

STATE OF OHIO  
OFFICE OF THE INSPECTOR GENERAL

RANDALL J. MEYER, INSPECTOR GENERAL

REPORT OF  
INVESTIGATION



AGENCY: OHIO DEPARTMENT OF TAXATION  
FILE ID NO.: 2014-CA00065  
DATE OF REPORT: AUGUST 12, 2015

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Randall J. Meyer  
Ohio Inspector General



STATE OF OHIO  
**OFFICE OF THE INSPECTOR GENERAL**

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RANDALL J. MEYER, INSPECTOR GENERAL

**REPORT OF INVESTIGATION**

**FILE ID NUMBER:** 2014-CA00065

**SUBJECT NAME:** Lu Zhang

**POSITION:** Tax Auditor Agent 3

**AGENCY:** Ohio Department of Taxation

**BASIS FOR INVESTIGATION:** Agency Referral

**ALLEGATIONS:** Failure to Comply with State Law and/or Regulations;  
Failure to Comply with State or Department Rules, Procedures or Policies;  
Operating a Business or Private Interest on State Time;  
Misuse or Abuse of State Property or Equipment

**INITIATED:** September 30, 2014

**DATE OF REPORT:** August 12, 2015

## **INITIAL ALLEGATION AND COMPLAINT SUMMARY**

The Ohio Department of Taxation (ODT) notified the Office of the Ohio Inspector General on September 24, 2014, about an employee in their audit division, Lu Zhang, who was potentially using state time and resources to further her personal business and accessing tax information on other taxpayers engaged in similar businesses. A preliminary review by the ODT Internal Audit Division found that Zhang, from June 24, 2014, to September 9, 2014, had accessed, on numerous occasions, the ODT system that houses sales and use tax information. Information viewed appeared to have been tax information for entities she was not assigned to audit as part of her duties as a tax auditor agent 3, as well as information related to her own personal business. An investigation was opened on September 30, 2014.

The Ohio Department of Taxation placed Zhang on administrative leave effective September 12, 2014, and she resigned on October 24, 2014.

## **BACKGROUND**

### *Ohio Department of Taxation*

The Ohio Department of Taxation is responsible for the enforcement and administration of all state taxes except insurance and motor vehicle license taxes. As part of its duties, the department registers taxpayers, processes tax returns, determines tax liabilities, issues refunds and assessments, conducts audits and enforces Ohio's tax laws. ODT is also responsible for determining revenue distributions to local governments, reimbursement for property tax relief, sales and use tax distributions and allocations to counties from the public library and local government funds. The department is overseen by the tax commissioner, who is appointed by the governor and confirmed by the Ohio Senate. The Ohio Department of Taxation is funded through general revenue funds, application fees, and fees charged for administering various state and local taxes.<sup>1</sup>

### *Applicable Rules, Policies, and Procedures*

The following rules, policies, and procedures were reviewed as part of this investigation:

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<sup>1</sup> Source: Biennial budget documents.

In response to a report of investigation issued by the Office of the Ohio Inspector General, the Ohio General Assembly passed House Bill 648, establishing §1347.15 of the Ohio Revised Code. This section defines “Confidential Personal Information” and identifies what personal information is not to be considered as a public record. Common examples of confidential personal information (CPI) protected by this section include an individual’s Social Security number, driver’s license number, medical records, and records whose release is prohibited by state or federal law. Possible ramifications for an employee violating this code section by improperly accessing or releasing CPI range from administrative action to criminal charges and being permanently prohibited from state employment.

This section also mandates that all state agencies, excluding the judiciary and state assisted institutions of higher-learning, develop and adopt agency rules regarding the access of CPI that is maintained by the agency. The law specifies several requirements that agencies must incorporate into their rules concerning the handling of CPI, including but not limited to: a defined criteria used to determine an employee’s level of access to CPI and a list of the valid reasons as to when employees are permitted to access CPI; a procedure for logging and recording employee access to CPI and the requirement that a password or other authentication must be used to access CPI stored electronically; that agencies designate an employee to serve as the data privacy point-of-contact who ensures that CPI is properly protected; the requirement that agencies must provide on demand to an individual, a detailed listing of all CPI maintained by that agency concerning that individual, unless the CPI relates to an investigation; and a policy that requires agencies to notify individuals whose CPI has been accessed for an invalid reason.

Ohio Revised Code, §1347.15 requires all applicable state agencies to establish a training program for all employees who access, or who supervise employees who access, or who authorize employees to access, confidential personal information, so that all employees are made aware of all statutes, rules, and policies governing access to such information.

