## I. EXECUTIVE SUMMARY

The Office of Public Integrity (OPI) observed the annual physical inventory of the Bureau of Water stockroom on September 29, 2007. The results of the inventory indicate that the variance rate for Water has decreased since the last inventory observed by OPI on June 17, 2006 but is higher than the variance rate at the April 24, 2004 physical inventory. The variance for Street Lighting has increased slightly from the previous inventory and remains significantly higher than the variance rate at the April 2004 physical inventory. This increase warrants management attention to ensure adequate control of the inventory. We noted the following findings during this review:

- ♦ OPI determined variances in 8.5% of our sample selection of water stockroom inventory items indicative of differences between the physical counts and the quantities recorded in the perpetual records. This is significantly lower than the variance rate noted in the previous inventory.
- OPI determined variances in 21% of street lighting stockroom inventory items indicative of differences between the physical counts and the quantities recorded in the perpetual records. This is slightly higher than the 20% error rate noted in the previous inventory.
- ♦ OPI noted 17 out of 1,336 water stockroom inventory items and 22 out of 340 street lighting inventory items in which stockroom personnel did not accurately update the perpetual inventory system with the quantities counted during the physical inventory count. This represents an error rate of 1.3% for water and 6.5% for street lighting. The effect of this condition is to negate the benefit of taking a physical inventory.
- ♦ OPI determined that Bureau personnel did not record some inventory items on the perpetual inventory system. These items have a combined value of \$40,795.40 and are stored at the Hemlock treatment facilities.

### II. BACKGROUND, OBJECTIVES AND SCOPE

## A. <u>Assignment</u>

The Office of Public Integrity routinely observes and participates in annual physical inventories of various City stockrooms to independently ensure the accuracy of the inventory counts. The Bureau of Water conducted its

annual physical inventory of the water and street lighting stockrooms on September 29, 2007. OPI participated in these counts at the request of the Department of Environmental Services.

## B. <u>Background</u>

The Materials and Equipment unit of the Director's Office stores and manages an inventory of supplies and materials necessary to operate and maintain the water distribution system. As of September 29, 2007, the inventory consisted of 1,336 line items valued at \$883,401.

The Street Lighting unit was transferred to the Bureau of Architecture and Engineering in 2007, however, the Materials and Equipment unit of the Bureau of Water continues to store and manage the street lighting inventory of supplies and materials. The Street Lighting unit oversees the City's street lighting system. As of September 29, 2007, the inventory consisted of 340 line items valued at \$412,170.

Bureau of Water stockroom personnel utilize an automated inventory system that assists in controlling quantities and providing various management information. A perpetual inventory record is an essential feature of this system. This Bureau moved to its new facility on Felix Street in December 2006.

## C. Objective And Scope

The objectives of this review are to assure an accurate and complete physical inventory count and to assess the effectiveness of inventory controls.

Management is responsible for establishing and maintaining a system of internal accounting and administrative control. Fulfilling this responsibility requires estimates and judgments by management to assess the expected benefits and related costs of control procedures. The objectives of a system are to provide management with reasonable, but not absolute, assurance that assets are safeguarded against loss from unauthorized use or disposition, and that transactions are executed in accordance with management's authorization and recorded properly to permit the preparation of accurate, informative reports that are fairly stated.

Because of inherent limitations in any system of internal accounting and administrative control, errors or irregularities may nevertheless occur and not be detected. Also, projection of any system evaluation to future periods

is subject to the risk that procedures may become inadequate because of changes in conditions or that the degree of compliance with procedures may deteriorate.

The recommendations presented in this report include the more significant areas of potential improvement that came to our attention during the course of the examination, but do not include all possible improvements that a more extensive review might develop.

