



OVERTON/PICKETT EMERGENCY COMMUNICATIONS DISTRICT

Comptroller's Investigative Report
April 24, 2018

Justin P. Wilson, Comptroller





JUSTIN P. WILSON
Comptroller

JASON E. MUMPOWER
Chief of Staff

April 24, 2018

Board of Directors
Overton/Pickett Emergency Communications District
255 Industrial Park Drive
Livingston, TN 38570

Gentlemen:

The Office of the Comptroller of the Treasury conducted an investigation of pertinent records of the Overton/Pickett Emergency Communications District, and the results are presented herein. As part of our investigation, we attempted on multiple occasions to speak with all full-time employees of the district. However, the majority of full-time district employees declined to meet with investigators; therefore, we were unable to confirm whether many of the district purchases were for the benefit of the district and its employees or for personal benefit.

The director also serves as the Emergency Management Agency director as appointed by the Overton County Executive. In addition, the director serves as the Overton County Title V, OSHA coordinator, and the assistant medical investigator. The director serves on many emergency agency boards including the Local Emergency Planning Commission and the Upper Cumberland 911 Director's Association. Furthermore, the director is a founding member of a nonprofit agency called the 911 Winter Workshop. IRS filings for the 911 Winter Workshop note the director's primary address as the nonprofit's mailing address and noted that the 911 Winter Workshop's principal officer is the director's wife who is also a district employee.

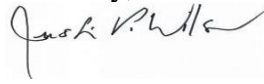
Our investigation indicated that district funds were used to support these multiple agencies, the director's other appointed positions, and for his and others personal benefit; therefore, we question whether the use of funds was exclusively for the district as required by Section 7-86-102(d), *Tennessee Code Annotated*.

Findings and recommendations, as a result of our investigation, are presented in this report. Also, these findings and recommendations have been reviewed with the district attorney general for the Thirteenth Judicial District and subsequently with the Thirty-first Judicial District, district attorney general Pro Tem.

Board of Directors
Overton/Pickett Emergency Communications District
April 24, 2018

Copies of this report are being forwarded to Governor Bill Haslam, the State Attorney General, the District Attorney General, certain state legislators, and various other interested parties. A copy is available for public inspection in our office and may be viewed at <http://www.comptroller.tn.gov/ia/>.

Sincerely,



Justin P. Wilson
Comptroller of the Treasury

INVESTIGATIVE REPORT

OVERTON/PICKETT EMERGENCY COMMUNICATIONS DISTRICT

BACKGROUND

The Overton/Pickett Emergency Communications District (the district) was established after a merger agreement was signed in 2012 between the Overton County Emergency Communications District and the Pickett County Emergency Communications District. The purpose of the merger was to improve response of emergency services in both Overton and Pickett Counties.



The district provides enhanced 911 emergency telephone service for the area. The district operates through directives from a 13-member board and has a director who oversees its daily operations. Nine members of the governing board are appointed by the Overton County Commission and four members are appointed by the Pickett County Commission. The district is reported as a component unit of Overton County.

The district does not have the authority to levy or collect taxes but is instead supported primarily by a 911 surcharge collected by communication service providers from their customers. These fees are collected by the State of Tennessee and subsequently remitted to the district by the Tennessee Emergency Communications Board. Wireless communications income is from a share of state-collected revenues from cell phone usage based upon population.

The district is required to follow the *Accounting and Financial Reporting Manual for Tennessee Emergency Communications Districts* (E-911 Manual) prescribed by the Tennessee Comptroller of the Treasury. The E-911 Manual defines the allowable and prohibited uses of the district's revenue. Furthermore, districts may receive funds from federal, state, and local governmental

sources as well as private sources. Any use of district revenue must comply with Section 7-86-102(d), *Tennessee Code Annotated*, which states that the funds received by districts “from all sources shall be used exclusively in the operation of the emergency communications district.”

INVESTIGATIVE FINDINGS AND RECOMMENDATIONS

FINDING 1: The district had questionable expenditures of at least \$84,097.95

Our investigation revealed that the district had questionable expenditures of at least \$84,097.95. These expenditures involved the personal use of the district’s credit card for fuel; other questionable credit card charges; questionable purchases for equipment, training, meals, and tower climbs; and travel advances paid in excess of the district’s approved travel policy. We question whether many of these expenditures were for a business-related purpose and whether the items were used exclusively in the operation of the district.

The purchases we question are summarized in the following table:

Item	Description	Amount
A.	Personal use of district credit card for fuel	\$ 678.05
B.	Items not exclusively used in district operations	4,549.65
C.	Possible conflict of interest purchases	9,255.38
D.	Food purchases	18,700.12
E.	Equipment purchases	18,100.21
F.	Other items	3,501.56
G.	Payments for training, software, and training equipment	8,016.96
H.	Purchases for public relations	3,995.62
I.	Payments for tower climbs	12,590.40
J.	Payments for travel in excess of policy	<u>4,710.00</u>
	Total	<u>\$84,097.95</u>

Each questionable item is discussed below:

ITEM A. The district director used district credit cards for fuel purchases totaling \$678.05 while on multiple personal out-of-state trips

The district director used his assigned district vehicle on multiple personal trips out-of-state while charging fuel totaling \$678.05 to district credit cards. The district’s vehicle use policy states that “the director per contract shall be provided a vehicle for personal and professional use;” however, the policy does not define “personal use.” Also, the director is to report all personal use of the district vehicle as a taxable benefit.

District board members were not aware that the director had used the district’s vehicle on multiple occasions for personal out-of-state travel and had charged fuel to district’s credit cards while on the out-of-state trips.

The district's board chairman advised us that the board allows the director to use a district vehicle for normal personal business while being on call almost all the time. However, he feels that the policy is open for the director to take personal trips out-of-state with the district's vehicle and purchase fuel with district funds. He further advised that he does not recall the director seeking permission to use the district vehicle for personal out-of-state trips or to pay for the fuel with district funds; but if the director did ask for permission from the board, the board would grant permission.

However, other district board members acknowledged that the use of district credit cards for fuel purchases while on personal out-of-state trips was not considered an allowable use of district funds. One board member stated that he would not approve taking a district vehicle out-of-state on a purely personal trip. Board members advised fuel purchases on such a trip should be paid for by the director, and if the district paid for those fuel purchases, the district should be reimbursed.

During our investigation, it appears that the director did include an estimated \$780 taxable personal benefit (260 days x \$3/day) for the use of the assigned district vehicle.

RECOMMENDATION FOR ITEM A:

The district board should develop written policies and procedures to define the allowable personal use of district vehicles and credit cards and the reporting of such use.

ITEM B: The district made purchases totaling \$4,549.65 for items not exclusively used in district operations

Disbursements totaling \$4,549.65 were made with district funds for items not exclusively used in the operation of the district. Section 7-86-102(d), *Tennessee Code Annotated*, states that funds "shall be used exclusively in the operation of the emergency communications district."

- 1) The district paid \$380 for the fabrication of a stainless-steel worktop located in the American Legion Building. The director advised that the district purchased the worktop in exchange for use of the larger building for meeting space.



- 2) We noted a questionable related party transaction by the district's director. As part of an agreement dated April 20, 2016, the district paid shipping costs of \$1,900.43 to ship a John Deere 644E front-end loader purchased by the director's brother from the City of Byrdstown in exchange for a communication tower owned by the director's brother. However, the shipment was canceled, and the director's brother transported the communication tower to the district and picked up the front-end loader. Shipping charges of \$1,637.70 were refunded May 10, 2016, leaving a credit of \$262.73 (\$1,900.43 minus \$1,637.70) to apply toward future shipments. Therefore, the \$262.73 shipping charge not refunded would be considered a prohibited use of district funds.
- 3) The district made questionable, related party payments totaling \$400 to four of the director's children/step-children for work performed outside the scope of the district's functions. The director advised that a local bank accepted disaster assistance donations after an ice storm in February 2015 and citizens affected who were seeking disaster assistance should complete paperwork documenting their personal information. The director's children/step-children entered the data into Excel spreadsheets to facilitate the award and disbursement of funds by the bank. Documentation provided did not detail the dates the work was performed, hours worked, or detail the work performed. Furthermore, although we were advised the work was performed for the February 2015 disaster, the checks were not issued until October 2015.
- 4) The district made various purchases totaling \$3,441.01 for emergency response items for the director's assigned district vehicle. Items included warning lights, concealment speaker, and linear traffic advisory. These items appear to be for emergency response but are considered prohibited uses of district revenue as outlined by the E-911 Manual, which notes prohibited uses as "Capital costs or operational costs for emergency response equipment or emergency response personnel which respond after the 911 call is dispatched, transferred, or relayed."

