

COMPLIANCE REVIEW MEMORANDUM

To: Alan Johnson, Executive Director
From: James A. Poag, Investigator
Re: A12-027B – Ethics Training Compliance (City of Pahokee Officials)

- **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 6, 2012 on behalf of the Commission on Ethics (COE), I initiated a compliance review of the City of Pahokee (the City) for ethics training. In order to complete this task I contacted Ms. Anika Sinclair, City Clerk, via email. I requested an alphabetical list of all appointed officials, and copies of each individual Ethics Training Acknowledgement Form. Ms. Sinclair provided the COE with all the requested material. I crossed referenced the alpha list of all appointed officials with the individual training acknowledgement forms. As of September 6, 2012, the City had 20 active appointed officials. At the time of the initial review, eight (8) appointed officials were not in compliance with the training requirement established by the Palm Beach County Code of Ethics. The City 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 City of Pahokee's appointed officials required to submit an ethics training acknowledgement form. All forms submitted to the City Clerk were maintained in a central training file folder alphabetically by last name.

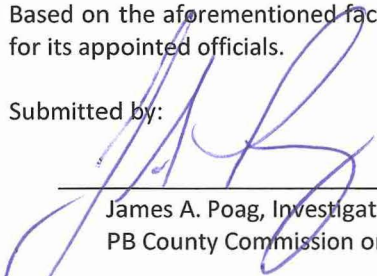
- **Assessment**

On October 17, 2012, a compliance review of the City of Pahokee for ethics training was completed for all appointed officials. The overall assessment indicated the City of Pahokee had 19 appointed officials. As of this date, six (6) appointed officials have not complied with the ethics training requirement. The City of Pahokee is not in compliance with the training requirement established by the Palm Beach County Code of Ethics.

- **Conclusion**

Based on the aforementioned facts the City of Pahokee is not in compliance with the ethics training requirement for its appointed officials.

Submitted by:



James A. Poag, Investigator
PB County Commission on Ethics



Date

Reviewed by:



(Initials)



Date