

MEETING: PALM BEACH COUNTY COMMISSION ON ETHICS (COE)

I. **CALL TO ORDER:** November 3, 2011, at 1:40 p.m., in the Commission Chambers, 6th Floor, Governmental Center, West Palm Beach, Florida.

II. **ROLL CALL**

COMMISSIONERS:

Judge Edward Rodgers, Chair
Manuel Farach, Esq., Vice Chair – Arrived later
Robin N. Fiore, Ph.D
Ronald E. Harbison, CPA
Bruce E. Reinhart, Esq.

STAFF:

Mark E. Bannon, COE Investigator
Alan S. Johnson, Esq., COE Executive Director
Gina A. Levesque, COE Administrative Assistant
Megan C. Rogers, Esq., COE Staff Counsel
Julie Burns, Deputy Clerk, Clerk & Comptroller's Office

Judge Edward Rodgers stated that there was a quorum.

III. **INTRODUCTORY REMARKS**

Judge Rodgers requested that everyone turn off or silence all cell phones, and that if anyone wished to speak, a comment card containing the agenda item should be filled out and submitted to a Commission on Ethics (COE) staff member.

IV. **APPROVAL OF MINUTES FROM OCTOBER 6, 2011**

MOTION to approve the October 6, 2011, minutes. Motion by Bruce Reinhart, seconded by Ronald Harbison, and carried 4-0. Manuel Farach absent.

RECESS

At 1:42 p.m., the chair declared the meeting recessed for an executive session.

RECONVENE

At 2:47 p.m., the meeting reconvened with Manuel Farach, Robin Fiore, Ronald Harbison, Bruce Reinhart, and Judge Rodgers present.

(CLERK'S NOTE: A roll call was taken again at this time, and all the commissioners were present.)

Judge Rodgers stated that:

- Cell phones should be turned off or silenced.
- Public comments were welcome. If anyone wished to speak, a public comment card containing the agenda item should be filled out and submitted to a COE staff member.
- Public comments were limited to three minutes, and should be relative to agenda items.
- No one should make accusations regarding someone's statements unless the person was present to respond to them.

V. EXECUTIVE SESSION (1:45 P.M. – 2:15 P.M.)

V.a. C11-019

Commissioner Manuel Farach read a portion of the COE's public report and final order of dismissal as follows:

Complainant, Paul Beaudreau, a Palm Beach County employee, filed the above-referenced complaint on September 30, 2011, alleging a possible ethics violation involving respondent, Sheryl Steckler, Palm Beach County Inspector General.

(This space intentionally left blank.)

V. – CONTINUED

Commissioner Farach stated that the COE's full report would be made public possibly by tomorrow. He read the following conclusion:

On October 15, 2011, the complaint of Mr. Beaudreau was determined by staff to be legally insufficient and presented to the Commission on Ethics on November 3, 2011, with a recommendation of dismissal as legally insufficient. The Commission on Ethics reviewed the staff inquiry report and determined that the allegations against respondent, Sheryl Steckler, do not constitute a violation of the Palm Beach County Code of Ethics because there is no evidence of financial or corrupt misuse of office, and dismissed the complaint on November 3, 2011, due to no legal sufficiency. Done and ordered by the Palm Beach County Commission on Ethics in public session on November 3, 2011. Signed by Edward Rodgers, chair of the Palm Beach County Commission on Ethics.

V.b. C11-020

Commissioner Farach read a portion of the COE's public report and final order of dismissal as follows:

Complainant, Paul Beaudreau, a Palm Beach County employee, filed the above-referenced complaint on September 30, 2011, alleging possible ethics violations involving respondent, Wayne Condry, Palm Beach Director of Human Resources.

(This space intentionally left blank.)

V. – CONTINUED

Commissioner Farach stated that the COE's public report and final order of dismissal would be available possibly tomorrow. He read the following conclusion:

On October 15, 2011, after an initial inquiry into the matter, the complaint was determined by staff to be legally insufficient and presented to the Commission on Ethics on November 3, 2011, with a recommendation of dismissal as legally insufficient. The Commission on Ethics reviewed the staff inquiry report and determined that the allegations against respondent, Wayne Condry, do not constitute a violation of the Palm Beach County Code of Ethics because there is no evidence of financial or corrupt misuse of office and dismissed the complaint on November 3, 2011, due to no legal sufficiency. The decision of the Commission on Ethics construes only the Palm Beach County Code of Ethics ordinance and is not applicable to any other legal or administrative rules that may apply. Done and ordered by the Palm Beach County Commission on Ethics in public session on November 3, 2011. Signed: Edward Rodgers, chair.

