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#### FOR OFFICIAL USE ONLY - LAW ENFORCEMENT SENSITIVE



DEPARTMENT OF THE ARMY U.S. ARMY CRIMINAL INVESTIGATION COMMAND 6010 6<sup>TH</sup> STREET FORT BELVOIR, VIRGINIA 22060-5506

REPLY TO ATTENTION OF

#### CIOP-COP

S: 3 Oct 08 4 Aug 08

MEMORANDUM FOR Commander, 3<sup>rd</sup> Military Police Group (CID), USACIDC, 4699 N 1<sup>st</sup> Street, Forest Park, GA 30297

SUBJECT: Request for Investigation (0323-08-CID001)

1. The enclosed DoD IG Hotline Complaint (HL# 107789) is being forwarded to your office for investigation.

2. A response to this RFI, to include SEQ / ROI number and Hotline Progress Report, if applicable, will be forwarded to this headquarters, ATTN: CIOP-COP, no later than the above suspense date. If no ROI is initiated, that information will be provided to this headquarters. All correspondence will clearly identify the HQUSACIDC control number.

3. Request acknowledgement of this RFI no later than 14 Aug 08.

4. Point of contact is SA and the second sec

FOR THE DEPUTY CHIEF OF STAFF FOR OPERATIONS:



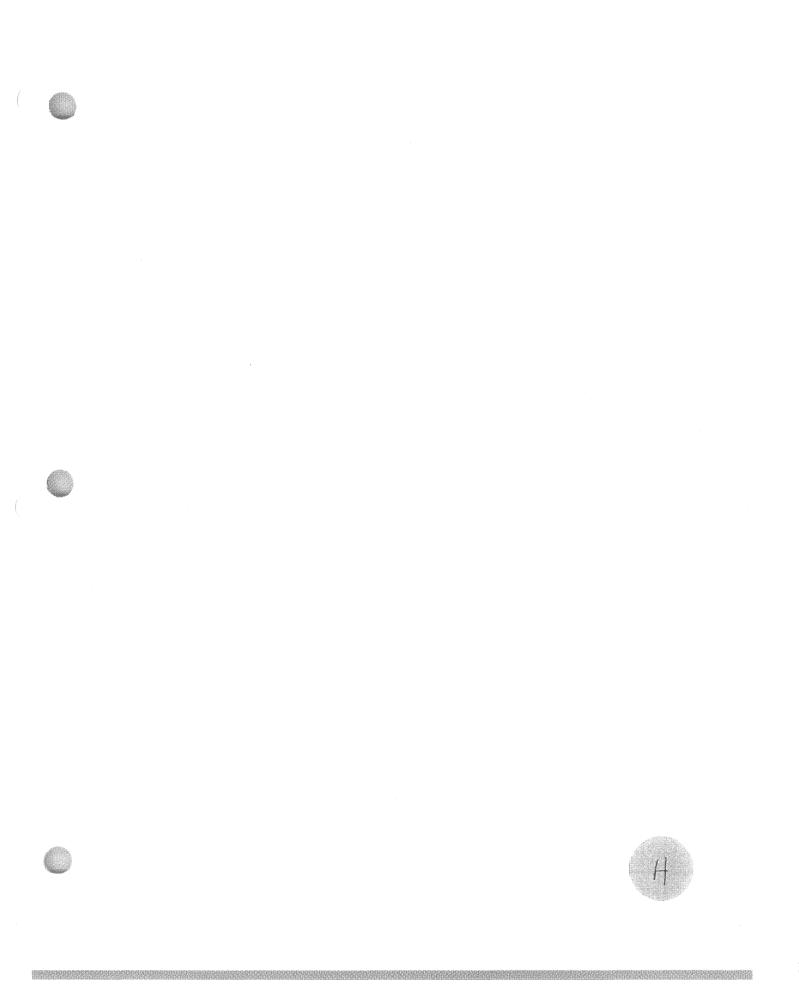
Encl as

CW5, MP Chief, Investigative Operations Division

This is all that was in the Ft. Knox CID file for The DoD Hotline complaint.

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			ROI NUMBER:			
	AGENT'S INVESTIGATION	I REPORT	0292-08-CID032-37187			
	CID Regulation 195-1 For Official Use Only - Law Enforcemen	t Sensitive	PAGE 1 OF 2 PAGES			
	DETAILS About 1315, 21 Oct 08, SA contractions, to collect bank records from his checking account.	his office, obtaine	ed financial consent from Mr HARRIS to			
	About 1307, 4 Nov 08, SA <b>Constant</b> interview Corps of Engineers, Louisville, KY 40201, who and observations concerning Mr	ed Mr rendered a sworm el vouchers and lo	a statement in which he reported his actions dging receipts.			
	About 0900, 6 Nov 08, SA <b>Sector and Sector </b>	tement in which h	ne reported his actions and observation			
	About 1410, 6 Nov 08, SA second interviewed Mr POLLY, who provided a sworn statement wherein he stated Mr stated and Mr second committed travel fraud. Mr POLLY stated he had no first-hand knowledge or proof of the fraud, only word of mouth assumptions. Mr POLLY provided paperwork wherein he documented the fraud of Mr second Mr second and the involvement of Mr					
	About 1455, 7 Nov 08, SA <b>Market Bare-intervie</b> Mr POLLY then played the voice ma ranscribed by SA <b>Market Bar</b> as follows:					
	"Paul what are you trying to do again? What did They ain't, they ain't talkin' to <b>state they</b> , they momma died when she was fifteen. She never he out. I owe you one for this one buddy, reporting but (incoherent words). I owe you one."	're goin' after her ad a daddy. And	r. Poor little girl ain't had nothin'. Her now they're goin' after her. She's wiggin'			
			ed the U.S. Army Corp of Engineers Audit my Corps of Engineers, Louisville, KY			
9		in an attempt to r	eillance on the residence where it was make contact with her as she left for work, at in the home and nobody left the residence.			
	AGENT'S COMMENT: During the course of th 0600-1800. Additionally, SA	e investigation it voored Ms				
	TYPED AGENT'S NAME AND SEQUENCE NUMBER: Special Agent,	3 <sup>rd</sup> Milit	<pre>ditary Police Detachment (CID) tary Police Group (CID), ox, KY 40121</pre>			
	JIGNATURE :	DATE :	Nov 08			
		FICIAL USE O				
	1 FEB 77 LAW ENFOR	CEMENT SENSI	TTIVE			