As previously noted, the district director also serves as the Overton County Emergency Management Agency (EMA) director, a position appointed by the Overton County Executive. We were advised that the work of the EMA director and the district director are "all tied together," and often responsibilities overlap. It appears the director is using the assigned vehicle for emergency response purposes.



- 5) Our investigation noted a credit card charge for the purchase of three pairs of Wrangler pants totaling \$65.91, which the director advised were purchased as part of an employee's uniform. The investigation noted purchases of embroidered shirts and jackets issued as part of an employee's uniform; however, no other purchases of pants for employees were noted, and specific types of pants do not appear to be required district uniform items. The purchase of pants appears to be a personal benefit rather than related to district operations.

RECOMMENDATION FOR ITEM B:

The district should make purchases of items that are used exclusively in the operation of the emergency communications district.

ITEM C: Purchases totaling \$9,255.38 were not arms-length transactions and could appear to be conflicts of interest

Our investigation revealed the following instances of purchases that were not made in arms-length transactions; therefore, these transactions could appear to be conflicts of interest.

- 1) The district purchased a used John Deere lawn tractor from Masiongale Farms for \$4,000. We were advised that the lawn tractor was owned by the district director and was being used to mow tower sites and district property prior to being purchased by the district. Our review of board minutes indicated that both the purchase and the price were approved by the district board. We were advised that the purchase price was determined by the board; however, from the information provided, we could not determine if the purchase price reflected a fair market value.
- 2) The district director advised that he donated his personal 20-foot gooseneck trailer to the district in March 2017; however, the trailer was in disrepair at the time. We do not have documentation of this donation. In April 2017, the district purchased axles for the trailer totaling \$2,025.38. The director stated that an individual is supposed to make the axle repairs; however, no agreed upon price was noted, and as of November 27, 2017, the trailer had not been repaired.



Prior to donating the trailer to the district, the director advised that the district as well as other emergency departments often used his personal trailer. Therefore, the district subsequently purchased parts to repair the trailer.

- 3) In July 2016, the district purchased a 100-foot communication tower from the director's brother for \$3,230. The purchase price included \$730 for delivery from Indiana. However, the board did not approve this purchase, and at least one board member who is also a check signer was unsure whether the tower from Indiana was purchased with district funds.

The district has not adopted a conflict of interest policy. A conflict of interest policy would provide more transparency to the district's transactions.

RECOMMENDATION FOR ITEM C:

All purchases should be arms-length transactions supported with adequate documentation. The district board should adopt written conflict of interest policies to provide guidance to its employees.

ITEM D: Questionable purchases of food totaling \$18,700.12 were made with district funds

During the period July 1, 2015, through August 31, 2017, questionable purchases of food totaling \$18,700.12 were made with district funds. Food purchases were made on a regular basis and appear to be a general practice of the district. Some purchases were not adequately supported with itemized receipts, some other purchases were made on weekends, and some appear to be for only one or two meals. Furthermore, we question whether many of these food/supply purchases were solely for a district-related purpose. The regular and general purchase of food without specific and proper documentation could lead to fraud and abuse.

- 1) During the period examined, the district made numerous purchases of food at local restaurants and at local grocery stores totaling \$13,119.96. (Refer to Exhibit 1.) In several instances, no detailed receipts were on file to support the purchase; therefore, we could not determine what was purchased. Furthermore, we noted several food purchases made on weekends had no documented purpose.

1	16oz BEER BLUE MOON	4.99
1	16oz BEER BLUE MOON	4.99
1	FRIED CRAW TAILS	10.95
1	NO DRINK	0.00
1	SMALLMOUTH SIRLOIN MED RARE SIDE SALAD GREEN BEANS	16.95
1	16oz BEER BLUE MOON	4.99

We were advised by the district director that the district provides food for weekly supervisors/manager meetings, board meetings, and other emergency-related meetings. However, during the period examined, the district board had fewer than 10 documented meetings.

The district board meets once a year at a local restaurant with guests and family invited. During the period examined, two board meetings were held at the Pier 42 Restaurant, and \$1,357.83 was charged to the district's credit cards for food and beverages.

Furthermore, at the September 2016 board meeting, alcohol was purchased and subsequently charged to the district's credit card as part of the total expense. The purchase of alcohol is a prohibited use of district funds.

Exhibit 1

Date	Store	Amount	Date	Store	Amount
07/01/15	Farmhouse Restaurant	\$ 40.06	11/03/15	Jerry's IGA	\$ 47.40
07/07/15	Jerry's IGA	61.70	11/10/15	Jerry's IGA	46.67
07/14/15	Jerry's IGA	84.77	11/10/15	Dixie Cafe	318.00
07/17/15	Dragon Express	77.87	11/17/15	Jerry's IGA	54.03
07/21/15	Captain D's	49.34	11/19/15	KFC	87.48
07/22/15	Pizza Hut	108.14	11/24/15	Jerry's IGA	83.90
07/25/15	Jerry's IGA	24.44	11/25/15	Donut Zone	24.09
07/25/15	McDonald's	41.50	12/01/15	Jerry's IGA	109.53
07/28/15	Farmhouse Restaurant	62.90	12/01/15	Jerry's IGA	19.29
07/31/15	Pizza Hut	49.26	12/08/15	Jerry's IGA	24.82
07/31/15	Pizza Hut	97.98	12/10/15	Kroger	438.51
08/04/15	Jerry's IGA	68.01	12/15/15	Jerry's IGA	160.68
08/12/15	Dragon Express	45.53	12/15/15	KFC	132.47
08/15/15	Jerry's IGA	64.28	12/23/15	Donut Zone	76.23
08/17/15	McDonald's	64.22	12/23/15	McDonald's	23.18
08/17/15	Pizza Hut	123.74	12/30/15	Burger King	25.79
08/25/15	Dale Hollow 1-Stop	69.13	01/05/16	Dollar General Market	1.98
08/26/15	Dairy Queen	29.62	01/05/16	Jerry's IGA	46.36
08/26/15	Dale Hollow 1-Stop	214.86	01/12/16	Jerry's IGA	22.00
09/02/15	Jerry's IGA	8.88	01/12/16	KFC	148.20
09/11/15	Martins Barbeque Joint	216.86	01/13/16	Dragon Express	54.70
09/15/15	Jerry's IGA	65.96	01/19/16	Dragon Express	75.00
09/21/15	Long John Silvers	68.97	01/22/16	Burger King	33.30
09/22/15	Jerry's IGA	67.37	01/22/16	Pizza Hut	106.74
09/22/15	Jerry's IGA	36.27	01/30/16	Captain D's	67.88
09/25/15	Pier 42 Restaurant	686.52	02/01/16	Hardee's	7.19
09/25/15	Pizza Hut	145.64	02/02/16	Jerry's IGA	37.18
09/25/15	Arby's	56.37	02/05/16	Jerry's IGA	21.73
09/26/15	Dairy Queen	6.88	02/16/16	Jerry's IGA	60.09
09/26/15	McDonald's	5.90	02/19/16	KFC	53.88
09/29/15	Jerry's IGA	45.99	02/23/16	Jerry's IGA	43.47
10/06/15	Hardee's	46.72	02/26/16	Walmart	46.89
10/06/15	Jerry's IGA	53.13	02/27/16	Pizza Hut	132.42
10/09/15	Pizza Hut	55.57	03/01/16	Dragon Express	47.63
10/10/15	Jerry's IGA	33.34	03/22/16	Pizza Hut	228.71
10/24/15	Food Lion	70.41	03/24/16	Jerry's IGA	23.96
10/26/15	Donut Zone	36.14	03/24/16	Jerry's IGA	38.47
10/27/15	Jerry's IGA	42.17	03/24/16	KFC	54.73
10/30/15	KFC	59.83	04/11/16	Subway	105.12
			04/13/16	Arby's	96.33
			04/26/16	Dragon Express	74.73
	Subtotals	\$3,186.27			\$3,300.76

