

Suffolk County Board of Ethics
Suffolk County, New York

Annual Report

2013



Robin L. Long, Esq.

Chair

Linda A. Spahr, Esq.

Vice Chair

Richard F. Halverson, Ph.D.

Heather M. Palmore, Esq.

Members

Samantha Segal, Esq.

Executive Director

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Dated March 13, 2014

Submitted to: Suffolk County Executive

Submitted to: Suffolk County Legislature

MISSION STATEMENT

“The Mission of the Suffolk County Board of Ethics is to practice and promote ethical literacy and conduct in government through training, transparency, and trust. In order to accomplish the Mission, the Suffolk County Board of Ethics shall maintain confidentiality, adhere to its own Code of Ethics, engage in outreach and training of public officials and employees, and recommend new laws to advance the Mission of ethical compliance.”

**MESSEGE FROM THE CHAIR OF THE SUFFOLK COUNTY BOARD OF ETHICS
ROBIN L. LONG, ESQ.**

The Suffolk County Board of Ethics would like to recognize the ongoing dedication of the County Legislature, the Offices of the County Executive, County District Attorney, and the County Law Department in establishing new standards of independent ethical government.

In 2013, the Board of Ethics far exceeded their preliminary goals. As to trainings, the Board provided Ethics training at nine in-person lectures with employee attendance from 24 Suffolk County Departments. As the legal custodian of the County Annual Disclosure Statements, the Board also received and reviewed 519 Financial Disclosure Statements, with 100% employee filing. As the Board strives for strict public disclosure through the current laws, the Board commenced adjudication proceedings with respect to all late filers of Financial Disclosure Statements.

We welcome all interested persons to provide us with suggestions, to visit our webpage, and to attend the public portion of our regularly scheduled Board meetings.

Respectfully Submitted,

Robin L. Long, Esq.
Chair of the Suffolk County Board of Ethics

**ADMINISTRATION STATEMENT FROM THE EXECUTIVE DIRECTOR
SAMANTHA L. SEGAL, ESQ.**

Through the Suffolk County Charter Law to ensure the independence and integrity of the County ethics process, the Suffolk County Legislature and County Executive have taken extraordinary measures to establish a system that provides the public with transparency, independence, and protocols.

In 2013, the Administration of the Suffolk County Board of Ethics accepted this charge with not only due diligence and responsibility, but also with a level of heightened responsiveness for the citizens of Suffolk County. As the Board develops new initiatives for public education and government safeguards, the Administration is dedicated to being accessible to the public and public servants so that they can be heard by the Board with process. The Administration strives to serve the public, and the public servants of Suffolk County, in a manner that is systematic, accountable, and approachable.

I welcome all interested persons to provide us with suggestions and to attend the public portion of the Board's regularly scheduled Board meetings.

Respectfully Submitted,

Samantha L. Segal, Esq.
Executive Director of the Suffolk County Board of Ethics

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ATTACHMENTS AND EXHIBITS

Exhibit 1:	2014 Budget
Exhibit 2:	Part Time Staff Attorney Civil Service Job Duties Statement
Exhibit 3:	New York Bar Association Continuing Legal Education Accreditation
Exhibit 4:	Board Member Reference Booklet that includes 2013 Suffolk County Board of Ethics Policies, Rules, and Resolutions
Exhibit 5:	2013 FOIL Subject Matter Index
Exhibit 6:	2013 Google Analytic Website Reports

EXECUTIVE SUMMARY

In 2013, the Suffolk County Board of Ethics convened 23 times from January 1, 2013 through December 31, 2013. During the course of the year, the Board's four major initiatives were executed: 1) Suffolk County Annual Financial Disclosure 2) Conducting Ethics Trainings 3) Rendering Advisory Opinions, and 4) Commencing Investigations/Adjudications.

I. Annual County Financial Disclosure

The Board received and reviewed 519 Financial Disclosure Statements, with 100% employee filing. The Board determined that current County disclosure law designates the Board as the legal custodian for 20 categories of filer. The Board also determined that the current disclosure law does not designate the Board as the legal custodian for the following categories of filers: County employees who are no longer employed as of the filing date, Town Political Leaders, and employees of Suffolk Regional Off-Track Betting Corporation.

