



BROWARD OFFICE OF THE INSPECTOR GENERAL

2011–2012 ANNUAL REPORT

ONE NORTH UNIVERSITY DRIVE, SUITE 111 PLANTATION, FLORIDA 33324
PHONE: (954) 357-7873 FAX: (954) 357-7857
HOTLINE: (954) 357-TIPS (8477) EMAIL: INSPECTORGENERAL@BROWARD.ORG
WWW.BROWARDIG.ORG

A MESSAGE FROM THE INSPECTOR GENERAL

It is my privilege to present you the first annual report for the Broward Office of the Inspector General. This report describes the establishment of the OIG as Broward's independent watchdog and our efforts to investigate fraud, corruption, waste, and abuse, and gross mismanagement in government.



During this reporting period the OIG successfully established the key operational components of a new organization: recruiting, hiring, and training a professional staff to execute our mission on behalf of the residents of Broward County. We have examined hundreds of tips, reviewed dozens of signed complaints and undertaken dozens of investigations. Our investigations have uncovered possible criminal misconduct by several individuals. We have identified over \$3.6 million in questionable costs and expenditures within county and municipal governments. We have made recommendations and required status reports from government agencies that have promoted efficacy and accountability. We have worked with county and municipal procurement officials to promote fair, open, and competitive processes that result in a more efficient use of public monies. We have also taken steps to ensure that Broward elected officials comply with the ethics code to ensure transparency in government.

And that was just the beginning. The OIG is committed to rebuilding the public's trust in government by identifying, investigating, and eradicating misconduct and gross mismanagement. Although we are proud of the OIG's progress to date, we appreciate that we must continue to plan, implement, and refine practices and procedures that will enable us to better realize that commitment.

On behalf of our office, I wish to thank Broward officials, employees, and residents for their support, and urge that you not hesitate to contact us with your concerns.

Sincerely,

A handwritten signature in blue ink, appearing to read "John W. Scott". The signature is fluid and cursive.

John W. Scott
Inspector General

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BROWARD OIG MISSION STATEMENT

THE MISSION OF THE BROWARD OFFICE OF THE INSPECTOR GENERAL (OIG) IS TO ACT AS AN INDEPENDENT WATCHDOG FOR THE RESIDENTS OF BROWARD COUNTY. WE PROMOTE INTEGRITY AND ACCOUNTABILITY BY INVESTIGATING ALLEGATIONS OF MISCONDUCT—INCLUDING FRAUD, CORRUPTION, AND ABUSE—AND GROSS MISMANAGEMENT, BY OFFICIALS AND EMPLOYEES OF THE CHARTER GOVERNMENT OF BROWARD COUNTY, ITS THIRTY-ONE MUNICIPALITIES, AND ALL ENTITIES AND PERSONS WHO PROVIDE GOODS AND SERVICES TO THE COUNTY AND THE MUNICIPALITIES. THE OIG PUBLICLY REPORTS ITS FINDINGS TO KEEP RESIDENTS INFORMED. WHENEVER APPROPRIATE, THE OIG SEEKS CRIMINAL PROSECUTION, CIVIL RECOVERIES, ADMINISTRATIVE AND MONETARY SANCTIONS, AND ETHICS SANCTIONS OF THOSE RESPONSIBLE FOR FRAUD, WASTE AND ABUSE IN GOVERNMENT.

ORGANIZATION AND STRUCTURE

In August 2010 the Broward County Commission unanimously voted to place a Charter Amendment question on the November 2010 ballot asking the voters of Broward County if a Charter Office of the Inspector General should be created. The voters responded and Section 12.01 of the Charter of Broward County established the Broward Office of the Inspector General (OIG). The Charter authorizes the OIG to investigate misconduct, including fraud, corruption, abuse, and ethics violations, and gross mismanagement. On April 16, 2011, John W. Scott was selected by the independent Selection-Oversight Committee to be the first ever Broward Inspector General. The Committee entrusted the Inspector General with the responsibility for establishing the foundation for promoting integrity, accountability, and transparency in government on behalf of the residents of Broward County.

Before becoming the Inspector General, Mr. Scott spent most of his career with the United States Department of Justice, where he investigated and prosecuted public corruption and fraud cases across the nation. Those cases included allegations of misconduct by federal, state and local officials including members of Congress, governors, judges, city council members, state legislators, members of the military, and law enforcement officials, as well as vendors, lobbyists and representatives of the banking, securities and finance industries. He received his undergraduate and law degrees from Georgetown University.