Date	Store	Amount	Date	Store	Amount
05/03/16	Zaxby's	\$ 92.12	10/20/16	Pizza Hut	\$ 61.25
05/09/16	JD's Sandwich Shop	67.25	10/21/16	McDonald's	59.73
05/10/16	Jerry's IGA	62.79	10/25/16	Jerry's IGA	14.12
05/17/16	Jerry's IGA	21.25	10/25/16	KFC	184.29
05/19/16	Food Lion	62.38	10/27/16	Jerry's IGA	54.65
05/19/16	Food Lion	58.02	10/28/16	Donut Zone	23.63
05/19/16	Walmart	77.63	11/01/16	Zaxby's	121.79
05/20/16	Burger King	39.77	11/04/16	Rickman Food Mart	68.98
05/20/16	McDonald's	84.28	11/30/16	Arby's	65.21
05/24/16	Jerry's IGA	76.78	12/02/16	Jerry's IGA	18.09
06/03/16	Jerry's IGA	21.50	12/08/16	Kroger	190.70
06/07/16	Jerry's IGA	66.59	12/09/16	Jerry's IGA	44.65
06/21/16	Jerry's IGA	68.33	12/13/16	Pizza Hut	95.94
06/23/16	Jerry's IGA	22.26	12/20/16	The Clark House	72.62
06/23/16	Save a Lot	8.60	12/22/16	KFC	150.78
06/28/16	Dragon Express	69.59	12/27/16	KFC	48.65
07/05/16	Subway	39.80	01/03/17	The Clark House	82.10
07/12/16	Jerry's IGA	62.32	01/10/17	Jerry's IGA	31.97
07/19/16	Zaxby's	57.47	01/10/17	KFC	148.59
08/02/16	Jerry's IGA	17.94	01/17/17	Dragon Express	85.14
08/02/16	Jerry's IGA	62.34	01/31/17	KFC	54.11
08/03/16	Arby's	39.20	02/14/17	The Clark House	72.91
08/18/16	Dollar General Market #12	8.06	03/08/17	Arby's	45.44
08/18/16	Food Lion	71.00	03/14/17	Bellacino's Pizza	79.03
08/18/16	Jerry's IGA	59.82	03/15/17	Jerry's IGA	235.74
08/23/16	KFC	98.55	03/21/17	Pizza Hut	76.64
08/23/16	KFC	70.44	04/13/17	Pizza Hut	65.70
08/26/16	Pizza Hut	155.47	04/18/17	Pizza Hut	9.03
09/06/16	Dale Hollow 1-Stop	276.53	04/18/17	Pizza Hut	139.59
09/09/16	KFC	59.11	04/19/17	Jerry's IGA	61.66
09/13/16	Dragon Express	53.38	05/07/17	Jerry's IGA	44.19
09/13/16	Hardee's	35.48	05/19/17	McDonald's	181.06
09/13/16	McDonald's	3.83	05/30/17	KFC	70.34
09/14/16	Cracker Barrel	14.26	06/06/17	Food Dude Conc	7.69
09/14/16	McDonald's	5.35	06/06/17	Food Dude Conc	46.17
09/21/16	KFC	29.26	06/13/17	KFC	189.44
09/22/16	Pier 42 Restaurant	671.31	06/20/17	Jerry's IGA	224.30
10/04/16	Jerry's IGA	84.78	06/29/17	KFC	123.95
10/09/16	Jerry's IGA	88.47	07/14/17	32 Degrees Frozen Yogurt	8.27
10/12/16	Arby's	59.96	07/14/17	Captain D's	28.43
10/17/16	Pizza Hut	83.13	07/15/17	Dairy Queen	19.59
10/18/16	Jerry's IGA	85.33	07/17/17	Jerry's IGA	35.04
	Subtotals	<u>\$ 3,191.73</u>		Total	<u>\$ 3,441.20</u>
					<u>\$13,119.96</u>

- 2) Our investigation noted questionable purchases totaling \$5,580.16 made at Sam’s Club during the period examined. These purchases included items such as nuts, pastries, crackers, condiments, shredded cheese, popcorn, orange juice, canola oil, sodas, Gatorade, plates, cutlery, vitamins, and other miscellaneous food items. We were unable to ascertain whether these purchases were business related or personal in nature.

Purchases were frequent and appear to be for general use. **(Refer to Exhibits 2, 3, and 4 in the Appendix of this report).** The director advised that food items were purchased for special occasions such as meetings or for employees. The director stated that employees work 12-hour shifts; so, the district tries to make the employees as comfortable as possible. The chairman and board members advised us they were not aware of regular purchases of food items and related supplies for employees. We could not confirm that employees were provided food and related supplies regularly. As previously noted, several district employees declined to meet with investigators. Therefore, we could not confirm if all these purchases were district related or personal.

The chairman of the board stated that he had no idea whether food is provided to district employees. Other board members were also unaware of any regular food purchases for district employees.

ALB000 TN 38506			
ST#	05175	OP#	004809
		TER	12
		TR#	04850
HXD XMAS CC	007874204919	F	6.00 R
COOKIES	007874212335	F	6.00 R
REE SUGAR	007874217889	F	6.00 R
TB BRUNIE	077090109399	F	6.00 R
BV CHILI SAU	007874200005	F	1.44 R
BV CHILI SAU	007874200005	F	1.44 R
BV CHILI SAU	007874200005	F	1.44 R
ORG CARROTS	068113109121	F	2.78 R
DRIED BEEF	001700001678	F	2.47 R
VEL GRP JEL	004180050150	F	1.98 R
BRDC FLORET	068113132884	I	2.24 R
CAULIFLOWER	068113109138	F	2.58 R
CUCUMBER	000000004062KI		0.68 R
93/07 BRD-BF	002718257416	F	9.84 R
HF 2 CCKTLS	004450005190	F	4.98 R
HF 2 CCKTLS	004450005190	F	4.98 R
FLOUR TORT	007979107200	F	4.88 R
SANTITAS	002840000210	F	2.00 R
SANTITAS	002840000210	F	2.00 R
CREAM CHEESE	002100061223	F	2.48 R
CREAM CHEESE	002100061223	F	2.48 R
CREAM CHEESE	002100061223	F	2.48 R
CREAM CHEESE	002100061223	F	2.48 R
CREAM CHEESE	002100061223	F	2.48 R
CREAM CHEESE	002100061223	F	2.48 R
CREAM CHEESE	002100061223	F	2.48 R
HILD ROLL SA	007229000000	F	2.78 R
HILD ROLL SA	007229000000	F	2.78 R
HILD ROLL SA	007229000000	F	2.78 R
SANTITAS	002840000210	F	2.00 R
SANTITAS	002840000210	F	2.00 R
VELVEETA 2LB	002100061161	F	6.88 R
VELVEETA 2LB	002100061161	F	6.88 R
2 MILK	007874235201	F	1.89 Y
ID 640Z SBP	004127102772	F	4.98 R
ROTEL 100Z	006414428243	F	0.98 R
ROTEL 100Z	006414428243	F	0.98 R
SOUR CREAM	007942000011	F	1.98 R
SOUR CREAM	007942000011	F	1.98 R
BUCOLJACK32Z	060998018764	F	7.94 R
BISQUICK 40	001600042040	F	3.33 R
RITZ	004400003111	F	2.56 R
DHV 4 PK	007110021015	F	4.58 R
SUBTOTAL			141.91
TAX 2	7.750	R	11.00
TOTAL			152.91
SAHS B CREDIT			152.91

