MIAMI-DADE COUNTY

Digital Integrity & Technology Compliance Office

OPERATIONAL BLUEPRINT & IMPLEMENTATION PLAN

Companion to the Neural Data Sovereignty & AI Governance Framework

Proposed By: Victor J. Rosario
Candidate for Mayor of Miami-Dade County
Election Day: November 7, 2028 | Residents-First Administration
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Executive Summary

Policy without infrastructure is theater. The Miami-Dade Neural Data Sovereignty and AI Governance Framework is only as strong as the office charged with enforcing it. This document provides the complete operational blueprint for the Digital Integrity and Technology Compliance Office (DITCO) — its structure, staffing, budget, authority, enforcement procedures, and first-year implementation roadmap.

DITCO is not an advisory panel. It is an enforcement engine with teeth: audit authority, contract suspension power, a resident complaint system, and an annual public transparency report. It is designed to outlast any single administration by being codified into county law.

1. Mission Statement & Legal Mandate

DITCO's mission is to protect Miami-Dade residents from unauthorized neural data collection, covert cognitive inference modeling, and non-compliant AI systems operating within county jurisdiction — through registration, disclosure review, auditing, enforcement, and public transparency.

Legal Authority

DITCO derives its authority from three sources:

- The Neural Data Sovereignty and AI Governance Ordinance (as proposed)
- Miami-Dade Home Rule Charter — procurement conditions, infrastructure access, licensing
- Florida Consumer Protection Law — Chapter 501, Part II, Florida Statutes

DITCO's enforcement is civil and contractual — not criminal. This is the framework's constitutional strength.

Criminal referrals go to the State Attorney or U.S. Attorney. DITCO keeps its lane and stays legally durable.

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2. Organizational Structure

DITCO operates as a standalone compliance office within the Mayor's Office, with budgetary independence to prevent political interference. It reports directly to the Mayor and publishes annual reports to the Board of County Commissioners.

Staffing Model — Year One (Lean Startup Phase)

Position	Responsibilities	Salary Range (Est.)
Executive Director	Office leadership, policy, public reporting, BCC liaison	$120,000 – $145,000
Senior Compliance Attorney	Legal review, enforcement actions, injunctive filings, referrals	$110,000 – $130,000
Technology Auditor (x2)	System audits, disclosure review, technical analysis of AI systems	$85,000 – $100,000 ea.
Resident Complaint Coordinator	Intake, triage, case tracking, resident communication	$60,000 – $75,000
Data & Transparency Analyst	Registry maintenance, annual report production, metrics	$70,000 – $85,000
Administrative Support	Operations, scheduling, records management	$45,000 – $55,000

Year One Budget Estimate

Category	Estimated Annual Cost
Personnel (6 FTEs)	$590,000 – $690,000
Technology & Audit Tools	$80,000 – $120,000
Legal & Expert Consultants	$75,000 – $100,000
Public Portal & Registry Infrastructure	$60,000 – $90,000
Training & Certifications	$20,000 – $30,000
Operations & Office	$30,000 – $45,000
TOTAL YEAR ONE	$855,000 – $1,075,000

Fiscal note: This budget is recoverable through civil penalty revenue and vendor compliance fees once the framework is operational. Comparable county compliance offices (e.g., Miami-Dade Inspector General) operate at $3M–$8M annually at full scale. DITCO launches lean and scales as caseload grows.

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3. Core Functions & Operating Procedures

3.1 Entity Registration & Disclosure Review

All covered entities must register with DITCO within 90 days of ordinance enactment. Registration requires submission of a Technology Disclosure Statement (TDS) describing every AI system that touches biometric, behavioral, or neural-adjacent data within county scope.

TDS Required Element	Standard
Data categories collected	Enumerated list, plain language
Purpose of collection	Specific, not generic
Cognitive inference present?	Yes/No + description
Retention period	Exact timeframe per data type
Storage location & jurisdiction	Country, state, cloud provider
Third-party access	Named subcontractors and purpose
Dynamic model updates	Disclosure of self-updating AI scope
Human oversight mechanism	Description of review pathway
Material change notification	30-day update obligation

3.2 Audit Protocol

DITCO conducts three types of audits:

Audit Type	Trigger	Scope
Routine Compliance Audit	Annual cycle, highest-risk entities first	Document review, TDS verification, retention policy check
Complaint-Driven Audit	Resident complaint filed	Targeted investigation of alleged violation
Reactive Breach Audit	Breach notification received	Scope assessment, containment review, negligence determination

Audit findings are documented formally. Entities receive written compliance notices with deadlines. Appeals go through administrative review with judicial access available. No arbitrary enforcement — every action is documented and reviewable.

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3.3 Resident Complaint System

Any Miami-Dade resident or visitor may file a complaint with DITCO through the public portal. Complaints must be acknowledged within 5 business days. Initial triage determines whether the complaint involves a covered entity and a cognizable violation.

- Complaints are logged in the public registry (anonymized)
- Complainants receive case status updates at 30, 60, and 90 days
- Resolution outcomes are published in the Annual Transparency Report
- Whistleblower protections apply for employees reporting on employer violations

3.4 Breach Response Protocol

Upon receiving a breach notification (required within 24 hours of discovery):

- DITCO acknowledges receipt and opens a breach file within 4 hours
- Technical staff assess scope and risk severity within 48 hours
- Resident notification coordinated if exposure confirmed
- If negligence found, enforcement escalation triggered
- Breach summary published in quarterly public update

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4. Enforcement Escalation Ladder

Enforcement follows a structured ladder — predictable, documented, and legally defensible. This prevents both under-enforcement and weaponization.

