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STAFF GENERAL COUNSEL

January 3, 2007

Dario Desrouleaux  
2101 Brickell Avenue #2511  
Miami, FL 33129

**RE: REQUEST FOR ADVISORY OPINION 06-61  
(Amended)**

Dear Mr. Desrouleaux:

The Commission on Ethics and Public Trust considered your request for an advisory opinion at its meeting on December 21, 2006 and rendered its opinion based on the facts stated in your letter.

You requested an opinion regarding whether you are required to file an outside employment disclosure form for companies in which you own stock. Further, you requested an opinion regarding whether you may own a business with an employee for a county contractor.

In your letter, you advised the Commission that you are the Causeway Manager for TSI. TSI is a company whose sole purpose is to manage the Rickenbacker and Venetian Causeways for Miami-Dade County. As Causeway Manager, you are responsible for daily operations of the toll plazas, managing the toll collectors, scheduling and preparing the payroll.

~~You have a partial interest in four~~  
companies: Madaer Consulting, L.L.C.; D.E.M. Consulting, Pria, L.L.C. and Derulo Enterprises, L.L.C. The co-owner of Madaer is

Mauricio Caro, a Toll Systems Inc. employee. Caro is responsible for the maintenance of the toll equipment.

You previously filed an outside employment form for Tropicraft, Inc but did not file an outside employment form for your work as a realtor for First Home Realty.

In the first instance, you must obtain permission from your department director for any outside employment to ensure that it does not conflict with your employment and that it does not impair your judgment in fulfilling the requirements of your position.

Further, you are required to file an outside employment form for the four companies in which you have an ownership interest and your job as a realtor for First Home Realty. Section 2-11.1(k) requires "all full-time County and municipal employees engaged in any outside employment for any person, firm, corporation or entity other than Miami-Dade County or the respective municipality or any of their agencies or instrumentalities shall file, under oath, an annual report indicating the source of the outside employment, the nature of the work being done pursuant to same and any amount or types of money or other consideration received by the employee from said outside employment". You are required to file the form, whether or not the outside ventures made money, so that the public is informed of an employee's outside business ventures and any potential conflicts.

This opinion construes the Miami-Dade Conflict of Interest and Code of Ethics ordinance only and is not applicable to any ~~conflict under state law~~. Please contact the State of Florida Commission on Ethics if you have any questions regarding possible conflicts under state law.

If you have any questions regarding this opinion, please call the undersigned at (305) 579-2594 or Ardyth Walker, Staff General Counsel at (305) 350-0616.

Sincerely Yours,

A handwritten signature in cursive script, appearing to read "Robert Meyers", followed by a long horizontal line extending to the right.

ROBERT MEYERS  
Executive Director