In order to accomplish our mission, the OIG has successfully recruited a diverse team of highly qualified individuals who bring to the organization a variety of specialties and skill sets. The OIG team currently consists of the Inspector General, Deputy Inspector General, Assistant Inspector General, General Counsel, six Special Agents, a Contract Oversight Specialist, the Office Manager, and an Investigative Support Specialist. These thirteen professionals include attorneys, former military, federal, state and local law enforcement officers, state regulatory investigators, auditors, procurement specialists, and administrative specialists. Our team holds certifications as fraud examiners, inspector general investigators and criminal justice information system operators.

AUTHORITY AND RESPONSIBILITIES

As the independent watchdog for over 1.7 million residents of Broward County, the OIG's authority extends over all elected and appointed county officials and

employees, all elected and appointed officials and employees of the 31 municipalities located in the county, and all entities and persons who provide goods and services to the county and the municipalities. This responsibility encompasses county and municipal budgets totaling more than \$8 billion, approximately 20,000 employees, and over 450 separate divisions and departments of government. In addition, the OIG has oversight responsibility for 174 elected officials including county commissioners, mayors, vice mayors, city commissioners, and town council members, as well as more than 47,000 registered vendors who provide goods or services to the county and municipalities.

In executing its responsibilities the OIG has the authority to investigate violations of state and federal statutes and codes, county and municipal ordinances and codes, and conduct involving fraud, corruption and abuse. The OIG is also charged with the responsibility to enforce the Code of Ethics for Elected Officials, which was made applicable to all Broward elected officials in January 2012.

MILESTONES

During this reporting period the OIG has achieved a number of milestones in support of its function as an investigative agency. Those milestones include obtaining initial funding; creating a table of organization for the office, developing job descriptions and performance evaluations for positions, and staffing them with dedicated professionals through an intense advertising, recruiting, screening, and hiring process; acquiring, developing and maintaining office space and infrastructure; ordering and inventorying office supplies; acquiring investigative tools and equipment; drafting personnel training materials and investigative protocols; developing and implementing a database management system to track OIG activities; and creating an internet website and other methods for public outreach. Because of our desire to begin functioning as soon as possible, many of those milestones were achieved during or after the OIG completed its first investigations.

In further support of the OIG's mission, we sought to be designated as a "criminal justice agency" under federal and Florida law. As a result, in March 2012, the Federal Bureau of Investigation, via the offices of the Florida Department of Law Enforcement, formally acknowledged that the OIG performs the criminal justice functions which meet the criteria of a criminal justice agency. Both through our own initiative, and through our participation as a member of the Broward County Public Corruption Task Force—a specialized group of federal, state, and local

leadership, ethics, discrimination, web publishing, and training and certification in the use of procurement and payroll systems.

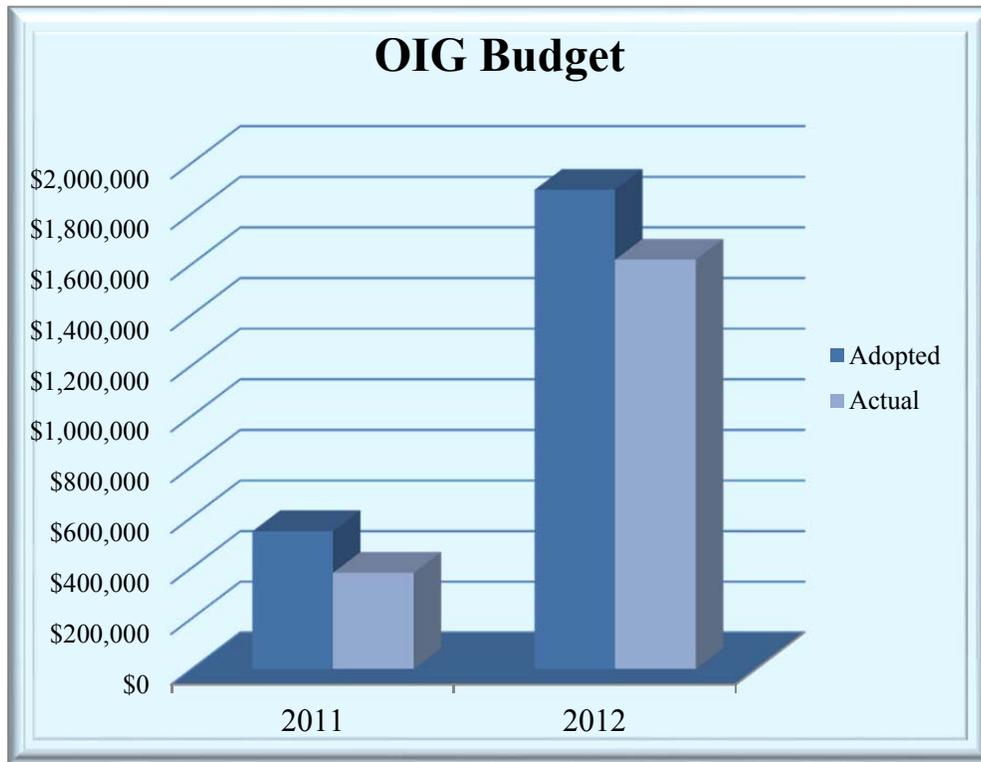
The OIG also provides resources and encourages all staff members to obtain professional certifications and continuing education in order to enhance their professional skills. The OIG and its staff participate as members of the Association of Inspectors General, a national organization of state, local and federal inspectors general and their staffs. The AIG offers training seminars and certification institutes for members. All Special Agents of the OIG have received the designation of Certified Inspector General Investigator after undergoing training and testing by the AIG. During this reporting period, members of the OIG staff also underwent additional training provided by the AIG as well as by the Association of Certified Fraud Examiners, the Government Finance Officers Association, the Criminal Justice Information Systems Annual Symposium, and the Advanced Investigative Techniques and Certified Public Purchasing Officer program.

