



OFFICE OF THE DISTRICT OF COLUMBIA AUDITOR

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019:99:VJ

**AUDITOR'S REVIEW OF UNAUTHORIZED
TRANSACTIONS PERTAINING TO ANC 1A**

September 27, 1999



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Commissioner Dekontee L. Johnson,

Chairperson

Advisory Neighborhood Commission 1A

1434 Parkwood Place, N.W.

Washington, D.C. 20010

Letter Report: Auditor's Review of Unauthorized Transactions Pertaining to ANC 1A

Dear Commissioner Johnson:

Pursuant to D.C. Code, Section 1-264(d), the District of Columbia Auditor conducted an examination of unauthorized and unsupported checks written on Advisory Neighborhood Commission (ANC) 1A's closed bank account during fiscal year 1998 by its then-chairperson, Robert W. Tucker. The Auditor also examined transactions pertaining to the former chairperson's receipt and use of a "platinum plus for business" credit card obtained in his name and that of ANC 1A.

OBJECTIVES, SCOPE AND METHODOLOGY

The objectives of this examination were to determine whether:

1. certain disbursements using ANC 1A's bank checks were adequately documented, authorized by a majority of the ANC's commissioners, and used for a public purpose related to the mission of the ANC;
2. ANC 1A funds were improperly disbursed by its former chairperson;
3. the receipt of a credit card in the name of ANC 1A and its former chairperson violated the Advisory Neighborhood Commission Act of 1975 (ANC law), as amended, other applicable laws, and legal opinions issued by the Office of the Corporation Counsel;

4. purchases made with the credit card were for a public purpose related to ANC 1A's mission and/or office operation; and
5. ANC 1A funds were used to pay for financial transactions charged to the credit card.

The present audit of ANC 1A was limited to fiscal year 1998 and specifically focused on ANC 1A checks written to its former chairperson and certain vendors. The Auditor also examined the former chairperson's use of a credit card obtained by him on the basis of his official relationship, at the time, with ANC 1A.

In conducting the examination, the audit team interviewed ANC 1A's former chairperson, Robert Tucker; its then-treasurer, Mack James; a representative of MBNA America (MBNA), which issued the credit card; and other individuals and ANC 1A commissioners, as appropriate.

BACKGROUND

On June 1, 1998, the District of Columbia Auditor issued a report entitled, "Audit of Advisory Neighborhood Commission 1A for Fiscal Years 1994 Through 1997." In that report, the Auditor found numerous deficiencies in ANC 1A's financial operations including the lack of supporting documentation for all of the Commission's financial transactions. The Auditor also found instances in which ANC 1A's officers violated the ANC law, and failed to comply with legal opinions issued by the Office of the Corporation Counsel and Financial Guidelines and Procedures established by the Office of the District of Columbia Auditor.

After the June 1998 report was issued, the District of Columbia Auditor determined that several ANC 1A checks were written to ANC 1A's then-chairperson, Robert Tucker, and to Office Depot, a merchant of office supplies and equipment. At the time the checks were written, ANC 1A had no funds in its bank account. Consequently, its account was closed by the bank in November 1997. The Auditor determined that none of ANC 1A's funds were actually disbursed as a result of the improper use of its bank checks.

Minutes of ANC 1A's October 24, 1998 meeting indicated that during the meeting ANC 1A commissioners voted unanimously to remove Mr. Tucker as chairperson of ANC 1A.

FINDINGS

UNAUTHORIZED AND UNSUPPORTED CHECKS WERE WRITTEN ON ANC 1A's CLOSED BANK ACCOUNT

Checks Worth At Least \$2,000 Were Written on ANC 1A's Closed Bank Account To Its Then-Chairperson, Robert Tucker

District of Columbia Code, Section 1-264(f) states in relevant part the following:

"... No expenditure of any amount shall be made without the specific authorization of the Commission. Any expenditure made by check shall be signed by at least 2 officers of the Commission, one of whom shall be the treasurer or Chairman. . . ."

Further, ANC Financial Guidelines and Procedures issued by the Office of the District of Columbia Auditor state in relevant part the following:

"Prior to disbursing funds, the Treasurer must ensure that a voucher package is prepared which contains the following:

- a. An original invoice or receipt from the supplier of goods or services..."

