



Miami-Dade Commission on Ethics & Public Trust

Report of Inquiry

Investigator: Breno Penichet

Case Number PI 16-37	Case Name: Lobbying	Date Open: July 25, 2016	CASE CLOSED Date: 10/20/2016
Complainant(s): Anthony Imbesi / Lynne Bloch-Mullen	Subject(s): Douglas M. Rudolph		

Allegation(s):

The COE received a request for investigation into the allegations made by Anthony Imbesi, concerning the possible violation of the Lobbyist registration requirements by Douglas M. Rudolph.

Relevant Ordinances:

The Conflict of Interest and Code of Ethics Ordinance, Sec. 2-11.1 (s) *Lobbying definition, requirements regarding registration and disclosure of expenses.*

Investigation:

Interviews

The COE received information from Miami-Dade State Attorney's Office Public Corruption Task Force (SAOPCTF) concerning a possible unregistered lobbying allegation. The SAOPCTF had received a letter from the Bay Harbor city council on 07-19-2016, alleging several acts including possibly unregistered lobbying.

According to the information the unregistered lobbying may have been committed by an individual identified as, Douglas M. Rudolph (Rudolph).

The alleged lobbying was allegedly conducted in order to obtain favorable treatment from the Council for a person identified in the letter as Joseph Imbesi (Imbesi).

COE Investigator Penichet was advised to contact SAO Investigator Michael D'Ambrosia lead investigator in a parallel criminal investigation.

After speaking to D'Ambrosia, reviewing the information uncovered, and interviews, it was determined Rudolph and Imbesi were involved in a business relationship and no lobbying was involved. (See attached SAOPCTF Report).

Document/Audio/Video Review:

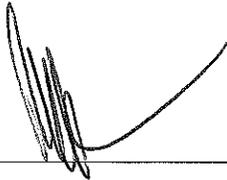
1. **Copy of final report** from SAOPCTF Case# IN-16-18 Case Subject Douglas Marc Rudolph.
2. **Consulting Agreement** between "Rudolph Entertainment, Inc. a Florida Corporation and Bal Harbor Beach Club, Inc. and Joseph Imbesi"
3. **Consulting Agreement** between "Rudolph Entertainment, Inc. a Florida Corporation and Flamingo Way Enterprises, Inc. and Joseph Imbesi"
4. **Consulting Agreement** between "Bay View Partners, a Texas General Partnership and, Bal Harbor Beach Club Inc. and Joseph Imbesi"

Conclusion(s):

As a result of the interviews and a review of the documents provided, it appears that Rudolph did not attempt to lobby or influence the outcome of any vote or action by the Bal Harbor Village Council.

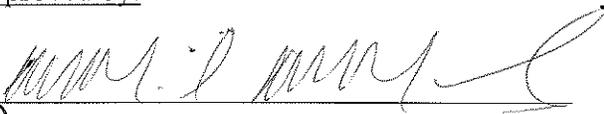
Advocate Michael Murawski advised that no further action would be taken since there does not appear to be any ethics-related violation. Accordingly, it is recommended that the above case be closed.

(Signature)

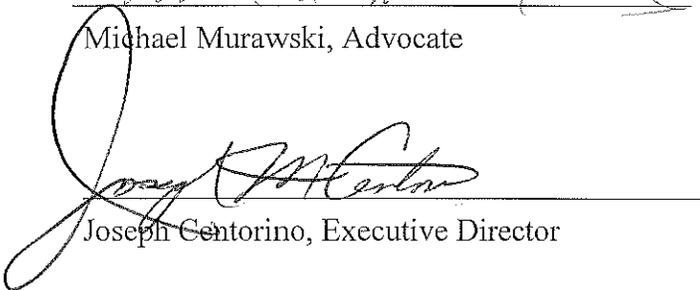


Breno Penichet, COE Investigator

Approved by:



Michael Murawski, Advocate



Joseph Centorino, Executive Director

10/20/16
Date Closed