



COMPTROLLER'S INVESTIGATIVE REPORT

Middle Tennessee State University - Somali Students Association and Muslim Students Association

March 10, 2021

Jason E. Mumpower
Comptroller of the Treasury



DIVISION OF INVESTIGATIONS



JASON E. MUMPOWER
Comptroller

March 10, 2021

Dr. Sidney McPhee and
Board of Trustees
Middle Tennessee State University
1301 East Main Street
Murfreesboro, TN 37132

Dr. McPhee and Board Members:

The Office of the Comptroller of the Treasury conducted an investigation of selected records of Middle Tennessee State University - Somali Students Association and Muslim Students Association, and the results are presented herein.

Copies of this report are being forwarded to Governor Bill Lee, the State Attorney General, the District Attorney General of the 16th Judicial District, certain state legislators, and various other interested parties. A copy of the report is available for public inspection in our Office and may be viewed at <http://www.comptroller.tn.gov/ia/>.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jason E. Mumpower", with a long horizontal flourish extending to the right.

Jason E. Mumpower
Comptroller of the Treasury

JEM/MLC

INVESTIGATIVE REPORT

Middle Tennessee State University – Somali Students Association and Muslim Students Association

The Office of the Comptroller of the Treasury, in conjunction with the Tennessee Bureau of Investigation, investigated allegations of malfeasance related to the Somali Students Association (SSA) and the Muslim Students Association (MSA) at Middle Tennessee State University (MTSU). The Comptroller’s Office initiated the investigation after MTSU Internal Audit personnel notified the Comptroller’s Office of suspected improper payments to the SSA. The investigation was limited to selected records for the period September 2017 through November 2020. The results of the investigation were communicated with the Office of the District Attorney General of the 16th Judicial District.

BACKGROUND



MTSU promotes student involvement in extracurricular activities by officially recognizing student organizations that represent the interests of the student body. All MTSU students enrolled in seven or more credit hours per semester pay a \$40 Student Activity Fee (SAF) to MTSU. Sixteen dollars of each student’s SAF are allocated to student organizations, and officially recognized

student organizations are eligible to apply for awards of SAF each semester. The MTSU Student Activity Fee Award Committee (SAFAC) establishes SAF award amounts for eligible organizations. All awarded funds are remitted strictly on a reimbursement basis. The MTSU Student Organizations and Service Office (office) processes requests for SAF reimbursements by reviewing documentation submitted by eligible student organizations.

The SSA was founded in 2017 by Mohamed Gure, a MTSU student. Its stated purpose is to meet the academic, social, and cultural needs of MTSU’s Somali students. The SSA was reimbursed over \$85,000 during the period reviewed. Gure served as the organization’s president from 2017 to 2019, and then Mohamed Osman, another MTSU student, took over as president in 2019. Investigators extended their review into the MSA after discovering that Gure was also a MSA

board member in 2017 and 2018. The MSA was reimbursed over \$28,000 during the period reviewed. Investigators obtained bank records of both the SSA and the MSA and determined that nearly all funds were used to personally benefit Gure and Osman as opposed to MTSU’s Somali and Muslim students.

During the fall 2020 semester, officials in the office became suspicious of the SSA’s reimbursement requests. The SSA submitted requests for \$23,000 of SAF in that semester, but the office did not reimburse it. Gure and Osman are current students at MTSU as of the spring 2021 semester, and the SSA applied for eligibility to receive more than \$40,000 of SAF for that term.