### III. RESULTS OF REVIEW

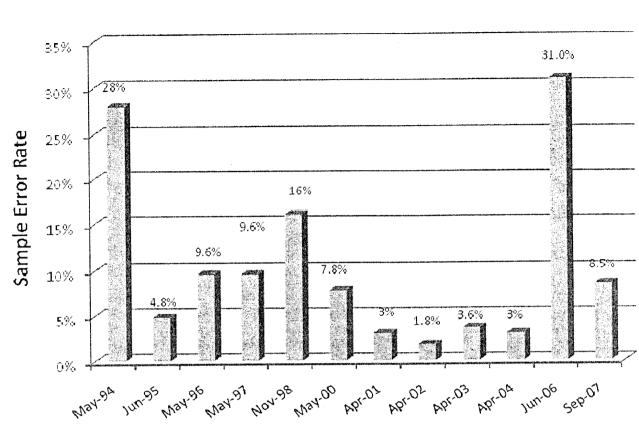
The results of this physical inventory indicate the variance rate for the water stockroom has significantly decreased since the last inventory date while the street lighting variance has increased slightly.

#### A. Variance Analysis - Water Stockroom

The Office of Public Integrity selected a statistical sample of items included in the stockroom inventory. The sample selection assures proper representation throughout the entire population of inventory items and allows us to accurately project the results against the entire inventory. The range of unit costs included in the sample extends from \$8,650.00 to \$0.07. OPI compared the actual count of each of these selected items to perpetual records and noted any variances.

Of the 165 inventory items tested in the sample, variances exist in 14 items. This represents a sample error rate of 8.5%. The following graph presents historical error rates as a reference.

## Bureau of Water Water Stockroom Inventory Sample Error Rate Percentages



**Inventory Date** 

Table I (attached) presents the variance analysis of the statistical sample selection for those items in which a variance exists. It demonstrates individual variances between actual physical counts and quantities recorded in the perpetual records, and presents positive and negative variances separately. Additionally, the table includes the net variance. To eliminate counting errors, Bureau personnel recounted all items in which a difference existed between the quantities recorded in the perpetual record and the actual quantities on hand during the physical inventory.

When OPI extends the sample error rate of 8.5% to the entire population of 1,336 different stock items, the projection indicates that the actual number of errors in the population is in the range of 59 and 216 stock items. The error rate of 8.5% is lower than the prior error rate of 31% in the June 2006 inventory, however it is higher than the 3% variance noted in the April 2004 inventory. The positive and negative variances currently existing may indicate ineffective posting procedures to the perpetual records of the automated inventory system, control weaknesses in computer processing, improper identification of items within inventory, or theft.

## Recommendation

Bureau management should determine the causes of the variances, take corrective action and continue to make inventory control a priority.

#### Variance Analysis - Street Lighting Stockroom Β.

error rates as a reference.

population of street lighting inventory items. The range of unit costs included in the inventory extends from \$2,715.00 to \$0.01. The Office of Public Integrity compared the actual count of each of these items to perpetual records and noted any variances. Of the 340 line items in the street lighting inventory, variances exist in 72 items. The true error rate is 21%. This variance rate is slightly higher than the variance rate of 20%

Due to the relatively small number of street lighting inventory line items, we examined 100% of the inventory rather than selecting a statistical sample. As a result, the error rate noted represents the true error rate in the entire

