
From: Diaz-Greco, Gilma M. (COE)
Sent: Wednesday, October 15, 2014 8:28 AM
To: Sanchez, Rodzandra (COE)
Subject: M. Kristina Raattama, General Counsel, Florida International University (FIU)-(Lobbying) INQ 14-243

Attachments: FIU-Joseph Centorino re YF 9-29-2014.pdf

INQ 14-243

From: Centorino, Joseph (COE)
Sent: Tuesday, October 14, 2014 3:22 PM
To: 'devillee@fiu.edu'
Cc: Diaz-Greco, Gilma M. (COE)
Subject: INQ - M. Kristina Raattama, General Counsel, Florida International University (FIU)

Ms. Raattama:

In your letter of September 29, 2014, you inquired regarding whether the following positions at FIU are exempt from the Miami-Dade County Code provisions concerning lobbyist registration and ethics training:

- President
- President's Chief of Staff
- Senior Vice President, External Relations
- Vice President, Governmental Relations
- Assistant Vice President, Political and Governmental Affairs
- Director, Governmental Relations

Please be advised that Section 2-11.1(s)(3)(a) of the County Code of Ethics provides that, "Any public officer, employee or appointee who only appears in his or her official capacity shall not be required to register as a lobbyist." FIU being a state public university, any of its officers, employees or appointees appearing only in their official capacities would be exempt from registering as lobbyists under the Code. Assuming that all of the aforementioned individuals would be classified in one or more of the aforementioned public service categories, all of them would be exempt from the Code and the would not need to register as lobbyists with the County, provided that their governmental activities were limited to their official roles at FIU.

Further, since the Code requirement concerning lobbyist ethics training in Section 2-11.1(s)(2)(d) applies only in connection with those to whom lobbyist registration is required, such individuals would also be exempt from completing lobbyist ethics training.

Please contact me at 305-579-2594 should you have any further questions.

Sincerely,

Joseph M. Centorino
Executive Director and General Counsel
Miami-Dade Commission on Ethics and Public Trust

From: Elianet Deville [mailto:devillee@fiu.edu]
Sent: Tuesday, September 30, 2014 12:13 PM
To: Centorino, Joseph (COE)
Subject: FIU

Mr. Centorino-

Please see attached letter form Kristina Raattama, General Counsel at Florida International University.

Thank you.

Eli Deville
Special Assistant to General Counsel
Office of the General Counsel
11200 S.W. 8th Street, PC 511
Miami, Florida 33199
305.348.2103 | Direct: 305.348.4876



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Via Email centori@miamidade.gov

September 29, 2014

Joseph M. Centorino, Executive Director
Miami-Dade Commission on Ethics and Public Trust
19 West Flagler, Suite 820
Miami, Florida 33130

Dear Mr. Centorino:

The purpose of the letter is to request confirmation that Florida International University (FIU) employees who in the course and scope of their employment are assigned responsibilities to lobby (as defined in the Code)¹ the County, and Trustees who may have occasion to lobby (as defined in the Code) on behalf of FIU, are exempt under the Code and therefore need not register nor fulfill any of the requirements of the code applicable to lobbyists, including, but not limited to, ethics training.

Please confirm that the following positions are exempt:

- President
- President's Chief of Staff
- Senior Vice President, External Relations
- Vice President, Governmental Relations
- Assistant Vice President, Political and Governmental Affairs
- Director, Governmental Relations

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

Sincerely,

A handwritten signature in cursive script, appearing to read "M. Kristina Raattama".

M. Kristina Raattama
General Counsel

¹ (3) (a) Any public officer, employee or appointee who only appears in his or her official capacity shall not be required to register as a lobbyist. *The Conflict of Interest and Code of Ethics Ordinance, as amended through December 2010.* http://ethics.miamidade.gov/library/Publications/code_of_ethics2010.pdf

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