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**Commission on Ethics &
Public Trust
Miami-Dade County**

Memorandum

To: Miriam Ramos, Deputy General Council
Miami-Dade County Commission on
Ethics and Public Trust

Date: January 11, 2012

Cc: Michael Murawski, Advocate
Office of the Independent Advocate

Victoria Frigo, Staff Attorney
Miami-Dade County Commission on
Ethics and Public Trust

From: Kennedy Rosario, Investigator OIA 

Re: K12-008 Cross reference INQ 11-104

On June 28, 2011 COE Staff Attorney Victoria Frigo, via correspondence, advised Pilar D. Cueto as President of the ELICUET CORPORATION the provisos that would govern her company entering into a contract with Miami-Dade County.

Ms. Frigo cited Ethics Code Sec. 2-11.1 (c) as allowing her company to do business with all County departments except the Miami-Dade County Seaport (MDCS). This exception is based on the fact that Cueto's spouse, Jose E. Cueto, is employed by MDCS as a Construction Manager III.

In an effort to assure compliance COE Investigator Kennedy Rosario communicated with MDC Chief Seaport Procurement Materials Management Gyselle Pino and MDC ISD Assistant Director Miriam Singer. These inquiries revealed that the Elicuet Corporation is a registered County vendor but has NOT been awarded any Seaport projects as Prime or first-tier sub-contractor/supplier. In addition NO purchase orders have been issued through Seaport procurement.

Base on these findings, it appears Elicuet Corporation is in compliance.