UTAH SCHOOLS FOR THE DEAF AND BLIND Report on Investigation of Theft

Findings and Recommendations
For the Period January 2012 through April 2016

Report No. DBS-16-SP2



OFFICE OF THE UTAH STATE AUDITOR

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AUDIT LEADERSHIP:

John Dougall, Utah State Auditor Van Christensen, CPA, CFE, Audit Director Melanie Henderson, CPA, Audit Supervisor



REPORT NO. DBS-16-SP2

July 19, 2016

Utah State Board of Education 250 East 500 South P.O. Box 144200 SLC, Utah 84114-4200

and

Joel Coleman, Superintendent, and The USDB Advisory Council Utah Schools for the Deaf and the Blind 742 Harrison Blvd. Ogden, UT 84404

Dear Board Members, Mr. Coleman, and Advisory Council:

We have completed our investigation of allegations of theft against a former USDB Financial Analyst. The period of our review included transactions occurring from January 2012 to April 2016 as well as several other transactions outside this period that came to our attention. It is likely that the irregular and improper activities noted in this report also occurred prior to this period. Our findings resulting from the review are included in the attached Findings and Recommendations section of this report.

Our procedures were more limited than would be necessary to express an audit opinion on compliance or on the effectiveness of USDB's internal control or any part thereof. Accordingly, we do not express such opinions. Alternatively, we have identified the procedures we performed and the findings resulting from those procedures. Had we performed additional procedures or had we made an audit of the effectiveness of USDB's internal control, other matters might have come to our attention that would have been reported to you.

By its nature, this report focuses on exceptions, weaknesses, and problems. This focus should not be understood to mean there are not also various strengths and accomplishments. We appreciate the courtesy and assistance extended to us by the personnel of USDB during the course of the engagement, and we look forward to a continuing professional relationship. If you have any questions, please contact Melanie Henderson, Audit Supervisor, at 801-739-2247 or mhenderson@utah.gov.

Sincerely,

Van Christensen, CPA, CFE

1 an H Christensen

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UTAH SCHOOLS FOR THE DEAF AND THE BLIND FOR THE PERIOD JANUARY 2012 THROUGH APRIL 2016

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BACKGROUND

Utah Code 53A-25b states that the Utah Schools for the Deaf and the Blind (USDB) is responsible for providing statewide services to children with sensory disabilities. USDB is under the direct control and supervision of the Office of the State Board of Education (Board). The Board is responsible for establishing an Advisory Council for USDB from which the Board may receive advice and recommendations; however, the Board has ultimate responsibility over USDB.

USDB receives funding through state appropriations (State Funds) and from various donors (Donation Funds). State Funds provide education program services such as salaries, classrooms, instructional materials, and other services necessary to administer various educational activities. Donation Funds provide services either as specified by the donor or at the discretion of USDB if not specified by the donor, but only for the benefit of USDB students. State Funds and Donation Funds are tracked independently by USDB in two separate bank accounts and accounting systems.

We were notified by the USDB Superintendent that a former financial analyst employed by USDB (Former Analyst) potentially misused Donation Funds over a two-month period of time. We evaluated bank records and activity from two credit card accounts related to concerns identified. We also evaluated other areas where the Former Analyst had the opportunity to misappropriate funds.

We noted during the period of our review that USDB underwent high turnover in the Finance Director position. Three separate individuals held the position during a four-year period of time. High turnover rate leaves an entity more vulnerable, especially during the transition period. We also noted that over the past 3 years management had identified control weaknesses in several areas and had made significant improvements in those areas.

This report identifies inappropriate use of credit cards as well as possible missing cash receipts. It appears that at least one credit card was added to an existing USDB account by the Former Analyst without USDB's knowledge and authorization. As noted in the following findings, the Former Analyst was able to channel the correspondence related to this card directly to herself. Also, the Former Analyst was the only person who could access account information related to this card.

The use of credit cards can be an efficient method of making purchases, especially small dollar purchases. However, credit card purchases have a higher risk of improper use because controls usually rely on post-approval rather than preapproval. One method of effectively mitigating these risks is the use of purchase cards (p-cards). Depending upon the p-card service provider, these cards can limit purchases to certain businesses, as well as certain items and amounts. In addition, p-card transactions can often be electronically transmitted to the purchasing entity, allowing for the purchase information to be uploaded into accounting systems

FINDINGS AND RECOMMENDATIONS FOR THE PERIOD JANUARY 2012 THROUGH APRIL 2016

and reviewed in a timely manner by supervisors. Information transmitted electronically often includes a description of the item purchased, quantity, and amount. We understand that USDB uses p-cards as well as the potentially misused credit cards noted in this report. We recommend that USDB avoid using credit cards and wisely use p-cards, when appropriate.

FINDINGS AND RECOMMENDATIONS

1. <u>USDB FUNDS WERE MISAPPROPRIATED</u>

We identified at least \$67,093 that was likely misappropriated by the Former Analyst from November 2011 through April 2016. The theft occurred as detailed below:

a. Personal use of USDB Sam's Club credit card

A Sam's Club credit account through Synchrony Bank was opened for USDB in March 2000. It appears that multiple cards were initially issued simply in the name of USDB. Beginning in 2009, it appears that cards were required to be issued to individual USDB employees, with USDB being responsible for payment. Since November 2009, five active user cards were issued to USDB employees—two cards were issued to the Former Analyst using different spellings of her name, and the remaining three cards were issued to other USDB employees. It appears that the Former Analyst obtained at least one card on the account without the knowledge or approval of USDB.

We reviewed all activity for the Former Analyst's USDB Sam's Club credit cards from November 2011 to April 2016 and determined that the Former Analyst charged \$43,672, from 379 transactions during this time period, for personal expenditures (see Appendix A). Of this amount, \$6,674 was for gift cards, \$5,464 for electronics, \$1,393 for automobile fuel, \$1,222 for automotive services, and \$657 for cigarettes. Also, the Former Analyst failed to process payments for the accounts in a timely manner, resulting in USDB paying \$1,568 for late fees and interest on the improper purchases. The remaining amount charged was for personal items such as groceries, home decorations, pet supplies, holiday presents, and clothing. A government entity's failure to pay accounts in a timely manner is unusual and could indicate attempts to conceal improper uses.

All contact information listed on the Sam's Club credit card account, including the email address and phone numbers, was the Former Analyst's USDB contact information. The billing address was also to the "Attention of" the Former Analyst at her USDB address. Per discussion with Sam's Club, the Former Analyst was the only person authorized to make changes to the account. As such, any communication from Sam's Club about the account likely went through the Former Analyst, thus assisting her efforts to conceal any theft.

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We compared the checks which had cleared a USDB Wells Fargo Bank account to the checks recorded in USDB's QuickBooks accounting system for the donation account. We identified four cleared checks that were written out to Sam's Club but recorded in the accounting system under a different payee name. One of these four checks and one additional check were entered into the accounting system *prior* to the Former Analyst leaving employment with USDB, but were used to make payments to Sam's Club *after* leaving employment (see Appendix C). It is likely that the Former Analyst fraudulently recorded these checks in the accounting system in an attempt to conceal her purchases at Sam's Club.

Based on our review of USDB's accounting and bank records, we determined that both State Funds and Donation Funds were used to make payments on the Sam's Club credit card account during the time period of our review. Due to the limited availability of records, our review was restricted to Sam's Club transactions occurring after November 2011. However, potentially fraudulent purchases likely occurred prior to this date.

b. Personal use of USDB Smith's/Kroger credit card

USDB opened a credit card account with Smith's Food and Drug/Kroger (Smith's). We were unable to determine the exact number of cards issued, but verified that they were not issued to a single user and could be used by anyone in possession of a card. According to interviews with USDB employees, two cards were kept in a safe in the business office, together with other cards held by various individuals at multiple USDB campuses. The cards kept in the safe were supposed to be checked out, but USDB was unable to provide us with a log indicating this practice was followed. The Former Analyst had access to the safe.

- Activity from April 30, 2015 through April 30, 2016 We obtained from Smith's the detailed activity of USDB's credit cards and the associated Fresh Values card (Smith's rewards program) information used for each purchase from April 30, 2015 through April 30, 2016 (Smith's was unable to provide detailed purchase activity prior to April 30, 2015). For this one year alone, the Former Analyst charged \$11,780, from 55 transactions (see Appendix B), for inappropriate expenditures using a Fresh Values card issued under the name of the Former Analyst's husband and their home address. Of these purchases, \$7,555 was for gift cards or prepaid credit cards.
- Activity from October 2011 through June 2013 We obtained from USDB as many receipts for Smith's credit card purchases as USDB could locate. We reviewed these receipts for purchases during the period from October 2011 through June 2013. Due to the limited availability of records, we were unable to determine if all receipts were accounted for during this time period. However, even with limited records to review, we were able to identify \$5,437, from 49

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transactions (see Appendix B), in inappropriate purchases, including \$1,910 for gift cards. Although the items listed were purchased with USDB's Smith's credit card, the purchase rewards were credited to the Fresh Value Card issued in the name of the Former Analyst's husband.

- Activity from July 2013 through April 2015 We were unable to obtain any supporting documentation from USDB for all Smith's payments between July 2013 and April 2015 because all relevant information was missing from USDB's files (see Finding No. 4). Although we do not have evidence of potential fraud during these dates, we believe additional misappropriation is likely. We reviewed all payments made to Smith's that were noted on the Advisory Council financial summary report (report) and the donation accounting system from July 2013 to April 2015 and noted discrepancies for two transactions (see Appendix B). Since the Former Analyst prepared these reports, she had the ability to potentially manipulate them to conceal inappropriate purchases. Based on the appearance of continual manipulation of these reports (see Finding No. 2), we estimate that an additional \$2,834 was likely misappropriated through these two transactions alone.
- We compared the checks which had cleared a USDB Wells Fargo Bank account
 to the checks recorded in USDB's QuickBooks accounting system for the
 donation account. We identified three cleared checks that were written out to
 Smith's, but recorded in the accounting system under a different payee name (see
 Appendix C).

In total, we identified at least \$20,051 of potentially fraudulent purchases at Smith's. Based on our review of USDB's accounting and bank records, we determined that both State Funds and Donation Funds were used to make payments on the Smith's credit card account.

c. Missing cash receipts

To determine if all cash receipts were properly deposited, we obtained emails and various deposit forms from any USDB individuals who were likely to collect money from January 2012 to January 2016. We compared this evidence to receipt books and deposit records to see if they were properly recorded in the receipt book and deposited. We noted 10 items, totaling \$3,370, that either were not listed in the receipt book and therefore not deposited, or were listed in the receipt book but were excluded in the deposit calculation (see Appendix D).

USDB's normal cash receipting process and controls should have caught any missing cash. However, during our interviews with multiple current and former USDB employees, we determined this process was not always followed. For example, although

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the Former Analyst was not supposed to handle cash receipts until preparing the deposit, the following allegations indicate she had the ability to take the missing cash:

- The Former Analyst often had access to the cash before it was properly logged, either by accepting cash deliveries from other departments or accessing cash left in the business office safe.
- The Former Analyst often took cash receipts to another employee who was responsible for logging the receipt. Sometimes these receipts included checks dated weeks earlier, which could indicate efforts to conceal misappropriated cash receipts.
- Large spans of time often occurred between dates when the cash was initially received to the time of the bank deposit (see Finding No. 6). In addition, we received complaints that USDB took a long time to deposit checks. The Former Analyst was responsible for preparing the deposit. Failure to make deposits in a timely manner is an indicator of a potential fraud scheme.
- Other USDB employees indicated that the Former Analyst was often seen pulling cash out of her desk drawers—a place cash should never have been stored.
- USDB directors complained that money received was not showing up on financial summary reports.

We believe there is a high likelihood that the Former Analyst misappropriated these missing cash receipts of \$3,370. Not only did she have access to the cash, but she had the ability to conceal the misappropriations. In addition, it is likely that the Former Analyst was responsible for additional missing cash and checks during the period of our review for which documentation of receipts was not available.

During 2014, USDB's Finance Director introduced a Chain of Custody form that required signatures from everyone who took possession of the cash. These forms improved controls over this area; however, some employees did not always use or retain copies of the form. If an employee stole money, that employee could have destroyed the form to hide the evidence.

Inadequate internal controls and management's misunderstanding of duties allowed this potential fraud to occur (see Finding No. 3).

Recommendation:

We recommend that USDB implement and monitor adequate internal controls (see Finding No. 3 below), including proper separation of duties, to prevent and detect theft. We also recommend that USDB pursue civil litigation to recover the stolen funds and turn the matter over to authorities for criminal prosecution.

