

FILE 2827 — December 5, 2025

## **LOBBYING RESTRICTIONS**

### **APPLICATION OF THE IN-OFFICE LOBBYING BAN TO NEWLY-APPOINTED SCHOOL BOARD MEMBER**

*To: Annie "Kate" Wallace, School Board Member (Polk County)*

#### **SUMMARY:**

Pursuant to Article II, Section 8(f)(2), Florida Constitution, a school board member may not lobby for compensation before local government entities on behalf of an employer by whom she is principally employed for governmental affairs. Guidance is offered whether work performed in another position for the same employer would be compliant with Article II, Section 8(f)(2), Florida Constitution. Referenced are CEO 19-12 and CEO 25-3.

#### **QUESTION 1:**

Would a newly appointed school board member be in violation of Article II, Section 8(f)(2), Florida Constitution, were she to continue working as the Director of State Government Affairs for a private company?

This question is answered as follows.

In your inquiry, you indicate the Governor recently appointed you to fill a vacancy on the Polk County School Board. You note you were sworn into office on November 18, 2025. In your inquiry, which preceded taking your oath of office, you ask whether you may retain your position

as Director of State Government Affairs for Charter Communications ("Charter") while also serving as a member of the Polk County School Board.

You state Charter is a cable, internet, video, and phone company serving approximately 3 million customers in the state of Florida. In your role with Charter, you explain that you serve as its liaison to Florida county and municipal governments within an assigned territory. You state you do not lobby state agencies, you are not a registered lobbyist, and you have never needed to register as a lobbyist for local-level work. You describe your job responsibilities as follows:

- 50% Public liaison to local governments: handle equipment repair requests; coordinate disaster restoration with Emergency Operations Centers; answer constituent inquiries; inform officials of Charter initiatives (ex: affordable internet for low income families, free WiFi hotspots during natural disasters, Spectrum's nonprofit grant initiatives); represent company at community events, conferences, civic boards, and speaking engagements.
- 25% Internal coordination across departments to advance Charter priorities.
- 10% Help plan and manage the production and planning of In Focus Florida, a weekly Sunday public affairs show featuring elected officials and thought leaders
- 10% Monitor city/county agendas for Charter interests; other administrative and non-lobbying duties as assigned.
- 5% total (2.5% each) Provide feedback to local governments on ordinances affecting Charter; discuss Right-of-Way permitting questions or concerns with local government staff.

In subsequent communications with Commission staff, you confirmed the final 5 percent you listed in your description of your duties for Charter involves attempting to influence local governments, including attempts to change their policies and ordinances concerning right-of-way permitting to conform with Charter's interpretation of related state statutes. According to you, these communications about the local policies and ordinances do not arise from any contractual obligation that Charter has with the local governments.

On these facts, you ask whether the performance of your assigned duties with Charter would violate the In-Office Lobbying Ban found in Article II, Section 8(f)(2), Florida Constitution. To analyze this specific question, we first note that any penal statute or constitutional provision must be strictly construed and any doubts as to the meaning of its terms must be construed must be construed favorably toward a potential respondent. CEO 19-12 (citing City of Miami Beach v. Galbut, 626 So. 2d 192, 194 (Fla. 1993)). With this principle in mind, turning to the language of the In-Office Lobbying Ban, Article II, Section 8(f)(2), Florida Constitution, the prohibition states:

A public officer shall not lobby for compensation on issues of policy, appropriations, or procurement before the federal government, the legislature, any state government body or agency, or any political subdivision of this state, during his or her term of office.

To properly analyze this prohibition's applicability to you, we must determine whether you are a "public officer" subject to the ban and whether the duties you have described in your inquiry qualify under the prohibition as "lobbying for compensation."

The term "public officer" for purposes of the In-Office Lobbying Ban is defined in Article II, Section 8(f)(1), Florida Constitution. This provision states:

For purposes of this subsection, the term "public officer" means a statewide elected officer, a member of the legislature, a county commissioner, a county officer pursuant to Article VIII or county charter, a school board member, a superintendent of schools, an elected municipal officer, an elected special district officer in a special district with ad valorem taxing authority, or a person serving as a secretary, an executive director, or other agency head of a department of the executive branch of state government.

Given that you were recently appointed to serve on the Polk County School Board, you are a "school board member," which is included in the definition of "public officer." Therefore, now

that you are sworn in as a school board member, it appears the In-Office Lobbying Ban is applicable to you.