noted in June 2006 but significantly higher than the error rate of 4.9% that

we noted in the 2004 inventory. The following graph presents historical

## Bureau of Water Street Lighting Stockroom Inventory Inventory Variance Error Rate Percentages

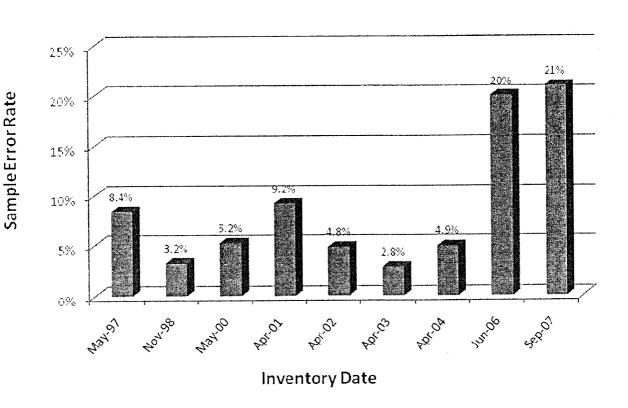


Table II (attached) presents the variance analysis for those items in which a variance exists. It demonstrates individual variances between actual physical counts and quantities recorded in the perpetual records, and presents positive and negative variances separately. Additionally, the table includes the net variance. To eliminate counting errors, Bureau of Water personnel recounted all items in which a difference existed between the quantities recorded in the perpetual record and the actual quantities on hand during the physical inventory.

When OPI compares the error rate of 21% to the prior error rate of 4.9% in April 2004, the variance rate has increased significantly. The positive and negative variances currently existing may indicate ineffective posting procedures to the perpetual records of the automated inventory system, control weaknesses in computer processing, improper identification of items

within inventory, or theft. Bureau of Water personnel should establish procedures enabling them to maintain adequate control over the stockroom inventory.

## ♦ <u>Recommendation</u>

Bureau management should determine the causes of the variances, implement corrective action, and continue to make inventory control a priority.

## C. <u>Inaccurate Updates To The Automated Inventory System</u>

Bureau of Water personnel record quantities counted on preprinted count sheets, and clerical staff update the perpetual records by transferring this information to the automated inventory system. As a result, the quantities recorded on the count sheets should agree to the post-inventory perpetual records generated by the automated inventory system.

The Office of Public Integrity noted 17 items out of 1,336 water stockroom

which the quantities recorded on the count sheets do not agree to the quantities recorded on the post-inventory perpetual records. This may have occurred because Bureau personnel did not clearly indicate on the count sheets the updates that clerical staff needed to make on the automated system. These discrepancies represent an error rate of 1% for Water and 6.5% for Street Lighting. Consequently, the perpetual inventory records do not always reflect accurate quantities counted at the physical inventory.

inventory line items and 22 of the 340 street lighting inventory line items in

The effect of this condition is to negate the benefit of taking a physical inventory and to perpetuate inaccurate records within the automated system, a key management tool.

## ♦ <u>Recommendation</u>

Bureau of Water personnel should accurately update <u>all</u> counted inventory items on the automated perpetual inventory system. Additionally, the Bureau should periodically conduct cycle counts. The Bureau should correct current errors on the perpetual inventory records so that the errors do not carry over into future periods.

## D. Items Not Recorded On Perpetual Inventory

In addition to the main inventory storage area on Felix Street, the Bureau of Water also stores some inventory at the Hemlock Lake treatment facilities. Accordingly, OPI also verified the inventory at that location.

We noted that the Bureau's perpetual inventory records did not include four inventory line items stored at the Hemlock facilities. The total value of these line items is \$40,795.40

The automated inventory system provides management with critical inventory information. A perpetual inventory record is an essential feature of this system and assists in controlling and managing quantities. When Bureau personnel do not record all inventory, the results are inaccurate records within the automated system, and management's inability to determine if the inventory stock items are properly controlled.

## ♦ <u>Recommendation</u>

Bureau inventory personnel should record all inventory items, upon receipt, on the perpetual inventory system.

## IV. DEPARTMENTAL RESPONSE

The response of the Department of Environmental Services follows.

		Water Stock Room Inventory - September 29, 2007 Statistical Sample Selection Schedule of Inventory Variances Only									
Stack	Part	Booked Quantity	Actual Ouantity	Item Cou	nt Variance	Unit	Dollar V	ariance			
Stock Number		On Hand	Counted	Over	Short	Cost	Over	Short			
574	Rod, Threaded, Std 3/8 x 12	51	49	0	2	\$ 2.25	\$ 0.00	\$ (4.50)			
657	Air Hose Stem, 3/4	15	14	0	1	2.64	0.00	(2.64)			
291	Bolt, Hex, 1/2 x 3 GA	4	5	1	0	20.50	20.50	0.00			
1257	Rod, Coupling, Breakable, Met Hyd	21	22	1	0	32.70	32.70	0.00			
1421	Seat Ring O RIng M-94 HYDT	87	83	0	4	0.39	0.00	(1.56)			
1219	Hammer, Mason's	4	6	2	0	20.03	40.06	0.00			
1576	Wheels, Air Cut Off Saw	37	58	21	0	1.19	24.99	0.00			
589	Belt, Drive, Pipe Saw	8	9	1	0	13.60	13.60	0.00			
-	, , ,										