FINDINGS AND RECOMMENDATIONS FOR THE PERIOD JANUARY 2012 THROUGH APRIL 2016

2. MANAGEMENT FINANCIAL REPORTS WERE FALSIFIED

The USDB Advisory Council is presented each month with a report to summarize the account balances and monthly activity in the donation account. We obtained these Advisory Council financial summary reports (reports) for the period between January 2012 and March 2016. The reports were supposed to include information taken directly from the donation accounting system. These reports were also supposed to be reconciled to the donation account bank statements. However, the Former Analyst was the only person entering transactions into this accounting system, performing bank reconciliations, and preparing the report. In addition, no independent comparison between the reports and accounting system occurred. We noted the following ways in which the Former Analyst manipulated and falsified the reports, indicating efforts to conceal the theft of Donation Funds documented in Finding No. 1 above:

- The donor name or donation description entered in the accounting records was different from that entered on the report.
- Some checks were excluded from the report, while other checks were included at a higher amount than recorded in the accounting system so the report balanced.
- Checks were entered into the accounting system at a lower amount and bogus checks added to make up the difference so the report balanced.
- Deposits (usually unexpected deposits) were submitted to the bank but not recorded, then a check was written for the same dollar amount but also not recorded; thus, the account reconciled. This indicates a scheme by which checks to USDB were misappropriated.
- Transfers between budget lines did not always equal. Combined with an unreported check payment, the account balanced.
- Checks were back dated in the accounting system to the prior reporting period and, therefore, would never show up on a report.
- An inappropriate payment was excluded from the report, but a valid payment and check were listed twice on the report so the report balanced.

Recommendation:

We recommend that USDB adequately separate the duties involving access to accounting records, bank reconciliation, and report preparation to eliminate the potential for manipulation of the USDB Advisory Council report. We also recommend that USDB use an accounting system that does not allow transactions to be reported in the prior period without a clear audit trail that tracks the adjustment.

FINDINGS AND RECOMMENDATIONS FOR THE PERIOD JANUARY 2012 THROUGH APRIL 2016

3. <u>INTERNAL CONTROLS WERE INADEQUATE</u>

The term "internal controls" is used to describe processes put in place by the governing body, management, or others to provide consistent and efficient operations, including reasonable assurance that funds will be properly safeguarded. Proper internal controls include separating certain responsibilities so that no one person has the ability to improperly use money without detection. Ideally the responsibilities for authorization, custody of assets, record keeping, and reconciliation should be separated.

The theft and weaknesses noted in Finding Numbers 1 and 2 above occurred without detection because of inadequate separation of duties, management's failure to implement and enforce effective internal controls, and USDB staff's failure to follow established procedures. As a result, the Former Analyst was able to make improper purchases that were paid for using USDB funds and take cash receipts without timely detection as follows:

a. Improper disbursements of Donation Funds

Donation Funds are held in a bank account and tracked in an accounting system (QuickBooks) separate from State Funds. The Former Analyst had the ability to record transactions into QuickBooks, had access to blank checks, printed and signed checks, prepared the bank reconciliation, and prepared the report used to review disbursements. No independent review over any of these areas appeared to take place to prevent misappropriation. Processing all donation account transactions through FINET with a state bank account instead of using QuickBooks would allow USDB to embed better accounting system controls.

We determined that the following controls were supposed to have been in place but were not functioning properly or were not adequately monitored:

- Two separate individuals were supposed to sign each check written from the donation account. However, the checks only had one signature line and the bank processed the checks with only one signature.
- According to the former Finance Director, a reconciliation of all credit card statements to approved receipts was supposed to be performed by a separate individual from the one making the purchase. Due to miscommunication or misunderstanding between management and the individual who was supposed to perform this reconciliation, Sam's Club and Smith's statements were always given directly to the Former Analyst to perform the reconciliation and were not reviewed by a separate individual.
- According to USDB policy 3.3, all disbursements of Donation Funds were required to go through USDB's preapproval system and obtain a purchase order before payment. However, we determined from review of the system and discussion with employees that some recurring disbursements (i.e. Smith's) did

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not follow this process. Also, this system could be bypassed without detection since no one was comparing disbursements with approvals.

- The Advisory Council report was compared to the bank reconciliation; however, both were prepared by the Former Analyst and could be manipulated to prevent others from detecting any misappropriation (see Finding No. 2 above).
- All checks were to be accounted for during the bank reconciliation to effectively identify theft or errors. However, USDB's blank checks for the donation account were accessible in an unlocked filing cabinet in the business office, and many of these checks were missing. In addition, checks were written out of numerical order and some duplicate check numbers were used. We found no indication that checks were being properly accounted for. Not accounting for checks, writing checks out of numerical order, and using duplicate check numbers allows inappropriate checks to be issued without detection. USDB should enlist an individual separate from the person who enters transactions into the accounting system to obtain and review processed checks and account for *all* checks as part of the bank reconciliation.

b. Improper disbursements of State Funds

State Funds are recorded and tracked through the state's accounting system (FINET). The Former Analyst recorded transactions in FINET. FINET required approval from a separate individual for all disbursements. Once approved, checks were mailed by State Finance, not USDB. Although controls for disbursements processed through FINET were stronger than QuickBooks, we determined that there were still controls that failed, as follows:

- As noted above, USDB requires a reconciliation of all credit card statements to approved receipts to be performed by a separate USDB individual from the one making the purchase. Sam's Club and Smith's credit card statements were always given directly to the Former Analyst to perform the reconciliation, and the Former Analyst's purchases, as noted directly on the statements, were not reviewed by a separate individual. Those individuals approving the transactions in FINET assumed these reconciliations had been completed by a separate individual and, therefore, did not review the transactions in detail. The FINET approvers reviewed only for the coding and total amounts.
- According to USDB policy 2.3, all disbursements were required to go through USDB's preapproval system and obtain a purchase order before payment could be made via FINET. However, we determined from review of the system and discussion with employees that this process was not followed for some recurring disbursements (i.e. Smith's). Also, this preapproval system could be bypassed without detection since no one was comparing disbursements with approvals.

FINDINGS AND RECOMMENDATIONS FOR THE PERIOD JANUARY 2012 THROUGH APRIL 2016

c. Missing cash receipts

Cash receipts from USDB's various schools and locations were delivered to the business office. One individual was supposed to receive all cash and checks, with a backup person as needed. The Former Analyst had not been appointed as one of these two individuals and was not supposed to accept cash receipts. However, after discussions with several USDB employees, we determined that cash receipts were delivered directly to the Former Analyst on many occasions.

The Former Analyst was responsible for adding up the receipt amounts and preparing the deposit, with a separate individual delivering the deposit to the bank. The addition of the receipt amounts did not appear to be independently verified, and we found an instance where one receipt was excluded from the total. With an average of 35 days between deposits and a large of amount of receipts to add up, a receipt could easily be excluded without detection.

Recommendation:

We recommend that USDB implement proper and adequate internal controls and monitor to ensure they are understood and followed by USDB employees. The internal controls should include the following:

- Process all donation account transactions through FINET with a state bank account instead of using QuickBooks for better embedded accounting system controls.
- Monitor the credit card and p-card reconciliation process to ensure the reconciliation is performed on all credit cards by an individual separate from the person who makes purchases on the card.
- Implement a review process to monitor that preapprovals occur according to policy.
- Have an individual with read-only access to the accounting system prepare the Advisory Council reports.
- Enlist an individual separate from the person who enters transactions into the accounting system to obtain and review processed checks or copies of checks and account for *all* checks as part of the reconciliation process. This would include a review of unused checks, checks written out of numerical order, and checks with duplicate check numbers. In addition, we recommend that USDB secure the unused check stock.
- Perform adequate reviews of all FINET transactions to ensure propriety.
- Strengthen the cash handling process.

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4. MISSING DOCUMENTS

USDB did not maintain documents in accordance with the Government Records Access and Management Act (GRAMA). As a result, we were unable to review supporting documentation for many of the transactions identified in Finding No. 1 above. *Utah Code 63G-2-604* requires that governmental entities maintain records in accordance with applicable retention schedules. This includes ensuring that records are properly safeguarded to prevent them from being lost, stolen, or improperly destroyed. USDB was unable to locate the following information:

- All donation account payment activity from July 1, 2013 through June 30, 2015.
- Statements and receipts for almost all Sam's Club transactions identified in Finding No. 1 above.
- Credit card statements and receipts for almost all Smith's transactions after June 2013.
- Documentation, such as reconciliations and receipts, verifying the appropriate use of petty cash prior to January 2016. The Former Analyst was the custodian of petty cash and was responsible for tracking, replenishing, and reconciling the petty cash, as well as preparing and maintaining the records.

In addition to identifying a significant number of missing documents, we received allegations that the Former Analyst had shredded documents prior to leaving employment at USDB. Because no other copies or electronic versions of the documents were retained, we were unable to review evidence of additional likely misappropriation.

Since FINET has document imaging capability, USDB would benefit from using FINET to record all their transactions, thereby safeguarding their financial documents.

Recommendation:

We recommend that USDB ensure that records are secured and retained as required by state record retention laws. We also recommend that USDB consider using FINET to process all their transactions, which would assist them in archiving and safeguarding their financial documents.

5. TAX EXEMPTION USED IMPROPERLY FOR PERSONAL USE

It appears the Former Analyst improperly used USDB's tax exemption on personal purchases and may have violated state tax laws. *Utah Code 59-12* requires sales and use tax to be paid for retail sales of tangible personal property made within the state, unless the exemption rules are met. As a state entity, purchases made by USDB are exempt from sales and use tax; however, any purchases for personal use rather than USDB's use would not

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qualify for a tax exemption. We reviewed the sales tax paid for each of the items identified in Finding No. 1 above that were potentially misappropriated. We calculated the tax rates for all personal purchases, which we expected to be between 3% (state grocery food sales tax rate) and 7.1% (Weber County sales tax rate). See Appendix A and B for tax rate calculations. We excluded from the calculation items that are not subject to sales tax (gift cards, auto fuel, interest and fees).

Of the 379 Sam's Club credit card transactions, 70 were completely exempted from sales tax and the remaining 3 transactions were partially exempted from tax and charged a tax rate below 3%. Of the 104 Smith's transactions, 88 were completely exempted from sales tax and the remaining 7 were partially exempted.

Recommendation:

We recommend that USDB adequately review purchases to ensure employees are properly using USDB's tax exemption status. We also recommend that USDB, pursue civil litigation to recover stolen funds (see recommendation to Finding No. 1), and also attempt to recover the amount of sales tax which should have been paid on personal items.

6. <u>UNTIMELY DEPOSIT OF CASH RECEIPTS</u>

We reviewed receipt logs and deposits from January 2012 to January 2016 and noted an average of 35 days between deposits, with the longest span being 62 days (see Appendix E). *Utah Code* 51-4-1(2) requires all collections of state money to be deposited no later than once every three banking days, unless exempted through the receipt of a written variance from the State Treasurer. USDB had no such exemption.

USDB's Salt Lake City campus sends cash receipts by courier to the Ogden business office for deposit, adding additional time between collection and deposit of money. We noted one document receipt date of 5/22/14, receipt log date of 7/29/14, and deposit date of 8/18/14—a span of 88 days between actual receipt and deposit of these funds. We note that the Salt Lake City campus could deposit in a local bank and send the receipt log and validated deposit slip to Ogden rather than sending cash and checks. USDB should also consider the use of electronic check deposits as a way to deposit in a timely manner.

Failure to deposit cash receipts in a timely manner increases the risk that money may be lost or stolen.

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Recommendation:

We recommend that USDB deposit all cash receipts within three banking days in compliance with *Utah Code* 51-4-1(2). We also recommend that USDB identify opportunities for their campuses to make deposits more timely, such as depositing at local banks or using electronic check depositing/processing at each location.

