Comptroller's Investigative Report

Metropolitan Human Relations Commission

December 2, 2025

Jason E. Mumpower
Comptroller of the Treasury

Division of Investigations

Jason E. Mumpower
Comptroller

December 2, 2025

Metropolitan Human Relations Commission
150 2nd Avenue North
Nashville, TN 37201

Members of the Metropolitan Human Relations Commission:

The Office of the Comptroller of the Treasury conducted an investigation of selected records of the Metropolitan Human Relations Commission, 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 20th 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

Metropolitan Human Relations Commission

The Office of the Comptroller of the Treasury investigated allegations of malfeasance related to the former deputy executive director of the Metropolitan Human Relations Commission. The investigation was initiated after officials of the Metropolitan Government of Nashville and Davidson County notified the Comptroller of the Treasury of questionable transactions and employee reimbursement payments. The investigation was limited to selected records for the period February 11, 2013, to July 3, 2025, to include the repayment of funds to the Metropolitan Government of Nashville and Davidson County. The results of the investigation were communicated with the Office of the District Attorney General of the 20th Judicial District.

BACKGROUND

The Metropolitan Human Relations Commission (MHRC) is formally established by Chapter 2.132 of the Metropolitan Government of Nashville and Davidson County (Metro) Code. MHRC is a 17-member body charged with protecting the personal dignity of all people in Metro by reviewing and investigating complaints of discrimination and providing Metro citizens with education and awareness to lessen and eliminate discrimination and prejudice. Per Metro Code 2.132.080(b), MHRC "shall not have the power to expend any public funds for the employment of personnel or any other purpose until such time as an appropriation of funds for the commission has been adopted by the metropolitan council." MHRC is empowered by the Metro Code to employ an executive director and staff to administer its mission. MHRC's executive director, who had been in place since 2015, resigned in January 2022, and the position was vacant through April 2022. The chairman of MHRC then resigned as chairman and was hired as MHRC's executive director in May 2022.

In addition to its stated mission, MHRC may elect to pay sponsorships to nonprofit organizations to support events or projects for the benefit of the people of Nashville. These sponsorship payments are made with the expectation that the funds will be used for the sponsored event or project; they are not general donations. MHRC's internal financial guidelines state that if an MHRC employee wishes for MHRC to sponsor a particular event or project, then the employee should discuss the opportunity with the executive director and provide key information such as the amount of the sponsorship, the purpose of the event/project, and the organization to which the sponsorship would be paid. An organization receiving a sponsorship from MHRC must provide MHRC with an invoice indicating the amount and purpose of the sponsorship. If the sole purpose of an event is to fundraise, or if it is not free to attend, then MHRC cannot sponsor the event.

Mark Eatherly was hired by MHRC in 2013 as a program coordinator. He was promoted to the role of MHRC's program manager and later director of operations and special projects before he assumed the title of deputy executive director in 2022. Eatherly noted on his employee profile page on Metro's website that his work was "…focused on creative interventions in inequitable systems and processes." Eatherly was responsible for approving purchases for MHRC beginning in at least 2015, and he served as the sole approver of MHRC purchases and employee reimbursement requests, including his own, from at least the start of 2022 until March 2025. Eatherly was placed on administrative leave by Metro Human Resources on June 13, 2025. Eatherly resigned from employment at MHRC effective July 3, 2025.

RESULTS OF INVESTIGATION

1. FORMER METROPOLITAN HUMAN RELATIONS COMMISSION DEPUTY EXECUTIVE DIRECTOR MARK EATHERLY MISAPPROPRIATED METRO FUNDS FOR HIS PERSONAL BENEFIT TOTALING AT LEAST $62,463.48

A. Eatherly directed payments of MHRC funds to organizations that he formed and controlled, and he used at least $36,250 of those funds for purposes outside of those stated on invoices filed with MHRC

