

Sanchez, Rodzandra (COE)

From: Diaz-Greco, Gilma M. (COE)
Sent: Friday, September 01, 2017 3:34 PM
To: Sanchez, Rodzandra (COE)
Subject: FW: Brenda Molina, Applicant Second Mortgages Program, PHCD Limitation on transacting business with the County) INQ 17-222
Attachments: county_emps__relatives_seeking_housing_assist_8-15-signed.pdf

[INQ 17-222 Molina](#)

From: Diaz-Greco, Gilma M. (COE)
Sent: Friday, September 01, 2017 3:33 PM
To: 'Brenda Lee' <brendamlee0909@yahoo.com>
Cc: Centorino, Joseph (COE) <Joseph.Centorino@miamidade.gov>; Murawski, Michael P. (COE) <Michael.Murawski@miamidade.gov>; Perez, Martha D. (COE) <Martha.Perez2@miamidade.gov>; Turay, Radia (COE) <Radia.Turay@miamidade.gov>
Subject: Brenda Molina, Applicant Second Mortgages Program, PHCD Limitation on transacting business with the County) INQ 17-222

Dear Ms. Molina:

You have inquired about limitations in contracting with Miami-Dade County. You advise that while you are not a County employee, your sister-in-law, Marcene Lee, is employed as a Police Officer by the Miami-Dade County Police Department.

You would like to contract with the Miami-Dade County Public Housing and Community Development (PHCD) to participate in the [Home-Ownership Second Mortgages Program](#).

The Miami-Dade County Ethics Code at Section 2-11.1 (c)(5)(5) provides that County employees and their **immediate family members** who are otherwise eligible for assistance through PHCD are permitted to seek such assistance, as long as the County employee does not administer the program. The County Ethics Code at Section 2-11.1(b)(9) defines the term "immediate family member" as "spouse, domestic partner, parents, stepparents, children and stepchildren". Under the County Ethics Code, a sister in law is not included in the definition of immediate family member. Furthermore, Marcene Lee, your sister-in-law, is not employed by PHCD and has no oversight or administrative duties with respect to the Second Mortgages program.

Consequently, based on the facts presented here, nothing in the County Ethics Code prohibits you from participating in the Home-Ownership Second Mortgages Program administered by PHCD.

This opinion is limited to the facts as you presented them to the Commission on Ethics regarding conflicts under Subsections (c) and (b) of the Miami-Dade Conflict of Interest and Code of Ethics Ordinance only. Other conflicts, based on directives from the County employee's Department or under state law, may apply. If you have additional questions regarding possible conflicts based on Department directives,

contact the County employee's Department supervisor or the Mayor's Office. Questions regarding the state ethics laws should be addressed to the State of Florida Commission on Ethics.

Please submit this email to PHCD, the Ethic Commission does not submit it on your behalf.

Cordially,

Gilma (Mimi) Diaz-Greco
Staff Attorney



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From: Brenda Lee [<mailto:brendamlee0909@yahoo.com>]
Sent: Wednesday, August 30, 2017 11:05 AM
To: Diaz-Greco, Gilma M. (COE) <Gilma.Diaz-Greco@miamidade.gov>
Cc: Herrera, Divina (PHCD) <DIVIN@miamidade.gov>
Subject: Ethics Clearance: Sister In-law

Good Morning,

Thank you for speaking with me earlier. I have attached the signed form. Kindly confirm that no further action is needed as my sister-law is not considered an immediate family member.

Thank you,
Brenda Molina
305-281-4692