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**From:** Diaz-Greco, Gilma M. (COE)  
**Sent:** Thursday, April 02, 2015 1:10 PM  
**To:** Sanchez, Rodzandra (COE)  
**Subject:** Clarence Brown, Division Director, PHCD and Board Member, South Florida Workforce Investment Board (Voting Conflict) INQ 15- 53

INQ 15-53 Brown

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**From:** Ethics (COE)  
**Sent:** Thursday, April 02, 2015 12:58 PM  
**To:** Brown, Clarence D. (PHCD); Ethics (COE)  
**Cc:** Neuman, Brenda (CAO); Diaz-Greco, Gilma M. (COE); Sanchez, Gerald (CAO)  
**Subject:** INQ - Clarence Brown, Division Director, PHCD and Board Member, South Florida Workforce Investment Board (Voting Conflict)

Mr. Brown,

You have inquired regarding whether there would any voting conflict created by your service on the board of the South Florida Workforce Investment Board (SFWIB) as Housing Representative to the board, and your current position in Miami-Dade County where you serve as Division Director working with the Community Development programs, including the County's Community Development Block Grant Program, from which was allocated \$175,000 by the Board of County Commissioners for job training activities. Where you have no personal financial interest in these matters that may be considered by the board, and where you have no personal financial interest in any matter dealing with the board, nor would you stand to profit or be personally enhanced by your voting on these issues in connection with your board duties, I do not find that you have any prohibited voting conflict of interest in voting on or otherwise participating in matters coming before the board in connection with the County's CDBG Block Grant Program;. Also, since your service on the board is directly connected to your public duties with the County, I see no basis to consider your role on the board to create any ongoing conflict with your duties with the County. If, however, you were to confront an issue on which you felt you could not make an objective judgment due to some presently unforeseen conflict with your County position, or if you felt that an appearance of impropriety would be created by your participation in a particular item, you might be justified in recusing yourself from that issue and you should seek an opinion from this agency regarding that potential conflict.

Sincerely,  
Joseph M. Centorino  
Executive Director and General Counsel  
Miami-Dade Commission on Ethics and Public Trust

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**From:** Brown, Clarence D. (PHCD)  
**Sent:** Tuesday, March 24, 2015 9:57 AM  
**To:** Ethics (COE)  
**Cc:** Neuman, Brenda (CAO)  
**Subject:** Service as a SFWIB Memeber

I have served on the board of the South Florida Workforce Investment Board (SFWIB) for approximately seven years. I was appointed by the Mayor of Miami-Dade County as a Housing Representative. I have no financial interest in my role on this public board. In my current position for Miami-Dade County I serve as a Division Director directly working with the Community Development programs, including the County's Community Development Block Grant (CDBG) program. As part of the County's 2014 allocations of CDBG, SFWIB was awarded \$175,000 by the Board of County

Commissioners for job training activities. Is there a conflict of interest as it relates to my role on the SFWIB and my employment as a Division Director with Miami-Dade County's Department of Public Housing and Community Development?

Clarence Brown  
Division Director, PHCD  
786-469-2221