Various general food items: milk, Bisquik, cauliflower, cucumber, cheese, Rotel

Examples of general food purchases:

P.O.#	DESCRIPTION	QUANTITY	UNIT	PRICE
000011645	MIXED NUTS W PEANUTS	1.000	EA	\$15.9800
000028914	BEANEE WEENIES	1.000	EA	\$10.1800
002378669	CASHEW HALVES & PCS	1.000	EA	\$17.9800
003646135	CHICKEN RAMEN	1.000	EA	\$8.8700
031606638	TOTINOS PIZZA ROLL	1.000	EA	\$8.9800

Examples of multivitamins and medicine:

021858704	CENTRUM SILVER	1.000	EA	\$19.9800
022468983	ADVIL TABLETS	1.000	EA	\$17.4800
025327908	DAYQUIL/NYQUIL COMBO	1.000	EA	\$16.4800
026218594	MUCINEX MAX DM	2.000	EA	\$25.9800
028841618	DELUXE MIXED	1.000	EA	\$13.9800
029057138	ALEVE CAPS	1.000	EA	\$16.9700
044766857	AIRBORNE CHEWABLES	1.000	EA	\$16.4800
046622251	MM ES OMEGA 3 KRILL	1.000	EA	\$23.4800
046650585	MM VIT C 1000MG	1.000	EA	\$13.9600
049495968	MM CINNAMON CINSULIN	1.000	EA	\$18.5800

RECOMMENDATION FOR ITEM D:

All purchases should be approved by the district board, supported with detailed receipts, and should be for items used exclusively for the business operation of the district. District funds should not be used for the purchase of alcohol.



ITEM E: Questionable purchases of equipment totaling \$18,100.21 were made with district funds

Our investigation noted questionable purchases of various equipment totaling \$18,100.21. We were unable to ascertain whether these purchases were business related and a benefit to the district. We were advised that some items had been used very little since purchased. Furthermore, many of these questionable purchases appear to benefit multiple departments and not solely for the emergency communications district.

- 1) In October 2015, the district purchased a Patriot Trailer for \$3,885. The director advised that the district used the trailer to store and transport tables and chairs for emergency response situations in which a mobile command station was necessary as well as for public relation events. The trailer is used by other emergency departments

as requested. When we requested to see the trailer, we were advised that the trailer was being used by another fire department; however, we were unable to verify their use because the trailer was returned to district property within an hour after we asked to verify the trailer's location.



2) The district purchased a 500-pound ice machine in July 2015, and subsequently traded the ice machine for a larger machine in November 2015. During the period examined, the district made

disbursements totaling \$4,163 for the ice machine as well as maintenance and repair of the ice machine. As noted in Finding 2, in at least two instances, the invoices for the ice machine purchase or repair were created by the district director.



3) In November 2015, the district purchased a massage chair for \$3,599.95. The massage chair is located at the emergency communications district. We were advised that employees use this room as a quiet space.



4) In December 2015, the district purchased a drill press and related items for \$435.30. Furthermore, the district purchased a sand blast cabinet, sand, and glass bead abrasive as well as an air compressor for operation of the sand blast cabinet in December 2015 and January 2016 for \$3,516.96. The drill press and the sand blast cabinet are located in the Emergency Management Agency building.



SandBlaster



Drill Press



Air Compressor for
SandBlaster

- 5) The district purchased a golf cart from an individual in February 2016 for \$2,500. The director advised that the golf cart was used at public relation-type events. The golf cart is stored at the rescue squad building located directly behind the district board room building.



Our review of the district's board minutes did not reflect discussions or approval of these equipment items. However, several board members advised they were aware of several of the purchases, but they did not know the use of the equipment, specifically the drill press and sandblaster.

RECOMMENDATION FOR ITEM E:

Purchases of equipment should be approved by the district board as recorded in the board's minutes. All equipment purchases should be supported by original invoices, be for the exclusive use of the district, and should be stored on district property.

ITEM F: Other questionable purchases totaling \$3,501.56 were made with district funds

Our investigation revealed that district funds totaling \$3,501.56 were used to purchase various items, which do not appear to be integral to the operations of the district.

- 1) In September 2015, the district purchased wall art for \$411.56 from Thomas Kinkade in Pigeon Forge, Tennessee. The art is displayed in the director's office; however, the purchase does not appear to directly benefit the call center.



- 2) The district purchased Sam's Club memberships totaling \$1,010 for its employees and AirEvac memberships for its employees and board members totaling \$2,080. AirEvac is a part of an alliance with the AirMedCare Network to provide American's the largest air ambulance membership network. We question these employee and board member benefits as permissible uses of district funds.

RECOMMENDATION FOR ITEM F:

All purchases should be approved by the district board and be used exclusively in the operation of the emergency communications district.

ITEM G: The district had questionable expenditures for training classes, products, and training equipment totaling \$8,016.96

The district had questionable expenditures for training classes, products, and training equipment totaling \$8,016.96. The district director is an instructor and program coordinator for the Emergency Medical Technology (EMT) program at the Tennessee College of Applied Technology (TCAT) located in Livingston, Tennessee. During the period examined, we could not determine whether the testing software, study aides, and other EMT training equipment were used by district employees or by students enrolled in the EMT program at TCAT.

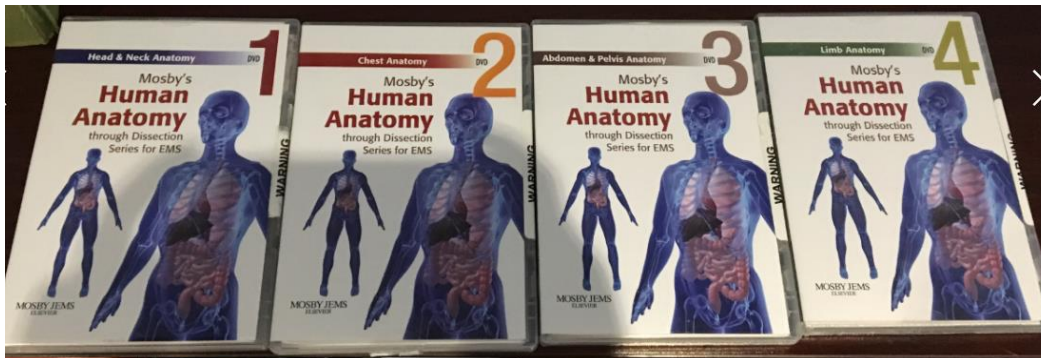
- 1) We noted that the district paid \$2,291.50 for tuition and books at the TCAT. Of this amount, \$1,238.59 was tuition for the EMT program for a part-time employee and son of a 911 Winter Workshop board member, and \$151.09 was paid for EMT books of a district employee. The remaining \$901.82 was for books and supplies for an employee enrolled in the Information Technology (IT) program at TCAT.

We were advised that per district policy, dispatchers are required to attend EMT school as part of their job requirements. However, the investigation did not discover a policy authorizing the district to use district funds to pay for EMT or IT classes, books, and supplies.

- 2) We noted payments for study aides, testing software, and other training materials totaling \$3,112.30. We were advised that the study aides and testing software were for employees enrolled in the EMT program. During the period examined, we noted two district employees enrolled in the EMT program. We could not determine any other employees who were enrolled in an EMT program and/or benefited from the study aides, testing software, or training materials. The investigation did not discover a policy authorizing the district to use district funds to pay for study aides, testing software, and other training material related to an EMT program.
- 3) We noted several questionable items purchased totaling \$2,613.16. Items included stethoscopes, a rescue knife, game buzzers, human anatomy videos, EMT scissors, and an airway management trainer. We were advised that several in-house training opportunities/classes are available for employees, and district equipment is used at these training classes. However, we were not provided a list of training classes, and the district training officer never returned our calls/emails/etc. As previously noted, several district employees declined to speak with investigators; therefore, we could not determine if district purchased equipment, products, software, etc., was used for employee training at the district.

