



# Richmond City Council

The Voice of the People

Richmond, Virginia

## Office of the Inspector General

November 25, 2024

Mr. Lincoln Saunders  
Chief Administrative Officer  
City of Richmond

The Office of the Inspector General (OIG) completed an investigation within the City of Richmond's Office of Elections. The OIG received an allegation of misconduct, including nepotism, from the General Registrar and referred the issue of nepotism to the City of Richmond Department of Human Resources. This report presents the results of the investigation.

### **Authority:**

1. In accordance with the Code of Virginia, §15.2-2511.2, the Inspector General is authorized to investigate all allegations of fraud, waste, and abuse.
2. City of Richmond Code 2-214 authorizes the Office of the Inspector General to conduct criminal, civil, and administrative investigations relating to the municipal affairs of the City involving fraud, waste and abuse.

### **Background:**

The local Electoral Board appoints the General Registrar who serves a four-year term. The General Registrar appoints Deputy Registrars, and the local Electoral Board sets the Deputy Registrar's term; all other employees of the Office of Elections are employed by the General Registrar as outlined in Virginia State Code §24.2-112. Virginia State Code §24.2-122 states, "Members of electoral boards, registrars, and officers of election shall serve the Commonwealth and its localities in administering the election laws. They shall be deemed employees of the county or City they serve except as otherwise specifically provided by state law." Employees with the City of Richmond Office of Elections are generally governed by City of Richmond Policies and Departmental Procedures for all activities not directly related to the administration of an election.

**Allegations:**

1. The General Registrar committed waste and abuse by purchasing a Ford Explorer for the Office of Elections on or about February 24, 2023, without authorization from the Fleet Management and removed the city logos from the vehicle in violation of the Department of Public Works Fleet Management Policies and Procedures Manual.

Facts: The General Registrar purchased a Ford Explorer in February 2023 to be used by the Office of Elections and had the city logo removed from the vehicle. It was confirmed through city documents that the car purchase went through appropriate city procedures. It was also confirmed that the City Fleet Manager authorized city logos to be removed from the vehicle at the request of the General Registrar due to safety concerns. This approval follows the Department of Public Works Fleet Management City Policies and Procedures Manual, Section 2, V. Exemptions to Marking/Identification Program.

Allegation No. 1: **Unsubstantiated**.

2. The General Registrar abused the use of a city vehicle when they used it as a take-home vehicle, conducting personal errands, and to transport non-city personnel, in violation of City Administrative Regulations 6.2 Motor Pool and City Vehicle Usage and the Department of Public Works Fleet Management City Policies and Procedures Manual.

Facts: The General Registrar never completed the appropriate forms or sought approval to use the vehicle as a take-home vehicle. The General Registrar was interviewed and admitted to taking the city vehicle home without authorization and using it for personal errands such as going to the cleaners and picking up their child from school.

No personal use of a city vehicle is authorized per City Administrative Regulation 6.2 which states, "No personal use of city-owned vehicles is allowed." Additionally, Administrative Regulation 6.2 prohibits the transport of non-city employees when not performing assigned duties. "City vehicles may be used for transporting non-city employees during normal business hours and in an official performance of assigned duties." The General Registrar admitted transporting non-city personnel outside business hours and using the city vehicle for personal use. This constitutes waste and abuse of a City asset.

Allegation No. 2: **Substantiated**.

3. The General Registrar wasted city funds by contracting three VCU students to paint murals on the lobby walls in a leased space for \$7,500, as well as purchasing artwork between February 21, 2023, and December 6, 2023, in violation of the Code of the City of Richmond, Chapter 21 (Public Procurement) Article I, Section 21-3 Exemptions, (a)(16) Sculptures, paintings or other works of art, Department of Procurement Services Policy 55 Exemption Purchases, Department of Procurement Services Policy 56 Price Reasonable Determination.

Facts: The General Registrar hired three students to paint murals in the lobby of a city-leased building/facility. Each student was paid \$2500 by check using Invoice Payment Forms, totaling \$7,500. Between February 21, 2023, and December 6, 2023, the General Registrar made eight purchases with their government P-Card for 12 pieces of artwork from a local art center, totaling \$8,793.50. The prices ranged from \$175 to \$1,800. None of the purchases went through the required DPS procedures to purchase exempted artwork.

Artwork is an item that is exempt from the procurement purchasing process by the Code of the City of Richmond, Chapter 21 (Public Procurement) Article I, Section 21-3 Exemptions. However, such purchases are subject to price reasonableness determination. DPS Policy 56 A.1. states, "The Using Agency shall provide a written price reasonableness determination when: g. non-competitive procurements, such as exemption purchase, demand payment, etc." The Office of Elections should have provided a written price reasonableness determination. DPS has a process in their policy entitled Artist Work Contract Guidelines Under Exempt Payment. The first section of the guidelines is a Pre-requisite; it contains three items:

1. The agency must ensure the artist is registered as a supplier in CORERP (City of Richmond Enterprise Resource Planning) – Rapids.
2. The agency requester must coordinate with the City Attorney to develop an Artist contract (a unique contract created by the Office of the City Attorney).
3. Using Agency requester must ensure Terms & Conditions of the contract are agreed by the Artist.

Regarding the VCU students that were hired for the mural, pre-requisite 1 was met, but pre-requisites 2 and 3 still needed to be met. As there was no price reasonableness determination and the murals were painted on leased space, this expenditure constitutes a waste of City funds.

Using these same pre-requisites, the artwork purchased by the General Registrar did not meet any of the requirements, nor were the proper guidelines followed, therefore constituting a waste of City funds.

**Allegation No. 3: Substantiated.**

4. The General Registrar wasted government resources between July 12, 2023, and December 6, 2023, by purchasing high-quality, high-priced furniture to furnish the General Registrar's and other employee's offices in violation of the Code of the City of Richmond, Chapter 21 (Public Procurement), Article I, Section 21.1 Purpose, (4) Obtain high-quality goods at the lowest price within the specified time, Department of Procurement Services Policy 56 Price Reasonable Determination.

Facts: The General Registrar purchased the following items from LaDiff, Bassett, Value City, and Wayfair using the government P-Card.

- In July 2023, the General Registrar purchased a leather sofa for \$2,189.95, an oak office desk for \$1,159, an oak rolling file cabinet for \$699, an oak file cabinet for \$1,079, a small rectangular table for \$2,328.15 and delivery for a total of \$7,585.05 from LaDiff.
- In December 2023, the General Registrar purchased two smoke glass shelving units with delivery for \$2,029.97 from LaDiff.
- In August 2023, the General Registrar purchased four leather Parson Chairs for the office table for \$4,119 Bassett.
- In October 2023, the General Registrar purchased swivel chairs for his office for \$769.97 Value City.
- In November 2023, the General Registrar purchased a full-length floor stand mirror for his office for \$143.09 from Wayfair.
- Total office furniture purchases from July 2023 to November 2023 were \$14,647.08.

