

g. In those instances where the Division of Inspector General believes it to be in the best interests of the investigation, the Division of Inspector General has the authority and duty, after consulting with the Clerk of the Circuit Court & Comptroller or Pinellas County Administrator as applicable, to:

- 1) take control/limit employee access, and/or gain full access to all Pinellas County premises utilized by Pinellas County, whether owned or rented, and
- 2) examine, copy and/or remove all or any portion of the contents of any document and equipment.

## 8. MANAGEMENT RESPONSIBILITIES

- 8.1 Great care must be taken in the investigation of suspected improprieties or irregularities so as to avoid mistaken accusations or alerting suspected individuals that an investigation is under way.
  - a. All inquiries from suspected individuals and their attorneys or representatives should be directed to the Division of Inspector General. Proper response to such an inquiry is: "I am not at liberty to discuss this matter."
  - b. Under no circumstances should any reference be made to "what you did," "the crime," "the fraud," "the forgery," "the misappropriation" or any other specific reference.
  - c. No promises should be made.
- 8.2 Management/employees should not contact the suspected individual in an effort to determine facts or demand restitution.
- 8.3 Management/employees are encouraged not to discuss the case, facts, suspicions or allegations with anyone outside the organization or those within the organization who do not have a legitimate need to know unless specifically asked to do so by the Division of Inspector General or law enforcement.
- 8.4 Management/employees are required to cooperate with the investigative process by answering questions, furnishing written statements, volunteering information important to the investigation, etc.
- 8.5 All Pinellas County departments/employees are required to comply with this policy.

## 9. LIMITATION

Nothing in this directive or policy shall be construed to interfere with, limit, restrict or otherwise impair the Pinellas County Management or any official's ability to manage, train, assign or discipline their employees.



## DIVISION OF INSPECTOR GENERAL

### Write:

Public Integrity Unit  
Division of Inspector General  
Fraud Hotline  
510 Bay Avenue  
Clearwater, FL 33756

### Call:

Fraud Hotline  
Phone: (727) 45FRAUD  
(727) 453-7283  
Fax: (727) 464-8386



### E-mail:

fraudhotline@mypinellasclerk.org

### Internet:

Website: [www.mypinellasclerk.org](http://www.mypinellasclerk.org)

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[www.youtube.com/user/PinellasCountyClerk](http://www.youtube.com/user/PinellasCountyClerk)



***These contacts may also be used  
to report cases involving fraud or  
waste of a ward's assets.***



An Accredited Office of  
Inspectors General

## DIVISION OF INSPECTOR GENERAL FRAUD, WASTE AND ABUSE POLICY

OFFICE OF THE CLERK OF THE  
CIRCUIT COURT AND COMPTROLLER  
PINELLAS COUNTY ADMINISTRATIVE DIRECTIVE 19-1  
OFFICE OF THE COUNTY ADMINISTRATOR

[FRAUDHOTLINE@MYPINELLASCLERK.ORG](mailto:FRAUDHOTLINE@MYPINELLASCLERK.ORG)



An independent service offered by  
the Clerk of the Circuit Court  
and Comptroller of Pinellas County.  
The Division of Inspector General  
assists the Clerk in fulfilling an oversight  
responsibility and in finding methods  
to enhance county government operations.

**KEN BURKE, CPA**  
CLERK OF THE CIRCUIT COURT  
AND COMPTROLLER  
PINELLAS COUNTY, FLORIDA

## 1. POLICY

The Pinellas County Clerk of the Circuit Court and Comptroller's Fraud, Waste and Abuse Policy are established to facilitate the development of internal controls that will provide for the detection, prevention and reporting of fraud, waste and abuse directed against county government. It is the intent of this policy to promote awareness of the potential for fraud, waste and abuse throughout the county government, and to provide guidelines and assign responsibility for the development of adequate internal controls and systems.

It is the policy of the Pinellas County Clerk of the Circuit Court and Comptroller to ensure compliance with the principles of right and wrong which govern the conduct of county employees, vendors, consultants, contractors and all other outside agencies/parties doing business with Pinellas County. This policy is intended to communicate the Clerk of the Circuit Court and Comptroller's desire to eliminate unethical practices while creating an environment in which employees and/or citizens are encouraged and comfortable in reporting fraud, waste or abuse.

