

September 16, 2019

## Board determines that an individual engaged in unregistered lobbying and assesses a \$25,000 fine

At its September 13, 2019 meeting, in Case No. 19018.C.1, the Board met with Roberto Caldero and his attorney. The Board had informed Mr. Caldero in May 2019, pursuant to §2-156-245 of the Governmental Ethics Ordinance, that: (i) it had determined, based on documents made available in the media, that there was probable cause to conclude that he had engaged in several acts of unregistered lobbying in 2015, in violation of §2-156-230 of the Governmental Ethics Ordinance; (ii) he had the right to rebut the Board's finding; and (iii) if his attempt was unsuccessful, the Board could determine that he violated the Ordinance and make public his name, violation, and the sanction imposed.

After this meeting, the Board determined, by a vote of 4-0 (three members absent), that: (i) Mr. Caldero engaged in unregistered lobbying in violation of §2-156-230 of the Ordinance, as he had not rebutted the finding that the facts available to the Board demonstrated he engaged in unregistered lobbying in several attempts to influence a City elected official on behalf of a client with respect to taking City action in both a legislative matter and an administrative matter; and (ii) pursuant to its authority set forth in §2-156-265(b)(3) of the Ordinance, the Board fined Mr. Caldero Twenty-five Thousand (\$25,000) Dollars for the violation.

At the Board's October 2019, it will consider further action against the person who retained or employed Mr. Caldero, pursuant to §2-156-305 of the Governmental Ethics Ordinance. If that person is determined to have violated the Ordinance by retaining or employing a person (Mr. Caldero) who failed to register as a lobbyist as required by the Governmental Ethics Ordinance, that person will be subject to a fine between \$500 and \$2,000, the maximum fine for this violation.