II. Ethics Trainings

With respect to Ethics Trainings, the Board far exceeded the 2013 statutory requirement of one training seminar. In total, the Suffolk County Board of Ethics provided trainings at nine in-person lectures with a total of 153 persons with employee attendance from 24 Suffolk County Departments.

III. Advisory Opinions

The Board received 22 written requests for Advisory Opinions regarding the Suffolk County Ethics Laws. Of these, 14 received a formal written Advisory Opinion, 1 the Board found no jurisdiction, 2 the Board found that the question posed was not ripe for analysis, 4 were still in the process of fact-finding, and 1 deemed administratively inactive as it lay dormant for non-responsiveness to fact finding for more than 90 days.

IV. Investigations/Adjudications

The Suffolk County Board of Ethics received 8 complaints that the Board found to have no reasonable cause to allege a violation of the Suffolk County Ethics Laws. The Suffolk County Board of Ethics received no complaints that passed the reasonable cause threshold.

The Board commenced actions against 49 late Financial Disclosure Filers. 10 hearings were concluded in 2013 resulting in 5 violations being sustained with fines, 2 sustained without fine, 2 adjournments, and 1 dismissal. The remaining hearings were calendared for 2014. To date, all matters have been resolved by the adjudication by mail calendar. Approximately 25% of all cases have been counsel represented for the respondent and 75% pro se.

The Boards recommended legislation and code review are located at pages 13-14 in this Annual Report.

1. INTRODUCTION

This report covers the time period of January 1, 2013 through December 31, 2013.

The Suffolk County Board of Ethics was established pursuant to Local Law No. 56-2011, which became effective in March 2012. The Board was fully formed in the summer of 2012, and has established its offices in Yaphank.

Article XXX of the Suffolk County Charter vests in the Board of Ethics the authority and responsibility to:

- 1) Provide ethics training and education to Suffolk County's public servants;
- 2) Render advisory opinions to Suffolk County's public servants on ethics and conflicts of interest issues;
- 3) Make financial disclosure statement forms available to persons required to file pursuant to Chapter 77, Article 2 of the Suffolk County Code, and review such statements; and
- 4) Conduct investigations and hearings to determine if ethics violations have occurred and to impose penalties as authorized by local law.

The Administrative laws governing the Board of Ethics are found at Article XXX of the Suffolk County Administrative Code. The Suffolk County Code of Ethics is found at Chapter 77, Section I, Article I. The Financial Disclosure Law is found at Chapter 77, Section I, Article II of the Suffolk County Code.

This Report reviews the Suffolk County Board of Ethics accomplishments during 2013 under the following headings: 1) Introduction 2) Members of the Suffolk County Board of Ethics 3) Budget 4) Independent Contractor: General Counsel 5) Training and Education 6) 2013 Legislation 7) Board Policies 8) Code of Ethics Review 9) Financial Disclosure Statements/ Adjudications 10) Advisory Opinion Requests 11) Complaints 12) Freedom of Information Law 13) Administration 14) Information Technology 15) Press Articles 16) 2014 Initiatives.

2. MEMBERS OF THE SUFFOLK COUNTY BOARD OF ETHICS

Appointed by varying authority, the Board members serve four year terms. Under the Suffolk County Charter, the Board must consist of five members. Two of the members are appointed by the County Executive, one by the Presiding Officer of the Legislature, one by the Majority Leader of the Legislature, and one by the Minority Leader of the Legislature. All appointments are subject to approval by the Legislature and are volunteer. Members are paid a \$200 stipend per meeting. In 2013, the Suffolk County Board of Ethics convened 20 times from February 16 through December.

Members

Thomas A. Isles, AICP - Term 3/27/2012-3/26/2016 (Resigned 9/6/2013)

- Appointed by Presiding Officer
- Former Director Suffolk County Planning Department
- Former Deputy Director of Planning Cayman Islands
- Former Commissioner of Planning and Development Town of Islip

Heather M. Palmore, Esq. - Term 3/27/2012-3/26/2015

- Appointed by Majority Leader
- Partner: Conway, Farrell, Curtin & Kelly PC.

