



**COUNCILMEMBER KEVIN L. FAULCONER  
CITY OF SAN DIEGO  
SECOND DISTRICT**

**M E M O R A N D U M**

**DATE:** July 19, 2013  
**TO:** Greg Bych, Interim Chief Financial Officer  
**FROM:** Councilmember Kevin L. Faulconer, Chair, Audit Committee  
**SUBJECT:** Procurement Card Policy and Procedures

---

In August 2012, the Independent City Auditor released a performance audit of the City's credit card program also referred to as the procurement card program. In the report the City Auditor identified four findings to mitigate the potential misuse of the program.

The report states that "the City does have policies and regulations on allowable purchases of goods and services as well as travel, which should be enforced by Approver reviews." At that time, City management ensured departments would comply with all City regulations relating to the procurement card policy.

According to Administrative Regulation 90.3 which regulates City travel procedures, "care should be taken to obtain the lowest reasonable cost for transportation" and "travel for all employees must be in coach service."

A recent *U-T San Diego* article entitled, "Administrators Increased Cap to \$30,000 Each for Paris Journey" states that two City procurement cards were authorized to have monthly limits increased to \$30,000 for a total of \$60,000 available credit for the purpose of international travel by the Mayor and two members of his security detail.

I have concerns as to whether appropriate procedures were followed in the authorization process to increase the procurement card monthly limits. The Auditor made the recommendation that monthly credit limits be restricted to reduce City liability and ensure purchases were approved in compliance with City policy.

Page 2  
Greg Bych, Interim Chief Financial Officer  
July 18, 2013

Would you please provide a response to the following questions:

- Was the increase in the monthly credit limit in accordance with all applicable policies, including the City's travel policy that requires travel for employees to be in coach service?
- For what reasons was the procurement card monthly limit increase approved by Mayoral staff rather than by SDPD if the costs were to be incurred by the police department?
- According to the City's Procurement Card Program Policies and Procedures Manual, requests to increase monthly credit limits beyond \$25,000 must be submitted to the Office of the City Comptroller for approval with an explanation of the business need. Was this administrative process followed? Specifically, did appropriate management staff outside of the Mayor's office review the request and what was his/her determination?

It is imperative that all applicable policies, including the City's travel policy, were adhered to in order to ensure there is no misuse of the City credit cards at taxpayers' expense.

Would you please provide a written response by Friday, July 26, 2013. I appreciate your assistance.

KLF:kj

cc: Walt Ekard, Interim Chief Operating Officer



THE CITY OF SAN DIEGO

MEMORANDUM

DATE: July 26, 2013  
TO: Honorable Councilmember Kevin Faulconer, District 2  
FROM: Greg Bych, Interim Chief Financial Officer  
SUBJECT: Response to Memo dated July 19, 2013

---

Per your request in your memo dated July 19, 2013 regarding Procurement Card Policies and Procedures, below are the responses to your inquiries:

*Was the increase in the monthly credit limit in accordance with all applicable policies, including the City's travel policy that requires travel for employees to be in coach service?*

City staff in charge of the Procurement Card Program acted in accordance with all applicable policies and SDPD security protocol. The Mayor's expenses were covered by an external party. However, in order to have one individual centrally coordinate the travel reservations for the Mayor and SDPD security detail, appropriate procedures were followed to authorize a temporary increase in the Human Resources Department's procurement card limits. Staff was instructed to restore these limits to their previous levels as soon as possible thereafter. The Human Resources Department's procurement card was utilized to reserve airfare and lodging for the SDPD security detail; but only the airfare expenses were paid with this card. SDPD security detail used their SDPD procurement cards for lodging, as authorized by the Police Department, which did not require an increase in card limits. Economy class was sought provided that it also met SDPD security policy requirements.

*For what reasons was the procurement card monthly limit increase approved by Mayoral staff rather than by SDPD if the costs were to be incurred by the Police Department?*

Per the Procurement Card Policies and Procedures, each Department manages their own procurement card. The Department can request increases to procurement card transaction limits, which are approved by the Comptroller's Office. To ensure coordination of the travel schedules, a member of the Human Resources Department staff was asked to centrally coordinate the arrangements and use their procurement card to make the travel reservations. The card in question has a \$5,000 limit, which was insufficient to make the necessary reservations.

