
From: Diaz-Greco, Gilma M. (COE)
Sent: Tuesday, July 15, 2014 10:54 AM
To: Sanchez, Rodzandra (COE)
Subject: FW: Tiffani Page- Ethics Opinion (Conflict of Interest- Outside Employment) INQ 14- 168

INQ 14-168

From: Diaz-Greco, Gilma M. (COE)
Sent: Tuesday, July 15, 2014 10:54 AM
To: Page, Tiffani (PHCD)
Cc: Centorino, Joseph (COE)
Subject: Tiffani Page- Ethics Opinion (Conflict of Interest- Outside Employment) INQ 14 168

Dear Ms. Page:

You have inquired regarding possible limitations or conflicts of interests relating to your County employment in the Miami-Dade Public Housing and Community Development department (PHCD) and your outside employment for a church that is entering into an agreement with a developer of low-income housing who will be applying for a housing grant(s) from PHCD.

As background, you advise that you are currently employed with PHCD as an Accountant 3, in the Finance Division. Your job responsibilities include reviewing, posting transactions, and reconciling items in PHCD's general ledger. You are also engaged in outside employment as the Chief Financial Officer/Financial Secretary at St. James AME Church of Miami, Inc. (AME), where you are a member. Your job responsibilities mostly involve bookkeeping and you advise that you do not make major decisions in regards to the Church operations. You have followed the County requirements for outside employment and have requested and received permission to engage in outside employment with AME. Other than the salary that AME pays you for the accounting work you perform for them, you do not have any other financial interest in the church. AME is entering into a partnership with Carrfour Supportive Housing, Inc. (Carrfour) to develop a low-income housing project (Supportive Housing Project) on land provided by AME on a lease-hold basis. Carrfour is a non-profit corporation registered in the State of Florida which uses government grants and subsidies to develop and manage affordable housing units across Miami-Dade County. Carrfour has applied to the PHCD for a Community Development Block Grant (CDBG) to finance all or part of the housing development on the AME land.

While we find no clear conflict of interest based on the facts presented here, there are some limitations set out in the County Code of Ethics that you should follow. Your supervisor confirms that you do not review any applications or requests for funding, and you do not make any award recommendations for any of PHCD's funding. You are not responsible for overseeing or making final decisions on the Church's partnership with Carrfour, and you do not stand to personally benefit from AME's partnership with Carrfour. In addition, it is not AME (your outside employer) but rather Carrfour that is seeking to contract with the County by applying for the CDBG. Consequently, no clear conflict of interest exists under the County Ethics Code. See County Ethics Code at Section 2-11.1(j). Nevertheless, in order to avoid the possibility of exploitation of official position you should not administer or oversee any aspect of a grant administered by PHCD that AME or Carrfour would apply for, either currently or in the future. See County Ethics Code at Section 2-11.1(g). We also advise that in order to avoid an appearance of impropriety you should refrain from managing, administering or participating in the Supportive Housing Project in any way when you are in your outside employment with AME. You also must avoid disclosing to AME or Carrfour any confidential information regarding any of their dealings with the County that you may obtain as a result of your County employment. See County Ethics Code at Section 2-11.1(h).

This opinion is based on the facts presented. If any of the facts change, please contact us. Please note that 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. Inquiries regarding possible conflicts under state law should be directed to the State of Florida Commission on Ethics.

Best regards,

Gilma (Mimi) Diaz-Greco
Staff Attorney



Miami-Dade Commission on Ethics and Public Trust

19 W. Flagler Street, Suite 820

Miami, FL 33130

Tel: (305) 579-2594

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From: Page, Tiffani (PHCD)

Sent: Tuesday, July 08, 2014 11:42 AM

To: Diaz-Greco, Gilma M. (COE)

Subject: RE: Request for Opinion

Hi Mrs. Diaz-Greco,

I have no personal financial interest in St. James (Church). When I attend services I do give my monetary tithes and offerings, time and talents through the ministries I am involved at the Church (i.e. dance, choir, etc.).

I assist with others to count the money that is collected from members/visitors who attend the Church services on Sundays/Weekdays (if applicable). That money, once totals are verified, is then turned over to the Church's Treasurer for deposit. I received those deposit slips and verify the amounts against the Church's reports to make sure the funds were deposited in the Church's bank account. The funds collected are how the Church's bills/obligations are paid. I process/cut checks for all of the Church's bills/obligations but am not authorize to sign any checks. Though I account for the money on paper, I am not authorize to make bank deposits/correspondences or sign any checks processed/cut, as my duties are segregated from those activities. My work is on the line of bookkeeping. All major decisions made in regards to the Church operations is done at the recommendation of the Church's Stewardship & Finance Commission and approval of the Church's Official Board (which includes the entire church membership body, majority vote).