The question then becomes whether your current job duties for Charter amount to "lobbying for compensation." Several of the definitions in Article II, Section 8(f)(2), Florida Constitution, are defined in Section 112.3121, Florida Statutes, which is its implementing legislation. As it pertains to conduct directed at political subdivisions, the definition of "lobby" is:

to influence or attempt to influence an action or decision through oral, written, or electronic communication and, with respect to...[a] political subdivision, is limited to influencing legislative actions or other discretionary decisions, but does not include administrative actions.

§ 112.3121(11)(a)3., Fla. Stat. And the phrase "lobby for compensation," is defined Section 112.3121(12)(a), Florida Statutes, as follows:

"Lobby for compensation" means being employed or contracting for compensation, for the purpose of lobbying, and includes being principally employed for governmental affairs to lobby on behalf of a person or governmental entity.

However, crucially, besides defining what will constitute "lobbying for compensation"—which will implicate the Constitutional prohibition—the implementing legislation also enumerates what is excluded from the definition of "lobby for compensation." Among the conduct that does not constitute "lobbying for compensation" is:

2. A public or private employee, including an officer of a private business, nonprofit entity, or governmental entity, acting in the normal course of his or her duties, *unless he or she is principally employed for governmental affairs.*
3. Advice or services to a governmental entity pursuant to a contractual obligation with the governmental entity.

§ 112.3121(12)(b)2.-3., Fla. Stat. (emphasis added). It bears repeating that, considering these definitions, even if one qualifies as a "public officer" for purposes of in Article II, Section 8(f)(2),

and even if they engage in "lobbying," an analysis under the Constitutional prohibition will not be complete without examining whether any exclusions to the definition of "lobby for compensation" are available, such as the exclusion for privately acting in the normal course of one's duties when not principally employed for governmental affairs.

The term "principally employed for governmental affairs" is defined in Section 112.3121(15), Florida Statutes, as follows:

"Principally employed for governmental affairs" means that the principal or most significant responsibility of the employee is to oversee the employer's various relationships with governmental entities or representing the employer in its contacts with governmental entities.

Applying these definitions to your job responsibilities at Charter, it is clear that your current role requires some "lobbying for compensation." You describe the category of responsibilities that accounts for 5 percent of your time as making contact with local governments to influence their policies and ordinances in the hopes that they might conform with Charter's interpretation of state statutes.<sup>1</sup> It appears that the other job duties (the remaining 95 percent), as you describe them, are

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<sup>1</sup> Your description of that category of your responsibilities seems to consist mostly of tasks that would constitute lobbying, though not all of them are. We distinguish providing feedback generally to a local government on an ordinance from raising arguments about how a local government has treated Charter on a specific permit or permit application. Providing general, policy-based feedback designed to influence or change an ordinance will constitute prohibited "lobbying for compensation" under the Constitutional prohibition. However, engaging in conduct regarding the treatment of a specific application or permit appears exempt from the definition of "lobby for compensation." This is because, exempted from the definition of "lobby," as it pertains to political subdivisions, are "administrative actions," the definition of which includes "any action or decision on a . . . permit . . . [and] any decision subject to judicial review by petition for writ of certiorari or as otherwise prescribed by general law . . . ." § 112.3121(1), Fla. Stat. In telephonic conversations with Commission staff, you indicated that one of your responsibilities, which you would put in the 5 percent category, involves informing local government entities when their treatment of a specific Charter permit or application is not compliant with state law. This appears to fall within the definition of "administrative actions" as it involves a local government's action or decision on a particular permit, and may even be subject to judicial review. Such conduct, when

not lobbying. But the fact remains that five percent of your responsibilities pertain to lobbying for compensation, and this is sufficient to implicate the prohibition in Article II, Section 8(h)(2) unless an exemption applies.

Regarding those exemptions, according to Section 112.3121(12)(b), an employee may lobby when acting in the normal course of his or her duties so long as that employee is not also principally employed for governmental affairs. We applied this exception in CEO 25-3, where the mayor of a municipality was lobbying the federal government on behalf of his employer, but his lobbying responsibilities were not the primary focus of his employment and occurred sparingly, requiring only a few days of work per year. The principal focus of his employment was not lobbying, but fundraising, as his job primarily involved soliciting donations from private donors. We found, under those circumstances, that the mayor's activities fell within the exemption in Section 112.3121(12)(b) and did not constitute "lobbying for compensation" for purposes of the Constitutional prohibition, given that any lobbying was done in the normal course of his duties and was not the task for which he was principally employed.