The Ohio Department of Taxation established agency rules for handling CPI in Ohio Administrative Code §5703-31, *Accessing Confidential Personal Information*. The department also created Policy No: ODT-CC-001, *Accessing Confidential Personal Information*, which was

effective as of February 1, 2011. Both the Ohio Administrative Code and Ohio Department of Taxation policy state CPI maintained by the Ohio Department of Taxation, "... may only be accessed by ODT employees for valid business purposes." The ODT policy further states invalid or improper access of confidential personal information includes, "... looking up information regarding ... others for which there is no valid business purpose." ([Exhibit 1](#))

Ohio Department of Taxation policy number ODT-002, *Standards of Conduct*, was created by ODT, effective October 17, 2012. The policy states, "... employees must comply with State of Ohio IT statutes, rules, orders, policies, bulletins, procedures, and standards." ([Exhibit 2](#)) The IT standards and policies are administered by the Office of Information Technology, a division of the Ohio Department of Administrative Services. State of Ohio IT Policy No: ITP-E.8, *Use of Internet, E-mail and Other IT Resources*, strictly prohibits the use of any IT resource for personal use, including, "... operating a business, directly or indirectly, for personal gain." ([Exhibit 3](#))

Also effective as of October 17, 2012, is the Ohio Department of Taxation policy number ODT-005, *Conflict of Interest*. The purpose of the policy is to establish standards to ensure compliance with Ohio Revised Code §5703.07, *Bond of tax commissioner – duty to devote entire time to office*, which states, in part:

... each employee of the department of taxation shall devote his entire time to the duties of his office, and shall not hold any position of trust or profit or engage in any occupation, employment, or business interfering with or inconsistent with his duty as commissioner or an employee.

The policy prohibits employees from:

- Engaging in any outside activity that is inconsistent with the employee's time, resources and duties with the department, or in any degree adversely affects or interferes with the performance of such duties; ...

- Engaging in the preparation or completion, outside of the official duties, of any tax returns involving local, county, state, or federal taxation laws for or on behalf of any taxpayer (other than an immediate family member<sup>2</sup>) ... ; or
- Maintaining, consulting, advising on, or auditing the books or records of any taxpayer outside the scope of official employment, including book keeping, which may subsequently be used as the basis for the determination of any local, state, or federal taxation liability.

Before engaging in any activities that may be construed as a conflict of interest, ODT employees must first request approval from their respective supervisors and a review is conducted by the tax commissioner's designee. Currently, the ODT Human Resources Division conducts conflict of interest reviews to determine whether the activity meets the policy standard, and either approves or rejects the employee's request to engage in the outside activity. ([Exhibit 4](#))

According to ODT's online training portal, Zhang acknowledged reading the "Guidelines for ODT Employees Accessing Confidential Personal Information" on January 26, 2011, and reading the standards of conduct and conflict of interest policies on November 26, 2012.

### **INVESTIGATIVE SUMMARY**

During the investigation, the Office of the Ohio Inspector General requested and received from ODT the following information: applicable policies and procedures, Lu Zhang's conflict of interest review request and any related documentation, list of audits assigned to Zhang as part of her duties as a tax auditor agent 3 (assigned primarily to sales and use tax audits), and STARS access logs showing taxpayer accounts and screens accessed by Zhang. STARS, or the State Taxation Accounting and Revenue System, is the computer system used by the Ohio Department of Taxation to process sales and use tax, including payments and tax returns or forms. The use of STARS for sales and use tax became effective on June 23, 2014. Prior to STARS, ODT

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<sup>2</sup> Immediate family member is defined by ODT as "a spouse of an employee on a joint tax return, or employee's minor child or legal ward."

utilized ITAS, which did not track when employees viewed, but did not make any changes to, a taxpayer account.<sup>3</sup>

An analysis was also conducted on Zhang's state-assigned computer and state email account. Finally, a search of Zhang's work space was conducted where numerous documents not related to Zhang's audit assignments or other ODT matters were identified.

On December 18, 2013, Zhang emailed the ODT Human Resources Division regarding opening a business. In the email, Zhang writes, "I will mainly be an investor, not involved in the day to day business operations, since I already have a full time job. But I will most likely help get the store opened by picking out signage, design the layout of the store. We will have an accountant handle the books and taxes."