ANC 1A's bank closed the ANC's account in November 1997 when its account reached a zero balance. Approximately ten months later, in September 1998, at least six checks totaling \$2,000 were written on ANC 1A's closed bank account to its then-chairperson, Robert Tucker. The checks were written without the ANC's statutorily required approval and without the preparation of voucher packages. ANC 1A's files did not contain minutes reflecting that a majority of commissioners authorized any disbursements to Mr. Tucker. Further, minutes of an October 24, 1998 ANC 1A meeting indicated the following regarding the ANC's knowledge and authorization of the financial transactions discussed in this report:

"ANC 1A Commissioners, singly and collectively, had no prior knowledge of the actions of Robert Tucker with respect to the ANC 1A bank account or credit card account;

ANC 1A has not approved any expenditure since the Industrial Bank Account assets were seized by the IRS in the spring of 1997; ANC 1A has contacted the IRS to reconcile payroll account records and resolution is pending;

ANC 1A disavows any illegal actions taken by Robert Tucker in the name of ANC 1A, recommends that the proper authorities be notified, and supports the thorough investigation of activities not sanctioned or authorized by the Commission."

As noted previously, voucher packages were not prepared for any of the checks written to Mr. Robert Tucker. The voucher packages should have contained invoices or receipts from suppliers of goods or services. The checks were cashed at various business establishments and were not supported by any documentation concerning the receipt and use of the funds obtained. Further, the ANC's files did not contain any other documentation indicating the purpose for issuing ANC 1A checks totaling \$2,000 to Mr. Tucker.

The checks made payable to Mr. Tucker were signed by several individuals- none of whom appeared to be ANC 1A officers, commissioners, or in any other way connected to ANC 1A. The audit team was unable to determine the relationship, if any, of the signers to ANC 1A or whether the signatures were forged or legitimate. Signature cards on file at ANC 1A's bank did not identify any of the signers on the face of the checks as authorized to sign or counter-sign ANC 1A checks.

It appeared that Mr. Tucker endorsed five of the six checks made payable to him. The checks were further endorsed by the businesses that cashed the checks. When the businesses presented the checks to ANC 1A's bank for payment, the bank dishonored and returned the checks unpaid. Table I below lists the unauthorized and unsupported ANC 1A checks written to Mr. Tucker.

Table I
Undocumented and Unauthorized Checks
Written to Robert Tucker

Check No.	Date	Payee	Amount	Signature on Check
2354	September 4, 1998	Robert Tucker	\$350.00	Reggie Mathew & Linda Harris
2356	September 8, 1998	Robert Tucker	350.00	Reggie Washington & Linda Wright
2358	September 9, 1998	Robert Tucker	350.00	Reggie Washington & Linda Harris
2360	September 10, 1998	Robert Tucker	350.00	Reggie Washington & Linda Harris
2362	September 4, 1998	Robert Tucker	250.00	Reggie Walker & Illegible Signature
2363	September 5, 1998	Robert Tucker	350.00	Reggie Washington & Illegible Signature
	Total		\$2,000.00	

Source: Checks obtained by the Auditor directly from ANC 1A's bank. Some of the copies were difficult to read. The information recorded on the table is based on the Auditor's ability to read the information on the checks.

Unauthorized and Unsupported Checks
Totaling At Least \$4,883 Were Written to Office Depot
on ANC 1A's Closed Bank Account

At least \$4,883 worth of ANC 1A checks were written to Office Depot for which supporting documentation, including minutes reflecting the ANC's approval, could not be found in ANC 1A's files. As noted earlier, minutes of an October 24, 1998 ANC 1A meeting reflected that since the Spring of 1997 the commissioners of ANC 1A had not authorized the disbursement of any ANC funds. Further, the ANC's files did not contain receipts or invoices identifying the items purchased from Office Depot. However, Office Depot provided the Auditor with a list identifying the items obtained by checks written on ANC 1A's closed checking account. Upon inspection of the ANC's office, none of the items apparently obtained from this vendor were present. Further, the Auditor could not determine the location or disposition of the items. However, the delivery address on some of the orders appeared to be the same address identified on ANC documents as that of Mr. Robert Tucker's home.

As previously noted, ANC 1A had a zero balance in its account as of November 28, 1997 and its account was closed. Therefore, when Office Depot presented the checks to the bank for payment the checks were dishonored and returned unpaid.

