



ETHICS COMMISSIONERS

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Via First Class Mail
And e-mail at dr.prieto@piedroba.com
And at prins@piedroba.com

August 8, 2012

Luis A. Prieto-Porter, Ph.D
Piedroba Consulting Group, LLC
169 E Flagler Street, Suite 1534
Miami, FL 33131

Re: INQ 12-134, Restrictions on doing business as a subcontractor with a prime contractor who has a contract with Miami-Dade County

Dear Dr. Prieto-Porter:

During a phone conversation and in a subsequent email on today's date, you asked about potential ethics conflicts that may be created by your service on the Miami-Dade County Environmental Quality Control Board (EQCB) and your ownership interest and management position with Piedroba Consulting Group, LLC. Piedroba Consulting Group is also owned your son, Luis A. Prieto y Muñoz.

You stated that Piedroba Consulting Group will be providing engineering consultancy services to the Seaport. We understand that DERM is a regulatory agency that does not hire engineering consultants.

Your duties with the EQCB are to hear appeals of decisions made by DERM and to hear all applications to DERM for variances and extensions of time.

Several areas of the Miami-Dade County Ethics Code apply to your circumstances:

- Secs. 2-11.1(c)(3) and (d) prohibit Piedroba Consulting Group from entering into any contracts *directly* with the EQCB or with DERM.
- Sec. 2-11.1(m)(2) prohibits you from appearing before the EQCB on behalf of Piedroba Consulting Group "either directly or through an associate" to make a presentation on behalf of Piedroba Consulting Group with respect to any "license, contract, certificate, ruling, decision, opinion, rate schedule, franchise, or other benefit." Nor are you allowed to receive compensation, directly or indirectly or in any form, for services rendered to Piedroba Consulting Group if the company were to seek some benefit from the EQCB.
- Sec. 2-11.1(v) prohibits you from voting on any matter involving Piedroba Consulting Group that comes before the EQCB if you maintain your ownership interest or your management position with the company and you would be directly affected by the action of the EQCB.

Thank you for your service on the EQCB. If you have further question regarding these matters, please feel free to contact me.

Sincerely,



Miriam S. Ramos
Deputy General Counsel