

## Sanchez, Rodzandra (COE)

---

**From:** Diaz-Greco, Gilma M. (COE)  
**Sent:** Friday, November 02, 2018 1:44 PM  
**To:** Sanchez, Rodzandra (COE)  
**Subject:** FW: INQ 18-238, Eddie Arroyo, Public Records Specialist 1, Miami-Dade police Department (Outside Employment and limitations on Transacting business with the County)  
**Attachments:** INQ 18-238 Arroyo.pdf; Outside employment Guidelines Nov. 2017.pdf

INQ 18-238 Arroyo

---

**From:** Diaz-Greco, Gilma M. (COE)  
**Sent:** Friday, November 02, 2018 1:39 PM  
**To:** Arroyo, Eddie A. <eaarroyo@mdpd.com>  
**Cc:** Arroyo, Jose (COE) <Jose.Arroyo@miamidade.gov>; Murawski, Michael P. (COE) <Michael.Murawski@miamidade.gov>; Perez, Martha D. (COE) <Martha.Perez2@miamidade.gov>; Turay, Radia (COE) <Radia.Turay@miamidade.gov>  
**Subject:** FW: INQ 18-238, Eddie Arroyo, Public Records Specialist 1, Miami-Dade police Department (Outside Employment and limitations on Transacting business with the County)

Mr. Arroyo:

Attached please find your ethics opinion. Please contact me if you have any questions.

Cordially,

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  
[gdiazgr@miamidade.gov](mailto:gdiazgr@miamidade.gov)  
[www.facebook.com/MiamiDadeEthics](http://www.facebook.com/MiamiDadeEthics)

This email and any attachments are for the exclusive and confidential use of the intended recipient(s). If you are not an intended recipient, please do not read, distribute or take action in reliance upon this message. If you have received this in error, please notify me immediately by return email and promptly delete this message and its attachments from your computer. Miami-Dade County is a public entity subject to Florida's public record laws. Any communication with this office, including e-mail messages, could be considered a public record subject to disclosure.

---

**From:** Diaz-Greco, Gilma M. (COE)  
**Sent:** Friday, October 26, 2018 3:16 PM

**To:** 'Arroyo, Eddie A.' <[earroyo@mdpd.com](mailto:earroyo@mdpd.com)>

**Subject:** RE: Financial Disclosures

Mr. Arroyo:

Apologies for the delay in responding to this matter. I would like to speak with you to obtain additional details. I called the phone number listed for you on outlook but was unable to reach you. Would you please call me next Monday morning to discuss?

Thank you,

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

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

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

---

**From:** Arroyo, Eddie A. <[earroyo@mdpd.com](mailto:earroyo@mdpd.com)>

**Sent:** Thursday, September 27, 2018 9:59 AM

**To:** Diaz-Greco, Gilma M. (COE) <[Gilma.Diaz-Greco@miamidade.gov](mailto:Gilma.Diaz-Greco@miamidade.gov)>

**Subject:** RE: Financial Disclosures

Good Morning Diaz-Greco,

My have a home studio and have been painting since graduating F.I.U., the series if mostly landscape paintings. The work gained attention and within the art community and was encouraged to apply for the grant. I get invited by gallery and project spaces to exhibit my paintings and have sold some work. The paintings are leisurely in purpose but I am open to speak to people who are interested in my practice. I'm not registered as an Limited Liability Company (LLC) so there is no business established.

Eddie

---

**From:** Diaz-Greco, Gilma M. (COE) [<mailto:Gilma.Diaz-Greco@miamidade.gov>]

**Sent:** Thursday, September 27, 2018 9:29 AM

**To:** Arroyo, Eddie A. <[earroyo@mdpd.com](mailto:earroyo@mdpd.com)>

**Subject:** RE: Financial Disclosures

Good morning Mr. Arroyo:

We would need additional details before answering.

Please describe your hobby as well as the terms of the grant. With respect to your work as an artist- do you have a studio; do you sell your work? Have you established a business for that purpose?

Please advise and thank you.

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  
[gdiazgr@miamidade.gov](mailto:gdiazgr@miamidade.gov)  
[www.facebook.com/MiamiDadeEthics](http://www.facebook.com/MiamiDadeEthics)

---

**From:** Financial Disclosures (Elections)  
**Sent:** Monday, September 24, 2018 2:23 PM  
**To:** Arroyo, Eddie A. <[earroyo@mdpd.com](mailto:earroyo@mdpd.com)>  
**Cc:** Financial Disclosures (Elections) <[FINDISCELEC@miamidade.gov](mailto:FINDISCELEC@miamidade.gov)>; Diaz-Greco, Gilma M. (COE) <[Gilma.Diaz-Greco@miamidade.gov](mailto:Gilma.Diaz-Greco@miamidade.gov)>  
**Subject:** RE: Financial Disclosures

Good afternoon,

Since we are only the records custodians for the outside employment statement. I recommend you contact the Miami-Dade Commission on Ethics and Public Health Trust, copied above, for guidance.

Hope this helps, but if we may be of additional assistance do not hesitate to contact our office.