(CLERK'S NOTE: An unscheduled item was presented at this time.)

XIII. UNSCHEDULED ITEM

Judge Rodgers said that a Board of County Commissioners (BCC) proclamation declaring November 18, 2011, as Palm Beach County Ethics Awareness Day was given to the COE.

Alan Johnson, Esq., COE executive director, commented that:

- On November 18, 2011, at 9:00 a.m. in the Commission Chambers, Dr. Robin Fiore would be making a keynote address with a panel discussion to follow.
- At 3:00 p.m., Palm Beach Atlantic University would be demonstrating an ethics bowl competition event, with another panel discussion regarding general ethics to follow.

XIII. – CONTINUED

- At 7:00 p.m., he and Inspector General (IG) Sheryl Steckler would be attending a final panel discussion at Florida Atlantic University's honors college in the Town of Jupiter. The topic of discussion would be the future of County-enacted ethics programs.
- A partnership between Palm Beach State College and the Palm Beach County School Board culminated in declaring November 14-18, 2011, as Ethics Week. Both entities would be conducting joint ethics programs in the public schools.

VI. PROCESSED ADVISORY OPINIONS (CONSENT AGENDA)

VI.a. Request for Advisory Opinion (RQO) 11-095

VI.b. RQO 11-098

MOTION to approve the Consent Agenda. Motion by Robin Fiore, seconded by Bruce Reinhart, and carried 5-0.

VII. ITEMS PULLED FROM CONSENT AGENDA – None

VIII. CITY OF BOCA RATON ADVISORY BOARD CONFLICTS (PREVIOUSLY TABLED)

(CLERK'S NOTE: RQO 11-067 and RQO 11-076 were discussed in tandem and voted on separately.)

Mr. Johnson said that RQO 11-067 and RQO 11-076 involved the City of Boca Raton (Boca Raton) licensure boards.

VIII.a. RQO 11-067

VIII.b. RQO 11-076

Megan C. Rogers, Esq., COE staff counsel, stated that:

- Based on the voting conflicts section of the County's Code of Ethics (Code), staff initially submitted that once a conflict came before an advisory board, an advisory board member, who was also a licensed professional, should abstain and not participate, even with staff.

VIII.a. AND VIII.b.— CONTINUED

- Until the conflict came before the advisory board, the member could participate with staff; however, under Sunshine Law requirements, the member could not discuss the matter with other advisory board members.
- Under the Code's misuse of office section, the advisory board member would also be prohibited from using his or her official position in any way to give a client a special financial benefit.

PUBLIC COMMENTS: Richard Radcliffe, Jennifer Ashton, Maziar Keshavar, James H. Anstis, Reverend Canon Howarth Lewis, and Dan Clark.

Dr. Fiore said that:

- The COE members had worked through various scenarios and had looked at possibilities during the last COE meeting.
- Mere disclosure did nothing to protect the public from conflicts.
- Advisory board members performed jobs without remuneration for communities and towns; however, advisory board members should not serve for the sole purpose of generating business for their employers.

Commissioner Bruce Reinhart commented that:

- The COE existed to enforce a code that was provided by the BCC after due consideration from the Palm Beach County Ethics Ordinances Drafting Committee (drafting committee).
- Staff had correctly analyzed, and had reasonably interpreted, the Code's language.

Commissioner Ronald Harbison stated that the public should view the COE's comments on the dais as somewhat improvisational since the COE members could only discuss matters at COE meetings. He added that:

- It was clear that the Code's language favored a philosophy of disclosure and recusal rather than a prohibition from serving.
- The COE would handle the lack of timely disclosures on a case-by-case basis.

VIII.a. and VIII.b. – CONTINUED

- In general, the COE may need to depart from how some situations were previously handled and ensure that any changes conform to the ethics infrastructure.

Commissioner Farach said that:

- The Code ordinance referenced in the proposed advisory opinion letters had elevated form over substance.
- It was unreasonable, illogical, and unrealistic to believe that influence would not occur by someone who participated on an advisory board and was, in effect, submitting his or her application to the advisory board on behalf of a client for financial gain.

