

**City of Detroit
Office of Inspector General**

Alleged Fraudulent Backfill Load Tickets Submitted
by Gayanga Co.
OIG File No. 22-0018-INV



September 27, 2023

**Ellen Ha, ESQ. CIG
INSPECTOR GENERAL**

**City of Detroit
Office of Inspector General
Investigative Report**

**ALLEGED FRAUDULENT BACKFILL LOAD TICKETS SUBMITTED BY GAYANGA CO.
OIG FILE No. 22-0018-INV**

DATE:
9/27/2023

I. Summary

On July 20, 2022, the City of Detroit Office of Inspector General (OIG) received a complaint, through the City of Detroit Demolition Department (“3D”).¹ The complaint, which was initially received by the 3D, alleged potential fraud in connection with backfilling operations and load tickets submitted by Gayanga Co. (Gayanga).² Gayanga is a licensed wrecking contractor that is wholly owned by Brian McKinney.³ It has contracts to perform demolitions and demo-related services for the City of Detroit (City).⁴ The complaint alleged that a supervisor at Gayanga instructed a subordinate to place addresses on load tickets (sometimes called “dirt tickets”) that did not correspond to the actual addresses to which the trucks were deployed.⁵ However, the complainant declined to provide additional information in fear of retaliation for

¹ As of July 1, 2023, the City of Detroit Demolition Department was renamed the City of Detroit Construction and Demolition Department.

² Email from 3D Deputy Director, Tim Palazzolo to OIG Attorney Jennifer Bentley, RE: Potential Fraud Claim – Gayanga Truck Load Tickets, dated July 20, 2022.

³ Email from Attorney for Gayanga Aaron Burrell to OIG Associate Attorney Tiye Greene, RE: OIG Request for Information | 22-0018-INV, dated September 5, 2023

⁴; See, for example, City of Detroit Contract Purchase Agreement Nos. 6004134, 6003665, and 6003738.

⁵ Email from 3D Deputy Director, Tim Palazzolo to OIG Attorney Jennifer Bentley, RE: Potential Fraud Claim – Gayanga Truck Load Tickets, dated July 20, 2022.

submitting a complaint to the OIG.⁶ Therefore, the OIG closed the initial complaint on August 19, 2022, as without additional information, the OIG could not effectively evaluate the allegations.⁷

On November 10, 2022, the OIG reopened the complaint after receiving additional information from the complainant regarding potentially fraudulent load tickets.⁸ The complainant stated:

- (1) they were told to write load tickets as if drivers from Gayanga were responsible for dumping backfill at various sites while drivers from other companies (subcontractors) were actually delivering the backfill;
- (2) that Gayanga claimed backfill material was coming from 4833 Maybee Road, Clarkston, MI, 48348, but that it was actually coming from unapproved sources that sometimes contained rocks and other materials; and
- (3) that this activity was ongoing and had been occurring for at least six (6) to seven (7) months.⁹

While investigating the above allegations, the OIG discovered that several demolition sites received passing backfill inspection grades based on what appeared to be staged piles of dirt, one (1) or more days before the backfilling was completed.¹⁰ If true, the potential fraud as alleged in the complaint would also extend to backfill monitoring/inspections. Accordingly, the OIG expanded its investigation to determine if the backfill monitors, called field liaisons,¹¹ also engaged in any improper conduct related to their monitoring and inspection duties. Like load tickets, the accuracy and reliability of backfill inspections are important because the condition of dirt in residential areas may directly impact the health, safety, and welfare of Detroit residents.

Based on the evidence reviewed, the OIG was unable to substantiate the complainant's allegations that Gayanga used subcontractors to deliver backfill or that they used unapproved backfill. Similarly, the OIG did not find that any field liaisons engaged in fraudulent activity in connection with their backfill inspections. However, the OIG finds that Gayanga's practices related to backfill load tickets as described below, led to questionable document submissions that may expose risks in 3D's *Documentation Policy* and in its *Demolition Program Compliance Checklist Guidance* ("Compliance Guidelines"). The vulnerabilities for fraud, abuse, waste and/or corruption in the backfill program, as it currently exists, are discussed in Section IV below.