Personal Purchases using USDB Sam's Club Credit Card

All purchases below were purchased using the two cards issued under the name of the Former Analyst

	Purchase	Store Location	Purchase Description	Amount	Tax	Tax %
Date	Date	Otoro Location	·			
3/2/2016	3/2/2016	Carrela Chih Divardala	Interest	25.54	n/a	n/a
		Sam's Club - Riverdale Sam's Club - Riverdale	\$100 MasterCard, (2) \$200 MasterCards, Denver Broncos Item Auto Fuel	537.44 21.25	1.20 n/a	7.07% n/a
		Sam's Club - Riverdale	\$100 MasterCard, (4) \$200 MasterCards	933.14	n/a n/a	n/a
		Sam's Club - Riverdale	Groceries	139.61	5.54	4.13%
	2/7/2016	Sam's Club - Riverdale	Food Court	19.71	1.47	8.06%
2/2/2016	1/20/2016	Sam's Club - Riverdale	(3) \$100 MasterCards; \$80 MasterCard, Groceries	789.62	5.99	1.32%
2/2/2010		Sam's Club - Riverdale	Food Court	9.98	0.74	8.01%
		Walmart - Riverdale	Treats	2.02	0.06	3.06%
		Walmart - Riverdale	VMC \$50 MasterCard	53.94	n/a	n/a
	1/4/2016	Walmart - Riverdale	Wireless Headset	64.10	4.22	7.05%
1/2/2016		Walmart - Harrisville	Star Wars Episodes 4, 5, 6 DVDs	59.98	3.65	6.48%
	12/24/2015	Walmart - Harrisville	Groceries, Toiletry Items	84.93	4.29	5.32%
	12/20/2015	Walmart - Harrisville	Clothing, Nail Polish, Toys, Holiday Gift Sets	281.49	18.05	6.85%
	12/20/2015	Walmart - Harrisville	Beats Headphones, 2 Xbox Games	213.52	13.69	6.85%
	12/19/2015	Walmart - Harrisville	Groceries, Clothing, Holiday Items/Gifts	535.25	26.17	5.14%
	12/14/2015	Walmart - Ogden	Cigarettes	14.08	0.82	6.18%
	12/6/2015	Walmart - Riverdale	Groceries, Holiday Decorations	223.15	9.63	4.51%
	12/3/2015	Walmart - Riverdale	Groceries	2.58	0.08	3.20%
	12/3/2015	Walmart - Riverdale	Energy Drink, Ketchup, Rubbing Alcohol	10.49	0.41	4.07%
	12/3/2015	Walmart - Riverdale	Applebee's \$25 Gift Card	25.00	n/a	n/a
	12/2/2015	Walmart - Riverdale	Groceries	25.51	0.74	2.99%
	12/1/2015	Sam's Club - Riverdale	Auto Fuel	20.13	n/a	n/a
	12/1/2015	Sam's Club - Riverdale	Auto Fuel	18.09	n/a	n/a
	12/1/2015	Walmart - Riverdale	Energy Drink, Clothing, Picture Frame	35.71	2.22	6.63%
	12/1/2015	Walmart - Riverdale	Groceries	12.78	0.84	7.04%
	11/30/2015	Walmart - Riverdale	Groceries	77.46	2.80	3.75%
12/2/2015	12/2/2015		Interest	45.83	n/a	n/a
	11/29/2015	Walmart - Riverdale	Groceries	32.59	1.16	3.69%
	11/28/2015	Sam's - Riverdale	Auto Fuel	4.79	n/a	n/a
	11/28/2015	Sam's - Riverdale	Food Court	12.66	0.91	7.74%
	11/28/2015	Sam's - Riverdale	VMC \$100 MasterCard, Batteries	124.50	1.26	7.05%
	11/28/2015	Walmart - Riverdale	Xbox Game	74.89	4.93	7.05%
	11/25/2015	Walmart - Riverdale	Groceries	46.18	1.53	3.43%
	11/23/2015	Walmart - Riverdale	Groceries	55.42	1.84	3.43%
	11/23/2015	Walmart - Riverdale	Cigarettes	58.77	3.77	6.85%
	11/3/2015	Sam's - Riverdale	Auto Fuel	29.17	n/a	n/a
11/2/2015	11/2/2015		Interest	43.57	n/a	n/a
	10/29/2015	Sam's - Riverdale	Auto Fuel	18.71	n/a	n/a
	10/27/2015	Walmart - Riverdale	Boots - 10/26 boots exchanged for ones costing more	5.31	0.35	7.06%
	10/27/2015	Walmart - Riverdale	Groceries	50.00	2.65	5.60%
	10/26/2015	Walmart - Riverdale	Boots	21.38	1.41	7.06%
	10/26/2015	Walmart - Riverdale	Gift Card Reload \$100	105.44	n/a	n/a
	10/26/2015	Walmart - Riverdale	Automotive battery	128.28	8.45	7.05%
	10/26/2015	Walmart - Riverdale	Gift Card Reload \$100	105.00	n/a	n/a
	10/22/2015	Sam's - Riverdale	Auto Fuel	27.73	n/a	n/a
	10/22/2015	Sam's - Riverdale	Auto Fuel	31.28	n/a	n/a
	10/22/2015	Walmart - Riverdale	Groceries	14.79	0.97	7.02%
	10/21/2015	Walmart - Riverdale	Medicine	7.47	0.49	7.02%
	10/20/2015	Walmart - Harrisville	Groceries	75.47	2.20	3.00%
	10/20/2015	Walmart - Harrisville	HP Laptop Computer, Xbox Controller	253.84	-	0.00%
	10/7/2015	Walmart - Riverdale	Gift Card Reload \$25	28.44	n/a	n/a
	10/5/2015	Sam's - Riverdale	Auto Fuel	25.05	n/a	n/a
	10/5/2015	Sam's - Riverdale	Auto Fuel	52.48	n/a	n/a
	10/5/2015	Walmart - Riverdale	VMC \$50 gift card	53.94	n/a	n/a
	10/4/2015	Walmart - Riverdale	Meds	21.30	1.10	5.45%
10/2/2015	10/2/2015		Interest	45.80	n/a	n/a
	9/26/2015	Walmart - Riverdale	HP Laptop computer	191.62	12.62	7.05%
	9/8/2015	Sam's - Riverdale	Auto Fuel	46.09	n/a	n/a
	9/8/2015	Walmart - Riverdale	Groceries	15.68	0.77	5.16%
	9/6/2015	Walmart - Riverdale	VMC \$50 gift card	53.94	n/a	n/a
	9/4/2015	Walmart - Riverdale	Miscellaneous	3.71	0.24	6.92%
	9/4/2015	Walmart - Riverdale	VMC \$25 gift card	28.44	n/a	n/a
	9/3/2015	Walmart - South Ogden	Auto Fuel	31.67	n/a	n/a
	9/3/2015	Walmart - Riverdale	Treats	3.05	0.09	3.04%
		Walmart - Riverdale	VMC \$25 gift card	28.44	n/a	n/a
	9/3/2015	Walmart - Riverdale	VMC \$50 gift card	53.94	n/a	n/a
	0, 0, 0					

Statement Date	Purchase Date	Store Location	Purchase Description	Amount	Тах	Tax %
	9/1/2015	Sam's - Riverdale	Auto Fuel	8.68	n/a	n/a
	8/31/2015	Walmart - Riverdale	Groceries	98.21	3.25	3.42%
9/2/2015	8/30/2015	Sam's - Riverdale	Auto Fuel	32.62	n/a	n/a
	8/30/2015	Sam's - Riverdale	Groceries/ Cigarettes (2 at 45.57 ea)	236.55	11.05	4.90%
	8/30/2015	Walmart - Riverdale	Groceries	77.46	3.72	5.04%
	8/21/2015	Sam's - Riverdale	Groceries	240.40	11.12	4.85%
	8/20/2015	Walmart - Riverdale	Clothing	51.75	3.41	7.05%
	8/19/2015	Sam's - Riverdale	Food court	7.51	0.56	8.06%
	8/19/2015	Sam's - Riverdale	Auto Fuel	20.15	n/a	n/a
	8/19/2015	Sam's - Riverdale	Auto Fuel	23.01	n/a	n/a
	8/18/2015	Sam's - Riverdale	Auto Fuel	38.48	n/a	n/a
	8/18/2015	Walmart - Riverdale	Groceries, Handwarmers, Household Items	160.74	5.22	3.36%
	8/17/2015	Walmart - Riverdale	Groceries	8.22	0.24	3.01%
	8/17/2015	Walmart - Riverdale	Groceries	11.47	0.60	5.52%
	8/15/2015	Sam's - Riverdale	Auto Fuel	34.58	n/a	n/a
	8/15/2015	Walmart - Riverdale	Groceries	55.76	2.50	4.69%
	8/14/2015	Sam's - Riverdale	Condiment	1.63	0.13	8.67%
	8/14/2015	Sam's - Riverdale	Food court	14.87	1.11	8.07%
	8/12/2015	Walmart - Riverdale	Groceries, Medicine	20.14	1.26	6.67%
	8/11/2015	Sam's - Riverdale	Food court	3.54	0.26	7.93%
	8/11/2015	Sam's - Riverdale	\$200 Prepaid MasterCard, Drink	207.90	0.07	7.87%
	8/10/2015	Walmart - Riverdale	Groceries	87.88	2.84	3.34%
	8/10/2015	Walmart - Riverdale	Medicine	16.29	1.07	7.03%
	8/9/2015	Sam's - Riverdale	Cigarettes	48.78	3.21	7.04%
	8/9/2015	Sam's - Riverdale	Medicine	18.03	1.19	7.07%
	8/9/2015	Walmart - Riverdale	Groceries, Miscellaneous	24.62	1.01	4.28%
	8/9/2015	Walmart - Riverdale	Snacks, Paper Products	16.19	0.86	5.61%
	8/8/2015	Sam's - Riverdale	Auto Fuel	20.63	n/a	n/a
	8/8/2015	Sam's - Riverdale	Auto Fuel	33.76	n/a	n/a
	8/8/2015	Walmart - Riverdale	Paint Supplies, Groceries, Makeup, Miscellaneous	141.53	8.05	6.03%
	8/8/2015	Walmart - Riverdale	Xbox Live Subscription, Knife	37.55	0.83	2.26%
	8/4/2015	Sam's - Riverdale	Groceries	125.82	-	0.00%
8/2/2015	8/2/2015		Interest and Late Fee	99.50	n/a	n/a
	7/1/2015	Walmart - South Ogden	Prescriptions	89.23	n/a	n/a
7/2/2015	6/29/2015	Sam's - Riverdale	Auto Fuel	41.60	n/a	n/a
	6/29/2015	Sam's - Riverdale	Food Court	6.78	0.50	7.96%
	6/29/2015	Sam's - Riverdale	Auto Fuel	25.57	n/a	n/a
	6/29/2015	Sam's - Riverdale	\$200 Prepaid MasterCard	206.94	n/a	n/a
	6/29/2015	Sam's - Riverdale	Groceries, Cleaning Supplies, Router	211.60	-	0.00%
	6/29/2015	Walmart - Riverdale	Clothing, Miscellaneous	71.47	4.71	7.06%
	6/29/2015	Walmart - South Ogden	Prepaid MasterCard	105.44	n/a	n/a
	6/24/2015	Walmart - Riverdale	Groceries	7.15	0.21	3.03%
	6/23/2015	Sam's - Riverdale	Auto Fuel	36.65	n/a	n/a
	6/23/2015	Walmart - Riverdale	Clothing	55.99	3.69	7.06%
	6/9/2015	Sam's - Riverdale	Auto Fuel	25.00	n/a	n/a
	6/9/2015	Sam's - Riverdale	Clothing, Groceries, Medicine, Cleaning Supplies	97.35	-	0.00%
	6/2/2015	Walmart - Riverdale	Groceries	41.77	1.33	3.29%
6/2/2015	6/2/2015	Trainian Turordaio	Interest	56.22	n/a	n/a
5/2/2015	5/2/2015		Interest	69.69	n/a	n/a
4/2/2015	4/2/2015		Interest and Late Fee	111.65	n/a	n/a
1/2/2010	3/29/2015	Sam's - Riverdale	Auto Fuel	41.06	n/a	n/a
		Walmart - Ogden	Candy, Clothing, Shoes	45.62	2.37	5.48%
	3/11/2015	Sam's Club - Riverdale	Auto Membership Fee	55.00	3.87	7.58%
3/2/2015	3/2/2015	Cam o Clab Triverdale	Interest	12.40	n/a	n/a
3/2/2013	2/26/2015	Sam's Club - Riverdale	(3) \$142.98 Disney Gift Cards, (3) \$206.94 MasterCards	1049.76	n/a	n/a
	2/26/2015	Sam's Club - Riverdale	Clothing	58.20	11/a	0.00%
	2/23/2015	Sam's Club - Riverdale	(2) \$142.98 Disney Gift Cards, (2) \$206.94 MasterCards	699.84	n/a	0.007 n/a
		Walmart - Riverdale	Hair items, Groceries, Automotive	88.00	5.42	6.56%
	2/22/2015	Walmart - South Ogden	Eyebrow products, Kitty Litter	21.19	1.49	7.56%
		Sam's Club - Riverdale	Groceries, Medicine, Shoes, Storage Dishes	126.32	1.43	0.00%
2/2/2015	2/11/2015	Jam 3 Jiub - Niveruale	Interest and Late Fee	92.44	 n/a	0.009 n/a
1212013		Walmart - Ogden				
	1/30/2015	·	Household Items, Sun Care	80.77	5.18	6.85%
	1/28/2015	Sam's Club - Riverdale	Groceries Crossing Household Items Medicine	16.55	4 77	0.00%
1/0/0015	1/26/2015	Walmart - South Ogden	Groceries, Household Items, Medicine	34.86	1.77	5.35%
1/2/2015	1/2/2015		Interest	43.02	n/a	n/a
	12/2/2014	Walmart - Riverdale	Medicine, Household Items	17.50	1.15	7.03%
	12/2/2014	Sam's Club - Riverdale	Frappuccino, Groceries, Household Items, Clothing	199.91	-	0.00%
	12/2/2014	Walmart - Ogden	VMC \$50 MasterCard	53.94	n/a	n/a
	•	l	Groceries, Household Items, Clothing, Christmas Items, \$100 VMC	005.04		1 4 4 4 0
	12/2/2014	Walmart - Ogden	MasterCard	285.01	11.34	4.14%

