

## Sanchez, Rodzandra (COE)

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**From:** Diaz-Greco, Gilma M. (COE)  
**Sent:** Friday, October 19, 2018 4:16 PM  
**To:** Sanchez, Rodzandra (COE)  
**Subject:** INQ 18-232, Martin Sonless, Commission Aide, Commissioner Xavier Suarez (Dist. 7)  
(Exploitation of official position, hosting fundraiser for political candidate)

INQ 18-232 Sonless

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**From:** Arrojo, Jose (COE)  
**Sent:** Friday, October 19, 2018 2:54 PM  
**To:** Martin, Sonless (DIST7) <Sonless.Martin@miamidade.gov>  
**Cc:** Perez, Martha D. (COE) <Martha.Perez2@miamidade.gov>; Turay, Radia (COE) <Radia.Turay@miamidade.gov>; Diaz-Greco, Gilma M. (COE) <Gilma.Diaz-Greco@miamidade.gov>; Murawski, Michael P. (COE) <Michael.Murawski@miamidade.gov>  
**Subject:** Request for Opinion, INQ 18-232, Martin Sonless (Dist. 7) (Exploitation of official position, hosting fundraiser for political candidate)

Dear Mr. Sonless:

Thank you for contacting the Miami-Dade Commission on Ethics and requesting our guidance regarding your plan to host or co-host a fundraising reception for a current elected official seeking higher political office. You additionally advise that the reception will be held after your normally scheduled work hours.

As a county employee you are of course free to exercise your right to engage in the political process, to endorse or support candidates, and to solicit donations on behalf of a candidate for public office. These activities would not violate the County Ethics Code, Section 2-11.1(g), *Exploitation of official position prohibited*. See INQs 16-178, 16-220, 14-205.

Of course, you may not use any county resources in support of the candidate, you may not participate in any activities in support of the candidate while you are otherwise engaged during your county work-day, and you may not directly or indirectly use your position as a staffer to a County Commissioner, to intimidate or coerce others into supporting your chosen candidate or to make political contributions. Any actions of this nature would constitute conduct proscribed by Section 2-11.1(g).

This opinion construes the Miami-Dade Conflict of Interest and Code of Ethics ordinance only and not applicable to any prohibited conduct under state law. Also, this opinion is based only on the facts provided by the party requesting the opinion. You may contact the State of Florida Commission on Ethics for questions regarding limitations under state law.

INQs of this type are informal ethics opinions provided by the legal staff after being reviewed and approved by the Executive Director. INQs deal with opinions previously addressed in public session by the Ethics Commission or within the plain meaning of the County Ethics Code. RQOs are opinions provided by the Miami-Dade Commission on Ethics and Public Trust when the subject matter is of great public importance or where there is insufficient precedent. While these are informal opinions, covered parties that act contrary to the opinion may be

referred to the Advocate for preliminary review or investigation and may be subject to a formal Complaint filed with the Commission on Ethics and Public Trust.

Thank you again for seeking guidance from the Commission on Ethics. Please do not hesitate to contact me should you require any additional assistance.

Best regards,

**Jose J. Arrojo**

Executive Director

Miami-Dade Commission on Ethics and Public Trust

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