In order to obtain more information to determine if Zhang's request would pose a conflict of interest according to Ohio Department of Taxation policy ODT-005, Zhang was sent a reply to her email on January 8, 2014, asking the following questions:

- In your email dated 12/18/13, you wrote, 'We are thinking about opening an [redacted].'<sup>4</sup> Who are the persons to whom the pronoun 'we' refers?
- You further wrote that you would be an 'investor' in the store. What type of business form would own the store (e.g., pass-through entity, corporation)?
- Would you perform any other activities for the benefit of the store or its investors besides picking out signage, design the layout of the store? If so, please briefly describe each of the activities.

On January 9, 2014, Zhang replied by email, stating that "we" referred to herself and a friend, the business would be formed as a limited liability company (or LLC), and that she might work in the store on evenings and weekends, but they would be hiring employees to work in the store.

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<sup>3</sup> For more information on ITAS and STARS see Office of the Ohio Inspector General's Report of Investigation 2012-CA00083, issued on November 21, 2013.

<sup>4</sup> Where the report notes "[redacted]," information has been removed in compliance with the Ohio Department of Taxation's rules prohibiting any identifying information related to a taxpayer from being released. This includes the name and type of business owned by Zhang.

Later that same day, Zhang was sent an email stating that there was "... not a conflict of interest between the duties you described" and her employment. The email further stated:

Please be advised that you may not use state time or resources in furtherance of the outside activity. Additionally, you are reminded that ODT-005 prohibitions for ODT employees include: Engaging in the preparation or completion, outside of the scope of official duties, of any tax returns involving local, county, state or federal taxation laws (other than an immediate family member) or Maintaining [sic], consulting, advising on, or auditing the books or records outside the scope of official employment, including book keeping, which may subsequently be used as the basis for the determination of any local, state, or federal taxation liability.

On January 9, 2014, ODT notified Zhang that her business was not considered a conflict of interest and informed her that she could not use state time or resources on activities relating to this personal business. A review of Zhang's state email account found that on January 10, 2014 – the day after she was notified by ODT – Zhang began receiving, sending, and forwarding emails related to the business. Several of these emails, including those to the bank the business used for processing credit cards, the management and rental company associated with the business' location, and the business' insurance company, were sent directly to and from Zhang's state email account. Additionally, emails related to her business were forwarded to or from her personal and/or personal business email account. Zhang even created a folder in her state email inbox entitled "Store," where emails regarding the business were saved.

A forensic analysis was conducted by the Office of the Ohio Inspector General on the state-issued computer assigned to Zhang. The analysis identified numerous documents and pictures stored on the computer that appeared to be non-work related. Some of these documents were stored in a file directory within a folder entitled "Me," and a subfolder labeled with the name of Zhang's business. Within these folders, spreadsheets entitled "Expenses & Income," "Price Lists," and "Sales Journal" were located and identified as being related to the name of Zhang's business. Business cards and graphic design images created under Zhang's user name related to her business were also stored in the same location.

One image included a picture taken of Zhang's computer screen with a proposed graphic design for her business logo. The picture of Zhang's computer screen also showed the Windows task bar at the bottom of the screen. At least one of the files active on the task bar contained an open file with the name of an ongoing audit assigned to Zhang. The analysis of Zhang's state email account did not find evidence that this computer screen image was attached to any emails involving her business. It is unknown if this image was shared with anyone outside of ODT, as the forensic analysis indicated the picture was taken via a smartphone and later saved to Zhang's state-issued computer.

Additionally, investigators identified a spreadsheet stored on Zhang's state-issued computer that appeared to be used for tracking the month-to-month sales and use tax filings for her business, as well as several competitors. Personal income tax filings for non-immediate family members were also identified on Zhang's state-issued computer.

Zhang's Internet history was also analyzed as part of the forensic analysis. The Internet history identified visits to numerous websites where Zhang could buy products for her personal business. The email analysis – and documents located by ODT during the search of Zhang's workspace – found order confirmations and receipts from several vendors indicating Zhang had potentially purchased these items during work hours.

The Internet history further showed Zhang accessed the Ohio Business Gateway (OBG) on five separate occasions. OBG is an electronic system which businesses use for filing monthly sales and use tax returns. A recovered cached web page from July 24, 2014, showed OBG was accessed from Zhang's state-issued computer to view the sales tax return for her personal business.

Investigators were provided a copy of the business profile from the OBG account for Zhang's business. The business profile showed the mailing address for the business was Zhang's home address and the secondary contact phone number was her personal cell phone number. The person listed as the contact for the account was identified as a member of Zhang's family.