Statement Date	Purchase Date	Store Location	Purchase Description	Amount	Tax	Tax %
2 0.00	12/2/2014	Walmart - South Ogden	Groceries	12.63	0.37	3.02%
12/2/2014	12/2/2014		Interest	43.04	n/a	n/a
	11/27/2014	Walmart - Riverdale	Xbox Game, RCA Tablet	54.53	5.57	7.05%
	11/27/2014	Walmart - Riverdale	Xbox Console with protection plan, DVDs, Pajamas, Dishes, BB Gun, RCA Tablet, \$263.37 Walmart Shopping Card	787.17	34.50	4.58%
	11/4/2014	Walmart - Ogden	Snacks, DVD, Xbox game	104.61	6.11	6.20%
11/2/2014	11/2/2014		Interest	41.57	n/a	n/a
		Walmart - South Ogden	Groceries, Lightning Cable	63.72	2.74	4.49%
	10/10/2014	Sam's Club - Riverdale	Auto Fuel	51.50	n/a	n/a
	10/6/2014 10/4/2014	Walmart - Riverdale Walmart - Harrisville	DVD Groceries	4.24 14.33	0.28 0.42	7.07% 3.02%
	10/3/2014	Sam's Club - Riverdale	Halloween Candy	79.86	- 0.42	0.00%
	10/3/2014	Sam's Club - Riverdale	Groceries, Kitchen Dishes	64.86	-	0.00%
	10/3/2014	Walmart - Harrisville	Snacks, Cable Tie, Halloween Items	9.70	0.39	4.19%
	10/2/2014	Sam's Club - Riverdale	Auto Fuel	51.50	n/a	n/a
10/2/2014	10/2/2014		Interest	48.77	n/a	n/a
- /- / / /	9/24/2014	Walmart - Riverdale	Gum, Clothing, Household Items	36.35	2.32	6.82%
9/2/2014	9/2/2014	Canala Chiha Dinandala	Interest Dillege Crossins Madisins	41.79	n/a	n/a
	8/26/2014 8/19/2014	Sam's Club - Riverdale Walmart - Riverdale	Pillows, Groceries, Medicine	91.67 86.71	5.08	0.00% 6.22%
	8/19/2014	Sam's Club - Riverdale	Groceries, Makeup, Clothing Evaporative cooler and air conditioner	362.94	5.06	0.00%
	8/10/2014	Sam's Club - Riverdale	Groceries	79.66	_	0.00%
	8/10/2014	Sam's Club - Riverdale	Automotive	565.88	37.00	7.00%
8/2/2014	8/2/2014		Interest	38.42	n/a	n/a
	7/8/2014	Sam's Club - Riverdale	Groceries	82.76	-	0.00%
	7/8/2014	Sam's Club - Riverdale	Portable Air Conditioner	299.98	-	0.00%
	7/6/2014	Walmart - Riverdale	Ext Cords, Fan	61.76	4.07	7.05%
7/2/2014	7/2/2014		Interest	43.32	n/a	n/a
		Walmart - Riverdale	Automotive, Household Items, Clothing	198.45	13.03	7.03%
	6/20/2014 6/20/2014	Sam's Club - Riverdale Walmart - Riverdale	Groceries Snacks, Clothing	429.01 57.93	3.67	0.00% 6.76%
		Walmart - Ogden	Clothing, DVD, Furniture	36.78	2.36	6.86%
	6/8/2014	Sam's Club - Riverdale	Groceries, Household Items, Clothing	314.84	-	0.00%
6/2/2014	6/2/2014		Interest	47.32	n/a	n/a
	5/23/2014	Sam's Club - Riverdale	Snacks	84.25	•	0.00%
	5/17/2014	Walmart - Riverdale	(2) Bicycles, Garden Supplies	231.67	15.26	7.05%
	5/2/2014	Sam's Club - Riverdale	Popcorn Supplies	20.22	-	0.00%
5/2/2014	5/2/2014	0 1 01 1 10	Interest and Late Fee	92.13	n/a	n/a
	4/8/2014 4/8/2014	Sam's Club - Riverdale Sam's Club - Riverdale	Easter Toys, Snacks, DVD, CD Snacks	56.90	-	0.00%
	4/8/2014	Sam's Club - Riverdale	Groceries, Medicine	66.91 125.78		0.00%
4/2/2014	4/2/2014	Sams Club - Niverdale	Interest	54.34	n/a	n/a
1,2,2011	3/28/2014	Walmart - Riverdale	DVDs, Snacks, Soda Stream starter kit	133.41	8.49	6.80%
	3/11/2014	Sam's Club - Riverdale	Auto Membership Fee	55.00	3.87	7.58%
	3/8/2014	Walmart - Layton	Groceries, Household Items	86.17	3.32	4.01%
	2/28/2014	Sam's Club - Riverdale	Utensils, Ceramic Flat Irons, Lip Balm	297.27	8.78	3.04%
	2/28/2014	Walmart - Ogden	(2) T-Mobile Cell Phones	106.59	6.83	6.85%
3/2/2014	3/2/2014	Walnut Di O '''	Interest and Late Fee	85.42	n/a	n/a
	2/20/2014	Walmart - South Orden	Crocories	22.83	1.44	6.73%
	2/7/2014 2/5/2014	Walmart - South Ogden Sam's Club - Riverdale	Groceries Groceries, Blanket	54.13 87.20	2.21	4.26% 0.00%
	2/2/2014	Walmart - Riverdale	Xbox Game Pack, Clothing	118.90	7.83	7.05%
2/2/2014	2/2/2014		Interest	47.74	n/a	n/a
	1/20/2014	Walmart - Riverdale	Car Battery, Printer Cartridge Ink	148.52	9.78	7.05%
	1/19/2014	Sam's Club - Riverdale	Groceries, Batteries, Clothing, Dog Treats	211.90	-	0.00%
	1/19/2014	Walmart - Riverdale	School Supplies, Household Items	37.91	2.36	6.64%
1/2/2014	1/2/2014		Interest	51.61	n/a	n/a
		Walmart - Riverdale	IPhone Case, CD holder	14.79	0.97	7.02%
		Walmart - Riverdale Sam's Club - Riverdale	Groceries, Headphones, Holiday Items TV and HDMI cables	98.64 250.00	5.20	5.57%
12/2/2013	12/2/2013	Jam's Club - Kiverdale	Interest	250.00 35.15	n/a	0.00% n/a
		Walmart - Riverdale	Groceries, Household Items, Baby Items, Clothing, \$104.91	341.28	15.49	4.75%
		Walmart - Riverdale	Walmart Shopping Card Video Game Rocker/Speaker, 3 Skincare Sets, Holiday Gifts/Toys,	538.60	28.50	5.59%
			104.91 Walmart Shopping Card		20.00	
	11/27/2013	Sam's Club - Riverdale	Groceries, Medicine	35.44		0.00%
	11/25/2013 11/23/2013	Walmart - Riverdale Walmart - Riverdale	Groceries, Clothing Lamps, Paint, Household items	128.85 73.78	6.77 4.78	5.55% 6.93%
		Sam's Club - Riverdale	Groceries, Clothing, Kitchen Appliance	56.16		0.00%
	1 11/19/2013					//
	11/19/2013 11/15/2013	Walmart - Riverdale	Clothing	28.37	1.77	6.65%

Statement Date	Purchase Date	Store Location	Purchase Description	Amount	Tax	Tax %	
	10/30/2013	Sam's Club - Riverdale	Candy, Medicine, Clothing	65.23	-	0.00%	*
	10/30/2013	Sam's Club - Riverdale	Halloween Candy, Broom	104.62	-	0.00%	*
11/2/2013	11/2/2013		Interest and Late Fee	64.63	n/a	n/a	╛
		Walmart - Riverdale	Clothing	33.76	2.22	7.04%	- ↓
		Walmart - Riverdale	Groceries, Cat 5 Cable	44.87	2.65	6.28%	4
		Sam's Club - Riverdale	Auto Fuel Groceries, \$60 Walmart Shopping Card	51.50	n/a 0.28	n/a	4
		Walmart - Ogden Walmart - Riverdale	(3) \$25 Dennys gift card	69.64 75.00	0.20	2.99% 0.00%	٠.
		Walmart - Riverdale	Groceries, HDMI cable, household items, clothing	119.08	6.30	5.59%	-
		Sam's Club - Riverdale	Groceries	153.69	- 0.50	0.00%	+
	10/2/2013	Sam's Club - Riverdale	Ninja blender, Groceries	188.92	-	0.00%	*
	10/1/2013	Sam's Club - Riverdale	Groceries	68.40	-	0.00%	*
	10/1/2013	Sam's Club - Riverdale	Groceries	121.38	-	0.00%	*
10/2/2013	10/2/2013		Late Fee	39.99	-	0.00%	*
	9/21/2013	Sam's Club - Riverdale	Auto Fuel	51.50	n/a	n/a]
	9/7/2013	Sam's Club - Riverdale	Auto Fuel	51.50	n/a	n/a]
	9/2/2013	Sam's Club - Riverdale	Auto Fuel	51.50	n/a	n/a	
	9/2/2013	Walmart - Riverdale	Automotive	279.30	18.26	7.00%	_
	9/2/2013	Walmart - Riverdale	Groceries, Household Items	154.55	5.21	3.49%	4
0/0/0040	8/31/2013	Sam's Club - Riverdale	Auto Fuel	51.50	n/a	n/a	4
9/2/2013	9/2/2013	N/ 1	Interest	18.97	n/a	n/a	4
	8/18/2013	Walmart - Riverdale	School Supplies, Household Items, Groceries, Rug, Clothing	130.36	7.52	6.12%	4
	8/10/2013	Sam's Club - Riverdale	Auto Fuel	51.50	n/a	n/a	┨,
	8/8/2013	Sam's Club - Riverdale	Groceries Crossias Dist Food Vitamins	136.00	-	0.00%	┤ ゚
8/2/2013	8/5/2013 8/2/2013	Sam's Club - Riverdale	Groceries, Diet Food, Vitamins	80.80 29.07		0.00%	┤
0/2/2013	7/21/2013	Walmart - Riverdale	Interest Lanton Computer Mouse	323.75	n/a	n/a 7.05%	+
	7/21/2013	Sam's Club - Riverdale	Laptop Computer, Mouse Auto Fuel	51.50	21.32 n/a		-
		Walmart - Riverdale		319.01	21.01	n/a 7.05%	-
	7/14/2013	Walmart - Riverdale	Computer (Gateway mini tower)	51.02	3.36	7.05%	+
	7/14/2013	Walmart - Riverdale	Clothing Groceries, Pool Supplies, Household Items	75.41	4.04	5.66%	+
	7/11/2013	Sam's Club - Riverdale	Groceries, Medicine, Pool Supplies	324.57	4.04	0.00%	┤ *
	7/4/2013	Walmart - Riverdale	Drinks, Swimming Supplies, Clothing	43.19	2.73	6.75%	+
	6/30/2013	Sam's Club - Riverdale	Cheesecake, Shoes	44.31	2.39	5.70%	1
7/2/2013	6/22/2013	Walmart- Evanston WY	Treats	2.70	0.10	3.85%	┪.
1,2,2010	6/20/2013	Walmart - Riverdale	Swimming Pool and Pool Supplies	298.54	19.66	7.05%	1 '
	6/16/2013	Sam's Club - Riverdale	Groceries, Propane, BBQ Grill, BBQ Griddle, \$53.88 Walmart gift card	593.00	-	0.00%	*
	6/12/2013	Walmart - Riverdale	Groceries	14.17	0.41	2.98%	*:
	6/9/2013	Walmart - Riverdale	Groceries, Computer Game	63.69	3.03	5.00%	1
	6/8/2013	Sam's Club - Riverdale	Newborn Diapers, Wipes, and Clothing, Books, Treats	144.58	9.52	7.05%	1
	6/8/2013	Walmart - Riverdale	Baby Items, Hallmark Card, Clothing	33.84	2.04	6.42%]
	6/7/2013	Walmart - Riverdale	Groceries, Household Items, Beer, Curtains, Vacuum, Pet Supplies	431.34	25.45	6.27%	
	6/3/2013	Walmart - Richland TX	\$175 Walmart Gifts Card, Medicine, Dishes	193.84	1.17	6.62%	_ +
6/2/2013	5/28/2013	Walmart - Richland TX	Walmart Gift Card	100.00	n/a	n/a] +
	5/28/2013	Walmart - Richland TX	Groceries, Cigarettes, Clothing, Makeup	106.05	5.40	5.37%	_ +
	5/14/2013	Sam's Club - Riverdale	Groceries, Bedding, Pet Supplies	366.44	-	0.00%	*
	5/14/2013	Sam's Club - Riverdale	Portable A/C, Carpet Cleaner	453.94	-	0.00%	*
	5/11/2013	Walmart- Evanston WY	Paint and Supplies	30.16	1.44	5.01%	4
	5/9/2013	Walmart - Riverdale	Groceries, Clothing, Pet Supplies	180.38	10.74	6.33%	4
	5/5/2013	Walmart - Evanston WY	Jigsaw Tool, Wall Texture Spray, Wallpaper Supplies	91.41	4.35	5.00%	- 1
E 10 10 5 · ·	5/4/2013	Sam's Club - Riverdale	Auto Fuel	60.12	n/a	n/a	4
5/2/2013	4/28/2013	Walmart - Riverdale	Groceries, HDMI Cable, Clothing, Curtains, Miscellaneous	187.80	10.91	6.17%	4
	4/27/2013	Sam's Club - Riverdale	Auto Fuel	52.01	n/a	n/a	4
	4/27/2013	Walmart - Riverdale	Groceries, Tools, Household Items	116.61	6.41	5.82%	-
	4/26/2013	Walmart - Riverdale	Tarp, Windshield Wipers, Batteries, Sunglasses	67.93	4.47	7.04%	┨.
	4/24/2013	Sam's Club - Riverdale	Auto Fuel Greening	24.02	n/a	n/a	┤ ゚
	4/23/2013	Sam's Club - Riverdale Walmart - Harrisville	Groceries Clothing	94.89	2.69	0.00%	┤
	4/18/2013 4/14/2013	Walmart - Riverdale	Groceries, Clothing Groceries, Clothing	45.51 112.69	7.21	6.28% 6.84%	+
	4/8/2013	Sam's Club - Riverdale	Auto Fuel	44.25		6.84% n/a	+
	4/8/2013	Walmart - South Ogden	Groceries, Household Items	100.97	3.98	4.10%	+
4/2/2013	3/28/2013	Sam's Club - Riverdale	Auto Fuel	36.16	3.98 n/a	4.10% n/a	+
71212013	3/28/2013	Walmart - Riverdale	(2) \$20 Pizza Hut gift cards, (2) \$20 Walmart gift cards,	236.08	10.23	4.53%	1
	3/27/2013	Walmart - Riverdale	Cleaning Supplies, Paint Supplies Door knobs, Rug, Painting Supplies	71.77	4.73	7.06%	-
	JIZ11ZU13	vvaimait - Niverdale	Groceries, Household Items, Newborn Baby Supplies,				1
	3/23/2013	Sam's Club - Riverdale		248.06	13.77	5.88%	
	3/23/2013 3/23/2013	Sam's Club - Riverdale Sam's Club - Riverdale	Utensils, Pet Supplies Cigarettes	248.06 42.98	2.83	5.88% 7.05%	-

