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INQ 16-79 Dormer

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**From:** Diaz-Greco, Gilma M. (COE)

**Sent:** Friday, March 11, 2016 3:26 PM

**To:** Dormer, Joan (ISD)

**Cc:** Centorino, Joseph (COE); Perez, Martha D. (COE); Turay, Radia (COE)

**Subject:** Joan Dormer, Personnel Specialist 2, Miami-Dade Internal Services Department (Financial Disclosures) INQ 16-79

Dear Ms. Dormer:

It was pleasure speaking with you over the phone. You have inquired whether a County department may create internal polices requiring personnel other than those enumerated in the County Ethics Code to file financial disclosures.

The County Ethics Code at Section 2-11.1(i)(2) requires, among others, that “Heads or Directors of County Departments and their Assistant or Deputy Department Heads” file financial disclosure forms. However, the Ethics Commission has previously provided guidance in both formal and informal opinions that County Departments may create internal policies requiring that additional personnel, such as Division Directors or other employees, file financial disclosure forms where such positions are comparable in authority and responsibility to that of a Department Director or Assistant Director; or where an employee has the authority to serve as the designee of a Department Director, or Assistant or Deputy Director. *See e.g.* INQ 03-56, INQ 05-23, INQ 15-58 (attached) and RQO 08-36 (attached).

Furthermore, regardless of title, any County employee who has been delegated the authority to approve a single expense over \$20,000.00 is required by Florida law to file State Form 1. *See Fla. Stat.112.3145 (1)(a)(3) (2015)*. I hope this provides clarification on this matter. Please contact us if you have any further questions.

Best regards,

Gilma (Mimi) Diaz-Greco

Staff Attorney

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

[gdiagr@miamidade.gov](mailto:gdiagr@miamidade.gov)

[www.facebook.com/MiamiDadeEthics](http://www.facebook.com/MiamiDadeEthics)