



NEBRASKA AUDITOR OF PUBLIC ACCOUNTS

Mike Foley
State Auditor

Mike.Foley@nebraska.gov

PO Box 98917

State Capitol, Suite 2303

Lincoln, Nebraska 68509

402-471-2111, FAX 402-471-3301

www.auditors.nebraska.gov

September 18, 2023

J. Duane Sugden, Acting Chairperson
Five Rivers RC&D, Inc.
140 N. 4th Street
P.O. Box 332
Tecumseh, NE 68450

Dear Mr. Sugden:

As you know, the Nebraska Auditor of Public Accounts (APA) has received concerns regarding alleged financial improprieties by Bobbie Meints, the former Executive Director of Five Rivers Resource Conservation & Development, Inc. (Five Rivers). As a result, the APA began limited preliminary planning work to determine if a full financial audit or attestation would be warranted. Pursuant thereto, the APA obtained financial records and other relevant documentation from Five Rivers. Based on the outcome of this preliminary planning work, including an analysis of the information obtained, the APA has determined that a separate financial audit or attestation is unnecessary at this time.

Nevertheless, during the course of the preliminary planning work, the APA noted certain issues that merit corrective action.

Background Information

Five Rivers Resource Conservation & Development, Inc. (Five Rivers) was made up of 10 political subdivisions in Nebraska: Nemaha Natural Resources District (NRD), Lower Big Blue NRD, Otoe County, Nemaha County, Richardson County, Johnson County, Pawnee County, Gage County, Jefferson County, and Saline County. Several of these political subdivisions list Five Rivers on the Report of Joint Public Agency and Interlocal Agreements that are filed annually with the APA.

The Nebraska Secretary of State's website (<https://sos.nebraska.gov/>) lists Five Rivers as a public benefit non-profit corporation established on January 11, 1993. As of July 5, 2023, however, Five Rivers is no longer an active non-profit corporation, having been administratively dissolved.

During the three decades that Five Rivers was operative, its Board of Directors (Board) was the governing body responsible for exercising financial accountability and operational control. Pursuant to Article II ("Duties and Responsibilities") of the most recent employment agreement between Five Rivers and Ms. Meints, however, her duties as Executive Director included "[m]anaging operations of the Employer[.]" In exercising those duties, Ms. Meints was apparently granted considerable latitude in the handling of Five Rivers' financial activities, as the Board does not appear to have consistently reviewed her expenditures of corporate funds.

According to its bylaws (as amended April 20, 2017), Five Rivers was created for the purpose of providing local leadership and establishing a framework for "developing and implementing a comprehensive plan of action for the accelerated development and orderly conservation" of all its resources, thereby "creating a better environment in which to live, improving the agricultural and business economy, creating a better environment for attracting industry; increasing recreational, cultural and educational opportunities; improving health facilities, and beautifying the countryside." The bylaws set out also the following objectives for Five Rivers under Article III ("Objectives"):

The overall objectives are to assist in initiating and carrying out long-range programs of resource, conservation and development for the purpose of achieving a dynamic rural community with a satisfactory level of income and a pleasing environment, to create a favorable investment climate attractive to private capital, and to provide community services which may not be met by other agencies or organizations.

Five Rivers maintained a bank account at Auburn State Bank, in Auburn, NE, during most of the period January 1, 2020, through November 30, 2022. The following table shows the bank activity of this account:

Bank Account	Beginning Balance as of 1/1/2020	Total Deposits/Other Credits	Total Checks/Other Debits	Ending Balance as of 11/30/2022
Auburn State Bank	\$ 21,459.76	\$ 310,768.12	\$ 332,227.88	\$ 0.00

Note: Five Rivers closed this bank account on November 18, 2022. The closing withdrawal of \$165.99 was deposited into a new account opened at American National Bank in Tecumseh, Nebraska, on the same day.

The table below lists the different revenue sources for Five Rivers between January 1, 2020, and November 30, 2022, which comprised the total deposits of \$310,768.12.

Funding Source	Amount
State Payments	\$ 232,207.43
Local Political Subdivision Payments	\$ 49,694.20
Return Items and Other Credit Memos	\$ 12,566.49
Other Deposits	\$ 16,300.00
Total	\$ 310,768.12

As shown clearly in the above table, Five Rivers received a significant portion (nearly 91%) of its funding from the State and local political subdivisions. The State payments were related to grants awarded to Five Rivers by multiple agencies, including the Nebraska Environmental Trust (NET), the Nebraska Department of Environment and Energy (NDEE), and the Nebraska Department of Agriculture (NDA). The total payments received from each of these agencies between January 1, 2020, and November 30, 2022, are listed below:

Agency	Amount
Nebraska Dept. of Agriculture	\$ 47,095.00
Nebraska Dept. Environment & Energy	\$ 2,717.16
Nebraska Environmental Trust	\$ 182,395.27
Total	\$ 232,207.43

These State grant payments alone comprised nearly 75% of all funds received by Five Rivers during the period examined.

As of November 16, 2022, the Board consisted of the following members:

- Duane Sugden, Nemaha NRD
- Bob Lorenz, Lower Big Blue NRD
- James Parsons, Otoe County
- VACANT – Nemaha County
- Rick Karas, Richardson County
- Jim Erickson, Johnson County
- Ron Seitz, Pawnee County
- Eddie Dorn, Gage County
- Jim Frager, Jefferson County
- Phil Hardenburger, Saline County
- Jennifer Sommers, Cass County
- Ashley Rippe, At Large
- Paul Rohrbaugh, At Large
- Shirley Vodicka, At Large

The following timeline details significant events involving Five Rivers, including correspondence with various agencies related thereto:

- On June 18, 2021, the Nebraska Secretary of State issued Five Rivers a certificate of dissolution/revocation, effectively revoking Five Rivers' certificate of authority to conduct business in Nebraska as a non-profit corporation.

- On April 27, 2022, Five Rivers received signed contracts from the Nebraska Environmental Trust (NET) for grants 22-148 (\$197,292 for SE Nebraska Household Hazardous Waste Collections), 22-200 (\$274,320 for Native Grassland Protection Against Invasive Species), and 22-209 (\$168,657 for SE Nebraska Electronics Collections). These grants were to be paid on a reimbursement basis, and the total grant amounts were to be split evenly over the course of three years.
- On June 8, 2022, Five Rivers submitted a reimbursement request to the NET grant portal for grant 22-148.
- On June 30, 2022, NET conducted a monitoring audit of Five Rivers at the Nemaha Natural Resources District office in Tecumseh, NE. Five Rivers' Executive Director, Bobbie Meints, Board Chairman, and Treasurer were all present during the audit, which was triggered by issues noted during NET's review of the June 8, 2022, reimbursement request for grant 22-148. Among those issues were the following: (1) Despite having been administratively dissolved by the Nebraska Secretary of State on June 18, 2021, Five Rivers continued thereafter to represent itself as an operating non-profit corporation with 501(c)3 status; (2) All three grant applications submitted by Five Rivers provided an outdated IRS Form 990 from 2017 as its current financial statements; and (3) NET noted discrepancies in the documentation submitted to support Five Rivers' reimbursement request. As a result of the audit, NET requested additional supporting documentation. All parties agreed that such documentation would be provided by July 7, 2022.
- On July 6, 2022, Ms. Meints requested to extend the supporting documentation deadline to July 12, 2022, due to illness. By July 12, 2022, however, NET had received no additional documentation or correspondence from Five Rivers.
- On July 13, 2022, Five Rivers was given a 15-day notice that NET was revoking and cancelling grant numbers 22-148, 22-200, and 22-209.
- On July 25, 2022, Five Rivers' status as a public benefit non-profit corporation was reinstated by the Nebraska Secretary of State.
- On July 26, 2022, the NDA awarded Five Rivers a Riparian Vegetation Management Grant in the amount of \$89,001.50.
- On August 12, 2022, NET notified Five Rivers that an amended grant contract would be considered if proper documentation could be submitted.
- On August 25, 2022, Five Rivers received its last State grant payment of \$18,011.84 in relation to the NDA's Riparian Vegetation Management Grant.
- On October 27, 2022, Ms. Meints sent an email to the Executive Director of NET, including meeting minutes and an employment contract for grant administration, to move forward with an amended contract proposal. In response to this email, the NET Executive Director issued a letter stating that the new documentation appeared inaccurate and, due to continual misrepresentations contained in the Five Rivers grant applications, the notice of revocation and cancellation of the grants remained valid and in effect. Nevertheless, the NET Executive Director stated in the letter that he, in good faith, would recommend the NET Board consider an amended contract proposal with certain funding limitations.
- On November 3, 2022, the NET Board held its fourth quarter meeting and approved the amended contracts for grants 22-148, 22-220, and 22-209 initially approved on April 27, 2022. These amended contracts would not allow general administration expenses for Five Rivers' Executive Director and personnel.

However, Five Rivers received no reimbursement payments from any of the three NET grants subsequent to the approval of the amended contracts.

- On November 16, 2022, the Board of Five Rivers accepted Ms. Meints's resignation.
- On July 5, 2023, the Nebraska Secretary of State administratively dissolved Five Rivers once more.

