

Internal Audit Report

2025-04 - OCEAN CENTER PARKING OPERATIONS

Jonathan P. Edwards, CIA, CPFO Internal Auditor 123 West Indiana Avenue DeLand, Florida 32720 **July 29, 2025**

Report Highlights

Why We Performed This Audit

The Ocean Center generated \$3.6 million in parking revenues and hosted more than 500,000 guests at 118 events during 2024. We wanted to ensure adequate internal controls existed over parking operations and that LAZ Parking, the concessionaire, complied with agreement terms and maintained proper revenue collection procedures.

What We Found

Significant internal control weaknesses create opportunities for revenue skimming and compromise employee safety. LAZ uses inadequate cash handling procedures, shared payment devices with generic logins, and lacks proper oversight of attendant activities. Attendants can accept cash without documentation, position themselves to obstruct security cameras, and operate without adequate management supervision. Safety risks include exposure to traffic hazards, inclement weather, and inadequate safety clothing. Additionally, LAZ has failed to provide the required contract deliverables, including audited financial statements, customer surveys, and independent bank statements. Furthermore, the Ocean Center staff lacks written procedures and an understanding of contract oversight.

We Recommend

Strengthening parking operations through enhanced internal controls, improved safety measures, and better contract administration. Key recommendations include discontinuing cash payments, installing license plate readers, assigning individual login credentials for payment devices, and providing adequate safety equipment and shelter for employees. Additionally, ensure LAZ provides all required contract deliverables, establishes written procedures, and implements proper monitoring of operational performance to protect revenue integrity and employee safety.

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Internal Auditor

July 29, 2025

Honorable Members of the County Council and County Manager:

I am pleased to present the audit report 2025-04 Ocean Center Parking Operations. The purpose of this audit was to assess, with a reasonable degree of assurance, that internal controls related to the management of the parking facilities at the Ocean Center were operating efficiently, effectively, and in compliance with laws, regulations, contracts, and policies. The audit scope encompassed activities from February 1, 2025, to April 30, 2025.

This audit was conducted in accordance with the *Global Internal Audit Standards*. Those standards require that I plan and perform the audit to obtain sufficient and appropriate evidence, providing a reasonable basis for my findings and conclusions based on the audit objectives. The evidence obtained provides a reasonable basis for my findings and conclusions. The audit was conducted from February to May 2025. Svetlana Ries, CFE, assisted with the audit work.

This audit was successful due to the assistance of the staff at the Ocean Center and LAZ Parking. We appreciate their support. All audit reports are available on the County's website at: volusia.org/auditor.

Jonathan Edwards, CIA, CPFO Internal Auditor

Background

The Ocean Center, Florida's fifth-largest convention center, is located 400 feet from the Atlantic Ocean in Daytona Beach and is owned and operated by Volusia County. The venue offers more than 200,000 square feet of event space, including a 42,000-square-foot arena (8,000 seats), a 93,000-square-foot exhibit hall (500-plus booths), a 14,000-square-foot ballroom, and 32,000 square feet in meeting rooms. The Ocean Center employs 51 full-time staff.

Originally opening in 1985 as an arena/concert hall, the Ocean Center hosted high-profile artists and events. Following a \$76 million expansion in 2009 that added a new exhibit hall and meeting spaces, the facility shifted focus to conventions, conferences, and sporting events. In 2024, as it celebrates its 40th anniversary, the County Council directed staff to diversify programming and return to the venue's entertainment roots while modernizing facilities.

In 2024, it set a record-breaking 118 events, attracting over 513,000 guests, and generated 88,000 hotel room nights. According to staff, this resulted in over \$114 million in economic benefit, supporting 980 jobs and contributing \$1.9 million in sales tax revenues. The Ocean Center continues to host a dynamic array of events, ranging from national sports tourism to large-scale trade shows, while also returning to its entertainment roots in 2025.

The Ocean Center's 6-story parking garage provides 1,374 spaces across 552,000 square feet. Two additional surface lots add over 650 spaces for event overflow, located immediately west and south of the facility, as depicted in Figure 1. The parking garage is available 24 hours a day, 7 days a week.



Figure 1: Map of the Ocean Center, Parking Garage, and Parking Lots

In December 2018, the County entered a 10-year concessionaire agreement with LAZ Florida Parking, LLC ("LAZ"). LAZ agreed to manage and operate the parking facilities. This included procuring, installing, operating, managing, and maintaining a modern, proven, reliable revenue control system and all related facilities and equipment. LAZ is responsible for all transaction fees, fraudulent transactions, chargebacks, or other refund transactions.

LAZ agreed to serve as the operational manager, providing quality personnel and managing all equipment installations. They are responsible for the maintenance and supplies of the revenue control system (i.e., parking operations) and all related equipment and software. LAZ agreed to provide the County with free management consulting services for equipment upgrades and best practices on parking operations.

Each month, LAZ remits parking revenue to the Ocean Center. Ocean Center staff have access to LAZ's web-based reporting system and can generate reports to reconcile revenue reports. The parking facilities generated revenues of \$2.9 million (Fiscal Year 2023) and \$3.6 million (Fiscal Year 2024). Appendix 1 provides the financial activity for the parking facilities for FY 2020 through FY 2024.

The Peabody Auditorium ("Peabody"), a 2,500-seat venue owned by the City of Daytona Beach and located across from the Ocean Center, also utilizes these parking facilities (see Figure 1). Management of the Ocean Center and Peabody agreed to charge \$10 for parking and accept cash as a payment method to accommodate the Peabody's patron demographics.

The County Council approved updating the Ocean Center's parking rates on February 18, 2025, to simplify the rate structure and remain competitive. On May 6, 2025, the County Council approved increasing the monthly parking rates for nearby businesses and their employees who park in the garage.



Scope and Methodologies

On January 9, 2025, the County Council approved the 2025 Audit Plan, which included auditing the parking operations at the Ocean Center. The primary objective was to evaluate the adequacy and effectiveness of internal controls over parking revenue.

Specific audit objectives were:

- To determine if the Ocean Center staff maintained adequate controls to monitor parking operations and LAZ's performance.
- To assess LAZ's internal controls over facility operations, maintenance, and management.
- To assess whether LAZ complied with the parking concession agreement.
- To assess compliance with applicable laws, regulations, contracts, best practices, and policies.
- To identify opportunities for improvement.

Audit procedures to accomplish these objectives included:

- Reviewed relevant state statutes, county ordinances, policies and procedures, and best practices.
- Assessed the adequacy of the County's internal controls over parking activities.
- Interviewed various County and LAZ staff.
- Observed LAZ parking attendants collect revenue during the events listed in Table 1.

