

OFFICE OF INSPECTOR GENERAL PALM BEACH COUNTY



"Enhancing Public Trust in Government"

Audit Report 2021-A-0007

City of Lake Worth Beach Travel

September 13, 2021



OFFICE OF INSPECTOR GENERAL PALM BEACH COUNTY

AUDIT REPORT 2021-A-0007

DATE ISSUED: SEPTEMBER 13, 2021



Inspector General Accredited

"Enhancing Public Trust in Government"

CITY OF LAKE WORTH BEACH TRAVEL

SUMMARY

WHAT WE DID

We conducted an audit of the City of Lake Worth Beach's (City) travel process. This audit was performed as a result of an anonymous complaint we received on February 14, 2019. Based on the complainant's allegation, we initiated a limited scope audit of the City's travel process. Additionally, this audit was in line with the Office of Inspector General, Palm Beach County (OIG) 2019 Annual Audit Plan.

The scope of the audit included overnight travel activities and discretionary spending for the City Commissioners, Mayor, and Manager¹ that occurred during Fiscal Year (FY) 2017 through FY 2019 (October 1, 2016 – September 30, 2019).

We reviewed the complainant's allegation as follows:

Allegation: The City Commissioners (i.e. Commissioners Andy Amoroso and Scott Maxwell) and the City Manager take personal trips paid with City funds.

Our audit focused on (1) addressing the complainant's allegation and determining (2)internal controls whether adequate for travel programs and activities. (3) the control procedures were adequate to ensure that expenditures were for appropriate activities and travel forms were properly reviewed approved. (4) travel expenditures were properly documented and approved to prevent and detect fraud, waste, and abuse. (5) reimbursement rates used were compliance with policies procedures, and (6) the discretionary spending² accounts were documented and approved in compliance with policies and procedures.

WHAT WE FOUND

In relation to the complainant's concern, we found:

The Allegation is not supported: We reviewed all overnight travel activities for the City Commissioners, Mayor, and Manager for proper approval, a documented business purpose, personal and non-employee expenses, and

¹ The audit scope included travel activities and discretionary spending for Commissioners Scott Maxwell, Christopher McVoy, Omari Hardy, Andy Amoroso, and Herman Robinson; Mayor Pam Triolo; and City Manager Michael Bornstein.

² We considered the expenditures made to the City Commissioner and Manager's Promotional Activities Accounts as discretionary (i.e. non-essential) spending. The City staff informed us the City had no ordinances, resolutions, or policies specifically governing the use of the accounts other than those related to food expenses.

documentation that the trip was completed. Although we found most trips were not properly approved, all 101 trips audited had sufficient documentation to support a business purpose for the travel. Our audit disclosed 13 instances of reimbursed personal expenses travelers, totaling \$962.50.3 However, we did not find sufficient documentation to support that the travelers used City funds to take personal trips as stated in the allegation.

Non-Compliance with Written Guidance

We found travel expenditures did not always comply with the requirements of the City's Travel Ordinance, City's Travel Resolution 57-2012 (Travel Resolution), the City Manager Travel Policy (Travel Policy), the Training and Travel Reimbursement Authorization and Procedures, and Purchasing Card Policies and Procedures with respect to approvals, allowed and necessary travel expenses, documentation, and per diem/mileage allowances. This resulted in \$103,473.55 of questioned costs.4 Travel expenditures that included Florida sales tax and travel expenses incorrectly paid to travelers that the City can potentially recoup resulted in identified costs⁵ totaling \$3,242.45. We also identified \$13,602.62 in avoidable costs.6

City Manager Promotional Activities Account Purchasing Card Purchases Lacked Review and Oversight

We found ten (10) of the 42 (26%) Promotional Activities Account expenditures tested, totaling \$982.72, lacked a valid business purpose, sufficient supporting documentation, or both. All ten (10) expenditures were purchases made with the City Manager's purchasing card at local restaurants. These are considered questioned costs because there was a lack of sufficient documentation.

<u>Lack of Written Information</u> Technology (IT) Guidance

This audit included a review of data reliability and integrity of computer systems related to travel activities and discretionary spending. We found that the City did not have written IT policies for any of their IT processes. Lack of written guidance increases the risk of inconsistent operations and unauthorized or inappropriate access to the Citv's computer systems.

Incomplete and Inconsistent Record Keeping

Of the 101 overnight trips identified, 73 (72%) were missing a Training or Travel Authorization and Expense Report Form.

³ These expenses were noted as identified and avoidable costs in Finding 2 under the exception type "Disallowed/Prohibited by Policy".

⁴ Questioned costs are costs or financial obligations that are questioned by the OIG because of: an alleged violation of a provision of a law, regulation, contract, grant, cooperative agreement, other agreement, policies and procedures, or document governing the expenditure of funds; a finding that, at the time of the OIG activity, such cost or financial obligation is not supported by adequate documentation; or, a finding that the expenditure of funds for the intended purpose is unnecessary or unreasonable. As such, not all questioned costs are indicative of potential fraud or waste.

⁵ Identified costs are costs that have been identified as dollars that have the potential of being returned to the entity to offset the taxpayers' burden.

⁶ Avoidable costs are costs an entity will not have to incur, lost funds, and/or an anticipated increase in revenue following the issuance of an OIG report. The maximum period for calculating Avoidable Costs shall typically be three years from the issuance of the OIG report, except in instances where it involves a contract with a specified contract period.

as required by the Travel Procedures. In most cases, the City did not consolidate the required and necessarv documentation and support for the City Manager, Mayor, and Commissioners' travel in a complete and consistent manner. In some cases, the City was not able to provide us with all of the overnight travel supporting documentation. Additionally. we found five (5)expenditures on the general ledger, totaling \$1,853.00 that lacked a supporting receipt or invoice and could not be traced to a travel or training record. These expenditures are considered questioned costs.

Corrective Actions

During the audit, the City implemented a checklist to assist City staff in complying with the City's Travel Resolution, Travel Policy, and Travel Procedures.

Additionally, the City implemented eight (8) IT related policies and procedures during the audit.

WHAT WE RECOMMEND

Our report contains five (5) findings and 11 recommendations. Implementation of the recommendations will (1) assist the City in strengthening internal controls, (2) save approximately \$13,602.62 in future avoidable costs, and (3) help ensure compliance with requirements.

The City concurred and accepted the recommendations.

We have included the City's management response as Attachment 1.

BACKGROUND



The City of Lake Worth Beach was incorporated as City of Lake Worth in 1913. The City borders West Palm Beach to the north and the Town of Palm Beach to the north east at the Intracoastal Waterway and the Atlantic Ocean. The City is a residential community of approximately seven square miles.

The City operates under a Commission–Manager form of government and provides general municipal services, such as, public safety, recreation, public works, as well as, certain enterprise activities such as electric, water, sewer, storm water and waste removal service.

The City Commission is comprised of five (5) members who serve overlapping three (3)-year terms and are elected on a nonpartisan basis by residents of the City. The Mayor is part of the Commission and is elected at-large to serve a three (3)-year term as the presiding officer at City Commission meetings and as the official head of the City for legislative and ceremonial purposes. The City Commission is responsible for passing ordinances, adopting resolutions and other policy directives necessary for the operation of the City, and for appointing the City Manager.

In March, 2019, the City electors voted to change the City's name from the City of Lake Worth to the City of Lake Worth Beach. The City's 2020 population was approximately 38,875.7

The OIG FY 2019 Annual Audit Plan had multiple entities selected for travel audits. Subsequent to releasing the FY 2019 Annual Audit Plan, the OIG received an anonymous complaint regarding the travel of the City's elected officials and City Manager. The OIG selected the City for audit as a result of the complaint.

OBJECTIVES, SCOPE, AND METHODOLOGY

The overall objectives of the audit were to:

- Address the complainant's allegation;
- Determine whether internal controls were adequate for travel programs and activities;
- Determine whether the control procedures were adequate to ensure that expenditures were for appropriate activities and travel forms were properly reviewed and approved;
- Determine whether travel expenditures were properly documented and approved to prevent and detect fraud, waste, and abuse;
- Determine whether reimbursement rates used were in compliance with policies and procedures; and

⁷ http://edr.state.fl.us/Content/population-demographics/data/2020_pop_estimates-Revised-v2.pdf

 Determine whether the discretionary spending accounts were properly documented and approved in compliance with policies and procedures.

The scope of the audit included, but was not limited to, overnight travel transactions and activities and discretionary spending of the City Commission members from October 1, 2016 – September 30, 2019.

The audit methodology included but was not limited to:

- Performing data reliability and integrity assessment of related computer systems;
- Reviewing policies, procedures, and related requirements;
- Reviewing records and reports;
- Performing process walk-throughs and conducting a review of internal controls;
- Interviewing appropriate personnel;
- · Performing data analysis of the population of transactions; and
- Performing detailed testing of selected transactions.

As part of the audit, we completed a data reliability assessment for the computer systems used by the City related to the travel process. We determined that the computer-processed data contained in these computer systems was sufficiently reliable for the purposes of the audit. There were minor exceptions⁸ for policies and procedures (noted in applicable finding), but the data was sufficiently reliable for the purposes of the audit.

This audit was conducted in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

⁸ For purposes of this audit report, we are defining the term "exception" as a computer system entry or transaction that does not follow the applicable written guidance (e.g. irregularities, deviation, and anomaly).

ALLEGATION - FINDING AND RECOMMENDATIONS

Allegation: The City Commissioners (i.e. Commissioners Andy Amoroso and Scott Maxwell) and the City Manager take personal trips paid with City funds. The allegation is **not supported**. All 101 trips audited had sufficient documentation to support a business purpose for the travel. We did not find sufficient evidence to support that the travelers used City funds to take personal trips as stated in the allegation.

Finding (1): The City Commissioners, Mayor, and Manager's travel was not properly approved and included reimbursements for personal travel expenses totaling \$962.50.

City's Travel Ordinance

The City's Code of Ordinances Section 2-8. – Travel expenses of city officers, employees and authorized persons, states,

Reimbursement for travel expenses for city officers, employees, and authorized persons shall be as set forth in a city resolution.

City's Travel Resolution

The City's Resolution No. 57-2012, adopted on December 4, 2012, states,

<u>Section 2.</u> The City Commission hereby assigns the responsibility of developing detailed policies and procedures for implementation of this resolution to the City Manager.

LODGING AND INCIDENTALS

The traveler will be reimbursed for actual expenses for lodging (at single occupancy rates) as well as travel and incidental expense as described in the City Manager's Travel Reimbursement Policy/Procedure. [Emphasis added]

City's Travel Policy

The City Manager Travel Policy [Implements Resolution No. 57-2012] states,

4. Authority to Incur Traveling Expenses

- a. Training and travel must be authorized in writing and certified as to funds available. [Emphasis added]
- b. If the traveler is a Department Director or anyone not reporting to Department Directors, travel must be approved in writing by the City Manager or designee.

- c. If the traveler is a City Commissioner or appointed board member, the City Manager may approve travel. Extra-ordinary travel outside the US will require City Commission approval.
- d. If the traveler is the City Manager, the City Attorney may approve travel.
- e. If the traveler is the City Attorney, the City Manager may approve travel.
- **5.** At no time is a traveler allowed to approve their own travel expenses. [Emphasis added]

8. Lodging

The traveler will be reimbursed for actual expenses for lodging (at single occupancy rates). [Emphasis added]

City's Travel Procedures

The City's Training and Travel Authorization and Reimbursement Procedures, last revised on December 4, 2012, states,

Purpose:

This policy provides for official business travel payment and reimbursement for City of Lake Worth elected officials, appointed officials and employees.

B. Training and Travel Authorization Portion of the Form

Authority to Incur Traveling Expenses

- 1. **Training and travel must be authorized in writing** and certified as to funds available by the Department Director, Section 1 of the Training or Travel Authorization and Expense Report form (see attached form). [Emphasis added]
- 3. If the traveler is a City Commissioner or appointed board member, the City Manager may approve Section 1.
- 4. If the traveler is the City Manager, the City Attorney may approve Section 1.
- 6. At no time is a traveler allowed to approve their own travel expenses.