				ROI NUMBER: 0292-08-CID032-37187
	AGENT'S	INVESTIGATION	REPORT	0292-08-010032-37107
~	For Official	CID Regulation 195-1 Use Only - Law Enforcement	Sensitive	PAGE 2 OF 2 PAGES
	This information w	ered one of the calls, but imme as related to SA <b>Sector 1</b> w. who admitted she hung	ho later made co	when SA <b>Managements</b> asked to speak to her. ntact with Mr. Who related he had
	related she and Mr "Boyfriend/Girlfrie would reside at her would stated as when he stayed wit reflected something	nd" relationship. Ms apartment located in Evansvil y between a week upto a mont the years progressed, Mr h her. Ms b her. Ms b her. Ms b bed and Breakfast; e never own any business, and	her for about eig stated since th le, IN when he v th and half,, at he would pay provided Mr but could not re she only provided	d Ms <b>Sector</b> , SSN refused, who ht years. During this time, they developed a ey have known each other, Mr worked in the area. Ms <b>Sector</b> stated Mr er apartment, depending on his job. Ms her between \$55.00 to \$70.00 a day for rent with a computer generated receipt that member signing any of the receipts. Ms ed a receipt because it was just something she provide any other information.
	Agent's Comment: terminated the inter	Ms became uneasy view stating she had to attend		ions were being asked. Ms <b>being asked</b> hat were in her care.
	Official Statement. Paragraph A(1)(E)(2	, Special Assistant U.S. Attor. Mr groups or Ms groups probable cause to believe Mr CPT groups explained in acc 2), Mr groups was entitled to	ney, Knox Legal committed as ordance with the preimbursement	cumstances of this investigation with CPT Center, Fort Knox, KY 40121. CPT my criminal offense. CPT further itted the offenses of Fraud, Larceny, or False FTR, Appendix 0, Section T4040, while residing with a friend. CPT not materially false statements.
	Martin Luther King	7 08, SA <b>Contract Constant</b> coordinate Jr. Place, Louisville, KY 4020 d to review the records of Ms	2, who was brie	fed on the possible earned income of Ms fractional for any unreported earned
F	XY, on the outcome inal supplemental results.	of the supplemental investigate port along with all exhibits w	tive activity cond ould be provided	
,	TYPED AGENT'S NAME A Special Agent		3 <sup>rd</sup> Milit	t: Litary Police Detachment (CID) ary Police Group (CID), x, KY 40121
	IGNATURE :		DATE: 26 1	Nov 08
	CID FORM 94		ICIAL USE O EMENT SENSI	

# STATEMENT OF CUSTOMER RIGHTS UNDER THE RIGHT TO FINANCIAL PRIVACY ACT OF 1978

Federal law protects the privacy of your financial records. Before banks, savings and loan associations, credit unions, credit card issuers, or other financial institutions may give financial information about you to a Federal agency, certain procedures must be followed.

#### CONSENT TO FINANCIAL RECORDS

You may be asked to consent to the financial institution making your financial records available to the Government. You may withhold your consent, and your consent is not required as a condition of doing business with any financial institution. If you give your consent, it can be revoked in writing at any time before your records are disclosed Furthermore, any consent you give is effective for only 3 months and your financial institution must keep a record of the instances in which it discloses your financial information.

#### WITHOUT YOUR CONSENT

Without your consent, a Federal agency that wants to see your financial records may do so ordinarily only by means of a lawful subpoena, summons, formal written request, or search warrant for that purpose. Generally, the Federal agency must give you advance notice of its request for your records, explaining why the information is being sought and telling you how to object in court. The Federal agency must also send you copies of court documents to be prepared by you with instructions for filling them out. While these procedures will be kept as simple as possible, you may want to consult an attorney before making a challenge to a Federal agency's request.

#### **EXCEPTIONS**

In some circumstances, a Federal agency may obtain financial information about you without advance notice or your consent. In most of these cases, the Federal agency will be required to go to court for permission to obtain your records without giving you notice beforehand. In these instances, the court will make the Government show that its investigation and request for your records are proper. When the reason for the delay of notice no longer exists, you will usually be notified that your records were obtained.

#### TRANSFER OF INFORMATION

Generally, a Federal agency that obtains your financial records is prohibited from transferring them to another Federal agency unless it certifies in writing the transfer is proper and sends a notice to you that your records have been sent to another agency.

PENALTIES



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Page 1 of 2 Pages

If the Federal agency or financial institution violates the Right to Financial Privacy Act, you may sue for damages or seek compliance with the law. If you win, you may be repaid your attorney's fees and costs.

## ADDITIONAL INFORMATION

If you have any questions about your rights under this law, or about how to consent to release your financial records, please call the official whose name and telephone number appears below:

Fort Knox. KY 40121 RELEASE OF CONSENT FINANCIAL PRIVACY ACT

I understand that this authorization may be revoked by me in writing at any time before my records, as described above, are disclosed, and that this authorizations valid for no more than 3 months from the date of my signature.

Date: 10-21-08

Signat

EXHIST IZ

#### FOR OFFICIAL USE ONLY LAW ENFORCEMENT SENSITIVE

Page 2 of 2 Pages

V / 1 0 1 SWORN STATEMENT For use of this form, see AR 190-45; the proponent agency is Office of The Deputy Chief of Staff for Personnel FILE NUMBER DATE TIME LOCATION ouisuille Kt 11/4/08 14:06 GRADE/STATUS SOCIAL SECURITY NUMBER GS-15 ORGANIZATION OR ADDRESS U.S. Army Corps of Engineers, houisville, KY 40201 WANT TO MAKE THE FOLLOWING STATEMENT UNDER OATH: While Chief, Physical Support Branch, US Army Corps of Binginsers, Louisville District, I approved travel orders and traval vocchars. On one decarsion while reliaming a travel vouchan from Mr. 1, I noticed a different looking lodging rescalet. The reacipt was written or typed on a plain piece of paper with B & B on the top of the page. I asked Mr. I about this receipt and I that asked him if this was a lagitimate place of lodging, Mr. Social the plane was a BEB establishment. I said it looks very Suspicious and he made to make surre it was on the up and up. After reviewing this voushor, I took the address given on the receipt and drave to the area listed. I did not verify the address areatly, however, this area was only apartment buildings. I chacked with our hogistics Branch and quastioned the suspicious recaipt. To the best of my mamory, Logistics parsonnel said if the vacaint had a address, phone number, and other identification there were no issues. They quoted EXHIBIT INITIALS OF PERSON MAKING STATEMENT 2 H PAGES PAGE 1 OF DATED ADDITIONAL PAGES MUST CONTAIN THE HEADING "STATEMENT OF TAKEN AT CONTINUED." HE BOTTOM OF EACH ADDITIONAL PAGE MUST BEAR THE INITIALS OF THE PERSON MAKING THE STATEMENT AND BE OF PAGES." WHEN ADDITIONAL PAGES ARE UTILIZED, THE BACK OF PAGE 1 WILL BE INITIALED AS "PAGE LINED OUT, AND THE STATEMENT WILL BE CONCLUDED ON THE REVERSE SIDE OF ANOTHER COPY OF THIS FORM. DA FORM 2823 SUPERSEDES DA FORM 2823, 1 JAN 68, WHICH WILL BE USED FOR OFFICAL USE ONLY/LAW ENFORCEMENT SENSITIVE 巨烈的同门 /3

