

# Memorandum



**Date:** June 25, 2008  
**To:** Carl Cummings, Firefighter, Fire Rescue Dept.  
**From:** Victoria Frigo, Staff Attorney, Commission on Ethics  
**Subject:** INQ 08-114, Outside Employment, § 2-11.1 (k)

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Mr. Cummings,

You advised me on the phone today that you are a full-time Miami-Dade County Firefighter and you work part-time for Miami-Dade County as a reserve police officer. You asked if your part-time work for the County was considered “outside employment.”

I discussed your question with the Ethics Commission Staff General Counsel and we agree that your part-time work with the County is not “outside employment.” As defined in the County Code at § 2-11.1 (k), outside employment is work you do for any person, firm, corporation, or entity “other than Miami-Dade County.”

If you have further questions, please feel free to contact me.