



**Miami-Dade Commission on Ethics & Public Trust**

**Report of Inquiry**

**CASE  
CLOSED**

Investigator: Sylvia Batista

<b>Case:</b> PI15-013	<b>Case Name:</b>	<b><u>Date Opened:</u></b> Date: <u>5/26/2015</u>	
<b>Complainant(s):</b> N/A	<b>Subject(s):</b> Unregistered lobbying by Roosevelt Bradley.	<b>05/06/15</b>	

**Allegation(s):**

The COE received information that M-D Transit employees Sandy Amores (Amores) and Hugh Chen (Chen) may have knowledge concerning unregistered lobbying by Roosevelt Bradley (Bradley) on the bus RFP.

The COE initiated an inquiry to determine whether Bradley has lobbied on the subject RFP, and whether he is registered to do so.

**Relevant Law:**

Miami-Dade County Conflict of Interest and Code of Ethics Ordinance Sec. 2-11.1(s) (2)  
*Lobbying.*

All lobbyists shall register with the City Clerk within three (3) business days of being retained as a lobbyist or before engaging in any lobbying activities, whichever shall come first.

**Investigation:**

**Lobbyist registration:**

Bradley is a Miami-Dade County registered lobbyist for multiple principals. Bradley's last registration dated 02/03/15 was for principal, Atlantic Pacific. Bradley is not registered to lobby on behalf of any of the bidders on the subject RFP.

**Interviews:**

**05/12/15 – Sandy Amores, Chief, Transit Maintenance Control –**

Amores was contacted about his knowledge concerning lobbying by Bradley on the bus contract. Amores explained that the bus contract is to change the Miami-Dade County infrastructure from diesel to compressed natural gas (CNG) buses. It is RFP-00096, which is currently under the Cone of Silence. The contract requires CNG buses. Three proposals have been submitted in response to RFP-00096. The bidders are Clean Energy, Trillium and Nopetro. In their bids they quote how much it would cost to supply 300 buses and which manufacturer of buses would be used. Last week the transit department had staff at the American Public Transportation Association's trade show held in Texas. During the show, Amores called a transit employee who was at the trade show and the employee told him that there was a bus salesman from Florida who represents a bus manufacturing company named Gillig Corporation which recently sold and delivered buses to MDT. Amores said that the employee told him that the representative had made a comment that Amores is delaying the RFP in order to provide time for Nopetro to meet "Buy American Act" requirements. Buy American is a federal requirement that a percentage of the buses built using federal dollars must be built in America. Amores advised that the allegation is that he was delaying the RFP to give Nopetro the opportunity to meet all the requirements, and that he had signed a contract to go work for them, something which Amores says is not true. Amores said that he called the OIG's office and spoke to Peter Liu to tell him about the allegation.

Amores said that he has not spoken to Bradley about the subject RFP; the RFP has a zillion lobbyists, but he knows Bradley is not one of them. Amores assured that the allegation is not true. Amores said that he has spoken to Bradley about other things, but never about this particular procurement and he has never asked him anything about it. Amores said that he cannot recall when he last spoke to Bradley. Bradley comes around to BCC meetings and has never spoken to him about this contract. They are presently under the Cone of Silence and cannot speak to anyone about this RFP. Amores is not a member of the selection committee. He is a member of the technical committee which responds to questions about the technical aspects of the RFP. This RFP is being managed by ISD and they have a selection committee and a technical committee which meet whenever ISD decides to meet. They go to meetings which are open to the public. They've held 2 or 3 meetings on it so far. The technical committee has not been asked any technical questions yet. At no time has Bradley contacted him to inquire on this RFP or offer him anything.

Amores said that he does not play games—all is above board. He has been with the county for

37 years and has always been in the transit department.

**05/12/15 - Hugh Chen, Deputy Director of Operation, Miami-Dade County Transit –**

Chen said that he is on the selection committee of RFP 00096. Chen said that he has not been lobbied by Bradley nor has he had any conversations with him in regard to the bus RFP. He does not know anything about Bradley lobbying on this contract. Chen has not spoken to Bradley about this RFP. Bradley does not come to him about any particular procurement. Chen said that he has seen Bradley at shows, but does not deal with him as a lobbyist. They say hello and chit chat for a bit, but he does not come to him regarding specific projects.

Chen advised that Amores had spoken to the OIG's office because people were making accusations that he was working for one of the vendors, something which is not true. They are very cautious about these matters.

**05/20/15 – Rita Silva, Acting Chief Policy and Legislation, ISD Procurement Management –**

Rita Silva (Silva) is the Chair of the Selection Committee on the subject RFP. Silva said that she has observed Bradley at the board meeting when the item was heard. Bradley is a lobbyist, but not on this RFP. He has not approached her, nor has anybody advised her that he has approached them. When she goes to the board she has seen him there. She cannot say that he is there on behalf of anybody. This RFP is in the evaluation stage, therefore, who would he be lobbying at this stage? The selection and technical meetings are open to the public and she has not seen him there. Approximately 25 to 30 people attend the meetings. Silva said that she observed Bradley when the item went to the board to request to advertise, but he may not have been there for that.

Silva agreed to furnish the COE with copies of the oral presentations forms to see who has registered to lobby on this item. When they register for oral presentations they don't have to pay the fee and can always amend later and give her a new form.

