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**NEWS RELEASE**

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FOR RELEASE

March 29, 2017

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Auditor of State Mary Mosiman today released a report on a special investigation of the Benton Development Group (BDG) for the period January 1, 2009 through August 31, 2014. BDG is a non-profit organization which provides assistance to communities, individuals and businesses in Benton County with economic growth and vitality. A primary funding source of BDG is Benton County. The special investigation was performed as a result of concerns raised over certain financial transactions processed by Ranae Becker, the former Executive Director of BDG.

Mosiman reported the special investigation identified \$49,634.36 of improper and unsupported disbursements for the period January 1, 2009 through August 31, 2014. It was not possible to determine if any additional disbursements were improper because bank records prior to January 1, 2009 and sufficient supporting documentation were not available. In addition, Mosiman reported it was not possible to determine if all collections received by BDG were properly deposited during the period reviewed because adequate records were not available.

The improper disbursements identified include \$17,435.51 of improper purchases with BDG's credit card and \$12,825.01 of improper payroll disbursements to Ms. Becker, the former Executive Director, and related payroll costs. The improper purchases made with BDG's credit card include payments to wireless phone providers, Alliant Energy, retail vendors, and purchases made while on vacations in Virginia. The improper purchases with the credit card also include payments to convenience stores and television service providers. These purchases were identified as personal in nature and not related to the operations of the BDG.

Mosiman also reported sufficient documentation was not available for a number of disbursements from BDG's bank accounts. As a result, it was not possible to determine if certain disbursements were made for BDG operations or were personal in nature. The unsupported disbursements to vendors total \$7,320.67 and unsupported credit card purchases total \$3,624.31.

In addition, Mosiman reported the composition of BDG's Board of Directors changed in January 2014 and new procedures were implemented which provided more oversight of BDG's operations. Prior to January 2014 the Board failed to exercise proper fiduciary oversight.

The report includes recommendations to BDG's Board of Directors to ensure sufficient oversight continues and to strengthen the BDG's internal controls, such as improvements to segregation of duties, performing bank and credit card reconciliations, and ensuring all disbursements are properly supported, approved, and paid in a timely manner.

Copies of the report have been filed with the Benton County Attorney's Office, the Attorney General's Office, the Vinton Police Department, and the Division of Criminal Investigation. A copy of the report is available for review in the Office of Auditor of State and on the Auditor of State's web site at: <https://auditor.iowa.gov/reports/1610-0006-BE00>.

# # #

**REPORT ON SPECIAL INVESTIGATION  
OF THE  
BENTON DEVELOPMENT GROUP  
  
FOR THE PERIOD  
JANUARY 1, 2009 THROUGH AUGUST 31, 2014**

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Auditor of State's Report

To the Members of the Benton Development  
Group Board of Directors:

As a result of alleged improprieties regarding certain financial transactions, we conducted a special investigation of the Benton Development Group (BDG). We have applied certain tests and procedures to selected financial transactions of BDG for the period January 1, 2009 through August 31, 2014, unless otherwise identified. Based on our review of relevant information and discussions with BDG and County officials, we performed the following procedures:


- (1) Evaluated internal controls to determine whether adequate policies and procedures were in place and operating effectively.
- (2) Reviewed activity in BDG's bank accounts to identify any unusual activity.
- (3) Confirmed payments to BDG from Benton County to determine if they were properly deposited to the Group's bank accounts in a timely manner.
- (4) Scanned all disbursements from BDG's bank accounts for propriety. For selected disbursements, we examined available supporting documentation to determine whether they were appropriate, properly approved, and properly supported.
- (5) Examined BDG's credit card statements to determine if the purchases made with the credit card were appropriate, reasonable, and properly approved. Also, for certain purchases, we determined if purchases listed on the statements were supported by adequate documentation.
- (6) Compared available expense reports, credit card statements, and minutes of BDG's Board meeting to the images of the redeemed checks and other disbursements issued from BDG's bank accounts to identify any differences.
- (7) Examined payroll disbursements to the former Executive Director, Ranae Becker, to determine if payments were properly approved, properly supported, and the amount and frequency of the payments were reasonable.
- (8) Examined reimbursements to Ms. Becker to determine if the payments were properly approved and supported.
- (9) Interviewed BDG personnel and Board members to determine the propriety of certain disbursements and reimbursements.
- (10) Compared budgeted collection amounts to deposits to determine if the amounts deposited were reasonable for expectations.

These procedures identified \$49,634.36 of improper and unsupported disbursements. We were unable to determine if any additional disbursements were improper because bank records prior to January 1, 2009 and sufficient supporting documentation were not available. We were also unable to determine if all collections were properly deposited because adequate records were not available. Several internal control weaknesses were also identified. Our detailed findings and recommendations are presented in the Investigative Summary and **Exhibits A** through **E** of this report.

The procedures described above do not constitute an audit of financial statements conducted in accordance with U. S. generally accepted auditing standards. Had we performed additional procedures, or had we performed an audit of financial statements of the Benton Development Group, other matters might have come to our attention that would have been reported to you.

Copies of this report have been filed with the Benton County Attorney's Office, the Attorney General's Office, the Vinton Police Department, and the Division of Criminal Investigation.

We would like to acknowledge the assistance extended to us by officials of the Benton Development Group and the Vinton Police Department during the course of our investigation.

  
MARY MOSIMAN, CPA  
Auditor of State

February 17, 2017

## Report on Special Investigation of the Benton Development Group

### Investigative Summary

#### **Background Information**

The Benton Development Group (BDG) was created to increase the economic strength and growth of Benton County, its communities, and its businesses. BDG's Board of Directors is composed of representatives from the 15 communities in Benton County as well as 5 county-at-large members appointed by the County Board of Supervisors. The Board has 4 elected officers, including positions for the President, Vice President, Secretary, and Treasurer. Officers remained in position until they choose to step down at which time a replacement is voted on by the full Board. The officers are collectively referred to as the Executive Board. BDG also has a paid employee who serves as the Executive Director.

Since 2004, the Executive Director position has been held by 2 individuals. Ranae Becker began employment with BDG as an administrative assistant in April 1996 and was promoted to Executive Director in June 2004, a position she held until she was laid off in 2013 as a result of budget constraints. She then worked as an "as needed volunteer" until July 2013 when she was rehired as a part-time employee working approximately 10 hours per week. She left BDG's employment in June 2014 during the Board's search for a new full time Executive Director. After interviewing a number of candidates, the Board offered the position to Emily Upah who became the Executive Director in August 2014 and continues to hold that position.

As the Executive Director, Ms. Becker was responsible for assisting existing businesses with continued success, serving as a resource to new businesses considering locating in Benton County, and assisting city governments. She was responsible for working with community leaders, elected officials, State and Federal government advisors and officials, and other development-focused organizations to coordinate efforts to maximize resources and results. She was to serve as an advisor to the Executive Board on business and trends in economic development and she was to perform the following functions:

- Receipts – collecting, posting to the accounting records, and preparing and making bank deposits.
- Disbursements – making purchases for BDG operations; maintaining supporting documentation; preparing, signing and distributing checks; and posting disbursements to the accounting records.
- Bank accounts – receiving and reconciling monthly bank statements to accounting records, and reporting account balances.
- Reporting – preparing and maintaining BDG monthly financial reports, meeting minutes and financial reports, including monthly Director's reports, and coordinating with BDG's CPA firm to prepare certain financial records.

According to current Executive Board members, Ms. Becker processed all of BDG's financial transactions. Financial reports she presented to the Board were often summaries and presented verbally with limited written documentation to support the report.

BDG's office is located in a building owned by Benton County. BDG's primary revenue sources include funds provided quarterly by Benton County as approved by the Board of Supervisors, membership/sponsorship dues, and proceeds from fund raising events. BDG's primary expenses include the Executive Director's compensation, dues/membership to economic development organizations, office phone/internet service, and utility payments. Because BDG is located in a building owned by the County, utility payments are made to the County Auditor who pays for utility services for the entire building. Other expenses include providing refreshments at events hosted by BDG and printing advertising material for Benton County. Disbursements are primarily made by checks; however, a credit card was also available for the Executive Director's use.

During fiscal year 2013, BDG experienced budget difficulties which resulted in the Board laying off Ms. Becker at the April 24, 2013 Executive Board meeting. She began working for BDG again in July 2013 for approximately 10 hours per week on a part-time basis. In addition, the County Board of Supervisors reduced the support BDG received from the County effective for the fiscal year beginning July 1, 2013. During the fall of 2013, the Executive Board worked with the Board of Supervisors to restore funding for the following fiscal year. Another group approached the Board of Supervisors during this same time period with a new economic development strategy. In January 2014, the Board of Supervisors appointed several new members to BDG and most of these new appointees became the current Executive Board.

Upon being elected, the new Executive Board began to implement new procedures which provided for more oversight of BDG's operations in an effort to demonstrate accountability and create transparency of the organization with the Board of Supervisors and the public. The new procedures included written monthly Director's reports and detailed financial information which were to be submitted to the Board by Ms. Becker. According to Executive Board members we spoke with, information had not been provided by Ms. Becker in a timely or consistent manner.

Because the Board did not receive certain information requested from Ms. Becker to be used to prepare a budget for the fiscal year beginning July 1, 2014, several Executive Board members volunteered to gather financial records from the BDG office and help clean up and organize the office. During a day spent cleaning and organizing the office, 2 Executive Board members found several credit card statements and receipts in the trash. They reviewed the recovered information and identified what appeared to be several personal purchases made with BDG's credit card. The Executive Board members subsequently contacted the Benton County Attorney regarding their concerns.

The County Attorney referred them to the Vinton Police Department who opened an investigation into the situation on April 23, 2014. In May 2014, the Benton County Attorney's Office issued a subpoena for statements for BDG's credit card for the period January 1, 2009 to January 31, 2014. The County Attorney's Office also issued a subpoena for statements for BDG's checking and savings accounts for the period of January 1, 2009 through January 31, 2014.

After receiving a funding commitment from the County Board of Supervisors during the spring of 2014, the Board decided to reinstate the Executive Director as a full time position. However, because of the concerns regarding purchases Ms. Becker made with BDG's credit card, the Board also decided to open the position to any candidates applying. Ms. Becker applied for the position but was not selected. In June 2014, the Board hired Ms. Upah as the Executive Director starting in August 2014. Ms. Becker no longer held the part-time position of Executive Director effective June 30, 2014.

The Auditor of State's office was contacted in May 2016 and was requested to investigate the financial concerns previously identified. As a result, we performed the procedures detailed in the Auditor of State's report for the period January 1, 2009 through August 31, 2014.

### **Detailed Findings**

The procedures performed identified \$49,634.36 of improper and unsupported disbursements. The \$38,689.38 of improper disbursements identified include \$17,435.51 of credit card payments and \$12,825.01 of improper payroll disbursements and related payroll costs. The \$10,944.98 of unsupported disbursements identified include payments to vendors for which BDG could not locate supporting documentation. Because of the lack of supporting documentation, we were unable to determine if these payments were for BDG operations or personal in nature.

We were unable to determine if any additional disbursements were improper because bank records prior to January 1, 2009 and sufficient supporting documentation were not available. We were also unable to determine if certain collections were properly deposited because adequate records for receipts were not available. All findings are summarized in **Exhibit A** and a detailed explanation of each finding follows.



## **IMPROPER AND UNSUPPORTED DISBURSEMENTS**

With the assistance of the current Executive Director, Executive Board, and a representative of the Vinton Police Department, we obtained copies of bank statements, credit card statements, tax filings, images of redeemed checks, and deposit information for the period of January 1, 2009 through August 31, 2014. Bank records prior to January 1, 2009 were not readily available.

We reviewed all disbursements from BDG's bank accounts for the period January 1, 2009 through August 31, 2014. We also reviewed documentation available from BDG for certain disbursements to determine if they were appropriate. However, supporting documentation was not available for certain disbursements. As a result, we reviewed the payees and other notations on images of the redeemed checks. We also reviewed minutes of Board meetings which showed the Board did not review or approve specific financial transactions. We also obtained records from certain vendors and we discussed certain disbursements with Board members and the current Executive Director to determine the propriety of certain vendors or if the level or purchases from certain vendors appeared reasonable. In addition, an officer from the Vinton Police Department met with Ms. Becker on March 21, 2017. During that meeting, Ms. Becker stated she made certain personal purchases with BDG's credit card.

Based on our review, we identified several improper and unsupported disbursements. We classified payments as improper, unsupported or reasonable based on our review of available supporting documentation; the vendor, frequency, and amount of payments; certain notations in Board minutes; and discussions with BDG officials. Payments were classified as improper if they were personal in nature or not reasonable or necessary for BDG operations. Payments were classified as unsupported if the appropriate documentation was not available or if it was not possible to determine if the payment was related to BDG operations or was personal in nature. Payments were classified as reasonable if supporting documentation included a description of the goods or services, and/or the goods and services were reasonable and necessary for BDG operations.

Because we were unable to review images of redeemed checks for disbursements from BDG's checking account prior to January 1, 2009, we are unable to determine if additional improper or unsupported disbursements occurred prior to the period of our investigation. Because improper and unsupported disbursements were identified in January 2009, it is likely additional improper and unsupported disbursements occurred prior to January 1, 2009. As previously stated, Ms. Becker began employment with BDG as an administrative assistant in April 1996 and became the Executive Director in June 2004. There was not an independent review of the financial transactions she processed for BDG during the period she was the Executive Director.

The improper and unsupported disbursements identified were issued by Ms. Becker to herself and to certain vendors and are explained in more detail in the following paragraphs.

**Credit Card Purchases** – As previously stated, 2 Executive Board members found several credit card statements and receipts in the trash while cleaning and organizing the BDG office. According to the Executive Board members we spoke with, when new Board members requested financial information from Ms. Becker shortly after their appointment to the Board in January 2014, she often replied the information they requested was “in the files.” However, Ms. Becker did not provide the information requested. According to the Executive Board members, they had set up several times to meet Ms. Becker at the office to obtain the information from the files, but Ms. Becker did not arrive at the office. As a result and because Ms. Becker was working only a limited number of hours, they volunteered to obtain the financial information from BDG's files themselves because they needed the information to prepare a reorganization plan and budget.

According to the Executive Board members we spoke with, the credit card statements and receipts they found in the trash appeared to include personal purchases. To determine if purchases made with BDG's credit card and paid for with BDG funds were appropriate for BDG operations, we

obtained copies of credit card statements from Farmer's State Bank for the period December 3, 2008 through September 1, 2013. The last activity on the account was an adjustment made by the credit card company posted on August 15, 2013 which brought the account balance to zero. Credit card statements prior to January 2, 2009 were not available.

According to the Board members we spoke with, only Ms. Becker had access to BDG's credit card. She received the monthly statements, and she prepared the checks to pay the monthly bill. **Exhibit B** lists the purchases made with BDG's credit card from January 1, 2009 through September 1, 2013.

We reviewed each purchase made with BDG's credit card to determine if the purchases were reasonable for BDG's operations. To determine reasonableness of purchases for which supporting documentation was not available, we considered the vendor, the amount of the purchase, any notations included in the Board minutes around the time of the purchase, and discussions with Board members and the current Executive Director.

Purchases were considered improper if the type of goods or services provided by the vendor, the frequency of purchases from the vendor, or the amount of the purchases appeared to be personal in nature or was not reasonable for BDG operations. Charges which appeared consistent with BDG operations, based on the vendor and/or the amount of the charge, were classified as reasonable. Purchases from vendors which could be for BDG or for personal use were classified as unsupported. **Exhibit B** illustrates which charges were categorized as improper, reasonable, or unsupported.

As illustrated by **Exhibit B**, purchases were made from a number of vendors, including Amazon Marketplace, Alliant Energy, Benton/Linn Wireless, DirecTV, Dish Network, GOTOMYPC.com, OnStar®, Target, and Wal-Mart. With the exception of the receipts taken from the trash, supporting documentation was not available at the BDG for a number of the purchases made with the credit card.

As shown by the **Exhibit**, \$7,208.71 was determined to be reasonable for BDG operations. These charges include travel for Ms. Becker to conferences, payments to the Professional Developers of Iowa (PDI), the Iowa Economic Development, and Iowa Great Lakes Area. As illustrated by **Exhibit B**, we identified \$17,435.51 of improper and \$2,188.55 of unsupported credit card purchases during the period of our investigation. **Table 1** lists the categories for which improper and unsupported purchases were identified and the amount for each category.

**Table 1**

| Category                            | Number of Transactions | Improper Amount | Unsupported Amount |
|-------------------------------------|------------------------|-----------------|--------------------|
| Wireless service providers          | 13                     | \$ 4,394.37     | -                  |
| Retail stores                       | 32                     | 2,104.27        | 1,074.02           |
| Alliant Energy                      | 10                     | 2,601.88        | -                  |
| Convenience stores                  | 49                     | 1,808.28        | -                  |
| Vacations                           | 28                     | 1,736.12        | -                  |
| Television service providers        | 24                     | 1,606.19        | -                  |
| On-line retailers                   | 30                     | 1,009.12        | -                  |
| Qwest                               | 3                      | 768.21          | -                  |
| Restaurants                         | 19                     | 668.48          | 21.26              |
| OnStar®                             | 12                     | 457.38          | -                  |
| Lodging / food and beverage service | 6                      | -               | 998.06             |
| Grocery stores                      | 4                      | 179.21          | 95.21              |
| Miscellaneous                       | 3                      | 102.00          | -                  |
| Total                               | 233                    | 17,435.51       | 2,188.55           |

As illustrated by the **Table**, we identified \$17,435.51 of purchases with BDG's credit card which were not for BDG operations. Examples of items purchased which are considered improper and supported are described in the following paragraphs.

- Wireless service providers – Ms. Becker received a \$60.00 reimbursement each month for cell phone service. However, we also identified 13 payments to 2 wireless phone service providers with BDG's credit card between January 21, 2009 and February 27, 2013. Based on an internet search, the 2 providers, Benton/Linn Wireless LLC and I Wireless in Vinton, had the same street address. As a result, it appears all 13 payments were made to the same vendor.

The 13 payments total \$4,394.37. The payments to the wireless service providers ranged from \$76.65 to \$698.13. None of the payments were made on a routine basis or were for consistent amounts. Some of the payments were made in even increments, such as \$100.00, \$300.00, and \$400.00. Because payments were made frequently but not each month, it appears payments for wireless service were also made from another source.

Because Ms. Becker received a monthly reimbursement for her cell phone service and BDG did not have a cell phone, the 13 payments to the cell phone service providers were classified as improper.

- Retail vendors – The credit card statements include 31 purchases from retail vendors made between February 25, 2009 and February 13, 2013 which total \$3,185.21. The credit card statements also include a \$6.92 refund applied to the credit card at Wal-Mart on January 1, 2013. According to Board members we spoke with, some of the purchases from retail vendors, such as Wal-Mart, may have been appropriate because Ms. Becker would have been responsible for periodically purchasing supplies for events sponsored by BDG. These purchases should have been made in the local area, including Cedar Rapids.

We were unable to locate receipts for the purchases identified. However, some of the purchases were from retail vendors which do not sell items typically used for BDG operations, such as Best Buy, GameStop, Menards, Theissen's, and T.J.Maxx. We also determined some of the purchases were on dates and in locations which had no relation to BDG operations. As a result, these purchases were determined to be personal in nature. Of the purchases from retail vendors, we determined 18, totaling \$2,111.19, were improper; however, after allowing for the \$6.92 refund, the improper included in **Table 1** and **Exhibit B** totals \$2,104.27.

We identified 13 purchases totaling \$1,074.02 from retail vendors in the Vinton, and Cedar Rapids areas or online which may be related to BDG operations or may be personal in nature. Because we are unable to determine the propriety of these purchases, they are classified as unsupported.