In your current role at Charter, however, it appears that you are principally employed for governmental affairs. Consistent with your job title—Director of State Government Affairs—you indicate your most significant responsibility (50 percent) is being a public liaison to local governments and managing Charter's relationship with those local governments. You have noted that this involves handling equipment repair requests, coordinating disaster restoration with emergency operations centers, and informing officials of Charter initiatives such as affordable internet for low-income families and free Wi-Fi hotspots during natural disasters. While these

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it is specifically aligned with a particular permit or application, will not constitute lobbying that is subject to the In-Office Lobbying Ban.

activities appear not to involve lobbying, they demonstrate you are principally employed for governmental affairs, which makes you ineligible for the exemption in Section 112.3121(12)(b).

As noted earlier, another exemption to the definition of "lobbying for compensation," found in Section 112.3121(12)(c), relates to rendering advice or services due to some contractual obligation to the local governments. As you informed Commission staff, however, your communications with the local governments do not arise from any contractual obligation with those local governments.

Therefore, because 5 percent of your job responsibilities consists of lobbying for compensation, and because you are also principally employed for governmental affairs, performing those lobbying duties (or any other act that would meet the definition of lobbying for compensation) is prohibited by the In-Office Lobbying Ban. If you are able to obtain a change in your job duties with Charter such that the 5 percent of your responsibilities involving lobbying are shifted to another employee while you are a Member of the Polk County School Board, then you would be in compliance with the requirement. To be clear, you may still perform the other job responsibilities you listed, which do not constitute "lobbying for compensation."<sup>2</sup>

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<sup>2</sup> You asked Commission staff in a telephonic conversation whether you can be present in a meeting where other employees from Charter may be actively lobbying local government officials. You explain that being present would provide you with knowledge of what was being said in the meeting and the concerns or questions that the local government officials may have, which would then would help you perform better in your government affairs-related duties. As previously discussed, we must strictly construe penal statutes and constitutional provisions. Applying that principle here, since the definition of lobby in Section 112.3121(11) includes only influencing or attempting to influence the local government legislative action or decision "through oral, written, or electronic communication," it does not seem that merely being present at a meeting meets this definition, as the influence you would exert with your silent presence would not be making use of any "oral, written, or electronic communication." The Legislature could have written the definition of "lobby" in Section 112.3121(11) to include one's mere presence at a meeting, as it did for the post-office representation bans found in Section 112.313(9), Florida Statutes. See § 112.312(22) (*defining* "represent" to include "actual physical attendance on behalf of a client in an agency proceeding.") We must assume the Legislature's decision not to include such conduct in the

Your question is answered accordingly.<sup>3</sup>

**QUESTION 2:**

Would the prohibition in Article II, Section 8(f)(2), Florida Constitution, apply were a newly-appointed school board member to accept a new role with her employer that does not involve lobbying local governments?

Under the facts presented in the inquiry, this question is answered in the negative.

You have informed Commission staff that Charter has indicated it may be able to move you to a different role, and you have asked if working in this specific role would violate the In-Office Lobbying Ban. In this role, you state you would serve as Charter's Senior Manager for Government & Community. Regarding this position, you have provided a job description stating the responsibilities involve developing and coordinating government focused community activities, coordinating and developing communication materials, enhancing the company's public image, and promoting company visibility.

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definition of "lobby" was intentional, and we therefore cannot interpret the "lobby" in Section 112.3121 to include silent attendance in a meeting. We caution you, however, that anything you might say may very well be construed as advancing the lobbying messages of others in the meeting, potentially putting you in jeopardy of violating the In-Office Lobbying Ban.

<sup>3</sup> We note that the In-Office Lobbying Ban is the subject of ongoing litigation, during the pendency of which the Ban will continue to apply to who are subject to its enforcement except the named plaintiff who had standing to challenge the Ban. See Garcia et al. v. Stillman et al. USCA Case No. 23-12663 (11th Circuit Court of Appeals). We advise that the applicability of this opinion may depend on the outcome of that case, which is, as of this date, not decided.