ANC 1A's former treasurer indicated that Mr. Tucker informed him that he had dropped and broken the ANC's fax machine. When the treasurer suggested that the machine should be repaired, Mr. Tucker indicated that he would purchase a new fax machine for the ANC. Documentation provided by Office Depot for the Auditor's review indicated that between May 1998 and July 1998, at least four fax machines were obtained from Office Depot with checks written on ANC 1A's closed bank account. During the audit team's field work, ANC 1A's then-treasurer indicated that the ANC's office did not contain a fax machine, either new or broken. Further, various ANC 1A commissioners indicated that they were not aware of the location of any of the fax machines or other equipment and supplies obtained from Office Depot. Table II below lists the checks written to Office Depot and identifies the items obtained.

Table II
Unauthorized and Undocumented Checks¹
Written to Office Depot

Check No.	Date	Payee	Amount	Items Obtained
2366	June 10, 1998	Office Depot	465.23	1 HP printer, 3 printer ink cartridges, laptop parallel cable, composition book and bathroom tissue
2367	May 11, 1998	Office Depot	729.79	Laptop, 7 poster boards, easel, 2 display boards, 1 dozen legal pads, 1 dozen pads, 2 cases of sprite
2368	Date Unknown	Office Depot	248.83	2 call waiting units, 2 triplex adapters, 1 12-cup decanter, 10 reams of yellow copy paper, 10 ultra palm anti-bacterial
2369	Date Unknown	Office Depot	175.51	2 toner cartridges, oscillating fan
2576	May 31, 1998	Office Depot	243.21	1 plain paper fax
2578	Date Unknown	Office Depot	699.84	1 laptop, 10 packages "D" energizer batteries
2579	Date Unknown	Office Depot	787.80	1 personal copier, 1 toner cartridge, 2 cases copy paper
2580	July 6, 1998	Office Depot	274.92	1 plain paper fax, 2 cases of copy paper
2581	June 2, 1998	Office Depot	666.18	1 personal copier, 3 packs of lift-off tape
2598	Date Unknown	Office Depot	169.57	1 refrigerator, 2 fax print cartridges,
2600	July 12, 1998	Office Depot	422.98	2 plain paper fax machines
	Total		\$4,883.86	

Source: Checks obtained by the Auditor directly from ANC 1A's bank and a list of items ordered obtained from Office Depot. Some of the check copies were difficult to read. The information recorded in Table II is based on the Auditor's ability to read the information on the checks.

It is likely that these improper transactions may adversely affect ANC 1A's ability to make future purchases by check in the business community in that Office Depot forwards its dishonored checks to TeleCheck Recovery Services, Inc. (TeleCheck) for collection efforts. For example, by letter dated October 4, 1998, TeleCheck informed ANC 1A that check number 2578, written to Office Depot for \$699.84, had been assigned to it for collection and that it had entered ANC 1A's name into its national computer files. It further stated that until the matter regarding the unpaid check was resolved, TeleCheck may not approve ANC 1A checks or the opening of accounts with more than 120,000 merchants and banks that use TeleCheck's services. Thus, ANC 1A may encounter difficulty opening another checking account or legitimately using ANC 1A checks to purchase goods and services.

The Auditor has referred this matter to the appropriate law enforcement authority for further investigation.

¹The names of check signers were not legible on any of the checks listed in Table II.

RECOMMENDATION

The Office of Inspector General investigate the events related to the \$2,000 in unauthorized and unsupported checks written to ANC 1A's then-chairperson, and the \$4,883 in checks written to Office Depot.

ANC 1A'S FORMER CHAIRPERSON OBTAINED A PLATINUM CORPORATE CREDIT CARD USING THE NAME AND ADDRESS OF ANC 1A

ANCs are not authorized to obtain or use credit cards. A May 28, 1996 opinion from the Office of the Corporation Counsel stated, in relevant part, that an Advisory Neighborhood Commission: "may not use credit cards directly or indirectly to purchase goods or services...." Despite this prohibition, in February 1998 Mr. Robert Tucker successfully applied by telephone for a credit card from MBNA America. The credit card statement was addressed as follows:

"Robert Tucker
Adversary Nghbrhd Cmsn
Adversary Nghbrhd Cmsn
3411 14th St. NW 2nd floor
Washington, D.C. 20010-1362"