Level	Trigger	Consequence
Level 1 — Notice	First disclosure deficiency or minor TDS gap	Written compliance notice, 30-day cure period
Level 2 — Warning	Failure to cure after Level 1, or moderate violation	Formal warning, 15-day cure, public registry notation
Level 3 — Suspension	Repeated non-compliance or undisclosed inference found	Suspend county contract/infrastructure access pending review
Level 4 — Termination	Deliberate concealment, covert harvesting confirmed	Contract termination, procurement disqualification (up to 5 years)
Level 5 — Civil Penalty	Violations causing resident harm	Civil fines: $1,000–$10,000/day per violation (each day = separate offense)
Level 6 — Injunction	Ongoing harm, entity refuses compliance	Seek injunctive relief through Circuit Court
Level 7 — Referral	Evidence of criminal conduct	Refer to State Attorney or U.S. Attorney with full documentation

Civil fine range modeled after Illinois BIPA ($1,000 negligent / $5,000 intentional per violation).

Miami-Dade's daily accumulation model creates strong deterrence for ongoing violations without requiring federal authority.

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5. Year-One Implementation Roadmap

Timeline	Milestone	Deliverable
Day 1	Executive Order Issued	DITCO formally established by mayoral authority
Days 1–30	Interim Standards Published	Disclosure framework, TDS template, complaint portal launched
Days 30–60	Registry Portal Live	Public-facing entity registration system operational
Days 60–90	Procurement Integration	All new county contracts include DITCO compliance certification requirement
Month 4	First Audit Cycle Begins	Highest-risk category entities: biometric retention, undisclosed inference
Month 6	First Enforcement Actions	Compliance notices issued where violations identified; outcomes logged
Month 9	Interim Public Report	First quarterly transparency update published
Month 12	Annual Cognitive Privacy Report	Full Year 1 report: cases, outcomes, trends, standards update

6. Safeguards Against Misuse of Enforcement Power

A strong enforcement office can itself become a political weapon if not properly constrained. This framework builds in structural safeguards:

Safeguard	Mechanism
Documented Procedures	All enforcement actions follow written protocols available to the public
Due Process	Covered entities receive written notice, response opportunity, and appeal rights before any punitive action
Judicial Review	Enforcement decisions subject to Circuit Court review
Independent Audit	DITCO itself subject to annual review by Miami-Dade Inspector General
Transparency Reports	All enforcement categories published annually — prevents selective enforcement
Anti-Retaliation	Whistleblower and resident complainant protections codified in ordinance
No Political Targeting	Enforcement triggered by documented violation, not entity identity

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Total Projected Offset (Year 3+)	$350,000 – $1,050,000 / year

Net cost to county by Year 3 estimated at $0 – $500,000 annually — comparable to any mid-sized regulatory compliance division.

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7. Peer Benchmarks & Legislative Comparisons

This framework does not exist in isolation. It builds on — and in key areas surpasses — existing state and local AI governance models:

Jurisdiction / Law	What It Does	Where DITCO Goes Further
Illinois BIPA (2008)	Biometric data consent and civil right of action	DITCO adds cognitive inference, audit authority, and county procurement leverage
Colorado AI Act (2024)	High-risk AI disclosure and impact assessments	DITCO adds enforcement teeth via contract suspension and infrastructure access denial
Texas CUBI Act (2023)	Biometric identifier consent and deletion	DITCO extends to AI inference beyond direct biometric capture
EU AI Act (2024)	Risk-tiered regulation of AI systems	DITCO adapts risk-tier logic to sub-state jurisdiction using procurement authority
NYC Local Law 144 (2023)	Bias audits for AI hiring tools	DITCO covers broader resident impact categories beyond employment
Miami-Dade DITCO (Proposed)	Full cognitive privacy + AI governance + enforcement	Most comprehensive county-level AI governance framework in the U.S.

If enacted, Miami-Dade DITCO would be the first county-level office in the United States specifically dedicated to neural data sovereignty and AI cognitive privacy enforcement.

8. Economic Model & Revenue Pathways

DITCO is not a pure cost center. Responsible structuring creates revenue offsets:

Revenue Source	Estimate
Entity Registration Fees (tiered by size)	$200,000 – $400,000 / year at scale
Civil Penalty Revenue	Variable — offset into resident protection fund
Federal & State Grant Funding (AI governance)	$100,000 – $500,000 available through NIST, DOJ programs
Technology Compliance Certification Fees	$50,000 – $150,000 / year

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Closing: Why This Office Must Exist

Every framework that does not name its enforcement mechanism is an aspiration. Every ordinance without a compliance office is a press release. Miami-Dade residents deserve more than aspirations and press releases.

DITCO is the proof that this administration takes mental privacy seriously — not as a slogan, but as an operational commitment. It is the difference between policy that sounds good and policy that protects people.

Technology does not wait. Vendors do not self-regulate. Federal gridlock is not an excuse for county inaction. Miami-Dade will lead — with structure, with enforcement, and with a resident-first mandate that has teeth.

Mental Privacy Is Not Negotiable.
Innovation is welcome in Miami-Dade. Exploitation is not.
DITCO is how we enforce that line.

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