

Sanchez, Rodzandra (COE)

From: Diaz-Greco, Gilma M. (COE)
Sent: Thursday, August 18, 2016 1:23 PM
To: Sanchez, Rodzandra (COE)
Subject: Jennifer Blohm, Meyer, Brooks, Dehmer and Blohm, P.A. (Lobbying) INQ 16-203

INQ 16-203 Blohm

From: Centorino, Joseph (COE)
Sent: Monday, August 15, 2016 3:44 PM
To: 'Jennifer S. Blohm' <JBlohm@meyerbrookslaw.com>
Cc: Ronald Meyer <rmeyer@meyerbrookslaw.com>; Turay, Radia (COE) <Radia.Turay@miamidade.gov>; Perez, Martha D. (COE) <perezmd@miamidade.gov>; Diaz-Greco, Gilma M. (COE) <GDIAZGR@miamidade.gov>
Subject: INQ 16-203 Jennifer Blohm, Meyer, Brooks, Dehmer and Blohm, P.A. (Lobbying)

Ms. Blohm:

In regard to your inquiry concerning whether an organization that you represent may send emails to the general public encouraging individuals receiving them to contact their county commissioners urging them to take a position for or against an issue before the Commission without having to register as a lobbyist, please be advised that it is my opinion that such activity does not require lobbyist registration under Section 2-11.1(s) of the Miami-Dade County Conflict of Interest and Code of Ethics Ordinance. It is my understanding that these solicitations will be sent out by the organization itself wishing to generate public support regarding a County issue and not by your firm or surrogate for the organization that has an interest in the legislative issue. The activity would not be considered lobbying under our Ethics Code.

Sincerely,

Joe Centorino

Joseph M. Centorino

Executive Director and General Counsel
Miami-Dade Commission on Ethics and Public Trust
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ethics.miamidade.gov



From: Jennifer S. Blohm [<mailto:JBlohm@meyerbrookslaw.com>]
Sent: Friday, August 12, 2016 10:20 AM
To: Centorino, Joseph (COE) <CENTORI@miamidade.gov>
Cc: Ronald Meyer <rmeyer@meyerbrookslaw.com>
Subject: Question on Lobbyist Registration

Dear Joe,

Thank you for speaking with Ron and me this morning. I have an organization that would like to send emails to the general public encouraging individuals to contact their county commissioner and urge him or her to support or oppose an issue that is before the Commission. The organization will not be contacting commissioners directly. Their activities will be limited to communications with the general public. Does the organization have to register as a lobbyist? If so, does it have to disclose its donors? We appreciate any guidance you can provide.

Sincerely,
Jennifer

Jennifer S. Blohm
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