

## COMPLIANCE REVIEW MEMORANDUM

To: Alan Johnson, Executive Director  
From: James A. Poag, Investigator  
Re: A12-025 – Ethics Training Compliance (Town of Palm Beach Shores)

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

On September 11, 2012 on behalf of the Commission on Ethics (COE), I initiated a compliance review of the Town of Palm Beach Shores (the Town) for ethics training. In order to complete this task I contacted Ms. Mary Miles, Town Clerk, via email. I requested an alphabetical list of all active full-time and regular part-time Town employees, elected/appointed officials, and copies of each individual Ethics Training Acknowledgement Form. Ms. Miles provided the COE with all the requested material. I cross referenced the alpha list of all regular full-time, regular part-time Town employees and elected/appointed officials with the individual training acknowledgement forms. As of September 11, 2012, the Town had 39 active full/part-time employees and elected/appointed officials. At the time of the initial review 8 employees were not in compliance with the training requirement established by the Palm Beach County Code of Ethics. The Town was given additional time to comply with the training requirement as prescribed by the code.

- **Scope**

The scope included a review of all of the Town of Palm Beach Shores full/part-time employees and elected officials, required to submit an ethics training acknowledgement form. All forms submitted to the Town Clerk's Office were maintained in a central file folder in alphabetical order.

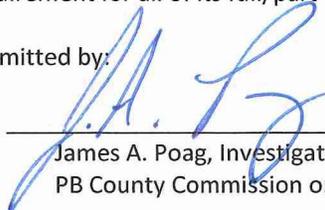
- **Assessment**

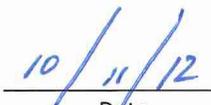
On October 9, 2012, a compliance review of the Town of Palm Beach Shores for ethics training was completed for all full/part-time Town employees and elected officials. The overall assessment indicated the Town of Palm Beach Shores had 39 active full/part-time employees and elected officials, all of which have been trained according to the reviewed records. As of this date, the Town of Palm Beach Shores is in compliance with the training requirement established by the Palm Beach County Code of Ethics.

- **Conclusion**

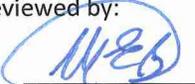
Based on the aforementioned facts the Town of Palm Beach Shores is in full compliance with the ethics training requirement for all of its full/part-time employees and elected officials.

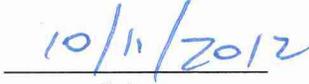
Submitted by:

  
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James A. Poag, Investigator  
PB County Commission on Ethics

  
\_\_\_\_\_  
Date

Reviewed by:

  
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(Initials)

  
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Date