



NEW HAMPSHIRE

Department of Justice

Office of the Attorney General

Charitable Trusts Unit

Report of Findings Warren Wentworth Ambulance Service

**Michael A. Delaney
Attorney General**

**Anthony I. Blenkinsop
Director of Charitable Trusts
February 29, 2012**

TABLE OF CONTENTS

TABLE OF CONTENTS	Page 2
INTRODUCTION	Page 3
AREAS OF INVESTIGATION AND FINDINGS	
GOVERNANCE	Page 4
BANKING	Page 9
FINANCIAL MANAGEMENT	Page 12
OTHER MATTERS	Page 22
REMEDIAL ACTION AND OVERSIGHT	Page 24

ATTACHMENTS:

Attachment A – Comparative Balance Sheet and Income Statement (2007-2010)

Attachment B – Compensation by Year (2007-2010)

INTRODUCTION

I. COMPANY

Warren Wentworth Ambulance Service (WWAS) is a charitable 501 (c) (3) corporation providing ambulance services to Warren, Wentworth, and Grafton County. It has volunteer members and employees who provide 24 hour emergency medical aid to individuals regardless of ability to pay. WWAS also provides hospital-to-hospital transports and ambulance coverage at certain public events, such as local race tracks.

WWAS received its IRS 501 (c) (3) determination letter on December 23, 1983. The organization registered with the Secretary of State as a nonprofit corporation on April 11, 2000, and registered with the Charitable Trust Unit (CTU) on March 27, 2003 (registration number 14530). The most current Articles of Agreement are dated April 3, 2000, and the most recent by-laws are dated May 22, 2000. The organization has a draft version of revised by-laws (dated March 20, 2011) which has not yet been reviewed or voted on by the members.

WWAS receives funding from various sources including the towns of Warren and Wentworth, third party insurance payments from private insurers, Medicaid and Medicare, fundraising activities, and payment for ambulance coverage at race tracks.

II. PURPOSE OF INVESTIGATION / SCOPE OF REPORT

The CTU received a complaint in December, 2010 from a member of WWAS regarding the organization's business practices. In January, 2011 the CTU sent a letter to WWAS requesting various reports and documents. A partial response was received in May, 2011. In July the CTU began investigating the organization and the issues outlined in the original complaint.

The initial CTU draft report was presented to the officers of WWAS and their attorney on November 29 and again on December 22, 2011. To our knowledge the findings presented in this report are not disputed.

The purpose of this investigation and report is to examine the business practices and governance of WWAS as they relate to its operation as a non-profit entity. This report does not concern the provision of ambulance services by WWAS.

INVESTIGATION AND FINDINGS: GOVERNANCE

Note: Observations are based on a review of board minutes (2004-2011), corporate by-laws, articles of incorporation, the current and proposed policy and procedures manuals, and interviews with the current Board President.

I. INVESTIGATION - GOVERNANCE

A. Articles of Agreement/By-laws

The Articles of Agreement identify six categories of membership and each has associated requirements and privileges. All members may attend any meeting of the Board of Trustees (Board). Members can be expelled at any time by a two-thirds vote.

The By-laws state that, among other duties, the Board establishes a budget, determines the duties of the officers and employees, selects officers, assures all required filings are completed, hires staff and professionals as needed, creates committees, borrows money, purchases/disposes of assets, opens bank accounts, determines signatory authority, and authorizes contracts.

The By-laws identify six officers in total, each to hold office for one year and thereafter until their successor is chosen. The positions are President, Treasurer, Clerk and Assistant President, Assistant Treasurer and Assistant Clerk. Positions for assistants can remain vacant until the Board fills them. Officers can be removed by a 2/3's majority vote.

B. Conflict of Interest Policy

The policy states that members must disclose any conflict of interest to the Board as a matter of record. The policy further states that WWAS may purchase goods and services from a Member (or immediate family of such) as long as the transaction complies with all New Hampshire law, and with the charity's policy. The policy states that WWAS will maintain a list of each transaction which benefits a member including name and amount of benefit.

C. Members

The Board of Directors (the voting members) consists of active on-call, active non-call, and active non-licensed members. The by-laws state that 40% of the trustees present at a meeting represents a quorum. Board President Brian W. Clark (BWC) states that there are currently 18 members, and that quorum is determined at each meeting. The meeting minutes do not reflect the determination of quorum. The minutes available for review for years 2004 – 2011 show an average of twelve people present, with a range of 8-17.

The minutes state that the Board intended to meet monthly until March, 2009, at which time they voted to meet bi-monthly. The following summarizes the meeting minutes that were available (or missing) for review:

2004 – Jun - Oct, and Dec (missing annual meeting and six regular meeting minutes)

2005 – Jan – Oct (missing annual meeting and two regular meeting minutes)

2006 – May, Jun, Aug, Nov, Dec (missing annual meeting and seven regular meeting minutes)

2007 – Feb, Apr, Aug, Oct (missing annual meeting and eight regular meeting minutes)
2008 - Nine regular and annual meeting minutes available (missing Apr, Sep, Oct)
2009 – Jan, Feb, Mar, May, Jul, Sep, Nov and annual minutes available (none missing)
2010 - May, Jun, Jul, Sep, Nov, Dec and annual meeting available (missing Jan and Mar)
2011 – Jan, Mar, May, Jun, Jul, and annual meeting minutes available (none missing)

D. Monthly Treasurer’s Report

The treasurer’s reports presented at board meetings were not available for review. According to BWC, the treasurer hands out an income statement at each meeting. After it is reviewed, the reports are collected and shredded. In a review of 58 meeting minutes, it was noted that the treasurer was not present 75% of the time, and there was no financial report presented 24% of the time. The minutes reviewed made no mention of an annual budget ever being presented or voted on.

The minutes from August, 2008 and March, 2010 show that members were not satisfied with the level of financial reporting provided. The minutes report heated discussions and votes to have the treasurer’s report expanded and to present the report with an overhead projector. (Further discussion on the treasurer’s position is included in Section E below)

E. Annual Meetings/Election of Officers/Annual Reports

The by-laws require an annual meeting be held in July for the election of officers, the presentation of the annual reports from the president and treasurer, and other business. The minutes from these meetings were available for four of the eight years reviewed.

1. Nomination of Officers

A nominating committee is appointed each year prior to the annual meeting. The committee presents a slate of officers which members then vote on at the annual meeting. BWC reported that WWAS’ goal is to have three people on the nominating committee who have been members for at least six months. He states that it is a challenge to get volunteers to run for office or serve on the committee. At various times the slate of candidates has included members of the nominating committee.