DPS Policy 56 A.1. states, "The Using Agency shall provide a written price reasonableness determination when: b. the prices offered do not appear to be fair and reasonable." This written determination was not done. The City of Richmond records were reviewed, and the General Registrar only made City of Richmond purchases at LaDiff and Bassett. The General Registrar was provided with several lower-priced furniture options; however, the office chose the highest-priced vendors.

The General Registrar wasted government resources between July 12, 2023, and December 6, 2023, by purchasing high-quality, high-priced furniture to furnish the Registrar's and other employee's offices in violation of the Code of the City of Richmond, Chapter 21 (Public Procurement), Article I, Section 21.1 by failing to purchase lower-priced furniture options.

**Allegation No. 4: Substantiated.**

5. The General Registrar committed fraud on or about December 10, 2021, by using the Government Purchase Card (P-Card) to pay for the food at the Voter Registrars Association of Virginia's (VRAV) Region 3 meeting, which consisted of non-city employees. The General Registrar was reimbursed for the expenses by VRAV, but did not apply the reimbursement to their government P-Card balance. The General Registrar wasted government resources by overpaying the authorized per diem rate for lunches on or about December 10, 2021. The General Registrar committed fraud on or about January 18, 2022, by submitting a Purchasing Card Meal Documentation Form to the Department of Procurement Services with an inaccurate account of the number of attendees for the lunch. These allegations violate Procurement Services Policy 15, Procurement Card Program Meals.

Facts: While the General Registrar was the chair of Region 3 of the Voter Registrars Association of Virginia (VRAV), a private organization, the General Registrar hosted a meeting on December 10, 2021, at a local restaurant. The General Registrar paid the lunch bill for all attendees with their government P-Card for \$976.50. On January 11, 2022, The General Registrar submitted a request form for reimbursement from the VRAV. The General Registrar stated in the request

that the local jurisdiction did not cover the luncheon costs. The VRAV sent the General Registrar a \$735.84 check (the amount left in the account for the year). However, the General Registrar did not cash the check. When questioned, the General Registrar responded, "The city never got their money?" The General Registrar stated they were unaware of why the reimbursement form was done. This constitutes a waste of City funds that were not reimbursed and were not authorized under City policy.

The government P-Card policy allows meals to be purchased at the authorized per diem rate for the local area. The GSA per diem rate in December 2021 was \$17.00 for lunch per person. The General Registrar submitted a receipt for the VRAV luncheon for 25 people at \$31.00 per meal, \$14 above the authorized amount allowed by city policy for meals. This constitutes a waste of City funds by greatly exceeding the per diem meal rate.

On January 13, 2022, the Department of Procurement Services requested the General Registrar to provide their office with the Purchasing Card Meal Documentation Form, which is required for each meal purchased using government funds, per Procurement Services Policy 15. On January 18, 2022, the General Registrar submitted a Purchasing Card Meal Documentation Form to the Department of Procurement Services.. The General Registrar falsely stated on the required government form that there were 19 attendees whose meals were charged on the government P-Card. However, the receipt shows that 25 meals were purchased. This constitutes fraud because General Registrar intentionally approved and submitted a document with false information about the number of attendees in comparison with the meal amount purchased.

**Allegation No. 5: Substantiated**

6. The General Registrar committed fraud on or about December of 2022, using their government P-Card to pay for the VRAV Region 3 meeting lunch and falsifying the government P-Card Meal Documentation Form. Altering information on the government P-Card documentation form violates Procurement Services Policy 15 Procurement Card Program Meals and City of Richmond Administrative Regulation 1.6.

Facts: The General Registrar used their government P-Card to pay for the Region 3 Voter Registrars Association of Virginia (VRAV) meeting in December 2022. The meeting was held at the Richmond Office of Elections. The government P-Card Meal Documentation Form was filled out; however, the only names listed were city employees, not election officials from other jurisdictions that were present for the meeting. The justification for the expense was listed on the Procurement document as employee training; however, the purchase was lunch for non-city employees. Several employees interviewed said there was no training for employees. After the district meeting, the employees were allowed to get the leftovers. Registrars from other localities questioned the General Registrar using the government P-Card. The General Registrar responded by e-mail, saying it was related to city business when it was not.

The General Registrar did not seek pre-approval of the purchase from their approver, a contracting officer from Procurement Services, as required by DPS Policy 15 Procurement Card Program, Meals Section, which states, "Meals are permitted on the P-Card. Each meal must be pre-approved by the Cardholder's approver and be accompanied by the City of Richmond P-Card Meal Documentation Form." Providing false information on the Meal Documentation Form the City of Richmond Administrative Regulation 1.6 Business Conduct, II.C., Expectations on Professional Conduct, which states, "Maintain the highest degree of honesty and integrity." This constitutes fraud due to the General Registrar intentionally approving and submitting a document with false information about the number of attendees for the meeting, as well as the purpose for ordering the meal as it was VRAV meeting and not the employee training that was listed.

**Allegation No. 6: Substantiated.**

7. On or about August 2, 2023, the General Registrar abused the government P-Card when they purchased alcoholic beverages in violation of Procurement Services Policy 15—Procurement Card Program (P-Card).

Facts: The General Registrar's government P-Card was used to pay incidental room expenses for two employees at a conference in the amount of \$261.70. The itemized statement was obtained from the resort, showing the purchases were for alcoholic beverages and food. DPS Policy 15, Travel Specific Purchases, states alcoholic beverages are "non-allowable expenses."

This constitutes a waste of City funds as the expenditure is not allowable or reimbursable under City policy and is not for a legitimate business purpose.

**Allegation No. 7: Substantiated.**

8. On or about March 28, 2024, the Deputy General Registrar wasted government resources by intentionally not documenting leave for an employee who was absent from work in violation of the City of Richmond Administrative Regulation 4.8, Leave Policy.

Facts: An employee of the Office of Elections was rarely in the office and was absent for an extended period but was still being paid by the City of Richmond. The employee started work with the city on May 8, 2022. The employee's timecards were checked between then and July 16, 2024; the employee has taken 8 hours of bereavement leave, 28.5 hours of sick leave, and 24 hours of vacation leave. The city employee's ID card was checked for entry into the building and showed sporadic usage compared to other employees. The employee's city ID card has not been used to enter the facility since March 27, 2024. The investigator attempted to contact the employee by phone and e-mail, but there was no response.

The investigator interviewed the employee's current and previous supervisors. The Deputy General Registrar approves the employee's timecard. The supervisors said that the employee became ill and was having severe health issues. Neither supervisor knew about the employee's

leave situation as they did not handle the employee's timecard. The employee's current supervisor said that the employee has their city laptop at home, and the supervisor can occasionally give the employee some work programming election equipment but has not seen the employee in several months.

