

Lobbyist Activities Guidelines

Policy 1100B outlines the rules associated with lobbyist activities. It is important to emphasize the policy specifically addresses the actions of lobbyists and it is solely the responsibility of the lobbyists to comply with the rules of the policy. Additionally, nothing contained within the policy or these guidelines is intended to relieve the lobbyist of any and all federal and state regulations related to lobbyists and any obligations to report such activity.

On December 15, 2009, the Board approved amendments to this policy in an effort to clarify the policy intentions and include a penalty provision for violating its established rules. These guidelines have been developed to provide further information and clarification in the implementation of Policy 1100B.

The policy statement reads;

“All persons acting as lobbyists must register with the District annually and disclose the identity of the principal (see rule 2 for definition of principal) whom they represent at the beginning of every communication, when the intent of the communication is to lobby. This includes such communications with the School Board, School Board Members, Superintendent, School Board committees, School Board administrative assistants, and employees of the Broward County School Board. All lobbyists must comply with the rules set forth in this policy.”

The overarching intent of this statement and the policy is not to discourage lobbying activities, but rather to bring transparency to such activities. By requiring lobbyists to register annually, the District is able to maintain an active record of all lobbyists and post such information for the community. It is important to emphasize that the requirement for disclosure prior to communications is only pertinent in those instances when the intent of the communication is to lobby/influence the business of the School Board. This policy is not intended to impact general communications between School Board Members or staff and individuals who may lobby.

Example: An individual and a Board Member jointly serve on a community committee. The individual is not required to disclose they are a lobbyist prior to communicating with the Board Member about the committee’s business or any other general topic of discussion. However, if the individual is representing an entity that has a business issue coming before the School Board and desires to discuss the issue with the Board Member at the committee meeting, it is expected the individual would be registered as a lobbyist for the entity with the District and preface the conversation with the fact that he/she is representing the entity in a lobbyist capacity.

Requiring individuals to disclose they are lobbying on behalf of an entity creates clear boundaries for such activities, and provides an opportunity for School Board Members or District staff to determine if they want to entertain such communications.

Definitions

Lobbyist is defined as “any individual, firm, corporation, or other business entity who engages in lobbying for the economic gain of a principal, regardless of whether they are compensated for lobbying or not. The term *lobbyist* specifically includes the principal, as well as any agent, officer, or employee of a principal regardless of whether or not the employee’s normal scope of employment includes lobbying activities.”

The policy’s definition of lobbyist is specifically broad to account for all practical forms of “lobbying”. Owners, agents, and employees of a principal are also considered lobbyists *when they engage in lobbying activities for economic gain*. This would include the principal’s lawyer. Simply because the individual lobbying on behalf of the principal is a lawyer does not exempt him or her from registering as a lobbyist prior to engaging in lobbying activities aimed at influencing a Board Member or District staff for the economic gain of the principal. The only exception for lawyers pertains to the representation of a client during legal proceedings. Again, this is not to preclude an owner or agent of a business entity from engaging in lobbying activities, it only requires such individuals to register as lobbyists and disclose their intentions prior to any communication when the intent of the communication is to lobby for a financial interest or economic gain. To the contrary, communications regarding the routine business interactions of previously awarded contracts, projects or issues are not considered lobbying.

Example: A contractor is awarded a contract for a capital project. The owner and employees of the contractor have regular communications and interactions with Board Members and/or employees of the District regarding the implementation of this project. These communications are not considered lobbying and are exempt from the requirements of the policy. However, if the owner, agent, or employee of the contractor has any communication with Board Members or employees of the District for the purpose of influencing the award of future projects, this is considered lobbying and the individual should be registered as a lobbyist and disclose his or her intent to lobby prior to such a communication. Further, if the solicitation for such construction services had been issued prior to the lobbying, this would constitute a violation of the District’s Cone of Silence and Rule 10 of the policy.

It is also important to clearly identify those individuals not considered to be lobbyists. These include:

- Individuals representing school allied groups (e.g. PTA, District Advisory, Band Booster Associations, etc.),
- A public official or employee of a governmental agency acting in his or her official capacity,
- An attorney representing a client in a judicial or formal administrative proceeding conducted pursuant to Chapter 120 (or any other formal hearing before an agency, board, commission, or authority of this state),
- Any person in his or her individual capacity for the purpose of self-representation.

