

## Sanchez, Rodzandra (COE)

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**From:** Diaz-Greco, Gilma M. (COE)  
**Sent:** Friday, December 22, 2017 12:18 PM  
**To:** Sanchez, Rodzandra (COE)  
**Subject:** FW: Traci Pollock, Special Projects Administrator II , MDEAT (Financial Disclosure) INQ 17-292

Please note INQ number which is:

INQ 17-292

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**From:** Diaz-Greco, Gilma M. (COE)  
**Sent:** Thursday, December 21, 2017 3:17 PM  
**To:** Pollock, Traci (MDEAT) <[Traci.Pollock@miamidade.gov](mailto:Traci.Pollock@miamidade.gov)>  
**Cc:** Centorino, Joseph (COE) <[Joseph.Centorino@miamidade.gov](mailto:Joseph.Centorino@miamidade.gov)>; Murawski, Michael P. (COE) <[Michael.Murawski@miamidade.gov](mailto:Michael.Murawski@miamidade.gov)>; Smith, Terrence (CAO) <[Terrence.Smith@miamidade.gov](mailto:Terrence.Smith@miamidade.gov)>; Smith, Loren (COC) <[Loren.Smith@miamidade.gov](mailto:Loren.Smith@miamidade.gov)>; Perez, Martha D. (COE) <[Martha.Perez2@miamidade.gov](mailto:Martha.Perez2@miamidade.gov)>; Turay, Radia (COE) <[Radia.Turay@miamidade.gov](mailto:Radia.Turay@miamidade.gov)>; Trutie, Suzy (Elections) <[suzy.trutie@miamidade.gov](mailto:suzy.trutie@miamidade.gov)>; Castellanos, Ramon (Elections) <[Ramon.Castellanos2@miamidade.gov](mailto:Ramon.Castellanos2@miamidade.gov)>; Bofill, Carmen (Elections) <[Carmen.Bofill@miamidade.gov](mailto:Carmen.Bofill@miamidade.gov)>; Olmo, Nilda (COE) <[Nilda.Olmo@miamidade.gov](mailto:Nilda.Olmo@miamidade.gov)>  
**Subject:** Traci Pollock, Special Projects Administrator II , MDEAT (Financial Disclosure)

Dear Ms. Pollock:

You have inquired about the financial disclosure requirements for MDEAT Board action committees.

The County Ethics Code requires that members of County boards file a financial disclosure statement no later than 12:00 noon of July 1st of each year including the July 1st following the last year that person served on the board. Miami-Dade Code 2-11.1(i). The definition of what constitutes a "board" is addressed in Miami-Dade Code Section 2-11.36.1(a) which states in relevant part that:

- (a) The term "board" is defined to include every agency, authority, advisory board, regulatory board, quasi-judicial board, semiautonomous instrumentality, **committee**, task force or any other citizens' group created and funded in whole or in part by the Board of County Commissioners. The foregoing notwithstanding, this article shall not apply to citizen groups created for specific advisory purposes where such group's existence is limited to a period of less than one (1) year. (Emphasis added).

Assuming that none of these advisory committees would have a State of Florida financial disclosure requirement, *Ad hoc* committees that serve for a period of **less than one year** are not included in the definition of "boards" under Section 2-11.36.1(a), and their members would therefore not be required to file a financial disclosure statement on a yearly basis. However, committees that operate **for a year or longer** are considered County boards, and their members would be required to file a financial disclosure statement.

Thus, each MDEAT committee should be reviewed to determine whether it fits the definition of a "board" either under the MDEAT ordinance or in practice, in other words, if the committee is in fact operating for a period of a year or more. The Board attorney would be able to review MDEAT committees with you and assist with that determination.

The COE provides information on financial disclosure on a yearly basis. The Financial Disclosure Chart can be found at: <http://www.miamidade.gov/elections/library/instructions/financial-disclosure-requirements.pdf>.

Please contact me if you have any further questions.

