City of New Orleans Office of Police Secondary Employment



Annual Report September 2014 – August 2015

Preface

This annual report serves not only to satisfy the specific requirements of paragraph 349 of the <u>federal consent decree regarding the New Orleans Police Department</u>, but also to offer a transparent overview of how the reforms to the police secondary employment system are progressing. While the period covered, September 2014 through August 2015, does not match the City's fiscal or calendar years, the 12 months covered represents a complete operational year of implementation of these reforms.

This report will review some of the major events leading up to the present with regard to the reform of secondary employment in the NOPD; give an overview of the major process changes; look at the progress made thus far in implementing the changes required by the 41 paragraphs of the consent decree dealing with police details; review how the Office of Police Secondary Employment (OPSE) serves officers, customers, and the citizens of New Orleans; provide a financial overview of the office; and offer a look to the future as the OPSE works with citizens, stakeholders, the US Department of Justice (DOJ), and the United States District Court, Eastern District of Louisiana to make these reforms work and last.

Introduction

The Office of Police Secondary Employment, and the reforms it is charged with enacting, had to be built from the ground up, and largely without precedent. While nearly twenty American public safety agencies today are under federal monitoring, with more under investigation, New Orleans is the only city where the conduct of police officers' off-duty security work is circumscribed by a federal court order. This came about after the US Department of Justice's 2010-2011 investigation of the New Orleans Police Department identified the impact that paid details had on the effectiveness of policing. Dissension in the ranks, an undermining of the chain of command, distraction from duties, the perception that police resources were not being applied with equity—these were all cited by the DOJ as directly attributable to some extent to an informal, decentralized police detail system. The City nonetheless understands that the details paid for by private interests

helped make it possible for New Orleans to grow into the world-class event destination for which it is internationally recognized. Privatelyfunded details kept police officers on the street, always policing and always responding for the public good, in numbers greater than provided for by the public funding of the Department. The



consent decree laid out a bold plan of reform that could preserve the best of what police details had enabled in New Orleans.

Our challenge, then, can be summarized in the question that we have sought to answer since before our organization was established: How do we create a system that meets the many reform requirements of the consent decree, provides a great service at a competitive price and great value to customers, maintains police officers' opportunities to make extra income while serving both private and public interests, helps rebuild trust in the police department, and in doing so generates enough revenues for the City to cover the operating expenses of the program and shield taxpayers from bearing this cost? Because of the partnership and good faith of citizens, non-profits and businesses, city and police leaders, and the officers who work the streets serving our city every day, we are proud to say that this system is working. There is still considerable work to do. We have challenges every day, and sometimes we make mistakes, but the numbers speak for themselves.

Customers are hiring detail officers through OPSE at a rate that appears to be greater than before police detail reform was initiated, and they are doing so with the confidence that there's one system that's transparent, accountable, and monitored. Officers who choose to work off-duty details benefit from a fair and easy system that enables them to offer their professional services at a very competitive rate in a way that lets them focus on their job. Change has not always been easy, but we are committed to ensuring that this reform effort is sustained for the benefit of our police department and our city.

History

16 March 2011	The US Department of Justice Civil Rights Division publishes its "Investigation of the New Orleans Police Department"
24 July 2012	US Attorney General Eric Holder and New Orleans Mayor Mitch Landrieu unveil the most extensive police consent decree in history, and the first and only one to address police officers' off-duty work
September – October 2102	OPSE staffing begins with the hiring of key staff positions
11 January 2013	US District Court Judge Susie Morgan signs the consent decree. One-year clock starts for implementation of police secondary employment reforms.
February 2013 – January 2014	Review of legal requirements and policy decisions made regarding payroll taxes, worker's compensation, and liability
July 2013	Hiring of OPSE operations staff begins
8 August 2013	City Council passes two ordinances on police secondary employment: price/fee/pay schedule and other policies , and establishment of OPSE enterprise fund . This establishes legal authority for OPSE to begin operations.
28 August 2013	OPSE operational pilot phase begins with management of first details
21 September 2013	First secondary employment payroll through city's payroll system