Eatherly directed payments of MHRC funds to organizations he formed and controlled, and he used at least $36,250 of those funds for purposes outside of those stated on invoices filed with MHRC. While employed at MHRC, Eatherly formed multiple entities and registered them with the Tennessee Secretary of State. In certain cases, he opened bank accounts or PayPal accounts for these entities. Investigators did not find evidence that Eatherly made adequate disclosures to Metro of his involvement with these entities. Eatherly registered at least three of the entities he formed as vendors in Metro's payment system:

1. Sow Good
   Sow Good was incorporated in 2016 and later operated under the assumed name Fare4All. The initial filing with the Tennessee Secretary of State listed Eatherly's home address as Sow Good's address, and Eatherly was listed as the incorporator. Investigators found evidence that Eatherly took measures to conceal his involvement with the entities he formed, as later the address for Sow Good was changed to 41 Peabody Street in Nashville, Tennessee, which is the address of a shared office space for startup entities. All of Eatherly's subsequent filings on behalf of the entities he formed were registered to the Peabody Street address.

2. Food Access Network of TN
   Food Access Network of TN was formed and registered with the Tennessee Secretary of State in 2019. The initial filing with the Tennessee Secretary of State listed the incorporator as "M.E.", and the initial filing fees were paid by Sow Good's bank account. In communications with other Metro personnel, Eatherly made it seem as though he

communicated with a third party from Food Access Network of TN about the payment of an invoice **(Refer to Exhibit 1)**. Eatherly then filed an assumed name of TN Social Innovation Fund for that entity.

Exhibit 1

Happy Tuesday, [redacted]

I hope you are staying safe and sane.

Do you know if these invoices were processed? The Food Access folks are saying they never received payment.

Thanks!

Mark

A June 23, 2020, email from Eatherly to an employee in Metro Payment Processing, implying he was contacted by "Food Access folks" pertaining to an outstanding payment to Food Access Network of TN

3. Tennovate, LLC
   Tennovate LLC was formed as a limited liability company with the Tennessee Secretary of State in 2020. The initial filing with the Tennessee Secretary of State listed "M. Eatherly" as the founder. A later filing added Tennovate L3C as an assumed name for this entity.

From July 6, 2018, to February 14, 2024, Eatherly issued 16 checks from Metro to entities he formed, totaling $86,750. Of this amount, $73,500 cleared Metro's accounts and were deposited into the bank accounts of Sow Good and Food Access Network of Tennessee. All checks were endorsed by Eatherly.

Eatherly facilitated these payments by registering the entities as vendors in Metro's payment system and then submitting and approving invoices on behalf of MHRC. The invoices related to the $73,500 received by Sow Good and Food Access Network of TN requested MHRC sponsorships for nine events and one project. Investigators determined that seven of the nine sponsored events never occurred. The two sponsored events that did occur were in 2018 and 2019, and investigators found no evidence to suggest that the seven events subsequently sponsored from late 2019 through 2021 occurred.

Investigators determined that Eatherly misappropriated $36,250 for the seven events that did not occur and used those funds for his personal benefit. Personal purchases included Eatherly's personal internet and cell phone bills, food delivery, rideshare purchases, and significant travel expenses, such as hotels, taxis, airline tickets, and other travel-related expenses in the United Kingdom, France, Ireland, the Netherlands, Spain, Italy, and Germany. To maintain his scheme, Eatherly used misappropriated funds to pay for a membership at the shared office space located at 41 Peabody Street in Nashville, where Metro checks to his organizations were mailed, and to pay business filing fees to the Tennessee Secretary of State and Vermont Secretary of State for his organizations. The remaining $37,250 in payments received by Sow Good and Food Access Network of TN for the two events and one project that did occur, while tied to legitimate activities, are considered questionable because Eatherly controlled the organizations that received the funds, creating a conflict of interest.

The remainder of the $86,750 issued to Eatherly's organizations was two checks totaling $13,250: $7,500 to Food Access Network of Tennessee and $5,750 to Tennovate LLC. Metro voided both checks before they cleared, and Eatherly made no attempt to have Metro reissue them.