*According to the City's Procurement Card Program Policies and Procedures Manual, requests to increase monthly credit limits beyond \$25,000 must be submitted to the Office of the City Comptroller for approval with an explanation of the business need. Was this administrative process followed? Specifically, did appropriate management staff outside of the Mayor's Office review the request and what was his/her determination?*

All appropriate policies and procedures were followed using the appropriate chain of command for the affected procurement card. The Mayor relayed the nature and justification of the trip to his Chief of Staff. Due to the absence of a City travel agency to coordinate arrangements for the Mayor and his SDPD security detail, the Chief of Staff directed the Interim Chief Operating Officer to assist with the travel arrangements indicating that the Mayor's expenses would be covered by an external party. The Interim Chief Operating Officer relayed this information and designated staff in the Human Resources Department to assist with the travel arrangements. Per procurement card policies and procedures, Human Resources Department staff requested an increase to procurement card limits to the City Comptroller's Office Procurement Card staff. In the absence of the Interim Chief Operating Officer, the Appointing Authority next in line to approve the card limit increases was the Interim Chief Financial Officer.

Please let me know if any additional information is required.



Greg Bych  
Interim Chief Financial Officer

---

GB

Cc: Walt Ekard, Interim Chief Operating Officer  
Scott Chadwick, Assistant Chief Operating Officer



COUNCILMEMBER KEVIN L. FAULCONER  
CITY OF SAN DIEGO  
SECOND DISTRICT

MEMORANDUM

DATE: August 12, 2013

TO: Walt Ekard, Interim Chief Operating Officer

FROM: Councilmember Kevin L. Faulconer

SUBJECT: Travel Credit Card Expenditures

---

On July 19, 2013, I wrote the attached memorandum to Greg Bych, Interim Chief Financial Officer requesting information regarding Mayor Filner's travel to France. I asked several questions to determine whether all applicable credit card (i.e. procurement card) policies and procedures, including but not limited to the reforms suggested by the City Auditor and agreed to by City management, were followed. I appreciate Mr. Bych's timely response and I do have additional questions.

It remains unclear whether the City Procurement Card Program Policies and Procedures Manual was followed in this instance. It is difficult to determine from Mr. Bych's attached response if City credit cards were used to purchase airfare and other travel arrangements for the Mayor.

Additionally, information revealed since I received his memo raises even more questions.

Specifically, Mayor Filner disclosed on July 31, 2013, that he planned to personally pay for his trip because the IRS cannot confirm the 501(c)3 nonprofit status of the entity he said covered his travel expenses. It stands to reason that the Mayor's decision to personally pay, combined with the absence of any specific benefit the City derived, underscores the personal nature of this travel.

Last year the Audit Committee recommended reforms proposed by the City Auditor to strengthen the City's credit card policy. To ensure the City's internal controls and financial practices were followed, and that City funds were not inappropriately used, **I plan to hold a hearing at the September 9, 2013, Audit Committee meeting to consider requesting an investigation by the City Auditor.**

Walt Ekard, Interim Chief Operating Officer  
Page 2  
August 12, 2013

In order for the Audit Committee to make an informed decision, **I respectfully request disclosure of all of credit card invoices and paperwork associated with the Mayor's trip to France**, including verification that the Mayor followed through on his pledge to reimburse the expenses for his trip. Please provide these documents to me by August 28, 2013, to ensure that all Brown Act public noticing requirements are met.

Finally, I respectfully request Mr. Bych, Judy Von Kalinowski, Human Resources Director and Dennis Gakunga, Purchasing and Contracting Director attend the September 9 Audit Committee meeting to help provide context to the committee.

Maintaining strong internal controls to ensure City funds are used appropriately is a top priority of mine as the Chair of the Audit Committee. I appreciate your assistance in this matter.

KLF: kj

Attachments: Memo to Greg Bych dated July 19, 2013  
Memo to Councilmember Faulconer dated July 26, 2013



THE CITY OF SAN DIEGO

MEMORANDUM

DATE: August 29, 2013

TO: Honorable Councilmember Kevin Faulconer, District 2

FROM: Walt Ekard, Interim Chief Operating Officer

SUBJECT: Response to Memo dated August 12, 2013

---

This is in response to your memorandum dated August 12, 2013 regarding the credit card expenses related to the Mayor's trip to Paris.