RESULTS OF INVESTIGATION

- **TWO MTSU STUDENTS MISAPPROPRIATED \$114,145 FROM THE UNIVERSITY**

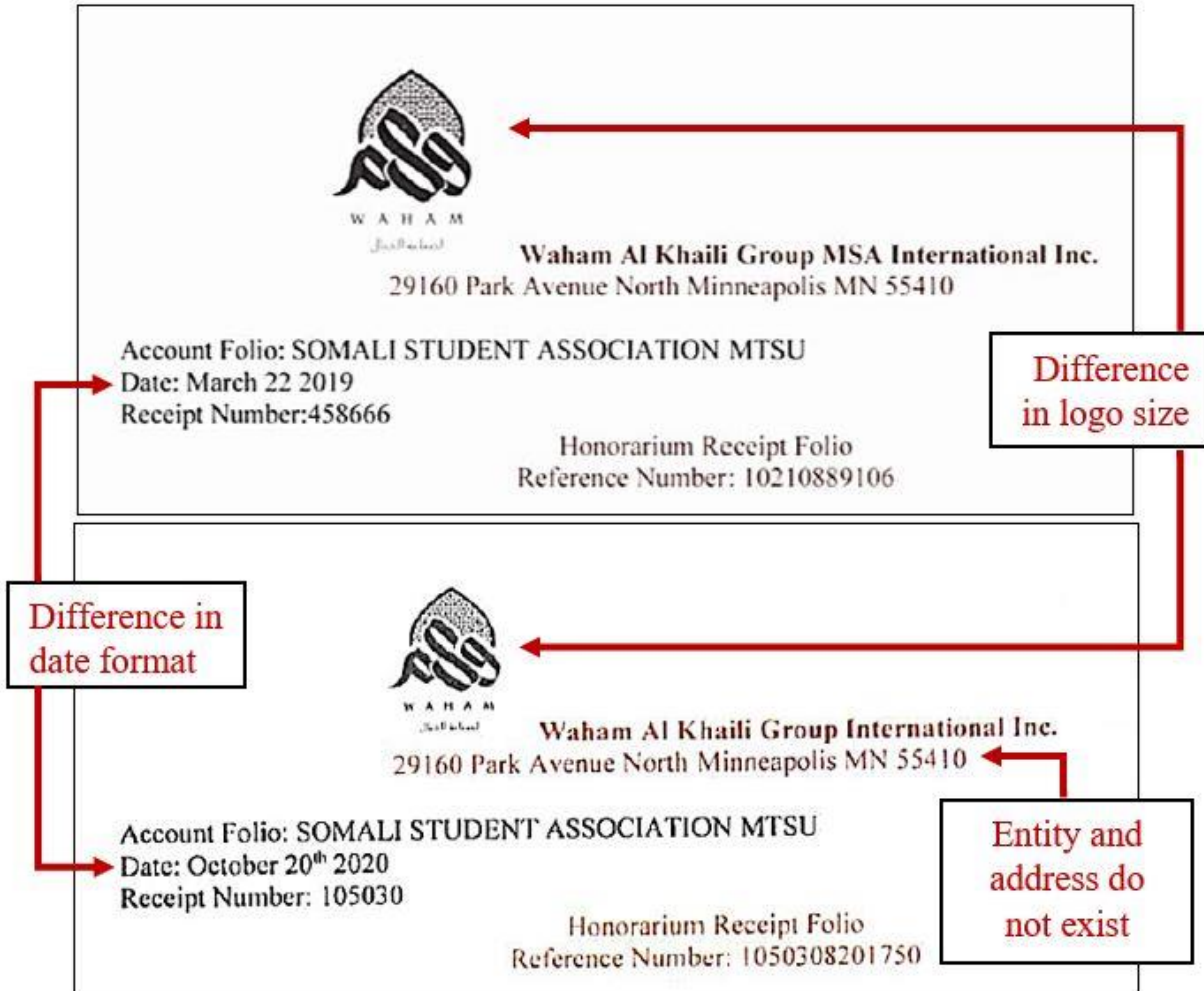
- A. Mohamed Gure and Mohamed Osman misappropriated \$85,200 from MTSU by submitting fabricated or falsified invoices and receiving funds through the Somali Students Association.**

- i. *Misappropriation via reimbursement payments from Student Activity Fees totaled \$82,200.*

During the period November 2017 through November 2020, Gure and Osman fabricated or falsified invoices for expenditures that the SSA never incurred. At least 85 fabricated or falsified invoices were submitted to MTSU for the SSA to obtain reimbursement, and 83 of those invoices were related to reimbursement requests for SAF funds. Many invoices were for payments to non-existent vendors. Other invoices were purportedly for payments to legitimate vendors, but the payments were either refunded or were never made. Under other circumstances, legitimate invoices for actual transactions were submitted for reimbursement, but those transactions had nothing to do with the SSA or the purpose of the reimbursement request.

