

SABINE PARISH POLICE JURY



INVESTIGATIVE AUDIT  
ISSUED MARCH 23, 2016

**LOUISIANA LEGISLATIVE AUDITOR  
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LOUISIANA LEGISLATIVE AUDITOR  
DARYL G. PURPERA, CPA, CFE

March 23, 2016

**THE HONORABLE KENNETH M. EBARB, PRESIDENT,  
AND MEMBERS OF THE  
SABINE PARISH POLICE JURY**  
Many, Louisiana

We have audited certain transactions of the Sabine Parish Police Jury. Our audit was conducted in accordance with Title 24 of the Louisiana Revised Statutes to determine the validity of allegations we received.

Our audit consisted primarily of inquiries and the examination of selected financial records and other documentation. The scope of our audit was significantly less than that required by *Government Auditing Standards*.

The accompanying report presents our findings and recommendations as well as management's response. This is a public report. Copies of this report have been delivered to the District Attorney for the 11<sup>th</sup> Judicial District of Louisiana and others as required by law.

Respectfully submitted,

Daryl G. Purpera, CPA, CFE  
Legislative Auditor

DGP/aa

SPPJ16



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## EXECUTIVE SUMMARY

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### **Parish Transportation Fund Violations**

Individual members of the Sabine Parish Police Jury (SPPJ) directed road maintenance work without (1) obtaining the approval of the parish governing authority and involving the parish road manager and (2) following state bid law and SPPJ public works procedures, which may violate state law. In addition, SPPJ used public funds to maintain private driveways and roads, which also may violate the state constitution and state law.

#### Individual Police Jurors Directed Road Maintenance Work

SPPJ Jurors Randy Byrd and Ricky Sepulvado directed road maintenance work totaling \$378,682 without (1) obtaining the approval of the parish governing authority and involving the parish road manager as required by the PTA, or (2) following state bid law or SPPJ public works procedures. By directing maintenance work on roads in their respective districts without obtaining the parish governing authority's approval, involving the parish road manager, or following state bid law and SPPJ public works procedures, Mr. Byrd and Mr. Sepulvado may have violated state law.

#### Public Funds Were Used to Maintain Private Driveways and Roads

SPPJ performed road maintenance on what appear to be private driveways and roads. SPPJ records also indicate that 94 roads were maintained by SPPJ road maintenance employees that were not included on the SPPJ-approved road list. By performing work on private property, SPPJ may have violated state law and the state constitution.





## BACKGROUND AND METHODOLOGY

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Sabine Parish (Parish) is located in northwest Louisiana and has a population of 24,233 (2010 Census). The Parish is governed by the Sabine Parish Police Jury (SPPJ), which is comprised of nine jurors representing the various Parish districts. SPPJ has various powers [specified by Louisiana Revised Statute (La. R.S.) 33:1236, *et seq.*], including the ability to regulate the construction and maintenance of roads and bridges throughout the Parish.

In 2015, SPPJ received \$348,585 from the Parish Transportation Fund (PTF), plus the ad valorem taxes collected to fund road construction in its respective districts. The Parish Transportation Act (PTA) (R.S. 48:751, *et seq.*) requires road improvement projects funded by the PTF to be included in the parish-wide capital improvement program and centrally administered by SPPJ. Attorney General *Opinion 96-189* provides that projects funded with purely local tax revenue do not fall under the restrictions of the PTF unless local tax revenues are commingled with the PTF. It further states “The commingling of local tax revenues with PTF monies subjects the local funds to the same use restrictions applicable to PTF funds....”

The Louisiana Legislative Auditor received complaints concerning certain transactions involving SPPJ road department activities and funds. This audit was initiated to determine the validity of those complaints. The procedures performed during this audit included:

- (1) interviewing SPPJ employees and other persons, as appropriate;
- (2) examining selected SPPJ documents and records;
- (3) inspecting roads being maintained by SPPJ;
- (4) gathering and examining external parties’ documents and records; and
- (5) reviewing applicable state laws and regulations.



