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REPORT NO. 2026-14

TO: Blaine Williams, Assistant County Administrator

FROM: Melissa Dondero, Inspector General/Chief Audit Executive *MD*
Division of Inspector General

DIST: The Honorable Chair and Members of the Board of County Commissioners
Barry Burton, County Administrator
Ken Burke, CPA, Clerk of the Circuit Court and Comptroller

SUBJECT: Follow-Up Investigation of Airport Personnel Travel and Conflict of Interest

DATE: May 15, 2026

This memo serves to inform you that the Division of Inspector General (IG) completed a Follow-Up Investigation of Airport Personnel Travel and Conflict of Interest. The purpose of our follow-up review was to determine the status of previous recommendations for improvement.

The purpose of the original investigation was to determine if:

1. The Respondent used County funds for travel that was not for County business.
2. The Respondent used County funds for travel for a non-County employee.
3. The Respondent was reimbursed for meals provided during a conference.
4. The Respondent accepted gifts from County vendors and/or potential County vendors.
5. The Respondent had a conflict of interest with an agency that provides funding to the Airport.

To determine the current status of our previous recommendations, we surveyed and/or interviewed management to determine the actual actions taken to implement recommendations for improvement. We performed testing to verify that management's action plans have effectively addressed the investigation findings. The extent and timing of testing were based on the significance of the findings and management's planned implementation completion date.

Our follow-up investigation was conducted in accordance with the *Principles and Standards for Offices of Inspector General* of the Association of Inspectors General and *The Florida Inspectors General Standards Manual* from The Commission for Florida Law Enforcement Accreditation. Accordingly, it included such tests of records and other procedures as we considered necessary in the circumstances.

Our follow-up testing was performed during the month of April 2026. The original investigative period was from October 2024 through June 2025. However, transactions and processes reviewed were not limited by the investigative period.

Of the three recommendations in the original investigation report, we determined that two have been implemented and one has been partially implemented. The status of each recommendation is presented in this follow-up report.

Original Report Reference

To view the original report (Report No.: 2025-13), published in the report section of our website, please use the following link:

[RPT2025-13 Investigation of Airport Personnel Travel and Conflict of Interest](#)

Recommendation Implementation Status

The table below reports on the status of management’s action plans to implement the recommendations contained in the original investigation report.

FINDING	PREVIOUS RECOMMENDATION	STATUS
1	<i>There is No Written Policy Documenting The Airport’s Expense Allowances To Promote Its Activities.</i>	
A	Develop a written policy for allowable Airport travel and entertainment expenditures.	<p>Partially Implemented</p> <p>The Airport, the Office of Management and Budget, and Visit St. Pete-Clearwater are collaborating to revise a consolidated Travel Policy applicable to all three departments. This effort began in February 2026 and will take time to complete. The draft policy will be submitted to the Clerk of the Circuit Court and Comptroller prior to presentation to the Board of County Commissioners for approval.</p>
B	Develop and implement procedures for documenting and reviewing Airport travel and entertainment expenditures. This could include a template that captures the purpose of the travel and/or expenditure, the names of the attendees, and any other information deemed pertinent for the approver to review.	<p>Implemented</p> <p>In August 2025, the Airport implemented a standardized template to document all entertainment expenditures. The IG reviewed the Entertainment Expense Form and confirmed the information provides the necessary and pertinent information for justification, review, and approval of the expenditure.</p>
C	Consult with the County Attorney to establish department-specific guidelines regarding gifts or free trips.	<p>Implemented</p> <p>Airport Management confirmed that Airport employees will not accept free trips from any vendor or consultant, including complimentary airfare or lodging. If travel is required for Airport promotional activities or other business purposes, the Airport will fund its own travel in accordance with the governing Travel Policy.</p>

We appreciate the cooperation shown by the staff of County Administration and the Airport during the course of this review.