

**Frigo, Victoria (COE)**

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**From:** Ramos, Miriam S. (COE)  
**Sent:** Thursday, May 10, 2012 12:35 PM  
**To:** Centorino, Joseph (COE); Frigo, Victoria (COE)  
**Cc:** Ceden, Rachele (COE)  
**Subject:** INQ 12-84

I spoke to attorney Derrick Waller who had questions regarding what constitutes lobbying activities. He had already spoken to Victoria.

Mr. Waller wanted to know if a grassroots organization must register to lobby. I explained that it depends on what the organization is doing - if they are meeting with County officials or speaking at meetings, then they must register; if they are going door-to-door speaking to citizens, they need not register. He asked specifically whether, if the organization encourages citizens to speak to their elected officials on an issue, they are lobbying. I explained that they would not be lobbying under those circumstances.

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