

**GOVERNMENT OF THE DISTRICT OF COLUMBIA
Office of the Inspector General**

Inspector General



**Executive Summary Concerning the Results
of an Office of the Inspector General Investigation
Into Misconduct Violations by an Employee of the
D.C. Department of Parks and Recreation**

2008-0526(S)

INVESTIGATIVE SYNOPSIS

The District of Columbia Office of the Inspector General (OIG) recently completed an investigation into allegations that a D.C. Department of Parks and Recreation (DPR) Recreation Specialist misused funds paid by parents of children attending the DPR 2008 summer soccer camp as registration fees. The investigation revealed that the Recreation Specialist violated six sections of the DPM, two sections of the DPR Manual, and one section of the D.C. Code.

The OIG investigation revealed that the Recreation Specialist stole the payment of \$110 by a parent (parent one) of a child (child one), who attended the DPR 2008 summer soccer camp. In addition, the investigation revealed that the Recreation Specialist improperly loaned money to a second parent (parent two) of a second child (child two), so that child two could register for the DPR 2008 summer soccer camp, and then was reimbursed by parent two.

OIG investigators interviewed parent one, parent two, and a third parent (parent three), as well as the Recreation Specialist. OIG investigators attempted to obtain records pertaining to the DPR 2008 summer soccer camp and reviewed the records that were available. OIG investigators also reviewed the DPR Manual.

The DPR Manual contains specific written procedures for the proper collection of DPR fees. The DPR Manual provides that checks should be made payable to the D.C. Treasurer and customers registering for DPR programs should be issued an original cash receipt to confirm enrollment. A review of pertinent DPR records reveals that in the summer of 2008, there were four DPR 2008 summer soccer camp sessions: June 23–July 4; July 7–July 18; July 21–August 1; and August 4–August 15.

In an interview with OIG investigators, parent one said that on July 30, 2008, parent one attempted to register child one using the online system for the August 4–August 15 DPR 2008 summer soccer camp session but the online registration for the camp was closed.

On August 4, 2008, parent one spoke with the Recreation Specialist who informed parent one that it was not too late to register. Parent one stated that at no time did the Recreation Specialist offer to pay for the registration.

Parent one paid for camp fees using a personal check. The Recreation Specialist told parent one to leave the payee portion of the check blank and that the Recreation Specialist would write in the payee on the check. Parent one provided the Recreation Specialist with a signed personal check, dated August 4, 2008, in the amount of \$110. The recreation Specialist did not issue parent one a receipt. Child one, however, attended the camp. In late August 2008, parent one received from parent one's bank a copy of the negotiated check.¹ A name unknown to parent one ("the name") had been written in the payee portion. Parent one told OIG investigators that she does not know the person whose name is depicted on the check and did not authorize anyone to write the name in the payee portion of the check.

A review of DPR 2008 summer soccer camp enrollment rosters reveals that child one is listed on the June 23-July 4 session of the DPR 2008 summer soccer camp sessions, but is not listed on the enrollment roster for any of the other sessions, including the August 4-August 15 session.

In an interview with OIG investigators, the Recreation Specialist stated that parent one contacted him after the registration closed to ask if there was still time to register child one. The Recreation Specialist said he registered and paid for child one with his own personal money, without parent one's knowledge. The Recreation Specialist said he could not explain why child one's name is not on the August 4-August 15 DPR 2008 summer soccer camp enrollment roster. The Recreation Specialist admitted to OIG investigators that he received a check from parent one in the amount of \$110. The Recreation Specialist admitted that he instructed parent one to leave the payee portion of the check blank and that he would write in the payee for parent one. The Recreation Specialist also admitted that he subsequently made the check payable to his wife, that he knew he was not authorized to write his wife's name on the check, and that the check should have been made payable to the D.C. Treasurer.

With respect to other DPR 2008 summer soccer camp enrollees, the Recreation Specialist acknowledged to OIG investigators that he failed to follow proper payment procedures on other occasions. The Recreation Specialist said that on two occasions he loaned money to parent two for the registration of child two. The Recreation Specialist said that parent two accepted the cash from him and deposited the money into parent two's bank account.

¹ A review of the check reveals that although the check was written for \$110, the bank negotiated the check for only \$100.

