



Audit Department

500 S Grand Central Pkwy Ste 5006 • PO Box 551120 • Las Vegas NV 89155-1120
(702) 455-3269 • Fax (702) 455-3893

Angela M. Darragh, CPA, CFE, CISA, Director



May 27, 2014

Mr. Don Burnette
Clark County Manager
500 South Grand Central Parkway, 6th Floor
Las Vegas, Nevada 89106

Dear Mr. Burnette:

We recently completed an audit of the Las Vegas Justice Court- Traffic Division's internal controls over cash handling. The audit was conducted at the request of the Justice Court Administrator due to a suspected theft. Our procedures examined internal controls in place through the last day of fieldwork, February 21, 2014. Our samples were selected from transactions during the period from January 1, 2012 to December 31, 2013. The objective of our audit was to determine whether adequate controls were in place over cash receipts and traffic citations to ensure assets were protected and funds received were properly appropriated and whether system user rights were appropriately assigned based on individual job functions.

To accomplish our objectives, we conducted a preliminary survey that included reviewing applicable policies and procedures, interviewing management staff, attending and observing traffic court sessions, attending and observing traffic attorney sessions and performing walkthrough observations of the various facets of the Las Vegas Justice Court- Traffic Division. After a risk assessment, we performed detailed transaction testing to further assist with meeting our objectives.

Internal controls over cash at the Las Vegas Justice Court - Traffic Division require strengthening. Manual and computer application controls are lacking in areas that leave cash transactions at risk. Safeguarding of funds could be improved. We believe management transaction monitoring and review is lax. Specifically, adjustments to funds owed to the Court, receipt voids, and system user rights are currently not being reviewed. We identified a potential misappropriation of \$91,502 in Court funds.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

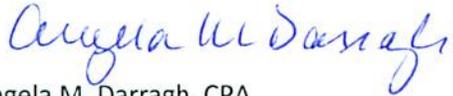
Las Vegas Justice Court Traffic Division

May 27, 2014

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A draft report was provided to the Court Administrator for comment and her response is included. We appreciate the cooperation and assistance provided by the Las Vegas Justice Court.

Sincerely,



Angela M. Darragh, CPA
Audit Director



AUDIT DEPARTMENT

Audit Report

Las Vegas Justice Court – Traffic Division Cash Controls

May 2014

Angela M. Darragh, CPA, CISA, CFE
Audit Director

AUDIT COMMITTEE:

Commissioner Steve Sisolak

Commissioner Chris Giunchigliani

Commissioner Lawrence Weekly

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BACKGROUND The Las Vegas Township Justice Court is a court of limited jurisdiction that presides over criminal, civil and traffic matters within the Las Vegas Township. The court currently has 14 elected Justices of the Peace serving 6-year terms. The Court's Traffic Division is responsible for traffic law violation citations issued by law enforcement agencies in the Las Vegas Township, and outside the City of Las Vegas, North Las Vegas or the City of Henderson. These law enforcement agencies include Nevada State Park Rangers, Nevada Highway Patrol, Las Vegas Metropolitan Police Department, UNLV Police Department, Las Vegas Constable's Office, State of Nevada Taxicab Authority, Union Pacific Railroad Police Department, Clark County School District and Clark County Park Rangers.

The Las Vegas Justice Court has the highest traffic caseload in the State of Nevada, with approximately 57 percent of the statewide total. In the most recent fiscal year ended June 30, 2013, 202,940 traffic and parking cases were filed while 198,186 were disposed. The Las Vegas Justice Court employs 1.05 FTE quasi-judicial positions in the form of traffic referees to assist with traffic cases.

Payments are processed in person at the Traffic Division Customer Service Office located on the first floor of the Regional Justice Center. The Traffic Division has 13 dedicated windows to handle transactions. In addition, payments are also accepted by telephone, mail and internet. The Las Vegas Justice Court - Traffic Division offers weekly attorney sessions and a dedicated courtroom for walk-in court sessions. On rare occasions, payments are processed in the courtrooms.

Total revenue reported by the Las Vegas Justice Court for the most recent fiscal year ended June 30, 2013, totaled approximately \$49M; of this amount, \$37.5M was generated by Traffic. Due to the amount of funds received by the Las Vegas Justice Court- Traffic Division, cash controls are of significant importance.

