
INQ 16-86 Aaronson

From: Centorino, Joseph (COE)
Sent: Tuesday, March 15, 2016 2:03 PM
To: 'Leah Aaronson' <laaronson@bilzin.com>
Cc: Turay, Radia (COE) <Radia.Turay@miamidade.gov>; Perez, Martha D. (COE) <perezmd@miamidade.gov>; Diaz-Greco, Gilma M. (COE) <GDIAZGR@miamidade.gov>
Subject: INQ 16-86 Leah Aaronson, Esq., Bilzin Sumberg Baena Price & Axelrod LLP

Ms. Aaronson:

You have inquired on behalf of the Chairman of the Board of a not-for-profit school represented by your firm, as to whether that individual needs to register as a lobbyist in order to speak with his County Commissioner in connection with pending road improvements funded by the school. The Chairman is a volunteer and will receive no special compensation or reimbursement for his work on behalf of the Board.

Subsection 2-11.1(4) of the County Ethics Code provides that an individual appearing as a representative of a not-for-profit charitable organization without special compensation or reimbursement to express support of opposition to any time, must register as a lobbyist with the Clerk, but is not required to pay any registration fee to the County. Such an individual, however, is still required to complete the Lobbyist Ethics Course provided by this agency pursuant to Section 2-11.1(20(d)).

If you have any further questions concerning this matter, please let me know.

Sincerely,

Joe Centorino

Joseph M. Centorino

Executive Director and General Counsel
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From: Leah Aaronson [<mailto:laaronson@bilzin.com>]
Sent: Friday, March 11, 2016 3:52 PM
To: Centorino, Joseph (COE) <CENTORI@miamidade.gov>
Subject: Ethics Opinion - Whether Volunteer for Not-for-Profit Needs to Register as Lobbyist

Good afternoon,

Thank you for speaking to me on the phone regarding my question about whether a volunteer board member at a not-for-profit must register as a lobbyist. Pursuant to your request to submit my question in writing, the details are as follows:

We represent a not-for-profit school that is funding a road renovation. County regulations require a public hearing before the improvements can take place. The Chairman of the Board is not an employee of the not-for-profit but rather is a volunteer. He would like to speak to his commissioner about the public hearing to notify her of the positive improvements that the not-for-profit is doing in her district.

Section 2-11.1(s)(1)(b) lists several exemptions from registering as a lobbyist but the Chairman does not clearly fit into any of them, although a reading of the exemptions together indicate that he should not have to register. Also, as you indicated on the phone, (s)(4) states that he may be able to waive the registration fee but would still have to pay for and take the 4-hour course.

Can you please issue an opinion as to whether the Chairman can speak to his commissioner without registering as a lobbyist?

Thank you,

Leah Aaronson



Leah Aaronson
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