- Alliant Energy – According to Board members we spoke with, utility payments for the BDG office are made to the Benton County Auditor who then pays Alliant Energy for utility services. We verified Ms. Becker issued checks from BDG's checking account to the County Auditor for utility services. We also confirmed with the County Auditor each of the payments received for BDG's utility services were made with checks.

While BDG did not pay Alliant Energy directly for utility services, we identified 6 payments to Alliant Energy made with BDG's credit card. The payments were made between June 17, 2009 and February 14, 2013 and ranged from \$225.00 to \$604.50. In addition, fees were incurred on BDG's credit card for making electronical payments to Alliant for 4 of the 6 payments.

The 10 charges total \$2,601.88. Because BDG does not pay Alliant Energy directly for utility services, the 10 charges were determined to be improper because they were personal in nature.

- Convenience stores – Ms. Becker was reimbursed between \$0.51 and \$0.565 per mile for driving her personal vehicle to destinations for BDG purposes. Because Ms. Becker received reimbursements for mileage, fuel should not have been purchased with BDG's credit card. However, we identified 49 convenience store purchases totaling \$1,808.28 made between March 29, 2009 and March 13, 2013. These charges appear to be fuel purchases based on the dollar amounts, vicinity to Vinton and vicinity to known events attended by Ms. Becker. The location of several convenience store purchases can be traced to the expense reports filed by Ms. Becker during fiscal years 2012 and 2013 for which she claimed mileage. A copy of a receipt from a convenience store found in the trash by Board members is included in **Appendix 1**.

During the March 21, 2017 meeting with an officer from the Vinton Police Department, Ms. Becker stated she did not claim mileage for the times when she used BDG's credit card to purchase fuel. However, we identified fuel purchases made with the credit card during times she reported mileage on available reimbursement reports.

Because Ms. Becker received mileage reimbursements, the \$1,808.28 of convenience store purchases were classified as improper.

- Vacations – We identified 28 purchases, totaling \$1,736.12, made in, near, or on the way to Virginia Beach, VA during the summer months in 2009, 2011, and 2012. According to Executive Board members, Ms. Becker is originally from Virginia and has family in that area. She made summer trips to that area to visit family.

Some of the receipts found in the trash by Executive Board members included receipts from the June 2012 trip to Virginia Beach. Copies of selected receipts are included in **Appendix 2**. As illustrated by the **Appendix**, the purchases include fuel, groceries, clothing, beer, sunscreen, and golf balls.

As illustrated by **Exhibit B**, a \$59.00 purchase was also made at the Milwaukee County Zoo in August 2009. Because these costs were not related to BDG operations, they are personal in nature and classified as improper.

- Television service providers – BDG does not have a television in the office. However, we identified 24 payments to television service providers totaling \$1,606.19. Payments to Dish Network, DirecTv and Satellite Services made with BDG's credit card were determined to be personal in nature.

As illustrated by **Exhibit B**, 5 payments to Dish Network with the credit card totaling \$821.54 were made between August 30, 2010 and June 5, 2012. The inconsistency of the payments made with BDG's credit card indicates payments were also being made from another source.

There are also 10 charges for \$4.99 each month from July 2, 2012 through April 2, 2013 from Satellite Services LLC. During this period, there were also frequent payments to DirecTv totaling \$734.75 between June 22, 2012 and March 22, 2013.

During the March 21, 2017 meeting with an officer from the Vinton Police Department, Ms. Becker stated a credit card was required to obtain services from these vendors and she only had access to BDG's credit card.

- On-line retailers – We identified 30 purchases totaling \$1,009.12 from on-line retailers such as GOTOMYPC.COM, Amazon Marketplace, Teamfanshop.com, and Target.com.

These purchases also include ones which have “PayPal” and “402-935-7733” in the description on credit card statements. According to information from PayPal’s website, this information appears when a purchase is made via PayPal, but sufficient funds are not available in the PayPal account to cover the charge. When a PayPal account is established, the user is required to provide a bank account or credit card as a backup billing method. The “PayPal 402-935-7733” coding shows PayPal is using the backup billing method to cover a shortfall in a PayPal account. Because BDG does not have a PayPal account and has no reason for a PayPal account, these are improper purchases.

During the March 21, 2017 meeting with an officer from the Vinton Police Department, Ms. Becker stated the BDG credit card was used for some personal purchases made online because the credit card number auto-filled when orders were placed.

Because purchases for BDG operations are made at local vendors for items such as office supplies, it is unlikely that these charges are related to BDG operations. As a result, the purchases are determined to be improper.

- Qwest – There were 3 payments to Qwest Comm with BDG’s credit card in 2009 totaling \$768.21. The payments were made between January 19, 2009 and May 31, 2009. We identified monthly payments to Qwest from BDG’s checking account for phone services provided at the BDG office. The 3 payments made with BDG’s credit card were in addition to the monthly payments issued from BDG’s checking account. As a result, the payments to Qwest Comm with BDG’s credit card are personal in nature and are improper.
- Restaurants – The credit card statements included 32 purchases made at restaurants. We compared the purchases to Ms. Becker’s reimbursement reports available for fiscal years 2012 and 2013. When we were able to determine Ms. Becker was traveling for BDG in the vicinity of a restaurant charge, we determined the purchase was reasonable. Reimbursement reports were not available for fiscal years 2009 through 2011. As a result, we were unable to determine if purchases at restaurants outside the local area were reasonable during this period. These purchases were classified as unsupported.

We determined 18 purchases, totaling \$668.48, were improper because they were made at local restaurants in Vinton and surrounding counties and/or were for amounts which exceed what is reasonable for 1 person. We did not identify any notations in the Board minutes where Ms. Becker reported to the Board she held a meeting at these locations or with other parties. The improper purchases also include a \$1.50 charge at a local coffee shop.

We also identified a \$21.26 purchase at a restaurant in Altoona which may have been during travel for BDG operations. Because supporting documentation was not available to determine if the purchase was for BDG operations or personal in nature, it was classified as unsupported.

- OnStar® – We identified 12 payments, totaling \$457.38, to OnStar® navigation systems made with BDG’s credit card. Because BDG does not own any vehicles, it is not reasonable for them to have an OnStar® subscription. As a result, the payments to OnStar® were determined to be improper because they were personal in nature.

- Lodging and/or food and beverage service – We identified 24 charges incurred at hotels which we compared to notations of Ms. Becker’s travel in Board meeting minutes and available travel claims. These charges total \$5,013.21 and are classified as reasonable.

We also identified 6 charges totaling \$998.06 incurred at hotels or with online vendors providing hotel reservations which we were unable to trace to a specific event identified in the Board meeting minutes or available travel claims. In addition, supporting documentation was not available from BDG. Because we are unable to determine if the charges were for BDG operations or personal in nature, they were determined to be unsupported.

- Grocery Stores – We identified 4 charges totaling \$274.42 to Fareway Stores in Vinton. Specifically, a purchase was made on December 1, 2012 and a purchase was made on December 18, 2012. However, the minutes of the December 5, 2012 Board meeting do not include any notations of events for which food would have been purchased on the previous Saturday (December 1, 2012) or an upcoming event to explain the purchase on December 18, 2012.

The Fareway purchases also include \$23.96 spent on Friday, October 22, 2010. The minutes of the September 29, 2010 Board meeting document Ms. Becker reported she would be attending the Iowa Tourism Conference in Burlington on October 21, and October 22. The minutes did not include any mention of other upcoming events for which BDG would have a need to purchase food. As a result, the 3 purchases totaling \$179.21 were classified as improper.

The remaining purchase for \$95.21 was made on May 20, 2010. Board minutes were not available for May 2010. According to the current Executive Director, an agenda was prepared for the May meeting, but it appears it was not held for lack of a quorum. Because we were unable to determine if the purchase was related to an event sponsored by BDG or personal in nature, it was classified as unsupported. We also determined several checks were issued to Fareway from BDG’s checking account. The memo portion of the checks indicated the costs were for meeting expenses.

- Miscellaneous – We identified 3 charges totaling \$102.00 which are not related to BDG operations. They include a \$38.00 purchase from Iowa Volleyball Region, \$49.00 from the University of Iowa Ticket Office, and \$15.00 from the University of Northern Iowa Alumni Association.

In addition to improper purchases using the BDG’s credit card, the group incurred finance charges and late fees totaling \$1,136.41. Because Ms. Becker was responsible for ensuring timely payment of all payments for BDG, including credit card bills, the finance charges and late fees are improper disbursements.

The transactions listed on the credit card statements were also reviewed by the BDG Treasurer who identified a number of improper purchases. We reviewed the purchases he identified as improper and determined they included payments to wireless service providers, television service providers, Alliant Energy, and OnStar®. The improper purchases he identified also included purchases at convenience stores, retail vendors, and restaurants. In addition, he included a purchase at Country Inn & Suites in Council Bluffs on September 29, 2012 as improper. However, we determined the transaction was reasonable for BDG operations based on a reimbursement report submitted by Ms. Becker which showed she attended a conference in Council Bluffs during that time.

The \$17,435.51 of improper and \$2,188.55 of unsupported credit card purchases listed in **Exhibit B** are included in **Exhibit A**.

**Table 2** summarizes the activity obtained from the credit card statements.

| <b>Table 2</b>              |               |
|-----------------------------|---------------|
| <b>Description</b>          | <b>Amount</b> |
| Beginning balance, 12/03/08 | \$ 1,435.79   |
| Add: Purchases*             | 26,832.77     |
| Other debits                | 15.83         |
| Fees and interest           | 1,136.41      |
| Less: Payments              | (29,420.80)   |
| Ending balance, 09/01/13    | \$ -          |

\* - Net of \$6.92 refund.

As illustrated by **Table 2**, BDG incurred \$1,136.41 of late fees, finance charges, and interest. As the Executive Director, it was Ms. Becker's responsibility to ensure the credit card bill was paid in a timely manner so these costs would not be incurred. The \$1,136.41 is included in **Exhibit A** as improper disbursements.

**Table 2** also shows the payments listed on the credit card statements total \$29,420.80. Using the monthly statements for BDG's bank accounts, including images of redeemed checks, we identified 32 payments from BDG's checking account for the credit card. The 32 payments from BDG's checking account for the credit card total \$28,565.80 and are listed in **Exhibit C**. The \$855.00 of remaining payments were from another source.

The 32 payments from BDG's bank accounts were made between January 6, 2009 and August 13, 2013 and range from \$9.95 to \$1,882.52. As illustrated by **Table 2**, the \$29,420.80 of payments offset the \$26,832.77 of purchases, the \$15.83 "other debit," and the \$1,435.79 beginning balance. Because credit card statements are not available for the period prior to January 1, 2009, we are unable to determine the propriety of the purchases included in that amount. As a result, the \$1,435.79 beginning balance is included in **Exhibit A** as unsupported disbursements.

Because BDG did not pay for the payments totaling \$855.00, this amount is also included in **Exhibit A** as a reduction of the total improper and unsupported payments. The 2 payments could not be identified to specific purchases.

As illustrated by **Exhibit C**, the memo portion of a number of the checks issued to pay BDG's credit card are described as "travel" or "meeting expenses." However, by comparing the payments to purchases made with the credit card, we determined most of those descriptions are not accurate. For instance, the memo portion of check number 5554 for \$1,054.48 and dated April 24, 2009 states "travel (RTF)." However, the payment included only \$391.06 of hotel and restaurant purchases. The remaining charges paid with the check include purchases from Wal-Mart, Theissen's, the University of Iowa athletic tickets, and convenience stores. It also included payments to a wireless phone service provider and Qwest. Each of the purchases listed in **Exhibit B** between February 3, 2009 and March 29, 2009 are included in the \$1,054.48 payment, which also included a \$25.00 late fee and a \$6.35 finance charge.

The memo portion of check number 6009 dated September 24, 2012 also states "travel." However, the amount paid consists of 2 charges from Satellite Services, 3 charges from OnStar, and a charge from DirecTV Service. The 6 charges are listed in **Exhibit B** from August 2, 2012 through September 2, 2012.

**Exhibit C** also illustrates a number of checks issued from BDG's checking account for the credit card include the notation "reimbursement to follow" or "RTF" in the memo portion. It is unclear if the reimbursements described in the memo portions of the checks were to be made to BDG by Ms. Becker or another party. However, when we reviewed deposits to BDG's bank accounts, we

did not identify any deposits which appear similar in amount or timing as these payments. It is also unclear if these notations were made in the event someone reviewed the disbursements and had questions about them.

**Checks Issued to Ranae Becker** – As previously stated, Ms. Becker began employment with the Benton Development Group in April 1996. We identified 249 checks Ms. Becker issued to herself from BDG's bank accounts during the period of our investigation. The 249 checks total \$195,395.35 and include payroll, amounts for insurance, and monthly reimbursements. The payments are discussed in detail in the following paragraphs.

We were unable to locate a payroll journal or other records which summarized payroll information. However, each payroll check Ms. Becker issued to herself include the gross amount and withholding amounts in the memo portion of the check.

As the Executive Director, Ms. Becker was paid twice a month. Ms. Becker was also eligible for reimbursement of expenses related to BDG operations which included purchases she made on behalf of BDG and mileage. She also received a monthly reimbursement for her cell phone and for what she described as "internet/data" on the reimbursement reports available for our review. As stated earlier, most reimbursement reports were available for fiscal years 2012 and 2013, but reimbursement reports were not available for fiscal years 2009 through 2011.

Of the 249 checks we identified to Ms. Becker, 127 checks totaling \$132,384.15 were for payroll, 59 checks totaling \$34,283.44 were for insurance, and 62 checks totaling \$28,420.26 were for reimbursement of phone, internet, and travel related expenses. The remaining check Ms. Becker issued to herself was a \$307.50 reimbursement for a wage garnishment. These disbursements are described in the following paragraphs.

**Payroll** – Because summarized payroll records were not available, we used the following information to analyze Ms. Becker's payroll information for the period January 1, 2009 through August 31, 2014.

- Images of redeemed checks Ms. Becker issued to herself from the BDG's bank accounts. As previously stated, the memo portion of each payroll check included the gross payroll and withholding amounts.
- Copies of Board minutes which included approved increases to the Executive Director's salary.
- Copies of IRS Form 990EZ, Return of Organization Exempt From Income Tax.
- Discussions with current Executive Board Members regarding the Executive Director's compensation and the frequency of payments.
- Annual budgets submitted by BDG to the Benton County Board of Supervisors.

Board members we spoke with were unable to specify the frequency of Ms. Becker's authorized payroll checks. However, from January 1, 2009 through April 30, 2012, Ms. Becker consistently paid herself twice each month. During this period, she periodically received her payroll check early, but the frequency was consistently 2 checks per month. In addition, there was no mention in Board minutes of modifying the frequency of Ms. Becker's payroll checks. As a result, when comparing the number of authorized payroll checks to the number of payroll checks Ms. Becker actually issued to herself, we determined it was appropriate for Ms. Becker to receive 2 payroll checks each month.

**Exhibit D** lists the 127 payroll checks Ms. Becker issued to herself. The **Exhibit** also identifies 51 of these checks were issued to Ms. Becker prior to the end of the pay periods from January 1, 2009 through April 30, 2013. Because Ms. Becker was laid off in 2013 as a result of budget constraints, the frequency of her payroll checks changed after April 10, 2013. She worked as an



“as needed volunteer” from the end of April until July 2013 when she was rehired as a part-time employee working approximately 10 hours per week.

According to minutes from the Board’s March 2013 meeting, the Board discussed reducing Ms. Becker’s hours after she reported “current funds would not get the organization to the end of June.” However, the Board ultimately decided to allow the 4 members of the Executive Board to decide how to proceed. The minutes from the Executive Board’s meeting in April 2013 show the Executive Board decided to lay-off Ms. Becker to allow her to draw unemployment.

As illustrated by **Exhibit D**, the last payroll check Ms. Becker issued to herself for \$1,201.00 (her salary amount as a full-time employee) was check number 6078 dated April 10, 2013. Because Ms. Becker should not have issued herself a payroll check prior to the end of a pay period, check number 6078 should have been for the pay period ended March 31, 2013. In addition, there were no checks issued to Ms. Becker for April 2013. As a result, we determined March 31, 2013 was the appropriate ending date for Ms. Becker’s authorized full-time salary.

We compared the number of checks Ms. Becker issued to herself to the authorized number of checks for the period January 1, 2009 through March 31, 2013. As illustrated by **Exhibit D**, Ms. Becker received more than 2 checks within a month on a several occasions. For example, in May 2012 she received 3 payroll checks even though she received 2 in April and 2 in June. In addition, she received 4 payroll checks in August 2012, 3 payroll checks in October 2012, and 3 payroll checks in December 2012 even though she received 2 payroll checks in each of the prior and succeeding months.

Also as illustrated by **Exhibit D**, Ms. Becker did not prepare a payroll check for herself for the pay period ended January 31, 2009. Because timesheets were not prepared or available, we are unable to determine if Ms. Becker took some time off and, as a result, did not receive a payroll check. We did not identify any indication Ms. Becker received paid leave from BDG. Board members we spoke with were unable to specify if Ms. Becker received paid leave. Because we were unable to determine why she didn’t prepare a check for herself and she may have taken time off without pay, we have not included this amount in **Exhibit A**.

We also reviewed minutes from the Board meetings to determine if the gross amounts of her payroll were properly calculated. Board minutes identified salary increases in 2009, 2011 and 2012; however, effective dates of the increases were not consistently specified. Specifically:

- A 2.5% pay increase was approved on April 29, 2009 and was implemented effective July 1, 2009, at the beginning of the next fiscal year. As illustrated by **Exhibit D**, Ms. Becker increased her gross pay for the pay period ended June 30, 2009 which resulted in a \$34.07 overpayment of gross pay to Ms. Becker.
- On March 30, 2011, the Executive Board approved a 2.0% increase for Ms. Becker; however, minutes of the Board meeting did not specify when the increase was to become effective. Because BDG’s budget was established on a fiscal year basis and the Board specified Ms. Becker’s previous increase was to be effective July 1, 2009, it is reasonable to expect her next increase was also to be effective on July 1 with the start of the new fiscal year.

However, instead of waiting until July 1, 2011 to increase her salary, Ms. Becker increased her pay by 2.61% effective with the next payroll check she prepared for herself, which was check number 5814 dated April 8, 2011. As illustrated by **Exhibit D**, she also began having a garnishment withheld from her pay during the same pay period. We are unable to determine if Ms. Becker implemented the pay prior to July 1 to help offset the effect of the garnishment.

In addition to being implemented prior to July 1, 2011, the increase Ms. Becker calculated was too large. A 2.0% increase to Ms. Becker's gross pay should have resulted in gross wages of \$1,424.82 per pay period effective July 1, 2011. However, Ms. Becker increased her gross pay to \$1,433.33 per pay period. This resulted in a \$36.45 overpayment to Ms. Becker for her gross pay for each pay period until the end of fiscal year 2011 and an \$8.51 overpayment of gross pay to Ms. Becker for each pay period in fiscal year 2012.

- According to the minutes from the Board's March 28, 2012 meeting, Ms. Becker was awarded a 2.0% pay increase. However, Ms. Becker did not increase the gross wages she recorded in the memo portion of her payroll checks. As a result, the gross amount was \$19.99 less per check than expected for fiscal year 2013.

We also compared the number of checks Ms. Becker issued to herself to the authorized number of checks she should have received for the period July 1, 2013 through June 30, 2014. As stated previously, Ms. Becker returned to BDG as a part-time employee effective July 1, 2013.

As illustrated by **Exhibit D**, the memo portion of check number 6092 Ms. Becker issued to herself on July 9, 2013 states the payroll check was for her July salary and included \$180.00 gross pay. In addition, the memo portion of check number 6094 Ms. Becker issued to herself on July 26, 2013 states "Mo[nthly] salary" and also included \$180.00 gross pay. **Exhibit D** also illustrates Ms. Becker received 2 additional checks with gross pay of \$180.00 each during August and September. However, the next payroll check Ms. Becker issued to herself was in October and included a notation in the memo portion that the gross salary was \$360.00. The payroll checks Ms. Becker issued to herself for the rest of the fiscal year included gross wages of \$360.00 or \$300.00. As a result, we did not rely only the memo portion of the checks to determine Ms. Becker's authorized gross wages for fiscal year 2014.