The law in Florida protects employees from retaliatory or adverse personnel action for disclosing certain information, including, but not limited to, violations of laws which create and present a substantial and specific danger to the public's health, safety or welfare and suspected acts of gross mismanagement or gross waste of public funds. These protections are detailed in Sections 112.3187-112.31895 of the Florida Statutes.

## 2. PURPOSE

This directive provides instruction and guidance for implementing the Fraud, Waste and Abuse Policy adopted by the Clerk of the Circuit Court and Comptroller and Pinellas County Administrator.

## 3. SCOPE

This directive is applicable to all Pinellas County employees.

## 4. DEFINITIONS

4.1 Fraud refers to, but is not limited to, any dishonest or fraudulent act to include forgery or alteration of any document; misappropriation of funds, supplies, etc.; improper handling or reporting of money or financial transactions; profiting oneself or others as a result of inside knowledge; destruction or intentional disappearance of records, furniture, fixtures or equipment; accepting or seeking anything of material value from vendors or persons providing services or materials to Pinellas County for personal benefit; and/or any similar or related irregularity.

4.2 Waste refers to the unnecessary incurring of costs as a result of inefficient practices, systems or controls.

4.3 Abuse refers to violations and circumventions of departmental or agency regulations which impair the effective and efficient execution of operations.

## 5. INVESTIGATIVE RESPONSIBILITIES

5.1 The Clerk of the Circuit Court and Comptroller, Division of Inspector General, has the primary responsibility for investigating all suspected inappropriate activity as defined in this policy. If the investigation substantiates that a fraudulent act has occurred, the Division of Inspector General will notify the Clerk of the Circuit Court and Comptroller, or Pinellas County Administrator, as applicable, and such other County officials, as appropriate. If the substantiated fraudulent act has criminal implications, the Division of Inspector General will consult with law enforcement agencies as necessary, to assist in the preparation and presentation of criminal findings in a court of law.

5.2 The Division of Inspector General, through authorization of the Clerk of the Circuit Court and Comptroller, is hereby authorized to make investigations into Pinellas County affairs and for that purpose may administer oaths and compel the production of books, papers and other evidence material to said inquiry.

## 6. CONFIDENTIALITY

The Division of Inspector General treats all information received confidentially, to the extent allowed by law. Any employee, citizen, contractor, vendor or other interested party who has observed or suspects dishonest or fraudulent activity should notify the Division of Inspector General immediately. Persons observing or suspecting dishonest or fraudulent activity should not attempt to personally conduct an investigation related to such activity.

## 7. PROCEDURES

7.1 A current or former Pinellas County employee who suspects fraud, waste or abuse, and does not desire anonymity, should:

- Report the suspected fraud to the Division of Inspector General.
- If requested, furnish a detailed written statement, under oath, outlining the suspected fraud.
- Cooperate with the investigative process through the furnishing of written statements, interviews, etc.

7.2 A current or former Pinellas County employee who suspects fraud, waste or abuse, and wishes to remain anonymous, should:

- Contact the Division of Inspector General and provide as much detailed information as possible regarding the suspected fraudulent conduct.
- The caller, though anonymous, must be willing to share specific information regarding the suspected fraudulent conduct.

7.3 A member of the public suspecting fraud, waste or abuse, is encouraged to contact the Division of Inspector General with specific and detailed information regarding the suspected fraudulent conduct.

7.4 A supervisor or higher authority receiving a fraud allegation should:

- Compile all information relayed by the reporting individual.
- Contact the Division of Inspector General with all compiled information.
- Cooperate with the investigative process.

7.5 The Division of Inspector General will:

- Maintain a Fraud, Waste and Abuse Hotline, and attempt to secure as much information as possible from the reporting individual.
- Contact law enforcement, as appropriate in the circumstances, and provide fraud, waste and abuse information for consideration as to their involvement in the case.
- Evaluate reported conduct pertaining to any and all departments of Pinellas County and such other activities/entities engaged in the expenditure of county funds.
- Report investigative findings to the County Administrator or Clerk of the Circuit Court and Comptroller, as applicable, in an interim report. If interim findings are of a countywide nature or are otherwise significant, the Board of County Commissioners may also be notified if any of their personnel are involved.
- Report any significant findings to the County Administrator, Clerk of the Circuit Court and Comptroller and Board of County Commissioners, as applicable, in a final report.
- Work with law enforcement authorities as determined necessary during the course of the investigation and refer applicable findings to appropriate authorities upon completion.