OBJECTIVES, SCOPE, AND METHODOLOGY The Clark County Audit Department was asked to conduct this audit due to a suspected theft.

The objective of this audit is determine whether:

- Adequate controls were in place over cash receipts and traffic citations to ensure assets are protected and funds received were properly appropriated.
- Case management system user rights are adequately assigned based on individual job functions.
- Identify amounts lost due to theft or fraud.

To accomplish our objectives, we conducted a preliminary survey that included reviewing applicable policies and procedures, interviewing management staff, attending and observing traffic court sessions, attending and observing traffic attorney sessions and performing walkthrough observations of the various facets of the Las Vegas Justice Court- Traffic Division.

Based on the risks noted during our preliminary survey, we developed an audit program. We judgmentally sampled 12 deposits to ensure funds were appropriately collected, reconciled, deposited and recorded. We reviewed all voided receipts from 2012 and 2013 to determine soundness, documentation and approval. We judgmentally sampled 650 adjustments to amounts owed to the Court to ensure proper documentation, reasonableness and justification. We reviewed all documented monetary overages/shortages for 2013 to determine the level of management review as well as any recurring or unusual patterns. We also judgmentally sampled 12 deleted traffic cases to determine reasonableness and justification. We reviewed all personnel who had elevated system access to determine if rights were reasonably assigned based on job function and we reviewed inactive employees to determine if system access was deactivated.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

RESULTS IN BRIEF Internal controls over cash at the Las Vegas Justice Court - Traffic Division require strengthening. Manual and computer application controls are lacking in areas that leave cash transactions at risk. Safeguarding of funds could be improved. We believe management transaction monitoring and review is lax. Specifically, adjustments to funds owed to the Court, receipt voids, and system user rights are currently not being reviewed. We identified a possible misappropriation of \$91,502 in Court funds.

Each finding includes a ranking of risk based on the risk assessment that takes into consideration the circumstances of the current condition including compensating controls and the potential impact on reputation and customer confidence, safety and health, finances, productivity, and the possibility of fines or legal penalties.

DETAILED RESULTS

Significant Number of Transaction Voids (HIGH) 1,755 processed transactions in the Traffic Division were voided in 2012 and 2013. During our testing, we found three employees had void authorization in the case management system that was not warranted based on their job function. Employee #1 processed 168 voids, employee #2 processed 16 voids, and employee #3 processed 2 voids. Processed transactions should only be voided by a designated employee who the Court considers to be a lead clerk, office supervisor, or staff from the Court's Finance Division, to ensure that the void is reasonable and necessary.

We found a total of 282 transactions which were voided with no reason noted in the comment field dialog box within the case management system. Because no comment was listed, we could not validate the void.

We also found 151 transactions where a user (Employee #1 from above) accepted a cash payment, voided the cash transaction by close of business, and then adjusted down the balance owed to the Court by the amount voided. In these instances, the voids did not appear warranted or legitimate. We believe it is likely the cash in these cases was stolen by the employee. We found 184 transactions where a user (Employee #1 from above) accepted a cash payment, but unlike the previous paragraph, had other properly authorized employees void the transaction and then adjusted down the balance owed to the court by the amount voided. In these instances, the voids did not

appear warranted or legitimate. We believe it is likely the cash in these cases was stolen by the employee.

We found that the suspected theft of cash occurred from February 2012 to December 2013. Total cash unaccounted for is \$91,502.

User access within the case management system is currently not being monitored by management of the Las Vegas Justice Court. As such, when employee gained system access to perform transaction voids, management was unaware. In addition, employee oversight as it pertains to monitoring of transactions is lax, thus allowing the employee who committed the apparent theft to go undetected from February 2012 to December 2013.

Cash is a very liquid asset that can be easily misused or misplaced without proper detection if adequate procedures and controls are not followed or in place. Routinely reviewing voided transactions makes it more difficult for clerks to accept a customer's payment, issue a receipt, and then later void and/or cancel the transaction and pocket the cash.

Recommendation

1. Require staff to fully document reasons for voided transactions.
2. Review a report of all voids on a regular basis.
3. Periodically review void access rights.
4. Submit a loss claim to Clark County Risk Management to recoup the funds.
5. Correct void access for employees identified as incorrectly having the ability to perform that function.

