



To: Walter Foeman, City Clerk for the City of Coral Gables

From: Mariam S. Ramos, Deputy City Attorney for the City of Coral Gables

Approved: Craig E. Leen, City Attorney for the City of Coral Gables

A handwritten signature in black ink, appearing to be "CL", is written over the name of the City Attorney.

RE: Legal Opinion Regarding Lobbyist Registration Forms

Date: January 23, 2017

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Regarding lobbyist registration forms, there is nothing that prohibits the electronic registration (including payment) of lobbyists. In fact, Miami-Dade County uses an online registration system. Further, there is nothing in the City Code that requires original lobbyist registration forms be filed. Sec. 2-243(b)(3) of the City Code, does require that the lobbyist "state under oath" certain information. Therefore, the online system should include a statement to that effect and require that the individual check, initial or otherwise note their understanding and acceptance of the fact that the information provide is provide under oath.

Regarding financial disclosure forms, the Miami-Dade Ethics Commission issued an opinion directly on point in 2013, regarding County (municipal) financial disclosure filing, which can be found at: [http://ethics.miamidade.gov/library/opinions/2013/rqo\\_13-02\\_white.pdf](http://ethics.miamidade.gov/library/opinions/2013/rqo_13-02_white.pdf) For those required to file State financial disclosure forms, the form only contemplates the filing of originals via U.S. mail and explicitly states that facsimiles are not accepted. Based on this and in the absence of an opinion to the contrary, I conclude that State financial disclosure forms may not be filed electronically.

This opinion is issued pursuant to Sec. 2-201(e)(1) and (8) and Sec. 2-237 of the City Code, authorizing the City Attorney's Office to issue opinions and interpretations on behalf of the City.

**From:** [Leen, Craig](#)  
**To:** [Paulk, Enga](#)  
**Cc:** [Ramos, Miriam](#)  
**Subject:** FW: Request for Advisory Opinion  
**Date:** Sunday, January 22, 2017 12:14:07 AM  
**Attachments:** [image001.png](#)  
[image002.png](#)

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Please publish.

**Craig E. Leen, City Attorney**

*Board Certified by the Florida Bar in  
City, County and Local Government Law*  
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**From:** Ramos, Miriam  
**Sent:** Friday, January 20, 2017 2:03 PM  
**To:** Dacosta, Susan <[sdacosta@coralgables.com](mailto:sdacosta@coralgables.com)>; Leen, Craig <[cleen@coralgables.com](mailto:cleen@coralgables.com)>  
**Cc:** Foeman, Walter <[wfoeman@coralgables.com](mailto:wfoeman@coralgables.com)>  
**Subject:** RE: Request for Advisory Opinion

Dear Walter,

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[http://ethics.miamidade.gov/library/opinions/2013/rqo\\_13-](http://ethics.miamidade.gov/library/opinions/2013/rqo_13-02_white.pdf)

[02\\_white.pdf](http://ethics.miamidade.gov/library/opinions/2013/rqo_13-02_white.pdf) For those required to file State financial disclosure forms, the form only contemplates the filing of originals via U.S. mail and explicitly states that facsimiles are not accepted. Based on this and in the absence of an opinion to the contrary, I conclude that State financial disclosure forms may not be filed electronically.

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*Miriam S. Ramos, Esq.*

Deputy City Attorney & City Prosecutor

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**From:** Dacosta, Susan  
**Sent:** Wednesday, January 18, 2017 3:31 PM  
**To:** Leen, Craig  
**Cc:** Ramos, Miriam; Foeman, Walter  
**Subject:** FW: Request for Advisory Opinion

City Attorney's Office

On behalf of Walter Foeman, please see attached memo requesting an advisory opinion, in connection with filing original documents versus electronic documents.

Thank you,

*Susan DaCosta*  
*Administrative Assistant to*  
*Walter J. Foeman, City Clerk*  
*City of Coral Gables*  
*405 Biltmore Way*  
*Coral Gables, FL 33134*  
*305-460-5210*