The following comments and recommendations, which have been discussed with the appropriate members of Five Rivers and its management, are intended to improve internal control or result in other operating efficiencies of the political subdivisions responsible for creating Five Rivers.

Comments and Recommendations

1. Alleged Fraud

Bobbie Meints is believed to have served as the Executive Director of Five Rivers from at least October 2012 until her resignation in November 2022, as Five Rivers officials were unsure exactly when she started working in that position. Nevertheless, during her tenure as Executive Director, Ms. Meints had oversight and control over Five Rivers' financial activities. The APA received allegations that Ms. Meints had been making unauthorized personal payments with Five Rivers funds. Responding thereto, the APA obtained Five Rivers' bank account statements, as well as other supporting documentation, including credit card statements, for the period December 2015 through November 2022.

While examining Five Rivers' credit card and bank statements, the APA observed several disbursements to Arley's, LLC (Arley's), a mobile food vendor based out of Steinauer, NE, and owned by Ms. Meints' husband, Arlan Meints. According to the Nebraska Secretary of State's website, Arley's is a domestic limited liability company created on November 13, 2014, with Mr. Meints designated as its registered agent and an office address of 71721 614th Avenue, Steinauer, NE 68441. Pawnee County's Geographic Information Systems (GIS) website (<https://pawnee.gworks.com/>) lists the owners of that property as "MEINTS/BOBBIE L & ARLAN K."

The APA also observed posts on Ms. Meints' Facebook account, both while she was employed as the Executive Director of Five Rivers and after her resignation, promoting Arley's. The following images are examples of such posts on March 11, 2023, and August 24, 2022, respectively.



As shown in the table below, the Five Rivers payments to Arley's totaled \$219,963.52 for the period December 2015 through November 2022, while Ms. Meints was serving as Executive Director.

Description	Number of Transactions	Total Amount of Possible Fraud
Credit Card Payments to Arley's	162	\$ 185,458.33
ACH Electronic Fund Transfers and Check Payments to Arley's	38	\$ 34,505.19
Total		\$ 219,963.52

The above Arley's payments are ostensibly personal in nature, as they appear to have been neither for services provided to Five Rivers nor approved by the Board. Furthermore, such payments have no apparent connection to the aforementioned objectives of Five Rivers to "assist in initiating and carrying out long-range programs of resource, conservation and development for the purpose of achieving a dynamic rural community."

Credit Card Payments to Arley's

Initially, the suspect payments to Arley's were made with a Five Rivers credit card. Between November 22, 2017, and July 13, 2020, the Five Rivers' credit card was used to make 162 payments, totaling \$185,458.33, to Arley's. Throughout the period examined, Five Rivers never had more than one business credit card in circulation and, as Executive Director, Ms. Meints was allowed exclusive control over it. As an example, the following is an excerpt of the credit card statement for March 2020.

PLEASE DETACH HERE AND RETURN TOP PORTION WITH YOUR PAYMENT

Business Edition® Visa® **Account Number:**
[REDACTED]
Page 001 of 002

Account Summary

Previous Balance \$13,292.96
 Payments -\$7,232.80
 Other Credits -\$0.00
 Purchases +\$6,768.55
 Balance Transfers +\$0.00
 Cash Advances +\$0.00
 Fees Charged +\$39.00
 Interest Charged +\$194.70
New Balance \$13,062.81

Statement Closing Date 03/26/20
 Days in Billing Cycle 30

Total Credit Limit \$15,000.00
 Available Credit \$1,937.00
 Cash Limit \$3,000.00
 Available Cash \$1,937.00

Payment Information

New Balance \$13,062.81
 Minimum Payment Due \$381.00
 Past Due Amount \$0.00
Payment Due Date April 22, 2020

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Transaction Detail

Trans Date	Post Date	Reference Number	Transaction Description	Credits (CR) and Debits
2-25	2-26	2489218005610008582341	SQ *ARLEY7S, LLCSteinauer NE	\$1,575.00
2-25	2-26	24892180056100092119755	SQ *ARLEY7S, LLCSteinauer NE	\$339.00
2-26	2-26	74418220057000057081000	OVERLIMIT FEE	\$39.00
3-12	3-12	74418000072075000017805	EXPEDITED PAYMENT US	\$1,988.42 (CR)
3-13	3-16	24892180078100858318182	SQ *ARLEY7S, LLCSteinauer NE	\$1,600.00
3-16	3-16	74418000078075000045874	EXPEDITED PAYMENT US	\$1,999.88 (CR)
3-17	3-18	24892180077100341894949	SQ *ARLEY7S, LLCSteinauer NE	\$1,999.55
3-18	3-18	74418000078075000013967	EXPEDITED PAYMENT US	\$1,255.76 (CR)
3-19	3-20	24892180079100373028280	SQ *ARLEY7S, LLCSteinauer NE	\$1,255.00
3-25	3-25	74418000085075000012811	EXPEDITED PAYMENT US	\$1,988.55 (CR)

In this month alone, Arley's was paid a total of \$6,768.55. It should be noted also that the credit card statement balances were paid using funds from the Five Rivers' business checking account at Auburn State Bank and are listed as the "EXPEDITED PAYMENT" transaction description items in the above image.

Exhibit A herein contains a table compiled by the APA detailing each of the 162 payments made to Arley's with the Five Rivers credit card from November 22, 2017, through July 13, 2020.

ACH Electronic Fund Transfers and Check Payments to Arley's

No further Five Rivers credit card payments to Arley's were observed subsequent to July 13, 2020. Beginning in September 2020, however, payments continued to be made directly to Arley's through Five Rivers' bank account.

Between September 22, 2020, and November 2, 2022, 38 Five Rivers payments, totaling \$34,505.19, were made to Arley's by either Automated Clearing House (ACH) electronic fund transfers or physical checks.

The following table details the Five Rivers ACH electronic fund transfers and check payments to Arley's:

Date	Payment Type	Amount	Payee/Description
9/22/2020	Check #3765	\$ 567.50	Arley's, LLC
12/31/2020	ACH	\$ 1,342.45	SALE TO ARLEYS, LLC
1/26/2021	ACH	\$ 1,500.00	SALE TO ARLEYS, LLC
2/2/2021	ACH	\$ 525.00	SALE TO ARLEYS, LLC
2/23/2021	ACH	\$ 925.25	SALE TO ARLEYS, LLC
4/5/2021	ACH	\$ 305.17	SALE TO ARLEYS, LLC
5/10/2021	ACH	\$ 350.00	SALE TO ARLEYS, LLC
6/4/2021	ACH	\$ 577.85	SALE TO ARLEYS, LLC
6/15/2021	ACH	\$ 412.95	SALE TO ARLEYS, LLC
7/27/2021	ACH	\$ 1,648.77	SALE TO ARLEYS, LLC
8/3/2021	ACH	\$ 1,260.00	SALE TO ARLEYS, LLC
8/9/2021	ACH	\$ 1,162.77	SALE TO ARLEYS, LLC
8/10/2021	ACH	\$ 879.89	SALE TO ARLEYS, LLC
8/19/2021	Check #3962	\$ 466.75	Arley's, LLC
8/19/2021	ACH	\$ 1,275.00	SALE TO ARLEYS, LLC
8/23/2021	ACH	\$ 1,648.77	SALE TO ARLEYS, LLC
8/25/2021	ACH	\$ 1,125.75	SALE TO ARLEYS, LLC
8/31/2021	ACH	\$ 845.75	SALE TO ARLEYS, LLC
9/3/2021	ACH	\$ 614.98	SALE TO ARLEYS, LLC
9/7/2021	ACH	\$ 1,314.27	SALE TO ARLEYS, LLC
9/13/2021	ACH	\$ 1,208.77	SALE TO ARLEYS, LLC
9/22/2021	ACH	\$ 1,239.63	SALE TO ARLEYS, LLC
10/1/2021	ACH	\$ 1,835.70	SALE TO ARLEYS, LLC
10/6/2021	ACH	\$ 659.38	SALE TO ARLEYS, LLC
10/13/2021	ACH	\$ 1,424.25	SALE TO ARLEYS, LLC
10/14/2021	ACH	\$ 422.00	SALE TO ARLEYS, LLC
10/18/2021	ACH	\$ 762.29	SALE TO ARLEYS, LLC
10/26/2021	ACH	\$ 422.00	SALE TO ARLEYS, LLC
11/23/2021	ACH	\$ 997.77	SALE TO ARLEYS, LLC
12/24/2021	ACH	\$ 897.27	SALE TO ARLEYS, LLC
5/11/2022	ACH	\$ 1,675.21	SALE TO ARLEYS, LLC
6/3/2022	ACH	\$ 860.62	SALE TO ARLEYS, LLC
6/13/2022	ACH	\$ 303.26	SALE TO ARLEYS, LLC
7/15/2022	ACH	\$ 553.88	SALE TO ARLEYS, LLC
8/19/2022	ACH	\$ 723.47	SALE TO ARLEYS, LLC
9/2/2022	ACH	\$ 785.98	SALE TO ARLEYS, LLC
10/19/2022	ACH	\$ 481.04	SALE TO ARLEYS, LLC
11/2/2022	ACH	\$ 503.80	SALE TO ARLEYS, LLC
Total		\$ 34,505.19	

Images of the two Five Rivers checks issued to Arley's on September 22, 2020, and August 19, 2021, are shown below:

Check 1 (Top):
 Five Rivers Resource Conservation & Development
 P.O. BOX 625
 TECUMSEH, NE 68450
 PAY TO THE ORDER OF: Arley's, LLC
 Amount: \$567.50
 Date: 06/22/2020
 Signature: Janet M. McCartney
 MICR line: ⑈003785⑈ ⑈104900912⑈

Check 2 (Bottom):
 Five Rivers Resource Conservation & Development
 P.O. BOX 332
 TECUMSEH, NE 68450
 PAY TO THE ORDER OF: Arley's, LLC
 Amount: \$466.75
 Date: 8-19-21
 Signature: Janet M. McCartney
 MICR line: ⑈003962⑈ ⑈104900912⑈

As mentioned previously, Ms. Meints had oversight and control of Five Rivers' financial activities, including the ability to request ACH electronic fund transfers from Five Rivers' bank account. Likewise, despite bearing the signature of Janet M. McCartney, the then-Treasurer of the Board, both of the checks shown above were subject to the purview of Ms. Meints.

