

JNQ 11-115



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

July 15, 2011

Roly Marante, Chief of Staff
Office of County Commissioner Rebeca Sosa
District 6
Stephen P. Clark Center
111 N.W. 1st Avenue
Miami, FL 33130

Dear Mr. *Roly* Marante:

You recently advised me that you will be leaving your position with County Commissioner Rebeca Sosa's office and you are inquiring about the applicability of the County's Two Year Rule once you separate from the County. As you know, this rule prohibits former county employees from lobbying Miami-Dade County government officials and employees for two years after the employee has left the employment of Miami-Dade County. In effect, this rule means you will be precluded from appearing before the County Commission and all other County board or committees if you are representing the interests of for-profit corporations. It further restricts your ability to meet one-on-one with County officials or County staff if your purpose is to lobby them. This rule does not extend to former County employees who are retained by not-for-profit organizations within the two year period. Moreover, the Two Year Rule does not apply to appearances before the County Commission or County board and committees when these bodies are exercising their quasi-judicial functions.

The rule does not restrict your employment with companies doing business with Miami-Dade County - it simply prohibits you from lobbying for these companies during this timeframe. Furthermore, the rule has no application in the municipalities, state government, school districts or the federal government. In other words, you may lobby any of these governments and their agencies upon leaving Miami-Dade County without violating the Two Year Rule.

The above is meant to convey the general principles associated with the Two Year Rule. If you have questions about a specific activity or whether certain conduct amounts to lobbying, please feel free to contact me at your convenience.

Sincerely,

Robert Meyers, Executive Director
Miami-Dade Commission on Ethics and Public Trust