BUDGET

The OIG's budget is funded through general funds provided by the county and approved by the Broward County Commission. The OIG budget includes operating and capital expenses, as well as funds required to retain hearing officers and outside counsel to represent the Inspector General in connection with complaints brought by the Inspector General pursuant to the Charter. However, the Charter requires that the OIG be an independent organization to assure that no interference or external influence affects the objectivity of the office.

The OIG is committed to operating in a fiscally responsible manner. The OIG's approved budget for the remaining months of fiscal year (FY) 2011 was \$543,870, while actual expenditures were \$379,544, approximately 30% less than the approved budget.

The OIG's approved budget for FY 2012 was \$1,892,500, while the estimated actual expenditures were \$1,616,770¹, approximately 15% less than the approved budget. The OIG's budget represents 0.06% of the County budget.



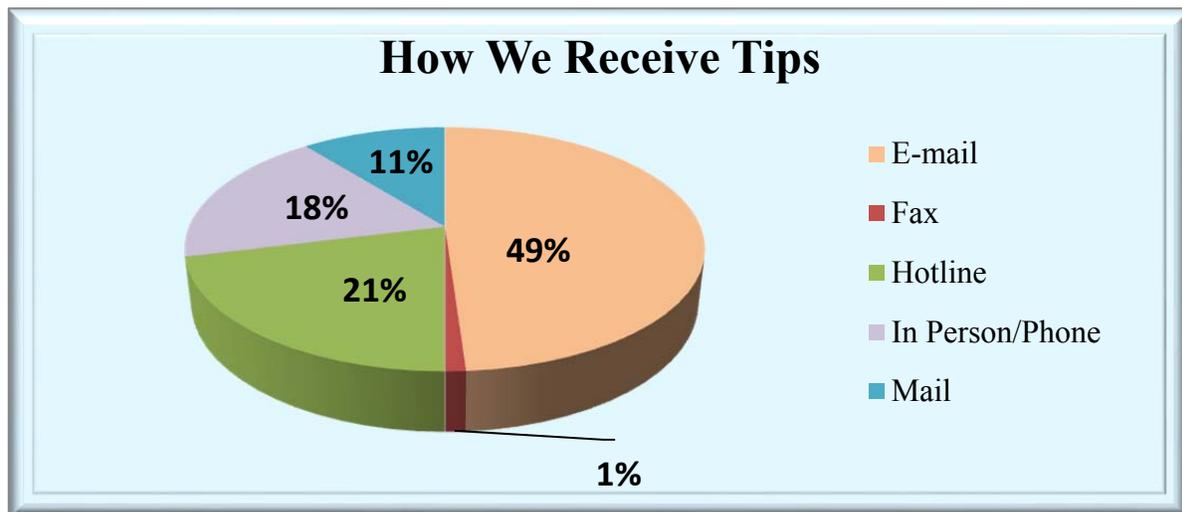
¹ The OIG has provided an estimate of actual expenditures because the Broward County Accounting Division had not yet finalized actual expenditures for FY 2012 as of the preparation of this report.

