



COMPTROLLER'S INVESTIGATIVE REPORT

Davis House Child Advocacy Center

May 29, 2025

Jason E. Mumpower
Comptroller of the Treasury



DIVISION OF INVESTIGATIONS



JASON E. MUMPOWER
Comptroller

May 29, 2025

Board of Directors
140 Southeast Parkway Court
Franklin, TN 37064

Davis House Child Advocacy Center Management:

The Office of the Comptroller of the Treasury conducted an investigation of selected records of the Davis House Child Advocacy Center, and the results are presented herein.

Copies of this report are being forwarded to Governor Bill Lee, the State Attorney General, the District Attorneys General of the 21st and 32nd Judicial Districts, 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", written over a light blue circular stamp.

Jason E. Mumpower
Comptroller of the Treasury

JEM/MLC

INVESTIGATIVE REPORT

Davis House Child Advocacy Center

The Office of the Comptroller of the Treasury investigated allegations of malfeasance related to the Davis House Child Advocacy Center. The investigation was limited to selected records for the period January 2020 through August 2024. The results of the investigation were communicated with the Office of the District Attorney General of the 21st Judicial District and the Office of the District Attorney General of the 32nd Judicial District.

BACKGROUND



Formed in 1999, the Davis House Child Advocacy Center (DHCAC), previously known as the Williamson County Child Advocacy Center, Inc., is a nonprofit organization whose mission is to combat child abuse by coordinating services to children and their families in crisis and providing community education focused on prevention and early intervention.

DHCAC receives funds from various sources, including government grants and contracts, individual, corporate, and municipal contributions, and several fundraisers organized throughout each year. During the investigative period, DHCAC coordinated with the investigation, reporting, and prosecution of child abuse cases within the 21st and 32nd Judicial Districts. For the investigative period, DHCAC served a governmental function and received at least \$5,287,078.89 in total support and revenue funding, of which approximately 33% originated from government sources.

As of August 2024, DHCAC had 11 employees, offices in three different locations, and served Williamson, Hickman, Lewis, and Perry counties. DHCAC is governed by the Board of Directors, which hires the Executive Director, who is responsible for the administration and day-to-day operations of the entity. The former executive director managed the entity between May 2020 through April 2023, and the current executive director has managed the entity since May 2023.

RESULTS OF INVESTIGATION

1. INVESTIGATORS QUESTION SPENDING PATTERNS BY DAVIS HOUSE CHILD ADVOCACY CENTER OFFICIALS

Given DHCAC's reliance on government funding and public support, investigators question DHCAC officials' spending patterns on unnecessary, unsupported, and questionable expenses while maintaining high and increasing credit card balances, incurred interest and other charges,

and routinely spending more money than the entity could generate, a pattern indicating wasteful spending.

For the investigative period, DHCAC officials used two credit card accounts opened at two different financial institutions as follows:

- Credit Card #1 was opened in the summer of 2020 and closed in August 2023, but DHCAC officials failed to retain the account statements during that period. Investigators reviewed the statements between September 2021 and June 2023, covering 20 months, with some statements missing between these dates, as those were the only statements that DHCAC officials retained and provided to investigators upon request. This credit card was mainly used during the former executive director's tenure, with him and another former employee listed as the cardholders on this account.
- Credit Card #2 was opened in May 2023. Investigators reviewed the statements between May 2023 and August 2024, covering 16 months. This credit card was used during the current executive director's tenure with her and another former employee listed as the cardholders on this account.

A. Questionable spending patterns

Questionable transactions identified for Credit Card #1

Between November and December 2021, Credit Card #1 was charged \$8,623.56, including three transactions totaling \$1,359.78 that were classified in DHCAC's general ledger as "Staff Christmas Gifts" (**Refer to Exhibit 1**).