My income does not tie to and will not be affected by the partnership. My pay is best only the work I do for the Church. My financial assistance to the Church began on a voluntary no pay bases in 2005 and remained such for over a year before the Official Board recommended and approved a small pay stipend in 2006 based on my work ethic. Below is my duties as listed on my resume as the CFO at the Church:

ST JAMES AMEC of Miami, Inc.- Miami, FL

Stewardship and Finance Commission

Chief Financial Officer - December 2006 to Present

Apply established not-for-profit accounting principles and methods in the preparation and analysis of financial data and statements.

- Assist in the composition and development of financial policies and procedures for the processing of checks and deposits, receipt of contributions, and maintenance of other financial information within the limits of not-for-profit and Internal Revenue Services (IRS) guidelines.
- Monitor bank and general ledger accounts; analyze budget in the maintenance of spending limits; and review vendor transactions and process payments through established accounts payable procedures.
- Prepare monthly Statement of Financial Position, Statement of Activities, Statement of Functional Expenses, and Bank Reconciliations; and perform other related duties as required.

I hope this brings clarity.

Thanks,

Tiffani Page

Miami-Dade Public Housing and Community Development

701 NW 1st Court, 16th Floor

Miami, FL 33136

Phone: (786) 469-4185 Fax: (786) 469-4199

E-mail: tiffani@miamidade.gov

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From: Diaz-Greco, Gilma M. (COE)

Sent: Tuesday, July 08, 2014 10:55 AM

To: Page, Tiffani (PHCD)

Subject: RE: Request for Opinion

Ms. Page,

I am working on your opinion and needed additional information. I understand that you are engaged in outside employment as Chief Financial Officer/Financial Secretary at St James AME Church of Miami, Inc., (AME). I wanted to inquire whether you have any personal financial interest in AME or whether the income that you receive from AME would in any way be affected by the partnership between AME and Carrfour.

Thank you and best regards,

Gilma (Mimi) Diaz-Greco
Staff Attorney



Miami-Dade Commission on Ethics and Public Trust
19 W. Flagler Street, Suite 820
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From: Page, Tiffani (PHCD)
Sent: Thursday, May 22, 2014 4:25 PM
To: Diaz-Greco, Gilma M. (COE)
Cc: Saydal-Hamilton, Mari (PHCD); Anderson, Michael (PHCD); Caballero, Alisa L (PHCD); Farr, Gerald (PHCD)
Subject: Request for Opinion

Hi Mrs. Diaz-Greco,

Hope all is well this day. I have an ethics concern and was directed that it would need to be addressed to the Ethics Commission. Therefore, please find attached a memo for a Request of Opinion. Your assistance in this matter is greatly appreciated. If additional documentation is needed, please do not hesitate to contact me via the contact information below or within the attached memo.

Thanks and continue to have an awesome day,

Tiffani Page
Miami-Dade Public Housing and Community Development
701 NW 1st Court, 16th Floor
Miami, FL 33136
Phone: (786) 469-4185 Fax: (786) 469-4199
E-mail: tiffani@miamidade.gov

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May 22, 2014

Tiffani Page (Employee# 00201598)

Office: 701 NW 1st Court, 16th Floor Miami, FL 33136 (786) 469-4185

Home: 1794 SW 82 Place Miramar, FL 33025 (850) 321-3730

Subject: Request for Opinion

Miami-Dade County Commission on Ethics and Public Trust
19 West Flagler, Suite 820
Miami, FL 33130

To the Commission:

I need clarity into a possible ethics concern. I am currently employed with Miami-Dade Public Housing and Community Development (PHCD), as an Accountant 3, in the Finance Division. In addition, I have documented and approved outside employment as the Chief Financial Officer/ Financial Secretary at St James AME Church of Miami, Inc., where I am a member as well. My concern is that my church will be possibly pursuing a partnership with CarrFour Supportive Housing (CarrFour) to provide housing and social services within the community where my church is located. To do so they wish to take lease-hold of a partial of our land for the development. They provided a presentation to the membership body, at a church conference on the night of Tuesday, March 20, 2014, of what they do, their current properties and its funding sources, and what they were requesting of the church (i.e. use of our land).

I am a member and employee, and as stated I hold a financial and leadership position at the church. In the future, once all feasibility planning and so forth has been done, CarrFour will request funding from PHCD to fund this endeavor. While I do not work in the negotiations/ approval process of CarrFour qualifying and receiving funds for said project, I want to make sure it is not a conflict of interest as I work at PHCD in a financial position. I do not believe it is a conflict of interest but I am uncertain to the facts. I want to make sure I address the issue before anything is initiated and finalized with this partnership between my church and CarrFour, so that any action that needs to be taken on my part is executed in a timely manner.

I addressed this concern with my supervisor as well as the human resource personnel within PHCD on the morning of Wednesday, March 21, 2014, and as directed, I seek an ethics opinion from the commission. Thanks in advance for your assistance in this matter. My contact information has been provided above.

Sincerely,



Tiffani S. Page

cc: Mari Saydal-Hamilton
Michael Anderson
Alisa L. Caballero
Gerald Farr