
From: Diaz-Greco, Gilma M. (COE)
Sent: Wednesday, March 11, 2015 3:40 PM
To: Sanchez, Rodzandra (COE)
Subject: FW: Manny Sarria, Deputy Director, Miami-Dade County Homeless Trust, (reverse 2 year rule) INQ 15-35

INQ 15-35 Sarria

From: Diaz-Greco, Gilma M. (COE)
Sent: Wednesday, March 11, 2015 3:40 PM
To: Sarria, Manuel (HT)
Cc: Centorino, Joseph (COE)
Subject: Manny Sarria, Deputy Director, Miami-Dade County Homeless Trust, (reverse 2 year rule) INQ 15-35

Dear Mr. Sarria:

You asked if the Ethics Code prevents you from serving on the Selection Committee for Home/ESG Request for Applications.

As background, the County Public Housing and Community Development Department (PHCD) has asked you to participate on the selection committee referenced above. This committee is reviewing Request for Applications (RFAs) from entities that apply for HUD funds administered by the PHCD and Homeless Trust to provide housing assistance to previously homeless individuals.

You were employed by Citrus Health Network for a period of 18 years ending on June 6, 2014. Citrus Health Network has a housing division and they have previously applied for and received the types of funding for which the Home/ESG selection committee is reviewing RFA's.

Section 2-11.1 (x) of the County Ethics Code prevents you from performing **any** County contract related duties regarding Citrus Health Network (CHN), for two years following your employment with CHN. See RQO 11-14.

Pursuant to Section 2-11.1 of the County Ethics Code, contract related duties include:

“service as a member of a county certification, evaluation, **selection**, technical review or similar committee...”
(Emphasis added)

Consequently, pursuant to Section 2-11.1(x) of the County Ethics Code, you may not serve on any selection committee for Home/ESG where CHN is applying for HOME/ESG funding for two years following your employment with CHN.

We further advise that an appointment to a selection committee reviewing a CHN application for funding shortly after the two-year proscription, although not strictly prohibited by the Ethics Code, may create an appearance of impropriety. See INQ 12-62.

The foregoing construes the Miami-Dade County Ethics Code only and is not applicable to conflicts under other County or state laws.

Sincerely,

Gilma (Mimi) Diaz-Greco

Staff Attorney



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From: Sarria, Manuel (HT)
Sent: Friday, February 20, 2015 9:06 AM
To: Diaz-Greco, Gilma M. (COE)
Subject: Re: Request for Opinion

Homeless Trust staff advised me of the procedure verbally. I'm looking for a written opinion for the first time.

From: Diaz-Greco, Gilma M. (COE)
Sent: Friday, February 20, 2015 8:53 AM
To: Sarria, Manuel (HT)
Subject: RE: Request for Opinion

Mr. Sarria:

Joseph Centorino has referred this matter to me. In your email you state that you were advised you were not allowed to participate in Selection Committees organized by the Homeless Trust to review responses to Requests for Applications for new or renewal funding, for two years. Did you obtain a letter of opinion from the Ethics Commission to this effect? If so, would you please send me the Opinion number?

Best regards,

Gilma (Mimi) Diaz-Greco
Staff Attorney



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From: Ethics (COE)
Sent: Thursday, February 19, 2015 4:48 PM
To: Diaz-Greco, Gilma M. (COE)
Subject: FW: Request for Opinion

Please handle.

From: Sarria, Manuel (HT)
Sent: Thursday, February 19, 2015 4:47 PM
To: Ethics (COE)
Subject: Request for Opinion

I was employed by Miami-Dade County to work with the Homeless Trust in June 2014. Prior to working with the County I was employed by Citrus Health Network, a subrecipient of Miami-Dade County Homeless Trust funds, for eighteen years. I was advised I was not allowed to participate in Selection Committees organized by the Homeless Trust to review responses to Requests for Applications for new or renewal funding, for two years. I am currently being asked by PHCD to participate in their Selection Committee for the HOME/ESG Request for Applications. My assumption is I still have a conflict because potentially Citrus can apply for funding, please advise?

Manny Sarria, Deputy Director
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111 N.W. 1st Street, 27th Floor, Miami, Florida 33128
305.375.5739 Office 305.375.2722 Fax
www.miamidade.gov

If you or someone you know is Homeless or about to become homeless, please call the Homeless Helpline at 1-877-994-HELP. If you are seeking affordable housing, or additional information, please visit us on the Web at www.miamidade.gov/homeless.

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