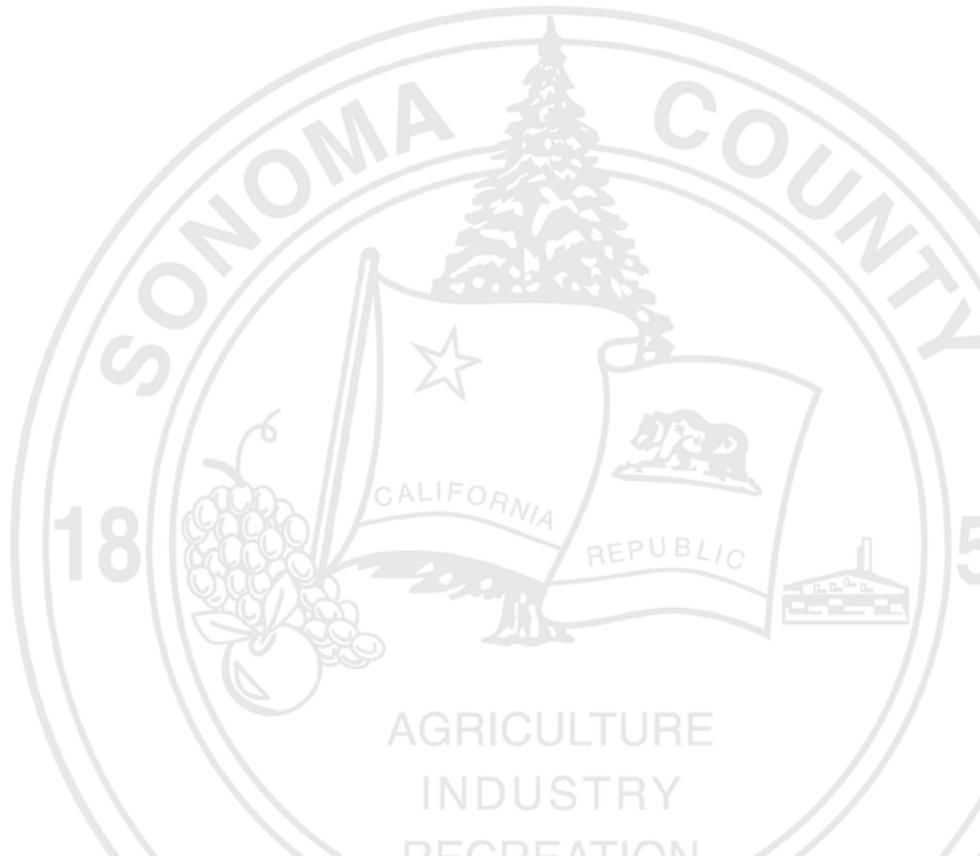




# Fraud, Waste and Abuse Program Report

**July 1, 2025 through December 31, 2025**





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# Introduction

The Sonoma County Fraud, Waste, and Abuse Program was established by the office of the Auditor-Controller-Treasurer-Tax Collector (ACTTC) in June 2021 to provide an avenue for employees and citizens to contribute to the accountability, transparency, and oversight of the County of Sonoma by reporting suspected fraud, waste, and abuse.

The Fraud, Waste, and Abuse Program includes a whistleblower hotline with a toll-free number and website that are accessible 24 hours a day, 7 days a week, administered by an independent hotline provider. Reports may be submitted anonymously.

Reports received are reviewed by the ACTTC Internal Audit Division, in conjunction with County Counsel, Human Resources, and Department Heads, as appropriate.

## Objective

The primary objective of the Fraud, Waste, and Abuse Program is to provide a means for County employees and citizens to confidentially report suspected fraud, waste, or abuse of County resources. The Fraud, Waste, and Abuse Program is not meant to accept reports outside the control of the County of Sonoma government. Reports of this nature may be turned over to an appropriate state or law enforcement agency.