Upon a review of the job description that you have provided, it does not appear that serving as Senior Manager for Government & Community would be prohibited by Article II, Section 8(f)2., Florida Constitution. This is because none of your job responsibilities in this role would fall under the definition of "lobbying for compensation" as the position does not require you to contact government entities to "lobby." Specifically, there is nothing in the job description indicating you would have any duties involving influencing local government legislative actions or other discretionary decisions. As such, were you to simultaneously serve on the Polk County School Board while performing this specific role at Charter, it does not appear you will violate Article II, Section 8(f)2., Florida Constitution.

Your question is answered accordingly.

cc: Annie "Kate" Wallace

LMF/sjz/ks

**Zuilkowski, Steven**

File 2827

**From:** Steverson, Kathryn  
**Sent:** Friday, November 14, 2025 12:14 PM  
**To:** Naomi, Amelia  
**Cc:** Zuilkowski, Steven  
**Subject:** FW: Request for legal opinion on school board appointment eligibility - Time sensitive

Amelia,

Please see below request assigned to you. This is Time Sensitive.

Thank you, 😊

Kathryn Steverson  
*Assistant to the Executive Director*

*Florida Commission on Ethics  
P.O. Drawer 15709  
Tallahassee, FL 32317-5709  
(850) 488-7864  
(850) 488-3077 Fax  
[www.ethics.state.fl.us](http://www.ethics.state.fl.us)*

**Physical address:**  
325 John Knox Road  
Building E, Suite 200  
Tallahassee, FL 32303

**From:** Kate Wallace <katewallaceuf@gmail.com>  
**Sent:** Thursday, November 13, 2025 3:47 PM  
**To:** Steverson, Kathryn <STEVERSON.KATHRYN@leg.state.fl.us>  
**Subject:** Re: Request for legal opinion on school board appointment eligibility - Time sensitive

Thank you, Kathryn.

Sincerely,  
Kate (a fellow Kathryn)

Sent from my iPhone

On Nov 13, 2025, at 3:27 PM, Steverson, Kathryn <STEVERSON.KATHRYN@leg.state.fl.us> wrote:

Good afternoon, Ms. Wallace –

The Commission has received your ethics request and it has been assigned to one of our attorneys. He or she will contact you directly.

Thank you,

Kathryn Steverson  
*Assistant to the Executive Director*

*Florida Commission on Ethics  
P.O. Drawer 15709  
Tallahassee, FL 32317-5709  
(850) 488-7864  
(850) 488-3077 Fax  
[www.ethics.state.fl.us](http://www.ethics.state.fl.us)*

**Physical address:**  
325 John Knox Road  
Building E, Suite 200  
Tallahassee, FL 32303

**From:** Kate Wallace <[katewallaceuf@gmail.com](mailto:katewallaceuf@gmail.com)>  
**Sent:** Thursday, November 13, 2025 2:41 PM  
**To:** Stillman, Kerrie <[STILLMAN.KERRIE@leg.state.fl.us](mailto:STILLMAN.KERRIE@leg.state.fl.us)>  
**Cc:** Kate Wallace <[katewallaceuf@gmail.com](mailto:katewallaceuf@gmail.com)>  
**Subject:** Request for legal opinion on school board appointment eligibility - Time sensitive

Dear Kerrie and the Florida Commission on Ethics:

Gov. Ron DeSantis appointed me to an interim term on the Polk County School Board, announced Nov. 7. I am due to be sworn in Nov. 18, 2025 and seek your opinion on whether I may retain my position as Director of State Government Affairs at Charter Communications under Florida law. If possible, please respond as soon as possible and preferably prior to Nov. 18.

**SITUATION:** Charter Communications, operating as Spectrum, is a cable internet, video and phone company serving approximately 3 million customers in the state of Florida. I serve as a liaison for Charter to an assigned territory of Florida county governments and their municipalities. I do not lobby state agencies, am not a registered lobbyist, and have never needed to register for local-level work. The Governor's office, fully aware of my job and my duties, felt I was not in conflict with the law and chose to appoint me. However, my employer seeks clarity on other potential conflicts. I also request guidance on whether there is any material distinction or exception because I was appointed and not elected to the position.