Five Rivers was unable to provide adequate documentation to support whether Arley's provided any catering services for the aforementioned payments. Additionally, what nominal documentation was provided failed to correspond with any of the payments reflected on the credit card statements.

The table below shows two examples of the many inconsistencies found between the documentation provided and the credit card statements:

Per Supporting Documentation				Per Credit Card Statements				
Invoice Date	Service Date	Vendor	Amount	Transaction Date	Post Date	Vendor	Transaction Description	Amount
5/8/2019	5/8/2019	Arley's	\$ 125.00	5/8/2019	5/9/2019	Arley's	SQ *ARLEYS STEINAUER NE	\$ 698.00
8/14/2019	8/14/2019	Arley's	\$ 125.00	8/14/2019	8/15/2019	Arley's	SQ *ARLEYS STEINAUER NE	\$ 1,800.00
Totals			\$ 250.00					\$ 2,498.00

More concerning yet, Five Rivers representatives informed the APA that they did not recall receiving any catering services from Arley's.

The information presented above points to the apparent unauthorized expenditure of Five Rivers funds by Ms. Meints for her own and/or her husband's personal benefit, giving rise to serious statutory concerns.

To start, Neb. Rev. Stat. § 28-511 (Reissue 2016) provides, in relevant part, the following:

- (1) A person is guilty of theft if he or she takes, or exercises control over, movable property of another with the intent to deprive him or her thereof.*
- (2) A person is guilty of theft if he or she transfers immovable property of another or any interest therein with the intent to benefit himself or herself or another not entitled thereto.*

In addition, Neb. Rev. Stat. § 28-512 (Reissue 2016) states the following, as is relevant:

A person commits theft if he obtains property of another by deception. A person deceives if he intentionally:

- (1) Creates or reinforces a false impression, including false impressions as to law, value, intention, or other state of mind; but deception as to a person's intention to perform a promise shall not be inferred from the fact alone that he did not subsequently perform the promise; or*
- (2) Prevents another from acquiring information which would affect his judgment of a transaction; or*
- (3) Fails to correct a false impression which the deceiver previously created or reinforced, or which the deceiver knows to be influencing another to whom he stands in a fiduciary or confidential relationship; or*
- (4) Uses a credit card, charge plate, or any other instrument which purports to evidence an undertaking to pay for property or services delivered or rendered to or upon the order of a designated person or bearer (a) where such instrument has been stolen, forged, revoked, or canceled, or where for any other reason its use by the actor is unauthorized, or (b) where the actor does not have the intention and ability to meet all obligations to the issuer arising out of his use of the instrument.*

These potential statutory concerns aside, it should be noted that good internal controls and sound accounting practices require procedures to ensure that one person is not in a position both to perpetrate and to conceal financial errors or irregularities, including fraud.

Without such procedures, there is an increased risk for fraud or the misappropriation of funds.

We recommend the political subdivisions responsible for creating Five Rivers seek legal guidance regarding how to recoup, if possible, the apparently misspent funds addressed in this comment. Additionally, because this comment gives rise to concerns regarding possible violations of State statute, we are forwarding the information herein to the Nebraska Attorney General and the Johnson County Attorney for further review.

2. Payroll and Reimbursement Issues

During her tenure as the Executive Director of Five Rivers, Ms. Meints was responsible for overseeing the payroll process, including those payments made to herself. The APA noted from Five Rivers' bank account statements that Ms. Meints was paid a total of \$86,161.17 in 63 payments during the period January 1, 2020, through October 31, 2022.

The following table provides a summary of the actual net pay that Ms. Meints received:

Year	Number of Payments	Actual Net Pay Total
2020	20	\$ 24,191.55
2021	27	\$ 34,063.75
2022	16	\$ 27,905.87
Totals	63	\$ 86,161.17

A listing of all Five Rivers payroll disbursements to Ms. Meints during the period examined has been included as **Exhibit B** herein.

The APA observed that the payments to Ms. Meints do not appear to have been paid on a consistent basis or at a constant rate. For example, in the month of September 2022, Ms. Meints received six separate payroll payments, consisting of a mix between direct deposits and checks, totaling \$7,150.50, as shown in the table below:

Check #	Check Date	Payee	Memo	Amount
	9/7/2022	DIRECT PAY NATPAY -11960439 /11960439 FIVE RIVERS RES		\$ 1,191.75
	9/7/2022	DIRECT PAY NATPAY -11960439 /11960439 FIVE RIVERS RES		\$ 1,191.75
	9/7/2022	DIRECT PAY NATPAY -11960439 /11960439 FIVE RIVERS RES		\$ 1,191.75
	9/21/2022	DIRECT PAY NATPAY -11960439 /11960439 FIVE RIVERS RES		\$ 1,191.75
3985	9/22/2022	Bobbie Meints	Personnel/Payroll	\$ 1,191.75
3983	9/30/2022	Bobbie Meints	Payroll	\$ 1,191.75
Total				\$ 7,150.50

Ms. Meints also received another eight separate payroll checks that all cleared the bank during December 2021. Five Rivers' disbursement activity during that month totaled \$23,638.22. The eight payroll checks paid to Ms. Meints comprised \$7,354.15, or 31%, of that disbursement amount. Images of these eight checks have been included as **Attachment A** herein.

Furthermore, Five Rivers representatives were unable to provide adequate documentation to support these payments to Ms. Meints. As a result, the APA could not determine whether the remuneration that Ms. Meints received was in accordance with her approved wages.

In addition to these payroll amounts, Ms. Meints received reimbursement checks for mileage and other expenses supposedly incurred on behalf of Five Rivers. The APA noted that Ms. Meints was paid 32 such reimbursement checks, totaling \$28,699.45 from August 2020 through October 2022, as summarized in the following table:

Check #	Check Date	Payee	Memo	Amount
3898	8/3/2020	Bobbie Meints		\$ 1,745.50
3899	8/20/2020	Bobbie Meints		\$ 248.59
3900	8/24/2020	Bobbie Meints		\$ 1,645.42
3749	9/17/2020	Bobbie Meints		\$ 220.00
3768	9/22/2020	Bobbie Meints		\$ 377.77
3769	9/29/2020	Bobbie Meints	Reimb for T-shirts/koozies – WMA expense	\$ 1,202.44
3770	10/6/2020	Bobbie Meints	Reimb Supplies/Promo items	\$ 1,742.03
1234	12/17/2020	Bobbie Meints	Mileage	\$ 363.72
Note		Bobbie Meints	Reimb Computer & Printer	\$ 1,067.86
3903	1/5/2020*	Bobbie Meints	Reimb Shirts, Promo Items	\$ 1,202.44
3904	2/9/2021	Bobbie Meints	NETF Reimb	\$ 1,380.00
3905	2/18/2021	Bobbie Meints		\$ 233.15
3940	2/23/2021	Bobbie Meints		\$ 1,000.75
3941	3/8/2021	Bobbie Meints		\$ 775.88
3942	4/15/2021	Bobbie Meints		\$ 256.21
Cashier's Check	5/21/2021	Bobbie Meints	Cashier's Check – Bobbie Meints	\$ 2,400.00
3923	6/8/2021	Bobbie Meints		\$ 1,300.00
3946	7/8/2021	Bobbie Meints		\$ 1,300.00
3959	8/16/2021	Bobbie Meints	Mileage	\$ 477.96
3966	9/8/2021	Bobbie Meints	Mileage	\$ 886.45
3967	10/7/2021	Bobbie Meints	Reimbursement	\$ 1,942.33
3969	10/29/2021	Bobbie Meints	Mileage Inv. Weed / Com. meetings	\$ 228.56
3951	11/30/2021	Bobbie Meints	Reimbursement Electronics Collections	\$ 950.00
3970	12/3/2021	Bobbie Meints	Reimb. Elect. Collections	\$ 950.00
3971	12/8/2021	Bobbie Meints		\$ 850.00
3976	12/10/2021	Bobbie Meints	Mileage	\$ 247.00
3978	12/16/2021	Bobbie Meints		\$ 796.42
3964	2/17/2022	Bobbie Meints		\$ 445.77
3921	5/19/2022	Bobbie Meints	WMA Mileage/Meetings	\$ 515.22
3911	7/20/2022	Bobbie Meints		\$ 1,213.73
3997	10/24/2022	Bobbie Meints	Reimb. PO Box fees & Supplies	\$ 185.00
4001	10/28/2022	Bobbie Meints	Weeds of NE Books – WMA	\$ 549.25
Total				\$ 28,699.45

Note: This check had no check number and said only "12 -" on the "Date" line, indicating that it was issued in December but providing no information regarding the day or year.