City credit cards were not used to pay for travel expenses for the Mayor. The City credit cards were only used to purchase airfare and lodging for the SDPD security detail.

Attached to this memorandum is a summary of the expenses for the SDPD security detail. In total, three different cards were used; one by Human Resources staff and two by the SDPD security detail. Human Resources staff used their card to make the airfare arrangements and each member of the SDPD security detail used their cards for their lodging expenses. Other expenses, not charged to the City credit cards, are reflected in the attached summary. Per your request, the City credit card statements and travel expense reports associated with this trip are also attached.

While I had not yet come on board as the City's Interim Chief Operating Officer at the time these arrangements were made, my review of these details gives me confidence that City policies were followed. The staff appropriately followed the directives of the Mayor's office in making the travel arrangements. However, my experience tells me that there are always lessons learned from these experiences and potentially room for improvement in the policies.

City staff, including Assistant Chief Operating Officer Scott Chadwick, Interim Chief Financial Officer Greg Bych, Human Resources Director Judy Von Kalinowski, City Comptroller Ken Whitfield and Police Chief William Lansdowne will be present at the Audit Committee meeting on September 9 to answer any additional questions you may have. We look forward to working with you and the Audit Committee to address your concerns.

Page 2  
Honorable Councilmember Kevin Faulconer  
August 28, 2013



Walt Ekard  
Interim Chief Operating Officer

WE

Attachments: 1: Travel Expense Summary  
2: Credit Card Statements  
3: Travel Expense Reports

Cc: Scott Chadwick, Assistant Chief Operating Officer  
Greg Bych, Interim Chief Financial Officer  
William Lansdowne, Chief of Police  
Judy Von Kalinowski, Human Resources Director  
Ken Whitfield, City Comptroller



**Travel Expenses Summary**  
**Mayor's SDPD Security Detail**  
**Trip: Paris, France 6/21/13 - 6/26/13**

<i>Human Resources Credit Card</i>	\$16,549.20
<i>SDPD Credit Card 1</i>	\$1,661.49
<i>SDPD Credit Card 2</i>	\$1,725.49
<i>Reimbursable Expenses</i>	\$1,643.34
<b>Total</b>	<b>\$21,579.52</b>

Attachment 2  
Human Resources  
Credit Card



U.S. BANCORP SERVICE CENTER  
P. O. Box 6343  
Fargo, ND 58125-6343



HUMAN RESOURCES

ACCOUNT NUMBER \_\_\_\_\_  
STATEMENT DATE 06-24-13  
TOTAL ACTIVITY \$ 16,572.80

000005268 1 AT 0.384 106481175460710 P

"MEMO STATEMENT ONLY"  
DO NOT REMIT PAYMENT

HUMAN RESOURCES  
1200 3RD AVE, STE 1316  
SAN DIEGO CA 92101-4109

As of May 31, 2013 U.S. Bank National Association ND is merging into U.S. Bank National Association. This merger will have no effect upon the services you receive from U.S. Bank.

We certify that all purchases listed on this statement, unless annotated to the contrary, are true, correct and for official business only. Payment is authorized.

Cardholder \_\_\_\_\_ Date \_\_\_\_\_ Approver \_\_\_\_\_ Date \_\_\_\_\_

NEW ACCOUNT ACTIVITY						
POST DATE	TRAN DATE	TRANSACTION DESCRIPTION		REFERENCE NUMBER	MCC	AMOUNT
06-19	06-17	UNITED	0162370338734 800-932-2732 TX DEPARTURE: 06-21-13	24692163169000769906500	3000	8,231.10
06-19	06-17	UNITED	0162370338735 800-932-2732 TX JR DEPARTURE: 06-21-13	24692163169000769906518	3000	8,231.10
06-19	06-17	UNITED	0162927840697 800-932-2732 TX RESERVE DEPARTURE: 06-21-13	24692163169000770728844	3000	25.00
06-19	06-17	UNITED	0162927840898 800-932-2732 TX RESERVE DEPARTURE: 06-21-13	24692163169000770728851	3000	25.00

