

Frigo, Victoria (COE)

From: Frigo, Victoria (COE)
Sent: Thursday, June 16, 2011 2:07 PM
To: Abrahante, Roberto (DERM)
Subject: Outside Employment and Financial Disclosure Requirements

TO: ROBERTO ABRAHANTE, INQ 11-98

Hello Roberto,

This is in response to your questions about the requirements for filing outside employment forms and financial disclosure forms. From the facts you presented, it does not appear that you are required to file any of these forms.

Outside employment: You stated that you rent one residence and live in another residence. *Only employees who rent 3 or more properties are required to seek permission annually to engage in outside employment and thereafter submit annual "Outside Employment Statements." See Miami-Dade County Code at Secs. 2-11.1 (j) & (k).*

Financial disclosure: You stated that you are an Engineer 3 and have no purchasing authority. You further stated that you do not serve on any local government advisory boards. *Advisory board members are required to file one of four financial disclosure statements annually. The same is required of County employees, regardless of title, who are authorized to approve expenditures exceeding \$20,000. See Miami-Dade County Code at Sec. 2-11.1 (i).*

As we discussed, you may wish to clarify with your Department why you have been identified as an individual required to file financial disclosure forms. If a mistake has been made, please correct the error with the Elections Department to avoid possible proceedings before the Ethics Commission.

Please feel free to contact me if I can be of further assistance.

Sincerely,

VICTORIA FRIGO, STAFF ATTORNEY
MIAMI-DADE COUNTY COMMISSION ON ETHICS
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