

## **Frigo, Victoria (COE)**

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**From:** Cedeno, Rachelle (COE)  
**Sent:** Wednesday, April 25, 2012 10:19 AM  
**To:** Frigo, Victoria (COE)  
**Subject:** FW: Payment of Campaign workers

Rachelle Cedeno-Ross  
Administrative Legal Clerk  
Miami-Dade County Commission on Ethics and Public Trust  
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-----Original Message-----

**From:** Centorino, Joseph (COE)  
**Sent:** Wednesday, April 25, 2012 8:55 AM  
**To:** Cedeno, Rachelle (COE)  
**Subject:** FW: Payment of Campaign workers

Please file as an INQ

-----Original Message-----

**From:** Ethics (COE)  
**Sent:** Wednesday, April 25, 2012 8:53 AM  
**To:** 'Katrina Wilson'  
**Subject:** RE: Payment of Campaign workers

Ms. Wilson,

Inasmuch as it is state law, rather than county ordinance that would apply to the issue in question, any definitive opinion would have to come from either the Florida Attorney General or the Florida Secretary of State's Division of Elections.

My own opinion would be that, as long as it is the campaign that is paying the fair market value of the full wages earned by the employee, i.e., there is no unreported contribution and no contribution of services valued at more than the \$500 limit by either the company or the employee and both of them have been fully compensated for the loss of the employee's time to the business, then the campaign may expend its funds to pay for the employee's time in spent on the campaign in the manner suggested. This, of course, assumes that the campaign is paying only for services rendered to the campaign and not for services rendered to the company or for any non-campaign purpose.

Joe Centorino  
Executive Director, Miami-Dade Commission on Ethics and Public Trust

-----Original Message-----

From: Katrina Wilson [<mailto:k.wilson0313@gmail.com>]

Sent: Tuesday, April 24, 2012 4:02 PM

To: Ethics (COE)

Cc: Charles Maree

Subject: Payment of Campaign workers

Is it acceptable for a campaign worker to work out of an existing business and for the campaign to reimburse the business for the campaign workers' wages?

Thank You...