Summary of Payments to Organizations Controlled by Mark Eatherly	
Description	**Amount**
Total Metro Checks Issued to Organizations Controlled by Eatherly	$ 86,750.00
Less: Checks Voided by Metro	$ 13,250.00
Metro Checks Deposited by Organizations Controlled by Eatherly	$ 73,500.00
Composition of $73,500 Deposited by Organizations Controlled by Eatherly	
Metro Payments Misappropriated by Eatherly for His Personal Benefit	$ 36,250.00
Questionable Payments to Organizations Controlled by Eatherly	$ 37,250.00

B. Eatherly received at least $11,713.48 of reimbursements from Metro for ineligible expenses

From October 2019 through May 2025, Eatherly submitted 33 expense reimbursement claims totaling $57,190.20. Investigators determined that at least $11,713.48 of these claims were for ineligible expenses, and an additional $43,933.72 are questionable due to missing documentation and lack of oversight.

Investigators determined that MHRC surrendered its departmental credit card prior to 2022, and it became practice for employees to be reimbursed for purchases they made with requirements for detailed documentation, including full receipts and itemized lists for each reimbursement claim.

Investigators determined that after the former executive director left MHRC at the start of 2022, Eatherly stopped providing supporting documentation for his expense reimbursements. The new executive director told investigators that they never reviewed expense reimbursements or expenditures for MHRC and relied entirely on Eatherly to do so. Eatherly approved his own claims without oversight or documentation. Investigators concluded that $43,933.72 of the total reimbursement payments to Eatherly are questionable due to the lack of documentation and lack of oversight.

Ineligible expenses reimbursed included:

- $4,121.75 for expenses paid by the Sow Good bank account, which was primarily funded by MHRC sponsorship payments. Eatherly had not used his personal funds to pay these expenses and, therefore, he was not entitled to reimbursement for them. By seeking reimbursement, Eatherly essentially "double-dipped."

- $1,808.02 for his personal cell phone bills, despite already receiving a Metro cell phone stipend.
- $5,783.71 for expenses of external organizations, including $4,883.71 for Sow Good's membership fees at the shared office space.

Eatherly established this membership in Sow Good's name in May 2019, and Sow Good began paying monthly fees for office space and a mailbox. After the former executive director left Metro at the start of 2022, Eatherly submitted the invoices Sow Good had received from that entity dating back to 2019 for an expense reimbursement dated February 2, 2022. Eatherly changed the name on the membership from Sow Good to "Human Relations", obtained a billing statement with the membership's billing history since May 2019, and submitted the billing statement for expense reimbursement, even though the invoices had originally been billed to Sow Good. Eatherly manipulated the billing history document to show all past invoices as billable to "Human Relations" **(Refer to Exhibit 2)**.

Exhibit 2


Sow Good
81-3566421
110 N 9th Street
TN
37206

INVOICE C82422341031007
Thursday, January 20, 2022

Period: January 20 - February 20
Paid: Tuesday, January 25, 2022

Quantity	Details	Unit Price	SubTotal	Tax

STATEMENT
Wednesday, February 2, 2022

BILLING DETAILS

Human Relations
62-0694743
404 James Robertson Parkway
TN
37219

Top image: portion of original invoice billed to Sow Good
Bottom image: portion of document submitted for reimbursement by Eatherly for "Human Relations"

Eatherly continued to submit expense reimbursement claims for these membership fees through March 2024. These membership fees were ineligible for expense reimbursement because Metro had already provided an office space and MHRC had no need for the coworking space at this separate office. Additionally, investigators found that the membership fees were originally paid using Metro funds received by Sow Good through MHRC sponsorships initiated by Eatherly.

C. Eatherly received at least $14,500 by passing funds to an account he controlled through an external organization to conceal that he was the recipient of the funds

Eatherly also served as a board member of Celebrate Nashville, Incorporated (CN), which operates the annual Celebrate Nashville Cultural Festival. Investigators found no evidence that Eatherly disclosed his board position to Metro. In 2022 and 2023, Eatherly directed three payments totaling $101,500 from MHRC to a bank account controlled by CN that was created at his request **(Refer to Investigative Result 2, below)**. At Eatherly's request, three payments totaling $14,500 were made from that bank account to a PayPal account in the name of TN Social Innovation Fund on May 8, May 15, and June 8, 2023. The operator of CN told investigators that these payments were for the creation of a website. The TN Social Innovation Fund is an assumed name of Food Access Network of TN, a nonprofit created and controlled by Eatherly. The TN Social Innovation Fund's PayPal account was registered with Eatherly's name, social security number, and personal addresses. Investigators identified general withdrawals and payments to an online gaming platform from this account following the transfers.