Exhibit 1

11/19/2021	LLBEAN-DIRECT 800-341-4341 ME	\$	(1,027.44)
12/06/2021	HOBBY-LOBBY 263 FRANKLIN TN	\$	(36.01)
12/07/2021	SP ALMOST MAKES SCEN	\$	(296.33)

Three credit card transactions classified in the general ledger as "Staff Christmas Gifts"

Further, in October 2022, Credit Card #1 had a balance of \$10,556.49. Between October and November 2022, the former executive director charged Credit Card #1 at least \$2,800.32 for the expenses associated with his attendance at the 2022 Global Exchange Conference in Florida (**Refer to Finding 2**). DHCAC officials described the conference as "optional training" and stated that no other DHCAC personnel had attended the event since November 2022. In December 2022, the balance for Credit Card #1 increased to \$13,031.25.

Questionable transactions identified for Credit Card #2

Between March and May 2024, Credit Card #2's monthly balance exceeded \$20,000. During this period, the current executive director made two credit card charges, totaling \$120. In

March 2024, a charge of \$70 was made at a beauty salon, and in May 2024, a charge of \$50 was made to purchase a gift card (**Refer to Exhibit 2**). DHCAC officials described to investigators that these purchases were gifts to employees and classified them in DHCAC's general ledger as "Employee Goodwill".

Exhibit 2

03/13/2024	5977 BLO BLOW DRY BAR - TN HTTPSBLOMEDRY TN	\$ (70.00)
05/02/2024	0174 CS SEPHORA EGIFTCARD 866-286-1262 ME	\$ (50.00)

Credit card transactions classified in the general ledger as "Employee Goodwill"

B. A pattern of recurring and increasing operational deficit

Between 2020 and 2023, DHCAC spent more money than it could generate from revenue sources. Investigators summarized the financial information below from DHCAC's audit reports (**Refer to Table 1**).

Table 1

	*2020	*2021	*2022	*2023
**Change in Net Assets (Surplus/Deficit)	(\$963)	(\$55,962)	\$55,735	(\$118,410)
	Deficit	Deficit	Surplus	Deficit

*For the year ending June 30.

**Change in Net Assets is an accounting term used to determine whether the entity operated in a surplus or a deficit. It was calculated as total public support and revenue sources, less total expenses. Operating in surplus means the entity generated more funds than it spent, and operating in deficit means it spent more than it could generate.

Although the DHCAC audit report for the year ending 2024 was not available, officials told investigators that in 2024, the entity experienced financial difficulties in meeting the employees' payroll obligations and meeting the required reimbursements for travel expenses, further indicating a pattern of recurring and increasing operational deficit.

C. A pattern of high and increasing credit card balances

Between 2020 and 2024, DHCAC credit card balances were consistently high while incurring interest, fees, and other charges (**Refer to Table 2**).

Table 2

Date	*Credit Card #1	Credit Card #2
Highest Balance	\$ 13,754.58	\$ 24,807.33
Average Balance	\$ 8,057.66	\$ 14,598.59
Interest Charges and Fees for Late Payments	\$ 1,015.29	\$ 19.00

*Information based on incomplete credit card statements retained by DHCAC.

Financial transparency and accountability are crucial for maintaining public trust, especially for nonprofit organizations that rely on government funding and donations. Operating within a budget means managing an organization's resources and expenses to stay within financial limits. These measures ensure the responsible use of funds and prevent the misuse of money for unauthorized purposes, which ultimately helps fulfill the entity's mission and goals.

2. DAVIS HOUSE CHILD ADVOCACY CENTER OFFICIALS MADE UNSUPPORTED AND QUESTIONABLE CREDIT CARD CHARGES TOTALING AT LEAST \$250,709.78

Our investigation revealed that DHCAC's two credit cards, funded through donations, fundraisers, and various sources, were used for unsupported transactions and questionable purposes.

A. DHCAC officials failed to retain supporting documentation justifying at least \$250,453.33 in questionable credit card charges

Our investigation found that the DHCAC officials failed to retain supporting documentation justifying charges made on both credit cards, totaling at least \$250,453.33 (**Refer to Table 3**). Investigators categorized credit card transactions, provided by DHCAC officials, in the table below.

