

FNO 07-162

Meyers, Robert (COE)

From: Meyers, Robert (COE)
Sent: Monday, October 22, 2007 1:49 PM
To: 'Muriel M. Blaisdell'
Subject: RE: Interpretation of Twoyear rule

Dear Ms. Blaisdell,

On October 4, 2007, I sent Luis Otero an e-mail that sets forth my position on lobbying and the Two Year Rule. My e-mail to him stated the following: The county's Conflict of Interest and Code of Ethics Ordinance prohibits county employees from lobbying the county for two years after they leave county service. There is nothing in the ordinance that restricts a former employee from working for a company that does business with the county, however, the type of interaction with county staff should be limited. Inquiring about the status of an application does not appear to be a form of lobbying, but if the former employee were to meet with county employees during this two year period and attempt to influence their decisions in conversations with them, the Two Year Rule would be violated. In a nutshell, requesting information or submitting an application or permit would be fine, but having a discussion of a substantive matter with county staff would probably be off limits – particularly in cases where staff has discretionary authority.

The Two Year Rule draws no distinction between projects the former employee worked on when employed by the county and other matters the former employee had nothing do with when working for the County. Therefore, the anti-lobbying provisions that are in effect for all former county employees does not mean that you are barred per se from meeting with staff regarding applications you were assigned to you during your tenure at DERM. You must adhere to the abovementioned restrictions.

If you have any additional questions, feel free to contact me at your convenience.

Sincerely,

Robert Meyers, Executive Director
 Miami-Dade Commission on Ethics and Public Trust
 (305) 350-0613

From: Muriel M. Blaisdell [mailto:mblaisdell@CESMIAMI.com]
Sent: Wednesday, October 17, 2007 9:06 AM
To: Meyers, Robert (COE)
Subject: Interpretation of Twoyear rule

Dear Mr. Meyers:

As a follow-up to my e-mail of yesterday, can you please address in your response that in my dealings with DERM there is no differentiation between applications which were assigned to me for processing during my tenure at DERM and other applications.

Thank you in advance.
 Muriel M. Blaisdell

If there are any problems with this transmission or you require any additional information, please call (305) 378-5555.

Muriel M. Blaisdell
 Senior Environmental Scientist

10/22/2007

Consulting Engineering & Science, Inc.
8925 S.W. 148th Street, Suite 100
Miami, Florida 33176
Tel: (305) 378-5555
Fax: (305) 378-9304

Sent: Friday, September 21, 2007 3:07 PM
To: Meyers, Robert (COE)
Cc: Melendez, Marcia (DERM)
Subject:

Hello Mr. Meyers,

Marcia Melendez referred me to you in reference to the following situation. Recently one of the employees under my supervision left County work to join a consulting firm which regularly deals with our Section for the purpose of processing Class I permits for their clients. Class I permits are required to perform any kind of work in, on, over or upon tidal waters or coastal wetlands of Miami Dade County. The employee in question worked in the review and issuance of these permits and in her supervisory capacity also reviewed the work of junior staff. My question to you is the following: is this former employee limited in any way to enquire or do any follow up on permits applications which the company she now works for is processing and for which she was the project manager while working for DERM? Are there any other restrictions or limitations that she would be subject to? Please let me know.

Luis C. Otero, Manager
Coastal Resources Section
Miami-Dade County D.E.R.M.
701 N.W. 1st Court, 6th floor, office 209
Miami, FL 33136
(305) 372-6589 Phone
(305) 372-6479 Fax
(305) 732-1721 Pager

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Meyers, Robert (COE)

From: Meyers, Robert (COE)
Sent: Friday, October 05, 2007 11:05 AM
To: Otero, Luis (DERM)
Subject: RE:

Sorry about that. See my completed response.

Robert Meyers

From: Otero, Luis (DERM)
Sent: Friday, October 05, 2007 10:47 AM
To: Meyers, Robert (COE)
Subject: RE:

Good Morning Mr. Meyers,

I received your email but it appears that it was unfinished; can you please resend, thanks

Luis C. Otero, Manager
Coastal Resources Section
Miami-Dade County D.E.R.M.
701 N.W. 1st Court, 6th floor, office 209
Miami, FL 33136
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-----Original Message-----

From: Meyers, Robert (COE)
Sent: Thursday, October 04, 2007 11:30 AM
To: Otero, Luis (DERM)
Subject: RE:

Mr. Otero,

The county's Conflict of Interest and Code of Ethics ordinance prohibits former county employees from lobbying the county for two years after they leave county service. There is nothing that restricts a former employee from working for a company that does business with the county, however, the type of interaction with county staff should be limited. Inquiring about the status of an application does not appear to be a form of lobbying, but if she were to meet with county employees during this two year period and she attempts to influence their decisions in her conversations with them, she would be violating the Two Year Rule. In a nutshell, requesting information or submitting an application or permit would be fine, but having a discussion of a substantive matter with county staff would probably be off limits.

If you have any additional questions, feel free to contact me at your convenience.

Sincerely,

Robert Meyers, Executive Director
Miami-Dade Commission on Ethics and Public Trust
(305) 350-0613

From: Otero, Luis (DERM)