Training or Travel Authorization and Expense Report Form

- All Classes of Travel A, B and C require all travelers to submit an approved Section 1 of the Training or Travel Authorization and Expense Report form to their Department Director or City Manager at least ten (10) working days prior to date of departure, whether or not advance funds are requested. [Emphasis added]
 - a. Note: Whenever possible conference fee discounts should be embraced by City staff with requests being submitted for approval at least 10 days prior the expiration of the discount period. The conference brochure or other supporting information must be attached which details registration fees, dates and whether or not meals are included in the registration fee. Exceptions to this advance requirement may be approved in writing on a case-by-case basis by the City Manager. [Emphasis added]
 - b. No air, hotel or registrations can be charged to a procurement card until the approved travel authorization is received back from the Department Director or City Manager.

City's Purchasing Card Policies and Procedures

The City's Purchasing Card Policies and Procedures - Finance Department (Purchasing Card Procedures), last revised on October 31, 2013, states,

SECTION II • POLICIES AND PROCEDURES

LIMITATIONS ON USE OF PURCHASING CARD

2. CITY PURCHASES ONLY

The Purchasing Card is to be used for City authorized purchases only. The Purchasing card cannot be used for any personal use and any such use will require immediate reimbursement and can result in disciplinary action which may include dismissal and/or criminal charges. [Emphasis added]

We reviewed all overnight travel documentation for the City Commissioners, Mayor, and Manager to determine if:

- 1. Travel was for a documented and adequately supported business purpose and properly approved.
- 2. The traveler was reimbursed for actual expenses or per diem amounts associated with personal business/use.
- 3. Expenses for non-employees were reimbursed to the traveler.
- 4. The traveler actually completed the trip.

We found that 83 of the 101 trips audited, totaling \$102,464.709, were not authorized in writing prior to the travel start date, as required. The City did not provide an authorized "Training or Travel Authorization and Expense Report Form," as required by the Travel Policy and Procedures or any other documentation showing proper approval for these trips. Ten (10) of the 83 trips, totaling \$16,193.16, were authorized in writing after the trip occurred. The costs for these trips are considered questioned, identified, and avoidable costs in Finding 2.

We found 13 instances of personal expenses reimbursed by the City to travelers for upgrades, lodging expenses, liquor, parking expenses, and tolls that did not have a benefit to the City or the residents of the City, totaling \$962.50 (see Chart 1 below). These expenses were noted as identified and avoidable costs in Finding 2 under the exception type "Disallowed/Prohibited by Policy".

Chart 1:

Traveler	No. of Reimbursements for Personal Expenses	Amount
Commissioner Amoroso	2	\$85.68
City Manager Bornstein	1	\$9.60
Commissioner Hardy	5	\$235.13
Commissioner Maxwell	1	\$32.24
Commissioner Robinson	1	\$512.75
Mayor Triolo	3	\$87.10
Grand Total	13	\$962.50

We found the travel documentation for the overnight travel, e.g. conference agenda, hotel folio, airfare, tolls, and meal receipts, was consistent with the traveler completing the trip.

Overall, we did not find sufficient documentation to support that the travelers used City funds to conduct personal travel as stated in the allegation; therefore, the **allegation as stated is not supported**. However, the City Commissioners, Mayor, and Manager's travel for business purposes was not properly approved and included reimbursements for personal travel expenses totaling \$962.50.

The City staff that coordinated the Commissioners, Mayor, and City Manager's travel informed us that they did not receive formal training and were not aware of the Travel Policy; therefore, the travel authorization and expense forms were not completed unless there was an advance or reimbursement due to the traveler. Finance staff confirmed to us that the City's travel process did not include completing travel authorization and expense forms unless an advance or reimbursement was due to the traveler.

⁹ The total amount of trips considered questioned costs for improper approval in Finding 2 of \$94,980.39 is less than the amount of trips not properly approved of \$102,464.70 because certain transactions were considered questioned costs for a separate violation, such as disallowed/prohibited by policy, insufficient documentation (no receipt), incorrect per diem/mileage, or sales tax paid.

As a result, the Commissioners, Mayor and City Manager's travel activities and documentation did not comply with the City's Travel Resolution, Travel Policy, Travel Procedures, and Purchasing Card Procedures with respect to requirements for travel authorizations, documentation, and allowable expenditures.

Because the City did not complete and approve travel authorization and expense forms except when a travel advance or reimbursement was requested, travel expenditures lacked sufficient review and oversight to ensure that travel expenditures complied with policy, were sufficiently supported, and did not include disallowed or prohibited purchases, such as personal expenses or expenses for unauthorized travelers.

A lack of adequate review and oversight increases the risk for non-compliance with policy and procedure and also exposes the City to an increased risk for fraud, waste, and abuse.

Corrective Action

During the audit, the City implemented a checklist to assist City staff in complying with the City's Travel Resolution, Policy, and Procedures. Key requirements, such as authorization to travel, required supporting documentation, approval of final travel expenses, and cut-off dates are outlined in the checklist.

Recommendations:

- (1) The City comply with the City's Travel Resolution, Travel Policy, Travel Procedures, and Purchasing Card Procedures.
- (2) The City develop an adequate training program for travelers and individuals preparing and/or processing travel expense reports for travelers or require that they acknowledge their understanding of the Travel Resolution, Travel Policy, and Travel Procedures requirements and responsibilities.

Management Response:

City Management shall implement an annual travel training schedule; including, training at time of hire, for all City employees. This training shall encompass items outlined in the City's Travel Resolution, Travel Policies and Procedures, Purchasing Card Policies and Procedures and other associated travel reimbursement policies and procedures. The training will include an employee's attestation that they received training and understand their responsibilities as a City Employee relative to Travel Policies, Procedures, requirements and responsibilities. Additionally, the Finance Department shall address oversight deficiencies associated with travel reimbursements and vendor payments.

FINDINGS NOT RELATED TO THE ALLEGATION

Finding (2): The City Commissioners, Mayor, and Manager often did not comply with the City's Travel Resolution, Travel Policy, Travel Procedures, and Purchasing Card Procedures and incurred unnecessary costs.

City's Travel Ordinance

The City's Code of Ordinances Section 2-8. – Travel expenses of city officers, employees and authorized persons, states,

Reimbursement for travel expenses for city officers, employees, and authorized persons shall be as set forth in a city resolution.



City's Travel Resolution

The Travel Resolution states,

<u>Section 2.</u> The City Commission hereby assigns the responsibility of developing detailed policies and procedures for implementation of this resolution to the City Manager.

<u>Section 3.</u> The City Commission hereby determines that city officers and other authorized persons as defined in section 166.021 (9), Florida Statutes, may be reimbursed for the following classes of travel within the following policy parameters:

TRAVEL CLASSES

Class A: Continuous travel of twenty-four hours or more away from the City.

<u>Class B</u>: Continuous travel of less than twenty-four hours that involves an overnight absence from the City.

<u>Class C</u>: Travel for short or day trips where the traveler is not away from the City overnight.

MEAL ALLOWANCE

Meal reimbursements amounts shall be as follows:

All <u>Class A and Class B</u> travelers will be given a per diem meal allowance when traveling on official City business up to the amount permitted for meals as follows:

Breakfast \$8.00

Lunch \$15.00 Dinner \$20.00

MILEAGE ALLOWANCE

Mileage allowance at a fixed rate of the then prevailing IRS vehicle reimbursement rate if a personal vehicle is allowed in lieu of a City vehicle in accordance with the City Manager's Travel Reimbursement Policy/Procedure.

LODGING AND INCIDENTALS

The traveler will be reimbursed for actual expenses for lodging (at single occupancy rates) as well as travel and incidental expense as described in the City Manager's Travel reimbursement Policy/Procedure.

City's Travel Policy

The Travel Policy states,

4. Authority to Incur Traveling Expenses

- a. Training and travel **must be authorized in writing** and certified as to funds available. [Emphasis added]
- b. If the traveler is a Department Director or anyone not reporting to Department Directors, travel must be approved in writing by the City Manager or designee.
- c. If the traveler is a City Commissioner or appointed board member, the City Manager may approve travel. Extra-ordinary travel outside the US will require City Commission approval.
- d. If the traveler is the City Manager, the City Attorney may approve travel.
- e. If the traveler is the City Attorney, the City Manager may approve travel.

5. At no time is a traveler allowed to approve their own travel expenses. [Emphasis added]

7. Allowance for Meals (see Resolution 57- 2012)

Meal Allowance Amounts:

a. Eligible travelers in Class A and B travel status will be given a per diem meal allowance when traveling on official City business up to the amount listed below:

Breakfast \$8.00Lunch \$15.00Dinner \$20.00

NOTE:

- No meal allowances will be given for Class C travel.
- The City will pay only for meal allowance (per diem) amounts. No reimbursement will be made for the actual cost of the meal. [Emphasis added]
- No meals purchased for others will be reimbursed unless prior approval has been received from the City Manager.
- If meals are included in a conference registration no meal allowance will be paid. [Emphasis added]

8. Lodging

The traveler will be reimbursed for actual expenses for lodging (at single occupancy rates).

9. Transportation:

- a. Transportation must be the most economical means considering time of the traveler, cost of transportation and per diem or subsistence required and the number of travelers making the trip and the amount of equipment or material to be transported. [Emphasis added]
- b. Transportation must be by usually traveled route.
- c. Incidental Expenses:

The following incidental travel expenses incurred by a traveler <u>may be</u> <u>authorized</u> when receipts are provided (note: gratuities and tips are not reimbursable by the City): [Emphasis added]

- Reasonable taxi fares
- Tolls
- Parking fees
- Communication expenses for official City business
- Conference or training course registration fees.

City's Travel Procedures

The Travel Procedures state,

Purpose:

This policy provides for official business travel payment and reimbursement for City of Lake Worth elected officials, appointed officials and employees.

B. Training and Travel Authorization Portion of the Form

Authority to Incur Traveling Expenses

- Training and travel must be authorized in writing and certified as to funds available by the Department Director, Section 1 of the Training or Travel Authorization and Expense Report form (see attached form). [Emphasis added]
- 3. If the traveler is a City Commissioner or appointed board member, the City Manager may approve Section 1.
- 4. If the traveler is the City Manager, the City Attorney may approve Section 1.
- 6. At no time is a traveler allowed to approve their own travel expenses. [Emphasis added]

Training or Travel Authorization and Expense Report Form

- 1. All Classes of Travel A, B and C require all travelers to submit an approved Section 1 of the Training or Travel Authorization and Expense Report form to their Department Director or City Manager at least ten (10) working days prior to date of departure, whether or not advance funds are requested. [Emphasis added]
 - a. Note: Whenever possible conference fee discounts should be embraced by City staff with requests being submitted for approval at least 10 days prior the expiration of the discount period... [Emphasis added]
 - b. No air, hotel or registrations can be charged to a procurement card until the approved travel authorization is received back from the Department Director or City Manager. [Emphasis added]

C. Travel Reimbursement

a. At completion of travel, the original Section 1 is retrieved from the traveler's computer and the expense report (Section 2) should be completed, reviewed for appropriateness and accuracy before written approval by the Department Director or City Manager then submitted to Finance within five (5) days after traveler returns from the trip with accompanying and supporting documentation attached. Failure to file Section 2 within the prescribed time limits may result in disciplinary action and/or the traveler being responsible for all expenses. Any amount(s) claimed on Section 2 in excess of total authorization on Section 1 must be explained. [Emphasis added]

F. Lodging

d. All expenses, except meals, must be substantiated by paid receipts. Meals shall not be listed on hotel bills. [Emphasis added]

G. Transportation

Transportation must be the most economical means considering time of the traveler, cost of transportation and per diem or subsistence required and the number of travelers making the trip and the amount of equipment or material to be transported. [Emphasis added]

c. A rental car may be used by the traveler only if absolutely necessary and specifically approved in advance by the City Manager in writing and is more economical than mileage reimbursement.

e. Price comparisons from an established travel site such as Orbitz or Expedia are sufficient to determine that the most economical ticket was purchased.

j. Transportation must be by usually traveled route.

- If a person travels by an indirect route, or by any preferred class, or incurs additional travel expenses for personal convenience, any extra costs shall be borne by the traveler. [Emphasis added]
- Deviations to a usually traveled route shall be approved in advance. Reimbursement for expenses shall be based only on charges that would have been incurred by a usually traveled route with cost comparisons accompanying the form to support the route traveled.