Table 3

Category of Transactions	Credit Card #1		Credit Card #2	
	# of Transactions	Amount	# of Transactions	Amount
Travel-related charges	201	\$ 46,323.86	39	\$ 7,118.61
Charges at various retail stores	291	33,651.80	209 (Exhibit 5)	28,254.53
Restaurants and alcohol purchases	115 (Exhibit 3)	17,356.95	48 (Exhibit 6)	5,299.54
Hulu (streaming subscription)	19	1,472.68		
Transportation service payments	6	1,126.30		
Entertainment charges	3 (Exhibit 4)	1,121.00	3	2,183.74
Payment for moving service	1	962.50	1	5,450.00
Medical training charges	4	268.00		
Gas station charges	2	89.10		
Miscellaneous	205	61,486.51	135	38,288.21
Total	847	\$ 163,858.70	435	\$ 86,594.63
	\$ 250,453.33			

Investigators identified unsupported charges on Credit Card #1, including transactions at restaurants, for alcohol, and for entertainment purposes (**Refer to Exhibit 3 and Exhibit 4**). DHCAC officials told investigators that purchases at restaurants and for alcohol were for donors,

board members, visitors, and employees during meetings, events, or fundraisers. Some charges were made at upscale restaurants during DHCAC staff travel for training or conferences. DHCAC officials told investigators these purchases were made using the credit card instead of reimbursing employees with per-diem government rates while on official travel, as outlined in DHCAC's *Personnel Policies and Procedures*. Some charges do not appear to be group purchases but instead appear to be a meal for one individual. Due to the lack of records, it is unclear what was purchased, for how many people, and for what purpose. DHCAC officials also told investigators the charges for entertainment were gifts to employees as part of team-building activities.

Exhibit 3

10/06/2021	J ALEXANDER S 01000025 FRANKLIN TN	\$	(42.39)
10/18/2021	CASE SELECTS WINE AND SP FRANKLIN TN	\$	(172.27)
10/20/2021	SQ HANK S DINER Hohenwald TN	\$	(13.68)
11/07/2021	PERRY S STEAKHOUSE & G FRANKLIN TN	\$	(636.37)
11/16/2021	COAL S ARTISAN PIZ SDF LOUISVILLE KY	\$	(21.67)
11/17/2021	MEDIUM RARE CLEVELAND 703-9898547 DC	\$	(551.51)
11/20/2021	DCA WOW BAO PIER C ARLINGTON VA	\$	(14.28)
01/05/2022	SERRATO STEAKHOUSE FRANKLIN TN	\$	(79.66)
02/24/2022	ZAXBY S 31302 LEXINGTON KY	\$	(7.62)
04/22/2022	TST CORNER PUB FRANKLIN 615-595-7447 TN	\$	(121.28)
06/05/2022	STARBUCKS STORE 49899 WASHINGTON	\$	(8.80)
06/09/2022	COMPERE LAPIN NEW ORLEANS LA	\$	(573.93)
11/18/2022	EUROPAN CAFE NEW YORK NY	\$	(8.98)
01/20/2023	CHIPOTLE 2785 BOWLING GREENKY	\$	(13.36)
03/20/2023	BJ S RESTAURANTS 573 HUNTSVILLE AL	\$	(183.81)

Examples of restaurant charges and at least one alcohol purchase made using Credit Card #1

Exhibit 4

11/08/2021	TRUSTEDTOURS_COM TICKETS 800-8447601	\$	(324.00)
06/07/2022	FH NEW ORLEANS GHOST	\$	(477.00)
09/16/2022	EXTREME ESCAPE GAMES FRANKLIN TN	\$	(320.00)

Examples of entertainment charges made using Credit Card #1

Investigators identified purchases made at retail stores and restaurants on Credit Card #2 (**Refer to Exhibit 5 and Exhibit 6**). DHCAC officials told investigators that the retail purchases were for DHCAC office use or DHCAC-related events. The purchases were not adequately supported and often lacked any documentation, and therefore, investigators could not determine if they benefited DHCAC. DHCAC officials told investigators that restaurant purchases on Credit Card #2, as with Credit Card #1, were for employees, donors, board members, and visitors.