Richard F. Halverson, Ph.D. - Term 4/6/2012 – 4/5/2014

- Appointed by County Executive
- Former Deputy Comptroller City of New York
- Former Executive Vice President St. Francis College
- Former Deputy Chancellor City of New York Board of Education
- Member of Budget and Finance Committee of Town of Southampton

Robin L. Long, Esq.- Term 6/26/2012-6/25/2014

- Appointed by County Executive
- Law Office of Robin L. Long

Linda A. Spahr, Esq. - Term 6/26/2012-6/25/2015

- Appointed by Minority Leader
- Former Chief Environmental Crime Unit Suffolk County District Attorney's Office
- Former Deputy Bureau Chief Suffolk County Law Department

3. BUDGET

Budget

The 2013 budget was under expended due to the outside counsel and ethics trainer being retained in July 2013. The six month total for Legal Services amounted to \$31,155.12 and \$15,905.54 for training services.

The 2014 Approved Budget is attached hereto as Exhibit “1 “. The Board is continually assessing the needs of additional resources and staff including investigators, staff counsel, and administrative support. The Board requested a part-time departmental attorney position at the rate of \$34,439 for 2014. The intended duties for this position include tribunal hearing document preparation, Board representation at tribunal hearings, pleadings, FOIL officer, and staffing of ethics hotline. (Exhibit “2” Submitted Job Duties Statement). This request was initially approved by the County Executive’s Office, but was not adopted in the final budget. The Board will be requesting this position again for 2015.

Debts

The Agency does not have any outstanding debts. All liabilities are paid for through the Suffolk County approved budget.

4. INDEPENDENT CONTRACTOR: GENERAL COUNSEL

The Suffolk County Board of Ethics conducted a search for General Counsel via an “RFQ” process. The Suffolk County Law Department provides the Board representation with respect to preparing and executing procurement for all County contracts.

The Board advertised the “RFQ” in the Smithtown Messenger, The Suffolk County Lawyer, Touro Law School, Hofstra Law School, and St. John’s Law School. The Executive Director and Board Members also contacted firms with the required practice areas which resulted in 22 law firms requesting the “RFQ”. Six firms responded, four of six were interviewed for General Counsel. The Board qualified one firm located in Suffolk County, Ingerman Smith LLP, through this process. The three senior lawyers assigned to work on this file are Partner: John Gross, Esq., Partner: Christopher Clayton, Esq., and Of Counsel: Julie Torrey, Esq. Mr. Gross is an experienced litigator with clients inclusive of government entities and private sector for over 30 years and is the former President of the Suffolk County Bar Association. Mr. Clayton is an experienced litigator and served as a Suffolk County Assistant District Attorney for eight years where he received the Suffolk County District Attorney’s Distinguished Trial Advocacy Award. Ms. Torrey is an experienced litigator with a practice background inclusive of municipalities and private sector clients in federal and state litigation, including employment discrimination litigation, administrative proceedings and Civil Service Law Section 75 disciplinary proceedings.

5. TRAINING AND EDUCATION

In August 2013, by way of “RFQ” procurement, the Suffolk County Board of Ethics retained Ingerman Smith, LLP as the Independent Training Consultant.

The Board far exceeded the 2013 statutory requirement of one training seminar. In total, the Suffolk County Board of Ethics provided trainings at nine in-person lectures with a total of 153 persons with employee attendance from 24 Suffolk County Departments.¹

Additionally in 2013 the Board was successful in securing New York State Bar Association Continuing Legal Education credits for its “Suffolk County Ethics Laws” lecture presentation. As an approved provider, the Suffolk County Board of Ethics provided Continuing Legal Education credits to 23 attorneys employed by Suffolk County (Exhibit “3” New York State Bar Association Accreditation attached).

The Board has distributed the Code of Ethics Booklet to approximately 300 employees and the Suffolk County Print Shop provided 550 copies upon direct request of Suffolk County Civil Service. The Board is working with the Suffolk County Information Technology Department to create a self-certifying all employee Ethics power-point. The Board is developing a training schedule that complies with the statute for 2014, an even-numbered year, requiring two training seminars.

Beginning in August of 2013, the Executive Director began presenting at Civil Service New Employee Orientations. This brief overview of the Board of Ethics introduces all new employees as to their obligations under the Suffolk County Ethics Laws and informs them of the Board’s obligation to render all requests with independence and process. In 2013, the Executive Director conducted 4 New Employee Orientation presentations, presenting to a total of 71 new employees. Job titles of persons in attendance included the following: Junior Assistant District Attorneys, Food Service Supervisor, Worker’s Compensation Claims Examiner, School Crossing Guard, Justice Court Clerk, Public Safety Dispatcher, Junior Assistant County Attorney, Medial Records Clerk, Grants Analyst, Labor Technician, Clerk Typist, Community Organization Specialist, Forensic Scientist, Emergency Complaint Operator, Assistant Election Clerk, and Veterans Service Officer.

