

## COMPLIANCE REVIEW MEMORANDUM

To: Mark E. Bannon, Executive Director  
From: Anthony C. Bennett, Investigator  
Re: A15-019 – Ethics Training Compliance (Town of Briny Breezes)

---

- **Background**

As of June 1, 2011, all municipalities within Palm Beach County are under the jurisdiction of the Palm Beach County Commission on Ethics and subject to the 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 participate in refresher 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.

- **Scope**

The scope included a review of all Town of Briny Breezes (Town) employees and elected/appointed officials required to submit an ethics training acknowledgement form. Based on the Town Policy and Procedure Manual/Resolution 2014-20 (dated April 25, 2013) all public elected officials, employees, volunteers, service board members and contracted employees must receive initial Code of Ethics training within sixty (60) days of employment or appointment and throughout the course of employment. All forms were maintained in a central training file alphabetically by last name on an internal database spreadsheet.

- **Assessment**

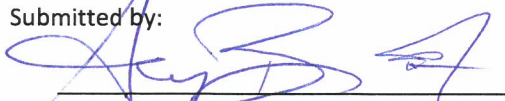
On Wednesday, December 2, 2015, on behalf of the Commission on Ethics (COE), I initiated a compliance review of Briny Breezes for ethics training compliance. In order to complete this task I contacted Mr. Steve Cooper, Briny Breezes Deputy Town Clerk, to schedule a review of the ethics training files. Mr. Cooper advised the city keeps all ethics training records in a centralized folder in the town administrative office. He advised due to small amount of employees and officials, it would be easier to mail all completed forms and a listing of all officials and employees to me.

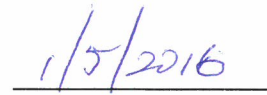
On Friday, December 18, 2015, I received the email from Mr. Cooper and subsequently completed a review of the ethics training forms for all listed employees and officials. As of that date, the Town had thirteen (13) active employees and elected/appointed officials. Upon review of the records, all employees and elected/appointed officials have been trained.

- **Conclusion**

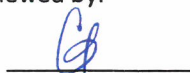
The Town of Briny Breezes is in full compliance with the ethics training requirement for all of its employees and elected/appointed officials.

Submitted by:

  
\_\_\_\_\_  
Anthony C. Bennett, Investigator  
PB County Commission on Ethics

  
\_\_\_\_\_  
Date

Reviewed by:

  
\_\_\_\_\_  
(Initials)

  
\_\_\_\_\_  
Date