⁶ Memorandum to Ellen Ha, Inspector General, from Jennifer Bentley, OIG Attorney, RE: 22-0306-COM, August 19, 2022.

⁷ *Id.*

⁸ Memorandum to Ellen Ha, Inspector General, from Jennifer Bentley, OIG Attorney, RE: 22-0306-COM, November 10, 2022.

⁹ *Id.*

¹⁰ See, for example, 3D backfill inspection documentation for the following addresses: 6647 Vinewood, 17202 Caldwell, 11157 Rosemary, 452 Harper, 5947 Beaubien, 11067 Rosemary, and 6385 Linsdale.

¹¹ OIG Interview of 3D Field Operations Manager Linda Montgomery, August 3, 2023.

II. Background

3D Demolition Program Data Documentation Policy and Protocols

3D's *Documentation Policy* details the data 3D requires contractors to record and enter and/or upload into Salesforce.¹² The *Documentation Policy* must be followed by all demolition contractors doing business with the City.¹³ 3D's pre-invoice review team (sometimes called the "compliance team") reviews demolition document submissions for compliance with the *Documentation Policy* before invoices can be approved for the work performed.¹⁴ As it relates to backfill load tickets and correlating compliance forms, the *Documentation Policy* states that "[they] must contain all pertinent information for each trucking event. The information includes, but is not limited to, the name of the operator, the truck identification [number], the date of transport, a description of the materials, and the origin and destination of the materials.¹⁵"

Inadequate load tickets or compliance forms, such as an incomplete or inaccurate address, date, or truck number, may cause the ticket or form to be returned to the contractor for more information before an invoice is approved for payment.¹⁶ The pre-invoice review team is expected to identify any issues with the tickets and forms submitted by contractors and return it to them for correction.¹⁷ The pre-invoice review process is 3D's only internal process to verify the accuracy of load tickets.¹⁸

3D Field Operations and Backfill Monitoring Protocols

3D's *Field Team Manual* ("Field Manual") details the duties of field liaisons and the procedures and requirements for backfill monitoring, inspection, and reporting.¹⁹ The *Field Manual* states, in relevant part, that field liaisons are responsible for:

- Regularly monitoring all aspects of pre and post demolition activity to ensure full compliance with but not limited to:

¹² City of Detroit Demolition Program Data and Documentation Policy and Protocols (Updated June 26, 2023); OIG Interview of 3D Deputy Director Tim Palazzolo, August 23, 2023; Note, Salesforce is an online project management application.

¹³ OIG Interview of 3D Deputy Director Tim Palazzolo, August 23, 2023.

¹⁴ *Id.*

¹⁵ City of Detroit Demolition Program Data and Documentation Policy and Protocols (Updated June 26, 2023) at page 21.

¹⁶ OIG Interview of 3D Deputy Director Tim Palazzolo, August 23, 2023; See also, OIG Interview of Gayanga Vice-President LaCresha Ware, August 9, 2023.

¹⁷ *Id.*

¹⁸ *Id.*

¹⁹ Demolition Department Field Team Manual (Updated March 16, 2023) at pages 14-15, 32-33.

- [t]he demolition contract/scope of services as well as any other contracts and scopes of services which may be implemented as part of the pre and post demolition process;
- [t]he City Code, specifically 290-H;²⁰ and
- [a]ll applicable State Law and Federal Law.
- Recording documenting and reporting non-compliance.
- Completing reports/checklists as requested.
- Surveying property conditions and preparing reports as requested to include photos; [and]
- Mitigating issues at demolition sites.²¹

Field liaisons may also be assigned backfill monitoring duties by 3D's field operations manager or field superintendent.²² Field liaisons report directly to the field superintendent, who then reports up to the field operations manager.²³

The *Field Manual* states, in relevant part, that for onsite backfill inspections:

