

## Sanchez, Rodzandra (COE)

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**From:** Diaz-Greco, Gilma M. (COE)  
**Sent:** Monday, May 21, 2018 1:32 PM  
**To:** Sanchez, Rodzandra (COE)  
**Subject:** Namita Uppal, Chief Procurement Officer, ISD, Lobbying (s), INQ 18-121

INQ 18-121 Uppal

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**From:** Perez, Martha D. (COE)  
**Sent:** Monday, May 21, 2018 1:26 PM  
**To:** Uppal, Namita (ISD) <Namita.Uppal@miamidade.gov>  
**Cc:** Centorino, Joseph (COE) <Joseph.Centorino@miamidade.gov>; Murawski, Michael P. (COE) <Michael.Murawski@miamidade.gov>; Diaz-Greco, Gilma M. (COE) <Gilma.Diaz-Greco@miamidade.gov>; Turay, Radia (COE) <Radia.Turay@miamidade.gov>  
**Subject:** Namita Uppal, Chief Procurement Officer, ISD, Lobbying (s), INQ 18-121

Dear Ms. Uppal,

You inquire whether Colonial Life Insurance representatives must register to lobby before they attend a meeting, *at their request*, to discuss information they previously shared with Commissioner Monestime and provide additional insight on how they can help Miami-Dade County cut employee benefit costs.

### Background

Colonial Life Insurance (Colonial) is a company which offers supplemental health benefits for life insurance, accident insurance, disability insurance, etc. Colonial representatives recently met with Commissioner Monestime to share information “regarding ways of bringing about cost savings to the county in the area of employee benefits.” Mr. Paulcin, Colonial’s Development Manager, has requested another meeting with you to further discuss the company’s products and services. When requested to complete the lobbyist registration, Mr. Paulcin indicated that they are not lobbyists therefore, they do not need to register. He further requested to register as a County vendor and confirmed they did not wish to register as lobbyists.

The County’s Human Resources Department continues to review and seek RFPs on expiring contracts for the numerous County employee benefit program and life insurance plans. See [Human Resources Department Business Plan for Fiscal Years 2017-2018](#), February 13, 2017.

### Analysis

The County Ethics Code at Section 2-11.1(s), *Lobbying*, requires all persons, firms or corporations employed or retained by a principal who seek to encourage the passage, defeat or modifications of any ordinance, resolution, *action* or decision which may *foreseeably* be reviewed by County officials, to register as lobbyists with the Clerk of the Board. See [Lobbying FAQs](#); INQ 17-210. Individuals who seek to meet with County personnel to discuss their company’s interests in an effort to persuade the County to transact business with their company in the foreseeable future are lobbyists and are thus required to register with the Clerk of the Board prior to lobbying. See RQO 10-28. Consequently, if Mr. Paulcin is the person designated by Colonial to meet with you and other County personnel to discuss how Colonial’s

products or services will benefit Miami-Dade County in the area of employee benefits, he must register to lobby.

Mr. Paulicin wishes to register as a County vendor. Miami-Dade County has instituted a vendor registration process in order to avoid delays in the event a vendor is recommended for a contract award. Registered vendors have their company name added to a list used by Procurement and other County departments to obtain quotes for goods and services. *Refer to [Miami-Dade County official website](#)*. The County Ethics Code does not require vendors to register as lobbyists *unless* they attempt to persuade or influence County personnel to purchase their product or service. Consequently, the County Ethics Code does not preclude Colonial Life from registering as a County vendor; however, any activity which meets the definition of lobbying discussed herein requires registration.

This opinion is based on the facts as presented herein. 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](mailto:PEREZMD@miamidade.gov)

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**From:** Uppal, Namita (ISD)

**Sent:** Thursday, May 17, 2018 6:15 PM

**To:** HP Paulicin <[HP.Paulicin@ColonialLife.com](mailto:HP.Paulicin@ColonialLife.com)>

**Cc:** Gary Nabors <[Gary.Nabors@ColonialLife.com](mailto:Gary.Nabors@ColonialLife.com)>; Centorino, Joseph (COE) <[Joseph.Centorino@miamidade.gov](mailto:Joseph.Centorino@miamidade.gov)>

**Subject:** RE: Met with Commissioner Monestime - Would like to meet with you

I will have my staff reach out to for information on BidSync and vendor registration. Diana is scheduling the meeting.

By way of this email, I am asking Mr. Centorino to review and opine if you need to comply with lobbyist registration requirements at this time.

Regards,

**Namita Uppal, C.P.M.**

Chief Procurement Officer

**Miami-Dade County Internal Services Department**

111 NW 1st Street, Suite 1300, Miami, FL 33128

(305) 375-1574

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*All Lobbyists must register prior to any meeting with County Personnel. Register at: Clerk of the Board, [111 NW 1st Street, 17th Floor](#). Contact Person: Claude Francis at [305-375-5137](tel:305-375-5137).*

**From:** HP Paulicin [<mailto:HP.Paulicin@ColonialLife.com>]  
**Sent:** Wednesday, May 16, 2018 8:41 AM  
**To:** Uppal, Namita (ISD) <[Namita.Uppal@miamidade.gov](mailto:Namita.Uppal@miamidade.gov)>  
**Cc:** Gary Nabors <[Gary.Nabors@ColonialLife.com](mailto:Gary.Nabors@ColonialLife.com)>  
**Subject:** RE: Met with Commissioner Monestime - Would like to meet with you

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Hi Ms. Uppal,

If you have a Vendor List we would welcome the opportunity to register as a Vendor to receive additional information on contracts available, but Colonial Life is not a Lobbyist and we would not want to register as a Lobbyist because of the Public Sector Clients we have in place.

