

## Sanchez, Rodzandra (COE)

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**From:** Diaz-Greco, Gilma M. (COE)  
**Sent:** Friday, November 17, 2017 10:13 AM  
**To:** Sanchez, Rodzandra (COE)  
**Subject:** Abbie Schwaderer-Raurell, Assistant County Attorney, Miami-Dade County, re: lobbyist registration requirements INQ 17-265 (Amended)  
**Attachments:** RQO 12-09 Carreno.pdf

[INQ 17-265 Schwaderer Raurell \(Amended\)](#)

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**From:** Centorino, Joseph (COE)  
**Sent:** Friday, November 17, 2017 10:06 AM  
**To:** Schwaderer-Raurell, Abbie (CAO) <[Abbie.Schwaderer-Raurell@miamidade.gov](mailto:Abbie.Schwaderer-Raurell@miamidade.gov)>  
**Cc:** Sanchez, Gerald (CAO) <[Gerald.Sanchez@miamidade.gov](mailto:Gerald.Sanchez@miamidade.gov)>; Kirtley, Eddie (CAO) <[Eddie.Kirtley@miamidade.gov](mailto:Eddie.Kirtley@miamidade.gov)>; Turay, Radia (COE) <[Radia.Turay@miamidade.gov](mailto:Radia.Turay@miamidade.gov)>; Perez, Martha D. (COE) <[Martha.Perez2@miamidade.gov](mailto:Martha.Perez2@miamidade.gov)>; Diaz-Greco, Gilma M. (COE) <[Gilma.Diaz-Greco@miamidade.gov](mailto:Gilma.Diaz-Greco@miamidade.gov)>  
**Subject:** Amended INQ 17-265 Abbie Schwaderer-Raurell, Assistant County Attorney, Miami-Dade County, re: lobbyist registration requirements

Please see [Amended INQ 17-265](#) below, indicating that there is NO need for County staff to register as lobbyists. I thank Eddie Kirtley for pointing out the oversight.

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**From:** Centorino, Joseph (COE)  
**Sent:** Friday, November 17, 2017 9:44 AM  
**To:** Schwaderer-Raurell, Abbie (CAO) <[Abbie.Schwaderer-Raurell@miamidade.gov](mailto:Abbie.Schwaderer-Raurell@miamidade.gov)>  
**Cc:** Troner, Susannah (RER) <[Susannah.Troner@miamidade.gov](mailto:Susannah.Troner@miamidade.gov)>; Sanchez, Gerald (CAO) <[Gerald.Sanchez@miamidade.gov](mailto:Gerald.Sanchez@miamidade.gov)>; Kirtley, Eddie (CAO) <[Eddie.Kirtley@miamidade.gov](mailto:Eddie.Kirtley@miamidade.gov)>; Turay, Radia (COE) <[Radia.Turay@miamidade.gov](mailto:Radia.Turay@miamidade.gov)>; Perez, Martha D. (COE) <[Martha.Perez2@miamidade.gov](mailto:Martha.Perez2@miamidade.gov)>; Diaz-Greco, Gilma M. (COE) <[Gilma.Diaz-Greco@miamidade.gov](mailto:Gilma.Diaz-Greco@miamidade.gov)>  
**Subject:** INQ 17-265 Abbie Schwaderer-Raurell, Assistant County Attorney, Miami-Dade County, re: lobbyist registration requirements

Abbie,

In response to your inquiry below, there would be NO need for County Staff members in the Miami-Dade County Office of Resilience to register as lobbyists under the County Ethics Code under the circumstances related in your email below. I understand that the staff members would be working on a grant agreement with an outside entity approved by the Board of County Commissioners, and which will be administered in the County's Office of Resilience. The work will include drafting for the Count related to energy usage and reporting, as well as meeting with interested individuals in and outside of the County, as well as conducting workshops on the topic. They will also be discussing proposed County legislation with the County Commission members, which, as I understand, is the reason for this inquiry.

Section 2-11.1(s)(3)(a) of the County Ethics Code provides that, "Any public officer, employee or appointee who only appears in his or her official capacity shall not be required to register as a lobbyist." Inasmuch as these staff members are County employees and will be fulfilling their job duties as employees of the County Office of Resilience, they would be covered by this exception, even though they are working with an outside entity, because that entity is engaged in a partnership with the County fulfilling an identified public project. Moreover, County employees would not, under any circumstances I can imagine, be required to register as lobbyists in the County, since they would not be permitted to be lobbyists for third parties before the County under RQO 12-09 (attached). In this situation, however, we don't consider

what they are doing to be lobbying, since they are fulfilling their County job responsibilities and serving a legitimate County purpose.

Joe

*Joseph M. Centorino*

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**From:** Schwaderer-Raurell, Abbie (CAO)  
**Sent:** Thursday, November 16, 2017 4:33 PM  
**To:** Centorino, Joseph (COE) <[Joseph.Centorino@miamidade.gov](mailto:Joseph.Centorino@miamidade.gov)>  
**Cc:** Troner, Susannah (RER) <[Susannah.Troner@miamidade.gov](mailto:Susannah.Troner@miamidade.gov)>  
**Subject:** Question re: lobbyist registration requirements

Good afternoon Joe,

Thanks again for taking the time to speak with us earlier this week. At your convenience, would you mind sending us back an email with your conclusion about the issue described below?

The Board of County Commissioners approved a grant agreement that is being administered by the County's Office of Resilience. The work for that grant agreement will be done by County staff members who are in the Office of Resilience, that that work will include drafting proposed County legislation related to energy usage and reporting; meeting with interested people both inside the County and outside; conducting workshops on the topic and the proposed legislation to provide information and get feedback from interested parties; and discussing proposed County legislation with County Commissioners.

Our question to you was whether these County staff members would be required to register as lobbyists under the County Code of Ethics.

Thank you,

*Abbie Schwaderer Raurell*  
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Miami-Dade County Attorney's Office  
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