

June 12, 2001
Re: IO-01-92

You inquired whether you must register as a lobbyist on behalf of a client who is seeking inclusion into the county's 10 year solid waste management plan. You stated your belief that this process was primarily administrative in nature, although legislation amending the plan would be required to permit your client's business concept to proceed further.

The ethics commission has concluded that you, or other lawyers in your firm, are required to register as a lobbyist on behalf of your client, under §2-101(q)(1) of the Public Ethics Law. You have communicated and will continue to communicate with employees of the legislative branch of the government "for the purpose of influencing. . . legislative action", and you will receive \$100 or more in compensation for these services. This conclusion is in keeping with the requirement that lawyers who represent clients in trying to modify the general development plan are also required to register as lobbyists.

For these reasons, the ethics commission advises you to register as a lobbyist on behalf of your client prior to engaging in any further communications with members of the county council or other employees of the legislative branch. I have enclosed the necessary registration forms for your convenience.

Sincerely,

Betsy K. Dawson
Executive Director