Our audit procedures focused on activities from February 1 through April 30, 2025. We judgmentally selected specific events during this period for direct observation, working alongside parking attendants during the dates and times listed in Table 1.

Table 1: Audit Observation Dates and Times

Observed Date	Observed Times	Events		
		- FL Federation of Colorguard Circuit Championships		
3/28/25 Friday	12 p.m. – 6 p.m.	- Setup for FL Saltwater Fishing Expo		
3/30/25 Sunday	10 a.m. – 2 p.m.	- FL Federation of Colorguard Circuit Championships		
		- NCA & NDA College National Championships		
4/10/25 Thursday	3 p.m. – 8 p.m.	- Frankie Valli concert at Peabody Auditorium		
4/11/25 Friday	8 a.m. – 11 a.m.	- NCA & NDA College National Championships		

Findings and Recommendations

1. INADEQUATE CONTROLS EXPOSE PARKING OPERATIONS TO REVENUE LOSS, FRAUD, AND SAFETY RISKS

Current parking operations at the Ocean Center have significant internal control weaknesses that create opportunities for revenue skimming. Inadequate cash handling procedures, a lack of management oversight, and safety concerns compound the risk of fraud. These operational failures not only jeopardize revenue integrity but also create poor customer experiences.

Current Management Practices Create Opportunities for Employees to Skim Revenues

During the Peabody events, attendants are to ask the patrons which event they are attending before initiating the transaction. Depending on the event, parking prices and payment methods vary, which creates complications, including cash acceptance and price differences.

- o Peabody events cost \$10, and cash or electronic payments are accepted.
- Ocean Center events cost \$15 and only accept electronic payments.

The price difference for these events causes patrons to become upset and leads to a poor customer experience. It was observed that numerous customers became angry when informed that the Ocean Center only accepts credit and debit cards. Customers accused staff of attempting to defraud them after observing other patrons paying in cash and only charging \$10. The customers' confusion and irritation caused parking entrance lines to grow, further deteriorating the overall experience.

Skimming is an employee accepting payment from the customer, deliberately not logging the transaction, and pocketing the money for personal use.

Multi-Person Fraud
2 People, 2 Parking Lots

\$180k

It only takes...

3 Events/Month
10
Tickets/Person/Hour

6 Events/Month
5
Tickets/Person/Hour

Skimming is a fraudulent practice where incoming revenue is intercepted and stolen before being recorded in the company's books; for example, an employee might accept payment from a customer, deliberately not record the transaction into the register, and pocket the money. The Association of Certified Fraud Examiners (ACFE) estimates that organizations lose approximately 5% of their annual revenues to fraud. They also found that skimming schemes, on average, can last 18 months before being detected. ¹ For the Ocean Center, this equates to approximately \$180,000 based on FY 2024 revenues. To achieve this fraud scheme, it only takes 5-10 tickets to be skimmed per person per hour, depending on the number of

events being held. Appendix 3 details these calculations.

¹ Association of Certified Fraud Examiners: Occupational Fraud: A Report to the Nations, 2024 acfe.com

Parking booths are not utilized in the west and south parking lots. LAZ does not utilize a cash register or any cash transaction recording systems in the parking lots when collecting cash during Peabody events. The attendant collects the cash, and a pre-numbered ticket is provided to the customer with any change. The parking attendant then places the cash into a plastic snack bin. The bin lacks a cover to shield its contents from weather elements and remains exposed and viewable to both parking customers and pedestrians, as shown in Figure 2. Additionally, the attendants do not wear aprons, which restrict access to the employee's pockets, helping to reduce skimming schemes.

Figure 2: Tickets and Cash Stored in Plastic Snack Bins for Parking Lots



Before Peabody events occur, parking attendants are provided with a set number of parking tickets. Throughout the day and at the end of the event, LAZ managers are to compare the number of tickets sold to the amount of cash collected. However, auditors observed a handful of patrons declined to accept parking tickets. These "extra" tickets provide attendants with an opportunity to pocket cash.

Auditors did not observe the LAZ manager checking in on the parking attendant nor reconciling the cash in the basket to the number of sold and unsold tickets. This was contrary to how the local LAZ manager explained how the procedures should be.

Auditors observed multiple opportunities for attendants to accept cash instead of collecting electronic payments via the Clover machines that LAZ utilizes. Parking attendants stand at the patron's vehicle window and can obstruct the view of security cameras or other workers while accepting payments. Additionally, the Clover machines can reprint receipts. While this function is necessary, it can also be used to deceive the customer

Attendants' positioning creates blind spots that enable undetected cash acceptance and receipt manipulation.

into thinking they received a legitimate parking receipt. Although a careful customer might notice if they're given someone else's reprinted receipt, most people do not scrutinize parking receipts due to the small dollar amount involved and their focus on quickly reaching their event.

A LAZ parking attendant relayed to the auditors that when a customer does not have a credit card or the Clover machine struggles to accept their credit card, the attendant will personally accept cash and then swipe their personal credit card for the same amount at a later time. The

auditors did not observe this activity. However, this practice undermines internal controls by establishing an informal cash-handling process that lacks proper documentation, oversight, and segregation of duties, potentially leading to unrecorded transactions and financial discrepancies.

Attendants accept cash from customers and claim they'll charge their personal cards later.

LAZ parking attendants shared with the auditors that they could accept cash tips from patrons until the October 2024 Daytona Beach Biketoberfest event. After Biketoberfest, the local LAZ manager informed their employees that LAZ corporate management had discontinued the practice of accepting cash tips, but permitted them to accept goods and food as substitutes. This practice directly contradicts LAZ's written policy, which expressly prohibits employees from receiving any gifts, gratuities, or kickbacks.

To collect revenue, LAZ staff utilize handheld Clover² machines at the parking lots. The devices process debit and credit card transactions. The Clover machines are signed in with generic usernames such as "Revenue Audit" or "Alan Lazowski" (the founder and CEO of LAZ). See Figure 3. The attendants share the devices to collect revenue, and all attendants are aware of the password.

Figure 3: Clover Machines Use Generic Login and Cashier Names



² Clover provides smart payment and commerce solutions, designed for small and medium-sized businesses. The Clover system can offer a range of point-of-sale (POS) systems and card machines.

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Currently, it cannot be determined which staff member processed payments on specific devices since attendants share and interchange Clover machines during their shifts. Clover's website indicates these devices can be configured with individual employee passcodes and logins, enabling reports that clearly identify which staff member handled each transaction.

Shared payment devices eliminate individual accountability and prevent transaction-level tracking.

