

Exhibit 20

City of San Antonio TX - Administrative Directive 6.12 – effective date 1/4/1982

EFFECTIVE DATE: January 4, 1982

REVISION DATES: _____

SUBJECT: Use of Telephone: Monthly Billing1. Purpose

This Administrative Directive outlines the process for the monthly billing to the departments for charges which the City incurs for telecommunication services.

2. Responsibility

- a. The Purchasing and General Services Department through the Communication Services Division is responsible for verifying all telecommunication charges billed to the City by the telephone company. This verification will include a review of all equipment charges, a full month's use of service and other charges or credits for partial month's service.

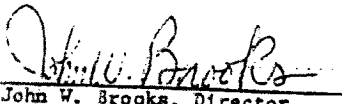
3. Definitions

- a. Telecommunications charges - the charges are categorized as follows:

- 1.) Base Charge - telephone instrument, feature, and directory listing costs (if applicable).
- 2.) Variable Base Charge - pro rata share of the Centrex common service and equipment costs, municipal tax, plus administrative overhead costs.
- 3.) Long Distance Charges - all interstate and intrastate long distance calling charges.
- 4.) Directory Assistance and Other Charges or Credits - all costs for local directory listing information and cost or credits associated with installation, change or removal of service.

4. Procedures

- a. Each department shall review the computer printout provided by the Purchasing Department of the monthly charges, sign the certification form, and return the signed copy to the Purchasing Department within four working days. Any discrepancy with any charge should be fully explained in a typewritten memo attached to the certification statement. The Communication Services Division will take action to resolve the differences with the telephone company.
- b. The Purchasing Department will submit a request for payment with final reports to the Finance Department for processing.
- c. The Finance Department will record the telecommunications charge to the appropriate department account and issue a payment voucher to the telephone company.


John W. Brooks, Director
Purchasing & General Services

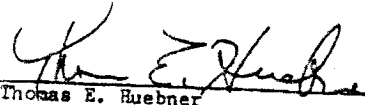

Thomas E. Huebner
City Manager

Exhibit 21

Email of 11/29/2006 – Municipal Integrity Manager Virginia Quinn

Virginia Quinn

From: Michael Armstrong
Sent: Tuesday, November 29, 2005 10:53 AM
To: Virginia Quinn
Subject: RE: Outcome of ITSD investigation

Virginia –

Thank you very much for the efforts of you and your staff in this matter.

As a relative newcomer, the existence of variable accounts came as a surprise to me. We will be working with staff and Management and budget to make sure ITSD is operated in a sound businesslike manner. This information will be useful to me as I consider what should be the appropriate methodology for funding IT activities in the City. I agree that our entire billing system is in disarray, and has been for some time. We are working to bring that under control, but I'm not sure that internal billing as it exists in ITSD provides much value for the City.

Thank you again.

Michael Armstrong

From: Virginia Quinn
Sent: Tuesday, November 29, 2005 10:29 AM
To: Peter Zaroni; Hugh Miller; Michael Armstrong
Subject: Outcome of ITSD investigation

Gentlemen:

As I previously communicated to Hugh Miller, we have concluded the investigation based on the allegations raised by Mr. John Foddrill. The case file is closed with the notation "lack of evidence/unfounded." I wanted to close the loop with you, however, and communicate our findings on one particular area of concern.

As I discussed with you, we conducted a number of interviews with current and former employees concerning the telephone "variable" charge that was established approximately 25 years ago that has been a part of the ITSD budget process ever since. In the process, we uncovered information about the genesis of this charge, and discovered that it was initially well-meaning in nature as a "means to an end." It was apparently started years ago because departments used to be billed separately for their telephone services. The telephone company began complaining to City management because some department's telephone bills were delinquent or contested, and the management of City telephones was a nightmare. It was ultimately determined that ITSD would become the central point for telephone communications in the City; in return, as a way for ITSD to pay for telephone costs incurred across the City, ITSD instituted the "variable" because they didn't know how much the telephone costs would be in any given month.

However, over time, the "variable" underwent a transformation into the budget line item we know today. (There are actually four "variable" accounts, but the one most often relied upon (and the largest) is the telephone variable.) We established that the telephone "variable" has been used to pay for items completely unrelated to City telephones. Those things included: The ITSD trophy case, training for ITSD personnel, remodeling at ITSD, numerous department-specific purchases, and data equipment for the City network. If, during the course of the year, any single department incurred a large unbudgeted cost item, it was likely that the "variable" would be tapped so that the cost of this item could be spread across City departments. Because City departments were essentially powerless to protest the charge, the practice has continued. The largely unsupervised and unregulated billing of departments across the City under the guise of the telephone "variable" for the last 25 years has resulted in departments having been billed for an untold amount of goods and services from which their department received no benefit or for costs that rightfully *should* have been borne by ITSD.