Examples of reports handled by the Fraud, Waste, and Abuse Program include, but are not limited to:

- Missing Cash
- Embezzlement
- Falsified Documents
- Theft of Equipment and Supplies
- Vendor Kickbacks
- Conflict of Interest
- Personal Use of County Assets
- Briber

## Authority

The Auditor-Controller-Treasurer-Tax Collector operates the Fraud, Waste, and Abuse Program under authority granted by California Government Code Section 53087.6 and pursuant to guidelines approved by the Board of Supervisors.

## Internal Audit Team

Damian Gonshorowski, *Audit Manager*  
Olga Gray, *Senior Internal Auditor*  
Melissa Osso, *Senior Internal Auditor*  
Venina Ranadi, *Senior Internal Auditor*

For more information on the program, please visit our website at

<https://sonomacounty.ca.gov/acttc/audit/fraud-hotline>

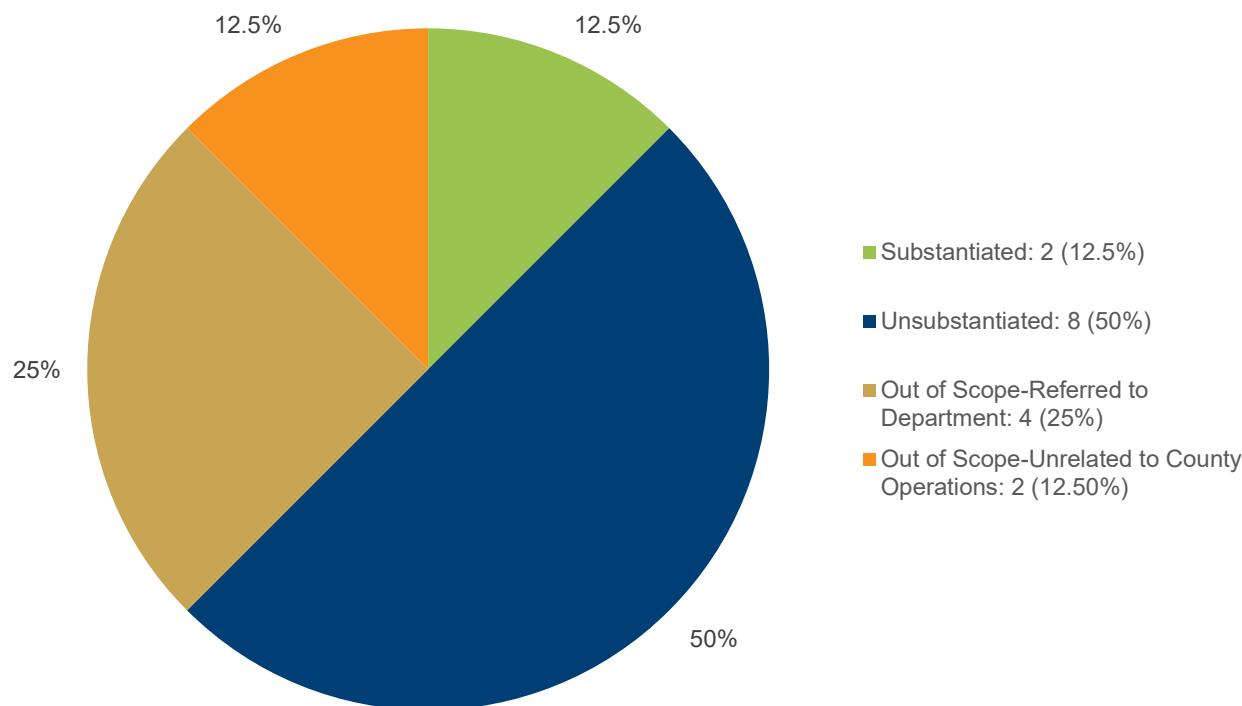
# Fraud, Waste, and Abuse Program Statistics

The Sonoma County Whistleblower Hotline has received 136 reports of suspected fraud, waste or abuse since its inception in June 2021. The table below summarizes the Whistleblower Hotline activity for the period of July 1, 2025, through December 31, 2025.