I. Miscellaneous Provisions and Regulations

The following provisions and regulations shall be considered when traveling on official City business:

- b. Laundry and **cleaning expenses are not reimbursable**. [Emphasis added]
- c. When authorization is granted to individuals for air travel expenses that are financed through City funds, only "coach class" tickets shall be allowed.
 - No one shall be reimbursed for any meal or lodging included in a conference registration fee paid by the City.
 - Hotel charges should be made directly by the City by use of a City check or City credit card to avoid Florida Sales Tax charges. A copy of the City's tax exemption certificate shall be obtained by the traveler from the Finance Department prior to departure and used to avoid Florida sales tax charges on lodging. Failure to follow this procedure may result in refusal, by the City, to reimburse the traveler for Florida sales tax expense. [Emphasis added]
- e. Meals will be reimbursed at the City's allowable meal rate. [Emphasis added]
- f. Receipts are required for Class A and Class B travel for all expenditures other than meals. Receipts are required for all Class C travel expenditures. If receipts are not turned in, travelers shall not be reimbursed. [Emphasis added]

City's Purchasing Card Policies and Procedures

The Purchasing Card Procedures state,

SECTION I • INTRODUCTION

C. WHO DOES WHAT?

The following is a summary of the responsibilities of the individuals and organizations involved in the Purchasing Card system.

Cardholder

- Hold and secure Purchasing Card
- Order materials and services
- Collect and save original sales receipts [Emphasis added]
- Match receipts with monthly card statement
- Input transaction information into H.T.E.- Procurement Module at least monthly after statement distributed by Finance
- Forward all original receipts to Department Director once completed in H.T.E.-Procurement Module
- Identify all disputed charges and making copies of all sales receipts and give to the Departmental Card Representative

SECTION II • POLICIES AND PROCEDURES

LIMITATIONS ON USE OF PURCHASING CARD

2. CITY PURCHASES ONLY

The Purchasing Card is to be used for City authorized purchases only. The Purchasing card cannot be used for any personal use and any such use will require immediate reimbursement and can result in disciplinary action which may include dismissal and/or criminal charges. [Emphasis added]

PROHIBITED USES OF PROCUREMENT CARDS

The following types of items may not be purchased with a Purchasing Card, no matter the dollar amount:

- Food of any variety
 - Exceptions based on City Manager Approval per Attachment 3 Authorization Form. Example:
 - City Clerk for City Commission functions
 - Employees in travel status may use the card for meal purchases.
 However, the costs may not be in excess of the meal limits defined by the City Travel Policy. Amounts spent need to be entered in the "Final Expense Report" section of the travel authorization form. [Emphasis added]
- Luxury items
- · Beer, wine or any alcoholic beverages...

Florida Revenue Act

Section 212.08, Florida Statutes, states,

(6) EXEMPTIONS; POLITICAL SUBDIVISIONS -

(a) There are also exempt from the tax imposed by this chapter sales made to the United States Government, a state, or any county, municipality, or political subdivision of a state when payment is made directly to the dealer by the government entity.

We reviewed the City's General Ledger, travel forms, and purchasing card statements and receipts to identify all overnight travel charges for the City Commissioners, Mayor, and Manager. Our review identified 101 trips traveled during the period audited. We tested all 101 trips to determine if travel expenditures were properly documented and approved, and in compliance with applicable policies and procedures.

Of the 101 trips tested to determine if the travel was properly authorized, we found that 83 trips (82%), totaling \$102,464.70, were not authorized in writing prior to the travel start date, as required by the City's Travel Policy and Travel Procedures. Ten (10) of the 83 trips, totaling \$16,193.16, were authorized after the travel occurred.

The 101 trips tested were comprised of 423 travel related transactions¹⁰ totaling \$133,028.36. We found that 95 (94%) trips had the following exceptions:

- 1. There were 268 of the 423 (63%) transactions tested, totaling \$94,980.39,¹¹ that were not properly authorized, as required.
- 2. There were 31 of the 423 (7%) transactions tested, totaling \$2,041.91, that were for travel expenses disallowed or prohibited by the City's Travel Policy.
- 3. There were 16 of the 423 (4%) transactions tested, totaling \$895.63, that lacked sufficient documentation, such as a receipt or a missing documentation form, as required.
- There were 19 of the 423 (4%) transactions tested, totaling \$554.69, that were paid to the traveler directly by the City for incorrect per diem amounts or mileage rates.
- 5. There were 32 of the 423 (8%) transactions tested, totaling \$1,009.63, that were paid directly by the City and included Florida sales tax of which the City is exempt according to Section 212.08(6)(a), Florida Statutes.
- 6. There were 31 of the 423 (7%) transactions tested, totaling \$7,233.75, that were unnecessary expenses (e.g. late cancellation fees, valet parking when self-parking available, available discounts not obtained) incurred by the traveler(s).

¹⁰ All meals purchased by a traveler during the same trip were combined by meal type (i.e. breakfast, lunch, or dinner) for testing purposes. As a result, more than one (1) exception may be noted for each travel transaction.

¹¹ This amount is less than the total amount of \$102,464.70 noted previously as trips that were not properly authorized because many of the trips not properly authorized had transactions that were also an exception for a separate violation noted in this section. This amount summarizes transactions of unauthorized trips that had no other violations noted in testing.

Chart 2:

		Summary	of Exception	s by Traveler			
Traveler	Total Travel Transaction Amount	Not Properly Approved	Disallowed / Prohibited by Policy	Improper or Inadequate Support	Incorrect Per Diem / Mileage	Sales Tax Paid	Unnecessary Cost
Commissioner Amoroso	\$41,624.81	\$31,464.55	\$558.93	\$493.00	\$45.00	\$389.37	\$575.53
City Manager Bornstein	\$15,567.25	\$11,146.46	\$98.81	\$187.00	\$66.00	\$198.71	\$3,244.07
Commissioner Hardy	\$18,395.87	\$16,014.78	\$684.24	-	\$61.00	\$104.01	\$1,194.84
Commissioner Maxwell	\$27,633.93	\$17,003.22	\$92.24	\$27.48	\$336.69	\$219.03	\$980.31
Commissioner McVoy	\$1,930.18	\$1,817.34	\$7.84	-	-	-	\$105.00
Commissioner Robinson	\$9,166.10	\$4,431.29	\$512.75	\$54.00	\$31.00	\$50.26	\$165.00
Mayor Triolo	\$18,710.22	\$13,102.75	\$87.10	\$134.15	\$15.00	\$48.25	\$969.00
Grand Total	\$133,028.36	\$94,980.39	\$2,041.91	\$895.63	\$554.69	\$1,009.63	\$7,233.75

Of the travel transaction exceptions noted above, we considered \$103,473.55 questioned costs, \$3,242.45 were considered identified costs, and \$13,602.62 were considered avoidable costs. See Charts 3 and 4 below for a Summary of Costs by Exception and Traveler, and see Exhibit 1 for the Transaction Detail of Questioned/Identified Costs.

Chart 3:

Summary o	f Costs by Exc	eption	District of the last
Exception Type	Questioned Cost	Identified Cost	Avoidable Cost
Not Properly Approved	\$94,980.39	_	\$2,718.77
Disallowed/Prohibited by Policy	\$1,056.41	\$985.50	\$1,558.63
Insufficient documentation (no receipt)	\$187.00	\$708.63	\$505.48
Incorrect Per Diem or Mileage	\$16.00	\$538.69	\$538.69
Sales Tax Paid	-	\$1,009.63	\$1,009.63
Unnecessary Expenses/Costs	\$7,233.75	-	\$7,271.42
Total	\$103,473.55	\$3,242.45	\$13,602.62

Chart 4:

	Summary of	Costs by Travel	er	La la companie
Traveler	Questioned Costs (Due to Traveler)	Questioned Costs	Identified Costs (Due to the City)	Avoidable Costs
Commissioner Amoroso	-	\$32,490.33	\$1,036.05	\$2,766.60
City Manager Bornstein		\$14,666.74	\$274.31	\$4,157.59
Commissioner Hardy	-	\$17,658.73	\$400.14	\$1,598.48
Commissioner Maxwell	-	\$18,043.53	\$615.44	\$1,631.75
Commissioner McVoy		\$1,930.18	-	\$112.84
Commissioner Robinson	\$16.00	\$4,596.29	\$632.01	\$743.01
Mayor Triolo	-	\$14,071.75	\$284.50	\$2,592.35
Total	\$16.00	\$103,457.55	\$3,242.45	\$13,602.62

Most of the travel that was not properly authorized lacked the required travel authorization and expense forms that included sections to document proper authorization before and post-travel. The City staff that coordinated the Mayor and Commissioners' travel informed us that they did not receive formal training and were not aware of the Travel Policy; therefore, the travel authorization and expense forms were not completed unless there was an advance or reimbursement due to the traveler. Finance staff confirmed to us that the City's travel process did not include completing travel authorization and expense forms unless an advance or reimbursement was due to the traveler.

As a result, the City Commissioners, Mayor, and City Manager's travel activities and documentation often did not comply with the City's Travel Resolution, Travel Policy, Travel Procedures, and Purchasing Card Procedures with respect to requirements for approvals, allowed and necessary travel expenses, documentation, and per diem/mileage allowances.

Because the City did not complete and approve travel authorization and expense forms except when a travel advance or reimbursement was requested, travel expenditures lacked sufficient review and oversight to ensure that travel expenditures complied with policy, were sufficiently supported, and excluded Florida Sales Tax.

A lack of adequate review and oversight increases the risk for non-compliance with policy and procedures and exposes the City to an increased risk for fraud, waste, and abuse.

Recommendations:

- (3) The City consider recouping \$985.50 incorrectly reimbursed to travelers for travel expenses that were disallowed or prohibited by the City's Travel Resolution, Travel Policy, and/or Travel Procedures.
- (4) The City consider recouping \$708.63 incorrectly reimbursed to travelers for travel expenses that lacked sufficient documentation, as required.
- (5) The City recoup \$538.69 incorrectly reimbursed or advanced to travelers for incorrect per diem meal and mileage amounts.

- (6) The City consider reimbursing traveler \$16.00 for the per diem meal amount incorrectly deducted from the travel reimbursement.
- (7) The City consider obtaining reimbursement for the \$1,009.63 incorrectly paid for Florida Sales tax to vendors.

Management Response:

The activity outlined above includes several individuals no-longer employed by the City. As such, it is unlikely that the City will be successful in recouping amounts incurred by those individuals. However, management will evaluate and address the items associated with current employees; Commissioners Robinson and McVoy.

Finding (3): The City Manager Promotional Activities Account purchasing card expenditures lacked adequate review and oversight.



The City's Resolution No. 42-2014, adopted on August 19, 2014, states,

<u>Section 2.</u> The City is hereby authorized to provide food/refreshments for the services and event/functions listed in Exhibit "A", which is attached hereto and incorporated herein...

Exhibit A

Public purpose refreshment purchases.

City Clerk's Office

1. Volunteers in Public Service (VIPS)

Human Resources:

- 1. Employee Health Fair
- 2. Benefits Open Enrollment
- 3. Retirements
- 4. Employee Holiday luncheon

Public Services

- 1. District Meetings
- 2. Refuse Division

Leisure Services

- 1. Recreation events
- 2. Library

- 3. Casino/Beach
- 4. Other
 - a. Hosting Governmental Professional Organizations such as/but not limited to:
 - i. League of Cities
 - ii. City Manager Association
 - iii. City Clerk's Association
 - iv. Economic events promoting the City
- 5. Emergency Events purchase of bulk non-perishable supplies in anticipation of an emergency (should be returnable should the event not occur).

The City's Purchasing Card Procedures state,

SECTION I • INTRODUCTION

C. WHO DOES WHAT?

The following is a summary of the responsibilities of the individuals and organizations involved in the Purchasing Card system.