COMPLAINTS, TIPS, AND INFORMATION

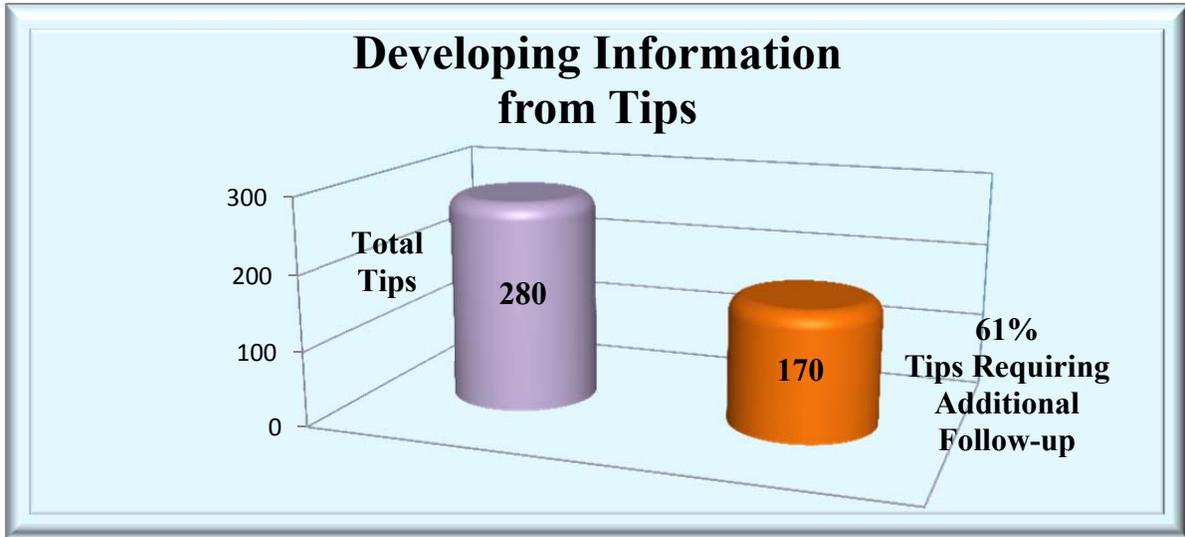
The OIG's authority to commence an investigation is based on the existence of good cause to believe that any official, employee, or provider has engaged in misconduct or gross mismanagement. The OIG may find good cause based upon its own initiative or a sworn complaint.

Tips and Information

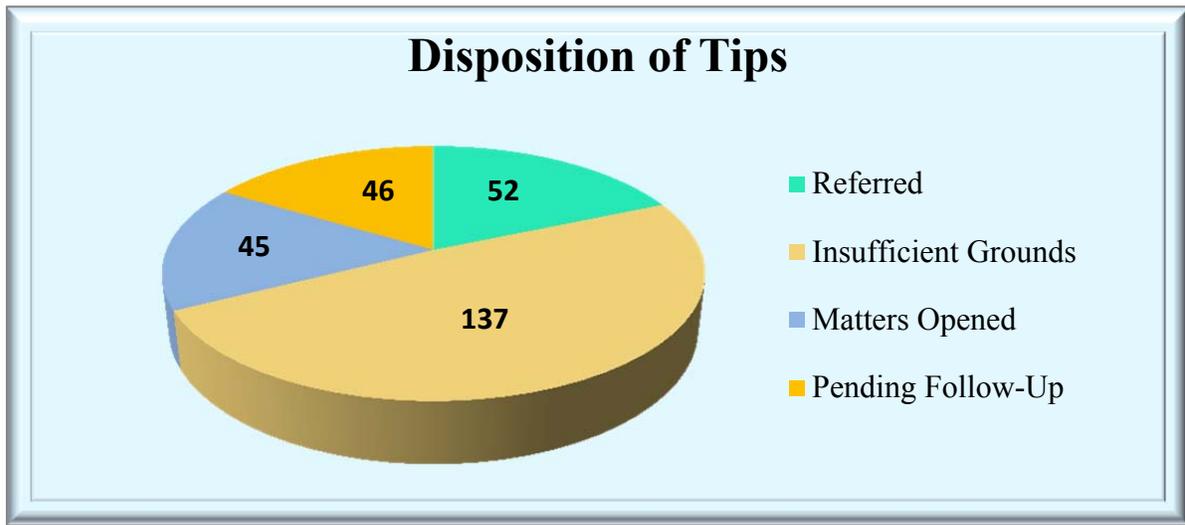
The OIG need not receive information in the form of a sworn complaint in order to begin an inquiry. There are a number of ways to provide information to the OIG. Information may be provided through our Hotline at (954) 357-TIPS, email at InspectorGeneral@broward.org, fax at (954) 357-7857, mail, or in person. Information may be provided without disclosing a name or contact information, although the OIG encourages persons to identify themselves should additional information be needed during the review process.



The OIG received 280 tips during this reporting period, 170 of which required additional follow-up because they did not contain sufficient detail.



Ninety-one tips led either to the establishment of good cause to open an investigation, or are currently pending a final determination of good cause by the OIG. The OIG referred 52 tips to other government agencies for appropriate action.