- the field liaison must ensure arrival at the site during backfill operations, which are identified as "in the hole," "pile on site," or "on truck;"
- [the field liaison] will complete certain fields in Salesforce as they relate to backfill monitoring/inspection duties;
- if trucks are onsite delivering backfill, field liaisons should try to get a photograph of the load ticket(s) that correlate to the backfill.²⁴

Further, the *Field Manual* states that while staging dirt is allowed, field liaisons will not inspect the staged material(s) prior to the start of backfilling operations.²⁵ Rather, 3D's inspection of backfill will only take place on the scheduled day of backfill operations for a given site.²⁶

III. Analysis and Findings

Fraudulent Backfill Load Tickets

²⁰ Detroit, Mich., Ordinance 290-H, Building Code Administrative Rules and Regulations, not codified, adopted October 25, 1978.

²¹ Demolition Department Field Team Manual (Updated March 16, 2023) at page 14.

²² *Id.* at page 32.

²³ *Id.* at pages 10-14; *See also*, OIG Interview of 3D Field Operations Manager Linda Montgomery, August 3, 2023.

²⁴ *Id.* at 32-33.

²⁵ *Id.*; Note, "Staged" is defined as "planned, organized or arranged in advance." See, https://www.google.com/search?q=define+staged&rlz=1C1GCEA_enUS1032US1032&oq=define+staged&aqs=chrome..69i57j0i390i650.1558j1j4&sourceid=chrome&ie=UTF-8.

²⁶ *Id.*

The OIG reviewed backfill load tickets and compliance forms for approximately 140 residential demolition sites to determine if Gayanga submitted fraudulent tickets that did not correspond to the actual driver, source and/or volume of the loads. As discussed above, load tickets must contain all pertinent information for each delivery including, the name of the operator (driver), the truck identification number, the date of transport, description of the materials, and the origin and destination of the materials.²⁷ 3D typically rejects load tickets if the site/source addresses, truck number, dirt volume, and/or date are missing or incomplete.²⁸ Any other missing or incomplete information does not usually result in the ticket being rejected or returned to the contractor.²⁹

The OIG investigation revealed that several backfill load tickets and related compliance forms contained inaccurate or insufficient information. However, because those inadequate tickets make up less than two percent (2%) of the nearly 1,300 load tickets and related compliance forms reviewed, the OIG does not find that those few deficiencies rise to the level of fraud.³⁰ Additionally, the evidence reviewed does not substantiate claims that the backfill delivered to the sites came from unapproved sources. Further, no evidence or information reviewed by the OIG indicates that subcontractors delivered backfill in place of the Gayanga employees named on the tickets. Instead, the investigation revealed that most load tickets and compliance forms complied with 3D's policies, as they identified an operator (driver), and listed the relevant addresses, truck numbers, volumes, and dates.³¹ Therefore, for the Gayanga demolition sites we reviewed, the OIG did not find any evidence that substantiates the allegations that Gayanga engaged in any fraud when filling out its backfill load tickets and 3D's backfill compliance forms.

Fraudulent Backfill Inspection Grades

The OIG reviewed 3D's *Field Manual* and backfill inspection information related to approximately 140 demolition sites to determine whether 3D field liaisons engaged in any fraud while performing their backfill monitoring and inspection duties. According to the *Field Manual*, field liaisons are not permitted to inspect dirt that has been staged at a site before the start of backfilling operations.³² Rather, inspections can only be performed during backfilling on or after the day those operations are scheduled.³³

²⁷ City of Detroit Demolition Program Data and Documentation Policy and Protocols (Updated June 26, 2023) at page 21.

²⁸ OIG Interview of Gayanga Vice-President LaCresha Ware, August 9, 2023; OIG Interview of 3D Deputy Director Time Palazzolo, August 23, 2023.

²⁹ OIG Interview of 3D Deputy Director Time Palazzolo, August 23, 2023.

³⁰ The OIG reviewed approximately 1,288 load tickets and related backfill load ticket compliance forms and found approximately 22 inadequate backfill load tickets and related compliance forms.

