

## Frigo, Victoria (COE)

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**From:** Frigo, Victoria (COE)  
**Sent:** Wednesday, February 08, 2012 2:38 PM  
**To:** 'Felix Lasarte'  
**Cc:** Centorino, Joseph (COE)  
**Subject:** Self-representation does not require registering as a lobbyist (INQ 12-30)

Mr. Lasarte,

You are correct in your interpretation of the County lobbying ordinance regarding citizens who wish to speak on their own behalf.

Sec. 2-11.1 (s)(3)(b) specifically states that a member of the public who expresses support of, or opposition to, an item is not required to register as a lobbyist *if all of the following are true:*

- He/she appears solely in his/her individual capacity.
- He/she appears for the purpose of self-representation only.
- He/she is not compensated or reimbursed, either directly, indirectly or on a contingency-fee basis, for his/her appearance.

Additionally, it would be prudent for these individuals to clarify before speaking that they are speaking on their own behalf and not on behalf of any organization with which they may have an association.

Sincerely,

**VICTORIA FRIGO, STAFF ATTORNEY**

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**From:** Felix Lasarte [<mailto:felix@lasartelaw.com>]  
**Sent:** Wednesday, February 08, 2012 11:44 AM  
**To:** Frigo, Victoria (COE)  
**Subject:** Ethics Opinion

Good afternoon Victoria,

I enjoyed speaking with you earlier this morning.

I just want to confirm our phone conversation from earlier today. If members from the public, which appear to support an item and are not being paid to support the item, do not have to register as a lobbyist, correct? Furthermore, if these members of the public work for a non-profit organization and they disclose on the record that they are there speaking on their own behalf, that they do not have to register as a lobbyist, correct?

Thank you for all your assistance.

Regards,

*Felix Lasarte, Esq.*  
*The Lasarte Law Firm*  
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