



Via First Class Mail
and
email at elicuet@hotmail.com

June 28, 2011

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ARDYTH WALKER
STAFF GENERAL COUNSEL

Pilar D. Cueto
ELICUET CORPORATION
9805 SW 21st St.
Miami, FL 33165

Re: INQ 11-104, Limitations on Doing Business with the County

Dear Ms. Cueto:

In correspondence to our office on June 27, 2011, you said that you wish to do business with the County through ELICUET CORPORATION, a privately owned company that provides general construction services. You serve as Vice President of ELICUET CORPORATION, and your spouse, Jose E. Cueto, is employed by the Miami-Dade County Seaport as a Construction Manager III.

The County Ethics Code allows ELICUET CORPORATION to enter into contracts with all County departments except the Miami-Dade County Seaport because of your spouse's employment with the Seaport.

Specifically, the County Ethics Code at Sec. 2-11.1 (c) allows your company to enter into a contract with Miami-Dade County as long as the contract does not interfere with the full and faithful discharge of your spouse's duties to the County. This includes the condition that Jose E. Cueto does not participate in determining the contract requirements or in awarding the contract. Additionally, none of his job responsibilities and job descriptions may require him to be involved in the contract in any way including, but not limited to, its enforcement, oversight, administration, amendment, extension, termination, or forbearance. Finally, Jose E. Cueto may not work in any County department that will enforce, oversee, or administer your contract. In your case, this means, at a minimum, that you may not enter into contracts with the Seaport.

If any of the facts you have presented change, or if you have further questions, please feel free to contact me at 305 350-0601.

Sincerely,

VICTORIA FRIGO
Staff Attorney

copy: Jose E. Cueto at CuetoJ@miamidade.gov