* - This check is dated "1-5-20." However, it appears the actual date of the check should have been in 2021 based on the check number.

Five Rivers was unable to provide adequate documentation to support any of these reimbursement checks received by Ms. Meints. See **Attachment B** herein for images of three cleared Five Rivers reimbursement checks to Ms. Meints. Upon request, the APA can provide authorized personnel with images of other Five Rivers payroll and reimbursements checks made to Ms. Meints.

Again, despite containing signatures other than her own, the payroll and reimbursement checks at issue were subject to the purview of Ms. Meints.

Depending upon the circumstances surrounding Ms. Meints' potentially excessive payroll and other reimbursement disbursements to herself, the same statutory concerns cited in **Comment and Recommendation 1** ("Alleged Fraud") herein could become an issue.

Good internal control requires procedures to ensure that all payroll, reimbursement, and other expenses are not only subject to independent review and approval but also supported by adequate documentation.

Without such procedures, there is an increased risk for fraud or abuse.

We recommend the political subdivisions responsible for creating Five Rivers review the payroll and reimbursement payments that Ms. Meints made to herself and seek legal guidance regarding how to recoup, if possible, any such payments believed to have been improper. Additionally, because this comment gives rise to concerns regarding possible violations of State statute, we are forwarding the information herein to the Nebraska Attorney General and the Johnson County Attorney for further review.

3. Other Issues

In addition to the apparently fraudulent disbursements made by Ms. Meints with Five Rivers funds, the APA noted other issues regarding Five Rivers' bank accounts, credit card accounts, and payroll tax withholding remittances. These issues are explained in further detail below.

Negative Bank Balance

In examining Five Rivers' bank statements, the APA observed that the business checking account held at Auburn State Bank was overdrawn multiple times in May 2020; April, May, November, and December 2021; and May, August, and October 2022.

The following table summarizes all deposit and withdrawal activity in the Five Rivers bank account at Auburn State Bank from January 2020 through November 2022:

Month	Deposits/Other Credits	Checks/Other Debits	Balance
Beginning Balance			\$ 21,459.76
January 2020	\$ 5,072.25	\$ 10,115.82	\$ 16,416.19
February 2020	\$ -	\$ 9,761.57	\$ 6,654.62
March 2020	\$ 8,052.24	\$ 10,324.47	\$ 4,382.39
April 2020	\$ -	\$ 4,279.44	\$ 102.95
May 2020	\$ 4,295.03	\$ 3,713.11	\$ 684.87
June 2020	\$ 4,391.83	\$ 4,920.58	\$ 156.12
July 2020	\$ 2,835.20	\$ 2,248.41	\$ 742.91
August 2020	\$ 6,831.62	\$ 5,309.35	\$ 2,265.18
September 2020	\$ 49,765.11	\$ 37,546.45	\$ 14,483.84
October 2020	\$ 1,449.60	\$ 6,546.64	\$ 9,386.80
November 2020	\$ -	\$ 4,682.99	\$ 4,703.81
December 2020	\$ 23,888.54	\$ 22,799.38	\$ 5,792.97
January 2021	\$ 20,941.76	\$ 7,463.39	\$ 19,271.34
February 2021	\$ -	\$ 16,968.61	\$ 2,302.73
March 2021	\$ 250.00	\$ 2,143.73	\$ 409.00
April 2021	\$ 5,808.01	\$ 5,643.98	\$ 573.03
May 2021	\$ 9,434.61	\$ 9,694.96	\$ 312.68

Month	Deposits/Other Credits	Checks/Other Debits	Balance
June 2021	\$ 5,890.20	\$ 3,569.64	\$ 2,633.24
July 2021	\$ 50,418.23	\$ 12,343.16	\$ 40,708.31
August 2021	\$ 19,175.24	\$ 53,408.29	\$ 6,475.26
September 2021	\$ 4,000.00	\$ 8,540.84	\$ 1,934.42
October 2021	\$ 7,939.40	\$ 9,860.50	\$ 13.32
November 2021	\$ 2,777.80	\$ 2,897.77	\$ (106.65)
December 2021	\$ 24,218.54	\$ 23,638.22	\$ 473.67
January 2022	\$ 4,860.02	\$ 4,205.83	\$ 1,127.86
February 2022	\$ -	\$ 756.21	\$ 371.65
March 2022	\$ -	\$ 300.00	\$ 71.65
April 2022	\$ -	\$ -	\$ 71.65
May 2022	\$ 5,464.43	\$ 4,231.83	\$ 1,304.25
June 2022	\$ -	\$ 1,163.88	\$ 140.37
July 2022	\$ 6,250.00	\$ 4,231.11	\$ 2,159.26
August 2022	\$ 25,860.78	\$ 18,267.44	\$ 9,752.60
September 2022	\$ 840.20	\$ 10,360.97	\$ 231.83
October 2022	\$ 10,057.48	\$ 9,607.52	\$ 681.79
November 2022	\$ -	\$ 681.79	\$ -
Total Bank Activity	\$ 310,768.12	\$ 332,227.88	

In total, this account was overdrawn for 11 days and incurred \$235 in overdraft fees, as shown in the table below:

Range of Amount Overdrawn	# of Days Overdrawn	Overdraft Fees
\$ 96.65 - \$ 1,226.97	11	\$ 235.00

Payment of Credit Card Fees and Interest

During our review of Five Rivers' credit card statements for the period January 2020 through November 2022, the APA noted that Five Rivers paid a total of \$6,055.07 in various costs, including late fees, an overlimit fee, and interest penalties, to the credit card company.

The following table details these charges:

Date	Vendor	Charge	Amount
1/24/2020	First National Bank of Omaha	Interest	\$ 199.06
2/25/2020	First National Bank of Omaha	Interest	\$ 207.37
2/26/2020	First National Bank of Omaha	Overlimit Fee	\$ 39.00
3/26/2020	First National Bank of Omaha	Interest	\$ 194.70
4/24/2020	First National Bank of Omaha	Interest	\$ 190.29
5/26/2020	First National Bank of Omaha	Interest	\$ 208.25
6/25/2020	First National Bank of Omaha	Interest	\$ 193.57
7/24/2020	First National Bank of Omaha	Interest	\$ 187.80
8/25/2020	First National Bank of Omaha	Interest	\$ 194.68
9/24/2020	First National Bank of Omaha	Interest	\$ 179.70
10/26/2020	First National Bank of Omaha	Late Fee	\$ 39.00
10/26/2020	First National Bank of Omaha	Interest	\$ 182.25
11/25/2020	First National Bank of Omaha	Interest	\$ 164.84
12/24/2020	First National Bank of Omaha	Interest	\$ 154.12
1/25/2021	First National Bank of Omaha	Late Fee	\$ 39.00
1/25/2021	First National Bank of Omaha	Interest	\$ 171.92
2/24/2021	First National Bank of Omaha	Interest	\$ 155.82
3/24/2021	First National Bank of Omaha	Late Fee	\$ 39.00
3/24/2021	First National Bank of Omaha	Interest	\$ 147.34
4/26/2021	First National Bank of Omaha	Interest	\$ 173.70
5/25/2021	First National Bank of Omaha	Late Fee	\$ 39.00
5/25/2021	First National Bank of Omaha	Interest	\$ 149.60

Date	Vendor	Charge	Amount
6/23/2021	First National Bank of Omaha	Interest	\$ 144.85
7/23/2021	First National Bank of Omaha	Late Fee	\$ 39.00
7/23/2021	First National Bank of Omaha	Interest	\$ 151.55
8/24/2021	First National Bank of Omaha	Interest	\$ 157.68
9/24/2021	First National Bank of Omaha	Late Fee	\$ 39.00
9/24/2021	First National Bank of Omaha	Interest	\$ 153.72
10/26/2021	First National Bank of Omaha	Interest	\$ 156.58
11/24/2021	First National Bank of Omaha	Late Fee	\$ 39.00
11/24/2021	First National Bank of Omaha	Interest	\$ 140.87
12/23/2021	First National Bank of Omaha	Interest	\$ 140.92
1/25/2022	First National Bank of Omaha	Late Fee	\$ 39.00
1/25/2022	First National Bank of Omaha	Interest	\$ 157.01
2/24/2022	First National Bank of Omaha	Interest	\$ 138.40
3/28/2022	First National Bank of Omaha	Late Fee	\$ 39.00
3/28/2022	First National Bank of Omaha	Interest	\$ 149.24
4/26/2022	First National Bank of Omaha	Late Fee	\$ 39.00
4/26/2022	First National Bank of Omaha	Interest	\$ 137.54
5/25/2022	First National Bank of Omaha	Late Fee	\$ 39.00
5/25/2022	First National Bank of Omaha	Interest	\$ 139.76
6/23/2022	First National Bank of Omaha	Late Fee	\$ 39.00
6/23/2022	First National Bank of Omaha	Interest	\$ 142.03
7/26/2022	First National Bank of Omaha	Late Fee	\$ 39.00
7/26/2022	First National Bank of Omaha	Interest	\$ 164.44
8/25/2022	First National Bank of Omaha	Late Fee	\$ 39.00
8/25/2022	First National Bank of Omaha	Interest	\$ 152.08
9/23/2022	First National Bank of Omaha	Late Fee	\$ 39.00
9/23/2022	First National Bank of Omaha	Interest	\$ 149.39
Total			\$ 6,055.07

The APA also noted additional late fees, overlimit fees, payment dishonored fees, and interest penalties, totaling at least \$2,661.80, that were incurred prior to January 2020.