## FINDING AND RECOMMENDATIONS

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### Parish Transportation Fund Violations

**Individual members of the Sabine Parish Police Jury (SPPJ) directed road maintenance work without (1) obtaining the approval of the parish governing authority and involving the parish road manager and (2) following state bid law and SPPJ public works procedures, which may violate state law.<sup>1,2,3</sup> In addition, SPPJ used public funds to maintain private driveways and roads, which also may violate the state constitution and state law.<sup>4</sup>**

La. R.S. 48:751, *et seq.* (the Parish Transportation Act, or PTA) created the Parish Transportation Fund (PTF) to provide funds for parish governments to construct and maintain parish roads. La. R.S. 48:755 mandates parishes to: (1) adopt a system of road administration requiring the governing authority's approval for any PTF expenditures; (2) develop a three-year capital improvement program listing all projects that have been approved by the parish governing authority; and (3) construct roads based upon engineering plans and inspection. La. R.S. 48:753(F) defines a "public road" as a road that "serves a public purpose that is in the best interest of the parish or municipality and their respective road systems."

La. R.S. 48:755(A) expressly prohibits a member of a governing authority from expending "any funds in his ward or district without the approval of the parish governing authority." Rather, La. R.S. 48:755(B)(2) requires that funds appropriated to each parish be used for the benefit of the parish as a whole and within the priority ranking for the parish. La. R.S. 48:755 (C) requires that the parishwide selective maintenance program, prepared and administered by the parish road manager, provide for a schedule of the work to be performed by category, on a weekly basis. The parish road manager may authorize maintenance work not contained in the weekly schedule upon receipt of constructive notice of a defect in the parish road system and when, in the opinion of the parish road manager, the defect constitutes a hazard to public safety. Attorney General *Opinion 08-0236* provides that purely local funds are excluded from the requirements of La. R.S. 48:755; however, according to the SPPJ's Secretary-Treasurer, SPPJ pools all of its road-related revenue into one parish-wide fund. Because the funds were commingled, the requirements of La. R.S. 48:755 should apply to all SPPJ road work in accordance with Attorney General *Opinion 96-189*.

### Individual Police Jurors Directed Road Maintenance Work

SPPJ Jurors Randy Byrd and Ricky Sepulvado directed road maintenance work totaling \$378,682 without (1) obtaining the approval of the parish governing authority and involving the parish road manager as required by the PTA,<sup>1</sup> or (2) following state bid law<sup>3</sup> or SPPJ public works procedures. By directing maintenance work on roads in their respective districts without obtaining the parish governing authority's approval, involving the parish road manager, or following state bid law and SPPJ public works procedures, Mr. Byrd and Mr. Sepulvado may have violated state law.<sup>1,2,3</sup>

According to SPPJ records and statements from SPPJ management and police jurors with whom we spoke, Mr. Byrd and Mr. Sepulvado initiated and oversaw road maintenance work totaling \$378,682 from July 29, 2015 through September 4, 2015, without obtaining parish governing authority approval, involving the SPPJ road manager or following state bid law or SPPJ public works procedures. The maintenance needed on these roads was routinely handled by the SPPJ road manager through approved vendor contracts. According to Mr. Byrd and Mr. Sepulvado, they discussed road repairs with SPPJ Road Manager Tommy Patton on several occasions, but he did not perform any repairs and was not responsive to their requests. Mr. Patton denied this, saying that he was never approached about the condition of the roads in question and did not find out about the first project until the work was in progress.

According to Mr. Bryd and Mr. Sepulvado, they waited for more than a year then decided to perform the maintenance on their own outside of SPPJ's normal process. Mr. Byrd contacted a contractor (on his and Mr. Sepulvado's behalf), received quotes from one contractor, directed the work to be done, and instructed the contractor to send the invoices to SPPJ. Mr. Byrd and Mr. Sepulvado both acknowledged that they were aware of SPPJ's process by which road maintenance was handled (i.e., that work is initiated by Mr. Patton via purchase order after obtaining the parish governing authority's approval) but decided to initiate the road work themselves because Mr. Patton was not responsive to the needs of their districts.

