

**Frigo, Victoria (COE)**

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**From:** Frigo, Victoria (COE)  
**Sent:** Tuesday, May 25, 2010 3:40 PM  
**To:** 'Joseph H. Serota'; 'pizzim@miamilakes-fl.gov'  
**Cc:** Meyers, Robert (COE); Murawski, Michael P. (COE)  
**Subject:** Municipal board and committee members cannot be exempt from financial disclosure requirements  
**Attachments:** Miami Lakes Res 05-320.pdf; Co. Ord. 08-53.pdf; Source\_of\_Income\_Statement.pdf

It has come to our attention that some board and committee members in Miami Lakes may be erroneously relying on Miami Lakes Resolution 05-320, passed in June 2005, which exempts board and committee members in that municipality from filing financial disclosure forms.

Please note that Miami Lakes Resolution 05-320 is no longer valid, based on County Ordinance 08-53, approved in 2008. This ordinance amended the County Code at Sec. 2-11.39.2 to **delete** a provision that had previously allowed County (and municipal) commissioners to exempt boards and committees from the County Ethics Code (including exempting members from filing financial disclosure forms).

Since municipalities cannot pass legislation that is less restrictive than the County's, the Town of Miami Lakes cannot exempt its board and committee members from financial disclosure requirements.

The County Ethics Code at Sec. 2-11.1 (i) requires municipal board and committee members to file any one of four financial disclosure statements annually with their respective city clerks. The simplest, least intrusive form is the County's "Source of Income Statement," which is attached.

Please feel free to contact me if you have any questions.

Sincerely,

Victoria Frigo, Staff Attorney

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