



Via First Class Mail and
email at stabor@airmanager.com

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September 10, 2013

Sean Burnham Tabor
AirManager Technologies, LLC
100 Crescent Court, Suite 700
Dallas, TX 75201

Re: INQ 13-222, Limitations on Doing Business with the County

Dear Mr. Tabor:

On September 6, 2013, you asked about limitations AirManager Technologies, LLC, may encounter in doing business with the County based on your position with the privately owned company as Vice President. We understand that AirManager Technologies, LLC, develops and sells air treatment systems. Your father, George J. Tabor, is the Logistics Services Manager at the Miami-Dade County Fire Rescue Department.

The County Ethics Code at Sec. 2-11.1 (c)(2) allows your employer 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 father's duties to the County. This includes the condition that he does not participate in determining the contract requirements or in awarding the contract. Additionally, none of your father's 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, he may not work in any County department that will enforce, oversee or administer your contract. In your case, this means that AirManager Technologies, LLC, may not enter into contracts with the Miami-Dade County Fire Rescue Department.

This opinion construes the Miami-Dade County Ethics Code as it applies to County vendors who employ relatives of County employees at Sec. 2-11.1 (c)(2) 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
Senior Staff Attorney

copy: George J. Tabor at taborg@miamidade.gov