Commissioner Harbison stated that he would amend his previous comments to concur with Commissioner Farach's statements.

ADDITIONAL PUBLIC COMMENT: Maziar Keshavar.

Mr. Johnson said that Richard Radcliffe, League of Cities (League) executive director, had informed him that the League was in contact with Shannon LaRocque-Baas, assistant County administrator, who had requested a possible voting delay on the matter until next month. He added that he believed the request would be withdrawn if the proposed advisory opinion letter was accepted.

Joannie Hamilton (phonetic), Boca Raton representative, stated that no issue existed if the COE voted on the matter today.

Mr. Johnson added that:

- Although some of the issues were becoming blurred, a different Code section applied for individuals who sat on advisory boards, and who had conflicting contracts.
 - Advisory board members or department heads could not sit on boards if they oversaw, managed, or conducted policy setting regarding the conflicting contracts.
 - Advisory board members could apply for waivers if they only sat for advisory purposes; however, sitting on governing boards was prohibited.

VIII.a. AND VIII.b. – CONTINUED

- Most advisory opinion letters dealt with customers or clients who worked with advisory board members to get approval of advisory board projects.
- The Code's misuse of office sections still applied to the referenced situations.
- Advisory opinion letters RQO 11-067 and RQO 11-076 related to the Code's voting conflict section 2-443(c), and their proposals went beyond State law, which allowed participation after disclosure.

MOTION to approve advisory opinion letter RQO 11-067. Motion by Bruce Reinhart, seconded by Robin Fiore, and carried 5-0.

MOTION to approve advisory opinion letter RQO 11-076. Motion by Bruce Reinhart, seconded by Robin Fiore, and carried 5-0.

Mr. Johnson stated that staff would bring back the voting conflict issue in a separately noticed meeting if another drafting committee convened to discuss whether amendments to section 2-443(c) were warranted.

Dr. Fiore expressed concern about the Code's constant revisions. She said that the COE should attempt to work with what was available rather than bringing issues that were lengthily discussed by the COE before a drafting committee.

IX. PROPOSED ADVISORY OPINIONS

IX.a. RQO 11-089

Mr. Johnson stated that the requested advisory opinion was by a State reporting individual. He requested that the item be tabled for 30 days since the information would somewhat change the opinion.

(CLERK'S NOTE: Commissioner Reinhart left the meeting.)

MOTION to table proposed advisory opinion letter RQO 11-089. Motion by Robin Fiore, seconded by Ronald Harbison, and carried 4-0. Bruce Reinhart absent.

(CLERK'S NOTE: Commissioner Reinhart rejoined the meeting.)

IX.a. – CONTINUED

Commissioner Reinhart said that he would join in tabling RQO 11-089.

MOTION now carried 5-0, the chair declared.

IX.b. RQO 11-090

Mr. Johnson stated that:

- A Town of Palm Beach Shores (PBS) public works director asked whether a prohibited conflict of interest was created if his spouse submitted a sealed bid to his government employer and was awarded a contract to provide lawn and landscape services.
- The underlying contract was supervised by the PBS manager, and the employee was not involved in the contract's bid specifications or oversight.
- Staff had recommended that:
 - Municipal employees may not use their public position to give a special financial benefit to their spouse's outside business.
 - While the Code prohibited employees or officials from contracting with the government that they served, spouses and relatives were not prohibited from contracting with their spouse's public employer, provided that the employees or officials were not owners, principals, or employees of the spouse's business and did not use their official position to benefit that business.

Commissioner Harbison said that although public employees may not be participants in a business, they may be stockholders.

Mr. Johnson responded that stockholder language could be added to the advisory opinion letter.

Judge Rodgers stated that he would not support staff's recommendation.

IX.b. – CONTINUED

Dr. Fiore stated that individuals were entitled to pursue their economic interest, and any form of prohibition or limitation reduced the ability of public employees' spouses to support themselves.

Commissioner Reinhart stated that a spousal relationship should be considered an indirect relationship, and that he concurred with Judge Rodgers.

Commissioner Farach said that a numerical test regarding financial benefit had been applied to two previous advisory opinion letters, with the COE members voting that no conflict of interest existed if the connection to a municipality was sufficiently attenuated.

Mr. Johnson said that one of the previous advisory opinion letters had involved a potential, economic benefit, which was attenuated to the individual. He added that it would be far reaching to decide that spouses or domestic partners could not do business with a municipality where their spouses or partners were employed or were officials.