Summary Table of Misappropriation for Personal Benefit	
Method	**Amount**
A. Misappropriation of MHRC sponsorship payments to Sow Good & Food Access Network of TN	$ 36,250.00
B. Misappropriation via ineligible expense reimbursements	$ 11,713.48
C. Misappropriation of MHRC sponsorship payments to CN	$ 14,500.00
Total Misappropriation for Personal Benefit – All Methods	$ 62,463.48

2. FORMER METROPOLITAN HUMAN RELATIONS COMMISSION DEPUTY EXECUTIVE DIRECTOR MARK EATHERLY INITIATED UNAUTHORIZED PAYMENTS OF METRO FUNDS TOTALING AT LEAST $196,500 TO SUPPORT THE SAVE THE MORRIS INITIATIVE

Exhibit 3

Exterior of the Morris Memorial Building located at 330 Dr. Martin Luther King Jr. Blvd. in Nashville, Tennessee

The Morris Memorial Building (Morris) is located at the corner of 4th Avenue and Dr. Martin Luther King Jr. Boulevard in Nashville, Tennessee, and is listed in the National Register of Historic Places **(Refer to Exhibit 3)**. Multiple Metro mayoral administrations have considered using Metro funds to acquire the building, but none budgeted for its purchase. Eatherly led an initiative, "Save the Morris", to influence the Metro government to approve the purchase of the Morris for use as a civil rights museum and office space. Eatherly recruited several individuals from the African American and civil rights history preservation communities, including at least one member of Metro Council to support the initiative.

Eatherly convinced the operator of CN to open a new bank account identified as Donor Fund. Between June 15, 2022, and January 25, 2023, Eatherly directed three Metro checks totaling $101,500 to be issued and deposited into this account. These were the only funds deposited into the Donor Fund. From June 2022 through June 2023, Eatherly directed $33,755.85 of MHRC funds to be spent from the Donor Fund. The funds were used to pay over $9,000 to a community engagement coordinator, $7,500 to a musical group to perform at a 2023 Juneteenth fundraiser for Save the Morris, and to pay a $2,500 administrative fee to CN. In addition, three separate transfers totaling $14,500 were made to a PayPal account that Eatherly controlled **(Refer to Investigative Result 1C**). In mid-2023, the operator of CN informed Eatherly that CN's purpose did not align with the activities associated with the Donor Fund and requested to terminate the Donor Fund. Eatherly then directed the remaining funds to be transferred to the

Community Foundation of Middle Tennessee (CFMT). After the transfer, $244.15 of MHRC's funds remained in the Donor Fund.

Before the transfer, Eatherly directed the creation of a new fund at CFMT, called the Nashville African American and Civil Rights History Fund. CFMT officials questioned the fund's purpose and asked whether feasibility studies had been performed to assess the viability of the proposed museum. On May 11, 2023, Eatherly responded by email to CFMT **(Refer to Exhibit 4)**:

Exhibit 4

To be frank, people have tried different ways to bring this to fruition over the years. They played by whatever rules they were told to play by and talked to the "right" people in different positions of power, but the Morris Building is in more danger than ever, and we still don't have a museum. So, in this case, "conventional wisdom" is an oxymoronic phrase.

Portion of May 11, 2023, response from Eatherly's Metro email account to officials at CFMT pertaining to the creation of a new fund at CFMT to support Save the Morris

CFMT personnel informed Eatherly that this fund would incur investment management fees based on a percentage of funds deposited, and Eatherly elected to proceed. Eatherly was established as the "designated representative" of the new fund at CFMT, and a committee was being created to oversee the use of the funds. On June 2, 2023, Eatherly delivered a check transferring $67,500 from the Donor Fund to the Nashville African American and Civil Rights History Fund at CFMT **(Refer to Exhibit 5)**.