Statement Date	Purchase Date	Store Location	Purchase Description	Amount	Tax	Tax %
	3/16/2013	Walmart- Riverdale	Groceries, CD, Easter Items, Clothing, Xbox Headset, Power Inverter	152.04	9.11	6.37%
	3/10/2013	Walmart- Ogden	Groceries, Household Items, Clothing	80.85	4.94	6.51%
	3/3/2013	Sam's Club - Riverdale	Groceries, Household Items, Bedding, Dog Bed	279.96	13.45	5.05%
/2/2013	2/26/2013	Sam's Club - Riverdale	Pull ups	29.98	-	0.00%
	2/26/2013	Sam's Club - Riverdale	Clothing, Pet Supplies, Mattress Pad, Facial Scrubber Appliance	137.38	-	0.00%
	2/2/2013	Sam's Club - Riverdale	Auto Fuel	31.98	n/a	n/a
	2/2/2013	Sam's Club - Riverdale	Groceries, Clothing	65.54	-	0.00%
	2/2/2013	Walmart - Riverdale	Groceries, Batteries, Baby Items, Clothing	108.34	-	0.00%
2/2/2013	2/2/2013		Interest	31.00	n/a	n/
1/2/2013	1/2/2013		Interest and Late Fee	70.80	n/a	n/
	12/28/2012	Walmart - Ogden	Groceries, Clothing	72.28	3.86	5.64%
	12/28/2012	Walmart - Ogden	Nook and protection plan	232.93	14.93	6.859
		Sam's Club - Riverdale	Clothing, Groceries, Kitchen Supplies	260.32	-	0.009
		Walmart - Riverdale	Groceries, Knitting Machine	99.33	4.33	4.569
		Sam's Club - Riverdale	Pet Supplies, Groceries, Clothing	393.56	23.47	6.349
		Sam's Club - Riverdale	Clothing, Snacks	75.94	4.27	5.969
		Sam's Club - Riverdale	Groceries, Clothing, Household Items	66.32	3.22	5.109
		Walmart - Ogden	Toys, Household items, Movies, Bedding, Groceries	152.14	9.35	6.559
		Walmart -South Ogden	Groceries, Household Items	22.65	1.27	5.949
10/0/0040		Walmart - Riverdale	Groceries Toyo Bet Crete	90.22	4.25	4.949
12/2/2012		Walmart - Riverdale	Toys, Pet Crate	79.92	4.54	6.029
	-	Walmart - Riverdale	Clothing, Toys	33.15	2.18 1.97	7.049
		Walmart - Ogden Walmart - Harrisville	Toys Household Supplies Clothing	30.68		6.86° 6.67°
		Sam's Club - Riverdale	Household Supplies, Clothing Holiday Tree, Wrapping Paper, Pillows, Kitchen Supplies	67.64 146.57	4.23 9.65	7.05
		Walmart - Ogden	Groceries, Game Cash Card, Xbox Subscription, Xbox Games, Clothing, Movies, Blu-ray player, Portable DVD player, \$158.14 Walmart Shopping Card	657.88	26.76	4.24
	11/22/2012	Walmart - Ogden	(2) Nook tablets	211.56	13.56	6.85
		Sam's Club - Riverdale	Auto Fuel	25.23	n/a	n,
		Sam's Club - Riverdale	Groceries	141.21	-	0.00
		Walmart - Burley ID	Groceries	56.73	2.09	3.83
	11/17/2012	Sam's Club - Riverdale	Auto Fuel	44.51	n/a	n,
	11/17/2012	Walmart - Riverdale	Groceries, Pet Supplies, Household Items	45.03	2.81	6.66
	11/17/2012	Walmart - Burley ID	Groceries, Clothing	24.55	1.39	6.00
	11/13/2012	Sam's Club - Riverdale	Groceries, Clothes	63.83	-	0.00
	11/3/2012	Sam's Club - Riverdale	Cigarettes, Electronics, Groceries, Clothing	204.86	11.61	6.01
	10/31/2012	Walmart - Ogden	Household Items	6.95	0.31	4.67
1/2/2012	10/29/2012	Walmart - Harrisville	Xbox Game, Groceries	93.79	2.58	2.83
	10/28/2012	Walmart - Riverdale	Groceries, Clothes	107.91	6.04	5.93
	10/17/2012	Walmart - Anaheim	(2) \$50 Amex Gift Cards, Clothing, Disney Merchandise	213.05	6.83	3.31
		Sam's Club - Riverdale	Cigarettes	88.79	5.85	7.05
		Sam's Club - Riverdale	\$100 MasterCard, \$50 Disney Gift Card, Medicine, Groceries	240.82	2.26	0.95
	10/5/2012	Sam's Club - Riverdale	Groceries, Household Items	87.07	-	0.00
		Walmart - Riverdale	Groceries, Paint Supplies	78.87	5.16	7.00
		Walmart - Riverdale	Automotive	304.93	19.75	6.93
10/0/55:	10/3/2012	Sam's Club - Riverdale	Mattress and Box spring, Cookies, \$50 Disney Gift Card	690.83	-	0.00
0/2/2012	10/2/2012	0 1 0 1 -	Interest	27.95	n/a	n,
		Sam's Club - Riverdale	Candy	26.51	- 4.00	0.009
		Walmart - Harrisville	Groceries, Candle	47.30	1.90	4.19
	9/8/2012	Sam's Club - Riverdale	Groceries, Rugs, Clothing	119.40	0.40	0.00
0/2/2042	9/8/2012	Walmart Layton	Furniture, Snacks, Pillow	130.36	8.19	6.70
9/2/2012		Walmart - Layton Walmart - Riverdale	\$50 AMEX Gift Card, Water bottle	56.16	0.04 7.55	0.079
		Sam's Club - Riverdale	Clothing, Medicine, Groceries Pillows, Household Items	119.16 211.80	7.55	6.76°
		Sam's Club - Riverdale Sam's Club - Riverdale	Groceries, Mattress	462.18	-	0.00
		Sam's Club - Riverdale	Cigarettes	44.34	2.92	7.05
	8/12/2012	Sam's Club - Riverdale	Groceries	115.52	۷.۵۷	0.00
	†	Walmart - Riverdale	Groceries	130.27	4.24	3.36
		Walmart South Ogden	Groceries	42.01	1.92	4.79
	8/4/2012	Walmart - Riverdale	Curtains, Rug, Towels, Household Items	194.77	12.77	7.02
8/2/2012	7/23/2012	Sam's Club - Riverdale	Groceries	186.72	14.11	0.00
JI _ I _ U I _		Walmart - Riverdale	Groceries	65.72	2.92	4.65
	7/14/2012	Sam's Club - Riverdale	Groceries	114.78		0.00
		Sam's Club - Riverdale	Groceries	208.89		0.00
	7/14/2012	Sam's Club - Riverdale	23" Touchscreen All in One PC with protection plan	658.88	_	0.00
	7/14/2012	Sam's Club - Riverdale	Groceries	53.10	-	0.00
		Walmart - Riverdale	Groceries, Household Items, Step Ladder, Memory Card	95.89	5.61	6.21
	†	Sam's Club - Riverdale	Groceries, Cleaning Supplies	66.28		0.00
	6/30/2012	Daili 3 Olub Kivekikiki				

