

Frigo, Victoria (COE)

From: Frigo, Victoria (COE)
Sent: Monday, July 08, 2013 1:41 PM
To: 'president@lotushouseshelter.org'
Cc: Centorino, Joseph (COE); Diaz-Greco, Gilma M. (COE); Steinback, Robert (COE)
Subject: RE: Your lobbyist training requirement (INQ 13-167)

Ms. Collins,

Mr. Steinback has asked me to respond to your question about lobbying as an unpaid volunteer on behalf of the Lotus House Women's Shelter, a 501(c)(3) nonprofit charitable organization.

The County Code at Sec. 2-11.1 (s)(4) specifically excludes you from **paying** the lobbyist registration fee if you advocate for a nonprofit and are not compensated for the appearance.

Under these circumstances, however, you nevertheless **must register** to lobby the County and take the four-hour County lobbyist ethics course within 60 days of registering. The cost of the course is \$100 for all entities, including nonprofits. *See* Sec. 2-11.1 (s)(2)(d).

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

Sincerely,

VICTORIA FRIGO, SENIOR STAFF ATTORNEY

Direct Phone: 305 350-0601
Main Number: 305 579-2594
Fax: 305 579-0273



19 West Flagler St., Suite 820
Miami, FL 33130

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From: Steinback, Robert (COE)
Sent: Monday, July 08, 2013 1:00 PM
To: Frigo, Victoria (COE)
Subject: FW: Your lobbyist training requirement

Victoria,

Could I impose on you to answer Ms. Collins' question regarding whether she needs to register as a lobbyist and take our course? Thank you...

Robert

From: Steinback, Robert (COE)
Sent: Wednesday, July 03, 2013 4:08 PM
To: 'Constance Collins'
Cc: Ramos, Miriam S. (COE)
Subject: RE: Your lobbyist training requirement

Ms. Collins,

It seems you're already registered as a lobbyist as of Feb. 19 of this year... I know there are certain exemptions for principals of certain organizations and this may apply to you, but to be sure, allow me to run your case by our legal staff for their judgment. I'll get back to you shortly.

Thank you for your patience! Have a great Fourth.

Robert Steinback
Investigator
Miami-Dade County Commission on Ethics and Public Trust
305.350.0615

From: Constance Collins [<mailto:president@lotushouseshelter.org>]]
Sent: Wednesday, July 03, 2013 2:02 PM
To: Steinback, Robert (COE)
Subject: RE: Your lobbyist training requirement

Mr. Steinback, I am a full time volunteer, serving as the President and Director of the Sundari Foundation, Inc., dba as the Lotus House Women's Shelter, a 501c3 non-profit charity. I am also a licensed attorney in good standing in the State of Florida. The only advocating I do is in my role as an officer and the director of our shelter and its initiatives. Can you say if i actually need to be registered as a lobbyist or if there might be an exemption to this requirement? I am just wondering if it is necessary as my full time++ duties at the shelter are very demanding. Thank you for letting me know. Sincerely, Constance A Collins

Constance A. Collins
Director
Sundari Foundation, Inc. dba Lotus House
Lotus House Thrift, LLC
Lotus Wellness Center, LLC
1514 NW 2nd Avenue, #1
Miami, Florida 33136
O (305) 438-0556
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----- Original Message -----

Subject: Your lobbyist training requirement
From: "Steinback, Robert (COE)" <ROBERTS@miamidade.gov>
Date: Wed, July 03, 2013 7:32 am
To: Constance Collins Margulies <president@lotushouseshelter.org>



July 3, 2013

Dear Constance Collins,

Section 2-11.1 (s)(2)(d) of the County Code requires each lobbyist to submit a certificate of completion of an ethics course approved by the Miami-Dade Commission on Ethics and Public Trust (COE) to the Clerk of the Board within 60 days after registration, unless they have taken the course within two years prior to registration.

The COE is currently reviewing all persons currently registered as lobbyists in Miami-Dade County to determine if this requirement has been satisfied. Our initial review has indicated that you have not completed the course requirement. Failure to complete this course can result in suspension of your county lobbying privileges.

We request that you do one of the following in the next 10 days:

v Use the attached form to sign up for an upcoming COE Ethics Training Class on July 16 (video) or August 15 (live class).

v If you have taken the COE Ethics Training Class within the last two years and you believe our initial review of your status is in error, please e-mail Rodzandra Sanchez, rodzand@miamidade.gov to help us correct the record of your attendance.

v It has been the general practice of this office to accept the City of Miami's Ethics Training Course, offered by Florida International University, as satisfaction of the course requirement. If you have taken that course within the last two years, please e-mail a copy of your certificate of completion, or other proof that you have done so, to Rodzandra Sanchez, rodzand@miamidade.gov. It is incumbent upon those who choose this option to contact the COE office with proof of having completed that course.

v If you have registered as a lobbyist but no longer wish to maintain your registration, please e-mail Rodzandra Sanchez, rodzand@miamidade.gov and also Miami-Dade lobbyist registrar Claude Francis, CMF@miamidade.gov, indicating your change in status.

You may also fax the COE office at 305-579-0273, or mail to Miami-Dade Commission on Ethics, 19 W. Flagler St., Suite 820, Miami, FL 33130.

Regards,

Rodzandra Sanchez
Coordinator of Administration
Miami-Dade County Commission on Ethics and Public Trust