Complaints

The OIG may also find good cause based on a signed, verified complaint. The Charter requires a complaint to be signed under a penalty of perjury that the complainant has personal knowledge that the facts stated in the complaint are true. Persons who wish to file a complaint with the OIG may obtain a complaint form on the OIG website or by contacting the OIG at (954) 357-7873. The complaint must be completed, signed and mailed to the Broward Office of the Inspector General, One North University Drive, Suite 111, Plantation, Florida, 33324.

The OIG received 35 sworn complaints during this reporting period. After a review of the complaints, including additional inquiry and verification, two of the complaints led to the establishment of good cause to open an investigation. The OIG referred four complaints to other government agencies for appropriate action. Three complaints are currently pending a final determination of good cause.

INVESTIGATIONS

Prosecuting authorities currently are considering bringing criminal charges against several persons as a result of OIG investigations, which have also identified millions of dollars in questionable governmental costs and expenditures. In matters where the OIG is conducting joint investigations with prosecutors or other law enforcement agencies, Section 12.01(D)(1)(b) of the Charter prohibits us from divulging the names of those persons, or otherwise describing the substance of those matters, because to do so would jeopardize pending criminal investigations. Consequently, not all of these investigations have been the subject of an OIG report. In addition, the State of Florida is also considering imposing civil sanctions against an additional person as a result of our investigative activities.

To date, OIG reports have identified over \$3.6 million in questionable costs and expenditures within county and municipal governments due to gross mismanagement and misconduct. Those matters that remain unreported pending criminal prosecution have identified millions more in questionable costs. In addition to identifying the direct financial impact as a part our reporting process, the OIG has made recommendations and required status reports from government agencies to promote and ensure efficiency and accountability in the use of public monies. Following are summaries of significant investigations conducted by the OIG during this reporting period.

Gross Mismanagement of the Small Business Enterprise Certification Process by the Broward Office of Economic and Small Business Development

The OIG issued a finding of gross mismanagement of the Small Business Enterprise (SBE) certification process by the Broward Office of Economic and Small Business Development (OESBD). The Broward County Business Opportunity Act of 2004 (Act) permits businesses certified as an SBE to acquire competitive advantages, including exclusive access to certain Broward County contracts, as well as preferences in county procurement. In return, those businesses seeking SBE certification status are required to demonstrate that they perform a commercially useful function, a classification that excludes brokers. The OIG investigation revealed that the OESBD was aware for years that a vendor, Everytrade International Company, had been acting solely as a broker—and was thus not eligible to obtain SBE status—yet it allowed Everytrade to receive \$748,118.52 in county contracts, including a contract awarded after the OIG provided its preliminary investigation findings to the OESBD.

The investigation also determined that the OESBD's failure to enforce the requirements of the Act was not unique or isolated to Everytrade, but was grounded in long-standing and systemic problems resulting from years of mismanagement. One OESBD official estimated that over half of SBEs were actually brokers.

The OIG found that by allowing brokers to avail themselves of advantages carefully tailored to benefit deserving small businesses, the OESBD undermined the very policies the Broward County Commission sought to effectuate when it created the SBE program, at the expense, and risk, of county funds. We also made a series of recommendations designed to better implement, reinforce, and rectify OESBD's administration of the SBE certification process.

Vendor's Scheme to Misrepresent County Business Enterprise Program Subcontractor Participation

In the second investigation relating to the County's OESBD program, the OIG determined that a subcontractor, Stanford and Sons Trucking Company, orchestrated a scheme to cause the misrepresentation of County Business Enterprise (CBE) participation to the OESBD in connection with an approximately \$6.5 million dollar County public works project for the installation of underground water and wastewater utilities.

The investigation found that in April 2011, the prime contractor, Giannetti Contracting Corporation (Prime), was awarded a county contract that required it to ensure 15% CBE participation on the project, 5.76% of which the Prime then assigned to a certified CBE selected by Stanford, because Stanford was not eligible to participate as a CBE. In December 2011, while the project was ongoing, the Prime submitted reports to the OESBD falsely representing that the certified CBE had participated in the Project and had been paid \$369,530.71 for work that, in fact, Stanford had performed. In furtherance of its scheme, Stanford attempted to pressure the certified CBE into endorsing a check for payment, passing through the payment, and falsely representing to the OESBD that it, rather than Stanford, had performed the work.

The investigation further found that after the certified CBE declined to collude with Stanford, the Prime replaced it with another CBE, the Spearhead Development Group, Inc., which immediately accepted the \$369,530.71 payment and passed virtually all the money to Stanford, along with a subsequent payment of approximately \$57,000. The owner of Spearhead, Donovan Amritt, is the brother of Stanford Amritt, Jr., the owner of Stanford. The investigation determined that the Prime acquiesced in Stanford's scheme. The investigation also revealed additional deficiencies in the OESBD's administration of the CBE program.

