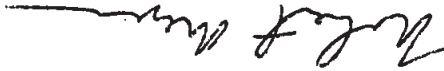


This opinion construes the Miami-Dade
Conflict of Interest and Code of Ethics
ordinance only and is not applicable to any
conflict under state law. Please contact the
State of Florida Commission on Ethics if you
have any questions regarding possible
conflicts under state law.

If you have any questions regarding this
opinion, please call the undersigned at (305)
579-2594 or Ardyth Walker, Staff General
Counsel at (305) 579-2653.

Sincerely yours,



ROBERT MEYERS

Executive Director



ETHICS COMMISSIONERS

Kerry E. Rosenthal, Chairman
Gail Dotson
Guillermo Grenier
Elizabeth M. Iglesias
Robert H. Newman

ROBERT A. MEYERS
EXECUTIVE DIRECTOR

MICHAEL P. MURAWSKI
ADVOCATE

ARDYTH WALKER
STAFF GENERAL COUNSEL

January 10, 2002

Jerry Flick
President
The Housing League, Inc.
11100 Killian Park Road
Miami, FL 33156

RE: REQUEST FOR ADVISORY OPINION 01-141

Dear Mr. Flick:

The Commission on Ethics and Public Trust considered your request for an advisory opinion at its meeting on January 9, 2002 and rendered its opinion based on the facts stated in your letter.

You requested an opinion regarding your ability to contract with the county to provide housing for low and moderate-income families.

In your letter, you advised the Commission that you are a developer of affordable family homes for low and moderate-income homebuyers. You would like to participate in the county's infill housing program with a partnership between your non-profit company and your for-profit housing development company. The Housing Agency is concerned that the arrangement might create conflicts of interest.

The Commission found that your request concerns matters outside of the Conflict of Interest and Code of Ethics ordinance. Therefore, the Commission declined to issue an opinion in this matter.