

FILE COPY

CLERK OF THE BOARD
2018 OCT 22 PM 2:00

CLERK, CIRCUIT & COUNTY
MIAMI-DADE COUNTY, FLA.
#1



APPROVED 10/10/2018

CHAIRMAN'S INITIALS: HK

**MIAMI-DADE
COMMISSION ON ETHICS & PUBLIC TRUST**

LETTER OF INSTRUCTION

To: Ivette Arango O'Doski

From: Miami-Dade County Commission on Ethics and Public Trust

Re: C18-30-07

Date: October 2018

An Ethics Complaint was filed against Respondent, Ivette Arango O'Doski (O'Doski), for violating Section 2-11.1(s) of the Miami-Dade County Conflict of Interest and Code of Ethics Ordinance entitled, "Lobbying."

O'Doski admitted that she lobbied at a meeting with County officials and County personnel on May 10, 2017, on behalf of Trafficware. At the time of the meeting, O'Doski was registered with the Clerk of the Board under an annual general registration dated April 4, 2017. She failed, however, to file the Lobbyist Activity Authorization Form and the Joint Contingency Fee Affidavit prior to lobbying County officials and personnel at the meeting held on May 10, 2017. O'Doski realized that there was a deficiency in the lobbyist filing from her office and within a couple of weeks after the meeting and she became compliant on June 1, 2017, at least one year prior to hearing from our office.

O'Doski stipulated to a finding of Probable Cause and agreed to accept a Letter of Instruction.

On September 12, 2018, the Ethics Commission accepted the Stipulation, dismissed the Complaint, and ordered that a Letter of Instruction be issued to the O'Doski, pursuant to Code of Miami-Dade County, Article LXXVIII, §2-1074(s), as it appears that the alleged violation was "inadvertent, unintentional, or insubstantial."

WHEREFORE, the Commission on Ethics and Public Trust issues this Letter of Instruction.

Section 2-11.1 (s) of the Miami-Dade County Conflict of Interest and Code of Ethics Ordinance states, in part:

"All lobbyists shall register with the Clerk of the Board of County Commissioners within five (5)

business days of being retained as a lobbyist or before engaging in any lobbying activities, whichever shall come first. Every person required to so register shall:

...

(c) Prior to conducting any lobbying, all principals must file a form with the Clerk of the Board or County commissioners, signed by the principal or the principal's representative, stating that the lobbyist is authorized to represent the principal. The principal and the lobbyist must also submit a joint affidavit stating that the principal has not offered and the lobbyist has not agreed to accept any contingency or success fees as defined in subsection (s)(7)...."

Our review of Miami-Dade County's lobbyist registration records showed that O'Doski filed the requisite lobbyist form and affidavit, albeit belatedly, and has come into compliance with the lobbyist filing requirement. It is our hope that the issuance of this Letter of Instruction and going through the complaint process will impress upon O'Doski and other similarly situated individuals, the importance of compliance with the Ethics Code. We are hopeful that she has learned from this experience and will use this Letter of Instruction to guide her future conduct.