Exhibit 5

06/11/2023	9966 TARGET 00006957 FRANKLIN TN	\$ (29.96)
06/27/2023	2744 COSTCO WHSE 1448 MURFREESBORO TN	\$ (88.62)
07/15/2023	1785 DOLLAR TREE FRANKLIN TN	\$ (52.13)
07/19/2023	1512 OFFICE DEPOT 3356 FRANKLIN TN	\$ (122.81)
08/21/2023	9804 PUBLIX 1234 863-688-1188 TN	\$ (149.22)
09/25/2023	8984 KROGER 570 FRANKLIN TN	\$ (93.70)
10/28/2023	7605 AT HOME STORE 107 FRANKLIN TN	\$ (131.67)
11/01/2023	4845 WF WAYFAIR3988912529 866-263-8325 MA	\$ (3,365.95)
11/02/2023	5330 AMZN Mlctp US ZL74L5RC3 Amzn_com/bill W/	\$ (741.57)
11/11/2023	7913 PUBLIX 176 FRANKLIN TN	\$ (49.39)
11/14/2023	9914 AT HOME STORE 107 FRANKLIN TN	\$ (563.87)
11/27/2023	9007 KROGER 570 FRANKLIN TN	\$ (14.38)
11/28/2023	7706 TARGET 00019638 FRANKLIN TN	\$ (149.44)
12/06/2023	2242 BRILLIANT SKY TOYS AND 615-3090557 TN	\$ (54.30)

Examples of retail store charges made using Credit Card #2

Exhibit 6

08/07/2023	4222 DD DOORDASH CHIPOTLE 855-973-1040 CA	\$ (25.83)
08/16/2023	8770 CHICK-FIL-A 02179 FRANKLIN TN	\$ (122.92)
09/12/2023	0092 TAZIKISFRAN 615-290-5236 TN	\$ (162.14)
09/18/2023	0182 CASA JOSE MEXICAN REST FRANKLIN TN	\$ (161.43)
10/06/2023	0429 SQ MOE BETTER BBQ AND Franklin TN	\$ (21.00)
10/12/2023	0012 PERRY S STEAKHOUSE & G FRANKLIN TN	\$ (50.00)
11/07/2023	4847 CHUY S OLO 016 615-778-2878 TN	\$ (239.05)
11/10/2023	4349 PIZZA HUT 004370 https://ipcha TN	\$ (98.74)
11/28/2023	5132 CRACKER BARREL 134 FR 615-794-8195 TN	\$ (174.38)
02/21/2024	0337 THE WHITE ALLIGATOR FRANKLIN TN	\$ (125.11)
03/08/2024	0201 Franklin Chop House Franklin TN	\$ (65.95)
05/25/2024	1427 PANERA BREAD 601013 0 615-599-1974 TN	\$ (54.00)
06/02/2024	0357 PANERA BREAD 601013 0 615-599-1974 TN	\$ (62.00)
06/08/2024	6896 PANERA BREAD 601013 0 615-599-1974 TN	\$ (44.79)
06/09/2024	0638 PANERA BREAD 601013 0 615-599-1974 TN	\$ (80.69)

Examples of restaurant charges made using Credit Card #2

While DHCAC officials provided explanations for some of the credit card charges, due to the lack of records, investigators could not determine whether all transactions were made exclusively for the benefit of DHCAC.

B. The former executive director made personal purchases of at least \$345.55

Further, investigators found that the former executive director used Credit Card #1 to make personal purchases of at least \$345.55.

- In December 2021 and September 2022, the former executive director used Credit Card #1 to purchase personal fuel totaling \$89.10 (**Refer to Table 3**). The former executive director told investigators that he used Credit Card #1 for a membership discount. He also stated that he had already repaid this amount to DHCAC, but did not provide any record of doing so. DHCAC records provided to investigators do not contain evidence that the former executive director made a repayment to DHCAC.
- In November 2022, the former executive director attended the 2022 Global Exchange Conference at the Walt Disney World Dolphin Resort in Lake Buena Vista, Florida. DHCAC paid all related expenses, including registration fees, travel, lodging, and meals. While attending the conference, the former executive director used Credit Card #1 on at least 17 occasions, totaling at least \$256.45 in personal purchases (**Refer to Table 4**). These credit card charges included purchases at multiple amusement park gift shops, an amusement park ticket add-on charge, and multiple charges at vending machines and food establishments.