These exclusions to the lobbyist definition are specifically included to encourage the interaction between elected official and their constituents.

Principal is defined as “the individual, firm, corporation, or other business entity which has employed or retained the services of a lobbyist or which stands to benefit from lobbying activities.”

Simply stated, a principal is the benefactor of the lobbying efforts. It is important to stress that principals are considered lobbyists when they conduct lobbying activities for their own benefit regardless of whether they have technically hired a lobbyist or not. This is codified by including a principal in the definition of a lobbyist, combined with the indication that a principal is the entity which stands to benefit from lobbying activities.

Lobbying is defined as “any communication (on behalf of a principal) for the purpose of influencing any action, non-action, or decision or attempting to obtain the good will of a School Board Member or employee of the school District where there would be an economic gain to the principal.” This is applicable to such communications with:

- The School Board
- Member(s) of the School Board
- School Board Committees
- School Board Administrative Assistants
- Employees of the Broward County School Board

The key distinction in the definition of lobbying is “*where there would be an economic gain.*” This language is specifically included in the definition to differentiate between a business purpose and a policy purpose. It is not intended to have individuals who want to influence the policy decisions of the Board to abide by the lobbyist policy. However, the definitions of lobbyist, principal, and lobbying have been crafted to address efforts of specific individuals to persuade the business decisions of the Board.

It is also important to distinguish that solicitations and marketing efforts are not defined as lobbying. Board members and District employees routinely receive solicitations introducing products or services offered by a company. Routinely, these solicitations are reviewed by appropriate staff to determine the need for such products or services. If such a need exists, staff may develop a competitive solicitation for such products or services. At this juncture, the lobbyist policy may apply on future communications depending on the nature of the communication.

Example: The Marketing Director of Company ABC meets with staff to introduce the products and services of his company and indicates how utilizing such services would benefit the District. This communication by itself would not be considered lobbying, and the Marketing Director would not have to be registered as a lobbyist under the requirements of the policy. However, after the meeting, if it became known by the Marketing Director that the District was preparing a competitive solicitation for certain services offered by Company ABC, and the Marketing Director wanted to meet with the Superintendent or specific Board Members prior to the issuance of the RFP to specifically lobby to have the work awarded to ABC, then this communication would be considered lobbying under the policy. It is expected the Marketing Director would be registered as a lobbyist for Company ABC and indicate the purpose of any such meeting was to lobby on behalf of Company ABC. More importantly, if this example of lobbying had occurred after the RFP had been issued and before award, this would be a violation of the "Cone of Silence" and Company ABC's proposal would be considered not responsive and ineligible for award. It would also constitute a violation of Rule 10 of the policy, and the Marketing Director would be subject to penalty under the terms of the policy.

Immediate Family is defined as "spouse, mother, father, children, or sibling(s) and those immediate family members of the spouse."

Disclosure

Lobbyists must be registered prior to engaging in any lobbying activities with District by completing a Lobbyist Registration Statement form for each principal they represent. Forms can be obtained in the Office of the Executive Director, Public Relations & Governmental Affairs, and is available on-line at the department’s website at <http://www.browardschools.com/prga/pdf/government/LobbyistRegistration.pdf>

THE SCHOOL BOARD OF BROWARD COUNTY, FLORIDA
 600 NORTHEAST THIRD AVENUE - FORT LAUDERDALE, FLORIDA 33301-3123 - TEL: 784-323-2300 - FAX 784-323-2318

LOBBYIST REGISTRATION STATEMENT

Lobbyists are required to submit a Registration statement to the office of Public Relations & Governmental Affairs. Statements must be filed annually and are due by July 1st. Lobbyists are required to register for each principal prior to any lobbying activities.

LOBBYIST INFORMATION

Name: _____
 (Please print) (Last) (First) (M.I.)

Address: _____
 (Residence)

Company Name: _____

Company Telephone Number: _____

E-mail Address: _____

Company Address: _____

Nature of Business: _____

Do you have any direct business association with a current elected or appointed official or employee of Broward County Public Schools? ("Direct business association" is defined as any mutual endeavor undertaken for profit or compensation.) No Yes
 If yes, please explain. Use additional paper if necessary.

Are you a former member of The School Board of Broward County, Florida or a relative of any School Board Member? Yes No
 If yes, please explain. Use additional paper if necessary.