Clover devices do not hold a battery charge for the entire shift. During our March 28 observation, the Clover devices failed to maintain battery power throughout the shift, despite starting with a 100% charge. The machines' batteries were depleted after only 2 hours. The attendant informed the onsite manager, via the radio, who provided replacement machines. However, 3 hours later, one replacement was completely out of charge while the other had only 4% battery remaining. When the auditors departed 45 minutes later, no additional devices had been supplied, despite the parking lot still accepting customers for another 2 hours. It is unclear if the attendant could collect revenue after the auditors left, as no replacement devices were brought.

Ocean Center management stated that disabled veterans are not provided free or discounted parking. However, when working with the attendants, they said that disabled veterans could park for free. Auditors observed that parking attendants allowed vehicles with disabled veteran license plates to park for free. The attendant did not issue exception tickets or record the number of discounted parking tickets for these transactions. Instead, the vehicle is allowed to enter the lot and park. By not tracking the number of discounted and exception tickets, the attendant has another opportunity to skim ticket sales.

The lack of discounted or exception ticket processes creates opportunities for skimming while preventing management from analyzing exceptions and detecting operational abnormalities.

Since veteran plates are rear-mounted, attendants often do not identify them until the vehicle drives away to park. In such cases, and if there is no line at the entrance, the LAZ employee abandons their post to find and refund the customer. The lack of clear policies, signage, or instructions has created confusion between the Ocean Center and LAZ staff regarding protocols for parking for disabled veterans. Without proper exception ticket documentation, management cannot analyze discounting patterns or detect abnormalities.

Auditors observed that LAZ employees use prime customer parking spaces. These employees store essential equipment in their personal vehicles, such as extra tickets and extra receipt paper due to the lack of equipment and booths. As shown in Figure 4, they occupy valuable front-row, revenue-generating spots rather than using the dock lot or garage roof areas to park their vehicles.

Figure 4: LAZ Employee Parks in Customer Parking During Shifts and Utilizes Their Personal Car Trunk



Auditors observed several outdated signs in the West and South parking lots. The signs guide patrons to pay by plate, even though this practice was discontinued more than six months ago. The signs, self-pay kiosks, and booths continuously confused patrons. Figure 5 shows the outdated signs and kiosks.

Figure 5: Outdated Signage and Self-Pay Kiosks Confuse Customers and Add to Their Frustrations



Lack of Attention to Staff's Safety Opens the Door to Rationalizing Skimming

When auditors were onsite on March 28th from 12 to 6 p.m., the LAZ attendant did not receive any relief for a meal break. The attendant worked onsite before the auditors arrived at noon and was scheduled to work until 9 p.m. Another LAZ attendant assisted in the lot whose shift ended at 4 p.m. The onsite manager did not physically check on the West Lot, nor radio the attendant the entire time the auditors were onsite to ensure everything was working as intended. When the auditors left at 6 p.m., the attendant radioed the manager to inform them that the auditors were leaving and that she had not taken any rest breaks.

On April 10th, the Ocean Center hosted a week-long national cheerleading event throughout the day. At 8 p.m., the Peabody Auditorium hosted a sold-out concert. When auditors arrived onsite at 3 p.m., two attendants were working at the West Lot, which was already at capacity. Due to the large number of cheerleading event participants, the parking lot was extremely busy and chaotic. The attendants struggled to accept customer payments, determine parking spot availability, manage street flow and incoming traffic, and provide proper customer service. As mentioned previously, the two events accepted different forms of payment and different rates.

In an attempt to relieve the traffic congestion, the City of Daytona Beach parked two public work trucks on the street between the two parking lots and placed a City worker to guide the traffic. It appeared that there was a lack of communication and collaboration among the Ocean Center, Peabody, and the City before the events. The trucks and congestion are visible in Figures 6 and 7.

Figure 6: Event Attendees Cross in Front of the West Lot Entrance, Further Adding to Parking Stress



Figure 7: City of Daytona Beach Public Works and Police Directing Traffic Between South and West Lots



It was also observed that a "Valet Parking - \$20 ahead" sign was placed behind the trucks as seen in Figure 7. The LAZ attendants were unsure who placed the sign nor who provided valet parking services. Later, when discussed with the Ocean Center Director, she was unaware of the valet parking option and who was behind it. The County Council did not approve the valet parking rate.

A LAZ employee was so overwhelmed by the stress that they abruptly left their post for 30 minutes to calm down and collect their bearings. Around 7 p.m., the two Daytona Beach Police Officers arrived to direct traffic. At that time, the traffic at the parking lots (Auditorium Blvd.) was at a complete standstill. The police officers informed the auditors that traffic had spilled over to N. Halifax Ave., down to Hollywood Ave., to Main Street, and S. Atlantic Ave. Figure 8 illustrates in red lines the streets impacted, according to the police officers.

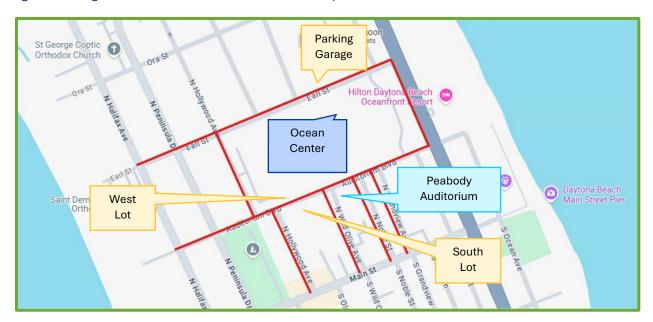


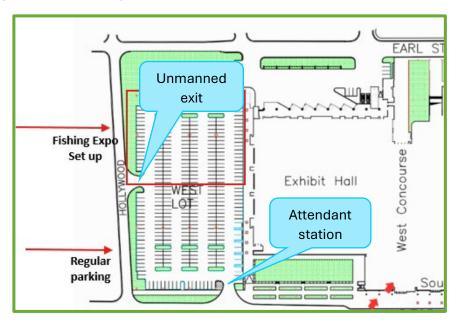
Figure 8: Congested Roads Around Ocean Center on April 10th

The situation quickly deteriorated beyond control. Several drivers abandoned their vehicles to express their irritation with the lack of parking. Several customers also yelled obscenities from their open windows. Between the traffic congestion and angry customers, one LAZ attendant became so overwhelmed that they abandoned their post and walked to their vehicle to cool off, cry, and gather their bearings. The attendant returned about 30 minutes later.

Auditors observed a lack of understanding of how many parking spaces remained to be filled once the parking attendants started accepting vehicles. Parking attendants, operating independently, are positioned at the entrance of the parking lot to accept payments. If the parking lot is full, the attendant places a sign at the entrance to notify customers. If a previously parked patron leaves, the attendant can accept more vehicles to park; however, the attendant cannot know how many parking spaces are available at any given time. This is primarily due to the attendants' positioning with their backs to the exits while assisting customers trying to enter the lot.