Payroll Tax Withholdings Remittances

The Internal Revenue Service (IRS) requires quarterly deposits for Federal income taxes, social security taxes, and Medicare taxes to be withheld from employees' wages, as well as for the employer's share of social security and Medicare taxes.

The APA noted that, during the period January 2022 through November 2022, Five Rivers made only one payment, totaling \$534.50, to the IRS for payroll tax withholdings. Five Rivers appears to have failed, therefore, to make the additional required deposits for the rest of the year. The failure to make such required remittances timely can result in interest and penalty fees being assessed by the IRS.

Furthermore, good internal controls require procedures to ensure the following: (1) sufficient funds are available in Five Rivers' bank accounts to pay expenses; (2) credit card billings are paid timely to avoid unnecessary late fees, overlimit fees, payment dishonored fees, and interest penalties; and (3) required payroll tax withholdings are remitted timely to prevent possible interest and penalty fees being assessed by the IRS.

Without such procedures, there is an increased risk for not only the accumulation of overdraft and credit card fees, resulting in the attendant loss of funds, but also the potential violation of Federal law.

We recommend the political subdivisions responsible for creating Five Rivers ensure that no other entity created or governed by any of them is permitted to place funds at risk through poor banking practices, late payments on credit card billings, or failure to comply with Federal tax laws.

* * * * *

Our audit procedures are designed primarily on a test basis and, therefore, may not bring to light all weaknesses in policies or procedures that may exist. Our objective is, however, to use the knowledge gained during our work to make comments and suggestions that we hope will be useful to the political subdivisions responsible for creating Five Rivers.

Draft copies of this letter were furnished to Five Rivers to provide its management with an opportunity to review and to respond to the comments and recommendations contained herein. Five Rivers declined to respond.

This communication is intended solely for the information and use of Five Rivers and its management. It is not intended to be, and should not be, used by anyone other than these specified parties. However, this communication is a matter of public record, and its distribution is not limited.

If you have any questions regarding the above information, please contact our office.

Audit Staff Working on this Examination:

Craig Kubicek, CPA, CFE – Deputy Auditor
Mason Culver – Auditor-In-Charge
Destini Morales – Auditor
Noah Deans – Auditor
Kelsey Lutz – Examiner

Sincerely,



Craig Kubicek, CPA, CFE
Deputy Auditor
Auditor of Public Accounts
Room 2303, State Capitol
Lincoln, NE 68509
Phone (402) 471-3686
craig.kubicek@nebraska.gov

FIVE RIVERS RESOURCE CONSERVATION & DEVELOPMENT, INC.

Attachment A

December 2021 Cleared Checks Paid to Bobbie Meints

CHECKING ACCOUNT DEPOSIT - Auburn State Bank 700

DATE 12-10-21

FROM Five Rivers

TO L.B.B.M.

AMOUNT \$ 1,000.00

10111-11110

1,000.00

FIVE RIVERS RESOURCE CONSERVATION & DEVELOPMENT

12-10-21

PAID TO THE ORDER OF Bobbie Meints

ONE thousand one hundred eighty six 9/100

\$ 1,186.91

3975 1,186.91

FIVE RIVERS RESOURCE CONSERVATION & DEVELOPMENT

11-30-21

PAID TO THE ORDER OF Bobbie Meints

Nine hundred fifty 00/100

\$ 950.00

3951 950.00

FIVE RIVERS RESOURCE CONSERVATION & DEVELOPMENT

12-10-21

PAID TO THE ORDER OF Bobbie Meints

Two hundred forty seven 00/100

\$ 247.00

3976 247.00

FIVE RIVERS RESOURCE CONSERVATION & DEVELOPMENT

12-3-21

PAID TO THE ORDER OF Bobbie Meints

Five hundred fifty 00/100

\$ 950.00

3970 950.00

FIVE RIVERS RESOURCE CONSERVATION & DEVELOPMENT

12-10-21

PAID TO THE ORDER OF NE-1A Helicopters LLC

Twelve thousand Six hundred fifty four 75/100

\$ 12,651.45

3977 12,651.45

FIVE RIVERS RESOURCE CONSERVATION & DEVELOPMENT

12-9-21

PAID TO THE ORDER OF Bobbie Meints

Eight hundred fifty 00/100

\$ 850.00

3971 850.00

FIVE RIVERS RESOURCE CONSERVATION & DEVELOPMENT

12-10-21

PAID TO THE ORDER OF Andrew Meyer

Seven hundred ninety six and 42/100

\$ 796.42

3978 796.42

FIVE RIVERS RESOURCE CONSERVATION & DEVELOPMENT

12-10-21

PAID TO THE ORDER OF Bobbie Meints

One thousand one hundred eighty six 9/100

\$ 1,186.91

3973 1,186.91

FIVE RIVERS RESOURCE CONSERVATION & DEVELOPMENT

12-10-21

PAID TO THE ORDER OF Bobbie Meints

One thousand one hundred eighty six 9/100

\$ 1,186.91

3974 1,186.91

FIVE RIVERS RESOURCE CONSERVATION & DEVELOPMENT, INC.
Check Image Examples of Reimbursements to Bobbie Meints

Attachment B

EXAMPLE 1

CASH ONLY IF ALL CHECK 100 SECURITY FEATURES LISTED ON BACK INDICATE NO TAMPERING ON COPY 1000

Five Rivers FIVE RIVERS RESOURCE, INC. 1092
CONSERVATION & DEVELOPMENT
P.O. BOX 526
TECUMSEH, NE 68450

AUBURN STATE BANK
AUBURN, NE 68305
78-011342

3898

08/03/2020

PAY TO THE ORDER OF Bobbie Meints \$ 1,745.50

One thousand seven hundred forty-five and 50/100 DOLLARS

MEMO Bobbie Meints
71721 614th Ave
Steinauer, NE 68441

10038898 104900912

3898 1,745.50

EXAMPLE 2

NAME: FIVE REIVERS RESOURCE

ACCT NO: DATE 12-

PAY TO THE ORDER OF Bobbie Meints \$ 1,067.86

One thousand Sixty Seven dollars & 86/100 DOLLARS

AUBURN STATE BANK
P.O. BOX 338, AUBURN, NE 68305
WWW.AUBURNSTATEBANK.COM
276-4342

FOR Reimb. Computer Printer

104900938

1,067.86

EXAMPLE 3

Five Rivers FIVE RIVERS RESOURCE, INC. 1092
CONSERVATION & DEVELOPMENT
P.O. BOX 526
TECUMSEH, NE 68450

Auburn State Bank
1218 J St
Auburn, NE 68305
78-011342

3967

10-7-21

PAY TO THE ORDER OF Bobbie Meints \$ 1,942.33

One thousand nine hundred forty two & 33/100 DOLLARS

MEMO Reimbursement

1003967 104900912

3967 1,942.33

FIVE RIVERS RESOURCE CONSERVATION & DEVELOPMENT, INC.

