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MIAMI-DADE
COMMISSION ON ETHICS & PUBLIC TRUST

In re:
Eston E. "Dusty" Melton

C 17-12

PUBLIC REPORT AND FINAL ORDER

Giselle Cushing, Market Vice-President for Humana South Florida, filed the above-referenced complaint against Respondent, Eston E. "Dusty" Melton (Melton) alleging that Melton lobbied County personnel and County Commissioners on behalf of Delta Dental Insurance Program (Delta Dental), without being registered, in violation of Section 2-11.1(s) of the Miami-Dade County Conflict of Interest and Code of Ethics Ordinance (Ordinance).

The Ordinance states, in pertinent part, that a lobbyist is a person, firm or corporation *employed or retained by a principal* who seeks to encourage the passage, defeat or modification of [official] action... [Furthermore], a lobbyist shall register with the Clerk of the Board of County Commissioners...". The Ordinance does not define "principal."

Investigation revealed Melton lobbied on behalf of Delta Dental regarding RFP No. 00342- the County Employee Group Dental Insurance Program. Melton has been registered to lobby since 2008, for principal The Comprehensive Companies (TCC) on insurance and financial issues. TCC, in turn, has a consulting relationship with Delta Dental, assisting the insurance company with the County's procurement of dental services. Consequently, Melton was retained by principal TCC to represent TCC in obtaining a benefit for its client, Delta Dental, on an insurance issue.

On October 12, 2017, in closed session, the Ethics Commission held a probable cause hearing and found that there was insufficient evidence to substantiate a claim that Melton violated Section 2-11.1(s) of the County's Ethics Code- the Lobbying Ordinance, as Melton was properly registered to lobby on behalf of a principal as required by the

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Ordinance, even though principal TCC was not the primary beneficiary of the lobbying activity.

In open session, the Ethics Commission voted unanimously to find No Probable Cause and dismissed the case.

Wherefore it is:

ORDERED AND ADJUDGED that COMPLAINT C17-12 against Respondent, Eston E. "Dusty" Melton, is hereby dismissed.

DONE AND ORDERED by the Miami-Dade County Commission on Ethics & Public Trust in public session on October 12, 2017.

MIAMI-DADE COUNTY COMMISSION ON
ETHICS & PUBLIC TRUST

By:



H. Jeffrey Cutler, Esq.
Vice-Chair

Signed on this
Date: 10/19/2017