Thank you,

Ramon Castellanos Jr, Records Custodian  
Government Affairs and Media Relations Division  
Miami-Dade County Elections Department

2700 NW 87<sup>th</sup> Avenue  
Miami, Florida 33172  
Office 305-499-8541

<http://www.miamidade.gov/elections>

"Delivering Excellence Every Day"



---

**From:** Arroyo, Eddie A. [<mailto:earroyo@mdpd.com>]  
**Sent:** Monday, September 24, 2018 2:12 PM

**To:** Financial Disclosures (Elections) <[FINDISCELEC@miamidade.gov](mailto:FINDISCELEC@miamidade.gov)>

**Subject:** Financial Disclosures

Hello,

Recently, I was awarded The South Florida Cultural Consortium Grant as an artist, a hobby I foster outside of MDPD. I'm uncertain if this is considered outside employment due to the monetary gain from the recognition and request your review.

Here is a link to the awarded:

[https://miamidadepublicart.org/app2/sites/default/files/files/17-18\\_%20SFCC%20PR\\_MS.pdf#overlay-context=node/43](https://miamidadepublicart.org/app2/sites/default/files/files/17-18_%20SFCC%20PR_MS.pdf#overlay-context=node/43)

Thanks for any assistance,

Eddie Arroyo  
Police Records Specialist 1 / FSB Safety Officer  
Fingerprint Identification Section  
Forensic Services Bureau  
(305) 471-2970

"Delivering Excellence Every Day"

Confidentiality Notice: This e-mail and any files transmitted with it are private and confidential and are solely for the use of the addressee. Although this agency is subject to Florida State Statute Section 119, some of this material may be confidential and/or exempt from public records law. If you are not the addressee or the person responsible for delivering to the addressee, please immediately reply to the sender, delete this transmission, and destroy any printed items. Thank you for your compliance.



## MIAMI-DADE COMMISSION ON ETHICS AND PUBLIC TRUST

19 West Flagler Street, Suite 820 □ Miami, Florida 33130

Phone: (305) 579-2594 □ Facsimile: (305) 579-0273

Website: [ethics.miamidade.gov](http://ethics.miamidade.gov)

---

---

### MEMORANDUM

---

---

**TO:** Eddie Arroyo  
Public Records Specialist 1  
Miami-Dade Police Department (MDPD)

**FROM:** Gilma Diaz-Greco, Staff Attorney  
Commission on Ethics

**SUBJECT:** INQ 18-238

**DATE:** November 1, 2018

**CC:** All COE Legal Staff; Nectar Ortiz, MDPD; Personnel Specialist 2; Heather Kendall, MDPD Fingerprint Supervisor

---

Thank you for contacting the Miami-Dade Commission on Ethics and Public Trust and requesting our guidance. It was a pleasure to speak with you over the phone and discuss the applicability of the County Ethics Code to your outside employment and to your receipt of a County funded grant.

Facts:

You are a full-time County employee working at the Miami-Dade County Police Department (MDPD) as a Public Records Specialist 1. You also produce, market and sell artwork and have also applied for the South Florida Cultural Consortium Grant. This grant is administered by the Miami-Dade Art in Public Spaces division of the County's Department of Cultural Affairs and is funded in part by Miami-Dade County as well as national and state cultural entities

Legal Analysis and Opinion

As we discussed, running an art business such as yours, where you produce art, advertise, and sell the artwork, is considered compensated work and therefore is outside employment. COE Outside Employment Guidelines Amended 2017 (running any consulting firm or business owned by the employee regardless of whether the firm/business is officially incorporated or whether the firm/business is generating income for the employee is considered outside employment). As a full-time County employee you will be required to complete a [Request for Outside Employment](#) and an

Outside Employment Statement every year while you are engaged in outside employment. Attached please find the COE Outside Employment Guidelines for informational purposes.

With respect to the South Florida Cultural Consortium Grant, it is administered by the Miami-Dade Art in Public Spaces division of the County's Department of Cultural Affairs and is funded in part by Miami-Dade County as well as national and state cultural entities. In this instance, the County Ethics code permits you to apply to, and accept a County grant because MDPD does not administer the grant; but you may not lobby for the grant. Miami-Dade Code 2-11.1(c) and (m)(1) and INQ 16-33. Please note that the COE has determined that engaging in outside activities that are compensated through a grant constitute outside employment. Such activity would therefore also be included in the outside employment paperwork described above which must be filed on a yearly basis. See RQO 17-01

This opinion is limited to the facts as you presented them to the Commission on Ethics and is limited to an interpretation of the County Ethics Code only and is not intended to interpret state laws. Questions regarding state ethics laws should be addressed to the Florida Commission on Ethics.

Cordially,



INQs are informal ethics opinions provided by the legal staff after being reviewed and approved by the Executive Director. INQs deal with opinions previously addressed in public session by the Ethics Commission or within the plain meaning of the County Ethics Code. RQOs are opinions provided by the Miami-Dade Commission on Ethics and Public Trust when the subject matter is of great public importance or where there is insufficient precedent. While these are informal opinions, covered parties that act contrary to the opinion may be referred to the Advocate for preliminary review or investigation and may be subject to a formal Complaint filed with the Commission on Ethics and Public Trust.