Exhibit 5

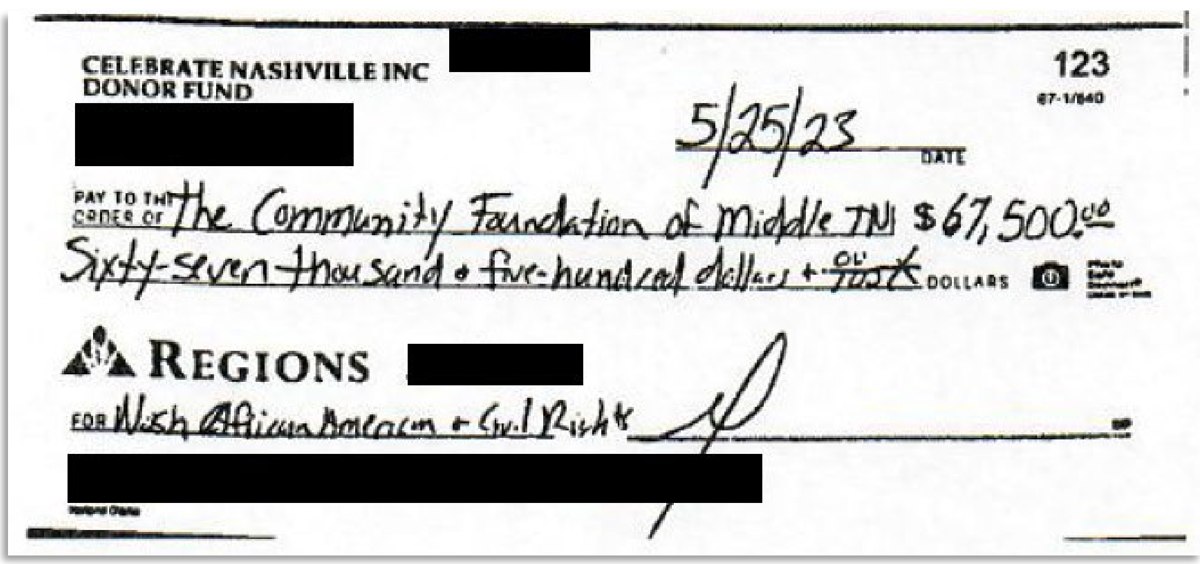
CELEBRATE NASHVILLE INC [redacted]
DONOR FUND
[redacted]
123
67-1/840
5/25/23 DATE
PAY TO THE ORDER OF The Community Foundation of Middle TN $67,500.00
Sixty-seven thousand & five-hundred dollars + 00/100 DOLLARS
REGIONS [redacted]
FOR Nash African American + Civil Rights
[redacted]

Image of check signed and delivered by Eatherly to CFMT to transfer MHRC funds from Donor Fund to CFMT

Eatherly requested and received an invoice from CFMT, which he used to initiate a Metro payment to CFMT to the Nashville African American and Civil Rights History Fund. Eatherly approved the invoice on behalf of MHRC, and on June 8, 2023, Metro paid $95,000 via ACH to CFMT. As of June 8, 2023, $162,500 ($67,500 plus $95,000) of MHRC funds had been deposited into the Nashville African American and Civil Rights History Fund.

From June 9, 2023, through April 17, 2024, $137,322.84 of the funds received by the Nashville African American and Civil Rights History Fund were spent at Eatherly's direction. The largest expense from that total was for a Save the Morris fundraiser concert, to be held on July 15, 2023. A combined $89,133.71 was spent, which reserved The Ryman Auditorium and booked three performing artists. Bookings and reservations were made without reviewing the calendar of other events in Nashville, and the fundraiser concert conflicted with another major event at a large arena. Ticket sales for the fundraiser concert were very low, so the Save the Morris event was canceled and never rescheduled. The late cancellation of the fundraiser concert caused Save the Morris to remain contractually liable for all expenses to the venue and artists. The full amount of MHRC funds spent from the Nashville African American and Civil Rights History Fund also included $15,938.11 of expenses for a 2023 Juneteenth fundraiser and awareness event for Save the Morris, $10,284.99 for a public relations firm to conduct an advertising campaign, and $9,966.03 on administrative fees charged by CFMT. Investigators determined that the gross amount raised by all fundraisers during the life of the Nashville African American and Civil Rights History Fund was $890.