The investigator questioned the Deputy General Registrar about the employee. The Deputy General Registrar initially stated that the employee worked from home; however, the Deputy General Registrar could not verify that the employee worked 40 hours a week. The Deputy General Registrar also stated that the employee was in the hospital. The Deputy General Registrar said, "We were trying to work with the employee considering their special circumstances due to their illness and are working with Human Resources."

The Human Resources Business Partner was unaware of the situation and had not heard of the employee. The Human Resources Business Partner also stated that the Deputy General Registrar had not contacted them regarding this employee. After the investigator discussed the issue about this employee, the Deputy General Registrar e-mailed the Human Resources Business Partner to inform them that the employee had been in the hospital for the last two weeks and needed guidance on FMLA. The employee's timecard for those two weeks shows no leave taken, and the employee was paid as if they had worked.

City of Richmond Administrative Regulation 4.8 Leave Policy IV. Responsibility states, "Supervisors – Supervisors are responsible for managing leave requests. This includes approval/disapproval of leave requests. Employees – Employees are responsible for abiding by the requirements and processes of this policy. Employees shall not request leave for which they do not have available leave accrual balance to cover without the written consent of the appointing authority/department head or designee."

The Deputy General Registrar failed to manage the employee's leave as their supervisor, which requires leave to be taken for the employee's absences. The employee also failed to submit requests for leave and document the leave on the timecard. This constitutes abuse and fraud because the Deputy General Registrar intentionally approved false time entries which resulted in the employee being paid when the employee was not working.

**Allegation No. 8: Substantiated.**

9. The Deputy General Registrar abused their authority and wasted government resources on or about January 18, 2024, by entering a contract with a security company in violation of the Code of the City of Richmond, Chapter 21 (Public Procurement) Section 21-7, Unauthorized purchases., and incurring unnecessary expenses.

Facts: On January 18, 2024, the Deputy General Registrar signed a contract with a security company without going through the proper procurement process. At that time the City had a security company under contract. The initial contract with the registrar's office was to provide a security guard at the rear door during the 45-day early voting period at a billed rate of \$50 per

hour. The Office of Elections hired a new company, citing issues with security guards previously assigned by the city-contracted provider. On January 30, 2024, the Deputy General Registrar signed an addendum to the contract for personal protection services (PPS) for the General Registrar at a billed rate of \$85 per hour, plus expenses per Certified PPS Professional. On the same day, the Deputy General Registrar signed an addendum for the security company to provide six classes for emergencies for \$26,400. Between January 29, 2024, and May 14, 2024, the security company invoiced the city \$200,144.53 through purchase orders, and \$8,650 was paid by government P-Card.

The invoices predate the creation of the purchase orders. The Office of Elections could not pay the security company for the last three invoices and other vendors because budgeted funds were depleted, and the General Registrar had to request an additional allotment from City Council.

Investigators reviewed the invoices submitted by the security company. Charges for the following were found:

- Security services for \$52,415 at \$50 per hour.
- Six classes dealing with emergencies for \$26,400.
- Standard Operating Procedure (SOP) development for \$17,000.
- Personal protection services for \$66,753.05 at \$85 per hour.
- Equipment purchases and rental (radios, metal detectors, AEDs, and medical kits) for \$16,900.
- Investigative services for \$8,363.75.
- Expense reimbursements for \$11,154.15.
- SUV rental for \$818.58
- Early termination of contract fee of \$26,730.
- Equipment prep for \$340.
- Retainer fees of \$8650.

Security services were provided at the rear door during the early voting and the front door when the temp employee acting as a security guard left in April 2024. Two Personal Protective Service guards accompanied the General Registrar to meetings and activities outside the office, outreach activities, lunch, and events such as a marathon race, a high school basketball tournament at the VCU Siegel Center, and a 4-day trip to an out-of-town conference where the security company was paid \$24,726.15 in total to include their hotel rooms and hours worked while accompanying the General Registrar. A total of \$14,969.85 was paid or invoiced for this conference: \$2,933.64 was paid by the government P-Card, \$8,456.11 was invoiced to the city by the security company, and \$3,580.10 was paid by the city checks.

The Personal Protective Services consisted of a dedicated plainclothes guard for the General Registrar during regular Monday through Friday work hours and on weekends, evenings, or special events as needed when the General Registrar was present. The security company director said that when the client (General Registrar) goes out in public, their SOP is for two Personal Protection Services guards to be with him.



The rationale for needing personal protection was because of threats and security risks as the General Registrar. The security company director said the decision for Personal Protection Services was based on several factors, including a general nationwide attitude towards election officials, the actions of two former employees, and threats received by the Office of Elections. The security company director and General Registrar were advised of alleged threats against the office by the Deputy General Registrar; however, the General Registrar never saw any written threats.

The threats received were generalized and not against anyone specific in the office. The Deputy General Registrar told investigators these were written synopses of threats. The alleged threats involved a former employee before being terminated, an incident of domestic violence between co-workers, three individuals accessing the building through an unlocked and unattended rear door, ultimately entering the administrative suite, and a threat they said came September 7, 2023, from an employee at City Hall alleging a phone call was received on a recorded line; however, this recorded conversation was never recovered and the alleged individual was not located as being a current employee.

The General Registrar said they ordered Personal Protective Services for the safety of the office and for public events where their presence was advertised. The General Registrar said they did not know it was \$85 an hour for the guard; they thought it was a blanket cost contract for security. The Electoral Board meeting date was checked; it was February 13, 2024. The addendum to add personal protective services for the General Registrar was signed on January 31, 2024; the Office of Elections did not report these alleged threats to the Richmond Police Department.

The charges for investigative services fall into two categories. The first charge fell under Security Assessment and Review of Events, which showed 11 entries from April 15, 2024, through April 24, 2024, for \$3,952.50. The second charge showed that \$4,411.25 was spent on an investigation involving possible election interference. These charges included background checks, affidavit writing, internet research, phone calls, and going over case evidence. The security company director stated that the General Registrar asked them to investigate allegations that two former employees were attempting to interfere with Officers of Elections. The security director said the General Registrar told them the City Attorney approved the investigation for the City of Richmond. The City Attorney was not consulted, nor was the investigation approved.

The Office of Elections, the General Registrar, and the Deputy General Registrar did not have reasonable grounds for contracting for personal protection services based on the information provided to justify the expenditures. The alleged threats were non-specific to the General Registrar, and the danger received over the phone by the Deputy General Registrar cannot be verified. The General Registrar's assertion that the former employee came to the February Local Electoral Board meeting as a catalyst for the services is invalid, as the services were contracted before that meeting on January 30, 2024. Neither the General Registrar nor the Deputy General

Registrar reported any alleged threats to the Richmond Police Department, resulting in a waste of government funds.