¹ County Executive, Legislature, District Attorney, County Attorney, Public Works, Finance & Management, Intergovernmental Relations, Performance Management, Minority Affairs, Youth Bureau, Office for Women, Office for the Aging, Office for People with Disabilities, Labor Relations, Labor, Probation, Traffic and Parking Violations Agency, Social Services, Information Technology, Civil Service, Health, Police, Fire, Rescue and Emergency Services.

In furtherance, in May of 2013, the Executive Director conducted Suffolk County Ethics Laws training to 12 new employees of the Suffolk County Traffic and Parking Violations Agency.

In September of 2013, the Suffolk County Board of Ethics provided two “Suffolk County Ethics Laws” CLE trainings to the Suffolk County Legislature conducted by John Gross, Esq., Robin L. Long, Esq., and Samantha Segal, Esq. These trainings were attended by 29 Suffolk County Legislature employees.

In September of 2013, the Suffolk County Board of Ethics also provided the “Suffolk County Ethics Laws” CLE training to the Suffolk County Law Department conducted by John Gross, Esq., Robin L. Long, Esq., and Samantha Segal, Esq. This training had 12 Assistant County Attorneys in attendance.

In November of 2013, the Suffolk County Board of Ethics conducted Suffolk County Ethics Laws training to Suffolk County Department Heads. In attendance were 26 Suffolk County Department Heads.

6. 2013 LEGISLATION

In 2013, the following two County Laws in the Suffolk County Code of Ethics were amended.

1. Local Law 11-2013 “A Local Law to Revise Suffolk County’s Financial Disclosure Statement.” As per the Legislative Intent of Local Law 11-2013, the purpose of this law is to revise the County’s financial disclosure statement and recommended a number of technical changes to the form which will improve compliance with the Country’s financial disclosure laws.

2. Local Law 28-2013 “A Local Law to Clarify Board of Ethics Authority to Issue Advisory Opinions.” As per the Legislative Intent of Local Law 28-2013, the purpose of this law is to amend the County’s ethics statute to clarify that the County Board of Ethics has the authority to issue advisory opinions to prospective and former County employees and a supervisory official who will supervise a prospective public servant or who supervised a former public servant.

7. BOARD POLICIES

In 2013 the Suffolk County Board of Ethics enacted the following Board policies and procedures 1) Rules, Regulations and Procedures of the Board 2) Adjudication By Mail Procedures 3) In-Person Hearing Procedures 4) Ethics Violation Complaint Procedures 5) Financial Disclosure Statement Office in-Take Procedures 6) Extension Application for Financial Disclosure Statement 7) Freedom of Information Procedures. Attached hereto is a complete record of all such policies (Exhibit “4”).

8. LEGISLATIVE RECOMMENDATIONS AND CODE REVIEW

Legislative Recommendations

1. The Suffolk County Code, § 77-10, sets forth those persons required to file Financial Disclosure Statements. As the law is currently written, the Board has determined that persons who are no longer in a designated position as of the filing date, due to termination, retirement, resignation or transfer, are not required to file. In some jurisdictions, required filers who leave their employment are required to file a Financial Disclosure Statement before receiving their final paycheck, even if they leave prior to the designated filing date. The Board recommends that the Legislature consider whether such a provision would be appropriate to afford the public full financial disclosure from persons who held positions of governmental trust in the preceding calendar year.

2. In addition to those persons required to file Financial Disclosure Statements pursuant to §77-10 of the Code, there are persons required to file Financial Disclosure Statements pursuant to other laws. Those persons include Farmland Committee members, Long Island regional Planning Council members and members of certain local public authorities. As the law is written, the Board has no enforcement authority against a person whose filing requirement is imposed by one of these other laws.

The Board recommends that §77-16 of the Code be amended as follows:

“(A) Any person required to file a statement pursuant to this article, or any other provision of law, who has not so filed at the end of one week after the required filing date shall be subject to a fine of not less than \$250 or more than \$1000. In determining the amount of the fine, the Board shall consider factors, including, but not limited to, the person’s failure in prior years to file a report in a timely manner, and the length of delay in filing. The Board may waive a fine entirely if a person establishes that the failure to file a report in a timely manner was due to illness, injury or other hardship.”