October 2013	Operations staff hiring complete. OPSE fully staffed at initial staffing level of nine, including: director, marketing coordinator, DBA/finance specialist, operations supervisor, and five secondary employment coordinators
October 2013	SMG—the management company for the Mercedes-Benz Superdome, Smoothie King Center, and Champions Square—and the city begin negotiations to set specific terms for NOPD officers' secondary employment at SMG facilities
17 December 2013	OPSE and NOPD policies are published, establishing the policy foundation for operations
2 January 2014	Five-stage implementation plan begins, requiring OPSE to assume management of existing permanent, time-based details over the course of several months.
10 January 2014	Deadline for all officers to register with OPSE to be eligible to work any detail
April – August 2014	Initial enforcement efforts to identify and enroll or shut down permanent, time-based details at businesses that did not self-identify as using NOPD officers for their detail or did not initially respond to OPSE communications during the 5-phase implementation period
7 April 2014	Civil lawsuit attempting to halt the implementation of police detail reforms, <u>Powers et al. v</u> <u>New Orleans City</u> , is <u>dismissed with prejudice</u> , freeing OPSE to continue implementing the consent decree's reforms.
July 2014	OPSE successfully manages police details for its first major special event, the Essence Festival.
25 July 2014	Court issues modification to consent decree, setting a new secondary employment pay and pricing schedule to better match market forces. Officer bonus and large customer rebate programs established. Memorandum of Understanding (MOU) with SMG finalized and signed, establishing special terms with the largest police detail employer.
14 August 2014	Saints season begins. Police details for home games begin under OPSE management in accordance with July 25 th , 2014 MOU.

Driving Change

The City of New Orleans now goes further than any municipality in the country in centralizing and regulating its police secondary employment system, and these reforms have taken root. We've instituted new processes that make monitoring and managing the work easier, more uniform, fairer, and more transparent. Officer policy compliance is centrally monitored and violations are communicated with NOPD command staff. While OPSE will administratively suspend detail working privileges for officers violating policy, we make every effort to assist officers to conform to the new rules and requirements. Likewise, we work hard to communicate to all customers the new program requirements to make compliance easy and convenient.

New process for officers: OPSE administers all police secondary work¹

Officers no longer directly coordinate their secondary employment with employers or through other police coordinators. OPSE administers the program including scheduling, tracking, invoicing, receiving payment, paying officers, keeping records, and monitoring compliance. The new process for officers is:

- Officers obtain permission to work secondary employment through their chain of command and renew that permission annually
- Officers register with OPSE
- OPSE posts secondary employment opportunities in its cloud-based scheduling system
- Registered and approved officers can review the available jobs online at their convenience and, if interested, sign-up to be considered for a particular job or jobs
- As the first shift of the job approaches, OPSE staff closes the job and the software prioritizes signed-up officers according to secondary employment hours already worked. The officer with the fewest year-to-date hours and the right skill set is scheduled for the shift.
- OPSE coordinator manages the scheduling and execution process, including making substitutions or accommodating customer changes
- Officer works the shift and records his or her time worked
- Customer verifies officer's work times and sends verification to OPSE coordinator
- OPSE staff reconciles time scheduled versus time worked and loads verified times into the schedule software. Payroll is tallied by generation of custom reports at the end of the pay period. OPSE formats data and transmits secondary employment payroll information to the City of New Orleans Department of Finance for payment.
- Officer is paid on his or her City paycheck² every other Friday. Payroll taxes are automatically deducted and tracked across the year. Tax documentation issued at the completion of the year on one City of New Orleans IRS Form W-2.
- OPSE issues supplemental, itemized earnings statements for secondary employment pay after each 2-week pay period
- OPSE monitors each officer for compliance with daily and weekly work limits, attendance at assigned jobs, performance and customer service, and currency of chain of command work authorization forms

New process for customers: One office handles all coordination and payments

Customers now have one place to go for all their police detail needs, and while policies and procedures are standardized, customers have several pricing options so that the cost of the service is both competitive and market-driven. They may request a detail day or night via our web site or may speak to someone in our office, which is staffed in City Hall even during the peak evening and night hours. The new process for customers is:

¹ Some details requiring moving elements, including second lines, parades, mini-parades, police animals, or other specialized skills or equipment are not yet managed through OPSE. Administration of these details will be transitioned to OPSE in late 2015 or early 2016, under the supervision and monitoring of the Court through the NOPD Consent Decree Monitor.

² NOPD Reserve Division officers are not paid employees of the city and cannot be paid through the city's payroll system. Reserve officers are paid on the same schedule, but through the city's vendor payment system.

