

COMPLIANCE REVIEW MEMORANDUM

To: Alan Johnson, Executive Director
From: James A. Poag, Investigator
Re: A12-030 – Ethics Training Compliance (City of Atlantis)

- **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 9, 2012 on behalf of the Commission on Ethics (COE), I initiated a compliance review of the City of Atlantis (the City) for ethics training. In order to complete this task I contacted Ms. Mo Thornton, City Manager, to schedule an on-site visit to review the training files. I conducted an on-site compliance review of the City's ethics training acknowledgement forms on September 10, 2012. Prior to the start of my review, I was provided with an alpha list of all active full/part-time City employees and elected/appointed officials, which I used to cross reference each individual training acknowledgement form. As of September 10, 2012, the City had 51 active full/part-time employees and elected/appointed officials.

- **Scope**

The scope included a review of all of the City of Atlantis full/part-time employees and elected/appointed officials required to submit an ethics training acknowledgement form. All forms submitted to the Clerk's Office were maintained in a central training file folder alphabetically by last name.

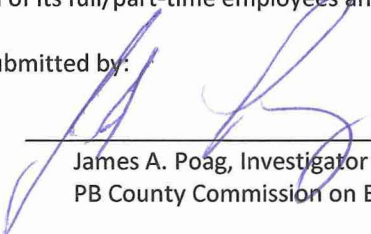
- **Assessment**

On September 10, 2012, a compliance review of the City of Atlantis for ethics training was completed for all full/part-time City employees and elected/appointed officials. The overall assessment indicated the City of Atlantis had 51 active full/part-time employees and elected/appointed officials, all of which have been trained according to the reviewed records. As of this date, the City of Atlantis is in compliance with the training requirement established by the Palm Beach County Code of Ethics.

- **Conclusion**

Based on the aforementioned facts the City of Atlantis is in full compliance with the ethics training requirement for all of its full/part-time employees and elected/appointed officials.

Submitted by:



James A. Poag, Investigator
PB County Commission on Ethics



Date

Reviewed by:



(Initials)



Date