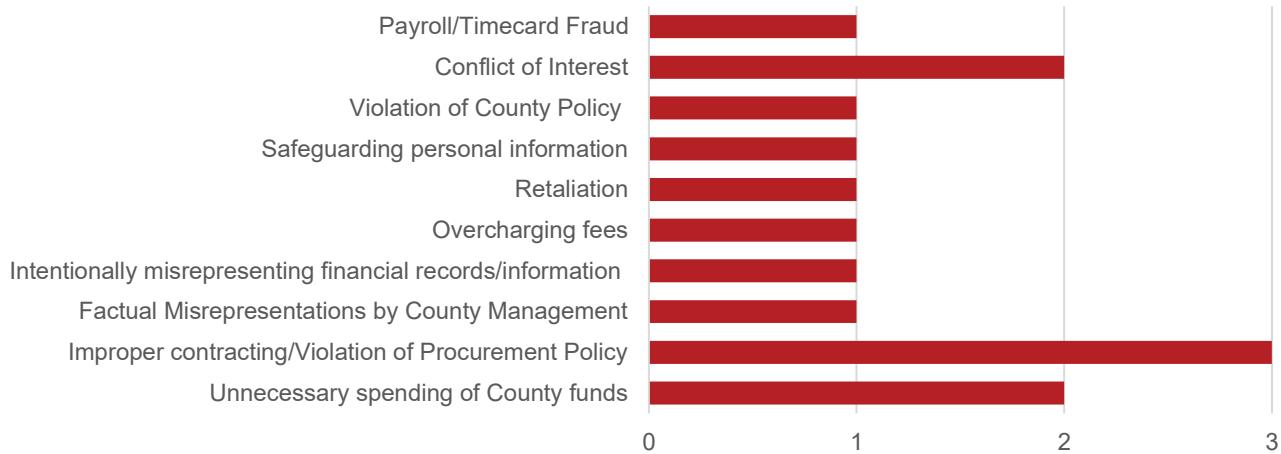
Open cases as of July 1, 2025	12
New reports received	7
Reports closed	<u>(16)</u>
Open cases as of December 31, 2025	<u>3</u>

Of the 16 cases closed during the reporting period, 6 were closed because the complaint was outside the scope of the Fraud, Waste, and Abuse Program. 8 were investigated and unsubstantiated, and 2 were investigated and substantiated. Additional information for the 2 substantiated complaints is provided later in this report, on page 5.

Disposition of Closed Reports (7/1/2025-12/31/2025)