With attendants' backs to the exit and a lack of communication, it is unclear how many parking spaces remain available. When auditors were onsite on March 28, the West Lot was divided into two segments: the fishing event and the color guard event, as illustrated in Figure 9. While metal fencing separated these areas, the fishing expo had an unmanned exit onto Hollywood Avenue. This security gap allowed vehicles to leave the parking lot without detection by employees stationed at the entrance.

Figure 9: West Lot Segmentation on March 28, 2025



A LAZ employee said they monitor the parking lot surveillance cameras for open parking spaces. However, they acknowledged that surveillance does not provide a comprehensive view of the entire parking lot, and in-person verification is periodically necessary.

On April 10th, auditors observed a LAZ employee using a golf cart to track available parking spaces and communicate updates via radio to the parking attendants. However, this employee ended their shift at 6 p.m. without a replacement. This eliminated the coordination system during the critical two hours leading up to the sold-out Peabody event.

Critical parking coordination between staff ended two hours before a sold-out event at the Peabody.

When the parking lots are utilized for events, LAZ employees are exposed to safety risks. There is no shelter to protect from traffic, heat, or inclement weather. Previously, the attendants had a pop-up canopy tent, but it was damaged by a hurricane more than three years ago and has not been replaced. It was observed every shift, that the parking attendants do not wear high-visibility reflective vests while directing traffic in and out of the lots.

On the 28th, attendants were set up on the side of the turning lanes, blocking the traffic path. On the 30th, the attendants were positioned in the middle of the entrance and exit lanes on the double yellow line. Vehicles use both lanes to turn around, and occasionally, the drivers run over or hit the parking signs, the attendants' chairs, and the lot gates. The auditors witnessed a bus hitting the yellow entrance gates and another bus almost hitting the attendants, as shown in Figure 10.

On the 10th, during the chaos previously mentioned, auditors witnessed several instances where vehicles came dangerously close to hitting attendants. The employees had to scream to pedestrians, the customers, and each other, "Watch out!" or "Watch your back!" While parking attendants are helping incoming traffic, their backs are exposed to the exiting traffic. Auditors observed another vehicle running over the entrance signs as illustrated in Figure 11.

Figure 10: Attendants Situated in Dangerous Setup and Almost Hit by a Bus



Figure 11: Attendants Have Their Back to Exiting Vehicles and Layout Obstructs Views



In addition to the traffic danger, there is no shelter from inclement weather. According to the National Weather Service, ³ Central Florida is considered the "Lightning Capital of the U.S." as lightning is responsible for more weather-related deaths than all other weather events combined. The threat to employee safety is significant. The parking attendants stated they were advised by LAZ management to look for lightning and go into their personal vehicles or inside the building. No other safeguards for lightning or inclement weather are provided. Neither LAZ nor the Ocean Center has a written policy or procedures for inclement weather during parking events.

The contract between the Ocean Center and LAZ states that LAZ will take the necessary precautions and comply with regulations set by the Occupational Safety and Health Administration (OSHA).

As described in the preceding pages, several opportunities for employees to commit fraud exist under the current practices. Employers can effectively utilize the fraud triangle, shown in Figure 12, to understand and mitigate fraud risk, which is inherently high already in parking operations. Fraud is *deliberately* committed by employees who intentionally exploit weaknesses in controls, either because they are under duress or for personal gain. Typically, they attempt to justify their actions to themselves or others as somehow legitimate or deserved. If all three elements are present, a person is highly likely to pursue fraudulent activity.

To reduce opportunities, employers can increase controls, such as those recommended. To reduce pressure and rationalization, they can reduce workplace stress, mitigate safety risks, foster open communication, and enhance employee recognition and appreciation.

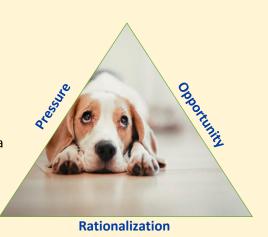
Figure 12: The Fraud Triangle Helps Bring Awareness of Why Employees Commit Fraud

Fraud Triangle

Pressure – financial need, personal debts, vices, family living, medical bills, pressure from superiors, living beyond means

Opportunity – internal control weaknesses, ability to override existing internal controls, poor tone at the top

Rationalization – justify the fraud in a manner that as a result, indicates how they are deserving of what was unfairly taken, "I've been here for 8 hours without a break and my manager doesn't care about me", "I've dedicated my life to this cause and haven't gotten the recognition I deserve", "I'll pay it back-it's just a small amount..."



³ National Weather Service, Melbourne, FL. "Lightning Information Center". May 21, 2025. https://www.weather.gov/mlb/lightning_info This is primarily due to Florida's unique peninsula shape being surrounded by water that is relatively cooler than the afternoon temperatures over land. These temperature differences create a pressure that drives winds which collide with sea breezes, producing larger, longer lasting and stronger thunderstorms.

RECOMMENDATIONS:

- A. Install proper equipment, such as license plate readers and loop counters, at all parking facilities to ensure all revenue is collected, tracked, and maintained with accurate vehicle counts.
- B. Discontinue cash as a form of payment due to the risk of fraud and lack of controls installed by LAZ.
- C. Discontinue separate pricing for Peabody events and establish a single parking cost for all attendees.
- D. Assign unique login credentials for each staff person utilizing a Clover device.
- E. Ensure that exception and discounted tickets are issued, tracked, recorded, and included in the daily and monthly reports submitted.
- F. If cash payments are continued, parking attendants should wear aprons with no access to the cash box.
- G. Purchase additional handheld devices, ensuring replacements are brought to the attendants fully charged.
- H. Ensure LAZ management has appropriate shift schedules in place so that parking attendants have breaks and/or work in pairs. Additionally, ensure LAZ management provides appropriate support during high-volume sold-out events.
- I. Conduct an in-depth parking utilization analysis to compare the maximum number of attendees to the available parking spaces.
- J. Develop coordinated capacity management procedures with the Peabody during concurrent events, including overflow parking and shuttle services, ensuring adequate staffing and control procedures are maintained even during peak demand.
- K. Provide appropriate shelter and/or workstation for the parking attendants. Implement safety measures, such as providing safety vests for workers.
- L. Coordinate with LAZ management to establish an emergency action plan and related procedures for inclement weather situations.

2. POOR CONTRACT ADMINISTRATION IMPAIRS ACCOUNTABILITY AND CREATES OVERSIGHT GAPS

LAZ's own internal audits reveal persistent operational deficiencies that are akin to the control weaknesses identified in this report. Between 2021 and 2024, LAZ auditors documented an average annual revenue loss of \$48,000 and recurring safety and security concerns. Additionally, LAZ has failed to provide required financial statements, while Ocean Center staff lacks procedures for proper contract oversight.