No laws or written rules were violated in the administration of the telephone "variable" because there never were any; however, it appears clear that the business practices associated with the telephone "variable" were unsound and almost certainly contributed to a laissez-faire fiscal environment at ITSD. Predictably, Contract Services' recent audit of ITSD

showed significant billing problems.

From a budgetary standpoint, best practices suggest that we revisit this methodology for "variable" charging in favor of more acceptable (and clearer) practices. However, if management elects to keep the ITSD internal service funds and its associated variable charges, we recommend that written guidance be adopted to enforce a level of accountability that appears to be missing at this point in time.

*Virginia M. Quinn, Manager
Office of Municipal Integrity
800 Dolorosa, Suite 115
San Antonio, TX 78207
(210) 207-7809*

COSA 01139

Exhibit 22

Letter of 12/5/2007 – Jason Wolff- Bexar County DA's Office



Susan D. Reed
Criminal District Attorney
Bexar County, Texas

December 5, 2007

Mr. John E. Foddrill Sr.
9650 Limestone Pond
San Antonio, TX 78254

Dear Mr. Foddrill Sr.:

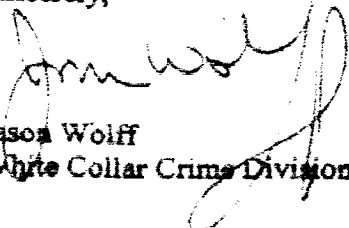
Thank you for your most recent letter dated November 27, 2007 where you provide information to the District Attorney's Office in reference to "instances of abuse and misconduct within the City's Information Technology Systems Department (ITSD)." I am a prosecutor assigned to the White Collar Crime Division of the District Attorney's Office and your communication has been referred to me for review and response.

It appears from your letter that you are seeking the filing of criminal charges. Criminal prosecution, however, requires that certain procedures be followed. First, there is no direct filing of cases with our office. Instead, criminal cases must be filed with the law enforcement agency having jurisdiction over the offense(s) being alleged. Such agencies have the resources and manpower necessary to gather the appropriate evidence and documents, conduct witness interviews, and prepare cases for review by the appropriate prosecuting authority.

Regarding your specific complaint, it appears from your letters that the San Antonio Police Department has reviewed your complaint and determined there were no viable criminal charges, as a result, the D.A.'s Office will not be in receipt of any criminal filings on this matter.

Should you have any questions or further concerns, please do not hesitate to contact me at (210) 335-2404.

Sincerely,

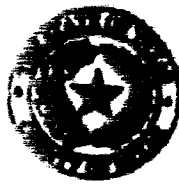

Jason Wolff
White Collar Crime Division

Cadena-Reeves Justice Center - 300 Dolorosa, Fifth Floor - San Antonio, Texas 78205-3030
(210) 335-2311

For Victim Assistance call (210) 335-2105

Exhibit 23

Letter of 8/30/2007 – ADA Brian Chandler- Bexar County DA's Office



Susan D. Reed
Criminal District Attorney
Bexar County, Texas

August 30, 2007

COPY

Mr. Francis B. Wells
340 Treeline Park Apt 1715
San Antonio, Texas 78209

Dear Mr. Wells,

I am in receipt of your letter dated August 17, 2007 in which you allege the City's ITSD department misapplied funds and the City's Municipal Integrity Unit engaged in a scheme to conceal such misapplication. This office takes such allegations very seriously.

It is our general policy to receive such complaints in the form of a report detailing an investigation performed by an investigative law enforcement agency. From the enclosures of your letter, it appears you have contacted the Federal Bureau of Investigation, the Texas Rangers, and the Texas Attorney General's Office. Should one of these agencies or another law enforcement agency file a case with this office for prosecution stemming from these allegations, we will explore the possibility of bringing a criminal action as the evidence and justice requires.

If you have any questions, please feel free to contact this office.

Sincerely,

A handwritten signature in cursive script that reads "Brian Chandler".