**JOB RESPONSIBILITIES (approximate percentages of time):**

1. **50%:** Public liaison to local governments: handle equipment repair requests; coordinate disaster restoration with Emergency Operations Centers; answer constituent inquiries; inform officials of Charter initiatives (ex: affordable internet for low income families, free WiFi hotspots during natural disasters, Spectrum's nonprofit grant initiatives); represent company at community events, conferences, civic boards, and speaking engagements. .
2. **25%:** Internal coordination across departments to advance Charter priorities.
3. **10%:** Help plan and manage the production and planning of In Focus Florida, a weekly Sunday public affairs show featuring elected officials and thought leaders
4. **10%:** Monitor city/county agendas for Charter interests; other administrative and non-lobbying duties as assigned.
5. **5% total (2.5% each):** Provide feedback to local governments on ordinances affecting Charter; discuss Right-of-Way permitting questions or concerns with local government staff.

Bottom line, I spend a tiny percentage of my time engaged in lobbying or administrative decision conversations with local governments. That said, I please advise on whether my position would legally disqualify me from serving as a school board member.

If you have any questions for me, do not hesitate to contact me. Thank you for your prompt attention to this matter.

Sincerely,  
Annie "Kate" Wallace  
904-304-9577 - cell

## Steverson, Kathryn

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**From:** Naomi, Amelia  
**Sent:** Monday, November 17, 2025 9:13 AM  
**To:** Steverson, Kathryn  
**Subject:** FW: your ethics inquiry

**From:** Kate Wallace <katewallaceuf@gmail.com>  
**Sent:** Friday, November 14, 2025 3:28 PM  
**To:** Naomi, Amelia <NAOMI.AMELIA@leg.state.fl.us>  
**Subject:** Re: your ethics inquiry

Not at present, but it could. I believe we have bid on things before.

I've personally thought about this and would of course recuse myself from any votes or decisions regarding any telecommunications services we proffer. These votes as I've observed are not common since they are long term contracts.

Sent from my iPhone

On Nov 14, 2025, at 3:20 PM, Naomi, Amelia <NAOMI.AMELIA@leg.state.fl.us> wrote:

Thank you!

Also, one quick follow-up question: does the Polk County School District do any business with Charter?

Best,  
Amelia

**From:** Kate Wallace <katewallaceuf@gmail.com>  
**Sent:** Friday, November 14, 2025 2:56 PM  
**To:** Naomi, Amelia <NAOMI.AMELIA@leg.state.fl.us>  
**Subject:** Re: your ethics inquiry

You got it.

Please note this is a national description for the job that people hold across our 41 state footprint. The dynamics are different from state to state. My personal description of how I spend provided in my formal request my paints a more detailed picture.

Thank you again. Reach out any time for questions.

Sincerely,  
Kate Wallace

Sent from my iPhone

On Nov 14, 2025, at 2:07 PM, Naomi, Amelia  
<NAOMI.AMELIA@leg.state.fl.us> wrote:

Sure, you can send that to me! And yes, I will work on getting this to you as soon as possible.

**From:** Kate Wallace <katewallaceuf@gmail.com>  
**Sent:** Friday, November 14, 2025 2:06 PM  
**To:** Naomi, Amelia <NAOMI.AMELIA@leg.state.fl.us>  
**Cc:** Steverson, Kathryn <STEVERSON.KATHRYN@leg.state.fl.us>  
**Subject:** Re: your ethics inquiry

Thank you Amelia.

I also have a general description of my job from my company. May I send that to you?

Also we have made temporary arrangements for me to be good on Nov 18 but the sooner we have the opinion the better.

Thanks again.  
Kate

Sent from my iPhone

On Nov 14, 2025, at 12:19 PM, Naomi, Amelia  
<NAOMI.AMELIA@leg.state.fl.us> wrote:

Dear Ms. Wallace,

I hope you are well. I am the attorney you spoke with yesterday on the phone. I have been assigned your ethics letter and I will let you know if I have any further follow-up questions!

Best,  
*Amelia L. Naomi*  
Attorney

Florida Commission on Ethics  
[NAOMI.AMELIA@leg.state.fl.us](mailto:NAOMI.AMELIA@leg.state.fl.us)  
Telephone: 850-488-7864 | Fax: 850-488-3077

## Steverson, Kathryn

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**From:** Naomi, Amelia  
**Sent:** Monday, November 17, 2025 9:13 AM  
**To:** Steverson, Kathryn  
**Subject:** FW: your ethics inquiry  
**Attachments:** Dir State Government Affairs - PGA720.docx

**From:** Kate Wallace <katewallaceuf@gmail.com>  
**Sent:** Friday, November 14, 2025 2:56 PM  
**To:** Naomi, Amelia <NAOMI.AMELIA@leg.state.fl.us>  
**Subject:** Re: your ethics inquiry

You got it.