Default Accounting Code: 1313000013			
CUSTOMER SERVICE CALL  800-344-5696	ACCOUNT NUMBER		ACCOUNT SUMMARY
	STATEMENT DATE 06-24-13	DISPUTED AMOUNT \$ .00	PREVIOUS BALANCE \$ .00 PURCHASES & OTHER CHARGES \$ 16,572.80
SEND BILLING INQUIRIES TO:  C/O U.S. BANCORP SERVICE CENTER, INC U.S. BANK NATIONAL ASSOCIATION ND P.O. BOX 8335 FARGO, ND 58125-8335	AMOUNT DUE \$ 0.00 DO NOT REMIT		CASH ADVANCES \$ .00 CASH ADVANCE FEE \$ .00 CREDITS \$ .00 TOTAL ACTIVITY <del>-\$ 16,572.80</del>



Account Name:	
Company Name:	HUMAN RESOURCES
Account Number:	
Statement Date:	06-24-13

NEW ACCOUNT ACTIVITY						
POST DATE	TRAN DATE	TRANSACTION DESCRIPTION	REFERENCE NUMBER	MCC	AMOUNT	
06-19	06-17	UNITED 0162927840700 800-932-2732 TX /BULKHEADPARTURE: 06-21-13	24692163169000770728869	3000	13.00	
06-19	06-17	UNITED 0162927840701 800-932-2732 TX /BULKHEADPARTURE: 06-21-13	24692163169000770728877	3000	24.00	
<del>06-21</del>	<del>06-21</del>	<del>NATL STGNT CLEARINGHOUSE 700-742-4200 VA PUR ID: 87120285 TAX: 0.00</del>	<del>24240700472200874202050</del>	<del>8600</del>	<del>13.45</del>	
<del>06-21</del>	<del>06-21</del>	<del>NATL STGNT CLEARINGHOUSE 700-742-4200 VA PUR ID: 87120295 TAX: 0.00</del>	<del>24240700472200874202050</del>	<del>8600</del>	<del>9.95</del>	

Attachment 2  
SDPD Credit Card 1



U.S. BANCORP SERVICE CENTER  
P. O. Box 6343  
Fargo, ND 58125-6343



POLICE-ADMIN

ACCOUNT NUMBER \_\_\_\_\_  
STATEMENT DATE 07-22-13  
TOTAL ACTIVITY \$ 1,661.49

000007649 1 AT 0.384 106481215950502 P

"MEMO STATEMENT ONLY"  
DO NOT REMIT PAYMENT

POLICE ADMIN  
1401 BROADWAY  
MS 700A  
SAN DIEGO CA 92101-5710

As of May 31, 2013 U.S. Bank National Association ND is merging into U.S. Bank National Association. This merger will have no effect upon the services you receive from U.S. Bank.

We certify that all purchases listed on this statement, unless annotated to the contrary, are true, correct and for official business only. Payment is authorized.

Cardholder \_\_\_\_\_ Date \_\_\_\_\_ Approver \_\_\_\_\_ Date \_\_\_\_\_

NEW ACCOUNT ACTIVITY					
POST DATE	TRAN DATE	TRANSACTION DESCRIPTION	REFERENCE NUMBER	MCC	AMOUNT
06-28	06-28	HILTON TREMBLAY EN F (FOREIGN CURRENCY) 1,242.25 EUR 06/28	74973003178317821108582 (RATE) 0.7477	3504	1,661.49

Default Accounting Code: NO DAC			
CUSTOMER SERVICE CALL  800-344-5696	ACCOUNT NUMBER		ACCOUNT SUMMARY
	STATEMENT DATE	DISPUTED AMOUNT	PREVIOUS BALANCE \$ .00
SEND BILLING INQUIRIES TO:  C/O U.S. BANCORP SERVICE CENTER, INC U.S. BANK NATIONAL ASSOCIATION P.O. BOX 6335 FARGO, ND 58125-6335	AMOUNT DUE:  \$ 0.00  DO NOT REMIT		PURCHASES & OTHER CHARGES \$ 1,661.49
			CASH ADVANCES \$ .00
			CASH ADVANCE FEE \$ .00
			CREDITS \$ .00
		TOTAL ACTIVITY \$ 1,661.49	



