



## PUTNAM COUNTY BOARD OF ETHICS

Robert C. Bickford, *Chair*  
Patricia Santamarena, *Vice Chair*    Alfonso Lotrecchiano, *Secretary*  
Kathleen F. Delamere    Paul Eldridge

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### ANNUAL REPORT TO THE COUNTY LEGISLATURE AND COUNTY EXECUTIVE

Pursuant to §55-22 of the Putnam County Code of Ethics and Financial Disclosure Law

Under §55-22 of the Putnam County Code of Ethics and Financial Disclosure Law, Chapter 55 of the Code of Putnam County, the Board of Ethics is required to submit, prior to March 15 of each year, a report to the County Executive and the Legislature of the Board's activities in the preceding year.

During 2012, the Board of Ethics met six times. All meetings were open to the public (except for executive sessions to review disclosure statements and consider complaints and requests for advisory opinions).

The following were the principal activities of the Board during 2012:

- The Board followed up a 2011 inquiry to the County Attorney regarding the responsibility and appropriate action of the Board if the Board becomes aware of facts that might constitute a conflict of interest. The Board is awaiting clarification of this issue.
- The Board reviewed a matter involving a possible violation of a village code of ethics. The County Attorney's office advised the Board that, under the County Code of Ethics, the Board did not then have power to act with respect to officers or employees of local entities. Following receipt of that advice, the Board, with the advice and assistance of the County Attorney's office, proposed amendments to the Code to make it clear that the County Board has such powers and duties "as shall be provided by or pursuant to Article 18 of the General Municipal Law of the State of New York, or any other applicable law." The proposed amendments were enacted (Local Law 15 ) and are now part of the Code.
- The Board received and considered a complaint alleging violations of the Code of Ethics; on advice of the County Attorney, the matter was referred to outside counsel for investigation and advice (Legislative approval was obtained to retain such outside counsel). The matter continues to be pending.
- The Board responded to requests for advisory opinion from two County officers or employees with respect to their outside employment.

- The Board worked with the County's IT Department to enable electronic submission and determination of the completeness of annual financial disclosure forms. It is expected that this will be implemented with the submissions in 2013.

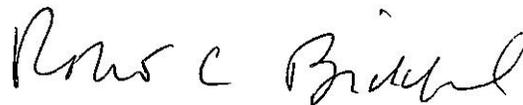
### **Annual Financial Disclosure Statements**

Under the Code, one of the Board's primary responsibilities is to review the annual financial disclosure statements filed by County officers and employees. The review is to assure that the filed forms are complete and responsive on their face to the requirements of the law. The Board's review is done in executive session. The following is the record of Financial Disclosure Forms for 2011 reviewed and accepted or returned for clarification or completion during 2012:

February	Accepted 56 forms
April	Accepted 47 forms
May	Accepted 40 forms
July	Accepted 24 forms
August	Accepted 14 forms
November	Accepted 7 forms

Attached hereto is a report listing the county officers and employees who were required to file annual disclosure statements in 2012 but did not do so, or who filed incomplete statements, which includes information as to prior years' reports. Pursuant to §55-9(B), any County officer or employee who fails to file a true, complete and accurate disclosure statement may, upon recommendation by the Board of Ethics to the County Legislature, be subject to civil penalty of up to \$100. Pursuant to this provision, the Board of Ethics is in the process of adopting procedures to provide for appropriate due process prior to making recommendations with respect to imposition of the civil penalty.

Dated: January 16, 2013



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