From 2004 through July 2005 the minutes show WWAS member Claudia Anderson as treasurer. Since that time the organization has not had a duly elected treasurer; however, Marie Spencer (MS) has been assigned the title. MS is not a member of the organization, and consequently cannot serve on the Board or vote. She is paid to provide bookkeeping services and does not attend board meetings.

2. President and Treasurer’s Report

The annual meeting minutes reviewed state that BWC did present an annual report on the status of the organization as required by the by-laws. There was however no evidence of an annual treasurer’s report which is also required by the by-laws.

F. Officers – Terms and Duties

The by-laws assign the typical duties to the board and its officers, and there are no term limits. The duties of the treasurer are described in detail (Article IV, Section 4) and include the following:

- Shall have custody of the funds
- Shall deposit all money of the Corporation
- Shall maintain an accounting of all assets
- Shall disburse funds as required with proper vouchers for such disbursements
- Shall keep full and accurate accounts of receipts and disbursements
- Shall render an accounting of all transactions and of the financial condition at annual and regular meetings

G. Board Development

The review of WWAS' meeting minutes provided no evidence of board training for new or existing members. There was no mention of any program or process to orient members to their duties as a trustee. As noted above, the organization has had little turn-over in key leadership positions. For example, the President has served for seven years, and there has been no member serving as treasurer since at least 2005.

H. Review of Meeting Minutes

WWAS does not maintain a formal board book complete with meeting minutes and reports. As a result many minutes were unavailable, anywhere from 3 (in 2005) to 9 (in 2007). The following identifies some of the significant topics discussed in the minutes reviewed.

1. Stipends/Compensation

In January, 2005 the members began to consider paying themselves a stipend to defray the costs they incurred as volunteers. In February, 2005 the Board reviewed the program used by Campton-Thornton Ambulance Service. The minutes note a discussion on bookkeeping requirements, eligibility and the need for legal counsel. In April, 2005 a stipend plan was approved, and procedures were adopted in June. Stipends paid to members are reported as income on federal 1099 forms.

The July 2008 minutes state “the stipends plan is not working as intended.” The minutes state that the plan was costing more than the organization could afford, and the intended benefit of motivating people to comply with WWAS procedures was not happening.

In December, 2010 a special meeting was held to vote on modifications to the stipend program, and this version remains in effect.

In October, 2007 the “New Business” portion of the minutes report a discussion on hiring a paramedic. It was decided that another meeting was needed to work out the details, including the possibility of hiring more than one paramedic. No further discussion or vote was noted in the minutes provided until February, 2008 when the first employee, Steve Czarneki was hired.

2. Payment to Board President BWC

In July, 2005 the Board voted to give \$1,000 to BWC as payment towards the repair of his personal vehicle. (See Section I below)

3. Annual Meeting/Vote on Officers

The annual meeting minutes document the process for the election of officers. The Nominating Committee presents a slate of candidates at the annual meeting. Discussion follows, and when general consensus is reached the secretary is instructed to “cast the vote for the slate as proposed” and thus the officers are elected. There is no direct vote by each member for each candidate.

4. Re-structuring

In February, 2007 BWC presented a proposal to run WWAS as a business with a paid director running the day-to-day operation. A proposal was to be presented at the next meeting, but the issue was not mentioned again in the minutes provided.

I. Swift Water Rescue Equipment

WWAS board member Patrick Griffin (PG) began attending meetings at WWAS in May of 2008. In December of that year he proposed the idea of a swift water rescue program for WWAS. BWC agreed to have WWAS purchase the necessary equipment. There was no record of Board discussion or approval of this decision documented in the Board minutes provided. The level of investment required for this endeavor was sizeable and PG donated \$17,200 to WWAS for this purpose. Protective rescue jackets, a boat, and other equipment were purchased with these funds. At present, the charity is no longer in possession of some of these assets which are being held by PG.

J. Conflict of Interest

This review noted two transactions that represent conflicts of interest.

1. Personal Vehicle Repair Costs

In July, 2005 the Board voted to give BWC \$1,000 for repairs to his personal vehicle. The mechanical failures were caused by factors unrelated to his association with WWAS.

2. Family Member Compensation

Marita Clark (MC) is the daughter of Board members BWC and Eileen Clark. In 2010 MC received \$1,700 in compensation (reported on federal form 1099) for cleaning the WWAS station. There is no record in the minutes of notification to the Board, discussion, or a vote to approve this decision as required by the organization’s conflict of interest policy. (Note: MC also received payments in 2008 and 2009, but the amounts were below the \$500 minimum established by the WWAS conflict of interest policy.)

II. FINDINGS - GOVERNANCE

A. WWAS Board

1. Failed to maintain complete corporate records including an annual listing of officers and board members, meeting minutes, board votes, and reports presented to the Board.
2. Failed to perform their fiduciary duties including the duty to:
 - a. Elect a duly qualified treasurer.
 - b. Verify and make certain that the duties assigned to the treasurer were performed.
 - c. Provide financial oversight, to include regular review of WWAS' financial condition, approval of an annual budget, and review of an annual financial report.
 - d. Consider the financial feasibility of new proposals (such as the stipend program, the hiring of employees, and the swift water rescue plan) prior to their approval.
 - e. Review and approve corporate agreements such as reimbursement contracts with health insurance carriers.
3. Failed to comply with of their Articles of Agreement (Article IV, Section B), their Conflict of Interest Policy, and New Hampshire RSA 7:19a, regarding transactions that involve conflicts of interest.
4. Failed to provide board training and leadership development.
5. Failed to properly report the \$1,000 payment to BWC as personal income.

B. Other

Based on the information provided, it appears that the plan to implement a swift water rescue program failed to follow any established or reasonable procedures for initiating a new program, accepting a large donation, and purchasing equipment. The decision appears to have been made by BWC without Board review or approval. A significant amount of money was committed to a program without a needs assessment, and without an analysis of the program's on-going financial requirements for training and equipment. The manner in which the transactions were conducted lacks transparency. At present the ownership of the equipment purchased is at question, and WWAS is not in possession of the assets.

INVESTIGATION AND FINDINGS: BANKING

Note: Observations are based on review of bank statements, check registers, and interviews with Board President BWC, and bookkeeper MS.

I. INVESTIGATION - BANKING

A. Review of Bank Accounts

(All bank accounts are with Woodsville Guaranty Bank)

1. Hi-Fi Account (# 317)

Established to accumulate funds for equipment and to earn higher interest on cash balances.

