

Frigo, Victoria (COE)

From: Frigo, Victoria (COE)
Sent: Tuesday, October 11, 2011 12:57 PM
To: Ventura, Mario (MDT)
Cc: Centorino, Joseph (COE)
Subject: Two-Year Rule (INQ 11-151, Mario Ventura)

Mr. Ventura,

You asked if you may become employed by a County vendor following your retirement from the Miami-Dade County Transit Department, where you served as Head Field Test Engineer. As we discussed, your employment with a County vendor is not prohibited, as long as you do not **lobby** the County on behalf of your new employer for two years following your departure from County service. *See* Sec. 2-11.1 (q) of the County Ethics Code.

The term “lobbying” has been interpreted very expansively by the Ethics Commission to include any attempt to influence an official government decision. Typical prohibited activities would include trying to persuade County staff to take a particular course of action or to make some specific determination on behalf of your private employer. However, you may engage in interactions with staff that are ministerial in nature, such as filing routine applications or obtaining documents.

The Ethics Commission has opined on this subject numerous times, including at RQO 01-38, RQO 02-139 and RQO 04-33. These and other opinions can be found at our website at www.MiamiDadeEthics.com.

If you have additional questions, please feel free to contact me.

Sincerely,

VICTORIA FRIGO, STAFF ATTORNEY

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