



Audit of the Bureau of Justice Assistance  
2020 Democratic Presidential Candidate Nominating  
Convention Grant Awarded to Milwaukee, Wisconsin



AUDIT DIVISION

22-005

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**NOVEMBER 2021**

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# EXECUTIVE SUMMARY

## **Audit of the Bureau of Justice Assistance 2020 Democratic Presidential Candidate Nominating Convention Grant Awarded to Milwaukee, Wisconsin**

### **Objectives**

The Office of Justice Programs' (OJP) Bureau of Justice Assistance (BJA) awarded the city of Milwaukee, Wisconsin, a grant totaling \$25,000,000 for security support during the 2020 Democratic National Convention. The objectives of this audit were to determine whether costs claimed under the grant were allowable, supported, and in accordance with applicable laws, regulations, guidelines, and terms and conditions of the award; and to determine whether the grantee demonstrated adequate progress towards achieving program goals and objectives.

Since 2004, Congress has awarded public funds for law enforcement activities intended to secure the presidential nominating conventions. Initial security planning for the Democratic National Convention, anticipated that approximately 50,000 delegates, elected officials, and other visitors would be in attendance. However, the COVID-19 pandemic and health measures intended to protect the public led to a less-attended convention and reduced grant expenditures.

### **Results in Brief**

We concluded that Milwaukee generally managed the Presidential Candidate Nominating Convention grant (DNC Grant) in accordance with grant requirements. We found that all tested expenditures were allowable, supported, and in accordance with applicable laws, regulations, guidelines, and the terms and conditions of the grant. Additionally, we found that Milwaukee adhered to guidance related to program performance and accomplishments, grant financial management, budget management and control, drawdowns, and federal financial reports. Our report contains no recommendations.

### **Audit Results**

The purpose of the OJP grant we reviewed was to ensure a safe and secure environment for Democratic National Convention delegates, elected officials, members of the media, and visitors. The project period for the grant was from October 2019 through June 2021, with the primary activity occurring prior to and during the August 2020 convention. Milwaukee drew down \$16,729,687 of the \$25,000,000 grant. The remaining \$8,270,313 balance is currently pending de-obligation by OJP.

#### **Program Goals and Accomplishments**

The goal of the DNC Grant was to provide a safe and secure environment for convention delegates, elected officials, other dignitaries, and media. We determined that Milwaukee accomplished the grant goal.

#### **Grant Management**

We found that Milwaukee adhered to guidance related to program performance and accomplishments, grant financial management, budget management and control, drawdowns, and federal financial reports.

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# Introduction

The U.S. Department of Justice (DOJ) Office of the Inspector General (OIG) completed an audit of the 2020 Democratic Presidential Candidate Nominating Convention grant awarded by the Office of Justice Programs (OJP) to the city of Milwaukee, Wisconsin. The 2020 Democratic Presidential Candidate Nominating Convention grant (DNC grant) was administered by the Bureau of Justice Assistance (BJA), a component of OJP, and totaled \$25 million, as shown in Table 1.

**Table 1**

**DNC Grant Awarded to Milwaukee, Wisconsin**

Award Number	Award Date	Project Period Start Date	Project Period End Date	Award Amount
2020-ZC-BX-0002	3/23/2020	10/01/2019	6/30/2021	\$25,000,000
			<b>Total:</b>	<b>\$25,000,000</b>

Source: OJP Grant Records

Since 2004, Congress has awarded public funds for law enforcement activities associated with the presidential nominating conventions. In March 2019, the Democratic National Committee selected Milwaukee to host the 2020 Democratic National Convention (DNC) in July 2020; the dates of the convention were later changed to August 17-20, 2020. Milwaukee began its preparations for the convention in August 2018 and continued those preparations after notification in March 2020 of an initial grant award of \$50 million.

The Democratic National Convention was designated a National Special Security Event by the Department of Homeland Security.<sup>1</sup> Because of this designation, the United States Secret Service was the lead agency in charge of security. Other participating federal agencies included the Federal Bureau of Investigation—which was the lead agency for intelligence, counterterrorism, and federal criminal violations—and the Federal Emergency Management Agency—which was the lead agency for emergency consequence management. The Milwaukee Police Department (Milwaukee PD) was the lead local law enforcement agency and planned contracts with police agencies across the country to bring an estimated 3,000 law enforcement and public safety officers into Milwaukee to provide convention security-related services.

