

METROPOLITAN GOVERNMENT OF NASHVILLE AND DAVIDSON COUNTY



March 4, 2016

Kent Wall, Administrator of Elections
Davidson County Election Commission
1417 Murfreesboro Pike
Nashville, Tennessee 37217

Dear Mr. Wall:

Please find attached the preliminary monitoring report on the Davidson County Election Commission's use of Metro credit cards. This report explains the results of our review of delegated purchasing authority and VISA and MasterCard credit card transactions from July 1, 2012 through January 31, 2016. Staff from the Office of Financial Accountability conducted the fieldwork for this review during the weeks of February 1st and February 8th 2016.

Please review and respond to each finding on or by March 14, 2016. Each response should include a statement of agreement or disagreement, indicated by stating one of the following: "We concur," "We concur in part," or "We do not concur." Upon receipt in our office, these responses will be incorporated in the final report in the section entitled "Management's Comments."

We appreciate your cooperation and assistance during the review. If you have any questions, please call me at (615) 880-1035.

Sincerely,

Fred Adom, CPA, CGMA, CICA
Director, Office of Financial Accountability

cc: James DeLanis, Chairman, Davidson County Election Commission

Tricia Herzfeld, Commissioner, Davidson County Election Commission
Jennifer Lawson, Commissioner, Davidson County Election Commission
A.J. Starling, Commissioner, Davidson County Election Commission
Jesse Neil, Commissioner, Davidson County Election Commission
Joan Nixon, Chief Deputy Administrator, Davidson Co. Election Commission
Bill Hyden, Finance Manager, Davidson County Election Commission
Talia Lomax-O'dneal, Director of Finance, Department of Finance
Gene Nolan, Deputy Director of Finance, Department of Finance
Kim McDoniel, Chief of Accounts, Department of Finance
Tom Eddlemon, Metropolitan Treasurer, Department of Finance
Mark Swann, Metropolitan Auditor, Office of Internal Audit
Kevin Brown, CMFO, CICA, Office of Financial Accountability
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Aaron Davis, CICA, Office of Financial Accountability



◆ Monitoring Report of ◆

Davidson County Election Commission

Conducted by



Office of Financial Accountability

March 4, 2016

MONITORING REPORT

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INTRODUCTION

The Office of Financial Accountability (hereinafter referred to as “OFA”) has completed a credit card review of the Davidson County Election Commission’s compliance with the *Metro Code of Law Title 4, Procurement Code* and compliance with the *Metro Finance Policy #19: Credit Card Policy*.

A review is substantially less in scope than an audit. The OFA did not audit the financial statements and, accordingly, does not express an opinion or any assurances regarding the financial statements of Metro or any of its component units.

The OFA is responsible for the internal monitoring of Metro agencies that receive federal and state financial assistance, including cooperative agreements and non-profit organizations that receive appropriations from Metro government. The OFA also conducts prompt pay performance, delegated purchasing authority, and procurement reviews, including credit card usage by Metro departments. In summary, any agreement that imposes performance and/or financial requirements on Metro government is subject to review by the OFA.

Agency Background

The Davidson County Election Commission is responsible for providing free and fair elections to every eligible citizen. The Election Commission consists of five (5) commissioners appointed by the State Election Commission who serve a two (2) year term. The commission appoints the Administrator of Elections, who serves as the county’s Chief Election Administrator. The Election Commission is responsible for approving election plans and certifying the election results; while, the Administrator of Elections is responsible for voter registration records and voting histories for each voter are maintained and provides information concerning voter registration, absentee voting, election results, and campaign financial disclosures.

OBJECTIVES, SCOPE AND METHODOLOGY

The scope of the credit card review period covered July 1, 2012 through January 31, 2016. There were five (5) cardholders in the Election Commission during the review period. See the table below for details:

Cardholder	Time Period	Number of Transactions	Dollar Value of Transactions
CARDHOLDER A	9/2012 – 1/2014	7	\$515.95
CARDHOLDER B	7/2012 – 11/2012	10	\$799.78
CARDHOLDER C	7/2012 – 4/2013	19	\$1,352.88
CARDHOLDER D	6/2013 – 1/2016	80	\$11,145.02
CARDHOLDER E	1/2014 – 1/2016	162	\$21,493.23
Totals		278	\$35,306.86

The Office of Financial Accountability reviewed one hundred percent (100%) of the credit card activity.

The objectives of our review were:

- 1) To determine the agency’s compliance with M.C.L. Title 4, Procurement Code.
- 2) To determine the agency’s compliance with Metro Finance Policy #19: Credit Cards.
- 3) To determine whether credit card expenditures were allowable and necessary.
- 4) To determine whether purchasing transactions were authorized and sufficiently documented.
- 5) To determine whether the agency has adequate and effective internal controls over its credit card program.

Our review procedures included meeting with agency management and staff, reviewing internal controls over credit card use, and examining certain financial records and supporting documentation to ensure compliance with requirements set forth in Metro’s official procurement policies. Specific procedures included:

- Comparing credit card charges with original receipts, supporting documentation and travel authorizations.
- Reviewing supporting documentation for accuracy, necessity and reasonableness.
- Identifying split purchases and unauthorized or fraudulent transactions.
- Investigating discrepancies and following up as necessary.

RESULTS OF REVIEW

Overall Findings and Major Review Highlights

Our review revealed the following issues of non-compliance with M.C.L. Title 4, Procurement Code and Metro Finance Policy #19: Credit Card. The Davidson County Election Commission:

1. Improperly used Metro credit card for non-business (personal) items,
2. Improperly purchased personal items imbedded in legitimate business transactions,
3. Failed to adequately document the business purpose of the transactions,
4. Could have managed some business purchases more efficiently,
5. Failed to exercise exempt status by improperly paying sales tax,
6. Failed to maintain adequate supporting documentation, and
7. Improperly obtained reimbursement for other non-credit card related transactions.

The section that follows provides more detailed information for the items listed above. Management is given an opportunity to respond to the findings.

FINDINGS AND RECOMMENDATIONS

1. Improperly used Metro Credit Card for non-business (personal) transactions.

Finding

Based on testwork completed, the Davidson County Election Commission improperly used the Metro credit card to purchase items which appear to have been personal in nature and not for authorized Metro business. The charges included unsupported charges for meals; charges for personal items; charges for luncheons with an organization affiliated with a specific political party; and unallowable charges from department stores. Our review revealed forty-two (42) transactions that appeared to be have been for personal use, twenty-six (26) were transactions at local restaurants during lunch and dinner time, ten (10) were associated with an organization affiliated with a political party, and six (6) were to department stores for personal items. See Table 1 in the Appendix for the detailed listing of transactions.

