

Sanchez, Rodzandra (COE)

From: Diaz-Greco, Gilma M. (COE)
Sent: Wednesday, June 20, 2018 3:30 PM
To: Sanchez, Rodzandra (COE)
Subject: INQ 18-152 Betty Aguirre, Chief of Staff, Miami-Dade County Commissioner Rebeca Sosa (Exploitation re: Campaign activity)
Attachments: INQ 15-270 Tourgeman.pdf; publicemployeepoliticalactivitymemo2016.docx

INQ 18-152 Aguirre and Sosa

From: Centorino, Joseph (COE)
Sent: Wednesday, June 20, 2018 9:34 AM
To: Aguirre, Betty (DIST6) <Betty.Aguirre@miamidade.gov>
Cc: Turay, Radia (COE) <Radia.Turay@miamidade.gov>; Perez, Martha D. (COE) <Martha.Perez2@miamidade.gov>; Diaz-Greco, Gilma M. (COE) <Gilma.Diaz-Greco@miamidade.gov>; Sanchez, Gerald (CAO) <Gerald.Sanchez@miamidade.gov>; Kirtley, Eddie (CAO) <Eddie.Kirtley@miamidade.gov>
Subject: Betty Aguirre, Chief of Staff, Miami-Dade County Commissioner Rebeca Sosa (Exploitation re: Campaign activity)

Betty,

You have asked whether it would be permissible during the upcoming re-election campaign of Miami-Dade Commissioner Rebeca Sosa (DIST6), for the campaign to utilize photographs that may have been taken in connection with Commissioner Sosa's official public duties. I informed you that insofar as such photographs are considered to be public records of the County, they may be accessed and used by anyone for any lawful purpose, including political campaign usage. The only question you need to address is whether there is any cost associated with the production and conveyance of the photograph that would, in the usual course of business, be charged to the general public for the provision of the photograph or other public record, then that same fee should be paid by the campaign to the County. Any special access to such material without paying the same fee that would be charged to the public could constitute an Exploitation of Official position in violation of Section 2-11.1(g) of the County Ethics Code. I have attached INQ 15-270, which deals with a similar situation.

Additionally, it is my understanding that you will be taking a leave of absence from your position on Commissioner Sosa's staff in order to work on the campaign. That is completely lawful and not in violation of Section 2-11.1(g), provided that no resources of Commissioner Sosa's public office are utilized for political campaign purposes, including the use of office staff on County time or County equipment or facilities. I have attached a memo that we have provided in the past that includes guidelines for public employees involved in political campaign activities.

If you should have any further questions, please call me.

Sincerely,

Joe Centorino

Joseph M. Centorino
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