Date	Equipment	Amount
08/24/2015	Stethoscope and rescue knife	\$ 273.00
08/25/2015	EMT scissors	24.95
01/14/2016	Mosby's Human Anatomy	763.47
01/26/2016	Stethoscope	384.99
08/04/2016	12 user game buzzers	399.95
09/07/2016	Three-year-old management trainer with board	<u>766.80</u>
	Total	<u>\$2,613.16</u>

Items Ordered	Price
1 of: 7770370 Stethoscope Littmann 3100 NBlue Ea 3M MED -3100NB Sold by: Kay Rehab (seller profile)	\$384.99
Condition: New	


Items Ordered	Price
1 of: Me First v.2 Wireless game buzzers -- 12-user set (12-player + facilitator) Sold by: Office Oxygen (seller profile)	\$399.95
Condition: New	



SIMULAIDS

Pediatric Airway Management Trainer



Designed for the teaching and practicing of child intubation, this manikin gives students the realistic opportunity to practice the specialized intubation procedure. The 3-year-old child manikin contains teeth, uvula, vocal cords, glottis, epiglottis, larynx, arytenoid cartilage, trachea, esophagus, and inflatable lungs and stomach. The manikin is mounted on practice boards for easy use in class. The vocal cords are highlighted in white for easy viewing with laryngoscope. Comes with lubricant and sturdy nylon carry bag.

RECOMMENDATION FOR ITEM G:

The district's board should adopt written policies and procedures governing required employee training, training classes, training equipment and supplies, and the funding related to training. Documentation should be on file detailing the training classes attended, tools required, and employees attending.

ITEM H: The district made questionable disbursements totaling \$ 3,995.62 for items noted as public relations

Our investigation noted questionable disbursements totaling \$3,995.62 for items noted as public relations. The district director's wife works at the district as a dispatcher and as public relations manager. We were advised that part of public relations for the district includes working with other emergency service agencies at public events to educate the public, especially children calling 911 or misdialing 911.

However, we were advised that district funds are also used to show appreciation to other emergency service departments and to foster good relationships with other departments. Items purchased included graduation cups, keychains and totes, car chargers, flashlights, and sports bottles. These items are questionable since they do not directly support the mission of the district, rather they appear to be used to foster good relationships in the community and with other emergency management agencies.

Cart	Qty	Price	Total
Class of 2016 Graduation Cups IN-13728703 50 Piece(s) Est Delivery: Apr 18, 2016	1	\$7.99	\$7.99
Class of 2016 Yellow Beverage Napkins IN-13721786 50 Piece(s) Est Delivery: Apr 18, 2016	1	\$5.99	\$5.99
Small Class of 2016 Graduation Totes IN-13729158 Per Dozen Est Delivery: Apr 18, 2016	1	\$15.99	\$15.99
Class of 2016 Jeremiah 29:11 Key Chains with Card IN-13723326 Per Dozen Est Delivery: Apr 18, 2016	1	\$6.25	\$6.25
Graduation Dog Tag Necklaces IN-13728199 Per Dozen Est Delivery: Apr 18, 2016	6	\$5.00	\$30.00
Class of 2016 Key Chains IN-13729196 Per Dozen Est Delivery: Apr 18, 2016	28	\$6.25	\$175.00

In some instances, invoices were not properly supported with details of the purchase; therefore, we could not determine if items purchased were business related or personal in nature. Furthermore, as noted in Finding 2, in at least one instance, district funds were used to purchase items for the 911 Winter Workshop event and subsequently reimbursed.

Date	Payee	Amount	Type of Payment
07/19/2015	Positive Promotions	\$ 504.70	AMEX
12/03/2015	PSTC-911 Care	215.04	Sam's CC
01/19/2016	Myron Corporation	305.02	Checking
02/13/2016	Positive Promotions	933.91	AMEX
02/15/2016	Positive Promotions	93.38	Sam's CC
04/13/2016	Oriental Trading	265.34	Sam's CC
06/07/2016	4imprint	432.23	Sam's CC
06/07/2016	4imprint	524.55	Sam's CC
11/30/2016	Myron Corporation	320.08	Checking
08/23/2017	Myron Corporation	<u>401.37</u>	Checking
Total		<u>\$3,995.62</u>	

RECOMMENDATION FOR ITEM H:

The district's board should have written policies and procedures related to the extent of its public relations involvement and the type of expenditures that are approved for public relations. All expenditures should be supported by detailed invoices.

ITEM I: Deficiencies existed with payments for tower climbs totaling \$12,590.40

Tower climbs are performed by individuals trained in rope safety and rescue who climb the entity's communication towers for maintenance and repairs, realignment of equipment, and tower installation or disassembly. During the period examined, our investigation revealed that district funds totaling \$12,590.40 were made to 10 different individuals for tower climbs. Of these payments, three individuals have relationships to the district director or district employees and received 75 percent of total district funds paid for tower climbs.

Relationship	Amount
Employee and son of 911 Winter Workshop board member	\$3,000
Engaged to district director's daughter	5,470
Engaged to district employee's daughter	<u>1,000</u>
Total	<u>\$9,470</u>

- 1) At least 10 individuals were paid for tower climbs. In many instances, payment was made without adequate supporting documentation. Documentation presented for payment often did not include the date worked, location, and were often not signed by the individual or a supervisor as approval of work performed. We were advised that

individuals were chosen for tower climbs often based on availability. However, as noted above, three individuals with relationships to the district director or district employees were most often paid for tower climbs; therefore, we could not determine whether these tower climbs occurred (based on the lack of documentation).

- 2) No written policy or contract was on file to support the amount of payment for tower climbs. We were advised that individuals received \$250/day for tower climbs regardless of how many towers or climbs were needed on a given day. Furthermore, individuals were not required to provide proof of liability insurance.

RECOMMENDATION FOR ITEM I:

Documentation should be on file to support the selection of the person for the tower climb, the date worked, and location of the tower. This documentation should be signed by the climber as evidence the work was performed and by a supervisor as evidence of approval for payment. The district board should adopt a pay rate for tower climbs, and proof of a climber's liability insurance should be on file.

ITEM J: **The district paid travel advances totaling \$4,710 in excess of the approved travel policy**

The district paid travel advances totaling \$4,710 to the district director and district employees for meals and incidentals in excess of the approved travel policy. The district's travel policy states that "you will be reimbursed based on Governmental Services Administration (GSA) calculation for meals and incidentals." The GSA allows for meals and incidentals to be reimbursed when employees are away from their official station longer than 12 hours. Our examination revealed numerous instances in which employees were issued advances by the district for meals and incidentals when no overnight travel was involved nor did the district provide documentation that the employee was away from their official station longer than 12 hours. Furthermore, in a few instances, the amount paid for meals and incidentals was in excess of the allowable rate. All these instances are violations of the district's travel policy.

RECOMMENDATION FOR ITEM J:

The district should comply with its approved travel policy.

FINDING 2: **The district had deficiencies in purchasing procedures**

Our examination of purchasing procedures revealed the following deficiencies:

- A. Sales tax was routinely paid on credit card purchases. District purchases are exempt from state sales tax.

- B. The district incurred finance charges (\$199.18), late payment fees (\$366.96), and fees for membership (\$190). The district's bank account had sufficient funds to pay the credit card bills each month; therefore, there was no reason to incur finance charges, late payment fees, or utilize credit cards that charge a membership fee.
- C. In several instances, the district director purchased personal items with the district's credit card or through a PayPal account linked to the district's checking account and subsequently reimbursed the district for the purchases.
- D. In at least one instance, a Sam's Club reward check totaling \$723.59 was not deposited. The district used the reward check to purchase items from Sam's Club; however, no documentation of items purchased was provided. Therefore, we could not determine if the items were for the benefit of the district.
- E. During the period examined, the district had expenditures totaling \$1,175.72 for website maintenance for two organizations outside of district purposes. These two websites are managed by the district director for the Upper Cumberland 911 Directors Association and the 911 Winter Workshop.