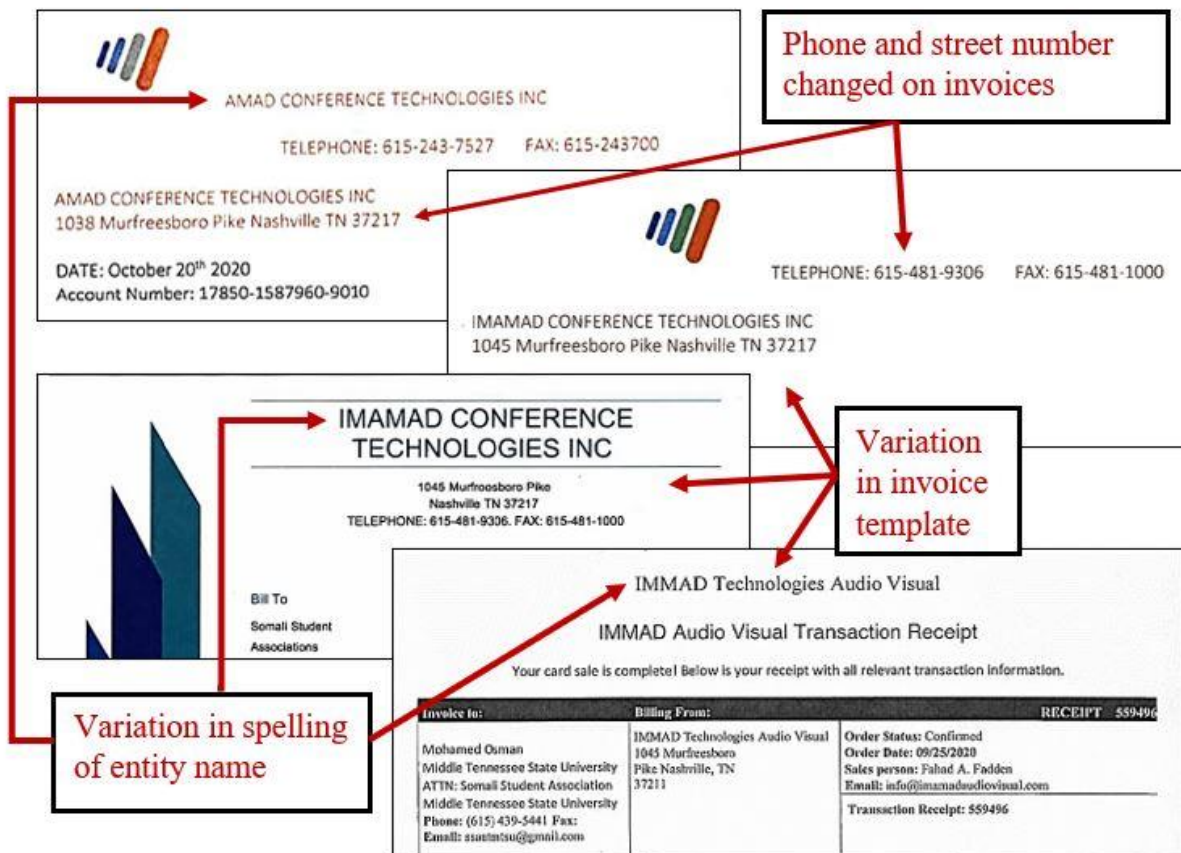
One of the SSA’s primary purposes was to host events featuring public speakers to discuss topics relevant to the Somali student population at MTSU. Investigators’ review of documents indicated that the invoices submitted by the SSA for purported payments to speakers, event venues, transportation, and other purposes were for events that never took place. A commonly reimbursed expenditure was honorarium payments for public speakers. Investigators noted instances where listed speakers were real people, but other evidence revealed that the SSA’s events never occurred, so those people could not have spoken at the noted events. Therefore, the submissions made by Gure and Osman related to those transactions were fabricated documents.

Exhibit 1



Two fabricated invoices for honorarium payments submitted by the SSA. Investigators determined that Waham Al Khaili Group International Inc. entity and address do not exist.

Exhibit 2



Four fabricated invoices submitted for reimbursement by the SSA. These invoices appeared to be from the same audio-visual services vendor, but investigators determined the vendor does not exist.

