

**Frigo, Victoria (COE)**

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**From:** Ramos, Miriam S. (COE)  
**Sent:** Monday, April 09, 2012 2:22 PM  
**To:** 'Neil Kalin'  
**Cc:** Frigo, Victoria (COE)  
**Subject:** Miami-Dade Lobbyist (INQ 12-66)

Good afternoon Mr. Kalin:

Your description of your activities as a manager for CDDs does *not* constitute lobbying under the Miami-Dade County Conflict of Interest and Code of Ethics Ordinance. Section 2-11.1(s)(b) of the Ordinance defines lobbyist as, “all persons, firms, or corporations employed or retained by a principal who seeks to encourage the passage, defeat, or modification of (1) ordinance, resolution, action or decision of the County Commission; (2) any action, decision, recommendation of the County Manager or any County board or committee; or (3) any action, decision or recommendation of County personnel during the time period of the enter decision-making process on such action, decision or recommendation which foreseeably will be heard or reviewed by the County Commission, or a County board or committee.”

A previously issued ethics opinion, specifically states that a person who answers question and does not make a formal presentation is not lobbying. (see INQ 06-129)

It is recommended that you withdraw as a lobbyist, in accordance with this opinion.

In you have any further questions, please feel free to call or email me.

Regards,

*Miriam S. Ramos, Esq.*  
Deputy General Counsel

**Miami-Dade County Commission on Ethics**  
19 W. Flagler Street, #820  
Miami, FL 33130  
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**From:** Neil Kalin [mailto:NKalin@sdsinc.org]  
**Sent:** Thursday, April 05, 2012 5:39 PM  
**To:** Ramos, Miriam S. (COE)  
**Cc:** Neil Kalin  
**Subject:** Miami-Dade Lobbyist  
**Importance:** High

Dear Ms. Ramos,

Thank you so much for returning my call today to discuss lobbyist registration and compliance in Miami-Dade County, Florida. I was referred to you by Ms. Sibilía as a result of my inquiry regarding certain ethics training for lobbyists. A brief overview of my role and my inquiry on the requirement to be a registered lobbyist:

My position as District Manager ("DM") at the firm of Special District Services, Inc. ("SDS") covers administration and management of special districts in Miami-Dade County. Specifically, I manage Community Development Districts ("CDDs") which are created by adoption of an Ordinance pursuant to the authority granted by the Miami-Dade County Home Rule Charter for the purposes set forth in Chapter 190 of the Florida Statutes.

For the past twenty years I have managed special districts and during my six year tenure with SDS there have been occasions, where applicable, when I have registered as a Lobbyist. Over these six years when SDS has submitted a petition package on behalf of a client, to create a CDD, I have not lobbied any Commissioner or County Staff member on the merits or benefits of a particular CDD. My role as DM (and registered lobbyist) has been merely as a source of information in the event a Commissioner or County Staff member should have questions on the respective petition submittal to create the CDD. While serving in the capacity of registered lobbyist I filed the lobbyist expenditure report, as required. Also, for your information I have not incurred any expenses related to lobbying on behalf of any client; therefore, the reports that I have filed showed '0' dollar amounts in all listed expenditure categories.

Based on this information that I have provided I am respectfully requesting that you review my situation and provide me your opinion regarding the requirement to be a registered lobbyist in Miami-Dade County, Florida. Should you have any questions or require additional information please do not hesitate to contact me.

I look forward to hearing from you.

Sincerely,

Neil Kalin  
District Manager  
305-777-0761 Miami Lakes

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**From:** Sibilía, Rhonda (COE) [mailto:RHONDA@miamidade.gov]

**Sent:** Thursday, April 05, 2012 9:44 AM

Greetings,

According to the Clerk of the Courts, you have recently registered to lobby Miami-Dade government and, under newly enacted legislation, are required to undergo ethics training. The first class will be offered by our office on **Friday, April 27, 2012, from approximately 9 a.m. to 1 p.m.** We ask that you complete the attached registration form and pay \$100 in advance to attend. At this time, we have not yet scheduled additional classes.

I will be glad to assist if you have any questions.

Sincerely,

**Rhonda Victor Sibilía**, Community Outreach Coordinator  
**Miami-Dade Commission on Ethics & Public Trust**

19 West Flagler, Suite 820  
Miami, Florida 33130  
305-350-0631

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[miamidade.gov](http://miamidade.gov) 

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