- Customers contact OPSE by phone, email, or web form to express initial interest
- OPSE coordinator calls customer to verify eligibility, determine needs, explain the process, and confirm the customer's requirement. Coordinator communicates with NOPD and/or the One-Stop permitting shop as necessary, and emails the customer a confirmation of the requirements, a customer agreement to be signed, and the OPSE policy book.
- Customer returns the signed agreement.
- New, one-time customers pay in advance; existing customers or those with recurring details are invoiced after the job or pay period as applicable.
- Coordinator posts the job as available to registered & approved officers and ensures the job is filled with qualified officers
- Coordinator confirms with the customer the officers assigned to the shifts
- Officers work the shifts. Customer ensures officers record their hours worked. Customer calls the OPSE coordinator with any issues or concerns.
- Customer verifies officer timekeeping and sends the timesheets to OPSE
- Customer may pay electronically (ACH or credit card) by clicking a link in the invoice, or may mail or deliver a check or money order for payment.
- OPSE reconciles payments with time worked
- OPSE receives payment, applies it to the appropriate account and job, prepares the
 accounting trail, and deposits the funds into OPSE's enterprise fund through the Department
 of the Treasury
- OPSE monitors customer accounts to ensure payment is received for all services rendered
- OPSE conducts account audits as required
- Customers may provide feedback to OPSE at any time, and are asked to evaluate their service through an online customer service survey. Survey results are published in the City of New Orleans quarterly ResultsNOLA report.

2014-2015 Milestones

1 September 2014	All remaining permanent time-based details transitioned to OPSE
November 2014	Monthly aggregate detail hours worked through OPSE reaches pre-2011 levels (before the DOJ investigation and subsequent reforms) for the first time
December 2014	OPSE proposes a plan to the DOJ to assume management of all motorcycle escort details
March 2015	French Quarter Supplemental Security Patrol (aka the "French Quarter Task Force") begins as a paid detail through OPSE, funded by the French Quarter Management District, a political subdivision of the state, and private sources

April 2015	OPSE manages police details for French Quarter Festival and the New Orleans Jazz and Heritage Festival, two of the largest recurring annual events in New Orleans. OPSE's gross revenues exceed \$1,000,000 for the month of April, with 92% of it paid to officers.
July 2015	OPSE management of motorcycle escort details begins
July 2015	OPSE's staffed business hours expand to Monday through Friday 8:30 am to 11:00 pm. Other hours covered by on-call staff.

Major Accomplishments

Progress has been tracked through several work streams: policy & procedures, operations, tools, and outreach.

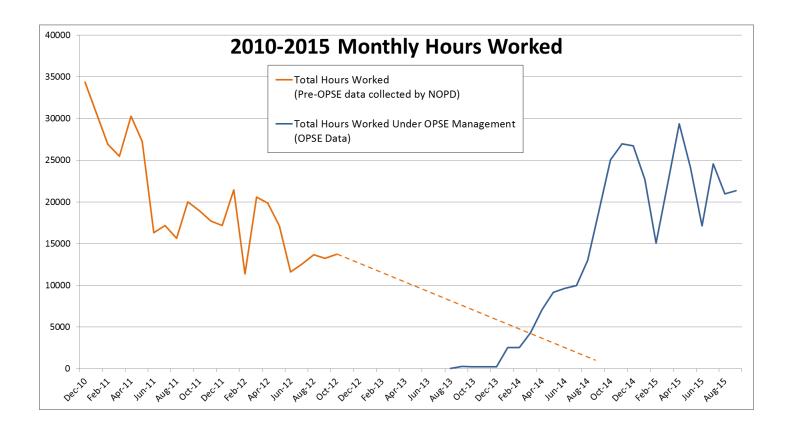
Creating and Synchronizing Policies and Procedures

- Extensively researched the policies of dozens of other law enforcement agencies, including internationally-established best practices
- Developed a policy and procedures booklet for customers and officers, ensuring it comports
 with all requirements and prohibitions of the consent decree, and then aligned it with new
 NOPD policies. Published to all officers in December 2013.
- Introduced and worked with City Council and the mayor to adopt a set of ordinances that
 defined terms and set pay policy in accordance with the consent decree and consistent with
 existing law
- Shared OPSE's policies and procedures with public safety agencies in Detroit, Kansas City, Boston, Miami, Norfolk, and other police departments that have sought our help in improving their own operations

