

February 9, 2010

**ETHICS COMMISSIONERS**

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ARDYTH WALKER  
STAFF GENERAL COUNSEL

M. Ronald Krongold  
Parrot Jungle and Gardens of Watson Island, Inc.  
1111 Parrot Jungle Trail  
Miami, FL 33132

INQ 10-27

Lobbyist Query re Ronald Krongold, Parrot Jungle

Dear Mr. Krongold:


Nicole Ewan at the City Clerk's Office in the City of Miami forwarded your query of February 8, 2010, to the Ethics Commission.

You asked, as a principal of Parrot Jungle, if you are considered a lobbyist and required to comply with all City ordinances related to lobbyist registration and disclosure. In brief, the answer is yes.

The City Attorney's Legal Opinion No 05-002 states that the City of Miami has adopted the Miami-Dade County definition of *lobbyist*, which includes *principals*. This opinion is based on the legal requirement that city ordinances cannot be less restrictive than the Miami-Dade County Code. The Miami-Dade County Code at Sec. 2-11.1 (s)(1)(b) states, "*Lobbyist* specifically includes the principal...."

Based on the forgoing, you are required to register as a lobbyist and comply with all other lobbyist requirements in the City of Miami prior to appearing before or speaking to City commissioners and City employees on behalf of Parrot Jungle.

Sincerely,

  
VICTORIA FRIGO  
Staff Attorney

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