Balance as of 08/01/11 - \$13,798.18

Signing Authority: BWC, MS, Claudia Anderson

Reviewed statements from January 2004- August 2011

Three statements missing (April 2010, July 2010, April 2011)

2. Education Fund (# 475)

Established in November 2007 to accumulate funds earned from trainings, with the intent to use the funds for mandatory member training.

Balance as of 12/31/09 - \$1,907.79

Signing Authority: BWC, Eileen Clark, Claudia Anderson

Reviewed statements from November 2007 – December 2009

Missing Statements for 2010 and 2011 (20 months)

3. Savings Account (# 613)

Established to accumulate funds for the “Jaws of Life”

Balance: 08/01/11 - \$188.08

Signing Authority: BWC, Eileen Clark, Claudia Anderson

Reviewed statements from December, 2005 - August 2011

Missing Statements: None

4. Payroll Account (#490)

Established on January 7, 2010

Balance: 07/29/11 - \$2,477.63

Signing Authority: BWC, MS, Eileen Clark, Claudia Anderson

Reviewed statements from January 2010 – July 2011

Missing Statements: None

5. Main Account (#465)

Most WWAS transactions go through this account, including revenue deposits, and payments for expenses (excluding payroll)

Balance: 06/20/11 - \$1,670.88

Signing Authority: BWC, MS, Eileen Clark, Claudia Anderson

Missing Statements: None

II. FINDINGS - BANKING

A. Record Retention

Bank statements were missing for months, and in some cases years, for most of the accounts and copies had to be requested from the bank for this review. While the bank was able to provide most of the statements requested, the summary above notes those that remain missing and unavailable from the bank.

B. Bank Charges

A large number of bank charges related to overdrafts in the main account were noted. Total charges for the three year period from 2008-2010 were \$2,150 and involved 59 events. A search for additional costs charged by vendors for late payments and returned checks was not included in the scope of this review; however, it appears that disconnect notices were issued by utility and phone companies, and interest and late fee charges were incurred on corporate credit cards. While the greatest number of overdrafts occurred in 2008 and 2009 (24 events in each year), five overdrafts were noted in the first six months of 2011.

C. Electronic Payments

WWAS uses electronic fund transfers (EFT's) and point of sale (POS) transactions for a large number of payments (12-20 per month). These transactions are used for cash withdrawals, purchases at gas stations, and for use at consumer retailers such as Lowe's, Shaw's, Sam's Club, Wal-Mart, and Staples. There was no evidence of Board authorization for electronic payments, nor was there evidence of bank reconciliations, or matching authorization and receipts to the bank statements.

In an environment with weak internal controls, POS transactions should be avoided, and EFT payments limited to Board-approved, regular monthly transactions such as mortgage and loan payments.

D. Lump-sum Withdrawals

WWAS issues checks, at times for several hundred dollars, payable to "Cash" or to an individual. There was no evidence of subsequent receipts provided for the purchases, or a deposit made for remaining funds subsequent to the purchase. Related to this practice is the lack of a petty cash system. Implementing a petty cash system with proper controls and oversight would address the occasional need for cash and eliminate the need for lump-sum cash advances.

E. Authorized Signatures

WWAS does not require second signatures on checks, regardless of the amount. Certain members who are not officers have signing authority on accounts, including BWC's spouse. The bookkeeper, who is neither an officer nor a member, has signing authority for the payroll and main accounts.

F. Number of Bank Accounts

WWAS currently has five bank accounts. This is a large number of accounts for a small organization that is operated by volunteers with little experience in bookkeeping. As noted above, many bank statements were missing. There was no evidence of account reconciliations

being done. Overdraft fees have occurred frequently, at times with adequate funds in other accounts.

The organization's accounting systems would be simplified by reducing the number of bank accounts, implementing monthly payroll and stipend payments, improving purchasing practices, and establishing a petty cash account.

INVESTIGATION AND FINDINGS: FINANCIAL MANAGEMENT

Note: Observations are based on review of balance sheets, income statements, bank records, check registers, federal filing documents, and interviews with Board President BWC, and bookkeeper MS. WWAS member/volunteer Vicki Swan was contacted for information regarding the WWAS Penny Social fundraising event.

I. INVESTIGATION – FINANCIAL MANAGEMENT

A. WWAS Financial Statements

(Financial statements for WWAS were provided by MS for years 2007- 2010. See Attachment A – Financial Statements)

1. Balance Sheet Reports

WWAS' assets include the building and its improvements, ambulances, furniture and fixtures, and equipment. Liabilities include a mortgage (\$57K) and vehicle loans.

The balance sheet reports prepared by MS fail to record these assets and liabilities properly and contain so many errors, omissions and inconsistencies (see below) as to be unreliable.

Errors Noted:

- a. The CD Bank Account, which was closed in April, 2005, is reported on the balance sheet with a balance of \$4,870 for years 2007-2011.
- b. The Hi-Fi Bank Account is shown with the same balance (\$18,339) for years 2007-2010. Actual bank statements for this period show a positive balance at each year end (\$2,026 in 2007; \$2,039 in 2008; and \$546 in 2009 and 2010).
- c. Accounts Receivable balance is reported with a negative balance for each year and with the same balance (\$11,600) for years 2009 and 2010.
- d. The assets include a "Combined Deposit" account with the same negative balance of \$24,792 each year. This review was not able to determine what this account is intended to represent.
- e. The building, equipment, vehicles and other fixed assets are not included on the balance sheet.
- f. Liabilities include the mortgage, reported with the same balance of \$77,220 each year. The current balance, according to the bank is \$57K.
- g. The outstanding balances on the vehicle loans are not reported as liabilities.
- h. The equity balance reported each year implies that WWAS' liabilities exceed assets by nearly \$100,000.

2. Income Statements

WWAS receives income from insurers (Medicaid, Medicare and third party payers) for services provided. They also receive town support and earn income by providing ambulance coverage at car races. In addition, WWAS raises money through fundraising events throughout the year.

Their primary expenses include payroll and stipends, workmen's compensation insurance, and maintenance and fuel for the ambulances and building.

As with the balance sheet, the income statements prepared by MS for years 2007-2010 do not appear to be accurate.

Errors Noted:

- a. Payments on debt are recorded as an expense rather than a reduction of liabilities.
- b. Payroll amounts do not agree with wages on Federal W-2 and 1099 forms.
- c. Employer payroll taxes are not recorded as an expense.
- d. Equipment purchases and building improvements are listed as expenses rather than as assets.
- e. Depreciation expense is not recorded.
- f. The statements report operating losses ranging from \$5K-\$17K per year.