³¹ OIG Interview of 3D Deputy Director Time Palazzolo, August 23, 2023; See also, City of Detroit Demolition Program Data and Documentation Policy and Protocols (Updated June 26, 2023) at page 21.

³² Demolition Department Field Team Manual (Updated March 16, 2023) at page 33.

³³ *Id.*

The OIG's investigation revealed that 3D's field liaisons performed the relevant backfill inspections in accordance with 3D's backfill monitoring policies and procedures. According to the department's field operations manager and field operations superintendent, it is not unusual to see backfill inspection grades posted before the close of backfilling operations.³⁴ Field liaisons perform random inspections during the course of operations and post results in real time.³⁵ Further, it is acceptable to inspect a pile of dirt near an open hole if the liaison was there to observe the dirt being unloaded.³⁶

Therefore, inspection images showing a pile of dirt next to an open hole are not inappropriate and are not evidence of any wrongdoing by a field liaison.³⁷ Records showing inspection grades posted one (1) or more days before backfilling operations are complete, likewise, do not evidence fraudulent activity.³⁸ Furthermore, records showing that additional backfill material was delivered post-inspection are not by themselves evidence of fraud in the backfilling operations or inspection process.³⁹ Finally, no evidence or information reviewed by the OIG in this investigation shows that any inspections were performed prior to the scheduled start of backfilling operations. Thus, the OIG does not find that any 3D field liaisons engaged in any fraudulent activity while performing backfill inspections for the Gayanga demolition sites reviewed.

Potential Fraud in Backfill Data Documentation and Review

3D's *Documentation Policy* and *Compliance Guidelines* address many potential risks of fraud. However, this investigation reveals there may be additional risks that should be addressed by 3D. In particular, the OIG finds that 3D's reliance on the contractors to complete and submit backfill load tickets and compliance forms highlights potential vulnerabilities in 3D's *Documentation Policy* and *Compliance Guidelines*. The potential vulnerabilities observed during this investigation include:

- 3D's inability to confirm whether a driver or other contractor representative's name is complete or correct;
- 3D's inability to confirm whether a truck number is complete or correct; and
- 3D's inability to confirm whether a quantity of material reported on a ticket or compliance form is complete or correct.

³⁴ OIG Interview of 3D Field Operations Manager Linda Montgomery, dated August 3, 2023; OIG Interview of 3D Field Superintendent Robert Hill, dates August 3, 2023.

³⁵ *Id.*

³⁶ OIG Interview of 3D Field Superintendent Robert Hill, dates August 3, 2023.

³⁷ *Id.*

³⁸ *Id.*

³⁹ *Id.*

Based on our observations, we believe these issues alone leave enough room for fraud, abuse, waste, or corruption to occur in the backfill program. 3D's pre-invoice review team is expected to identify any deficiencies or false information in the load tickets and compliance forms.⁴⁰ The *Compliance Guidelines* list several questions for the pre-invoice team to consider when reviewing the load tickets and forms for accuracy and completeness of information.⁴¹

The questions the *Compliance Guidelines* list include whether the driver's name, load quantity, and truck number shown are complete and correct.⁴² However, reviewers are not familiar with contractors' employees and vehicles.⁴³ They are not provided employee rosters and vehicle lists to compare to the load tickets and forms that are submitted.⁴⁴ Therefore, members of the pre-invoice review team do not have sufficient information to confirm whether a driver's name, quantity of dirt, or truck number is complete or correct.

Between June and October 2022, approximately 1.7% of the load tickets and compliance forms submitted by Gayanga for the demo-sites reviewed were either inaccurate or incomplete.⁴⁵ While the OIG did not find any evidence of intentional omissions or inaccuracies, these tickets are examples of potential risks in the current 3D pre-invoice review process. For example, some load tickets were incomplete or illegible and, therefore, could not be connected to a Gayanga employee.⁴⁶ More specifically, load ticket No. 21898 listed the name of a driver that Gayanga's leadership could not identify when asked.⁴⁷ If the contractor cannot determine whether its load ticket correctly identifies one of its drivers, then a member of 3D's pre-invoice review team certainly would not be able to determine whether the driver's name is accurate or complete.