Statement Date	Purchase Date	Store Location	Purchase Description	Amount	Tax	Tax %
Date	6/26/2012	Walmart - Riverdale	Xbox Game with protection plan, Rugs, Household Items	68.81	4.53	7.05%
	6/17/2012	Walmart - Clinton	Recliner, Household Items	84.87	11.28	15.33%
	6/16/2012	Sam's Club - Riverdale	Clothing, Groceries	67.73	2.40	3.67%
	6/16/2012	Sam's Club - Riverdale	Electric Smoker	301.76	-	0.00%
	6/14/2012	Walmart - Riverdale	Clothing, Groceries	53.19	3.47	6.98%
	6/3/2012	Walmart - Riverdale	Gardening Supplies	258.94	17.05	7.05%
	6/2/2012	Walmart - Riverdale	Tools, Sewing, Window A/C Unit	141.64	9.33	7.05%
	6/2/2012	Walmart - Riverdale	Gardening Supplies, Clothing	140.95	9.28	7.05%
6/2/2012	5/24/2012	Walmart - Riverdale	Groceries, Household Items, Storage Items	101.13	6.05	6.36%
	5/19/2012	Walmart - Ogden	Groceries	51.57	1.50	3.00%
	5/13/2012	Sam's Club - Riverdale	Cigarettes, Groceries, Clothing, Pet Supplies, Household Items	240.36	13.51	5.96%
	5/6/2012	Walmart - Ogden	Groceries, Household Items	19.79	1.18	6.34%
	5/2/2012	Sam's Club - Layton	Groceries, Cooking Utensils	54.09	-	0.00%
	5/2/2012	Sam's Club - Riverdale	Groceries, Garden Hose, Clothing, Utensils	179.19	-	0.00%
5/2/2012	5/2/2012		Interest	38.59	n/a	n/a
	4/29/2012	Sam's Club - Riverdale	Groceries, Medicine	109.07	3.85	3.66%
	4/29/2012	Sam's Club - Riverdale	Cigarettes, Electronics, Medicine, Kitchen Appliance with protection plan	253.02	-	0.00%
	4/8/2012	Walmart - Riverdale	Xbox Games, Clothing, Cigarettes	63.75	4.20	7.05%
	4/5/2012	Walmart - Riverdale	Xbox Controller, Xbox Game, Groceries	202.42	10.69	5.58%
4/2/2012	3/21/2012	Walmart - Ogden	Mattress	349.00	-	0.00%
	3/21/2012	Walmart - Ogden	Cigarettes, Groceries, Pillows	94.69	5.71	6.42%
	3/10/2012	Walmart - Ogden	Groceries, Household Items	130.93	4.77	3.78%
3/2/2012	3/2/2012		Interest	19.99	n/a	n/a
	2/18/2012	Walmart - Ogden	Groceries, Cigarettes	89.22	4.19	4.93%
2/2/2012	2/2/2012		Interest	30.89	n/a	n/a
	1/28/2012	Walmart - Ogden	Groceries, Cleaning Supplies, Cigarettes	147.25	6.61	4.70%
	1/4/2012	Walmart - Harrisville	Groceries, Toys	80.74	5.14	6.80%
	1/3/2012	Walmart - Riverdale	Groceries	60.32	2.22	3.82%
1/2/2012	12/23/2011	Walmart - Riverdale	Movies, Xbox game, Groceries, Holiday Supplies	149.88	9.54	6.80%
	12/23/2011	Walmart - Ogden	Xbox Game, Kindle Fire with protection plan	287.38	18.42	6.85%
	12/23/2011	Walmart - Ogden	Groceries	74.80	4.63	6.60%
	12/18/2011	Walmart - Ogden	Groceries	64.75	1.89	3.01%
	12/11/2011	Walmart - Riverdale	Automotive	72.34	6.38	9.67%
	12/2/2011	Walmart - Riverdale	Groceries, Movies, Books	78.37	4.01	5.39%
12/2/2011	11/27/2011	Walmart - Riverdale	Groceries, Holiday supplies	74.01	4.10	5.86%
	11/25/2011	Walmart - Riverdale	Clothes, Xbox Subscription	258.95	16.26	6.70%
	11/21/2011	Walmart - Ogden	Groceries, Clothing, Laundry Detergent	136.30	-	0.00%
	11/13/2011	Walmart - Riverdale	Groceries, Movie	112.79	5.10	4.74%
			Total	43,672.33		

⁺ Purchase Made Out of State

^{*} Transaction Tax Exempt

^{**} Partial Transaction Tax Exempt

Personal Purchases using USDB Kroger/Smith's Credit Account

All purchases were made using a Fresh Value Card in the Name of the Former Analyst's husband

Purchase	Purchase Description	Amount	Tax	Tax %	
Date	r dichase bescription	Amount	Iax	I ax /o	
Kroger Accou	int XXXXXXXXXXX6074				
2/4/2016	\$500 Visa Gift Card	505.95	-	0.00%	*
12/29/2015	\$500 Visa Gift Card, Groceries	522.43	-	0.00%	*
9/20/2015	Groceries	84.70	-	0.00%	*
9/16/2015	\$200 Visa Gift Card	205.95	-	0.00%	*
9/14/2015	Groceries	24.93	-	0.00%	*
9/9/2015	Groceries, Medicine, Crafts	85.88	-	0.00%	*
9/1/2015	Coffee Maker, Groceries, (2) \$250 MasterCard Gift Cards	555.83	-	0.00%	*
8/26/2015	\$25 Visa Gift Card, \$25 Starbucks Gift Card, Groceries	72.70	-	0.00%	*
8/25/2015	Groceries	114.27	-	0.00%	*
8/23/2015	Mop, Groceries, \$100 Visa Gift Card	167.78	-	0.00%	*
8/23/2015	School supplies	15.86	-	0.00%	*
8/21/2015	\$450 Visa Gift Card	455.95	-	0.00%	*
8/20/2015	\$500 Visa Gift Card, Treats	510.34	-	0.00%	*
8/15/2015	Hair Products, Treats, \$50 Olive Garden Gift Card, \$500 Visa Gift Card	574.58	-	0.00%	*
8/10/2015	Gum, \$25 McDonalds Gift Card, \$200 Visa Gift Card	233.88	ı	0.00%	*
8/10/2015	Groceries, Clothing, Cleaning Supplies	296.72	ı	0.00%	*
8/9/2015	Groceries	16.22	ı	0.00%	*
8/6/2015	Groceries (\$80 of steak), \$250 Visa Gift Card	335.31	1	0.00%	*
7/29/2015	Groceries, Medicine	39.50	1	0.00%	*
7/25/2015	Small Kitchen Appliances, \$150 Visa Gift Card, Groceries, Household	293.44	1	0.00%	*
7/13/2015	Groceries	48.35	ı	0.00%	*

Groger Account XXXXXXXXXXXX6009			
12/24/2015 \$500 Visa Gift Card, Clothing, Household Items	538.25	-	0.00%
12/24/2015 \$50 Amazon Gift Card, (2) \$25 McDonald's Gift Cards, Groceries, Clothing	197.11	-	0.00%
12/22/2015 Plush Animal	9.61	-	0.00%
12/22/2015 \$400 Visa Gift Card	406.88	-	0.00%
12/22/2015 Clothing, Makeup, Treats, Small Appliances	267.67	-	0.00%
11/26/2015 \$300 Visa Gift Card, \$300 Target Gift Card, \$200 Macys Gift Card	805.95	-	0.00%
11/25/2015 Groceries, Mattress Topper	157.71	-	0.00%
11/18/2015 \$250 Visa Gift Card, Hallmark Card, Plant	284.24	-	0.00%
11/10/2015 Groceries	64.21	-	0.00%
10/4/2015 Vacuum, Treats	20.39	-	0.00%
10/3/2015 \$50 BedBath&Beyond Gift Card, Wedding Hallmark Card, Shoes	102.36	-	0.00%
10/3/2015 \$40 Visa Gift Card, Hallmark Cards, Toys	77.95	-	0.00%
9/27/2015 Dishes, Groceries	81.01	-	0.00%
9/5/2015 Groceries	31.02	-	0.00%
9/3/2015 \$300 MasterCard Gift Card, Bottled Water	306.98	-	0.00%
9/2/2015 \$50 Visa Gift Card, Groceries	71.31	-	0.00%
9/2/2015 \$50 Visa Gift Card, Groceries	105.73	-	0.00%
7/12/2015 Groceries	34.20	-	0.00%
7/10/2015 \$25 Starbucks Gift Card, \$200 Visa Gift Card, Snacks	235.14	-	0.00%
Carpet Cleaner, Rugs, Shoes, Switch Blade, Bud Light, Lamp, Art, Pet			0.000/
7/10/2015 Supplies, Household Items, Snacks	359.26	-	0.00%
\$250 Vice Cift Card, \$40 McDonalde Cift Carde, Dichae, Organizare, Bot			0.000/
7/1/2015 Supplies, Groceries	343.60	-	0.00%
7/1/2015 \$25 Red Lobster Gift Card, \$250 Visa Gift Card, Treats	315.73	-	0.00%
6/29/2015 Groceries	40.57	-	0.00%
6/24/2015 (2) \$250 Visa Gift Cards	511.90	-	0.00%
6/24/2015 Treats	2.67	-	0.00%
6/21/2015 Groceries, Dishes, Pet Supplies, Rug	232.26	-	0.00%
6/18/2015 Groceries	52.87	_	0.00%
6/15/2015 Groceries, Household Items	15.25	-	0.00%
6/13/2015 Toys, Hallmark card, Makeup, Beverage Dispenser	127.78	-	0.00%
5/30/2015 \$200 Visa Gift Card, Groceries	278.25	-	0.00%
5/28/2015 Groceries	97.64	-	0.00%
5/19/2015 Medicine, Groceries	26.51	-	0.00%
5/11/2015 ***	316.51	-	0.00%
4/30/2015 ***	100.85	-	0.00%
Total			2.2370

^{***} We were unable to obtain the detail purchases behind these transactions. However, since all other transactions purchased with the same Fresh Value Card were determined fraudulent purchases and supporting documentation is missing it is reasonable to conclude that all others are as well.

Purchase Date	Purchase Description	Amount	Tax	Tax %
SDB Receipts	s Purchased Using Kroger Account XXXXXXXXXXXX6009 and Fresh V	/alue Card XXXX	XXX6052	
	\$300 Visa Gift Card, \$40 Smiths Gift Card	345.95	n/a	n/a
	Groceries, Medicine, Pet Supplies, \$25 McDonalds Gift Card, \$15 Little Caesars Gift Card	80.75	2.20	5.40%
	Groceries, Household Items, DVD, \$50 Visa Gift Card	121.45	3.24	4.53%
	Groceries, Pet Supplies, Household Items	31.40	1.49	4.75%
	Groceries, Pet Supplies, Household Items	74.27	4.00	5.39%
	Groceries, Pet Supplies, Household Items, Food Processor	246.50	4.78	1.94%
	Groceries, Clothing, Wall Art, Food Processer, Newborn Baby Items,	520.00	29.92	6.23%
2/9/2013		57.67	3.70	6.42%
	Groceries, Medicine	27.14	1.32	4.86%
10/00/0010	Groceries Razor Medicine Household Items Reer Holiday Décor	288.08	13.84	4.80%
12/23/2012	\$360 Visa Gift Card	365.95	n/a	n/a
	Groceries, Game, Watch, Clothing, Rug	250.31	15.95	6.37%
	\$25 Justice Gift Card, \$50 Best Buy Gift Card, \$200 Visa Gift Card	280.94	n/a	0.57 /0 n/a
12/17/2012		80.97	2.36	2.91%
40/40/0040	Groceries Household Items \$25 Kohl's Gift Card	84.10	1.40	4.11%
	Groceries, Household Items, Wrapping Paper, \$50 Amazon Gift Card	224.45	7.00	4.400/
		224.15	7.80	4.48%
	\$25 Smiths Gift Card, Treats	63.73	1.70	4.39%
	Groceries, Household Items	52.93	2.48	4.69%
	Groceries, Household Items	53.55	2.08	3.88%
11/7/2012		26.01	0.76	2.92%
	Groceries, Household Items	135.39	6.98	5.16%
	\$425 Visa Gift Card, Microwave	458.72	1.78	5.28%
	Groceries, Makeup, \$25 Disney Gift Card, \$25 Visa Gift Card	106.24	1.99	3.54%
	Groceries, Pet Supplies, \$50 Disney Gift Card	70.21	0.78	3.86%
	Groceries	48.03	1.40	2.91%
	\$30 Subway Gift Card	30.00	n/a	n/a
	Groceries	112.30	3.85	3.43%
3/28/2012	Groceries	21.13	0.62	2.93%
3/27/2012	Groceries	48.50	1.47	3.03%
3/14/2012		77.84	0.00	0.00%
	Groceries, Household Items	72.31	4.24	5.86%
	Groceries, DVD	27.69	1.48	5.34%
	Groceries, Pet Supplies, \$15 Subway Gift Card	57.64	2.04	4.78%
	Groceries, Flowers, Card	19.23	0.77	4.00%
	\$25 Amazon Gift Card, \$50 Visa Gift Card, Snack	99.77	0.58	2.34%
	Groceries, Medicine, \$50 Visa Gift Card	89.06	1.42	3.64%
	Groceries, Pet Food	144.86	5.22	3.60%
1/30/2012		24.64	0.72	2.92%
	Groceries, Household Items	41.74	2.48	5.94%
1/22/2012		69.89	0.00	0.00%
	Groceries, Pet Supplies	58.08	2.18	3.75%
12/28/2011		38.50	1.12	2.91%
	Groceries, Household Items	24.72	1.12	4.33%
12/19/2011		23.01	0.89	3.87%
	Groceries, Pet Supplies	34.70	1.14	3.29%
	Snacks, Medicine	22.12		5.74%
			1.27	
11/16/2011		39.45	1.47	3.73%
11/8/2011	Groceries, Pet Supplies	37.12	1.86	5.01%
	Groceries, Medicine, Clothing	128.40	4.94	3.85%

^{*} Transaction Tax Exempt
** Partial Transaction Tax Exempt

The following USDB payments made using the Donation account were likely misappropriation based on review of transactions and supporting information for the following payments:

Check #	Check Payee	Check Date	Check Amount	Report Discrepancies
5054	Kroger Smith's	9/23/2013	1,258.68	Check not listed on report; amount added to another check on report
5073	Kroger Smith's	10/23/2013	1,575.48	Split into two checks and reported to different payees
		Total	2,834.16	

Total Kroger/Smith's likely misappropriations 20,051.24

Differences Between Bank Checks and Account System Records for the Donation Account

Amount	Bank Check #	Bank Check Date	Bank Check Payee	QuickBooks Check #	QuickBooks Check Date	QuickBooks Check Payee
1,697.76	5191	3/4/2016	Samsclub - Walmart	5191	1/11/2016	USDB
652.08	5212	2/8/2016	Samsclub - Walmart	5212	1/21/2016	Sams Club
644.25	5347	1/21/2016	Kroger Smith's	5346	1/14/2016	Red Star Transportation
1,652.89	5339	12/20/2015	Samsclub - Walmart	5339	12/16/2015	Christpoherson Business Travel
694.75	5342	12/16/2015	Kroger Smith's Charges	5342	12/16/2015	Toys for Special Children
1,686.02	5344	11/30/2015	Kroger Smith's Charges	5344	11/30/2015	USDB
2,597.70	5288	8/5/2015	Samsclub - Walmart	5288	7/16/2015	Enpointe Technologies
903.77	5275	5/19/2015	Sams Club	5280	5/19/2015	Enpointe Technologies

[✓] Bank check date after Former Analyst's USDB employment ended.