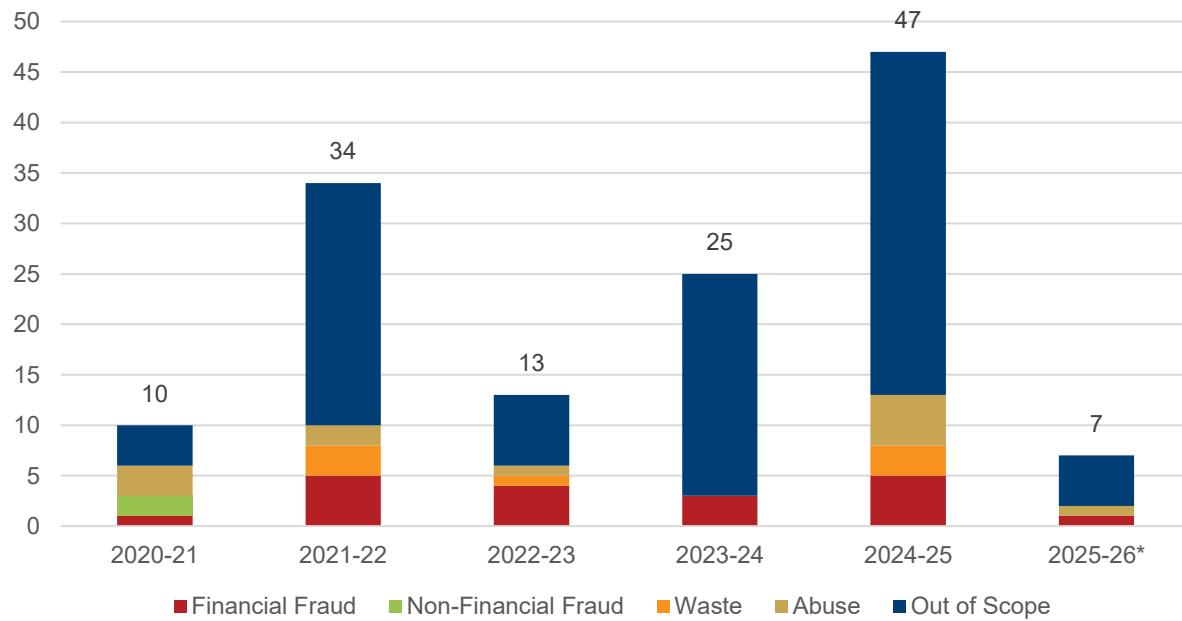


## Types of In-scope Allegations\* Closed 7/1/2025-12/31/2025



\*Includes allegations as reported by whistleblowers, inclusion in this table does not indicate the allegation was investigated or substantiated. Some reports include multiple allegations therefore there may be more allegations included in this table than there are closed reports.

## Reports Received by Year



\*2025-26 includes the first six months of the fiscal year (July 1, 2025 - December 31, 2025).

**Out of Scope Reports:** The Whistleblower Hotline receives many complaints that are outside the scope of the Fraud, Waste and Abuse Program. Complaints that relate to County operations are referred to the appropriate department and closed. Complaints that are unrelated to County operations entirely are closed and may be referred to an outside agency by the Internal Audit Division (IAD), if appropriate. IAD notifies whistleblowers when a complaint is out of scope and suggests a more appropriate agency/hotline to report the complaint to, if known.