Something from the JTR (Joint Traval Regulation). .F my mamory starsis is correct, this travel area was in Bransvilla, IN. After discussing this with Logistics parsonnal, I did not pursue any other invastigation Q.1 A say anything Q. Other than what you stated above, Did MR further about his lodging hocation -A. No nothing that I vamenbar. Q. Did you question any of Mr B. B. Ro-worken about B+B? A. No. Doyou remember who you talked to in the hogistics Branch Q. about M. hodging Situation? J to not ramamber. Q. How long were you in the Physical Support Branch? May Laars - Nov 2004 start working Q. Do you remember when Munder you A. No. Q. Were you Mr Mirect Super Visor! Ifnot, Do you remember who that porson may have been No I was not his direct supervisor. His direct supervisor Nis direct Supervisor Was did not review or approve travel vouchers. Vouchers have reviewed by upper management (Superintendant & Branch Chiel). INITIALS OF PERSON MAKING STATEMENT PAGE 2 OF 4 PAGES EXFIBIL 13 LISE ONLY/LAW ENFORCEMENT SENSITIVE

AKEN AT LOUIS UT 1/0, K+ DATED 4.008 CONTINUED: STATEMENT OF Q. Did Mr 55 ever Acknowledge that " Was his girlfriend. A. No, not that To remembered. Remor was it was his Q. Did you even meet "? A. No. Q. Is there any question that "B+B' was a false Business. A. None other than the versiont torcoint looked suspicious. Q. After talking to the hogistics Branch Dersonal, Did you inform anyone also about your supple concerns with MR travel vouchors? (Superint and art). A. None other than Mr. possibly Poyouwish to add anything to this statement? No. III End of Statement /11 

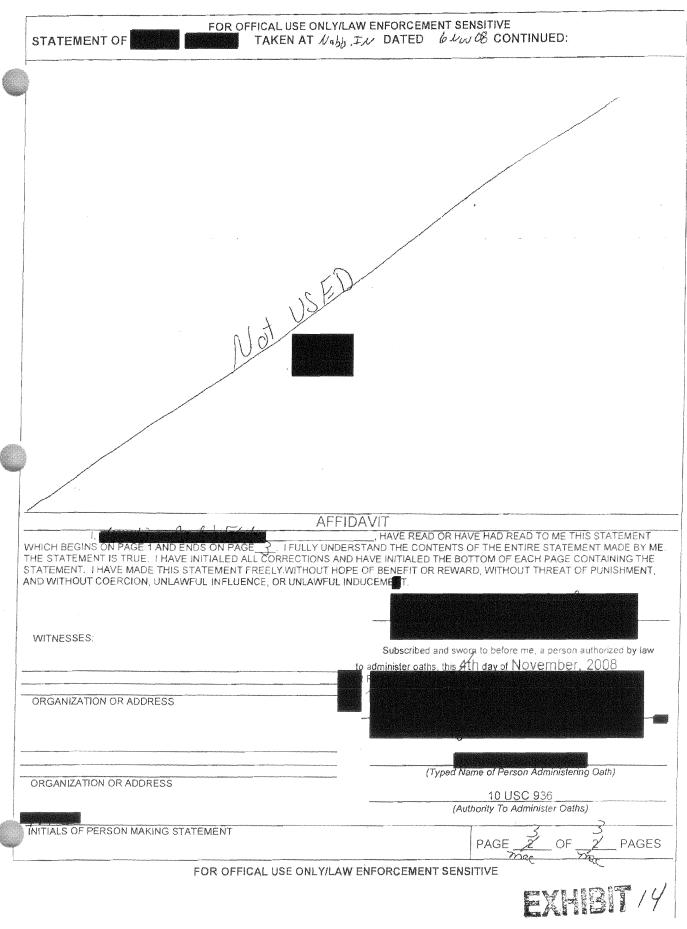
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(,)		AFFIDAVIT , HAVE READ OR HAVE HAD READ TO ME THIS STATEMENT
THE STATEMENT IS TR	RUE, I HAVE INITIALED ALL COR	I FULLY UNDERSTAND THE CONTENTS OF THE ENTIRE STATEMENT MADE BY ME. RECTIONS AND HAVE INITIALED THE BOTTOM OF EACH PAGE CONTAINING THE Y WITHOUT HOPE OF BENEFIT OR REWARD, WITHOUT THREAT OF PUNISHMENT,
	ION, UNLAWFUL INFLUENCE, O	
WITNESSES:		(Signature of Person Making Statement)
		Subscribed and sworn to before me, a person authorized by law to administer oaths, this 4th day of November, 2008
		a a
ORGANIZATION OR A	ADDRESS	
		(Typed Name of Person Administering Oath)
ORGANIZATION OR A	DDRESS	10 USC 936
		(Authonity To Administer Oaths)
INITIALS OF PERSON	MAKING STATEMENT	PAGE OF PAGES
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		EXENSIT 13

FUT - FRUME USE UNE DEMAN LAN SAME 0 92-08-CD032-3718/ SWORN STATEMENT For use of this form, see AR 190-45; the proponent agency is Office of The Deputy Chief of Staff for Personnel. mac DATE mar TIME FILE NUMBER 0939 6NW 08 GRADE/STATUS IL 47147 ARK  $\perp \nu$ VANT TO MAKE THE FOLLOWING STATEMENT UNDER OATH: have the. When this situation first occurred pred ADDI Geroung Of checked the place of 20 Olimer. My spoke to Da to the best of Q. hat is Lix nia 1-24 point, Travel Opproving Off ities of the also felt comp le 1m own 5 traull oucher Ø A. your relationship to MR What was 0 sighest level supervisor on the job site he A. basis and a 20 level supervisor t ally mad was my direct supervisor Q of traveluouchas guthorize any responsibility to you Tho pritagela on on extended the office Karely was out cen EXHIBIT INITIALS OF PERSON MAKING STATEMENT nac PAGES PAGE 1 OF ADDITIONAL PAGES MUST CONTAIN THE HEADING "STATEMENT OF CONTINUED." DATED TAKEN AT THE BOTTOM OF EACH ADDITIONAL PAGE MUST BEAR THE INITIALS OF THE PERSON MAKING THE STATEMENT AND BE PAGES." WHEN ADDITIONAL PAGES ARE UTILIZED, THE BACK OF PAGE 1 WILL BE OF INITIALED AS "PAGE\_ LINED OUT, AND THE STATEMENT WILL BE CONCLUDED ON THE REVERSE SIDE OF ANOTHER COPY OF THIS FORM. DA FORM 2823 SUPERSEDES DA FORM 2823, 1 JAN 68, WHICH WILL BE FOR OFFICAL USE ONLY/LAW ENFORCEMENT SENSITIVE 14

AKEN AT Nabb, IN DATED 0 - 220 08 - CBMTS 2ED3 7 187 STATEMENT OF Q. Did you ever guestion Mr lodging receipts . - No 2. Do you know if Mr ever spoke to about Mr lodging receipts. A. I believe be did when he checked the lodging location. 2. Did you talk to Mr about his Lodging At Bout Breakfast"? A. Ylo. Q. How Long were you the approving Official for travel vouchers? A. Probably 1-2 yes prior to my returement on 1 May 2007 Q. Do you know Mr Polly? A. He was on the job site daily, but under a different supervisor. I know him to be a jealous person and very disguistled if he didn't get his way. Q. Do you have anything to add to this statement is aware of how serious A. Im sure Mr. a fradulent travel claim can be. Q. Anything olse 9. NO III Env of Statement /11