65

112

39

16

121

600

0

28

71

116

37

19

124

596

Coupler Plug W 1/4 Fpt, Br Push-tite

First Aid, Antiseptic Swabs

Adapter, Tap, Lead Gooseneck

Nut, Oper, N-3, 8 Ludlow Val

Pellets. Ice Melt

NET VARIANCE . . . . . . . . .

Key, Curb Val, 4'

1310

1615

624

1212

627

438

6

0

\_ 3\_

24

0.47

3.40

9.80

28.51

5.85

5.75

(2.82)

(3.40)

0.00

(39.20)

(17.55)

(17.25)

(\$88.92)

\$99.95

0.00

0.00

0.00

57.02

0.00

0.00

\$188.87

TABLE I: Department of Environmental Services

Bureau of Water

**Part** 

Description

70W NONCYCLING HPS LAMP

100W NONCYCLING HPS LAMP

FIXTURE ACORN 100H USED

LUM 100W HPS RES BZ

BALLAST KIT 100W HPS

LUM REBUILT RES 70W/BK

FIXTURE USED RES 100W

SIDE RIB w/STUD RSL 350

REFRACTOR GASKET-TOP

STARTING AID RES PT LUM PS-55

WIRING HARNESS FOR RES. LUMS

HOUSING SHIELD-RES LUM 180 DEG.

WIRING HARNESS (male) FOR RES LUM

TOP COVER W/O GASKET&PC RECEP

BALLAST 70W HPS RES PT LUM

COBRAHEAD 100H S/S TYPE III

COBRAHEAD 150W S/S REBUILD

COBRAHEAD 150W L/S REBUILD

COBRAHEAD 150H L/S TYPE III

COBRAHEAD 250H L/S TYPE III

COBRAHEAD 400H L/S TYPE III

8' MAST ARM BLACK (GALV)

4' MAST ARM-GALV

8' MAST ARM GALV

12' MAST ARM - GALV

16' MAST ARM - GALV

SLR3 PLASTIC COVER

PLASTIC PULLBOX COVER

PLASTIC PULL BOX w/ COVER

ANCHOR BOLT SET 5/8" (4)

**FESTOON BOXES - GREEN** 

POLE 14' W/ HH, GFI/BRZ

POLE FRP w/o SHROUD

POLE 14' w/HH

GLASS REFRACTOR L/S #637 NEW

COBRAHEAD POWER DOOR 250W L/S - OLD STY

COBRAHEAD POWER DOOR 250H REBUILD

SMALL PULLBOX W/COVER-10"ROUND

NUT COVERS FOR METAL POLES/BLK

ANCHOR BOLTS 3/4"x21"x3" STD FRP

ANCHOR BOLTS 3/4"x30"x4" FRP

STANDARD BASE COVER (SHROUD)