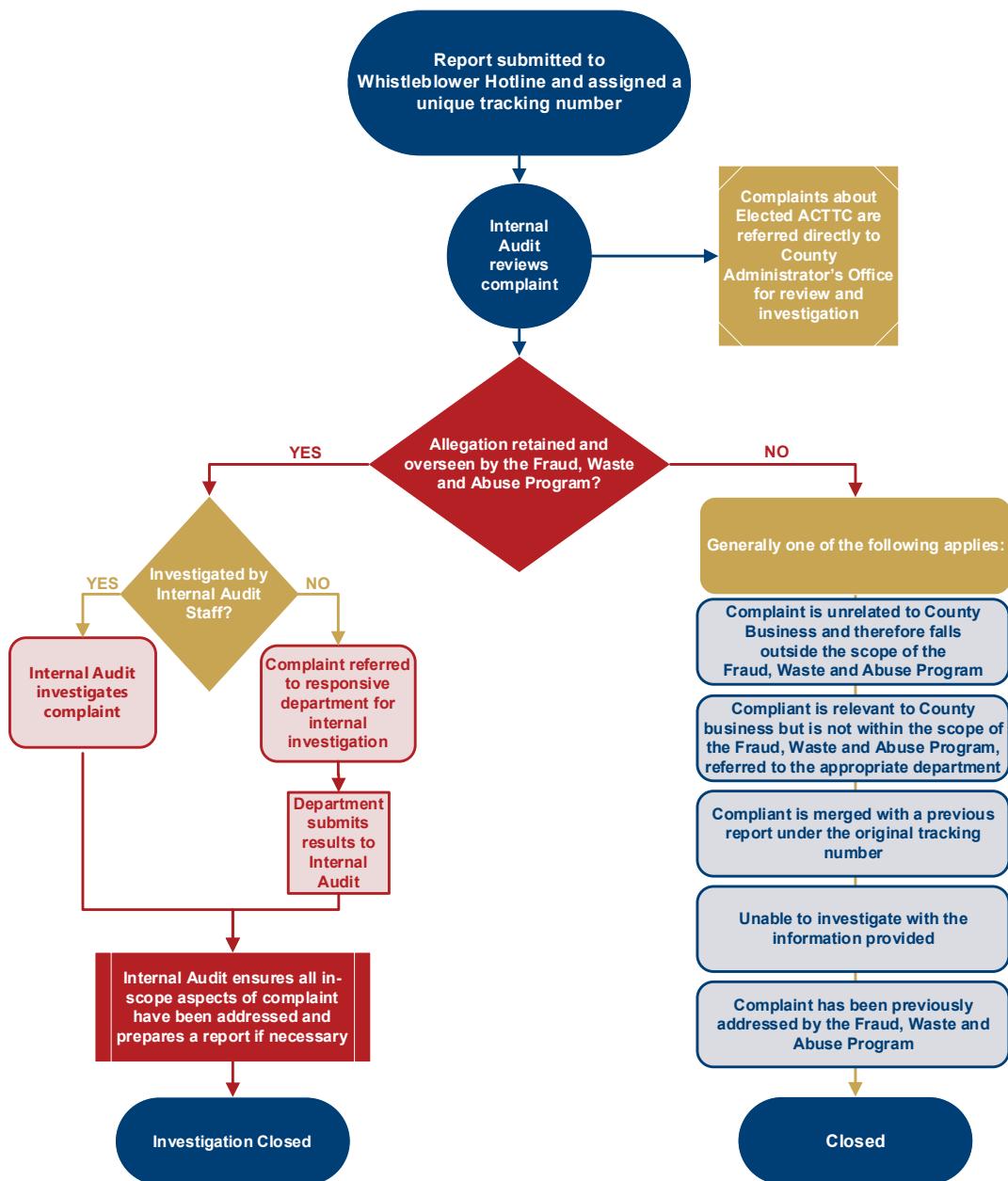
# Substantiated Complaints

Allegation	Resolution Based on Investigation
<p>A Sonoma Water employee shared EFS login credentials with another employee who used those credentials to approve vouchers and also had the ability to initiate vouchers.</p>	<p>The investigation substantiated that a Sonoma Water employee shared their Enterprise Financial System (EFS) login credentials with another employee while on paid leave. The colleague used those credentials to approve more than 100 vouchers during that period. Because the colleague had authority to create vouchers under their own EFS credentials, using another employee's credentials created an opportunity for the colleague to both create and approve vouchers, bypassing system controls designed to prevent a single user from performing both functions. This activity violated Administrative Policy 9-2 (Computer Use).</p> <p>Management reviewed all voucher approvals completed with the shared credentials and verified that each transaction was valid and payable. No evidence of fraud was identified.</p> <p>Corrective Actions Taken by Sonoma Water Management:</p> <ul style="list-style-type: none"> <li>• Reset employee password for EFS login.</li> <li>• Reinforced to staff that login credentials must not be shared under any circumstances.</li> <li>• Documented and distributed procedures for establishing a proxy when an employee is unavailable to perform voucher approvals.</li> <li>• Obtained written confirmation from staff acknowledging their understanding of the policy and commitment not to share login credentials.</li> </ul>
<p>Unauthorized sharing of personal information.</p>	<p>The investigation substantiated that a client was inadvertently able to view limited personal information of other clients while in the Public Defender's Office (PDO) front lobby. This occurred due to the configuration of lobby computer equipment, which allowed information from a case management system to be visible on a monitor used in the lobby area.</p> <p>Upon discovery of this incident, the PDO implemented corrective actions to prevent any future exposure of client information. These actions included disabling the lobby monitor, installing a privacy screen, and removing access to justice and client-related systems from the computer used for client video viewing.</p> <p>An additional complaint included in this case was not investigated because it fell outside the scope of the whistleblower program.</p>

\*Complaints above may have included other allegations, only allegations that were investigated and substantiated are included in this table

# Investigation Workflow

The Internal Audit Division (IAD) of the ACTTC is assigned the responsibility of processing Whistleblower Hotline reports received in accordance with applicable laws and regulations. The IAD performs an initial review of each report to determine if the report is within the scope of the Fraud, Waste, and Abuse Program and contains sufficient information to investigate. In-scope reports that fall within the authority and responsibility of the ACTTC are investigated by the IAD, all others are referred to County Counsel, Human Resource or other departments for investigation, as appropriate. The diagram below provides a visual overview of how reports are received and addressed.



