

M E M O

COMMISSION ON ETHICS & PUBLIC TRUST

TO: File

FROM: Miriam S. Ramos, Deputy General Counsel

DATE: June 6, 2014

RE: 2011 Miami Beach Lobbyist Appeals – K12-038

The City of Miami Beach Code provides that lobbyists must file expenditure statements by April 30th of the year following the year in which they were registered to lobby in Miami Beach (Sec. 2-485).

During 2012, the Miami Beach Clerk's Office sent two (2) lists to the Commission on Ethics.

The first list included those lobbyists who had complied by filing the required form but who filed late and therefore had been assessed fines. From that list, 22 lobbyists appealed the fine amount. Of the 22, 16 (72%) had their fines waived and 6 (3.6%) were granted fine reductions (see attached memos). All those who were granted reductions, paid the reduced amount.

The second list included 42 lobbyists who did not file their 2011 expenditure statement at all. The COE obtained compliance from 25 (59%) of those individuals. All individuals were contacted numerous times by the COE, via U.S. Mail (including certified/return receipt) and/or e-mail. Searches were also run in order to ascertain accurate contact information.

Pursuant to Sec. 2-485(d), Miami Beach Code, "any lobbyist who fails to file the required expenditure report by April 30 shall be automatically suspended from lobbying until all fines are paid, unless the fine has been appealed to the Miami Dade County Ethics Commission." Therefore, those 17 individuals who have not filed will be unable to re-register as lobbyist in Miami Beach until such time as they come into compliance.

Based on the foregoing, the instant case is closed without further action.