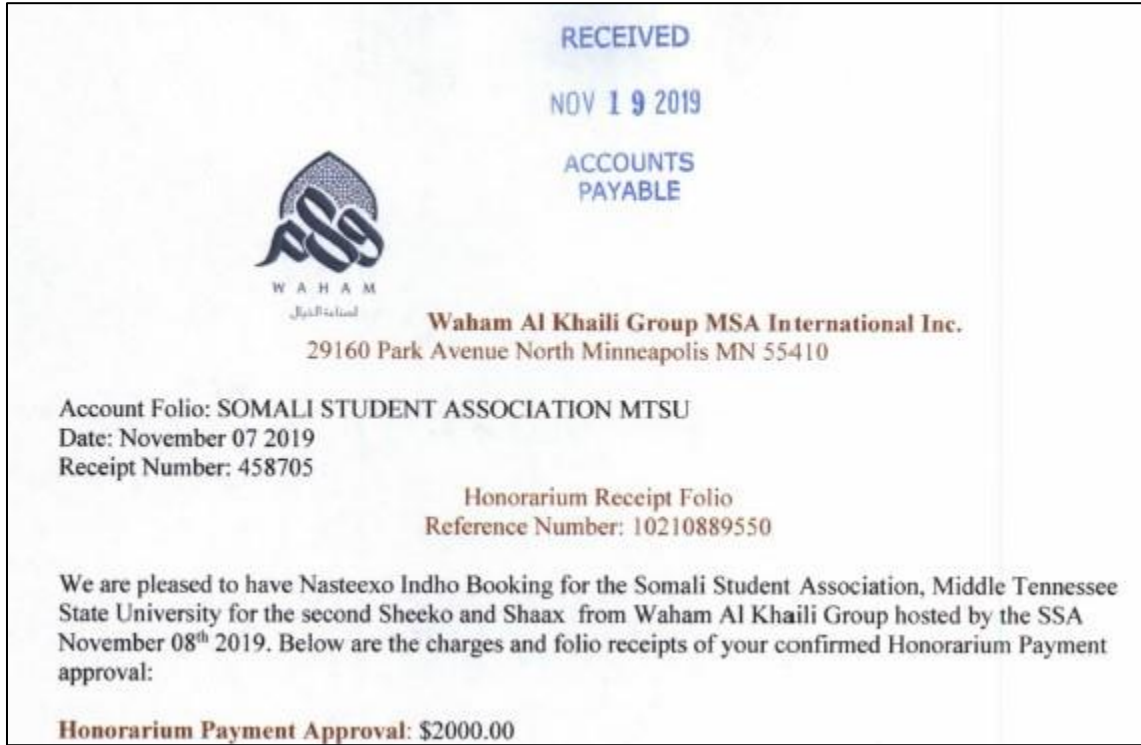
- ii. *Misappropriation via reimbursement payments from the Tina Stewart Campus Nonviolence Fund totaled \$3,000.*

In fall 2017, MTSU’s Student Government Association (SGA) created the Tina Stewart Campus Nonviolence Fund. The SGA disburses funds annually to nonviolence campaigns in honor of Tina Stewart, a MTSU student who was the victim of an act of violence. MTSU’s Campus Nonviolence Committee reviews and approves all applications submitted for those funds. Recipients must submit original invoices showing they have paid for approved items outlined in an award letter from the committee. Once the invoices are submitted, reimbursements are paid.

The SSA submitted two fabricated invoices purportedly for honorarium payments for public speakers to obtain funds for events that were never held. As a result, the SSA received \$1,500 from the Tina Stewart Campus Nonviolence Fund in both the

2018-2019 and 2019-2020 school years. Investigators noted that the invoices were nearly identical to another invoice submitted by the SSA for a SAF reimbursement.

Exhibit 3



Fabricated invoice submitted for reimbursement from the Tina Stewart Campus Nonviolence Fund in 2019.

SUMMARY OF MISAPPROPRIATIONS	
Somali Students Association	Amount
i. Misappropriation of Student Activity Funds	\$ 82,200.00
ii. Misappropriation of Tina Stewart Campus Nonviolence Funds	3,000.00
Total SSA Misappropriations	\$ 85,200.00

B. Mohamed Gure misappropriated \$28,945 from MTSU by submitting fabricated or falsified invoices and receiving funds through the Muslim Students Association.

During the period November 2017 through May 2018, Gure fabricated or falsified invoices for expenditures that the MSA never incurred. At least 28 fabricated or falsified invoices were submitted to MTSU for the MSA to obtain reimbursements from SAF funds. Many invoices were for payments to non-existent vendors. Other invoices were purportedly for

payments to legitimate vendors, but the payments were either refunded or were never made. Under other circumstances, legitimate invoices from actual transactions were submitted for reimbursement, but those transactions had nothing to do with the MSA or the purported purpose of the reimbursement request.

