



Via First Class Mail  
and  
email at [info@codemaxelectric.com](mailto:info@codemaxelectric.com)  
[ADeLaO@miami-airport.com](mailto:ADeLaO@miami-airport.com)

March 31, 2011

**ETHICS COMMISSIONERS**

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ADVOCATE

**ARDYTH WALKER**  
STAFF GENERAL COUNSEL

Angel De La O, President  
CODE MAX ELECTRIC CORP.  
1040 Starling Ave.  
Miami Springs, FL 33166

Re: INQ 11-56, Limitations on Doing Business with the County

Dear Mr. De La O:

In correspondence to our office on March 31, 2011, you said that you wish to do business with the County through CODE MAX ELECTRIC CORP., a privately owned electrical contracting business in which you serve as President. Your spouse, Mercedes De La O, is employed at the Miami-Dade County Seaport as an Administrative Officer II.

The County Ethics Code allows CODE MAX ELECTRIC CORP, 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 Mercedes De La O does not participate in determining the contract requirements or in awarding the contract. Additionally, none of her job responsibilities and job descriptions may 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, Ms. De La O 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 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

copies: James Gaspard (DPM) at [gaspard@miamidade.gov](mailto:gaspard@miamidade.gov)  
Mercedes De La O (Seaport) at [hernam@miamidade.gov](mailto:hernam@miamidade.gov)