Mr. Byrd and Mr. Sepulvado further stated that after speaking with then SPPJ Secretary Treasurer Ronald Busby, they understood that it would be appropriate for them to initiate the maintenance work as long as the project stayed below the state bid law<sup>3</sup> threshold. Mr. Busby told us that he discussed general bid procedures conducted by SPPJ but never told Mr. Byrd and Mr. Sepulvado that they could direct road maintenance work. According to Mr. Busby, he told Mr. Byrd and Mr. Sepulvado that state law<sup>3</sup> requires public works projects in excess of \$150,000 to be bid out. However, SPPJ records show that one of the projects initiated by Mr. Byrd and Mr. Sepulvado totaled \$268,830.<sup>A</sup>

After finding out about the road maintenance work, Mr. Patton and Mr. Busby told us they met with Mr. Byrd and Mr. Sepulvado to tell them that they did not have the authority to initiate road maintenance work without the parish governing authority's approval and the road manager's involvement. At this meeting, Mr. Patton and Mr. Busby learned that Mr. Byrd and Mr. Sepulvado had initiated yet another road project. Mr. Patton indicated that he signed the associated purchase requisition for the new project because he felt obligated to do so. Mr. Patton said that Mr. Byrd improperly initiated two additional projects without Mr. Patton's involvement and the parish governing authority's approval after this meeting.

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<sup>A</sup> This project was split into three parts (based on the road where the work was done) and quoted and invoiced separately by the same contractor. However, the work performed on all three roads was identical, the invoices were prepared on the same day, and the quotes were prepared within a week of each other.

### Public Funds Were Used to Maintain Private Driveways and Roads

SPPJ performed road maintenance on what appear to be private driveways and roads. SPPJ records also indicate that 94 roads were maintained by SPPJ road maintenance employees that were not included on the SPPJ-approved road list. By performing work on private property, SPPJ may have violated state law<sup>1</sup> and the state constitution.<sup>4</sup>

While viewing roads in the parish road system, we observed several roads that appear to be private driveways or roads. In some cases, these “roads” serve only one residence. Others go through posted land, are blocked by the landowner, or dead-end at carports. SPPJ does not maintain ownership records related to any roads. None of the police jurors we spoke with could cite any benefit to the parish as a whole in maintaining roads that serve only one residence. The jurors with whom we spoke agreed that the only ones to benefit from the parish maintaining such roads are the residents who live on them, not the public at large.

The cost of maintaining these private driveways and roads could not be determined because the SPPJ road department work tracking system does not include externally contracted costs or some internal costs for work performed by police jury employees. However, we found at least \$22,070 of public funds had been spent for repair and maintenance work on what appears to be private driveways and roads. According to Attorney General *Opinion 00-0149*, with regard to streets and lanes that are private in nature, “the use of Parish labor, equipment and/or materials to maintain same is clearly prohibited by Article VII, Section 14.” As such, any funds spent on the maintenance and/or repairing private driveways or roads that serve no public purpose may be a prohibited donation of public funds and a violation of the state Constitution.<sup>4</sup>



**Image 1**

The road in Image 1 above was listed in SPPJ's road department work tracking system as a road maintained by SPPJ but was not included on the SPPJ-approved road list. As is visible in Image 1, the road was blocked at the time of our audit.

In addition, SPPJ purchased and installed culverts totaling \$375 on land owned or leased by a Native American tribe (tribal land). Although invoices indicate that three culverts were purchased and installed on a public road (Gene Knight Road), these culverts were installed elsewhere. According to the parish road foreman for this area, the culverts were installed on a private road on tribal land that may have been part of Gene Knight Road in the past but was not now. Police Juror Eric Garcie said he was contacted by the tribe's chairman to perform the work and he contacted Mr. Patton to request the work be performed.

SPPJ records also include purchase orders and invoices totaling \$23,670 for materials and labor related to laying 246 tons of hot mix (asphalt) on tribal land. These invoices were submitted by two vendors. One vendor later informed SPPJ that the invoice was no longer due because he decided to donate the services. The second vendor subsequently modified his invoice, making it due from the tribe instead of SPPJ.

