

## COMPLIANCE REVIEW MEMORANDUM

To: Alan Johnson, Executive Director  
From: James A. Poag, Investigator  
Re: A12-003 – Ethics Training Compliance (Town of Jupiter)

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- **Background**

As of June 1, 2011, all municipalities within Palm Beach County came under the jurisdiction of the Palm Beach County Code of Ethics (the Code). Pursuant to Section 2-446 of the Code, each municipal administrator is required to establish, by policy, a mandatory training schedule for all employees and elected/appointed officials to provide them with training on their ethical responsibilities as prescribed by the code. The Commission on Ethics is required to develop and deliver training programs and to coordinate and cooperate with the municipalities to ensure effective and meaningful training of elected/appointed officials and employees. For verification, a training acknowledgment form for each employee, official and advisory board member should be maintained on file by the Human Resources Department for each municipality.

On February 27, 2012, on behalf of the COE, I initiated an audit of the Town of Jupiter (the Town) for ethics training compliance. In order to complete this task, I contacted Mr. Tim McPherson, Director, Town of Jupiter Human Resources Department to schedule an on-site visit to review the training files. On March 6, 2012, I conducted an on-site compliance review of the Town's Ethics Training Acknowledgement Forms. Prior to the start of my review, I was provided with an alphabetical list of all active full-time employees and elected/appointed officials of the Town, which I used to cross reference each Training Acknowledgement Form. My review revealed, as of March 6, 2012, the Town had four hundred thirty three (433) active full-time employees and elected/appointed officials.

- **Scope**

The scope of my activities included a review of all Town of Jupiter full-time employees and elected/appointed officials, required to submit an Ethics Training Acknowledgement Form pursuant to the Code of Ethics. All forms submitted to Human Resources were maintained in a central training file folder alphabetically by last name.

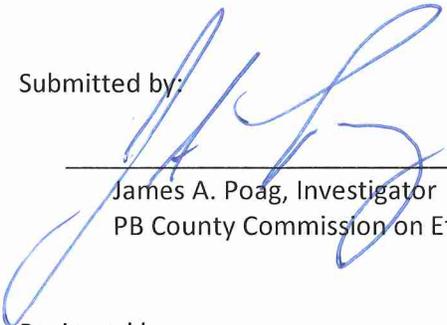
- **Assessment**

On March 6, 2012, a compliance review of the Town of Jupiter for Ethics Training compliance was completed for all full-time Town Employees and elected/appointed officials. The overall assessment indicated the Town of Jupiter had a total of four hundred thirty three (433) active full-time employees and elected/appointed officials. The Town of Jupiter currently has (5) five employees on administrative leave that were not covered under the scope of this review. Those employees will be required to receive training upon returning to active duty. As of this date, the Town of Jupiter is in compliance with the training requirement established by the Palm Beach County Code of Ethics

- Conclusion

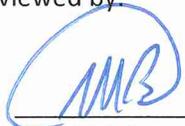
Based on the aforementioned facts, the Town of Jupiter is in compliance with the ethics training requirement for all of its employees and elected/appointed officials.

Submitted by:

  
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James A. Poag, Investigator  
PB County Commission on Ethics

3/22/12  
Date

Reviewed by:

  
\_\_\_\_\_  
(Initials)

3/22/2012  
Date