INITIALS OF PERSON MAKING STATEMENT	PAGE	2 OF	3	PAGES
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LOCATION	***************************************		5; the proponent ag	TIME, PAP	FILE NUMBER
Building 1467, 3 <sup>rd</sup> Avenue, Fort Kni			6 Nov 08	1410 per	0292-08-CID032-37187
LAST NAME, FIRST NAME, MIDD POLLY, Paul Jason			SOCIAL SECUR	RITY NUMBER	RANK/STATUS CIV
ADDRESS/ORGANIZATION					
Owensboro? A: Myself or other employ get paid TDY for it. He we	who I worked Owensboro? Mr about Owensive ower place is when Mr about Owensive is was in New A er place is when Mr a the "50 mile in talking to ot would overhee onight?" He y of any of Mr mention gett: tees would tell build tell us that tell you how how much he rong he would aware of, did nd he did it si since I was en ts, but saw eac	ing paid for lo him that it was getting with the was stay much TDY h	in Owensboro noun being wh her than Owen old the house a n Louisville. re-imburseme ur" distance fr Every week I w e in conversat m what she wa travel vouche odging while h ras wrong that ing with relative e was getting p oaid. He just s y, I'm staying get paid for s e was hired. I USACE Louis day.	? ere he grew up a sboro? nd moved to a c onts for lodging, om his residenc yould hear him s ion with him as as cooking. Ms rs? e was staying w he was able to s yes. baid when he was aid he was getti with relatives." staying at his residence.	and lived at. condo in Clarksville, IN. TDY, per diem, etc. e? say that he was going to k him "What is Ms with his wife in stay at home and still as staying in ing paid. Whenever he sidence in Owensboro? red in 2003 or 2004.
Q: Do you know ' <b>final and</b> A: I would hang out with b	oth of them, b	ut we never v continued o	vent to her apa n next page	rtment.	un an
ХНІВІТ			RSON MAKING ST		
			PP		PAGE 1 OF 4 PAGES
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(	"STATEMENT OF Mr Polly TAKEN AT Building 1467, Fort Knox, KY 40121, & wov 09, CONCHOURD 2 - 3 7 1 8 7 Q: What kind of activities would you do with Mr and "and "outside of work? A: We would have a bowling night on Wednesday for the crew that we worked with. We would go out to different bars in Evansville or go to the gambling boat together. We would go gambling about three or four times out of the year.
	A: I don't know how much money they would have, but usually they lost. He would always give her more
	money while there.
	Q: Do you know if 'get goes to the gambling boat by herself? A: Yes she does. Mr get would tell me about her going to the boat on her own. I'd hear him talk about it about twice a month. He would sound irritated with it and wasn't always happy with her going there on her own.
	Q: What city does ' live in? A: Evansville, IN.
	Q: Have you ever seen ' apartment?
	A: No. Q: How do you know Mr <b>Constant</b> was receiving re-imbursements for his lodging, TDY, per diem, etc. while staying with " <b>Constant</b> "
	A: Since I was employed there he would talk to myself and other employees about staying with his girlfriend and collecting per diem: We would tell him that was not right and he would tell us that he just puts Bed and Breakfast" on the receipts.
	Q: Did you ever see a copy of any of Mr and the vouchers?
	A: I would see his travel book lying out while we were in Evansville, but I wouldn't actually see a travel
	voucher. Our travel vouchers are handled by our clerk so we don't see each other's vouchers. Q: What is the "travel book"?
	A: It's a diary sized book, usually green, to write down our days, mileage, and expenses. Then you put the hotel receipt with the book, total up the mileage, and add any expenses while TDY in it. Then we turn the book
	to the clerk and he completes the voucher. We sign it when it's complete and then it's sent to the approving official to be signed.
	Q: Did Mr <b>sectors</b> ever tell you how much TDY he was getting paid while he was staying with <b>'and the sectors</b> A: he would tell me that he would get the full TDY. This would include the hotel, full meal, and mileage.
	Q: How long, that you are aware of, did Mr get paid for staying with '
	A: My employment started in 1999 as a temporary employee. I was aware of it then. I am not sure when he started dating and living with 'free with We started hanging out around 2002.
	Q: How do you know Mr <b>State of State o</b>
	and then my branch chief. Q: How do you know that he was authorizing Mr <b>second states</b> to stay at his residence and collect fraudulent re-
	imbursements? A: He is an approving official. He is the one that has to authorize it. Either Mr and the or Mr and the second
	would sign as the approving official for fleet vouchers. Mr <b>second sign</b> could only sign Mr <b>second second</b> vouchers (fleet personnel), but could not sign Mr <b>second second</b> vouchers.
	Q: How do you know Mr where Mr where Mr residence was located?
	A: Mr sectors and Mr sectors hired Mr sectors. They know where he is from because Mr
	talks about where he is from while all of us were present. His home phone number was also listed on the board.
	Q: Why would Mr second or Mr second authorize a fraudulent travel voucher submitted by Mr
	A: They would approve his vouchers because he was their fleet captain. They would want to "take care of
	him," in my opinion. Mr <b>Sector and Mr Merce and were both kind of like little spies who would report to</b>
	em what everyone else was doing. POP PAGE 2 OF <u>4</u> PAGES.
	For Official Use Only – Law Enforcement Sensitive

"STATEMENT OF Mr Polly TAKEN AT Building 1467, Fort Knox, KY 40121, 6 nov 08, CONTINUED." Q: How do you know Mr and Mr

A: Mr and that she lives in Evansville. Mr IS is a guy who likes to brag about who he is seeing and we would always hear about 'They received vouchers from him which contained receipts with 'Bed and Breakfast' on them. Common sense would tell anyone to check it out. Mr and the would also go out bowling with Mr Mr was also an approving official who could have signed Mr

also went out bowling with us.

Q: Did you ever report the fraudulent vouchers to anyone?

A: I did probably in 2002. I left a note without my name on it to Mr which stated that I found Mr stated that I found Mr staying at his girlfriend's house and getting any TDY was wrong. Nothing was ever done about it. Q: How long were you employed at USACE Louisville?

A: From 1999 (temporary) to Dec 2002 when I was hired in permanently. I resigned on 5 Feb 2008.

Q: Why did you resign from USACE Louisville?

A: On my resignation it has no reason for it. I chose to leave that open as an agreement between myself and the corps.

Q: Was there a specific reason, personal or work related, that you left?

A: One reason I left there is because of safety issues. Safety is the preached main priority until they realize it is going to delay the completion of work. Mr second was operating a crane, which he was not trained on and almost dropped a boom on me. That's part of the reason I left.

Q: Did you resign from USACE or were you removed?

A: I resigned as a settlement agreement between USACE and myself which was a signed and sealed agreement that is not to be discussed. No one is supposed to say that I was removed or give a reason as to why I left the job.

Q: Do you have anything further which you would like to add to your statement?

: There are other employees who know a massive amount of information pertaining to the unauthorized, legal activities being conducted by the USACE. These other employees are afraid to speak up on all of these matters because they saw what happened to me.

Q: Do you have anything further which you would like to add to your statement?