Prime Contractor Made Misrepresentations of County Business Enterprise Program Subcontractor Participation

The OIG investigated allegations that a prime contractor had engaged in misconduct by fraudulently misrepresenting a subcontractor's intent to participate on a \$223,884 Broward County Aviation Department airport landscape enhancement project administered pursuant to the CBE Program.

The OIG investigation partially substantiated the allegations of misconduct. The OIG determined that ELAN Landscape, Inc., the project's prime contractor, submitted misleading information to the OESBD, including a CBE letter of intent bearing the false signature of the office manager for a certified CBE subcontractor. A notary employed by ELAN admitted to misconduct by improperly certifying the signature. We also determined that after the project was completed, ELAN submitted a final utilization report which misrepresented the scope of work performed by the certified CBE, but did not purport to exaggerate ELAN's compliance with its CBE participation commitment.

Although ELAN failed to comply with CBE Program procedures, the certified CBE fully participated in the project, so that the County’s CBE commitment goals were met, and the integrity of the project was not materially compromised. However, Florida law prohibits a notary public from notarizing a signature on a document unless the signatory appears before the notary public at the time of notarization, and provides civil penalties for infractions. Accordingly, the OIG provided a copy of its closing memorandum to Florida executive authorities for an independent assessment of misconduct.

Employee Misconduct and Gross Mismanagement by the Broward County Office of the Medical Examiner in the Handling of Narcotic Medications

The OIG found employee misconduct and gross mismanagement by the Broward County Office of the Medical Examiner and Trauma Services (ME) in connection with the handling and disposal of several thousand narcotic medication pills. The ME could not determine the whereabouts of at least 3,600 pills, including over 2,100 oxycodone and over 150 hydrocodone, which are classified as controlled substances—many of which may have entered into an illicit stream of commerce.

The OIG investigation confirmed that ME Legal Investigator Supervisor Linda Krivjanik engaged in misconduct in connection with the handling and disposal of the medication pills, which were missing from the ME’s office, and also determined that the supervisory ME staff, including former Chief Medical Examiner Joshua Perper and Ms. Krivjanik, engaged in gross mismanagement by failing to ensure that medications entrusted to its care, including narcotic medications, were properly secured, cataloged, and destroyed. The investigation also found that ME personnel openly derided the lack of professionalism at the ME, and the Interim Chief Medical Examiner at the time of the report acknowledged that as recently as 2010, the manner in which medications were stored resembled a “free for all.” Ms. Krivjanik was terminated from her position and a new Medical Examiner was selected in April 2012.

Gross Mismanagement of Public Funds by the City of Lauderdale Lakes

The OIG determined that officials of the City of Lauderdale Lakes grossly mismanaged public funds entrusted to its care. As a result, in less than four years, the city went from having over \$6 million in general fund reserves to being unable to satisfy \$9 million in debts for public safety costs, as well as incurring a \$2.5 million debt to its own Community Redevelopment Agency (CRA).

The OIG investigation uncovered multiple instances of gross mismanagement, including financial decisions which ultimately led to the city's financial failures. Specifically, the OIG investigation determined that the city's former finance director, Larry Tibbs, under the authority of the former city manager, Anita Fain-Taylor, continued to propose inflated revenue estimates that ignored the downturn in the economy and multiple financial red flags. While actual city revenues were declining by the millions, Mr. Tibbs employed various maneuvers to supply inflated and unsupported estimates for a fictitious revenue budget of over \$18.6 million.

The investigation also substantiated allegations that the city's CRA funds were improperly used to pay city operating expenses, a practice which the Chairman of the CRA Board—who was not aware of it at the time—described as a “shell game.” The city never paid the tax revenues owed to the CRA in 2010, and used a non-existent services agreement to budget for \$800,000 in revenues from the CRA in 2011. Finally, we found that although the city's elected officials were misled about the city's financial condition, they also failed to properly review and comprehend written reports submitted by independent auditors, and failed to demand more frequent financial reports from the city administration.

Misconduct by the City Manager of Lauderdale Lakes in the Contracting for Management Services of a Former City Employee

The OIG issued a finding that Jonathan K. Allen, the city manager of the City of Lauderdale Lakes, engaged in intentional bid splitting and other misconduct to improperly authorize a contract for the management services of Manny Diez, a former city employee.