Transaction Monitoring and Review Not Regularly Performed (MEDIUM)

We found that the Traffic Division does not, as a policy, routinely review adjustments to funds owed to the Court. In addition, no review process was in place for deleted citations or closed or deleted cases. Lastly, one large clerk overage for \$145 was not reviewed by management.

All traffic division clerks have access within the case management system to adjust balances owed to the Court on traffic cases. Access is granted so that clerks can dismiss certain traffic charges where a defendant provides proof of compliance.

Without a formal review process in place, unauthorized or unwarranted adjustments to balances owed to the Court may go undetected. In addition, deletion of cases and citations should be reviewed to ensure the deletion was done in accordance with Court policies and/or judge's order. By not having a formal review process in place for deleted cases, fraud or theft may go undetected. Lastly, all clerk overages/shortages should be reviewed and investigated to ensure misappropriation did not occur.

Recommendation

1. Have an independent source periodically review adjustments to balances owed to the Court for reasonableness and justification.
2. Periodically review deleted citations and closed or deleted cases.
3. Perform due diligence on all material monetary overages/shortages to determine the reason. Log and document any corrective action.

Users Granted Inappropriate Rights within the Case Management System (MEDIUM)

Based on the testing performed during this audit engagement, eight users were found to have elevated system access as Lead Clerks. These users should not have access based on their job function. A user with Lead Clerk rights is considered a power user who is able to receipt cash, void receipts and adjust defendant balances without any additional authorization, thus making it easier to perform and conceal a theft.

We also found three former employees had system access even though they were no longer employed by Clark County. This reduces accountability if the account is used to perform transactions due to a compromised password.

User access should be carefully assigned as to avoid unauthorized

access based on job functions.

Recommendation

1. Periodically review and monitor existing user access to help reduce or prevent unauthorized access within the case management system.
2. Retain documentation noting justification whenever a user is granted elevated system access.
3. Correct access for the individuals identified above.
4. Implement a process to immediately remove access for terminated employees.

Need for Updated Daily Operation Policies and Procedures (MEDIUM)

Policies and procedures have been established, but we believe they could be enhanced. The current policies and procedures could be improved with regards to individual responsibilities, segregation of duties, adjustments to amounts owed to the Court and case documentation. Policies and procedures are essential for all financial operations, as they provide guidelines for good internal controls, ensure consistency in operations, provide a resource for new and current employees, and help to minimize the risk of loss of funds and theft of Court assets. Written policies and procedures should be detailed enough for an individual not associated with Court functions to be able to fully understand daily operations.

Recommendation

1. Prepare and distribute updated policies and procedures to employees within the Traffic Division.
2. Maintain an acknowledgement form from staff, indicating that they have read, understood, and will comply with the established policies and procedures.

Weaknesses in Cash Control and Asset Safeguarding (MEDIUM)

We identified the following weaknesses in cash controls

- Finance staff, the Office Supervisor, and all lead clerks share the same safe access code. This safe contains the funds collected from each window at the end of the day. Without

individual safe access codes, the ability to hold individual employees accountable should funds be stolen is jeopardized.

- We found that morning cash banks for each clerk were not inside the Traffic safe, but rather on a desk inside the Office Supervisor's office accessible to any employee inside the Traffic Division customer service center. We observed periods where cash had no supervision. Without adequate supervision and safeguarding, morning cash banks and daily deposits are more susceptible to theft.
- Although secured lockers are available, clerks are allowed to keep large personal items such as purses and backpacks in the cash window areas. Having the means to conceal funds in a backpack or purse increases the risk of theft.
- Clerks can make change at any time with each other throughout the day. There appears to be no policy regarding change. A change fund is in place in the finance office. However, the office is located on another level within the Regional Justice Center, making it inconvenient to use for change. When employees are able to make change amongst themselves, there is a loss of accountability for overages and shortages.
- Currently, Clerks are able to view their register till total in the case management system, thereby knowing the total funds in their drawer before they begin their count at the end of the shift. This creates a risk of theft since the Clerk knows how much cash must be turned in.
- Once a clerk balances and closes their till, funds are placed in a locked safe deposit bag and given to a lead clerk, who then deposits the bag in a safe. Neither person attests to the transfer or amount of transfer. Good cash controls require that whenever custody of cash is transferred from one individual to the next, both individuals should separately verify and attest to this verification by signature.
- Closing shifts are staggered by 15-30 minutes. Because of

this, clerks balance and close their tills and then give their daily deposit bank bags to the closing lead clerk, who then ultimately places each bank deposit bag in the safe. Keys to each bank deposit bag are kept on or near the assigned Clerk window overnight. This arrangement allows clerks who stay later to have access to end of day funds.