A: No.///End of Statement/// 707

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	IS STATEMENT WHICH BEGINS ON PAGE 1 AND ENDS ON PAGE 4. I FULLY
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ORRECTIONS AND HAVE INITIALED THE BOTTOM OF I REELY WITHOUT HOPE OR BENEFIT OR REWARD, WIT IFLUENCE, OR UNLAWFUL INDUCEMENT.	MENT MADE BY ME. THE STATEMENT IS TRUE. I HAVE INITIALED ALL EACH PAGE CONTAINING THE STATEMENT. I HAVE MADE THIS STATEMENT THOUT THREAT OF PUNISHMENT, AND WITHOUT COERCION, UNLAWFUL (Signature of Person Making Statement) Subscribed and sworn to before me, a person authorized by Law to administer oaths, this 6th day of November 2008
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ORRECTIONS AND HAVE INITIALED THE BOTTOM OF I REELY WITHOUT HOPE OR BENEFIT OR REWARD, WIT IFLUENCE, OR UNLAWFUL INDUCEMENT.	MENT MADE BY ME. THE STATEMENT IS TRUE. I HAVE INITIALED ALL EACH PAGE CONTAINING THE STATEMENT. I HAVE MADE THIS STATEMENT THOUT THREAT OF PUNISHMENT, AND WATHOUT COERCION, UNLAWFUL. (Signature of Person Making Statement) Subscribed and sworn to before me, a person authorized by Law to administer oaths, this 6th day of November 2008 at Building 1467, 3 <sup>rd</sup> Avenue, Fort Knox, KY 40121 (Typed Name of Person Administering Oath)
ORRECTIONS AND HAVE INITIALED THE BOTTOM OF I REELY WITHOUT HOPE OR BENEFIT OR REWARD, WIT IFLUENCE, OR UNLAWFUL INDUCEMENT. ITNESSES:	MENT MADE BY ME. THE STATEMENT IS TRUE. I HAVE INITIALED ALL EACH PAGE CONTAINING THE STATEMENT. I HAVE MADE THIS STATEMENT THOUT THREAT OF PUNISHMENT, AND WITHOUT COERCION, UNLAWFUL. (Signature of Person Mekking Statement) Subscribed and sworn to before me, a person authorized by Law to administer oaths, this 6th day of November 2008 at Building 1467, 3 <sup>rd</sup> Avenue, Fort Knox, KY 40121 (Typed Name of Person Administering Oath) 10 USC 936
ORRECTIONS AND HAVE INITIALED THE BOTTOM OF I REELY WITHOUT HOPE OR BENEFIT OR REWARD, WIT IFLUENCE, OR UNLAWFUL INDUCEMENT.	MENT MADE BY ME. THE STATEMENT IS TRUE. I HAVE INITIALED ALL EACH PAGE CONTAINING THE STATEMENT. I HAVE MADE THIS STATEMENT THOUT THREAT OF PUNISHMENT, AND WATHOUT COERCION, UNLAWFUL. (Signature of Person Making Statement) Subscribed and sworn to before me, a person authorized by Law to administer oaths, this 6th day of November 2008 at Building 1467, 3 <sup>rd</sup> Avenue, Fort Knox, KY 40121 (Typed Name of Person Administering Oath)
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DEPARTMENT OF THE ARMY LOUISVILLE DISTRICT, CORPS OF ENGINEERS INTERNAL REVIEW OFFICE P.O. BOX 59 LOUISVILLE, KENTUCKY 40201-0059

CELRL-IR

7 November 2008

EXERT 16

# MEMORANDUM FOR Commander, Louisville District Corps of Engineers

SUBJECT: CELRL-IR Audit Report No. 08-28 - CID Hotline - Travel Irregularities

1. <u>Background and Summary of Conclusions</u>: This review was requested by the Commander through a Special Agent-in-Charge, from the 280<sup>th</sup> MP Detachment, Criminal Investigation Command (CID) of Fort Knox, KY and followed through by a second Special Agent. Through a Hotline Call, it was alleged that 2 individuals may have misrepresented their travel costs during the past few years, either by claiming unwarranted lodging and food expenses near a primary residence and/or by staying with a friend instead of utilizing commercial lodging, and, then, upon submitting these allegedly false lodging bills, may have been overpaid by the corresponding amounts. While we have maintained the original allegations on file, an abbreviated synopsis has been provided, for management purposes, as follows:

a. First employee claimed lodging and food expenses when he worked on job sites which were within 50 miles of his primary residence in Owensboro, KY.

b. Second employee claimed lodging and food expenses when he worked on job sites which were within 50 miles of his primary residence in Louisville, KY.

c. Second employee submitted receipts for lodging at a purported Bed and Breakfast which was actually the residence of his girlfriend and not a Bed and Breakfast.

It should be noted that the allegations were sent to CID on 22 JUL 08. Internal Review (IR) was first contacted on Tuesday, 5 AUG 08 and a formal participation request was received 7 AUG 08. IR, CID and OC mutually agreed to a limited review. Also, on 5 NOV, the Special Agent requested this report. We have determined that one of CID's criteria (Less than 50 miles distance from a primary residence) was inapplicable in these temporary duty situations and was only applicable to Permanent Change of Station (PCS) moves.

IR performed analysis among the 12-man-years of travel vouchers based only upon the following: record examination and analysis; internet searches; telephonic inquiries; and other research.

The two objectives for this review were as follows:

- To conduct an internet search, and make other inquiries as deemed appropriate, into Questionable Lodging Establishments.
- To derive an estimate of potential loss based upon amounts charged among Questionable Lodging Receipts.

We determined that certain lodging establishments may have been questionable for a variety of reasons. Results were inconclusive for the first of the two employees. Nonetheless, we concluded that 28 submitted lodging receipts may have been questionable<sup>1</sup>, for the second employee, and, accordingly, may have represented a loss to the government of \$22, 215.00.

LAW ENFORCEMENT SENSITIVE FOR OFFICI-Subjections and Its Standard Sensitive Reconcertation of the sensitive standard sensitive 2. <u>Scope and Methodology</u>: This engagement, conducted intermittently among other assignments from 5 August to 14 October 2008, was performed in accordance with generally accepted government audit standards for other services. During this review, we examined available travel vouchers and related documentation for the requested timeframes of FY 2004 through July 2008 for one individual (first employee) and FY 2002 through July 2008 for the other (second employee). We analyzed the documentation, searched applicable internet sites, made phone calls and sought further assistance from Office of Counsel.

3. Observations and Conclusions: We have summarized our results based upon the 2 objectives:

3a. Observations.

# Objective 1: Internet Search, and Other Inquiries into Questionable Lodging Establishments.

Below are the results of our review of Questionable Lodging Establishments<sup>2</sup>:

We observed possible irregularities among 4 distinctly-named businesses related to 2 locations. The first was named "Green River Apartments," with no address specified. The lodging bill stated "Payable to stated", and provided a telephone number, second at the location of the location

office for the Green River Apartments may have been situated at a common location.

The other main location, **because of the second sec** 

Name of the Lodging Business:Telephone No.:Bed and BreakfastNorth Side ApartmentNorth Side ApartmentsImage: State State

Comment . Proper Area Code; but, Number Disconnected. Irregular Area Code. Singular "Apartment." Irregular Area Code. Plural "Apartments."