Then-Assistant Secretary Treasurer William Weatherford sent a letter to the second vendor requesting a credit in December 2015 and notifying him that the District Attorney advised SPPJ not to pay the invoice. In January 2016, Mr. Garcie received a letter from this



vendor stating that the tribe had paid a portion of the invoice, and SPPJ and Mr. Garcie would not be held responsible for the unpaid balance. According to Mr. Garcie, there was a miscommunication between SPPJ and the vendor, and the amount was actually due from the tribe the whole time. Mr. Garcie initially stated that there was a cooperative endeavor agreement between the tribe and SPPJ but was only able to provide us with a letter from the tribe requesting help with a paved walking track. Neither Mr. Garcie nor SPPJ were able to provide us with an approved cooperative endeavor agreement.

SPPJ records revealed 94 roads that were in the road department's work tracking system but not on the SPPJ-approved road list. Since the road department has these roads in their tracking system, the roads probably are maintained by SPPJ using public funds. However, they do not appear to be owned, or approved, by SPPJ. We were told that the SPPJ-approved road list (which SPPJ refers to as its "fixed asset listing") is used to record all roads that have been inspected and approved by the SPPJ Planning Commission and Parish Engineer in accordance with the Parish's *Policy and Procedures for Acceptance of Roads into Parish Road System*. Despite the policy, current SPPJ road maintenance procedures do not require verification that a road is on the SPPJ-approved road list prior to performing work on a road.

According to the road department's secretary, if a road crew reports they worked on a road that is not listed in the road department's tracking system, she adds the road to the system. She does not request or obtain any records from SPPJ to determine if the roads should be worked on or if they are on the SPPJ-approved road list. Seventy-two of these 94 roads (77%) are located in SPPJ Ward 5, Police Juror Eric Garcie's area. Mr. Garcie stated that he did not know why so many of these roads were in his district and that he has never asked the road department to work on non-parish roads. Because these roads were not properly accepted into the parish road system, they may be private roads. According to Attorney General *Opinion 00-0149*, with regard to private streets and lanes, "the use of Parish labor, equipment and/or materials to maintain same is clearly prohibited by Article VII, Section 14." As such, any funds spent on the maintenance and/or repairing of these roads may be a prohibited donation of public funds and a violation of the state Constitution.<sup>4</sup>

Since SPPJ did not keep records of how long the roads were maintained by the road department, they could not demonstrate if the roads would be considered public by state law.<sup>5</sup> La. R.S. 48:491 provides that all roads and streets in this state which have been or hereafter are kept up, maintained, or worked for a period of three years by the authority of a parish governing authority within its parish shall be public roads or streets. SPPJ should obtain legal guidance to determine the effect of this law on roads currently in the road department's work tracking system that are not on the SPPJ-approved road list and to address how the Parish should address the maintenance of these roads in the future.

### **Recommendations**

We recommend that SPPJ management consult with legal counsel regarding the proper treatment of roads maintained, but not approved by SPPJ. SPPJ should also adopt policies and procedures to ensure that public funds are spent in accordance with state law. These policies and procedures should:

- (1) restrict entries into the road work tracking system to only parish roads;
- (2) require the appropriate documentation and approvals prior to roads being added to the road tracking system;
- (3) regularly reconcile the road work tracking system with the SPPJ-approved road list;
- (4) verify that roads are on the SPPJ-approved road list before commencing work on those roads;
- (5) implement a work order system for road work;
- (6) compile comprehensive road and job cost data (internal and external expenses);
- (7) require that police jurors undergo PTA-related training;
- (8) ensure that individual police jurors do not authorize road improvements in the police juror's district; and
- (9) prohibit road maintenance crews from working on privately-owned or tribal property.