Implementing Operations

- After a successful initial pilot program in the fall of 2013, broad implementation of the new
 procedures began on 6 January 2014. By 1 September 2014, management for all existing and
 new time-based details had been assumed by OPSE as the sole authorized manager of police
 secondary employment for New Orleans Police officers. At the conclusion of the first year of
 full implementation, as of 31 August 2015:
 - 844 NOPD members were registered with OPSE and approved to work secondary employment (71% of total NOPD active and reserve officer strength)
 - 813 officers had worked jobs under OPSE management (69% of total NOPD active and reserve officer strength)
 - 968 unique customers were served, including 88 current customers with regular, recurring details
 - Major special event security has been successfully managed by NOPD officers through OPSE in 2014 and 2015
 - Essence Festival 2014 and 2015
 - Satchmo Summerfest 2014 and 2015

- New Orleans Saints 2014 and 2015 season (in-progress)
- New Orleans Pelicans 2014-2015 season
- Tulane football 2014 and 2015 season (in-progress)
- The 2014 Bayou Classic
- The 2015 Sugar Bowl
- The 2015 French Quarter Festival
- The 2015 New Orleans Jazz and Heritage Festival ("Jazz Fest")
- Numerous concerts and major events held at the Mercedes-Benz Superdome, the Smoothie King Center, the UNO Lakefront Arena, the Saenger Theater, the Mahalia Jackson Theater, and other major venues across the city
- NOPD officers worked over 283,000 hours of secondary employment through OSPE in the last year, including reaching a monthly aggregate total of about 27,000 hours in November 2014, December 2014, and April 2015. This equals the monthly volume officers worked in early 2011, before paid detail reforms were announced and implemented. When considered on a per capita basis (NOPD is about 25% smaller today), officers are working more details now than ever before, but they are managed, monitored, regulated, and standardized.



Acquiring and Integrating Tools

 Procured and implemented the use of web-based scheduling software that allows a small number of OPSE civilian staff to coordinate police secondary employment jobs on behalf of NOPD officers and customers, work that previously required the time and attention of

- hundreds of officers. The software makes it easy for officers to review and express interest in the jobs they wish to work, and for those jobs to be assigned in a fair and equitable manner.
- Developed in-house automation tools to register officers and communicate with customers through web interfaces
- Through in-house custom programming, integrated nine separate enterprise, commercial-offthe-shelf, custom-developed, or existing main-frame automation systems to manage the necessary scheduling, timekeeping, and financial transactions in accordance with the consent decree and existing law

Reaching Out

- Established the office's City web site, <u>nola.gov/opse</u>, and kept it updated with the most current information relating to the new police secondary employment program. Every document related to police secondary employment in New Orleans, including copies of the consent decree, court orders, reports of the consent decree monitor team, briefings to City Council, policies, and updated information, is published on OPSE's web site, in keeping with the office's commitment to transparency.
- Designed and launched <u>HireNOPD.com</u>, where customers can conveniently request a police detail at any time
- Initiated a simple, web-based customer feedback mechanism, including use of the Net Promoter Score (NPS) management tool widely used in private industry to gauge customer loyalty. OPSE's NPS for 2014 was 73, suggesting outstanding prospects for growth and profit. For comparison, OPSE's 2014 NPS score is higher than Amazon.com (NPS of 64) and Southwest Airlines (NPS of 62).

Helping Officers

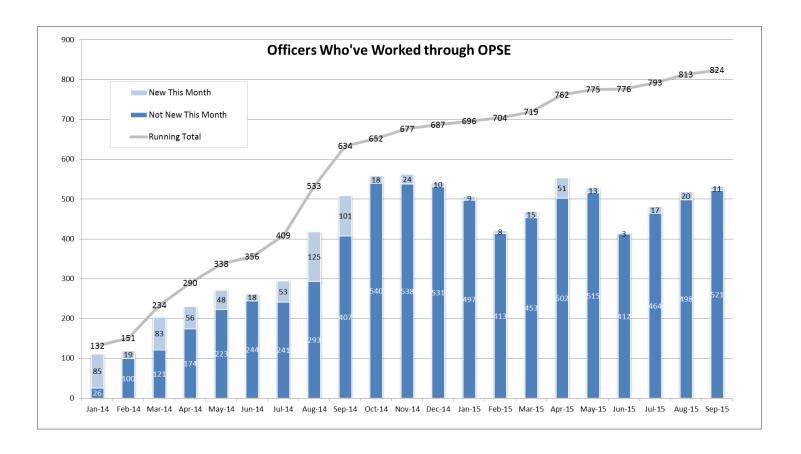
One of OPSE's ongoing imperatives is to ensure officers continue to have the ability to supplement