Ticket No. 21898 also listed a truck number that corresponds to a 2022 GMC Sierra 2500 pick-up truck, which is not the kind of truck used to haul and unload backfill.⁴⁸ In fact, this vehicle is incapable of hauling the amount of backfill listed on the load ticket.⁴⁹ However,

⁴⁰ OIG Interview of 3D Deputy Director Time Palazzolo, August 23, 2023.

⁴¹ City of Detroit Construction and Demolition Department Compliance Checklist Guidance, updated June 2, 2021.

⁴² *Id.*

⁴³ OIG Interview of 3D Deputy Director Time Palazzolo, August 23, 2023.

⁴⁴ *Id.*

⁴⁵ See, for example, Gayanga Load Ticket Nos. 18626, 19541, 20251, 71145 and 70473 and related compliance forms.

⁴⁶ See, for example, Gayanga Load Ticket Nos. 18480, 19611 and 21898.

⁴⁷ OIG Interview of Gayanga Vice-President LaCresha Ware, August 9, 2023; OIG Interview of Gayanga Owner Brian McKinney, August 9, 2023; *Note also*, OIG Interview of Gayanga Vice-President LaCresha Ware, August 9, 2023, describing LaCresha Ware as the "Vice-President of Estimating and Engineering."

⁴⁸ Gayanga List of Trucks and Truck Numbers *attached to* Email from Attorney for Gayanga Todd Russell Perkins to OIG Associate Attorney Tiye Greene, RE: Information Requested, dated August 9, 2023; OIG Interview of 3D Deputy Director Time Palazzolo, August 23, 2023.

⁴⁹ GMC's vehicle specifications indicate that a properly equipped 2500 series Heavy Duty Sierra has a maximum tow capacity of twenty-two thousand, four-hundred and thirty pounds (22,430 lbs.). Twenty-two thousand, four-hundred and thirty pounds equates to approximately thirteen thousand, three hundred and seven cubic yards (13,307 yd³) of material. Therefore, Gayanga's Truck #23, even if equipped with GMC's "Max Trailering Package", can only reasonably tow a maximum of fourteen (14) cubic yards of fill material in a single load; *See*, "GMC Life",

Gayanga claims to have used the vehicle to haul twenty-four (24) yards of dirt in a single load.⁵⁰ A member of 3D's pre-invoice review team did not question Gayanga's unlikely claim because they are not provided a list of Gayanga's vehicles. If the reviewer had used a list of Gayanga's backfill-capable vehicles to compare to load ticket No. 21898 they may have identified the issue and appropriately requested a correction or clarifying information.

The primary purpose of load tickets is to track backfill and other materials from source to site.⁵¹ With each ticket, a contractor is affirming that a particular load weighs a certain amount and came from Place A and was delivered to Place B.⁵² Here, tickets are routinely filled out by laborers who are present at the destination site but do not necessarily see the dirt leave its source.⁵³ In some cases, load tickets may not be completed until the day after the load is picked up and dumped.⁵⁴ Neither of these practices are conducive to ensuring the accuracy of load tickets or to affirming that backfill comes from approved sources.

What's more, no other documents are used to track backfill dirt from source to site.⁵⁵ Therefore, considering the health of Detroit residents and active issues regarding the use of unapproved backfill materials,⁵⁶ the OIG recommends that 3D implement a few policy enhancements to improve its ability to track dirt used in residential areas. Recommendations regarding potential policy enhancements and additions to the pre-invoice review process are detailed in Section V below.