Exhibit 4

Receipt 3010110	BARWAAGO PLAZA SHOPPING CENTER		
	613 MUFREESBORO PIKE TN 37210 PHONE: (615) 5741285 FAX: (615)244 5510		
Bill To		Receipt Date	09/14/2017
ATTN:MOHAMED HAJI GURE MUSLIM STUDENT ASSOCIATION MTSU 1301 E MAINT ST MURFREESBORO MTSU BOX 19		P.O.#	5890
		Due Date	09/15/2017

Fabricated invoice submitted for SAF reimbursement to MSA in 2017.

SUMMARY OF ALL MISAPPROPRIATIONS	
Somali Students Association & Muslim Students Association	Amount
A. Misappropriation via Somali Students Association	\$ 85,200
B. Misappropriation via Muslim Students Association	28,945
Total Misappropriations	\$ 114,145

On March 9, 2021, the Rutherford County Grand Jury indicted Mohamed Gure on one count of Theft over \$60,000, one count of Theft over \$10,000, thirty counts of Forgery, and two counts of Criminal Simulation.

On March 9, 2021, the Rutherford County Grand Jury indicted Mohamed Osman on one count of Theft over \$60,000, twenty-eight counts of Forgery, and two counts of Criminal Simulation.

[Middle Tennessee State University – Somali Students Association and Muslim Students Association Investigation Exhibit](#)

INTERNAL CONTROL AND COMPLIANCE DEFICIENCIES

The Student Organizations and Service Office at MTSU is directed by various internal policies and procedures including MTSU's *Student Activity Fee Guidelines* and the *Student Organization Handbook*. Those policies identify criteria of what may and may not be reimbursed with SAFs. The policies also require the review of supporting documentation by university officials prior to the disbursement of funds to ensure that established criteria have been met. The failure of MTSU officials to ensure proper compliance with MTSU policies related to reimbursement payments to student organizations permitted the students' schemes to continue without prompt detection.

Deficiency: The Student Organizations and Service Office and the SSA and MSA faculty advisors did not adequately review supporting documentation submitted for reimbursement by Gure and Osman.

Investigators noted the following deficiencies:

1. Documentation provided for reimbursement did not comply with MTSU's guidelines related to the use of debit cards by student organizations. The *Student Organization Handbook* provides that the use of debit cards by student organizations is strictly prohibited. Investigators noted the overwhelming majority of documentation submitted by the SSA and the MSA supported purchases made with debit or credit cards. MTSU officials asked no follow-up questions to ascertain the nature of those expenditures and whether the expenditures were eligible for reimbursement.
2. Documentation provided for reimbursement did not comply with MTSU's guidelines related to the approval of disbursements and withdrawals from student organizations' accounts. The *Student Organization Handbook* provides that all withdrawals or disbursements from student organizations' accounts require dual signature approval. None of the documentation submitted for reimbursement by the SSA or the MSA contained any such

documentation, and the office did not ask follow-up questions to ascertain the nature of those expenditures and whether the expenditures were eligible for reimbursement.

3. Some documentation submitted by the SSA did not appear to comply with the requirement for purchases to occur prior to being reimbursed. Investigators noted occasions where the purported purchase made by the SSA was dated after the reimbursement request date and therefore would not have been eligible for reimbursement. The office did not ask follow-up questions to ascertain the nature of those expenditures and whether the expenditures were eligible for reimbursement.
4. MTSU paid the MSA and the SSA a total of \$45,220 in reimbursement (included in misappropriation) payments for purported travel to conferences during the period reviewed by investigators. The *Student Organization Handbook* requires student organizations to submit information about all MTSU students and employees who are traveling with a student organization prior to leaving for each trip. The MSA and the SSA did not submit any such documentation to the office for the five trips that MTSU reimbursed them.
5. While the SSA and the MSA had faculty advisors each semester, it does not appear that any of those advisors provided oversight related to the groups' finances and reimbursement requests to the university. According to an agreement signed by each faculty advisor of the student organizations at the start of every school year, advisors are expected to "advise and consult with the organization and its officers in its financial affairs...[and] to see the proper disbursement of, and accounting for, funds of the organization."

University officials indicated that they have corrected or intend to correct these deficiencies.
