Palm Beach County Ethics Movement

- 2003 – 2010: Arrests/Prosecutions of high level County and City officials.
Commissioner Peter Cruise

Appointed by the President of Florida Atlantic University

Must be a faculty member who teaches, in an ethics related curriculum at a college/university with a campus located in Palm Beach County

Commissioner Sarah Shullman, Chair

Appointed by the Presidents of the PBC Bar Association, F. Malcolm Cunningham Bar Association, and the Hispanic Bar Association

Must be an attorney with experience in ethics regulation of public officials and employees

Commissioner Bryan Kummerlen

Appointed by the president of the PBC Association of Chiefs of Police

Must be a former law enforcement officer with experience in investigating white collar crimes or public corruption

Commissioner Rodney Romano

Appointed by the Palm Beach County League of Cities, Inc.

Must be a former elected official for a governmental entity within Palm Beach County

Commissioner Michael Kridel

Appointed by the president of the Palm Beach Chapter of the Florida Institute of CPAs

Must be a member who possesses at least 5 years experience as a CPA with forensic audit experience
The PBC Commission on Ethics is responsible for

• Monitoring, administering and enforcing the county’s governmental ethics laws
• Providing advisory opinions to employees, officials and vendors who fall within the jurisdiction of the commission
• Providing training and outreach for the benefit of employees and officials, vendors and contractors, nonprofit corporations and other entities that transact business with or are regulated by the county
• Proposing governmental ethics law reform
What the IG Does

- **Fact Finders:**
  - Audit
  - Investigate
  - Review

- **Make Recommendations:**
  - Corrective Actions
  - To make Government better/save money

- **Make Referrals:**
  - Law Enforcement
  - Ethics Commissions

- *Provide Transparency to the Public.*
ONE ETHICS MOVEMENT, SEPARATE CORE FUNCTIONS

Commission on Ethics
- Ethics Complaints
- Advisory Opinions
- Training/Outreach

Inspector General
- Contracts
- Waste/Abuse/Mismanagement

State Attorney
- Criminal Prosecution

Florida Atlantic University
LeRoy Collins Public Ethics Academy
Common Principles Between OIG and the COE

Provide independent oversight of County and Municipal operations;

Detect and prevent fraud, waste, mismanagement, misconduct, and other abuses by elected and appointed officials and employees, agencies and instrumentalities, contractors, their subcontractors and lower tier subcontractors, and other parties doing business with the county or a municipality and/or receiving county or municipal funds;

Promote economy, efficiency and effectiveness in government; and

Conduct audits and investigations of, require production of documents from, and receive full and unrestricted access to the records.
### OIG Dashboard

**What Have We Done / What Are We Doing?**  
6/28/2010 - 3/31/2018

<table>
<thead>
<tr>
<th><strong>We Listen</strong></th>
<th><strong>We Make Government Better</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>8,674 Hotline / Office Calls</td>
<td>688 Recommendations / Corrective Actions</td>
</tr>
<tr>
<td>2,189 Correspondences</td>
<td>93% Management Acceptance Rate</td>
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</tbody>
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**Guard and Save Taxpayers' Dollars**

- $42,695,140 Found in **Questioned** Costs
- $2,190,413 Found in **Identified** Costs
- $21,555,250 Discovered in **Avoidable** Costs

**We Work With Others**

- 131 Referrals to Law Enforcement or Ethics Commissions
COE Dashboard

- Gift Law: 73%
- Misuse of Office: 9%
- Voting Conflicts: 3%
- Other: 4%
- Corrupt Misuse: 11%
Surviving an Audit or Investigation

- IG perspective: audit process
- Focus is organization or process, not individual
- Credibility
  - Both sides need this
- Some, but not all, interviews are recorded
- Don’t worry, unless you are guilty
  - Then see last item below
- Openness is critical on both sides
  - Avoid nothing to see/waste of time
Assume auditors have done research beforehand
- Much research is done online in advance
  - Google, Facebook, etc.
Tell auditor when you don’t know the answer—don’t make one up
If guilty, but unintentional, own up
If guilty and intentional, seek legal counsel
COE perspective: investigate people
- Focus is on individual—a complaint has been received
- All interviews are recorded
- Most infractions are failure to disclose
- Intent is critical; was this an honest oversight?
TOP TEN ETHICS RULES

Employees, Officials, and Advisory Board Members

Need to Remember About the Code of Ethics
1. **ALWAYS… ASK FIRST, ACT LATER**

**GIFTS**

2. You may not accept more than $100 per year in gifts from a lobbyist, principal or employer of a lobbyist or person or entity that does business with your employer.

3. Gifts from persons or entities which total more than $100 per year, other than those prohibited above, must be reported on a form. There are 11 gift exceptions. Immediately refuse or return gifts which are prohibited.
USE OF OFFICIAL POSITION

4. You may not use your official position to give a special financial benefit to yourself, broadly defined family members, an outside employer or business and other defined entities, or “corruptly” use your authority for any person’s benefit.

5. You may not contract with, or do business with, your employer. There are 5 exceptions.

6. Travel expenses, given by persons or entities who are vendors or bidding to be vendors of your governmental employer are prohibited unless waived by your governing body, or unless they are from another governmental entity.
OUTSIDE EMPLOYMENT

7. Generally, subject to your employer’s rules, you may work for an outside employer that does not do business with your county or municipal employer. It may even be permissible to work part-time for an outside employer that does do business with your employer, if certain conditions are met.

VOTING CONFLICTS

8. Officials and advisory board members may not participate in and vote on matters which give a special financial benefit to themselves, or those within in a chain of relationship(s).
MISCELLANEOUS

9. You may not use “inside information” to benefit yourself or others. You must be honest in statements made on your employment application. If you have hiring authority, or the ability to advocate to one who does, you may not hire, or promote the hiring of, a broadly defined family member.

10. The Code of Ethics imposes other restrictions on lobbyists, advisory board members and the activities of certain employees after they leave employment.
Investigations Division FAQs
Click a question to see the answer.

What is the Inspector General Investigations Division and what does it do?

What kinds of reports of fraud, waste or abuse are investigated?

Do you investigate anonymous reports of fraud, waste or abuse?

Do you investigate all reports of fraud, waste or abuse involving government employees?

How do I know if my report of fraud, waste or abuse will be investigated?

As an employee, how do I know if I am under investigation?

As a witness, what should I expect when I am called by an OIG investigator?

If I am under investigation, what are my rights? Do I need a representative?

Describe who responds to the findings in an investigative report.

How do I report fraud, waste or abuse relating to a government or contract employee?
What to Expect When Contacted by OIG Staff

What to Expect When Contacted By INVESTIGATIVE Staff PDF

What to Expect When Contacted By CONTRACT OVERSIGHT Staff PDF

What to Expect When Contacted By AUDIT Staff PDF

Find your entity's policy for contacting the Office of Inspector General
For more detailed information:

LeRoy Collins Public Ethics Academy

www.fau.edu/lcpea

PBC Inspector General

www.pbcgov.org/oig

PBC Commission on Ethics

www.palmbeachcountyethics.com