



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

March 15, 2011

ETHICS COMMISSIONERS

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ADVOCATE

ARDYTH WALKER
STAFF GENERAL COUNSEL

Katherine Naranjo
LOUNA CORP.
14181 SW 151st Ct.
Miami, FL 33196

Re: INQ 11-44, Limitations on Doing Business with the County*

Dear Ms. Naranjo:

In correspondence to our office on March 8, 2011, you said that you wish to do business with the County through LOUNA CORP., a privately owned construction business in which your husband serves as President and you serve as Vice-President and qualifier.

The County Ethics Code allows LOUNA CORP. to enter into contracts with all County departments **except** the Miami-Dade County **Parks & Recreation Department** because of your employment as a Parks Construction Contract Specialist with the Parks & Recreation Department. You are also advised to contact your department supervisor to determine if additional prohibitions exist for Construction Contract Specialists.

Specifically, the County Ethics Code at Sec. 2-11.1 (c) allows you and/or 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 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. In your case, this means that **you may not enter into contracts with the Parks & Recreation Department.**

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

* The Miami-Dade County Code at §§ 2-11.1 (j) & (k) also requires you to **obtain permission to engage in outside employment** and submit appropriate forms.