

June 18, 2008

Walter J. Foeman, City Clerk
City of Coral Gables
405 Biltmore Way
Coral Gables, FL 33134

Via First Class Mail and Fax at 305.460.5309

Re: INQ 08-111, Outside Employment Statement
County Ethics Code 2-11.1 (k)

Dear Mr. Foeman:

This is in response to your letter of June 13, 2008, in which you asked if police officers in the City of Coral Gables could summarize their off-duty employment details on the Miami-Dade County "Outside Employment Statement."

I have conferred with Ardyth Walker on this matter, and we are of the opinion that summarizing income from the same source is acceptable, but the name and address of *each* source of outside employment income must be disclosed. For example, a police officer who obtains several payments from the same source throughout a reporting year may total his or her income from that single source and provide the aggregate amount from the same source in the appropriate place on the form. The officer may not combine income totals from different sources.

I hope this clarifies the matter for you. If you have further questions, do not hesitate to contact our office.

Sincerely,

VICTORIA FRIGO
Staff Attorney

copy: Elizabeth Hernandez, City Attorney