With the implementation of STARS in June 2014, the Ohio Department of Taxation created reports that track when employees access the system and what they accessed within the system. ODT generated a detailed report on Zhang's access that included the following information:

- The date and time stamp of when Zhang accessed a particular page within the system;
- The portal or page Zhang viewed; and
- The search criteria Zhang used to locate a particular taxpayer's account.

ODT also provided a list of audits Zhang was assigned to during the same time period. A comparison was made between the report of Zhang's taxpayer account accesses and the list of Zhang's assigned audits, and any entities not on Zhang's assigned audit list were reported back to ODT to determine whether Zhang had a legitimate business reason for reviewing these accounts.

The comparison showed Zhang accessed tax information for six direct competitors of her personal business on 34 separate occasions and accessed her personal business's account on six separate occasions. Additionally, Zhang viewed information on four businesses that were not on her approved ODT audit list. Based on the date and time stamps, investigators estimated Zhang had accessed these accounts for more than 230 minutes, or approximately four hours, between June 24, 2014, and September 9, 2014.

ODT further provided documents giving an overview of the STARS system and the type of information that is available in each portal or page. Based on the report provided by ODT, investigators were able to determine Zhang would have had access to the following information based on her page views:

- Federal Employer Identification Number (FEIN) or Social Security number (if the owner of the business does not utilize an FEIN);
- Phone numbers and addresses;
- Filing type and frequency;
- Tax bills and assessments;
- Tax forms and payments for a particular tax period;
- Tax, penalty, and interest breakdowns; and

- Sales and revenue information used by the business to determine its sales and use tax.

As noted above, the forensic analysis of Zhang's state-issued computer identified a spreadsheet created under Zhang's user name that details the sales, revenue and tax payments made by entities who were competitors to Zhang's personal business.

On November 3, 2014, the Office of the Ohio Inspector General separately interviewed Executive Administrator Gregory Siegfried of the ODT Tax Analysis and Legislative Division, and ODT Human Capital Management Manager Theresa Slaminko. Siegfried and Slaminko had examined and approved Zhang's conflict of interest review. Investigators asked both individuals whether or not it would have changed their decision on the approval of the request if Zhang would have informed them that a family member would be preparing the taxes for the business. Siegfried and Slaminko stated it would not have changed their decision, but noted that Zhang would not be allowed to consult or offer advice on the preparation of the taxes as that would have been a violation of the policy.

When asked if Zhang would have been permitted to receive certain financial documents as an investor in the business, Siegfried and Slaminko agreed that would have been permissible as long as she neither offered advice nor was consulted on the preparation of taxes. When Siegfried and Slaminko were asked about the possibility of Zhang creating templates of accounting records for the business to use and whether or not that was a violation of the ODT policy, both stated they would have cautioned Zhang against it, and might have asked for an additional legal review before approving her request.

During the interviews, both Siegfried and Slaminko emphasized several times that the policy prohibited Zhang from consulting, advising, or preparing the accounting records or taxes for the personal business. Additionally, they stated that use of any state resources in furtherance of the personal business was prohibited, and that this directive is noted in numerous ODT policies and procedures to which employees have access.

On February 2, 2015, the Office of the Ohio Inspector General interviewed Zhang regarding the findings of the investigation. Zhang was shown the items identified during the forensic analysis of the state computer assigned to her. Zhang admitted to using state resources related to her business, but stated she did so only during breaks and lunch hours. Zhang stated she did so because it was convenient, and if she received an email related to the personal business, she would respond.

In regard to the personal business documents, Zhang stated she would receive the documents for review. When investigators informed Zhang that the data on the personal business documents indicated they were created under Zhang's user name on her state-issued computer, Zhang stated she created the template for the documents. Investigators also informed Zhang that tax documents related to her personal business and personal income tax forms for her fiancée were located on her state-issued computer. Zhang was asked if she had prepared or consulted on the taxes. At first, Zhang denied preparing the taxes for her personal business and fiancée, but later admitted that she had prepared the taxes. When asked if she was aware that ODT defined immediate family member as "... a spouse of an employee on a joint tax return, or employee's minor child or legal ward," Zhang indicated she was not aware of that and defined immediate family as including parents.