BDG's fiscal year 2014 budget included an hourly pay rate of \$18.00 for the Executive Director. In addition, Ms. Becker reported at the January 15, 2014 Board meeting she was working 2 to 2.5 hours per week and she was paid on a monthly basis. Based on this information and the memo portions of the payroll checks Ms. Becker issued to herself when she returned to BDG in July 2013, we determined \$180.00 was a reasonable authorized salary amount.

**Table 3** summarizes the incorrect gross pay Ms. Becker issued to herself by fiscal year.

| <b>Table 3</b>    |                         |                  |                         |                  |                         |
|-------------------|-------------------------|------------------|-------------------------|------------------|-------------------------|
| <b>Period</b>     | <b>Issued</b>           |                  | <b>Authorized</b>       |                  | <b>Excess Gross Pay</b> |
|                   | <b>Number of Checks</b> | <b>Gross Pay</b> | <b>Number of Checks</b> | <b>Gross Pay</b> |                         |
| 01/01/09-06/30/09 | 12                      | \$ 16,387.79     | 12                      | \$16,353.72      | 34.07                   |
| 07/01/09-06/30/10 | 24                      | 33,525.12        | 24                      | 33,525.12        | -                       |
| 07/01/10-06/30/11 | 24                      | 33,780.27        | 24                      | 33,525.12        | 255.15                  |
| 07/01/11-06/30/12 | 25                      | 35,833.25        | 24                      | 34,195.68        | 1,637.57                |
| 07/01/12-03/31/13 | 23                      | 32,966.59        | 18                      | 26,159.76        | 6,806.83                |
| Subtotal          | 108                     | 152,493.02       | 102                     | 143,759.40       | 8,733.62                |
| 07/01/13-06/30/14 | 19                      | 5,340.00         | 12                      | 2,160.00         | 3,180.00                |
| Total             | 127                     | \$ 157,833.02    | 114                     | 145,919.40       | 11,913.62               |

The \$11,913.62 of excess gross pay illustrated by **Table 3** includes the unauthorized payroll checks Ms. Becker issued to herself and the excess payroll which resulted from incorrect payroll increases. **Table 4** breaks down the excess gross payroll amounts by fiscal year.

**Table 4**

| <b>FY</b> | <b>Unauthorized Checks</b> | <b>Incorrect Increases</b> | <b>Total Excess Gross Pay</b> |
|-----------|----------------------------|----------------------------|-------------------------------|
| 2009      | \$ -                       | 34.07                      | 34.07                         |
| 2010      | -                          | -                          | -                             |
| 2011      | -                          | 255.15                     | 255.15                        |
| 2012      | 1,433.33                   | 204.24                     | 1,637.57                      |
| 2013      | 7,166.65                   | (359.82)                   | 6,806.83                      |
|           | 8,599.98                   | 133.64                     | 8,733.62                      |
| 2014      | 3,180.00                   | -                          | 3,180.00                      |
| Total     | \$ 11,779.98               | 133.64                     | 11,913.62                     |

The \$11,779.98 excess gross pay which resulted from unauthorized checks and the \$133.64 of excess gross pay which resulted from incorrect payroll increases are included in **Exhibit A** as improper disbursements.

Because Ms. Becker was paid \$11,913.62 of gross pay in excess of her authorized amount, BDG also incurred \$911.39 of excess costs for the employer's share of FICA. This amount is also included in **Exhibit A** as improper disbursements.

Insurance - As previously stated, Ms. Becker was compensated for providing her own insurance coverage. She issued a separate check to herself each month with the memo notation "ED [Executive Director] insurance" or "insurance". There were no references to insurance rates or amounts found in the BDG meeting minutes; however, the annual amount paid was included in BDG's annual budget. We determined Ms. Becker received the following monthly amounts for insurance.

**Table 5**

| <b>Period</b>            | <b>Monthly Amount</b> |
|--------------------------|-----------------------|
| January 2009 – May 2009  | \$ 568.75             |
| June 2009 – March 2012   | 582.92                |
| April 2012 – May 2013    | 664.00                |
| July 2013 – January 2014 | 332.00                |

As illustrated by **Table 5**, Ms. Becker did not receive any checks described as insurance compensation after January 2014. We did not identify any unauthorized checks described as insurance. As a result, nothing is included in **Exhibit A** for the insurance compensation provided to Ms. Becker.

Reimbursements – The Executive Director was reimbursed each month for expenses incurred on behalf of BDG, including mileage to events throughout the county, state and other locations for conferences or to meet with businesses, community groups/leaders, development events/groups and state agency representatives. In addition to the mileage reimbursements, Ms. Becker received reimbursements each month for the use of her personal cell phone and for her home internet connection. We identified 62 checks Ms. Becker issued to herself for reimbursements totaling \$28,420.26. We verified she did not receive more than 1 reimbursement check for each month.

Reimbursement reports were available for 22 of the 24 reimbursement checks Ms. Becker issued to herself during fiscal years 2012 and 2013; however, reimbursement reports were not available for periods prior to July 1, 2011 or after May 30, 2013. The expense report Ms. Becker submitted

for May 2013 shows she traveled on May 7 and May 22 even though she was laid off at the April 2013 Executive Board meeting.

To determine if the frequency of trips and destinations shown in the reimbursement reports available were reasonable, we compared the dates and destinations from the reimbursement reports to Board minutes. In some cases, we were able to confirm the dates and destinations were reasonable, but other destinations were not specifically mentioned in the Board minutes. As a result, we are unable to determine if Ms. Becker actually incurred the mileage she reported for certain destinations on the 22 reimbursement reports available for our review. Reimbursement reports are not available for the remaining 40 reimbursement checks Ms. Becker issued to herself prior to July 1, 2011 and after May 12, 2013.

The responsibilities of the Executive Director involve traveling to certain events in the Benton County area and attending conferences and training events. The current Executive Director has received \$50.00 per month reimbursement for her cell phone and monthly reimbursements for mileage and BDG materials she has purchased. Her monthly reimbursement amounts have ranged from approximately \$250.00 - \$700.00 per month. The monthly reimbursements to Ms. Becker were not significantly different from the amount reimbursed to the current Executive Director. However, **Table 6** lists the dates of the checks Ms. Becker issued to herself for the reimbursement reports she submitted for fiscal years 2011 and 2012. As illustrated by the **Table**, for each of the 22 reimbursement reports available, the checks for that month was issued prior to the end of the month. The check was also issued prior to some of the travel dates reported on 21 of the 22 reimbursements reports available. As a result, it is clear Ms. Becker was routinely reimbursed mileage for trips prior to the trips occurring.

**Table 6** also illustrates Ms. Becker issued herself a reimbursement check on October 6, 2011, but all of the travel dates she reported on that month's reimbursement report were after October 6, 2011. In addition, the check she issued herself on February 9, 2013 was before all of the travel dates she reported on that month's reimbursement report.

| <b>Table 6</b> |                         |                              |                         |                              |
|----------------|-------------------------|------------------------------|-------------------------|------------------------------|
| <b>Month</b>   | <b>Fiscal Year 2011</b> |                              | <b>Fiscal Year 2012</b> |                              |
|                | <b>Check Date</b>       | <b>Travel Dates Reported</b> | <b>Check Date</b>       | <b>Travel Dates Reported</b> |
| July           | 07/07/11                | 07/07/11 – 07/27/11          | 07/23/12                | 07/10/12 – 07/20/12          |
| August         | 08/17/11                | 08/05/11 – 08/31/11          | 08/13/12                | 08/01/12 – 08/29/12          |
| September      | 09/12/11                | 09/06/11 – 09/30/11          | 09/12/12                | 09/11/12 – 09/28/12          |
| October        | 10/06/11                | 10/11/11 – 10/25/11          | 10/15/12                | 10/02/12 – 10/17/12          |
| November       | 11/10/11                | 11/01/11 – 11/14/11          | 11/20/12                | 11/01/12 – 11/21/12          |
| December       | 12/19/11                | 12/07/11 – 12/27/11          | 12/11/12                | 12/08/12 – 12/19/12          |
| January        | 01/16/12                | Not available                | 01/15/13                | 01/14/13 – 01/30/13          |
| February       | 02/09/12                | 02/01/12 – 02/29/12          | 02/09/13                | 02/13/13 – 02/27/13          |
| March          | 03/09/12                | 03/01/12 – 03/28/12          | 03/15/13                | 03/01/13 – 03/27/13          |
| April          | 04/10/12                | 04/04/12 – 04/20/12          | 04/10/13                | 04/02/13 – 04/19/13          |
| May            | 05/08/12                | 05/02/12 – 05/30/12          | 05/12/13                | 05/07/13 – 05/22/13          |
| June           | 06/26/12                | Dates not specified          | 06/15/13                | Not available                |

As previously stated, we identified travel dates included in the reimbursement reports which were after the issuance date of Ms. Becker's reimbursement check for that month. We identified 75 of these travel dates. We also identified 28 destinations listed on Ms. Becker's reimbursement

reports for which a date of travel was not provided. As a result, we are unable to determine if the reimbursement payment was made in advance of the mileage Ms. Becker reported for these trips.

Because Ms. Becker was paid in advance for the trips identified, there is no assurance Ms. Becker actually incurred mileage to the destinations she reported. However, by reviewing minutes of Board meetings and credit card activity, we were able to confirm Ms. Becker did travel to 11 destinations for which she received an advance payment. The amount reimbursed to Ms. Becker for the remaining 92 destinations totaled \$4,208.38. Because Ms. Becker should not have paid herself in advance for the mileage she anticipated to incur or reportedly incurred and because there was no supporting documentation of the trips, the \$4,208.38 is included in **Exhibit A** as improper disbursements.

In addition to reimbursement for mileage, Ms. Becker received \$60.00 per month for using her cell phone and \$55.00 per month for her internet costs during fiscal years 2012 and 2013. Because reimbursement reports are not available for earlier periods, we are unable to determine the amount Ms. Becker was previously reimbursed for her cell phone and internet service. Ms. Becker also received 8 reimbursements for \$115.00 between June 15, 2013 and January 15, 2014.

As previously stated, the current Executive Director does not receive a reimbursement for internet services. BDG paid for internet services at the BDG office until Ms. Becker was laid-off in 2013. In addition to the internet costs for the office, Ms. Becker received reimbursement for internet services at home. Because it is common to have internet service at home, it is unusual for an employee to receive reimbursement for it. Documentation was not available to show the Board approved reimbursing Ms. Becker for internet services at home. In addition, there is no apparent public benefit to BDG reimbursing Ms. Becker for internet services at her home. As a result, we have included the \$1,815.00 BDG reimbursed Ms. Becker from June 10, 2011 through January 17, 2014 for internet services in **Exhibit A** as improper disbursements. While reimbursement reports were not available prior to fiscal year 2011, Ms. Becker documented in the memo portion of reimbursement checks to herself the \$55.00 monthly reimbursement for internet services began with check number 5841 issued on June 10, 2011 and continued through reimbursement checks issued in January 2014.

**Checks to vendors** – As previously stated, supporting documentation frequently was not available to determine the propriety of certain disbursements. To determine reasonableness of the disbursements without supporting documentation, we considered the vendor, the amount of the purchase, any notations included in the Board minutes around the time of the purchase, and discussions with Board members and the current Executive Director. Purchases were considered improper if the type of goods or services provided by the vendor, the frequency of purchases from the vendor, or the amount of the purchases appeared to be personal in nature or was not reasonable for BDG operations.

The disbursements which we determined were improper and those for which we were unable to determine propriety are listed in **Exhibit E**. As illustrated by the **Exhibit**, we identified \$134.22 of improper and \$7,320.67 of unsupported disbursements during the period of our investigation. The improper and unsupported disbursements are described in the following paragraphs.

- On July 9, 2009, Ms. Becker issued check number 5578 to Tharp Design for \$50.00. By reviewing the image of the check, we determined the notation in the memo portion stated “misc maintenance.” The check was not manually prepared; however, there was a portion of handwritten notation also in the memo line which was unreadable.

Tharp Design is a local business which provides screen printing services. There are no “maintenance” services this vendor would provide BDG. As a result, the disbursement was determined to be improper.

- On July 19, 2010, Ms. Becker issued check number 5714 to I Wireless for \$5.82. By reviewing the image of the check, we determined the notation in the memo portion stated “advertising (photo contest).” The memo does not appear to be related to the vendor.

As previously stated, we determined Ms. Becker used BDG’s credit card for wireless provider payments and BDG did not have a cell phone. As a result, the payment was determined to be improper.

- On October 22, 2009, Ms. Becker issued check number 5622 to Alliant for \$60.00. By reviewing the image of the check, we determined the notation in the memo portion stated “mtg expense.” However, the memo does not appear to be related to the vendor.

As previously stated, utility payments for the BDG office are made to the Benton County Auditor who then pays Alliant Energy for utility services. We verified Ms. Becker issued checks from BDG’s checking account to the County Auditor for utility services. We also confirmed with the County Auditor each of the payments received from BDG for utility services were made with checks payable to the County. Because BDG does not pay Alliant Energy directly for utility services, check number 5622 was determined to be improper.

- On January 14, 2014, Ms. Becker issued check number 6127 to JQS for \$18.40. By reviewing the image of the check, we determined the notation in the memo portion stated “postage.” JQS is John’s Quick Stop (Johns), a local convenience store.

As previously stated, we determined Ms. Becker used BDG’s credit card for a number of purchases at convenience stores which were determined to be improper. In addition, it is unlikely the disbursement was to purchase postage at the convenience stores as indicated by the memo. As a result, check number 6127 was determined to be improper.

We also identified 4 additional checks to John’s which were described as meeting expenses in the memo portion of the checks. Because it is possible Ms. Becker may have bought refreshments from the convenience store for a BDG event or the payments may have been personal in nature, the 4 payments were determined to be unsupported.

- During our review of disbursements from BDG’s checking account, we identified 23 payments to the same internet services vendor from July 2010 through the end of April 2013 when Ms. Becker was laid-off due to budget constraints. According to Board minutes, phone and internet services were also terminated at the BDG office at the same time.

However, in addition to the 23 payments, we identified 4 additional payments to Price Industrial Electric and Eastern Iowa Computer Services (EICS). The 4 payments ranged from \$22.90 to \$200.18 and total \$409.48. Because supporting documentation was not available for the payments and we were unable to determine their propriety, they were determined to be unsupported.

- We identified a number of disbursements which Ms. Becker described as “office supplies” in the memo. Some of the disbursements were supported by appropriate documentation. However, a number of purchases to vendors such as Alco, RJ Enders, Monkeytown, and LaGrange’s for which supporting documentation was not available. Each of these vendors sold merchandise or services in the local area. As illustrated by **Exhibit E**, the purchases were frequent and the amounts ranged significantly.

The frequency and amount of purchases which were described by Ms. Becker in the memo as “office supplies” seems unusually high for an office where she was

the only employee. The 41 checks listed in Exhibit E which were described by Ms. Becker as “office supplies” total \$3,956.28, or an average of \$96.49 per purchase. Because each of these vendors sell items which may be used for personal purposes and we are unable to determine the propriety of the purchases without appropriate documentation, they were determined to be unsupported.

- We identified 14 purchases from Fareway which total \$1,108.81. The purchases ranged from \$2.88 to \$148.43 and all were described as meeting expenses in the memo. We also identified payments to several other vendors which were described as meeting expenses.

Because sufficient documentation was not available to determine the propriety of the purchases and personal purchases could be made from each of the vendors identified, the purchases described as meeting expenses were determined to be unsupported.

**Bank Charges** – During our review of BDG’s bank statements, we identified a number of instances in which overdraft and service charges were incurred. **Table 7** summarizes the costs identified by bank account.

| <b>Table 7</b> |                    |
|----------------|--------------------|
| <b>Account</b> | <b>Amount</b>      |
| #XXX03         | \$ 518.05          |
| #XXX53         | 477.70             |
| #XXX64         | 139.10             |
| Total          | <u>\$ 1,134.85</u> |

Because the Executive Director should have ensured the BDG’s bank account contained sufficient funds prior to issuing disbursements from the accounts, the \$1,134.85 of bank charges is included in **Exhibit A** as improper disbursements.

## **UNDEPOSITED COLLECTIONS**

BDG’s primary source of revenues is Benton County. We confirmed all payments to BDG by Benton County were properly deposited to BDG’s bank accounts and we confirmed BDG did not receive any funds from the State of Iowa.

BDG also receives collections from fundraisers, membership fees, and contributions from businesses and organizations. However, we were unable to locate any receipts, supporting documentation, or any types of lists of fundraisers, members or contributors. While Board minutes included mentions of certain types of collections, sufficient information was not available to determine if the collections were deposited to BDG’s bank accounts intact or in a timely manner. As a result, we were unable to determine if all collections were properly deposited to BDG’s bank accounts.

## **OTHER ADMINISTRATIVE ISSUES**

**Oversight** - As previously stated, a new Board was put in place at BDG in January 2014. We determined during our investigation the prior Board did not properly carry out its fiduciary responsibilities, including requesting and comparing disbursements to supporting documentation and checks, regularly reviewing the financial reports and/or bank statements, and maintaining sufficient supporting documentation.

Board minutes from this period document event and meeting dates and locations were discussed prior to and following the events; however, there was no reporting of related costs or results of

those activities. In addition, the minutes refer to reports provided by the Executive Director; however, written reports could not be located. The current Executive Board members stated Ms. Becker initially attempted to provide only verbal reports when they started and they suspect that is what had occurred with the previous Board.

**Taxable meals** – As previously stated, sufficient payroll records were not available from BDG, including a payroll register and W-2's. As a result, we are unable to determine if meals reimbursed to Ms. Becker when she attended events on behalf of BDG were properly captured as taxable meals in accordance with Internal Revenue Service (IRS) regulations. These regulations require the value of any meal provided by the employer or reimbursed to the employee when the employee is not "in travel status" or has not traveled overnight be reported as a taxable benefit on the employee's annual W-2 form.

### **Recommended Control Procedures**

As part of our investigation, we reviewed the procedures used by the Benton Development Group to perform bank reconciliations and process receipts and disbursements. An important aspect of internal control is to establish procedures which provide accountability for assets susceptible to loss from errors and irregularities. These procedures provide the actions of one individual will act as a check on those of another and provide a level of assurance errors or irregularities will be identified within a reasonable time during the course of normal operations. Based on our findings and observations detailed below, the following recommendations are made to strengthen the BDG's internal controls.

- A. **Segregation of Duties** - An important aspect of internal control is the segregation of duties among employees to prevent an individual employee from handling duties which are incompatible. The former Executive Director had control over each of the following areas:
- 1) Receipts – collecting, posting, deposit preparation and depositing.
  - 2) Disbursements – check preparation, signing, posting, and distribution.
  - 3) Payroll – check preparation, signing, posting, and distribution.
  - 4) Bank accounts – receiving and reconciling monthly bank statements to accounting records.

**Recommendation** - We realize segregation of duties is difficult with a limited number of office employees. However, the functions listed above should be segregated between the Executive Director, the President, Treasurer, or other appointed independent party. In addition, Executive Board members should review financial records, perform reconciliations, and examine supporting documentation for accounting records on a periodic basis.

Also, bank statements should be delivered to an official who does not collect or disburse funds. The bank statements should be reviewed in a timely manner for unusual activity. Bank reconciliations should be performed monthly and should be reviewed by someone independent of other financial responsibilities. The reviews should be documented by the signature or initials of the reviewer and the date of the review.

- B. **Minutes of Board Meetings** – During our review of Board minutes, we determined there was no reporting of related costs or results of activities reported to the Board. In addition, the minutes refer to reports provided by the Executive Director; however, written reports could not be located.