LAZ Operational Audits Reveal Similar Deficiencies But Were Ignored by Staff

LAZ agreed to conduct frequent onsite operational audits, typically performed annually. These unannounced operational audits examine reporting, procedures, customer satisfaction, and facility conditions.

During the summer of 2021, the then-onsite LAZ manager was not following procedures for making regular bank deposits. The LAZ regional Vice President agreed that LAZ auditors would conduct these audits quarterly for at least two years until improvements were made. Since that time, a changeover in management at both LAZ and the Ocean Center has occurred, and this arrangement was not followed. Additionally, the Ocean Center staff did not review these reports until prompted by this auditor.

LAZ auditors projected an average annual revenue loss of \$48,000 due to their lack of ticket controls.

They also found safety and security issues persist year after year.

The audit results demonstrate mixed performance over the three-year period. The audit scores fluctuated from 79% in December 2021 to a high of 94% in April 2023, before declining to 83% in October 2024, well below LAZ's 90% target. Persistent issues have remained across multiple audits, including annual revenue loss projections as high as \$73,000, ongoing safety violations, and

inadequate security coverage. Notably, generic login credentials identified in 2021 remain unresolved in the October 2024 audit, indicating control

weaknesses persist despite repeated identification. Appendix 2 includes a summary of these issues, and Appendix 3 details the theft calculations.

LAZ internal auditors identified issues that represent a breakdown in operational governance. Safety violations create liability exposure that could result in serious injuries, while revenue control failures indicate fundamental weaknesses in internal controls. These findings align with the observations independently identified in this audit, demonstrating that operational and financial risks are pervasive if left unaddressed.



Missing Contract Deliverables Prevent Proper Ocean Center Oversight

LAZ has not submitted annual audited financial statements as required in the contract. The financial audit report is to include two separate schedules specific to the Ocean Center. The Annual Gross Activity Report is a monthly total of gross receipts generated by LAZ, and the Net Receipt Payments Report is a monthly report of revenues turned over to the County. Both reports are to be signed and certified by a third-party, independent certified public accountant who attests to the accuracy of the reports.

Had these audited schedules been received, Ocean Center staff could have compared them to the monthly reports that LAZ submitted. Currently, staff are unable to verify financial transactions independently and are reliant on monthly reports prepared by LAZ.

Independently audited financial schedules help ensure that reported monthly revenues are accurate and complete.

LAZ agreed to conduct bi-annual customer surveys to measure the number and severity of customer complaints and compliments. These surveys have not been conducted since the contract was signed in 2018. Additionally, LAZ promised to conduct a "mystery shopper program" utilizing a third-party company to visit the campus periodically. The shoppers pose as a daily parking visitor. In their report, they rate their visit based on friendliness, cleanliness, and customer service. This program has not been conducted as promised. The absence of these monitoring programs means customer service issues may go undetected for extended periods, potentially damaging the Ocean Center's reputation and visitor experience.



LAZ was to provide real-time online access for Ocean Center staff to review parking transaction reports. Until this audit began, current staff had neither requested nor had

Staff lacks access to independent bank and credit card statements to verify reported monthly revenues.

access to this site. Previously, Ocean Center staff relied on LAZ personnel to provide accurate monthly reporting. Since this audit started, the staff has been provided with access. These reports provide comprehensive transaction data, including unique transaction numbers, cashier IDs, payment details, and details of any exception transactions.

LAZ has also not provided monthly, independent statements from their bank or electronic card processor. These third-party statements are essential for proper financial oversight because they provide an independent verification source that the concessionaire cannot alter or manipulate. Without access to these bank and credit card statements, Ocean Center staff cannot cross-reference reported revenue against actual deposits, identify discrepancies between claimed and actual processed amounts, detect potential underreporting of sales, or ensure all transactions are properly captured and reported.

The Ocean Center provides monthly parking to employees of businesses across the street at the Ocean Walk Shoppes. LAZ has contracted separately with these businesses to charge the County-approved monthly parking rates and collection procedures. Monthly, LAZ submits an accounts receivable aging report that lists the customers, the amount due, and any past due accounts. However, Ocean Center staff were not provided copies of these agreements and were not involved in negotiating them. Additionally, staff have not been monitoring, analyzing, or reconciling the reports. During the audit, staff actively worked with the LAZ onsite manager to establish monitoring and reconciling these accounts.

The Ocean Center does not have a policy and procedures handbook, including guidelines for managing overall parking operations and oversight of LAZ management. During the audit, staff started developing a handbook to be completed later this summer. A handbook should include the following guidelines for Ocean Center staff:

A handbook will provide staff with essential guidance for parking operations oversight.

- Concessionaire's daily responsibilities, including staffing levels, proper money handling procedures, facility cleanliness, nightly vehicle inventory, customer receivable balances, and inclement weather.
- Revenue verification procedures, including daily, monthly, and annual reporting necessary to ensure all revenues are collected. Additionally, comparing monthly revenues to independent statements from LAZ's electronic payment processor and bank.
- Concessionaire performance management, including key performance indicators such as revenue per parking space, operating cost ratios, customer service scores, and other metrics.
- Procedures for handling validations, exceptions, disabled vehicles, and other unique circumstances.
- Employee and contracted employee parking availability and usage during events.

RECOMMENDATIONS:

- A. Ensure to receive, review, analyze, and follow up on LAZ internal audit reports and compare them to prior reports to track progress on any deficiencies noted. If ongoing issues persist, contact LAZ management for resolution and document contractor performance issues with the Purchasing Director.
- B. Ensure LAZ management submits annual audited financial statements and compare to the records maintained by the Ocean Center. Work with LAZ management if discrepancies exist.
- C. Ensure LAZ management conducts bi-annual surveys and mystery shopper programs. Analyze and track the results and work with LAZ management on any improvements noted.
- D. Monitor, analyze, and reconcile accounts receivable as part of the monthly reconciliation.
- E. Establish policy and procedures on reporting functionality and reconciliation to supporting statements and documents, ensuring all revenues are properly reported.

