

COMPLIANCE REVIEW MEMORANDUM

To: Alan Johnson, Executive Director
From: James A. Poag, Investigator
Re: A12-014 – Ethics Training Compliance (Town of Gulf Stream)

- **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 full-time employee and elected/appointed official should be maintained by each municipality.

On May 4, 2012, on behalf of the Commission on Ethics (COE), I initiated a compliance review of the Town of Gulf Stream (the Town) for ethics training compliance. In order to complete this task I contacted Mr. William Thrasher, Town Manager for The Town of Gulf Stream, to schedule an on-site visit to review the training files. I conducted an on-site compliance review of the Town's ethics training acknowledgement forms on May 8, 2012. Prior to the start of my review, I was provided with a departmental alphabetical list of all active full-time Town employees and elected/appointed officials, which I used to cross reference each individual training acknowledgement form. As of May 8, 2012 the Town had 28 active full-time employees and elected/appointed officials.

- **Scope**

The scope included a review of all Town of Gulf Stream full-time employees and elected/appointed officials, required to submit an ethics training acknowledgement form. All forms submitted to the Town Managers Office were maintained in a central training file folder alphabetically by last name.

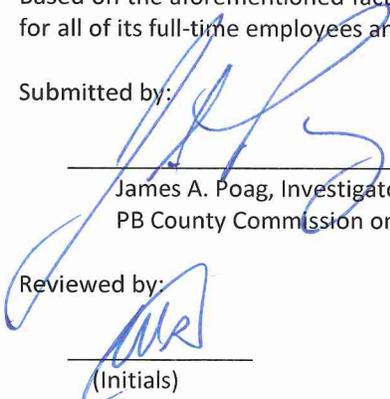
- **Assessment**

On May 1, 2012, a compliance review of the Town of Gulf Stream for ethics training was completed for all full/part-time Town employees and elected/appointed officials. The overall assessment indicated the Town of Gulf Stream had 28 active full-time employees and elected/appointed officials, all of which have been trained according to the reviewed records. As of this date, the Town of Gulf Stream 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 Gulf Stream is in compliance with the ethics training requirement for all of its full-time employees and elected/appointed officials.

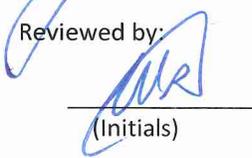
Submitted by:



James A. Poag, Investigator
PB County Commission on Ethics

5/10/12
Date

Reviewed by:



(Initials)

5/10/2012
Date