

Sanchez, Rodzandra (COE)

From: Diaz-Greco, Gilma M. (COE)
Sent: Friday, February 09, 2018 2:53 PM
To: Sanchez, Rodzandra (COE)
Subject: Ryan Parrent, Senior Counsel, Atos Corp. (Lobbying) INQ 18-39

INQ 18-39 Parrent

From: Diaz-Greco, Gilma M. (COE)
Sent: Friday, February 09, 2018 2:52 PM
To: 'ryan.parrent@atos.net' <ryan.parrent@atos.net>
Cc: Centorino, Joseph (COE) <Joseph.Centorino@miamidade.gov>; Murawski, Michael P. (COE) <Michael.Murawski@miamidade.gov>; Perez, Martha D. (COE) <Martha.Perez2@miamidade.gov>; Turay, Radia (COE) <Radia.Turay@miamidade.gov>
Subject: Ryan Parrent, Senior Counsel, Atos Corp. (Lobbying) INQ 18-39

Dear Mr. Parrent:

It was pleasure to speak with you over the phone recently and provide an overview of the Miami-Dade County lobbyist ordinance. This email will confirm our conversation and provide links where you can obtain additional information regarding lobbying in Miami-Dade County. My understanding is that you represent a company that has not lobbied in Miami-Dade before.

As we discussed, the County ethics code requires any party that lobbies on behalf of a principal (a company) to register as a lobbyist in Miami-Dade County. Section 2-11.1(s)(1)(b) of the County Ethics Code defines the term "lobbyist" broadly as:

- All persons or firms (paid or unpaid) employed or retained by a principal who seek to encourage the passage, defeat or modifications of:
 - o Any ordinance, resolution, action, decision of the County Commission
 - o Any action, decision recommendation of the County Mayor or any County board or committee
 - o Any action, decision or recommendation of County personnel
 - o The principal of an entity who lobbies on behalf of that entity

-During the time period of the entire decision-making process on such action, decision or recommendation, which foreseeably will be reviewed by the County Commission or a County board or committee.

Consequently, every person **lobbying** as defined above, on behalf of your company would need to register as a lobbyist, including the principal, employees, a consultant, or a firm hired by your company to lobby on its behalf.

The Commission on Ethics provides a 4 hour initial Ethics training course for lobbyists on a monthly basis. The dates for the training can be found at: <http://ethics.miamidade.gov/training.asp>. In the event of a compelling emergency, the COE occasionally provides the option of watching a video of the lobbyist training at our office.

Frequently asked questions about lobbying, as well as summaries of lobbying opinions provided by the Miami-Dade Ethics Commission can be found at: <http://ethics.miamidade.gov/lobbying.asp>.

The Miami-Dade County Clerk of the board provides online registration for lobbyists. Lobbyist registration can be completed at: <https://www8.miamidade.gov/Apps/COB/LobbyistOnline/home.aspx/Home.aspx>.

Please contact us if you have any additional questions.

Cordially,

Gilma (Mimi) Diaz-Greco
Staff Attorney



Miami-Dade Commission on Ethics and Public Trust
19 W. Flagler Street, Suite 820
Miami, FL 33130
Tel: (305) 579-2594
Fax: (305) 579-0273
gdiazgr@miamidade.gov
www.facebook.com/MiamiDadeEthics

From: Ethics (COE)
Sent: Friday, January 26, 2018 1:14 PM
To: Diaz-Greco, Gilma M. (COE) <Gilma.Diaz-Greco@miamidade.gov>
Subject: FW: Registration of Consultants and Sales Persons

Please handle this inquiry.

From: Parrent, Ryan [<mailto:ryan.parrent@atos.net>]
Sent: Thursday, January 25, 2018 3:54 PM
To: Ethics (COE) <ethics@miamidade.gov>
Subject: Registration of Consultants and Sales Persons

Dear Ethics Commission,

My name is Ryan Parrent. I am an attorney at Atos (an IT company). We are potentially going to do some work, or respond to an RFP, with Miami-Dade, and I wanted to get some feedback on some issues related to potential lobbying under Miami-Dade code. I called in, and was referred to this e-mail to get an official opinion on the below questions:

- 1) We have third party companies that we use as consultants to help us respond to public contracts. Do these third party companies have to be registered as lobbyists? If so, do we need to register as a client of the consultants?
- 2) After reading your code, it seems quite broad. It appears to include our internal sales people, who are just selling IT services in the normal course of business. We don't actually need to register them as lobbyists, since they are our employees in a sales function, correct? Or do we need to register them since they will have contact with the city? If so, do we just register our company? Or do we have to register each sales person?

If you could please let us know, so we can ensure compliance on our end, I would greatly appreciate it. Thank you very much.

Sincerely,

Ryan Parrent
Senior Counsel

4851 Regent Boulevard
Irving, Texas 75066
Phone: (972) 322-7207