EXHIBIT 16

There were various possible irregularities among these initial, questionable lodging bills. Such indicators included, but were not limited to, the following:

• Employee 2: A change from an ordinary Indiana Area Code to an Area Code used in much of Western Kentucky, including, also, the Greater Louisville area, for this questioned business in Indiana.

• Employee 2: A change from "North Side Apartment" (singular) to "North Side Apartments" (plural) among 2 consecutive stays: April 18<sup>th</sup> thru May 1<sup>st</sup>, 2005 vs. May 2<sup>nd</sup> thru May 22<sup>nd</sup>, 2005.

• Employee 2: A substantive change in the font size and style between two "North Side Apartments" lodging bills.

• Employees 1 & 2: Two more lodging locations, of lesser concern were provided as additional information<sup>3</sup>:

	Alternate Location Addresses:	Lesser Concerns Comment .
1 <sup>ST</sup> Employee:	5135 Cairo Rd., Paducah, KY	Ownership changes; unusual e-mail address for a business.
	[Paducah Suites, Paducah Inn &	Suites, and Ramada Limited Suites, et al.]
2 <sup>ND</sup> Employee:	218 Main St., Carrollton, KY. [Carrollton Inn, above.]	Generic (Office Supply) type of receipt used; Simplistic lodging receipt with no lodging tax.

<sup>2</sup> See APPENDIX A1: Employee 1 at first item and Employee 2 among all others.

See APPENDIX A2: Employee 1 at first page and Employee 2 at second page.

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#### 3a. Observations. (continued)

# Objective 2: Estimate of Potential Loss based on amounts charged on Questionable Lodging Receipts.

Our analysis<sup>4</sup> provided the specifics which suggest that the first employee may have submitted a questionable lodging bill in the amount of \$935.00 comprising 17 nights at \$55.00 per night. Upon closer examination of this documentation and comparison to internet information, we determined that the last name of the payee on the lodging bill, appeared to be a derivative from within the business name for an entirely different establishment, with the same phone number, as follows: Electrical Service, Electrical Service, Electrical Service, Determined that the service of the payee on the lodging bill, the same phone number, is possible one individual may be operating two distinct businesses sharing a common location.

Additional analysis<sup>5</sup> provided a series of 28 instances for the second employee in which a common address, but 3 differing business names and 2 differing phone numbers were utilized among the lodging bills in question. Our results disclose a potential estimated loss of \$22,215.00. Upon a closer examination of the lodging bills, certain inconsistencies were observed:

• On all three Travel Vouchers (TV) associated with Travel Order Number 105348H2, the Lodging Bills all specified an address of "514 Richardt Lane" for which the "Lane" had been marked through and annotated as "Ave." and the Phone Number [\_\_\_\_\_\_\_] had, likewise, been handwritten:

TV 01; Signed 10/09/01; Stay Duration: 09/24/01 through 10/07/01 TV 02; Signed 10/25/01; Stay Duration: 10/08/01 through 10/21/01 TV 03; Signed 11/15/01; Stay Duration: 10/22/01 through 11/05/01

• As referred to in Objective 1, differences were noted between two successive Travel Vouchers associated with Travel Order No. 502106H2:

TV 01 North Side Apartment Signed 5/04/05 (Singular Business Name)

TV 02 North Side Apartments Signed 5/20/05 (Plural Business Name)

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• We further noted that the Lodging Bill corresponding with Travel Order 600049H2 appeared to have been annotated to change its original 3-Night Duration to 4-Night Duration so as to reflect an "extra" night, as follows:

		Number	Paid on
	Duration of Employee Stay	of Nights	this Date:
Original Lodging Bill Dates:	10/11, 12, & 13	3	10/14/05
Annotated Lodging Dates:	10/10, 11, 12, & 13	4	10/14/05

• Our search did not find the business name of the apartments. However, it found a list of occupants. The first name of one of the occupants could well have been shortened to 'Example of Bed & Breakfast."

• In 8 instances we noted the employee appeared to pay for his lodging on the departure date; conversely, the employee appeared to pay on the last night among 20 instances. Given that the employee works for Operations Division, and the nature of the work, further review may be necessary to definitely conclude if this is an irregularity.

3b. Conclusions.

See APPENDIX B1 See APPENDIX B2

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We were able to furnish information and provide support for a potential estimated loss:

-- a. There were numerous indicators of potential irregularities, among the records obtained pertinent to the second employee. These irregularities may have resulted in a potential loss to the government of \$22, 215.00.

-- b. The "Less than 50 mile" Criterion for Lodging and Meal Eligibility pertains to Permanent. Change of Station and not regular temporary duty.

-- c. There were much lesser concerns of inconsistencies among lodging establishments at two other locations: one in Paducah, KY, and another one in Carrollton, KY.

4. <u>Suggestions</u>. We suggest that CID perform further investigation, including on-site visitations and interviews with the employees to determine further actions in regards to irregularities and the potential loss.



Chief, Internal Review

Enclosure: Appendices A1, A2, B1 and B2.

CF: DD OC





AFricNDIX A1 CELRU-IR 09-28 CID Holline - Travel Irregutanties Questionable Lodging Receipt Forms

San Pees		1ST		340
Comment	Insufficient address, simplisitic form. <u>Com. 1</u> Address given is that of <u>Electrical</u> Services, <u>Com.2</u> : Payee is , who resides at <u>a distance</u> time of approximately 6.7 miles and 14	15T 16.2 million million manual second contraction data yought.com minutes. However, may be OK 15T	Simplisitic form; no lodging taxes. Somewhat uruusual to pay balance due on the last lodging night rather than during the morning (departure) check-out. <u>Com.1</u> : Name may be invalid; Address appears legitimate: mapquest. <u>Com.2</u> : Telephone number searched but not listed.	Simplisitic form; no lodging taxes. <u>Com.1</u> : Name may be invalid; Address appears legitimate: mapquest. <u>Com.2</u> : Telephone number searched but not listed. <u>Com.3</u> : Disregard the address search on InfoSpace: "Failed request due to errors." It is mentioned separately as "Lane" was marked through and both "Ave." and " marked through and both "Ave." and " was marked through and both "Ave." and " We annotated. <u>Com.4</u> : Per 8/9/08 Call. "The number you have reached has been disconnected or is no longer in service."
Information Source:	switchboard come and		switchboard.com (including "InfoSpace"); google.com; businesslicenses.com [Indiana (IN) Business License & Business Permit List], and, Dunn and Bradstreet (Bed & Breakfast Listing). Used mapquest.com to validate address.	switchboard.com (including "InfoSpace"): google.com; businessticenses.com [Indiana (IN) Business License & Business Permit List]: and. Dunn and Bradstret (Bed & Breakfast Listing). Call Placed from Cell Phone @4:18PM on SAT, Aug 9, 2008.
Phone No. Documentation				
Name and Address of the Original Lodging Bill / Invoice:	Green River Apartments, Calhoun, KY 42327   Payable to Ann Floyd, 1592 Brooks Sch. Hs. Rd., Calhoun, Ky. 42327 270-		Bed and Breakfast	Bed and Breakfast Ave.
Sign Date	07/28/04		07/10/03	11/15/01
The TV No.	, 403901H2		303390H2	105348H2
Employee No.:	Employee 1	ind Michael (1995) 4 1 10 20 10 10	Employee 2	Employee 2
,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	 FOI LAW EN	ROF	FICIAL USE ONLY	TIVE EXHIBIT /6