HANDHOLE W/ CONCRETE CVR PEM1220PCX

COBRAHEAD 250W USED TYPE III

BALLAST 150W HPS PT LUM

BALLAST 100W HPS RES. PT LUM

TOP COVER W/ GASKET&PC RECEPTACLE

LUM REBUILT RES. 100W/BK

LUM 85W QL RES

SIDE RIB RSL 350

Stock

Number

OL007

**OLO10** 

1L110

1L285

1L320

1L451

1L507

1L510

1L530

1L824

1L838

1L855

1L868

1L877

1L878

1L880T

1L895

1L896

1L907

1L910

1L915

2L110

2L215

2L216

2L246

2L315

2L325

2L340

2L611

21626

2L652

3L004

3L008

3L012

3L016

4L005

4L009

4L010

4P200

5L001

5L002

5L002A

5L002B

5LOO4FB

5L014

5L014G

5L014H

4L120D

5D530NC

3L008BK

# Booked Quantity On Hand

552

237

2

1

1

53

19

8

16

89

50

38

10

67

55

29

89

88

82

58

15

3

1

1

52

63

57

16

0

2

0

105

14

50

9

75

28

30

21

40

1

163

62

171

9

3

93

8

4

192

TABLE II: Department of Environmental Services Bureau of Water

Actual

Quantity

Counted

444

238

3

0

0

59

17

3

6

88

69

51

106

40

30

41

66

91

85

16

0

0

0

50

64

36

21

6

0

2

107

15

52

8

51

26

14

20

41

173

52

2

0

6

0

178

144

2

214

6

Street Lighting Inventory - September 29, 2007 Schedule of Inventory Variances Only

Item Count Variance

Short

108

0

0

1

1

0

2

5

10

1

0

0

4

0

15

0

48

22

0

0

o

0

3

1

1

2

0

0

0

2

0

0

0

0

1

24

2

16

1

0

0

0

10

7

0

3

0

2

4

21

Over

0

1

1

0

0

6

0

0

0

0

19

13

0

39

0

1

0

0

9

27

1

22

0

0

0

0

1

0

5

6

0

2

2

1

2

0

0

0

0

0

1

1

10

0

0

7

0

0

0

51

Unit

Cost

\$ 12.05

12.05

493.00

650.00

200.00

128.80

333.83

335.70

275.00

12.40

21.50

74.10

50.20

8.20

7.20

18.60

150.00

82.70

48.40

52.40

122,70

125.50

50.00

55.00

71.50

138.00

143.00

146.00

27.60

114.75

40.00

42.00

80.55

137.80

120.80

108.00

12.10

19.30

37.40

105.75

8.30

0.00

20.00

10.00

27.00

27.00

0.00

400.00

453.00

230.00

Dollar Variance

Short

\$(1,301.40)

0.00

0.00

0.00

(650.00)

(200.00)

(667.66)

(1,678.50)

(2,750.00)

(12.40)

0.00

0.00

0.00

0.00

0.00

0.00

0.00

0.00

(150.00)

(55.00)

(71.50)

(276.00)

(3,066.00)

0.00

0.00

0.00

(80.00)

0.00

0.00

0.00

0.00

(108.00)

(290.40)

(598.40)

(105.75)

0.00

0.00

0.00

0.00

0.00

0.00

(906.00)

(920.00)

(100.00)

(189.00)

(38.60)

(200.80)

(108.00)

(7,200.00)

(1,819.40)

