

**Frigo, Victoria (COE)**

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**From:** Frigo, Victoria (COE)  
**Sent:** Wednesday, October 07, 2009 11:14 AM  
**To:** 'businessgpc@aol.com'  
**Subject:** INQ 09-161 HAND program presents a conflict of interest

Dear Mr. Garland Curry,

You asked if entering into a contract with the Miami-Dade County Public Housing Agency and/or the Miami-Dade Community Action Agency would create a conflict of interest for you, based on your mother's position with the County as an Assistant County Manager. The program you were considering applying for is the "Housing Assistance Network of Dade" (HAND)—a federally funded program administered by Miami-Dade County.

As we discussed on the phone yesterday, because your mother's position with the County falls within the definition of "departmental personnel," the County Ethics Code prohibits you (and all of your mother's immediate family members) from entering into any contract with any department within the County. See County Code § 2-11.1 (c)(1).

This prohibition can only be waived by the Board of County Commissioners with a 2/3 vote at a public hearing. The process for obtaining a waiver is described in the County Code at § 2-11.1 (c)(4).

Thank you for presenting your question to us. Please feel free to contact me if I can be of further assistance.

Sincerely,

Victoria Frigo, Staff Attorney  
 Miami-Dade County Commission on Ethics  
 Direct Phone: 305.350.0601  
 Fax: 305.579.0273



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-----Original Message-----

**From:** Garland Curry [mailto:businessgpc@aol.com]  
**Sent:** Monday, October 05, 2009 12:00 PM  
**To:** Meyers, Robert (COE)  
**Subject:**

Mr. Reyes,

I am inquiring to know if there would be a conflict of interest if a potential renter wanted to use the program called the Housing Assistance Network of Dade (HAND). This program uses the county to inspect the premises and disperse the federally funds for move in fees and a deposit. The question is I am managing the apartment building and my father is actually listed as the Landlord of the premises. My mother is a Senior Officer Assistant County Manager one of her duties is to oversee the Miami Dade Housing agency. Would this be a conflict of interest?

10/7/2009