Per Metro Finance Policy #19: Credit Card Section 3) Expectations of Cardholders c) "Use of the credit card for personal expenses is a misappropriation of Metro Funds. Any use of the credit card for personal expenses will result in cancellation of the card and may result in disciplinary action. Any cardholder who uses the card for personal charges will be barred from future use of a Metro card." In addition, per the Metro Credit Card Cardholder Responsibility Acknowledgement that details the responsibilities of the cardholder, for which is reviewed and signed by the cardholder prior to taking physical possession of the Metro credit card, states "I will not use the card for any non-Metro purpose including personal expenses."

a. Unsupported Charges for Meals

The supporting documentation provided for the twenty-six (26) transactions totaling \$765.91, at local restaurants, were only charge slips and not the detailed sales receipt indicating the items purchased. In addition to just the charge slips, the hand written notation provided to justify the transactions included "recruiting", "recruiting poll official", and/or "recruiting election trainer". *Metro Finance Policy #19: Credit Cards Section 3) Expectations of Cardholders, "b) Cardholders should collect and maintain proper sales receipts and invoices to support all charges. Proper sales receipts should include adequate description of the items purchased and the individual benefiting (when applicable). Credit card charge slips are **not** sufficient support."* Metro Finance Policy #19 further states under Section

6) *Documentation Requirements, “b) Use of the Metro credit card for meals at local restaurants is generally not allowable. When charges for meals at local restaurants are necessary, the cardholder shall maintain detailed documentation to justify the charges. The documentation at a **minimum** include detailed information such as (a) the list of individuals that participated/attended the meeting/luncheon, (b) time, (c) place, (d) and an agenda or document that describes the business purpose of the meeting and meal.”* As a result of insufficient supporting documentation, it was determined that the twenty-six (26) transactions were personal, unauthorized and an unallowable use of Metro funds.

b. Charges for luncheon with Organizations with Political Affiliations

Ten (10) personal transactions, totaling \$452.74, were to an organization associated to a specific political party to attend monthly luncheons and/or night meetings at local restaurants. The commission staff attended monthly meetings of the Nashville Republican Women’s Club (NWRWC). The OFA was advised by the Commission staff that these outreach efforts were intended to recruit poll workers to ensure balanced representation at polling stations; however, the charges on the card even for such events are not permissible. The OFA could not find other expenditures to any organizations associated with other political parties.

The Davidson County Election Commission is responsible for providing free and fair elections to every eligible citizen. Per the delegated purchasing authority granted to the Election Commission, the Election Commission shall use the credit card for *“non-contracted purchases made in compliance with M.C.L. Title 4, Procurement Code”*. Per the M.C.L. Title 4, Procurement Code, Chapter 4.48.030 – *General standards of ethical conduct section A, “General Standards for Employees. Each employee of the metropolitan government shall avoid any action, whether or not specifically prohibited by this code, which might result in, or create the appearance of: 2)giving preferential treatment to any person, 4) losing complete independence or impartiality, or 6) affecting adversely the confidence of the public in the integrity of the government.”*

c. Unallowable Purchases from Department Stores

Six (6) transactions, totaling \$384.19, were to department stores that included items such as a cell phone car charger, desktop docking station for an iPhone/iPod, a WWE action figure, hot wheels car, Christmas cards, lamps, and other office accessories. The Election Commission failed to provide justification to establish the business purpose for the items purchased and as a result, the items were deemed to be personal. It was also noted that on the charge that included the WWE action figure and hot wheels car, that the cardholder also submitted an invoice seeking reimbursement for \$5.28 from Metro.

As a result, not only did the cardholder use a Metro credit card to complete the initial transaction for the personal items, the cardholder also received a reimbursement of Metro funds by submitting an invoice that implied that they used personal funds to make the initial purchase.

RECOMMENDATIONS

The Davidson County Election Commission should take immediate measures to ensure the responsible cardholder reimburse Metro Nashville Government for the total value of the personal transactions identified.

The Election Commission should also take the necessary steps to ensure that cardholders of a Metro Credit card comply with rules and regulations as stated within their Notice of Purchasing Delegation, the M.C.L. Title 4 Procurement Code, and Metro Finance Policy #19: Credit Card Policy, and the Cardholder Responsibility Acknowledgement Agreement.

The Election Commission should offer training to the department's cardholders on credit card use and to emphasize the potential that they can be held personally liable for their use of the Metro credit card for personal items charged to the card. Continued violations of the credit card usage regulations and policies shall result in the cancellation of their Metro credit card privileges and other disciplinary actions deemed appropriate.

The Election Commission should seek other alternatives to recruit poll workers to achieve the balance recommended for equal representation of political parties. Such efforts should not include direct purchases from organizations representing political parties or regular monthly meetings, to avoid the appearance of conflict of interest.

<Insert Management Comments>

2. Improperly purchased personal items imbedded in legitimate business transactions.

Finding

In addition to the forty-two (42) transactions mentioned in Finding #1, the OFA noted seventeen (17) transactions to Kroger that contained items purchased for both Metro business and personal use. The seventeen (17) transactions totaled \$1,459.38, of which \$798.39 were determined to be personal items. The personal items purchased included

but not limited to candy, gum, reading glasses, dental floss, toothpaste, toothbrushes, shoe polish, a shoe polish brush, peanuts, mixed nuts, peanut butter crackers, and armor car wipes. See table 2 in the appendix for a detailed listing of transactions in question.

Per Metro Finance Policy #19: Credit Card Section 3) Expectations of Cardholders c) "Use of the credit card for personal expenses is a misappropriation of Metro Funds. Any use of the credit card for personal expenses will result in cancellation of the card and may result in disciplinary action. Any cardholder who uses the card for personal charges will be barred from future use of a Metro card." In addition, per the Metro Credit Card Cardholder Responsibility Acknowledgement that details the responsibilities of the cardholder, for which is reviewed and signed by the cardholder prior to taking physical possession of the Metro credit card, states "I will not use the card for any non-Metro purpose including personal expenses."

RECOMMENDATION

The Davidson County Election Commission should immediately seek reimbursement, from the cardholder responsible, the total value of the personal transactions identified.

The Election Commission should also take the necessary steps to ensure that cardholders of a Metro Credit card comply with rules and regulations as stated within their Notice of Purchasing Delegation, the M.C.L. Title 4 Procurement Code, Metro Finance Policy #19: Credit Card Policy, and the Cardholder Responsibility Acknowledgement Agreement.

The Election Commission should take the necessary steps to ensure that cardholder's are held personally responsible for their use of the Metro credit card and that any violation of the credit card usage limitations or policies results in the cancellation of their Metro credit card privileges and any other disciplinary actions deemed appropriate.

<Insert Management Comments>

3. Failed to adequately document the business purpose of the transactions.

Finding

The Election Commission failed to adequately document the business purposes for forty (40) credit card transactions totaling \$5,608.81. The OFA noted that those transactions,

mainly to restaurants, appeared to be associated with catering of lunches and dinners for large groups of participants, without any indication of the business necessity for the expenditures.

