

Frigo, Victoria (COE)

From: Frigo, Victoria (COE)
Sent: Thursday, October 10, 2013 2:06 PM
To: 'jmachado@skeletaldynamics.com'
Cc: Centorino, Joseph (COE); Diaz-Greco, Gilma M. (COE)
Subject: Lobbyist contingency fees (INQ 13-249)
Attachments: RQO 06-34 Eddy contingency fees.pdf

Mr. Machado,

Attached is the ethics opinion we discussed today that interprets the County Ethics Code at Sec. 2-11.1 (s)(7) regarding the prohibition on contingency or success fees for lobbyists.

The opinion states that traditional sales commissions are not considered contingency or success fees as proscribed in the County lobbyist ordinance. Therefore, sales commissions customarily earned by sales representatives who register as lobbyists may be agreed to without violating the County Ethics Code.

If you have additional questions, please feel free to contact me or my colleague, Gilma Diaz-Greco, Staff Attorney.

Sincerely,

VICTORIA FRIGO, SENIOR STAFF ATTORNEY

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