The Upper Cumberland 911 Directors Association was invoiced in May 2017 by the district for services beginning September 2011. The district was reimbursed by the Upper Cumberland 911 Directors Association in May 2017 (\$776.34) for services noted during the period examined. The Upper Cumberland Directors Association has managed the website independently since May 2017.

- F. The district was reimbursed by the 911 Winter Workshop in June 2016 (\$399.38) for website maintenance and other services noted during the period examined. The 911 Winter Workshop is a nonprofit organization with four board members, including the district director and the district director's wife. The 911 Winter Workshop has since been removed from the district's account after the invoice was paid in full. In at least one instance, the district purchased items for the 911 Winter Workshop and was subsequently reimbursed.
- G. In at least two instances, the district director created invoices in the name of a vendor for the purchase and subsequent service of an ice machine. We determined that the vendor provided the ice machine and service. This practice could result in the district paying for expenses not incurred.
- H. The district is a training center with the American Safety and Health Institute (AHSI). There are several instructors affiliated with the training center within Overton and Pickett Counties. The district was invoiced for instructor renewal fees, certification cards, and various program packages totaling \$3,450.90 for the period examined. We noted reimbursement revenue for the period examined totaling \$1,331; however, we are unable to determine if all instructors are reimbursing the district for their fees or certification cards.

The district does not keep a record of certification classes taught by instructors nor the number of certification cards issued. Therefore, we were also unable to determine how many classes are offered by instructors and the number of students that attend and are

subsequently certified to reconcile with the number of cards ordered. Therefore, the district had purchases totaling \$2,119.90 for ASHI instructor fees, certification cards, packages, and other training materials not reimbursed. We question the amount of unreimbursed ASHI fees as allowable use of district funds.

- I. The district issues electric permits and collects associated fees. Appropriate fees are remitted to the state and an additional fee of \$5 is retained by the district. During the period examined, the district had various disbursements not directly related to district services. These include carpenter pencils and sharpeners as well as cellular phone service for the electric inspector who was a former board member.
- J. The district purchased a bee response suit (\$162.69) in November 2015 and sought reimbursement for the purchase from Overton County in September 2017. The director advised that the reimbursement request was submitted after questions from investigators about the use of the bee response suit at the emergency communications district.
- K. Our investigation noted a credit card charge of \$1,174.32 for a SoloShot camera and related equipment in December 2015. The district had not received the ordered item and requested and received a full refund in October 2017 after questioned by investigators.
- L. In at least one instance, the district disbursed funds totaling \$151.09 to the Tennessee College of Applied Technology for books assigned to a student not employed at the district. The district was subsequently reimbursed by the City of Livingston.

RECOMMENDATION:

- A. State sales tax should not be paid on district purchases.
- B. Invoices should be paid on a current basis to avoid finance charges and late fees.
- C. Personal items should not be purchased with district funds.
- D. Detailed documentation should be on file for all purchases.
- E. Expenditures should be only for items used exclusively in the operation of the district.
- F. Expenditures should be only for items used exclusively in the operation of the district.
- G. Original invoices should be on file for all purchases.
- H. Detailed documentation should be on file for all training center classes and participants.
- I. Expenditures should be only for items used exclusively in the operation of the district.
- J. Expenditures should be only for items used exclusively in the operation of the district.
- K. Receiving documentation should be on file for all purchases.
- L. Expenditures should be only for items used exclusively in the operation of the district.

FINDING 3: Inventory records were not maintained

The district did not maintain records for assets owned by the district. Generally accepted accounting principles require accountability for all district-owned assets, such as vehicles,

furniture, and equipment. The failure to maintain inventory records may result in a loss of control over assets.

RECOMMENDATION:

District officials should maintain inventory records for all district-owned assets.

FINDING 4: The district board did not provide adequate oversight of the district's operations

The district's board did not provide adequate oversight of the district's operations and did not establish internal controls to ensure accountability of district funds. The minutes of the board did not reflect any discussion of major spending related to food purchases, miscellaneous credit card purchases, or travel advances. Board members did not review or question credit card transactions. The lack of oversight by board members contributed to the failure to properly account for district funds.

RECOMMENDATION:

The district board should provide proper oversight of the district's operations and the establishment of adequate internal controls to ensure the district complies with applicable laws, rules, and regulations. Minutes of board meetings should adequately document the business conducted by the board.

THIS PAGE LEFT BLANK INTENTIONALLY.

APPENDIX

THIS PAGE LEFT BLANK INTENTIONALLY.

Exhibit 2

Date	Item	Amount		Date	Item	Amount
07/01/15	Nestle Pure Life Water	\$43.78		10/22/15	Nestle Pure Life Water	\$19.90
07/31/15	Tropicana 100% Org	13.68		10/22/15	Mars Halloween Box	19.98
07/31/15	Lipton Green Citrus	9.48		10/22/15	Nestle Mix Ups	14.84
07/31/15	100% Welchs AP/OR/GR	12.98		10/22/15	Mars Mix Minis 62 oz	12.84
07/31/15	Welchs FP/OR/GR	9.98		10/22/15	Hershey Pirate Bag	39.96
07/31/15	Nestle Pure Life Water	35.82		10/22/15	Dum Dum Pops 500 Ct	23.04
07/31/15	Gatorade Citrus Vrtty	12.98		11/22/15	Deluxe Mixed	13.98
09/09/15	Kraft Mayo Gal	8.76		11/22/15	Smoked Almonds	9.48
09/09/15	Country Crock Spread	10.96		10/30/15	Child's Playtime Mix	19.96
09/09/15	Pam Canola Spray	14.94		10/30/15	Factory Favorites	25.08
09/09/15	Wesson Canola Oil	23.94		10/30/15	Dubble Bubble B Gum	6.88
09/09/15	Dry Roasted Peanuts	7.98		10/30/15	Mars Choc vty 135 Ct	25.96
09/09/15	Muffins	14.96		10/30/15	Mars Mix Minis 62 oz	12.84
09/09/15	Salt	1.28		11/04/15	Country Crock Spread	10.96
09/09/15	UTZ Pretzel Treats	6.99		11/04/15	Merchandiser Drink	1.78
09/09/15	Tropicana 100% Org	13.68		11/04/15	Tropicana 100% Org	13.68
09/09/15	Picnic Pack	8.74		11/04/15	Powerade Vp	8.98
09/09/15	Slim Jim Original	53.91		11/18/15	Italian Green Beans	7.96
09/09/15	Dubble Bubble B Gum	6.88		11/18/15	Baked Beans	5.98
09/09/15	Sparkling Ice Vp	10.98		11/18/15	Domino Gran Sugar	4.83
09/09/15	Butter Lover's	7.48		11/18/15	Dale's Marinade 64 oz	8.48
09/09/15	Nestle Pure Life Water	75.62		11/18/15	Shells & Cheese Box	9.48
09/09/15	Fancy Cashew	13.98		11/18/15	Super Sweet Corn	7.96
09/09/15	Deluxe Mixed	15.98		11/18/15	Yeast Dinner Rolls	11.96
09/09/15	Pecan Halves	25.96		11/18/15	Sparkling Ice Vp	10.98
09/09/15	Shelled Walnuts	27.96		11/18/15	Nestle Pure Life Water	39.80
09/09/15	Hllwn Cheese Balls	6.99		11/18/15	Tossed Salad	3.96
09/09/15	Pumpkin Spice Crmr	5.32		11/18/15	Club Crackers	5.98
09/09/15	Gatorade LL/FP/OR	12.98		11/18/15	Flash Chill Tea Kit	9.91
09/09/15	Lance Toast Chee	13.76		11/18/15	NG Chicken Broth	5.48
09/09/15	DC PB Pretzels	11.96		12/08/15	Italian Green Beans	11.94
09/09/15	Sparkling Ice FB	21.96		12/08/15	Country Crock Spread	21.92
09/09/15	Propel VP	19.96		12/08/15	Cut Green Beans	7.36
09/09/15	Lipton Peach Tea	9.48		12/08/15	Salt Packets	1.98
09/09/15	Gatorade CB/GR/STRW	12.98		12/08/15	Pepper Packets	5.96
10/22/15	UTZ Pretzel Treats	13.98		12/08/15	Domino Gran Sugar	11.99
10/22/15	Child's Playtime Mix	19.96		12/08/15	Salt	1.28
10/22/15	Airheads Asstd Flvrs	10.15		12/08/15	Real Mashed Potatoes	11.96
10/22/15	Factory Favorites	25.08		12/08/15	DC Nacho Chz 106 oz	6.58
10/22/15	Dubble Bubble B Gum	6.88		12/08/15	DC Ched Chz 106 oz	6.58
10/22/15	Hershey Minis Yellow	12.48		12/08/15	Super Sweet Corn	15.92
	Subtotals	\$693.60				\$516.37