PRINCIPAL'S INFORMATION

Principal Represented: _____
 (Please print)

Telephone Number: _____

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Address: _____

Principal's Business: _____
 (Please print) (General) (Specific)

CERTIFICATION

I do solemnly swear or affirm that all the foregoing facts are true and correct and that I have read School Board Policy 1100 B-Lobbyist Activities for Economic Gain and that I am aware of the requirements for periodic filing and submission of other statements.

Signature of Lobbyist _____

STATE OF FLORIDA
 COUNTY OF _____

On this the _____ day of _____, 20____ before me, the undersigned Notary Public of the State of Florida, personally appeared _____
 (name of individual who appeared before notary) whose name(s) is/are subscribed to the written instrument, he/she/they acknowledge that he/she/they executed it.

Notary Public, State of Florida _____

My commission expires: _____
 _____ Personally known to me, or
 _____ Produced identification _____ (Type of I.D. produced)
 _____ DID take an oath, or _____ DID NOT take an oath.

Further, I understand that I am required to notify SBBC of any changes to the information contained herein and that I am required to register for each new principal on whose behalf I lobby.

Signature of Lobbyist: _____ Date: _____

CHECK LIST (Please initial)
 _____ Engagement or Authorization Letter Attached _____ Initial.

Return completed form to: Public Relations & Governmental Affairs, 600 SE Third Avenue, 2nd floor, Fort Lauderdale, FL 33301

TCOPH-06 Rev. 08/07/12

This form must be completed prior to engaging in any lobbying activities and must be re-filed annually prior to July 1st. The Lobbyist Registration Statement form must include an engagement or authorization letter signed by the principal, or an authorized representative of the principal, authorizing the lobbyist to represent the principal. The Lobbyist Registration Statement includes a checklist to assert the engagement/authorization letter has been provided. Additionally, the lobbyist must disclose any direct business association with current School Board Members, employees of the District, or any immediate family of the School Board Members or employees, within the space provided on the form. Direct business association is simply defined as any mutual endeavor undertaken for profit or compensation. (The definition of a direct business association is not intended to be so far reaching to include present or past legal clients, for example. A registered lobbyist would not need to identify a direct business association with a District employee because he or she is currently representing, in his or her professional capacity, that employee.) Finally, the registration form must be notarized, asserting the accuracy of the information and understanding of the rules set forth.

The Office of the Executive Director, Public Relations & Government Affairs will maintain an active list of all registered lobbyists and the principals which they represent. This list will

also be made available on-line at the department’s website at <http://www.browardschools.com/prga/lobbyist-list.htm>

Should the lobbyist-principal relationship end, it is recommended the lobbyist or principal provide such information to the Office of the Executive Director, Public Relations & Government Affairs, in order to maintain the accuracy of the list of registered lobbyists. The Notice of Cancellation of Lobbyist Registration form was developed to provide such notice to the District, and is available on-line at http://www.browardschools.com/prga/pdf/government/lobbyist_cancellation.pdf. If a Notice of Cancellation form is not provided to the District, the information contained within the active list of registered lobbyists will not be updated until July 1st when the lobbyist statement form is not re-filed.

THE SCHOOL BOARD OF BROWARD COUNTY, FLORIDA
 600 SOUTHBEACH TRIBE AVENUE • FORT LAUDERDALE, FLORIDA 33301 • TEL: 754-321-2000 • FAX: 754-321-2018

NOTICE OF CANCELLATION OF LOBBYIST REGISTRATION

Please Type or Print as follows

Lobbyist Name:

Last Name _____ First Name _____ MI _____

Business/Firm Name _____

Address _____

City _____ State _____ Zip _____

Email Address _____

Principal Represented:

Business/Firm Name _____

Address _____

City _____ State _____ Zip _____

Date Representation Ended: _____

Signature of Lobbyist _____ Date ____/____/____

Broward County Public Schools, Public Relations & Government Affairs Department
 Kathleen C. Wright Building 400 S.W. Third Avenue, 7th Floor, Fort Lauderdale, FL 33301
 Office: 754-321-2505 • Fax: 754-321-2318

ETH-05 12/09

In addition to completing a Lobbyist Registration Statement form for each principal a lobbyist represents, the lobbyist is required to disclose his or her intent to lobby a School Board Member or District employee prior to all communications intended for such a purpose. This allows Board Members to determine whether they wish to entertain such communication.

