

**OFFICE OF THE INSPECTOR GENERAL**  
**CITY OF BALTIMORE**



**Isabel Mercedes Cumming**  
**Inspector General**

**Investigative**  
**Report Synopsis**

**OIG Case # 24-0026-I**

**Issued: December 10, 2024**



OFFICE OF THE INSPECTOR GENERAL  
Isabel Mercedes Cumming, Inspector General  
City Hall, Suite 635  
100 N. Holliday Street  
Baltimore, MD 21202



December 10, 2024

Dear Citizens of Baltimore City,

The mission of the Office of the Inspector General (OIG) is to promote accountability, efficiency, and integrity in City government, as well as to investigate complaints of fraud, financial waste, and abuse. The following synopsis is a condensed version of the full report provided to City management officials and does not contain all investigative information.

In December 2023, the OIG received a complaint alleging fraud involving a fuel card issued to a former Baltimore Police Department (BPD) officer. Specifically, the complaint cited that a fuel card issued to a former BPD officer was used to purchase fuel after the officer's separation in April 2022. Approximately 429 gallons of fuel were estimated to have been purchased fraudulently, totaling \$1,903.07.

### **Background**

The Department of General Services (DGS) is responsible for managing City fuel sites. In special circumstances, City employees can refuel vehicles at commercial sites using fuel cards; fuel cards act like credit cards and are assigned to eligible City employees. Requests for fuel cards are submitted by agency coordinators to a DGS Operations Officer (DGS Operations Officer). The DGS Operations Officer receives the requests, assigns fuel cards to employees, and oversees fuel consumption by City agencies.

The Baltimore Police Department (BPD) utilizes fuel cards to purchase fuel at commercial locations in special circumstances. The BPD Asset Coordinator (BPD Asset Coordinator) is responsible for requesting, managing, and discarding fuel cards, as well as managing the allocation and return of Departmental equipment and uniforms. When an officer separates from employment with BPD, the officer submits a completed BPD 221 Form (BPD form)<sup>1</sup> with their accompanying departmentally issued equipment and City form AM 241-2-2, Employee Clearance Checklist (City form).<sup>2</sup> Both forms are added to the officer's personnel file.

### **OIG Investigation**

#### ***Investigation of Former Employee's Card Usage***

OIG was provided with lists of employees assigned active fuel cards. The OIG compared the lists and found that the former officer was still documented as having a fuel card. The OIG also obtained the purchase history of the former officer's fuel card. The fuel card was used on 30 occasions to purchase fuel after the officer's separation, between April 2022 and August 2022, totaling \$1,903.07 for approximately 429 gallons of fuel. The OIG contacted the commercial fuel locations to obtain surveillance footage; however, none of the fuel locations had saved video from that time.

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<sup>1</sup> BPD Form 221 (BPD form) lists all departmental property that would be assigned to and returned by an officer. The form documents the employee, the departmental property, the date it was returned, the signature of who it was returned to, and why it was returned.

<sup>2</sup> City form AM 241-2-2 (City form), Employee Clearance Checklist documents the employee's information and lists general City property that may be assigned.

#### ***REPORT FRAUD, WASTE AND ABUSE***

HOTLINE: 443-984-3476/800-417-0430 EMAIL: [OIG@BALTIMORECITY.GOV](mailto:OIG@BALTIMORECITY.GOV) WEBSITE: [OIG.BALTIMORECITY.GOV](http://OIG.BALTIMORECITY.GOV)

**This public synopsis is only a summary of a more comprehensive report of investigation submitted to the appropriate City management official**

The OIG interviewed the former officer's supervisor (Supervisor) who reported the officer's assigned property was returned by a retired BPD Major (retired BPD Major). The retired BPD Major declined an official interview request but said that they returned a box of the officer's departmentally issued property to the officer's Supervisor but could not recall what property was in the box. The OIG reviewed the officer's separation paperwork, including the BPD form and the City form. Fuel cards are listed as returnable property on the City form but not on the BPD form. According to interviews conducted, the City form is not filled out in its entirety because the BPD form is considered the primary form to complete.

#### ***Other Active Cards***

The OIG's review of the lists provided by the BPD Asset Coordinator and the DGS Operations Officer revealed that 16 other former BPD employees who had separated from the City still had active fuel cards. The OIG reviewed the active cards assigned to the former employees who separated within the last two years and found no fuel was purchased following their separation dates.

#### ***Protocol for Cancellation***

The OIG interviewed the BPD Asset Coordinator, who reported cards should be canceled when employees separate from BPD or are no longer eligible for a card. The BPD Asset Coordinator learns of separations and ineligibility from departmentwide issued human resources orders, notice from command staff, or the respective employee. When the BPD Asset Coordinator becomes aware of such an instance, they contact the DGS Operations Officer to cancel the card.

