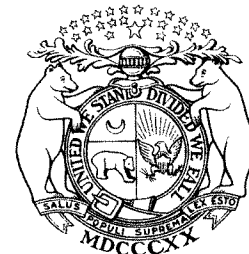




ALFRED MONTGOMERY

SHERIFF

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October 22, 2025



Rochelle Collins, Audit Manager
Comptroller's Officer Internal Audit Section
1520 Market Street, Suite 3005
St. Louis, Missouri 63103

Subject: Sheriff's Office of the City of St. Louis: Special Review

Dear Ms. Collins:

The City of St. Louis Sheriff's Office provides the following amendment to its Management Response for the Special Review, Sheriff's Office of the City of St. Louis, Project #2026-SP01:

Finding No. 1: The Sheriff's Office has reviewed the finding and disagrees with the conclusion as it is factually inaccurate because the vast majority of the budget deficit identified in the audit was the result of payroll and compensatory time (CT) payouts authorized in late December 2024 by the prior administration. The finding states that the Sheriff's Office exceeded its budget because it 1) failed to adhere to the procurement process for the City of St. Louis, and 2) failed to work with the Supply Division to potentially gain cost savings in the purchase of uniforms, badges, an automobile, and golf carts. The reason for the budget deficit has nothing to do with either of those stated reasons. In addition, the uniforms, badges, automobile and golf carts were reasonable purchases made for the improvement of operations.

In response to the Finding No. 1, this statement provides clarification and factual context regarding the payroll and compensatory time (CT) payouts authorized in late December 2024. The following information details the sequence of events, identifies responsible parties, and distinguishes actions taken under the previous administration from those of the current leadership. Upon assuming office on January 1, 2025, Sheriff Alfred Montgomery immediately initiated an internal review of all payroll activity surrounding the transition period and has cooperated fully with the Comptroller's Office and the Board of Aldermen to ensure transparency, accountability, and corrective action where warranted. However, neither the Comptroller's Office nor the Board of Aldermen have investigated the following information, including in this Audit. The Sheriff's Office requests that the Comptroller's Office investigate the following information that supports its disagreement with this audit finding.

1. On December 28, 2024, the Sheriff's Office processed a payroll run totaling approximately \$865,000. Included in this amount was over \$245,000 in Compensatory Time (CT) payouts to sixteen outgoing FLSA-exempt administrators. These payouts were authorized and approved by outgoing Sheriff Vernon Betts prior to the transition of office on January 1, 2025.

2. All sixteen individuals who received CT payouts were classified as FLSA-exempt under 29 U.S. Code § 213(a)(1), which excludes executive, administrative, and professional employees from the overtime and compensatory time provisions of the Fair Labor Standards Act. As such, these administrators were not eligible to accrue compensatory time under federal law or Sheriff's Office internal policy.
3. The sixteen FLSA-exempt administrators who received CT payouts were: Vernon Betts, Kevin Meyer, Scott Horan, Michael Gamache, James Borisch, Tammy Hogan, Dawn Kehoe-Roop, Cornelius Hogan, Timothy Haill, James Buchanan, Anthony Evans, Joseph Neill, Donald Hawkins, Frank Parker, Mark Lalumandier, and Gary Vehlewald.
4. According to City Budget Division records, the Sheriff's Office was budgeted \$11,731,518 for Fiscal Year 2024, including \$7,385,180 for employee salaries. The office expended \$7,763,390, exceeding the salary appropriation by \$378,210 (105%). The December 2024 CT payouts were a significant factor contributing to this budget overage.
5. On May 24, 2022, several of these same administrators—Betts, Meyer, Horan, Gamache, Borisch, Haill, Evans, and Hawkins—received their Peace Officer Standards and Training (POST) certifications from Lincoln University. Each individual was granted CT hours for attending classes, despite being off-duty and without any corresponding budget allocation. These hours later converted to paid CT in December 2024, creating an unfunded liability.
6. On June 2, 2025, Colonel Yosef Yasharahla, a 30-year Sheriff's Office veteran, testified before the St. Louis City Aldermanic Budget and Public Employees Committee that the sixteen administrators "paid themselves out" before the Montgomery administration took office. Col. Yasharahla further testified that this appeared to be a violation of policy, stating that administrators were not permitted to accrue CT under office bylaws.
7. Following Col. Yasharahla's testimony, Alderman Matt Devoti clarified the record, asking whether the \$245,000 in payouts occurred prior to Sheriff Montgomery assuming office. Sheriff Alfred Montgomery confirmed that documentation exists showing Sheriff Betts' authorization of all CT payouts, and that the new administration inherited these payments as already processed in the system.
8. Payroll documentation supports these statements. For example:
 - a. Frank Parker (#2922) received 400.5 hours of CT valued at \$12,415.50, authorized by Sheriff Betts on December 16, 2024.
 - b. Timothy Haill (#2193) received 620.55 hours of CT valued at \$24,411.20, authorized on the same date.
 - c. Anthony Evans (#1928) received 653.3 hours of CT valued at \$20,235.97, likewise authorized on December 16, 2024.Combined, these three examples total \$56,762.67 in CT payouts signed by Sheriff Betts before the new administration's start.

