
From: Diaz-Greco, Gilma M. (COE)
Sent: Monday, October 26, 2015 10:04 AM
To: Sanchez, Rodzandra (COE)
Subject: Jessica Olmedillo, Sr. Professional Services Specialist, Small Business Development Division, MDC Internal Services Dept. (Sunshine Law) INQ 15-238

INQ 15-238 Olmedillo

From: Centorino, Joseph (COE)
Sent: Monday, October 26, 2015 9:54 AM
To: Olmedillo, Jessica (ISD)
Cc: Diaz-Greco, Gilma M. (COE); Perez, Martha D. (COE); Sibilia, Rhonda (COE)
Subject: INQ 15-238 Jessica Olmedillo, Sr. Professional Services Specialist, Small Business Development Division, MDC Internal Services Dept. (Sunshine Law)

Ms. Olmedillo,

You have inquired regarding whether, in accordance with the Florida Sunshine Law, staff may provide members of a County advisory board with informational materials for distribution to other board members.

In general, members of a public board may not communicate privately among themselves, either orally or in writing, on issues that may foreseeably come before the board. However, there is a permissible procedure under the Sunshine Law by which information may be distributed by board members to other members. A board member may circulate, through the clerk of the board, written reports or other information on a subject that will be discussed at a public meeting without violating the Sunshine Law, if prior to the meeting, there is no interaction related to the report among the board members, and the report or other information is maintained as a public record and not used as a substitute for action at a public meeting. AGO 89-23 I suggest that any such communication to other board members come from the clerk of the board and be distributed among all board members, and be made available as a public record to any interested parties. The communication should contain a caveat that members should not respond to the information

Joseph M. Centorino

Executive Director and General Counsel
Miami-Dade Commission on Ethics and Public Trust
19 W. Flagler Street, Suite 820
Miami, FL 33130
Tel: (305) 579-2594
Fax: (305) 579-0273
ethics.miamidade.gov



. Such response could be interpreted as interaction among board members in violation of the Sunshine Law. In addition, although this procedure is permissible under the Sunshine Law, it is generally discouraged and should not be engaged in routinely.

From: Sibia, Rhonda (COE)
Sent: Monday, October 26, 2015 7:23 AM
To: Centorino, Joseph (COE) <CENTORI@miamidade.gov>
Subject: FW: Ethics for Advisory Boards

Joe, Would you please respond and copy me on your answer?

Thanks, Rhonda

From: Olmedillo, Jessica (ISD)
Sent: Friday, October 23, 2015 3:31 PM
To: Sibia, Rhonda (COE)
Subject: Ethics for Advisory Boards

Rhonda,

I participated in one of your ethics training during the summer and I received a few items regarding the Sunshine Law. However, I could not determine if our members may provide staff (myself) with data to disseminate via email to other members prior to the next scheduled meeting. I am leaning toward collecting the information but only providing the data when I send them the next agenda. Can you provide me guidance or direct me to where I could find the answer?

Thank you!

Jessica Olmedillo

Sr. Professional Service Specialist
Internal Services Department
Small Business Development Division
111 N.W. 1ST Street, 19TH Floor
Miami, Florida, 33128
☎ (305) 375-3161 | 📠 (305) 375-3160
Email: jao@miamidade.gov
Website: <http://www.miamidade.gov/smallbusiness/>
Connect With Us on [Twitter](#) | [Facebook](#) | [Instagram](#)

"Delivering Excellence Every Day"