

December 15, 2008

Brandy Abreu, President
BA CAPITAL VENTURE FIRM, INC.
1653 NW 79th Ave.
Doral, FL 33126

**Via First Class Mail
and
Fax at 305 392.5779**

Re: INQ 08-185

BA CAPITAL VENTURE FIRM, INC., may register as a County vendor, as long as BA CAPITAL VENTURE FIRM, INC., does not contract with or is supervised by the County Park and Recreation Department and/or by Oscar V. Abreu or Brey Abreu. (Miami-Dade Co. Conflict of Interest & Code of Ethics at §§ 2-11.1 (c) & (d).)

Dear Mr. Abreu:

In correspondence to our office on December 15, 2008, you said that you wish to register your business, BA CAPITAL VENTURE FIRM, INC., as a County vendor.

The facts as we understand them are as follows:

1. Your father, Oscar V. Abreu, is an Auto Equipment Operator with the Miami-Dade County Park and Recreation Department.
2. Your brother, Brey Abreu, is a Manager with the Miami-Dade County Park and Recreation Department.
3. BA CAPITAL VENTURE FIRM, INC., a business owned by you, engages primarily in transportation and shipping logistics.
4. BA CAPITAL VENTURE FIRM, INC., is seeking to register as a vendor in order to do business with the County.

It is the opinion of the Ethics Commission staff that BA CAPITAL VENTURE FIRM, INC., may register to contract with the County as long as any contract does not interfere with the full and faithful discharge of duties owed to the County by Oscar V. Abreu and Brey Abreu. This includes the requirement that Oscar V. Abreu and Brey Abreu not participate in determining the contract requirements or in awarding the contract. Additionally, none of the job responsibilities and job descriptions of Oscar V. Abreu and Brey Abreu may require them to be involved in the contract in any way including, but not limited to, its enforcement, oversight, administration, amendment, extension, termination, or forbearance. Finally, Oscar V. Abreu and Brey Abreu may not work in any County department that will enforce, oversee, or administer the contract.

If any of the facts you have presented change, or if you have further questions, please do not hesitate to contact me at 305.350.0601.

Sincerely,

VICTORIA FRIGO
Staff Attorney