

## MIAMI-DADE COMMISSION ON ETHICS AND PUBLIC TRUST

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December 3, 2021

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Delivered Via Email: [larry.dooley@stryker.com](mailto:larry.dooley@stryker.com)

Re: INQ 2021-151, Lobbying, Section 2-11.1(s), County Ethics Code

Dear Mr. Dooley,

Thank you for reaching out to the Miami Dade Commission on Ethics and Public Trust. It was a pleasure to speak with you by phone yesterday, December 2, 2021. In your initial email inquiry, you indicated that you received the following error message from the Miami Dade County Clerk's office stating that "It has been more than 60 days since you registered as a lobbyist in Miami-Dade County and you have not completed the Ethics Course ... or submitted proof of completion of an equivalent course approved by the Miami-Dade Commission on Ethics. Therefore, you are not currently in compliance with the lobbying ordinance and may have your lobbying privileges suspended" when you attempted to register as a Lobbyist for the 2022 registration period. Moreover, during our phone call, you confirmed that you had not completed an ethics course in the last year.

Based on the information provided in our phone discussion and your emailed inquiry, you have failed to complete the required biennial lobbyist refresher training facilitated by the Miami- Dade Commission on Ethics and Public Trust and thus have been prohibited from registering as a Lobbyist in Miami Dade County.

Specifically, **Sec. 2-11.1 (s)(4) (1) of the Miami Dade County Code**, mandates that "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. (Emphasis Added). See INQ 18-205, INQ 18-136

Our records indicate your initial Ethics Course was completed on June 5, 2019 and expired on June 5, 2021. You can register for the upcoming Lobbyist refresher course scheduled for Tuesday, December 22, 2021, by logging into the Miami-Dade Commission on Ethics Registration System, which can be found at the link below.

[https://w85exp.miamidade.gov/coetrainingpayweb/COE\\_Login.jsp](https://w85exp.miamidade.gov/coetrainingpayweb/COE_Login.jsp)

Please note that although a date to take the course is listed, the training course has been previously recorded and can be viewed at any time virtually after a payment has been made.

While we understand that the COVID-19 pandemic has prevented you from visiting or meeting with personnel from the Jackson Health System, we would like to take this opportunity to remind you that lobbyists who do not complete the Ethics Course within the required 60 days, may not lobby until the training has been completed. See INQ 18-96, and INQ-17-289 (Lobbyist ethics course should be completed within 60 days of initial registration as a lobbyist or must be completed prior to an individual engaging in lobbyist activities thereafter). See INQ 18-151.

This opinion is limited to the facts as you presented them to the Commission on Ethics and is limited to an interpretation of the County Ethics Code only and is not intended to interpret state laws. Questions regarding state ethics laws should be addressed to the Florida Commission on Ethics.

Thank you again for seeking guidance from the Commission on Ethics. Please do not hesitate to contact me should you require any additional assistance.

Sincerely,

Etta Akoni  
Staff Attorney  
Miami Dade Commission on Ethics and Public Trust

cc: All COE Legal Staff