



Via First Class Mail
and
email at w9898@miamidade.gov

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March 22, 2010

Taquan L. Williams
Miami-Dade County Housing Finance Authority
1 SE 3rd Ave., Suite 1100
Miami, FL 33131

INQ 10-61 Tax-Exempt Bond Homeownership Program Participation

Dear Ms. Williams:

You asked if any ethics conflicts prevent you from applying for a mortgage through the Tax-Exempt Bond Homeownership Program offered through the Miami-Dade County Housing Finance Authority (HFA). You are employed by HFA as an Administrative Officer III.

According to the Director of HFA, Patricia Braynon, you provide support to the HFA staff, including limited, nondiscretionary assistance related to the Tax-Exempt Bond Homeownership Program.¹ Additionally, all loans obtained through the program are processed by third party lenders, not employees of HFA.

The Miami-Dade County Ethics Code at Sec. 2-11.1 (c) allows HFA employees to obtain single-family mortgage loans through HFA programs as long as the employees are eligible and they do not participate in administering the program:

(5) Nothing herein shall prohibit or make illegal ... (6) an application to participate in a single-family mortgage loan program sponsored by the Housing Finance Authority of Miami-Dade County ... submitted by a County person ... [who] would but for this section be eligible for participation in said program; provided, however, that the exception provided in this paragraph shall not extend to an employee of the Miami-Dade County Finance Department who participates in the administration of said single-family mortgage loan program.

Consequently, the Ethics Code does not prevent you from participating in the Tax-Exempt Bond Homeownership Program offered through HFA if you meet the criteria.

Sincerely,


VICTORIA FRIGO
Staff Attorney

Copy: Patricia Braynon at p.braynon@miamidade.gov

¹ Email dated 3/4/10.