3. The Suffolk County Charter, § C30-2(F) provides for compensation to members in the amount of \$200 per meeting, with a limit of \$400 per month. If the Board meets only one time in a month, but three times the next month, members may only be compensated for three of the four meetings. A change in the law would provide more flexibility to the Board in satisfying the ebbs and flows of its statutory workload—including tribunal hearings, deliberations, advisory opinions, policy matters and privacy requests. As the original Legislative intent was to provide to Board member compensation for all duly authorized meetings, the scheduling change will have zero impact on the authorized budget.

The Board recommends that §C30-2 of the Charter be amended as follows:

“(F)” Members shall receive compensation of \$200 for each Board meeting they attend; such compensation shall not exceed ~~\$400 per month~~ \$4800 per year. In no event shall the Board meet less frequently than once per month.”

Code Review

1. The Suffolk County Code, §77-4 contains restrictions on activities that may be engaged in by political party officers. A political party officer, as defined in §77-1 of the Code of Ethics, is a chairperson of any County political party committee elected pursuant to §2-2112 of the New York Election Law or the chairperson of any duly constituted Town political party committee.

Suffolk County Code §77-10, which sets forth persons who must file Financial Disclosure Statements provides at subdivision (A) that “chairpersons of County political party committees” must file. As written, the Board has determined that this section does *not* require that chairs of Town political party committees file Financial Disclosure Statements. The Board has determined that prior county law required every political party officer to file Financial Disclosure Statements.

9. FINANCIAL DISCLOSURE STATEMENTS/ ADJUDICATIONS

Financial Disclosure Statements

Pursuant to § A30-4, Financial Disclosure, the Board shall make financial disclosure statement forms available to all persons required to file pursuant to the requirements of Chapter 77, Part 1, Article II, of the Suffolk County Code. The Board shall review and maintain these statements and otherwise administer and enforce the financial disclosure requirements in accordance with the provisions of Chapter 77, Part 1.

In 2013 all required County employees filed. The Board enacted hearing procedures for late financial disclosure filers. All late filers received Notices of Violation. The Board served 49 Notices of Violation for the 2013 filing year, 10 hearings were concluded in 2013 and the remaining in the first quarter of 2014.

Financial Disclosure Statement Filings

<i>Filer Designation</i>	<i>Total Required to File</i>	<i>Total Filed</i>
County Employees	385	385
Non County Employee Filers	115	110
Elected Officials	24	24
TOTAL	524	519

Late Financial Disclosure Statement Adjudication By Mail Hearings

<i>Number of NOV's Issued</i>	<i>Hearings Conducted in 2013</i>	<i>Board Determinations</i>
49	10	2- Adjourned
		1- Dismissed
		5 - Sustained with fine
		2 - Sustained fine waived

Adjudications

The Suffolk County Board of Ethics established procedures with process to conduct hearings. In doing so, the Board developed two lines of adjudication calendars.

The first calendar is adjudication by mail proceedings. This method affords all persons charged with violating the County Ethics Laws an opportunity to be heard. In doing so, these proceedings notice all persons pursuant to the law, and permit respondents to submit admissions or defenses in paper on their own behalf or represented by counsel. These hearings are digitally recorded to preserve all respondents to have a full record available for appeal and are conducted in Executive Session. The votes of such hearings are all memorialized in hard copy and available directly to the respondents. All such procedures are available on the Suffolk County Board of Ethics webpage.

The second calendar is adjudication by in person hearings. All persons charged with any provision of the County has the right to elect an in person hearing and the Board has the right to calendar an in-person hearing for any matter. In doing so, these proceedings notice all persons pursuant to the law, and permit respondents to submit admissions or defenses on their own behalf or represented by counsel. These hearings are digitally recorded to preserve all respondents to have a full record available for appeal and are conducted in Executive Session. The votes of such hearings are all memorialized in hard copy and available directly to the respondents. All such procedures are available on the Suffolk County Board of Ethics webpage.

To date, all matters have been resolved by the adjudication by mail calendar. Approximately 25% of all cases have been counsel represented for the respondent and 75% pro se. The Executive Director assists pro se respondents in being apprised of Board procedures and acts as a liaison for the Respondent's to the Board. General Counsel to the Board reviews all papers submitted by Respondent's Counsel and advises the Board on adversarial matters.

