

## Sanchez, Rodzandra (COE)

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**From:** Diaz-Greco, Gilma M. (COE)  
**Sent:** Tuesday, April 18, 2017 3:59 PM  
**To:** Sanchez, Rodzandra (COE)  
**Subject:** Kate Belinski, Attorney, Nossaman LLP (Lobbyist Training) INQ 17- 116

INQ 17-116 Belinski

-----Original Message-----

From: Diaz-Greco, Gilma M. (COE)  
Sent: Tuesday, April 18, 2017 3:42 PM  
To: 'Belinski, Kate A.' <kbelinski@nossaman.com>  
Cc: Centorino, Joseph (COE) <Joseph.Centorino@miamidade.gov>; Murawski, Michael P. (COE) <Michael.Murawski@miamidade.gov>; Perez, Martha D. (COE) <perezmd@miamidade.gov>; Turay, Radia (COE) <Radia.Turay@miamidade.gov>  
Subject: Kate Belinski, Attorney, Nossaman LLP (Lobbyist Training) INQ 17- 116

Dear Ms. Belinski:

You have inquired on behalf of your client, about the consequences of failing to complete lobbyist training within the 60 day period required by County Ethics Code Section 2-11.1(s)(2)(d) The County Ethics Code which regulates lobbying in Miami Dade County requires registration and completion of a lobbyist training within a 60 day period after registration, prior to lobbying.

If a person who has registered as a lobbyist cannot complete the ethics training within the 60 day period required by the County Ethics code, he or she will be prohibited from lobbying until the training can be completed. We advise that parties check the ethics training dates listed on our website at [ethics.miamidade.gov](http://ethics.miamidade.gov) prior to registration in order to ensure that the training can be completed within 60 days.

Please contact me if you have further questions.

Cordially,

Gilma (Mimi) Diaz-Greco  
Staff Attorney  
Miami-Dade Commission on Ethics and Public Trust  
19 W. Flagler Street, Suite 820  
Miami, FL 33130  
Tel: (305) 579-2594  
Fax: (305) 579-0273  
[gdiazgr@miamidade.gov](mailto:gdiazgr@miamidade.gov)  
[www.facebook.com/MiamiDadeEthics](http://www.facebook.com/MiamiDadeEthics)

-----Original Message-----

From: Belinski, Kate A. [<mailto:kbelinski@nossaman.com>]

Sent: Tuesday, April 18, 2017 1:27 PM

To: Diaz-Greco, Gilma M. (COE) <Gilma.Diaz-Greco@miamidade.gov>

Subject: Re: Kate Belinski, Attorney, Nossaman LLP (Lobbyist Training) INQ 17-98

Yes, she registered last month out of an abundance of caution, although she has not made any lobbying contacts yet. But she wanted to make sure she was registered in case she did need to make a contact.

Sent from my iPhone

On Apr 18, 2017, at 1:03 PM, Diaz-Greco, Gilma M. (COE) <Gilma.Diaz-Greco@miamidade.gov<mailto:Gilma.Diaz-Greco@miamidade.gov>> wrote:

Ms. Belinski:

Has the lobbyist you re referring to already registered as a lobbyist with the Miami-Dade Clerk of the Board?

Gilma (Mimi) Diaz-Greco  
Staff Attorney

<image001.png>

Miami-Dade Commission on Ethics and Public Trust

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gdiazgr@miamidade.gov<<http://www.miamidadeethics.com/>>

[www.facebook.com/MiamiDadeEthics](http://www.facebook.com/MiamiDadeEthics)<<http://www.facebook.com/MiamiDadeEthics>>

From: Belinski, Kate A. [mailto:kbelinski@nossaman.com]

Sent: Monday, April 17, 2017 4:50 PM

To: Diaz-Greco, Gilma M. (COE) <Gilma.Diaz-Greco@miamidade.gov<mailto:Gilma.Diaz-Greco@miamidade.gov>>

Subject: RE: Kate Belinski, Attorney, Nossaman LLP (Lobbyist Training) INQ 17-98

Ms. Diaz-Greco,

Thank you for your email and phone guidance. Following up on the information provided below, one of our lobbyists is unable to attend the April and May training dates as they had trips scheduled to other states during those sessions. The lobbyist is planning to attend the June training, but that will be beyond the 60-day window. What are the consequences for not submitting the certificate of completion until after the 60-day window? This lobbyist is only in Miami-Dade/Jackson Health once or twice per year, but will make a special trip to attend the June training.

Thank you,  
Kate

Kate A. Belinski

Attorney at Law

NOSSAMAN LLP

1666 K Street, NW, Suite 500

Washington, DC 20006

kbelinski@nossaman.com<mailto:kbelinski@nossaman.com>

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From: Diaz-Greco, Gilma M. (COE) [mailto:Gilma.Diaz-Greco@miamidade.gov]  
Sent: Thursday, March 30, 2017 9:50 AM  
To: Belinski, Kate A.  
Subject: FW: Kate Belinski, Attorney, Nossaman LLP (Lobbyist Training) INQ 17-98

Ms. Belinski:

This email was returned. I verified your email and am re-sending. Please confirm receipt.

Thank you,

Gilma (Mimi) Diaz-Greco  
Staff Attorney

<image001.png>

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Dear Ms. Belinski:

You inquired whether lobbyist training is mandatory or voluntary under the Miami-Dade County Code of Ethics. You advise that you represent salespersons who sell goods and services to Jackson Health System/Public Health Trust (PHT) who do not reside in Florida and have to fly to Miami to attend lobbyist training.

In previous formal opinions, the County Ethics Commission held that PHT vendors would be considered lobbyists, as defined in the County Ethics Code, and are required to register as lobbyists if they approach PHT staff seeking to influence the purchase of products or services which foreseeably will be reviewed by the PHT Board of Trustees or a PHT board or committee. See RQO 06-63, RQO 06-65, RQO 10-28.

Pursuant to County Ethics Code Section 2-11.1(s)(2)(d) lobbyists are mandated to complete an initial lobbyist training course upon initial lobbyist registration and a refresher course every two years thereafter. This Section states in relevant part:

"(d) Each lobbyist shall, within sixty (60) days after registering as a lobbyist, submit to the Clerk of the Board a certificate of completion of an ethics course offered by the Miami-Dade County Commission on Ethics and Public Trust ("Ethics Course"). Lobbyists who have completed the initial Ethics Course mandated by the preceding sentence and have continuously registered as a lobbyist thereafter shall be required to complete a refresher Ethics Course every two years. Each lobbyist who has completed a refresher Ethics Course shall submit to the Clerk of the Board a certificate of completion within sixty (60) days after registering as a lobbyist."

Thus, lobbyist training is required under the County Ethics code and is not voluntary. Please contact me if you have any further questions via email or by phone at (305) 350-0638.

Regards,

Gilma (Mimi) Diaz-Greco  
Staff Attorney

<image001.png>

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