



ETHICS COMMISSIONERS

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JOSEPH CENTORINO EXECUTIVE DIRECT OR GENERAL COUNSEL

MICHAEL P. MURAWSKI advocate

MIRIAM S. RAMOS deputy general counsel May 17, 2012

Lawrence Kramer AGI Advanced Green Industries, Inc. 14270 NE 18th Ave. North Miami, FL 33181-1502

Re: INQ 12-89, Limitations on Doing Business with the County

Dear Mr. Kramer:

On May 16, 2012, you asked about limitations in contracting with the County through your privately owned company, which is doing business as AGI Advanced Green Industries, Inc. Your spouse, Barbara M. Kramer, is a member of the board of the Miami-Dade County Homeless Trust.

The County Ethics Code at Sec. 2-11.1 (c)(3) allows you to enter into a contract, individually or through a firm, corporation, partnership or business entity in which you have a controlling financial interest, with Miami-Dade County or any person or agency acting for Miami-Dade County. However, because of your spouse's membership on the Homeless Trust Board, you may not contract with any agency or department of Miami-Dade County subject to the regulation, oversight, management, policy-setting or quasi-judicial authority of the Homeless Trust.

This opinion construes the Miami-Dade County Ethics Code as it applies to County board members at Sec. 2-11.1 (c)(3) only. It is not applicable to any conflicts under other sections of the County Code or to issues related to state or federal laws.

If any of the facts you have presented change or if you have further questions, please feel free to contact me at 305 350-0601.

Sincerely,

VICTORIA FRIGO

Staff Attorney

copy: Barbara M. Kramer at barbara.kramer@citynmb.com

19 WEST FLAGLER STREET SUITE 820 • MIAMI, FLORIDA 33130

TEL. (305) 579-2594