IV. Conclusion

Based on our review, the OIG did not find evidence to substantiate the allegations that Gayanga submitted fraudulent load tickets that falsely identify the source of materials, volumes, and/or drivers of the loads. The OIG also did not find any evidence that subcontractors are hauling and delivering materials for Gayanga from unapproved sources. Finally, the OIG did not find that field liaisons engaged in fraudulent activity in completing backfill inspection grades and

⁵⁰ General Motors Corporation, September 7, 2023, <https://www.gmc.com/gmc-life/trucks/2024-sierra-heavy-duty-trailinger-power#:~:text=The%20extensive%20refinements%20under%20the.up%20to%204%2C178%20lbs.%E2%80%A0>;

Note, 1 yd³ / cu yd = 1,685.55 lb. wt.

⁵¹ See Gayanga Load Ticket No. 21898.

⁵² OIG Interview of 3D Deputy Director Tim Palazzolo, August 23, 2023.

⁵³ *Id.*

⁵⁴ OIG Interview of Gayanga Truck Driver Robert Howard, August 9, 2023; OIG Interview of Gayanga Superintendent Angelo Bridges, August 9, 2023.

⁵⁵ OIG Interview of 3D Deputy Director Tim Palazzolo, August 23, 2023.

⁵⁶ *Id.*

⁵⁶ Kayla Clarke, "Howell man billed Detroit \$1M for contaminated backfill dirt used at demolition sites, official say," Click On Detroit, April 25, 2023, <https://www.clickondetroit.com/news/local/2023/04/25/howell-man-billed-detroit-1m-for-contaminated-backfill-dirt-used-at-demolition-sites-officials-say/>; See also, Malachi Barrett, "Council upholds demo contractor suspension amid probe into contaminated dirt," Bridge Detroit, June 13, 2023, <https://www.bridgedetroit.com/council-upholds-demo-contractor-suspension-amid-probe-into-contaminated-dirt/#:~:text=Detroit%20City%20Council%20has%20endorsed.Den%2DMan%20Contractors%2C%20Inc.>

reports. Despite the appearance that backfill inspection grades had been awarded prematurely, the OIG found that 3D's field liaisons performed the inspections in accordance with 3D's relevant policies and procedures. Although the OIG did not find evidence of fraud, we note that 3D's current *Compliance Guidelines* expose risks for fraud. Therefore, to prevent potential waste, abuse, fraud, or corruption in backfilling operations, the OIG urges 3D to consider the additional policies recommended in Section V below.

V. Recommendation(s)

Based on the above information, the OIG recommends the following:

Load Ticket Data Documentation

Tracking dirt is a necessary step to ensuring the use of clean materials and thereby protect the health, safety, and welfare of Detroit residents. The primary purpose of the load ticket is to ensure that backfill material is being hauled from an approved source and is being dumped to the correct site. In other words, the tickets are to track dirt from its source to site. This investigation reveals 3D's current policies in completing and reviewing the load tickets may not be sufficient to effectively track the dirt and verify the information contained in the tickets.

Presently, when a contractor's employee completes a load ticket, there is no method to determine whether that employee is entering the correct information. More importantly, the tickets by themselves cannot ensure the backfill materials are being tracked from source to site. Furthermore, the purpose and value of load tickets are frustrated by the fact that 3D focuses its review on compliance forms, rather than on the load tickets on which the compliance forms are based.⁵⁷ This leaves room for potential fraud in the process. Therefore, the OIG recommends that 3D work with its contractors to develop a data documentation policy and/or procedure that can better ensure dirt is properly tracked from source to site and to reduce the risks to waste, abuse, fraud, or corruption in the backfill program.

Pre-Invoice Review Audit

The OIG recommends that 3D conduct random audits of backfill load tickets and the correlating compliance forms. The audits would involve a more detailed review of the tickets and forms submitted by contractors to ensure they are truthful, accurate and complete. Key characteristics of the proposed audit process are:

- Auditors should select a random sample of backfill load tickets and related compliance forms submitted by a given contractor.

⁵⁷ OIG Interview of 3D Deputy Director Tim Palazzolo, August 23, 2023.