*Per Metro Finance Policy #19: Credit Cards states under Section 5) Prohibited Uses, "a) The credit card generally should not be used to purchase meals unless the cardholder is on an approved travel status. (Please see the Travel Policy for details). When it is necessary to use the card for payment for a planned office event, the cardholder should ensure that there is proper documentation, approved by the Department or designee authorizing the use of the card." Metro Finance Policy #19 further states, under Section 6) Documentation Requirements, "b) Use of the Metro credit card for meals at local restaurants is generally not allowable. When charges for meals at local restaurants are necessary, the cardholder shall maintain detailed documentation to justify the charges. The documentation at a **minimum** include detailed information such as (a) the list of individuals that participated/attended the meeting/luncheon, (b) time, (c) place, (d) and an agenda or document that describes the business purpose of the meeting and meal."*

The OFA noted that on some occasions, the Election Commission maintained a listing of the participants; however, failed to include an agenda or documentation that described the business purpose of the lunch. For example, on October 14, 2015, a credit card was used to purchase a catered meal from Moe's Southwest Grill totaling \$210.97. The Election Commission provided a listing of individuals who participated, but the documentation for the business purpose only included "October 14, 2015, Moe's Program 1." Program 1 refers to the Administrative staff. After discussing the issue with Election Commission Staff, the OFA determined these transactions to be legitimate business expenditures but noted that the Election Commission needs to enhance its documentation to comply with Metro Finance Policy #19. See Table 3 in the appendix for a detailed listing of transactions.

RECOMMENDATION

The Election Commission should take the necessary actions to ensure that adequate documentation is maintained to support all credit card transactions. The documentation should include clear and concise notation to the business purpose of all transactions.

The Election Commission should ensure that at a minimum the following information is maintained to justify the business purpose of meals purchased from a local restaurant.

- a) the list of individuals that participated/attended the meeting/luncheon,
- b) time,

- c) place,
- d) an agenda or document that describes the business purpose of the meeting and meal.”

<Insert Management Comments>

4. **Could have managed some business purchases more efficiently**

Finding

The Election Commission utilized Metro credit cards to make thirty-nine (39) transactions for legitimate Metro business that could have been handled more efficiently. These transactions were mainly for the purchase of postage stamps and office supplies. The costs of postage for the Election Commission are budgeted and covered fully within the General Services Department Postal Services division’s budget. As a result there should not be any additional cost for the Election Commission’s mailings as long as the mailings are processed through the Metro Postal Service. This means postage charged to the Election Commission’s credit card for standard postage through the United States Postal Services were unnecessary.

The Election Commission utilized the credit card to purchase office supplies. While office supplies are a legitimate business expense, the purchase of office supplies with a metro credit card is a violation of metro policy. The Procurement Division within the Finance Department has secured a contract with a vendor for office supplies at a discounted rate. Therefore, while the purchasing of office supplies, off metro contract, may be for legitimate business, it could be wasteful by failing to take advantage of the discounted pricing that is available through the Metro contract. Per *Metro Finance Policy #19: Credit Cards 1) General Policies a) “the credit card can be used to purchase and make payment for approved transactions only including travel and related cost (hotels, car rentals, food, and ancillary items), petty cash type purchases, conference registrations, subscriptions and emergency purchases (as defined by the Purchasing Agent). **Note: All purchases are subject to established purchasing regulations. The credit card is not a payment/purchasing card and is not to be used for routine procurements from contracted suppliers.**”* See Table 4 for a detailed listing of the transactions in question.

In addition, the purchase of routine office supplies does not meet the definition of an emergency purchase as defined by the Purchasing Agent. Per the Procurement Division’s website, “*Emergency procurements may occur but only when there exists a threat to public health, welfare or safety. Any department head or other official who makes an emergency*

purchase without following the regulations of the standards board may be held personally liable for such purchase. (M.C.L. 4.12.070 Emergency procurements).

The existence of such condition creates an immediate and serious need for supplies, services, or construction that cannot be met through normal procurement methods and the lack of which would seriously threaten:

- a) the functioning of Metro government;*
- b) the preservation or protection of property; or*
- c) the health or safety of any person.*

Per R4.12.070.02 Definition of Emergency Conditions.

- All purchases are to be first attempted through existing contracts. If this attempt fails, when practical, at least two, and preferably three, competitive quotations are to be obtained, and the required supplies and/or services procured from the lowest responsive and responsible bidder able to respond within the emergency demands.*
- The requirements for sealed solicitations, standard public notice times, SMWBE participation, and labor workforce requirements may be waived. Emergency procurements, however, are made with as much competition as is practical under the circumstances.*
- Emergency procurements must be approved by the purchasing agent or their designee. If unavailable and the emergency demands immediate attention, the department head may make the determination but assumes liability for the action.*
- A written determination (Emergency Request Form) is required, preferably prior to the purchase but always must be submitted to the purchasing agent within one (1) Metro business day of the emergency. R4.12.070.04 Authority to Make Emergency Procurements.*

RECOMMENDATION

The Election Commission should take the appropriate measures to avoid incurring unnecessary postage charges. The Election Commission should take full advantage of the provision for postage set aside to cover the Commission's postal charges, by processing their mail through General Services Department Postal Services Division.

In cases as it is not practicable for the Election Commission to utilize Metro Postal Service, potentially due to time constraints, which should be rare, the Election Commission should ensure that the supporting documentation justifies the usage of the United States Postal Service.

The Election Commission should plan ahead and notify The General Services Department Postal Services Division of anticipated increases in postings, especially in an election year, to allow Metro Postal Services to make adequate provision and projection of the anticipated increase in postage.

The Election Commission should ensure that needed office supplies are purchased from the Metro contracted vendor. In the extraordinary circumstances that would necessitate the Election Commission to purchase off contract, the Election Commission should ensure compliance with the guidelines requirements for Emergency Purchases as required by M.C.L. 4.12.070 Emergency procurements.

<Insert Management Comments>

5. Failed to exercise exempt status by improperly paying sales tax.

The Election Commission improperly paid sales tax on sixty (60) transactions totaling \$414.58. Per *Metro Finance Policy #19 3) Expectations of Cardholders d) "Cardholders are also responsible for identifying and disputing erroneous charges, including Tennessee sales tax charges, to their assigned cards. It is the responsibility of the cardholder to dispute the charges as specified in the cardholder agreement."* In addition, *e) "Cardholders should not pay Tennessee sales tax. It is the cardholder's responsibility to dispute Tennessee sales tax charges."* See Table 5 in the appendix for a detailed listing of transactions.

RECOMMENDATION

The Election Commission should ensure that cardholders review and avoid charges for Tennessee sales tax. The Election Commission should also ensure that Metro credit card cardholders adhere to Metro Finance Policy #19.