The OIG investigation determined that after Mr. Diez informed Mr. Allen that he was associated with A.D.A. Engineering, Mr. Allen asked him to return to the city as the interim Public Works Director. ADA provided a proposal to Mr. Allen for Mr. Diez' services in the amount of \$61,000 for seventeen weeks of part-time service. In order to bypass a legal prohibition which required the approval of the City Commission for any contract over \$25,000, Mr. Allen directed Mr. Diez to split the proposal for the explicit purpose of bringing it under Mr. Allen's \$25,000 award authority. In addition, to avoid competitive solicitation requirements, Mr. Allen purported to obtain ADA's services through an existing contract dating back to 2006. That contract, however, was for engineering services rather than the professional services Mr. Diez would be providing in managing and administering

the Public Works department. Finally, Mr. Allen agreed to pay Mr. Diez a significantly higher rate than that of recent Public Works Directors. Mr. Diez admitted that Mr. Allen advised him to split the proposal amount to ensure that the initial proposal would be within Mr. Allen's award authority.

The investigation also found that in contracting with his favored vendor instead of conducting a competitive solicitation, Mr. Allen violated not only the City Code, but also basic tenets of good public policy. By contracting for Mr. Diez' services, Mr. Allen made him responsible for overseeing existing ADA contracts with the city, as well as identifying possible future work which ADA might receive, thus creating both real and apparent conflicts of interest.

Vendor Knowingly Permitted Unlicensed Managers to Oversee Security Services at Port Everglades and the Fort Lauderdale-Hollywood International Airport

The OIG discovered that AlliedBarton Security Services LLC, a vendor that provides security services at both the Port Everglades Seaport and the Fort Lauderdale-Hollywood International Airport, failed to ensure that its top officials at the Seaport and the Airport obtained legally required licenses from the Florida Department of Agriculture and Consumer Services, Division of Licensing (DOL). AlliedBarton was contracted to provide services including checkpoint security, patrol duty, opening of gates, checking credentials and traffic control.

The OIG investigation determined that AlliedBarton's District Manager, Anne Marie Cummings, and Project Manager, David Macedo, managed day-to-day security operations of licensed security personnel at both the Seaport and the Airport without possessing the proper licenses as required by Florida law. The investigation also determined that AlliedBarton knew that Ms. Cummings and Mr. Macedo were not licensed when they assigned them to manage security functions and to direct the activities of licensed employees at the Seaport and the Airport. In fact, Ms. Cummings had applied for licensure on three separate occasions, and each time the DOL denied her application, in part because it concluded that she did not have the security experience required to qualify for the licenses.

The OIG's investigation found no fault with the day-to-day security services provided by AlliedBarton at the Seaport and the Airport. Nevertheless, when AlliedBarton failed to ensure that Ms. Cummings and Mr. Macedo were properly qualified and licensed, it violated Florida law, and also violated the terms of its \$19.5 million contract with the county. Mr. Macedo's application for a managerial

security license was submitted during the pendency of the investigation and approved by the DOL. Mr. Macedo is now appropriately licensed, and Ms. Cummings is no longer with AlliedBarton.

CONTRACT AND PROCUREMENT OVERSIGHT

In December 2011, the OIG initiated its Contract and Procurement Oversight Program (CPOP) to fulfill its responsibility as an independent watchdog over the expenditure of taxpayer funds. The CPOP program is a natural outgrowth of the OIG's responsibility to detect gross mismanagement, which the Charter defines as "material waste or significant mismanagement of public resources." The objective of CPOP reviews is to detect the vulnerabilities that make government entities susceptible to the waste of public resources, and prevent that waste whenever possible. Utilizing the OIG's collective procurement, investigative and legal experience, the program is designed to randomly review recent or ongoing procurements and test the processes of each governmental entity to determine the existence of vulnerabilities.

As part of its initial education and outreach effort, to date, OIG staff has met with 29 of the 32 governmental entities within our jurisdiction. These meetings provided an opportunity for the OIG to learn about the entity's processes, meet their procurement professionals, and provide information about the CPOP program and its objectives.

Although the program has been in existence less than a year, it has already contributed to cost-savings and an increase in efficiency in several municipalities. OIG staff worked with the City of Lighthouse Point to review a prospective procurement and provided the city with various recommendations to strengthen its solicitation, all of which were adopted. Likewise, the City of Dania Beach has cooperated with the OIG to eliminate ambiguities in a solicitation for a waterfront revitalization plan. By amending its solicitation and providing additional time for a response, the city eliminated an ambiguity that may have hindered open competition. In addition, the OIG worked with the City of Cooper City to improve the evaluation phase of its procurement process. A CPOP review of two recent contracts revealed that the evaluation phase of procurements required better planning and increased transparency. As a result, the OIG collaborated with the city to fashion recommendations that will lead to an improved procurement process, while still meeting the specific needs of its residents.