Brian Chandler
Assistant District Attorney
(210) 335-2404

Exhibit 24

Letter of 1/8/2008 – Chief Adriana Biggs – White Collar Crime Div - Bexar County DA's Office



Susan D. Reed
Criminal District Attorney
Bexar County, Texas

January 3, 2008

Mr. Foddrill Sr.
9650 Limestone Pond
San Antonio, TX 78254

Dear Mr. Foddrill:

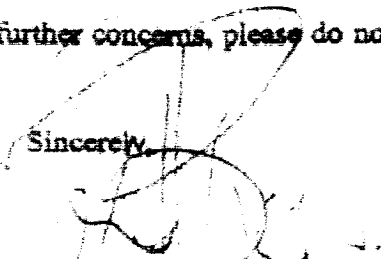
Thank you for your letter dated Oct 9, 2007 where you provide information to the District Attorney's Office in reference to *ITSD*. I am a prosecutor assigned to the White Collar Crime Division of the District Attorney's Office and your communication has been referred to me for review and response.

It appears from your letter that you may be seeking the filing of criminal charges against *ITSD*. Criminal prosecution, however, requires that certain procedures be followed. First, there is no direct filing of cases with our office. Instead, criminal cases must be filed with the law enforcement agency having jurisdiction over the offense(s) being alleged. Such agencies have the resources and manpower necessary to gather the appropriate evidence and documents, conduct witness interviews, and prepare cases for review by the appropriate prosecuting authority.

Regarding your specific complaint, it appears the conduct you are complaining of occurred in San Antonio, therefore the Texas Rangers is the correct agency to contact.

Should you have any questions or further concerns, please do not hesitate to contact me at (210) 335-2404.

Sincerely,


Adriana H. Biggs, Chief
White Collar Crime Division

AHB: mm

Exhibit 25

Email of 10/19/2007 – Sgt. Bloodworth- CID-Texas Attorney General's Office

YAHOO! MAIL

Print - Close Window

Date: Fri, 19 Oct 2007 14:14:42 -0500
From: "Jennifer Bloodworth" <Jennifer.Bloodworth@oag.state.tx.us>
To: foddrill@swbell.net
Subject: Municipal Integrity complaint

COPY

Mr. Foddrill,

The Criminal Investigations Division (CID) of the OAG has reviewed your complaint regarding allegations of open records violations, fraud, etc., by the City of San Antonio. It appears this matter falls within the jurisdiction of the Bexar County District Attorney. The District Attorney may request assistance from the OAG for both investigation and prosecution assistance, but absent that request, CID can take no further action at this time.

Regarding your open records complaint, the attached AG opinion from Feb 2006, which shows you as a recipient, appears to address your concerns as to the city's withholding of certain documents. You may fax any additional complaints regarding open records violations to the Open Records Division at 512-463-2092.

Sincerely,

Sgt. Jennifer Bloodworth
Special Investigations Unit
Criminal Investigations Division
Office of the Attorney General of Texas
512.936.7867
512.478.4963 (fax)
Jennifer.Bloodworth@oag.state.tx.us

Attachments

Files:

AG_opinion.pdf (159k)

Exhibit 26

Letter of 9/15/2008 – Capt. Hank Whitman – Texas Rangers Company D

TEXAS DEPARTMENT OF PUBLIC SAFETY

TEXAS RANGERS

COMPANY "D"

6502 S. NEW BRAUNSFELS RD., San Antonio, Texas 78223
(210) 531-4340 FAX (210) 531-4350

STANLEY CLARK
DIRECTOR

LAMAR BECKWORTH
ASST. DIRECTOR

COMMISSION

ALLAN S. POLUNSKY
CHAIRMAN

C. TOM CLOWE, JR.
CAROL MARCY BARTH
ELIZABETH ANDERSON
COMMISSIONERS

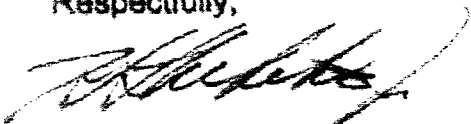
September 15, 2008

John E. Foddrill, Sr.
9650 Limestone Pond
San Antonio, Texas 78254

Mr. Foddrill,

On August 22, 2008, we received a package from the "Office of the Governor – Criminal Justice Division" regarding a correspondence and CD you forwarded to their office. The correspondence alleges the City of San Antonio committed fraud against federal and state grant funded programs. As per our Department policy and protocol, the district attorney must make a formal request to our division to investigate any allegations of public corruption. For this reason, any further correspondence received from you will be immediately forwarded to the Bexar County District Attorney's office.

Respectfully,



H.L. Whitman, Jr., Captain
Texas Rangers Company "D"
San Antonio, Texas