Prohibition of Lobbying

There are only two prohibitions to lobbying. The first prohibition is during the “Cone of Silence.” The Cone of Silence is the period of time during the competitive procurement process from the time the solicitation is issued or made public to the time the Board takes action on a recommended award of the solicitation.

Routinely, the Supply Management & Logistics Department issues solicitations for products or services through a competitive procurement process. The solicitation may be an Invitation to Bid (ITB), Request for Proposals (RFP), or other document requesting competitive proposals for products or services. Once a competitive solicitation is issued, any individual (including a lobbyist) is prohibited from discussing the nature of the competitive procurement with the Board, Board Member(s), the Superintendent, Evaluation Committee Member(s), or any employee of the District other than those individuals specified within the terms and conditions of the solicitation. The solicitation will identify the appropriate individuals within the Supply Management & Logistics

Department where questions regarding the solicitation may be posed for answer. Clearly, this does not prohibit individuals from communicating with the Board or staff on other issues. The prohibition is strictly limited to communications relative to the solicitation. The Cone of Silence ends following Board action on the recommended award.

The Board shall be provided weekly information on Cone of Silence and competitive solicitations which are included within the Cone. Additionally, Evaluation Committee Members will receive written communication upon being appointed to any evaluation committee advising them of the Cone of Silence, their obligation to refrain from any discussions relative to the solicitation, and the need to report any attempts to discuss the solicitation. Supply Management & Logistics will also reiterate the Cone of Silence prior to the actual evaluation deliberations to ensure there have been no potential violations.

The second prohibition pertains to former School Board Members and former employees of the District. Senior-level employees, defined as Pay Grade 30 and above, and School Board Members are prohibited from participating in lobbying activities for one year after employment or term of office has been severed.

Reporting a Potential Violation

Any individual wishing to report a potential violation to the policy must initiate a sworn complaint with the Office of the Executive Director, Public Relations & Governmental Affairs. The policy requires a sworn complaint to be initiated for all alleged violations of Policy 1100B to ensure the veracity of an alleged violation and to prevent the potential abuse of anonymous complaints for inappropriate purposes. Further, as all alleged violations will be reviewed by the Superintendent or his or her designee, it is important to prevent the waste of valuable time and resources incurred when investigating frivolous complaints.

Investigation of Violations

In the event a potential violation of the lobbyist policy is reported to the District, the Superintendent or his or her designee will initiate an investigation to determine if there has been an actual violation of the policy provisions. The scope of the investigation shall be determined by the Superintendent or their designee based on the nature of the alleged violation. If it is apparent no violation has been committed the extent of the investigation may be limited to only a cursory review of the alleged violation and the policy. Otherwise, the Superintendent or his or her designee shall conduct such investigation as he or she deems necessary under the circumstances.

In the event a violation is found to have been committed, the Superintendent shall make a recommendation for penalty to the Board. The matrix below provides guidelines on

potential violations to the policy and the penalties which may be recommended for such a violation. Keep in mind, this matrix is for illustrative purposes only and the recommended penalty is the discretion of the Superintendent or his or her designee. Additionally, the Board has the final authority to impose any penalty it deems appropriate given the nature of the alleged violation and the results from the investigation.

Penalty Matrix

Penalty	Potential Violation for Penalty
Warning	-Lobbyist is late to re-file the registration statement with the Office of the Executive Director, Public Relations & Governmental Affairs -Lobbyist fails to preface his or her intent to lobby prior to a communication intended to influence a business action of the Board
Reprimand	Lobbyist engages in repeated lobbying activities on behalf of a principal without filing a registration statement
Suspension	Lobbyist violates the “Cone of Silence” and engages in lobbying activities relative to a competitive solicitation prior to the award
Prohibition from Lobbying	Lobbyist falsifies documentation on file with the Office of the Executive Director, Public Relations & Governmental Affairs, and intentionally misrepresents information relative to issue forthcoming for Board action

The School Board shall impose more severe penalties to lobbyists previously found in violation of Policy 1100B.

If a penalty is to be recommended, the lobbyist allegedly in violation shall be provided reasonable notice of the penalty recommendation and be provided an opportunity to be heard. If the investigation results in the recommendation for a penalty, it is likely discussions with the alleged lobbyist would have been included as a component of the investigation. If the alleged lobbyist disagrees with findings of the investigation or the recommended penalty, the individual will have the opportunity to a hearing where a Hearing Officer will issue a recommended order on the matter. Further, the alleged lobbyist will have the opportunity to file objections to the recommended order prior to its submission to the Board.