3. Adjusted Net Income

In an effort to determine a more reasonable estimate of WWAS' financial position, the net income (loss) reported by WWAS was adjusted. Loan payments recorded as an expense were reduced by half (assuming half of each payment was interest expense and half a reduction of debt). With this adjustment WWAS appears to have net income for most years (between \$3,000 and \$9,000 for years 2007-2009) and a small loss (\$2,700) in 2010.

Cash balances as of December 31, 2010 (per the bank statements) totaled \$12,000. Regular monthly payments were observed each year on the mortgage and ambulance loans. WWAS has more than 50% equity in their building. Based on these observations, it appears that the adjusted estimates of operating income are a more accurate indication of operating results for the periods discussed.

B. Income – Payment for Services

WWAS receives payment from third party insurers and from uninsured individuals for emergency services and patient transports. Billable services are reported electronically through the NH Trauma Emergency Medical Services Information System (TEMSIS). WWAS' billing company (Comstar) has access to this information and bills providers applying WWAS' annual contract rates. WWAS records income when payment is received. Insurance income was \$69K in 2007 and increased to \$248K by 2010, a 250% increase. The largest annual growth was in 2008 with a reported increase of 90% over the prior year.

C. Income – Fundraising Events and Donations

WWAS holds three or more fundraising events each year. Total revenue from all events is typically \$7K - \$10K (years 2007-2010). Donations are received through-out the year and vary in amounts. The average for years 2007-2010 was \$5.5K.

1. Lobster Bake

The Lobster Bake is held annually in July and is part of Warren Old Home Days. Tickets are sold in advance for a lobster dinner prepared by WWAS members. The lobsters are picked-up

in Maine, and other supplies and food items are typically purchased at Sam’s Club. Information on income and expenses was available for the four years summarized below.

	2007	2008	2009	2010
Revenue	\$4,575	\$4,712	\$5,225	\$3,294
Less Expenses:				
Lobsters	\$4,151	\$3,164	\$3,495	\$3,032
Groceries/Supplies	\$1,379	\$ 754	\$1,121	\$ 500
Gas (auto)	\$ 184	\$ 279	\$ 0	\$ 0
Net Profit/(Loss)	(\$1,139)	\$ 515	\$ 609	(\$ 238)

2. Penny Social

This event is held annually in November. According to the event organizer, there are six or seven aspects to the event and it is WWAS’ biggest fundraiser, bringing in \$3K - \$4K each year. The event is held at the local school and includes various raffles such as:

- a. Yard sale items
- b. Donations from community businesses
- c. Donated/hand-made items such as quilts
- d. Other – The Penny Social includes homemade baked goods for sale, “50-50” tickets, and other raffles as available in any given year.

3. Fundraising – Other

The minutes mention an annual pie sale held in the spring. The financial statements show income of \$968 in 2009 and \$372 in 2010 from this event. There was a “Hanger Fundraiser” in August, 2009 that reported raising \$1,400. Quarterly dinners were mentioned in the minutes as a possible future event.

4. Donations

Donations and the donor are typically noted in the Board meeting minutes. WWAS reported the following amounts received:

- 2007 - \$ 5,938
- 2008 - \$13,555
- 2009 - \$ 1,500 *
- 2010 - \$ 1,300

In 2004 a \$2700 donation for a Stryker stretcher was made. In 2005 WWAS received a \$2,000 donation for the new ambulance and a \$1,000 unrestricted donation. In 2008 they received an \$11,000 anonymous donation, and in 2009 \$6,200 was donated (although not recorded as a donation).

** See Section II, Findings – Financial Management, Item C regarding the 2009 reporting of donations.*

D. Income - Race Track Coverage

WWAS provides ambulance coverage at local race tracks. The following summarizes revenue by year (based on review of the deposit detail report).

Year	Legion Race Track	Canaan Lions Club Race Track	Pines Race Track	Big Daddy Speedbowl	Total
2007	\$3,250.00	\$0.00	\$1,750.00	\$0.00	\$5,000.00
2008	\$6,100.00	\$14,000.00	\$0.00	\$0.00	\$20,100.00
2009	\$2,480.00	\$16,000.00	\$0.00	\$0.00	\$18,480.00
2010	\$0.00	\$16,000.00	\$0.00	\$11,850.00	\$27,850.00
Total	\$11,830.00	\$46,000.00	\$1,750.00	\$11,850.00	\$71,430.00

% by Race Track by Year

Year	Legion Race Track	Canaan Lions Club Race Track	Pines Race Track	Big Daddy Speedbowl	Total
2007	65.0%	0.0%	35.0%	0.0%	100.0%
2008	30.3%	69.7%	0.0%	0.0%	100.0%
2009	13.4%	86.6%	0.0%	0.0%	100.0%
2010	0.0%	57.5%	0.0%	42.5%	100.0%

Race track revenue contributes 7-10% of total WWAS income. Members are compensated for working the races, and the amounts vary by race track. For example, coverage for Big Daddy races pays \$10/hour per evening, while coverage at the Canaan track pays \$100/person/day.

E. Compensation for Employees and Member Volunteers

There are three activities for which WWAS member volunteers receive compensation. They receive a stipend for responding to 911 calls. They are paid varying amounts for coverage at local races (See Section D above). They are also paid for providing hospital-to-hospital transfers for patients, based on a rate schedule for each hospital. Member compensation (in excess of \$600 per year) is reported on federal 1099 Forms.

Employees are paid an hourly rate for coverage at the station and receive W-2 forms for wages earned.

1. Stipends

WWAS approved the first stipend payment plan for member/volunteers at the April, 2005 board meeting. Subsequent meeting minutes reflect discussions regarding the financial impact, problems, and approved changes. In December, 2010 the plan was modified to its present form. Members are currently paid a \$10 stipend for responding to 911 calls.

2. Transfers

WWAS has contracts with various hospitals to provide hospital-to-hospital transfers. The income WWAS earns for a transfer varies depending on the hospital, distance, and the medical needs of the patient. Employees who cover transfers are paid their regular hourly rate.

Member/volunteers who perform transfers are paid based on the rate established for that hospital, and the volunteer's duties (paramedic, driver, or intermediate). For example, a paramedic responding to a transfer from Lakes Region Hospital to Keene would receive \$200, and the driver would be paid \$100.

3. Employees

WWAS began hiring employees in 2008 because the organization was unable to provide 24-hour coverage 7 days/week with volunteers. Currently there is one full-time employee and four part-time employees. These five people work 24-hour shifts at the station. It is not clear if they are considered members with voting privileges, but two have not attended any board meetings, and others have attended only one or two (based on meeting minutes available).

