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**From:** Diaz-Greco, Gilma M. (COE)  
**Sent:** Monday, September 29, 2014 9:29 AM  
**To:** Sanchez, Rodzandra (COE)  
**Subject:** Anthony Cotarelo, Deputy Director, Miami-Dade Department of Public Works and Waste Management (Lobbying) INQ 14-231

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**From:** Centorino, Joseph (COE)  
**Sent:** Friday, September 26, 2014 3:57 PM  
**To:** Diaz-Greco, Gilma M. (COE)  
**Cc:** Sanchez, Gerald (CAO)  
**Subject:** INQ - Anthony Cotarelo, Deputy Director, Miami-Dade Department of Public Works and Waste Management (Lobbying)

Anthony Cotarelo, Deputy Director of the Miami-Dade County Department of Public Works and Waste Management inquired concerning whether an individuals or firms making inquiries regarding upcoming projects may be considered to be lobbyists under Section 2-11.1(s)(1)(b) of the County Conflict of Interest and Code of Ethics Ordinance. He explained that at various times he will be visited by persons representing firms that do public works projects and are interested in obtaining county work. These individuals may speak about their companies, who they are, what they do, what their capabilities are, types of projects they have performed in the past, etc. They will also inquire about upcoming County projects that are scheduled or anticipated, obviously for the purpose of considering whether they may be able to apply for County work.

Mr. Cotarelo was advised that individuals who are engaged in simply providing information about their firms or gathering information about upcoming County contracts or projects are not lobbying if they are only engaged in information exchange without attempting to influence the department regarding hiring their firm for any upcoming project or suggesting that any particular project should be performed by the County that they would be qualified to perform. As long as the exchange is purely informational and does not include any attempt to influence an action, decision or recommendation that may ultimately go before the County Commission or another County board, then the activity does not involve lobbying and the individual(s) involved need not register as lobbyists. It was suggested to Mr. Cotarelo to keep separate conversations regarding the qualifications of any particular company or firm and a discussion about particular upcoming projects, lest the conversation veer into an attempt to have one's company hired for that particular project. If an individual is a registered lobbyist, then, of course, there would be no such limitation.

### *Joseph M. Centorino*

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