



**Miami-Dade Commission on Ethics & Public Trust**

**Investigative Report**

**Investigators: Nilda Olmo**

<b>Case:</b> K18-11	<b>Case Name:</b> Dooling--Aviation	<b>Date Opened:</b> 02/20/18	
<b>Complainant(s):</b> Evelyn Campos Division Director, Professional Compliance Miami-Dade County Aviation Department	<b>Subject(s):</b> Daniel Dooling	<b>CASE CLOSED</b> Date: 3/22/18	

**Allegation(s):**

COE received information from the Miami-Dade County Aviation Division Director Evelyn Campos (Campos) regarding Daniel Dooling (Dooling), Senior Aviation Manager. Dooling is employed as a Property Manager for tenants in the Aviation Department at Miami Executive Airport (MEA). Outside employment was approved for his secondary job as a Realtor.

Campos contacted the COE after receiving a complaint from a tenant at MEA, following a dispute stemming from Dooling providing his services as Realtor to the tenant and representing the tenants in the purchase of a home. During the representation, a disagreement regarding sales commission led to Dooling filing a lawsuit against the tenant, in which Dooling prevailed. Thereafter, Campos indicated, the Department received the complaint against Dooling.

As a result of the complaint, the Aviation Department contacted COE to determine whether Dooling violated our Ethics Code, by having an MEA tenant as a customer in his private realtor business.

**Relevant Law:**

Miami-Dade County Conflict of Interest and Code of Ethics Ordinance, Sec. 2-11. (g) *Exploitation of official position prohibited.* No person included in the terms defined in Subsection (b)(1) through (6) and (b)(13) shall use or attempt to use his or her official position to secure privileges or exemptions for himself or herself or others except as may be specifically permitted by other ordinances and resolutions previously ordained or adopted or hereafter to be ordained or adopted by the Board of County Commissioners.

**Investigation:**

**Evelyn Campos**  
**Division Director of Professional Compliance Division**  
**Miami-Dade County Aviation Department**

Campos was contacted and interviewed regarding the allegations. Campos explained that part of Dooling's responsibilities was to monitor compliance with the lease terms and Airport policies. As Property Manager and representative of the Department, he oversees property and facility matters thus allowing Dooling to maintain a continuing relationship with Airport tenants.

As part of the Department's requirement, Dooling's position requires having experience in real estate and commercial property management. Due to Dooling maintaining an active real estate license, he requested permission for outside employment, which was granted in 2015 and subsequently for the last two years.<sup>1</sup>

Campos indicated a tenant from the MEA, where Dooling is assigned, contacted the Department with a complaint about Dooling. Dooling acted as the Realtor for the tenant in the purchase of a private home. The tenants accepted his offer but the transaction ultimately led to a dispute where Dooling had to file a lawsuit against the tenants to obtain his commission, resulting in a settlement agreement.

<sup>1</sup> Request For Outside Employment: 2015, 2016 and 2017.

During the initial stages of the investigation, Campos contacted this investigator and advised that Dooling resigned from his position with the County. The Employment Resignation Form was requested and provided by Campos.<sup>2</sup> As of 03/21/18, Dooling was no longer employed by the County.

**Document Review:**

- Request for Outside Employment (2015-2017).
- Miami-Dade County Employment Resignation Form.

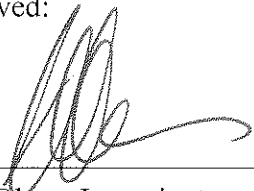
**Conclusion:**

After discussion with the Ethics Advocate it was decided that in light of Dooling's resignation from the County, this matter would be closed with no further action.

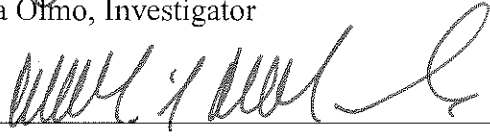
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<sup>2</sup> Employment Resignation Form, dated 03/07/18, effective date of resignation 03/21/18.

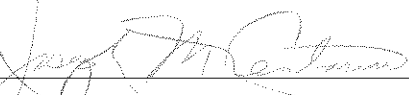
Approved:



Nilda Olmo, Investigator



Michael Murawski, Advocate



Joseph M. Centorino, Executive Director

3/24/18  
Date