It appeared that Mr. Tucker applied for the credit card on behalf of ANC 1A rather than for himself personally. According to the representative for MBNA, Mr. Tucker provided ANC 1A's address as the mailing address for the credit card as well as other information regarding ANC 1A. Further, according to the MBNA representative, in order to receive a MBNA "platinum plus for business" credit card, an applicant must be in a management position with a business establishment or an officer such as treasurer or chief financial officer. Individuals applying for a card on behalf of themselves personally, rather than applying on behalf of a business establishment, would not be eligible for an MBNA America platinum plus for business credit card. Finally, according to the representative, former Chairperson Tucker represented ANC 1A as a corporate entity associated with the District of Columbia Government, and further represented himself as its chairman (or chief executive officer) in seeking to obtain a card for the ANC.

According to the MBNA representative, Mr. Tucker provided the name of an employee of the District of Columbia's Department of Youth Services to verify information about ANC 1A. By providing misleading information to MBNA, Mr. Tucker may have given the false impression that he was applying for a credit card for ANC 1A.

According to Mr. Tucker, he used ANC 1A's name and address in applying for the credit card because he wanted to have his business address on the card and because he spent a lot of time in the ANC office. Mr. Tucker indicated that he obtained the credit card for his personal use, that purchases charged to the credit card account were for his personal use, and that he was responsible for making payments on the account because the card was in no way connected to ANC 1A. Nevertheless, based on misleading information supplied by Mr. Tucker when he applied for the card, MBNA has attempted to obtain payment of Mr. Tucker's charges from the District government.

While Mr. Tucker indicated to the audit team that he requested the card for his personal use, his actions in obtaining the card raised serious questions regarding his actual intent. The actions included: (1) using ANC 1A's address; (2) providing the name of an employee of the District government to verify information about ANC 1A; and (3) using a \$9,000 check drawn on ANC 1A's closed bank account in an improper attempt to make a payment on the account.

ANC 1A's Former Chairperson Used the Corporate Credit Card to Make Charges of a Personal Nature and to Obtain Cash Advances

Several events surrounding the use of the credit card suggested that Mr. Tucker used ANC 1A's name and financial documents for his personal gain. Based on the audit team's review of the May 1998 credit card statement, Mr. Tucker appeared to have used the card to make purchases of a personal nature. Further, the statement reflected that a balance of \$15,152 was owed on the card. For the May statement alone, more than \$8,000 in purchases and cash advances were charged to the credit card. The May statement included charges made during the month of April 1998. Examples of charges made during the month of April 1998 included: District Cablevision, Jerry Springer, Road House Oldies, Pizza Hunt, QVC, The Dog Wash, the Braxton Hotel. A review of the charges for the month of April 1998 revealed that for nine days, between April 3, 1998 and April 11, 1998, Mr. Tucker obtained fifteen (15) cash advances totaling approximately \$4,400. Appendix I contains a more detailed description all charges included on the May 1998 credit card statement.

ANC 1A commissioners interviewed by the audit team indicated that they did not authorize the receipt of the credit card, were not aware of the credit card, and were not aware of any credit card purchases made for the benefit of ANC 1A.

A \$9,000 Check Was Written on ANC 1A's Closed Bank Account in an Attempt to Make a Payment on The Credit Card Account

ANC 1A's former chairperson, Robert Tucker, attempted to make a \$9,000 payment to MBNA by using an undated ANC 1A check written on its closed bank account. The signature on the check was illegible and, therefore, the Auditor could not determine whose signature appeared on the check. When MBNA presented the check to ANC 1A's bank for payment, the ANC account had been closed since November 1997, therefore, the bank dishonored the check and returned it unpaid.

No funds were actually disbursed from ANC 1A's closed bank account for payment of the \$9,000 check. Nevertheless, Mr. Tucker attempted to use ANC 1A checks to pay for purchases that did not relate to the business of the ANC and were of a personal nature. Mr. Tucker indicated that he wrote the check because he knew there was no money in the account and he wanted to get the credit card company "off of his back." Mr. Tucker's misuse of his position of trust as a public official with regard to ANC 1A's assets was highly improper and must be fully investigated by appropriate law enforcement authorities.

RECOMMENDATION

The Office of Inspector General investigate the events related to the credit card charges made by Commissioner Robert Tucker which totaled approximately \$15,000 as of May 1998.