MOTION to table proposed advisory opinion letter RQO 11-090 until additional facts were obtained. Motion by Bruce Reinhart.

(CLERK'S NOTE: Motion was seconded later in the meeting.)

Commissioner Harbison suggested that S & W Professional Services could be researched regarding what form of business entity it was and who the shareholders were.

Ms. Rogers said that:

- The business was not registered as a limited liability company or as any form of corporation in Florida.
- The contract had expired on September 30, 2011.
- The municipal employee had not been involved in the enforcement, oversight, administration, or any other facet of the lawn maintenance contract.
- Although not stated in RQO 11-090, the municipal employee had stipulated that he did not work for his wife's independent business.

IX.b. – CONTINUED

MOTION SECONDED by Manuel Farach, and carried 5-0.

Commissioner Reinhart requested that the additional facts include what role the contract played in the business' overall revenues and structure.

Dr. Fiore suggested that the research include whether the municipal employee and his spouse had filed a joint tax return.

Commissioner Harbison said that the tax return should be reviewed to determine whether a Schedule C was included.

Mr. Johnson stated that:

- Under the current Code, had the lawn service's proprietor filed the intent to bid with the COE and the Supervisor of Elections, the entire situation may have been exempted from section 2-443(d).
- He supported Commissioner Reinhart's suggestion of informing the proprietor that she could file an intent to bid with the COE and the Supervisor of Elections.

Judge Rodgers expressed concern about the COE being labeled as sanctioning matters. He said that it would be counterproductive to the COE's efforts to foster integrity and to promote public trust.

IX.c. RQO 11-091

Mr. Johnson stated that:

- A County employee asked whether the Code prohibited public employees from using their public email to solicit donations and gifts from other County employees on behalf of church projects.
- The County employee was a church member and not an officer or a director.
- The solicitation was mostly for in-kind toiletry contributions.

IX.c. – CONTINUED

- Staff had recommended that:
 - The Code did not prohibit public employees from soliciting donations from coworkers for nonprofit organizations unless they were officers or directors of the nonprofit organizations or unless the soliciting was done corruptly.
 - The COE should state that it could not opine as to County policy or procedure regarding the use of County resources to solicit for donations.

Dr. Fiore commented that the question of solicitation should be handled by the County employee's manager. She suggested that the third paragraph, last sentence of RQO 11-091 should read: "The COE cannot opine as to county policy or procedure regarding solicitations and the use of county resources in this manner."

MOTION to approve proposed advisory opinion letter RQO 11-091 as amended to include adding the word, solicitations, to page 1, third paragraph, last sentence, after the word, regarding. Motion by Robin Fiore, seconded by Manuel Farach, and carried 5-0.

IX.d. RQO 11-092

Mr. Johnson stated that:

- The Village of Wellington (Village) attorney had asked whether a Village council member, whose outside business provided engineering services to the County, could vote on interlocal agreements between the Village and her government client.
- Staff had submitted that:
 - Municipal officials, whose outside business or employer contracted with County government, were not prohibited from voting on contracts between their government client and the government that they served, provided that the interlocal agreement was unrelated to their business relationship with the government client, or did not otherwise give their outside business a special financial benefit.

IX.d. – CONTINUED

- Voting on interlocal agreements that may result in a special financial benefit to the municipal officer's outside employer or business would violate the Code's misuse of office provision.
- In RQO 11-092, the outside business only dealt with the County, that represented all County residents; therefore, there was no special benefit as long as the contract did not otherwise violate the Code by giving a special benefit to the outside business.
- For clarity, the words, Councilperson Gerwig, on page 2, second-to-last paragraph, last sentence, could be changed to, Councilperson Gerwig's outside business or employer.

Dr. Fiore noted that the word, you, on page 3, second paragraph, first line, should be changed to Councilperson Gerwig; and the last line should read, Councilperson Gerwig, her husband, or the firm.

Commissioner Reinhart said that the word, based, on page 3, second paragraph, first line, should not be capitalized.

MOTION to approve proposed advisory opinion letter RQO 11-092 as amended to include the changes as discussed. Motion by Bruce Reinhart, seconded by Robin Fiore, and carried 5-0.

