

## Sanchez, Rodzandra (COE)

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**From:** Diaz-Greco, Gilma M. (COE)  
**Sent:** Wednesday, March 29, 2017 3:42 PM  
**To:** Sanchez, Rodzandra (COE)  
**Subject:** FW: Kate Belinsky, Attorney, Nossaman LLP (Lobbyist Training) INQ 17-98

INQ 17-98 Belinsky

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**From:** Diaz-Greco, Gilma M. (COE)  
**Sent:** Wednesday, March 29, 2017 3:41 PM  
**To:** 'kbelinsky@nossaman.com' <kbelinsky@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 Belinsky, Attorney, Nossaman LLP (Lobbyist Training) INQ 17-98

Dear Ms. Belinsky:

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



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