The authorization of a private security company to investigate election interference is a waste of government funds as the Code of Virginia §24.2-1019, Complaints and allegations concerning election law offenses states, "Any complaint or allegation concerning unlawful conduct under this title shall be filed with the attorney for the Commonwealth of the county or city in which the alleged violation occurred." The code requires complaints of election interference to be filed with the Commonwealth Attorney's Office. Therefore, authorizing a private company instead of following the state code wastes government funds.

The Code of the City of Richmond, Chapter 21, Public Procurement, Section 21-7 vests authority for approval of city contracts with the Director of Procurement Services stating, "Except as provided in this chapter, no official, elected or appointed, or any employee shall purchase or contract for any goods, services, insurance, or construction within the purview of this chapter other than by and through the Director. Any purchase order or contract made contrary to this chapter, or any purchase order or contract made when sufficient funds are unavailable is not approved, and the City shall not be bound thereby." The Director of DPS did not authorize this contract, nor was the Deputy General Registrar delegated the authority to sign the contract. The Deputy General Registrar abused their authority by signing an unnecessary security contract without proper authorization.

**Allegation No. 9: Substantiated.**

10. The General Registrar abused their authority and wasted government resources on or about March 16, 2024, by having the City of Richmond pay for employees' hotel rooms to arrive one day early for a conference and paying guest fees (meals) for two Local Electoral Board members' guests at the government's expense in violation of the City of Richmond Administrative Regulation 6.4, Travel Policy.

Facts: The General Registrar, two Office of Elections employees, and two Local Electoral Board members attended the 2024 Virginia Electoral Board Association (VEBA) Conference at The Homestead Resort. The conference was for a day and a half. Three meals were provided on Monday, and breakfast was provided on Tuesday. The conference had a Sunday event for an extra charge, but none of the city employees were registered. Rooms were booked for The General Registrar, the two employees, and one Local Election Board member. The reservations started on Saturday and included a \$32 breakfast buffet charge. The conference began on Monday morning, and the city's travel policy would only allow a Sunday arrival. Per diem rates for this area are \$44.25 on travel days and \$59 on full days.

The Office of Elections paid the conference fees by check for the General Registrar, two employees, and the two Local Electoral Board members, for \$450 each. The office also paid two guest fees (which covered meals) for the board members' guests for \$338 each.

City of Richmond Administrative Regulation 6.8, Travel Policy states in Section I. Purpose, "This Administrative Policy provides guidelines for reimbursement of authorized travel expenses incurred while traveling on City business." Section III. Policy B states, "Travel expense accounts are open to the public and must be able to sustain the test of public review. Economy, prudence, and necessity are of primary concern when planning and paying for travel. Using city funds to accommodate personal comfort, convenience, and taste is prohibited. Travel costs should be limited to only expenses necessary for providing essential services to the city's citizens. Further, travelers and travel planners must seek ways to reduce the cost of essential travel. To lessen the funds requested on a Travel Advance, items such as registration fees, hotel accommodations, and airfare should be prepaid." The General Registrar abused their authority by allowing hotel rooms to be booked a day early and paying guest fees for non-city employees. These decisions wasted government funds by not meeting the standards of this policy regarding economy and prudence and were not necessary for providing essential services to the City and being official city business.

**Allegation No. 10: Substantiated.**

11. The General Registrar abused their authority and wasted government resources by having the City of Richmond pay a private security company to conduct criminal investigations regarding election interference in violation of the Code of Virginia §24.2-1019, Complaints and allegations concerning election law offenses.

**Facts:** The General Registrar authorized a contracted private security company to investigate possible election interference. This involved charges for background checks, affidavit writing, internet research, phone calls, and reviewing case evidence totaling \$4,411.25. The security company director said the General Registrar asked them to investigate allegations of two former employees attempting to interfere with Officers of Elections by encouraging them not to participate in future elections. The Director noted that the General Registrar had told them the City Attorney approved the investigations for the City of Richmond. The City Attorney was not consulted, nor was the investigation approved. The General Registrar denied speaking with the City Attorney and telling the security company director that the City Attorney authorized the investigation. The General Registrar did not contact law enforcement, the Commonwealth Attorney's Office, the Attorney General's Office, or the Virginia Department of Elections regarding any alleged threats but took it upon himself to use city funds to initiate a private investigation.

**Code of Virginia Code of Virginia §24.2-1019, Complaints and allegations concerning election law offenses, states,** "Any complaint or allegation concerning unlawful conduct under this title shall be filed with the attorney for the Commonwealth of the county or city in which the alleged violation occurred." **The General Registrar abused their authority and wasted City funds when they authorized an investigation into alleged election interference by a private security company when the statutory authority is vested in the Office of the Commonwealth's Attorney, constituting a waste of government funds.**

**Allegation No. 11: Substantiated.**

12. The General Registrar abused their authority and wasted government resources purchasing and consuming alcoholic beverages through a security contract and allowing city employees to consume alcoholic beverages during work hours in violation of the City of Richmond Administrative Regulation 4053, Substance Abuse Policy.

Facts: The Office of Elections contracted a security company to provide security for the building and personal protective services for the General Registrar. The security company would pay for expenses incurred by the General Registrar and invoice the city for payment. Several of the costs included the purchase of alcoholic beverages during work hours. The General Registrar admitted to the purchase and use of alcoholic beverages during work hours and employees of the Office of Elections, which were paid for by the security company. The security company director confirmed the purchase of alcoholic beverages and use by Office of Election employees, including the General Registrar. These purchases were invoiced by the security company to the City.

The General Registrar allowed alcoholic beverages to be purchased through the security contract, consumed alcoholic beverages during work hours, and allowed employees to consume alcoholic beverages during work hours in direct violation of City policy resulting in a waste of government funds.

**Allegation No. 12: Substantiated.**

13. The Deputy General Registrar abused their authority and wasted government resources on or about July 6, 2023, by purchasing a firearm and assorted security equipment in violation of the City of Richmond Code 19-335, Carrying firearms in certain places, City of Richmond Administrative Regulation 4.13, Violence in the workplace, Department of Procurement Services Policy 15 Procurement Card Program, and the General Registrar violated City of Richmond Administrative Regulation 1.1 Code of Ethics by placing the City of Richmond in a possible position of liability or financial loss for improperly hiring and arming a temporary agency employee.

Facts: The General Registrar used a temp employee as an armed security guard. The temp agency was unaware that this temp employee was being utilized as an armed guard. The temp agency stated that it was not licensed or insured to provide armed security guards, nor did the temp agency give a weapon to its employee. The gun that the temp employee used was purchased using a City P-Card. The Deputy General Registrar gave their P-Card to another City employee to buy a weapon and assorted security equipment for the temp employee. The General Registrar and the Deputy General Registrar approved the purchase of the weapon. The temp employee with the city employee, who had the Deputy General Registrar's P-Card, went to a local store, and the temp employee completed ATF Form 4473 using his name as the purchaser.