- Register keys are sometimes left nearby while a Clerk steps away from their window. When an employee steps away from their window, their register should be locked and corresponding key should be taken by the employee. Backup keys should be kept in a secured location. Keys left near a cash register make it easier for funds to be stolen.
- Although the Traffic Division Customer Service Center deals with a high volume of cash, surveillance cameras are not utilized. We believe the addition of surveillance cameras would deter theft and provide a mechanism to investigate losses in the case of a suspected theft.
- Funds awaiting bank deposit are left in an unsecured location within the Court's Finance Division. The sealed clear plastic deposit bag is left in the bottom unlocked drawer of the Assistant Office Specialist's desk. If the Assistant Office Specialist is not at his/her desk upon arrival, the Loomis armored transport attendant knows to take the deposit out of the unlocked bottom drawer and sign the log book signifying pickup of the funds. This reduces accountability for the funds.

Recommendation

1. Use one safe with a drop slot opening to drop funds at the end of the day. Only Finance should have access to open the safe to remove the dropped funds.
2. Use a separate safe for window cash banks. Assign each employee that accesses the cash banks a separate identifiable access code.
3. Restrict personal items such as purses and backpacks from the counter areas.

4. Develop a new procedure for making change at the windows. Require that all change be made under supervision.
5. Remove the “View Till” option from Clerk access to ensure blind counts at the end of a shift.
6. Require that a second party perform a count of funds before funds are turned in to the end of day Lead Clerk.
7. Keep register and bank deposit bag keys in a secured location overnight and require they be signed out by the Clerk in the morning to limit access to the drop bags before they are put in the safe.
8. Require clerks to take their register keys with them when they step away from their window. Keep a set of spare keys separately secured in the event that an employee does not return from a break and the drawer needs to be accessed.
9. Install security cameras where cash transactions and cash counts are likely to occur.
10. Secure daily deposit funds, possibly in a safe, before pickup by Loomis. Require that all transfers of cash be done under the supervision of Court Finance staff.

**No Control over
Adjustments Made at the
Customer Service Window
(MEDIUM)**

Certain traffic citations are dismissible upon the defendant showing proof of compliance. For these citations, the Las Vegas Justice Court – Traffic Division allows defendants to present evidence to a clerk at the Traffic Division Customer Service Center. Clerks review the evidence, notate any pertinent information in the case management system, adjust the balance due, and dispose of the case. There are no current provisions for the retention of the evidence shown by the defendant. The lack of documentation increases the risk that inappropriate adjustments would not be identified.

Recommendation

1. Require any evidence, provided to a Clerk be scanned in to the case management system.

2. Develop and implement a periodic review process for adjustments and case disposals done at the Traffic windows.

Deposit Reconciliation Not Performed Timely (MEDIUM)

The monthly reconciliation between the deposits to the bank and deposits recorded in SAP (the County's enterprise resource software used to manage all aspects of County operations) are not completed in a timely manner. The most recent reconciliation at the time of fieldwork in December 2013 was for the August 2013 activity. Although daily reconciliations appear to be done timely, monthly reconciliations should also be timely. Untimely bank reconciliations increase the risk that discovery of any discrepancies in revenue collection, bank errors, or misappropriation are not identified quickly. Bank reconciliations are now up to date as of February 2014.

We also found that certain hard copy original count documents from the Traffic Division area are only being kept for two weeks and are then discarded. This includes original Till Balance and Transaction Reports as well as calculator tapes from each drawer. Although reprints are able to be generated, original till end of day reports may contain pertinent notes from the preparer and contain signature attestation to balancing.

Recommendation

1. Ensure that monthly reconciliation procedures are being performed by the end of the following month.
2. Retain original end of day Till Balance and Transaction Reports as well as calculator tapes in accordance with record retention schedules.