The recommended order and any objections will then be presented to the Board. Ultimately, the Board has the final authority to dispose of the recommended order. The Board could potentially:

- Approve the recommended order of the Hearing Officer

- Amend the recommended penalty issued within the order and approve an alternative penalty within the scope of the policy
- Reject the recommended order

In the event the Board approves a recommended order of the Hearing Officer which finds the lobbyist violated the policy, the affected lobbyist will be responsible for reimbursing the District for all expenses associated with the hearing.

Frequently Asked Questions

Q: Is the lobbyist policy intended to prohibit or discourage lobbying?

A: No. There are only two prohibitions to lobbying (during the Cone of Silence and former School Board Members and employees for one year) The policy is intended to provide transparency for lobbying activities.

Q: If I wish to discuss a Board agenda item with my elected Board Member, am I required to be registered as a lobbyist under the policy?

A: Individuals representing their own capacity for the purpose of self-representation are exempt from the definition of a lobbyist. Even if the individual discussing the matter is a lobbyist, he or she is not considered lobbying if they are expressing their individual thoughts on the issue. Unless the agenda item pertains to an award of business and you are officially representing a third-party in a lobbying capacity (regardless of whether you are compensated or not), you are exempt from the lobbyist policy.

Example: There is an agenda item regarding the purchase of land. Individuals are not required to register as lobbyists to discuss their personal views on the item. This constitutes self-representation and advocacy. However, if the individual is discussing the item with a Board Member or District staff person trying to influence the outcome of the decision specifically on behalf of the current owner's interests, this would constitute lobbying.

Q: If I am the owner of a company currently doing business with the District, am I required to be registered as a lobbyist under the policy before speaking with a Board Member(s)?

A: No. The only requirement for the owner of a company to register as a lobbyist is if that individual wanted to specifically lobby the Board, Board Member(s), or District staff in an attempt to influence for economic gain.

Q: As a member of a school allied group (such as the PTA), am I required to register as a lobbyist before speaking with School Board Members?

A: No. School allied groups are exempt from the definition of a lobbyist.

Q: If I am a registered lobbyist with the District, must I disclose this fact prior to all communications with Board Members or the District?

A: No. Lobbyists are only required to disclose their intent to lobby on behalf of a principal prior to communications when the communication is intended for such a purpose.

Q: As a lobbyist, may I include the list of all principals I represent on a lobbyist statement form?

A: No. An individual Lobbyist Registration Statement form must be completed for each principal represented by the lobbyist for whom the lobbyist intends to lobby the District. This is necessary because the form requires the signature of the principal authorizing the lobbyist to represent the principal.

Q: If I am a lobbyist already registered with the County, must I again register with the School Board?

A: Yes.

Q: Once I have registered as lobbyist with the District, must I register again before lobbying relative to new issue?

A: Lobbyists are required to file a new Lobbyist Registration Statement form for each principal they represent prior to engaging in lobbying activities on behalf of that principal, and re-file a lobbyist statement form for each applicable principal prior to July 1st each year.

Q: What happens if an individual is retained to lobby on behalf of a principal after the July 1st filing requirement?

A: A lobbyist must register prior to engaging in lobbying activities. The July 1st deadline is relevant to re-filing for the subsequent fiscal year (the District's fiscal year is July 1st-June 30th). See example below.

Example: A lobbyist is retained on behalf of a principal to lobby the School Board in April regarding an issue for the economic gain of the principal. Prior to engaging in lobbying activities, the individual is required to register as a lobbyist with the Office of the Executive Director, Public Relations & Governmental Affairs. Assuming the lobbying activities will continue beyond June 30th, or the lobbyist wishes to continue to be recognized as a registered lobbyist for that principal for the next fiscal year, the lobbyist is required to re-file a lobbyist statement form prior to July 1st.

Q: If I am no longer a lobbyist for a specific principal, am I required to notify the District?

A: Lobbyists are encouraged to complete a Notice of Cancellation of Lobbyist Registration form when the lobbyist is no longer representing a principal. Submitting this form will allow the District to maintain the accuracy of its list of registered lobbyists. Otherwise, the list will be updated on July 1st when the lobbyist statement form is not re-filed.