Please note this is a national description for the job that people hold across our 41 state footprint. The dynamics are different from state to state. My personal description of how I spend provided in my formal request my paints a more detailed picture.

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**Cc:** Steverson, Kathryn <STEVERSON.KATHRYN@leg.state.fl.us>  
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Kate

Sent from my iPhone

On Nov 14, 2025, at 12:19 PM, Naomi, Amelia  
<[NAOMI.AMELIA@leg.state.fl.us](mailto:NAOMI.AMELIA@leg.state.fl.us)> wrote:

Dear Ms. Wallace,

I hope you are well. I am the attorney you spoke with yesterday on the phone. I have been assigned your ethics letter and I will let you know if I have any further follow-up questions!

Best,

***Amelia L. Naomi***

Attorney

Florida Commission on Ethics

[NAOMI.AMELIA@leg.state.fl.us](mailto:NAOMI.AMELIA@leg.state.fl.us)

Telephone: 850-488-7864 | Fax: 850-488-3077

# Dir, State Government Affairs

Job Code: PGA720



## JOB SUMMARY

The Director of Government Affairs will be responsible for developing, coordinating and implementing government affairs strategies and activities that advance the company's interests primarily at the state and local level. The job may include representing the company before state and local governments and administrative agencies, franchising and procurement, community affairs, as well as strategically planning, managing and executing other activities and events that advance the company's overall objectives. The following offers more detailed descriptions of the kinds of responsibilities associated with the position.

## MAJOR DUTIES AND RESPONSIBILITIES

Contributes to and support Charter's government affairs and public policy strategies and tactics.

Develops, builds and expands relationships with public officials and other influential policy makers at the federal, state and local level.

Works collaboratively with supervisors, peers and outside consultants to develop and grow grass roots and third-party support for the benefit of the company and its interests.

Develops budgets and effectively plan and execute initiatives to grow the company's image within the communities managed.

Assists in the development and management of the company's political contribution strategies, where permitted under applicable law.

Represents the company before external constituencies, including elected officials and other state and local government agencies, commissions and authorities, and organize and represent the company at community events and other external functions.

Drafts, analyzes and/or presents legislation, franchise/contract language, amendments, and testimony as necessary and perform legislative and regulatory advocacy.

Manages outside counsel, consultants or lobbyists as necessary.

Manages interactions with local governments on permitting, right-of-way and other local concerns.

Reviews, interprets, and communicates terms and conditions of franchises, franchise-related agreements, and other contracts for implementation to ensure compliance with legal and regulatory obligations.

Responds to and monitors resolution of escalated complaints from local, state or federal government authorities.

Manages franchise renewal and franchise transfer efforts for assigned franchises consistent with the strategies and policies for the company.

Prepares franchise renewal applications and supporting data for renewal negotiations, develops renewal strategy and participates in franchise renewal negotiations with municipalities.

Helps identify government-related business opportunities and facilitate discussions with business and assist them in developing responses for government procurement.

## **REQUIRED QUALIFICATIONS**

### **Required Skills/Abilities and Knowledge**

Ability to communicate orally and in writing in a clear and straightforward manner

Ability to handle multiple projects and tasks

Ability to make decisions and solve problems while working under pressure

Ability to read, analyze, and interpret legislation, regulation, contracts, franchises and legal documents

Ability to use personal computer and software applications (i.e. word processing, spreadsheet, presentations, etc.)

Ability to work independently, but also collaborate effectively with colleagues, peers and other internal and external constituencies

Ability to exercise of independent judgment and discretion in matters of significance and operate with integrity and within company values; maintain high standards for ethical practice

Knowledge of cable, telecommunications and broadband products, services and regulation preferred

Background in law or public policy required

Understanding of state and local government

Valid driver's license with satisfactory driving record within company standards and auto insurance

### **Required Education**

Bachelor's degree in a related field or equivalent experience

### **Required Related Work Experience and Number of Years**

Political/government relations experience – 4-5

## **PREFERRED QUALIFICATIONS**

### **Preferred Skills/Abilities and Knowledge**

### **Preferred Education**

### **Preferred Related Work Experience and Number of Years**

Advocacy, lobbying and negotiation experience - 8-10

Political/government relations experience - 8-10

Related experience in the cable industry, government, public policy or legislative arenas - 8-10