No Minimum Password Requirements in Odyssey Password (MEDIUM)

The Odyssey application does not have limitations or parameters regarding how passwords are created. In addition, Odyssey does not require that passwords be changed periodically. Clark County Technology Directive 1, Section (IV)(C)(2)(a)(1) requires that passwords be at least eight characters in length and consist of two or more of the following: capital letters, lower case letters, numbers, and special characters (%*\$@!). User passwords should not be common names or phrases. Also, user passwords must be changed every 90 days and not be reused for at least six password change periods.

A password that is not required to contain certain features, such as length or character type and is not changed periodically is more susceptible to be compromise and reduces employee accountability for actions taken with that account.

Recommendation

1. Develop a password policy for the Odyssey system. The policy should include requirements on the length and characters used to create a password.
2. Turn the Odyssey change password feature on and set it according to County password policy.



LAS VEGAS JUSTICE COURT
REGIONAL JUSTICE CENTER
200 LEWIS AVENUE
LAS VEGAS, NEVADA 89155

LADEANA GAMBLE
COURT ADMINISTRATOR

(702) 671-3100
FAX: (702) 671-2512

TO: Angela M. Darragh, CPA, CISA, CFE
FROM: LaDeana Gamble, Court Administrator *LDG*
SUBJECT: Management Response & Action Plan for Traffic Division Audit
DATE: May 22, 2014

In 2005, Las Vegas Justice Court consolidated its administration, including human resources, finance, security, and court operations with the Eighth Judicial District Court and became what was then known as Clark County Courts. The finance manager for Las Vegas Justice Court was a direct report to the prior court executive officers. In 2007, Las Vegas Justice Court completed a Revenue Collections Audit and the response to the findings was submitted to Internal Audit on April 17, 2007; however, the recommendations were not implemented.

In August 2012, Las Vegas Justice Court deconsolidated from Clark County Courts. At Chief Judge Bennett-Haron's directive, Las Vegas Justice Court has requested Internal Audit to review financial standards in all divisions to document financial and operational deficiencies. We are aware that the findings will result in the need for the Court to re-engineer our Finance Division in order to better manage the Court's fiscal resources.

I would like to personally thank you for the assistance of your outstanding audit team. Their insight into the challenges of our Traffic Division highlights the importance of follow through regarding prior recommendations and adherence to the Supreme Court of Nevada, Administrative Office of the Courts, Minimum Accounting Standards Checklist. We look forward to the audits of our remaining divisions.

The responses below include established timelines to address the current audit.

1. Significant Number of Transaction Voids

Management Response & Action Plan:

- On 3/25/14, Las Vegas Justice Court submitted a loss claim to Clark County Risk Management to recoup the stolen funds (Recommendation 4 - Status Completed).
- All voids transactions require approval by the Traffic Supervisor or Traffic Lead (authorized void approvers). The reason for the void is reviewed by the approver and is noted in the case management system. No single user of the Odyssey Case

Management System (CMS) is permitted to void a transaction without approval from another authorized approver of void transactions. The void initiator, approver and void reasons are fully documented in the CMS (Recommendations 1, 5 - Status Completed).

- *The Finance Division will independently review all void transactions for completeness on a daily basis. This activity will also include any subsequent transactions associated with the void such as adjustments, payments etc. (Recommendation 2 - Status Completed).*
- *Each Division Administrator will audit CMS rights and roles configuration for each employee which accesses the CMS on a quarterly basis. Any permission modifications will be submitted to the LVJC IT department for implementation. Once completed, the Division Administrator will confirm the changes and provide written sign-off (Recommendation 3 - Under Development).*

2. Transaction Monitoring and Review Not Regularly Performed

Management Response & Action Plan:

- *All shortages/overages will be investigated by the Finance Division and a documentation log will be maintained noting corrective action(s) (Recommendation 3).*
- *The Finance Division will develop a LVJC shortage/overage report that will be provided to the Comptroller monthly (Recommendation 3).*
- *The Finance Division will conduct monthly reviews deleted cases for appropriateness (Recommendation 2).*
- *LVJC IT will develop a report which sends the Finance Division all deleted or closed cases with an outstanding financial balance. The Finance Division will review these cases for appropriateness (Recommendation 2 - In Development).*
- *LVJC IT will develop a custom report for the Finance Division specifically to audit financial adjustments to balances for reasonableness (Recommendation 1 - In Progress).*

3. Users Granted Inappropriate Rights within the Case Management System

Management Response & Action Plan:

