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**From:** Diaz-Greco, Gilma M. (COE)  
**Sent:** Monday, April 07, 2014 2:07 PM  
**To:** Caballero, Alisa L (PHCD)  
**Cc:** Centorino, Joseph (COE)  
**Subject:** Ethics Opinion-Housing Assitance INQ 14-88

INQ 14-88

Ms. Caballero,

The Miami-Dade Conflict of Interest and Code of Ethics Ordinance (Ethics Code) allows Willna Fenelon, employed as a Police Dispatcher for the Miami-Dade County Police Department to accept assistance through a homeowner's program administered by the Public Housing and Community Development department (Housing department).

Although the Ethics Code generally places restrictions on County employees from contracting with the County, an exception provided in the Ethics Code at Sec. 2-11.1 (c)(5)(5), allows County employees as well as their immediate family members to participate in housing programs if they are otherwise eligible. **See also**, Ethics Opinion RQO 09-20.

Consequently, Ms. Fenelon may participate in a homeowner's assistance program administered by the Housing department if she otherwise qualifies for the program; and as long as during the entire term of the loan, her job responsibilities do not require her to participate in administering the loan.

This opinion is limited to the facts as you presented to the Commission on Ethics regarding conflicts under Subsections (c)(5)(5) of the Ethics Code only. Other conflicts, based on County department directives or under state law, may apply. Questions regarding possible conflicts based on Department directives should be referred the Department supervisor or the Mayor's Office. Questions regarding the state ethics laws should be addressed to the State of Florida Commission on Ethics.

If you have additional questions, please feel free to contact me.

Sincerely,

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:** Caballero, Alisa L (PHCD)  
**Sent:** Wednesday, March 26, 2014 11:30 AM  
**To:** Diaz-Greco, Gilma M. (COE)  
**Cc:** Saydal-Hamilton, Mari (PHCD); Santamaria, Mayra C. (PHCD); Edwards, Julie (PHCD); Flanders, Pamela (PHCD);  
Montero, Eve (PHCD); Jones, Ronald (PHCD)  
**Subject:** FW: County employee

Hi Mimi:

Here is an additional County employee under the Beautification Program for your review and opinion.  
Thanks.

<< OLE Object: Picture (Device Independent Bitmap) >>

**Alisa L. Caballero**  
**Quality and Assurance Officer**  
**Administrative Services Division**  
**Public Housing and Community Development**  
**701 NW 1st Court, 16th Floor**  
**Miami, Florida 33136**  
**Phone: 786-469-2100**  
**786-469-2168**  
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**From:** Montero, Eve (PHCD)  
**Sent:** Wednesday, March 26, 2014 11:17 AM  
**To:** Caballero, Alisa L (PHCD); Flanders, Pamela (PHCD)  
**Subject:** County employee

<< File: 201403261117.pdf >>

Alisa,

I have another Homeowner who has applied for the Surtax Beautification Program. Her name is Ms. Willna Fenelon, Police Dispatcher employed by Miami-Dade County. Attached is executed Employee Disclosure Statement form.

Thank you,

***Eve Montero, Homeownership Specialist***  
***Miami-Dade County Department of Housing and Community Development***  
701 NW 1st Court .14th Floor . Miami, Florida 33136  
786-469-2194 Phone - 786-469-2236 Fax  
Email: [mtr@miamidade.gov](mailto:mtr@miamidade.gov)

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MIAMI-DADE COUNTY, FLORIDA  
Department of Public Housing & Community Development  
701 NW 1st Court, 14th Floor  
Miami, Florida 33136

**DISCLOSURE STATEMENT**

Date: \_\_\_\_\_

3/19/2014

I/We \_\_\_\_\_

Willna FENELON  
Applicant/Co-Applicant

am not related by blood or marriage to any employee, currently working for the Department of Public Housing & Community Development and/or the Community Action and Human Services

am related by blood or marriage to an employee (please name)

\_\_\_\_\_ currently working for the Department of Public Housing & Community Development and/or the Community Action and Human Services

I attest also, that I have not made payment of any additional fees, inducements, or other transactions that are not (or will not be) disclosed in the USHUD Settlement Statement.

Willna Fenelon  
Signature of Applicant

\_\_\_\_\_  
Signature of Co-Applicant

Beautification Loan#