## LEGAL PROVISIONS

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<sup>1</sup> **Louisiana Revised Statutes (La. R.S.) 48:755** states, in part, “(A) unless otherwise provided by law, parishes shall adopt a system of road administration which shall require approval of the governing authority for any expenditures made out of this fund, and no member of the governing authority shall expend any funds in his ward or district without the approval of the parish governing authority. Each parish shall adopt a parishwide system of administration inclusive of parish roads within municipalities which shall include the development of a capital improvement program on a selective basis, centralized purchasing of equipment and supplies, centralized accounting, and selective maintenance and construction. All construction shall be based upon engineering plans and inspection. B. (1) The parishwide capital improvement program shall list all projects to be constructed during the fiscal year. Each parish shall undertake a continuing study of the needs of the various parish roads for the purpose of bringing existing roads up to current standards or for replacement of existing roads where required and shall keep the information so developed up to date through a continuing annual needs study. Each parish shall develop a parishwide program of construction inclusive of parish roads within municipalities to be commenced the ensuing fiscal year which shall be based upon the anticipated revenues to be appropriated by the legislature and listed in a prioritized ranking based on parishwide needs inclusive of parish roads within municipalities and shall include overlay projects. The program shall also list the projects which may reasonably be anticipated to be constructed in the following two years. All projects listed for the total three-year program shall be approved by the parish governing authority. The capital improvement program shall be adopted by the parish governing authority prior to the beginning of the first year of the three-year plan. The program shall be adopted annually regardless of whether the parish governing authority anticipates capital improvements in the first year of the plan. (2) The funds appropriated to each parish shall be used for the benefit of the parish as a whole and within the priority ranking for the parish. The most critical needs existing parishwide according to the priority ranking shall be met first. Funds shall not be expended in the parish until the parish has complied with the provisions of this Part. (C) The parishwide selective maintenance program inclusive of parish roads within municipalities shall provide for a schedule of the work to be performed by category, on a weekly basis. The program shall be prepared and administered by the parish road manager. The parish road manager may authorize maintenance work not contained in the weekly schedule upon receipt of constructive notice of a defect in the parish road system and when, in the opinion of the parish road manager, the defect constitutes a hazard to public safety. The parish road manager shall maintain a record of the work so authorized and shall report the total amount of such expenditures on a monthly basis to the parish governing authority.”

<sup>2</sup> **La. R.S. 14:134** states, in part, “(A) Malfeasance in office is committed when any public officer or public employee shall: (1) Intentionally refuse or fail to perform any duty lawfully required of him, as such officer or employee; or (2) Intentionally perform any such duty in an unlawful manner; or (3) Knowingly permit any other public officer or public employee, under his authority, to intentionally refuse or fail to perform any duty lawfully required of him, or to perform any such duty in an unlawful manner.”

**La. R.S. 48:762** provides, “Any person who knowingly uses or causes the use of parish transportation funds for purposes not authorized by this Part shall be subject to prosecution under the provisions of R.S. 14:134 *et seq.* In addition to this criminal penalty, the parish governing authority shall have a right of action against the person to recover in a civil action the amount of the funds which were so misused.”

<sup>3</sup> **La. R.S. 38:2212(A)(1)** states, in part, “All public work exceeding the contract limit as defined in this Section, including labor and materials, to be done by a public entity shall be advertised and let by contract to the lowest responsible and responsive bidder who had bid according to the bidding documents as advertised, and no such public work shall be done except as provided in this Part.”

**La. R.S. 38:2212(C)(1)** states, in part, “Except as provided in Paragraphs (2) and (3) of this Subsection, the term “contract limit” as used herein shall be equal to the sum of one hundred fifty thousand dollars per project...”

<sup>4</sup> **Louisiana Constitution Article VII, Section 14 (A)** states, in part, “Except as otherwise provided by this constitution, the funds, credit, property, or things of value of the state or of any political subdivision shall not be loaned, pledged, or donated to or for any person, association, or corporation, public or private. ”

**La. R.S. 42:1461(A)** states, “Officials, whether elected or appointed and whether compensated or not, and employees of any “public entity,” which, for purposes of this Section shall mean and include any department, division, office, board, agency, commission, or other organizational unit of any of the three branches of state government or of any parish, municipality, school board or district, court of limited jurisdiction, or other political subdivision or district, or the office of any sheriff, district attorney, coroner, or clerk of court, by the act of accepting such office or employment assume a personal obligation not to misappropriate, misapply, convert, misuse, or otherwise wrongfully take any funds, property, or other thing of value belonging to or under the custody or control of the public entity in which they hold office or are employed.”