We provide coverage to government employees of the State of Florida and have for 55 years. We also work with other municipalities in South Florida as well as all across the United States. In addition, our relationship with NJPA, NIGP and GFOA, all Associations dedicated to the Public Sector, should be able to verify our vendor status.

Please let me know if this would help all involved?

Regards,

Henoc (HP) Paulicin, Agency Development Manager  
Colonial Life Insurance  
5200 Blue Lagoon Drive  
Suite 850  
Miami, FL 33126  
Cell: (954) 562-5597  
Email: [hp.paulicin@coloniallife.com](mailto:hp.paulicin@coloniallife.com)  
Web: [www.coloniallife.com](http://www.coloniallife.com)

Learn more about workplace benefits, healthy living, workplace trends and Colonial Life's leadership at WorkLife.

Colonial Life products are underwritten by Colonial Life & Accident Insurance Company. In New York, similar products, if approved, are underwritten by the Pauli Revere Life Insurance Company.

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**From:** Uppal, Namita (ISD) [[Namita.Uppal@miamidade.gov](mailto:Namita.Uppal@miamidade.gov)]  
**Sent:** Monday, May 14, 2018 2:39 PM  
**To:** HP Paulicin  
**Cc:** Gary Nabors; Randell, Diana (ISD)  
**Subject:** RE: Met with Commissioner Monestime - Would like to meet with you

[Principals of the firm and their representatives have to register.](#)

Regards,

**Namita Uppal, C.P.M.**  
Chief Procurement Officer  
**Miami-Dade County Internal Services Department**  
111 NW 1st Street, Suite 1300, Miami, FL 33128  
(305) 375-1574  
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**From:** HP Paulicin [<mailto:HP.Paulicin@ColonialLife.com>]

**Sent:** Monday, May 14, 2018 2:16 PM

**To:** Uppal, Namita (ISD) <[Namita.Uppal@miamidade.gov](mailto:Namita.Uppal@miamidade.gov)>

**Cc:** Gary Nabors <[Gary.Nabors@ColonialLife.com](mailto:Gary.Nabors@ColonialLife.com)>; Randell, Diana (ISD) <[Diana.Randell@miamidade.gov](mailto:Diana.Randell@miamidade.gov)>

**Subject:** RE: Met with Commissioner Monestime - Would like to meet with you

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Hi Namita. Thank you for the prompt response. I look forward to meeting you and the Director of HR. I also went to the link and signed up for an account. However, I sent the information to my superiors and a few colleagues. The consensus is that since we are not lobbyists this doesn't apply to us. I will contact Diana so that she can arrange a meeting. Be blessed.

Henoc (HP) Paulicin, Agency Development Manager  
Colonial Life Insurance  
5200 Blue Lagoon Drive  
Suite 850  
Miami, FL 33126  
Cell: (954) 562-5597  
Email: [hp.paulicin@coloniallife.com](mailto:hp.paulicin@coloniallife.com)  
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**From:** Uppal, Namita (ISD) [[Namita.Uppal@miamidade.gov](mailto:Namita.Uppal@miamidade.gov)]

**Sent:** Monday, May 14, 2018 1:23 PM

**To:** HP Paulicin

**Cc:** Gary Nabors; Randell, Diana (ISD); Cuellar, Arleene (HR)

**Subject:** FW: Met with Commissioner Monestime - Would like to meet with you

This message originated outside of Colonial Life. Use caution when opening attachments, clicking links or responding to requests for information.

Goo afternoon, We will be happy to meet with you and learn more about saving opportunities for the County. I am including our HR Director as all benefit contracts and services are managed under her department.

Diana will coordinate this meeting. In the meantime please make sure to complete lobbyist registration at <https://www8.miamidade.gov/Apps/COB/LobbyistOnline/home.aspx/Home.aspx>

Regards,

**Namita Uppal, C.P.M.**

Chief Procurement Officer  
**Miami-Dade County Internal Services Department**  
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**From:** HP Paulicin [<mailto:HP.Paulicin@ColonialLife.com>]  
**Sent:** Monday, May 14, 2018 12:44 PM  
**To:** Uppal, Namita (ISD) <[Namita.Uppal@miamidade.gov](mailto:Namita.Uppal@miamidade.gov)>  
**Cc:** Gary Nabors <[Gary.Nabors@ColonialLife.com](mailto:Gary.Nabors@ColonialLife.com)>; Randell, Diana (ISD) <[Diana.Randell@miamidade.gov](mailto:Diana.Randell@miamidade.gov)>  
**Subject:** Met with Commissioner Monestime - Would like to meet with you

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Good day, Namita, how are you? We have not met, but I recently met with Commissioner Jean Monestime last week. He suggested that I speak with you. My colleague, Gary Nabors, and I shared some information with him regarding ways of bringing about cost savings to the county in the area of employee benefits. He suggested I contact you and meet with you.

I am including a copy of the value calculator, which will provide you information about the potential savings to Miami Dade County. We were informed that there are approximately 29,000 employees working for Miami-Dade County, and we estimated the potential savings based on this figure.

We would love to meet with you to further discuss what we shared the commissioner, and how we can help the county cut benefits costs. I'm wondering if this week Wednesday or Thursday work for you, perhaps in the morning between 10:00 a.m. and 11:00 a.m.? If that doesn't work, please let me know what works best. I'm looking forward to hearing from you.

Have a great day.

Henoc (HP) Paulicin, Agency Development Manager  
Colonial Life Insurance  
5200 Blue Lagoon Drive  
Suite 850  
Miami, FL 33126  
Cell: (954) 562-5597  
Email: [hp.paulicin@coloniallife.com](mailto:hp.paulicin@coloniallife.com)  
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