

---

**From:** Diaz-Greco, Gilma M. (COE)  
**Sent:** Wednesday, June 18, 2014 8:33 AM  
**To:** Sanchez, Rodzandra (COE)  
**Subject:** Ethics Opinion- Juliette Antoine, Assistant County Attorney (Outside Employment) INQ 14-146

INQ 14-146

---

**From:** Centorino, Joseph (COE)  
**Sent:** Tuesday, June 17, 2014 1:32 PM  
**To:** Antoine, Juliette (CAO)  
**Cc:** Diaz-Greco, Gilma M. (COE)  
**Subject:** INQ - Juliette Antoine, Assistant County Attorney (Outside Employment)

Ms. Antoine:

Most of the provisions of the Conflict of Interest Ordinance, section 2-11.1, particularly Section 2-11.1(j) concerning conflicting outside employment, would apply to all employees, fulltime or parttime. However, the disclosure form requirement in Section 2-11.1(k)(2), as well as the requirement of approval by the department head in Section 2-11, are specifically limited to fulltime employees. None of these requirements would apply to a contract employee unless that employee is employed under a contract that has been designated to comply with specified provisions of the Ethics Code pursuant to Section 2-11.1 (b)(13).

Joe Centorino

---

**From:** Antoine, Juliette (CAO)  
**Sent:** Tuesday, June 17, 2014 12:14 PM  
**To:** Centorino, Joseph (COE)  
**Subject:** RE: Outside Employment Guidelines for County Employees

Dear Mr. Centorino:

Does the outside employment guidelines apply to retired employees who have returned to serve the County on a part-time basis? What if they have returned as independent contractors. Thank you.

Sincerely yours,  
Juliette R. Antoine, Esq.  
Assistant County Attorney  
Miami-Dade County Attorney's Office  
111 NW First Street, Suite 2810  
Miami, Florida 33128  
t: (305) 375-1339 | f: (305) 375-5634  
e: jra1@miamidade.gov

---

**From:** Centorino, Joseph (COE)  
**Sent:** Wednesday, June 11, 2014 5:59 PM  
**To:** (MetroNet) All Users  
**Subject:** Outside Employment Guidelines for County Employees

The issue of what is permissible outside employment for county employees under the County Ethics Code has been the subject of numerous requests for opinions and guidance received by the staff at the Commission on Ethics. There are a number of different rules and policies involved that can easily lead to confusion. In general, it is best to seek guidance from a supervisor or from the Commission on Ethics when contemplating any type of employment outside the county government. The attached memorandum, prepared by our Deputy General Counsel, is a good summary of the general guidelines and many of the past opinions we have provided. It should be kept and reviewed by any county employee who is contemplating outside employment. Our staff is always ready to answer any specific question that any employee may have on this subject.

*Joseph M. Centorino*

Executive Director and General Counsel  
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  
[ethics.miamidade.gov](http://ethics.miamidade.gov)