This RFP is for MDT and the second portion is for PW and Waste Management. The bidder is supposed to provide the infrastructure for the CNG, which is very different from what they presently have for diesel fuel. They also would upgrade the facilities and provide for 300 buses. It is a huge project which will cost approximately \$200 million.

**05/20/15 – Alex Heckler and Diana Mendez of LSN Partners –**

Alex Heckler and Diana Mendez are lobbyists for Integrys Transportation Fuel d/b/a Trillium (Trillium). Trillium is one of the bidders on RFP 00096. Heckler advised that he takes the Cone of Silence very seriously. Heckler explained that the process of this RFP has gone on for a very long time. Their client, Trillium, does buses for New York City, New York State and Boston. Clean Energy is also a big player in this field, and Nopetro has also been involved on a local level. Heckler explained that he has not seen anybody lobbying on this. When a big transit contract is involved, clients will call with rumors, but these are only rumors. They could involve a company trying to build buses.

Heckler said that he has worked with Bradley on the same team and on the opposite team in the past. To his knowledge, Bradley is not a lobbyist on this contract at all. Heckler said that he has had conversations with him regarding a bus procurement, but not this one. Bradley is an upright guy. Bradley has helped others before on bus manufacturing, but this one is more about CNG.

Heckler explained that Bradley is more strategic. On some teams he is a Disadvantaged Business Enterprise where you don't have work until the contract is awarded. On this one, Bradley is not a lobbyist. Pushing to reject all bids makes no sense because there are no other companies that do this kind of work. Bradley is not a lobbyist on this one.

Heckler said that he spoke to Bradley last week and if he was lobbying on this he would be helping them. Note that it was 18 to 20 months before the Cone of Silence came into effect. Maybe the informant has confused this with a different bus procurement. He is not lobbying on that one either. He has spoken to Bradley on that bus procurement, but they have already been recommended.

**05/21/15 – Ron Book of Ron L. Book, P.A. -**

Ron Book (Book) is the lobbyist for Clean Energy. Book said that his client told him of rumors circulating at a recent conference that someone from the county involved in the process was trying to unsettle the process in order to benefit a bidder that he wanted to take a job with. The rumors were really disconcerting to his client that somebody currently working on this RFP was leaving and taking a job with another entity and that the process was going to get stacked. Book said that he did not share this information with anyone. He has not heard anything about Bradley lobbying anyone on this contract. He does not have any information to indicate this. Book said that his client, Clean Energy, can call with any information should they have any. Book maintained that he has not heard anything about Bradley being involved in the process. He has little faith and confidence in the other lobbyists involved in this.

**05/21/15 - Roly Marante of Strategic Access Group –**

Roly Marante (Marante) is the lobbyist for Nopetro LLC. Marante said that he has obviously talked to a colleague and they have internal conference calls on this topic on the Nopetro side. Marante said that he was Rebecca Sosa's former Chief of Staff. He said he hopes that everyone plays by the rules. You see people lobbying and you wonder whether they are registered or not. Marante said that he is only working with his team on this and doesn't know whether Bradley is working with another group, but he is not working with him. Marante said that he has not heard any rumors that Bradley is lobbying anyone on this RFP.

**05/21/15 – Michael Llorente of LNS Partners –**

Michael Llorente (Llorente) is one of the lobbyists for Trillium. Llorente said that he knows Bradley, but to his knowledge Bradley is not lobbying on this contract. He has not seen him involved in this process. Llorente said that his own personal involvement is limited, but his impression is that Bradley has no involvement in this procurement.

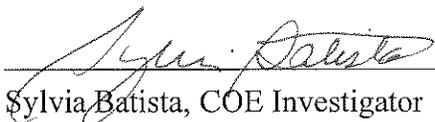
Llorente said that “sometimes people try to use the COE as a sword to advance their personal agendas; maybe that is what is happening here.”

**05/22/15 – Ysela Llorc, Director, Miami-Dade Transit –**

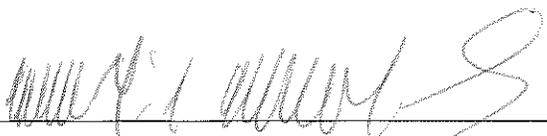
Miami-Dade Transit Director, Ysela Llorc (Llorc), was interviewed regarding her knowledge of any lobbying activity by Bradley in connection to the subject procurement. Llorc said that to the best of her knowledge Bradley is not lobbying anyone on the subject procurement. Llorc said that Bradley was a registered lobbyist for Landmark Development which was working on a project involving the construction of a building. Bradley wanted a letter stating that MDT serviced a bus stop in front of the building. Llorc has no further knowledge regarding Bradley’s lobbying activities.

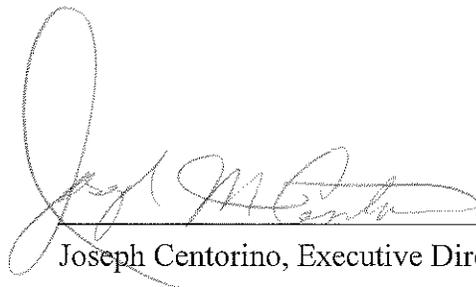
**Conclusion:**

This inquiry did not reveal any evidence that Roosevelt Bradley is engaged in unregistered lobbying in connection with RFP 00096. For this reason, this matter is closed with no further action.

  
Sylvia Batista, COE Investigator

Approved by:

  
Michael Murawski, Advocate

  
Joseph Centorino, Executive Director

Date: 5/26/2015

Date Closed: 5/26/15