The outbreak of the Coronavirus 2019 (COVID-19) in March 2020, as well as Wisconsin health measures intended to protect the public and slow the spread of the virus, ultimately led to a much smaller DNC than originally planned. Between March 2020 and July 2020, Milwaukee and Milwaukee PD officials, as well as political, federal, state, and local leaders, held discussions about the size, scale, location, and format of the DNC. During this period, Milwaukee and Milwaukee PD officials met periodically with BJA officials to discuss

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<sup>1</sup> A National Special Security Event (NSSE) is an event of national or international significance deemed by the Department of Homeland Security to be a potential target for terrorism or other criminal activity. Other NSSEs include presidential inaugurations, major international summits attended by world leaders, and major sporting events.

the impact these developments would have on Milwaukee’s role in providing convention security and the use of security support grant funds.

In June 2020, the Democratic National Committee announced its plans for a scaled-down convention and, in early August 2020, again modified its plans and announced a fully virtual convention. In conjunction with these modifications to the convention planning, Milwaukee submitted an updated grant budget in July 2020. As a result of Milwaukee’s update, BJA approved a budget reduction of the original \$50 million DNC Grant award by \$9.5 million. In September 2020, BJA approved a budget modification, further reducing the total budget to \$25,000,000. Although OJP officials knew that the total spent would be less than \$25,00,000, they decided to wait to formally reduce the grant amount further and de-obligate additional funds because the city was working to finalize its expected grant-related activity. Table 2 shows the original grant budget and subsequent reduction for each budget category.

**Table 2**

**DNC Grant Reduction in Cost from Scaled Back Convention**

Cost Category	Original Budget	Budget Reductions	Finalized Convention Budget
Personnel and Fringe Benefits	\$5,050,958	\$4,291,398	\$759,560
Travel and Training	0	(\$1,645)	\$1,645
Equipment	\$5,883,420	\$1,351,074	\$4,532,346
Supplies	\$3,342,558	\$929,838	\$2,412,720
Contracts	\$33,211,012	\$25,016,832	\$8,194,180
Other	\$0	(\$8,270,313)	\$8,270,313 <sup>a</sup>
Indirect Costs	\$2,500,000	\$1,670,764	\$829,236
<b>Totals:</b>	<b>\$49,987,948</b>	<b>\$24,987,948</b>	<b>\$25,000,000</b>

<sup>a</sup> The “Other” category was created by OJP and represents unbudgeted funds that Milwaukee did not expend and will be de-obligated by OJP.

Source: OJP and Milwaukee grant records

The personnel and contracts categories represented the largest reductions. The \$25 million reduction in contracts resulted primarily from the cancellation of agreements between Milwaukee and other law enforcement agencies that would have provided personnel to assist in convention security. The \$4.29 million reduction in personnel and fringe benefits resulted from Milwaukee lowering its projection of hours that would be worked by police and other city personnel. Additionally, Milwaukee canceled some equipment purchases and services and was able to reduce its indirect costs.

## **Milwaukee, Wisconsin**

Located in eastern Wisconsin, Milwaukee is the largest city in Wisconsin, and according to the U.S. Census Bureau had a population of 577,222 residents in August 2020. The Milwaukee PD provides police services for the seven districts within the city. In August 2021, the Milwaukee PD employed 1,768 officers and 600 civilian personnel.

## **OIG Audit Approach**

The objectives of this audit were to determine whether costs claimed under the grant were allowable, supported, and in accordance with applicable laws, regulations, guidelines, and terms and conditions of the grant, and to determine whether the grantee demonstrated adequate progress towards achieving the program goals and objectives. To accomplish these objectives, we assessed performance in the following areas of grant management: program performance, financial management, expenditures, budget management and control, drawdowns, and federal financial reports.

We tested compliance with what we consider to be the most important conditions of the grant. The DOJ Grants Financial Guide (Financial Guide) and the award documents contain the primary criteria we applied during the audit. The results of our analysis are discussed in detail later in this report. Appendix 1 contains additional information on this audit's objectives, scope, and methodology.

# Audit Results

## Program Performance and Accomplishments

To determine if Milwaukee met the DNC Grant goal and objectives, we reviewed grant documentation, performance reports Milwaukee was required to submit to BJA, and other award documentation. We also interviewed Milwaukee officials and reviewed Milwaukee's compliance with grant award special conditions.

