

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. Please contact the State of Florida Commission on Ethics if you have any questions regarding possible conflicts under state law.

If you have any questions regarding this opinion, please call Ardyth Walker, Staff General Counsel at (305) 579-2653 or the undersigned at (305) 579-2594.

Sincerely Yours,

A handwritten signature in cursive script, appearing to read "Robert Meyers", followed by a horizontal line extending to the right.

ROBERT MEYERS
Executive Director

directors or heads of departments to file financial disclosure. The Executive Directors of these boards are department heads because the directors have the responsibility of the day-to-day operation of the boards, manage personnel, execute contracts and handle all financial responsibilities for the trust. Further, the boards are fully funded by the city and all decisions are subject to approval by the City Commission. Therefore, these Executive Directors are required to file financial disclosure.

II. ADMINISTRATORS

- A. Fire Fighters' and Police Officers' Retirement Trust
- B. General Employees and Sanitation Employees' Retirement Trust

The Conflict of Interest and Code of Ethics ordinance does not require the administrators of the Retirement Trust funds to file financial disclosure because the retirement trust boards are fully autonomous agencies who do not report to the City Commission. Since the administrators do not fall under any category required to file financial disclosure, the administrators are not required to file disclosure.

III. STATE OF FLORIDA STATEMENT OF FINANCIAL INTEREST FORMS

- A. Health Facilities Authorities Board
- B. Off-Street Parking Board
- C. Budget and Finances Review
- D. Jobs and Education Partnership Regional Board

The Commission found that any questions regarding State financial disclosure requirements should be referred to the State of Florida Commission on Ethics.



ETHICS COMMISSIONERS

Kerry E. Rosenthal, Chairperson
Charles A. Hall, Vice Chairperson
Elizabeth M. Iglesias
Knovack G. Jones
Robert H. Newman

ROBERT A. MEYERS
EXECUTIVE DIRECTOR

MICHAEL P. MURAWSKI
ADVOCATE

ARDYTH WALKER
STAFF GENERAL COUNSEL

April 18, 2001

Walter Foeman
City Clerk
Office of the City Clerk
3500 Pan American Drive
P.O. Box 330708
Miami, FL 33233

RE: REQUEST FOR ADVISORY OPINION 01- 24

Dear Mr. Foeman:

The Commission on Ethics and Public Trust considered your request for an advisory opinion at its meeting on April 4, 2001 and rendered its opinion based on the facts stated in your letter.

You requested an opinion regarding the Financial Disclosure requirements for executive directors and administrators of some city boards and financial disclosure requirements for members of some other boards.

The Commission found the following:

- I. EXECUTIVE DIRECTORS
 - A. Bayfront Park Management Trust
 - B. International Trade Board
 - C. Community Redevelopment Board

The Conflict of Interest and Code of Ethics ordinance requires these Executive Directors to file financial disclosure forms. Section 2-11.1 (i) (2) requires all department