On the county level, the OIG reviewed the procurement process used to award a \$9 million janitorial services contract. After a vendor raised concerns of favoritism, the OIG reviewed the procurement and found no evidence of favoritism. By validating the process used to rank the proposals, the OIG helped prevent the inevitable waste of taxpayer dollars which occurs when a valid procurement is wrongly rejected.

The OIG's Contract and Procurement Oversight Specialist also works with Special Agents to investigate misconduct or gross mismanagement relating to procurement, identified either by a CPOP review, or through other sources. As described above, the OIG substantiated allegations of bid-splitting by the city manager of the City of Lauderdale Lakes to undermine procurement controls.

ETHICS

The OIG's authority extends to the enforcement of ethics codes, including Broward Code of Ordinances Section 1-19, *Code of Ethics for Elected Officials* (Code of Ethics), which was made applicable to all Broward elected officials in January 2012. The Code of Ethics establishes standards of conduct regarding acceptance of gifts, outside/concurrent employment, lobbying, honest services, solicitation and receipt of contributions, procurement selection committees, financial disclosures, and training and education.

Even before the Code of Ethics was made applicable to Broward municipal elected officials, the OIG worked diligently to improve it and prepare to enforce it. In August 2011 the OIG supplied the Broward County Commission, at its request, with an in-depth review of proposals to expand the Code of Ethics to municipal officials. As part of our ethics enforcement efforts, the OIG reviews all information received for possible violations of the Code of Ethics, the Florida ethics code, and Sunshine law violations. In order to ensure that the OIG could properly investigate ethics violations, we trained all staff on the application of the Code of Ethics and other relevant statutes. Although the Code of Ethics was only expanded to include municipal officials in January of this year, the OIG has nonetheless received 27 tips and five signed complaints relating to possible ethics misconduct during the present reporting period, several of which led to matters that are presently under investigation.

The OIG is also responsible for ensuring that elected officials are in compliance with the disclosure and training requirements contained in the Code of Ethics.

This task has been particularly important in 2012, since this is the first year that Broward elected officials have been required to post their required financial disclosure forms for public inspection on a searchable internet database. In September 2012, after the deadline for posting lapsed, the OIG conducted a comprehensive review and discovered that 70% of Broward elected officials were not in compliance with the posting requirement. On September 12, 2012, the OIG issued letters to 127 non-compliant county and municipal elected officials notifying them of the code's requirements. The OIG then worked with the elected officials to bring all of them into compliance, even going so far as to arrange for the county to post the disclosures of the elected officials for two small municipalities that did not have access to a website. As a result, fully 100% of Broward's elected officials posted their disclosure forms by the end of the month, and the OIG has published the internet addresses on its website to facilitate public inspection.

INTERGOVERNMENTAL COOPERATION

In an effort to reduce duplication and maximize resources, the OIG has committed to building relationships with law enforcement, regulatory, and governmental agencies to conduct investigations as efficiently as possible. In addition to our participation as a member of the Broward County Public Corruption Task Force, the OIG has fostered working relationships with the FBI and other federal authorities, the Florida Department of Law Enforcement, the Broward Sheriff's Office, municipal police departments including the Fort Lauderdale Police Department, the Broward State Attorney's office, and the United States Attorney for the Southern District of Florida, and the Florida inspector general community. The OIG has also developed a mutually beneficial partnership with the Broward County Auditor in connection with its audit and CPOP program functions.

MOVING FORWARD

Although we are proud of the OIG's progress to date, we appreciate that we must continue to plan, implement, and refine practices and procedures that will enable us to realize our commitment to ensure integrity and accountability in government. In the coming year, the OIG will bring on a second Contract and Procurement Oversight Specialist to strengthen the CPOP program, which will enable us to greatly expand our review of government procurement practices. The CPOP program will also regularly convene educational outreach sessions specifically

designed to address the needs, concerns, and conduct of county and municipal vendors.

The OIG will continue to refine and enhance its ethics program to meet the needs of Broward residents and officials. Soon, we will be adding an Ethics Counsel to our team to provide a greater emphasis on ethics-related matters. The OIG is also developing a program that will be available to provide training required by the Code of Ethics to all Broward elected officials, and will eliminate the training costs currently borne by the county and its municipalities.

The OIG will strive to improve education and outreach efforts with all county and municipal employees, as well as all Broward residents. These efforts, including developing a larger public relations footprint, are intended to encourage all to notify the OIG about suspected corruption, fraud, waste, abuse, ethics violations, and gross mismanagement.

Finally, the OIG will prepare to seek accreditation by the Commission for Florida Law Enforcement Accreditation (CFA). The acknowledgement of professionalism that CFA Accreditation provides will advance our mission by assuring our intergovernmental partners and Broward officials, stakeholders, and residents that the OIG routinely conducts its affairs with the highest degree of professional excellence.