## Program Goals and Objectives

The goal of the DNC Grant was to provide a safe and secure environment for an originally estimated 50,000 convention delegates, elected officials, members of the media, and visitors. To achieve this goal, Milwaukee was authorized to use award funds to purchase law enforcement-related equipment and supplies and mobilize over 3,000 police and public safety officers to provide for a safe and secure convention. Ultimately, the Democratic National Convention Committee informed Milwaukee that due to COVID-19 the convention would be much smaller than originally planned. According to Milwaukee officials and records provided to us, about 300 visitors attended the convention in person and approximately 650 police and public safety officials provided security and support services. To determine if Milwaukee accomplished its revised goal to protect a smaller convention, we interviewed Milwaukee PD and city officials and reviewed Milwaukee's reporting on grant activities and other grant documentation. We found that Milwaukee accomplished its stated plans for advance planning and coordination, and there were no reports of any convention attendees being harmed. We therefore concluded that Milwaukee accomplished the revised goal of the DNC Grant.

## Required Performance Reports

According to the Financial Guide, the funding recipient should ensure that valid and auditable source documentation is available to support all data collected for each performance measure specified in the program solicitation. To verify Milwaukee's performance reporting, we judgmentally selected for testing four activities from Milwaukee's June and December 2020 performance reports. We then traced these activities to supporting documentation, and we determined that Milwaukee's reports were adequately supported.

## Compliance with Special Conditions

Special conditions are the terms and conditions that are included with the award. We tested Milwaukee's compliance with grant award special conditions by judgmentally selecting for testing the following five special conditions that were significant to performance under the grant and not addressed in another section of this report.

1. Training – BJA required that both the Point of Contact (POC) and all Financial Points of Contact (FPOC) for this award successfully complete OJP's Financial Management and Grant Administration Training.
2. Lobbying – The award required that the federal funds could not be used to support or oppose the enactment, repeal, modification, or adoption of any law, regulation, or policy, at any level of government.

3. Confidentiality Agreements – The award prohibited Milwaukee or any related contractor from requiring any employee or contractor to sign an internal confidentiality agreement or statement that prohibits or otherwise restricts the reporting of waste, fraud, or abuse to an investigative or law enforcement representative of a federal department or agency.
4. Duplication of IT Networks – To avoid duplication of efforts, the award required that IT systems employ existing networks as the communication backbone to achieve interstate connectivity,
5. Body Armor – The DNC Grant required that all grant-funded body armor comply with DOJ National Institute of Justice standards and other federal requirements cited in the award documentation.

We determined that Milwaukee complied with the special conditions we reviewed.

### **Grant Financial Management**

According to the Financial Guide, grant recipients are required to establish and maintain adequate accounting systems and financial records and to accurately account for funds awarded to them. To assess Milwaukee's financial management of the DNC Grant and compliance with special grant financial management requirements imposed by BJA, we interviewed Milwaukee's financial staff and reviewed Milwaukee's financial policies and procedures. Additionally, we reviewed Milwaukee's Single Audit Reports for FYs 2018 and 2019. We also performed testing in areas relevant to the management of this grant, as discussed throughout this report. Based on our review of Milwaukee's controls, we did not identify significant concerns related to grant financial management.

### **Grant Expenditures**

According to the Financial Guide, allowable costs are those costs consistent with the principles set out in the Uniform Guidance 2 C.F.R. § 200 and those permitted by the grant program's authorizing legislation. Table 3 shows Milwaukee's approved budget categories for the DNC Grant.

**Table 3**

**DNC Grant Categories and Actual Expenditures**

Cost Category	Expenditure Overview	Actual Expenditures	Percentage of Total Expenditures
Personnel and Fringe Benefits	Labor hours and fringe benefits	\$759,561	4.54%
Travel and Training	Travel for training and planning activities	\$1,645	0.01%
Equipment	Information Technology (IT) hardware, software, protective equipment, vehicles, patrol boat and accessories, and camera upgrades	\$4,532,346	27.09%
Supplies	Medical supplies, crowd control supplies, and radio equipment	\$2,412,720	14.42%
Contracts	Liability insurance, vehicle rental	\$8,194,180	48.98%
Indirect Costs	Non-specific operational costs (i.e., overhead)	\$829,236	4.96%
<b>Totals:</b>		<b>\$16,729,687</b>	<b>100%</b>

Source: Milwaukee and OJP grant records

**Personnel and Fringe Benefit Costs**

Milwaukee expended \$759,561 in personnel and fringe benefits for 585 police, 61 fire, and 8 public works employees as shown in Table 4 below.