Exhibit A

Credit Card Charges to Arley's, LLC

November 2017 to July 2020

Transaction Date	Post Date	Vendor	Transaction Description	Amount
11/22/2017	11/24/2017	Arley's	SQ *ARLEY'S Steineuer NE	\$ 722.50
11/28/2017	11/29/2017	Arley's	SQ *ARLEY'S Steineuer NE	\$ 1,244.75
12/5/2017	12/6/2017	Arley's	SQ *ARLEY'S Steineuer NE	\$ 1,224.95
12/12/2017	12/13/2017	Arley's	SQ *ARLEY'S Steineuer NE	\$ 1,676.75
12/16/2017	12/18/2017	Arley's	SQ *ARLEY'S Steineuer NE	\$ 100.00
12/27/2017	12/28/2017	Arley's	SQ *ARLEY'S Steineuer NE	\$ 1,644.85
1/2/2018	1/3/2018	Arley's	SQ *ARLEY'S 877-417-4551 NE	\$ 100.00
1/5/2018	1/8/2018	Arley's	SQ *ARLEY'S Steineuer NE	\$ 455.55
2/14/2018	2/15/2018	Arley's	SQ *ARLEY'S Steineuer NE	\$ 1,645.50
2/20/2018	2/21/2018	Arley's	SQ *ARLEY'S Steineuer NE	\$ 240.00
3/14/2018	3/15/2018	Arley's	SQ *ARLEY'S Steineuer NE	\$ 1,000.00
3/20/2018	3/21/2018	Arley's	SQ *ARLEY'S Steineuer NE	\$ 900.00
3/27/2018	3/28/2018	Arley's	SQ *ARLEY'S Steineuer NE	\$ 900.00
5/29/2018	5/30/2018	Arley's	SQ *ARLEY'S STEINAUER NE	\$ 800.00
6/1/2018	6/4/2018	Arley's	SQ *ARLEY'S Steineuer NE	\$ 989.75
6/5/2018	6/6/2018	Arley's	SQ *ARLEY'S STEINAUER NE	\$ 920.00
6/12/2018	6/13/2018	Arley's	SQ *ARLEY'S Steineuer NE	\$ 877.77
6/18/2018	6/19/2018	Arley's	SQ *ARLEY'S Steineuer NE	\$ 1,342.75
6/19/2018	6/20/2018	Arley's	SQ *ARLEY'S STEINAUER NE	\$ 414.75
6/25/2018	6/26/2018	Arley's	SQ *ARLEY'S Peru NE	\$ 1,259.75
6/26/2018	6/27/2018	Arley's	SQ *ARLEY'S STEINAUER NE	\$ 685.75
7/3/2018	7/5/2018	Arley's	SQ *ARLEYS STEINAUER NE	\$ 1,899.95
7/19/2018	7/20/2018	Arley's	SQ *ARLEYS PARK CITY UT	\$ 1,100.00
7/31/2018	8/1/2018	Arley's	SQ *ARLEYS STEINAUER NE	\$ 1,575.75
8/1/2018	8/2/2018	Arley's	SQ *ARLEYS LINCOLN NE	\$ 350.00
8/7/2018	8/8/2018	Arley's	SQ *ARLEYS STEINAUER NE	\$ 700.00
8/8/2018	8/9/2018	Arley's	SQ *ARLEYS STEINAUER NE	\$ 1,200.00
8/17/2018	8/20/2018	Arley's	SQ *ARLEYS NEBRASKA CITY NE	\$ 1,885.77
8/22/2018	8/23/2018	Arley's	SQ *ARLEYS STEINAUER NE	\$ 1,875.88
8/23/2018	8/24/2018	Arley's	SQ *ARLEYS ELK CREEK NE	\$ 100.00
8/28/2018	8/29/2018	Arley's	SQ *ARLEYS STEINAUER NE	\$ 1,977.75
9/1/2018	9/4/2018	Arley's	SQ *ARLEYS STEINAUER NE	\$ 1,677.75
9/7/2018	9/10/2018	Arley's	SQ *ARLEYS STEINAUER NE	\$ 577.75
9/7/2018	9/10/2018	Arley's	SQ *ARLEYS STEINAUER NE	\$ 742.88
9/10/2018	9/11/2018	Arley's	SQ *ARLEYS STEINAUER NE	\$ 555.99
9/12/2018	9/13/2018	Arley's	SQ *ARLEYS STEINAUER NE	\$ 100.00
9/15/2018	9/17/2018	Arley's	SQ *ARLEYS TECUMSEH NE	\$ 1,277.99
9/17/2018	9/18/2018	Arley's	SQ *ARLEYS STEINAUER NE	\$ 600.00
9/20/2018	9/21/2018	Arley's	SQ *ARLEYS STEINAUER NE	\$ 599.99
9/21/2018	9/24/2018	Arley's	SQ *ARLEYS STEINAUER NE	\$ 125.00
9/25/2018	9/26/2018	Arley's	SQ *ARLEYS STEINAUER NE	\$ 950.00
9/28/2018	10/1/2018	Arley's	SQ *ARLEYS STEINAUER NE	\$ 800.00
10/2/2018	10/3/2018	Arley's	SQ *ARLEYS STEINAUER NE	\$ 1,000.00
10/4/2018	10/5/2018	Arley's	SQ *ARLEYS STEINAUER NE	\$ 900.00
10/10/2018	10/11/2018	Arley's	SQ *ARLEYS TECUMSEH NE	\$ 977.88
10/16/2018	10/17/2018	Arley's	SQ *ARLEYS PAWNEE CITY NE	\$ 1,877.88
10/26/2018	10/29/2018	Arley's	SQ *ARLEYS STEINAUER NE	\$ 1,000.00
10/30/2018	10/31/2018	Arley's	SQ *ARLEYS STEINAUER NE	\$ 900.00
11/2/2018	11/5/2018	Arley's	SQ *ARLEYS STEINAUER NE	\$ 1,899.99
11/7/2018	11/8/2018	Arley's	SQ *ARLEYS STEINAUER NE	\$ 1,942.27
11/10/2018	11/13/2018	Arley's	SQ *ARLEYS VIRGINIA NE	\$ 1,877.99
11/15/2018	11/16/2018	Arley's	SQ *ARLEYS STEINAUER NE	\$ 1,947.45
11/20/2018	11/21/2018	Arley's	SQ *ARLEYS STEINAUER NE	\$ 1,999.89
11/24/2018	11/26/2018	Arley's	SQ *ARLEYS STEINAUER NE	\$ 1,999.99
11/28/2018	11/29/2018	Arley's	SQ *ARLEYS PAWNEE CITY NE	\$ 1,875.75

FIVE RIVERS RESOURCE CONSERVATION & DEVELOPMENT, INC.

Exhibit A

Credit Card Charges to Arley's, LLC

November 2017 to July 2020

Transaction Date	Post Date	Vendor	Transaction Description	Amount
12/4/2018	12/5/2018	Arley's	SQ *ARLEYS STEINAUER NE	\$ 1,885.99
12/6/2018	12/7/2018	Arley's	SQ *ARLEYS STEINAUER NE	\$ 70.00
12/11/2018	12/12/2018	Arley's	SQ *ARLEYS STEINAUER NE	\$ 1,987.99
12/18/2018	12/19/2018	Arley's	SQ *ARLEYS STEINAUER NE	\$ 1,455.55
12/21/2018	12/24/2018	Arley's	SQ *ARLEYS STEINAUER NE	\$ 1,987.95
12/27/2018	12/28/2017	Arley's	SQ *ARLEYS STEINAUER NE	\$ 1,985.75
1/1/2019	1/2/2019	Arley's	SQ *ARLEYS STEINAUER NE	\$ 1,875.99
1/4/2019	1/7/2019	Arley's	SQ *ARLEYS ORANGE BEACH AL	\$ 1,244.75
1/6/2019	1/7/2019	Arley's	SQ *ARLEYS ORANGE BEACH AL	\$ 700.00
1/11/2019	1/14/2019	Arley's	SQ *ARLEYS STEINAUER NE	\$ 1,200.00
1/14/2019	1/15/2019	Arley's	SQ *ARLEYS STEINAUER NE	\$ 800.00
1/17/2019	1/18/2019	Arley's	SQ *ARLEYS PAWNEE CITY NE	\$ 1,200.00
1/26/2019	1/28/2019	Arley's	SQ *ARLEYS STEINAUER NE	\$ 1,200.00
1/29/2019	1/30/2019	Arley's	SQ *ARLEYS STEINAUER NE	\$ 800.00
1/30/2019	1/31/2019	Arley's	SQ *ARLEYS STEINAUER NE	\$ 1,200.00
2/1/2019	2/4/2019	Arley's	SQ *ARLEYS TECUMSEH NE	\$ 755.55
2/5/2019	2/6/2019	Arley's	SQ *ARLEYS STEINAUER NE	\$ 1,200.00
2/11/2019	2/12/2019	Arley's	SQ *ARLEYS STEINAUER NE	\$ 2,275.00
2/12/2019	2/13/2019	Arley's	SQ *ARLEYS STEINAUER NE	\$ 1,275.44
2/14/2019	2/15/2019	Arley's	SQ *ARLEYS FALLS CITY NE	\$ 777.77
2/14/2019	2/15/2019	Arley's	SQ *ARLEYS STEINAUER NE	\$ 1,355.89
2/18/2019	2/19/2019	Arley's	SQ *ARLEYS STEINAUER NE	\$ 577.42
2/19/2019	2/20/2019	Arley's	SQ *ARLEYS STEINAUER NE	\$ 877.67
2/19/2019	2/20/2019	Arley's	SQ *ARLEYS SPRINGFIELD NE	\$ 1,825.75
3/18/2019	3/19/2019	Arley's	SQ *ARLEYS STEINAUER NE	\$ 1,400.00
3/25/2019	3/26/2019	Arley's	SQ *ARLEYS STEINAUER NE	\$ 750.00
3/26/2019	3/27/2019	Arley's	SQ *ARLEYS STEINAUER NE	\$ 1,000.00
3/27/2019	3/28/2019	Arley's	SQ *ARLEYS STEINAUER NE	\$ 70.50
4/2/2019	4/3/2019	Arley's	SQ *ARLEYS STEINAUER NE	\$ 1,000.00
4/4/2019	4/5/2019	Arley's	SQ *ARLEYS STEINAUER NE	\$ 1,075.00
4/9/2019	4/10/2019	Arley's	SQ *ARLEYS STEINAUER NE	\$ 1,175.00
4/13/2019	4/15/2019	Arley's	SQ *ARLEYS STEINAUER NE	\$ 400.00
4/26/2019	4/29/2019	Arley's	SQ *ARLEYS STEINAUER NE	\$ 900.00
5/1/2019	5/2/2019	Arley's	SQ *ARLEYS STEINAUER NE	\$ 2,000.00
5/8/2019	5/9/2019	Arley's	SQ *ARLEYS STEINAUER NE	\$ 698.00
5/15/2019	5/16/2019	Arley's	SQ *ARLEYS STEINAUER NE	\$ 900.00
5/20/2019	5/21/2019	Arley's	SQ *ARLEYS STEINAUER NE	\$ 200.00
5/23/2019	5/24/2019	Arley's	SQ *ARLEYS STEINAUER NE	\$ 2,200.00
5/26/2019	5/28/2019	Arley's	SQ *ARLEYS PERU NE	\$ 800.00
5/30/2019	5/31/2019	Arley's	SQ *ARLEYS STEINAUER NE	\$ 850.00
5/31/2019	6/3/2019	Arley's	SQ *ARLEYS STEINAUER NE	\$ 170.00
5/31/2019	6/3/2019	Arley's	SQ *ARLEYS STEINAUER NE	\$ 1,025.25
6/4/2019	6/5/2019	Arley's	SQ *ARLEYS STEINAUER NE	\$ 1,005.00
6/5/2019	6/6/2019	Arley's	SQ *ARLEYS STEINAUER NE	\$ 1,000.00
6/11/2019	6/12/2019	Arley's	SQ *ARLEYS STEINAUER NE	\$ 1,500.00
6/18/2019	6/19/2019	Arley's	SQ *ARLEYS STEINAUER NE	\$ 1,500.00
8/13/2019	8/14/2019	Arley's	SQ *ARLEYS STEINAUER NE	\$ 4,577.88
8/14/2019	8/15/2019	Arley's	SQ *ARLEYS STEINAUER NE	\$ 1,800.00
8/18/2019	8/19/2019	Arley's	SQ *ARLEYS STEINAUER NE	\$ 700.00
8/20/2019	8/21/2019	Arley's	SQ *ARLEYS STEINAUER NE	\$ 1,300.00
8/21/2019	8/22/2019	Arley's	SQ *ARLEYS STEINAUER NE	\$ 600.00
8/22/2019	8/23/2019	Arley's	SQ *ARLEYS STEINAUER NE	\$ 700.00
8/23/2019	8/26/2019	Arley's	SQ *ARLEYS VIRGINIA NE	\$ 180.00
8/26/2019	8/27/2019	Arley's	SQ *ARLEYS STEINAUER NE	\$ 1,100.00
8/27/2019	8/28/2019	Arley's	SQ *ARLEYS STEINAUER NE	\$ 700.00

