
From: Diaz-Greco, Gilma M. (COE)
Sent: Tuesday, July 28, 2015 9:33 AM
To: Sanchez, Rodzandra (COE)
Subject: FW: Tyler Kleinman, Nielsen Merksamer (Lobbying) INQ 15-162
Attachments: Lobbying FAQs 2014.docx

[INQ 15-162 Kleinman](#)

From: Perez, Martha D. (COE)
Sent: Tuesday, July 28, 2015 9:26 AM
To: tkleinman@nmgoblaw.com
Cc: Centorino, Joseph (COE); Diaz-Greco, Gilma M. (COE)
Subject: Tyler Kleinman, Nielsen Merksamer (Lobbying) INQ 15-162

Good afternoon Mr. Kleinman,

It was a pleasure speaking with you. You inquired whether a lobbyist in your company was required to take the lobbyist training course within 60 days of his re-registration as a lobbyist. You indicated that the lobbyist at your firm initially registered as a County lobbyist in December 2013. At that time, he also completed the initial Ethics Course. You have advised that his lobbyist registration lapsed and he is in the process of re-registering in 2015 and you wish to know whether he is required to take the ethics training course again.

Section 2-11.1(s)(2)(d) of the Miami-Dade County Ethics Code provides that a lobbyist must provide a certificate of completion of the Ethics Course within 60 days after registering as a lobbyist. If completed previously and upon continuous registration, then the lobbyist must complete a refresher course every two years. The language of the ordinance was clearly intended to apply to individuals whose lobbyist registration lapsed for a period longer than the two years for which the training is intended to apply. Consequently, the lobbyist at your firm may re-register as a lobbyist but must complete the lobbyist refresher Ethics Course on or before December, 2015.

I am also attaching the "Lobbyist FAQ's" for your information.

This opinion is based on the facts presented. If these facts change, kindly contact us.

Sincerely,

Martha D. Perez
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