IX.e. RQO 11-093

Ms. Rogers stated that:

- A County-vendor employee, who was appointed by the League to a County technical and professional working group, asked whether he could continue to serve as a group member.
- The group reported to the Water Resources Task Force (WRTF). While the resolution that created the WRTF addressed the existence of a working group, it did not address its creation.
- The group could only convene at the WRTF chairman's request, and only for the limited purpose of answering technical questions.

IX.e. – CONTINUED

- Staff had submitted that:
 - The COE's jurisdiction was limited to municipal and County employees, officials, and advisory board members.
 - Although the group reported to a County advisory board rather than a municipal or County governing body, it was not an advisory board created either by the County or a municipality.
 - As a League appointee and not an appointee of the BCC or a municipality within the County, the group member who requested the letter was not considered an official, nor an advisory board member under the Code's definition; therefore, he was not subject to the Code's provisions.

Mr. Radcliffe stated that it was very difficult to find individuals with expertise who were willing to donate their time. He added that:

- The State had requested that the group work on a long-term strategy regarding the rise in sea level.
- The group member would work with the Emergency Operations Center (EOC) on post-disaster development plans.
- The group would also review future water issues and supply.
- The group's recommendations would be brought before the EOC and placed into a working plan for countywide distribution.

Dr. Fiore said that she disagreed that the group member was not considered an official under the Code's definition, and that she was unclear why the waiver process was not applied in this matter.

Ms. Rogers clarified that:

- As a County-vendor employee, the group member would be subject to vendor requirements under the Code's gift section.

IX.e. – CONTINUED

- If the group was considered an advisory board, the waiver requirement would only pertain to officials applying for that waiver.
- Since the group member was appointed by the League and not the BCC, there was no vehicle with which to apply for a waiver.

Commissioner Farach stated that for disclosure purposes, Engenuity Group, Inc., was owned by Town of Palm Beach Shores Vice Mayor Tropepe.

MOTION to approve proposed advisory opinion letter RQO 11-093. Motion by Bruce Reinhart, seconded by Ronald Harbison, and carried 4-1. Robin Fiore opposed.

IX.f. RQO 11-094

Ms. Rogers stated that:

- A City of Palm Beach Gardens (City) employee inquired whether she and her husband, who also worked for the City, could participate in fundraising efforts for Palm Beach Gardens High School's Project Graduation.
- The City employee's son, who also worked part-time for the City, planned to attend the event.
- Historically, parents of graduating seniors solicited donations from local businesses, some being City vendors.
- The City employee asked whether in a private capacity, her name could be included on a letter requesting donations from local City vendors.
- Staff had submitted that:
 - Since the son would receive a financial benefit by being able to attend Project Graduation's party, the City employee would be prohibited from soliciting City vendors for a coworker's or a relative's personal, financial benefit.

IX.f. – CONTINUED

- Public employees were not prohibited in their personal capacity from soliciting or accepting donations for their children's benefit from persons or entities who were not vendors, lobbyists, principals, or employees of lobbyists who sold, leased, or lobbied their municipalities as long as there was no quid pro quo or other benefit given for an official act or performance of their public duty, and as long as they did not use their official position or title if they or their children were eligible for that special financial benefit.
- Typically, a municipal employee could solicit on behalf of a nonprofit organization if a log of the solicited vendors or lobbyists was created.

MOTION to approve proposed advisory opinion letter RQO 11-094. Motion by Bruce Reinhart, seconded by Manuel Farach, and carried 5-0.

IX.g. RQO 11-096

Mr. Johnson stated that:

- A Town of Highland Beach (Town) finance director asked whether the current Town attorney, who resigned his position effective December 31, 2011, could meet for lunch with Town employees or officials to discuss the Request for Qualifications (RFQ) process for selecting his replacement where the current contract was with the attorney's law firm and not specifically with the Town attorney.
- Staff had submitted that:
 - Employees may not use their official position to obtain a financial benefit not shared by similarly-situated members of the general public for themselves or their outside business or employer.
 - A contract for services or a service contract renewal was a financial benefit to the applicant; therefore, a contracted Town employee with a pending application before the Town could not discuss the application with officials or employees unless all other applicants were given the same opportunity, and in the same manner, as the Town employee. The circumstances extended to an application submitted by the Town employee's outside business or employer.

IX.g. – CONTINUED

- The current Town attorney's meetings with officials would be in his official capacity to discuss the RFQ process.

MOTION to approve proposed advisory opinion letter RQO 11-096. Motion by Manuel Farach, seconded by Ronald Harbison, and carried 5-0.