CITY OF SAN DIEGO TRAVEL EXPENSE REPORT

1. NAME OF TRAVELER		2. TITLE PO II Detective - CHIEF		3. DEPT NO. 110	
4. EVENT EXECUTIVE PROTECTION		5. BENEFITS TO BE DERIVED BY THE CITY THROUGH ATTENDANCE Bodyguard to Mayor's Detail			
6. DATE(S) OF MEETING 06/21/13 - 06/26/13		7. DEPARTURE DATE 06/21/13	8. RETURN DATE 06/26/13	9. DESTINATION Paris, France	
10. TRAVEL ADVANCE (COMPLETE BOXES 1 - 10, 12-15, 28) <input type="checkbox"/>		12. ASSESSMENT FEE		0.00	
11. FINAL TRAVEL REPORT (COMPLETE BOXES 1 - 9, 11, 16 - 28) <input checked="" type="checkbox"/>		13. LODGING		0.00	
		14. PER DIEM		0.00	
		15. TOTAL ADVANCE REQUESTED		\$0.00	

F I N A L T R A V E L R E P O R T	DAY	SUNDAY	MONDAY	TUESDAY	WED	THUR	FRIDAY	SATURDAY	TOTAL
	16. DATES	06/23/13	06/24/13	06/25/13	06/26/13		06/21/13	06/22/13	
17. TRANSPORTATION							8269.10		8269.10
18. TAXIS/SHUTTLE									0.00
19. LODGING		323.20	323.20	323.20			323.21	323.21	1,616.02
20. TELEPHONE/INTERNET									0.00
21. PERDIEM		162.00	162.00	162.00	121.50		121.50	162.00	891.00
22. LESS: MEALS PROVIDED								45.47	-45.47
23. REGISTRATION									0.00
24. OTHER									0.00
TOTALS		485.20	485.20	485.20	121.50	0.00	87144.81	439.74	10730.64

SIGNED <i>Stacy M. Roberts</i> Date 7/26/13	25. LESS: TRAVEL ADVANCE	0.00
	26. LESS: DIRECT PAID EXPENSES	885.12
	27. LESS: RENTAL	0.00
	DUE CITY (DCR # _____)	0.00
	DUE TRAVELER	\$845.53

APPROVED  
*[Signature]*  
Date 7/24/13

FINAL TRAVEL EXPENSE REPORT MUST BE FILED WITHIN THREE DAYS AFTER COMPLETION OF TRIP.  
Attach original receipts for all expenses claimed except Per diem.

FM-1312 (Rev 01/09) gh

Fiscal Year 2013	HCM Refund	G/L Acct. # 512072	CostCenter# 1914000001	Fund # 100000
Line	Instructions			
12	Advanced transportation includes airfare, train tickets, and quoted rental car fees only.			
13 & 19	Every effort must be made to secure lodging within the U.S. General Services Administration Per diem guidelines established. If there are no hotels available at per diem, an appointing authority may authorize or approve a higher rate. Lodging taxes are not included in the CONUS per diem rate. A printout of the current GSA Per Diem rate for the destination must be attached.			
14 & 21	Per diem must be reduced by any meals included in the registration fees for an event. 75% of the Meals & Incidental Expense (M&IE) is allowed on the first and last days of travel. A printout of the current GSA Per diem rate for the destination must be attached.			
17	Transportation includes airfare, train tickets, rental cars, and mileage. Mileage is reimbursed through payroll via a completed form AC-1145, Mileage Report. A copy of the completed AC-1145 must be attached to the expense report. Transportation expense paid directly by the City should also be included here.			
20	Telephone/Internet includes business phone calls, business use internet access fees and wireless internet fees, and personal calls not to exceed \$10/day.			
22	M&IE per diems must be reduced for meals included in the registration fees for an event. The GSA website (www.gsa.gov/mie) provides a breakdown of breakfast, lunch, and dinner components of the maximum daily reimbursement rates for meals and incidentals.			
23	Include registration paid directly by the City.			
26	Direct paid expenses should include all expenses paid directly by the City; airfare, registration, etc.			
27	Rental car charges must be included here (and on line 16). Provide receipt including coupons if applicable. Purchase of collision or physical damage coverage insurance is not recommended when employees are renting vehicles from commercial rental companies.			