The Deputy General Registrar contacted the city's Security Manager about purchasing a handgun. The city's Security Manager advised the Deputy General Registrar not to buy the handgun. The General Registrar did not consult with the City Attorney's Office, Human Resources, or Risk Management before providing a private armed security guard. The temp employee worked as an armed security guard for the Office of Elections from July 6, 2023, to April 12, 2024. The city retained the weapon for proper storage after the OIG learned that the Deputy General Registrar purchased a gun with a government P-Card on or about May 15, 2024.

Code of the City of Richmond, Section 19-335, Carrying of firearms in certain places states, "No person shall possess, carry, or transport any firearms, ammunition, or components or combination thereof (i) in any building or part thereof, owned or used by the City, or by any authority or local government entity created or controlled by the City, for governmental purposes." Section iii. Exempts security guards contracted by or employed by the city. The employee was not contracted as a security guard and was not a city employee. City of Richmond Administrative Regulation 4.13, Violence in the Workplace, also restricts possession of firearms in city buildings, stating in Section II., A. Prohibited Activities and Behaviors, 2. "Use, possession or sale of any firearm or weapon on City property (including City parking lots)." The Deputy General Registrar abused her authority by purchasing a firearm to be used on city property. Government funds were wasted on a purchase that should not have been made. The Deputy General Registrar also violated Procurement Services Policy 15, Procurement Card Program (P-Card), Section 5.1.2\_Cardholders' Rules and Responsibilities by giving the government P-Card to another employee to purchase the firearm which states, "Cardholder is not permitted to share his/her P-Card with anyone including other COR employees, except as authorized in writing by Department/Agency Head."

The General Registrar's decision to have a temp employee provide armed security placed the City of Richmond in a position of liability and financial loss by having an untrained temporary employee provide security services which constituted an abuse of his authority. The hiring of a temporary employee and the purchase of a firearm and other security equipment constituted a waste of government funds.

**Allegation No. 13: Substantiated.**

14. The General Registrar abused their authority and wasted government resources between August 2, 2023, and November 13, 2023, by approving the remodeling of a leased building in violation of Department of Procurement Services Policy 14 Small Purchases, Department of Procurement Services Policy 53 Split Purchases, and DPS Policy 60, Competitive Sealed Bidding.

Facts: Between August 2, 2023, and November 13, 2023, The General Registrar approved the remodeling of their leased building. Carpet and flooring were replaced, wall repair was done, the interior was repainted, walls were reconstructed, a new door was installed in an existing wall, the bathroom in the General Registrar's office was remodeled with new fixtures and flooring, and electrical work was done. The contractor who previously worked on the building

for the landlord was used for the project. DPS inquired about invoices to be paid for this company. There was no documentation of three quotes being received for the work.

When the General Registrar asked the employee who managed the work, the employee told the General Registrar that the Office of Elections had to use the landlord's preferred contractor. Therefore, no bidding process was done. According to the lease, building maintenance is the landlord's responsibility. Any alterations or modifications must be approved by the landlord in writing. The landlord has a company to manage the building. The investigator questioned the project manager of the company that manages the building about the work the City of Richmond was doing in the building. The project manager stated that they did not approve these modifications. The project manager said if the city had sought approval, the landlord would have hired the contractor and pulled the permits themselves to ensure the management company had control of the process. The investigator checked for building permits, but no permits are on record for this project. It was found that the remodel work was structured to avoid the requirement of a bidding process. The project was split over twenty-one purchase orders, none of which were over the threshold to require bidding.

For example, one purchase order was for the purchase of the first-floor carpet. A second purchase order was for the labor to install the first-floor carpet. The same was done with the second-floor carpet. The twenty-one purchase orders totaled \$229,969.00; this requires a competitive bidding process through DPS for a building the city does not own. The Deputy General Registrar's responsibilities include managing the budget. When interviewed, they did not know how much was spent remodeling the building.

DPS Policy 14, Small Purchases, sets the delegated approving authority at a maximum of \$200,000. \$50,000 to \$200,000 requires a competitive bid process of three bidders, one of which should be a Minority Business Enterprise (MBE). This policy also states in Section A.2., "Requirements shall not be artificially divided to constitute a small purchase." The construction cost was split over twenty-one purchase orders, none over the \$50,000 threshold for non-competitive small purchases in violation of DPS Policy 53, Split Purchases, which states in Section 53-5.1, "Split Purchases. Knowingly splitting purchases to circumvent competitive procurement requirements is expressly prohibited. The placement of multiple orders within other than a reasonable period to one or more vendors for the same, like, or related goods or services may, after review of the facts, be considered a split purchase requiring corrective action and suspension or revocation of system approval authority. Proper planning and reasonable anticipation of ongoing purchase needs are the best ways to preclude potential split purchases. Using agencies should contact their DPS Contact in Procurement Services should they have any questions regarding split purchases." DPS Policy 60, Competitive Sealed Bidding, Section 60-5.1, Application states, "This policy applies if the cost of the goods, nonprofessional services, construction or insurance is expected to exceed the Small Purchases threshold, and the requirements can be defined so that the use an Invitation for Bids (IFB) is the selected method of procurement."

The General Registrar abused their authority and wasted government resources between August 2, 2023, and November 13, 2023, by approving the remodeling of a leased building in violation of Department of Procurement Services Policy 14 Small Purchases, Department of Procurement Services Policy 53 Split Purchases, and DPS Policy 60, Competitive Sealed Bidding.

**Allegation No. 14: Substantiated.**

15. The Deputy General Registrar abused their authority and wasted government resources by paying employees' college tuition using a government P-Card, violating Administrative Regulation 7.6, Tuition Assistance Policy.

Facts: College tuition was prepaid for two employees. The Deputy General Registrar's government P-Card was used in 2021 to make three payments for an employee's tuition to the University of Maryland Global Campus totaling \$3,598. The employee left the city within three months of the payment. Only two payments were credited back to the city, with an outstanding balance of \$1,512. Another employee's tuition was prepaid to attend Virginia Commonwealth University in 2022, totaling \$5,721; the Deputy General Registrar's government P-Card was used for this transaction. The General Registrar denied knowledge of this payment; however, they approved the purchase using the city's government P-Card Bank of America Works system.

City of Richmond Administrative Regulation 7.6, Tuition Assistance Policy, establishes the procedures for tuition assistance for employees—section II. E. 2. deals with conditions of upfront assistance, stating, "To qualify for upfront assistance, employees must demonstrate financial hardship. Approval for upfront assistance shall be at the discretion of the HR Director or designee." Section III.B. and C. state, "Applicants must complete and submit all HR-required tuition assistance program forms and provide them to the appointing authority and/or department head for approval. The appointing authority and/or department head shall review the proposed coursework to determine that it would benefit the employee professionally, would not interfere with position responsibilities, and that the employee meets the program requirements." "The appointing authority and/or department head shall forward the request to HR for review and HR Director approval." Section II.C.2. states, "If an employee is receiving educational benefits such as scholarships or other tuition assistance, the employee must exhaust those sources before applying for assistance from the City. City-provided assistance shall not exceed the difference between the amounts paid under the other resource and the total cost of the course(s)." There was no claim of financial hardship for the employees, and no requests were submitted to Human Resources for approval. The pre-payment of tuition by the Deputy General Registrar exceeded their authority and wasted city funds.