Cardholder

• Forward all original receipts to **Department Director** once completed in H.T.E.-Procurement Module [Emphasis added]

Departments/Divisions Purchasing Card Representative (individual designated by Department Head, if not selected then the Department Head will perform these functions)

Review monthly transactions of their subordinates [Emphasis added]

Finance Staff

Confirm all charges are sufficiently documented [Emphasis added]

SECTION II • POLICIES AND PROCEDURES

CITY PURCHASES ONLY

The Purchasing Card is to be used for City authorized purchases only. The Purchasing card cannot be used for any personal use and any such use will

require immediate reimbursement and can result in disciplinary action which may include dismissal and/or criminal charges. [Emphasis added]

PROHIBITED USES OF PROCUREMENT CARDS

The following types of items may not be purchased with a Purchasing Card, no matter the dollar amount:

- Food of any variety
 - Exceptions based on City Manager Approval per Attachment 3
 Authorization Form. Example: [Emphasis added]
 - City Clerk for City Commission functions
- Beer, wine or any alcoholic beverages

PROCEDURES FOR MAKING AND PAYING FOR PURCHASES

DOCUMENTATION OF OVER-THE-COUNTER PURCHASES

When an over-the-counter purchase is made, the cardholder must obtain the customer's copy of the charge slip. If the original receipt is not available, it must be documented on a signed copy of the receipt (see #5-Missing Documentation). [Emphasis added]

The charge slip will be retained either by the cardholder or by the Department/Division representative. All items purchased over-the-counter must be immediately available. No back ordering is allowed. Note: A complete description of the goods or service(s) purchased must be identified by the cardholder on the back of the merchant receipt if the face doesn't have the complete description of the purchase. [Emphasis added]

MISSING DOCUMENTATION

If for some reason the cardholder does not have receipt or external supporting documentation of the charge transaction to send with the monthly card statement, he/she must attempt to obtain this documentation. Where documentation cannot be obtained, the cardholder shall attach, sign and date a description of the purchase transaction's purpose. Each incident of missing charge documentation will also be copied into the employee's personnel file. Continued incidents of missing documentation may result in the cancellation of the employee's Purchasing Card and disciplinary action. [Emphasis added]

	FOOD PURCHASE AUTHORIZATION City of Lake Worth Finance Department
I hereby request FOOD PU of the public purpose):	RCHASE AUTHORIZATION for (please provide a brief expla
Cost estimate:	Per event? Date:
	Per fiscal Dates:

We selected a sample of 42¹² expenditure transactions, totaling \$19,133.73, from the City Commissioner and City Manager's Promotional Activities general ledger accounts to determine if the expenditures were properly documented, approved, and in compliance with applicable ordinances, policies, and procedures.

We found ten (10) of the 42 (24%) expenditure transactions, totaling \$982.72, lacked a valid business purpose, sufficient supporting documentation, or both.

- Three (3) of 42 (7%) transactions, totaling \$287.98, lacked both a valid business purpose and a receipt or invoice showing items purchased.
- Six (6) of 42 (14%) transactions, totaling \$633.22, lacked a valid business purpose.
- One (1) of 42 (2%) transactions, in the amount of \$61.52, lacked a valid receipt.¹³

All ten (10) expenditures were purchases made via the City Manager's purchasing card at local restaurants. The nine (9) transactions lacking a valid business purpose were described as a "meeting", "business meeting", or "lunch meeting" on the City's general ledger, and the City did not provide additional information as to the purpose of the meetings, upon our request.

¹² We selected 15 transactions randomly, 26 transactions based on the potential for being personal purchases (e.g. local restaurant purchases), and 1 transaction based on the potential for being a violation of Resolution 42-2014 for a total of 42 sample transactions for testing procedures.

¹³ The receipt provided by the City appeared to be a receipt from a different restaurant as it did not agree with the purchasing card statement amount and showed food items purchased that were not available according to the restaurant's website.

It appears there is not adequate independent oversight and review of the City Manager's purchasing card purchases. The Purchasing Card Procedures do not designate the position/title that is responsible for reviewing and approving the City Manager's purchasing card purchases. According to City staff we interviewed, the Finance Director approves the City Manager's purchasing card purchases. The City's Charter states that all appointive officers, except the city manager, city attorney, 14 and internal auditor are appointed by the city manager, and that the city manager shall appoint, suspend, or remove all city employees and appointive administrative officers, except as otherwise provided by the Charter. As a result, the finance director, who the City Manager may suspend or remove, cannot provide adequate independent oversight and review of the City Manager's purchasing card purchases.

Additionally, the City is exposed to an increased risk for fraud, waste, and abuse if Promotional Activities account spending via purchasing cards is not independently reviewed and approved for compliance with the Purchasing Card Procedures.

We could not determine if the City Manager's purchasing card purchases complied with City ordinance, policy, and procedure. The Promotional Activities account transactions totaling \$982.72¹⁵ are considered questioned costs because there was a lack of sufficient documentation to support the expenditures.

Recommendation:

(8) The City designate an independent approver for the City Manager's purchasing card purchases and update the Purchasing Card Policies and Procedures to reflect the designated reviewer.

Management Response:

Management agrees that all purchasing card activity should be independently reviewed; including, activity incurred by the City Manager. Management shall evaluate the most efficient means and position to address this observation, and will update the appropriate policies and procedures as necessary.

Finding (4): The City lacks adequate written guidance for IT processes.



The audit included review of data reliability and integrity for the computer systems related to the travel activities and discretionary spending, including the financial computer system. We found that the City had processes with controls to ensure the integrity of information in the computer systems; however, there were no written policies and procedures for any of the IT processes, such as granting and terminating user access, the use of unique IDs and passwords, and remote access. The former IT Director stated there were no written policies and procedures to provide guidance

¹⁴ The City's Travel Policy and Travel Procedures designate the City Attorney as the approver of City Manager travel.

^{15 \$287.98 + \$633.22 + \$61.52 = \$982.72} in Questioned Costs from Promotional Activities account testing

to new employees or system users for the IT processes; however, the IT Department was in the process of updating the policies and procedures.

Basic computer system controls include:

- Written IT policies, procedures, and definitions that are clearly communicated;
- Access to and use of the system and records are reasonable and restricted to authorized individuals; and
- System users are granted only the access needed to perform their duties.

The former IT Director stated the City was focused on upgrading the infrastructure and ensuring proper cybersecurity features, which delayed developing and implementing policies and procedures for the processes that were already in place.

A lack of written policies and procedures increases the risk of inconsistent operations and unauthorized access to system records.

Corrective Action

During the audit, the City provided the following IT policies and procedure:

- Acceptable Use Policy
- Cyber Security Policy
- Password Policy
- Overall Technology Policy Regarding E-Mail, Voice Mail, Internet and Computer Systems
- Internet Usage and Systems Monitoring Policy
- Procedure for Control of SunGard Public Sector Naviline System Access
- Third Party Remote Access Cyber Security Policy
- Third-Party Security Policy

Recommendations:

- (9) The City develop and implement written IT policies and procedures to ensure consistency of operations that provide guidance, at a minimum, for how to:
 - a. Assign and remove user rights and a reasonable time for removal when access is no longer appropriate,
 - b. Authorize user access.
 - c. Limit system access by requiring unique user IDs and passwords, and
 - d. Provide for user change management (new and separated employees).
- (10) The City provide staff training for the IT policies and procedures, as needed.

Management Response:

Management agrees with the necessity of having strong IT policies and procedures as identified above along with associated training. In this vain, Management shall continue to evaluate areas of weakness and update City Policies and Procedures where/when necessary.

Finding (5): The City did not require completed travel forms nor consolidate the required and necessary documentation and support for the City Commissioners, Mayor, and Manager's travel in a complete and consistent manner.

The City's Travel Procedures state,

B. Training and Travel Authorization Portion of the Form



Training or Travel Authorization and Expense Report Form

- All Classes of Travel A, B and C require all travelers to submit an approved Section 1 of the Training or Travel Authorization and Expense Report form to their Department Director or City Manager at least ten (10) working days prior to date of departure, whether or not advance funds are requested. [Emphasis added]
 - a. Note: Whenever possible conference fee discounts should be embraced by City staff with requests being submitted for approval at least 10 days prior the expiration of the discount period. The conference brochure or other supporting information must be attached which details registration fees, dates and whether or not meals are included in the registration fee. Exceptions to this advance requirement may be approved in writing on a case-by-case basis by the City Manager. [Emphasis added]

C. Travel Reimbursement

a. At completion of travel, the original Section 1 is retrieved from the traveler's computer and the expense report (Section 2) should be completed, reviewed for appropriateness and accuracy before written approval by the Department Director or City Manager then submitted to Finance within five (5) days after traveler returns from the trip with accompanying and supporting documentation attached. Failure to file Section 2 within the prescribed time limits may result in disciplinary action and/or the traveler being responsible for all expenses. Any amount(s) claimed on Section 2 in excess of total authorization on Section 1 must be explained. [Emphasis added]

Of the 101 overnight trips identified for the City Manager and Commissioners, 73 (72%) were missing a Training or Travel Authorization and Expense Report Form, as required by the Travel Procedures. Additionally, the City did not consolidate the required and

necessary documentation and support for the City Manager and Commissioners' travel in a complete and consistent manner. In some cases, the City was not able to provide us with all of the overnight travel supporting documentation.

We compiled the population of overnight travel expenditures and obtained the majority of the travel supporting documentation by searching the City's Interdepartmental Finance drive for purchasing card statements and receipts by the individual traveler and/or the travelers' Executive Assistant responsible for coordinating travel activities. We made several requests for travel supporting documentation that we could not readily locate on the City's Interdepartmental Finance drive and observed that most of the requested documentation was provided in a piecemeal manner rather than in consolidated travel packets by traveler and trip.

We reconciled the population of overnight travel expenditures that we compiled to the City's general ledger to ensure all applicable travel expenditures were identified. We found five (5) training expenditures on the general ledger, totaling \$1,853.00 that lacked a supporting receipt or invoice and are considered questioned costs.

The City staff that coordinated the City Manager and Commissioners' travel informed us that they did not receive formal training and were not aware of the Travel Policy; therefore, the travel authorization and expense forms were not completed unless there was an advance or reimbursement due to the traveler. Finance staff confirmed to us that the City's travel process did not include completing travel authorization and expense forms unless an advance or reimbursement was due to the traveler. As a result, the City Manager and Commissioner's travel documentation did not comply with the City's Travel Procedures.

In addition, it appears that the City consolidated travel records by traveler and trip only when the traveler requested an advance or reimbursement which required the travel authorization and expense forms to be completed and approved. A lack of complete, consolidated travel supporting documentation increases the risk that the City may not be able to locate all of the appropriate records in a public records request, in accordance with section 119.07, F.S., Inspection and copying of records; photographing public records; fees; exemptions.

Recommendation:

(11) The City consolidate and retain the City Commissioner's, Mayor, and Manager's travel records by traveler and trip and reconcile traveler Training or Travel Authorization and Expense Report Forms to purchasing card and cash disbursement records to ensure all applicable travel expenditures are reported and related expenditure documentation is included as support.

Management Response:

The City shall update its accounting and accounts payable operating procedures to require that travel is properly authorized and expenditure activity is sufficiently

documented and reconciled. Furthermore, this documentation will be filed and retained as part of the City's document retention policies and procedures.

SUMMARY OF POTENTIAL FINANCIAL AND OTHER BENEFITS IDENTIFIED IN THE AUDIT

Questioned Costs

Finding	Description	Questioned Costs
2	Not Properly Approved	\$94,980.39
2	Disallowed/Prohibited by Policy	\$1,056.41
2	Insufficient Documentation	\$187.00
2	Incorrect Per Diem or Mileage	\$16.00
2	Unnecessary Costs	\$7,233.75
3	Promotional Account Spending	\$982.72
5	Insufficient documentation	\$1,853.00
	TOTAL QUESTIONED COSTS	\$106,309.27

Identified Costs

Finding	Description	Identified Costs
2	Disallowed/Prohibited by Policy	\$985.50
2	Insufficient Documentation	\$708.63
2	Sales Tax Paid	\$1,009.63
2	Incorrect Per Diem or Mileage	\$538.69
	TOTAL IDENTIFIED COSTS	\$3,242.45

Avoidable Costs

Finding	Description	Avoidable Costs
2	Lost discounts, upgrades, taxes, fees, etc.	\$13,602.62
	TOTAL AVOIDABLE COSTS	\$13,602.62

ACKNOWLEDGEMENT

The Inspector General's audit staff would like to extend our appreciation to the City of Lake Worth Beach's staff for their assistance and support in the completion of this audit.

This report is available on the OIG website at: http://www.pbcgov.com/OIG. Please address inquiries regarding this report to the Director of Audit by email at inspector@pbcgov.org or by telephone at (561) 233-2350.

