



Via First Class Mail  
and  
email at [ray1100@bellsouth.net](mailto:ray1100@bellsouth.net)

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January 31, 2012

Sandra Raymond Dadaille, Principal Planner  
Housing and Community Development Department  
701 NW 1<sup>st</sup> Court, 14<sup>th</sup> Floor  
Miami, FL 33136-3924

**Re: RQO 12-06**

Transacting Business with the County  
See Miami-Dade Co. Code at Sec. 2-11.1 (c).

Dear Ms. Dadaille:

In a public meeting on January 24, 2012, the Miami-Dade Ethics Commission opined that you may continue your contract as a Section 8 landlord with the County because the Public Housing Agency, which administers the Section 8 program, remains distinct and separate from the other divisions in the newly enlarged Public Housing and Community Development Department.

In 2005 and again in 2010 you were given permission by the Ethics Commission to contract with the Public Housing Agency as a Section 8 landlord.<sup>1</sup> You were not, and never have been, employed by the Public Housing Agency.

The Public Housing Agency, the General Services Administration and the Housing and Community Development Department (the department that employs you) were recently merged into the newly formed Public Housing and Community Development Department.

As was the case prior to the merger, only employees of the Public Housing Agency administer the Section 8 program.<sup>2</sup> These employees do not discuss their work or share Section 8 files with others outside of the Public Housing Agency.

Consequently, employees of the former GSA or the former Housing and Community Development Department may enter into contracts or continue contracts as Section 8 landlords because firewalls have been

<sup>1</sup> Miami-Dade County Code Sec. 2-11.1 (c)(2) and Ethics Commission Opinions RQO 05-127 and INQ 10-76.

<sup>2</sup> "Section 8 Administrative Plan for the Miami-Dade Public Housing Agency, effective 7/1/11, at <http://www.miamidade.gov/housing/library/sec8/administrative-plan.pdf> (accessed on 1/31/12).

established to isolate the work of the Public Housing Agency from the two other divisions within the expanded department.

This opinion construes the Miami-Dade County Ethics Code and is not applicable to conflicts under other County, municipal or state laws. Inquiries regarding possible conflicts under state law should be directed to the State of Florida Commission on Ethics.

Please feel free to contact me or Victoria Frigo, Staff Attorney, if we can be of further assistance.

Sincerely,



JOSEPH CENTORINO  
Executive Director