



**FILE COPY**

June 2, 2008

Julie Edwards  
Executive Director  
Community Action Agency  
701 N.W. First Court  
Miami, FL 33136

**ETHICS COMMISSIONERS**

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ROBERT A. MEYERS  
EXECUTIVE DIRECTOR

MICHAEL P. MURAWSKI  
ADVOCATE

ARDYTH WALKER  
STAFF GENERAL COUNSEL

**RE: REQUEST FOR ADVISORY OPINION RQO 08-25**

Dear Mrs. Edwards:

The Commission on Ethics and Public Trust considered your request for an advisory opinion at its meeting on May 29, 2008 and rendered its opinion based on the facts stated in your letter.

You requested an opinion regarding whether CAA employees may provide contributions to the state and national organizations that provide advocacy and technical support to community action agencies.

In your request, you advised the Commission that the Miami-Dade County Community Action Agency provides a wide range of social services including Head Start, Meals on Wheels and weatherization programs. The National Community Action Partnership provides advocacy services, technical support and resources to community action agencies across the country. The Miami-Dade Community Action Agency is a member of the national organization. The national organization solicits donations from employees of member organizations to support its programs. The state-wide agency, Florida Association for Community Action, also solicits donations from employees to support its programs. The statewide agency provides technical support, conferences and certification to employees and board members of local agencies.

The Florida Association for Community Action recently asked each agency to donate

additional funds to support its advocacy work on avoiding statewide budget cuts. The agencies were each asked to contribute one thousand dollars by soliciting funds from board members and staff. CAA is requesting an opinion regarding whether the agency may directly solicit funds from employees to support the state and national organizations.

The Ethics Commission found the Conflict of Interest and Code of Ethics ordinance permits CAA to solicit funds from employees to support the state and national organizations. Section 2-11.1(e)(2)(e) permits county employees to solicit donations on behalf of the County in furtherance of its official duties. The Ethics Commission has previously opined that this section permits employees to solicit donations on behalf of third parties (such as the United Way and hurricane relief) which benefit the community or the county. The Miami-Dade CAA benefits from the advocacy and technical assistance provided by the state and national organizations. Therefore, CAA may solicit voluntary contributions from employees for the state and national organizations.

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 the undersigned at (305) 579-2594 or Ardyth Walker, Staff General Counsel at (305) 350-0616.

Sincerely Yours,



ROBERT MEYERS  
Executive Director