
From: Diaz-Greco, Gilma M. (COE)
Sent: Thursday, March 26, 2015 1:21 PM
To: Sanchez, Rodzandra (COE)
Subject: FW: INQ - Evelyn Campo, MDC Aviation (lobbying) INQ 15-48
Attachments: COE - RMeyers 1-18-05 Letter to Lobbyist with Lobbying Rules of Procedure.pdf; Lobbying RQO Summaries.docx; Summary of Lobbying INQs through 2013.docx

INQ 15-48 Campos

From: Centorino, Joseph (COE)
Sent: Thursday, March 26, 2015 1:15 PM
To: Diaz-Greco, Gilma M. (COE)
Subject: FW: INQ - Evelyn Campos (MDC Aviation) - Lobbying

This is the response I meant to send, but apparently sent you the request instead.

From: Centorino, Joseph (COE)
Sent: Thursday, March 26, 2015 11:24 AM
To: Campos, Evelyn (Aviation)
Subject: INQ - Evelyn Campos (MDC Aviation) - Lobbying

Ms. Campos,

In response to your request for guidance on what constitutes lobbying, we do have Rules of Procedure as well as a prior opinions addressing specific situations. I have attached the Rules of Procedure adopted in 2005, which should be helpful. Please note that the requirement 9.9 that an annual expenditure report must be filed by a lobbyist even if the lobbyist made no expenditure during the prior year is no longer applicable since the County Commission has abolished that requirement. Also, the policies do not include the lobbyist training requirements now included in Section 11.1(s)(2)(d) of the Code. We hope to be issuing an updated set of guidelines in the near future. I have also attached copies of summaries of some past opinions provided by the COE and COE staff concerning lobbying, which should also be helpful.

In the event that you have a question regarding a specific scenario involving lobbying, we will be happy to respond to it.

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

From: Campos, Evelyn (Aviation) [<mailto:ECampos@miami-airport.com>]
Sent: Wednesday, March 25, 2015 10:53 AM
To: Centorino, Joseph (COE)
Cc: Napoli, Joe (Aviation)
Subject: FW: Opinion on Lobbying Activities

Mr. Centorino,

Please advise if your office has received the below request for an opinion, thank you!

Evelyn Campos
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From: Campos, Evelyn (Aviation)
Sent: Monday, March 02, 2015 3:55 PM
To: Centorino, Joseph (COE)
Cc: Napoli, Joe (Aviation); Campos, Evelyn (Aviation); Del Calvo, Sara (Aviation); Eisenberg, Mindy (Aviation)
Subject: Opinion on Lobbying Activities

Mr. Centorino,

The Aviation Department is seeking to monitor lobbying activities that may occur within the Department. The vehicle in which the Department memorializes policy and correlating procedures is to issue a directive, in this case, a Departmental Standard Operating Procedure (DSOP). The attached DSOP was prepared in furtherance of lobbying monitoring and submitted to our County Attorney for review. The Co Attny's recommendation was to submit this directive to the COE for guidance on a definition on what is lobbying or what activities would be construed as lobbying to better clarify for our staff when lobbying activity is occurring.

We respectfully request a Commission on Ethics opinion as indicated, thank you.