TENNESSEE COMPTROLLER OF THE TREASURY

COMPTROLLER'S INVESTIGATIVE REPORT

Bel-Aire Elementary School PTO

November 16, 2026

Jason E. Mumpower
Comptroller of the Treasury

DIVISION OF INVESTIGATIONS

TENNESSEE COMPTROLLER OF THE TREASURY

JASON E. MUMPOWER
Comptroller

November 16, 2026

Tullahoma City Schools Board of Education
510 South Jackson Street
Tullahoma, TN 37388

Tullahoma City Schools Board of Education Officials:

The Office of the Comptroller of the Treasury conducted an investigation of selected records of the Bel-Aire Elementary School PTO, 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 14th 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,

Jason E. Mumpower
Comptroller of the Treasury

JEM/MLC

INVESTIGATIVE REPORT

Bel-Aire Elementary School PTO

The Office of the Comptroller of the Treasury investigated allegations of malfeasance related to the Bel-Aire Elementary School PTO. The investigation was initiated after Tullahoma City School District officials reported discrepancies involving the PTO president. The investigation was limited to selected records for the period August 7, 2023, through January 29, 2026. The results of the investigation were communicated with the Office of the District Attorney General of the 14th Judicial District.

-BACKGROUND



The Bel-Aire Elementary School (school), located in Tullahoma, Tennessee, serves students in kindergarten through fifth grade and is part of the Tullahoma City School District (district).

The Bel-Aire Elementary School PTO (PTO) is a district-approved school support organization (SSO) that provides communication and support to Bel-Aire Elementary School parents, teachers, students, administrators, and the surrounding community. The PTO holds fundraisers and accepts donations to support its mission.

PTO bylaws stipulate that the organization is governed by a board consisting of elected officers, including a president, vice president, secretary, and treasurer. However, due to a vacant treasurer position during the investigative period, the president also assumed the duties pertaining to receiving and disbursing PTO funds, maintaining the PTO bank account, and preparing financial statements. Samantha Zimmerman served as the PTO's president from approximately August 7, 2023, until her resignation on January 29, 2026.

The School Support Organization Financial Accountability Act, codified in Tenn. Code Ann. §49-2-601 *et seq.*, provides that officers are required to ensure the funds and property of their organization are safeguarded and used only for purposes related to the goals and objectives of the organization. To assist such officers in discharging their duties, the Comptroller, pursuant to Tenn. Code Ann. § 49-

2-610, published the *Model Financial Policy for School Support Organizations (Model Financial Policy)*, which prescribes a set of accounting controls to ensure the funds are used to further the organization's goals and objectives. The *Model Financial Policy* prescribes the minimum financial accountability controls that officers must follow. Additionally, the Tullahoma City Board of Education published a school support organization policy with expanded district-specific requirements.

RESULTS OF INVESTIGATION

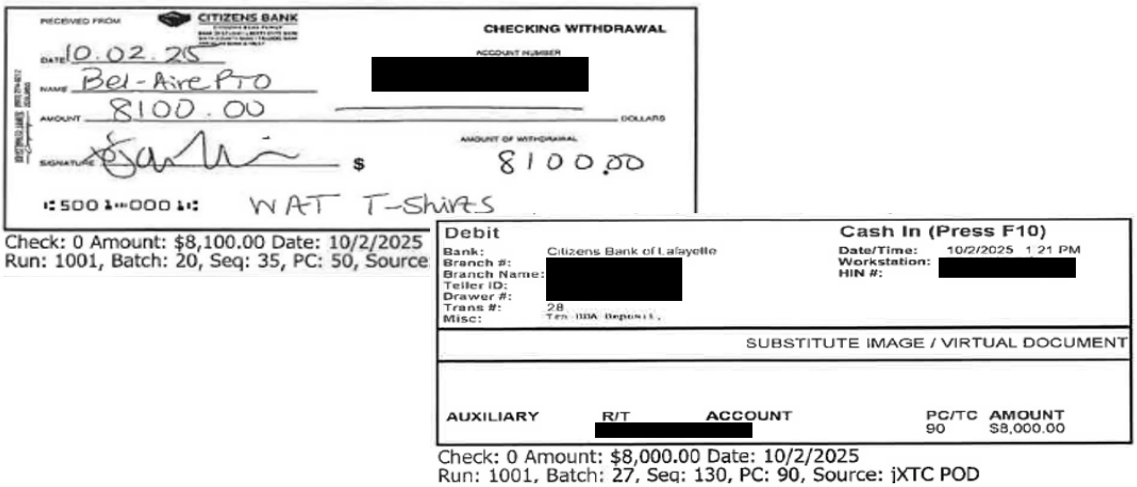
1. FORMER BEL-AIRE ELEMENTARY SCHOOL PTO PRESIDENT SAMANTHA ZIMMERMAN MISAPPROPRIATED FUNDS TOTALING AT LEAST $57,522.62