Missing Cash Receipts

Document Date	Document Explanation	Document Amount	Receipt Date	Receipt Totals	Difference
6/5/2015	Yearbook sales	1,168.00	6/11/2015	-	1,168.00
5/20/2015	Memory Box	495.00	None	-	495.00
2/2/2015	Memory Box	202.00	None	-	202.00
11/24/2014	Memory Box	422.50	None	-	422.50
9/15/2014	JMS: Vending Proceeds	143.82	None	-	143.82
6/3/2014	JMS: Drama Donations, SBG Donation	246.10	6/27/2014	161.10	85.00
3/13/2014	JMS: Academic Bowl Storytelling Fundraiser, Academic Bowl Donations	648.25	3/13/2014	321.25	327.00
2/21/2014	JMS: Science donations, Kroger donation, Athletic Fee, Shirt Purchase	8,865.04	2/21/2014	8,825.04	40.00
2/4/2014	JMS: Fundraiser, Lifetouch, Vending Earnings, Anonymous Donation, Shirts, Lunch	1,421.75	2/5/2014	243.00	1,178.75
1/7/2014	Memory Box	475.50	None	-	475.50
				Total	3,369.57

^{*} A receipt was written on 6/11/2015 for \$1,169.00 for this receipt; however the amount was excluded from the bank deposit.

Days Between Deposits

	Days Between		
Receipt Start Date	Deposit dates	Deposit	
1/5/2016	1/19/2016	14	
12/18/2015	12/31/2015	13	
10/26/2015	12/16/2015	51	
8/29/2015	10/14/2015	46	
7/1/2015	8/31/2015	61	
6/4/2015	6/30/2015	26	
5/5/2015	5/29/2015	24	
4/13/2015	5/5/2015	22	
2/26/2015	4/13/2015	46	
2/2/2015	2/27/2015	25	
1/6/2015	2/4/2015	29	
11/1/2014	12/22/2014	51	
10/20/2014	11/25/2014	36	
9/26/2014	10/29/2014	33	
8/20/2014	9/26/2014	37	
7/9/2014	8/18/2014	40	
6/27/2014	6/30/2014	3	
6/27/2014	6/27/2014	0	
5/8/2014	6/18/2014	41	
4/23/2014	5/8/2014	15	
3/13/2014	4/23/2014	41	
2/20/2014	3/18/2014	26	
1/13/2014	2/18/2014	36	
12/18/2013	2/18/2014	62	
11/22/2013	1/10/2014	49	
10/11/2013	11/27/2013	47	
10/9/2013	10/28/2013	19	
9/27/2013	10/28/2013	31	
9/5/2013	9/16/2013	11	
7/1/2013	8/28/2013	58	
5/14/2013	6/28/2013	45	
3/27/2013	5/14/2013	48	
2/26/2013	3/21/2013	23	
1/22/2013	2/28/2013	37	
12/6/2012	1/18/2013	43	
10/12/2012	12/7/2012	56	
10/12/2012	11/20/2012	39	
8/30/2012	10/10/2012	41	
7/10/2012	8/22/2012	43	
5/16/2012	6/29/2012	44	
4/16/2012	5/14/2012	28	
3/16/2012	4/12/2012	27	
2/7/2012	3/23/2012	45	
1/4/2012	2/7/2012	34	
Average Days	Between Deposits	35.14	

USDB Response to Audit Report No. DBS-16-SP2

OVERVIEW

Over the past three years, the new administration at the Utah Schools for the Deaf and the Blind (USDB) has aggressively restructured operations in the business office, including the creation of new policies and training employees with internal controls designed specifically to eliminate opportunities for fraud, waste, and abuse throughout the agency. Among the many improvements during this time, the USDB financial analyst and the USDB purchasing agent were clearly assigned key duties for oversight of agency spending and two external audits were requested by USDB and completed on the USDB donated funds account because of concerns about potential risk for abuse. Unfortunately, at least one of the employees responsible for purchasing oversight abused her position of trust, resulting in the theft of money donated to USDB for Deaf and Blind children.

The sophisticated methods used to obscure the fraudulent activity in that account prevented staff members and external auditors from discovering the theft earlier. Despite the special scrutiny and audit work on the donated funds account since 2013, the theft continued until early 2016 when it was discovered by a new and very astute staff member in the business office. The recently discovered theft occurred over several years and started well before the current USDB administration improved the system.

Public Trust is paramount at USDB. The theft of funds donated to Deaf and Blind children is an extremely serious matter and USDB recognizes that it impacts the level of trust towards the entire organization. Consequently, the USDB superintendent notified the State Auditor immediately when suspicious transactions were discovered. USDB has also reported the theft to law enforcement authorities and will provide any assistance possible, including this audit report, to prosecute those responsible to the full extent of the law.

USDB concurs generally with the findings of this audit. In addition to the findings contained within the scope of this review, USDB also requests additional consideration of the events and conditions that led up to the discovery of the theft. For example, findings including the phrase "inadequate controls" accurately describe the pre-2013 condition of the agency - in fact, there were essentially *no internal controls in place* prior to July 2013. After the new leadership was appointed, however, the implementation of comprehensive system of financial controls is clearly documented. The theft continued because those controls were circumvented by the dishonest person or persons responsible for implementing them.

Additionally, the audit does not consider the impact of the attrition of key personnel responsible for the implementation, monitoring, and testing of the internal controls. During the 16 month tenure of the former Finance Director, USDB had a high level of transparency and accountability. The implementation of controls uncovered improper use of state fleet resources, fraudulent time card approvals, and resulted in the dismissal of underperforming employees. Not surprisingly, a subsequent increase in the pattern of donated funds theft correlated directly

with the assignment of the Finance Director to another Board-governed agency under financial distress, temporarily diminishing the internal business capacity for purchasing oversight.

While this theft is certainly a cause for great concern, the public and other USDB stakeholders can be assured that USDB continues to implement, monitor, and test financial controls. As a direct result of the new leadership team and a completely new staff in the business office, USDB is finally in a position to ensure proper control and management of its funding into the future. In fact, the discovery of the theft in this instance is directly attributable to the new staff implementing the 2013 controls with fidelity. Although theft of student funds by a previously trusted employee is alarming and somewhat embarrassing, this discovery is actually a testament to the improved conditions and the effectiveness of the current control environment throughout the agency.

These introductory "overview" comments are not intended to be excuses. They are included to demonstrate both the initial and ongoing resolve by USDB leadership to implement controls and best practices that did not exist previously, and to show that the theft was only possible because of the unique circumstances that existed during this window of opportunity created by an unlikely confluence of events. Under the current standard operating circumstances at USDB, theft by unscrupulous employees would almost certainly be prevented.

FINDINGS AND RECOMMENDATIONS

RECOMMENDATION 1: "We recommend that USDB avoid using credit cards and wisely use p-cards, when appropriate."

USDB RESPONSE: USDB concurs with this recommendation. The Smith's/Kroger credit card was deactivated in April 2016, as soon as questionable transactions were discovered. Effective July 14, 2016, all credit cards are prohibited for purchasing at USDB. They will be replaced by state issued P-cards to specific employees for food purchases previously made with the Smith's/Kroger credit cards. USDB will continue to require a list of menus to support the amount of each food purchase for the student cottages and similar approved USDB activities.

In the fall of 2014 the USDB Finance Director recommended the same course of action during a meeting of the USDB Executive team. Steps were being taken towards the deactivation of all credit cards outside of p-cards including both the Smith/Kroger and Walmart/Sam's Club cards. However, in February of 2015 the Finance Director was reassigned to a position of higher responsibility with the State Board of Education. He was not replaced until July of 2015 delaying this action until May of 2016.

RECOMMENDATION 2: "We recommend that USDB implement adequate internal controls (see Finding No. 3 below), including proper separation of duties, to prevent and detect theft. We also recommend that USDB pursue civil litigation to recover the stolen funds and turn the matter over to authorities for criminal prosecution."

USDB RESPONSE: USDB concurs with this recommendation. In April 2016, USDB reviewed, improved, and implemented the following internal controls, in addition to the new oversight and controls implemented by the administration in 2013 by both the new Superintendent and Finance Director at the time:

- 1. Enhanced previous cash receipting internal control policies and procedures by creating a new Cash Chain of Custody forms (see below). This original implementation of this control took place in 2014 under the previous Finance Director. Immediate results were seen from the JMS campus of our operations. The former Finance Director trained on the use of the form and was present when cash receipts were counted by separate personnel in the Business Office.
- 2. On May 3, 2016, The USDB Director of Finance, Letty Debenham, met with the entire Administrative Staff, including the two USDB associate superintendents, program directors, and their respective administrative assistants. She explained the importance of having a clearly documented paper trail when handling cash and trained them on the following specific items:
 - a. improved internal control procedures for cash receipting generally,
 - b. the 3 business day rule for cash,
 - c. the importance of using the required forms,
 - d. A set of new cash receipt books was distributed to each director with instructions to use them for any cash or checks received on behalf of USDB.
- 3. On May 4, 2016, the USDB Director of Finance, Letty Debenham, personally trained the Ogden school job coach and the secretary responsible for the collection of cash. The meeting specifically addressed money collected from the school vending machines and memory box fund raising projects, which exist for the purpose of training blind students how to handle cash. This training was also provided at least twice during 2014. Due to occasional attrition within the ranks of division secretaries and job coaches, the training repeated from time to time.
- 4. Beginning with the upcoming 2016-2017 school year, USDB will reintroduce and re-train the administrative staff, executive support staff, each member of the business office staff and any other employee who handles cash or checks on the new cash receipting procedures, the required forms, and the 3-day cash rule. This extensive cross training will minimize risk associated with certain positions operating without sufficient transparency or potential staff turnover in the future.
- Since March 2016, USDB has re-emphasized and improved the internal controls for Cash/Checks receipting, including the following separation of duties:
 - Director, secretary, or job coach submits cash and checks with attached yellow copies of cash receipts using form CR42016 and a copy of form CRCOUNT42016 to the USDB purchasing agent, completed and signed.
 - b. Purchasing Agent:
 - i. Receives and counts cash and checks, verifies the amounts on form CRCOUNT42016, and acknowledges receipt by signing the form,
 - ii. Provides a copy to the person bringing in the cash
 - iii. Logs the cash and checks

iv. Submits the cash and checks and the signed form to the accountant for deposit.

c. Accountant:

- i. Receives the cash/checks and documentation.
- ii. Reviews the count,
- iii. Signs and acknowledges receipt,
- iv. Prepares bank deposit form,
- v. Makes the deposits each Tuesday and Friday,
- vi. Submits validated deposit slip with documentation to the Financial Analyst to create a CR transaction in FINET.
- d. Financial Analyst reviews the validated cash/check deposits, and attached documents, then creates a CR in FINET.
- e. Director of Finance reviews and approves all CR's in FINET.
- f. Purchasing Agent receives the mailed bank statement, stamps the date we received it, then forwards the document to the accountant.
- g. Accountant is responsible for the monthly bank reconciliation.