Finally, investigators asked Zhang whether or not she accessed tax records for businesses identified as being direct competitors of her own personal business. Zhang admitted to doing so in order to create audit leads. Zhang explained that shortly after her business opened, an unnamed individual approached her in the store and informed her that another similar business was not paying sales tax. Based on this information, Zhang decided to conduct her own research into the matter. Zhang could not name the individual and stated the person was not aware she was a tax auditor with the Ohio Department of Taxation. When investigators asked how this individual would know about the non-payment of taxes by a business, and why the individual would be telling her this information, Zhang stated she did not know. Investigators asked why she did not inform her supervisor of the allegation, and Zhang stated she had talked about it to her supervisor, Grant Smith.

Investigators asked Zhang why she was accessing the accounts over several months and if it typically took that long to create an audit lead. Zhang stated she did not know. At the end of the interview Zhang insisted she was only looking at the accounts to create future audit leads and stated, "... I guess that ... may ... or it could benefit me if ... ." When investigators asked Zhang how it would not benefit her personal business, she did not answer. Investigators noted that an audit is a very time consuming and expensive process for a business. They asked Zhang if the store being audited should close during the audit, and Zhang's business was still open, would consumers then shop at Zhang's business instead. Zhang said, "I guess I didn't think clearly through it at the time."

On February 12, 2015, the Office of the Ohio Inspector General interviewed Zhang's supervisor, Grant Smith, and Executive Administrator of the ODT Audit Division Joe Hammond, about the audit lead process.<sup>5</sup> Both stated once an auditor has determined a specific business to research, the process should generally require a maximum of a few hours to complete. Auditors would access STARS to obtain a summary of the revenue and tax payments made by the business and would present the information as part of the audit request. Very rarely would an auditor be researching a business over a multiple-month time period as this would only occur when a business has been opened less than three years, as the typical audit covers a three-year time period. During the interview it was also noted that auditors generally research a single business, and not an industry or several similar businesses at the same time.

Hammond stated that during the time period under investigation, Zhang was assigned to audit the tax reports and filings of taxpayers engaged in bankruptcy proceedings. As such, Zhang would be assigned particular audits instead of creating her own leads. While nothing prohibited her from creating audit leads, Zhang would not have been expected to do so during this time.

Smith was asked about Zhang's assertion that she informed him of the audit research she was conducting. Smith stated the first time he was made aware of the issue was when he was called to attend a meeting with administrators in the human resources division and informed Zhang was

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<sup>5</sup> According to an earlier interview with Hammond regarding background information related to the investigation, the audit lead process has changed to where auditors will be given audit assignments instead of creating their own.

being placed on administrative leave. Smith stated he was aware Zhang owned a personal business, but was not aware of her activities in STARS or that she was utilizing state resources in furtherance of the business.

#### *Other Matters*

During the review of Zhang's communications with the human resources division asking whether her personal business activities would present a conflict of interest, the Office of the Ohio Inspector General noted Zhang's supervisor at the time was not included in any of the emails. The ODT policy states, in section 5.3 *Conflict of Interest Review Process*:

- 5.3.2. Employees are to initiate the conflict of interest review process by contacting their supervisor to complete a request for conflict of interest review form for submission to the supervisor.
- 5.3.3. Supervisors must forward the completed and signed conflict of interest review form to the Tax Commissioner's Office.

In the interview conducted by the Office of the Ohio Inspector General on November 3, 2014, Slaminko stated she receives the conflict of interest review form through the automated routing process. On occasion, the form would come from an employee's supervisor, but the majority of time, it is sent directly by the employee. When asked if the supervisor is informed of the decision or the potential conflict of interest, Slaminko said supervisors are occasionally notified, but not all the time. Slaminko believed the reason supervisors are not notified is that the activities involved in a conflict of interest review are related to the employee's personal situation and not related to their job duties.

Additionally, the conflict of interest policy states, "... 'employees' outside activities are subject to review at any time for a conflict of interest at the discretion of the Tax Commissioner or his/her designee." When asked if these reviews occur, Slaminko said that ODT does not initiate reviews. However, employees are encouraged to submit revised forms if there are changes in their outside activities to ensure that these changes would not pose a conflict of interest. Employees do not have to submit a new form if their job duties within ODT have changed.

## **CONCLUSION**

The Office of the Ohio Inspector General conducted an investigation into allegations made by the Ohio Department of Taxation regarding former tax auditor agent 3, Lu Zhang. ODT alleged Zhang accessed taxpayer information on businesses that may have been in direct competition with Zhang's personal business. ODT also alleged Zhang used state resources in furtherance of her personal business.

