
From: Diaz-Greco, Gilma M. (COE)
Sent: Tuesday, May 27, 2014 11:35 AM
To: Sanchez, Rodzandra (COE)
Subject: Ethics opinion (lobbying) INQ 14-127

INQ 14-127

From: Centorino, Joseph (COE)
Sent: Tuesday, May 27, 2014 11:19 AM
To: Diaz-Greco, Gilma M. (COE)
Subject: RE: follow-up question

This INQ should be limited to just principals who happen not to do lobbying regularly because it is not within their usual scope of employment. The principals need to register whenever they lobby regardless of whether it is within their scope of employment. You do not need to get into any further discussion of the “scope of employment” issue, which is not very clear and which will be one of the subjects addressed for clarification in the ordinance revisions.

From: Diaz-Greco, Gilma M. (COE)
Sent: Tuesday, May 27, 2014 11:09 AM
To: Centorino, Joseph (COE)
Subject: RE: follow-up question

Joe,

I note that (s)(1)(b)(3) states “Lobbyist specifically includes the principal as well as any employee whose normal scope of employment includes lobbying activities.” Do you know if the term “scope of employment” has been interpreted by the COE? A plain reading of this section would seem to indicate that principals need to register only when they themselves lobby. RQO 10-09 seems to address this issue. Here, it would not matter, because it appears that the principal will ultimately be involved in lobbying the BCC.

Given that this was a very short email exchange, perhaps it would be best to exclude it as an INQ? Without more explanation, it is possible it would create some confusion.

Thanks-
Mimi

From: Centorino, Joseph (COE)
Sent: Tuesday, May 27, 2014 10:57 AM
To: Diaz-Greco, Gilma M. (COE)
Subject: RE: follow-up question

I think it can be an INQ on the scope of employment issue.

From: Diaz-Greco, Gilma M. (COE)
Sent: Tuesday, May 27, 2014 10:47 AM
To: Centorino, Joseph (COE)
Subject: RE: follow-up question

Thanks-

Not an INQ – correct?

From: Centorino, Joseph (COE)
Sent: Tuesday, May 27, 2014 10:31 AM
To: Diaz-Greco, Gilma M. (COE)
Subject: FW: follow-up question

FYI

From: David J. Coviello [<mailto:DCoviello@shutts.com>]
Sent: Friday, May 23, 2014 12:22 PM
To: Centorino, Joseph (COE)
Subject: RE: follow-up question

Joe:

Received your message. Thanks. This matter will ultimately go to BCC, so we will just register.

Thanks.



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David J. Coviello

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From: David J. Coviello
Sent: Friday, May 23, 2014 11:02 AM
To: 'Centorino, Joseph (COE)'
Subject: RE: follow-up question

Ok, thanks.



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From: Centorino, Joseph (COE) [<mailto:CENTORI@miamidade.gov>]
Sent: Friday, May 23, 2014 11:01 AM

To: David J. Coviello
Subject: RE: follow-up question

Yes.

From: David J. Coviello [<mailto:DCoviello@shutts.com>]
Sent: Friday, May 23, 2014 11:00 AM
To: Centorino, Joseph (COE)
Subject: follow-up question

If the normal scope of employment of the principal of the company does not include lobbying, does he or she need to register?



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