## **WORKING CONDITIONS**

Normal office conditions

Frequent travel required

Able to work nights and weekends, variable schedule(s) as necessary

Vision ability close vision, peripheral vision, and ability to adjust focus

## **PHYSICAL AND MENTAL REQUIREMENTS**

### **Physical Requirements**

### **Mental Requirements**

## **EOE**

*Charter Communications is an Equal Opportunity Employer - Minority/Female/Veteran/Disability*

**Created or Revised Date**

6/3/25

**Steverson, Kathryn**

File 2827

**From:** Naomi, Amelia  
**Sent:** Wednesday, November 19, 2025 4:59 PM  
**To:** Steverson, Kathryn  
**Subject:** FW: Following up

This informal will be turned into a formal for the dec 5 meeting 😊

**From:** Kate Wallace <katewallaceuf@gmail.com>  
**Sent:** Wednesday, November 19, 2025 9:07 AM  
**To:** Naomi, Amelia <NAOMI.AMELIA@leg.state.fl.us>  
**Subject:** Re: Following up

Thanks! I called and left a message for him with Jeremy saying I am ready to proceed and to call me back with next steps.

Again, appreciate all of you and your team's help.

Kate

On Wed, Nov 19, 2025 at 8:53 AM Naomi, Amelia <NAOMI.AMELIA@leg.state.fl.us> wrote:

Hello! His name is Steve Zuilkowski.

-----Original Message-----

**From:** Kate Wallace <katewallaceuf@gmail.com>  
**Sent:** Wednesday, November 19, 2025 7:45 AM  
**To:** Naomi, Amelia <NAOMI.AMELIA@leg.state.fl.us>  
**Subject:** Following up

Amelia:

What was the name of the gentleman I spoke with on the phone with you yesterday? I wanted to make sure to know to ask for him when I call this morning.

Thank you,  
Kate

Sent from my iPhone

--  
Kate Wallace  
(904) 304-9577

## Zuilkowski, Steven

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**From:** Naomi, Amelia  
**Sent:** Thursday, November 20, 2025 1:16 PM  
**To:** Zuilkowski, Steven  
**Subject:** FW: Following up  
**Attachments:** Sr Mgr Government Community - NEW ROLE.pdf

**From:** Kate Wallace <katewallaceuf@gmail.com>  
**Sent:** Thursday, November 20, 2025 1:13 PM  
**To:** Naomi, Amelia <NAOMI.AMELIA@leg.state.fl.us>  
**Subject:** Re: Following up

Naomi:

Here are my answers to your questions. Also, I will not be retaining my own legal counsel. However if you have any other questions for me as you all form your opinion, please let me know.

1. **As we discussed on the phone, is it possible for you to continue in your current role without also doing the lobbying aspect of your responsibilities?** *This will depend on the findings of the Commission's opinion and ruling. If the commission rules I can do all or most aspects of my current role, I would be able to continue. If it finds I cannot, I would not be able to stay in my current role.*
2. **As we discussed on the phone, Charter may be able to move you to a different role. Can you send a list of the job duties/responsibilities for that role?** *Attached.*
3. **Are your government-facing job duties performed pursuant to any contractual obligations Charter has with these governmental entities? Or, as you described on the phone, do you only have discussions with governmental entities that have contracts with Charter as a courtesy when there is an issue?** *There is not a contractual obligation for me to service any accounts held by governmental entities; however, Charter does ask its government affairs team to provide courtesy support during certain customer service escalation situations. Per my answer to question 1, this is an example of something I could, with Charter's permission, assign to another colleague if the commission felt it was not allowable.*
4. **Would it be correct to characterize your lobbying efforts as efforts to change or interpret local ordinances to not conflict with Charter's interpretations of state law?** *Yes, these conversations consist of questioning or challenging their approach to submitted permitting applications or pointing out provisions or practices Charter believes is afoul of state law. The rare occasions in which I engage in lobbying activity are when a city has proposed a new ordinance introducing new right-of-way permitting requirements and regulations for all communication services providers that the company believes is afoul of FS 337.401 and other related statutes. When these situations have occurred, my conversation is focused on educating staff and electeds on these matters. As a point of contextual information for the commission's consideration, I have had such interactions with a total of 3 municipalities related to ROW permitting ordinances in my territorial portfolio of 14 counties and 90 cities. So that is how rare these issues come up.*

**From:** Kate Wallace <katewallaceuf@gmail.com>  
**Sent:** Wednesday, November 19, 2025 9:07 AM  
**To:** Naomi, Amelia <NAOMI.AMELIA@leg.state.fl.us>  
**Subject:** Re: Following up

Thanks! I called and left a message for him with Jeremy saying I am ready to proceed and to call me back with next steps.