Appendix 1: Ocean Center Parking Financial Activity FY 2020-FY 2024

	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
Assets & Deferred Outflows of Resources					
Current assets	\$ 638,199	\$ 450,382	\$ 958,856	\$ 1,312,034	\$ 2,265,372
Noncurrent assets	6,402,461	6,504,061	7,989,434	7,811,607	7,512,268
Deferred outflows	25,594	23,007	32,282	21,370	30,672
Total Assets and Deferred Outflows	7,066,254	6,977,450	8,980,572	9,145,011	9,808,312
Liabilities and Deferred Inflows of Resources					
Current liabilities	938,341	1,020,022	1,105,547	990,462	72,569
Noncurrent liabilities	2,926,352	2,200,214	2,934,086	2,005,797	2,005,611
Deferred inflows	42,220	59,022	42,962	38,156	31,115
Total Liabilities and Deferred Inflows	3,906,913	3,279,258	4,082,595	3,034,415	2,109,295
Net Position					
Net investment in capital assets	2,705,535	3,696,437	6,014,084	6,885,439	7,512,268
Unrestricted	453,806	1,755	(1,116,107)	(774,843)	186,749
Total Net Position	\$ 3,159,341	\$ 3,698,192	\$ 4,897,977	\$ 6,110,596	\$ 7,699,017
Revenues					
Total Operating Revenue	1,556,201	2,301,895	2,790,109	2,908,350	3,597,519
Expenses	(4 500 745)	(4.440.040)	(4.540.407)	(4.004.000)	(0.000.754)
Total Operating Expenses	(1,533,715)	(1,419,246)	(1,518,127)	(1,694,962)	(2,082,751)
Nonoperating Activity					
Nonoperating revenue	11,384	(1,103)	(5,952)	38,956	90,967
Nonoperating expenses	(117,946)	(92,695)	(66,245)	(38,752)	(11,117)
Net gain (loss) on disposal of capital assets	17	-	-	-	-
Transfers, net	253,880	(250,000)		(973)	(6,197)
Change in Net Position	\$ 169,821	\$ 538,851	\$ 1,199,785	\$ 1,212,619	\$ 1,588,421
Net Position, Beginning	2,989,520	3,159,341	3,698,192	4,897,977	6,110,596
Net Position, Ending	\$ 3,159,341	\$ 3,698,192	\$ 4,897,977	\$ 6,110,596	\$ 7,699,017

The amounts shown are derived from the County's Annual Comprehensive Financial Report (ACFR) available on the County's website.⁴ The County's fiscal year ends September 30. The Ocean Center Parking Fund is an enterprise fund that accounts for the fiscal activities of the County-owned parking facilities located adjacent to the Ocean Center.

⁴ https://www.volusia.org/services/financial-and-administrative-services/financial-reports-schedules.stml

Appendix 2: Summary of LAZ Internal Auditor Reports

LAZ internal auditors have conducted operational audits at the Ocean Center since 2021. A summary of their findings is below.

	AZ Audit Score	Identified LAZ Audit Summary
12/16/2021	79.27%	 Generic login credentials to their revenue system. Need accountability for event transactions, like: weekend/event traffic entering the garage due to no gate loop count reports to reconcile tickets sold. Safety issues such as pooling water, emergency exit doors not functioning, poor emergency exit signage, and signs not lit. Security camera coverage is insufficient.
12/10/2021	70.2770	 Approximate potential annual revenue loss of \$21,000
12/14/2022	93.21%	due to the uncollected ticket count being unreasonable. • Safety issues surrounding the emergency exit doors and signs malfunctioning.
4/24/2023	94.71%	 Approximate potential annual revenue loss of \$73,000 due to the uncollected ticket count being unreasonable. Camera coverage improvement, but some areas are without sufficient coverage.
7/31/2023	94.30%	 Approximate potential annual revenue loss of \$53,000 due to the uncollected ticket count being unreasonable. Security camera coverage was improved, but some areas are without sufficient coverage. Numerous lights were malfunctioning in the garage.
10/30/2024	83.16%	 Approximate potential annual revenue loss of \$45,000 due to the uncollected ticket count being unreasonable. Daily revenue overstated by \$823. \$1,560 of several parking accounts were refunded without proper documentation. Refund features are not restricted due to generic logins being shared. Several monthly customer accounts were open with unapplied credits. LAZ staff are not checking payment kiosks 3 times a week for card skimmers.⁵ Continual issues with pedestrian safety and security within the garage, lights were malfunctioning. Elevator certificate was expired and not current.

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⁵ Card skimmers are small, illegal devices criminals secretly attach to legitimate card readers to steal customers' credit and debit card information for fraudulent uses.

Appendix 3: Fraud Impact Analysis

Single Person Fraud Multi-Person Fraud 1 Person, 1 Parking Lot 2 People, 2 Parking Lots \$50k \$180k It only takes... It only takes... 3 Events/Month 6 Events/Month 3 Events/Month 12 6 10 5 Tickets/Person/Hour

LAZ auditors projected average annual revenue loss (\$48,000) requires only 6-12 tickets per hour when 1 person is working in 1 parking lot.

The ACFE 5% estimate of annual revenue loss (\$180,000) requires only 5-10 tickets per person per hour when coordinated across multiple parking lots.

This demonstrate the control challenge: significant revenue fraud can occur undetected through surprisingly small individual actions.





Single Person Risk: 6-12 tickets/hour

One parking attendant could easily skim \$50k annually with minimal effort that would not raise immediate suspicion.



Coordinated Risk: 5-10 tickets/person/hour

Multiple attendants can skim revenues with minimal effort that appear reasonable when viewed in isolation.



Event Frequency Amplifies Risk

More frequent events require fewer stolen tickets per event, making fraud easier to hide and sustain.



O Detection Must Focus on Patterns

Traditional high-threshold alerts will miss these sustainable fraud schemes that operate below the typical red-flag levels.

Methodology: Calculations based on \$15 parking fee, 8-hour shifts, varying monthly event frequencies. Of note, 118 events were held in 2024 which averages to 10 events per month.

Single-Person Scenario: 1 attendant at 1 parking lot Multi-Person Scenario: 2 attendants at 2 parking lots

ACFE Reference: Association of Certified Fraud Examiners 2024 Report to the Nations estimate organizations lose approximately 5% of revenues to fraud schemes.

Appendix 4: Management Responses

Management's responses, including the staff assigned to implement each audit recommendation and the target implementation date, are provided below.

RECOMMENDATION 1A: Install proper equipment, such as license plate readers and loop counters, at all parking facilities to ensure all revenue is collected, tracked, and maintained with accurate vehicle counts.

MANAGEMENT'S RESPONSES: We agree, and staff are actively working with LAZ on the installation of License Plate Recognition (LPR) systems in the two flat lots, with estimated funding of \$300,000 identified in the FY 2025–26 budget.

In addition, LAZ has identified a loop counter integrated with the existing FLASH system. We are currently reviewing reports to reconcile entries, tickets issued, and tickets vended.

STAFF ASSIGNED TO IMPLEMENT: Assistant Ocean Center Director

TARGET IMPLEMENTATION DATE: In progress with an anticipated completion date of November 2025.

RECOMMENDATION 1B: Discontinue cash as a form of payment due to the risk of fraud and lack of controls installed by LAZ.

