



ETHICS COMMISSIONERS May 11, 2009

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EXECUTIVE DIRECTOR

MICHAEL P. MURAWSKI
ADVOCATE

ARDYTH WALKER
STAFF GENERAL COUNSEL

Luis E. Macias
FL DISTRIBUTION COMPANY, LLC.
8398 NW 70th St.
Miami, FL 33166

Via First Class Mail

Re: INQ 09-67 Registering as a County Vendor

Dear Mr. Macias:

In correspondence to our office on May 6, 2009, you said that you wish to register your company, FL DISTRIBUTION COMPANY, LLC., as a County vendor.

The facts as we understand them are as follows:

- Your wife, Lorena Guerra-Macias, is employed by the office of Miami-Dade County Commissioner Joe Martinez as the Director of Public Affairs and Media Relations.
- FL DISTRIBUTION COMPANY, LLC., is a business owned by you and in which you serve as Manager.
- FL DISTRIBUTION COMPANY, LLC., provides distribution services.

It is the opinion of the Ethics Commission staff that FL DISTRIBUTION COMPANY, LLC., may register to contract with the County as long as any contract does not interfere with the full and faithful discharge of your wife's duties to the County. This includes the condition that Lorena Guerra-Macias will not participate in determining the contract requirements or in awarding the contract. Additionally, none of her responsibilities will 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, your wife may not be employed by any County department or agency that will enforce, oversee, or administer the contract. Therefore, **as long as your wife, Lorena Guerra-Macias, is employed by the office of Miami-Dade County Commissioner Joe Martinez, your company may not contract with the office of Miami-Dade County Commissioner Joe Martinez.**

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 via email to LGuerra@miamidade.gov