allows Ms. Cordova-Jimenez to enter into a Section 8 landlord contract with the County because she is not employed by the Public Housing Agency, the division within the Public Housing and Community Development Department that administers these contracts. *See Ethics Opinions SEC 06-69, RQO 12-06.*

Additionally, the Ethics Commission has opined that as the landlord of only one rental unit, she is not engaged in outside employment. *See Ethics Opinion RQO 06-48.*

However, Sec. 2-11.1 (n) of the County Code prohibits Ms. Cordova-Jimenez from participating in any official action that would directly or indirectly affect a business in which she or any member of her immediate family has a financial interest. Consequently, Ms. Cordova-Jimenez must avoid tasks within your division that would directly or indirectly affect her Section 8 rental property.

We concur with your assessment that, in order to avoid the appearance of any conflicts of interest, a firewall should be established to isolate employee-landlords with Section 8 contracts from the division that administers the Section 8 programs. We further recommend, and would be happy to assist in, training your employees on maintaining these safeguards.