Page 1 of 2

C	APHENDIX A1 CELRL-IR 08-28
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	pie: Die:	į	41H	51H	6TH
	Comment		<ul> <li>1st: Simplisitic form; no lodging taxes. 2nd: It's unusual to list as a <u>SINGULAR</u>.</li> <li>"Apartment," instead of "Apartments," (PLURAL), or Multiple-Unit Dwelling. A SINGULAR Unit would more likely be a House For Rent. 3rd: It has the same address as <u>more</u> Bed &amp; Breakfast (above), although a different telephone no. 4th: This new telephone no. has a "502" Area Code (if e.Greater Lou. &amp; Wstm, KY area].</li> <li>by Reverse Search (Number). Also, Infospace.com, in particular "Superpages" for the Business</li> <li>Name to seek an address.</li> </ul>	Refer to above. Exact Same Except <u>Plural</u> : "Apartment <u>s</u> ." Important: This trip is a continuation of the prior trip. It is illogical that the "North Side" Business Name (especially if prepared on pre-formed company stationery) would "switch" from singular to plural on continuous stays: Prior = 4/18 thru 5/01; Current = 5/02 thru 5/18.	Similar to prior 4 items. However, note: 1. a "1" prefix for "502" Area Code. 2. Bil-ling Dated July 8, 2008 with a 06/22 "Arrival Date" & 07/07 "Checked Out" Date. Yet, appeared to have Paid-And-Stayed thru 07/07; thus, 07/08 Check Out. Again, the issue of a KY Area Code In an Indiana Business remains a concern.
CID Hottime - Travel or the guardines	Information Source:		switchboard.com by "Apartments", & by Reverse Search (Number). Also, Infospace.com, in particular "Superpages" for the Business Name to seek an address.	Refer to above. Exact Same Except Plural: "Apartment <u>s</u> ."	Refer to above. Much the same except a newer, larger, more bold and different Business Name Font.
CID Hotine - Tra Questionable Lodo	Phone No.				
	Name and Address of the Original Lodging Bill / Invoice:		North Side Apartment	North Side Apartments	North Side Apartments
ľ	Sign Date		05/04/05	05/20/05	0//1//0
	The TV No.		502106H2 Trav Vch 1 (	502106H2 Trav Vch 2	807378H2
<b>2010 86</b> (2010) 2010 2010 2010 2010 2010 2010 2010	Employee No.:	CONTRACTO DE LA SUBJECTION DE LA CONTRACTO DE LA CONTRACTÓ DE LA CONTRACTÓ DE LA CONTRACTÓ DE LA CONTRACTÓ DE L	Employee 2	Employee 2	Employee 2
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AFr eNDIX A2	CELRL-IR 08-28	CID Hotline - Travel Irregularities	Less Potential as Questionable Lodging
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		Name and Address of the				
Order / TV No.	Sign Date	Original Lodging Identity per Bill / Invoice:	Phone Number from Documentation:	Description	Comment.	Sam- ple:
Employee	1			(Secondary Series; Less Concern.)		
603526H2 TV 02	Repeat Below 11/9/06	Paducah Suites, 5135 Cairo Road, Paducah, KY 42001	270-442-4191		"paducahky@gmail.com", no lodging tax on last night, but on prior nights' lodging. Paducah Suites also Comfort Inn Paducah.	Ś
603474H2 TV 03	09/25/06	Paducah Inn and Suites, 5135 Cairo Rd., Paducah, 09/25/06 KY 42001	270-442-4191		Different format on lodging bill than above.	2ND
603474H2 TV 02	09/08/06	Ramada Limited Suites, 5135 Cairo Road, 09/08/06 Paducah, KY 42001	270-442-4191		Similar to above in lodging bill format.	3RO
603474H2 TV 01	08/18/06	Ramada Limited Suites, 5135 Cairo Road, 08/18/06 Paducah, KY 42001	270-442-4191		Similar to above in lodging bill format.	Ę
603526H2 TV 02	Repeat Above 11/9/06	Paducah Suites, 5135 Cairo Road, Paducah, KY 42001	270-442-4191	Appears as an "Overlap" Duplicate between Fiscal Year Folders; Not Presented Twice.	"paducahky@gmail.com"; no lodging tax on last night, but on prior nights' lodging. / Paducah Suites also Comfort Inn Paducah. Appears as duplicate of 1st Item, above.	21H
603526H2 TV 01		Paducah Inn and Suites, 5135 Cairo Rd., Paducah, 10/03/06 KY 42001	270-442-4191		Similar to some others. Okay.	6TH
1st conc	:LUSION:	1st CONCLUSION: Lodging receipt differences may be due to ownership changes.	s may be due to	o ownership changes.	×	

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AF- CNDIX A2 CELRI-IR 08-26 CID Holline - Travel Irregularities Less Potential as Questionable Lodging

Travel Order / TV No.	Sign Date	Name and Address of the Original Lodging Identity per Bill / Invoice:	Phone Number from Documentation:	Description:	Comment.	Sam- ple:
Employee	2			(Secondary Series; Less Concern.)		
403157H2 TV 01	07/14/04	07/14/04 St., Carrollton Inn, 218 Main	502-732-6905	Use of generic (Office Supply) type of Lodging Form: All sections were handwritten. I talked to a Mr. Frederick, the Innkeeping Host, or proprietor. He said he used these types of forms when he ran out of readrar ones.	Info at left was inconclusive. The proprietor had indicated his fax was not working; also, the web address was no fonger active. Management is done "Part-Time", phone message system allows forwarding to Guests Room Number, directly, by entering the extension (Same).	St
-			1		and a second second designment and a second s	
502794H2 TV 01	06/28/05	Carrollton Inn, 218 Main 06/28/05 St., Carrollton, KY 41008	502-732-6905	Use of a simplistic form, (no sales tax) which also did NOT align very well.	Info at left was inconclusive	2nd
504000H2 TV 02	11/16/06	Carrollton Inn, 218 Main 11/16/06 St., Carrollton, KY 41008	<u>502-732-6905</u>	Use of a simplistic form, (no sales tax), similar to above.	Info at left was inconclusive.	pre
504000H2 TV 01	10/15/05	Carrollton Inn, 218 Main 10/15/05 St., Carrollton, KY 41008	502-732-6905	Use of a simplistic form, (no sales tax), similar to above.	Info at left was inconclusive	4th
2nd CONC generic fo	SLUSION:	2nd CONCLUSION: Although the latter 3 were generic form (with no sales fax charged), all m	plain, simplisití av have been va	2nd CONCLUSION: Although the latter 3 were plain, simplisitic forms (with no sales tax charged) & the first was on an office generic form (with no sales tax charged) at may have been valid. Nonetheless, these were still included as minor concerns.	the latter 3 were plain, simplisitic forms (with no sales tax charged) & the first was on an office supply-type of x charged), all may have been valid. Nonetheless, these were still included as minor concerns.	