- *The Information Technology Division of the Las Vegas Justice Court is in the process of updating the user rights and roles for all employees. This project is a priority and should be completed by November 1, 2014. Upon completion of this project, the Odyssey case management system will maintain a user rights and roles listing that can only be updated by the respective Division Administrator's recommendation to Court Administration. This formal process will require the Division Administrator to state the employees need for a specific access to complete their job function (Recommendation 2, 3 - In Progress).*
- *The Employee Exit process now requires the completion of an Employee Exit form. This form contains instructions for IT to disable access to all information systems (Recommendation 4 - Completed).*
- *Each Division Administrator will audit CMS rights and roles configuration for each employee which accesses the CMS on a quarterly basis. Any permission modifications will be submitted to the LVJC IT Division for implementation. Once completed, the Division Administrator will confirm the changes and provide written sign-off (Recommendation 1 - Under Development).*

4. Need for Updated Daily Operation Policies and Procedures

Management Response & Action Plan:

- *The Finance and Traffic Divisions will update their respective policies and procedures manual by December 31, 2014. Each Finance and Traffic Division employee will be trained on their respective updated policies and procedures manual and will sign an acknowledgement form that reflects their receipt of the manual and training on the updated policies and procedures.*

5. Weaknesses in Cash Control and Asset Safeguarding

Management Response & Action Plan:

- *The Traffic Division is exploring the purchase of a safe that will allow the supervisor, leads and the Finance Division to have different access codes. This exploration will be completed by August 1, 2014.*
- *Employees have been informed that purses and backpacks are not allowed at their customer service work stations. Employees have been provided a locker to store their belongings.*
- *Employees have been directed that change can only be made by the supervisor or lead. The new procedure that states the aforementioned requires all employees to sign an acknowledgement stating that change can only be made by a supervisor or lead.*
- *The case management system does not allow the removal of the "View Till" option unless Las Vegas Justice Court invests in a modification to the CMS system. The Finance Division is working with LVJC IT to develop an alternative process where the employee does not reconcile the till but simply closes the till. The Finance Division would do the reconciliation process and "view till" option would not be available to the clerk. (Option 5 - In Progress).*
- *Each employee now has a second count of their funds by the supervisor or lead by the end of each work day.*
- *The register and bank deposit keys will be secured overnight in the safe located in the Traffic Supervisor's office.*
- *The Traffic Division will enforce the current procedure that requires all employees to take their register key with them when they are away from their window. The Traffic Division will obtain spare keys by June 1, 2014 in the event an employee does not return from a break and the drawer needs to be accessed.*
- *The Board of County Commissioners approved funding for a traffic remodel. In the proposed remodel, the Traffic Division has requested that security cameras be installed at all customer service work stations and within the Traffic Division.*
- *Effective immediately all deposit funds are secured in a safe, before pickup by Loomis and deposit funds will be provided to Loomis by the financial office specialist.*

6. No Control Over Adjustment Made at the Customer Service Window

Management Response & Action Plan:

- *Implement a scanning solution for each customer service counter station to provide the ability to scan documents and identification cards into the Odyssey CMS (Recommendation 1 - In Progress).*
- *Notify attorneys proof will be required to modify any dismissible charge. Proof will be attached to the scanned court entry in the Odyssey CMS (Recommendation 1 - In Progress).*

- *The Traffic Division Supervisor will work with LVJC IT to develop a custom report to be used by the Finance Division for reviewing adjustments and case disposals completed at the Traffic Customer Service counters (Recommendation 1 - In Progress).*

7. Deposit Reconciliation Not Performed Timely

Management Response & Action Plan:

- *Monthly reconciliation reports will be completed by the end of the following month.*
- *The Finance Division will retain the original end of the day Till Balance and Transaction Reports as well as calculator tapes.*

8. No Minimum Password Requirements in Odyssey Password

Management Response & Action Plan

- *By June 1, 2014, Las Vegas Justice Court will require Odyssey users to reset their passwords and subsequently every three months thereafter (Recommendation 2).*
- *By November 1, 2014, Las Vegas Justice Court will work with Tyler Technologies to reconfigure Odyssey authentication to utilize Active Directory. This will ensure Odyssey user accounts and passwords are in accordance with the County password policy (Recommendations 1, 2).*

C: Chief Judge Karen Bennett Haron
Vice Chief Judge Joe Bonaventure