

February 25, 2011

Jose Villalobos, Esq.
Akerman, Senterfitt
One South East Third Avenue
25th Floor
Miami, Florida 33131

RE: PHT State and Federal Lobbying Contracts and RFP 09-5254-A

Dear Mr. Villalobos:

As you know, the Miami-Dade County Inspector General (OIG) raised concerns over the fact that your law firm, Akerman, Senterfitt, (AS) presently serves as contract lobbyists (under RFP(s) 06-5133 and 07-5164) to the Public Health Trust (PHT) while you also represent Armor Corrections Health Services (Armor) with regard to RFP 09-5254-A.

By correspondence dated February 16, 2011, Mr. Michael Abrams from your office requested guidance from the Executive Director of the Ethics Commission (COE) concerning this matter.

By way of background, County Ordinance No.00-64, provides that “no person or entity that received compensation from the County for lobbying on behalf of the County or any of its agencies or instrumentalities at either the state, national or municipal level shall represent any entity in any forum *to support a position in opposition to a position of the County* unless the Board grants a specific waiver for a specific lobbying activity.” Additionally, County Resolution No. 56-10 requires all County contract lobbyists to obtain a waiver from the Board for any actual or perceived conflicts of interest. (emphasis added)

We are advised that the RFP Armor is pursuing involves the rendering of health care services to inmates at County correctional facilities. We reviewed the scope of services portions of both the State and Federal lobbying contracts AS has with the PHT and conferred with the County Attorney’s office.

We do not see where AS's representation of Armor is in opposition to or conflicts with any current interest or position of the County/PHT or any issue assigned to AS under its lobbying contract with the PHT. AS is reminded of its continuing affirmative duty to promptly bring to the County's attention any future actual or perceived conflict that may arise.

If you have any questions or would like to discuss this matter further please feel free to call me at (305) 350-0609 or e-mail me at murawsk@miamidade.gov.

Sincerely,

Michael P. Murawski

Cc:

Michael I. Abrams, Esq.

Christopher Mazzella

MPM/rs