10. ADVISORY OPINION REQUESTS

The Suffolk County Board of Ethics received 22 requests for Advisory Opinions in 2013. The Board maintained compliance with the statutory provisions under the Suffolk County Charter and all Advisory Opinions were rendered within 45 days of completed fact finding. Upon determining a requestor has standing, a fact finding is commenced from which the Board renders their final Advisory Opinion.

<i>Month</i>	<i>Number</i>	<i>Action Taken</i>
January	1	No Jurisdiction
February	4	Rendered Rendered Rendered Question not Ripe
March	1	Rendered
April	2	Rendered Rendered
May	1	Rendered
June	1	Administratively Inactive ²
July	0	N/A
August	0	N/A
September	2	Rendered Rendered
October	4	Rendered Rendered Rendered Question not Ripe
November	4	Rendered Rendered Fact finding pursuant to §A30-3(C)in Process/ Pending Fact finding pursuant to §A30-3(C)in Process/ Pending
December	2	Fact finding pursuant to §A30-3(C)in Process/ Pending Fact finding pursuant to §A30-3(C)in Process/ Pending
Total:	22	

² Board Rule 2013:4 All Advisory Opinion requests that are dormant due to no requestor response to the Board's fact-finding inquiry are administratively inactive without prejudice.

11. COMPLAINTS

The Board has limited jurisdiction to process complaints as to only violations of Chapter 77, Part 1, Article I, of the Suffolk County Code or other applicable provision of law governing conflicts of interest by a public servant or former public servant. As such, all complaints alleging offenses that are outside of the Board's jurisdiction are rejected.

The Suffolk County Board of Ethics received 8 complaints that the Board found to have no reasonable cause to allege a violation of the Suffolk County Ethics Laws. The Suffolk County Board of Ethics received no complaints that passed the reasonable cause threshold therefore no investigations were commenced. The Ethics Violation Complaint Procedure and Form are available to the public on the Suffolk County Board of Ethics webpage.

12. FREEDOM OF INFORMATION LAW

The Board received and fulfilled 48 Freedom of Information Law ("FOIL") Requests. Only 8 of these were for records that the Suffolk County Board of Ethics is the designated legal custodian. The 40 FOIL Requests which were served on the Board in error were responded to in compliance with the FOIL legal mandates. The Board maintains a FOIL Subject Matter Index that categorizes all materials, exemptions, and protocols. The Board also maintains the filed Elected Officials "Truth and Honesty in Government Lobbying Sworn Statements." (Exhibit "5" – 2013 Subject Matter Index) ³

³ 2013 FOIL Subject Matter Index Attached

13. ADMINISTRATION

Location

The Suffolk County Board of Ethics is located at 335 Yaphank Avenue Yaphank, New York 11980. In 2014, the Board secured surplus furniture for the office from the John J. Foley Skilled Nursing Facility.

Document Due Diligence and Cataloging

The Suffolk County Board of Ethics staff exercises daily due diligence and audits for document retention and accuracy. Set forth below are the categories of documents which undergo cataloging at the Board’s office:

Document Type	Management System
Adjudication Pleadings	Separate physical and electronic file folders are maintained for each individual, organized by batch number and name (i.e.: Batch 1 - John Doe).
Notice of Violation	Separate physical and electronic file folders are maintained within each individual’s physical and electronic file containing all Notices of Violation served by the Suffolk County Board of Ethics for the 2013 Financial Disclosure Statements where they are grouped by batch number, name, and index number (i.e. Index Number FDS 001/2013).
Orders	Separate physical and electronic file folders are maintained within each individual’s physical and electronic file containing all orders issued by the Suffolk County Board of Ethics for the 2013 Financial Disclosure Statements where they are grouped by meeting date, name, and index number (i.e. Index Number FDS 001/2013).
Advisory Opinions	Separate physical and electronic file folders are maintained for each individual, organized by Advisory Opinion Request number (assigned in order of date of request) and name (i.e.: AO-2013-1 John Doe). An index is maintained as required by the Suffolk County Administrative Code §A30-3 (D). Advisory Opinions are available on the Board’s webpage in redacted (pursuant to §A30-3 (D)) form. Separate physical and electronic file folders are maintained for each individual, organized by Advisory Opinion Request number (assigned in order of date of request) and name (i.e.: AO-2013-1 John Doe). An index is maintained as required by the Suffolk County Administrative Code §A30-3 (D). Advisory Opinions