Former PTO President, Samantha Zimmerman, misappropriated funds totaling at least $57,522.62, as follows:

A. Zimmerman misappropriated at least $31,820.49 by making personal cash withdrawals from the PTO bank account

The PTO conducted numerous fundraising events throughout each school year, and Zimmerman often made cash withdrawals from the PTO bank account for start-up cash at these events. However, investigators determined that Zimmerman deposited at least $20,900 of total cash withdrawals in her personal bank accounts. The exhibit below reflects a PTO cash withdrawal from October 2, 2025, that was deposited into Zimmerman's personal account on the same day **(Refer to Exhibit 1)**. Zimmerman told investigators that some withdrawals were unrelated to PTO operations and were for personal use. A review of the fundraising event dates indicated that the remaining balance of $10,920.49 was withdrawn from the PTO bank account without proper justification.

Exhibit 1



Zimmerman withdrew cash from the PTO account (top) and deposited it into a personal account (bottom)

B. Zimmerman misappropriated at least $21,215.86 by making personal disbursements from the PTO bank account

The PTO used manual checks for some disbursements, but most were made with the three debit cards associated with the PTO bank account. The president, vice president, and secretary were each assigned a debit card with a unique card number. Investigators determined that Zimmerman used her assigned debit card to make personal disbursements, including but not limited to entertainment, household items, food and drink, clothing, vehicle maintenance, and multiple storage unit leases. The exhibit below shows three of the six storage units leased by Zimmerman with PTO funds. The PTO used the center unit (322), but the five remaining units were for Zimmerman's personal use **(Refer to Exhibit 2)**.

Exhibit 2



Three of the six storage units leased by Zimmerman with PTO funds

C. Zimmerman misappropriated at least $4,486.27 by diverting PTO collections

Zimmerman was responsible for receiving, depositing, and accounting for all PTO collections received by cash, check, or Venmo, a mobile payment service. Investigators determined that Zimmerman diverted PTO collections as described below:

i. Investigators determined that at least $2,841.67 in proceeds from a PTO fundraiser were not deposited into the PTO bank account. The fundraiser was conducted from March 26, 2025, through April 11, 2025. Zimmerman reported proceeds of at least $4,224.26 for this fundraiser, but investigators determined that only $1,382.59 was deposited into the PTO bank account, resulting in $2,841.67 ($4,224.26 less $1,382.59) not being deposited into the PTO bank account.

ii. Investigators determined that at least $1,644.60 in PTO collections received through Venmo were not deposited into the PTO bank account. During the investigative period,

Zimmerman used multiple personal Venmo accounts to collect PTO funds for various fundraising events, including a walk-a-thon and spirit-wear sales.

Due to the lack of supporting documentation for the remaining PTO collections, investigators were unable to determine the source(s) of collections or if all collections were properly deposited.