Parent two then registered child two for the camp and paid once with a check and once with a money order. The Recreation Specialist said parent two later reimbursed him by writing him a personal check.²

In an interview with OIG investigators, parent two acknowledged having a conversation with the Recreation Specialist during which the Recreation Specialist told parent two that he would take care of the payment and registration until parent two came in with the money. Parent two said that parent two later gave the Recreation Specialist a money order, made payable to the Recreation Specialist, by name, for the cost of the camp. Parent two also said that the Recreation Specialist has helped parent two in the past by paying for the camp so parent two did not miss the deadline. Parent two said parent two paid back the Recreation Specialist with a check or money order.

Throughout this investigation, OIG investigators attempted to obtain the copies of all payment records and cash receipts for the DPR 2008 summer soccer camp, but were unable to do so. DPR employees who attempted to assist OIG investigators with obtaining these records were unable to locate most of them.

This matter was referred to the United States Attorney's Office, which declined prosecution of the Recreation Specialist.

ANALYSIS AND CONCLUSIONS

In August 2008, the Recreation Specialist violated DPR Manual procedures after he informed parent one that he could register her child for soccer camp even though the online registration had closed. According to DPR procedures, parent one should have given the Recreation Specialist a check payable to the D.C. Treasurer to register child one in a DPR soccer camp. In exchange, the Recreation Specialist should have provided parent one with a receipt for the camp registration. Instead, the Recreation Specialist requested and received a blank check from parent one. Furthermore, the Recreation Specialist did not provide parent one with a receipt. After the Recreation Specialist received the check, he made the check payable to his wife and not the D.C. Treasurer. Parent one did not authorize the Recreation Specialist to write the check to his wife and the Recreation Specialist did not receive parent one's permission to do so. Parent one's copy of the check indicates that the bank cashed the check.

² The Recreation Specialist told OIG investigators that he also loaned money to the parent of child three for the DPR 2008 summer soccer camp registration. The Recreation Specialist said that parent three later repaid him, but he could not recall the method of payment. OIG investigators interviewed parent three, who confirmed registering her child for the DPR 2008 summer soccer camp, but said that parent three was not late paying for the camp and that parent three never borrowed money from the Recreation Specialist or asked him to pay for child three's registration.

The OIG investigation also revealed that the Recreation Specialist did not follow DPR Manual procedures when he loaned money to two other parents to register their children for soccer camp. It appears that the two parents repaid the Recreation Specialist the cost of the camps.

Therefore, the Recreation Specialist violated District standards of conduct and DPR Manual procedures in that his conduct created the appearance of giving preferential treatment to certain parents, impeding government efficiency or economy, losing complete independence or impartiality, making a government decision outside official channels, and affecting adversely the confidence of the public in the integrity of government. With respect to the payment of parent one, the Recreation Specialist also used his public office for his private gain and violated the theft statute in the D.C. Code.

Accordingly, this investigation has **SUBSTANTIATED** that the Recreation Specialist committed the following violations:

1. DPM § 1803.1(a) (1) (Using public office for private gain).
2. DPM § 1803.1(a) (2) (Giving preferential treatment to any person).
3. DPM § 1803.1(a) (3) (Impeding government efficiency or economy).
4. DPM § 1803.1(a) (4) (Losing complete independence or impartiality).
5. DPM § 1803.1(a) (5) (Making a government decision outside official channels).
6. DPM § 1803.1(a) (6) Affecting adversely the confidence of the public in the integrity of government.
7. DPR Manual, Fees and Collections, § 1.B. Receipt of Funds, Acceptance of Checks & Money Orders.
8. DPR Manual, Fees for Classes & Group Activities, § 3.B. (Cash Receipts).
9. D.C. Code § 22-3211 (Theft) (2010).

RECOMMENDATIONS

Based on the results of this investigation, the Office of the Inspector General recommends that DPR:

- Address the conduct of the Recreation Specialist with appropriate administrative action;

- Determine whether it is appropriate to allow Recreation Specialists to collect funds for DPR summer camps, and create and implement, new written procedures, if appropriate;
- Maintain all records pertaining to DPR programs in accordance with the District and DPR's records retention policies; and
- Review its procedures for tracking and reconciling attendance and payment records relating to DPR programs and strengthen and/or enforce those procedures, as necessary.

November 10, 2010