Over

\$

0.00

12.05

493.00

0.00

0.00

0.00

0.00

0.00

0.00

408.50

963.30

319.80

0.00

0.00

18.60

0.00

0.00

435.60

122.70

0.00

0.00

0.00

0.00

0.00

143.00

138.00

688.50

0.00

84.00

161.10

137.80

241.60

0.00

0.00

0.00

0.00

0.00

8.30

0.00

0.00

0.00

0.00

0.00

0.00

189.00

20,400.00

200.00

1,414.80

2,761.00

772.80

TABLE II: Department of Environmental Services														
Bureau of Water Street Lighting Inventory - September 29, 2007														
	Schedule of Inventory Variances Only													
i		32112MAIZ AT	III XIIXI	. WILLIAM	<del>V</del>			!						
		Booked	Actual											
Stock	Part	Quantity	Quantity	Item Count Variance		Unit	Dollar Variance							
Number	<u>Description</u>	On Hand	Counted	Oyer	<u>Short</u>	<u>Cost</u>	Over_	Short						
5LO15ZHF	POLE 12' w/HH, FB/BRZ	1	0	0	1	410.00	0.00	(410.00)						
5L020M	POLE 20' w/4' ARM, w/o ADAPTER, 10.5" bc	2	1	0	1	240.00	0.00	(240.00)						
5LO21	POLE 20' FRP w/ ARM12.5" bc (Atlantic)	1	0	0	1	500.00	0.00	(500.00)						
5L0214	POLE 20' FRP w/o ARM,5" TENON 10.5" bc	1	2	1	0	525.00	525.00	0.00						
5L022M	POLE 20' w/ ARM, ADAPTER, 5"TENON, 10.5"BC	3	1	0	2	628.00	0.00	(1,256.00)						
5L024F	POLE 25' w/ 4' ARM, FB, GFI	1	0	0	1	753.00	0.00	(753.00)						
5L025	POLE 25' w/BASE CVR,HH,ARM, 12.5"BC	1	0	0	1	653.00	0.00	(653.00)						
5LO3OBK	HANDHOLE CVR OVAL for FRP 2.5"x5"	10	12	2	0	20.00	40.00	0.00						
5L101	POLE 30' GALV SING. DAVIT-USED	7	1	0	6	175.00	0.00	(1,050.00)						
5L102	POLE 35' GALV SING. DAVIT-USED	10	24	14	0	200.00	2,800.00	0.00						
5L450A	POLE 12' S RIVER CORRIDOR	5	4	0	1	555.50	0.00	(555.50)						
7F1A3K	FIXT ANCESTRA 100H POST TOP- LAKE AVE	5	4	0	1	844.80	0.00	(844.80)						
8LA5	FLOWER POT HOLDER/ARM	1	0	0	1	30.00	0.00	(30.00)						
9A101	STERNER HARP FIXTURE	9	6	0	3	863.54	0.00	(2,590.92)						
9L352	ROD GALV 5/8"-11x6'	116	107	0	9	7.68	0.00	(69.12)						
9L425B	HARP-BROWNS RACE	7	2	0	5	0.01	0.00	(0.05)						
9L520	B&L 3-GLOBE FIXTURE (w/o GLOBE)	7	1	0	6	1,500.00	0.00	(9,000.00)						
9L522	B&L SMALL GLOBE (BOXED)	9	0	0	9	150.00	0.00	(1,350.00)						
9L523	B&L12' NON-FLUTED GREEN POLES	7	1	0	6	850.00	0.00	(5,100.00)						
9L524	B&L SHORT ROUND ANCHOR BOLT COVER	7	1	0	. 6	50.00	0.00	(300.00)						
9L525	B&L GLASS REFRACTORS	16	3	0	13	65.00	0.00	(845.00)						
9L553	STRAUB RELIEF GRIP-MESH ASSEMBLY	15	14	0	1	9.05	0.00	(9.05)						

<u>3,073</u>

<u>2,927</u>

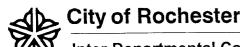
<u>245</u>

<u>391</u>

(\$49,099.25)

(\$15,620.80)

\$33,478.45



## Inter-Departmental Correspondence



To:

Dan Markese, Office of Public Integrity

From:

Paul Holahan, DES/Commissioner

Date:

December 15, 2007

Subject:

SEPTEMBER 2007 INVENTORY AUDIT RESPONSE

RECEIVED

DEC 17

CITY OF ROCHESTER

OFFICE OF PUBLIC INTEGRITY

The Water Bureau conducted its physical inventories of both the Water materials and Street Lighting materials stockrooms on September 29, 2007. The last physical inventory of these areas was performed June 17, 2006. The Office of Public Integrity (OPI) observed these inventories.

The results of the Water materials inventory indicated a marked decrease in the variation rate over the previous count from 31% to 8.5%. The results of the Street Lighting materials inventory indicated a 1% increase in the variance rate over the previous count from 20% to 21%.

The OPI indicated that these variances may be caused by ineffective posting, control weaknesses in computer processing, improper identification of items in the system, and theft.