DHCAC officials failed to retain the October-November 2022 credit card statement. Investigators identified the charges from the 2022-2023 general ledger provided by DHCAC officials.

Table 4

#	Date	Description	Amount
1	10/31/2022	EC La Bottega Italiana Merchandise POS	\$ 24.01
2	10/31/2022	WDW TICKET ADD ON 407-828-5630 FL	15.98
3	10/31/2022	NAYAX VENDING 2 HUNT VALLEY MD	2.00
4	10/31/2022	WDW TICKET ADD ON 407-828-5630 FL	14.91
5	11/01/2022	Canteen Vend1 1800CANTEENHUNT VALLEY MD	2.25
6	11/01/2022	Canteen Vend1 1800CANTEENHUNT VALLEY MD	4.00
7	11/01/2022	Canteen Vend1 1800CANTEENHUNT VALLEY MD	2.25
8	11/01/2022	Canteen Vend1 1800CANTEENHUNT VALLEY MD	4.00
9	11/01/2022	CASEY'S CORNER 407-828-5630 FL	18.40
10	11/02/2022	SHERATON DOLPHIN DINING ORLANDO FL	9.32
11	11/02/2022	SHERATON DOLPHIN DINING ORLANDO FL	17.84
12	11/03/2022	BUENA VISTA CONCESSIONS IORLANDO FL	17.57
13	11/03/2022	SHERATON DOLPHIN DINING ORLANDO FL	15.98
14	11/03/2022	ST Mickey's of Hollywood Merchandise POS	71.33
15	11/04/2022	MCO WENDY'S ORLANDO FL	3.29
16	11/04/2022	MANCHU WOK 407-8254126 FL	15.21
17	11/04/2022	SHERATON DOLPHIN DINING ORLANDO FL	18.11
Total			\$ 256.45

On February 7, 2025, the former executive director told investigators that these credit card charges made in Florida during the 2022 conference were his personal purchases, and he thought he had already repaid DHCAC. However, he could not provide any record of repayment. DHCAC records do not contain evidence that this money was repaid.

On February 20, 2025, the former executive director sent DHCAC a check for \$253.44 to repay his personal credit card charges. The table below summarizes the former executive director's personal use of Credit Card #1 and subsequent repayment (**Refer to Table 5**).

Table 5

Description	Amount
Personal Fuel Purchases	\$ 89.10
Personal Charges while attending the 2022 Global Exchange Conference	\$ 256.45
Total Personal Charges Using DHCAC Credit Card	\$ 345.55
<i>Less: Repayment in February 2025</i>	<i>(\$253.44)</i>
Outstanding Balance of Personal Charges Without Any Record of Its Repayment to DHCAC	\$ 92.11

The table below summarizes unsupported and questionable charges using Credit Card #1 and Credit Card #2 made during the tenures of the current and former executive directors (**Refer to Table 6**).

Table 6

Description	Amount
A Unsupported Credit Card Charges	\$ 250,453.33
B Personal Fuel Purchases	\$ 0*
Personal Charges while attending the 2022 Global Exchange Conference	\$ 256.45
Total Unsupported and Questionable Credit Card Charges	\$ 250,709.78

*Two personal fuel purchases totaling \$89.10 are included in the total unsupported credit card charges.

3. DAVIS HOUSE CHILD ADVOCACY CENTER OFFICIALS FAILED TO RETAIN DOCUMENTATION OF A \$1,039.60 CASH REWARD FROM CREDIT CARD #1

In December 2021, a \$1,039.60 cash reward certificate was redeemed from Credit Card #1. DHCAC officials could not provide documentation of how this money was used. Due to the lack of records, it is unclear how this money was used or whether it was used for the benefit of DHCAC.