ANC 1A's COMMISSIONERS FAILED TO DISCHARGE THEIR FIDUCIARY DUTY TO SAFEGUARD THE ANC's ASSETS

The Auditor's examination of ANC 1A's financial operations and control environment indicated that the ANC's commissioners failed to discharge their fiduciary duty to safeguard the assets of ANC 1A. It appeared that the details of ANC 1A's financial activities were not routinely disclosed to all of its commissioners. Further, the commissioners of ANC 1A failed to establish adequate safeguards to protect the ANC's assets and preserve the integrity of the ANC's operation.

Over a significant period of time, the commissioners of ANC 1A failed to obtain a full and accurate accounting of the ANC's financial activities and location of its office equipment, and failed to establish effective internal controls necessary to prevent or detect unauthorized access to and use of the ANC's assets. At the same time, it appeared that the former chairman and former treasurer failed to voluntarily disclose ANC 1A's financial activities to the commissioners on a regular basis.

When the ANC's checking account was closed in November 1997, the ANC's officers, particularly its treasurer, failed to properly secure the ANC's unused blank checks against subsequent theft or misuse. Several measures could have been implemented to properly secure the ANC's financial instruments including mutilation of all unused blank checks for the closed account, or turning them over to the District of Columbia Auditor for mutilation and destruction in the presence of one or more representatives from ANC 1A. The treasurer at that time failed to take appropriate prudent actions to safeguard the ANC's checkbook and unused checks.

The commissioners of ANC 1A must approve each expenditure of ANC funds before the treasurer and chairman may make any disbursements. This approval may be: (1) of an annual budget for routine operating expenses, and (2) on an itemized basis for all non-routine expenditures. The commissioners' approval of the annual budget and all non-routine expenditures must be recorded in ANC 1A's minutes along with the results of the vote.

The Auditor suggests that all ANCs separate duties related to financial accounting and reporting by assigning different commissioners the responsibility of performing specific duties relative to the ANC's financial management and reporting function. For example, if the treasurer controls the check book, different commissioners should be assigned the responsibility of receiving the bank statement and canceled checks and performing the bank reconciliation. After commissioners perform the reconciliation and verify the validity of transactions reported in the bank statement, the bank statement and canceled checks should be turned over to the treasurer so that the ANC's monthly and quarterly financial reports can be prepared. Separation of duties in this manner provides a system of checks and balances that should ensure the integrity of the ANC's financial transactions and full disclosure of its financial activity. The Commission should not permit, or grant, its treasurer and/or chairman exclusive access and control of its financial activities, and exclusive access to its financial instruments and records. Further, the Commission should establish an effective system of continuous monitoring and disclosure of the ANC's financial activities.

RECOMMENDATIONS

1. ANC 1A commissioners must adequately discharge their fiduciary duties and require frequent detailed financial reports from their treasurer and chairperson in order to assure accountability for all public assets entrusted to the ANC's management and care.
2. ANC 1A commissioners must ensure that expenditures are fully approved by a majority of commissioners and that disbursements are supported by adequate appropriate documentation.
3. At least monthly, ANC 1A's treasurer and chairman must fully disclose to all ANC 1A commissioners all of the Commission's financial transactions and activity for the preceding 30 days.
4. If the ANC's checking account is closed for any reason all of its unused blank checks for the affected account must be immediately turned over to the District of Columbia Auditor for safekeeping or for mutilation and destruction in the presence of one or more representatives of the ANC.

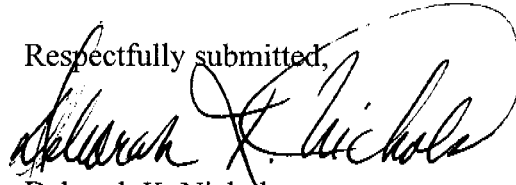
CONCLUSION

This examination concerned the misuse of Advisory Neighborhood Commission 1A's name, unused bank checks, office equipment, and other assets by its former chairperson during fiscal year 1998. At the time the audit was conducted, some of the officers of ANC 1A failed or refused to cooperate fully with the Auditor and failed to facilitate timely access to financial and related records necessary to conduct a thorough audit. Despite the Commission's failure to cooperate fully with the audit, the Auditor was able to obtain substantial information indicating that the ANC's then chairman improperly used his official position, ANC 1A's name, and unused bank checks to engage in a series of financial irregularities.