EXHIBIT LIST

Exhibit 1 -Transaction Detail for Questioned/Identified Costs

ATTACHMENT

Attachment 1 – City of Lake Worth Beach's Management Response

EXHIBIT 1

Sales	Peid		I	I							I		I		I	I	I	I		I	I	I						I	I	I	I	I	I									I		I	I	I	I	I	I	I	I	I	T	Γ					I	I	I		I	I
Unneces	Coets																																																															
Incorrect Per Diem /	Мійезде																																																															
Lack of Proper	Podding																																																															
Lack of Proper	Approvat																															4			н	×	34	M	×	×	×	×	×	× 1	H I	,		2 3					H	×	70	×	×	×	14	ké k	2 34	×		
Prohibited	Ram(s)	×				×	×	×	×	*			,				R I		×		-	K	K	×	×	×	×	×	×	×																																		
Avoidable	Course	16.27	0000	990	23 00	15,68	92.71		138.02	L	L		90.4	1000	20 40	ı	20.00	20.02	20000	112.13		3	1	22.2A	2.00		44.65	100	512.75	000	1000	ı							\$ 550.00					Ī	1	1	Ī												Ī					
9	Contra			090 3	Ш	\$ 75.68		44		97	2 10 00 8	+		Ī		40.00	00.00		27 277	9 117.13	90.00	20.00	20.00	32.24			7		517.75		-	-	İ						-			1		1			I	Ī	Ī			T							1					
Costs (des	*mployee)														1								1		1																						T																	1
Ossetloned		18.27					\$ 17.76		\$ 136.02		ı	S 45.7E	8.36	101 101	20 20 20	MA MA			2 442,01	1000	3.50			400	ľ		68.85	١				\$ 27.00	138.00	\$ 274.50	\$ 44.00	\$ 450.00	П			\$ 1,739.15	90'59'5		1	ш	90.00	103.00	П		L	36.67					239.00	289.00		15.00			\$ 328.00			
Parketin	Description	<u> </u>	16.40		400	-	_	-	-	•	-	Ro	d	i i	O COLUMN THE PROPERTY OF THE P		Dem Opprison	Parama - Managar Parama de Parama	214	Desir Opprise	214	n c		Moom Service/Moss	7	-		HOOM Servicemoter resourant	Lodging	- 1		First		1	-			Registration	Registration		-		Airland		+	Codenia Carrier for	T	T	T		1	Fuel		П		Lodging (balance) for 3/20/2019		Sheal	т	Director can diam	Т		Г	
į	9	W2012019 - 6112010	The married of the contraction	3/3/2019 - 3/5/2019	11/14/2017 - 11/19/2017		17AL2018 - 11/10/2018	\$1AUZ018 - 11/10/2018	8/13/2019 - 8/15/2019	13	w	123	L	BLOTING ASSESSED	1	CONTRACTOR OF STREET	GCOZOZO - GLOVALA	٠.	TOTAL TOTAL	176,016 - 171 (4,016	5/15/2018 -0/19/2018	DIOXAL P. GOVERN	W1962019 - 36202019		8/10/2016 - 8/18/2018	1	11772018 - 11710/2018		2147078 - 2707218	WINDSOLD - WINDSOLD	WINDS BUSINESS OF THE PERSONS ASSESSED.	67292019 - 6172019	SCHOOLS - 6/1/2019	6/29/2019 - 6/1/2019	5/29/2019 - 6/1/2019	5/29/2019 - 6/1/2019	5/29/2019 - 6/1/2019	\$131/2017 - 6/3/2017		11/16/2016 - 11/20/2016	11/16/2016 - 11/20/2016	43572	1/21/2019 - 1/22/2019		STATISTICS STATISTICS	~ •			1	1		1.0		3/20/2019 - 2/21/2019	1.0	1		3/24/2019 - 3/27/2019	6 1	WW2010 - 3/5/2019	3/3/2019 - 3/5/2019	3/3/2019 - 3/5/2019	3/3/2019 - 3/5/2019	
f condition	Lacadora	Orlando, Fil.	T. T	Tollahussane, Fi	Charlotte, NC	Honobáu, Hil	Los Angeles, CA	Los Angeles, CA	Ortando, FL.	Prisburgh, PA	Personal PA	Washinston DC	Manhinston Mr.	AV BEST HER SPECIAL SP	Washington Av	NA MERINANDIANA PAR	DOSION, MA	Charlette, NC	Charlotte, P.C.	Los Angeles, CA	Savannah, GA	Davarram, C.	1.0687ussee, r.c.	Hollywood, Ft.	Hollywood, Ft.	Los Angeles, CA	Los Angeles, CA	Prisough, PA	Savernan, GA	Sugnation, F.	Washington LX	Orlando Fi	Orlands FL	Orlando, FL.	Orlando, FL	Orlendo, FL	Orlando, FL	Orlando, FL	Oriendo, FL	Patsturgh, PA	Petsburgh, PA	Tallahassee, Ft.	Toffahossee, Ft.	Callahatisse, Ft.	Amanastee, Ft.	Value of Contract	Tottahnesse Ft	Tallahansan Fi	Tallabassan Si	Tallahasane F.	Talahassee, FL	Talkehissise Fl.	Tallahassee, FL.	Tallahastsee, Ft.	Taffahussoe, FL	Taffahassee, Ft.	Tafahansee, FL.	Taffahassee, Ft.	Tallahassee, Ft.	Tollahansee Ft	Tallahassee, Ft.	Tallahassee, Ft.	Tallahassae, Ft.	
1	-	City Manager Bornstein	- 11		Ommissioner Amoreso	Ommissioner Amoroso	Commissioner Amoroso	Commissioner Amonoso	Commissioner Amoroso	Commissioner Amoroso	Commissiones Amounto	Commissioner Amongo	П	1		Continues some actions	Commissioner name	Commissioner Rardy	SPATISSIONE MAILY	ommissioner Margy	omensioner Hardy	permanence manny	own resource margy	Commissioner Manwell	Commissioner Maxwell	Commissioner Maxwell	pmmissioner Maxwell	Commissioner MCVoy	Commissioner Robinson	Mayor 1000	Sayor Stroke	Cay Manager Bornstoin	in Manager Romstein	City Manager Bornstein	City Manager Bornstein	City Manager Bomstein	City Manager Bornstein	City Manager Bornstain	City Manager Bemstein	lly Manager Bornstein	City Manager Bornstein	ny Manager Bornstein	City Manager Somstein	ty Manager Bornstein	City Manager Sometiers	City Manager Bornstrain	Cau through Remarks	City Manager Remetain	the Manager Sometain	City Manager Remelain	ty Manager Bornstein	City Manager Bornstein	ity Manager Bornstein	City Manager Bornstein	City Manager Bornstein	City Manager Bornstein	ity Manager Bornstein	City Manager Bornstein	My Manager Bornstein	City Manager Bornstein	City Manager Bornstein	City Manager Bornstein	ty Manager Bornstein	

Sales Tax	Paid			T	T		T	T	I	T		I			I	T	T	T	T	T	I	T	T	I	I		T									T	I			T						I		I	I		I		I	T							I
Unneces	Coats																																																												
Incorrect Per Diens /	Wileage																																																												I
Lack of Proper	Support		1	1	Ī		Ī	Ì	Ī		Ī	T	T	Ī	Ī	1	T	T	Ī	Ī	Ī	Ī	T	T		Ī	T	I		Ī							T	Ī	Ī	Ī						1	1	Ī		Ī	Ī	I	Ī	Ī							T
_		×	X	100	e 2	,	,		2	4 1	×	×	×	×	*	34	200 2	e i	* >			. >	. 3	1 2	6 3		< >		*	×	×	м	×	×	×	×	× ,	¢ 34	1 1	×	×	×	36	×	×	×	× :	× 1	,	× :	× ×	i ii	×	24	76	×	34	×	×	34	×××
Prohibited	Rem(s)							Ī			Ī		Ī																																																
	Costs							Ī			10000	S NOTES	1	WYCZ &				Ī									Ī																		- 1	D0704E 8				480 AM	DOVOCE &									- 1	\$ 274.73
Identified	Costs				Ī				Ī														Ī																																						
W .	(sadojdus)				Ì						Ī	Ī											T			Ī	Ī										İ											Ī	Ī	Ī			Ī								
Questioned	Costs	\$ 149.00	290.00	07 000 70	2000000	8 659.00	1.	1		2012.00		90.00		2000	400.00	0000	012:00	S CEC 18	S 47.52	\$ 567.00	8 605.00	1		1	90 000 8		2000	34 00	8 456.40	\$ 290.00	\$ 20.00	\$ 250.00	\$ 199.00	\$ 225.00	5 179,00	00'00'	00000	\$ 401.95	\$ 545.00	\$ 40.00		ш	5 478.00	- 1	8 000	-1	ı	9 200,000		9 150.00	5 367.20	\$ 683.58	\$ 227.86	\$ 295.00	\$ 20.00	\$ 30.00	\$ 313.30	\$ 336.29	\$ 572.46		5 274,73
	Description	Lodging	Registration	VALUE OF THE PROPERTY OF THE P	I adales (desent)	Receptuation	Airtige	Lodeine	+	Aldren	4	-				Megalifications - extens severally	Action	Contains Contains	Shutsh	Lodaina (deposit)	Bacintration	Reciptation	f Admin (hattares)	I odnino (danositi	Bacistesion	Mercen Specifical South contractor	Places Sandraiblished shother county	Shuttle	Airlan	Lodging (deposit)	Parking - self	Registration	Ledging (deposit)	Registration	Ledging	Out of the control of	STATE OF	Artinos	Recentration	Registration - soons session	Registration - museum	Registration - walking loss:	Lodging	Room Service/Hotel	Moorn Services Noted Restitutions	Negeriation	Looging	Contestantion	Street and de Stockel paster gand	Engineerings	Airtare	Lodging (balance)	Lodging (disposit)	Regulation	Room sandcelhotal restaurant	Shuttle	Arthres	Auflera	Codomo	Lodging	Lottging - 1.859 Cancellation Panalty Room service/feelst contactors
	Dates	2/14/2019 - 2/15/2019	274/2019 - 2/15/2019	TENTAL AND AND AND AND AND AND AND AND AND AND	THE STATE OF THE S	THE STATE OF THE S	ACTORIS - AV202018	STOCKE BANCOLS	STOCKE STOCKE	# 14 4 4 4 4 4 5 5 5 5 5 5 5 5 5 5 5 5 5	THE PERSON ASSESSMENT	TINZBINE - / INTBINE	THE PERSON OF THE PERSON OF	AND STREET - JOSEPH STREET	(IDSMETT - / IDSMITT	ANZEGE - AIGHAUL	Anadata - Control	SHADON STATISTICS	644972017 - 67242017	8/16/2018 - 8/19/2018	ATHUDOTA - RYSOZOTE	GOGODIA - BORONIA	4-MUSCH - 4-140/2048	11/6/2018 - 11/6/2018	THEODIS STROOMS	STANDONE . STANDONER	TANDONS - THEODOR	11/0/2018 - 11/10/2018	11/8/2018 - 11/1 1/2018	11/14/2018 - 11/18/2018	11/14/2018 - 11/16/2018	11/14/2018 - 11/16/2018	12/7/2017 - 12/8/2017	12/1/2017 - 12/8/2017	6/13/2019 - 6/14/2019	TOTAL TIONAL TOTAL	SALESCOLD - CALCACACA BARRACA	11/16/2016 - 11/19/2016	11/16/2016 - 11/19/2016	11/16/2016 - 11/19/2016	11/16/2016 - 11/19/2018	11/16/2016 - 11/19/2016	1/29/2018 - 1/31/2018	UZ9V2018 - 1/31/2018	1/29/2018 - 1/31/2018	THE STATE OF TAXABLE AND THE STATE OF THE ST	WINDS - BIOLOGIA	ANTONIA - WINCOLD	STOCKE STOCKE	WHITH THE WAY	12/7/2016 - 12/11/2016	12/1/2016 - 12/11/2016	12/7/2016 - 12/11/2016	12/7/2016 - 12/11/2016	12/7/2016 - 12/11/2016	12772016 - 12/11/2016	2/11/2019 - 2/14/2019	2/11/2019 - 2/14/2019	2/11/2019 - 2/14/2019	2/11/2019 - 2/14/2019	2411/2019 - 2/14/2019
	Location	Tampa, FL	Tampa, Ft.	Washington CC	Washington Or	Washington DC	Bretten 168	Stouton 868	Ecologi, non	Photograph to	Charles In	Charlete, Mc	Charlotte, INC	Charlone, Pt.	Chandra, NC	Charone, MC	Carvelland, On	Observational Observational	Chrotand Oh	Hollywood, Fl.	Helbuseed Fi	I into Court A32	24		l		I on Anonies, CA					Orlando, Fl.			FL			Pittsburgh, PA			Pitsburgh, PA	Pittsburgh, PA	Tallahatare, Ft.	Tallahansee, Ft.	Talkshapsee, R.	Tatanassee, P.	Tellahassee, Pt.	Tellahannan Si	Tulkahanana El	Talkahamana El	Washington DC	Washington DC	Washington DC	Washington DC	Washington DC	Washington DC	Washington DC	Washington DC	Washington DC	Washington DC	Washington DC
		neteln	City Manager Bomstein	1	1	1	Commission Amount	Consisting and	Characteristics of managers	Commission of the Assessment	CONTRACTOR ANTONORO	Commissioner Amoroso	Commissioner Amoroso			1	Commissioner Amoroso		Commissioner Amoroso	П	Commissioner American	Commissioner Amondan	Commissioner Amounto	П	1	L	1	aloner Amomeo		Commissioner Amoroso				Commissioner Amoroso	Commissioner Amoroso	Commissioner America		Commissioner Amoroso					Centralgaloner Aznonoso	Commissioner Amoroso	Commissioner Amoroso	COMMISSIONS AMONDS	Commissioner Amorogo	Commissions Amongs	Commissione Amorato				Commissioner Amoroso		Commissioner Amoroso		Commissioner Amorogo	Commissioner Amorogo	Commissioner Amorpeo	Commissioner Amorbeo	Commissioner Amongo

