Diaz-Greco, Gilma M. (COE)

From: Ramos, Miriam S. (COE)

Sent: Monday, January 27, 2014 12:16 PM

To: 'Jcastroglobal@aol.com'

Cedeno, Rachelle (COE); Diaz-Greco, Gilma M. (COE)

Subject: INQ 14-22

Dear Mr. Castro,

There is nothing in the Miami-Dade Conflict of Interest and Code of Ethics ordinance that prohibits a sales agent or marketing consultant from being a lobbyist. In fact, all pharmaceutical and device representatives that work at Jackson Memorial Hospital *must* register as lobbyist.

A lobbyist is defined as, "all persons, firms, or corporations employed or retained by a principal who seeks to encourage the passage, defeat, or modifications of (1) ordinance, resolution, action or decision of the County Commission; (2) any action, decision, recommendation of the County Manager or any County board or committee; or (3) any action, decision or recommendation of County personnel during the time period of the entire decision-making process on such action, decision or recommendation which foreseeably will be heard or reviewed by the County Commission, or a County board or committee. 'Lobbyist' specifically includes the principal, as well as any employee whose normal scope of employment includes lobbying activity." Sec. 2-11.1(s), Miami-Dade County Code.

If you have any further questions, please to do not hesitate to contact me.

Sincerely,

Míríam S. Ramos, Esq. Deputy General Counsel



Miami-Dade Commission on Ethics and Public Trust

19 W. Flagler Street, Suite 820

Miami, FL 33130 Tel: (305) 579-2594 Fax: (305) 579-0273 ethics.miamidade.gov

Under Florida law, email addresses are public records. If you do not want your e-mail address released to a public-records request, do not send electronic mail to this entity. Instead contact this agency by phone or in writing.

From: Jcastroglobal@aol.com [mailto:Jcastroglobal@aol.com]
Sent: Monday, January 27, 2014 9:59 AM

To: Ramos, Miriam S. (COE) **Subject:** Lobbiyst

Hello Miriam:

Pursuant to our conversation of today please let me know if a sales agent or marketing consultant can be a lobbyist.

Thank you so much Juan C. Castro