\*\*TRANSPORTATION NOT BOOKED BY POLICE DEPARTMENT

CITY OF SAN DIEGO TRAVEL EXPENSE REPORT

1. NAME OF TRAVELER		2. TITLE		3. DEPT NO.	
4. EVENT		5. BENEFITS TO BE DERIVED BY THE CITY THROUGH ATTENDANCE			
EXECUTIVE PROTECTION		Bodyguard to Mayor's Detail			
6. DATE(S) OF MEETING		7. DEPARTURE DATE	8. RETURN DATE	9. DESTINATION	
06/21/13 - 06/26/13		06/21/13	06/26/13	Paris, France	

10. TRAVEL ADVANCE (COMPLETE BOXES 1 - 10, 12-15, 28)		A D V A N C E	12. ASSESSMENT FEE		0.00
			13. LODGING		0.00
			14. PER DIEM		0.00
11. FINAL TRAVEL REPORT (COMPLETE BOXES 1 - 9, 11, 16 - 28)			15. TOTAL ADVANCE REQUESTED		\$0.00

F I N A L  T R A V E L  R E P O R T	DAY	SUNDAY	MONDAY	TUESDAY	WED	THUR	FRIDAY	SATURDAY	TOTAL
	16. DATES	06/23/13	06/24/13	06/25/13	06/26/13		06/21/13	06/22/13	
17. TRANSPORTATION							8280.10		8280.10
18. TAXIS/SHUTTLE									0.00
19. LODGING		323.20	323.20	323.20			323.21	323.21	1,616.02
20. TELEPHONE/INTERNET								16.28	16.28
21. PERDIEM		162.00	162.00	162.00	121.50		121.50	162.00	891.00
22. LESS: MEALS PROVIDED				93.19					-93.19
23. REGISTRATION									0.00
24. OTHER									0.00
TOTALS		485.20	485.20	392.01	121.50	0.00	8724.81	501.49	10710.21

28. I certify the foregoing statement is correct.		25. LESS: TRAVEL ADVANCE		0.00
Signed <i>Stacy M. Bluffs</i> Date 7/20/13		26. LESS: DIRECT PAID EXPENSES		9912.40
Approved <i>[Signature]</i> Date 7/26/13		27. LESS: RENTAL		0.00
		DUE CITY (DCR # _____)		0.00
		DUE TRAVELER		\$797.81

FINAL TRAVEL EXPENSE REPORT MUST BE FILED WITHIN THREE DAYS AFTER COMPLETION OF TRIP.  
Attach original receipts for all expenses claimed except Per diem.

FM-1312 (Rev 01/09) gh	Fiscal Year 2013	HCM Refund	GL Acct. #	CostCenter#	Fund #
			512072	1914000001	100000
Line	Instructions				
12	Advanced transportation includes airfare, train tickets, and quoted rental car fees only.				
13	Every effort must be made to secure lodging within the U.S. General Services Administration Per diem guidelines established. If there are no hotels available at per diem, an appointing authority may authorize or approve a higher rate. Lodging taxes are not included in the CONUS per diem rate. A printout of the current GSA Per Diem rate for the destination must be attached.				
14 & 21	Per diem must be reduced by any meals included in the registration fees for an event. 75% of the Meals & Incidental Expense (M&IE) is allowed on the first and last days of travel. A printout of the current GSA Per diem rate for the destination must be attached.				
17	Transportation includes airfare, train tickets, rental cars, and mileage. Mileage is reimbursed through payroll via a completed form AC-1145, Mileage Report. A copy of the completed AC-1145 must be attached to the expense report. Transportation expense paid directly by the City should also be included here.				
20	Telephone/Internet includes business phone calls, business use internet access fees and wireless internet fees, and personal calls not to exceed \$10/day.				
22	M&IE per diems must be reduced for meals included in the registration fees for an event. The GSA website (www.gsa.gov/mie) provides a breakdown of breakfast, lunch, and dinner components of the maximum daily reimbursement rates for meals and incidentals.				
23	Include registration paid directly by the City.				
26	Direct paid expenses should include all expenses paid directly by the City; airfare, registration, etc.				
27	Rental car charges must be included here (and on line 16). Provide receipt including coupons if applicable. Purchase of collision or physical damage coverage insurance is not recommended when employees are renting vehicles from commercial rental companies.				

\*\*TRANSPORTATION NOT BOOKED BY POLICE DEPARTMENT