Recommendation - The Board should ensure all BDG's obligations are presented to the Board for its approval and all payments are made in the amount approved by the Board. In addition, all collections should be reported to the Board in a timely manner and the Board should make inquiries when information is not sufficient for members to properly carry out their fiduciary responsibilities.

C. Payroll and Travel Reimbursements - During our review of payments to the former Executive Director, the following concerns were identified:

- (1) A payroll register was not prepared and/or maintained which documented authorized gross pay and the deductions withheld from the former Executive Director's payroll amounts.
- (2) Procedures were not in place to ensure the former Executive Director did not receive more than her authorized salary amount or payroll was not received in advance of the end of the authorized pay period.
- (3) Reimbursement reports were not maintained for all payments to the former Executive Director.
- (4) Certain travel reimbursements were issued prior to the reported dates of travel and, in some cases, only destinations were listed on reimbursement reports without corresponding dates of travel.

Recommendation - The Board should ensure payroll checks are included in the payments listing presented to the Board for approval. In addition, a payroll register should be maintained and periodically reviewed by someone independent of payroll preparation. The periodic review should also include ensuring increases to gross pay are properly approved and calculated.

All travel reimbursements should be included in the payments listing presented to the Board for approval. They should also be supported by adequate reimbursement reports which include dates, destinations, descriptions of events, and any other related supporting documentation. In addition, travel reimbursements should not be issued in advance of travel.

D. Supporting Documentation - Sufficient supporting documentation was not available for a number of disbursements from BDG's bank accounts and purchases made with BDG's credit card. As a result, we were unable to determine propriety for certain transactions.

Recommendation - The Board should ensure sufficient supporting documentation for all financial transactions is maintained, all electronic records are backed up, and the back-ups are maintained off-site. Board members should also ensure the minutes include a detailed listing of all payments approved by the Board.

E. Credit Cards - BDG had a credit card. Using the records obtained from the credit card issuer, we identified several improper purchases. In addition, we determined the BDG incurred finance charges and late fees because the former Executive Director did not pay the balance on the credit card each month and/or did not make payments in a timely manner.

Recommendation - Original receipts should be submitted to the Treasurer for purchases made with the credit card. In addition, the Board should document allowable uses for the credit card and appropriate dollar limits on purchases.

The Executive Board should also periodically review the credit card statements to ensure charges appear appropriate and payments are made in a timely manner so finance charges or late fees are not incurred.

- F. Executive Board Oversight – The Board has a fiduciary responsibility to provide oversight of the BDG’s operations and financial transactions. Oversight is typically defined as the “watchful and responsible care” a governing body exercises in its fiduciary capacity.

Based on our observations and the procedures we performed, we determined the previous Board failed to exercise proper fiduciary oversight. The lack of appropriate oversight and the failure to ensure implementation of adequate internal controls permitted an employee to exercise too much control over BDG’s operations.

Recommendation – Oversight by the Board is essential and should be an ongoing effort by all members. The current Board should continue to exercise due care and require and review pertinent information and documentation prior to making decisions affecting BDG. In addition, appropriate policies and procedures should be adopted, implemented, and monitored to ensure compliance with established policies and procedures.

- G. Taxable Meals - We were unable to determine if meals reimbursed to the former Executive Director when she attended events on behalf of BDG were properly captured as taxable meals in accordance with IRS regulations. These regulations require the value of any meal provided by the employer or reimbursed to the employee when the employee is not “in travel status” or has not traveled overnight be reported as a taxable benefit on the employee’s annual W-2 form.

Recommendation – Board members should ensure adequate procedures are developed and implemented which ensure compliance with IRS regulations.

## **Exhibits**

**Benton Development Group**

Report on Special Investigation of the  
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Summary of Findings  
For the period January 1, 2009 through August 31, 2014

| <b>Description</b>                           | <b>Exhibit /<br/>Table / Page</b> | <b>Improper</b>     | <b>Unsupported</b> | <b>Total</b>     |
|--|-----------------------------------|---------------------|--------------------|------------------|
| Improper and unsupported disbursements:      |                                   |                     |                    |                  |
| Credit card purchases                        | <b>Exhibit B</b>                  | \$ 17,435.51        | 2,188.55           | 19,624.06        |
| Beginning balance of credit card             | <b>Page 13</b>                    | -                   | 1,435.76           | 1,435.76         |
| Late fees, finance charges, and interest     | <b>Page 13</b>                    | 1,136.41            | -                  | 1,136.41         |
| Unauthorized checks to Ranae Becker          | <b>Table 4</b>                    | 11,779.98           | -                  | 11,779.98        |
| Incorrect payroll amounts                    | <b>Table 4</b>                    | 133.64              | -                  | 133.64           |
| Employer's share of FICA                     | <b>Page 17</b>                    | 911.39              | -                  | 911.39           |
| Mileage payments to Ranae Becker             | <b>Page 19</b>                    | 4,208.38            | -                  | 4,208.38         |
| Reimbursements for internet services         | <b>Page 19</b>                    | 1,815.00            | -                  | 1,815.00         |
| Payments to vendors                          | <b>Exhibit E</b>                  | 134.22              | 7,320.67           | 7,454.89         |
| Overdraft fees and service charges           | <b>Table 4</b>                    | 1,134.85            | -                  | 1,134.85         |
| Total improper and unsupported disbursements |                                   | <u>\$ 38,689.38</u> | <u>10,944.98</u>   | 49,634.36        |
| Less: Payments on credit card not by BDG     | <b>Page 13</b>                    |                     |                    | (855.00)         |
| Net improper and unsupported disbursements   |                                   |                     | <u>\$</u>          | <u>48,779.36</u> |

Report on Special Investigation of the  
Benton Development Group

Credit Card Purchases  
For the period January 1, 2009 through August 31, 2014

| Per Credit Card Statement |                  |  |                  |           |
|---------------------------|------------------|--|------------------|-----------|
| Day of the Week           | Transaction Date | Vendor                                 | Location         | Amount    |
| Monday                    | 01/19/09         | Qwest Comm 800-244-1111                | CO               | \$ 157.23 |
| Wednesday                 | 01/21/09         | Iowa Volleyball Region 515-7271860     | IA               | 38.00     |
| Wednesday                 | 01/21/09         | Benton/Linn Wireless LLC               | Vinton, IA       | 370.43    |
| Tuesday                   | 02/03/09         | Iowa Secretary of State                | IA               | 30.00     |
| Wednesday                 | 02/25/09         | Coralville Sho00280008                 | Coralville, IA   | 15.00     |
| Wednesday                 | 02/25/09         | Walmart #0830                          | Rock Falls, IL   | 54.30     |
| Thursday                  | 02/26/09         | Norridge Minuteman Q39                 | Norridge, IL     | 21.00     |
| Thursday                  | 02/26/09         | Renaissance Hotels                     | Chicago, IL      | 176.28    |
| Thursday                  | 02/26/09         | Renaissance Hotels                     | Chicago, IL      | 10.00     |
| Monday                    | 03/02/09         | The Rusty Putter Steak                 | Roscoe, IL       | 69.71     |
| Monday                    | 03/02/09         | Fairfield Inn                          | Beloit, WI       | 135.07    |
| Sunday                    | 03/08/09         | UI Atheltic Tickets 319-335-9311       | IA               | 49.00     |
| Sunday                    | 03/08/09         | Benton/Linn Wireless LLC               | Vinton, IA       | 76.65     |
| Sunday                    | 03/08/09         | Theissen's of Vinton                   | Vinton, IA       | 83.41     |
| Friday                    | 03/27/09         | Qwest Comm 800-244-1111                | CO               | 277.71    |
| Sunday                    | 03/29/09         | Git N Go                               | Marshalltown, IA | 25.00     |
| Sunday                    | 04/12/09         | Benton/ Linn Wireless LLC              | Vinton, IA       | 300.00    |
| Sunday                    | 05/03/09         | Marriott 33738                         | Chicago, IL      | 294.27    |
| Monday                    | 05/04/09         | Capis Italian Ktch                     | Chicago, IL      | 20.06     |
| Thursday                  | 05/07/09         | Marriott 33738 F&B                     | Chicago, IL.     | 14.83     |
| Friday                    | 05/08/09         | Row Self Park #0410                    | Chicago, IL.     | 144.00    |
| Friday                    | 05/08/09         | Marriott 33738                         | Chicago, IL.     | 588.57    |
| Friday                    | 05/08/09         | IL Tollway-Miss Toll Pymt 800-824-7277 | IL               | 2.00      |
| Friday                    | 05/08/09         | RMS Travel                             | DeKalb, IL       | 35.59     |
| Friday                    | 05/08/09         | Exxon Mobil                            | DeKalb, IL       | 28.00     |
| Sunday                    | 05/24/09         | Casey's                                | Belle Plaine, IA | 28.44     |
| Thursday                  | 05/28/09         | Sun Market and 10037455                | Fort Dodge, IA   | 17.00     |
| Thursday                  | 05/28/09         | Best Buy                               | Sioux City, IA   | 256.77    |
| Friday                    | 05/29/09         | Applebee's                             | Sioux City, IA   | 51.32     |

| Improper | Unsupported | Reasonable |
|----------|-------------|------------|
| 157.23   | -           | -          |
| 38.00    | -           | -          |
| 370.43   | -           | -          |
| -        | -           | 30.00      |
| -        | 15.00       | -          |
| 54.30    | -           | -          |
| 21.00    | -           | -          |
| -        | -           | 176.28     |
| -        | -           | 10.00      |
| -        | -           | 69.71      |
| -        | 135.07      | -          |
| 49.00    | -           | -          |
| 76.65    | -           | -          |
| 83.41    | -           | -          |
| 277.71   | -           | -          |
| 25.00    | -           | -          |
| 300.00   | -           | -          |
| -        | -           | 294.27     |
| -        | -           | 20.06      |
| -        | -           | 14.83      |
| -        | -           | 144.00     |
| -        | -           | 588.57     |
| -        | -           | 2.00       |
| 35.59    | -           | -          |
| 28.00    | -           | -          |
| 28.44    | -           | -          |
| 17.00    | -           | -          |
| 256.77   | -           | -          |
| 51.32    | -           | -          |

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| Per Credit Card Statement |                  |   |                    |        |
|---------------------------|------------------|---|--------------------|--------|
| Day of the Week           | Transaction Date | Vendor                                    | Location           | Amount |
| Sunday                    | 05/31/09         | Sweet Fannys                              | Sioux City, IA     | 58.97  |
| Sunday                    | 05/31/09         | Qwest Comm 800-244-1111                   | CO                 | 333.27 |
| Sunday                    | 05/31/09         | Get N Go #8                               | Sioux Falls, SD    | 28.00  |
| Sunday                    | 05/31/09         | Huhot                                     | Sioux City, IA     | 52.32  |
| Monday                    | 06/01/09         | Fairfield Inn                             | Sioux City, IA     | 302.37 |
| Monday                    | 06/01/09         | Bucky's Express #17                       | Council Bluffs, IA | 18.25  |
| Tuesday                   | 06/02/09         | PayPal *Weathercall 402-935-7733          | CO                 | 6.95   |
| Tuesday                   | 06/02/09         | Ehlingers 4 St <i>[convenience store]</i> | Vinton, IA         | 24.50  |
| Thursday                  | 06/04/09         | Casey's                                   | Toledo, IA         | 31.00  |
| Sunday                    | 06/07/09         | Ryans #2195 Q82                           | Cedar Rapids, IA   | 38.46  |
| Sunday                    | 06/07/09         | WM Supercenter                            | Cedar Rapids, IA   | 111.46 |
| Sunday                    | 06/07/09         | Menards                                   | Marion, IA         | 78.25  |
| Tuesday                   | 06/09/09         | John's Qwik Stop                          | Vinton, IA         | 40.00  |
| Tuesday                   | 06/09/09         | Pizza Ranch                               | Vinton, IA         | 23.08  |
| Monday                    | 06/15/09         | John's Qwik Stop                          | Vinton, IA         | 30.00  |
| Wednesday                 | 06/17/09         | Speedpay Fee-IES Utilit 212-7919700       | NY                 | 4.50   |
| Wednesday                 | 06/17/09         | Shell Oil                                 | Milan, IL          | 61.00  |
| Wednesday                 | 06/17/09         | Alliant Energy- IES Util 319-7864752      | WI                 | 326.61 |
| Friday                    | 07/17/09         | Holiday Food Store                        | Virginia Beach, VA | 56.01  |
| Monday                    | 07/20/09         | Shell Oil                                 | Frankfort, KY      | 32.00  |
| Monday                    | 07/20/09         | Shell Oil                                 | Mechanicsville, VA | 33.50  |
| Tuesday                   | 07/21/09         | Pilot                                     | Covington, IN      | 28.00  |
| Wednesday                 | 07/22/09         | Alco                                      | Vinton, IA         | 32.36  |
| Thursday                  | 07/23/09         | Pizza Ranch                               | Vinton, IA         | 35.48  |
| Wednesday                 | 08/12/09         | Internet Hotel Reservation                | MO                 | 167.94 |
| Monday                    | 08/17/09         | Milwaukee County Zoo                      | Milwaukee, WI      | 59.00  |
| Monday                    | 08/17/09         | Lucky Buffet                              | Independence, IA   | 30.50  |
| Thursday                  | 08/27/09         | Benton/Linn Wireless LLC                  | Vinton, IA         | 400.00 |
| Monday                    | 08/31/09         | Burger King                               | Independence, IA   | 14.20  |



| Improper | Unsupported | Reasonable |
|----------|-------------|------------|
| 58.97    | -           | -          |
| 333.27   | -           | -          |
| 28.00    | -           | -          |
| 52.32    | -           | -          |
| -        | -           | 302.37     |
| 18.25    | -           | -          |
| 6.95     | -           | -          |
| 24.50    | -           | -          |
| 31.00    | -           | -          |
| 38.46    | -           | -          |
| 111.46   | -           | -          |
| 78.25    | -           | -          |
| 40.00    | -           | -          |
| 23.08    | -           | -          |
| 30.00    | -           | -          |
| 4.50     | -           | -          |
| 61.00    | -           | -          |
| 326.61   | -           | -          |
| 56.01    | -           | -          |
| 32.00    | -           | -          |
| 33.50    | -           | -          |
| 28.00    | -           | -          |
| -        | 32.36       | -          |
| 35.48    | -           | -          |
| -        | 167.94      | -          |
| 59.00    | -           | -          |
| 30.50    | -           | -          |
| 400.00   | -           | -          |
| 14.20    | -           | -          |

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Credit Card Purchases  
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| Per Credit Card Statement |                  |                                       |                  |        |
|---------------------------|------------------|---------------------------------------|------------------|--------|
| Day of the Week           | Transaction Date | Vendor                                | Location         | Amount |
| Friday                    | 09/25/09         | Casey's                               | Cedar Rapids, IA | 20.01  |
| Sunday                    | 09/27/09         | The Olive Garden                      | Cedar Rapids, IA | 30.44  |
| Monday                    | 09/28/09         | Casey's                               | Cedar Rapids, IA | 20.01  |
| Thursday                  | 10/01/09         | Totara Petroleum Inc                  | Marshalltown, IA | 10.00  |
| Thursday                  | 10/01/09         | John's Qwik Stop                      | Vinton, IA       | 26.75  |
| Thursday                  | 10/08/09         | Quiznos Sub                           | Monticello, MN   | 8.53   |
| Thursday                  | 10/08/09         | Cantina #1 MOA LLC                    | Bloomington, MN  | 22.13  |
| Friday                    | 10/09/09         | Courtyard by Marriott                 | Bloomington, MN  | 28.35  |
| Friday                    | 10/09/09         | Kincaid's                             | Bloomington, MN  | 47.00  |
| Sunday                    | 10/11/09         | Courtyard by Marriott                 | Bloomington, MN  | 604.83 |
| Sunday                    | 10/11/09         | The Milll BP                          | Holland, IA      | 77.46  |
| Sunday                    | 10/18/09         | Springhill Suites                     | W Des Moines, IA | 110.88 |
| Wednesday                 | 10/21/09         | Pizza Hut                             | Vinton, IA       | 31.22  |
| Sunday                    | 10/25/09         | UNO Chicago Grill #767                | Schaumburg, IL   | 32.06  |
| Monday                    | 10/26/09         | Casey's                               | Cedar Rapids, IA | 41.00  |
| Wednesday                 | 11/11/09         | Kwik Trip                             | Owatonna, MN     | 26.00  |
| Sunday                    | 12/20/09         | Walmart                               | Cedar Rapids, IA | 412.25 |
| Sunday                    | 12/20/09         | Radioshack                            | Cedar Rapids, IA | 55.62  |
| Sunday                    | 12/20/09         | OCB #0286 <i>[Old Country Buffet]</i> | Coralville, IA   | 43.53  |
| Sunday                    | 12/20/09         | Gamestop                              | Cedar Rapids, IA | 64.19  |
| Monday                    | 12/21/09         | John's Qwik Stop                      | Vinton, IA       | 27.01  |
| Monday                    | 12/21/09         | Best Buy                              | Cedar Rapids, IA | 68.13  |
| Tuesday                   | 12/22/09         | John's Qwik Stop                      | Vinton, IA       | 40.01  |
| Monday                    | 12/28/09         | John's Qwik Stop                      | Vinton, IA       | 30.00  |
| Friday                    | 02/12/10         | Grand Harbor Resort                   | Dubuque, IA      | 239.68 |
| Friday                    | 02/12/10         | Grand Harbor Resort                   | Dubuque, IA      | 222.88 |
| Sunday                    | 02/28/10         | Grand Harbor Resort                   | Dubuque, IA      | 88.65  |
| Wednesday                 | 03/10/10         | Uncle Buck's Fishbowl                 | Altoona, IA      | 21.26  |
| Thursday                  | 03/11/10         | Gaylord Orpyland Htl F/D              | Nashville, TN    | 76.00  |

| Improper | Unsupported | Reasonable |
|----------|-------------|------------|
| 20.01    | -           | -          |
| 30.44    | -           | -          |
| 20.01    | -           | -          |
| 10.00    | -           | -          |
| 26.75    | -           | -          |
| -        | -           | 8.53       |
| -        | -           | 22.13      |
| -        | -           | 28.35      |
| -        | -           | 47.00      |
| -        | -           | 604.83     |
| 77.46    | -           | -          |
| -        | -           | 110.88     |
| 31.22    | -           | -          |
| 32.06    | -           | -          |
| 41.00    | -           | -          |
| 26.00    | -           | -          |
| -        | 412.25      | -          |
| -        | 55.62       | -          |
| 43.53    | -           | -          |
| 64.19    | -           | -          |
| 27.01    | -           | -          |
| 68.13    | -           | -          |
| 40.01    | -           | -          |
| 30.00    | -           | -          |
| -        | 239.68      | -          |
| -        | 222.88      | -          |
| -        | 88.65       | -          |
| -        | 21.26       | -          |
| -        | -           | 76.00      |

