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**From:** Diaz-Greco, Gilma M. (COE)  
**Sent:** Thursday, April 02, 2015 3:00 PM  
**To:** Sanchez, Rodzandra (COE)  
**Subject:** Miami-Dade County Commissioner Barbara Jordan (Conflict of Interest) INQ 15-55

INQ 15-55 Jordan

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**From:** Neuman, Brenda (CAO)  
**Sent:** Thursday, April 02, 2015 2:35 PM  
**To:** Centorino, Joseph (COE)  
**Cc:** Graves, Shanika (CAO); Hawkins, Ryan (DIST1); Diaz-Greco, Gilma M. (COE); Sanchez, Gerald (CAO)  
**Subject:** RE: INQ - Miami-Dade County Commissioner Barbara Jordan (Conflict of Interest)

Thank you, Mr. Centorino, for your thoughtful response. Have a great day.

Best regards,

Brenda Kuhns Neuman  
Assistant County Attorney  
Miami-Dade County Attorney's Office  
111 NW 1st Street, Suite 2810  
Miami, FL 33128  
Tel: 305-375-3560  
Email: [bjk@miamidade.gov](mailto:bjk@miamidade.gov)

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**From:** Centorino, Joseph (COE)  
**Sent:** Thursday, April 02, 2015 2:33 PM  
**To:** Neuman, Brenda (CAO)  
**Cc:** Graves, Shanika (CAO); Hawkins, Ryan (DIST1); Diaz-Greco, Gilma M. (COE); Sanchez, Gerald (CAO)  
**Subject:** INQ - Miami-Dade County Commissioner Barbara Jordan (Conflict of Interest)

Ms. Neuman,

Ms. Neuman,

You have inquired on behalf of Miami-Dade County Commissioner Barbara Jordan regarding whether she may have a Voting or other Conflict of Interest in connection with her service as an unpaid board member of the South Florida Workforce Investment Board (SFWIB), a government agency and instrumentality of both Miami-Dade and Monroe Counties for which Miami-Dade County is the fiscal agent and administrative entity. She has been appointed to the board by the County Mayor. All board members of SFWIB serve without compensation. SFWIB has been awarded \$175,000 in Community Development Block Grant funds by the Miami-Dade Board of County Commissioners to run an employment training program.

Since both the Miami-Dade County Commission and the SFWIB are governmental entities, and since Commissioner Jordan is an unpaid member of SFWIB, and has no financial or other personal interest in SFWIB, I do not foresee any voting conflict of interest or other conflict of interest created by her membership and participation on SFWIB. It appears

that her service on the SFWIB is consistent with her public duties as a County Commissioner and would not place her in a position adverse to those duties. I do not foresee that she would personally profit or be enhanced by her voting on or participating in items coming before SFWIB. Therefore, she may serve on the SFWIB and participate in matters coming before the board.

In the event that Commissioner Jordan should ever feel that she cannot be objective in a matter coming before the SFWIB due to her other position in a way that would compromise her independence or would create an appearance of impropriety, then she should seek another opinion from us to determine whether she may recuse herself in that matter.

Sincerely,

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

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**From:** Neuman, Brenda (CAO)  
**Sent:** Thursday, April 02, 2015 1:51 PM  
**To:** Centorino, Joseph (COE)  
**Cc:** Graves, Shanika (CAO); Hawkins, Ryan (DIST1)  
**Subject:** SFWIB and Commr Jordan

Mr. Centorino,

Please advise whether Commissioner Jordan needs to seek a formal opinion from the Commission on Ethics regarding the situation described below.

County Commissioner Barbara Jordan also sits as an unpaid board member on the South Florida Workforce Investment Board (“SFWIB”), a public board and bi-County instrumentality which was awarded \$175,000.00 of Community Development Block Grant (“CDBG”) funds by the Board of County Commissioners to run an employment training program. Miami-Dade County and the SFWIB seek to enter into a CDBG contract for the funds awarded.

Commissioner Jordan has no direct or indirect financial interest, nor any controlling financial interest in the SFWIB. Neither Commissioner Jordan nor any of her immediate family members have a financial interest, direct or indirect, in the award of CDBG funds to the SFWIB or the resulting CDBG contract between Miami-Dade County and the SFWIB.

The SFWIB was created by Interlocal Agreement between Miami-Dade and Monroe Counties. Pursuant to that Interlocal Agreement, the SFWIB is a governmental agency and instrumentality of both Miami-Dade and Monroe Counties. All employees of the SFWIB are employees of Miami-Dade County. SFWIB is governed by Miami-Dade County administrative orders and policies, and Miami-Dade County is the fiscal agent and administrative entity for the SFWIB. Legal counsel for the SFWIB is the Miami-Dade County Attorney’s Office. The SFWIB is subject to Florida’s public records and open meeting “Sunshine” laws. All of the SFWIB’s board members serve without compensation and are appointed by the Miami-Dade County Mayor.

Thank you for your time.

Best regards,

Brenda Kuhns Neuman  
Assistant County Attorney  
Miami-Dade County Attorney's Office  
111 NW 1st Street, Suite 2810  
Miami, FL 33128  
Tel: 305-375-3560  
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