



CHIEF FINANCIAL OFFICER  
**JIMMY PATRONIS**  
STATE OF FLORIDA

May 2, 2018

Mr. Barry Gilway, President, CEO and Executive Director  
Citizens Property Insurance Corporation  
301 W. Bay Street  
Jacksonville, FL 32202

Dear Mr. Gilway:

As Florida's Chief Financial Officer and a member of the Financial Services Commission, I believe that transparency should be a key component to any organization. Currently, lobbyists are not statutorily required to disclose their efforts on behalf of clients and private interests they represent before Citizens Property Insurance Corporation. Florida's state-backed insurer should be subject to the same rules as state agencies and organizations such as water management districts.

Transparency is one of the best ways we can ensure accountability. It should be crystal clear who is interested in influencing Citizens policy changes or securing contracts with the Corporation. The Citizens internal Code of Ethics should address lobbying activities. Considering the lack of a statutory requirement, I am requesting Citizens attend the next meeting of the Governor and Cabinet to discuss the Corporation's plan of action and timeline to correct this shortcoming.

Citizens should examine its internal Code of Ethics and consider options such as publicly documenting entities that lobby Citizens. These options would be a proactive approach while awaiting the next legislative session to address this statutorily.

A public entity that provides insurance to more than 444,000 policyholders in Florida, and the potential financial impact that Citizens has for all Floridians' insurance policies, should ensure all lobbying activities are conducted in the sunshine.

Regards,

A handwritten signature in blue ink that reads "Jimmy Patronis".

Jimmy Patronis  
Chief Financial Officer

c: Christopher B. Gardner, Chairman

<b>Policy Title:</b>	<b>Lobbyist Registration Required</b>	<b>Policy Number:</b>	<b>103</b>
<b>Effective Date:</b>	<b>September 1, 2018</b>	<b>Policy Administrator:</b>	<b>Ethics and Compliance</b>

## I. Purpose/Scope

The purpose of the policy is to increase transparency by requiring lobbyist registration to enable Citizens to provide public access to the list of registered lobbyists.

## II. Policy

Any Lobbyist seeking to lobby Citizens must register with Citizens before communicating or contacting a member of the Citizens Board of Governors or an employee of Citizens, outside of a presentation on the record at a publicly noticed meeting. Employees and board members should refrain from responding to overtures by Lobbyists attempting to lobby Citizens until their registration is complete.

## III. Procedure

A Lobbyist wishing to lobby Citizens must complete an online registration which will be valid for one year. The registration will be made available to the public in a database housed on Citizens external website.

The registration shall include the following information provided under oath:

1. Name and business address of the Lobbyist;
2. Name and business address of each principal represented;
3. Statement signed by each principal or principal's representative stating that the lobbyist is authorized to represent the principal;
4. The main business of each principal;
5. The existence of any direct or indirect business association, partnership, or financial relationship with any board member or employee of Citizens and the Lobbyist.

## IV. Failure to Register

Upon receipt of a signed complaint alleging that a Lobbyist has lobbied Citizens without properly registering, the Office of the Inspector General shall investigate and make a written report. If the Inspector General finds that there has been a knowing violation of this policy, Citizens shall take appropriate action to avoid future non-compliance. Such action may include exclusion of the Lobbyist or principal from the procurement process for up to one year, and/or the exclusion of the Lobbyist from registration and lobbying for a period of up to one year.

## V. Definitions

**Lobbies or Lobbying** means seeking, on behalf of another person, to influence Citizens with respect to a decision of Citizens in the area of policy or procurement or an attempt to obtain the goodwill of a Citizens official or employee.

**Lobbyist** means a person who is employed and receives payment, or who contracts for economic consideration for the purpose of lobbying, or a person who is principally employed for governmental affairs by another person or entity to lobby on behalf of that person or entity. "Lobbyist" does not include a person who is:

1. An attorney, agent, adjuster, or any person in active representation of a client with respect to an insurance claim or a judicial proceeding who contacts Citizens with regard to that insurance claim or judicial proceeding.
2. An employee of an agency or legislative or judicial branch acting in the normal course of his or her duties.
3. A confidential informant who is providing or wishes to provide, confidential information to be used for law enforcement purposes.
4. A person who lobbies to procure a contract pursuant to Chapter 287 which contract is less than the threshold for CATEGORY ONE as provided in F.S. s. 287.017. (\$20,000)

**Policy** means a plan or course of action which is applicable to a class of persons, proceedings, or other matters and which is designed to influence or determine the subsequent decisions and actions of Citizens. It does not include the adjudication or determination of any right duties or obligations of a person made on a case by case basis such as would be involved in the evaluation of an insurance policy issuance or claim, or investigation of a person.

**Principal** means the person, firm, corporation, or other entity which has employed or retained a lobbyist.

**Procurement** means the purchase or acquisition of any property, interest in property, or services by Citizens.

## VI. Authority

Citizens Plan of Operation, Section 7(A)(7)

## VII. History

<u>Action</u>	<u>Date</u>
Created	6-20-2018
Revised	

## VIII. Approval

Policy Title	Lobbyist Registration Required
Approved by	Citizens' Board of Governors at its meeting on June 20, 2018.

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