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INSPECTOR GENERAL

**ARDYTH WALKER**  
STAFF GENERAL COUNSEL

September 10, 1999

[REDACTED]  
Office of the County Manager  
111 N.W. First Street  
Suite 2910  
Miami, FL 33128

**RE: REQUEST FOR ADVISORY OPINION 99-35**

Dear [REDACTED]

The Commission on Ethics and Public Trust considered your request for an advisory opinion at its meeting on September 9, 1999 and rendered its opinion based on the facts stated in your letter.

You requested an opinion regarding your daughter and son-law's ownership of Section 8 property.

In your letter, you advised the Commission that your daughter and son-in-law are the sole owners of property that is currently being leased to a Section 8 tenant. Your areas of responsibility include management oversight for the Miami-Dade Housing Agency.

The Commission found that The Conflict of Interest and Code of Ethics ordinance prohibits your daughter from contracting with the county to provide Section 8 housing. Section 2-11.1(c) provides that no employee or his or her immediate family" shall enter into a contract or transact any business in which he or a member of his immediate family has a financial interest, direct or indirect with Miami-Dade County or any person or

agency acting for Dade County and any such contract, agreement or business engagement entered in violation of this subsection shall render the transaction voidable." Immediate family is defined as spouse, parents and children. Since Section 8 landlords execute contracts with the Miami-Dade Housing Agency, your daughter may not participate in the program.

If you have any questions regarding the opinion, please call the undersigned at (305) 579-2954 or Ardyth Walker, Staff General Counsel at (305) 579-2653.

Sincerely Yours,

A handwritten signature in cursive script, appearing to read "Robert Meyers", with a long horizontal flourish extending to the right.

ROBERT MEYERS  
Executive Director