

## COMPLIANCE REVIEW MEMORANDUM

To: Alan Johnson, Executive Director  
From: James A. Poag, Investigator  
Re: A12-035B – Ethics Training Compliance (Town of Lantana)

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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 9, 2012 on behalf of the Commission on Ethics (COE), I initiated a compliance review of the Town of Lantana (the Village) for ethics training. In order to complete this I contacted Ms. Crystal Gibson, Town Clerk, to schedule an on-site visit to review the training files. I conducted an on-site compliance review of the Village's ethics training acknowledgement forms on September 11, 2012. Prior to the start of my review, I was provided with an alpha list of all active Town elected/appointed officials, which I used to cross reference each individual training acknowledgement form. At the time of the initial review, three (3) appointed officials had not received training. The Village was given additional time to comply with the training requirement as prescribed by the code.

- **Scope**

The scope included a review of all 32 of the Town of Lantana 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.

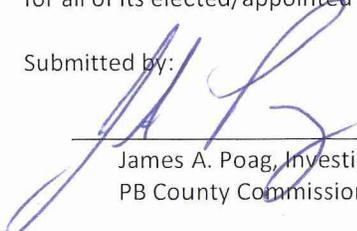
- **Assessment**

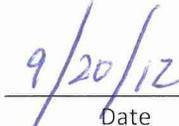
On September 19, 2012, a follow-up compliance review of the Town of Lantana Ethics Training Program was completed for all Village elected/appointed officials. The overall assessment indicated the Town of Lantana had a total of 32 elected/appointed officials. As of this date, all elected/appointed officials of the Town of Lantana are in compliance with the training requirement established by the Palm Beach County Code of Ethics.

- **Conclusion**

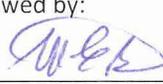
Based on the aforementioned facts the Town of Lantana is in full compliance with the ethics training requirement for all of its elected/appointed officials.

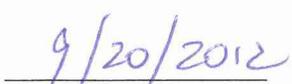
Submitted by:

  
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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