The investigation determined Zhang had accessed tax information on businesses that were in direct competition with her own. Zhang stated she had done so because an unnamed individual informed her shortly after Zhang opened her own business that other similar businesses were not paying the appropriate sales tax to the state. Zhang said the individual did not know she was an ODT auditor and that she did not know how the individual knew about the non-payment of taxes by other businesses. As a result, Zhang conducted her own research into the matter and planned on using this information as an audit lead with another ODT employee conducting the audit.

While auditors in the past were permitted to pursue their own audit leads and, therefore, to conduct research on taxpayers, including accessing tax information within STARS, this process would only have taken several hours according to the executive administrator of the division and Zhang's supervisor. However, the STARS search records show Zhang accessed the taxpayers' information on numerous occasions over a three-month period. Additionally, Zhang was assigned to bankruptcy audits during this time and was not expected to be researching or presenting audit leads.

The investigation also identified Zhang using state resources in furtherance of her personal business. Less than 24 hours after having been notified she did not have a conflict of interest by opening a personal business and being reminded of the prohibition on using state resources, Zhang began receiving and sending emails from her state account regarding her personal business. Forensic analysis conducted on Zhang's state-issued computer and her Internet activity identified numerous documents related to her personal business. Also identified were copies of tax filings for non-immediate family members and those related to her personal business.

Zhang admitted to using state resources related to her personal business, stating that she did so as it was convenient. She also admitted to preparing tax returns for her personal business and fiancée in violation of the conflict of interest policy.

**Accordingly, the Office of the Ohio Inspector General finds reasonable cause to believe a wrongful act or omission occurred in these instances.**

During the course of the investigation, the Office of the Ohio Inspector General determined that ODT supervisors may not have been informed of employees' approved outside activities or requests for reviews of potential conflicts of interest. The reason given by ODT was that an employee's outside activities were personal, and not related to their job duties at ODT. The ODT conflict of interest policy states that the review starts with the supervisor and that supervisors are to forward these requests to the human resources division.

By not having the supervisor aware of an employee's potential conflict of interest, issues could arise, especially in the audit division, if a supervisor were to assign the employee work that would result in an actual conflict of interest.

The investigation found the Ohio Department of Taxation does not periodically review an employee's approved outside activities to ensure changes have not occurred that would lead to the development of a conflict of interest. The agency policy states outside activities are subject to review but ODT does not have a proactive procedure in place to ensure compliance with the policy. Employees are encouraged to notify the human resources division when their reported outside activity has changed, allowing the opportunity to reevaluate the potential for conflict of interest. However, the human resources division is not informed when an employee's assigned job duties are changed, and a new conflict of interest review might be needed.

**Accordingly, the Office of the Ohio Inspector General finds reasonable cause to believe a wrongful act or omission occurred in these instances.**

## **RECOMMENDATION(S)**

The Office of the Ohio Inspector General makes the following recommendations and asks the tax commissioner of the Ohio Department of Taxation to respond within 60 days with a plan detailing how the recommendations will be implemented. The Ohio Department of Taxation should:

- 1) Review the Confidential Personal Information policy with the audit division to ensure employees are aware of the prohibitions on accessing data outside of their official job duties.
- 2) Require that supervisors be advised of any conflict of interest reviews made by their employees and the outcome of the review.
- 3) Establish a process for random reviews of approved conflict of interest documentation to ensure employees are following the appropriate policies and procedures and that no changes have occurred where a conflict of interest would now exist.
- 4) Establish a policy that if changes to the employee's job duties within ODT occurs, that a new review of their approved outside activity occurs to ensure a conflict of interest would not exist.
- 5) Audit the tax filings prepared by Zhang for the limited liability company where she has an ownership interest, to ensure all preparations were in compliance with law.

## **REFERRALS**

This report of investigation will be provided to the Franklin County Prosecuting Attorney, the Columbus City Attorney, and the Accountancy Board of Ohio for consideration.



STATE OF OHIO  
**OFFICE OF THE INSPECTOR GENERAL**

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RANDALL J. MEYER, INSPECTOR GENERAL

**NAME OF REPORT: Ohio Department of Taxation**

**FILE ID #: 2014-CA00065**

**KEEPER OF RECORDS CERTIFICATION**

**This is a true and correct copy of the report which is required to be prepared by the Office of the Ohio Inspector General pursuant to Section 121.42 of the Ohio Revised Code.**

**Jill Jones**  
**KEEPER OF RECORDS**

**CERTIFIED**  
**August 12, 2015**

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