**Allegation No. 15: Substantiated.**

16. The General Registrar wasted government resources using their government P-Card to purchase food and meals above the local per diem rate in violation of the Department of Procurement Services Policy 15, Procurement Card Program.

Facts: The Office of Elections purchased food, primarily for employees. Most have been purchased at restaurants, some food at grocery stores for the office, and food trucks or catered events. These payments were made through the government P-Card, purchase orders, or checks through Invoice Payment Forms. In FY 2022, the office spent \$6,101.76 on food. In FY 2023, \$37,190.45 was spent on food. In FY 2024 through May 15, 2024, \$34,662.48 was paid. The government P-Card purchases for food were most often made by the General Registrar. Transactions were identified on the General Registrar's government P-Card that exceeds the per diem rate for lunches.

In the Meals Section, DPS Policy 15 Procurement Card Program states, "All meals must be at or below the area per diem rate as provided by the IRS, and all attendees must be included." These meal purchases above the local per diem rate constitute a waste of City funds.

**Allegation No. 16: Substantiated.**

17. An employee from the Office of Elections wasted government resources on or about September 20, 2023, to purchase personal items using a government P-Card, violating the Department of Procurement Services Policy 15, Procurement Card Program.

Facts: On September 20, 2023, an employee used the Administrative Assistant's government P-Card to purchase lingerie, a video game controller, and a nebulizer. The employee said the government P-Card number was saved on their computer from a prior work order. When they placed the personal orders on the city's Amazon account, they didn't realize it until after they bought the items. The employee went to the government P-Card holder and was told to return the lingerie but was allowed to keep the other items. The government P-Card could be accessed from their computer because they were using the city's tax-free Amazon account to make personal purchases, which has been done by several Office of Elections employees.

The purchase of personal items with a government P-Card and use of a government P-Card by a non-cardholder is prohibited in DPS Policy 15 Procurement Card Program, Section 5.1.2, Cardholders' Rules and Responsibilities which states, "Never use the P-Card for personal purchases under any circumstance" and, "Cardholder is not permitted to share his/her P-Card with anyone including other COR employees, except as authorized in writing by Department/Agency Head." These purchases constitute a waste of government funds.

**Allegation No. 17: Substantiated.**

18. The Deputy General Registrar wasted government resources between July 6, 2023, and January 14, 2024, purchasing unnecessary items violating City of Richmond Administrative Regulation 1.1, Code of Ethics.

Facts: The Deputy General Registrar used her government P-Card to purchase two automatic door openers at \$580 each in 2022, which had never been installed. Electrical circuit testing



supplies, a \$149 drywall cart, and a \$134.99 backpack garden sprayer were also purchased. These items are optional because building maintenance is the landlord's responsibility.

City of Richmond Administrative Regulation 1.1, Code of Ethics, states in Section III., B. Responsibilities of Employees, 1. "All City employees assume a public trust and should recognize the importance of high ethical standards within the specific department or organization they support. An employee shall avoid action, whether or not specifically prohibited by this administrative regulation, which might result in or create the appearance of the following: c. Impeding government efficiency or economy." This constitutes a waste of City funds as the expenditure is not required by the City for business purposes and was optional as maintenance is the responsibility of the landlord.

**Allegation No. 18: Substantiated.**

19. The General Registrar wasted government resources on or about February 7, 2024, by booking a hotel room and fuel for non-city businesses using their government P-Card, violating the Department of Procurement Services Policy 15, Procurement Card Program.

Facts: On February 7, 2024, the General Registrar booked a room at the Residence Inn Rosslyn in Arlington, VA, for February 8, 2024, for \$550.80 with their government P-Card. This was for one night only, and the room rate was above the GSA per diem rate of \$193. The comment entered in Works stated that it was for the General Registrar to attend an elections meeting. The General Registrar was asked about the trip. The General Registrar said they attended a conference hosted by the National Association of Secretaries of State and the National Association of State Elections Directors. The investigator contacted both organizations to confirm the details and attendance at the conference. The National Association of Secretaries of State had a conference on February 7-10, 2024, and the National Association of State Elections Directors had a conference on February 8-10, 2024. These organizations usually hold concurrent conferences, and both were held at the Grand Hyatt Hotel in Washington, D.C. The investigator confirmed that the General Registrar was not a registered attendee at either conference.

A timeline was developed from the City of Richmond's ID card system, the Residence Inn receipt, and a fuel purchase on the General Registrar's government P-Card. On February 7, 2024, the General Registrar swiped his ID card at the Office of Elections in Richmond at 2:00 pm. The General Registrar checked into the Residence Inn Hotel in Arlington on February 7, 2024, at 4:26 pm. The General Registrar checked out the Residence Inn Hotel on February 8, 2024, at 9:21 am. On February 8, 2024, at 9:48 am, records show that the General Registrar used their government P-Card to purchase fuel in Springfield, VA, 14.2 miles south on I-95 from the hotel and opposite the conference's location.

This travel had no determined business purpose; DPS Policy 15 Procurement Program, Travel Specific Purchases Section states, "The P-Card is a solution for authorized business travel-related expenses."

City of Richmond Administrative Regulation 6.4 Travel Policy Section IV. Procedures, E. Reimbursable Expenses, 2. Lodging, 2. States, "The Lodging guidelines for In-State and selected Out-of-State cities are provided in the Lodging Guideline Table at the end of the Travel Procedures. All travelers should inquire about and confirm government rates during reservation and check-in. If your destination cannot be located in the attached guidelines, the standard lodging rate per night shall apply to in-state and out-of-state travel. Lodging reimbursement is limited to expenses incurred up to the guideline amount, plus hotel taxes and surcharges. Expenses over the guidelines will not be reimbursed unless approved in advance by the traveler's Director. Even with the Director's approval, lodging costs must be reasonable and necessary. Travelers who do not plan with careful consideration to these guidelines will bear the additional expense personally." The Commonwealth of Virginia Department of Accounts lists the GSA per diem rates as the standard for state lodging travel rates. The General Registrar used City funds to pay for a hotel for personal reasons and did not have any legitimate business purpose for travel; therefore, this constitutes a waste of City funds.

**Allegation No. 19: Substantiated.**

20. Current and former employees abused their position and wasted City funds by consuming alcoholic beverages during working hours in violation of the City of Richmond Administrative Regulation 4053 Substance Abuse Policy.