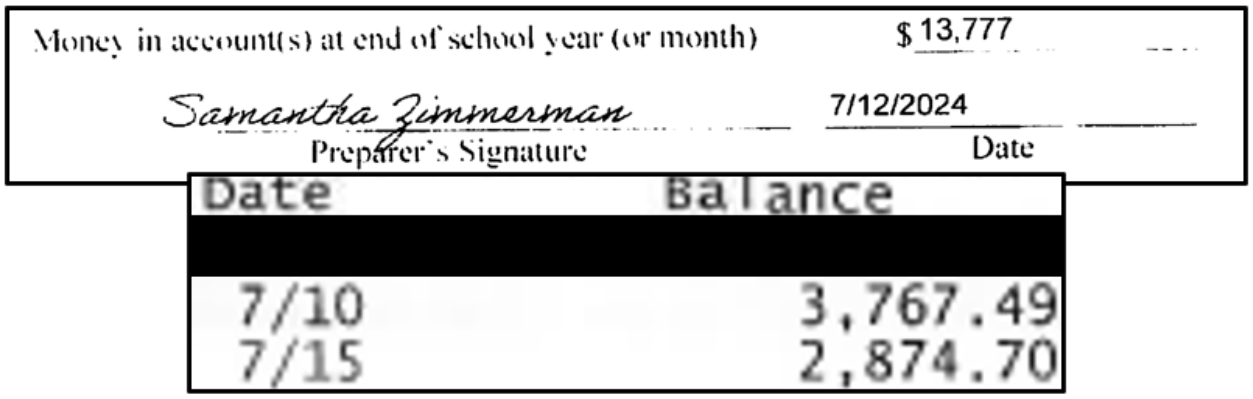
During the investigative period, misappropriated funds totaled at least $57,522.62. An analysis of Zimmerman's bank accounts identified total repayments of $20,000, resulting in a total misappropriation unrecovered of $37,522.62. Of the $20,000 repayments made, investigators confirmed that Zimmerman repaid $11,000 of the misappropriated funds after she learned of the ongoing investigation.

Summary of Misappropriation by Zimmerman	
Personal Cash Withdrawals	$ 31,820.49
Personal Disbursements	21,215.86
Diverted PTO Collections	4,486.27
Total Misappropriation	$ 57,522.62
Repayment by Zimmerman	-20,000.00
Total Misappropriation Unrecovered	$ 37,522.62

2. ZIMMERMAN FALSELY REPORTED THE PTO'S BANK BALANCE TO BEL-AIRE ELEMENTARY SCHOOL OFFICIALS

Zimmerman submitted annual financial reports to school officials that falsely reported the PTO's bank balance. PTO bylaws required that an SSO annual financial report be submitted to school officials at the end of each school year, outlining the objectives and activities completed during the school year, as well as the beginning bank account balance, money collected and disbursed during the year, and the bank account balance at year end. Zimmerman prepared and submitted two of these reports to school officials while serving as president during the 2023-2024 and 2024-2025 school years. On July 12, 2024, the 2023-24 report was submitted, reflecting an ending balance in the PTO bank account of $13,777, when the actual bank balance was $3,767.49 on July 10, 2024, and $2,874.70 on July 15, 2024 **(Refer to Exhibit 3)**.