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| Per Credit Card Statement |                  |   |                  |        |
|---------------------------|------------------|---|------------------|--------|
| Day of the Week           | Transaction Date | Vendor                                    | Location         | Amount |
| Friday                    | 03/12/10         | Airport Parking Ramp                      | Des Moines, IA   | 44.00  |
| Friday                    | 03/12/10         | Gaylord Orpyland Htl F/D                  | Nashville, TN    | 68.05  |
| Wednesday                 | 03/17/10         | Palo, Mini Mart                           | Palo, IA         | 21.00  |
| Tuesday                   | 03/23/10         | Ehlingers 4 St <i>[convenience store]</i> | Vinton, IA       | 30.00  |
| Thursday                  | 04/01/10         | I Wireless No 38                          | Vinton, IA       | 298.00 |
| Friday                    | 04/02/10         | American Ai                               | San Antonio, TX  | 379.40 |
| Friday                    | 04/09/10         | Iowa Wireless - RITA 515-2581000          | IA               | 268.56 |
| Wednesday                 | 04/28/10         | PDI 515-243-1558                          | IA               | 25.00  |
| Thursday                  | 05/20/10         | Fareway                                   | Vinton, IA       | 95.21  |
| Sunday                    | 05/23/10         | Sheraton FB                               | Dallas, TX       | 9.63   |
| Monday                    | 05/24/10         | Sheraton FB                               | Dallas, TX       | 4.71   |
| Tuesday                   | 05/25/10         | Sheraton FB                               | Dallas, TX       | 9.04   |
| Wednesday                 | 05/26/10         | Sheraton                                  | Dallas, TX       | 697.55 |
| Saturday                  | 05/29/10         | Marriott                                  | W Des Moines, IA | 116.48 |
| Sunday                    | 05/30/10         | Ehlingers 4 St <i>[convenience store]</i> | Vinton, IA       | 54.50  |
| Monday                    | 05/31/10         | Alco                                      | Vinton, IA       | 22.69  |
| Monday                    | 05/31/10         | Pizza Ranch                               | Vinton, IA       | 17.95  |
| Tuesday                   | 06/15/10         | CTO*GOTOMYPC.COM 888-259-3826             | CA               | 9.95   |
| Wednesday                 | 06/23/10         | Casey's                                   | Urbana, IA       | 50.00  |
| Friday                    | 07/16/10         | CTO*GOTOMYPC.COM 888-259-3826             | CA               | 9.95   |
| Tuesday                   | 08/24/10         | CTO*GOTOMYPC.COM 888-259-3826             | CA               | 9.95   |
| Monday                    | 08/30/10         | PDI 515-243-1558                          | IA               | 250.00 |
| Monday                    | 08/30/10         | John's Qwik Stop                          | Vinton, IA       | 50.00  |
| Monday                    | 08/30/10         | Dish Network - One Time 800-894-9131      | CO               | 196.16 |
| Friday                    | 09/03/10         | I Wireless                                | Vinton, IA       | 345.00 |
| Monday                    | 09/06/10         | Ehlingers 4 St <i>[convenience store]</i> | Vinton, IA       | 50.00  |
| Saturday                  | 09/25/10         | CTO*GOTOMYPC.COM 888-259-3826             | CA               | 9.95   |
| Thursday                  | 10/21/10         | Martinis Grill                            | Burlington, IA   | 9.63   |
| Friday                    | 10/22/10         | Fareway                                   | Vinton, IA       | 23.96  |

| <b>Improper</b> | <b>Unsupported</b> | <b>Reasonable</b> |
|-----------------|--------------------|-------------------|
| -               | -                  | 44.00             |
| -               | -                  | 68.05             |
| 21.00           | -                  | -                 |
| 30.00           | -                  | -                 |
| 298.00          | -                  | -                 |
| -               | -                  | 379.40            |
| 268.56          | -                  | -                 |
| -               | -                  | 25.00             |
| -               | 95.21              | -                 |
| -               | -                  | 9.63              |
| -               | -                  | 4.71              |
| -               | -                  | 9.04              |
| -               | -                  | 697.55            |
| -               | -                  | 116.48            |
| 54.50           | -                  | -                 |
| -               | 22.69              | -                 |
| 17.95           | -                  | -                 |
| 9.95            | -                  | -                 |
| 50.00           | -                  | -                 |
| 9.95            | -                  | -                 |
| 9.95            | -                  | -                 |
| -               | -                  | 250.00            |
| 50.00           | -                  | -                 |
| 196.16          | -                  | -                 |
| 345.00          | -                  | -                 |
| 50.00           | -                  | -                 |
| 9.95            | -                  | -                 |
| -               | -                  | 9.63              |
| 23.96           | -                  | -                 |

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| Per Credit Card Statement |                  |  |                  |        |
|---------------------------|------------------|--|------------------|--------|
| Day of the Week           | Transaction Date | Vendor   | Location         | Amount |
| Friday                    | 10/22/10         | Fairfield Inn                                  | Burlington, IA   | 95.15  |
| Friday                    | 10/22/10         | Big Muddy                                      | Burlington, IA   | 17.94  |
| Friday                    | 10/22/10         | Fun City                                       | Burlington, IA   | 25.50  |
| Monday                    | 10/25/10         | CTO*GOTOMYPC.COM 888-259-3826                  | CA               | 9.95   |
| Friday                    | 10/29/10         | Mini Mart                                      | Palo, IA         | 50.01  |
| Saturday                  | 10/30/10         | Reliable 800-359-5000 <i>[Office supplies]</i> | IL               | 105.73 |
| Monday                    | 11/08/10         | DTI* Day - Timers Inc.                         | PA               | 55.05  |
| Wednesday                 | 11/10/10         | John's Qwik Stop                               | Vinton, IA       | 50.01  |
| Friday                    | 11/12/10         | Casey's  | Cedar Rapids, IA | 35.50  |
| Wednesday                 | 11/17/10         | I Wireless                                     | Vinton, IA       | 100.00 |
| Wednesday                 | 11/17/10         | Dish Network - One Time 800-894-9131           | CO               | 105.00 |
| Thursday                  | 11/25/10         | CTO*GOTOMYPC.COM 888-259-3826                  | CA               | 9.95   |
| Saturday                  | 11/27/10         | I Wireless                                     | Vinton, IA       | 434.37 |
| Saturday                  | 12/25/10         | CTO*GOTOMYPC.COM 888-259-3826                  | CA               | 9.95   |
| Tuesday                   | 12/28/10         | Franklin Covey Products 800-819-1812           | UT               | 33.29  |
| Tuesday                   | 01/25/11         | CTO*GOTOMYPC.COM 888-259-3826                  | CA               | 9.95   |
| Wednesday                 | 02/23/11         | Dish Network - One Time 800-894-9131           | CO               | 210.26 |
| Wednesday                 | 02/23/11         | Walmart  | Marshalltown, IA | 78.98  |
| Thursday                  | 02/24/11         | PayPal *EDSolutions 402-935-7733               | CA               | 79.00  |
| Friday                    | 02/25/11         | CTO*GOTOMYPC.COM 888-259-3826                  | CA               | 9.95   |
| Monday                    | 03/14/11         | Speedway Fee - IES Utility                     | NY               | 4.50   |
| Monday                    | 03/14/11         | Speedway Fee - IES Utility                     | NY               | 4.50   |
| Monday                    | 03/14/11         | Alliant Energy - IES Utility                   | WI               | 225.00 |
| Monday                    | 03/14/11         | Alliant Energy - IES Utility                   | WI               | 600.00 |
| Friday                    | 03/25/11         | CTO*GOTOMYPC.COM 888-259-3826                  | CA               | 9.95   |
| Monday                    | 04/25/11         | CTO*GOTOMYPC.COM 888-259-3826                  | CA               | 9.95   |
| Friday                    | 05/06/11         | Renaissance Hotels Savery                      | Des Moines, IA   | 200.48 |
| Tuesday                   | 05/10/11         | Travelocity Hotel Reserv 800-256-9089          | TX               | 143.84 |
| Friday                    | 05/13/11         | Amazon Marketplace Pmts                        | Amazon. com      | 32.14  |

| Improper | Unsupported | Reasonable |
|----------|-------------|------------|
| -        | -           | 95.15      |
| -        | -           | 17.94      |
| -        | -           | 25.50      |
| 9.95     | -           | -          |
| 50.01    | -           | -          |
| -        | 105.73      | -          |
| 55.05    | -           | -          |
| 50.01    | -           | -          |
| 35.50    | -           | -          |
| 100.00   | -           | -          |
| 105.00   | -           | -          |
| 9.95     | -           | -          |
| 434.37   | -           | -          |
| 9.95     | -           | -          |
| -        | 33.29       | -          |
| 9.95     | -           | -          |
| 210.26   | -           | -          |
| 78.98    | -           | -          |
| 79.00    | -           | -          |
| 9.95     | -           | -          |
| 4.50     | -           | -          |
| 4.50     | -           | -          |
| 225.00   | -           | -          |
| 600.00   | -           | -          |
| 9.95     | -           | -          |
| 9.95     | -           | -          |
| -        | -           | 200.48     |
| -        | 143.84      | -          |
| 32.14    | -           | -          |

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|---------------------------|------------------|--|--------------------|--------|
| Day of the Week           | Transaction Date | Vendor                                   | Location           | Amount |
| Saturday                  | 05/14/11         | Amazon Marketplace Pmts                  | Amazon. com        | 17.42  |
| Tuesday                   | 05/24/11         | Parking Inc.                             | Des Moines, IA     | 8.00   |
| Wednesday                 | 05/25/11         | Parking Inc.                             | Des Moines, IA     | 10.00  |
| Wednesday                 | 05/25/11         | CTO*GOTOMYPC.COM 888-259-3826            | CA                 | 9.95   |
| Monday                    | 06/13/11         | Speedway Fee - IES Utility               | NY                 | 4.50   |
| Monday                    | 06/13/11         | Alliant Energy - IES Utility             | WI                 | 275.00 |
| Friday                    | 06/24/11         | Shore Drive BP                           | Virginia Beach, VA | 78.02  |
| Saturday                  | 06/25/11         | Ruby Tuesday                             | Norfolk, VA        | 138.75 |
| Saturday                  | 06/25/11         | CTO*GOTOMYPC.COM 888-259-3826            | CA                 | 9.95   |
| Sunday                    | 06/26/11         | Shell Oil                                | Columbus, IN       | 47.00  |
| Sunday                    | 06/26/11         | 7-Eleven                                 | Glenn Allen, VA    | 37.00  |
| Tuesday                   | 06/28/11         | Walmart                                  | Cedar Rapids, IA   | 39.85  |
| Wednesday                 | 07/06/11         | Totara Petroleum                         | Marshalltown, IA   | 20.00  |
| Monday                    | 07/11/11         | Iowa Wireless 18885504497 [Cedar Rapids] | IA                 | 698.13 |
| Monday                    | 07/25/11         | CTO*GOTOMYPC.COM 888-259-3826            | CA                 | 9.95   |
| Tuesday                   | 08/16/11         | Go America                               | Urbana, IA         | 30.00  |
| Thursday                  | 08/25/11         | CTO*GOTOMYPC.COM 888-259-3826            | CA                 | 9.95   |
| Thursday                  | 09/08/11         | Adobe Systems 800-833-6687               | WA                 | 99.99  |
| Sunday                    | 09/25/11         | CTO*GOTOMYPC.COM 888-259-3826            | CA                 | 9.95   |
| Wednesday                 | 09/28/11         | Fun City                                 | Burlington, IA     | 30.00  |
| Friday                    | 09/30/11         | Catfish Bend Inn & Spa                   | Burlington, IA     | 221.76 |
| Friday                    | 10/14/11         | K Mart                                   | Marshalltown, IA   | 87.06  |
| Wednesday                 | 10/19/11         | Bridges Bay Resort                       | Arnolds Park, IA   | 634.70 |
| Wednesday                 | 10/19/11         | Walmart                                  | Spirit Lake, IA    | 84.61  |
| Saturday                  | 10/22/11         | Boonedocks                               | Arnolds Park, IA   | 39.50  |
| Saturday                  | 11/19/11         | Walmart                                  | Cedar Rapids, IA   | 180.79 |
| Wednesday                 | 11/23/11         | Walmart                                  | Independence, IA   | 252.28 |
| Wednesday                 | 11/30/11         | CTO*GOTOMYPC.COM 888-259-3826            | CA                 | 99.00  |
| Friday                    | 12/09/11         | Amazon.com                               | Amazon. com        | 22.09  |



| <b>Improper</b> | <b>Unsupported</b> | <b>Reasonable</b> |
|-----------------|--------------------|-------------------|
| 17.42           | -                  | -                 |
| -               | -                  | 8.00              |
| -               | -                  | 10.00             |
| 9.95            | -                  | -                 |
| 4.50            | -                  | -                 |
| 275.00          | -                  | -                 |
| 78.02           | -                  | -                 |
| 138.75          | -                  | -                 |
| 9.95            | -                  | -                 |
| 47.00           | -                  | -                 |
| 37.00           | -                  | -                 |
| -               | 39.85              | -                 |
| 20.00           | -                  | -                 |
| 698.13          | -                  | -                 |
| 9.95            | -                  | -                 |
| 30.00           | -                  | -                 |
| 9.95            | -                  | -                 |
| -               | 99.99              | -                 |
| 9.95            | -                  | -                 |
| -               | -                  | 30.00             |
| -               | -                  | 221.76            |
| 87.06           | -                  | -                 |
| -               | -                  | 634.70            |
| 84.61           | -                  | -                 |
| 39.50           | -                  | -                 |
| 180.79          | -                  | -                 |
| 252.28          | -                  | -                 |
| 99.00           | -                  | -                 |
| 22.09           | -                  | -                 |

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|---------------------------|------------------|--------------------------------------|--------------------|--------|
| Day of the Week           | Transaction Date | Vendor                               | Location           | Amount |
| Saturday                  | 12/10/11         | Amazon.com                           | Amazon. com        | 291.49 |
| Tuesday                   | 03/13/12         | IA Secretary of State                | IA                 | 30.00  |
| Thursday                  | 04/05/12         | PDI 515-243-1558                     | IA                 | 449.00 |
| Saturday                  | 04/07/12         | Walmart                              | Cedar Rapids, IA   | 111.56 |
| Monday                    | 04/09/12         | Fifth Street Koffee Haus             | Vinton, IA         | 1.50   |
| Friday                    | 04/13/12         | Alliant Energy Payment               | WI                 | 552.77 |
| Thursday                  | 04/19/12         | Dish Network - One Time 800-894-9131 | CO                 | 209.08 |
| Friday                    | 04/20/12         | Amazon Mktplace Pmts                 | Amazon. com        | 27.19  |
| Tuesday                   | 04/24/12         | Amazon Mktplace Pmts                 | Amazon. com        | 35.85  |
| Wednesday                 | 04/25/12         | Paypal *Whittakeras 402-935-7733     | CA                 | 92.22  |
| Wednesday                 | 04/25/12         | OnStar 888-4ONSTAR                   | MI                 | 38.08  |
| Saturday                  | 05/05/12         | Renaissance Hotels Savery            | Des Moines, IA     | 232.96 |
| Monday                    | 05/14/12         | Alco                                 | Vinton, IA         | 26.73  |
| Thursday                  | 05/24/12         | OnStar 888-4ONSTAR                   | MI                 | 38.08  |
| Tuesday                   | 06/05/12         | Dish Network - One Time 800-894-9131 | CO                 | 101.04 |
| Wednesday                 | 06/06/12         | Walmart                              | Cedar Rapids, IA   | 146.91 |
| Wednesday                 | 06/06/12         | Vinton Pizza Ranch                   | Vinton, IA         | 55.61  |
| Wednesday                 | 06/06/12         | Johns Qwick Stop                     | Vinton, IA         | 64.51  |
| Thursday                  | 06/07/12         | Exxon Mobil                          | Belvidere, IL      | 47.00  |
| Friday                    | 06/08/12         | Sunoco                               | Verona, PA         | 42.00  |
| Friday                    | 06/08/12         | Sunoco                               | Genoa, OH          | 60.02  |
| Friday                    | 06/08/12         | Shell Oil                            | Woodbridge, VA     | 45.51  |
| Saturday                  | 06/09/12         | TJMaxx                               | Virginia Beach, VA | 141.70 |
| Saturday                  | 06/09/12         | Anthony & Vince Nails Spa            | Chesapeake, VA     | 88.00  |
| Monday                    | 06/11/12         | Walmart                              | Virginia Beach, VA | 105.42 |
| Tuesday                   | 06/12/12         | Sunstations                          | VA                 | 40.36  |
| Tuesday                   | 06/12/12         | Sunstations                          | VA                 | 67.54  |
| Tuesday                   | 06/12/12         | Diamond Springs BP                   | Virginia Beach, VA | 63.00  |
| Wednesday                 | 06/13/12         | The Look                             | Virginia Beach, VA | 41.99  |

| <b>Improper</b> | <b>Unsupported</b> | <b>Reasonable</b> |
|-----------------|--------------------|-------------------|
| 291.49          | -                  | -                 |
| -               | -                  | 30.00             |
| -               | -                  | 449.00            |
| 111.56          | -                  | -                 |
| 1.50            | -                  | -                 |
| 552.77          | -                  | -                 |
| 209.08          | -                  | -                 |
| 27.19           | -                  | -                 |
| 35.85           | -                  | -                 |
| 92.22           | -                  | -                 |
| 38.08           | -                  | -                 |
| -               | -                  | 232.96            |
| -               | 26.73              | -                 |
| 38.08           | -                  | -                 |
| 101.04          | -                  | -                 |
| -               | 146.91             | -                 |
| 55.61           | -                  | -                 |
| 64.51           | -                  | -                 |
| 47.00           | -                  | -                 |
| 42.00           | -                  | -                 |
| 60.02           | -                  | -                 |
| 45.51           | -                  | -                 |
| 141.70          | -                  | -                 |
| 88.00           | -                  | -                 |
| 105.42          | -                  | -                 |
| 40.36           | -                  | -                 |
| 67.54           | -                  | -                 |
| 63.00           | -                  | -                 |
| 41.99           | -                  | -                 |

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|---------------------------|------------------|---|--------------------|--------|
| Day of the Week           | Transaction Date | Vendor                                  | Location           | Amount |
| Wednesday                 | 06/13/12         | Finn McCools                            | Virginia Beach, VA | 58.14  |
| Thursday                  | 06/14/12         | Food Lion                               | Virginia Beach, VA | 69.45  |
| Saturday                  | 06/16/12         | Ross Stores                             | Virginia Beach, VA | 100.71 |
| Saturday                  | 06/16/12         | Exxon Mobil                             | Myersville, MD     | 45.00  |
| Saturday                  | 06/16/12         | Arrowhead Food Mart                     | Virginia Beach, VA | 50.00  |
| Sunday                    | 06/17/12         | Sunoco                                  | Broadview Hts., OH | 64.00  |
| Sunday                    | 06/17/12         | Loves Country                           | Roscoe, IL         | 51.00  |
| Sunday                    | 06/17/12         | ExxonMobil                              | Fremont, IN        | 46.00  |
| Friday                    | 06/22/12         | DirecTV Service 800-347-3288            | CA                 | 72.45  |
| Monday                    | 07/02/12         | Satellite Services LLC 877-574-3834     | AZ                 | 4.99   |
| Thursday                  | 08/02/12         | Satellite Services LLC 877-574-3834     | AZ                 | 4.99   |
| Friday                    | 08/03/12         | OnStar 888-4ONSTAR                      | MI                 | 38.08  |
| Tuesday                   | 08/07/12         | OnStar 888-4ONSTAR                      | MI                 | 38.03  |
| Wednesday                 | 08/22/12         | DirecTV Service 800-347-3288            | CA                 | 149.13 |
| Friday                    | 08/24/12         | OnStar 888-4ONSTAR                      | MI                 | 38.03  |
| Sunday                    | 09/02/12         | Satellite Services LLC 877-574-3834     | AZ                 | 4.99   |
| Monday                    | 09/10/12         | UNI Alumni Association                  | IA                 | 15.00  |
| Saturday                  | 09/22/12         | DirecTV Service 800-347-3288            | CA                 | 67.58  |
| Tuesday                   | 09/25/12         | I Wireless                              | Vinton, IA         | 295.52 |
| Wednesday                 | 09/26/12         | Caseys Gen Store                        | Bondurant, IA      | 30.51  |
| Friday                    | 09/28/12         | Pilot                                   | Altoona, IA        | 51.10  |
| Friday                    | 09/28/12         | Pilot                                   | Altoona, IA        | 16.51  |
| Saturday                  | 09/29/12         | Country Inn & Suites                    | Council Bluffs, IA | 172.48 |
| Saturday                  | 09/29/12         | Riverside Travel Mrt                    | Riverside, IA      | 40.00  |
| Tuesday                   | 10/02/12         | Satellite Services LLC 877-574-3834     | AZ                 | 4.99   |
| Tuesday                   | 10/02/12         | OnStar 888-4ONSTAR                      | MI                 | 38.03  |
| Thursday                  | 10/04/12         | Act- Iowa Economic Dev [conference fee] | CA                 | 210.00 |
| Wednesday                 | 10/10/12         | Ronnenburg Restaurant                   | Amana, IA          | 22.62  |
| Friday                    | 10/12/12         | Applebee's                              | Ottumwa, IA        | 68.71  |

| Improper | Unsupported | Reasonable |
|----------|-------------|------------|
| 58.14    | -           | -          |
| 69.45    | -           | -          |
| 100.71   | -           | -          |
| 45.00    | -           | -          |
| 50.00    | -           | -          |
| 64.00    | -           | -          |
| 51.00    | -           | -          |
| 46.00    | -           | -          |
| 72.45    | -           | -          |
| 4.99     | -           | -          |
| 4.99     | -           | -          |
| 38.08    | -           | -          |
| 38.03    | -           | -          |
| 149.13   | -           | -          |
| 38.03    | -           | -          |
| 4.99     | -           | -          |
| 15.00    | -           | -          |
| 67.58    | -           | -          |
| 295.52   | -           | -          |
| 30.51    | -           | -          |
| 51.10    | -           | -          |
| 16.51    | -           | -          |
| -        | -           | 172.48     |
| 40.00    | -           | -          |
| 4.99     | -           | -          |
| 38.03    | -           | -          |
| -        | -           | 210.00     |
| -        | -           | 22.62      |
| -        | -           | 68.71      |

