



Via First Class Mail
and
email at pepev@aol.com

April 28, 2010

ETHICS COMMISSIONERS

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ARDYTH WALKER
STAFF GENERAL COUNSEL

Jose A. Villalobos
LAW OFFICE JOSE A. VILLALOBOS, PA
123 SE Third Ave., #154
Miami, FL 33131

Re: INQ 10-77 Registering as a County Vendor

Dear Mr. Villalobos:

In correspondence to our office on April 27, 2010, you said that you wish to register your company as a County vendor.

The facts as we understand them are as follows:

- You serve as a volunteer board member on the Miami-Dade County Jay Malina International Trade Consortium.
- You wish to register your privately owned law firm, LAW OFFICE JOSE A. VILLALOBOS, PA, as a County vendor.

It is the opinion of the Ethics Commission staff that you may register to contract with the County as long as any contract does not interfere with the full and faithful discharge of your duties to the County. In particular, **you are "prohibited from contracting with any agency or department of Miami-Dade County subject to the regulation, oversight, management, policy-setting or quasi-judicial authority of the board of which [you are] a member."** See Miami-Dade County Code at Sec. 2-11.1 (c)(3).

This means that as long as you are a board member of the Jay Malina International Trade Consortium, you and/or LAW OFFICE JOSE A. VILLALOBOS, PA, may not contract with the Jay Malina International Trade Consortium or with any County departments or agencies guided by decisions made by the Jay Malina International Trade Consortium.

Additionally, note that you may not vote on any matters that come before the Jay Malina International Trade Consortium if you will be directly affected by the action of the Consortium and you have any of the following relationships with any of the persons or entities appearing before the Consortium: (i) officer, director, partner, of counsel, consultant, employee, fiduciary, or beneficiary; or (ii) stockholder, bondholder, debtor, or creditor. See Miami-Dade County Code at Sec. 2-11.1 (v).

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