(See Attachment B for a summary of compensation and stipends paid by year.)

4. Authority to Compensate Member/Volunteers

As part of this review, the organization's Articles of Agreement and By-laws were reviewed to determine what restrictions were placed on member compensation.

a. WWAS Articles of Agreement

Article IV, Section B of the Articles states:

"No part of the net earnings of the corporation shall inure to the benefit of any director, officer, or private individual, except that reasonable compensation may be paid for services rendered to or for the corporation which affect one or more of its purposes."

b. WWAS By-laws

Article III, Section 2 (Duties of the Board), item C states:

"The Board shall determine the compensation and duties (in addition to those imposed by law and by these by-laws) of the Officers, employees, and agents of the Corporation."

Article III, Section 3 (Powers of the Board), item B states:

"The Board may hire, supervise and discharge such employees, agents and professional advisors as the Board may determine necessary and/or desirable for the conduct of the affairs of the Corporation."

Article III, Section 7 (Compensation), states:

"Trustees shall serve without compensation except for reimbursement of actual authorized expenditures on behalf of the Corporation."

c. Conclusion

Based on a review of the above, this report concludes that the Articles and By-laws of WWAS allow the Board to authorize compensation, for both members and employees, for performing duties determined and assigned by the Board. The documents do not allow for compensation for serving as trustees of the corporation.

F. Other Expenses

Most non-payroll related expenses were found to be repetitive and reasonable, including interest, insurance, utilities, diesel fuel, medical supplies, and training. There were however a large number of transactions with vendors that were of concern for the following reasons:

1. Types of products and services provided by the vendor
2. Lack of receipts and/or authorization for purchases
3. Payments frequently made using POS or EFT electronic transactions

The schedule below summarizes the amounts by vendor by year.

Retailer	2007	2008	2009	2010	Total	% Total
Sam's Club	\$2,478	\$4,797	\$7,982	\$2,265	\$17,522	41.9%
Home Depot	\$292	\$790	\$4,079	\$3,513	\$8,675	20.7%
Staples	\$1,490	\$2,175	\$1,632	\$1,444	\$6,741	16.1%
Gas	\$335	\$894	\$334	\$1,331	\$2,894	6.9%
Best Buy	\$0	\$411	\$364	\$217	\$992	2.4%
Cash	\$430	\$0	\$40	\$410	\$880	2.1%
Lowe's	\$29	\$183	\$320	\$338	\$870	2.1%
Office Depot	\$0	\$552	\$201	\$0	\$753	1.8%
Hannaford	\$9	\$305	\$365	\$58	\$737	1.8%
Wal-Mart	\$0	\$101	\$109	\$419	\$630	1.5%
Shaw's	\$44	\$0	\$247	\$138	\$429	1.0%
Fast Food	\$114	\$86	\$66	\$122	\$387	0.9%
Kohl's	\$0	\$306	\$0	\$0	\$306	0.7%
Total	\$5,221	\$10,601	\$15,738	\$10,256	\$41,816	100.0%

It was noted that WWAS does have a need to purchase food and supplies. Most of their fundraisers involve food and spaghetti dinners are provided at some of the monthly trainings. Likewise there are maintenance costs at the station and a need to purchase gas on long distance transfers. However, the high volume of small-dollar transactions coupled with a lack of authorization or receipts indicates weak internal controls and an opportunity for misuse of funds.

G. Federal and State Reports

A review of the State of NH Annual Reports and the Federal Form 990's revealed various problems. The reports have consistently been late. Years 2003 through 2008 were all filed in June, 2009. The 2009 report was essentially filed on time. The 2010 report was due May 15, 2011 and remains outstanding. The officers listed on the reports filed do not correspond with those reported in the board minutes. The financial information reported is not consistent with internal reports, and the fund balance fails to roll-forward from one year to the next. Similarly, fixed assets and accumulated depreciation also fail to roll-forward and reconcile year-to-year. Asset accounts include categories with negative balances. All of the Form 990's reviewed appear to require amended filings to correct reporting errors.

H. Bookkeeping Services

1. Payment of Services

MS is paid to perform bookkeeping duties for WWAS. As noted in the Governance section of this report, she is also the designated Treasurer although she cannot hold this position. Her duties vary, but include accounts payable and payroll, entering transactions into the accounting system, reconciling bank statements, and filing state and federal payroll and corporate reports. She has check-signing authority on most of WWAS bank accounts, including payroll and the main account. The following summarizes WWAS payments for bookkeeping services:

2008	\$ 530.00
2009	\$ 887.15
2010	\$2,279.30
2011	\$1,562.30 (YTD July)

The payments for bookkeeping services did not appear excessive. In discussions with BWC he noted that MS volunteers all of her time. He was informed that regular payments were made for her services via checks signed by her. BWC reviewed the bank statements and confirmed that this was correct, but again stated that he had not been aware of the payments. As with other transactions reviewed, this represents a lack of proper oversight.

2. Reliability of Bookkeeping Services Provided

In general, WWAS is lacking in internal controls, financial oversight, and proper segregation of duties. It is not clear which accounting functions are performed by WWAS (BWC) and which are performed by MS. As noted above, the financial statements contain many significant errors. State and federal annual reports contain factual errors and are not filed on a timely basis. The current assignment of duties is not producing reliable information or satisfying legal requirements.

In a letter dated December 13, 2011 WWAS stated, through its attorney, that the errors contained in the financial statements prepared by MS “were under review and will be appropriately addressed.” To date, no explanations or revised statements have been provided to this office.

II. FINDINGS – FINANCIAL MANAGEMENT

A. Income – Payment for Services

1. WWAS records income when payment is received, instead of following accrual accounting principles by recording income when it is earned (billed).
2. WWAS has no mechanism for tracking and collecting outstanding payments that are past due, or for recording bad debts.
3. Comstar bills providers at one rate for each service, regardless of the insurer. WWAS receives payment at various rates, depending on the negotiated allowance with different insurers. There is no mechanism in place for WWAS to confirm that payments received are at the negotiated rates.
4. Annual rates are negotiated by one person (BWC). The agreements are not reviewed or approved by the Board or a Board-appointed committee. BWC reported that for this year's contract with BC/BS he agreed to bill at the Medicaid rate. This agreement is considered to be a significant disadvantage for WWAS since private insurers typically pay higher rates for services than Medicaid.