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|---------------------------|------------------|-------------------------------------|---------------------|--------|
| Day of the Week           | Transaction Date | Vendor                              | Location            | Amount |
| Friday                    | 10/19/12         | Prairie Meadows Race                | Altoona, IA         | 221.76 |
| Friday                    | 10/19/12         | Iowa Geat Lakes Area C O            | Arnolds Park, IA    | 170.00 |
| Friday                    | 10/19/12         | Caseys Gen Store                    | Bondurant, IA       | 34.01  |
| Monday                    | 10/22/12         | DirecTV Service 800-347-3288        | CA                  | 72.35  |
| Wednesday                 | 10/24/12         | OnStar 888-4ONSTAR                  | MI                  | 38.08  |
| Tuesday                   | 10/30/12         | Amazon Mktplace Pmts                | Amazon. com         | 46.91  |
| Thursday                  | 11/01/12         | TJ Maxx                             | WDM, IA             | 60.40  |
| Friday                    | 11/02/12         | Satellite Services LLC 877-574-3834 | AZ                  | 4.99   |
| Friday                    | 11/02/12         | Caseys General Store                | Bondurant, IA       | 52.50  |
| Saturday                  | 11/03/12         | Holiday Inn and Suites              | West Des Moines, IA | 122.08 |
| Thursday                  | 11/22/12         | DirecTV Service 800-347-3288        | CA                  | 72.35  |
| Friday                    | 11/23/12         | Walmart                             | Cedar Rapids, IA    | 67.45  |
| Saturday                  | 11/24/12         | Walmart                             | Waterloo, IA        | 143.81 |
| Sunday                    | 11/25/12         | OnStar 888-4ONSTAR                  | MI                  | 38.08  |
| Friday                    | 11/30/12         | Totara Petroleum                    | Marshalltown, IA    | 60.00  |
| Saturday                  | 12/01/12         | Fareway Stores                      | Vinton, IA          | 65.08  |
| Sunday                    | 12/02/12         | Satellite Services LLC 877-574-3834 | AZ                  | 4.99   |
| Tuesday                   | 12/04/12         | I Wireless                          | Vinton, IA          | 502.53 |
| Thursday                  | 12/06/12         | Wm Schoppy, Inc.                    | schoppy.com NJ      | 16.15  |
| Thursday                  | 12/06/12         | Teamfanshop.com 866-687-3305        | FL                  | 9.95   |
| Wednesday                 | 12/12/12         | Chili's - Cedar Rapids              | Cedar Rapids, IA    | 50.96  |
| Friday                    | 12/14/12         | Target.com                          | MN                  | 34.66  |
| Sunday                    | 12/16/12         | Johns Qwik Stop                     | Vinton, IA          | 53.06  |
| Monday                    | 12/17/12         | Movies and More                     | Vinton, IA          | 52.65  |
| Tuesday                   | 12/18/12         | Fareway Stores                      | Vinton, IA          | 90.17  |
| Saturday                  | 12/22/12         | DirecTV Service 800-347-3288        | CA                  | 76.58  |
| Sunday                    | 12/23/12         | Target                              | Cedar Rapids, IA    | 196.58 |
| Wednesday                 | 12/26/12         | OnStar 888-4ONSTAR                  | MI                  | 38.08  |
| Tuesday                   | 01/01/13         | Walmart                             | Cedar Rapids, IA    | (6.92) |

| Improper | Unsupported | Reasonable |
|----------|-------------|------------|
| -        | -           | 221.76     |
| -        | -           | 170.00     |
| 34.01    | -           | -          |
| 72.35    | -           | -          |
| 38.08    | -           | -          |
| 46.91    | -           | -          |
| 60.40    | -           | -          |
| 4.99     | -           | -          |
| 52.50    | -           | -          |
| -        | -           | 122.08     |
| 72.35    | -           | -          |
| -        | 67.45       | -          |
| 143.81   | -           | -          |
| 38.08    | -           | -          |
| 60.00    | -           | -          |
| 65.08    | -           | -          |
| 4.99     | -           | -          |
| 502.53   | -           | -          |
| -        | 16.15       | -          |
| 9.95     | -           | -          |
| -        | -           | 50.96      |
| 34.66    | -           | -          |
| 53.06    | -           | -          |
| 52.65    | -           | -          |
| 90.17    | -           | -          |
| 76.58    | -           | -          |
| 196.58   | -           | -          |
| 38.08    | -           | -          |
| (6.92)   | -           | -          |

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|---------------------------|------------------|--------------------------------------|------------------|---------------------|
| Day of the Week           | Transaction Date | Vendor                               | Location         | Amount              |
| Wednesday                 | 01/02/13         | Satellite Services LLC 877-574-3834  | AZ               | 4.99                |
| Thursday                  | 01/10/13         | Johns Qwik Stop-                     | Vinton, IA       | 39.50               |
| Monday                    | 01/14/13         | Sushi House                          | Cedar Rapids, IA | 11.31               |
| Tuesday                   | 01/15/13         | Cedar Rapids Metro Economic Alliance | Cedar Rapids, IA | 40.00               |
| Saturday                  | 02/02/13         | Satellite Services LLC 877-574-3834  | AZ               | 4.99                |
| Wednesday                 | 02/13/13         | Walmart                              | Cedar Rapids, IA | 145.96              |
| Wednesday                 | 02/13/13         | Ryans #2195 Q82                      | Cedar Rapids, IA | 46.26               |
| Thursday                  | 02/14/13         | DirecTV Service 800-347-3288         | CA               | 72.35               |
| Thursday                  | 02/14/13         | Alliant Energy                       | WI               | 604.50              |
| Friday                    | 02/15/13         | OnStar 888-4ONSTAR                   | MI               | 38.27               |
| Sunday                    | 02/17/13         | Lucky Buffet                         | Independence, IA | 31.87               |
| Sunday                    | 02/17/13         | Johns Qwik Stop                      | Vinton, IA       | 40.00               |
| Monday                    | 02/18/13         | Caseys General Store                 | Belle Plaine     | 40.00               |
| Friday                    | 02/22/13         | DirecTV Service 800-347-3288         | CA               | 75.98               |
| Tuesday                   | 02/26/13         | OnStar 888-4ONSTAR                   | MI               | 38.27               |
| Wednesday                 | 02/27/13         | I Wireless                           | Vinton, IA       | 305.18              |
| Saturday                  | 03/02/13         | Satellite Services LLC 877-574-3834  | AZ               | 4.99                |
| Saturday                  | 03/09/13         | Ryans #2195 Q82                      | Cedar Rapids, IA | 73.71               |
| Monday                    | 03/11/13         | Johns Qwik Stop                      | Vinton, IA       | 50.00               |
| Wednesday                 | 03/13/13         | Caseys General Store                 | Bondurant, IA    | 50.03               |
| Friday                    | 03/22/13         | DirecTV Service 800-347-3288         | CA               | 75.98               |
| Sunday                    | 03/24/13         | OnStar 888-4ONSTAR                   | MI               | 38.27               |
| Tuesday                   | 04/02/13         | Satellite Services LLC 877-574-3834  | AZ               | 4.99                |
| Total                     |                  |                                      |                  | <u>\$ 26,832.77</u> |



| Improper  | Unsupported | Reasonable |
|-----------|-------------|------------|
| 4.99      | -           | -          |
| 39.50     | -           | -          |
| -         | -           | 11.31      |
| -         | -           | 40.00      |
| 4.99      | -           | -          |
| 145.96    | -           | -          |
| 46.26     | -           | -          |
| 72.35     | -           | -          |
| 604.50    | -           | -          |
| 38.27     | -           | -          |
| 31.87     | -           | -          |
| 40.00     | -           | -          |
| 40.00     | -           | -          |
| 75.98     | -           | -          |
| 38.27     | -           | -          |
| 305.18    | -           | -          |
| 4.99      | -           | -          |
| 73.71     | -           | -          |
| 50.00     | -           | -          |
| 50.03     | -           | -          |
| 75.98     | -           | -          |
| 38.27     | -           | -          |
| 4.99      | -           | -          |
| 17,435.51 | 2,188.55    | 7,208.71   |

**Exhibit C**

Report on Special Investigation of the  
Benton Development Group

Credit Card Payments  
For the period January 1, 2009 through August 31, 2014

**Per Check/Deposit Slip Image**

| <b>Check Date</b> | <b>Check Number</b> | <b>Memo</b>                                      | <b>Amount</b> |
|-------------------|---------------------|--|---------------|
| 01/06/09          | 5510                | travel (reimbursement to follow)                 | \$ 1,156.78   |
| 02/23/09          | 5530                | travel (RTF)                                     | 914.13        |
| 04/24/09          | 5554                | travel (RTF) Acct# XXXX XXXXX XXXX XXXX          | 1,054.48      |
| 05/21/09          | 5566                | travel (reimbursement to follow)                 | 1,452.32      |
| ^ 07/10/09        | 5576                | travel   | 1,882.52      |
| 09/17/09          | 5604                | travel (reimbursement to follow) [sic]           | 935.69        |
| 12/02/09          | 5634                | travel   | 132.14        |
| 02/03/10          | 5660                | travel (RTF)                                     | 1,848.02      |
| 05/19/10          | 5699                | travel (RTF)                                     | 1,030.00      |
| 08/18/10          | 5722                | travel Acct# XXXX XXXXX XXXX XXXX                | 1,180.05      |
| 10/18/10          | 5753                | meeting expenses                                 | 943.27        |
| 01/17/11          | 5775                | travel   | 1,235.50      |
| 04/08/11          | 5807                | Travel 289.24/mtg exp 79 / misc maint 45.76      | 414.00        |
| 04/28/11          | 5822                | misc -(RTF) Acct# XXXX XXXXX XXXX XXXX           | 876.37        |
| 06/03/11          | 5838                | misc maintenace [sic] Acct# XXXX XXXXX XXXX XXXX | 9.95          |
| 07/20/11          | 5858                | meeting expense (RTF)                            | 434.32        |
| 08/30/11          | 5872                | travel (RTF)                                     | 625.52        |
| 10/06/11          | 5885                | meeting expense                                  | 1,235.33      |
| 12/01/11          | 5901                | meeting expense                                  | 845.87        |
| 02/02/12          | 5925                | meeting expense                                  | 532.07        |
| 03/06/12          | 5933                | travel   | 319.81        |
| 03/19/12          | 5941                | travel   | 31.98         |
| 04/10/12          | 5953                | dues/subscriptions                               | 84.39         |
| 05/30/12          | 5967                | meeting expense                                  | 1,517.25      |

Report on Special Investigation of the  
Benton Development Group

Credit Card Payments  
For the period January 1, 2009 through August 31, 2014

**Per Check/Deposit Slip Image**

| <b>Check Date</b> | <b>Check Number</b> | <b>Memo</b>           | <b>Amount</b>       |
|-------------------|---------------------|-----------------------|---------------------|
| 07/23/12          | 5983                | meeting expense       | 297.77              |
| 08/08/12          | 5993                | travel                | 1,724.62            |
| 09/24/12          | 6009                | travel                | 273.25              |
| 11/20/12          | 6026                | meeting expense (RTF) | 1,625.79            |
| 01/18/13          | 6050                | meeting expense       | 1,842.92            |
| 04/22/13          | 6082                | travel expense        | 600.00              |
| 07/09/13          | 6088                | meeting expense       | 1,429.69            |
| 08/13/13          | 6099                | misc (monthly fee)    | 80.00               |
| Total             |                     |                       | <u>\$ 28,565.80</u> |

<sup>^</sup> Check did not include a date, but check number 5576 cleared BDG's bank account on July 10, 2009.

Note: Auditor's notations are in italics and the credit card account number was redacted from the memo's.

**Exhibit D**

Report on Special Investigation of the  
Benton Development Group

Payroll Checks Issued to Ranae Becker  
For the period January 1, 2009 through August 31, 2014

| Per Check Image           |              |  |             |
|---------------------------|--------------|--|-------------|
| Date                      | Check Number | Memo   | Amount      |
| 01/06/09                  | 5509         | ED salary: 1362.81 gross/104.25 FICA/50 Fed/ 50.56 St. | \$ 1,158.00 |
| 01/22/09                  | 5520         | ED salary: 1362.81 gross/104.25 FICA/50 Fed/ 50.56 St. | 1,158.00    |
| 02/23/09                  | 5531         | ED salary: 1362.81 gross/104.25 FICA/50 Fed/ 50.56 St. | 1,158.00    |
| 03/05/09                  | 5534         | ED salary: 1362.81 gross/104.25 FICA/50 Fed/ 50.56 St. | 1,158.00    |
| 03/20/09                  | 5536         | ED salary: 1362.81 gross/104.25 FICA/50 Fed/ 50.56 St. | 1,158.00    |
| 04/07/09                  | 5546         | ED salary: 1362.81 gross/104.25 FICA/50 Fed/ 50.56 St. | 1,158.00    |
| 04/24/09                  | 5559         | ED salary: 1362.81 gross/104.25 FICA/50 Fed/ 50.56 St. | 1,158.00    |
| 05/02/09                  | 5561         | ED salary: 1362.81 gross/104.25 FICA/50 Fed/ 50.56 St. | 1,158.00    |
| 05/20/09                  | 5564         | ED salary: 1362.81 gross/104.25 FICA/50 Fed/ 50.56 St. | 1,158.00    |
| 06/01/09                  | 5568         | ED salary: 1362.81 gross/104.25 FICA/50 Fed/ 50.56 St. | 1,158.00    |
| 06/15/09                  | 5570         | ED salary: 1362.81 gross/104.25 FICA/50 Fed/ 50.56 St. | 1,158.00    |
| 07/07/09                  | 5573         | ED salary: 1396.88 gross/106.86 FICA/55.02 Fed/ 55 St. | 1,180.00    |
| Subtotal fiscal year 2009 |              |  | 13,918.00   |
| 07/10/09                  | 5574         | ED salary: 1396.88 gross/106.86 FICA/55.02 Fed/ 55 St. | 1,180.00 ^  |
| 07/29/09                  | 5592         | ED salary: 1396.88 gross/106.86 FICA/55.02 Fed/ 55 St. | 1,180.00 ^  |
| 08/12/09                  | 5599         | ED salary: 1396.88 gross/106.86 FICA/55.02 Fed/ 55 St. | 1,180.00 ^  |
| 09/01/09                  | 5602         | ED salary: 1396.88 gross/106.86 FICA/55.02 Fed/ 55 St. | 1,180.00    |
| 09/17/09                  | 5605         | ED salary: 1396.88 gross/106.86 FICA/55.02 Fed/ 55 St. | 1,180.00    |
| 10/09/09                  | 5614         | ED salary: 1396.88 gross/106.86 FICA/55.02 Fed/ 55 St. | 1,180.00    |
| 10/26/09                  | 5621         | ED salary: 1396.88 gross/106.86 FICA/55.02 Fed/ 55 St. | 1,180.00    |
| 11/09/09                  | 5628         | ED salary: 1396.88 gross/106.86 FICA/55.02 Fed/ 55 St. | 1,180.00    |
| 11/24/09                  | 5631         | ED salary: 1396.88 gross/106.86 FICA/55.02 Fed/ 55 St. | 1,180.00    |
| 12/08/09                  | 5639         | ED salary: 1396.88 gross/106.86 FICA/55.02 Fed/ 55 St. | 1,180.00    |
| 12/15/09                  | 5641         | ED salary: 1396.88 gross/106.86 FICA/55.02 Fed/ 55 St. | 1,180.00    |
| 01/06/10                  | 5645         | ED salary: 1396.88 gross/106.86 FICA/55.02 Fed/ 55 St. | 1,180.00    |
| 01/21/10                  | 5649         | ED salary: 1396.88 gross/106.86 FICA/55.02 Fed/ 55 St. | 1,180.00    |
| 02/01/10                  | 5659         | ED salary: 1396.88 gross/106.86 FICA/55.02 Fed/ 55 St. | 1,180.00    |
| 02/24/10                  | 5667         | ED salary: 1396.88 gross/106.86 FICA/ 55 St/55.02 Fed  | 1,180.00    |

Report on Special Investigation of the  
Benton Development Group

Payroll Checks Issued to Ranae Becker  
For the period January 1, 2009 through August 31, 2014

| Per Check Image           |              |   |            |
|---------------------------|--------------|---|------------|
| Date                      | Check Number | Memo  | Amount     |
| 03/06/10                  | 5669         | ED salary: 1396.88 gross/106.86 FICA/ 55 St/55.02 Fed                     | 1,180.00   |
| 03/22/10                  | 5670         | ED salary: 1396.88 gross/106.86 FICA/ 55 St/55.02 Fed                     | 1,180.00   |
| 04/09/10                  | 5676         | ED salary: 1396.88 gross/106.86 FICA/ 55 St/55.02 Fed                     | 1,180.00   |
| 04/26/10                  | 5686         | ED salary: 1396.88 gross/106.86 FICA/ 55 St/55.02 Fed                     | 1,180.00   |
| 05/10/10                  | 5694         | ED salary: 1396.88 gross/106.86 FICA/ 55 St/55.02 Fed                     | 1,180.00   |
| 05/29/10                  | 5698         | ED salary: 1396.88 gross/106.86 FICA/ 55 St/55.02 Fed                     | 1,180.00   |
| 06/01/15                  | 5702         | ED salary: 1396.88 gross/106.86 FICA/ 55 St/55.02 Fed                     | 1,180.00   |
| 06/15/10                  | 5703         | ED salary: 1396.88 gross/106.86 FICA/ 55 St/55.02 Fed                     | 1,180.00   |
| 06/25/10                  | 5707         | ED salary: 1396.88 gross/106.86 FICA/55.02 Fed/ 55 St.                    | 1,180.00 ^ |
| Subtotal fiscal year 2010 |              |   | 28,320.00  |
| 07/14/10                  | 5713         | ED salary: 1396.88 gross/106.86 FICA/55.02 Fed/ 55 St.                    | 1,180.00 ^ |
| 07/26/10                  | 5716         | ED salary: 1396.88 gross/106.86 FICA/ 55 St/55.02 Fed                     | 1,180.00 ^ |
| 08/10/10                  | 5721         | ED salary: 1396.88 gross/106.86 FICA/ 55 St/55.02 Fed                     | 1,180.00 ^ |
| 08/26/10                  | 5726         | ED salary: 1396.88 gross/106.86 FICA/ 55 St/55.02 Fed                     | 1,180.00 ^ |
| 09/08/10                  | 5737         | ED salary: 1396.88 gross/106.86 FICA/ 55 St/55.02 Fed                     | 1,180.00 ^ |
| 09/24/10                  | 5740         | ED salary: 1396.88 gross/106.86 FICA/ 55 St/55.02 Fed                     | 1,180.00 ^ |
| 10/06/10                  | 5743         | ED salary: 1396.88 gross/106.86 FICA/55.02 Fed/ 55 St.                    | 1,180.00 ^ |
| 10/25/10                  | 5756         | ED salary: 1396.88 gross/106.86 FICA/ 55 St/55.02 Fed                     | 1,180.00 ^ |
| 11/03/10                  | 5757         | ED salary: 1396.88 gross/106.86 FICA/ 55 St/55.02 Fed                     | 1,180.00 ^ |
| 11/27/10                  | 5762         | ED salary: 1396.88 gross/106.86 FICA/55.02 Fed/ 55 St.                    | 1,180.00 ^ |
| 12/13/10                  | 5769         | ED salary: 1396.88 gross/106.86 FICA/55.02 Fed/ 55 St.                    | 1,180.00 ^ |
| 01/01/11                  | 5772         | ED salary: 1396.88 gross/78.92 FICA/55.02 Fed/ 55.94 St.                  | 1,207.00   |
| 01/11/11                  | 5774         | ED salary: 1396.88 gross/78.92 FICA/55.02 Fed/ 55.94 State                | 1,207.00 ^ |
| 01/27/11                  | 5781         | ED salary: 1396.88 gross/78.92 FICA/55.02 Fed/ 55.94 St.                  | 1,207.00 ^ |
| 02/08/11                  | 5788         | ED salary: 1396.88 gross/78.92 FICA/55.94 St./55.02 Fed                   | 1,207.00 ^ |
| 03/01/11                  | 5793         | ED salary: 1396.88 gross/78.92 FICA/55.02 Fed/55.94 St.                   | 1,207.00   |
| 03/10/11                  | 5796         | ED salary: 1396.88 gross/78.92 FICA/55.02 Fed/55.94 St.                   | 1,207.00 ^ |
| 04/08/11                  | 5814         | ED salary: 1433.33 gross/80.98 FICA/57.33 Fed/65.02 St 307.50 garnishment | 922.50     |