Facts: Investigators reviewed meal expenses for the Office of Elections and found alcoholic beverages were purchased. Former and current employees admitted to drinking alcoholic beverages when they went out to lunch with the General Registrar. The General Registrar admitted that, along with their employees, they consumed alcoholic beverages while at lunch and returned to the office. All employees who admitted to consuming alcohol said that they paid for their alcoholic beverages.

The City of Richmond Administrative Regulation 4053 Substance Abuse Policy, Section II. The policy states, "The possession, consumption, or being under the influence of alcohol or illegal drugs, and the unauthorized use of drugs, is prohibited in the workplace. This prohibition includes all breaks and meals, regardless of whether the break/meal is taken in or outside the workplace." The consumption of alcoholic beverages during work hours constitutes a waste of City funds, as they were being paid during this time. This further constitutes an abuse of their authority.

**Allegation No. 20: Substantiated.**

21. The General Registrar abused their authority on or about July 5, 2023, by not reporting domestic violence between city employees in the workplace in violation of the City of Richmond Administrative Regulation 4.13, Violence in the Workplace.

Facts: In August of 2023, a group of employees attended the Voter Registrars Association of Virginia (VRAV) Conference in Roanoke, Virginia. Two employees who went to the conference were dating and shared a room. One employee was an agency temp worker and contracted with the Office of Elections for approximately one month. The temp worker was arrested for domestic assault on their partner, who was a city employee at that time. The employees returned on Wednesday, August 2, 2023. On Thursday, August 3, 2023, the assaulted employee stayed home and could not be reached. The Office of Elections sent the local Sheriff's Office for a welfare check at their residence. The Department of Human Resources was made aware of the incident. The Employee Relations manager reached out to the General Registrar and offered assistance. The General Registrar spoke with the assaulted employee and offered for them to stay at the General Registrar's house, saying that they would have to agree to no longer have a relationship with the offender. The assaulted employee refused the General Registrar's offer. The General Registrar then told the assaulted employee that the General Registrar would have to let them go because of the safety concerns for the other employees and asked for their resignation. The assaulted employee said they were told that if they resigned, the office could help them get unemployment benefits. The assaulted employee applied for unemployment benefits but was denied, citing their resignation. In their resignation e-mail sent to the General Registrar, the assaulted employee wrote that they were involuntarily resigning.

The request for the resignation was made without consultation with Human Resources or the City Attorney's Office. The Deputy General Registrar said they consulted with the Human Resources Business Partner assigned to the Office of Elections about asking for the assaulted employee's resignation. The investigator discussed the details with the Human Resources Business Partner and employee relations manager. The Human Resources Business Partner and the Human Resources Employee Relations Manager stated that the conversation with the Deputy General Registrar about this employee's resignation did not occur. On August 9, 2023, the Deputy General Registrar e-mailed the Human Resources Business Partner stating that the assaulted employee had cut off contact with the Office of Elections and canceled meetings and, therefore, was asked to resign. It was learned during the investigation that on or about July 5, 2023, two employees had notified the General Registrar that they overheard the offender inside the assaulted employee's office yelling. The General Registrar's reply to the employees was that they did not want to get involved in domestic matters. The General Registrar was interviewed and stated that they did receive these complaints and did not act on them.

The City of Richmond Administrative Regulation 4.13 Violence in the Workplace identifies workplace violence in its Purpose, stating, "The safety and security of all employees are of primary importance at the City of Richmond. The City has zero tolerance for any acts or threats of violence committed by or against an employee. It is the policy of the City to promote and maintain a work environment free from violence, threats of violence, verbal abuse, harassment, intimidation, and other disruptive behavior by establishing preventative measures, holding perpetrators of violence accountable, and providing assistance and support to victims. Workplace violence is defined as any action that may threaten the safety and security of an employee, impact the employee's physical and/or psychological well-being or cause damage to

City property, the use or possession of an unauthorized weapon or acts of violence, or abusive behavior against employees, visitors, customers, clients, or other individuals by anyone on City property will not be tolerated. Section III. Responsibility identifies the responsibilities of supervisors, which states in part, "Immediately notify Appointing Authority, Human Resources, and City Safety Office of any workplace violence incidents."

These reports of a violation of the workplace violence policy were not reported to Human Resources, nor were the requirements in the Violence in Workplace Policy followed. The General Registrar asked an employee to resign without consulting Human Resources or proper reasoning. This constitutes an abuse of authority.

**Allegation No. 21: Substantiated.**

22. The Deputy General Registrar abused their authority by not reporting complaints of harassment and sexual harassment to Human Resources in violation of City of Richmond Administrative Regulation 4.6, Anti-Harassment, and City of Richmond Administrative Regulation 4.13, Violence in the Workplace.

Facts: Two Office of Election employees complained about workplace violence and harassment to the Deputy General Registrar against an offensive employee. The first employee made a complaint alleging that the offensive employee used cursive and abusive language while yelling at them. The first employee submitted a written complaint alleging violence in the workplace to Human Resources through the Deputy General Registrar. The Deputy General Registrar informed the first employee that all complaints to Human Resources must come through the Deputy General Registrar because the Deputy General Registrar is the Liaison to Human Resources. The first employee's complaint was not forwarded to Human Resources by the Deputy General Registrar. The investigator requested a copy of the first employee's complaint and was told by the Deputy General Registrar that it was destroyed because the employee withdrew their complaint. When asked by the investigator, the first employee denied retracting the complaint.

The second employee complained, alleging a violation of the anti-harassment policy to the Deputy General Registrar. The second employee asserts that the offensive employee continued asking them out for a date after telling the other employee they were uninterested. The Deputy General Registrar did not forward the complaints to Human Resources. The Human Resource Business Partner assigned to the Office of Elections said the Deputy General Registrar is not a Human Resources Liaison; the Human Resources Business Partner is the Liaison between the Office of Elections and Human Resources. The Human Resources Business Partner stated they did not receive either of the complaints.

The City of Richmond Administrative Regulation 4.13 Violence in the Workplace identifies workplace violence in its Purpose, stating, "The safety and security of all employees are of primary importance at the City of Richmond. The City has zero tolerance for any acts or threats of violence committed by or against an employee. It is the policy of the City to promote and

maintain a work environment free from violence, threats of violence, verbal abuse, harassment, intimidation, and other disruptive behavior by establishing preventative measures, holding perpetrators of violence accountable, and providing assistance and support to victims. Workplace violence is defined as any action that may threaten the safety and security of an employee, impact the employee's physical and/or psychological well-being or cause damage to City property, the use or possession of an unauthorized weapon or acts of violence, or abusive behavior against employees, visitors, customers, clients, or other individuals by anyone on City property will not be tolerated. Section III. Responsibility identifies the responsibilities of supervisors, which states in part, "Immediately notify Appointing Authority, Human Resources, and City Safety Office of any workplace violence incidents."