As recommended by the OPI, our standard procedure immediately following the annual physical inventories is to assess the effectiveness of our operation, identify causes of variances and weaknesses in our procedures, and implement sound corrective actions to continually improve our operation.

Our assessment of the causes of the variances after this inventory identified the following:

- All materials at the West Avenue location were either packaged for transport to the new Felix Street facility or the Hemlock operations stockyard, sold by closed bid, sold as scrap, or disposed of as junk. Not all transactions were properly posted to the inventory database prior to the physical inventory.
  The volume of materials processed in the months prior to the move to Felix Street and the detailed preparation of those materials and records to ensure accountability and security presented a monumental task. Follow-through on some of the tasks did not happen in a timely manner. One example was the failure to transfer four line items from the Felix warehouse to the Hemlock stockyard. This was a one-time situation.
- Caccamise Electric, the Street Lighting service contractor for many years, unloaded many items from their warehouse to the West Avenue warehouse prior to our return to Felix Street. The materials were never in the City's database, and were left on-site with little or no information. Additionally, when Caccamise lost the contract this year, they delivered many more unmarked items from their warehouse to our Felix Street warehouse.

Efforts were concentrated after the physical inventory to resolve the problems. As of this date, all known problems have been resolved.

When the actual item count varies from the booked quantity, the "quantity-on-hand" field in the database is updated by the end of the physical inventory. 17 Water materials variances were not properly updated (1.3% variance); 22 Street Lighting variances were not properly updated (6.5% variance). All line item quantities will be compared to the actual count quantities in all future inventories. The final count number will be highlighted on the counters' sheets to positively identify the final count number.

unsealed packages were sometimes counted at the listed quantity on package

some items were counted individually instead of by the stated unit of measure;

some incomplete units were counted; when pieces of units are stripped from the main assembly, the entire assembly is issued out to that job. The remaining

All materials brought to Felix Street were organized by group, labeled, stocked in their newly-assigned locations, and cycle-counted by water bureau personnel. Street Lighting personnel assisted with the Street Lighting materials organization, counts, and computer record updates. However, not all items were cycle-counted prior to the physical inventory. Some items that were initially cycle-counted (and records adjusted) were subsequently changed, but the "on-hand" quantities were

We have begun an aggressive cycle-count program. We will count all water materials at

We will count the Street Lighting materials at least twice a year, and the high-volume

The ability of Street Lighting personnel to adjust quantities of materials in the database has been disabled. Only Water Materials personnel now have this capability. This ensures that the Water Materials staff is solely responsible for the integrity of this data.

least twice a year, and the high-volume items seven times a year.

Other smaller-scale problems that contributed to the variance rates:

pieces are no longer considered as inventoried units.

(opened packages must be individually counted);

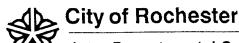
These items have been identified and are being addressed.

not adjusted accordingly.

items four times a year.

We are planning our next physical inventory for April 2008 to ensure our corrective actions are successful. Please contact me at your earliest convenience for further discussion or comments. Thank you.

xc: R. Morrisson
G. Giudice



## Inter-Departmental Correspondence





JUN 04 2008

CITY OF ROCHESTER

OFFICE OF PUBLIC INTEGRITY

To:

Daniel Markese, Office of Public Integrity

From:

Paul Holahan, Commissioner of Environmental Services

Date:

May 29, 2008

Subject:

Results from Inventory Audit – Water & Street Lighting Stockrooms

The Bureau of Water conducted its physical inventories of both the water materials and street lighting stockrooms on April 26, 2008. The last physical inventory of these stockrooms was performed on September 29, 2007.

I am pleased the results of the physical inventory indicate that the variance rates for the water and street lighting stockrooms both declined. The variance rate for the water stockroom decreased from 8.5% to 3.6%, with the variance for the street lighting stockroom decreasing from 21.0% to 5.7%.

The department will continue to make inventory control a top priority in the management of this bureau.

cc: Robert Morrison Gary Giudice