# Terms and Definitions

**Financial Fraud:** Any intentional act or omission designed to deceive others that results in the County suffering a loss of money, property, or resulting in other disadvantages to the County's resources or rights and/or the perpetrator achieving a gain of money, property or an advantage to which they would not normally be entitled.

- Falsifying financial records to conceal the theft of County money or property
- Theft or misuse of County money, equipment, supplies or other materials
- Intentionally misrepresenting financial records/information
- Soliciting or accepting a bribe or kickback
- Falsifying payroll/timecard information

**Non-Financial Fraud:** Any intentional false or misleading information provided to the public or a regulatory body or the unauthorized access to data, records or information that exposes the County to adverse consequences.

- Falsifying non-financial reports or information provided to the public, local, state or federal government agencies
- Stealing or accessing without authorization customer/client/employee data, records or non-financial information
- Falsifying maintenance/inspection records

**Waste:** The intentional or unintentional thoughtless, reckless or careless expenditure, consumption, mismanagement, use, or squandering of County resources. Waste also includes incurring unnecessary costs because of inefficient or ineffective practices, systems, or controls.

- Unnecessary spending of County funds to purchase supplies, equipment or services
- Failure to reuse or recycle major resources or reduce waste generation
- Failing to file reports or pay amounts owed timely, leading to interest and penalties

**Abuse:** Intentional destruction, diversion, manipulation, maltreatment, or misuse of County resources. Abuse can occur when someone benefits in a financial manner and also when someone does not benefit financially. Extravagant or excessive use as to abuse one's position or authority. Abuse can occur in financial or non-financial settings.

- Failure to report damage to County equipment or property
- Receiving favors for awarding contracts to certain vendors
- Using one's position to gain a financial advantage that is not available to others
- Creating unneeded overtime
- Misusing one's official position for personal gain or the gain of a family member, business partner, an organization for which the official serves as an officer, director, trustee, or employee, or with which the official is negotiating future employment
- Travel choices that are contrary to existing travel policies or are unnecessarily extravagant or expensive
- Making procurement or vendor selections that are contrary to existing policies or are unnecessarily extravagant or expensive

# File a Report with the Whistleblower Hotline

Report suspected fraud, waste, or abuse occurring at the County of Sonoma. The Whistleblower Hotline has a website for online report submission and a live operator available to receive calls from County employees and citizens 24 hours a day, 7 days a week, 365 days a year. Calls are handled by an independent third-party answering service specifically trained in obtaining the information required to document an allegation.

The reporter can choose to remain anonymous or to provide name and contact information. Employees and citizens may contact the Fraud, Waste and Abuse Hotline directly at:

- 1-800-921-6840 (County Employees)
- 1-800-916-8745 (Members of the Public)
- <https://integritycounts.ca/org/countyofsonoma>

## What Information to Submit

Allegations of fraud, waste, and abuse require sufficient detailed information in order to be investigated. Reports that don't include sufficient information are closed without investigation.

The following information should be included in reports:

- Your name and contact information **unless you wish to remain anonymous**
- Date(s) that the alleged incident(s) occurred
- Location where the alleged incident occurred
- County department, division, or functional unit
- Name(s) of the individual(s) involved, if known
- **Detailed** information of the alleged incident/concern
- Relevant supporting documentation if applicable

## Protection for Whistleblowers

In accordance with California Labor Code section 1102.5 (b), the County of Sonoma, or any person acting on behalf of the County of Sonoma, is prohibited from retaliating against an employee for disclosing information, or because the County of Sonoma believes that the employee disclosed or may disclose information, to this Whistleblower Hotline, to a government or law enforcement agency, to a person with authority over the employee or another employee who has the authority to investigate, discover, or correct the violation or noncompliance, or for providing information to, or testifying before, any public body conducting an investigation, hearing, or inquiry, if the employee has reasonable cause to believe that the information discloses a violation of state or federal statute, or a violation of or noncompliance with a local, state, or federal rule or regulation, regardless of whether disclosing the information is part of the employee's job duties.