IX.h. RQO 11-097

Mr. Johnson stated that:

- A Town of Palm Beach (Palm Beach) police officer asked whether he was required to report a fellow police officer's gift of discounted tickets to a charity function valued over \$100. If required to report, he also asked whether the gift reporting requirement applied to all nonexempt gifts given during the fiscal year, but prior to the effective date of the Code.
- Staff had submitted that:
 - A municipal employee was not required to report a gift motivated by a personal friendship or a social relationship provided the gift was not given by a vendor, lobbyist, principal, or employer of a lobbyist who sold, leased, or lobbied his or her municipality.
 - The police officer who originally received the discounted tickets needed to report the gift if it valued over \$100.
 - The requirement to report gifts was procedural, meaning that it was not a substantive violation.
 - When the event was held in January 2011, the Code was not in effect for municipalities. Any gift received from vendors or lobbyists, as long as there was no State violation, would not violate the Code since matters could not be determined retroactively.
 - The Code was in force as of November 1, 2011, and as a procedural requirement, an individual was required to report all gifts.

IX.h. – CONTINUED

MOTION to approve proposed advisory opinion letter RQO 11-097. Motion by Ronald Harbison, seconded by Bruce Reinhart, and carried 5-0.

X. RULES OF PROCEDURE AMENDMENTS

X.a. Section 2.8(g)

Mr. Johnson stated that:

- Although there was no Code requirement, Rules of Procedure, subsection 2.8(g), required signatures of the COE executive director and the chairperson or co-chairperson on an advisory opinion letter.
- The Code only required that COE opinions be rendered by the COE on a timely basis, and that the opinions should be numbered, dated, and published.
- In reviewing approximately 12 entities' rules, he was unable to find any requirement of dual signatures.
- Dual signatures would create extra work.
- Advisory opinion letters showed Code compliance since the first line of each letter stated that the Palm Beach County Commission on Ethics considered the request for an advisory opinion and rendered its opinion at a public meeting held on a certain date.
- The signature at the end of each letter referred to the COE, who had made the decision.

MOTION to approve Rules of Procedure's section 2.8(g) language, as amended to read, Signature of the Executive Director or COE Staff Counsel. Motion by Bruce Reinhart, seconded by Manuel Farach, and carried 5-0.

RULES OF PROCEDURE AMENDMENTS - CONTINUED

X.b. Section 5.8

Mr. Johnson stated that

- Section 5.9 of section E in the Rules of Procedure was recently changed to reflect the revised COE ordinance requirement that in all cases, once the COE found probable cause, the matter was set for final hearing within 120 days.
- Section 5.9's language made section 5.8 irrelevant and inapplicable since it no longer depended on the respondent or the COE.
- Staff had recommended that section 5.8 be deleted in its entirety.

Commissioner Reinhart asked whether section 5.9 should be renumbered to section 5.8 or whether section 5.8 should indicate that it was voided.

Mr. Johnson responded that section 5.10 would need to be renumbered section 5.9 and section 5.9 renumbered as section 5.8 for consistency.

MOTION to approve Rules of Procedure's section E as amended to delete section 5.8's original language, and to renumber the current language in section 5.10 as section 5.9, and section 5.9 as section 5.8. Motion by Bruce Reinhart, seconded by Ronald Harbison, and carried 5-0.

XI. EXECUTIVE DIRECTOR COMMENTS

XI.a.

DISCUSSED: Ethics Awareness Day.

Mr. Johnson commented that the COE was gearing up for Ethics Awareness Day on November 18, 2011. He added that the COE was looking forward to Dr. Fiore's keynote address, and that he was very proud of the COE members.

EXECUTIVE DIRECTOR COMMENTS - CONTINUED

XI.b.

DISCUSSED: Office of Inspector General Accreditation.

Commissioner Harbison stated that IG Steckler had been informed that the Office of Inspector General would be receiving its accreditation, and that it would be announced in several weeks.

XI.c.

DISCUSSED: Next COE Meeting.

Gina Levesque, COE executive assistant, stated that the COE's **December meeting** was rescheduled to **Wednesday, November 30, 2011**.

XII. PUBLIC COMMENTS – None

XIII. Page 4-5

XIV. ADJOURNMENT

At 5:01 p.m., the chair declared the meeting adjourned.

APPROVED:



Chair/Vice Chair