



Via Interoffice Mail  
and email at [wpupo@miamidade.gov](mailto:wpupo@miamidade.gov)

December 4, 2012

**ETHICS COMMISSIONERS**

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ADVOCATE

**MIRIAM S. RAMOS**  
DEPUTY GENERAL COUNSEL

William L. Pupo, Real Estate Officer  
Miami-Dade County Internal Services Department  
111 NW 1<sup>st</sup> Street  
Miami, FL 33128

Re: INQ 12-212  
Daisy and Pedro Lagos' Home Purchase through NSP  
See Miami-Dade County Ethics Code at Sec. 2-11.1 (c)(2)

Dear Mr. Pupo:

The County Ethics Code allows County employees Daisy and Pedro Lagos to purchase a home owned by the County with financial assistance through the Neighborhood Stabilization Program (NSP).


You've stated that Daisy Lagos and Pedro Lagos are each employed by the Miami-Dade County Public Works and Waste Management Department (PWWM) as clerks. They have qualified as an affordable housing family to participate in the NSP program.

As clerks with PWWM, Daisy and Pedro Lagos meet all the requirements to participate in the NSP program and contract with the County as defined in the County Ethics Code at Sec. 2-11.1 (c)(2). They have not been involved in awarding the NSP funds or determining the terms of the real estate contract. Furthermore, receiving NSP funds and entering into the real estate contract do not interfere with the full and faithful discharge of their duties to the County. Their job responsibilities do not involve enforcement, oversight, administration, amendment, extension, or termination of their NSP grant or their real estate contract. And finally, Mr. and Mrs. Lagos do not work for the Public Housing and Community Development Department or ISD, the departments that will administer and execute their NSP award and real estate contract with the County.

Consequently, Daisy and Pedro Lagos may enter into the real estate contract with NSP funds because they have not been, nor will they be, involved with any aspect of the NSP award or the real estate contract.

If you have additional questions, please feel free to contact me at 305 350-0601.

Sincerely,

  
VICTORIA FRIGO  
Staff Attorney