

Frigo, Victoria (COE)

From: Frigo, Victoria (COE)
Sent: Thursday, November 01, 2012 1:13 PM
To: 'emehta@bilzin.com'
Cc: Centorino, Joseph (COE)
Subject: INQ 12-183 Ethics Course for Nonprofit Lobbyists

Ms. Mehta,

You are correct that a board member and an officer of a nonprofit organization who register as lobbyists in Miami-Dade County to represent the nonprofit on issues beyond the mere request for a grant must each take the County ethics training course for lobbyists and each pay the \$100 fee for the training course.

Under Sec. 2-11.1 (s)(4) of the County Code, individuals who represent nonprofits, without reimbursement for the appearance, on matters *other* than seeking grants, must register as lobbyists but are exempt from paying lobbyist registration fees. As registered lobbyists, however, these individuals are required to take the lobbyist ethics training course and to pay the fee for the course.

On the other hand, individuals representing nonprofits, without compensation, solely for the purpose of requesting grants, are *not* included in the definition of lobbyists and are *not* required to register as lobbyists. Consequently, they are *not* required to take the course on ethics training for lobbyists. (See Sec. 2-11.1 (s)(1)(b).)

The registration form and schedule of courses can be found at www.MiamiDadeEthics.com.

Please feel free to contact me if I can be of further assistance.

Sincerely,

VICTORIA FRIGO, STAFF ATTORNEY

Phone: 305 350-0601

Fax: 305 579-0273



19 West Flagler St., Suite 820
Miami, FL 33130

Miami-Dade County is a public entity subject to Chapter 119 of the Florida Statutes concerning public records. E-mail messages are covered under such laws and thus subject to disclosure.

From: Centorino, Joseph (COE)
Sent: Thursday, November 01, 2012 11:53 AM
To: Frigo, Victoria (COE)
Subject: FW: Ethics Course Question

Please respond to Ms. Mehta. Thanks.

From: Eileen Ball Mehta [<mailto:emehta@bilzin.com>]
Sent: Thursday, November 01, 2012 11:28 AM
To: Centorino, Joseph (COE)
Subject: Ethics Course Question

Joe:

Robert Meyers was at our office this morning to teach the annual ethics course. I had a question that he could not answer, and he suggested that I send an inquiry to you.

I represent a not-for-profit organization. A board member and an officer intend to file Miami-Dade County lobbyist registration forms in order to discuss issues that may go beyond the mere request for a grant. (Compare Sec. 2-11.1(s)(1)(b)).

It appears to me that the board member and the officer will need to take the ethics course. (See Sec. 2-11.1(s)(d)). The City of Miami, apparently, does not require that not-for-profit board members or officers take their ethics course. Am I correct in thinking that Miami-Dade County does not have such an exemption?

I want to make sure that my clients are in compliance, so I would appreciate your guidance. Thank you.



Eileen Ball Mehta
Bilzin Sumberg Baena Price & Axelrod LLP
1450 Brickell Avenue, 23rd Floor
Miami, Florida 33131
www.bilzin.com

Tel 305.350.2380
Direct Fax 305.351.2240
emehta@bilzin.com

TAX ADVICE DISCLOSURE

Pursuant to Internal Revenue Service Circular 230, we are required to advise you that if there is any tax advice contained herein, it is not intended to be used, and cannot be used, by the addressee or any taxpayer, for the purpose of avoiding penalties that may be imposed under the Internal Revenue Code.

This message contains information which may be confidential and privileged. Unless you are the addressee (or authorized to receive for the addressee), you may not use, copy or disclose to anyone the message or any information contained in this message. If you have received this message in error, please advise the sender by reply e-mail or reply to info@bilzin.com, and delete the message. Thank you very much.