<Insert Management Comments>

6. Failed to maintain adequate supporting documentation.

Finding

In addition to the previous findings for lack of adequate supporting documentation, the Election Commission made ten (10) other charges to the credit cards but failed to maintain any supporting documentation. There were no invoices and/or sales receipts on file to support these transactions. Without supporting documentation, the OFA was unable to determine the business purpose of these transactions. Per *Metro Finance Policy #19 Credit Cards 3) Expectations of Cardholders b) "Cardholders should collect and maintain proper sales receipts and invoices to support all charges. Proper sales receipts should include adequate description of the items purchased and the individual benefitting (when applicable). Credit card charge slips are not sufficient support."* See Table 6 in the Appendix for a detailed listing of the transactions without supporting documentation.

The OFA also noted sixty-six (66) transactions for which the supporting documentation was not signed or initialed by the cardholder. Cardholder's signature is a vital part of the necessary documentation to support the credit card charges. It serves two purposes, 1) it shows that the cardholder was in fact the person who used the card to complete the transaction and 2) it identifies the individual authorized the use of the credit card. Per *Metro Finance Policy #19 2) Card Authorization a) "Only the employee whose name is embossed on a credit card may use the card. No other person is authorized to use the card. The use of the card shall not be delegated to any other person. Cardholder shall use the credit card for Metro authorized purchases only."* In addition, per the *Metro Credit Card Cardholder Responsibility Acknowledgement*, "the card issued to me must not be used by anyone other than myself. (This includes other Metro employees)." See Table 7 in the Appendix for a detailed listing of the transactions without cardholder signature.

RECOMMENDATION

The Election Commission should ensure that cardholders maintain adequate supporting documentation to support credit card transactions.

The Election Commission should further ensure that the cardholders review and sign the credit card supporting documentation to ensure that no one other than the cardholder is utilizing the Metro credit card.

<Insert Management Comments>

7. Improperly obtained reimbursement for other non-credit card related transactions.

Finding

As a result of following up on some discrepancies in the credit card use , as detailed throughout the report, the OFA noted four (4) questionable transactions totaling \$148.26 which were processed and reimbursed to cardholders as payment vouchers.

The first payment voucher in question was identified in Finding #1, totaled \$5.28 and was associated with the use of a Metro Card in the purchase of a WWE action figure and hot wheels car. The cardholder paid for the initial transaction with the Metro credit card and then in turn submitted an invoice for reimbursement as if they had utilized their personal funds.

The second payment voucher in question, totaled \$29.00, was associated with the purchase of an on-line electronic subscription to a newspaper for their personal email address, which was claimed as reimbursement to the cardholder. The cardholder had already processed and Metro had already purchased an on-line electronic subscription to the same newspaper through the use of the Metro credit card for the cardholder's work email. Therefore, as a result of already having a paid subscription through Metro, the second subscription for the cardholder's personal email becomes a questionable and un-allowed use of Metro funds.

The remaining two (2) reimbursements totaling \$113.98 consisted of reimbursements identified as "recruiting"; however, review of the supporting documentation attached to the invoices did not contain sufficient documentation to justify the business purpose of the transactions. The OFA also noted that the only support attached to one of the invoices for reimbursement was a copy of a business check from a company owned by Cardholder E in the amount of \$65.00 for payment to "West Point Society of Middle Tennessee", an alumni group, to attend their "Founder's Dinner". Without the required minimum documentation, the invoice for reimbursement appears to be personal. See Table 8 for the detailed listing of the four (4) payment vouchers in question.

RECOMMENDATION

The Election Commission should take immediate action seek immediate reimbursement from the cardholders for the unallowed charges.

The Election Commission should ensure that at a minimum the following information is maintained to justify the business purpose of meals purchased from a local restaurant.

- a) the list of individuals that participated/attended the meeting/luncheon,
- b) time,
- c) place,
- d) an agenda or document that describes the business purpose of the meeting and meal.”

<Insert Management Comments>

In summary, the Election Commission should seek reimbursement from the cardholders listed below in the amount noted:

Cardholder	Amount
CARDHOLDER A	\$30.00
CARDHOLDER B	\$9.70
CARDHOLDER C	\$134.91
CARDHOLDER E	\$2,374.88

These amounts should be paid to Metro immediately.

Table 1 - Improper use of the Metro Credit Card for non-business (personal) transactions.

ACC.Account Name	MCH.Merchant Name	FIN.Transaction Date	FIN.Posting Date	FIN.Transaction Amount
a. Unsupported Charges for Meals				
CARDHOLDER E	CATIA EATERIES	09/29/2015	09/30/2015	4.81
CARDHOLDER E	CATIA EATERIES	10/13/2015	10/14/2015	8.74
CARDHOLDER E	CATIA EATERIES	11/02/2015	11/03/2015	8.74
CARDHOLDER E	DARFONS	04/11/2014	04/14/2014	16.11
CARDHOLDER E	DARFONS	04/16/2014	04/17/2014	30.67
CARDHOLDER E	DARFONS	05/28/2014	05/29/2014	26.94
CARDHOLDER E	DARFONS	06/17/2014	06/18/2014	28.04
CARDHOLDER E	DARFONS	09/25/2014	09/26/2014	29.94
CARDHOLDER E	DARFONS	11/17/2014	11/18/2014	33.37
CARDHOLDER E	DARFONS	12/03/2014	12/04/2014	11.74
CARDHOLDER E	DARFONS	12/08/2014	12/09/2014	26.94
CARDHOLDER E	DARFONS	12/18/2014	12/19/2014	27.49
CARDHOLDER E	DARFONS	01/09/2015	01/12/2015	35.59
CARDHOLDER E	DARFONS	02/11/2015	02/12/2015	30.22
CARDHOLDER E	DARFONS	04/06/2015	04/07/2015	20.93
CARDHOLDER E	DARFONS	07/13/2015	07/14/2015	33.41
CARDHOLDER E	DARFONS	08/20/2015	08/21/2015	22.48
CARDHOLDER E	DARFONS	09/22/2015	09/23/2015	25.17
CARDHOLDER E	DARFONS	10/08/2015	10/09/2015	29.04
CARDHOLDER E	DARFONS	11/05/2015	11/06/2015	11.74
CARDHOLDER E	DARFONS	11/18/2015	11/19/2015	33.41
CARDHOLDER E	JONATHAN'S GRILL	04/17/2014	04/21/2014	30.05
CARDHOLDER E	KRISPY KREME DOUGH	07/25/2015	07/27/2015	35.11

