

---

**From:** Diaz-Greco, Gilma M. (COE)  
**Sent:** Tuesday, July 22, 2014 3:07 PM  
**To:** Sanchez, Rodzandra (COE)  
**Subject:** FW: Ethics Opinion (Restrictions on Contracting with the County) INQ 14-173  
**Attachments:** INQ 14-173 Harris.pdf; Harris application.pdf

INQ 14-173

---

**From:** Diaz-Greco, Gilma M. (COE)  
**Sent:** Tuesday, July 22, 2014 3:06 PM  
**To:** [otrcl@aol.com](mailto:otrcl@aol.com)  
**Cc:** Centorino, Joseph (COE)  
**Subject:** Ethics Opinion (Restrictions on Contracting with the County) INQ 14-173

Dear Mr. Harris:

Attached is the Section 8 Landlord Ethics Opinion. Please note it indicates that you do not violate relevant sections of the Ethics Code with respect to contracting as a Section 8 landlord with the Housing Agency. You may submit a copy of this letter to the Housing department. You may print the attached letter and submit it to the Housing department. I will send you the original letter via regular mail.

Please do not hesitate to contact me if you have further questions.

Sincerely,

Gilma (Mimi) Diaz-Greco  
Staff Attorney

Gilma (Mimi) Diaz-Greco  
Staff Attorney



Miami-Dade Commission on Ethics and Public Trust  
19 W. Flagler Street, Suite 820  
Miami, FL 33130  
Tel: (305) 579-2594  
Fax: (305) 579-0273  
[gdiazgr@miamidade.gov](mailto:gdiazgr@miamidade.gov)  
[www.facebook.com/MiamiDadeEthics](http://www.facebook.com/MiamiDadeEthics)

*Miami-Dade County is a public entity subject to Chapter 119 of the Florida Statutes concerning public records. E-mail messages are covered under such laws and thus subject to disclosure.*

# MIAMI-DADE COMMISSION ON ETHICS AND PUBLIC TRUST

## COMMISSIONERS

Charlton Copeland, CHAIRMAN  
Nelson Bellido, VICE CHAIR  
Dawn Addy  
Kerry E. Rosenthal  
Judge Lawrence Schwartz



## EXECUTIVE STAFF

Joseph M. Centorino  
EXECUTIVE DIRECTOR  
GENERAL COUNSEL  
Michael P. Murawski  
ADVOCATE  
Miriam S. Ramos  
DEPUTY GENERAL COUNSEL

Via First Class Mail  
and email at: otrcl@aol.com

July 22, 2014

Kenneth Harris  
11828 SW 221 Street  
Miami, FL 33170

*Please submit this letter to the Housing department. The Ethics Commission does not submit this letter on your behalf.*

Re: INQ 14-173 Limitations on Doing Business with the County

Dear Mr. Harris:

On July 1, 2014, you inquired about limitations in contracting with the County. You are a County employee working for the Miami-Dade Public Housing and Community Development department (PHCD) in the **Asset Management** division as a Structural Maintenance Tech. In your employment in the Asset Management division, you are responsible for property maintenance of low income rental properties managed by the County. You would like to enter into a contract with the Miami-Dade County Public Housing and Community Development (PHCD) as a Section 8 landlord.

Because your employment at the PHCD is in a separate division from the CAD, the division that oversees and administers the Section 8 programs, **you do not violate subsections 2-11.1 (c) and (d) of the Conflict of Interest and Code of Ethics Ordinance to contract with the PHCD.**

Generally, the County Ethics Code at Sec. 2-11.1 (c)(2) prohibits County employees from contracting with the division that employs them. In RQO 12-06 however, the Ethics Commission opined that PHCD employees are not prohibited from entering into contracts or continuing contracts as Section 8 landlords as long as they do not work in the CAD division because firewalls have been established that isolate the work of the CAD from other PHCD divisions. Consequently, given that your work in the Asset Management division is separate for CAD, you may enter into contracts with the PHCD as a Section 8 landlord.

Please note that as long as your current or future job responsibilities with the Asset Management division of the PHCD do not require your involvement in any aspect of the contract as described above, you may participate in the Section 8 Landlord program administered by CAD.

This opinion is limited to the facts as you presented them to the Commission on Ethics regarding conflicts under Subsections (c) and (d) 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 Department directives, contact your Department supervisor or the Mayor'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 305 350-0638 if I can be of further assistance.

Sincerely,



Gilma (Mimi) Diaz-Greco  
Staff Attorney

MIAMI-DADE



ETHICS COMMISSION

TO: County employees interested in accepting Section 8 housing vouchers

Generally, County employees may rent residences to tenants who receive Section 8 housing vouchers through the County if the employees and their immediate family members are not employed by the Miami-Dade County Public Housing and Community Development Department (PHCD). If a County employee meets these requirements, written approval to become a Section 8 landlord must be obtained from the Ethics Commission. Please send the following information to the Ethics Commission to receive an approval letter.

Employee's name Kenneth Harris

Department where employee works PHCD

Employee's job title Structural Maint Tech

Employee's preferred mailing address  
(not the address of the rental property) 11828 S.W. 221 St  
street address  
Miami, FL 33170  
city and zip

Employee' daytime phone number 786 205-1273

Employee's preferred email address otrc1@aol.com

Mail, fax, or email this form to—  
 Gilma M. Diaz-Greco, Staff Attorney  
 Commission on Ethics & Public Trust  
 19 W. Flagler St., Suite 820  
 Miami, FL 33130  
 fax (305) 579-0273  
[gdiazgr@miamidade.gov](mailto:gdiazgr@miamidade.gov)

I AFFIRM that I am a County employee not employed by the County Public Housing and Community Development Department, and I would like to accept Section 8 housing vouchers issued to tenants through the County Public Housing and Community Development Department. Additionally, I have no immediate family members employed by the County Public Housing and Community Development Department.

Kenneth Harris  
Signature

7-1-14  
Date

Your ethics opinion will be sent to you by first class mail and email, unless you request another type of delivery.