**Exhibit D**

Report on Special Investigation of the  
Benton Development Group

Payroll Checks Issued to Ranae Becker  
For the period January 1, 2009 through August 31, 2014

| Per Check Image           |              |   |  |  |  |            |
|---------------------------|--------------|---|--|--|--|------------|
| Date                      | Check Number | Memo  |  |  |  | Amount     |
| 04/15/11                  | 5820         | ED salary: 1433.33 gross/80.98 FICA/57.33 Fed/65.02 St 307.50 garnishment |  |  |  | 922.50 ^   |
| 05/03/11                  | 5828         | ED salary: 1433.33 gross/80.98 FICA/57.33 Fed/65.02 St 307.50 garnishment |  |  |  | 922.50 ^   |
| 05/17/11                  | 5833         | ED salary: 1433.33 gross/80.98 FICA/57.33 Fed/65.02 St 307.50 garnishment |  |  |  | 922.50 ^   |
| 6/4/2011                  | 5836         | ED salary: 1433.33 gross/80.98 FICA/57.33 Fed/65.02 St 307.50 garnishment |  |  |  | 922.50     |
| 06/14/11                  | 5839         | ED salary: 1433.33 gross/80.98 FICA/57.33 Fed/65.02 St 307.50 garnishment |  |  |  | 922.50 ^   |
| 06/30/11                  | 5846         | ED salary: 1433.33 gross/80.98 FICA/57.33 Fed/65.02 St 307.50 garnishment |  |  |  | 922.50     |
| Subtotal fiscal year 2011 |              |   |  |  |  | 26,679.50  |
|                           |              |   |  |  |  |            |
| 07/20/11                  | 5850         | ED salary: 1433.33 gross/80.58 FICA/57.33 Fed/65.02 St.                   |  |  |  | 1,230.00   |
| 07/29/11                  | 5861         | ED salary: 1433.33 gross/80.98 FICA/57.33 Fed/65.02 St.                   |  |  |  | 1,230.00 ^ |
| 08/02/11                  | 5862         | ED salary: 1433.33 gross/80.98 FICA/57.33 Fed/65.02 St.                   |  |  |  | 1,230.00 ^ |
| 08/31/11                  | 5868         | ED salary: 1433.33 gross/80.98 FICA/57.33 Fed/65.02 St.                   |  |  |  | 1,230.00   |
| 09/12/11                  | 5877         | ED salary: 1433.33 gross/80.98 FICA/57.33 Fed/65.02 St.                   |  |  |  | 1,230.00 ^ |
| 09/23/11                  | 5880         | ED salary: 1433.33 gross/80.98 FICA/57.33 Fed/65.02 St.                   |  |  |  | 1,230.00 ^ |
| 10/06/11                  | 5886         | ED salary: 1433.33 gross/80.98 FICA/57.33 Fed/65.02 St.                   |  |  |  | 1,230.00 ^ |
| 10/27/11                  | 5893         | ED salary: 1433.33 gross/80.98 FICA/57.33 Fed/65.02 St.                   |  |  |  | 1,230.00 ^ |
| 11/02/11                  | 5895         | ED salary: 1433.33 gross/80.98 FICA/57.33 Fed/65.02 St.                   |  |  |  | 1,230.00 ^ |
| 12/03/11                  | 5903         | ED salary: 1433.33 gross/80.98 FICA/57.33 Fed/65.02 St.                   |  |  |  | 1,230.00   |
| 12/15/11                  | 5904         | ED salary: 1433.33 gross/80.98 FICA/57.33 Fed/65.02 St.                   |  |  |  | 1,230.00   |
| 01/03/12                  | 5912         | ED salary: 1433.33 gross/80.98 FICA/57.33 Fed/65.02 St.                   |  |  |  | 1,230.00   |
| 01/06/12                  | 5913         | ED salary: 1433.33 gross/80.98 FICA/57.33 Fed/65.02 St.                   |  |  |  | 1,230.00 ^ |
| 01/24/12                  | 5922         | ED salary: 1433.33 gross/80.98 FICA/57.33 Fed/65.02 St.                   |  |  |  | 1,230.00 ^ |
| 02/02/12                  | 5926         | ED salary: 1433.33 gross/80.98 FICA/57.33 Fed/65.02 St.                   |  |  |  | 1,230.00 ^ |
| 02/17/12                  | 5929         | ED salary: 1433.33 gross/80.98 FICA/57.33 Fed/65.02 St.                   |  |  |  | 1,230.00 ^ |
| 03/05/12                  | 5930         | ED salary: 1433.33 gross/80.98 FICA/57.33 Fed/65.02 St.                   |  |  |  | 1,230.00 ^ |
| 03/21/12                  | 5946         | ED salary: 1433.33 gross/80.98 FICA/57.33 Fed/65.02 St.                   |  |  |  | 1,230.00 ^ |
| 04/02/12                  | 5947         | ED salary: 1433.33 gross/80.98 FICA/57.33 Fed/65.02 St.                   |  |  |  | 1,230.00   |
| 04/19/12                  | 5958         | ED salary: 1433.33 gross/80.98 FICA/57.33 Fed/65.02 St.                   |  |  |  | 1,230.00   |
| 05/01/12                  | 5961         | ED salary: 1433.33 gross/80.98 FICA/57.33 Fed/65.02 St.                   |  |  |  | 1,230.00   |

Report on Special Investigation of the  
Benton Development Group

Payroll Checks Issued to Ranae Becker  
For the period January 1, 2009 through August 31, 2014

| Per Check Image           |              |  |            |
|---------------------------|--------------|--|------------|
| Date                      | Check Number | Memo   | Amount     |
| 05/14/12                  | 5964         | ED salary: 1433.33 gross/80.98 FICA/57.33 Fed/65.02 St.  | 1,230.00 ^ |
| 05/30/12                  | 5971         | ED salary: 1433.33 gross/80.98 FICA/57.33 Fed/65.02 St.  | 1,230.00 ^ |
| 06/07/12                  | 5972         | ED salary: 1433.33 gross/80.98 FICA/57.33 Fed/65.02 St.  | 1,230.00   |
| 06/26/12                  | 5976         | ED salary: 1433.33 gross/80.98 FICA/57.33 Fed/65.02 St.  | 1,230.00 ^ |
| Subtotal fiscal year 2012 |              |  | 30,750.00  |
| 07/10/12                  | 5979         | ED salary: 1433.33 gross/80.98 FICA/57.33 Fed/65.02 St.  | 1,230.00 ^ |
| 07/23/12                  | 5980         | ED salary: 1433.33 gross/80.98 FICA/57.33 Fed/65.02 St.  | 1,230.00 ^ |
| 08/01/12                  | 5989         | ED salary: 1433.33 gross/80.98 FICA/57.33 Fed/65.02 St.  | 1,230.00 ^ |
| 08/08/12                  | 5994         | ED salary: 1433.33 gross/80.98 FICA/57.33 Fed/65.02 St.  | 1,230.00 ^ |
| 08/13/12                  | 5997         | ED salary: 1433.33 gross/80.98 FICA/57.33 Fed/65.02 St.  | 1,230.00 ^ |
| 08/29/12                  | 6000         | ED salary: 1433.33 gross/80.98 FICA/57.33 Fed/65.02 St.  | 1,230.00 ^ |
| 09/06/12                  | 6001         | ED salary: 1433.33 gross/80.98 FICA/57.33 Fed/65.02 St.  | 1,230.00 ^ |
| 09/13/12                  | 6003         | ED salary: 1433.33 gross/80.98 FICA/57.33 Fed/65.02 St.  | 1,230.00   |
| 10/02/12                  | 6013         | ED salary: 1433.33 gross/80.98 FICA/57.33 Fed/65.02 St.  | 1,230.00   |
| 10/15/12                  | 6014         | ED salary: 1433.33 gross/80.98 FICA/57.33 Fed/65.02 St.  | 1,230.00   |
| 10/22/12                  | 6020         | ED salary: 1433.33 gross/80.98 FICA/57.33 Fed/65.02 St.  | 1,230.00 ^ |
| 11/06/12                  | 6023         | ED salary: 1433.33 gross/80.98 FICA/57.33 Fed/65.02 St.  | 1,230.00   |
| 11/13/12                  | 6024         | ED salary: 1433.33 gross/80.98 FICA/57.33 Fed/65.02 St.  | 1,230.00 ^ |
| 12/01/12                  | 6031         | ED salary: 1433.33 gross/80.98 FICA/57.33 Fed/65.02 St.  | 1,230.00 ^ |
| 12/06/12                  | 6032         | ED salary: 1433.33 gross/80.98 FICA/57.33 Fed/65.02 St.  | 1,230.00   |
| 12/30/12                  | 6041         | ED salary: 1433.33 gross/80.98 FICA/57.33 Fed/65.02 St.  | 1,230.00 ^ |
| 01/08/13                  | 6044         | ED salary: 1433.33 gross/109.65 FICA/57.33 Fed/65.35 St. | 1,201.00   |
| 01/18/13                  | 6058         | ED salary: 1433.33 gross/109.65 FICA/57.33 Fed/65.35 St. | 1,201.00   |
| 02/06/13                  | 6060         | ED salary: 1433.33 gross/109.65 FICA/57.33 Fed/65.35 St. | 1,201.00   |
| 02/21/13                  | 6064         | ED salary: 1433.33 gross/109.65 FICA/57.33 Fed/65.35 St. | 1,201.00   |
| 03/06/13                  | 6067         | ED salary: 1433.33 gross/109.65 FICA/57.33 Fed/65.35 St. | 1,201.00   |
| 03/15/13                  | 6071         | ED salary: 1433.33 gross/109.65 FICA/57.33 Fed/65.35 St. | 1,201.00   |

**Exhibit D**

Report on Special Investigation of the  
Benton Development Group

Payroll Checks Issued to Ranae Becker  
For the period January 1, 2009 through August 31, 2014

| Per Check Image           |              |   |               |
|---------------------------|--------------|---|---------------|
| Date                      | Check Number | Memo  | Amount        |
| 04/10/13                  | 6078         | ED salary: 1433.33 gross/109.65 FICA/57.33 Fed/65.35 St.          | 1,201.00      |
| Subtotal fiscal year 2013 |              |   | 28,087.00     |
| 07/09/13                  | 6092         | July salary: 180 gross/13.77 FICA/0 St/0Fed                       | 166.23        |
| 07/26/13                  | 6094         | Mo salary: 180 gross/13.77 FICA/0 St/0Fed                         | 166.23        |
| 08/18/13                  | 6098         | 180 gross/13.77 FICA/0 St/0Fed                                    | 166.23        |
| 09/06/13                  | 6106         | 180 gross/13.77 FICA/0 St/0Fed                                    | 166.23        |
| 10/11/13                  | 6113         | salary 360 gross/27.54 FICA/5.46 St/11 Fed                        | 316.00        |
| 10/16/13                  | 6114         | ED salary 360 gross/27.54 FICA/5.46 St/11 Fed                     | 316.00        |
| 11/08/13                  | 6115         | salary 360 gross/27.54 FICA/5.46 St/11 Fed                        | 316.00        |
| 12/02/13                  | 6118         | salary 360 gross/27.54 FICA/5.46 St/11 Fed                        | 316.00        |
| 01/15/14                  | 6126         | Jan salary: 180 gross/13.77 FICA/0 St/0Fed                        | 166.23        |
| 02/14/14                  | 6128         | wage 300 gross/20.60 Fed/18.60 Social Sec/4.35 Medicare/3 St      | 253.45        |
| 02/28/14                  | 6129         | wage 300 gross/20.60 Fed/18.60 Social Sec/4.35 Medicare/3 St      | 253.45        |
| 03/14/14                  | 6135         | March 15 -300 gross/20.60 Fed/18.60 Social Sec/4.35 Medicare/3 St | 253.45        |
| 03/26/14                  | 6136         | wage 300 gross/20.60 Fed/18.60 Social Sec/4.35 Medicare/3 St      | 253.45        |
| 04/11/14                  | 6143         | wage: 300 gross/20.60 Fed/18.60 Social Sec/4.35 Medicare/3 St     | 253.45        |
| 04/25/14                  | 6147         | None  | 253.45        |
| 05/09/14                  | 6148         | wage 300 gross/20.60 Fed/3 St/18.60 SS/4.35 Medicare              | 253.45        |
| 05/30/14                  | 6150         | wage 300 gross/20.60 Fed/18.60 Social Sec/4.35 Medicare/3 St      | 253.45        |
| 06/14/14                  | 6154         | wage 300 gross 20.60 Fed, 18.60 SS 4.35 Med, 3.00 St ED wages     | 253.45        |
| 06/30/14                  | 6162         | 10 hrs \$15/hr 300 gross, 20.60 Fed, 18.60 SS, 4.35 Med, 3.00 St  | 253.45        |
| Subtotal fiscal year 2014 |              |   | 4,629.65      |
| Total                     |              |   | \$ 132,384.15 |

# - Check did not include issue date. Date shown is the date the check cleared the bank.

^ - Check issued to Ms. Becker prior to the end of the pay period.



**Benton Development Group**

Report on Special Investigation of the  
Benton Development Group

Selected Payments to Vendors  
For the period January 1, 2009 through August 31, 2014

| Per Check/Deposit Slip Image |            |              |                           |
|------------------------------|------------|--------------|---------------------------|
|                              | Check Date | Check Number | Payee/Description         |
| Friday                       | 01/02/09   | 5508         | RJ Ender                  |
| Monday ^                     | 01/05/09   | 5643         | RJ Ender                  |
| Monday                       | 01/12/09   | 5516         | RJ Ender                  |
| Wednesday                    | 01/14/09   | 5517         | RJ Ender                  |
| Friday                       | 01/30/09   | 5521         | EJ Enders                 |
| Thursday                     | 02/12/09   | 5528         | RJ Enders                 |
| Tuesday                      | 02/17/09   | 5529         | RJ Enders                 |
| Wednesday                    | 03/18/09   | 5532         | RJ Enders                 |
| Tuesday                      | 03/24/09   | 5544         | Price Industrial Electric |
| Tuesday                      | 03/24/09   | 5540         | Monkeytown                |
| Wednesday                    | 04/01/09   | 5547         | RJ Enders                 |
| Tuesday                      | 04/21/09   | 5553         | Fareway                   |
| Friday                       | 04/24/09   | 5558         | Monkeytown                |
| Thursday                     | 05/14/09   | 5565         | RJ Ender                  |
| Monday                       | 06/22/09   | 5572         | River City Graphics       |
| Thursday                     | 07/09/09   | 5578         | Tharp Design              |
| Thursday                     | 07/09/09   | 5579         | Eastern Iowa Computer     |
| Thursday                     | 07/09/09   | 5585         | LaGrange's                |
| Tuesday                      | 07/21/09   | 5589         | RJ Ender                  |
| Monday                       | 07/27/09   | 5591         | RJ Ender                  |
| Saturday                     | 08/01/09   | 5593         | Youngville Café           |
| Friday                       | 08/21/09   | 5600         | Monkeytown                |
| Thursday                     | 09/17/09   | 5609         | Super Dollar              |
| Thursday                     | 09/17/09   | 5608         | Monkeytown                |
| Friday                       | 09/18/09   | 5610         | Fareway                   |
| Monday                       | 09/21/09   | 5611         | Pizza Ranch               |
| Tuesday                      | 09/22/09   | 5612         | John's                    |
| Tuesday                      | 10/20/09   | 5616         | RJ Enders                 |
| Wednesday                    | 10/21/09   | 5617         | TFI                       |
| Thursday                     | 10/22/09   | 5622         | Alliant                   |
| Wednesday                    | 10/28/09   | 5626         | Verocity                  |

| <b>Memo</b>                       | <b>Amount</b> | <b>Improper</b> | <b>Unsupported</b> |
|-----------------------------------|---------------|-----------------|--------------------|
| office supplies                   | \$ 32.10      | -               | 32.10              |
| office supplies                   | 69.55         | -               | 69.55              |
| office supplies                   | 58.85         | -               | 58.85              |
| office supplies                   | 20.33         | -               | 20.33              |
| office supplies                   | 19.26         | -               | 19.26              |
| office supplies                   | 48.15         | -               | 48.15              |
| office supplies                   | 20.33         | -               | 20.33              |
| office supplies                   | 20.33         | -               | 20.33              |
| misc maintenance (Internet lines) | 200.18        | -               | 200.18             |
| office supplies (#2092)           | 72.74         | -               | 72.74              |
| misc maintenance                  | 80.25         | -               | 80.25              |
| meeting expense (foundation)      | 62.41         | -               | 62.41              |
| office supplies                   | 101.59        | -               | 101.59             |
| office supplies                   | 48.15         | -               | 48.15              |
| advertising                       | 393.75        | -               | 393.75             |
| misc maintenance                  | 50.00         | 50.00           | -                  |
| internet                          | 44.85         | -               | 44.85              |
| misc maintenance                  | 64.19         | -               | 64.19              |
| office supplies                   | 176.55        | -               | 176.55             |
| office supplies                   | 36.38         | -               | 36.38              |
| meeting expense                   | 19.00         | -               | 19.00              |
| office supplies                   | 186.07        | -               | 186.07             |
| mtg expense                       | 22.26         | -               | 22.26              |
| office supplies                   | 273.03        | -               | 273.03             |
| mtg expense (RTF)                 | 67.64         | -               | 67.64              |
| mtg expense                       | 69.24         | -               | 69.24              |
| mtg expense (RTF)                 | 21.35         | -               | 21.35              |
| office supplies                   | 68.48         | -               | 68.48              |
| mtg expense                       | 240.00        | -               | 240.00             |
| mtg expense                       | 60.00         | 60.00           | -                  |
| advertising                       | 42.74         | -               | 42.74              |