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EXHET 16

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# APT\_NDIX B1 CELRL-IR 08-28 CID Hotline - Travel Irregularities Estimated Potential Loss - Employee 1

Ⅳ (Travel Voucher) #	Sign Date	Original Lodging Identification	Comments	Daily Rate	Total Amount:
403901H2	07/28/04	Green River Apartments, Calhoun, KY 42327   Payable to	IMPORTANT: This is actually a different business. Please refer to "The Questionable Lodging" Spreadsheet [Appendix A1] for further details at Travel Voucher 403901H2 (very first item).	55.00	935.00
Estimated	Potential L	0\$\$			\$935.00
May be two	l o legitimate	e, inter-related businesses.		Minus:	935.0
Revised E	stimated P	otential Loss - Employee 1			\$0.0

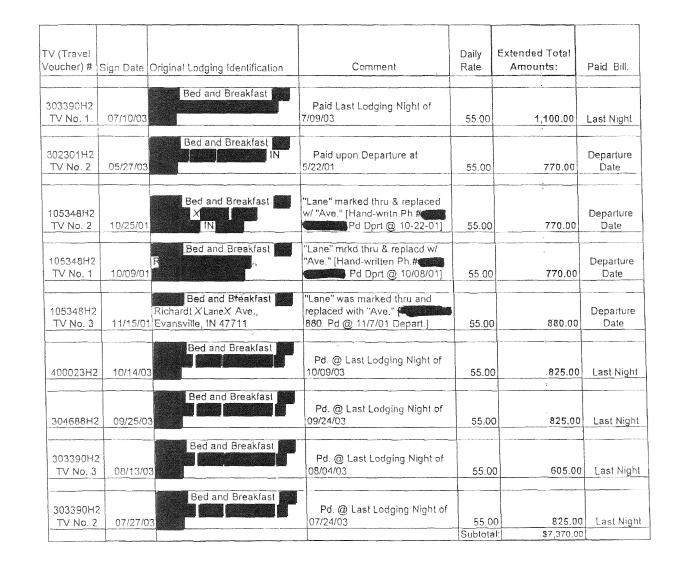
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# AF. CNDIX B2 CELRL-IR 08-28 CID Hotline - Travel Irregularities Estimated Potentilal Loss - Employee 2

TV (Travel Voucher) #	Sign Date (	Original Lodging Identification	Comment	Daily Rate	Extended Total Amounts:	Paid Bill:
303324H2	06/26/03	Bed and Breakfast Ave.,	Pd. @ Last Lodging Night of 06/19/03	55.00	825.00	Last Night
302301H2 TV No. 3	06/11/03	Bed and Breakfast Ave., <b>Structure</b>	Pd. @ Last Lodging Night of 06/04/03	55.00	770.00	Last Night
403539H2	07/26/04	Bed and Breakfast Ave.,	Pd. @ Last Lodging Night of 07/16/04	55.00	935.00	Last Night
402394H2 TV No. 2	05/27/04	Bed and Breakfast Ave.,	Paid upon Departure at 5/20/04	55.00	880.00	Departure Date
402394H2 TV No. 1	05/04/04	Bed and Breakfast Ave.,	Paid upon Departure at 5/04/04	55.00	1,155.00	Departure Date
400023H2 TV No. 03	1	Bed and Breakfast Ave.,	Pd. @ Last Lodging Night of 11/01/03	55.00	440.00	Last Nigh
400023H2 TV No. 02	1	Bed and Breakfast Ave.,	Pd. @ Last Lodging Night of 10/24/03	55.00	0 825.00	Last Nigl
502106H2 TV No. 1	-	North Side Apartment	SINGULAR Name for same address & New Phone # [Pd final nite 5/1/05]	55.0	0 770.00	Last Nigl
502106H2 TV No. 2		North Side Apartments Ave., 2000	PLURAL Name; same address & New Phone #: [[Pd.final nite 5/17/05]	55.0 Subtota		with a second se

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IV (Travel /oucher) #	Sign Date	Original Lodging Identification	Comment	Daily Rate	Extended Total Amounts:	Paid Bill:
404151H2	11/18/04	Bed and Breakfast Ave., Manual IN	Rate incr. frm \$55 to \$60. [Pd. Final Night 11/11/04]	60.00	240.00	Last Nigh
500057H2	10/08/04	Bed and Breakfast Ave., Markan IN	Incr frm \$55 - \$60; slight bill format chng. [Appeared as Paid on 10/4/04 Departure.]	60.00	385.00	Departur Date
501951H2 TV No. 4	06/09/06	North Side Apartments Ave., Ave., IN	Rate incr frm \$55 - \$60, [Pd. Final Night 6/7/06.]	60.00	600.00	Last Nigl
601951H2 TV No. 3	05/31/06	North Side Apartments Ave., North Side IN	Rate incr frm \$55 - \$60. [Pd. Final Night 05/28/06.]	60.00	840.00	Last Nig
601951H2 TV No. 2	05/16/00	North Side Apartments Ave., Manual IN	Rate incr frm \$55 - \$60. [Pd. Final Night 05/14/06.]	60.00	840.00	Last Nig
601951H2 TV No. 2	05/05/0	North Side Apartments	Rate incr frm \$55 - \$60, [Pd, Final Night 04/30/06.]	60.00	770.00	Last Nig
500049H;	2 10/17/0	North Side Apartments Ave., IN	Lodging Bill Appeared To Be Annotated to Correct the Dates on it to Match w/ the Travel Voucher: <u>3Nites ~ 10/11-13 w/</u> <u>10/14 payment/departure</u> was hand changed so as to read as <u>4Nites ~ 10/10-13 w/ 10/14</u> <u>payment/departure</u> .	55.0	0 220.00	Departu Date
600103H	2 11/15	North Side Apartments	Paid on the Final (Last) Night, or 11/09/05.	55.0 Subtota		

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CID Hotline - Travel Irregularities CID Hotline - Travel Irregularities Estimated Potential Loss - Employee 2

TV (Travel Voucher) #		Sign Date Original Lodging Identification	Comment	Rate Rate	Extended Total Amounts:	Paid Bill
705332H2	÷		Higher Daily Rate of \$60.00. [Paid on the Final (Last) Night, or 5/15/07]	60.00	1,800.00	Last Night
			Even Higher Daily Rate of \$70. The "Overall Font" and billing	· · · · · · · · · · · · · · · · · · ·		
807378H2	07/17/08	North Side Apartments Ave., Ave., IN	style is somewhat different from the previous billings. {Paid on the final lodging nite: 07/07/08]	70.00	1,120.00	Last Night
				Subtotal	\$2,920.00	
PRIMARY (	PRIMARY OBSERVATION	IQN:		GRAND		
Estimated Loss	055 ~	Potential Irregularity in Lodging Costs	Costs	TOTAL	\$22,215.00	
				Subject t	Subject to further Verification / Validation	/ Validation.
SECONDA	SECONDARY OBSERVATION:	IVATION:		# of Times	S:	
		Traveler Paid Bill Upon Departure Date	re Date	æ		
		Traveler Paid Bill Upon the Last Night	Night	20		
		والمنابع المراجع	Total Occurrences	5		
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