The OIG obtained communications from the BPD Asset Coordinator requesting the DGS Operations Officer to cancel the card in May 2023, approximately a year after the officer separated from the department. The OIG obtained additional communications from the BPD Asset Coordinator to the DGS Operations Officer requesting the cancellation of 12 other former employees. Those 12 former employees were still listed as active fuel card holders.

#### **Findings and Current Status**

The OIG investigation supports the allegation that the former BPD employee's card was utilized following their separation for a total of \$1,903.07. However, due to the length of time that has transpired since the transactions took place, the OIG was limited in its ability to identify the individual responsible for the transactions.

The OIG recommended the BPD review all fuel cards assigned to its employees to determine and cancel any outstanding cards. The OIG also recommended the BPD update the property return form to include all departmentally issued property. BPD has since implemented additional internal policies and procedures to ensure fuel cards are managed according to updated policies. BPD has also reported a partnership with DGS to ensure additional accountability and cooperation in the department's fuel management.

Sincerely,



Isabel Mercedes Cumming  
Inspector General

CC: Hon. Brandon M. Scott, Mayor of Baltimore City  
Hon. Zeke Cohen, Baltimore City Council President  
Hon. Bill Henry, Baltimore City Comptroller  
Honorable Members of the Baltimore City Council

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**Baltimore Police Department  
and  
Department of General Services  
Response  
Case # 24-0026-I**



**Berke Attila**  
Director



**Brandon M. Scott**  
Mayor



**Richard J. Worley, Jr.**  
Police Commissioner

June 27, 2024

Ms. Isabel Mercedes Cumming  
Inspector General  
City of Baltimore  
100 N. Holliday Street, Suite 635  
Baltimore, Maryland

**Re: OIG Case 24-0026-I**

Dear Madam Inspector General:

This correspondence will serve as the official response to OIG Management Alert for case #24-0026-I regarding a complaint alleging fraud involving a WEX fuel card issued to a former employee. The Baltimore Police Department and the Department of General Services appreciates the thorough review by the Inspector General's Office of the above referenced complaint. We agree with your findings and your recommendations.

Accordingly, we will take the following steps to address this issue:

- BPD will conduct an inventory of all assigned WEX cards.
- BPD will compare its inventory with Workday to ensure that all members assigned cards are active employees and meet the prerequisites for having a WEX card.
- BPD will work with its HR unit to ensure Asset Management is made aware of any personnel changes, including (terminations, retirements, and transfers).
- BPD will compare its inventory of active WEX cards with the DGS Fuel unit active inventory.
- BPD will update its WEX card usage policy to reflect an annual inventory of active cards and reconcile any differences.
- BPD will update its equipment return forms to ensure that fuel cards and take-home vehicles are listed as items.
- DGS will update the SOP for the management of WEX Fuel Cards, including a specified turnaround time for agency card deactivation requests.
- DGS's Fuel Systems Supervisor will attend our standing BPD x Fleet Weekly Status meetings once a month and as needed to review the active WEX card inventory and make necessary changes.
- DGS will work with BPD and WEX to explore and implement an auto deactivation process for inactive cards.
- DGS will collaborate with BPD and WEX to explore and implement purchase limits on cards for both total monthly and individual transactions.

- DGS will generate a monthly report of all card purchases exceeding the vehicle tank capacity.
- DGS will coordinate with BPD to update DRIVER ID numbers annually.
- DGS will collaborate with BPD and WEX to explore the feasibility of setting up email alerts for card user spending behaviors such as incorrect fuel grade and off-hour purchases.
- DGS will collaborate with WEX to gain access to the “ClearView Snap” module and dashboard, enabling us to analyze data on highest spending drivers, irregular spending patterns, and spikes, thereby allowing us to identify anomalies and outliers.
- DGS will collaborate with WEX to gain access to the “Merchant Map” for BPD’s potential fuel savings opportunities. The WEX Merchant Map is a live map that displays the best and worst priced fueling locations near card users.

Should you have any additional questions or issues, please contact the Director of BPD’s Asset Management Section, Mr. Randolph Reynolds at (410) 913-8877. Thank you for bringing this issue to our attention so that we can take the remedial measures necessary to prevent future unauthorized purchases.

Sincerely,



Richard J. Worley, Jr.  
Commissioner  
Baltimore Police Department



Berke Attila  
Director  
Baltimore City Department of General Services

Cc: The Honorable Brandon M. Scott, Mayor, City of Baltimore  
Ebony M. Thompson, Esq., City Solicitor, City of Baltimore  
Faith P. Leach, Chief Administrative Officer  
Simone C. Johnson, Deputy City Administrator  
Matthew Neil, Deputy Inspector General, City of Baltimore  
Tianna Bond, Executive Assistant to the Inspector General, City of Baltimore  
Andrew R. Smullian, Esq., Deputy Chief of Staff, Baltimore Police Department  
Major Derek Loeffler, Office of the Police Commissioner, Baltimore Police Dept.