In July 2023, Metro's Office of Financial Accountability discovered the $95,000 payment to CFMT during a fiscal year-end review and requested the Metro Department of Law to determine whether MHRC had authority to make these payments without Metro Council approval or affirmative consent. The Metro Department of Law concluded that MHRC had no authority to make those payments. Eatherly was subsequently directed by Metro Finance to retrieve all funds paid to CFMT on July 27, 2023. At that time, $93,543.13 had already been spent from the Nashville African American and Civil Rights History Fund, and the fund had a remaining balance of $69,846.87. Eatherly did not request that CFMT return the remaining funds to Metro and continued to direct the disbursement of an additional $43,779.71 from the fund. These funds included a $12,000 payment in April 2024 to a media company for work on an MHRC documentary unrelated to the Save the Morris initiative.

Investigators spoke to the Metro Council member recruited by Eatherly to support Save the Morris. The Metro Council member stated that, despite being on the Save the Morris committee, they were unaware that any MHRC funds had been used to fund anything related to Save the Morris and that the use of funds was never discussed or reviewed by the committee. The Metro Council member provided emails to investigators showing that they asked Eatherly in May 2023 whether their involvement created a conflict of interest. Eatherly responded that he did not foresee any issues and advised that the council member could resign from the Save the Morris committee if Metro Council ever decided to appropriate funds in support of Save the Morris.

The Morris building was ultimately sold to a private developer in late 2023. Eatherly did not request the return of the remaining funds in the Nashville African American and Civil Rights History Fund or alert Metro officials to the existence of these funds before his resignation in July 2025. The $244.15 which remained in the Donor Fund was never recovered. In total, Eatherly initiated $196,500 of unauthorized MHRC payments to CN and CFMT, of which Eatherly misappropriated $14,500 for his personal benefit.

3. FORMER METROPOLITAN HUMAN RELATIONS COMMISSION DEPUTY EXECUTIVE DIRECTOR MARK EATHERLY DIRECTED THE UNAUTHORIZED CREATION OF AN EXTERNAL ACCOUNT TO HOLD AND CONTROL METRO FUNDS TOTALING $45,500

Several years before the Nashville African American and Civil Rights History Fund was created at Eatherly's direction, a private citizen created a support fund for MHRC at CFMT. Use of that fund is restricted by the approval of a committee, in accordance with the private citizen's wishes.

On June 21, 2023, Eatherly contacted the CFMT, and stated that MHRC had unspent funds at the end of its fiscal year due to two new unfilled budgeted positions. He indicated MHRC wanted to keep the funds beyond fiscal year-end without restrictions in how funds could be spent. CFMT officials informed Eatherly that MHRC would need to create a new, non-endowed fund to allow unrestricted use of the money. CFMT asked Eatherly if CFMT would receive a grant document or other formal documentation from Metro, as it did previously when Metro grant funds had been disbursed to CFMT. Eatherly responded that the payment would be a sponsorship, rather than a grant, so documentation would not be necessary.

The fund was created and named the Metro Equity & Inclusion Fund. Eatherly told CFMT that oversight committee for the fund would be the MHRC executive committee and executive director. Eatherly requested an invoice, approved payment, and on July 17, 2023, Metro paid CFMT $45,500 via ACH for the sponsorship of the Metro Equity & Inclusion Fund.

In July 2023, a subsequent fiscal year-end review by Metro's Office of Financial Accountability determined that MHRC was the only Metro department to overspend its budget for the 2022-2023 fiscal year. The overspending was traced to two payments totaling $140,500 ($95,000 plus $45,500) that MHRC made to CFMT in 2023. Metro's Office of Financial Accountability subsequently contacted the Metro Department of Law to determine if MHRC had authority to make these payments without Metro Council approval or affirmative consent. The Metro Department of Law advised that MHRC had no known authority to make those payments.