Q: Can a Board Member or staff violate the Lobbyist policy?

A: The only rule within the policy impacting a Board member or staff is Rule 8, which states "Senior-level employees (pay grade 30 and above) and School Board Members are prohibited from lobbying activities for one year after employment or term of office has been severed." Remember this policy focuses on the actions of the lobbyist. It is inherent upon the lobbyist to comply with the rules set forth in the policy.

Q: How should an individual report a violation to the lobbyist policy?

A: Individuals are required to file a sworn complaint with the Office of the Executive Director, Public Relations & Governmental Affairs to report a violation of the lobbyist policy.

Q: Are all complaints investigated?

A: All complaints are reviewed, and the Superintendent or his or her designee will conduct such an investigation as they deem appropriate based on the alleged violation.

Q: If a complaint is filed against me as a lobbyist will I be notified?

A: A lobbyist must be notified by the District and provided an opportunity to be heard prior to any recommended penalty being presented to the Board. If it is determined no

violation of the policy has occurred, the lobbyist may or may not be notified of the alleged complaint.

Q: Are there predetermined penalties for a violation to the policy?

A: The School Board may warn, reprimand, suspend, or prohibit a lobbyist from lobbying the District for a period of time not to exceed two years for violations to the policy. Although a penalty matrix exists to provide a framework for the potential penalty for certain violations, the Board has the ultimate decision to approve, amend or reject the recommended penalty.

Interpretations

If an individual is uncertain how any intended action may be impacted by this policy, it is recommended he or she seeks clarification prior to taking such action. To obtain an interpretation of the policy, an individual should submit written correspondence to the Superintendent of schools outlining the issue or concern, and request clarification under the policy. The Superintendent, or his or her designee, will collaborate with the General Counsel's Office to issue a response to such inquiries.

Revisions to These Guidelines

These guidelines have been developed in an effort to provide clarification to facilitate the implementation of this policy. These guidelines will be continuously enhanced to address future considerations which may arise in order to provide full clarification of the policy's intent. Modifications to the guidelines will only be made if they further clarify the original intent of the policy as amended on December 15, 2009. To the extent future considerations require a modification or expansion of the policy; staff will seek such modifications through formal policy revision.



THE SCHOOL BOARD OF BROWARD COUNTY, FLORIDA

LOBBYIST REGISTRATION STATEMENT

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LOBBYIST INFORMATION

Name: _____
(Please print) (Last) (First) (M.I.)

Address: _____
(Residence)

Company Name: _____

Company Telephone Number: _____

E-mail Address: _____

Company Address: _____

Nature of Business: _____

Do you have any direct business association with a current elected or appointed official or employee of Broward County Public Schools? ("Direct business association" is defined as any mutual endeavor undertaken for profit or compensation.) _____ No _____ Yes
If yes, please explain. Use additional paper if necessary.

Are you a former member of The School Board of Broward County, Florida or a relative of any School Board Member? _____ Yes _____ No.
If yes, please explain. Use additional paper if necessary.

PRINCIPAL'S INFORMATION

Principal Represented: _____
(Please print)

Telephone Number: _____

Address: _____

Principal's Business: _____
(Please print) (General) (Specific)

CERTIFICATION

I do solemnly swear or affirm that all the foregoing facts are true and correct and that I have read School Board Policy 1100 B-Lobbyist Activities for Economic Gain and that I am aware of the requirements for periodic filing and submission of other statements.

Signature of Lobbyist

STATE OF FLORIDA
COUNTY OF _____

On this the ____ day of _____, 20____, before me, the undersigned Notary Public of the State of Florida, personally appeared _____
(name of individual who appeared before notary) whose name(s) is/are subscribed to the within instrument, he/she/they acknowledge that he/she/they executed it.

Notary Public, State of Florida

My commission expires:

___ Personally known to me, or
___ Produced identification _____
(Type of I.D. produced)
___ DID take an oath, or ___ DID NOT take an oath.

Further, I understand that I am required to notify SBBC of any changes to the information contained herein and that I am required to register for each new principal on whose behalf I lobby.

Signature of Lobbyist: _____ Date: _____

CHECK LIST (Please initial)

___ Engagement or Authorization Letter Attached ___/Initial.

Return completed form to: Public Relations & Governmental Affairs, 600 SE Third Avenue, 2nd floor, Fort Lauderdale, FL 33301