CARDHOLDER E	KRISPY KREME DOUGH	08/01/2015	08/03/2015	18.75
CARDHOLDER E	SAMS PLACE	10/20/2015	10/22/2015	63.24
CARDHOLDER E	SPERRYS RESTAURANT	06/30/2015	07/03/2015	123.24
				\$ 765.91
b. Charges for Luncheon/Dinner with Organizations with Political Affiliations				
CARDHOLDER A	PAYPAL	11/26/2013	11/27/2013	30.00
CARDHOLDER E	PAYPAL NRWC	05/07/2014	05/08/2014	105.00
CARDHOLDER E	PAYPAL NRWC	09/04/2014	09/05/2014	48.00
CARDHOLDER E	PAYPAL NRWC	09/04/2014	09/05/2014	48.00
CARDHOLDER E	PAYPAL NRWC	01/07/2015	01/08/2015	25.00
CARDHOLDER E	PAYPAL NRWC	04/22/2015	04/23/2015	32.00
CARDHOLDER E	DALTS AMERICAN GRILL	05/21/2015	05/25/2015	31.29
CARDHOLDER E	DALTS AMERICAN GRILL	09/17/2015	09/21/2015	38.90
CARDHOLDER E	DALTS AMERICAN GRILL	10/15/2015	10/19/2015	63.58
CARDHOLDER E	JONATHAN'S GRILL	09/18/2014	09/22/2014	30.97
				\$ 452.74
c. Unallowable Purchases from Department Stores				
CARDHOLDER E	APPLE STORE #R123	06/17/2015	06/19/2015	141.92
CARDHOLDER E	KATYS HALLMARK	12/03/2015	12/04/2015	49.16
CARDHOLDER E	KMART 3084	12/08/2014	12/10/2014	24.87
CARDHOLDER E	KMART 3084	06/26/2015	06/29/2015	13.19
CARDHOLDER E	MICHAELS STORES 9607	10/28/2014	10/29/2014	6.54
CARDHOLDER E	TJMAXX #0115	09/13/2014	09/15/2014	148.51
				\$ 384.19

Table 2 - Improperly purchased personal items while making legitimate business transactions.

ACC.Account Name	MCH.Merchant Name	FIN.Transaction Date	FIN.Posting Date	FIN.Transaction Amount	Amount of Personal Items
CARDHOLDER C	KROGER #511	07/31/2012	07/31/2012	\$ 44.56	\$ 26.69
CARDHOLDER C	KROGER #511	08/01/2012	08/01/2012	\$ 43.71	\$ 11.41
CARDHOLDER C	KROGER #511	11/02/2012	11/04/2012	\$ 70.87	\$ 70.87
CARDHOLDER C	KROGER #526	11/18/2012	11/19/2012	\$ 39.92	\$ 25.94
					\$ 134.91
CARDHOLDER E	KROGER #542	09/12/2014	09/15/2014	\$ 40.55	\$ 31.14
CARDHOLDER E	KROGER #542	10/14/2014	10/15/2014	\$ 210.98	\$ 37.35
CARDHOLDER E	KROGER #542	11/17/2014	11/18/2014	\$ 9.25	\$ 5.48
CARDHOLDER E	KROGER #542	12/03/2014	12/04/2014	\$ 120.95	\$ 76.83
CARDHOLDER E	KROGER #542	12/16/2014	12/17/2014	\$ 16.10	\$ 11.75
CARDHOLDER E	KROGER #542	12/31/2014	01/02/2015	\$ 34.92	\$ 31.96
CARDHOLDER E	KROGER #542	02/24/2015	02/25/2015	\$ 93.07	\$ 71.93
CARDHOLDER E	KROGER #542	04/22/2015	04/23/2015	\$ 72.45	\$ 51.07
CARDHOLDER E	KROGER #542	06/16/2015	06/17/2015	\$ 183.74	\$ 52.40
CARDHOLDER E	KROGER #542	07/06/2015	07/07/2015	\$ 221.30	\$ 57.91
CARDHOLDER E	KROGER #542	07/21/2015	07/22/2015	\$ 63.31	\$ 57.95
CARDHOLDER E	KROGER #542	08/26/2015	08/27/2015	\$ 183.27	\$ 168.01
					\$ 653.78
CARDHOLDER B	KROGER #542	11/04/2012	11/05/2012	\$ 10.43	\$ 9.70
					\$ 9.70

Table 3 - Failed to adequately document the transactions business purpose.

ACC.Account Name	MCH.Merchant Name	FIN.Transaction Date	FIN.Posting Date	FIN.Transaction Amount
CARDHOLDER C	SUBWAY 00117598	07/31/2012	07/31/2012	\$100.00
CARDHOLDER C	KRISPY KREME DOUGH	08/02/2012	08/02/2012	\$17.46
CARDHOLDER C	WHITTS BARBECUE	08/02/2012	08/02/2012	\$257.80
CARDHOLDER B	JET'S PIZZA WEST END	10/08/2012	10/09/2012	\$88.62
CARDHOLDER C	SUBWAY 00117598	10/30/2012	11/01/2012	\$125.00
CARDHOLDER B	JERSEY MIKES SUBS#4004B	11/01/2012	11/02/2012	\$86.89
CARDHOLDER C	DEMOS RESTAURANT 2	11/06/2012	11/08/2012	\$288.00
CARDHOLDER C	MICHAELS #9808	03/19/2013	03/21/2013	\$31.98
CARDHOLDER D	SUBWAY 00036236	09/28/2013	09/30/2013	93.60
CARDHOLDER D	KROGER #574	01/08/2014	01/09/2014	215.79
CARDHOLDER E	KROGER #574	01/29/2014	01/30/2014	72.93
CARDHOLDER E	PIZZA HUT	01/31/2014	02/03/2014	72.49
CARDHOLDER E	PIZZA HUT	03/06/2014	03/10/2014	140.43
CARDHOLDER E	DUNKIN #346212 Q35	04/12/2014	04/14/2014	39.28
CARDHOLDER E	DUNKIN #346212 Q35	04/19/2014	04/21/2014	34.92
CARDHOLDER E	DUNKIN #346212 Q35	04/26/2014	04/28/2014	34.92
CARDHOLDER D	PIZZA HUT	04/29/2014	05/01/2014	74.45
CARDHOLDER E	JERSEY MIKES SUBS #QPS	05/01/2014	05/02/2014	35.84
CARDHOLDER D	SUBWAY 03108883	05/04/2014	05/06/2014	53.56
CARDHOLDER E	WHITTS BARBECUE	05/12/2014	05/14/2014	135.85
CARDHOLDER E	WHITTS BARBECUE	07/09/2014	07/11/2014	170.98
CARDHOLDER D	JERSEY MIKES SUBS #QPS	08/02/2014	08/04/2014	38.75
CARDHOLDER E	PAPA JOHN'S #00085	08/23/2014	08/25/2014	88.50
CARDHOLDER D	PAPA JOHN'S #00076	10/30/2014	11/03/2014	22.00
CARDHOLDER E	PAPA JOHN'S #00085	11/05/2014	11/06/2014	139.50