B. Income/Fundraising – Lobster Bake

1. WWAS buys the lobsters in Trenton, Maine (500 miles round-trip). It would be more cost-effective for WWAS to purchase the lobsters from a local vendor. Quality control does not appear to justify this expense.
2. The auto fuel charges for the 2007 and 2008 event are excessive. (Note: Gas expense for 2009 and 2010 was not reported.) Mileage reimbursement should be for miles traveled, not for multiple "fill-ups" at the gas station which these expenses represent. Expected fuel costs for a 500 mile trip would be under \$100.
3. It was reported that extra lobsters are typically ordered for a member-party after the event. This was not confirmed; however to the extent this does occur, it would impact the profitability of the fund-raiser.
4. The four years reviewed show a combined net loss of \$250. The purpose of this event may be more related to community relations and support of Old Home Days; however, addressing the issues noted above would likely ensure some level of profitability each year.
5. The Board minutes provide little information about the event. The minutes should include more detail, or a separate report should be submitted to the Board for their review. This would allow the Board to evaluate the cost/benefit of the event, and have data available for planning purposes the following year.
6. The 2008 event has discrepancies between the income reported and the bank deposits. The Board minutes report the following:

June 2008 minutes – Dinners will sell for \$20/plate

July 2008 minutes – 280 tickets were sold and the event was profitable

From these minutes, it appears that \$5,600 was raised; however, the Deposit Detail report shows three deposits for this event totaling only \$4,712.

Given this discrepancy, it appears that the Board minutes were incorrect, \$888 of revenue was misclassified, or the money was lost or stolen.

C. Income – Donations

The 2009 income statement reports donations of \$1,500. The WWAS Detail Deposit report shows 2009 donations totaling \$8,700. The \$6,200 difference was included in the bank deposit of 03/17/09 but appears to be missing, or misclassified in the income statement. This type of error would normally be corrected during the reconciliation of the bank statements. This report concludes that bank reconciliations were not done, and the \$6,200 is unaccounted for.

D. Expense – Compensation for Employees and Member Volunteers

1. Federal Reporting Requirements

WWAS failed to comply with Federal reporting requirements for non-employee compensation (reported on Federal Form 1099) by failing to file annual reports on time for at least years 2007-2008 (earlier years were not reviewed).

2. Compensation to Clark's

The Clark family, including Board President BWC, his wife, and two adult children received a total of \$44,478 in reported earnings for years 2007-2010. This amount represents 65% of the total non-employee compensation (stipends, transfers, and coverage at racetracks) reported by WWAS during this four year period. No other member's earnings approach the amount earned by BWC or his wife. It is a matter of concern that the person who earns the most is not only the Board president, but also the person who schedules coverage for the station and racetracks, and authorizes payments.

3. Calculation of Gross Pay

According to BWC, WWAS assumes the following as legal requirements an employer must observe when calculating and reporting gross pay:

- a. All disbursements to individuals must be reported as income on Form 1099's even if the payment is a reimbursement for expenses rather than compensation.
- b. A volunteer cannot be assigned to duties performed by a paid employee.

These policies do not necessarily reflect legal requirements for an employer in all instances and should be examined more thoroughly with legal counsel.

E. Other Expenses

The lack of a budget, receipts, authorization and oversight for purchases from general retailers creates an opportunity for misuse of funds. This review found the high volume of these types of transactions to be a significant control weakness. Gas purchases were, on average under \$40 per transaction which seems low for an ambulance fill-up. This raises concerns that certain purchases of gas were not ambulance related. Of equal concern was the total amount spent at Sam's Club, and the variation in amounts between years.

F. WWAS Accounting Policies and Procedures

The financial review of WWAS provides evidence of the Board's failure to provide proper financial oversight and to safeguard the charity's assets. The Board has failed to invest in

accounting systems and personnel capable of providing regular, reliable reporting on the financial condition of the organization, and to file accurate state and federal reports in a timely manner. The most recent Federal Form 990 report filed is for 2009. The 2010 report was due May 15, 2011 and is significantly overdue.

The Board has failed to require authorization or documentation for purchases. Equipment is purchased without the Board approval. Documentation in the form of receipts and invoices for payments and reimbursements is not provided or retained. Individuals make ATM withdrawals, purchase gas, groceries, and supplies without controls or oversight.

The Board has failed to implement a retention program to safeguard corporate records including bank statements, paid invoices, and board minutes.

Finally, the on-going viability of the organization is continually at risk by the Board's failure to prepare and approve an annual budget and to monitor actual results against the budget. Within this vacuum of reliable information, the Board makes financial commitments in the form of compensation policies, equipment purchases, building repairs, and renovations. In addition, the lack of control and Board oversight creates an opportunity for theft and misuse of funds that can continue undetected.

OTHER MATTERS

I. TOWN OF WENTWORTH CONTRACT DISPUTE

The Town of Wentworth has an annual contract with WWAS for providing ambulance services for residents. The Town also agreed to set aside money each year for a capital reserve fund to accumulate designated funds for the purchase of an ambulance. The amount set aside was approximately \$17K/year. This continued for several years until WWAS purchased a new ambulance and asked the Town to release the funds.

The dispute is first noted in the Board minutes for March, 2009. The minutes state that the selectmen were holding the WWAS contract because of discrepancies and their belief that WWAS was not an actual non-profit. In addition, the selectmen did not submit the warrant to release capital reserve funds for WWAS. According to WWAS attorney Paul Fitzgerald, the Town of Wentworth wanted to see certain WWAS documents because of concerns about how WWAS was operated.

The July 2009 the minutes state that WWAS had received their annual contract money from Wentworth but not the capital reserve funds. In January 2010 the minutes state that the Town of Wentworth had been issued papers. The September minutes state that the issue was in mediation.

An agreement was reached in mediation and signed by BWC. Attorney Fitzgerald stipulated that BWC's signature was subject to Board approval. In May, 2011 the WWAS Board members were presented with the mediation settlement and voted not to accept the terms unless the Town agreed to pay for their legal fees.

Attorney Fitzgerald said the Court determined that the mediation agreement was still valid, even without WWAS' Board approval. In a letter dated September 28, 2011 he states that the case is now largely concluded and he "anticipates formal closure literally within days."

II. DEPARTMENT OF LABOR INVESTIGATION

The Department of Labor (DOL) conducted an audit of WWAS in May, 2010. The audit found a total of 91 violations resulting in a fine of \$8,100. Of these violations 66 involved timely payment of wages, including failure to pay employees on their payday, and issuing paychecks with insufficient funds. The report found no proof of citizenship for two of the four employees. In addition, WWAS did not have signed employee notification forms regarding employees' rate of pay and lacked documentation for volunteers. By the time the investigation was completed all wages were paid and current. As a result DOL agreed to a negotiated settlement of \$700 which was paid in August, 2010.