- Auditors should be provided with employee rosters submitted by contractors to verify the employee who is identified in the load tickets/forms submitted by the contractor is included in the roster.
- Auditors should also be provided with vehicle lists submitted by contractors to verify the vehicle identified in the load tickets and forms submitted by the contractor is included in the list.⁵⁸

The OIG recommends that the pre-invoice team be provided with all necessary information, such as vehicles lists and employee names so they can confirm the accuracy and completeness of the information described in the *Compliance Guidelines*. Therefore, the pre-invoice review team members can effectively confirm the accuracy of backfill load tickets and compliance forms.

VI. Evidence Reviewed

a. Interviews

- i. City of Detroit Demolition Department Field Operations Manager Linda Montgomery, August 3, 2023
- ii. City of Detroit Demolition Department Field Superintendent Robert Hill, August 3, 2023
- iii. City of Detroit Demolition Department Deputy Director Timothy Palazzolo, August 23, 2023
- iv. Gayanga Co. Supervisor Angelo Bridges, August 9, 2023
- v. Gayanga Co. Laborer Antonio Esparza, August 9, 2023
- vi. Gayanga Co. Laborer Cedrick Coachman, August 9, 2023
- vii. Gayanga Co. Owner Brian McKinney, August 9, 2023
- viii. Gayanga Co. Vice-President LaCresha Ware, August 9, 2023
- ix. Gayanga Co. Driver Robert Howard, August 9, 2023
- x. Gayanga Co. Auditor/Jr Project Engineer Shantell Hardaway, August 9, 2023
- xi. Gayanga Co. Driver Sterling Harris, August 9, 2023
- xii. Gayanga Co. Driver Whitney Thorton, August 9, 2023

b. Documents

- i. City of Detroit Demolition Program Demo Load Compliance Checklist Guidance, Updated June 2, 2021
- ii. City of Detroit Demolition Program Backfill Tickets Compliance Form Compliance Checklist Guidance, Updated June 2, 2021
- iii. Demolition Department Field Team Manual, Updated March 16, 2023
- iv. Demolition Department Data and Documentation Policy and Protocols, Updated June 26, 2023

⁵⁸ The Office of Contracting and Procurement (OCP) collects vehicle lists from contractors as a part of the procurement process. Those lists can be shared with 3D to be used in the proposed audits.

- v. City of Detroit Demolition Program Backfill Source Submittal and Review Protocols, Updated July 15, 2020
- vi. City of Detroit Demolition Program Demolition Department Pre-Invoice Review Policy and Protocols, Updated May 26, 2021
- vii. Gayanga Employee Roster, Submitted July 7, 2023
- viii. Gayanga Vehicle Inventory, Submitted August 9, 2023
- ix. February 2022 Certified Payroll Records – Gayanga
- x. March 2022 Certified Payroll Records – Gayanga
- xi. June 2022 Certified Payroll Records – Gayanga
- xii. July 2022 Certified Payroll Records – Gayanga
- xiii. August 2022 Certified Payroll Records – Gayanga
- xiv. December 2022 Certified Payroll Records – Gayanga
- xv. Contract Purchase Agreement No. 6003483, Change Order No. 3, dated August 15, 2022
- xvi. Contract Purchase Agreement No. 6003607, Change Order No. 1, dated April 7, 2022
- xvii. Contract Purchase Agreement No. 6003665, Change Order No. 2, dated December 9, 2022
- xviii. Contract Purchase Agreement No. 6003666, Change Order No. 2, dated December 9, 2022
- xix. Contract Purchase Agreement No. 6003738, Change Order No. 1, dated March 2, 2023
- xx. Contract Purchase Agreement No. 6003740, Change Order No. 1, dated March 2, 2023
- xxi. Contract Purchase Agreement No. 6004134, Change Order No. 2, dated January 28, 2022
- xxii. Contract Purchase Agreement No. 6005140, Change Order No. 1, dated May 31, 2023
- xxiii. Salesforce data related to approximately 140 demolitions sites assigned to Gayanga within the City of Detroit