



Via First Class Mail
and
email at JBasulto@miami-airport.com

ETHICS COMMISSIONERS

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ARDYTH WALKER
STAFF GENERAL COUNSEL

February 24, 2011

Juan Basulto, President
Masters A/C Corp.
14811 Palmetto Palm Ave.
Miami Lakes, FL 33014

Re: Outside Employment (INQ 11-27)

Dear Mr. Basulto:

The Ethics Commission investigated your outside employment history because you neglected to submit appropriate disclosure forms.

Your disclosure statement for 2009 did not indicate an income amount. **Please resubmit the 2009 "Outside Employment Statement" form to the Elections Department with the specific amount of compensation received. Additionally, send a copy of the corrected form to my attention, at the address below, to verify that you have complied.**

THE COUNTY ETHICS CODE prohibits County employees from accepting outside employment that conflicts with their public duties. County employees who engage in outside employment must seek permission to do so from their supervisors *annually*, and they must disclosure outside employment *income* with the Elections Department by July 1 of each year. (See County Code at Secs. 2-11.1 (j) & (k).)

THE FACTS as we understand them are that you are employed by the Miami-Dade County Aviation Department as a refrigeration/air conditioning mechanic supervisor. You said in a telephone conversation on Feb. 22, 2011, that your normal work hours are from 7:00 AM to 3:00 PM.

Your outside employment is with Masters A/C Corp., a privately owned company in which you serve as President. According to reports filed with the Florida Department of State, the company has no other officers.

Masters A/C Corp. services and repairs air conditioners for residential and light commercial customers. You are the only licensed professional qualifier for the company. As such, you insure that the work performed by the company conforms to standards of the industry and local building codes.

You stated that you are rarely required to be on a job site as the qualifier during regular business hours. The County Code demands, and you readily acknowledged, you must request annual leave for engaging in outside employment if you conduct personal business on County time.

Furthermore, you are aware that you may not use County facilities, equipment, supplies, or any other County resources to benefit your private interests. In a case such as yours, where a person's outside employment is similar to his County job, an appearance of impropriety may be created even when nothing improper has occurred.

If you have further questions about complying with outside employment requirements, please feel free to contact me at 305 350-0601

Sincerely,


VICTORIA FRIGO
Staff Attorney

copies:

Michael Murawski, Esq, Advocate, Miami-Dade Commission on Ethics
Miriam Ramos, Esq., Deputy Advocate, Miami-Dade Commission on Ethics
Breno Penichet, Investigator, Miami-Dade Commission on Ethics