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CARDHOLDER E	MOES SOUTHWEST GRILL13	03/25/2015	03/26/2015	205.96
CARDHOLDER E	MOES SOUTHWEST GRILL13	03/25/2015	03/26/2015	241.40
CARDHOLDER E	MOES SOUTHWEST GRILL13	03/26/2015	03/27/2015	150.48
CARDHOLDER E	MOES SOUTHWESTGRILL 73	04/28/2015	04/29/2015	214.32
CARDHOLDER E	WHITTS BARBECUE	05/27/2015	05/29/2015	213.21
CARDHOLDER D	THE UPS STORE 3196	06/10/2015	06/11/2015	177.44
CARDHOLDER E	WHITTS BARBECUE	08/18/2015	08/20/2015	171.20
CARDHOLDER E	WHITTS BARBECUE	09/07/2015	09/08/2015	176.28
CARDHOLDER E	JASON'S DELI -WSE	09/08/2015	09/09/2015	186.86
CARDHOLDER E	JASON'S DELI -WSE	09/08/2015	09/09/2015	249.97
CARDHOLDER E	JASON'S DELI -WSE	10/15/2015	10/19/2015	227.97
CARDHOLDER E	MOES SOUTHWEST GRILL13	10/15/2015	10/16/2015	210.97
CARDHOLDER E	MOES SOUTHWEST GRILL13	10/15/2015	10/16/2015	233.07
CARDHOLDER E	WHITTS BARBECUE	10/28/2015	10/30/2015	190.42
CARDHOLDER D	OFFICE DEPOT #1214	04/03/2015	04/06/2015	299.72

Table 4 - Legitimate business but potentially wasteful

ACC.Account Name	MCH.Merchant Name	FIN.Transaction Date	FIN.Posting Date	FIN.Transaction Amount
CARDHOLDER E	BENNETT GALLERIES - FR	10/27/2014	10/28/2014	140.89
CARDHOLDER E	BENNETT GALLERIES - FR	07/31/2015	08/03/2015	614.67
CARDHOLDER E	FEDEXOFFICE 00021931	09/03/2015	09/04/2015	14.19
CARDHOLDER D	FEDEXOFFICE 00021931	08/18/2015	08/19/2015	53.70
CARDHOLDER D	G.S. DIRECT, INC.	01/12/2015	01/14/2015	34.15
CARDHOLDER B	OFFICE DEPOT #22	10/11/2012	10/14/2012	\$199.99
CARDHOLDER B	OFFICE DEPOT #22	10/17/2012	10/19/2012	\$33.98
CARDHOLDER E	OFFICE DEPOT #22	10/10/2015	10/12/2015	72.48
CARDHOLDER E	OFFICE DEPOT #2260	09/22/2014	09/23/2014	63.34
CARDHOLDER E	OFFICE DEPOT #250	09/13/2014	09/15/2014	59.17
CARDHOLDER D	STAPLES 00106955	03/13/2014	03/14/2014	269.69
CARDHOLDER D	STAPLES 00106955	08/06/2014	08/07/2014	284.55
CARDHOLDER D	STAPLES 00106955	09/23/2014	09/24/2014	151.96
CARDHOLDER B	STAPLES 00115394	10/01/2012	10/03/2012	\$97.96
CARDHOLDER A	STAPLES 00115394	09/26/2012	09/28/2012	\$95.99
CARDHOLDER D	STAPLES 00115394	06/24/2014	06/25/2014	110.00
CARDHOLDER D	STAPLES 00118141	04/22/2014	04/23/2014	169.80
CARDHOLDER E	USPS 47615502235803634	08/21/2015	08/24/2015	181.98
CARDHOLDER E	USPS 47615502235803634	12/08/2014	12/09/2014	49.00
CARDHOLDER E	USPS 47615502235803634	12/16/2014	12/17/2014	9.80
CARDHOLDER A	USPS 47615602035802727	12/27/2013	12/29/2013	\$299.00
CARDHOLDER D	USPS 47615602035802727	06/13/2014	06/16/2014	98.00
CARDHOLDER D	USPS 47615602035802727	11/25/2014	11/26/2014	449.03
CARDHOLDER D	USPS 47615602035802727	01/15/2015	01/16/2015	49.00
CARDHOLDER E	USPS 47615602035802727	06/30/2015	07/01/2015	1,225.00

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CARDHOLDER E	USPS 47615602035802727	08/14/2015	08/17/2015	1,058.40
CARDHOLDER D	USPS 47615602035802727	10/30/2014	10/31/2014	1.19
CARDHOLDER D	USPS 47615602035802727	10/24/2013	10/25/2013	44.00
CARDHOLDER D	USPS 47615695525800004	02/09/2015	02/10/2015	49.00
CARDHOLDER D	USPS 47615695525800004	07/27/2015	07/28/2015	21.95
CARDHOLDER D	USPS 47615695525800004	10/23/2014	10/24/2014	5.60
CARDHOLDER D	USPS 47615695525800004	10/30/2014	10/31/2014	5.75
CARDHOLDER E	USPS 47616002135803220	12/03/2015	12/04/2015	23.52
CARDHOLDER D	USPS476156955225703083	03/28/2014	03/31/2014	7.00
CARDHOLDER D	USPS476156955225703083	03/28/2014	03/31/2014	38.50
CARDHOLDER D	USPS476156955225703083	03/28/2014	03/31/2014	49.40
CARDHOLDER D	USPS476156955225703083	03/28/2014	03/31/2014	49.40
CARDHOLDER D	USPS476156955225703083	03/28/2014	03/31/2014	37.05
CARDHOLDER D	USPS476156955225703083	06/27/2014	06/30/2014	39.20

Table 5 - Improperly paid sales tax.

ACC.Account Name	MCH.Merchant Name	FIN.Transaction Date	FIN.Posting Date	FIN.Transaction Amount	Sales Tax Amount
CARDHOLDER E	AMAZON.COM	11/13/2015	11/16/2015	49.05	8.8
CARDHOLDER E	AMAZON.COM AMZN.COM/BI	11/15/2015	11/16/2015	171.24	7.68
CARDHOLDER E	AMAZON.COM AMZN.COM/BI	11/18/2015	11/19/2015	90.61	4.16
CARDHOLDER E	AMAZON.COM AMZN.COM/BI	12/03/2015	12/04/2015	103.60	14.49
CARDHOLDER B	THE HOME DEPOT 732	11/03/2012	11/05/2012	\$116.58	9.87
CARDHOLDER B	KROGER #542	11/04/2012	11/05/2012	\$10.43	0.73
CARDHOLDER E	REGAL AUTOWASH XXIV N	03/06/2014	03/07/2014	175.02	14.02
CARDHOLDER E	DUNKIN #346212 Q35	04/26/2014	04/28/2014	34.92	2.96
CARDHOLDER E	KROGER #542	04/26/2014	04/28/2014	47.49	3.21
CARDHOLDER E	KROGER #542	06/24/2014	06/25/2014	92.66	6.26
CARDHOLDER E	MCDONALD'S F2994	08/05/2014	08/07/2014	92.41	7.82
CARDHOLDER E	KROGER #542	10/14/2014	10/15/2014	210.98	16.77
CARDHOLDER E	DEALS 4629 00046292	10/25/2014	10/27/2014	76.48	6.48
CARDHOLDER E	KRISPY KREME DOUGH	11/02/2014	11/04/2014	51.48	4.36
CARDHOLDER E	KROGER #542	11/17/2014	11/18/2014	9.25	0.78
CARDHOLDER E	KROGER #542	02/24/2015	02/25/2015	93.07	7.65
CARDHOLDER E	KRISPY KREME DOUGH	07/18/2015	07/20/2015	26.93	2.28
CARDHOLDER E	KRISPY KREME DOUGH	07/25/2015	07/27/2015	35.11	2.97
CARDHOLDER E	KRISPY KREME DOUGH	08/22/2015	08/24/2015	35.11	2.97
CARDHOLDER E	KRISPY KREME DOUGH	09/02/2015	09/03/2015	49.10	4.16
CARDHOLDER E	KRISPY KREME DOUGH	09/04/2015	09/07/2015	51.48	4.36
CARDHOLDER E	KRISPY KREME DOUGH	09/05/2015	09/07/2015	51.48	4.36
CARDHOLDER E	KROGER #542	11/19/2015	11/20/2015	76.89	6.36