Additionally, USDB concurs with the recommendation to recover the funds and seek other legal remedies. USDB has reported the information in this audit to authorities and will pursue civil litigation and the prosecution of the criminals responsible for the theft to the full extent of the law.

RECOMMENDATION 3: "We recommend that USDB adequately separate the duties involving access to accounting records, bank reconciliation, and report preparation to eliminate the potential for manipulation of the USDB Advisory Council report. We also recommend that USDB use an accounting system that does not allow transactions to be reported in the prior period without a clear audit trail that tracks the adjustment."

USDB RESPONSE: USDB concurs with this recommendation. Previously, the business office did not have sufficient dedicated FTE positions to adequately separate duties for an agency with the size and complexity of USDB. Within the past 6 months, USDB resources have been reallocated to add a financial manager position and comprehensively restructure the assignments of each business office employee to remedy this deficiency and provide appropriate separation of duties.

The internal control process for receiving cash/checks into Donated Funds is the same as regular cash/checks received (see response 2). The following process is used for withdrawals from the Donated Funds account:

- Requestor enters into the BASE C8 system the request using appropriate accounting codes: Dept. 400, Fund 9414, Appropriation unit 9214, Unit #5012, Activity code DFxx. Each donated fund will be assigned a unique activity code and object code will use the standard FINET expenditure codes.
- 2. Director approves in the C8 system and forwards to corresponding Associate Superintendent for approval.

- 3. Associate Superintendent approves the request in the C8 system and forwards to the Accountant to review accounting code accuracy, then forwards to the Purchasing Agent
- 4. Purchasing Agent issues the purchase order and forwards to Donated Fund Custodian.
- 5. Donated Fund Custodian process GAX in FINET.
- 6. Accountant approves the GAX.
- 7. At month-end, the Accountant reconciles the bank account and creates a report to the Advisory Council.

RECOMMENDATION 4: "We recommend that USDB implement proper and adequate internal controls and monitor to ensure they are understood and followed by USDB employees. The internal controls should include the following:

4A: "Process all donation account transactions through FINET with a state bank account instead of using QuickBooks for better embedded accounting system controls."

USDB RESPONSE: USDB concurs with this recommendation, and is already engaged in this process. On July 1, 2016 USDB transferred the Donated Funds accounting system to the State of Utah FINET accounting system. In conjunction with this move, the State Treasurer's Office will freeze USDB's Wells Fargo Bank independent bank account and transfer the remaining balance to USDB's PTIF account. Once reconciliation of different donated accounts is completed, the beginning balance for each donated account will be entered by the Division of Finance staff into the FINET system.

4B: "Monitor the credit card and P-card reconciliation process to ensure the reconciliation is performed on all credit cards by an individual separate from the person who makes purchases on the card."

USDB RESPONSE: USDB concurs with this recommendation. Although the audit report indicates there was a potential misunderstanding about this control, there was not. The former Purchasing Agent and the former Financial Analyst performed the following process during the calendar year 2014.

The USDB Purchasing Agent reviews each P-card reconciliation including:

- receipts,
- approval signature,
- comments on why items were purchased and where the purchased items purchased are used,
- verifies accounting codes accuracy, and
- enters IET's into FINET.

In addition to the items listed above, the former Purchasing Agent (who quit shortly before the former Financial Analyst) and the former Financial Analyst accompanied each other with the intent of ensuring the purchases were authorized and properly documented each time the

Sam's Club card was used. Despite this internal control, the following specific instances indicate strategic timing that would make it extremely difficulty to discover the theft:

- The questionable Sam's Club/Wal-Mart transactions identified by the auditor total over \$12,000.00 and \$11,000.00 for the calendar years 2012 and 2013. In calendar year 2014, the first full year under new leadership, the amount of questionable transactions decreases to just over \$7,000.00.
- Items previously identified as questionable in 2012 and 2013 that clearly were not authorized for students (i.e. auto fuel and cigarettes) only occurred during months in 2014 when the Finance Director was on leave for military duty.
- The Financial Analyst made purchases of gift cards for Disneyland immediately following the notification by the former Finance Director that he was moving on to another position with the State Board of Education. (February 2015).
- When reconciliations started to occur consistently under the former Finance
 Director, the Financial Analyst avoided distinct transactions that would trigger
 immediate responses from either the Purchasing Agent or the Finance Director.
 As a result, she apparently disguised the transactions by falsifying records.
- The Financial Analyst admitted to the unauthorized shredding of seven full bags of agency financial records on a weekend, outside normal work hours, shortly before terminating employment at USDB. Reconciliation backups were likely destroyed for the period of 2013-2015 during this event.

4C: "Implement a review process to monitor that pre-approvals occur according to Policy"

USDB RESPONSE: USDB concurs with this recommendation. With the exceptions of utility bills, recurring contract payments, and P-card purchases, all other expenses are approved through the following C8 (purchase order) approval workflow process, and have been since before 2013. The new administration strongly discouraged the use of P-cards, unless it was unavoidable:

- 1. Requestor enters into the BASE C8 system the request using appropriate accounting codes.
- 2. Director approves the request in the C8 system and forwards the request to the supervising Associate Superintendent for approval.
- 3. Associate Superintendent approves the request in the C8 system and forwards it to the Accountant to review accounting code accuracy and forward to the Purchasing Agent.
- 4. Purchasing Agent issues the purchase order. An email is then sent to the originator/requestor indicating the PO number and a notice to proceed with purchase.

4D: "Have an individual with read-only access to the accounting system prepare the Advisory Council reports."

USDB RESPONSE: USDB concurs with this recommendation. With the implementation of using the State FINET accounting system, the USDB Accountant will now prepare the monthly Advisory Council report using the read-only FINET data warehouse information.

4E: "Enlist an individual separate from the person who enters transactions into the accounting system to obtain and review processed checks or copies of checks and account for all checks as part of the reconciliation process. This would include a review of unused checks, checks written out of numerical order, and checks with duplicate check numbers. In addition, we recommend that USDB secure the unused check stock."

USDB RESPONSE: USDB concurs with this recommendation. The USDB Accountant completes the monthly bank reconciliations which includes a review of processed checks by sequential check number and verifies beginning numbers for unused checks.

4F: "Perform adequate reviews of all FINET transactions to ensure propriety."

USDB RESPONSE: USDB concurs with this recommendation. FINET approvers (Accountant & Director of Finance) review the validity and accuracy of accounting codes for transactions being processed for payment, including PO numbers from the C8 approval workflow system.

4G: "Strengthen the cash handling process."

USDB RESPONSE: USDB concurs with this recommendation. See USDB RESPONSE 2, items 5:a-g

RECOMMENDATION 5: "We recommend that USDB ensure that records are secured and retained as required by state record retention laws. We also recommend that USDB consider using FINET to process all their transactions, which would assist them in archiving and safeguarding their financial documents."

USDB RESPONSE: USDB concurs with this recommendation. Effective July 1, 2016, all financial transactions are now processed using the State FINET Accounting system (See USDB RESPONSE 4-A). Even before the Donated Funds account was compromised, USDB administration engaged all administrators and secretarial staff in a complete overhaul of agency and student records, including security and retention as required by law. One of the strengths of the current business office staff is their meticulous attention to detail and improving systems, processes, and policies to reduce risk while improving workflow.

RECOMMENDATION 6: "We recommend that USDB adequately review purchases to ensure employees are properly using USDB's tax exemption status. We also recommend that USDB, pursue civil litigation to recover stolen funds (see recommendation to Finding No. 1), and also attempt to recover the amount of sales tax which should have been paid on personal items."

USDB RESPONSE: USDB concurs with this recommendation. Reconciliations were occurring, although no standard reconciliation is robust enough to detect fraud. Moving the donated funds account to state finance and monitoring with FINET will provide a significantly improved review environment. USDB also concurs with the recommendation to pursue litigation to recover stolen

funds and sales tax, and to seek other legal remedies (see USDB response to RECOMMENDATION 2).

RECOMMENDATION 7: "We recommend that USDB deposit all cash receipts within three banking days in compliance with Utah Code 51-4-1(2). We also recommend that USDB identify opportunities for their campuses to make deposits more timely, such as depositing at local banks or using electronic check depositing/processing at each location."

USDB RESPONSE: USDB concurs with this recommendation and has implemented Utah Code 51-4-1(2) by implementing mandatory deposits twice a week on Tuesdays and Fridays. (See USDB RESPONSE 2, 5-c)

RESPONSE SUMMARY

All of the new implementations and enhancements to prior implementations of internal controls mentioned above will continue to undergo periodic tests of controls by individuals outside USDB (i.e. Utah State Board of Education Internal Auditors or Office of the State Auditor). USDB will also give additional consideration to contingency planning for the potential attrition of key personnel. For example, USDB added an additional staff position to the business office at the beginning of 2016 to facilitate greater separation of duties. In addition, individual employees serving under the Finance Director are now cross trained and prepared to assume the critical roles of their co-workers if employment positions are vacated from time to time due to normal attrition. Most importantly, the Finance Director herself is intimately familiar with the internal controls of the agency and can personally ensure their continuity until any given position is filled.

Preceding discovery of the theft, USDB experienced significant risk over a period of seven years (2009-2015) due to the attrition of four (4) Finance Directors with significant gaps in coverage and additional unusual circumstances in between. Two independent audits were conducted at the request of USDB by both State Finance and Internal Audit of the Utah State Board of Education. Neither audit suspected fraudulent activity, but the pattern of unauthorized and fraudulent transactions makes it clear that the former Financial Analyst strategically exploited these time periods of attrition in the critical position of Finance Director.

According to the COSO [Committee of Sponsoring Organizations of the Treadway Commission] Integrated Framework on Internal Controls, "An internal control system, no matter how well conceived and operated, can provide only reasonable--not absolute--assurance to management and the board regarding achievement of an entity's objectives. The likelihood of achievement is affected by limitations inherent in all internal control systems. These include the realities that judgments in decision-making can be faulty, and that breakdowns can occur because of simple error or mistake. Additionally, controls can be circumvented by the collusion of two or more people, and management has the ability to override the system. Another limiting factor is that the design of an internal control system must reflect the fact that there are resource constraints, and the benefits of controls must be considered relative to their costs."

Time, continuity of personnel and operations, and resources are critical to maximize the effectiveness of the controls that were implemented in 2013. The employee most responsible for the theft identified in this audit has been identified, her employment has been terminated, and USDB will vigorously pursue legal prosecution and appropriate recourse to restore the lost funds. Finally, the current administration at USDB has established the policies and controls and prioritized the resources to prevent the risk associated with financial mismanagement prior to 2013, including the continual implementation, augmentation, and testing of our controls.

ATTACHMENTS:
CASH RECEIPT FORM
CASH/CHECKS COUNT SUMMARY FORM



CASH/CHECK RECEIPT

						DATE:			
Received from:						Amount:	\$		
Purpose:									
Indicate type of	payment:		Cash		Check		Check #:		
Received by:		Name			_		Signature		
							-		
TING CARES	USDE Utah Schools	for The I				т		CR42016	
	CASH/CHECK RECEIPT								
Received from:						DATE: Amount:	\$		
Purpose:									
Unit #: Indicate type of	payment:		Cash		Check		Check #:		
Received by:		Name			_		Signature		

		Unit # Fund Raising Event: Fund Raising Event Name: Donated Fund to Deposit To		Date: _(email copy to Unit Director)		
Please mark what th Vending Mach Memory Box: Donated Fund Lunch Tickets:	n.:					
CHECKS Count:		CASH C	Count:			
Check Numbe	er Amount	De	nomination	Count	Total CASH Amt.	
1	\$0.00	1	\$100		\$0.00	
2	\$0.00	2	\$50		\$0.00	
3	\$0.00	3	\$20		\$0.00	
4	\$0.00	4	\$10		\$0.00	
5	\$0.00	5	\$5		\$0.00	
6	\$0.00	6	\$1		\$0.00	
7	\$0.00	7	\$0.25		\$0.00	
8	\$0.00	8	\$0.10		\$0.00	
9	\$0.00	9	\$0.05		\$0.00	
10	\$0.00	10	\$0.01		\$0.00	
TOTAL	\$0.00			TOTAL	\$0.00	
SUMMARY:		For	r Business Office Use On	ly:		
TOTAL CHECKS	\$0.00	Re	ceived and Counted by:			
TOTAL CASH	\$0.00	Sig	nature:			
TOTAL	\$0.00	Da	te:			
COUNTED BY:		WITNES	SSED BY:			
Name					Name	
 Signature					Signature	