FIVE RIVERS RESOURCE CONSERVATION & DEVELOPMENT, INC.

Exhibit A

Credit Card Charges to Arley's, LLC

November 2017 to July 2020

Transaction Date	Post Date	Vendor	Transaction Description	Amount
8/29/2019	8/30/2019	Arley's	SQ *ARLEYS TECUMSEH NE	\$ 900.00
9/3/2019	9/4/2019	Arley's	SQ *ARLEYS STEINAUER NE	\$ 1,900.00
9/6/2019	9/9/2019	Arley's	SQ *ARLEYS NEBRASKA CITY NE	\$ 1,900.00
9/17/2019	9/18/2019	Arley's	SQ *ARLEYS STEINAUER NE	\$ 800.00
9/20/2019	9/23/2019	Arley's	SQ *ARLEYS PAPILLION NE	\$ 1,300.00
9/24/2019	9/25/2019	Arley's	SQ *ARLEYS STEINAUER NE	\$ 1,900.00
9/26/2019	9/27/2019	Arley's	SQ *ARLEYS STEINAUER NE	\$ 1,200.00
10/1/2019	10/2/2019	Arley's	SQ *ARLEYS STEINAUER NE	\$ 1,700.00
10/4/2019	10/7/2019	Arley's	SQ *ARLEYS STEINAUER NE	\$ 189.00
10/7/2019	10/8/2019	Arley's	SQ * ARLEYS PAWNEE CITY NE	\$ 540.00
10/10/2019	10/11/2019	Arley's	SQ *ARLEYS STEINAUER NE	\$ 500.00
10/17/2019	10/18/2019	Arley's	SQ *ARLEYS STEINAUER NE	\$ 500.00
10/18/2019	10/21/2019	Arley's	SQ *ARLEYS STEINAUER NE	\$ 1,700.00
10/24/2019	10/25/2019	Arley's	SQ *ARLEYS STEINAUER NE	\$ 1,900.00
10/29/2019	10/30/2019	Arley's	SQ *ARLEYS, LLC PAWNEE CITY NE	\$ 800.00
11/5/2019	11/6/2019	Arley's	SQ *ARLEYS, LLC STEINAUER NE	\$ 1,977.00
11/8/2019	11/12/2019	Arley's	SQ *ARLEYS, LLC STEINAUER NE	\$ 550.00
11/15/2019	11/18/2019	Arley's	SQ *ARLEYS, LLC STEINAUER NE	\$ 390.00
11/20/2019	11/21/2019	Arley's	SQ *ARLEYS, LLC STEINAUER NE	\$ 1,995.00
11/26/2019	11/27/2019	Arley's	SQ *ARLEYS, LLC STEINAUER NE	\$ 1,800.00
12/3/2019	12/4/2019	Arley's	SQ *ARLEYS, LLC STEINAUER NE	\$ 980.00
12/4/2019	12/5/2019	Arley's	SQ *ARLEYS, LLC PAWNEE CITY NE	\$ 1,700.00
12/7/2019	12/9/2019	Arley's	SQ *ARLEYS, LLC STEINAUER NE	\$ 1,200.00
12/10/2019	12/11/2019	Arley's	SQ *ARLEYS, LLC STEINAUER NE	\$ 1,200.00
12/13/2019	12/16/2019	Arley's	SQ *ARLEYS, LLC STEINAUER NE	\$ 245.00
12/15/2019	12/16/2019	Arley's	SQ *ARLEYS, LLC STEINAUER NE	\$ 800.00
12/17/2019	12/18/2019	Arley's	SQ *ARLEYS, LLC STEINAUER NE	\$ 1,820.00
12/24/2019	12/26/2019	Arley's	SQ *ARLEYS, LLC STEINAUER NE	\$ 1,980.00
12/31/2019	1/2/2020	Arley's	SQ *ARLEYS, LLC ORANGE BEACH AL	\$ 1,500.00
1/3/2020	1/6/2020	Arley's	SQ *ARLEYS, LLC STEINAUER NE	\$ 1,900.00
1/11/2020	1/13/2020	Arley's	SQ *ARLEYS, LLC STEINAUER NE	\$ 1,200.00
1/13/2020	1/14/2020	Arley's	SQ *ARLEYS, LLC STEINAUER NE	\$ 220.00
1/15/2020	1/16/2020	Arley's	SQ *ARLEYS, LLC STEINAUER NE	\$ 800.00
1/28/2020	1/29/2020	Arley's	SQ *ARLEYS, LLC THAYER IA	\$ 700.00
2/4/2020	2/5/2020	Arley's	SQ *ARLEY'S, LLC Steinauer NE	\$ 840.00
2/11/2020	2/12/2020	Arley's	SQ *ARLEY'S, LLC Steinauer NE	\$ 1,800.00
2/19/2020	2/20/2020	Arley's	SQ *ARLEY'S, LLC Pawnee City NE	\$ 1,000.00
2/25/2020	2/26/2020	Arley's	SQ *ARLEY'S, LLC Steinauer NE	\$ 1,575.00
2/25/2020	2/26/2020	Arley's	SQ *ARLEY'S, LLC Steinauer NE	\$ 339.00
3/13/2020	3/16/2020	Arley's	SQ *ARLEY'S, LLC Steinauer NE	\$ 1,600.00
3/17/2020	3/18/2020	Arley's	SQ *ARLEY'S, LLC Steinauer NE	\$ 1,999.55
3/19/2020	3/20/2020	Arley's	SQ *ARLEY'S, LLC Steinauer NE	\$ 1,255.00
3/26/2020	3/27/2020	Arley's	SQ *ARLEY'S, LLC Steinauer NE	\$ 1,955.00
4/8/2020	4/9/2020	Arley's	SQ *ARLEYS, LLC STEINAUER NE	\$ 1,100.00
5/19/2020	5/20/2020	Arley's	SQ *ARLEY'S, LLC Steinauer NE	\$ 1,500.00
5/20/2020	5/21/2020	Arley's	SQ *ARLEY'S, LLC Steinauer NE	\$ 379.00
5/26/2020	5/27/2020	Arley's	SQ *ARLEY'S, LLC Steinauer NE	\$ 1,100.00
6/4/2020	6/5/2020	Arley's	SQ *ARLEY'S, LLC Steinauer NE	\$ 520.00
6/23/2020	6/24/2020	Arley's	SQ *ARLEY'S, LLC Steinauer NE	\$ 1,998.78
6/26/2020	6/29/2020	Arley's	SQ *ARLEY'S, LLC Steinauer NE	\$ 500.00
6/29/2020	6/30/2020	Arley's	SQ *ARLEY'S, LLC Pawnee City NE	\$ 979.00
7/13/2020	7/14/2020	Arley's	SQ *ARLEY'S, LLC Steinauer NE	\$ 525.00
Total				\$ 185,458.33

FIVE RIVERS RESOURCE CONSERVATION & DEVELOPMENT, INC.

