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**From:** Diaz-Greco, Gilma M. (COE)  
**Sent:** Wednesday, April 02, 2014 12:16 PM  
**To:** Sanchez, Rodzandra (COE)  
**Subject:** Ethics Opinion INQ 14-85

INQ 14-85

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**From:** Centorino, Joseph (COE)  
**Sent:** Wednesday, April 02, 2014 11:59 AM  
**To:** 'jkorn@cohenlaw.com'  
**Cc:** Diaz-Greco, Gilma M. (COE); Sanchez, Gerald (CAO)  
**Subject:** INQ - Jason Korn, Registered Lobbyist

Mr. Korn:

You have inquired as to whether your completion of the lobbyist ethics course within 60 days of your initial registration as a lobbyist on August 9, 2013, would satisfy any ongoing requirement by the county for lobbyist ethics training in connection with your recent registration on February 26, 2014. It is my interpretation of Section 2-11.1(s)(2)(d) and the intent behind the ordinance that it would not require you to complete an additional ethics training course within such a short period of time since you originally took the course. The language of the ordinance was clearly intended to apply to individuals whose lobbyist registration lapsed for a period longer than the two years for which the training is intended to apply. It would be absurd to require someone who registered in November and took the course in December, to take the same course in February after re-registering in mid-January. Your case is not far removed from such an extreme example. Accordingly, you are advised that 1) you are not required to take an additional lobbyist ethics course within sixty days of your February 26 registration; 2) for purposes of the ethics course requirement, your re-registration shortly after the first of the year and your presumed continued status as a registered lobbyist during the two year period following your initial taking of the course on September 10, 2013, would require only that you complete the refresher course within two years of the September 10 course date.

Sincerely,

Joseph M. Centorino  
Executive Director and General Counsel  
Miami-Dade Commission on Ethics and Public Trust

**From:** [jkorn@cohenlaw.com](mailto:jkorn@cohenlaw.com) [<mailto:jkorn@cohenlaw.com>]  
**Sent:** Tuesday, April 01, 2014 5:17 PM  
**To:** Centorino, Joseph (COE)  
**Subject:** Registration of Jason Korn / Lobbyist Ethics Course Question/Confirmation

To: Joseph M. Centorino, Executive Director, Commission on Ethics and Public Trust, Miami-Dade County

Joe,

This email will follow up on our discussion of this afternoon. The question I posed was based upon the following:

1. On August 9, 2013, I filed my Lobbyist registration form with Miami-Dade County, identifying Oxford Electronics, Inc. as the principal.

2. On September 10, 2013, I completed the required initial ethics course offered by the Miami-Dade County Commission on Ethics and Public Trust ("Ethics Course"). This course was completed within the required 60 day period after my initial registration as a lobbyist in accordance with Section 2-11.1(s)(2)(d) of the Miami-Dade County Conflict of Interest and Code of Ethics Ordinance ("Code").

3. On February 26, 2014, I filed another Lobbyist registration form with Miami-Dade County, identifying Oxford Electronics, Inc. as the principal.

Section 2-11.1(s)(2)(d) of the Code indicates that lobbyists who have completed an initial Ethics Course and have "continuously registered" as a lobbyist thereafter shall be required to complete a refresher Ethics Course every two years.

Questions:

A. Am I required to take another Ethics Course within 60 days of my February 26, 2014 registration?

B. Or, is my February 26, 2014 registration considered to be "continuously registered" such that I only have to take an ethics "refresher course" within the two year period from September 10, 2013?

You indicated that you believed I should be considered to be "continuously registered" and that I would only have to take a refresher course within the two year time period (not within the 60 day period). However, I wanted to make sure I had confirmation.

Respectfully,

Jason Hunter Korn

**cohen&grigsby**<sup>®</sup>

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