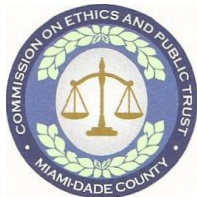


MIAMI-DADE COMMISSION ON ETHICS AND PUBLIC TRUST

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July 1, 2021

Jill Jacobs
Eleanor Joseph & Associates
Via email: Jill@ejpc.com

Re: INQ 2021-99, Lobbying, Section 2-11.1(s), County Ethics Code

Dear Ms. Jacobs,

You inquire whether a lobbyist must complete the required four-hour ethics training prior to withdrawing as a lobbyist in Miami-Dade County, and any possible ramifications if said lobbyist fails to complete the training.

The Miami-Dade County Ethics Code at Section 2-11.1(s)(2)(d) requires those who register to lobby in Miami-Dade County to complete lobbyist ethics training offered by the Miami Dade County Commission on Ethics and Public Trust within 60 days of registering as a lobbyist. Upon registering to lobby, you are permitted to commence lobbying, and then take the four-hour course within 60 days following the registration. *See* INQ 18-151, INQ 15-210, INQ 13-171, and INQ 13-189.

However, lobbyists who do not complete the lobbyist ethics training provided by the Commission on Ethics 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.

With regard on whether a lobbyist who ceases his/her lobbying activities and files his/her Notice of Withdrawal with the Clerk of the Board of County Commissioners may do so prior to completing the required four-hour ethics course, the answer is yes.

Unlike payment of the lobbyist registration fee, the four-hour ethics course is not a pre-requisite to commence lobbying activities. Therefore, an individual who registers to lobby, pays the

registration fee, lobbies (or chooses not to lobby) and then withdraws (by filing a County Notice of Withdrawal with the Clerk of the Board) *prior* to the expiration of the 60 days to complete the ethics course, *is not* required to take the course. **However, should that individual re-register to lobby at a later date, he or she must take the ethics course within 60 days of registering.** See INQ 18-233, INQ 13-171, and INQ 13-189. Lobbyists are encouraged to complete the ethics course even though they withdraw from their specific lobbying activities/representations because completion of the four-hour ethics course satisfies the *ongoing* requirement by the County for lobbyist ethics training in connection with any re-registration. See INQ 18-233, INQ 14-85, INQ 15-132 and INQ 15-162.

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,



Loressa Felix, Esq.
Staff Attorney
Miami-Dade Commission on Ethics and Public Trust

cc: All COE Legal Staff