Exhibit 3


Money in account(s) at end of school year (or month) $ 13,777

Samantha Zimmerman — Preparer's Signature

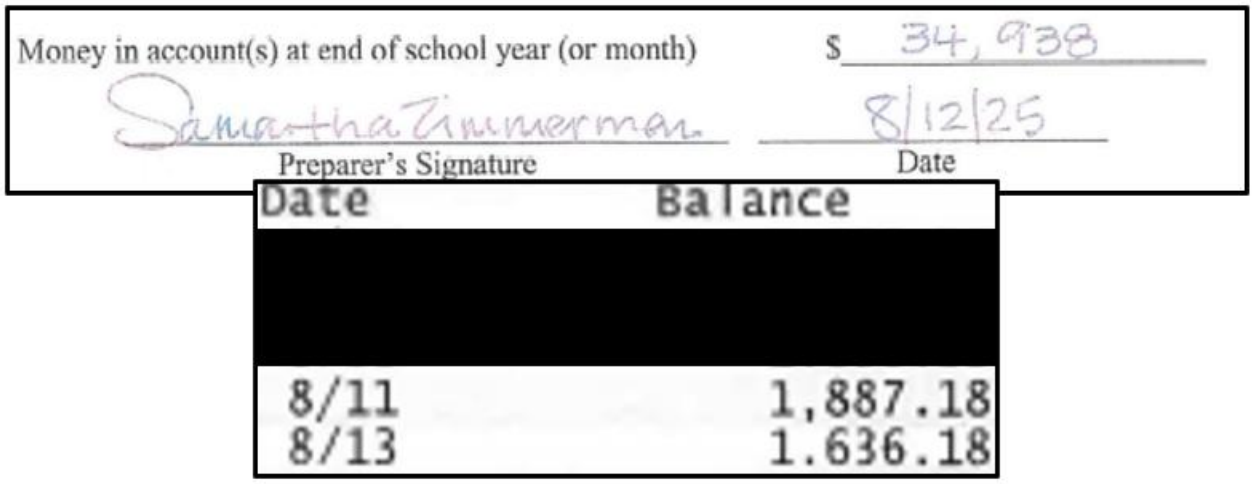
7/12/2024 — Date

Date	Balance
[redacted]	
7/10	3,767.49
7/15	2,874.70

Submitted SSO Annual Financial Report (top), daily balance of two days from PTO's bank statements (bottom)

On August 12, 2025, the 2024-25 report was submitted, reflecting an ending balance in the PTO bank account of $34,938, when the actual bank balance was $1,887.18 on August 11, 2025, and $1,636.18 on August 13, 2025 **(Refer to Exhibit 4).**

Exhibit 4


Money in account(s) at end of school year (or month) $ 34,938

Samantha Zimmerman — Preparer's Signature

8/12/25 — Date

Date	Balance
[redacted]	
8/11	1,887.18
8/13	1.636.18

Submitted SSO Annual Financial Report (top), daily balance of two days from PTO's bank statements (bottom)

3. THE PTO HAD QUESTIONABLE DISBURSEMENTS TOTALING AT LEAST $77,307.96

In addition to the misappropriation noted above, investigators identified at least $77,307.96 in questionable disbursements from the PTO bank account. The PTO did not maintain adequate supporting documentation, such as itemized receipts and invoices, to substantiate these disbursements. Therefore, investigators were unable to verify the legitimacy of the disbursements or determine whether they were solely for the benefit of the PTO.

On November 10, 2026, the Coffee County Grand Jury indicted SAMANTHA KAY ZIMMERMAN on one count of Theft over $10,000, two counts of Tampering with Government Records, and two counts of Forgery.

The charges and allegations contained in the indictment are merely accusations of criminal conduct, and not evidence. The defendant is presumed innocent unless and until proven guilty beyond a reasonable doubt and convicted through due process of law.

Bel-Aire Elementary School PTO Investigation Exhibit

INTERNAL CONTROL AND COMPLIANCE DEFICIENCIES

Our investigation revealed deficiencies in internal control and compliance, which contributed to Zimmerman's ability to misappropriate PTO funds without prompt detection. These deficiencies included:

Deficiency 1: PTO officers failed to properly safeguard and maintain accurate financial records

PTO officers did not retain or provide investigators with adequate supporting documentation for collections and disbursements. As a result, investigators could not determine if collections were accurate, whether all collections were deposited, or confirm if disbursements were for legitimate PTO purposes.

According to the *Model Financial Policy*, "All collection and disbursement records, bank statements, imaged checks, receipts/invoices for disbursements…shall be organized and maintained by the treasurer or bookkeeper by fiscal year. These records must be maintained for at least four years." The lack of financial records increases the risk that fraud, waste, and abuse will occur without prompt detection.

Deficiency 2: PTO officers failed to adequately separate financial duties

PTO officers failed to adequately separate financial duties. Because the former president also performed the respective duties of the treasurer, the president was solely responsible for depositing funds, making disbursements, and performing bank reconciliations. The *Model Financial Policy* states, "No one person within the SSO shall be in control of a transaction from inception to recording". Allowing one individual exclusive control over all financial duties increases the risk of fraud without prompt detection.

PTO officers indicated that they have corrected or intend to correct these deficiencies.