

January 6, 2009

Jeffrey Beauvoir, President
BEAUVOIR REAL ESTATE INVESTMENTS, INC.
11100 SW 124th St.
Miami, FL 33176

Via First Class Mail and Fax at 305.255.2757

Re: INQ 09-01

Dear Mr. Beauvoir:

Regarding Registering as a County Vendor

In correspondence to our office on January 6, 2009, you said that you wish to register your business, BEAUVOIR REAL ESTATE INVESTMENTS, INC., as a County vendor.

The facts as we understand them are as follows:

1. Your spouse, CHRISTINA BEAUVOIR, is a Cultural Affairs Administrator with the Miami-Dade County CULTURAL AFFAIRS DEPARTMENT.
2. BEAUVOIR REAL ESTATE INVESTMENTS, INC., a business owned by you and in which you serve as President, is in the construction business.
3. BEAUVOIR REAL ESTATE INVESTMENTS, 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 BEAUVOIR REAL ESTATE INVESTMENTS, INC., may register to contract with the County as long as any contract does not interfere with the full and faithful discharge of CHRISTINA BEAUVOIR's duties to the County. This includes the condition that CHRISTINA BEAUVOIR not participate in determining the contract requirements or in awarding the contract. Additionally, none of CHRISTINA BEAUVOIR's job responsibilities and job descriptions may require her to be involved in the contract in any way including, but not limited to, its enforcement, oversight, administration, amendment, extension, termination, or forbearance. Finally, CHRISTINA BEAUVOIR may not work in any County department that will enforce, oversee, or administer the contract.

Regarding Outside Employment

In a telephone conversation today we also discussed that your spouse is an officer of BEAUVOIR REAL ESTATE INVESTMENTS, INC., and that she conducts some work on behalf of your corporation. Depending on the nature and extent of the work Ms. Beauvoir performs for your corporation, she may be required to seek permission from her supervisors to engage in outside employment, and if approved, file annual financial disclosure of outside employment with the

Department of Elections. In general, immediate family members who contribute services to a family-owned business are considered to be engaged in outside employment.

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

Copy:

Michael Spring, Director
Miami-Dade County Cultural Affairs Department
111 NW 1st St., Suite 625
Miami, FL 33128

Attachments:

“Request for Outside Employment” form
“Outside Employment Statement” form