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**From:** Diaz-Greco, Gilma M. (COE)  
**Sent:** Thursday, November 06, 2014 11:41 AM  
**To:** Sanchez, Rodzandra (COE)  
**Subject:** Tim Gomez- Floridian Partners (lobbying and not-for-profit organizations) INQ 14-260

INQ 14-260

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**From:** Diaz-Greco, Gilma M. (COE)  
**Sent:** Thursday, November 06, 2014 11:35 AM  
**To:** 'TGomez GOMEZ'  
**Cc:** Centorino, Joseph (COE)  
**Subject:** Tim Gomez- Floridian Partners (lobbying and not-for-profit organizations) INQ 14-260

Dear Mr. Gomez:

It was a pleasure to speak with you. You inquired about the lobbying registration requirements for not-for-profit organizations. As we discussed, the Miami-Dade County Code at § 2-11.1(s)(4) provides that any person who appears as a representative of a not-for-profit corporation or entity to express support of or opposition to any item, is required to register as a lobbyist, but is not required to pay any registration fees. Consequently, employees, officers, and any person lobbying on behalf of not-for-profit organizations are required to register as lobbyists, but do not have to pay the registration fee. See also INQ 11-184. However, lobbyists who represent nonprofit 501(c)(3) organizations are not exempt from the requirement that lobbyists take the County ethics training course within 60 days of registering or paying the \$100 fee for the course. See the Miami-Dade County Code at § 2-11.1 (s)(2)(d), and INQ 13-180.

Unpaid volunteers lobbying on behalf of not-for-profit organizations are considered lobbyists and would therefore be required to register, would not have to pay a registration fee, but would be required to take the County Ethics training course and pay the \$100 course fee. See e.g., (INQ 13-167). Additionally, pursuant to the County Ethics Code at § 2-11.1(s)(6) if lobbyists have expenditures to report, they must file Annual Expenditure Reports.

Please note that the County Ethics Code provides a narrow exemption to the registration requirement for representatives of not-for-profit organizations: Section 2-11.1(s)(1)(b) provides that unpaid representatives of not-for-profit community-based organizations who only are seeking grant funding and not lobbying on other matters at the same time, are not required to register as lobbyists.

Please contact us if we may be of further assistance.

Best regards,

Gilma (Mimi) Diaz-Greco  
Staff Attorney



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**From:** TGomez GOMEZ [<mailto:timgomez3@gmail.com>]  
**Sent:** Wednesday, September 24, 2014 3:13 PM  
**To:** Diaz-Greco, Gilma M. (COE)  
**Subject:** Request regarding requirement to take the Lobbyists Ethics Training

Ms. Diaz-Greco,

Can you please let me know if an Executive Director of a not-for-profit and the Chairman of that not-for-profit's board are required to take the Lobbyists' Ethics Training?

These persons did, out of an abundance of caution, register as lobbyists at Miami-Dade County before meeting with the Mayor on an issue. However, I am confused as to whether or not they actually fall under the definition of lobbyist.

Thank you in advance for any assistance you might be able to provide.

Tim Gomez