III. WWAS COOPERATION WITH INVESTIGATION

Board President BWC and bookkeeper MS were the primary contacts and sources for information for this investigation. As noted through-out the report, the lack of a record retention policy at WWAS made obtaining information in a timely manner difficult and at times, impossible. WWAS required an extension for the January 2011 request for information. They

eventually filed a partial response; however, many areas of inquiry were left open. These include explanations for amounts reported on the Form 990's for headcount, wages, fixed assets, accumulated depreciation, and fund balances. Neither BWC nor MS responded to requests for information regarding the irregularities in the financial statements for years 2007-2010.

Following the meetings held with the Board officers on November 29 and December 22, 2011 WWAS has provided limited comments and clarification regarding matters contained herein.

REMEDIAL ACTION AND OVERSIGHT

I. REMEDIAL ACTION

A. Financial Reporting

The most significant issue facing WWAS is the lack of reliable and timely financial information. This report recommends that WWAS take immediate steps to minimize risks until reliable information is available. Specifically, the Board must elect a treasurer capable of fulfilling the duties of the position as outlined in the by-laws. In addition, the Board should consider a moratorium on all payments to members and a freeze on non-essential purchases until reliable financial reports are provided.

To that end, it is recommended that an independent accountant be retained to establish an opening balance sheet for 2011, prepare the 2011 financial statements, and draft a budget for 2012 for Board approval. WWAS should monitor actual financial results against budget, and monitor compliance with procedures (see item B below) prior to fully re-instating any non-essential spending programs.

As noted in the report, WWAS has filed Federal Form 990's containing apparent errors. In addition, the 2010 report remains significantly past due. The Board should consider hiring an accountant to prepare corrected and amended Form 990's for prior years. .

B. Policies and Procedures

The Board must implement policies and procedures that provide authorization, internal controls and segregation of duties for cash receipts, purchasing, accounts payable, and payroll functions. These include, but are not limited to a mileage reimbursement plan, a petty cash system, a purchasing and reimbursement policy, a record retention policy, and an annual physical inventory of all plant, property, and equipment.

In addition, the Board is responsible for complying with its current by-laws and Board-approved procedures. In the course of this investigation, reports have been made by at least one member claiming s/he is no longer being scheduled for shifts, has been removed from the "available for shifts list" and no longer has access to file reports with the State of New Hampshire. To the extent this report is accurate; it represents a violation of WWAS' procedures for scheduling available members in good standing. As mentioned in this report, BWC is responsible for creating the schedule, and his family members earn 65% of the total non-employee compensation paid by WWAS. Further reports have been made claiming that the Board President has repeatedly purchased equipment, including a generator and electric locks, without the required approval from the Board.

C. Board Training

The State of New Hampshire assigns certain legal duties and responsibilities to the governing board of a charitable organization. In addition, the organization's Articles of Incorporation and By-laws place additional duties and constraints on the Board. Each member has an obligation to make certain that the Board fulfills all of its duties, and that the charity conducts its affairs in a

manner consistent with generally accepted business practices. In order to fulfill these requirements, this Board should make an on-going commitment to periodic board training for its officers and members. This will develop strong and informed leadership, and promote a healthy turnover in qualified officers.

D. Election of Officers

This review found consistent evidence that the current leadership has been unwilling to conduct its affairs using qualified office personnel and normal business practices. There is a pattern of disregard for Board policies and by-laws. We encourage the Board to carefully consider its fiduciary duties, to develop new leadership, to recognize the potential value of term limits, to elect qualified officers, and to hold them accountable.

We also suggest that WWAS modify their by-laws to allow for additional Board members who will bring financial expertise and management experience. Electing town officers from Warren and Wentworth is one option that may add a level of independent oversight.

II. WWAS RESPONSE

WWAS has responded through their attorney to several observations and recommendation made in this report. In letters to the CTU dated December 13, 2011 and February 1, 2012 their attorney states that WWAS agreed to consider changes in the following areas:

1. Minute-taking procedures at monthly meetings
2. Future Treasurer's reports presented at monthly meetings
3. Presentation of a President's Report and Treasurer's Report at annual meetings
4. Second signatures on checks above a certain amount
5. Reduction in the number of bank accounts and retention of bank statements

The attorney further states that the organization is in the process of changing their by-laws and their conflict of interest policy.

III. OVERSIGHT

This report has detailed remedial action, as set forth herein. It is the expectation of the CTU that significant changes in the governance of this non-profit entity will be made. The CTU will monitor the activities of WWAS for the next twelve months, and beyond as necessary. WWAS is hereby required to submit the following information to the CTU on a monthly basis, commencing immediately:

1. All Board-approved meeting minutes
2. Copies of all monthly bank statements
3. Monthly reports of deposits and disbursements from WWAS' bookkeeping system
4. Monthly financial statements from WWAS' bookkeeping system
5. Monthly Treasurer's Reports as presented to the Board
6. Copies of all policies and procedures approved and implemented
7. Documentation of a year-end physical inventory report of WWAS' property and equipment

A complete and accurate Form 990 and NH Annual Report for 2010 must be filed with the IRS and the Attorney General's office no later than March 30, 2012, with the 2011 reports filed on time.

In addition there will be quarterly on-site visits by the CTU, beginning April 2, 2012, to examine documentation and authorization for selected transactions. Further, the Board will submit an action plan to the CTU to address the findings noted in each section of this report. The plan will define and prioritize their efforts and include anticipated dates for completion. The action plan is to be submitted no later than close of business March 30, 2012.

The payment made to BWC in 2005 in the amount of \$1,000 (See "Conflict of Interest." Page 7) represents unreported personal income. WWAS must properly report this income to the Internal Revenue Service, or the funds must be returned to the organization.

Failure to meet the requirements set forth in this report will result in further actions by the CTU consistent with its statutory and common law authority.

**Warren Wentworth Ambulance Service
Comparative Balance Sheet
As of December, 31**

	2007	2008	2009	2010
CD Account	\$4,871	\$4,871	\$4,871	\$4,871
Checking Account	\$20,721	\$21,934	\$15,240	(\$807)
Combined Deposit	(\$24,792)	(\$24,792)	(\$24,792)	(\$24,792)
Doug Clark			(\$1,000)	(\$1,000)
HiFi	\$18,340	\$18,340	\$18,340	\$18,340
Rebate			(\$116)	(\$1,260)
Savings Discount			(\$24)	(\$24)
Savings			(\$1,500)	(\$1,500)
Total Cash	\$19,139	\$20,352	\$11,018	(\$6,173)
Accounts Receivable	(\$7,600)	(\$13,600)	(\$11,600)	(\$11,600)
Total Assets	\$11,539	\$6,752	(\$582)	(\$17,773)
Station Mortgage	\$77,220	\$77,220	\$77,220	\$77,220
Equity	(\$65,681)	(\$70,468)	(\$77,802)	(\$94,993)
Total Liabilities & Equity	\$11,539	\$6,752	(\$582)	(\$17,773)

Note: Schedule presents Balance Sheets provided by WWAS and reformatted for presentation purposes.

