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**From:** Diaz-Greco, Gilma M. (COE)  
**Sent:** Tuesday, September 15, 2015 10:03 AM  
**To:** Sanchez, Rodzandra (COE)  
**Subject:** Brian Andrews, Managing Partner, The News Directors (Lobbying) INQ 15-209

INQ 15-209 Andrews

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**From:** Brian Andrews [mailto:brian@thenewsdirectors.com]  
**Sent:** Monday, September 14, 2015 2:57 PM  
**To:** Centorino, Joseph (COE)  
**Cc:** Diaz-Greco, Gilma M. (COE); Perez, Martha D. (COE); Sanchez, Gerald (CAO)  
**Subject:** Re: INQ 15-209 Brian Andrews, Managing Partner, The News Directors (Lobbying)

Thank you for your assistance with this.

Have a great day!

Brian Andrews  
Managing Partner

The News Directors  
(305) 906-1030  
[www.thenewsdirectors.com](http://www.thenewsdirectors.com)

On Sep 14, 2015, at 12:28 PM, Centorino, Joseph (COE) <[CENTORI@miamidade.gov](mailto:CENTORI@miamidade.gov)> wrote:

Mr. Andrews:

You have inquired in your capacity as Managing Director of The News Directors, a registered County vendor, regarding whether your company may send an advertising flyer for an upcoming training class to various employees of Miami-Dade County. It is my understanding that your company has no current contract with the County, and that there is no pending RFP, RFQ, bid or other anticipated solicitation by the County regarding such services.

Under these circumstances, Section 2-11.1(s) of the County Ethics Code would not require that a principal of your company register as a lobbyist, since you are not attempting to influence any foreseeable decision to be ultimately made by the Mayor, County Commission or other County board. If the proposed activity involves no more than an advertisement to employees of the County, the County Code does not require registration. I would suggest, however, that if, in the context of interacting with County officials or employees in the class, there are any plans to actively solicit a County contract, then you should ask for an opinion from this office regarding the same issue prior to engaging in such activity.

Sincerely,

Joseph M. Centorino  
Executive Director and General Counsel  
Miami-Dade Commission on Ethics and Public Trust

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**From:** Brian Andrews [<mailto:brian@thenewsdirectors.com>]  
**Sent:** Monday, September 14, 2015 9:54 AM  
**To:** Centorino, Joseph (COE) <[CENTORI@miamidade.gov](mailto:CENTORI@miamidade.gov)>  
**Subject:** Opinion Needed

Hi Joe:

Because I want to make sure we are completely and 100 percent doing things correctly, I wanted to ask you for an opinion if it would be proper for us to send this flier advertising our upcoming training class for law enforcement to various employees of Miami-Dade County government.

I am asking because I recall our conversation about there being a very fine line between lobbying and advertising, since my company is a registered vendor of Miami-Dade County and we are seeking to do business with the county by having employees come learn at our class. I would not want a situation where someone in the county who may have an issue with our company making an ethics complaint against us for emailing this flier directly to department heads.

Again, in an abundance of caution, I wanted to get the official word from you.

Thank you,

Brian Andrews  
Managing Partner

The News Directors  
(305) 906-1030  
[www.thenewsdirectors.com](http://www.thenewsdirectors.com)

<TV Interview Bootcamp.pdf>