Again, appreciate all of you and your team's help.

Kate

On Wed, Nov 19, 2025 at 8:53 AM Naomi, Amelia <NAOMI.AMELIA@leg.state.fl.us> wrote:

Hello! His name is Steve Zuilkowski.

-----Original Message-----

From: Kate Wallace <katewallaceuf@gmail.com>  
Sent: Wednesday, November 19, 2025 7:45 AM  
To: Naomi, Amelia <NAOMI.AMELIA@leg.state.fl.us>  
Subject: Following up

Amelia:

What was the name of the gentleman I spoke with on the phone with you yesterday? I wanted to make sure to know to ask for him when I call this morning.

Thank you,  
Kate

Sent from my iPhone



--

Kate Wallace  
(904) 304-9577

# Sr Mgr, Government & Community

Job Code: PGA620



## JOB SUMMARY

As a Senior Manager of Government and Community Strategy, you will be responsible for developing and executing strategies to enhance the company's image through government and community initiatives. This position will support government affairs functions and include tasks such as event planning and execution, community investment, and strategic use of local programming assets in the region.

## MAJOR DUTIES AND RESPONSIBILITIES

*Actively and consistently support all efforts to simplify and enhance the customer experience.*

Develop, coordinate, and execute government focused community activities across a designated regional area. This includes but not limited to physically setting up for, executing, and breaking down said community activities and events.

Prepare briefing documents, talking points, and messaging frameworks to help support business engagement with external stakeholders

Draft edit, and coordinate communications (including but not limited to presentations, correspondence, and public statements) to ensure consistency and alignment with company messaging.

Provide rapid-response support for emerging policy issues by developing clear and effective communication materials.

Support government affairs objectives by enhancing company's public image in the communities served.

Establish, build and maintain strong relationships and partnerships with community leaders, not-for-profit organizations, key corporate departments and other internal and external third party constituencies.

Work with government affairs to develop a strategic community strategy for the region, including identifying and coordinating community events, sponsorships and charitable contributions designed to support government affairs business objectives and policy initiatives.

Direct strategies and activities that promote company visibility, build a strong company image, and increase public awareness of company's commitment to the communities it serves.

Maximize local programming and other internal assets, including, but not limited to television production capabilities and public service announcements to enhance company's community presence and to meet government affairs related objectives.

Develop and manage departmental budgets related to these objectives for the region.

Track region-wide participation levels for community initiatives; assist in development of collateral materials and work with government affairs counterparts to meet departmental objectives.

Establish operational objectives and work plans and delegate assignments.

Review objectives to determine success.

Involved in developing, modifying and executing company policies that affect immediate operations and may also have company-wide effect.

Other duties as assigned by the Vice President.

## REQUIRED QUALIFICATIONS

### **Required Skills/Abilities and Knowledge**

*Ability to read, write, speak and understand English*

Ability to keep numerous projects on track and on budget

Ability to communicate effectively with all levels in the organization

Ability to think strategically and anticipate future trends, needs and expectations

Effective written, verbal and presentation skills

Proven success cultivating and maintaining positive relationships with external constituencies, including community partners, government officials and other government and quasi-governmental organizations  
Proven project management experience, particularly with leading cross-functional teams  
Must have exceptional attention to detail and a proven ability to follow-through items to completion  
Demonstrated results in developing and implementing successful programs and campaigns and executing events  
Proficiency in Microsoft Office tools (Word, Power Point, Outlook, Publishing, etc.)

**Required Education**

Bachelor's degree or equivalent education

**Required Related Work Experience and Number of Years**

Government, public or community development - 10+  
Significant community or government affairs experience

**PREFERRED QUALIFICATIONS**

**Preferred Skills/Abilities and Knowledge**

Personnel, procurement and budget management experience

**Preferred Education**

**Preferred Related Work Experience and Number of Years**

**WORKING CONDITIONS**

Office environment

**PHYSICAL AND MENTAL REQUIREMENTS**

**Physical Requirements**

Ability to lift and carry up to 50 pounds

## **Mental Requirements**

EOE

*Charter Communications is an Equal Opportunity Employer - Minority/Female/Veteran/Disability*

Created or Revised Date

07/06/2017