

## COMPLIANCE REVIEW MEMORANDUM

To: Alan Johnson, Executive Director  
From: Mark E. Bannon, Senior Investigator  
Re: A12-019C – Ethics Training Compliance (Lake Worth Community Redevelopment Agency)

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- **Background**

As of October 4, 2011, the Lake Worth Community Redevelopment Agency (CRA) came under the jurisdiction of the Palm Beach County Code of Ethics (the Code) by contracting with the PBC Commission on Ethics (COE). Pursuant to Section 2-446 of the Code, each public entity within COE jurisdiction 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 these entities 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 the public entity.

On September 11, 2012, on behalf of the Commission on Ethics (COE), I initiated a compliance review of the Lake Worth Community Redevelopment Agency (CRA) concerning appointed board members and employees for ethics training. In order to complete this task I contacted CRA Executive Director Joan Olivia to schedule a review of the Ethics Training Acknowledgment Forms. Prior to the start of my review, I obtained a list all active appointed officials of the CRA and all employees from their website ([www.lakeworthcra.org](http://www.lakeworthcra.org)), which listed seven (7) appointed members of the CRA Board, and six (6) employees. CRA Executive Director Joan Oliva verified this information as correct, and arranged for CRA Project Coordinator Emily Theodossakos to email me copies of the Ethics Training Acknowledgment Forms for each of these thirteen (13) individuals. Copies of all training acknowledgement forms were provided to COE staff by September 13, 2012. On September 13, 2012, I used the board member and employee list to cross reference each individual training acknowledgement form supplied to me from the CRA. The overall assessment indicated that all thirteen (13) CRA board members and employees had been trained, and that the Lake Worth CRA was in compliance with the training requirement established by the Code of Ethics.

- **Scope**


The scope included a review of all thirteen (13) board members and employees of the Lake worth Community Redevelopment Agency required to submit Ethics Training Acknowledgement Forms.

- **Assessment**


On September 13, 2012, a compliance review of the Lake Worth CRA for ethics training was completed for all appointed members and employees. The overall assessment indicated that the Lake Worth CRA had thirteen (13) appointed board members and employees, all of which have been trained according to the reviewed records.

- **Conclusion**

Based on the above information, the Lake Worth Community Redevelopment Agency is in full compliance with the Palm Beach County Code of Ethics training requirement for appointed board members and employees.

Submitted by:   
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Mark E. Bannon, Senior Investigator  
PB County Commission on Ethics

  
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Date

Reviewed by:   
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(Initials)

  
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Date