9. The POST training referenced by Col. Yasharahla was partially funded through the Missouri Blue Scholarship, which provides up to \$6,000 per recruit directly to training academies for non-sponsored attendees. The Sheriff's Office does not reimburse or subsidize POST training. Therefore, the granting of CT for off-duty academy attendance created duplicate compensation—one from the State (through scholarship) and another from the City (through CT pay).
10. The Sheriff's Office utilizes the UKG (Ultimate Kronos Group) payroll system, which tracks employee hours, wage calculations, and tax deductions. The December 28, 2024 pay period was authorized by former Lieutenant Tammy Hogan and signed by Sheriff Betts on December 16, 2024. These authorizations confirm the payouts occurred under the prior administration.
11. Since assuming office, Sheriff Alfred Montgomery has implemented multiple corrective actions, including:
 - a. Eliminating CT eligibility for all FLSA-exempt personnel.
 - b. Requiring dual authorization for payroll approvals and payouts.
 - c. Instituting monthly payroll audits within the Fiscal Operations unit.
 - d. Coordinating with the City Budget Division to ensure alignment with City policy and Charter provisions.
 - e. Requesting legal review on potential recovery options for unauthorized CT payments.
12. The Montgomery administration did not authorize, process, or distribute the December 2024 compensatory time payouts. All evidence—including payroll authorizations, UKG records, and signed documentation—shows these transactions were completed under former Sheriff Vernon Betts prior to January 1, 2025. The current administration remains committed to full transparency, compliance with FLSA and City regulations, and restoring financial integrity to the St. Louis City Sheriff's Office. However, neither the Comptroller's Office nor the Board of Aldermen have investigated the above information, including in this Audit. The Sheriff's Office requests that the Comptroller's Office investigate the following information that supports its disagreement with this audit finding.

Finding No. 2: The Sheriff's Office has reviewed the finding and agrees that stronger accounting controls and procedures should be implemented. The Sheriff's Office notes that it has already implemented integrating the Oracle Accounting System into its financial reporting processes and with its new Chief Human Resources Officer that started on September 8, 2025, the Sheriff's Office anticipates improvement in its accounting controls and procedures. Finally, the Sheriff's Office has decided to separate the role of personnel and fiscal operations as recommended in this audit. The Sheriff's Office anticipates assigning a current employee internally to this task or, if necessary, conducting a job search for a dedicated fiscal operations manager to complement the new Chief of Human Resources, thereby aligning our organization with traditional organizational charts.

Finding No. 3. The Sheriff's Office has reviewed the finding and agrees that stronger internal controls are needed over payroll. The Chief Human Resources Officer and Director of Human Resources in conjunction with line commanders at the Major and Lt. Colonel level have started a review to strengthen the internal controls on this point.

Finding No. 4. The Sheriff's Office has reviewed the finding and agrees there was an insufficient segregation of duties. To that end, the Sheriff's Office has now separated the role of personnel director from the role of manager of fiscal operations. Personnel matters are now assigned to the Chief Human Resources Officer. As noted above, the Sheriff's Office anticipates assigning a current employee internally to this task or, if necessary, conducting a job search for a dedicated fiscal operations manager to complement the new Chief of Human Resources, thereby aligning our organization with traditional organizational charts.

Respectfully,

A handwritten signature in black ink that reads "Michelle Patterson". The signature is written in a cursive, flowing style with a large loop at the end of the last name.

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