MANAGEMENT'S RESPONSES: We agree. The Ocean Center transitioned to a cashless system for all events effective October 1, 2024, with the exception of Peabody events and high school graduations. Peabody has agreed to adopt a cashless model beginning August 1, 2025.

A meeting is scheduled with Volusia County School administration on Aug. 7 to discuss the 2026 graduation ceremonies. At that time, the client will be advised that all Ocean Center operations, including parking, will operate on a fully cashless basis.

STAFF ASSIGNED TO IMPLEMENT: Assistant Ocean Center Director

TARGET IMPLEMENTATION DATE: Complete- Ocean Center and Peabody events are cashless effective August 1, 2025. In progress- Volusia County School Graduations with an anticipated completion date of September 1, 2025.

RECOMMENDATION 1C: Discontinue separate pricing for Peabody events and establish a single parking cost for all attendees.

MANAGEMENT'S RESPONSES: We agree. The Peabody has agreed to a price increase to \$15, effective January 1, 2026, aligning with the Ocean Center's rate. Staff will present the proposed change to the County Council for approval in the 2026 budget.

STAFF ASSIGNED TO IMPLEMENT: Ocean Center Director

TARGET IMPLEMENTATION DATE: Complete.

RECOMMENDATION 1D: Assign unique login credentials for each staff person utilizing a Clover device.

MANAGEMENT'S RESPONSES: We agree, and each employee has been assigned a unique login credential.

STAFF ASSIGNED TO IMPLEMENT: Finance and Administration Director

TARGET IMPLEMENTATION DATE: Complete.

RECOMMENDATION 1E: Ensure that exception and discounted tickets are issued, tracked, recorded, and included in the daily and monthly reports submitted.

MANAGEMENT'S RESPONSES: We agree, and Ocean Center staff are receiving the validation report from LAZ; however, no action can be taken until all other financial reporting meets the requested standards. Staff are following up weekly with LAZ, and if the requested information is not received by August 1, a Letter to Cure will be issued by Purchasing.

STAFF ASSIGNED TO IMPLEMENT: Finance and Administration Director

TARGET IMPLEMENTATION DATE: In progress with an anticipated completion date- Letter to Cure August 1, 2025, with completion September 1, 2025.

RECOMMENDATION 1F: If cash payments are continued, parking attendants should wear aprons with no access to the cash box.

MANAGEMENT'S RESPONSES: We agree, and effective August 1, 2025, all flat lots and the parking garage will operate on a cashless basis for all events. In the meantime, LAZ has developed cash management procedures to include aprons and for use in the event of mechanical failures, when we resort to cash.

STAFF ASSIGNED TO IMPLEMENT: Assistant Ocean Center Director

TARGET IMPLEMENTATION DATE: Complete.

RECOMMENDATION 1G: Purchase additional handheld devices, ensuring replacements are brought to the attendants fully charged.

MANAGEMENT'S RESPONSES: We agree, and LAZ has purchased 2 handhelds, bringing the total to 8 in inventory.

STAFF ASSIGNED TO IMPLEMENT: Assistant Ocean Center Director

TARGET IMPLEMENTATION DATE: Complete.

RECOMMENDATION 1H: Ensure LAZ management has appropriate shift schedules in place so that parking attendants have breaks and/or work in pairs. Additionally, ensure LAZ management provides appropriate support during high-volume sold-out events.

MANAGEMENT'S RESPONSES: We agree. LAZ, in coordination with Ocean Center staff, is in the process of developing parking plans tailored to each event type and expected attendance. These plans will define the number of attendants required to fully support operations, including appropriate coverage for staff breaks. In the interim, LAZ has implemented staffing levels necessary to support current event operations.

STAFF ASSIGNED TO IMPLEMENT: Assistant Ocean Center Director

TARGET IMPLEMENTATION DATE: In progress with anticipated completion- September 1, 2025.

RECOMMENDATION 11: Conduct an in-depth parking utilization analysis to compare the maximum number of attendees to the available parking spaces.

MANAGEMENT'S RESPONSES: We agree. The Ocean Center and Peabody Auditorium have a combined sold-out capacity of approximately 10,000 attendees. Based on an average of 2.5 attendees per vehicle, a simultaneous sold-out event at both venues requires approximately 4,000 parking spaces. For a sold-out Ocean Center event alone, the estimated need is 3,200 spaces.

Currently, we have access to approximately 2,000 parking spaces, resulting in a shortfall during peak events. To address this gap, we have identified off-site parking opportunities and are actively working to secure agreements for their use. We are also in the process of contracting a shuttle service to transport attendees from these overflow locations. In coordination with the Daytona Beach Police Department, shuttle routes are being developed to ensure timely and efficient transportation to and from the venue.

The City of Daytona Beach management team has been a strong, solutions-oriented partner in this effort, working closely with us to ensure a smooth parking experience for attendees. Additionally, a consulting firm is currently conducting a feasibility study to explore the potential expansion of the facility, and parking is included in the scope of that review. However, we are confident in the current analysis and the strategies outlined above to meet demand without expansion.

STAFF ASSIGNED TO IMPLEMENT: Ocean Center Director and Assistant Ocean Center Director

TARGET IMPLEMENTATION DATE: In progress with an anticipated completion- October 1, 2025.

RECOMMENDATION 1J: Develop coordinated capacity management procedures with the Peabody during concurrent events, including overflow parking and shuttle services, ensuring adequate staffing and control procedures are maintained even during peak demand.

MANAGEMENT'S RESPONSES: We agree. Parking plans have been developed to account for both standalone Ocean Center events and concurrent events at the Peabody Auditorium, as noted

in "I" above. We will continue to coordinate closely with Peabody staff during the planning process to ensure alignment and operational efficiency.

To support this coordination, we have established a monthly planning meeting with representatives from the Peabody, Ocean Center, and Daytona Beach Police Department. These meetings will focus on parking strategies, staffing levels, shuttle logistics, and traffic control to ensure a seamless experience for attendees, even during periods of peak demand.

STAFF ASSIGNED TO IMPLEMENT: Assistant Ocean Center Director

TARGET IMPLEMENTATION DATE: In progress with anticipated completion- September 15, 2025.

RECOMMENDATION 1K: Provide appropriate shelter and/or workstation for the parking attendants. Implement safety measures, such as providing safety vests for workers.

MANAGEMENT'S RESPONSES: We agree. The need for on-site personnel at the flat lots will be significantly reduced once the License Plate Recognition (LPR) system is installed. In the interim, LAZ has implemented a solution that includes the use of staff tents positioned inside the lots, away from street traffic. All personnel are equipped with high-visibility vests to ensure safety and visibility during operations.