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CARDHOLDER C	KRISPY KREME DOUGH	08/02/2012	08/02/2012	\$17.46	1.48
CARDHOLDER E	DUNKIN #346212 Q35	04/12/2014	04/14/2014	39.28	3.33
CARDHOLDER E	DUNKIN #346212 Q35	04/19/2014	04/21/2014	34.92	2.96
CARDHOLDER E	THE HOME DEPOT 733	01/16/2015	01/19/2015	43.67	3.7
CARDHOLDER B	JET'S PIZZA WEST END	10/08/2012	10/09/2012	\$88.62	6.66
CARDHOLDER E	TJMAXX #0115	09/13/2014	09/15/2014	148.51	12.57
CARDHOLDER E	MICHAELS STORES 9607	10/28/2014	10/29/2014	6.54	0.55
CARDHOLDER E	JERSEY MIKES SUBS #QPS	05/01/2014	05/02/2014	35.84	3.03
CARDHOLDER E	KROGER #542	09/12/2014	09/15/2014	40.55	3.43
CARDHOLDER E	KMART 3084	12/08/2014	12/10/2014	24.87	2.11
CARDHOLDER E	KROGER #542	12/16/2014	12/17/2014	16.10	1.36
CARDHOLDER E	KROGER #542	12/31/2014	01/02/2015	34.92	2.96
CARDHOLDER E	KROGER #542	04/22/2015	04/23/2015	72.45	5.93
CARDHOLDER E	APPLE STORE #R123	06/17/2015	06/19/2015	141.92	12.02
CARDHOLDER E	KMART 3084	06/26/2015	06/29/2015	13.19	1.12
CARDHOLDER E	KROGER #542	07/21/2015	07/22/2015	63.31	5.36
CARDHOLDER E	KROGER #542	08/26/2015	08/27/2015	183.27	15.26
CARDHOLDER E	CATIA EATERIES	10/13/2015	10/14/2015	8.74	0.74
CARDHOLDER E	CATIA EATERIES	11/02/2015	11/03/2015	8.74	0.74
CARDHOLDER E	KATYS HALLMARK	12/03/2015	12/04/2015	49.16	4.16
CARDHOLDER E	DUNKIN #346212 Q35	07/12/2014	07/14/2014	36.76	3.11
CARDHOLDER E	OFFICE DEPOT #250	09/13/2014	09/15/2014	59.17	5.01
CARDHOLDER E	OFFICE DEPOT #2260	09/22/2014	09/23/2014	63.34	5.36
CARDHOLDER E	KRISPY KREME DOUGH	10/18/2014	10/20/2014	45.04	3.82
CARDHOLDER E	BENNETT GALLERIES - FR	10/27/2014	10/28/2014	140.89	11.93
CARDHOLDER E	KRISPY KREME DOUGH	05/05/2015	05/08/2015	63.78	5.4
CARDHOLDER E	BENNETT GALLERIES - FR	07/31/2015	08/03/2015	614.67	52.04
CARDHOLDER E	FEDEXOFFICE 00021931	09/03/2015	09/04/2015	14.19	1.2
CARDHOLDER E	OFFICE DEPOT #22	10/10/2015	10/12/2015	72.48	6.14
CARDHOLDER B	LOWES #00629	10/09/2012	10/11/2012	50.16	4.25

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CARDHOLDER E	KROGER #542	11/03/2014	11/04/2014	16.26	1.1
CARDHOLDER E	KRISPY KREME DOUGH	08/01/2015	08/03/2015	18.75	1.59
CARDHOLDER E	KROGER #542	09/09/2015	09/10/2015	417.04	28.81
CARDHOLDER E	KROGER #542	12/08/2015	12/09/2015	81.35	6.89
CARDHOLDER E	KROGER #542	05/01/2014	05/02/2014	253.28	21.29
CARDHOLDER E	KROGER #542	01/06/2016	01/07/2016	116.03	7.84
CARDHOLDER E	KROGER #542	07/06/2015	07/07/2015	221.30	15.83

TABLE 6 – Missing supporting documentation.

ACC.Account Name	MCH.Merchant Name	FIN.Transaction Date	FIN.Posting Date	FIN.Transaction Amount
CARDHOLDER B	JERSEY MIKES SUBS#4004B	07/28/2012	07/28/2012	\$52.66
CARDHOLDER E	OVATION AWARDS & ENGRA	01/29/2014	01/31/2014	37.00
CARDHOLDER C	DOMINO'S 5422	08/02/2012	08/02/2012	\$24.50
CARDHOLDER B	THE HOME DEPOT 732	10/15/2012	10/17/2012	\$42.51
CARDHOLDER A	S & S FRAMING	08/02/2013	08/04/2013	\$25.00
CARDHOLDER D	JERSEY MIKE'S SUBS 40	08/01/2015	08/03/2015	53.50
CARDHOLDER D	THE HOME DEPOT 733	08/05/2015	08/07/2015	48.80
CARDHOLDER D	LOWES #02725	08/22/2015	08/24/2015	9.96
CARDHOLDER D	JERSEY MIKE'S SUBS 400	09/05/2015	09/07/2015	64.14
CARDHOLDER E	SAMS INTERNET	05/06/2015	05/08/2015	45.00

TABLE 7 – Missing cardholder’s signature.