Cordially,

Gilma (Mimi) Diaz-Greco  
Staff Attorney



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**From:** Pollock, Traci (MDEAT)  
**Sent:** Tuesday, December 19, 2017 10:53 AM  
**To:** Diaz-Greco, Gilma M. (COE) <[Gilma.Diaz-Greco@miamidade.gov](mailto:Gilma.Diaz-Greco@miamidade.gov)>  
**Subject:** RE: TRAINING SESSION FOR ADVISORY BOARD LIAISONS -- Question about MDEAT Action Committees

See his response below.

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**From:** Diaz-Greco, Gilma M. (COE)  
**Sent:** Tuesday, December 19, 2017 10:37 AM  
**To:** Pollock, Traci (MDEAT) <[Traci.Pollock@miamidade.gov](mailto:Traci.Pollock@miamidade.gov)>  
**Subject:** RE: TRAINING SESSION FOR ADVISORY BOARD LIAISONS -- Question about MDEAT Action Committees

Hi Traci:

What did the board attorney indicate?

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**From:** Pollock, Traci (MDEAT)  
**Sent:** Tuesday, December 19, 2017 10:19 AM  
**To:** Diaz-Greco, Gilma M. (COE) <[Gilma.Diaz-Greco@miamidade.gov](mailto:Gilma.Diaz-Greco@miamidade.gov)>  
**Subject:** FW: TRAINING SESSION FOR ADVISORY BOARD LIAISONS -- Question about MDEAT Action Committees

Hi Gilma,

Hope all is well.

I am wondering if you are able to provide me with confirmation regarding the financial disclosure requirement for the MDEAT Board action committees. I did reach out to the agency's attorney as you suggested yesterday after the presentation; however, I am wondering if I can get definitive confirmation; I do not want to establish a new stipulation for committee membership (non-board members) regarding financial disclosure forms when they do not have to do so. It is tough enough to get 100% compliance from the actual board members.

Please know that these committee members do not complete the same process for membership as actual board members. So there is no oath of office, no clerk's contact sheet, no names submitted to the clerk for record-keeping purposes. However, they are required to complete the ethics training with the commission on ethics within 90 days of their appointment by the MDEAT board.

I've attached a copy of the MDEAT Bylaws as updated in 2017. See Section 5 regarding committees (page 6).

Thanks in advance.

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**From:** Smith, Terrence (CAO)  
**Sent:** Monday, December 18, 2017 2:13 PM  
**To:** Pollock, Traci (MDEAT) <[Traci.Pollock@miamidade.gov](mailto:Traci.Pollock@miamidade.gov)>  
**Subject:** RE: TRAINING SESSION FOR ADVISORY BOARD LIAISONS -- Question about MDEAT Action Committees

I think they do.

Terrence A. Smith  
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**From:** Pollock, Traci (MDEAT)  
**Sent:** Monday, December 18, 2017 12:57 PM  
**To:** Smith, Terrence (CAO) <[Terrence.Smith@miamidade.gov](mailto:Terrence.Smith@miamidade.gov)>  
**Subject:** TRAINING SESSION FOR ADVISORY BOARD LIAISONS -- Question about MDEAT Action Committees

Hi Terrence,

I just left an advisory board liaison training held in the commission chambers. In one of the slides, it was noted that ad-hoc members of less than a year do not have to file a financial disclosure form. However, when I sought clarification regarding MDEAT standing committees as noted in the bylaws, I was directed to you.

Can you please advise if the non-board members of the action committee (YAC, EDAC, HAC) must also submit financial disclosure forms even though they are not reported to the clerk of courts? As you may recall these members serve 2-year terms up to three times. Since I returned in 2012, I do not recall any of these non-board members submitting a financial disclosure form to Elections. They are mandated to take the ethics course within the first 90 days of appointment but nothing else has been required.

Thanks in advance.

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**Traci Pollock, MBA, MPA**  
**Special Projects Administrator II (Operations)**  
**Miami-Dade Economic Advocacy Trust**  
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