**Table 4**

**Personnel and Fringe Benefits by City Department**

Department	Number of Employees	Personnel	Fringe Benefits	Total
Police	585	\$531,770	\$0	\$531,770
Fire	61	139,608	83,931	223,540
Public Works	8	2,361	1,890	4,251
<b>Totals:</b>	<b>654</b>	<b>\$673,739</b>	<b>\$85,821</b>	<b>\$759,561</b>

Source: Milwaukee Grant Records

We tested 19 employees for whom Milwaukee was reimbursed personnel and fringe benefits costs. Overall, we tested \$34,427 in personnel costs and \$9,677 in fringe benefits costs, and we determined that the personnel costs charged to the grant for all employees were allowable and accurately calculated. Additionally, Milwaukee officials were able to provide adequate support showing employees worked on convention-related activities.

## Other Direct Costs

Milwaukee expended \$15,140,891 for equipment, supplies, travel and training, and contracts. We tested 37 transactions totaling \$11,075,673. We determined that all transactions were procured according to grant requirements, allowable, properly approved, accurately recorded, and supported.

Milwaukee's grant expenditures included payments for a \$7.7 million contract for liability insurance. Milwaukee acquired the liability insurance in response to the potential terrorism or criminal activity risks in hosting a National Security Special Event. The OIG's September 2021 audit report on the Republican National Convention (RNC) grant made to the city of Charlotte, North Carolina, includes a recommendation for OJP to consider requiring contracts reimbursed from convention security award funds to offer greater flexibility to host cities when emergency situations require termination.<sup>2</sup> This recommendation made in our RNC grant report is general and does not apply only to the RNC grant. Therefore, we do not make the same recommendation here.

## Indirect Costs

Indirect costs are costs of an organization that are not readily assignable to a particular project but are necessary to the operation of the organization and the performance of the project. Non-federal entities can use an indirect cost rate that was approved by a federal awarding agency for all federal awards provided the rate is current and based on an acceptable allocation method.

Milwaukee had approved indirect cost rates for the awards in our audit and charged \$829,236 in indirect costs to the awards. We determined that Milwaukee used the proper approved rates for the award, used allowable direct costs to calculate its base, and calculated the indirect cost accurately.

## Accountable Property

The Financial Guide requires grant recipients to maintain property records that include a description of the property, serial number, source of the property, and other information including information that would identify property acquired with federal funds.<sup>3</sup> Further, when the equipment is no longer needed, grantees must request disposition instructions from the grant-making component.

Milwaukee expended \$4,532,346 for accountable property that included motor vehicles, all-terrain vehicles, motorcycles, camera upgrades, medical equipment, and communications equipment. A complete list of Milwaukee's DNC equipment purchased with grant funds is provided in Appendix 2. We tested Milwaukee's compliance with accountable property requirements by judgmentally selecting for testing 11 property items and 1 major upgrade to existing camera equipment.

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<sup>2</sup> U.S. Department of Justice, Office of the Inspector General, Audit of the Bureau of Justice Assistance Presidential Candidate Nominating Convention Grant Awarded to Charlotte, North Carolina for the 2020 Republican National Convention, [Audit Report 21-115](#) (September 2021)

<sup>3</sup> Additionally, the Financial Guide requires identification of the title holder, acquisition date, cost of the property, percentage of federal participation in the cost of the property, location of the property, use and condition of the property, and disposition data.

For each property item, we obtained photographic evidence of the property with serial numbers and were able to verify all 11 items. Because this audit was performed remotely, we also had the Milwaukee officials complete a Property Acknowledgment Letter attesting to having possession of the property we tested.

