

Sanchez, Rodzandra (COE)

From: Diaz-Greco, Gilma M. (COE)
Sent: Tuesday, February 21, 2017 3:21 PM
To: Sanchez, Rodzandra (COE)
Subject: FW: Brandon Cornejo, Design Staff, Raymond Jungles, Inc., RE: Ethics Training and Lobbyist Registration; INQ 17-47
Attachments: Lobbying FAQs 2015.pdf

INQ 17-47 Cornejo

From: Perez, Martha D. (COE)
Sent: Tuesday, February 21, 2017 2:56 PM
To: 'Brandon@raymondjungles.com' <Brandon@raymondjungles.com>
Cc: Centorino, Joseph (COE) <Joseph.Centorino@miamidade.gov>; Diaz-Greco, Gilma M. (COE) <Gilma.Diaz-Greco@miamidade.gov>; Turay, Radia (COE) <Radia.Turay@miamidade.gov>
Subject: Brandon Cornejo, Design Staff, Raymond Jungles, Inc., RE: Ethics Training and Lobbyist Registration; INQ 17-47

Dear Mr. Cornejo,

You inquire whether you are required to pay the lobbyist registration fee and complete the ethics training as an employee of Raymond Jungles, Inc. when representing the private, for-profit company and speaking on its behalf before the County Commission.

Pursuant to our conversation, you have advised that you have indeed registered, paid the fee and you will be participating in the ethics training. As I explained to you, the lobbyist registration requirements apply to a principal and any person employed or retained by a principal (in this instance, Raymond Jungles, Inc. is the principal) who seeks to encourage the passing, defeat or modification of an ordinance, resolution, action or decision of the County Commission, County Mayor, County board or committee. All lobbyists must register with the Clerk of the Board, pay the registration fee, pay and complete the ethics course. See Section 2-11.1(s), County Ethics Code.

There is an exemption of the lobbyist registration **fee** for *principals* of a corporation, however, principals are still required to register and take the ethics course if they are going to lobby. The following individuals are considered *principals*: the president, owner or chief shareholder of the corporation who engages in lobbying; an individual who has been designated by the corporation or who has the apparent authority to make final decisions on behalf of the corporation who engages in lobbying; or, a member of the corporate board who has been appointed as the representative during lobbying activities. In these instances, the *principal* is required to complete the lobbyist registration and take the ethics course, but he or she is exempt from the registration fee. See Section 2-11.1(s)(3)(b); RQO 10-09; INQ 15-190. Consequently, if you have been designated by your employer as the *principal* of the corporation, you should seek reimbursement of the lobbyist registration fee. Otherwise, if you will engage in lobbying on behalf of the corporation, the most prudent course of action is to register, pay the fee and sign up and pay for the ethics course, as you did.

I am attaching "Lobbying Frequently Asked Questions (FAQ's) 2015" for your information.

This opinion is based on the facts as presented. If any of these facts change, please contact us.

Sincerely,

Martha D. Perez

Staff Attorney
MIAMI-DADE COUNTY COMMISSION ON ETHICS & PUBLIC TRUST
19 West Flagler St. Suite 820
Miami, FL 33130
(305)350-0656
PEREZMD@miamidade.gov

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From: Ethics (COE)
Sent: Tuesday, February 21, 2017 9:56 AM
To: 'Brandon@raymondjungles.com' <Brandon@raymondjungles.com>
Cc: Perez, Martha D. (COE) <perezmd@miamidade.gov>
Subject: FW: Ethics Training and Lobbyist Registration

Mr. Cornejo,
I apologize for not getting back to you sooner. I was out of town all of last week. This matter has been referred to Staff Attorney Martha Perez, who will be able to assist you.
Joe Centorino

From: Brandon Cornejo [<mailto:Brandon@raymondjungles.com>]
Sent: Monday, February 13, 2017 10:52 AM
To: Ethics (COE) <ethics@miamidade.gov>; Lobbyist Registration (ITD) <lobbyist@miamidade.gov>
Subject: Ethics Training and Lobbyist Registration

To whom it may concern,

I just submitted payment for lobbyist registration.
I am an employee, not hired as a lobbyist, but have spoken at a County Commission, on behalf of the company I am employed by.
Do I need to complete ethics training as well? I have received multiple opinions for various sources.
The City of Miami tells me I just need to register as a lobbyist but do not need to complete ethics training or pay for registration because I am an employee.
So am wondering if it is the same case for the county.

Thanks,

BRANDON CORNEJO
DESIGN STAFF

Raymond Jungles, Inc.
www.raymondjungles.com
3000 Grand Avenue
Coconut Grove, Miami, FL 33133
T: 305.858.6777 (x202) | F: 786.703.4382