Date	Item	Amount		Date	Item	Amount
12/08/15	Sour Cream	\$ 12.28		12/30/15	Lance Toast Chee	\$ 6.88
12/08/15	French Fried Onions	4.47		12/30/15	Sparkling Ice FB	10.98
12/08/15	Brown Sugar	4.73		12/30/15	Propel Vp	9.98
12/08/15	Crumbled Bacon	19.96		02/05/16	Mixed Nuts w Peanuts	15.98
12/08/15	Fancy Shredded	25.96		02/05/16	Beanee Weenies	10.18
12/08/15	Fudge Brownie	9.48		02/05/16	Cashew Halves & PCS	17.98
12/08/15	Yeast Dinner Rolls	35.88		02/05/16	Chicken Ramen	6.87
12/08/15	Nestle Pure Life Water	15.92		02/05/16	Vienna Sausage	8.68
12/08/15	DC Elbows	6.48		02/05/16	Totinos Pizza Roll	8.98
12/08/15	Cream of Chicken	11.96		02/05/16	Olive Oil Chip	5.98
12/08/15	Mini Cream Puff	6.98		02/05/16	Pub Mix	7.48
12/08/15	Steamable Broccoli	29.90		02/05/16	Mini Choc Donuts	6.64
12/08/15	Rey Foil Hvy Duty 2 PK	14.38		02/05/16	Duchess Honey Bun	5.98
12/08/15	Bag N Bag Mix Fruit	12.98		03/08/16	Wesson Vegetable Oil	7.38
12/08/15	Com Pantry Pack	7.48		03/08/16	Country Crock Spread	4.98
12/08/15	Hellmann's Mayo	8.88		03/08/16	HZ Ketchup	7.68
12/08/15	7.5 Dozen Large Eggs	16.72		04/09/16	A.1.Steak Sauce	7.98
12/08/15	DC Ylw Round Chip	7.92		04/09/16	YooHoo	9.48
12/08/15	Red Velvet	9.98		04/09/16	100% Tropicana Org	13.68
12/08/15	Velveeta Original	24.96		04/09/16	Deluxe Pecan Pie	5.38
12/08/15	Dessert Bar Tray	14.98		04/09/16	DC Chicken Breast	11.28
12/08/15	Belgian Mini Pastrie	16.98		04/09/16	DC PB Pretzels	11.88
12/08/15	Ritz Crackers 61 oz	6.88		04/09/16	Mini Brownie Bites	6.98
12/08/15	French Fried Onions	6.98		04/09/16	Loaf Cake Variety	6.98
12/08/15	NG Chicken Broth	10.96		04/09/16	Cream Cheese Danish	8.88
01/10/16	Mixed Nuts W Peanuts	15.98		04/09/16	Mini Choc Donuts	6.64
01/10/16	Muffins	23.76		04/09/16	Mini Sugar Donuts	6.88
01/10/16	Animal Cracker Jug	5.98		04/09/16	Duchess Honey Bun	5.98
01/10/16	Deluxe Mixed	13.98		03/30/16	Animal Cracker Jug	5.98
01/10/16	Lance Toast Chee	13.76		03/30/16	HZ Ketchup	7.68
01/10/16	DC PB Pretzels	19.11		03/30/16	Lance Toast Chee	6.88
01/10/16	Slim Jim Original	38.96		03/30/16	DC PB Pretzels	5.94
01/10/16	Duchess Honey Bun	17.94		05/19/16	YooHoo	9.48
12/30/15	YooHoo	9.28		05/19/16	Deer Park Water	5.98
12/30/15	100% Tropicana Org	13.68		05/19/16	100% Tropicana Org	12.98
12/30/15	El Virginia Peanuts	7.98		05/19/16	Powerade VP	8.98
12/30/15	4Pk Cookie Tin	4.91		06/13/16	Sour Cream	4.28
12/30/15	Sparkling Ice Vp	10.98		07/05/16	A1 Steak Sauce	7.98
12/30/15	Powerade VP	12.48		07/05/16	Country Crock Spread	4.98
12/30/15	Nestle Pure Life Water	23.88		07/05/16	FR Mustard	4.88
12/30/15	DC Chicken Breast	19.96		07/05/16	HV Ranch Dressing	9.98
	Subtotals	\$596.70				\$340.65

Date	Item	Amount	Date	Item	Amount
07/05/16	CT Lemonade	6.98	10/04/16	Jif Creamy PB	9.28
07/05/16	Lance Toast Chee	6.88	10/04/16	HV Ranch Dressing	9.98
07/05/16	DC PB Pretzels	5.94	10/04/16	HZ Ketchup	7.68
07/25/16	Iceberg Lettuce	1.98	10/04/16	Lance Variety Pack	8.98
07/25/16	Fully Cooked Bacon	21.96	10/04/16	Deer Park .5L Water	14.94
07/25/16	Dubble Bubble Gum	6.88	10/04/16	Ruffles CHDR Sourcrm	4.98
07/25/16	Lance Toast Chee	6.88	10/04/16	Ruffles Original BB	4.98
07/25/16	Texas Toast	4.08	10/25/16	Vietti Chili	5.52
08/09/16	Deer Park Water	23.92	10/25/16	Dry Roasted Peanuts	7.98
08/09/16	Aquafina	7.96	10/25/16	UTZ Cheese Balls	6.82
08/09/16	HZ Organic Ketchup	7.48	10/25/16	DC Nacho Chz 106 oz	6.98
09/08/16	Doublemint Prepriced	7.14	10/25/16	Heinz Picnic Pack	8.78
09/08/16	Hershey PayDay	41.34	10/25/16	Classic Variety Pk	12.78
09/08/16	Hershey's Kisses	12.48	10/25/16	Hamp inshell peanut	5.88
09/08/16	York Peppermint Disk	13.48	10/25/16	Fancy Shredded	12.98
09/08/16	D Chef Jelly Beans	10.98	10/25/16	Honey Maid Grahams	7.68
09/08/16	Lance Toast Chee	6.88	10/25/16	shelled pistachios	19.98
09/08/16	Lance Toasty Cracker	6.88	10/25/16	Swiss Miss milk Choc	5.86
09/08/16	Pumpkin Pecan Loaf	7.98	10/25/16	D Chef Jelly Beans	11.92
09/08/16	MM Water	6.68	10/25/16	Fancy Cashew	14.98
09/08/16	Pumpkin Yogurt	7.98	10/25/16	Deluxe Mixed	13.98
09/02/16	Lance Toast Chee	6.88	10/25/16	Lance variety pack	8.98
09/02/16	DC PB Pretzels	11.88	10/25/16	DC PB Pretzels	6.48
09/02/16	Pub Mix	7.48	10/25/16	Halloween cupcakes	15.96
09/02/16	Cheez-It Sandwich	5.91	10/25/16	DC Ylw Round Chip	7.92
09/08/16	Muffins	7.98	10/25/16	Pub Mix	7.48
09/08/16	Hellman's Mayo	8.88	10/25/16	Halloween party pack	19.82
09/08/16	Deer Park .5L Water	19.92	10/28/16	Nestle Mix ups	74.20
09/08/16	Bob's Sweet Stripes	7.98	10/28/16	Mars Mixed Miniature	38.52
10/19/16	UTZ Pretzel Treats	6.98	10/31/16	Deer Park 8 oz Water	5.98
10/19/16	Child's Playtime Mix	43.52	10/31/16	Deer Park .5L Water	24.90
10/19/16	Factory Favorites	25.08	11/17/16	Lance Nektot	6.88
10/19/16	Dubble Bubble B Gum	13.96	11/17/16	Deer Park .5L Water	9.96
10/19/16	Hllwn Cheese Balls	6.98	12/08/16	Deer Park 8 oz Water	5.98
10/19/16	Nestle Mix ups	29.68	12/08/16	Deer Park .5L Water	14.94
10/19/16	Skit/Strbrst 215 ct	38.94	11/29/16	Deer Park .5L Water	19.92
10/19/16	Dum Dum Pops 500 Ct	12.25	12/21/16	HZ Ketchup	7.68
09/26/16	Animal Cracker Jug	5.98	12/21/16	Lance Nektot	6.88
09/26/16	Lance Toast Chee	6.88	12/21/16	Lance Toast Chee	6.88
09/26/16	Deer Park .5L	19.92	12/21/16	Deer Park .5L	14.94
09/26/16	Cheez-It Sandwich	5.91	12/21/16	Lance Toasty Cheddar	6.88
		\$515.75			\$514.12

