

Sanchez, Rodzandra (COE)

From: Diaz-Greco, Gilma M. (COE)
Sent: Friday, June 08, 2018 3:33 PM
To: Sanchez, Rodzandra (COE)
Subject: FW: INQ 18-141, Carmen Bofill, Financial Disclosure and Outside Employment Coordinator, Miami-Dade Elections Department (Financial Disclosure)

INQ 18-141 Bofill

From: Diaz-Greco, Gilma M. (COE)
Sent: Friday, June 08, 2018 3:33 PM
To: Bofill, Carmen (Elections) <Carmen.Bofill@miamidade.gov>
Cc: Centorino, Joseph (COE) <Joseph.Centorino@miamidade.gov>; Murawski, Michael P. (COE) <Michael.Murawski@miamidade.gov>; Perez, Martha D. (COE) <Martha.Perez2@miamidade.gov>; Turay, Radia (COE) <Radia.Turay@miamidade.gov>; Castellanos, Ramon (Elections) <Ramon.Castellanos2@miamidade.gov>; Trutie, Suzy (Elections) <suzy.trutie@miamidade.gov>; Olmo, Nilda (COE) <Nilda.Olmo@miamidade.gov>
Subject: INQ 18-141, Carmen Bofill, Financial Disclosure and Outside Employment Coordinator, Miami-Dade Elections Department (Financial Disclosure)

Dear Carmen:

You inquired whether the Elections Department may accept County Source of Income (SOI Form) financial disclosure forms where Social Security payments have been listed as a source of the reporting party's income, but an address has not been provided.

The SOI form does not require that filers list the **amounts** of income they earn, only the **names and addresses** of those sources. The requirement that the address of a filer's source of income be listed is to promote transparency and provide sufficient information to verify filers financial interests relating to their income. County Ethics Code § 2-11.1(i).

The case of Social Security benefits presents a special circumstance. Social Security benefits and payments are administered by the Federal Government and by multiple Social Security offices at the local level. Furthermore, payments are deposited directly into the recipient's bank account and no paperwork is created which lists a specific social security office address. However, the Social Security website does provide a central address to which the public can make inquiries. This address is:

Social Security Administration
Office of Public Inquiries
1100 West High Rise
6401 Security Blvd.
Baltimore, MD 21235

The Commission has previously determined that where no specific address is available, providing a description that would serve to distinguish a particular source would meet the address requirement in the Source of Income Statement. See INQ 16-65 (Where no address is available, a description that would serve to distinguish a source of income from another would meet the address requirement in the Source of Income Statement). Therefore, in the case of Social Security payments, we find that listing the term "Social Security" is sufficient to meet the requirements of the County SOI form, even without a specific address, because the Social Security Administration provides a central address to which inquiries can be made, and that address can be automatically attributed to a filer who lists Social Security retirement payments as source of income on the County SOI Form.

Please contact me if you have any further questions.

Best regards,

Gilma (Mimi) Diaz-Greco
Staff Attorney



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From: Financial Disclosures (Elections)
Sent: Thursday, June 07, 2018 4:25 PM
To: Diaz-Greco, Gilma M. (COE) <Gilma.Diaz-Greco@miamidade.gov>
Cc: Financial Disclosures (Elections) <FINDISCELEC@miamidade.gov>
Subject: Source of Income Statement for Social Security

Good afternoon Mimi,

It was a pleasure speaking with you today. Per our conversation, I have several Board Members that receive Social Security and they are not entering the address on the Source of Income Statement. We try to get them to complete the form correctly, but most of time they refuse to get the address, or do not know where to obtain the address. As such, they become delinquent and the names are provided to your office in November. Can you please advise how you would like for us to proceed with these forms?

Thank you

Carmen Bofill

Financial Disclosure and Outside Employment Coordinator
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