From:	Diaz-Greco, Gilma M. (COE)
Sent:	Monday, November 02, 2015 1:24 PM
То:	Sanchez, Rodzandra (COE)
Subject:	FW: Kenneth King, Vice President, Camillus House (Contracting with the County) INQ 15-245

INQ 15-245 King

From: Diaz-Greco, Gilma M. (COE)
Sent: Monday, November 02, 2015 1:22 PM
To: 'Kenneth King'
Cc: Centorino, Joseph (COE); Perez, Martha D. (COE); Montero, Eve (PHCD); Caballero, Alisa L (PHCD)
Subject: Kenneth King, Vice President, Camillus House (Contracting with the County) INQ 15-245

Dear Mr. King:

You inquired about a possible conflict of interest under the County Ethics Code.

As background, you are the Vice President of Housing for Camillus House, Inc., a private not-for-profit organization that provides housing and other services for the homeless. Your primary job responsibility at Camillus House is to manage Camillus' housing properties. You do not serve on any County Boards and you do not have any immediate family members employed by PHCD. You are seeking to participate in the Home-Owners Rehabilitation program, administered by PHCD, which provides funding to eligible homeowners like yourself, to make repairs to their private homes.

You inquired about a possible conflict of interest because you are employed at Camillus House as a Vice President of housing and Camillus House currently receives a Federal Emergency Solutions Grant (ESG) from PHCD. While several of Camillus House's programs are funded through ESG, these funds are earmarked exclusively for homeless programs; and although administered by PHCD, ESG funds are unrelated to the Home-Owner Rehabilitation program you are applying for.

No prohibited conflict of interest exists in this case because the County Ethics Code only applies to County board members, elected officials, and County employees, and their immediate family members. Based on the information you have provided, you do not fit any of the categories of persons covered by the code. We note that if you were covered by the County Ethics code, the facts presented here would not indicate a conflict of interest because neither you nor your immediate family member administer the housing assistance program to which you are applying, and the ESG funds received by Camillus house are completely unrelated to the housing Homeowner's Rehabilitation program you are applying for.

Please contact us if you have further questions.

Best regards,

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 www.facebook.com/MiamiDadeEthics

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From: Kenneth King [mailto:kennethkng4@gmail.com]
Sent: Friday, October 23, 2015 11:17 AM
To: Diaz-Greco, Gilma M. (COE)
Cc: Montero, Eve (PHCD)
Subject: Ethic Opinion

This is in reference to PHCD's Home Rehabilitation Loan Program :

I am the Vice President Housing for Camillus House, Inc, a not-for-profit organization that provides housing and other services for the homeless, mentally challenged and those affected by substance addiction. We have several housing programs in my department funded through PHCD. I do not participate in any grant writing processes, nor do I sit on any county boards or PHCD boards and have absolutely no influence in PHCD's decision making processes or operations, neither am I a county employee. My primary duty here at Camillus House is to manage all housing properties regardless of funding source. I stand neutral with respect to obtaining funding from any source other than donations for our housing programs. The bottom line is that I am a private citizen working for a private not-for-profit organization that has some interactions with PHCD.

Please feel free to contact me if there are any further questions.

Regards, Kenneth E. King 305.979.6945