ANC 1A was not properly represented by its then chairperson, Robert W. Tucker. Mr. Tucker misused ANC 1A's name and bank checks to obtain cash, equipment and supplies totaling approximately \$22,000. Mr. Tucker wrote checks on ANC 1A's closed bank account and cashed checks made payable to him that were not authorized by a majority of ANC 1A commissioners at a public meeting.

It appears that ANC 1A's former chairperson violated a Corporation Counsel opinion by obtaining a credit card using information related to ANC 1A. Further, the former chairperson made charges to the credit card that appeared to be personal in nature and attempted to make payment on the credit card account with a \$9,000 check written on ANC 1A's closed checking account. Although, no ANC 1A funds were actually disbursed, the apparent misuse of ANC 1A checks may have adversely affected the ANC's credit history and ability to easily obtain goods and services in the future.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Deborah K. Nichols", with a large, loopy flourish at the end.

Deborah K. Nichols

District of Columbia Auditor

APPENDIX

**TRANSACTIONS SHOWN ON THE MAY 1998
CREDIT CARD STATEMENT²**

Transaction Date	Description	Amount
April 2, 1998	Sprint Spectrum	260.00
April 3, 1998	Cash Advance from ATM	200.50
	Cash Advance fee	5.00
April 3, 1998	Cash Advance from ATM	351.00
	Cash Advance Fee	7.02
April 3, 1998	The Braxton Hotel	183.78
April 4, 1998	Radio Shack	252.71
April 4, 1998	Footlocker, Wash. D.C.	54.93
April 4, 1998	Cash Advance from ATM	401.00
	Cash Advance Fee	8.02
April 5, 1998	Goldspot	945.00
April 5, 1998	Cash Advance from ATM	101.50
	Cash Advance fee	5.00
April 5, 1998	J.C. Penny, Hyattsville, MD.	69.27
April 5, 1998	Hecht's Calvin Klein	145.43
April 5, 1998	Road House Oldies	205.59
April 6, 1998	Cash Advance from ATM	351.50
	Cash Advance fee	7.03
April 6, 1998	Cash Advance	301.50
	Cash Advance Fee	6.03
April 6, 1998	Jerry Springer	35.90
April 6, 1998	Cablevision	74.55
April 7, 1998	Cash Advance from ATM	351.50
	Cash Advance fee	7.03
April 7, 1998	District Cablevision	28.94
April 8, 1998	Cash Advance from ATM	301.50

²The May statement also reflected a returned check in the amount of \$9,000. The transaction date was reported as April 1, 1998.

**TRANSACTIONS SHOWN ON THE MAY 1998
CREDIT CARD STATEMENT**

	Cash Advance fee	6.03
April 8, 1998	Cash Advance from ATM	381.50
	Cash Advance fee	7.63
April 8, 1998	The Dog Wash, Wash, D.C.	42.25
April 8, 1998	Pizza Hut	29.58
April 9, 1998	Damark Catalog	689.95
April 9, 1998	Cash Advance from ATM	200.50
	Cash Advance fee	5.61
April 9, 1998	Cash Advance from ATM	381.50
	Cash Advance fee	7.63
April 9, 1998	Cash Advance from ATM	201.50
	Cash Advance fee	5.00
April 9, 1998	QVC	26.01
April 9, 1998	QVC	189.79
April 9, 1998	Jerry Springer	24.90
April 10, 1998	QVC	99.64
April 11, 1998	Cash Advance from ATM	301.50
	Cash Advance fee	6.03
April 11, 1998	Cash Advance from ATM	351.50
	Cash Advance fee	7.03
April 11, 1998	Cash Advance from ATM	200.50
	Cash Advance Fee	5.00
April 13, 1998	Damark Catalog	26.99
April 13, 1998	Foreman Grill	69.80
April 20, 1998	Returned check fee	26.00
May 4, 1998	Over credit line fee	25.00
May 4, 1998	Cash Advance Finance Charge	14.50
May 4, 1998	Late Payment Charge	25.00
Total		\$8,019.10

Source: MBNA credit card statement for month of May 1998. The copy was sometimes difficult to read.
The information recorded in the table is based on the Auditor's ability to read the information on the statement.