



Via First Class Mail
and
email at ebelony@miamidade.gov

ETHICS COMMISSIONERS

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ADVOCATE

ARDYTH WALKER
STAFF GENERAL COUNSEL

August 31, 2010

Erigene P. Belony
THE BELONY LAW GROUP, PLLC
14 NE 1st Ave., Suite 802
Miami, FL 33132

Re: INQ 10-160
Limitations on Doing Business with the County

Dear Mr. Belony:

In correspondence to our office on August 30, 2010, you said that you wish to do business with the County through your privately owned company, THE BELONY LAW GROUP, PLLC.

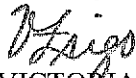
IT IS THE OPINION of the Ethics Commission staff that THE BELONY LAW GROUP, PLLC, may enter into contracts with the County, but not with the Miami-Dade County Transit Department because of your employment with the Transit Department.

THE FACTS as you presented them are that THE BELONY LAW GROUP, PLLC, a for-profit business owned by you, provides legal services. You are employed by the Transit Department as a Manager.

THE COUNTY ETHICS CODE at Section 2-11.1 (c) allows your company to do business with Miami-Dade County as long as the contract does not interfere with the full and faithful discharge of your duties to the County. This includes the condition that you do not participate in determining the contract requirements or in awarding the contract. Additionally, none of your job responsibilities and job descriptions may require you to be involved in the contract in any way including, but not limited to, its enforcement, oversight, administration, amendment, extension, termination, or forbearance. Finally, you may not work in any County department that will enforce, oversee, or administer your 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