

## Frigo, Victoria (COE)

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**From:** Frigo, Victoria (COE)  
**Sent:** Monday, July 22, 2013 12:15 PM  
**To:** 'phillipscottcunningham@gmail.com'  
**Cc:** Centorino, Joseph (COE); Diaz-Greco, Gilma M. (COE); Steinback, Robert (COE)  
**Subject:** Question about lobbyist status (INQ 13-180)

Mr. Cunningham,

As a registered lobbyist, you are required to complete ethics training within 60 days of registering. Lobbyists who represent nonprofit 501(c)(3) organizations are *not* exempt from taking the training or paying the \$100 fee for the course. (See County Code at Sec. 2-11.1 (s)(2)(d).

The obligation to attend ethics training applies to *all* lobbyists, including those who represent nonprofit organizations. Unfortunately, the nature of your lobbying activities does not determine whether you must attend the training.

Sincerely,

**VICTORIA FRIGO, SENIOR STAFF ATTORNEY**

Direct Phone: 305 350-0601  
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**From:** Sanchez, Rodzandra (COE)  
**Sent:** Friday, July 19, 2013 9:56 AM  
**To:** 'P. Scott Cunningham'  
**Cc:** Frigo, Victoria (COE); Steinback, Robert (COE); Francis, Claude (COC)  
**Subject:** RE: Question about lobbyist status

Good Morning Victoria/Franicis,

Please read below Mr. Cunningham's question.... Ty

Rodzandra

**From:** P. Scott Cunningham [<mailto:phillipscottcunningham@gmail.com>]  
**Sent:** Thursday, July 18, 2013 5:29 PM  
**To:** Sanchez, Rodzandra (COE)  
**Subject:** Question about lobbyist status

Hello Rodzandra Sanchez,

I recently received a letter from the Miami-Dade County Commission on Ethics and Public Trust which states that the C.O.E. is currently reviewing all persons registered as lobbyists in Miami-Dade County to see if they have completed an ethics training course.

I registered as a lobbyist when I applied for my organization's 501c3 not-for-profit status, which I understood was recognized as different from applying as an actual lobbyist. I have never performed any function of a lobbyist in the State of Florida, nor do I plan to.

My organization organizing poetry readings in Miami, FL and has no political agenda.

Please advise me on the proper course of action.

Best,  
Phillip Scott Cunningham

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P. Scott Cunningham  
Director  
University of Wynwood  
[universityofwynwood.org](http://universityofwynwood.org)