On July 27, 2023, Eatherly was directed to retrieve all funds paid to CFMT. He requested only $45,500 from CFMT, which was paid to the Metro Equity & Inclusion Fund. CFMT issued a refund check to MHRC dated September 21, 2023, for $45,500, but the check was never deposited by MHRC. After CFMT discovered the check had not cleared its account, it reissued a check to Metro dated April 11, 2024, which was deposited on April 29, 2024.

On November 13, 2025, the Davidson County Grand Jury indicted Mark Scott Eatherly, II on Theft over $60,000, but less than $250,000, one count of Official Misconduct, and one count of Money Laundering.

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.

Metropolitan Human Relations Commission Investigation Exhibit

INTERNAL CONTROL AND COMPLIANCE DEFICIENCIES

Pursuant to Tenn. Code Ann. § 9-18-102(a), "Each agency of state government and institution of higher education, along with each county, municipal, and metropolitan government, shall establish and maintain internal controls" to protect funds, property, and other assets from waste, loss, unauthorized use, or misappropriation. Furthermore, according to the Tennessee Comptroller of the Treasury's Internal Control and Compliance Manual, municipal governments must establish and maintain an adequate internal control system for purposes of financial reporting, managing operations, and legal compliance. Our investigation revealed deficiencies in internal control and compliance, some of which contributed to Eatherly's ability to perpetrate his misappropriation schemes without prompt detection. These deficiencies included:

Deficiency 1: MHRC commissioners failed to ensure that the MHRC executive director was providing oversight of departmental personnel and failed to adequately segregate incompatible duties

MHRC's commissioners noted upon the hire of the executive director in 2022 that he would require "substantial" support with all administrative tasks. The commissioners failed to ensure that an appropriate structure was in place for the adequate segregation of incompatible duties, nor did any commissioners make an effort to provide appropriate oversight of MHRC's use of Metro's funds.

Deficiency 2: Metro Finance officials failed to correct MHRC's issues with purchasing despite discovering its noncompliance with policy and a lack of segregation of duties

Metro Finance officials reached out to Eatherly in early 2024 to determine why the former executive director of MHRC, who had left in early 2022, was not responding to its requests. Eatherly responded that the individual was no longer employed by Metro, and that he had been submitting and approving all purchases for MHRC. Metro Finance informed Eatherly that it was not acceptable for him to do so and stated it was necessary for the new executive director to be trained and involved in that process to create an adequate segregation of incompatible duties. Eatherly failed to implement the directives from Metro Finance, and Metro Finance did not follow up on the matter until March 2025, when Metro Internal Audit informed officials at Metro Finance that the situation had still not been resolved.

Deficiency 3: The MHRC executive director failed to ensure Eatherly complied with Metro's ethics and conflict of interest policies

Metro Mayor Executive Order 22 requires that Metro employees avoid conflicts of interest, using their office for private gain, losing complete independence, making official decisions outside of official channels, and affecting adversely the confidence of the public in the integrity of Metro, among other things.

Deficiency 4: The MHRC executive director failed to ensure that Eatherly followed its policies pertaining to expense reimbursements

The MHRC Office Procedures Manual permits expense reimbursements only for those incurred in the conduct of MHRC business. It requires that supporting itemized receipts be submitted in order for a reimbursement to be paid, and all claims for reimbursement must be submitted within 30 days of the incurrence of the expense. Eatherly routinely violated these rules by submitting personal expenses for reimbursement, some of which were previously paid using Metro funds and not with his personal funds, and by submitting expenses more than 30 days after incurred.

Deficiency 5: The MHRC executive director failed to ensure that Eatherly followed its policies pertaining to sponsorship payments

The MHRC Office Procedures Manual prohibits the payment of any MHRC funds for sponsorships that are solely fundraisers. Eatherly used MHRC funds by transferring them out of Metro accounts using invoices that he created and then paid for fundraising events related to the Save the Morris initiative.

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