

Sanchez, Rodzandra (COE)

From: Diaz-Greco, Gilma M. (COE)
Sent: Friday, May 05, 2017 10:01 AM
To: Sanchez, Rodzandra (COE)
Subject: Federico Endara, former MDC employee, zoning specialist (Two-Year Rule) INQ 17-133
Attachments: faq_2-year-rule_6-14.pdf; RQO 11-26 Goldstein.pdf

[INQ 17-133 Endara](#)

From: Centorino, Joseph (COE)
Sent: Friday, May 05, 2017 9:56 AM
To: 'endara50@hotmail.com' <endara50@hotmail.com>
Cc: Kogon, Nathan (RER) <nathan.kogon@miamidade.gov>; Turay, Radia (COE) <Radia.Turay@miamidade.gov>; Perez, Martha D. (COE) <perezmd@miamidade.gov>; Diaz-Greco, Gilma M. (COE) <Gilma.Diaz-Greco@miamidade.gov>; Sanchez, Gerald (CAO) <Gerald.Sanchez@miamidade.gov>; Kirtley, Eddie (CAO) <Eddie.Kirtley@miamidade.gov>
Subject: INQ 17-133 Federico Endara, former MDC employee, zoning specialist (Two-Year Rule)

Mr. Endara:

You have inquired concerning the interpretation of Section 2-11.1(q) of the Miami-Dade County Ethics Code, commonly known as the two-year rule, and whether it would prevent you from appearing on behalf of another party at a quasi-judicial hearing in the County. You are a former County employee in the County Zoning Department, where you worked as a zoning hearing specialist. You retired from you County position on June 26, 2015. You are, therefore, covered by Section 2-11.1(q) and will be covered by until the expiration of the two-year period following your retirement. The two-year rule prohibits former employees subject to it from lobbying the County for a period of two years following the end of their County employment.

However, Section 2-11.1(s) of the County Ethics Code specifically excludes from the definition of lobbying, "attorneys or other representatives retained or employed solely for the purpose of representing individuals, corporations or other entities during publicly noticed quasi-judicial proceedings where the law prohibits ex-parte communications. If you limit your appearances to quasi-judicial hearings in the County, where ex-parte communications are prohibited by the Jennings Rule, then you are permitted by this provision to make an appearance at such a hearing on behalf of another individual. Appearances before County personnel outside of such hearings are not covered by this exceptions. I have attached to this inquiry RQO 11-26, as well as the Frequently Asked Questions summary on our website, both of which confirm this exception to the rule.

Sincerely,

Joe Centorino

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