



Via First Class Mail and  
email at [fvald@bellsouth.net](mailto:fvald@bellsouth.net)

*This letter DOES NOT grant permission to engage in outside employment. Permission to engage in outside employment must be obtained from, and is at the sole discretion of, your supervisor.*

**ETHICS COMMISSIONERS**

Dawn Addy, CHAIR  
Charlton Copeland, VICE CHAIR  
Nelson Bellido  
Judge Seymour Gelber  
Kerry E. Rosenthal

April 12, 2012

**JOSEPH CENTORINO**  
EXECUTIVE DIRECTOR  
GENERAL COUNSEL

Felix Valdes  
V Engineering & Consulting Corp.  
2138 SW 23 St.  
Miami, FL 33145

**MICHAEL P. MURAWSKI**  
ADVOCATE

Re: INQ 12-71, Limitations on Doing Business with the County

**MIRIAM S. RAMOS**  
DEPUTY GENERAL COUNSEL

Dear Mr. Valdes:


On April 5, 2012, you asked about limitations in doing business with the County through your privately owned company, V Engineering & Consulting Corp., which deals in construction services. You are employed as a Construction Manager 2 with the Internal Services Department (ISD).

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 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 V Engineering & Consulting Corp. may not enter into contracts with the Miami-Dade County Internal Services Department.

This opinion construes the Miami-Dade County Ethics Code as it applies to County employee-vendors at Sec. 2-11.1 (c) only. It is not applicable to any conflicts under other sections of the County Code or to issues related to state or federal laws.

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