## Budget Management and Control

According to the Financial Guide, grant recipients are responsible for establishing and maintaining an adequate accounting system, which includes the ability to compare actual expenditures or outlays with budgeted amounts for each award. Additionally, the grant recipient must initiate a Grant Adjustment Notice (GAN) for a budget modification that reallocates funds among budget categories if the proposed cumulative change is greater than 10 percent of the total award amount.<sup>4</sup> For the DNC Grant, OJP required that a GAN be submitted and approved for all budget modifications, regardless of the percentage of the total award amount. During the grant period, Milwaukee submitted three grant budget modifications, each of which OJP approved. We compared Milwaukee’s grant expenditures to its approved budget and determined the budget was properly managed.

## Drawdowns

According to the Financial Guide, an adequate accounting system should be established to maintain documentation to support all federal fund receipts. If, at the end of the grant award, recipients have drawn down funds in excess of federal expenditures, unused funds must be returned to the awarding agency. For the DNC Grant, BJA required prior approval for each drawdown, and Milwaukee made drawdowns on a reimbursement basis. As of June 30, 2021, the city had drawn down \$16,729,687 as reported in the city’s final Federal Financial Report and closeout report. Table 5 illustrates the award amount, total drawn down, and the balance.

**Table 5**

**Award Drawn Down and Balance**

Grant Number	Total Award	Amount Drawn Down	Project Period End Date	Balance
2020-ZC-BX-0002	\$25,000,000	\$16,729,687	6/30/2021	\$8,270,313

Source: OJP Grant Records

To assess whether Milwaukee managed grant receipts in accordance with federal requirements, we compared the total amount reimbursed to the total expenditures in the accounting records. We determined that the drawdowns matched the accounting records. At the end of the grant in June 2021, \$8,270,313 remained in unobligated funds. As of September 2021, these funds remain pending de-obligation by OJP.

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<sup>4</sup> More recently, OJP has employed Grant Adjustment Modifications (GAM). According to the Justice Grants System’s Grant Award Modification Job Aid Reference Guide, GAMs are created to update the award details but are used only to modify a key fact or detail about the award.

## **Federal Financial Reports**

According to the Financial Guide, grant recipients shall report on each financial report the actual expenditures and unliquidated obligations incurred for the reporting period, as well as cumulative expenditures. To determine whether Milwaukee submitted accurate Federal Financial Reports, we compared the city's four reports submitted for calendar year 2020 to its accounting records. We determined that quarterly and cumulative expenditures for the reports reviewed matched the accounting records.

## **Conclusion**

As a result of our audit testing, we concluded that Milwaukee generally managed the grant that we reviewed appropriately and achieved the grant's stated goals and objectives. We found that all tested expenditures were allowable, supported, and in accordance with applicable laws, regulations, guidelines, and the terms and conditions of the grant. Additionally, we found that Milwaukee adhered to guidance related to program performance and accomplishments, grant financial management, budget management and control, drawdowns, and federal financial reports.

# APPENDIX 1: Objectives, Scope, and Methodology

## Objectives

The objectives of this audit were to determine whether costs claimed under the grant were allowable, supported, and in accordance with applicable laws, regulations, guidelines, and terms and conditions of the grant; and to determine whether the grantee demonstrated adequate progress towards achieving the program goals and objectives. To accomplish these objectives, we assessed performance in the following areas of grant management: program performance, financial management, expenditures, budget management and control, drawdowns, and federal financial reports.

## Scope and Methodology

We conducted this performance audit in accordance with Generally Accepted Government Auditing Standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

This was an audit of the Office of Justice Programs (OJP) Bureau of Justice Assistance Grant Number 2020-ZC-BX-0002 awarded to the city of Milwaukee for security support during the 2020 Democratic National Convention. The final amount of the award was \$25,000,000. As of June 30, 2021, Milwaukee had drawn down \$16,729,687 of the total grant funds awarded, and OJP officials have stated the remaining \$8,270,313 will be deobligated. Our audit concentrated on, but was not limited to March 23, 2020, through June 30, 2021. As a result of the COVID-19 pandemic response, we performed our audit fieldwork exclusively in a remote manner.

To accomplish our objectives, we tested compliance with what we consider to be the most important conditions of Milwaukee's activities related to the audited grant. We performed reviews and tested Milwaukee's compliance in areas related to program progress reports, financial reports, drawdowns, and budget management. We also performed sample-based audit testing for grant expenditures including payroll and fringe benefits and other direct costs charged to the DNC Grant, including Milwaukee's equipment, contracts, and supplies expenditures. In this effort, we employed a judgmental sampling design to obtain broad exposure to numerous facets of the grant. This non-statistical sample design did not allow projection of the test results to the universe from which the samples were selected. The Department of Justice (DOJ) Grants Financial Guide and the award documents contain the primary criteria we applied during the audit. We discussed the results of our audit with OJP and Milwaukee officials and provided a draft of this report for their review.

