



PAUL YOUNG  
MAYOR

EXECUTIVE DIVISION

TENNESSEE

**Independent Report of Internal Audit**

February 16, 2024

Ms. Cerelyn “CJ” Davis, Interim Chief  
Police Services Division  
170 N. Main Street, Room 1201  
Memphis, Tennessee 38103

Dear Interim Chief Davis:

We have performed the procedures detailed below, which were agreed to by the Property and Evidence (P&E) Disposition Review Team (DRT), regarding the final disposition of a controlled substances destruction project, for bulk narcotics. The controlled substances were destroyed on February 6, 2024.

An agreed-upon procedures engagement involves the auditor performing specific procedures that the engaging party has agreed to and acknowledged to be appropriate for the engagement’s intended purpose and reporting on findings based on the procedures performed.

The DRT is responsible for executing standard operating procedures related to the selection, and release of controlled substances included in this engagement. Additionally, the DRT is responsible for conducting appropriate research to confirm whether selected controlled substances are eligible for disposition. The DRT has agreed to and acknowledges that the procedures to be performed are appropriate for the purpose of this engagement.

Our primary objective for this engagement was to determine if bulk narcotics selected for destruction were disposed in accordance with *Tennessee Code Annotated, § 53-11-203 Procedure Final When No Claim Interposed* and *53-11-451(k) Goods Subject to Forfeiture – Seizure – Disposition*. Our secondary objective was to confirm whether items with material variances (greater than 12%) between seizure and destruction weights are justified. Lastly, our objective was to provide reasonable assurance that the narcotics were actually destroyed.

This report may not be suitable for any other purpose. The procedures performed may not address all the items of interest to a user of the report and may not meet the needs of all users of the report and, as such, users are responsible for determining whether the procedures performed are appropriate for their purposes.

The procedures and associated findings related to controlled substances listed on Court Order P48016 are as follows:

- **For 100% of the confiscated narcotics documented on the initial DRT inventory list, compare pertinent details such as property receipt and weight to confirm the inventory list matches the actual narcotic selected for destruction (bulk).**

The inventory spreadsheet obtained from DRT contained a total of 29 bulk items. We traced each item to the inventory spreadsheet by validating receipt number, drug description, and seizure weight. We noted weight discrepancies for all 29 items.

DRT stated that it was unknown whether the items were originally weighed inside or outside their corresponding containers. After weighing the first three (3) items both inside and outside their containers the seizure weights and audit weights continued to vary either way. We agreed to weigh all bulk items inside their containers for consistency purposes. The adjusted weights were documented on the final inventory listing.

- **Select a random sample of bulk narcotics to request supporting documentation regarding case disposition to confirm selected controlled substances were eligible to be destroyed.**

We selected all 29 items to request documentation showing they were released for destruction. We obtained a sample of 15 items (from the 29) and requested additional supporting documentation (i.e., Visions screen-print) to prove they were listed in the Visions Database. While conducting our review of the additional support documentation, we noticed that there were no Chain of Custody reports provided. According to DRT management, the narcotics were stored on top of a storage container inside the facility, which is not an actual storage location. However, the facility itself is considered a secure location. DRT provided a memorandum stating the Chain of Custody reports could not be provided due to the items not being assigned a location in the system. DRT later assigned the items a location in their records management system and provided the Chain of Custody reports.

We obtained and reviewed supporting documentation for all 29 items. Based on our review, all narcotics selected were eligible to be destroyed.

- **Request and review justification for all items with material variances (greater than 12%) between the seizure and destruction weights.**

There were 12 items with weight variances greater than 12%. We requested and obtained justification for all 12 items. DRT concluded that the material variances occurred because they did not know whether the items were initially weighed inside or outside their containers.

- **Select a judgmental sample of bulk narcotics to observe chemical testing.**

We selected a judgmental sample of eight (8) bulk narcotics items for chemical testing. All eight (8) items tested negative.

- **Compare a judgmental sample of items from the final DRT inventory list to the inventory list approved by the court to confirm accuracy.**

We selected all 29 items from the final DRT inventory list and compared them to the items on Court Order P48016. We confirmed all discrepancies were corrected, including the adjusted weights notated during initial testing, and only required changes were made prior to court order approval.

- **Witness the transportation and final destruction of all the controlled substances selected for destruction.**

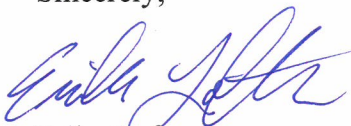
We witnessed the transportation and final destruction of all narcotics selected for destruction on February 6, 2024.

We conducted our engagement in accordance with attestation standards established by the American Institute of Certified Public Accountants. We were not engaged to and did not conduct an examination or review, the objective of which would be the expression of an opinion or conclusion, respectively, on the controlled substances destruction project, for bulk narcotics. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

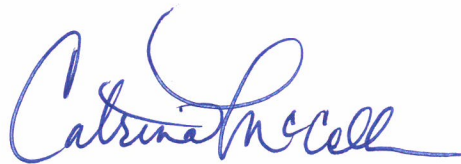
This report is intended solely for the information and use of City officials, and is not intended to be, and should not be used by anyone other than these specified parties. However, this report is a matter of public record, and its distribution is not limited.

We are required to be independent of Police Services Division, and to meet our other ethical responsibilities, in accordance with relevant ethical requirements relating to the agreed upon procedures engagement. We appreciate the cooperation of P&E management and staff during our engagement. If we can be of further assistance, please advise.

Sincerely,

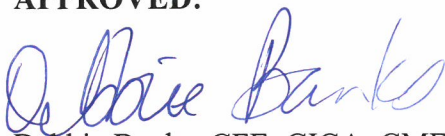


Erika Lefton  
Auditor-In-Charge



Catrina McCollum, CFE, CICA, CMFO  
Project Manager

**APPROVED:**



Debbie Banks, CFE, CICA, CMFO  
City Auditor

City of Memphis – Internal Audit Service Center  
Police Services Division  
P&E Narcotics Destruction  
February 16, 2024  
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c: Paul Young, Mayor  
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Shawn Jones, Assistant Chief, Administrative Services, Police Services Division  
Sharonda Hampton, Deputy Chief, Administrative Services, Police Services Division  
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