



**Lehigh County**  
Pennsylvania

**OFFICE OF THE CONTROLLER**

Mark Pinsley, MBA

COUNTY CONTROLLER

Nanton John, CFE

DEPUTY CONTROLLER

March 27, 2024

Steven Mendel, Managing Member  
Allentown Park Hotel  
7471 Keebler Way  
Allentown, PA 18106

Timothy Reeves, Chief Fiscal Officer  
Lehigh County Government Center  
17 South Seventh Street  
Allentown, PA 18101-2400

**RE: Allentown Park Hotel**

To Mr. Mendel and Mr. Reeves:

We have recently completed an agreed-upon procedures engagement of hotel room rental tax remitted by the Allentown Park Hotel for the period January 1 to December 31, 2022. Our report number 24-12 is attached.

The corresponding Hotel Tax "Determination from Mr. Reeves requesting payment of \$3,741.11 is also attached.

A handwritten signature in black ink that reads "Mark Pinsley".

Mark Pinsley  
County Controller

Attachment

xc: Benjamin Schwarcz, CPA

HOTEL TAX/ALLENTOWN PARK HOTEL



**COUNTY OF LEHIGH, PENNSYLVANIA**  
**HOTEL ROOM RENTAL TAX REMITTANCES**  
**ALLENTOWN PARK HOTEL**

*Independent Controller's Office Report on  
Applying Agreed-Upon Procedures  
For the Period January 1, 2022 to December 31, 2022*

COUNTY OF LEHIGH, PENNSYLVANIA  
HOTEL ROOM RENTAL TAX REMITTANCES  
ALLENTOWN PARK HOTEL

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Allentown, PA 18106

Timothy Reeves, Chief Fiscal Officer  
Lehigh County Government Center  
17 South Seventh Street  
Allentown, PA 18101-2400

**RE: Allentown Park Hotel**

To the Management of the Allentown Park Hotel  
and the Chief Fiscal Officer:

Pursuant to Act 12 of 2005, section 1770.8 to the County Code, Lehigh County Ordinance #2005-180 and the Lehigh County Hotel Room Rental Tax Rules and Regulations effective September 4, 2005, a four percent hotel room rental tax shall be collected and remitted to the Lehigh County fiscal officer.

We have performed certain procedures enumerated below, which were agreed to by the Lehigh County fiscal officer, solely to assist the county fiscal officer in determining the accuracy of hotel room rental tax remittances made by the Allentown Park Hotel management for the period January 1, 2022 to December 31, 2022. The Chief Fiscal Officer, as the delegate for the County Executive, is responsible for the collection of the hotel room rental tax. Hotel operators are responsible for the supporting documentation to which these procedures were applied. The sufficiency of these procedures is solely the responsibility of the parties specified in this report who have acknowledged that the procedures performed are appropriate to meet the intended purpose of the engagement. Consequently, we make no representation regarding the sufficiency of the procedures enumerated below either for the purpose for which this report has been requested or for any other purpose.

The procedures performed may not address all the items of interest to a user of this report and may not meet the needs of all users of the report and, as such, users are responsible for determining whether procedures performed are appropriate for their purposes. An agreed-upon procedures engagement involves the practitioner performing specific procedures that the engaging party has agreed to and acknowledged to be appropriate for the intended purpose of the engagement and reporting on findings based on the procedures performed.

**Procedures and Findings:**

1. **Procedure:** Verification of reported revenue to Form PA-3 submitted to the Commonwealth of Pennsylvania, Department of Revenue.  
**Finding:** Reported revenue was verified to form PA-3 for the period of February 24 through December 31, 2022. Revenue was not verified to form PA-3 for the period of January 1 through February 23, 2022 as requested forms and supporting documents were not provided for this period. Hotel ownership changed hands February 24, 2022.



- Procedure:** Compliance to the County of Lehigh Rules and Regulations for hotel room rental tax collection. (Per the Chief Fiscal Officer, underpayment of hotel tax less than \$100, as determined during the audit, is considered immaterial and will not be collected from the hotel operator).

**Finding #1:** Reported taxable revenues of \$1,257,259.65 resulted in \$50,290.39 in hotel tax payable and remitted to the County of Lehigh during the period under review (before adjustments). Tax in the amount of \$50,356.93 was remitted to the County, as hotels shall remit the higher of actual tax due or the actual tax collected. Based on our review of exemptions claimed, additional tax and interest is due, for an exemption adjustment in the amount of \$948.86. (*see Exhibit A*).

**Finding #2:** The hotel operator did not submit a monthly tax return or remit tax collected for the period of February 1 through February 23, 2022. Additional tax and interest are due for a revenue adjustment in the amount of \$2,792.25 (*see Exhibit B*).

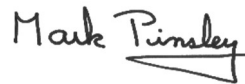
- Procedure:** Verification of reported revenue and hotel room rental tax collections to hotel operator accounting records.

**Finding:** No exceptions were found as a result of applying the procedure.

This agreed-upon procedures engagement was conducted in accordance with generally accepted government auditing standards and “Government Auditing Standards” as issued by the United States Government Accountability Office (GAO) and “Statements on Standards for Attestation Engagements” as issued by the American Institute for Certified Public Accountants (AICPA).

We were not engaged to and did not conduct an examination or a review of the subject matter, the objective of which would be the expression of an opinion or a conclusion, respectively, on hotel room rental tax remittances from License #2022-056, Allentown Park Hotel for the period January 1, 2022 to December 31, 2022. Accordingly, we do not express such an opinion or a conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you. We are required to be independent of the responsible party and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements relating to the agreed-upon procedures engagement.

This report is intended solely for the information and use of the county fiscal officer and management of the County of Lehigh and is not intended to be and should not be used by anyone other than these specified parties. However, this report is a matter of public record and its distribution is not limited.



Mark Pinsley  
County Controller

Attachment

Date: March 21, 2024  
Allentown, PA

Audited by: Brian O'Donnell

Final Distribution

Phillips Armstrong, County Executive  
Board of Commissioners  
Ed Hozza, Director of Administration  
Stephen Berndt, Lead Accountant  
Benjamin Schwarcz, CPA





**COUNTY OF LEHIGH**  
Office of Fiscal Affairs

**Timothy A. Reeves**  
Chief Fiscal Officer

March 27, 2024

Steven Mendel, Managing Member  
Allentown Park Hotel  
7471 Keebler Way  
Allentown, PA 18106

RE: HOTEL TAX "DETERMINATION"  
Allentown Park Hotel

Dear Mr. Mendel:

According to the recent agreed-upon procedures performed by the Lehigh County controller's office, hotel tax and interest is due for the period January 1, 2022 to December 31, 2022.

In accordance with Section G of the Hotel Tax Rules and Regulations, you are hereby requested to remit the sum of \$3,741.11. The calculations of the "determination" (as stated in Section G) were included in the Lehigh County controller's office draft report. Failure to remit the payment within **ten (10)** days as requested will result in additional penalties, attorney fees, and fines as stated in Section G.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Timothy Reeves", is written over a horizontal line.

Timothy Reeves  
Chief Fiscal Officer

Enclosure

xc: Mark Pinsley, County Controller

HOTEL TAX/HOTEL TAX DETERMINATION LETTER