**Warren Wentworth Ambulance Service
Comparative Income Statement
As of December, 31**

	2007	2008	2009	2010
Insurance Income	\$69,183	\$131,721	\$185,229	\$245,344
Town Support	\$20,875	\$29,000	\$35,013	\$32,750
Race Track	\$5,000	\$20,100	\$18,480	\$27,850
Donations	\$5,938	\$13,555	\$1,500	\$1,300
Fundraising	\$7,386	\$8,217	\$11,241	\$7,004
Interest/Other	\$23	\$1,095	\$186	\$313
Total Income	\$108,406	\$203,688	\$251,649	\$314,562

Accounting	\$0	\$776	\$720	\$0
Ambulance - Fuel	\$3,156	\$10,097	\$8,805	\$12,410
Ambulance - Insur/Registration	\$0	\$0	\$2,391	\$3,465
Ambulance - Maintenance	\$3,480	\$3,929	\$4,152	\$17,681
Ambulance Loan payment	\$18,559	\$18,559	\$18,559	\$20,828
Bank Fees	\$0	\$800	\$1,400	\$3,074
Canaan Fast Squad	\$1,900	\$1,000	\$0	\$0
Communications	\$6,695	\$4,316	\$5,184	\$5,145
Construction	\$2,895	\$5,442	\$7,474	\$5,629
Donations	\$3,292	\$50	\$0	\$0
Fundraising Expense	\$6,026	\$4,667	\$6,696	\$5,028
Insurance - other	\$2,469	\$7,248	\$6,833	\$6,148
Insurance - Workman Comp	\$921	\$2,890	\$14,157	\$14,616
Legal Fees	\$0	\$348	\$702	\$5,205
Maintenance	\$6,649	\$7,906	\$7,960	\$7,966
Miscellaneous	\$378	\$2,603	\$693	\$551
Mortgage	\$8,256	\$8,927	\$8,137	\$8,069
Payroll	\$0	\$57,710	\$104,098	\$158,789
President's Expense/ Dues	\$70	\$369	\$1,423	\$82
Race Track Exp	\$3,800	\$6,000	\$8,715	\$8,000
Rescue Equipment	\$0	\$0	\$4,786	\$0
Squad Clothes	\$2,589	\$13,283	\$4,889	\$2,081
Squad supplies	\$2,407	\$5,934	\$4,806	\$2,694
Squad training	\$4,644	\$6,815	\$2,589	\$4,004
Stipends	\$19,396	\$11,952	\$14,670	\$19,762
Supplies (Medical/Other)	\$7,444	\$8,486	\$4,750	\$5,495
Supplies (Office)	\$1,047	\$2,975	\$1,301	\$994
Utilities:	\$11,900	\$15,396	\$13,095	\$14,038
Total Expenses	\$117,972	\$208,477	\$258,983	\$331,753
Net Income	(\$9,567)	(\$4,789)	(\$7,334)	(\$17,192)

Note: Schedule presents Income Statements provided by WWAS and reformatted for presentation purposes.

**Warren Wentworth Ambulance
Employee and Volunteer Compensation by Year**

ATTACHMENT B

Employee/W-2 Earnings	2007	2008	2009	2010	Total 2008-2010
Anderson, R.		\$0	\$280	\$0	\$280
Barden		\$0	\$0	\$972	\$972
Bixby		\$0	\$3,175	\$0	\$3,175
Bryant		\$2,000	\$175	\$0	\$2,175
Clark, BD		\$0	\$0	\$432	\$432
Clogston		\$2,150	\$1,365	\$0	\$3,515
Connors		\$375	\$0	\$0	\$375
Czarnecki		\$41,700	\$23,716	\$18,830	\$84,246
Edmunds		\$0	\$0	\$7,698	\$7,698
Erickson		\$0	\$40	\$0	\$40
Gagnon		\$0	\$0	\$600	\$600
Gross		\$2,800	\$42,426	\$20,662	\$65,888
Houston		\$0		\$4,204	\$4,204
Mooney		\$0	\$2,452	\$5,653	\$8,105
Robinson		\$0	\$17,595	\$29,948	\$47,543
Swan		\$0	\$240	\$0	\$240
Thompson		\$0	\$16,771	\$25,021	\$41,792
Total	Not Provided	\$49,025	\$108,235	\$114,019	\$271,279

Non-Employee Compensation	2007	2008	2009	2010	Total 2007-2010
Huff, C				\$90	\$90
Burhoe, T			\$100		\$100
Dropkin, J	\$150				\$150
Harvey, R				\$180	\$180
Reed, A				\$183	\$183
Bordonaro, R				\$237	\$237
Erickson, S				\$240	\$240
Taffe, W			\$80	\$200	\$280
Bixby, D				\$375	\$375
Connors, M	\$100		\$375		\$475
Ingalls				\$700	\$700
Dearbhail, M	\$505	\$305			\$810
Halsey				\$913	\$913
Thompson	\$100	\$650	\$375		\$1,125
Dross	\$400	\$500		\$300	\$1,200
Heath	\$1,124	\$320			\$1,444
Anderson, R	\$1,530				\$1,530
Bryant	\$930	\$125	\$200	\$445	\$1,700
Clark, M				\$1,700	\$1,700
Quesnell	\$0	\$1,200	\$600	\$250	\$2,050
Anderson, C	\$1,943	\$315	\$150	\$0	\$2,408
Clogston	\$2,157	\$400	\$500		\$3,057
Swan	\$1,301	\$165	\$1,090	\$1,900	\$4,456
Clark, BD	\$1,445	\$245	\$500	\$2,325	\$4,515
Clark, E	\$1,149	\$1,302	\$4,050	\$3,350	\$9,851
Clark, BW	\$6,562	\$6,425	\$6,650	\$8,775	\$28,412
Total	\$19,396	\$11,952	\$14,670	\$22,162	\$68,180
Total Clark	\$100	\$0	\$455	\$815	\$1,370
Clark as % of Total	0.5%	0.0%	3.1%	3.7%	2.0%