During our audit, we obtained information from OJP's legacy Grants Management System and its new JustGrants system, as well as Milwaukee's accounting system specific to the management of DOJ funds during the audit period. We did not test the reliability of those systems as a whole, therefore any findings identified involving information from those systems were verified with documentation from other sources.

## Internal Controls

In this audit, we performed testing of internal controls significant within the context of our audit objectives. We did not evaluate the internal controls of Milwaukee to provide assurance on its internal control structure as a whole. Milwaukee's management is responsible for the establishment and maintenance of internal controls in accordance with 2 C.F.R. § 200 Uniform Requirements. Because we do not express an opinion on Milwaukee's internal control structure as a whole, we offer this statement solely for the information and use of Milwaukee and OJP.<sup>5</sup>

We assessed the operating effectiveness of these internal controls and did not identify any deficiencies that we believe could affect Milwaukee's ability to correctly state financial and performance information, and to ensure compliance with laws and regulations. We did not identify any internal control deficiencies; however, because our review was limited to these internal control components and underlying principles, it may not have disclosed all internal control deficiencies that may have existed at the time of this audit.

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<sup>5</sup> This restriction is not intended to limit the distribution of this report, which is a matter of public record.

## APPENDIX 2: Democratic National Convention Security Support Grant Expenditures

Description	Amount
Liability insurance contracts	\$7,712,115
Vehicles	1,787,764
Surveillance	996,352
Indirect costs	829,236
Police, fire, and public works personnel costs	759,560
Medical Supplies and Equipment	675,867
Communication supplies and software	562,949
Personal protective equipment	539,504
Bicycles and accessories	435,292
Boats and maritime operations	332,729
Tactical supplies and equipment	321,076
Operational software	185,679
Chemical, Biological, Radiological, and Nuclear supplies and equipment	185,136
Parking lot rentals	175,085
Nourishment	170,541
Barriers	157,138
Trailers and accessories	123,168
Less-than-lethal munitions	100,681
Motorcycles and accessories	99,337
Vehicle modifications, upgrades, and accessories	96,853
Computers and Software	59,989
Crowd control	59,044
Traffic Management	56,276
General Security	52,709
Operation center rental and HVAC	41,695
Emergency Operations Center	40,714
Bomb Squad	39,313
Uniforms and identification	35,416
Fire Suppression	31,574
Vehicle rental	19,144
K9 unit	13,635
Printing	13,591
Miscellaneous supplies	8,972
Lodging and supplies	6,091 <sup>a</sup>
Munitions and accessories	3,816
Travel and Training	1,645
<b>Total:</b>	<b>\$16,729,687<sup>b</sup></b>

<sup>a</sup> Although lodging costs for external law enforcement officers were cancelled, Milwaukee had some expenses in this category due to non-refundable purchases and deposits.

<sup>b</sup> Difference in the total of this table is due to rounding.

# APPENDIX 3: Office of Justice Programs Response to the Draft Audit Report



U.S. Department of Justice

Office of Justice Programs

Office of Audit, Assessment, and Management

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Washington, D.C. 20531

October 25, 2021

MEMORANDUM TO: Carol S. Taraszka  
Regional Audit Manager  
Chicago Regional Audit Office  
Office of the Inspector General

FROM: Ralph E. Martin  
Director *Ralph E. Martin*

SUBJECT: Response to the Draft Audit Report, *Audit of the Bureau of Justice Assistance 2020 Democratic Presidential Candidate Nominating Convention Grant Awarded to Milwaukee, Wisconsin*

This memorandum is in response to your correspondence, dated October 13, 2021, transmitting the subject draft audit report for the City of Milwaukee, Wisconsin. The draft audit report does not contain any recommendations directed to the Office of Justice Programs (OJP). OJP has reviewed the draft audit report and does not have any comments.

We appreciate the opportunity to review and comment on the draft audit report. If you have any questions or require additional information, please contact Jeffery A. Haley, Deputy Director, Audit and Review Division, on (202) 616-2936.

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