

Ethics (COE)

From: Ethics (COE)
Sent: Tuesday, February 20, 2007 4:12 PM
To: Fojo, Maria Teresa (DP&Z)
Subject: RE: lobbying

INQ 07-29

Ms. Fojo,

The County Conflict of Interest and Code of Ethics Ordinance does not punish County employees who meet with unregistered lobbyists. Penalties, however, can be imposed against the unregistered lobbyists. Obviously, our office recommends that County employees do not meet with unregistered lobbyists and we encourage other employees who are aware of such meetings to supply us with this information so we can investigate. There is a requirement in the Code section 2-11.1(s) that covers lobbying and it mentions the fact that County employees are expected to exercise due diligence before meeting with a lobbyist. Due diligence has been interpreted to mean asking the individual whether he/she is registered. If the person answers affirmatively, then the County employee can go forward with the meeting. If the person answers negatively, then the meeting should not take place. If it does, as mentioned above, the employee has not violated the ethics ordinance.

Sincerely,

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

From: Fojo, Maria Teresa (DP&Z)
Sent: Tuesday, February 20, 2007 10:13 AM
To: Ethics (COE)
Subject: lobbying

I know that we have been asked as County employees to make sure that lobbyists write their names on a list outside of our offices and that if we are lobbied by anyone that we make sure that they are registered lobbyists. What happens when someone is lobbying a county employee and the employee knows that this person is not a registered lobbyist yet they continue to help them? Are we in violation of the Code of Ethics? Please let me know the Code section and what the outcome of such a violation would be.
thank you
Maria Teresa Fojo