STAFF ASSIGNED TO IMPLEMENT: Assistant Ocean Center Director

TARGET IMPLEMENTATION DATE: Complete.

RECOMMENDATION 1L: Coordinate with LAZ management to establish an emergency action plan and related procedures for inclement weather situations.

MANAGEMENT'S RESPONSES: We agree. Inclement weather plans have been created and implemented by LAZ to ensure continued parking operations during adverse conditions. The Ocean Center is also working with Volusia County to receive timely weather notifications, which will be communicated directly to LAZ for appropriate operational adjustments.

STAFF ASSIGNED TO IMPLEMENT: Assistant Ocean Center Director

TARGET IMPLEMENTATION DATE: Complete.

RECOMMENDATION 2A: Ensure to receive, review, analyze, and follow up on LAZ internal audit reports and compare them to prior reports to track progress on any deficiencies noted. If ongoing issues persist, contact LAZ management for resolution and document contractor performance issues with the Purchasing Director.

MANAGEMENT'S RESPONSES: We agree. LAZ has not yet provided the internal audit reports as required under the terms of their contract. This requirement was reiterated in the letter to cure issued by the Purchasing Department in May. LAZ understands and agrees that failure to produce the reports will result in the requirement for a full audit of all three contract years in question.

Once the reports are received, we will meet with LAZ management and their auditor to review the findings, assess any deficiencies, and collaboratively develop corrective action plans. The Director of Finance and Administration is working directly with LAZ to obtain all outstanding documentation.

STAFF ASSIGNED TO IMPLEMENT: Ocean Center Director and Finance and Administration Director

TARGET IMPLEMENTATION DATE: In process with anticipated completion- Letter to LAZ- August 1, 2025, with next step management decision September 1, 2025.

RECOMMENDATION 2B: Ensure LAZ management submits annual audited financial statements and compare to the records maintained by the Ocean Center. Work with LAZ management if discrepancies exist.

MANAGEMENT'S RESPONSES: We agree. Once the outstanding audits are received, the Director of Finance will implement a process to notify LAZ staff at least 60 days prior to future audit due dates, allowing sufficient time to prepare and coordinate audit activities. The Director will also monitor compliance with the agreed-upon timeline. If the audit is not completed by the established deadline, Purchasing will be notified to issue an official notice to cure in accordance with contract terms.

STAFF ASSIGNED TO IMPLEMENT: Finance and Administration Director

TARGET IMPLEMENTATION DATE: In-progress- pending receipt of documents requested in 2A.

RECOMMENDATION 2C: Ensure LAZ management conducts bi-annual surveys and mystery shopper programs. Analyze and track the results and work with LAZ management on any improvements noted.

MANAGEMENT'S RESPONSES: We agree. LAZ staff is working on a plan for a bi-annual surveys and mystery shopper evaluations. Bi-annual review meetings will be established to analyze results, identify trends, and create action plans to address any areas in need of improvement. To support consistency and accountability, the team is also developing a comprehensive Standard, Process & Guidelines (SPG) document that will formalize expectations, procedures, and performance benchmarks for parking operations. This approach ensures continuous service enhancements and alignment with operational goals.

STAFF ASSIGNED TO IMPLEMENT: Assistant Ocean Center Director

TARGET IMPLEMENTATION DATE: In process with anticipated completion- September 1, 2025.

- **RECOMMENDATION 2D**: Monitor, analyze, and reconcile accounts receivable as part of the monthly reconciliation.
- MANAGEMENT'S RESPONSES: We agree. Ocean Center staff submitted a formal request to LAZ for an accounts receivable (A/R) report; however, the report has not yet been received. If the requested documentation is not provided by August 1, 2025, a Letter to Cure will be issued by Purchasing.
- **STAFF ASSIGNED TO IMPLEMENT:** Finance and Administration Director
- TARGET IMPLEMENTATION DATE: In process with anticipated completion- Letter to Cure- August 1, 2025, with 30 days to comply- September 1, 2025.
- **RECOMMENDATION 2E:** Establish policy and procedures on reporting functionality and reconciliation to supporting statements and documents, ensuring all revenues are properly reported.
- MANAGEMENT'S RESPONSES: We agree. Ocean Center staff submitted a formal request to LAZ for reports and reconciliation of supporting statements and documents; however, the report has not yet been received. If the requested documentation is not provided by August 1, 2025, a Letter to Cure will be issued by Purchasing.
- **STAFF ASSIGNED TO IMPLEMENT:** Finance and Administration Director
- TARGET IMPLEMENTATION DATE: In process with anticipated completion- Letter to Cure- August 1, 2025, with 30 days to comply- September 1, 2025.

Internal Audit Our Values and Ethics

Values

Public Interest. Internal audit work is performed to benefit the public and improve the way government operates.

Integrity and High Ethical Conduct. Auditors conduct themselves with integrity and honesty, which are the foundations on which trustworthiness is built.

Objectivity. Auditors maintain objectivity in performing services.

Organization and Hard Work. Auditors endeavor to make efficient use of their time. Valued is a safe work place and one in which we are honored and recognized for our talents and accomplishments. Encouraged are fresh ideas and teamwork among employees and between county government and the community we serve.

Professionalism and Manner. Auditors are committed to the highest level of competence and professional conduct. We expect honest and respectful interactions with each other and the public. We handle resources provided, access to information and the position in a professional manner and when appropriate, protect the confidentiality or restricted information our roles may allow us access.

Auditee Relations. Auditors make themselves accessible and communicate openly and frequently. Communications are friendly, non-threatening, fair, and objective.

Audit Reports. Reports focus on significant, timely, and useful information for our constituents. Audit staff strive to make reports accurate, clear, convincing, objective, fair, and constructive.

Professional Development. Auditors strive to improve their knowledge, skills, and abilities through training, work experiences, and related outside activities.

Code of Ethics

Integrity. Establish trust. This provides the basis for reliance on judgment.

Objectivity. Exhibit highest level of professional objectivity in gathering, evaluating, and communicating information about the activity or process being examined. This will make a balanced assessment of all relevant circumstances not unduly influenced by own interests in forming judgments.

Confidentiality. Respect the value and ownership of information received and do not disclose information without appropriate authority unless there is a legal or professional obligation.

Competency. Apply knowledge, skills and experience needed in performance of internal audit services.

Pro ducing Results for My Community. Be informed and knowledgeable. This can produce results my community expects to build trust.

Treating People Fairly. Treat people fairly and develop processes and procedures that are fair.

Diversity and Inclusion. Embrace diversity and inclusiveness to cultivate and promote policies that reflect the community we serve.

Reliability and Consistency. Consistently apply standards and honor the commitment to the community to make it easier to do the right thing even when faced with challenging circumstances.

