

## Sanchez, Rodzandra (COE)

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**From:** Diaz-Greco, Gilma M. (COE)  
**Sent:** Monday, May 14, 2018 10:23 AM  
**To:** Sanchez, Rodzandra (COE)  
**Subject:** City of Miami Lobbyists, RE: City revised January 2018 ethics course requirement, Lobbying (s), Miami Code Section 2-654, INQ 18-118

INQ 18-118 Carballosa

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**From:** Perez, Martha D. (COE)  
**Sent:** Monday, May 14, 2018 10:11 AM  
**To:** mcarballosa@flapartners.com  
**Cc:** Centorino, Joseph (COE) <Joseph.Centorino@miamidade.gov>; Murawski, Michael P. (COE) <Michael.Murawski@miamidade.gov>; Diaz-Greco, Gilma M. (COE) <Gilma.Diaz-Greco@miamidade.gov>; Turay, Radia (COE) <Radia.Turay@miamidade.gov>  
**Subject:** City of Miami Lobbyists, RE: City revised January 2018 ethics course requirement, Lobbying (s), Miami Code Section 2-654, INQ 18-118

Dear Ms. Carballosa,

You inquire whether lobbyists in the City of Miami who took the ethics course last year are required to take the refresher course this year.

### Background

The partners and associates at Floridian Partners LLC lobby before the City of Miami. They took the lobbyist training ethics course in 2017. They would like to know whether the amended City of Miami lobbyist ordinance requires them to take the refresher course this year.

### Analysis

The City of Miami amended §§ 2-651- 2-658 of Article VI, *Lobbyist*, effective January 1, 2018. Section 2-654 (b) states in part, “Lobbyists who have completed the initial Ethics Course mandated by the preceding sentence and have continuously registered as a Lobbyist thereafter shall be required to complete a refresher Ethics Course every two (2) years. Each Lobbyist who has completed a refresher Ethics Course shall submit to the City Clerk a certificate of completion within sixty (60) days after registering as a Lobbyist.” All lobbyists’ registrations expire December 31<sup>st</sup>. See §2-654 (a), Miami Code.

This matter has been discussed with City of Miami Assistant City Attorney Xavier Albán who has advised that the revised Lobbyist ordinance is **prospective**. See INQ 18-29. Consequently, if the partners and associates took the Ethics Course in 2017 and have re-registered to lobby in 2018, they will be required to take the refresher Ethics Course this year which will satisfy their ethics course requirement for the next two years.

This opinion is based on the facts as presented by the requestor. If any of these facts change, please contact us.

Sincerely,

**Martha D. Perez**  
Staff Attorney

MIAMI-DADE COUNTY COMMISSION ON ETHICS & PUBLIC TRUST  
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**From:** Sanchez, Rodzandra (COE)  
**Sent:** Friday, May 11, 2018 3:19 PM  
**To:** Mireya Carballosa <[mcarballosa@flapartners.com](mailto:mcarballosa@flapartners.com)>  
**Cc:** Perez, Martha D. (COE) <[Martha.Perez2@miamidade.gov](mailto:Martha.Perez2@miamidade.gov)>  
**Subject:** RE: City revised January 2018 ethics course requirement

Good Afternoon Ms. Caballosa,

I am going to cc: Ms. Perez, our Staff Attorney that will be able to answer your question.

Ty..

*Rodzandra Sanchez, MPA  
Administrative Officer  
Miami Dade Commission on Ethics and Public Trust  
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Suite 820  
Miami, Florida 33130  
(305) 350-0655*

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**From:** Mireya Carballosa [<mailto:mcarballosa@flapartners.com>]  
**Sent:** Friday, May 11, 2018 3:17 PM  
**To:** Sanchez, Rodzandra (COE) <[Rodzandra.Sanchez@miamidade.gov](mailto:Rodzandra.Sanchez@miamidade.gov)>  
**Subject:** City revised January 2018 ethics course requirement

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Good afternoon,

I needed to verify what I may have overlooked at the new rules within the City of Miami as far as not requiring to take the ethics course yearly. Can you verify for me that the City has taken the same rules as Dade County for refresher course every two years. The partners and associates in our office took the refresher course last year; we file annually the registration at the City so there has never been any lapse.

If the new rule is retroactive for those who took the refresher course last year then they won't have to register. However if this new rule commences January 2018 forward then I believe they are still required to take the course.

Please advise.

**Mireya Carballosa**

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