Yales Tex	Pad			I	I	I	Γ	I		I	I	I	T	I														I		I	I	I					I	T	I	I	I					I	I	I	I							I	I		
Unneces	Costs																																																										
Incorrect Fer Diem!	Mileage																																																										
Lack of Proper	Support												I																																											Ī			
Lack of Proper	Approval	×	*				×		,	×	346			×		×	×	×	×	×	×	×	×	*	×	×	*		* *	×	*	×	×	×	×	×	H.	2 >	4 4			м	×	×	×	×			K		×	×	*	*			346	×	*
- 0	Hern(s)				Ī																																																						
	Course		1	1	Ī																								T											Ī										T									
v	Costs		t										İ											1			1	T	T	T	T						1		T		T				1			T		I				1					1
-	employee)		1																								1	1											T								Ī		T						İ				
7	Costs	2000	3 34.55	20 000 00	S 30.00	\$ 329.40	\$ 1,848,08	\$ 590.00	\$ 64.00	\$ 30.00	\$ 521,00	\$ 1,601.45		30.00	\$ 545.00	\$ 40.00	\$ 36.30	\$ 606.40	8 1,038.00	\$ 30.00	\$ 962.60	\$ 1,659.55	120.50	5 423.40	3000	30.00	0 1,4/1,93	20000	90 00	00'09 \$	5 795.18	\$ 379.17	\$ 229.35	\$ 14.00	\$ 12.00	2000	30.00	21600	2 7 90	\$ 132.87	\$ 406.40	30.00	\$ 1,671.90	\$ 242.00	\$ 725.00	5 568.87	2 1 807 06	8 474 OE	30800	\$ 333.00	\$ 23.00	\$ 393.60	\$ 25.00	5 500.16	S 250.08	\$ 525.00	\$ 225.00	\$ 622.00	00009
		Т	Ť	Congress	Shurtin	Aufare	Lodging	Registration	Room service/hotel restaurant	Shuttle	Airlane	Lodaina	Reditation	Shriette	Registration	Registration	Shurble	Auface	Lodging (deposit)	Shuttle	Airlare	Lodging	Room service/holed nestaurank	Alfare	Baggage fee	Baggage fee	Dadoo1	Sear Opgrade	7 Stannante Fee	7 Bacadon Fee	7 Lodana	7 Lodging		7 Parking	7 Parlang	2017 Parking	7 Prairing - Valor	7 Indiana	7 Lodning apolop fap	7 Requirement	8 Arrare	D18 Baggage Fee	8 Lodging (deposit)	8 Parking	Registration	Rental car	Autigra I colonica	Davistration	(Lodging	B Registration	8 Room service/hotel restaurant	Airlana	Baggage Fee	Looging (balance)	Localina (decorati	Registration	Registration	airfare	Bagaran Fee
	Dates	2711/2019 - 2/14/2019	WINDLY - WINDLY	A 10-711/2010	THURSDITY STANSONT	3/10/2017 - 3/16/2017	3/10/2017 - 3/16/2017	3/10/2017 - 3/16/2017	3/10/2017 - 3/16/2017	3/10/2017 - 3/16/2017	3/10/2018 - 3/15/2018	310/2018 - 3/15/2018	W10/2018 - 3/15/2018	3/10/2018 - 3/15/2018	3/0/2019 - 3/14/2019	3/4/2019 - 3/14/2019	3/9/2019 - 3/14/2019	10/1/2018 - 10/4/2018	10/1/2018 - 10/4/2018	10/1/2018 - 10/4/2018	371/2019 - 3/16/2019	3/3/2019 - 3/14/2019	3/9/2019 - 3/14/2019	9/19/2018 - 9/22/2018	9/19/2018 - 9/22/2018	9/15/2018 - 9/22/2018	STREET STREET	WINKERSON AND STREET	11/1/2017 - 11/19/2017	\$1114/2017 - 11/19/2017	11/14/2017 - 11/19/2017	11/14/2017 - 11/19/2011	11/14/2017 - 11/19/2017	11/14/2017 - 11/19/201	11/14/2017 - 11/19/201	11/14/2017 - 51/19/201	11/14/2017 - 11/19/201	THE COLUMN CONSCIONATION	674447017 - 12/16/201	12/14/2017 - 12/15/201	11/W2018 - 11/11/2018	11/6/2018 - 11/11/2018	11/0/2018 - 11/11/2010	11/6/2018 - 11/11/2011	11/4/2018 - 11/11/201	11AV2018 - 11/11/201	MINISTER - BUTSKING IN	ALTHURAN STANDARD AND AND AND AND AND AND AND AND AND AN	10/24/2018 - 30/24/201	10/24/2018 - 10/25/201	10/24/2018 - 10/25/201	5/15/2018 -5/19/2018	5/15/2016 -5/19/2018	STOSSES STOSSES	6/15/2018 -6/19/2018	5/15/2018 -5/19/2018	5/15/2018 -8/19/2018 Re	3/19/2019 - 3/22/2019	3/19/2019 - 3/23/2019
	Location	Washington DC	W. Berungton 1.A.	Wathington DC	Washington DC						Washington DC						Washington DC						00.				BOSTON, MAR.	-		Charlotte, NC	Charlotte, NC						Charlotte, NC	do 60	da		1 CA	T	Los Angeles, CA	П	T	T	Louisville, KV	W. P.	a	Seach, FL	Beach, FL.						Savannah, GA		Yollahassee, Ft.
			Commissioner Amoroso	1					L				T		ı								Commissioner Amonoso						Commissional Mardy		Contrassioner Hanty						Commissioner Hardy	Commissioner Hardy	Commissioner Hardy	Commissioner Hardy	Commissioner Hardy						Commissioner Hardy	T						Commissioner Hardy					Commissioner Handy

To See	200	1		T	T	T	T						T	I	T	T	T	T	T	I	T		T	I	I															1																											
Unneces	5																																																																		
Incorrect Per Diem /	Mileage																																																																		
Proper of	Support			Ī	Ī	Ī									Ī	Ī			Ī	Ī	Ī		Ī	1	Ť			Ī																																							
Lack of Proper	Approvat	×	×	bet.	340	×	M	×	×	×	16	×	H					24	×	. 3	2	3	4 8	4 1	K	×	×	×	M	×	le:	×	×	×	×	×	×	×	×	be	×	×	×	35	×	345	36	×	×	×	×	36	34	ж	×	34	30	ж	×	×	×	×	34	×	240	34	×
Prohibited	Estate (s)																								Ī																																										
Andreas	Costs														Ī					Ī	Ī		Ī	Ī																																											
9	Costs		1			1				_										l	t			t	1	1	1	1												_																						l					
vestioned oets (due to	(aekoldu)																							1		1																																									
Overstoned	Conts	\$ 640.70	9 245 00	2 160.00		07 707 0	200.00	276.00	\$ 40.00	\$ 525.00	8 20.00	\$ 406.40	S 1.003.14	90 00 3	00 828 00	59077	2000	\$ 240.00	\$ 142.40	908	\$ 225,00	\$ 62 Ke	200,000	00.000	3 172.00	12.00	\$ 165.30	\$ 12.09	\$ 354.00	10.00	\$ 525.00	\$ 268.70	\$ 1995.00	\$ 203.17	\$ 478.00	\$ 15.00	\$ 478.00	\$ 10.00	00'051 \$	\$ 63.00	\$ 1,150.00	\$ 48.00	Н	16.00	П	\$ 150.00	\$ 650.00	\$ 242.00	\$ 233.30	\$ 572.46	\$ 395.42	385.60	\$ 332.21	\$ 495.00	\$ 278.30	\$ 167.00	\$ 754.40	3.66	\$ 379.70	\$ 684.64	\$ 545,00	8.00	\$ 100.00	\$ 447.00	\$ 158.53	\$ 100.00	Г
Providence		Lodging/Airfans/Rental Car	Registration	Registration	Antare	Logging	100	Lodging	Parising - self	Registration	Paciery Services Restaurant	Airface	Lodoling	Parking and	(Zamintrution)	Opposite and	Beens Cardenhireal medatorian	Located	Lodning (decess)	Parking conf		Arthite	Danistation		Suita Contract of the Contract	Parising - dept		Parking - self	Lodging		Registration		8	Rental Car	Lodging	Room Service/Hiptel revisiouraes.	Lodging (deposit)	Parking - solf	Regultation	Room Service/Hotel #Waterast	Lodging			Parking - setf	Registration	Registration	Hagistration	Altfare	Aarlans	Lodging	Ladging	Airfare	Lodging	Registration	Airfare	Alriano	Lodging	Poloatina feet	Aufana	Lodging	Registration	Room Service/Hotel restaurant			Lodging	Parleng - volet	Registration
Į	Dates	11/14/2017 - 11/18/2017	11/14/2017 - 11/19/2017	11/14/2017 - 11/18/2017	7/25/2018 - 7/28/2018	7/25/2016 - 3/26/2018	772572018 - 7728/2018	8/16/2018 - 8/18/2018	8/16/2018 - 8/18/2018	B/16/2018 - 8/18/2018	B/16/2018 - 8/18/2018	\$107018 - 11/10/2018	11770015 - 11107018	**************************************	artificate 4 stratistic	and the same of th	810COUTS - 111COUTS	7/19/2017 - 7/25/2017 IL	12/7/2017 - 12/8/2017		TABCARCE TABCATCO		Available available	ACCUPATION OF THE PARTY OF	W124019-90144019	W13/2019 - M14/2019		7/18/2019 - 7/19/2019	6/17/2017 - 8/19/2017	8/17/2017 - 8/19/2017	W17/2017 - 8/19/2017	11/16/2016 - 11/20/2016	11/16/2016 - 11/20/2016	11/16/2016 - 11/20/2016	1/29/2018 - 1/31/2018	1/29/2018 - 1/31/2018	1/8/2018 - 1/10/2018	1/8/2018 - 1/10/2018	1/8/2018 - 1/10/2018		3/24/2019 - 3/28/2019	3/24/2019 - 3/28/2019	3/5/2019 - 3/7/2019	3/5/2019 - 3/7/2019		3/6/2017 - 3/6/2017	1116/2017 - 1/21/2017	2/11/2019 2/14/2019	2/11/2019 - 2/14/2019 A	2/11/2019 - 2/14/2019	2/11/2019 - 2/14/2019	3/WZ019 - 3/14/2019	39/2019 - 3/14/2019	3/8/2019 - 3/14/2019	6/2/2019 - 6/7/2019	672/2019 - 6/7/2019	6/2/2019 - 6/7/2019	672/2019 - 6/7/2019	11/15/2016 - 11/19/2016	11/15/2016 - 11/19/2016	11/15/2016 - 11/19/2016	11/15/2018 - 11/19/2016	14/14/2017 - 14/19/2017	8/16/2018 - 8/18/2018	8/16/2018 - 8/18/2018	01102618 - 211822618	S/16/2018 - 8/18/2018
	Location	Charlotte, NC	Charlotte, NC	Chartoffe, 94C	Detano, Mile	Delano, set	Deland, MM	Hollywood, Ft.	Hollywood, Ft.	Hollywood, FL	Hollwacod, Ft.	I on Angeles CA	Con Angelow CA	I on American Ca	Il on decorbes PA	To designation of	ton Annahus CA	Order Fi	Ordando El	Orlando Bi	Oriento El	Ortande El	Columbia El	Oriando, r.	Orlando, r.L.	Orlando, Ft.	Ortando, Fi.	Orlando, Fl.	Orlando, FL	Orlando, FL	Ortando, Ft.	Pittsburgh, P.A.	Pittsburgh, PA	Pitsburgh, PA	Taffahassee, Ft.	Tallahassee, Ft.	Tallahassee, FL	Tallahassee, Ft.	Tallahassee, Ft.	Taffahassee, Ft.	Tallahassee, Ft.	Taffathannee, Ft.	Taffarhassee, Ft.	Taffahassee, Ft.	Tallahassee, Ft.	Tafahansne, Ft.	Washington DC	Washington DC	Washington DC	Washington DC	Washington DC	Washington, DC	Washington, OC	Washington, DC	Washington, DC	Washington, DC	Washington, DC	Washington, DC	Pittsburgh, PA	Pittsburgh, PA	PRISburgh, PA	Prisburgh, PA	Charlotte, MC	Hollywood, FL.	Hollywood, Ft.	Helbound FI	Hollywood, Ft.
					Committee one Manawill	Commissions Maxwell	Commissional Maxwell	Contralisationer Maxwell	Commissioner Maxwell	Commissioner Maxwell	Carterial account Mancarell			ı	Commissioner Manness	ı		L	Continue income Man record	Commence of the county	Control of the control	Commercial Commercial	CONTINUES CONTINUES CONTINUES	CONTRESIONER INSXWOR	CONTRACTOR SECURITY AND NAMED IN	Commissioner Maxwell	Commissioner Maxiwall	Convenience Maxwell	Commissioner Manwell	Commissioner Maxwell	Commissioner Mexwell	Commissioner Maxwell		Commissioner Maxwell	Commissioner Maxwell	Commissioner Naxwell	Commissioner Maxwell	Commissioner Maxwell	Commissioner Maxwell	Commissioner Moorwell	Commissioner Nescoved	Cornenissioner Maxwell	Commissioner Maxwell	Commissioner Meximen	Commissioner Maximil	Commissioner Maxwell	Commissioner Maximil	Commissioner Manuscil	Commissioner Manuell	j	pance		Commissioner Maxwell				Commissioner McVov	Commissioner McVov	Commissioner Robinson	Commissioner Robinson	Commissioner Robinson	Consistence Robinson	Commissioner Robinson				