<sup>5</sup> **La. R.S. 48:491B(1)(a)** states, “All roads and streets in this state which have been or hereafter are kept up, maintained, or worked for a period of three years by the authority of a parish governing authority within its parish, or by the authority of a municipal governing authority within its municipality, shall be public roads or streets, as the case may be, if there is actual or constructive knowledge of such work by adjoining landowners exercising reasonable concern over their property.”

## APPENDIX A

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### Management's Response



Kenneth M. Ebarb  
President

Ronald Bison  
Vice-President

William E. Weatherford  
Secretary Treasurer

OFFICE OF  
**SABINE PARISH POLICE JURY**

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Willes Funderburk  
708 HWY 118  
Florien, LA 71429  
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DISTRICT TWO  
Mike McCormic  
414 Skylark Ln.  
Many, LA 71449  
Res. (318) 590-0517  
Cell (832) 316-5131

DISTRICT THREE  
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March 14, 2016

Mr. Daryl G. Purpera, CPA, CFE  
Louisiana Legislative Auditor  
P. O. Box 94397  
Baton Rouge, LA 70804-9397

Dear Mr. Purpera:

We, the Police Jurors of Sabine Parish, would like to express our sincere appreciation for the courtesy and professionalism exhibited by your staff during the recent investigative audit. They were most helpful and we have already incorporated many of their suggestions into our policies and procedures. Our responses to the findings included in your report are as follows:

**1. Individual Police Jurors Directed Road Maintenance Work.**

The Sabine Parish Police Jury concurs that police jurors Randy Byrd and Ricky Sepulvado directed road maintenance work totaling \$378,682 without involving the parish road superintendent as required by the Parish Transportation Act. We also agree that this work was not properly advertised for public bid as required by La. R.S. 38:2212(A)(1). Furthermore, their actions were not in accordance with the Sabine Parish Police Jury's established public works procedures.

We believe that the parish governing authority approved the maintenance of the roads in question through the normal budgetary process. \$352,000 was approved for expenditure for road maintenance in Ward 10 and \$452,500 was approved by the parish governing authority for road maintenance in Ward 7. The projects in question did not cause the total annual expenditures for road maintenance to exceed the related annual budgeted appropriations.

Mr. Byrd and Mr. Sepulvado were newly elected police jurors at the time these infractions occurred and they had not been adequately instructed by formal training in the requirements of the Parish Transportation Act or the Public Bid Law. As noted in your finding, after becoming frustrated with the lack of progress on improvements to certain roads, they discussed the matter with Secretary/Treasurer Ronald Busby to determine what they could do to get the required work done. Clearly there was a misunderstanding of what actions were allowable and what actions were prohibited.



March 14, 2016

Mr. Daryl G. Purpera, CPA, CFE

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On January 20, 2016, all members of the Sabine Parish Police Jury attended an in-service educational session provided by District Attorney Don Burkett which included discussion of the requirements of the Parish Transportation Act and Public Bid Law. It is our goal to provide adequate professional training and guidance to all police jurors so that possible violations of law will be avoided in the future. To achieve that goal, the District Attorney will be requested to provide in-service training to the Police Jury annually, each January.

## **2. Public Funds Were Used to Maintain Private Driveways and Roads.**

The Sabine Parish Police Jury has begun a reconciliation of the roads maintained by the Jury (as recorded by the Road Department) with the approved road list (as maintained by the Secretary/Treasurer). On January 20, 2016, the Jury removed eighteen (18) roads that were determined to no longer serve a public purpose from the approved road list.