ACC.Account Name	MCH.Merchant Name	FIN.Transaction Date	FIN.Posting Date	FIN.Transaction Amount
CARDHOLDER C	THE HOME DEPOT 732	07/30/2012	07/30/2012	\$34.50
CARDHOLDER C	THE HOME DEPOT 732	08/01/2012	08/01/2012	\$34.50
CARDHOLDER B	THE HOME DEPOT 732	11/03/2012	11/05/2012	\$116.58
CARDHOLDER C	KROGER #526	11/12/2012	11/13/2012	\$28.66
CARDHOLDER C	SUBWAY 00117598	11/12/2012	11/14/2012	\$75.00
CARDHOLDER C	CRACKER BARREL #530 BRENT	11/13/2012	11/14/2012	\$31.98
CARDHOLDER C	KROGER #526	11/18/2012	11/19/2012	\$3.69
CARDHOLDER C	SUBWAY 00117598	11/19/2012	11/21/2012	\$65.00
CARDHOLDER A	HOSSE & HOSSE SAFE & LOCK	04/25/2013	04/28/2013	\$22.94
CARDHOLDER C	S & S FRAMING	04/26/2013	04/28/2013	\$35.75
CARDHOLDER A	HOSSE & HOSSE SAFE & LOCK	04/30/2013	05/02/2013	(\$1.94)
CARDHOLDER D	APPLEBEES 819997881999	06/17/2013	06/19/2013	57.22
CARDHOLDER D	MARRIOTT 337U3 MEMPHIS DT	06/19/2013	06/20/2013	275.68
CARDHOLDER D	MARRIOTT 337U3 MEMPHIS DT	06/20/2013	06/21/2013	-19.68
CARDHOLDER D	MARRIOTT 337U3 MEMPHIS DT	06/20/2013	06/21/2013	39.33
CARDHOLDER D	MARRIOTT 337U3 MEMPHIS DT	06/20/2013	06/21/2013	326.19
CARDHOLDER D	MARRIOTT 337U3 MEMPHIS DT	06/20/2013	06/21/2013	326.19
CARDHOLDER D	MARRIOTT 337U3 MEMPHIS DT	06/20/2013	06/21/2013	326.19
CARDHOLDER D	MARRIOTT 337U3 MEMPHIS DT	06/20/2013	06/21/2013	326.19
CARDHOLDER D	MARRIOTT 337U3 MEMPHIS DT	06/20/2013	06/21/2013	326.19

	DT			
CARDHOLDER D	MARRIOTT 337U3 MEMPHIS DT	06/20/2013	06/21/2013	326.19
CARDHOLDER D	MARRIOTT 337U3 MEMPHIS DT	06/20/2013	06/21/2013	326.19
CARDHOLDER D	MARRIOTT 337U3 MEMPHIS DT	06/20/2013	06/21/2013	365.52
CARDHOLDER D	MARRIOTT 337U3 MEMPHIS DT	06/20/2013	06/21/2013	385.20
CARDHOLDER D	MARRIOTT 337U3 MEMPHIS DT	06/24/2013	06/25/2013	-13.12
CARDHOLDER D	MARRIOTT 337U3 MEMPHIS DT	06/24/2013	06/25/2013	217.46
CARDHOLDER E	OVATION AWARDS & ENGRA	01/27/2014	01/29/2014	118.00
CARDHOLDER E	REGAL AUTOWASH XXIV N	03/06/2014	03/07/2014	175.02
CARDHOLDER D	THE HOME DEPOT 733	04/09/2014	04/11/2014	95.28
CARDHOLDER D	THE HOME DEPOT 733	04/09/2014	04/11/2014	368.88
CARDHOLDER E	BEST BUY 00010645	04/24/2014	04/25/2014	899.99
CARDHOLDER E	KROGER #542	04/26/2014	04/28/2014	47.49
CARDHOLDER E	KROGER #542	05/01/2014	05/02/2014	253.28
CARDHOLDER D	THE HOME DEPOT 733	05/03/2014	05/05/2014	325.29
CARDHOLDER D	WHITT'S BARBECUE	05/06/2014	05/08/2014	104.57
CARDHOLDER D	WHITT'S BARBECUE	05/06/2014	05/08/2014	223.63
CARDHOLDER E	WHITTS BARBECUE	06/06/2014	06/09/2014	272.44
CARDHOLDER D	PIZZA HUT	06/10/2014	06/12/2014	52.49
CARDHOLDER E	KROGER #542	06/24/2014	06/25/2014	92.66
CARDHOLDER E	MCDONALD'S F2994	08/05/2014	08/07/2014	92.41
CARDHOLDER E	WHITTS BARBECUE	08/07/2014	08/11/2014	263.56
CARDHOLDER E	WHITTS BARBECUE	09/17/2014	09/19/2014	228.89
CARDHOLDER E	WHITTS BARBECUE	09/19/2014	09/22/2014	17.13
CARDHOLDER E	WHITTS BARBECUE	09/19/2014	09/22/2014	79.09

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CARDHOLDER D	THE HOME DEPOT 733	10/23/2014	10/27/2014	20.41
CARDHOLDER D	THE HOME DEPOT 733	10/28/2014	10/30/2014	119.88
CARDHOLDER E	JASON'S DELI -WSE	11/02/2014	11/04/2014	249.00
CARDHOLDER D	GOODLETTSVILLE AREA CH	03/17/2015	03/18/2015	13.00
CARDHOLDER D	CABLE FOUNDATION	03/19/2015	03/20/2015	100.00
CARDHOLDER D	THE HOME DEPOT 732	03/31/2015	04/02/2015	62.10
CARDHOLDER D	HOMEDEPOT.COM	04/01/2015	04/03/2015	356.40
CARDHOLDER D	THE HOME DEPOT 732	04/01/2015	04/03/2015	-20.70
CARDHOLDER E	BELLVUE CHAMBER	05/07/2015	05/11/2015	125.00
CARDHOLDER D	THE HOME DEPOT 733	07/18/2015	07/20/2015	48.80
CARDHOLDER E	JASON'S DELI -WSE	08/04/2015	08/05/2015	236.98
CARDHOLDER E	JET'S PIZZA	08/04/2015	08/05/2015	65.31
CARDHOLDER E	MOES SOUTHWEST GRILL13	08/07/2015	08/10/2015	239.07
CARDHOLDER E	MOES SOUTHWEST GRILL13	08/07/2015	08/10/2015	247.32
CARDHOLDER E	MOES SOUTHWEST GRILL13	08/07/2015	08/10/2015	249.57
CARDHOLDER D	THE HOME DEPOT 732	08/24/2015	08/26/2015	17.48
CARDHOLDER E	YOUNG LEADERS COUNCIL	09/03/2015	09/04/2015	475.00
CARDHOLDER E	PAPA JOHN'S #00085	09/09/2015	09/10/2015	53.25
CARDHOLDER E	JASON'S DELI -WSE	09/10/2015	09/11/2015	86.99
CARDHOLDER E	SICILIAN PIZZA AND PAS	11/23/2015	11/24/2015	182.65
CARDHOLDER E	MOES SOUTHWEST GRILL13	12/11/2015	12/14/2015	155.97
CARDHOLDER E	MOES SOUTHWEST GRILL13	12/11/2015	12/14/2015	182.97

TABLE 8 - Other non-credit card issues.

Invoice Number	Invoice Submitted by	Invoice Date	Amount
INV 120814-1	CARDHOLDER E	12/8/2014	5.28
INV 1522061	CARDHOLDER E	06/23/2015	29.00
INV 022414-KW	CARDHOLDER E	2/24/2014	97.91
INV 4987	CARDHOLDER E	12/6/2013	16.07
Total			\$ 148.26