INTERNAL CONTROL AND COMPLIANCE DEFICIENCIES

Our investigation revealed the following deficiencies in internal control and compliance:

Deficiency 1: The DHCAC Board of Directors failed to provide oversight of spending

The DHCAC Board of Directors failed to implement controls and processes to ensure that disbursements were necessary and reasonable business expenses. The former DHCAC treasurer stated to investigators that he did not have access to the credit card statements and only saw the transactions once recorded in DHCAC's accounting records.

Investigators noted that DHCAC's general ledger included several comments questioning the purpose of certain payments from DHCAC's bank accounts (**Refer to Exhibit 7**).

Exhibit 7

Date	Memo/Description	Amount
02/06/2023	Check # 4775 - What is this Reimbursement for?	-296.88
02/27/2023	Check # 4783 - Need to know what the reimbursement is for	-100.00
03/01/2023	Check # 4785 - What is this for?	-169.26
04/03/2023	Check 4797 - Cash - what was this for?	-250.00
04/11/2023	Check # 4800 - What is the reimbursement for	-144.18
04/14/2023	Check # 4805 - Who/what is this for?	-464.69
04/17/2023	Check # 4804 - What was the reimbursement for?	-492.84
04/17/2023	Check # 4808 - What is the reimbursement for?	-54.84
04/18/2023	Check # 4809 - What is the reimbursement for?	-88.84

An excerpt from the DHCAC's 2022-2023 general ledger included comments questioning the purpose of transactions

Deficiency 2: DHCAC officials did not comply with their own *Personnel Policies and Procedures*

DHCAC's *Personnel Policies and Procedures*, revised in August 2020, outline processes that DHCAC personnel should follow for compliance, consistency, and accountability purposes. Our investigation found that DHCAC officials failed to comply with their own *Personnel Policies and Procedures* in several ways.

- A. Paragraph "N. *Travel Policies and Reimbursement Procedures*" outlines per diem reimbursement processes for DHCAC for personnel traveling for various events. Sub-paragraph "5. *Meals/Tips*" states that meals and per diems will be reimbursed at the current reimbursement rate of the government as currently reflected by the rates listed by the U.S. General Services Administration based on location.

DHCAC officials told investigators that this policy was routinely not followed. Instead, DHCAC credit cards were used to purchase employee meals instead of paying per diem reimbursements.

- B. Paragraph “K. *Record Retention*” outlines DHCAC's minimum document retention requirements for different types of documents. For example, the policy states that vendor invoices must be retained for at least seven years and that bank statements must be retained for at least three years.

The former executive director told investigators that DHCAC maintained the records at the time of his resignation, and he did not know what happened to the records after he resigned. Investigators determined that some records from his tenure were missing, but could not determine what happened to them or when they went missing. The current executive director stated that since beginning her role in April 2023, DHCAC has worked extensively with its accountants to maintain records and documentation. However, DHCAC could not provide investigators with supporting documentation for the \$86,594.63 credit card charges.

By failing to maintain supporting documentation, DHCAC officials created a lack of financial transparency and increased the risk of unauthorized use of DHCAC funds.

Maintaining adequate supporting documentation is a minimum accounting requirement for accountability purposes and helps ensure that the funds are used only for authorized purposes.

Deficiency 3: DHCAC failed to establish and implement an adequate policy addressing the proper use of credit cards

DHCAC officials failed to establish and implement an adequate policy to ensure proper credit card use. The investigation found that DHCAC credit cards were used for unnecessary, questionable, and personal expenses. The paragraph below is the only language in DHCAC’s *Personnel Policies and Procedures* addressing the use of credit cards (**Refer to Exhibit 8**).

Exhibit 8

M. Credit Cards
The Executive Director maintains a credit card for agency use. He or She may grant other staff use of the card upon request for an agency related purchase.

DHCAC’s Personnel Policies and Procedures addressing the use of credit cards

An adequate credit card policy would provide stronger internal controls over DHCAC's finances, ensuring that the entity spends money only on necessary and reasonable business expenses while minimizing the risk of fraud, waste, and abuse.

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