City of Richmond Administrative Regulation 4.6 Anti-Harassment outlines behaviors that are not allowed in the workplace. In Section III., A. Unacceptable Behaviors, 5. Hostile Environment states, "Conduct, including the above-referenced behaviors, which creates an intimidating, hostile, or offensive work environment." Section IV., A. Responsibilities of Management, states, "Management who allow unlawful harassment to continue or who fail to take appropriate corrective action shall be considered a party to the act or behavior, although they may not behave in such a manner. Such management shall be subject to corrective action. Depending upon the circumstances, such corrective measures may result in demotion from a supervisory position or dismissal from City service."

The violation of the workplace violence policy and the anti-harassment policy were not reported to Human Resources, nor were the policy requirements followed on how to respond to an incident. This failure to report and respond to the allegations of harassment and sexual harassment constitute an abuse of authority.

Allegation No. 22: **Substantiated.**

23. The General Registrar abused their authority and wasted government resources on or about June 28, 2023, by paying their spouse with government funds for consultation services, violating the City of Richmond Administrative Regulation, 1.1 Code of Ethics.

Facts: On August 24, 2023, the Office of Elections issued a purchase order for consultation services for a training video from the spouse of the General Registrar. The invoice was dated June 28, 2023, for services from February 27, 2023, to June 12, 2023, for \$2,300 to develop a training video for election officers to deal with voters of different abilities. A former employee stated that this was the former employee's project and that the spouse of the General Registrar offered to help the former employee since the General Registrar's spouse works in this field. The former employee said they didn't know the spouse of the General Registrar was being paid as a consultant until they saw it in the newspaper.

The City of Richmond Administrative Regulation 1.1, Ethics in Section III., B. Responsibilities of employees states, "No employee or any member of his or her immediate household may acquire an interest in or operate any business or commercial enterprise which is in any way

related, directly or indirectly, to the employee's official duties, or which might otherwise be involved in an official action taken or recommended by the employee, or which is anyway related to matters over which the employee could wield any influence, official or otherwise." The General Registrar's spouse is an immediate family member and benefits financially from an official duty of the General Registrar. This constitutes a waste and abuse of City funds.

**Allegation No. 23: Substantiated.**

24. The Deputy General abuse their authority on or about October 25, 2021, by using the government P-Card to purchase retail items from a company owned by the General Registrar's spouse in violation of City of Richmond Administrative Regulation 1.1 Code of Ethics.

Facts: On October 25, 2021, and November 4, 2021, the Deputy General Registrar made two payments by government P-Card for \$252 and \$225 to the company of the General Registrar's spouse to purchase cloth facemasks.

The City of Richmond Administrative Regulation 1.1 Ethics in III., B. Responsibilities of employees states, "No employee or any member of his or her immediate household may acquire an interest in or operate any business or commercial enterprise which is in any way related, directly or indirectly, to the employee's official duties, or which might otherwise be involved in an official action taken or recommended by the employee, or which is anyway related to matters over which the employee could wield any influence, official or otherwise." The General Registrar's spouse is an immediate family member and benefited financially from a purchase by an employee supervised by the General Registrar. The purchase of these retail items constitutes an abuse of authority.

**Allegation No. 24: Substantiated.**

25. The Deputy General Registrar wasted government resources by operating a non-profit organization during work hours, violating City of Richmond Administrative Regulation 1.1 Code of Ethics and City of Richmond Administrative Regulation 2.5 Electronic Media Systems.

Facts: The Deputy General Registrar operates a not-for-profit animal rescue group. The Deputy General Registrar sells purses, perfumes, and jewelry to office employees during work hours as fundraisers for the charity. The Deputy General Registrar also solicits Office of Election employees for attendance at fundraising events for the animal rescue group. The Deputy General Registrar conducts activities on behalf of the charity while working for the Office of Elections during working hours. The Deputy General Registrar uses government resources, such as city e-mail and city computers, for charity activities during work hours.

The City of Richmond Administrative Regulation 1.1 Ethics in Section III., B. Responsibilities of employees states, "An employee shall not advertise, solicit or participate, while on City of Richmond government-owned or leased property or while on-duty, the commercial sale of goods, products or services not related to their job, in any gambling activity, including the

operation of a gambling device, in conducting a lottery or pool, in a game for money or property, or purchasing or selling a numbers slip or ticket, except those lawful activities sponsored by a VA State approved agency." The Deputy General Registrar admitted to selling goods on city property during work hours.

The City of Richmond Administrative Regulation 2.5 Electronic Media Systems restricts the use of City systems to official city business only, stating, "The electronic mail systems (e-mail), Internet, Intranet, hardware, software, tools, and information are provided to conduct business for the City of Richmond only." The Deputy General Registrar admitted to using city media systems for purposes other than official city purposes. This constitutes a waste of City funds.

**Allegation No. 25: Substantiated.**

26. The General Registrar committed fraud by failing to submit vacation time and sick leave in violation of City of Richmond Administrative Regulation 4.8, Leave Policy, and City of Richmond Administrative Regulation 5.13, Time and Attendance Policy.

Facts: E-mails indicated that the General Registrar had gone on a two-week vacation in August 2023. The General Registrar's leave balance records were reviewed from January 1, 2021, to July 3, 2024. City records show the General Registrar had not taken any vacation or sick leave since beginning employment. When asked about their leave balance, the General Registrar said they were unaware of how leave worked since they were salaried. The General Registrar and Deputy General Registrar are the only two salaried employees at the Office of Elections. The Deputy General Registrar's leave balances were reviewed from January 1, 2018, to July 3, 2024, with no leave used since the appointment of the current General Registrar. The Deputy General Registrar was interviewed and said they do not take much time off but have taken some and have always submitted their time on their timecard. The Deputy General Registrar's CORERP (City of Richmond Enterprise Resource Planning) – RAPIDS account was reviewed. The Deputy General Registrar was submitting timecards with leave, but they were never approved. After the former General Registrar left, the Deputy General Registrar's supervisor was not changed in RAPIDS and was still showing the former General Registrar as their supervisor. The General Registrar listed the times they took off since their appointment. Human Resources was notified to make the necessary leave adjustments to their leave accrual balances to account for the time taken.

City of Richmond Administrative Regulation 4.8 Leave Policy, Section II., Policy states, "All requests for leave should be submitted and approved in advance of any absence from work." City of Richmond Administrative Regulation 5.13, Time and Attendance Policy, Section II., Procedure states, "After the initial orientation and training, it is the employee's responsibility for recording time worked and time requested for various types of leave (vacation, sick, compensatory, jury duty, military leave, etc.)." The General Registrar intentionally failed to submit or record vacation and sick leave taken. The falsification of leave constitutes fraud.

**Allegation No. 26: Substantiated.**

**Conclusion:**

Based on the findings, the Office of the Inspector General concludes that 25 allegations were substantiated, and one was unsubstantiated.

Should you have any questions, please contact me at extension 1840.

Submitted,



James Osuna  
Inspector General

Cc Honorable Members of City Council  
City of Richmond Local Electoral Board