Report on Special Investigation of the  
Benton Development Group

Selected Payments to Vendors  
For the period January 1, 2009 through August 31, 2014

|           | Per Check/Deposit Slip Image |              |                                |
|-----------|------------------------------|--------------|--------------------------------|
|           | Check Date                   | Check Number | Payee/Description              |
| Tuesday   | 11/10/09                     | 5629         | Fareway                        |
| Monday    | 11/16/09                     | 5630         | River City Graphics Solutions  |
| Tuesday   | 12/08/09                     | 5637         | Eastern Iowa Computer Services |
| Tuesday   | 01/26/10                     | 5650         | RJ Enders                      |
| Thursday  | 01/28/10                     | 5651         | Monkeytown                     |
| Wednesday | 02/17/10                     | 5666         | RJ Ender                       |
| Thursday  | 04/22/10                     | 5678         | Fifth Street Koffee Haus       |
| Friday    | 04/23/10                     | 5680         | Monkeytown                     |
| Friday    | 04/23/10                     | 5683         | EICS                           |
| Thursday  | 04/29/10                     | 5688         | Pizza Ranch                    |
| Monday    | 05/10/10                     | 5690         | Monkeytown                     |
| Wednesday | 05/26/10                     | 5700         | RJ Ender                       |
| Monday    | 07/19/10                     | 5714         | I Wireless                     |
| Monday    | 08/09/10                     | 5720         | RJ Ender                       |
| Wednesday | 08/18/10                     | 5723         | Monkeytown                     |
| Thursday  | 09/02/10                     | 5727         | Eastern Iowa Computers         |
| Tuesday   | 09/14/10                     | 5738         | RJ Ender                       |
| Tuesday   | 10/05/10                     | 5741         | EJ Ender                       |
| Monday    | 10/18/10                     | 5750         | Monkeytown                     |
| Monday    | 10/18/10                     | 5755         | Fareway                        |
| Wednesday | 11/24/10                     | 5763         | Monkeytown                     |
| Wednesday | 11/24/10                     | 5767         | Fareway                        |
| Tuesday   | 01/25/11                     | 5780         | LeGrange's                     |
| Sunday    | 02/27/11                     | 5786         | Monkeytown                     |
| Tuesday   | 03/15/11                     | 5802         | Fareway                        |
| Thursday  | 04/07/11                     | 5804         | Temptation Fine Chocolates     |
| Friday    | 04/08/11                     | 5812         | Monkeytown                     |
| Thursday  | 04/14/11                     | 5819         | The National Trust             |
| Thursday  | 04/28/11                     | 5823         | ICAD                           |
| Tuesday   | 05/03/11                     | 5829         | Fareway                        |
| Tuesday   | 06/07/11                     | 5842         | RJ Ender                       |

| <b>Memo</b>                                 | <b>Amount</b> | <b>Improper</b> | <b>Unsupported</b> |
|---|---------------|-----------------|--------------------|
| mtg expense                                 | 47.33         | -               | 47.33              |
| office supplies                             | 134.50        | -               | 134.50             |
| internet                                    | 89.70         | -               | 89.70              |
| office supplies                             | 48.15         | -               | 48.15              |
| office supplies                             | 342.08        | -               | 342.08             |
| office supplies                             | 42.80         | -               | 42.80              |
| meeting expense                             | 35.01         | -               | 35.01              |
| office supplies                             | 195.58        | -               | 195.58             |
| Internet                                    | 44.85         | -               | 44.85              |
| mtg expense                                 | 78.55         | -               | 78.55              |
| office supplies                             | 119.72        | -               | 119.72             |
| office supplies                             | 48.15         | -               | 48.15              |
| advertising (photo contest)                 | 5.82          | 5.82            | -                  |
| office supplies                             | 21.40         | -               | 21.40              |
| office supplies                             | 17.11         | -               | 17.11              |
| internet                                    | 29.90         | -               | 29.90              |
| office supplies                             | 100.58        | -               | 100.58             |
| office supplies                             | 105.93        | -               | 105.93             |
| office supplies                             | 119.59        | -               | 119.59             |
| meeting expense (foundation)                | 53.28         | -               | 53.28              |
| office supplies                             | 74.94         | -               | 74.94              |
| meeting expense                             | 62.24         | -               | 62.24              |
| office supplies                             | 32.08         | -               | 32.08              |
| office supplies                             | 137.26        | -               | 137.26             |
| meeting expense (foundation)                | 98.08         | -               | 98.08              |
| advertising (RTF)                           | 374.50        | -               | 374.50             |
| office supplies                             | 137.26        | -               | 137.26             |
| Grant #26561-8271636-9156 meeting exp (RTF) | 355.00        | -               | 355.00             |
| Main St Conf                                |               |                 |                    |
| office supplies                             | 545.00        | -               | 545.00             |
| meeting expense (foundation)                | 98.66         | -               | 98.66              |
| office supplies                             | 48.15         | -               | 48.15              |

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Report on Special Investigation of the  
Benton Development Group

Selected Payments to Vendors  
For the period January 1, 2009 through August 31, 2014

|           | Per Check/Deposit Slip Image |              |                   |
|-----------|------------------------------|--------------|-------------------|
|           | Check Date                   | Check Number | Payee/Description |
| Wednesday | 08/24/11                     | 5865         | Fareway           |
| Wednesday | 08/24/11                     | 5866         | John's Qwik Stop  |
| Thursday  | 10/13/11                     | 5889         | LaGrange's        |
| Tuesday   | 10/25/11                     | 5891         | Fareway           |
| Thursday  | 10/27/11                     | 5894         | Alco              |
| Saturday  | 11/26/11                     | 5900         | Fareway           |
| Thursday  | 01/26/12                     | 5924         | John's            |
| Tuesday   | 04/17/12                     | 5956         | John's Qwik Stop  |
| Thursday  | 05/31/12                     | 5973         | Fareway           |
| Friday    | 06/29/12                     | 5977         | Alco              |
| Friday    | 07/06/12                     | 5978         | Alco              |
| Monday    | 08/20/12                     | 5999         | LaGrange's        |
| Tuesday   | 11/20/12                     | 6025         | Alco              |
| Tuesday   | 01/15/13                     | 6049         | Fareway           |
| Thursday  | 02/21/13                     | 6065         | LaGrange's        |
| Wednesday | 05/22/13                     | 6084         | Fareway           |
| Tuesday   | 01/14/14                     | 6127         | JQS               |
| Wednesday | 02/26/14                     | 6130         | Fareway           |
| Total     | Total                        |              |                   |

^ - Check number 5643 was dated 01/05/09, but it cleared BDG's bank account on 01/08/10.

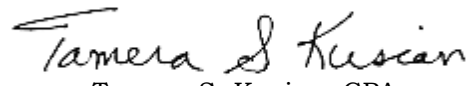
| <b>Memo</b>                      | <b>Amount</b>      | <b>Improper</b> | <b>Unsupported</b> |
|----------------------------------|--------------------|-----------------|--------------------|
| Mtg exp (RTF-foundation)         | 86.12              | -               | 86.12              |
| meeting expense-RTF (foundation) | 17.38              | -               | 17.38              |
| office supplies                  | 16.04              | -               | 16.04              |
| mtg expenses (BC Foundation)     | 80.17              | -               | 80.17              |
| office supplies                  | 190.93             | -               | 190.93             |
| mtg expense                      | 52.85              | -               | 52.85              |
| meeting expense                  | 15.01              | -               | 15.01              |
| mtg supplies                     | 17.87              | -               | 17.87              |
| meeting expense (RTF-Foundation) | 148.43             | -               | 148.43             |
| office supplies                  | 74.87              | -               | 74.87              |
| office supplies                  | 31.42              | -               | 31.42              |
| office supplies                  | 36.36              | -               | 36.36              |
| office supplies                  | 42.78              | -               | 42.78              |
| meeting expense                  | 141.74             | -               | 141.74             |
| office supplies                  | 41.71              | -               | 41.71              |
| mtg expense                      | 106.98             | -               | 106.98             |
| postage                          | 18.40              | 18.40           | -                  |
| meeting expense                  | 2.88               | -               | 2.88               |
|                                  | <u>\$ 7,454.89</u> | <u>134.22</u>   | <u>7,320.67</u>    |

Report on Special Investigation of the  
Benton Development Group

Staff

This special investigation was performed by:

Annette K. Campbell, CPA, Director  
Mark D. Newhall, Staff Auditor  
Sarah K. Nissen, Assistant Auditor

  
Tamera S. Kusian, CPA  
Deputy Auditor of State



## **Appendices**

**Benton Development Group**

Report on Special Investigation of the  
Benton Development Group

Copy of Convenience Store Receipt Found in the Trash

WELCOME  
8225633  
JOHNS QWIK STOP  
814 C AVE  
VINTON IA  
DATE 06/06/12 15:48  
PUMP # 04  
PRODUCT: PLUS 4100.240  
GALLONS: 19.436  
PRICE/G: \$ 3.319  
FUEL SALE \$ 64.51  
VISA  
XXXXXXXXXXXX9278  
Auth #: 004201  
Ref: 01855007  
Resp Code: 000  
Stan: 0523757389  
SITE ID: 8225633  
Earn rebates  
with BP Visa  
Take application  
and Apply Today  
THANK YOU  
HAVE A NICE DAY

Report on Special Investigation of the  
Benton Development Group

Copies of Selected Receipts Found in the Trash

SHELL , 57543992408  
12871 GORDON BLVD  
WOODBRIDGE , VA  
22192

06/08/2012 09:46:18 AM 91368709

XXXX XXXX XXXX 9278 VISA  
INVOICE 619058  
AUTH 003182

PUMP# 4  
REGULAR 13.156G  
PRICE/GAL 3.459  
FUEL TOTAL \$ 45.51

Subtotal = \$ 45.51  
Tax = \$ 0.00  
Total = \$ 45.51

CREDIT \$ 45.51

Save 10cents/gal instantly at Shell when  
you earn 100 points at Giant Food.

Pick up a brochure at your local Shell  
for more details.

Report on Special Investigation of the  
Benton Development Group

Copies of Selected Receipts Found in the Trash

**T.J. MAXX**

5252 Fairfield Shopping Center  
Virginia Beach, VA 23464  
757-467-0063

|                   |        |         |
|-------------------|--------|---------|
| 30 - DRESSES      | 509502 | 16.00 T |
| 15 - JUNIORS      | 896201 | 16.99 T |
| 17 - ACTIVE WEAR  | 656917 | 16.99 T |
| 15 - JUNIORS      | 947205 | 12.99 T |
| 15 - JUNIORS      | 965182 | 12.99 T |
| 15 - JUNIORS      | 929402 | 12.99 T |
| 05 - KNITWEAR     | 465786 | 20.00 T |
| 25 - LADIES SHOES | 197703 | 26.00 T |

SUBTOTAL \$134.95  
VA 5.000% Sales Tax \$5.75  
**TOTAL \$141.70**  
**VISA \$141.70**  
\*\*\*\*\*3276  
PURCHASE  
EXPIRES: \*\*/\*\* SWIPED  
AUTH# 009498  
06/09/12 15:13:28  
REFERENCE #: 19673769

\*\*\*\*\*  
T.J. MAXX VALUES YOUR FEEDBACK!  
Tell us what you think about  
your store visit today and  
enter a monthly drawing to win a  
\$500 T.J. Maxx Gift Card!  
Visit [www.TJMAXXFEEDBACK.com](http://www.TJMAXXFEEDBACK.com)  
Respond by 06/23/12  
You will need to reference  
your receipt  
Survey number: 0661010777  
SEE WEBSITE FOR COMPLETE RULES  
\*\*\*\*\*

9 0 6 6 1 0 1 0 7 7 7 1 5 5 0 3

ITEMS 8  
0101  
0661 01 0777 06/09/12 15:13:07 1000

THANKS FOR SHOPPING. NEW FASHION  
ARRIVES ALL THE TIME. SEE YOU SOON!  
Refunds within 30 days with receipt  
store credit only with gift receipt  
other restrictions may apply.

Report on Special Investigation of the  
Benton Development Group

Copies of Selected Receipts Found in the Trash

**Walmart**   
Save money. Live better.

( 757 ) 416 - 3480  
MANAGER EDWARD RUSSELL  
2021 LYNNHAVEN PKWY  
VIRGINIA BEACH VA 23456

ST# 2529 OP# 00004050 TE# 07 TR# 04657  
DP 28PK 008265750491 F 3.98 R  
BARQS 004900003012 F 3.98 R  
LITE 15P ALU 003410057707 14.88 T  
WR HR SPR 7Z 080921977026 0.94 X  
COOLING GEL 007874214283 4.00 X  
SPTSUNSCREEN 007874214230 5.00 N  
GOLF BALLS 004016987343 7.94 X  
FTL MUSCLES 007603189812 4.27 X  
FTL MUSCLES 007603189812 4.27 X  
\*\* VOIDED ENTRY \*\*  
FTL MUSCLES 007603189812 4.27-X  
FRUIT TSHIRT 007603127273 7.97 X  
CHEETOS 002840003916 F 2.48 R  
CHOC 12PK 003400007018 F 1.78 R  
CHOC 12PK 003400004051 F 1.78 R  
BEVERAGE 007800001328 F 1.58 R  
DR PEPPER 0078000008240 F 1.58 R  
200Z CHY KO 004900001801 F 1.58 R  
DR PEPPER 0078000000386 F 3.33 R  
PEPSI 001200001426 F 3.48 R  
SOBE 073951000402 F 1.00 R  
SOBE 073951000402 F 1.00 R  
SOBE 073951000402 F 1.00 R  
SOBE 073951000402 F 1.00 R  
SOBE 073951000402 F 1.00 R  
SOBE 073951000402 F 1.00 R  
MIKES BEER 063598510062 8.28 T  
MIKES BEER 063598510062 8.28 T  
MIKES BEER 063598510062 8.28 T  
SUBTOTAL 101.39  
TAX 1 5.000 % 3.24  
TAX 2 2.500 % 0.79  
TOTAL 105.42  
VISA TEND 105.42

ACCOUNT # \*\*\*\*\* 9278 S  
APPROVAL # 002535  
REF # 216400242352  
TRANS ID - 0282164022383535  
VALIDATION - 8FSS  
PAYMENT SERVICE - E  
TERMINAL # 45000601

06/11/12 20:37:29  
CHANGE DUE 0.00

**# ITEMS SOLD 26**

TC# 6276 3564 4583 1999 8296 6  
  
"Like" Walmart on Facebook  
[www.facebook.com/Walmart](http://www.facebook.com/Walmart)  
06/11/12 20:37:29  
\*\*\*CUSTOMER COPY\*\*\*

Report on Special Investigation of the  
Benton Development Group

## Copies of Selected Receipts Found in the Trash

Finn McCools  
3388 Princess Anne Road  
Virginia Beach, VA 23453  
757-689-0829

148 Rachel J

Tbl 62/2 Chk 4200 Gst 0  
Jun12'12 06:29PM

|                  |       |
|------------------|-------|
| 8 1.50 Bud Lt    | 10.88 |
| 3 Killians 16    | 10.50 |
| 2 Killians 20    | 11.00 |
| 4 BudLT 20       | 18.00 |
| 1 Guinness Float | 5.99  |
| Subtotal         | 56.37 |
| Tax              | 1.77  |
| 09:09PM Total    | 58.14 |

\*\*\*\*\*  
PRE CONCERT PARTY  
SUNDAY JUNE 17TH  
DAVE MATTHEWS!!!!

Finn McCools  
3388 Princess Anne Road  
Virginia Beach, VA 23453  
757-689-0829

Date: Jun12'12 09:16PM  
Card Type: Visa  
Acct #: XXXXXXXXXXXX9278  
Card Entry: SWIPED  
Trans Type: PURCHASE  
Auth Code: 005593  
Check: 4200  
Table: 62/2  
Server: 148 Rachel J

Subtotal: 58.14

Tip: \_\_\_\_\_

Total: 58.14

Signature  
I agree to pay above total  
according to my card issuer  
agreement.

\* \* \* \* Guest Copy \* \* \* \*

Report on Special Investigation of the  
Benton Development Group

Copies of Selected Receipts Found in the Trash



GET YOUR LION'S SHARE.

#0183 STORE PHONE: (757) 490-1808

Thank You! Sales Associate, JASMINE

CUSTOMER ID VERIFIED - VISUAL APPROVAL  
CAMP R&W CR OF CHI 2.59 B  
1 @ 5/6.45  
CAMP CR OF CHICKEN MVP 1 29 B  
1 @ 2/3.38  
LD SWISS ROLLS MVP 1.69 B  
NAB OREO ORIGINAL MVP 3.99 B  
RITZ WHOLE WHEAT MVP 4.59 B  
MCC POPPY SEED 3.99 B  
NB EZCH SHRPCHED 3.79 B  
2@4.29 NSTL CFMATE CRMY C 8.58 B  
PERD NAT PERF PORT MVP 8.99 B  
DME SOUR CREAM 8OZ .87 B  
IMPERIAL SPRD QUAR .99 B  
DME Y CLBY JACK FN 2.87 B  
APPLE FRITTERS 3PK 3.99 B  
12CT CHERRY FRUIT 2.29 B  
12CT BLUEBERRY FRU 2.29 B  
10CT SNOWFLAKE ROL 1.99 B  
3@4.22 MARL GLD 72NMBXFL 12.66 T  
VF S VS XXXXXXXXXXXX9278 69.45  
\*\*\*\*\* 2.5% FOOD TAX 1.37  
\*\*\*\*\* 5% NON FOOD TAX .63  
\*\*\*\* BALANCE DUE 69.45  
REF# 003371  
CHANGE .00

Total Items Purchased 20  
6/14/12 10:10 0183 03 0007 17

www.foodlion.com  
CUSTOMER SERVICE 1-800-210-9569

THANK YOU FOR SHOPPING FOOD LION  
JOIN OUR MVP PROGRAM TODAY  
AND SAVE EVEN MORE !

PLEASE KEEP YOUR RECEIPT,  
IT IS REQUIRED FOR REFUNDS.



Report on Special Investigation of the  
Benton Development Group

Copies of Selected Receipts Found in the Trash

**ROSS**  
DRESS FOR LESS  
3312 PRINCESS ANN RD STE 801  
VIRGINIA BEACH, VA 23456  
Phone: 757-368-0407

|                |                    |          |   |
|----------------|--------------------|----------|---|
| 400076887794   | BLK MOP THONG WEDG | 16.99    | R |
| 400076906341   | BHPC GREEN 3.4 SPR | 14.99    | R |
| 400074908460   | SL BLACK ROSETTE V | 13.99    | R |
| 400073641856   | Princess in Your   | 4.99     | R |
| 400078170436   | ELBW DOL CHAR AZTE | 8.99     | R |
| 400077605045   | CS WHT SURP SMK WS | 9.99     | R |
| 400076108103   | SPG ADJ YEL SUR    | 9.99     | R |
| 400075283788   | DRK SS W/ NEON PNK | 9.99     | R |
| 400078077940   | GRAY SHORT         | 5.99     | R |
| Subtotal       |                    | \$95.91  |   |
| Taxable 5.000% |                    | \$4.80   |   |
| Total          |                    | \$100.71 |   |

Number of Items Sold: 9  
Number of Items Returned: 0  
Number of Items Deleted: 0

Visa \$100.71  
Card No. XXXXXXXXXXXX9278 <S>  
8021680114600115735  
Auth. No. 008380

Cardholder  
Please Retain for Your Records

Receipt #: 1146-01-8473-2168-6  
Tender Detail#: 1-01-9-08-010071  
Visa 00

Receipt # 1146-01-8473-2168-6  
  
1-01-9-08-010071  


Store: 1146 Reg: 01 Tran: 8473  
Date: 06/16/12 Time: 11:39 Assoc: 160027  
Thank you for shopping at Ross!  
Please visit our website at  
[www.rossstores.com](http://www.rossstores.com)