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**From:** Diaz-Greco, Gilma M. (COE)  
**Sent:** Tuesday, June 30, 2015 10:33 AM  
**To:** Sanchez, Rodzandra (COE)  
**Subject:** FW: Keith Kulynych, Architect, Revuelta Architecture International P.A. (Lobbying) INQ 15-133

INQ 15-133 Kulynych

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**From:** Perez, Martha D. (COE)  
**Sent:** Tuesday, June 30, 2015 10:23 AM  
**To:** [kkulynych@revuelta.com](mailto:kkulynych@revuelta.com)  
**Cc:** [mshaber@miamigov.com](mailto:mshaber@miamigov.com); Centorino, Joseph (COE); Diaz-Greco, Gilma M. (COE)  
**Subject:** Keith Kulynych, Architect, Revuelta Architecture International P.A. (Lobbying) INQ 15-133

Mr. Kulynych,

You inquired whether an architect representing a condominium association is required to register as a lobbyist and take the ethics training course when appearing before the Miami City Commission, acting in its quasi-judicial capacity, concerning an appeal from a decision of the Planning, Zoning and Appeals Board (PZAB) regarding a development project.

Section 2-11.1(s)(1)(b) of the Miami-Dade County Code of Ethics specifically excludes the following individuals from lobbying registration and training requirements: attorneys or **other representatives** retained or employed solely for the purpose of representing individuals, corporations or other entities during publicly noticed quasi-judicial proceedings where the law prohibits ex-parte communications. However, the City of Miami Lobbyist Ordinance does not include that exception. Under Sec. 2-653 of the City of Miami Lobbyist Ordinance, a lobbyist includes all persons, firms, corporations employed or retained by a principal who seeks to encourage the passage, defeat or modification, in this instance, of a decision of the city board, except an attorney representing a client in enforcement proceedings before the Code Enforcement Board, Nuisance Abatement Board or Civil Service Board.

Municipalities may set stricter standards than those included in the County's Code of Ethics. Consequently, pursuant to Section 2-653 of the City of Miami Code, representatives, including architects, who appear on behalf of individuals, corporations or entities before the City's quasi-judicial boards are required to register as lobbyists and complete the ethics training course, **unless** the sole purpose of their appearance is to provide factual information requested by the board members.

If you have any questions concerning the above, do not hesitate to contact me at (305) 579-2594.

Sincerely,

**Martha D. Perez**  
Staff Attorney  
MIAMI-DADE COUNTY COMMISSION ON ETHICS & PUBLIC TRUST  
19 West Flagler St. Suite 820  
Miami, FL 33130  
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**From:** Diaz-Greco, Gilma M. (COE)  
**Sent:** Tuesday, June 30, 2015 9:41 AM  
**To:** Perez, Martha D. (COE)  
**Subject:** FW: Lobbyist Registration - City of Miami

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**From:** Keith Kulynych [<mailto:kkulynych@revuelta.com>]  
**Sent:** Wednesday, June 24, 2015 1:14 PM  
**To:** Diaz-Greco, Gilma M. (COE)  
**Cc:** Barbara Pederzoli; Lian Revuelta; Luis O. Revuelta; Iris V. Escarra ([EscarraI@gtlaw.com](mailto:EscarraI@gtlaw.com)); Timothy Wensing ([twensing@cmcrealestate.com](mailto:twensing@cmcrealestate.com))  
**Subject:** Lobbyist Registration - City of Miami

Ms. Gilma Diaz-Greco:

Thank you for your time this morning. As discussed, I advised that the City of Miami Commission is having a hearing next week to rule on an appeal that was filed by a condo association in regards to a Planning and Zoning approval of a development project. In general you advised that Miami Dade County code requires lobbyist registration and the ethics training. The City of Miami Code section 2-654 requires that a certification of training be provided prior to lobbyist registration. However, the next class is July 1 and completes around 1pm. The City of Miami Commission meeting is also July 1 and runs all day.

You advised that there is an exception in the Miami Dade County Code section 2-11.1(s)(1)(b) that applies for quasijudicial boards that applies to architects, attorneys, etc that does not require ethics training. Our counsel will need to confirm that this exception is applicable to to the City of Miami commission hearing.

Please confirm receipt and accuracy of the above.

Keith R. Kulynych

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