Sales Tax	Paid			I	I					I	T	T								I	I	I												I				I	I	I				I	I	I	I	I	I							I		T	I
Unneces	Costs																																																										
Incerrect Per Diem I	Milesge																																																				×	×	×		4 3		
Lack of Proper	Bupport				Ī	Ī																												I				*		*	×	×	×		4 3		. 34				×	×				T			Ī
Leck of Proper	Approvaí	×	×	*		×	*	×	*			×	*	×	×	×	×	×	×	×	* *		×	×	×	×	×	×	×	×	×	×	× ,	* *	×	×	×	×																					
Prohibited	Hern(s)																																																										
4	Costs			Ī	Ī							\$ 189.00	\$ 525.00		\$ 50.00		\$ 700.00																												402.00	3.48						\$ 9.00	\$ 66.00	\$ 45.00	20,00	45.00	24.00	8 60.00	
Identified	Couts			Ī	İ					Ī									1														T	T				Ī						T	90 107 3		\$ 24.00		\$ 29.00	\$ 30,00	\$ 95.15	\$ 9.00		2 45.00	2 46.00	45.66	24.00	\$ 60.00	20.00
Questioned Costs (due	(eachddus)		1	Ī	Ī					Ī										Ī		İ																																			Ī		
	Costs	\$ 493.76	575.00	204,00		8 476.00	\$ 150.00		5 1,888.45			\$ 189.00					200.00	\$ 478.00	344.28	27900	070 070	368.00	3000	\$ 666.20	8 1,301.49	\$ 1,234,31	\$ 650.00	\$ 346.40	\$ 25.00	8 00	36.00		20.00		\$ 308.30	4.54	200.00	00009	676	\$ 12.19	\$ 24.00	\$ 25.31	16.09	10.79	20.00				Ī						Ī		Ī	Ī	İ
		Airt	-	December	+	•-	100	•			7 Recintration	Lodging (deposit - partial refund)		Registration - cancellation les	2 Registration	16 Arfare	6 Registration		Codging	_	_	+-		+-	-	-				8 Breakfast per diem		_	B. Illumin Seriologichal need authority		-	9 Priceline fee	Registration	Hannane Fae	7 Media	7 Meals		П	1	Tax	1 ave	17 Parkino - sizod		Baggange Fee	1	1	8 Taxi	5 unknown			17 I seeds not dien.		Resaltant per diera	7 Dinner par clero	I.
	Dates	Gr11/2019 - 6/16/2019	W11/2019 - 6/26/2019	BUTTON - GITSON	S14/2018 - 5/20/2018	1/8/2018 - 1/10/2018	1/8/2018 - 1/10/2018	67772018 - 6/12/2018	677,2018 - 6/12/2018	W772018 - 6/12/2016	11/14/1017 11/19/20	B16/2018 - 8/16/2018	8/16/2018 - 8/18/2018	4/25/2017	8/15/2019 - 8/17/2019	11/15/2016 - 11/20/20	11/15/2016 - 11/20/2016	1/23/2018 -1/24/2018	1/23/2018 -1/24/2018	TOTAL STOCKE	BLOSSING-BLOSSING	3/3/2019 - 3/5/2010	3/3/2019 - 3/5/2019	1/16/2017 - 1/21/201	1/16/2017 - 1/21/201	1/16/2017 - 1/21/2017	1116/2017 - 1/21/2017	9/10/2016 - 9/21/2018	9/19/2018 - 9/21/2018	9119/2018 - 9/23/201	9V19V2018 - 9/21/2018	W1942018 - 9/21/203	GHG/2018 - S/21/2018	1/23/2019 - 1/25/201	1/22/2019 - 1/25/201	1/22/2019 - 1/25/201	102/2019 - 1125/201	17222019 - 17232019 11442011 - 17232019	V162017 - 1/23/201	V162017 - 1/2(/2017	1/16/2017 - 1/2 8/2017	1/16/2017 - 1/21/2017	1/16/2017 - 1/21/2017	AMERICA - MEMBER	47507018 - 5726704	11/14/2017 - 11/18/2017	7/19/2017 - 7/21/2017	\$14/2018 - 5/20/201	9/14/2018 - 5/20/2018	6/26/2019 - 7/3/2019	9/19/2018 - 9/21/2018	9/19/2018 - 9/21/201	5/31/2017 - 6/3/2017	11/14/2017 - 17/19/20	11046017 - 11060111	11/4/2017 - 11/16/20	7119/2017 - 7/21/2017	7192017 - 7/21/2017	A STATE OF THE PARTY OF THE PAR
	Location	Louisvine, KV	Louisvine, KY	Outside Et	Savantali GA	Yallahaussee, FL	Tallshessee, FL	Boston, MA	Boston, 86A	Bosine MA	Charledin St.	Hollywood, Ft.	Hoffwood, FL	Mami, F.L.	Orlando, F.L.	Pithburgh, P.A.	Pittsburgh, PA.	Taffahansee, Ft.	Tallathassee, FL	Tallahassee, P.L.	Tallahassase, Ft.	Tallahatson Fi	Tallahassee, P.	Washington DC	Washington DC	Washington DC	Washington DC	Washington DC	Washington DC	Washington DC	Washington DC	Washington OC	Washington DC	Washington DC	Washington, DC	Washington, DC	Washington, DC	Washington, DC	Washington DC	Washington DC	Washington DC	Washington DC	Washington DC	Washington DC	Tallahmedan El	Charlotte, NC	October Fi.	Savannah, GA	Savannah, GA	Honolutu, Hil	Washington DC	Washington DC		Charlotte, MC	Charlena MC	Charlotte, NC	Copes, FL	Ocoee, FL.	100
	= 11	Commissioner Robinson	- 1		1	Commissioner Robinson	Commissioner Robinson	Mayor Triolo	Mayor Tricko	Maver Triolo				Mayor Triolo	Mayor Triolo	Mayor Trialo	Mayor Triolo	Mayor Triolo			Mayor Incib			Mayor Triolo		Mayor Triolo				Mayor Triolo		Militayov Trickio	Mayor Indio		1	1 1		Mayor Ingle		1		l	ç	City Manager Bornstein	Cary manager Donasson		Commissioner Maxwell	Commissioner Robinson	Commissioner Robinson	Mayor Triolo	Mayor Triolo	Mayor Tricilo	City Manager Bomstein	Commissioner Amoroso	Commissioner Hardy	Commissioner Maxwell	Commissioner Maxwell		١