Date	Item	Amount
01/11/17	A1 Steak Sauce	7.98
01/11/17	HZ Ketchup	7.68
01/11/17	Crisco Vegetable oil	7.98
01/11/17	Lance Nekat	6.88
01/11/17	Lance Toast Chee	6.88
01/11/17	Deer Park .5L Water	29.88
01/11/17	Lance Toasty Cheddar	6.88
02/01/17	M&M's milk chocolate	10.48
02/01/17	Peanut M&M's	10.48
02/01/17	Cream Puff & Eclairs	8.98
02/10/17	Dubble Bubble B Gum	6.98
02/10/17	Deer Park .5L Water	29.88
02/10/17	Bob's Sweet Stripes	7.98
		148.94
	Total	<u>\$3,326.13</u>

Exhibit 3

Date	Item	Amount		Date	Item	Amount
07/01/15	Tablecover 54X108	\$4.78		04/09/16	Rectangular Bev. Tub	\$39.98
07/31/15	Red Cup 18 oz	10.68		03/30/16	Cutlery Fork Hvy Wt	8.98
07/31/15	Bowl 20 oz	19.94		05/25/16	Cutlery Fork Hvy Wt	8.98
07/31/15	DC 10 1/16 In Plate	27.72		07/05/16	Cutlery Fork Hvy Wt	8.98
09/09/15	Cutlery Fork Hvy WT	26.94		07/05/16	White Spoon	9.97
09/09/15	DX 10 1/16 IN Plate	44.58		07/05/16	8 oz Foam cup	13.72
09/09/15	Bowl 20 oz	29.91		07/05/16	DX 10 1/16 IN Plate	14.83
11/22/15	8' Folding Table	639.04		07/05/16	Bowl 20 oz	9.97
11/04/15	Cutlery Fork Hvy Wt	26.94		07/25/16	Cutlery Fork Hvy Wt	8.98
11/04/15	Chinet Plate 10 3/8"	17.82		07/25/16	White Spoon	9.97
11/04/15	DC 10 1/16 In Plate	41.58		07/25/16	DC 10 1/16 In Plate	13.86
11/18/15	White Spoon	9.97		08/23/16	6 7/8 in plate	11.96
11/18/15	Serving Spoons	3.49		08/23/16	Bowl 20 oz	9.97
11/18/15	Full Steamtable Pan	8.78		08/23/16	DC 10 1/16 In Plate	13.86
11/18/15	Half Steamtable Pan	6.58		09/08/16	6 7/8 in plate	11.96
12/08/15	Cutlery Fork Hvy WT	8.98		09/08/16	DX 10 1/16 IN Plate	14.83
12/08/15	Cutlery Combo Pack	9.96		09/08/16	Bowl 20 oz	9.97
12/08/15	Tablecover 54X108	9.94		10/20/16	Cutlery Fork Hvy Wt	8.98
12/08/15	Chinet Platter	31.26		10/20/16	DC 10 1/16 In Plate	13.86
12/08/15	Chafing Fuel 6 hr	14.97		10/25/16	Clear Nacho Tray	4.74
12/08/15	Carryout 3 Comp Foam	8.98		10/25/16	5" fold n half table	39.88
12/08/15	Serving Spoons	13.96		10/25/16	DC 10 1/16 In Plate	41.58
12/08/15	Full Steamtable Pan	17.56		11/17/16	Bowl 20 oz	9.97
12/08/15	Full Steamtable Lid	13.16		12/08/16	Chinet Platter	31.26
12/08/15	Small Serving Tongs	4.58		12/08/16	Carryout 3 Comp Foam	8.98
12/08/15	Holiday Napkin	15.28		12/08/16	Full steamable pan	8.38
12/08/15	Holiday 10 in Plates	15.92		12/08/16	Half steamable pan	6.28
12/08/15	Vibrant Cups	7.72		12/08/16	1/2 steamable lid	5.58

Date	Item	Amount	Date	Item	Amount
01/10/16	Cutlery Fork Hvy Wt	17.96	12/08/16	Tablecover 54x108	7.97
01/10/16	Red Cup 18 oz	9.98	12/08/16	Vibrant Holiday cups	8.48
01/10/16	Carryout 3 Comp Foam	8.98	12/23/16	Cutlery Fork Hvy Wt	8.98
01/10/16	Bowl 20 oz	19.94	12/23/16	6 7/8 in plate	11.94
01/10/16	DC 10 1/16 In Plate	41.58	12/23/16	DX 10 1/16 IN Plate	14.83
02/05/16	Bowl 20 oz	29.91	12/23/16	Bowl 20 oz	9.97
02/05/16	DC 10 1/16 In Plate	13.86	01/11/17	Bowl 20 oz	9.97
03/09/16	White Spoon	9.97	01/11/17	DC 10 1/16 In Plate	13.86
04/09/16	Tablecover 54x108	4.97	02/10/17	Cutlery Fork Hvy Wt	8.98
04/09/16	Serving Spoons	3.49	02/10/17	Bowl 20 oz	9.97
04/09/16	Bowl 20 oz	19.94			
04/09/16	DC 10 1/16 In Plate	27.72			
04/09/16	3 tier server	19.98			
	Subtotals	<u>1,319.30</u>			<u>505.21</u>
				Total	<u>\$1,824.51</u>

Exhibit 4

Date	Item	Amount
11/22/15	Motrin IB	\$13.98
11/22/15	Alka-Seltzer Plus	9.98
11/22/15	Excedrin Migraine	15.18
11/22/15	First Aid Kit	19.98
11/22/15	Tums Ultra 1000	19.96
11/22/15	Tylenol Caplet	15.95
11/22/15	Centrum Silver	19.98
11/22/15	Advil Tablets	17.48
11/22/15	Dayquil/Nyquil Combo	16.48
11/22/15	Mucinex Max DM	51.96
11/22/15	Aleve Caps	16.97
11/22/15	NM Magnesium 400MG	12.38
11/22/15	Band-Aid Family Back	19.96
11/22/15	Airborne Chewables	16.48
11/22/15	MM ES Omega 3 Krill	23.48
11/22/15	MM Vitamin C 1000MG	13.96
11/22/15	MM Cinnamon Cinsulin	18.58
09/26/16	Alka-Seltzer	10.98
10/28/16	Tylenol Caplets	35.92
10/28/16	Advil Tablets	39.92
10/28/16	Neosporin 3 pack	9.98
10/28/16	Band-Aid Family Pack	<u>9.98</u>
	Total	<u>\$429.52</u>