In order to determine which roads “serve a public purpose” the Secretary/Treasurer has reviewed several Attorney General Opinions, has consulted the local District Attorney, and has directed an inquiry to the Legislative Auditor’s General Counsel. It appears that the determination of whether or not a road serves a public purpose is entirely at the sole discretion of the local police jury. La. R.S. 33:1236 empowers police juries to regulate the making and repairing of roads when, in the opinion of the police jury, such work will further the best interests of the parish and the road system.

La. R.S. 32:1(51) states; “Private road or driveway means every way or place in private ownership and used for vehicular travel by the owner and those having express or implied permission from the owner, but not by other persons”. Attorney General Opinion No.08-0334 states in part, “if you must seek landowner permission to use a driveway, it is a private driveway.” Attorney General Opinion No. 84-527 suggests that service of more than one landowner bodes in favor of classifying a driveway as public. Attorney General Opinion No. 07-0043 states in part, “most of parish roads in rural areas dead-end at some point, and whether or not the road dead-ends at a citizen’s residence, it does not warrant abandonment of a parish road that has been maintained and used by the public. Therefore, so long as the police jury believes that the maintenance of the road is in the best interests of the parish, nothing prevents them from continuing to maintain the road. The mere fact that a road dead-ends at a person’s residence does not constitute or warrant abandonment of a public road”. Further, Attorney General Opinion No. 12-0128 states in part;” whether a road is dedicated to public use (and thereby classified as public) is a question of use and not one of how many residents live on, or how many lots are located along the road. The fact that the road benefits only one family does not automatically deny its public character”.

Using the above criteria, the Sabine Parish Police Jury is currently in the process of reviewing each of the ninety-four (94) roads maintained but not included on the approved road list. The Jury will consult with legal counsel regarding the proper treatment of roads maintained but not approved.

The road included in Image 1 (Remington Road) was originally a loop. The road now consists of east and west legs which do not connect. The image portrayed in the investigative audit report is of the east leg of Remington Road which is maintained by a private hunting club. The west leg, which is maintained by the Sabine Parish Police Jury and services several residences, is not portrayed in the report.

On the advice of legal counsel, the Sabine Parish Police Jury will invoice the Native American Tribe \$375 for the culverts installed on land owned or leased by them.

### **3. Recommendations**

The Sabine Parish Police Jury will consult with legal counsel regarding the proper treatment of roads maintained but not approved by the Jury.

The Sabine Parish Police Jury offers the following responses to your recommendations:

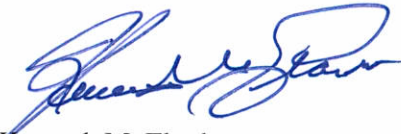
- (1) Only roads that have been approved and adopted by resolution into the parish road system will be added to the road work tracking system and be available for road maintenance entries.
- (2) A certified copy of the resolution adopting a road into the parish road system must be presented to the Road Department prior to the road being added to the road work tracking system.
- (3) The Secretary/Treasurer will reconcile the approved road list to the roads on the road work tracking system on an annual basis.
- (4) Road foremen have been instructed to verify with the Road Office that roads are on the Sabine Parish Police Jury approved road list before commencing work on those roads.
- (5) The Sabine Parish Police Jury is in the process of implementing a work order system for road work. On March 8, 2016 road department personnel participated in a demonstration of a computer program to meet the Police Jury's needs.
- (6) The new work order system will compile comprehensive road and job cost data (internal and external expenses).
- (7) On January 20, 2016, all members of the Sabine Parish Police Jury attended an in-service educational session provided by District Attorney Don Burkett which included discussion of the requirements of the Parish Transportation Act.
- (8) The District Attorney has advised all police jurors not to independently authorize road improvements in their districts.

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Mr. Daryl G. Purpera, CPA, CFE  
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(9) Maintenance crews have been reminded that they are prohibited from working on privately-owned or tribal property.

We trust that this letter is responsive to your findings and recommendations. Once again, we appreciate the work done by your staff and their recommendations which will improve the efficiency of the Police Jury's operations.

Very truly yours.



Kenneth M. Ebarb  
President  
Sabine Parish Police Jury