Advisory Opinions Cont:	are available on the Board's webpage in redacted (pursuant to §A30-3 (D)) form.
Agendas & Minutes	Separate physical and electronic file folders are maintained.
Articles & Publications	Separate physical and electronic file folders are maintained.
Complaints	Separate physical and electronic file folders are maintained for each complaint, organized by complaint number (assigned in order of date of request) and name (i.e.: C-001-2013 John Doe).
Financial Disclosure Statements ("FDS")	FDS Statements are filed in alphabetical order within the applicable Department, Board, Commission, or Agency's file. Each FDS Statement is assigned an FDS number (i.e.: FDS# 001).
2013 Financial Disclosure Statement Workbook	Contains 40 spreadsheets, of those the following are included: Departmentally Organized Index, Alphabetically Organized Index, FDS Distribution, Compliance (FDS Number (i.e.: FDS# 001), filer name, category of filer, filing date, privacy requested, incomplete status, tracks all letters sent to filer, sender/courier, address (if applicable), and receipt type.), Privacy Requests, First Notice- Did Not File, Second Notice- Did Not File, Notice of Violation, and a separate spreadsheet for each Department, Agency, Board, Commission, or Council containing required filers and compliance.
Freedom of Information Law Requests ("FOIL")	Separate physical and electronic file folders are maintained for each FOIL request, organized by FOIL number (assigned in order of date of request) and name (i.e.: FOIL-001-2013 John Doe).
2013 Mail Spreadsheet	Electronic file folders are maintained containing information of all mailings and facsimiles received by the office. Information Entered: Mailing Number, Date, Sender, Sender's Address, Contents, Mail Type, and Tracking Number (if available).
Notices of Public Meetings	Separate physical and electronic file folders are maintained of the Notice of Public Meeting, email to Legislature approved County newspapers, and screenshot of online notice posting on the Board's webpage.
Miscellaneous	Separate physical and electronic file folders are maintained for each miscellaneous document, letter, inquiry, etc., organized by "miscellaneous" item number (assigned in order of date of request) and name (ie: M-001-2013 John Doe).

14. INFORMATION TECHNOLOGY

The Suffolk County Board of Ethics maintains an independent webpage on www.SuffolkCountyNY.Gov. The webpage contains the following:

1. Notices of Public Meetings;
2. Meeting agendas and minutes;
3. Complaint procedures;
4. Advisory opinion procedures;
5. FOIL procedures;
6. Adjudication procedures;
7. Hearing Procedures;
8. Links to Local Laws;
9. Forms;
10. Contact information of the Board;
11. Press Releases;
12. Contracting opportunities with the Board;
13. Annual Reports;
14. Training and educational materials.

The Suffolk County Board of Ethics webpage is maintained and updated on a monthly and as-needed basis. In effort to maintain confidentiality at all points of contact, the Board does not accept complaints or requests for advisory opinions via email. All such correspondence to and from the Board are made by facsimile, US mail, or hand delivery. The Board is currently creating electronic training materials. Google Analytics provides reports as to the usage of the Board's website reporting 1,923 page views in 2013 (Exhibit "6" Google analytic reports").

The Board's initiative to have online Annual Financial Disclosure capabilities is contingent on programming and identity theft measures which can exclusively be provided by the Suffolk County Information Technology Department. At this juncture, the Suffolk County Information Technology Department does not have the software to provide such services for implementation in 2014. The Board has requested that the Suffolk County Print Shop create a fillable PDF file for the Annual County Financial Disclosure form which will be available to all required filers for 2014.

15. PRESS ARTICLES

In 2013, local Newspapers reported articles of interest regarding the Suffolk County Board of Ethics.

16. 2014 INITIATIVES

1. To exceed the statutory requirement of two annual training seminars;
2. Publishing and distribution of the Ethics Plain-Language Guide;
3. Implementation of the “Ethics by Posters” Series;
4. To continue providing all requestors timely advisory opinions;
5. To continue conducting hearings and investigations pursuant to the Suffolk County Ethics Laws;
6. To conduct due diligence first and second level reviews of all financial disclosure statements;
7. To provide members of the public and public servants with ongoing advice and education, pre-emptively and upon request, of the Suffolk County Ethics Laws;
8. Establishing an account with translation service (Language Line) for hearings and the public.