


**COMMISSION ON
ETHICS AND PUBLIC
TRUST**

Inq 04-116

Memo

To: Honorable Rebeca Sosa, Commissioner, District 6
Board of County Commissioners

From: Robert Meyers, Executive Director 
Commission on Ethics and Public Trust

Date: 9/28/04

Re: Request for Opinion

I am in receipt of your memorandum dated September 20, 2004 and I have had the opportunity to discuss this matter with the County Attorney's Office. Before giving you an opinion, I will summarize the relevant facts. You are employed by the Miami-Dade Public Schools and work in the Workforce Development Division. As a County Commissioner, you wish to donate a portion of your district funds to the Parent Teacher Student Association (PTSA), an organization that is independent from the Miami-Dade County Public Schools.

Based upon the fact that the PTSA is not regulated or controlled by the School District, then there is no conflict of interest under the County's Conflict of Interest and Code of Ethics Ordinance if you donate some of your district funds to this organization.

If you have any questions or wish to discuss the above in greater detail, please do not hesitate to contact me at your convenience.



**MEMORANDUM
BOARD OF COUNTY COMMISSIONERS**

TO: Robert Meyers, Executive
Director
Commission on Ethics and
Public Trust

DATE: September 20, 2004

FROM: Commissioner Rebeca Sosa
District 6

SUBJECT: PTA Donations

Since I was elected, I have been very proactive in assisting needy organizations with-in District 6. I have always been a careful steward with the donation of county funds to any organization. However, it has been brought to my attention, that there might be a potential conflict of interest with the donation of Commissioner District Funds donated to Parent Teacher Student Associations (PTSA), as I'm employed within the Workforce Development Division of the Miami-Dade County School District.

In the past, our office asked for a legal opinion regarding donations to children programs for school's whose school boundaries are within the jurisdiction of District 6. We were told by the County Attorneys office not to donate directly to the school district, instead to donate via the schools Parent Teacher Association (PTA) programs, as these programs are administered by volunteer parents and teachers and not subject to school district governance.

In order to clarify any misconception with a potential conflict of interest on this matter, I would like a written legal opinion clarifying if I'm allowed to donate District Funds to PTA's while being employed by the Miami-Dade County School District Workforce Development Division.

Cc: Robert Ginsburg, County Attorney