

## Sanchez, Rodzandra (COE)

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**From:** Diaz-Greco, Gilma M. (COE)  
**Sent:** Thursday, November 10, 2016 10:40 AM  
**To:** Sanchez, Rodzandra (COE)  
**Subject:** Juan Zapata, Miami-Dade County Commissioner (DIST 11) (2-year Rule) INQ 16-251

INQ 16-251 Zapata

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**From:** Centorino, Joseph (COE)  
**Sent:** Thursday, November 10, 2016 9:40 AM  
**To:** Turay, Radia (COE) <Radia.Turay@miamidade.gov>; Perez, Martha D. (COE) <perezmd@miamidade.gov>; Diaz-Greco, Gilma M. (COE) <Gilma.Diaz-Greco@miamidade.gov>  
**Subject:** INQ 16-251 Juan Zapata, Miami-Dade County Commissioner (DIST 11) (2-year Rule)

Juan Zapata, Miami-Dade County Commissioner (DIST 11) inquired concerning restrictions that would apply to him under Subsection 2-11.1(q), the “two-year rule,” following the completion of his term of office in November 2016. Commissioner Zapata did not run for re-election and will be out of office when his successor is sworn in. I discussed with Commissioner Zapata the two-year rule requirement that he refrain from lobbying for two years from the termination date of his term of office. I indicated to him that the restrictions on his interactions with County officials and personnel were stricter than those on outside individuals in terms of when he would be considered a lobbyist, and that it would be advisable in any situation where he was

Unsure of whether the rule applied, he should seek an opinion prior to lobbying. I did inform him that he should refrain from meeting with any County boards or officials in situations where he might be considered a lobbyist for a period of two years. However, he would be free, as a citizen, to appear before County boards or officials to express personal opinions on behalf of himself alone, as that would not be considered lobbying, but an exercise of his constitutional right to petition his government. I informed him that he would be able to be retained as a consultant or employee of a company doing business with the County, provided he did not himself engage in any lobbying activities. In regard to his appearing on behalf of a non-profit group, I suggested that he seek an opinion prior to doing so because the particular circumstances of the retention would need to be considered. I also informed him that under Subsection 2-11.1(h), he should be careful not to divulge confidential information, to which he was privy as a Commissioner, for the benefit of himself or any other party.

### *Joseph M. Centorino*

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