Exhibit B**Payroll Payments Made to Ms. Meints
January 2020 through October 2022**

Check #	Check Date	Payee	Memo	Amount
	1/15/2020	DIRECT PAY TO NATPAY -11960439 /11960439 FIVE RIVERS RES		\$ 1,185.75
	1/29/2020	DIRECT PAY TO NATPAY -11960439 /11960439 FIVE RIVERS RES		\$ 1,185.75
	2/12/2020	DIRECT PAY TO NATPAY -11960439 /11960439 FIVE RIVERS RES		\$ 1,185.75
	2/26/2020	DIRECT PAY TO NATPAY -11960439 /11960439 FIVE RIVERS RES		\$ 1,185.75
	3/11/2020	DIRECT PAY TO NATPAY -11960439 /11960439 FIVE RIVERS RES		\$ 1,185.75
	3/25/2020	DIRECT PAY TO NATPAY -11960439 /11960439 FIVE RIVERS RES		\$ 1,185.75
	4/7/2020	DIRECT PAY TO NATPAY -11960439 /11960439 FIVE RIVERS RES		\$ 1,185.75
	4/23/2020	DIRECT PAY TO NATPAY -11960439 /11960439 FIVE RIVERS RES		\$ 1,185.75
	8/25/2020	DIRECT PAY TO NAT PAY -11960439 /11960439 FIVE RIVERS RES		\$ 1,185.75
	9/8/2020	DIRECT PAY TO NATPAY -11960439 /11960439 FIVE RIVERS RES		\$ 1,185.75
	9/9/2020	DIRECT PAY TO NATPAY -11960439 /11960439 FIVE RIVERS RES		\$ 1,185.75
	9/22/2020	DIRECT PAY TO NATPAY -11960439 /11960439 FIVE RIVERS RES		\$ 1,185.75
	10/6/2020	DIRECT PAY TO NATPAY -11960439 /11960439 FIVE RIVERS RES		\$ 1,185.75
	10/21/2020	DIRECT PAY TO NATPAY -11960439 /11960439 FIVE RIVERS RES		\$ 1,185.75
	11/4/2020	DIRECT PAY TO NATPAY -11960439 /11960439 FIVE RIVERS RES		\$ 1,185.75
	11/17/2020	DIRECT PAY TO NATPAY -11960439 /11960439 FIVE RIVERS RES		\$ 1,185.75
	12/2/2020	DIRECT PAY TO NATPAY -11960439 /11960439 FIVE RIVERS RES		\$ 1,185.75
	12/15/2020	DIRECT PAY TO NATPAY -11960439 /11960439 FIVE RIVERS RES		\$ 1,185.75
	12/18/2020	DIRECT PAY TO NATPAY -11960439 /11960439 FIVE RIVERS RES		\$ 1,662.30
	12/29/2020	DIRECT PAY TO NATPAY -11960439 /11960439 FIVE RIVERS RES		\$ 1,185.75
	1/13/2021	DIRECT PAY TO NATPAY -11960439 /11960439 FIVE RIVERS RES		\$ 1,186.91
	1/27/2021	DIRECT PAY TO NATPAY -11960439 /11960439 FIVE RIVERS RES		\$ 1,186.91
	2/10/2021	DIRECT PAY TO NATPAY -11960439 /11960439 FIVE RIVERS RES		\$ 1,186.91
	2/24/2021	DIRECT PAY TO NATPAY -11960439 /11960439 FIVE RIVERS RES		\$ 1,186.91
	3/10/2021	DIRECT PAY TO NATPAY -11960439 /11960439 FIVE RIVERS RES		\$ 1,186.91
	4/21/2021	DIRECT PAY TO NATPAY -11960439 /11960439 FIVE RIVERS RES		\$ 1,186.91
	4/21/2021	DIRECT PAY TO NATPAY -11960439 /11960439 FIVE RIVERS RES		\$ 1,186.91
	4/27/2021	DIRECT PAY TO NATPAY -11960439 /11960439 FIVE RIVERS RES		\$ 1,186.91
3944	5/14/2021	Bobbie Meints	Payroll	\$ 1,300.00
	5/20/2021	DIRECT PAY TO NATPAY -11960439 /11960439 FIVE RIVERS RES		\$ 1,186.91
	6/30/2021	DIRECT PAY TO NATPAY -11960439 /11960439 FIVE RIVERS RES		\$ 1,186.91
	7/1/2021	DIRECT PAY TO NATPAY -11960439 /11960439 FIVE RIVERS RES		\$ 1,186.91
3950	7/22/2021	Bobbie Meints	Payroll	\$ 3,091.00
	7/26/2021	DIRECT PAY TO NATPAY -11960439 /11960439 FIVE RIVERS RES		\$ 1,186.91
	7/26/2021	DIRECT PAY TO NATPAY -11960439 /11960439 FIVE RIVERS RES		\$ 1,186.91
	7/28/2021	DIRECT PAY TO NATPAY -11960439 /11960439 FIVE RIVERS RES		\$ 1,186.91
	8/3/2021	DIRECT PAY TO NATPAY -11960439 /11960439 FIVE RIVERS RES		\$ 1,186.91
	8/11/2021	DIRECT PAY TO NATPAY -11960439 /11960439 FIVE RIVERS RES		\$ 1,186.91
	8/25/2021	DIRECT PAY TO NATPAY -11960439 /11960439 FIVE RIVERS RES		\$ 1,186.91
	9/8/2021	DIRECT PAY TO NATPAY -11960439 /11960439 FIVE RIVERS RES		\$ 1,186.91
	9/22/2021	DIRECT PAY TO NATPAY -11960439 /11960439 FIVE RIVERS RES		\$ 1,186.91
	10/15/2021	DIRECT PAY TO NATPAY -11960439 /11960439 FIVE RIVERS RES		\$ 1,186.91
3968	10/29/2021	Bobbie Meints	Payroll	\$ 1,186.91
3973	12/10/2021	Bobbie Meints	Payroll x 1	\$ 1,186.91
3974	12/10/2021	Bobbie Meints	Payroll x 2	\$ 1,186.91
3975	12/10/2021	Bobbie Meints	Payroll x 3	\$ 1,186.91
	12/15/2021	DIRECT PAY NATPAY -11960439 /11960439 FIVE RIVERS RES		\$ 1,186.91
	1/25/2022	DIRECT PAY NATPAY -11960439 /11960439 FIVE RIVERS RES		\$ 1,188.35
	1/25/2022	DIRECT PAY NATPAY -11960439 /11960439 FIVE RIVERS RES		\$ 1,188.35
	1/26/2022	DIRECT PAY NATPAY -11960439 /11960439 FIVE RIVERS RES		\$ 1,188.35
	5/18/2022	DIRECT PAY NATPAY -11960439 /11960439 FIVE RIVERS RES		\$ 1,191.75
	5/27/2022	REVERSAL NATPAY-119604XX XXX60439/FIVE RIVERS RES		\$ (1,191.75)
3906	7/11/2022	Bobbie Meints	Payroll	\$ 1,191.75
	7/27/2022	DIRECT PAY NATPAY -11960439 /11960439 FIVE RIVERS RES		\$ 1,191.75
3989	8/25/2022	Bobbie Meints	Payroll x 5	\$ 6,464.59

FIVE RIVERS RESOURCE CONSERVATION & DEVELOPMENT, INC.

Exhibit B

**Payroll Payments Made to Ms. Meints
January 2020 through October 2022**

Check #	Check Date	Payee	Memo	Amount
	8/30/2022	DIRECT PAY NATPAY -11960439 /11960439 FIVE RIVERS RES		\$ 1,191.75
	9/7/2022	DIRECT PAY NATPAY -11960439 /11960439 FIVE RIVERS RES		\$ 1,191.75
	9/7/2022	DIRECT PAY NATPAY -11960439 /11960439 FIVE RIVERS RES		\$ 1,191.75
	9/7/2022	DIRECT PAY NATPAY -11960439 /11960439 FIVE RIVERS RES		\$ 1,191.75
	9/21/2022	DIRECT PAY NATPAY -11960439 /11960439 FIVE RIVERS RES		\$ 1,191.75
3985	9/22/2022	Bobbie Meints	Personnel/Payroll	\$ 1,191.75
3983	9/30/2022	Bobbie Meints	Payroll	\$ 1,191.75
3987	10/12/2022	Bobbie Meints	Payroll x 2	\$ 2,383.50
3995	10/24/2022	Bobbie Meints	Payroll x 2	\$ 2,383.48
4000	10/28/2022	Bobbie Meints	Payroll x 2	\$ 2,383.50
Total				\$ 86,161.17