

**Meyers, Robert (COE)**

JWA 11-03

**From:** Meyers, Robert (COE)  
**Sent:** Wednesday, January 05, 2011 1:14 PM  
**To:** 'Paul Hernandez'  
**Subject:** RE: Lobbyist Expenditures

Paul:

Thank you for your request for opinion. In my analysis of the County ethics code and the City of Miami ethics ordinance, a lobbying expenditure is one that is connected to the act of lobbying. Thus, a lunch or dinner meeting with an elected official that you paid for would not constitute a reportable lobbying expenditure if there were no discussions with the elected official about official or legislative business.

If you have any questions, please contact me at your convenience.

Sincerely,

Robert Meyers, Executive Director  
Miami-Dade Commission on Ethics and Public Trust

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**From:** Paul Hernandez [mailto:paul@lasartelaw.com]  
**Sent:** Tuesday, January 04, 2011 5:31 PM  
**To:** Meyers, Robert (COE)  
**Subject:** Lobbyist Expenditures

Good Afternoon Robert,

For the purpose of lobbyist expenditure reports for the County, the City of Miami, and the other municipalities, please provide me with a definition of what constitutes a political gift.

More specifically, please let me know if a registered lobbyist is required to report a lunch or dinner that he or she shared as friends with an elected official where no official or legislative business was discussed.

If you have any questions about this matter, please do not hesitate to contact me.

Regards,

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1/5/2011