Sales	Pald			T	T							T	I				T	T	T							T	T					T	I					×	×	×	× >	×	×	×	×	×	×	4 3	×	×	×	×	×	M 1	1
Unneces	Costs			Ī								ac a	e 2	34	×	34	×	10 3	2 30	×	ж	×	×	×	×	4 3	¢ ×	200	×	ж	×	×	e ×	×	×	26 2	× ×																		T
incorrect Per Diem /	Mileage	×	×	×	. 24	ж	Ж	ж	×	Ж	×																																												
Lack of Proper	Support																														I					Ī				I							I	Ī					T	I	
Lack of Proper	Approval		1	T	Ī					1		1	T				Ī	T								T						T	Ī			T							T					T					T		
Problèmed	-																																			Ī																			Ī
Avoidable	ပိ	Ш	- 1	16.30		Ш		Ш	П	15.00	Ш		1		ш	15.84	40.00	105.00	243.00	П		ш	8.8	116.33	409.20	80.00	412.84	177.00	525.00	383,91	250.00			ш	ш	269,00		1 1		- 1		1				- 1	- 1						- 1		40.00
dentified	-	18.00	15.00	2 14.30 6	24.00	45.00	0.85	46.54		15.00	\$ 15.00 \$	0 4	9	59	1/1	90	40	6 4	96	41	89	49	\$5	10 4	10	9	69	98	66	40	44 0	A W	60	15	40	90 40	90	20.50	64.19	12,40	2 111 8	119.46				- 1	- 1					\$ 55.72 \$	- 1		4 07.00
Questioned Costs (due	(eakajame							-	\$ 16.00								1	Ī	Ī												Ī						Ī			1														Ī	
Questioned	Costs										000000000000000000000000000000000000000		\$ 60.75	\$ 69.75				104.00							40920				\$ 525.00					П		269.00		П																	
	Description	Breakfast per dem		Milance	Bresiden per diens	Lunch per diem	Milenge	Mikage	Breakfast per ellem	Lurch per dlem	Lunch per diem	Т	Lodging (Ballance) (Discount calc) as	Т	П	Parting - valet (Valet used when self-parting) available)	Coupring (Lincount 1994) for a coupring	Renistration (Discount rate and editained)		Lodging (3/25-3/26/2019) (Trip cancelled withhat explanation)	Lodging (Trip cancelled without explanation)		Parking - valet (Valet used when self-parking available)		Artane (More economical artane Bot doleaned)	Т		Т		Lodging (More economical lodging not obtained)	Registration (Trip cancelled without explanation)	10 Longing - Carbonacios perseny (170 Carbonis wascus expensions) O Partino valed (Vite) send when easilinesting acadia/date	16 Parting - valet (valet used when self-parking available)		Airlare (More economical airlare not obtained)	Codging (Trip cancelled without explanation) Remistration (Tris prepalled without explanation)	Lodging (balance) (Discount cate not obtained)	Lodging - cancellation fee	Lodging - Abolt	Lodging (3/24-3/27/2019)	Parking - volet	Lodaing	Lodging	Parking	Lodging (deposit)		7	Longing (orpores)	Lodging	Lodging			HOOM SEVECENSING THE LAND AND AND AND AND AND AND AND AND AND		Darking and
	Define	12/8/2016 - 12/9/2018	(2/a/2016 - 12/9/2016	THE COID - THE COLORS	V16/2017 - 1/21/2017	1/16/2017 - 1/21/2017	V16/2017 - 1/21/2017	2/6/2017 - 2/8/2017	5/14/2018 - 5/20/2018	S14/2018 - 5/20/2018	WINZOIS - WZ WZ WZ 10 TO	GUTTOTER - 0712/2018	57207019 - 6/1/2016	5/23/2019 - 6/1/2019	5/29/2019 - 6/1/2019	5/20/2019 - 6/1/2019	SCHOOL STATES	STANDAR - STANDARDE	3/24/2019 - 3/27/2019	324/2019 - 3/27/2019	3/6/2017 - 3/8/2017	3/6/2017 - 3/6/2017	11/14/2017 - 11/19/2017	11/6/2018 - 11/10/2018	11/6/2018 - 11/11/2018	SP1022018 - 9/22/2018	11/6/2016 - 11/11/2018	E spec	20	11/7/2018 - 11/10/2018	11/14/2018 - 11/16/2018	ANTAGO - 9100ANTE		11/15/2016 - 11/19/2016	£14/2018 - 5/20/2018	WITTOHT - 3/9/2017	1/16/2017 - 1/21/2017	4/17/2019	1/21/2010 - 1/22/2010	3/24/2019 - 3/27/2019	3/2/2019 - 3/4/2019	3ALZ017 - 3/8/2017	9192019 - 9/21/2019	9/19/2019 - 9/21/2019	N16/2018 - 8/19/2018	11/14/2018 - 11/16/2018	TUTALCUIS - TIMPACUIS	611372010 - 81472019	W1772017 - 8/19/2017	345/2019 - 3/7/2019	12/14/2017 - 12/15/2017	10/24/2018 - 10/25/2016	ANTONIA - TURSYZOTO	STREETS - STREETS STREETS	ALCOURT & STRUCTURE
	December	Orlando, PL	Orlando, F.L.	Feliphogo, FA	Washington DC	Washington DC	Washington DC	Washington DC	Savannah, QA	Savernah, CA	Washington DC	Boston, Mr.	Orlando R	Orlando, Fl.	Orlando, FL	Orlando, Ft.	Originals, P.	Pitterhumb ØA	Tollachastelee, P.	Talkahanseye, Fl.	Talkshausee, FL.	Tuffeithassee, FL	Charlotte, NC	Los Angeles, CA	Los Angeles, CA	Boston, 886.	Los Angeles, CA	Orlando, FL.	ď	Los Angeles, CA	Odando, FL	Orlando, F.C.	Pittsburgh, PA	Pittsburgh, PA	Sirvannah, CA	Tallahasaaa Fi.	Washington DC	Tallahestee, Ft.	Tallahistace, Ft.	Traffathusbance, F.L.	Tallahmann Fi.	Tallahassee, Fl.	Cleanwater Beach, FL	Clearwater Beach, FL	Hothwood, Ft.	Orlando, F.L.	Criendo, F.	Oriendo Fi	Orlando, Ft.	Taffahnusse, Pt.	Fort Lauderdale, Ft.	T	Ī	i i	
	Travelor	Commissioner Maxwell	Commissioner Maxwell	Commissioner Marchael					Commissioner Robinson	Commissioner Robinson	Mayor Triolo	Cary Manager Bornager	Sty Manager Bornatein	City Manager Bornstein	City Manager Bornstein	City Manager Bornstein	Acy Manager Bornstein	City Manager Domestein	City Manager Bornstein	City Manager Bornstein	City Manager Bornetein	City Manager Bonstein	Commissioner Amoroso	Commissioner Amorogo	Commissioner Amorbso	Commissioner Hardy	Commissioner Hardy	Commissioner Hardy	Commissioner Hardy	Commissioner Maximust	Commissioner Maxwell	Commissions Maxwell	Commissioner Maxwell	Commissioner McVoy	r Robinson	Mayor Triolo				City Manager Bomssein		City Manager Bonsslein		Commissioner Amorogo	Commissioner Amoroso	Commissioner Amorogo	Commissioner Amongo	Commissioner Amoroso	Commissioner Amorbão	Commissioner Amoroso	Commissioner Hardy	Commissioner Hardy	Commissions Hardy	Commissioner Manual	Commission of the court

Safes	Paid	×	H	×	×	×	×	×	×	×	ж	×	
Unneces	Costs												
Incorrect Unneces	Mileage												
Lack of	Support												
Lack of	Approval												
	Rem(s) Approval												
	Costs	10	E SA	100	100		18	\$ 72.26			\$ 44.26	\$ 48.25	13,667,62
	Couts	\$ 19.58	19.91	\$ 0.60	\$ 22.38	\$ 22,32	16.0 8	\$ 72.26	13.31	8 6,00 8	\$ 44,26	\$ 48.25	5 3,242,46 1
9 .	employee)												16.00
	Costs												Total \$ 103,457,55 \$
	Description	8 Lodging - cancellation penalty	Lodging (deposit)	Parking - self.	Lodging	Lodging (deposit)	Parking - sett	Lodging	Lodging	Parking - valet	Lodging	Lodging	
	Dates	11/15/2018 - 11/16/2018	12/7/2017 - 12/8/2017	12/7/2017 - 12/8/2017	6/13/2019 - 6/14/2019	7/16/2019 - 7/19/2019	7/18/2019 - 7/19/2019	3/5/2019 - 3/7/2019	3/6/2017 - 3/6/2017	8/16/2018 - 8/18/2018	8/17/2017 - 8/19/2017	3/3/2019 - 3/5/2019	
	Location	Orlando, Fil.	Orlando, FL	Orlando, Fl.	Orlando, FL	Orlando, FL	Ortando, FL.	Tellehassee, FL	Tallehaesee, Ft.	Hallywood, Ft.	Orlando, FL.	Tallehoppee, FL	
	Traveler	Commissioner Maxwell	Commissioner Naxwell	Commissioner Maxwell Commissioner Maxwell	Commissioner Robinson	Commissioner Robinson	Mayor Triblo						

ATTACHMENT 1



CITY MANAGER'S OFFICE 7 NORTH DIXIE HIGHWAY LAKE WORTH BEACH, FL 33460

September 9, 2021

Hilary Bojan, Director of Audit Office of Inspector General, Palm Beach County PO Box 16568 West Palm Beach, FL 33416-6568

Dear Ms. Bojan,

As a result of the allegation that City Commissioners (i.e. Commissioners Andy Amoroso and Scott Maxwell) and the City Manager take personal trips paid with City funds, an investigatory review was conducted. The allegation is reported as **not supported**. All 101 trips audited had sufficient documentation to support a business purpose for the travel. Sufficient evidence was not found to support that the travelers used City funds to take personal trips as stated in the allegation. The City responds to the resulting five (5) findings below.

City Management will implement an annual travel training schedule, which shall include training at time of hire, for all City employees. This training shall encompass items outlined in the City's Travel Resolution, Travel Policies and Procedures, Purchasing Card Policies and Procedures, and other associated travel reimbursement policies and procedures. The training will include an employee's attestation that they received training and understand their responsibilities as a City Employee relative to Travel Policies, Procedures, requirements, and responsibilities. Additionally, the Finance Department shall address oversight deficiencies associated with travel reimbursements and vendor payments.



Finding (1): The City Commissioners, Mayor, and Manager's travel was not properly approved and included reimbursements for personal travel expenses totaling \$962.50.

Recommendations:

- (1) The City comply with the City's Travel Resolution, Travel Policy, Travel Procedures, and Purchasing Card Procedures.
- (2) The City develop an adequate training program for travelers and individuals preparing and/or processing travel expense reports for travelers or require that they acknowledge their understanding of the Travel Resolution, Travel Policy, and Travel Procedures requirements and responsibilities.

Management Response (1):

City Management shall implement an annual travel training schedule; including, training at time of hire, for all City employees. This training shall encompass items outlined in the City's Travel Resolution, Travel Policies and Procedures, Purchasing Card Policies and Procedures and other associated travel reimbursement policies and procedures. The training will include an employee's attestation that they received training and understand their responsibilities as a City Employee relative to Travel Policies, Procedures, requirements and responsibilities. Additionally, the Finance Department shall address oversight deficiencies associated with travel reimbursements and vendor payments.

Finding (2): The City Commissioners, Mayor, and Manager often did not comply with the City's Travel Resolution, Travel Policy, Travel Procedures, and Purchasing Card Procedures and incurred unnecessary costs.

Recommendations:

- (3) The City consider recouping \$985.50 incorrectly reimbursed to travelers for travel expenses that were disallowed or prohibited by the City's Travel Resolution, Travel Policy, and/or Travel Procedures.
- (4) The City consider recouping \$708.63 incorrectly reimbursed to travelers for travel expenses that lacked sufficient documentation, as required.
- (5) The City recoup \$538.69 incorrectly reimbursed or advanced to travelers for incorrect per diem meal and mileage amounts.
- (6) The City consider reimbursing traveler \$16.00 for the per diem meal amount incorrectly deducted from the travel reimbursement.
- (7) The City consider obtaining reimbursement for the \$1,009.63 incorrectly paid for Florida Sales tax to vendors.

Management Response (2):

The activity outlined above includes several individuals no-longer employed by the City. As such, it is unlikely that the City will be successful in recouping amounts incurred by those individuals. However, management will evaluate and address the items associated with current employees; Commissioners Robinson and McVoy.

2 of 4| Page

Finding (3): The City Manager Promotional Activities Account purchasing card expenditures lacked adequate review and oversight

Recommendation:

(3) The City designate an independent approver for the City Manager's purchasing card purchases and update the Purchasing Card Policies and Procedures to reflect the designated reviewer.

Management Response (3):

Management agrees that all purchasing card activity should be independently reviewed; including, activity incurred by the City Manager. Management shall evaluate the most efficient means and position to address this observation, and will update the appropriate policies and procedures as necessary.

Finding (4): The City lacks adequate written guidance for IT processes.

Corrective Action

During the audit, the City provided the following IT policies and procedure:

- Acceptable Use Policy
- Cyber Security Policy
- Password Policy
- Overall Technology Policy Regarding E-Mail, Voice Mail, Internet and Computer Systems
- Internet Usage and Systems Monitoring Policy
- Procedure for Control of SunGard Public Sector Naviline System Access
- · Third Party Remote Access Cyber Security Policy
- · Third-Party Security Policy

Recommendations:

- (8) The City develop and implement written IT policies and procedures to ensure consistency of operations that provide guidance, at a minimum, for how to:
 - Assign and remove user rights and a reasonable time for removal when access is no longer appropriate,
 - b. Authorize user access,
 - c. Limit system access by requiring unique user IDs and passwords, and
 - d. Provide for user change management (new and separated employees).
- (9) The City provide staff training for the IT policies and procedures, as needed.

Management Response (4):

Management agrees with the necessity of having strong IT policies and procedures as identified above along with associated training. In this vain, Management shall continue to evaluate areas of weakness and update City Policies and Procedures where/when necessary.

3 of 4 | Page



Recommendation:

(11) The City consolidate and retain the City Commissioner's, Mayor, and Manager's travel records by traveler and trip and reconcile traveler Training or Travel Authorization and Expense Report Forms to purchasing card and cash disbursement records to ensure all applicable travel expenditures are reported and related expenditure documentation is included as support.

Management Response (5):

The City shall update its accounting and accounts payable operating procedures to require that travel is properly authorized and expenditure activity is sufficiently documented and reconciled. Furthermore, this documentation will be filed and retained as part of the City's document retention policies and procedures.

As itemized above, the City will pursue implementation of your recommendations.

Sincerely,

Juan Ruiz Interim City Manager

Cc: John A Carey, Inspector General
Bruce Miller, Director, Financial Services Department
Nelly Peralta, Assistant Director, Information Technology Department
Linda Connor, Auditor II
Jess Savidge, Strategic Improvement Project Manager

4 of 4 | Page