their incomes. After the DOJ's investigation of the Department, it was a real possibility that private police details could be altogether prohibited by court order. Given the reliance of many officers on their secondary employment income, and the fact that many businesses and organizations depend on these officers to ensure the smooth and successful execution of their operations, reforming—and not eliminating the police detail system was the right solution for our city. In the last year, not only has the city approved a 15% pay raise for



officers, but those who work paid details through OPSE have seen a more than \$5 per hour increase in the average detail pay. And making it easy for officers to work has been a key element in gaining strong officer participation. Half of the department's officers work a detail at least once a month through OPSE, and hundreds work several times per week. In order to encourage officers to participate in the reformed secondary employment program, over the last year OPSE has awarded over \$173,000 in bonuses to the officers who work most often, most reliably, and within policy. This bonus comes out of the administrative fee OPSE is required by the consent decree to charge, and so it does not increase the cost to the customer, but it gives officers an additional incentive to work consistently.

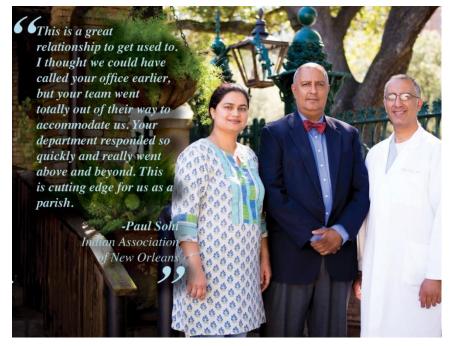
The process for officers to register and sign up for details has been fully automated, but OPSE coordinators still communicate daily with officers to respond to the inevitable changes to schedules and availability that is inherent in doing police work. We make every effort to ensure officers have a great experience working secondary employment through our office.



Serving Customers

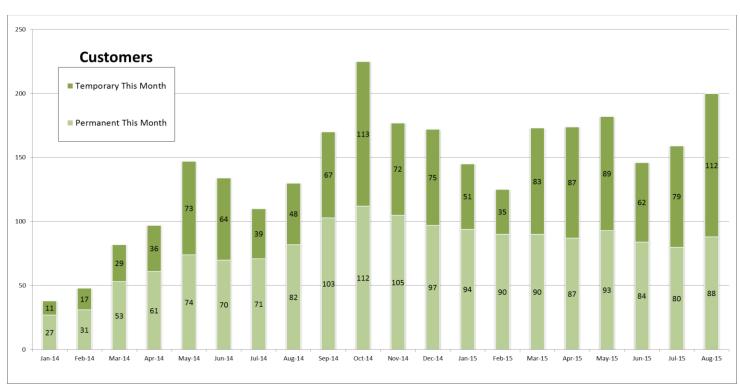
Police officers, by the nature of their oath and commission, protect and serve the public 24 hours a day, 7 days a week. They are required to act when they encounter a crime or a matter of public safety, whether or not they are officially on duty. For this reason, when a private business, organization, or individual hires an off-duty NOPD officer, the community benefits. That officer is present, in uniform, connected to the police communications network, and available to respond to

any emergency in the area. So ensuring customers can continue to hire off-duty officers is the second and related ongoing imperative of OPSE. Customers have an easy and consistent process now for hiring officers. There is one place to contact if they want to hire an officer, and they can do it at any time of the day or night. By submitting a request through OPSE's customer web site,



HireNOPD.com, a job request is generated and an OPSE coordinator follows up within 24 hours. All jobs are conducted according to a set of policies that is distributed to every customer and available online. Pricing is both flexible but consistent. Customers select one of several different pricing tiers, ensuring that the large variability in price from customer to customer that previously existed is now reduced, while maintaining the necessary flexibility for a customer to price a job in a

way that responds to the market and the requirements of the job. And to further enhance our ability to provide responsive, personal service to our customers, in July we expanded our staffed business hours. Our office in City Hall is now staffed from 8:30 am to 11:00 pm weekdays, with staff members on call all other times to respond to customer needs.



The Way Forward

While we have come a long way in the last year, significant work remains. In the coming year, we will transition from the processes that were necessary to start a new division and a new program from scratch to ones that are sustainable, able to withstand changing market conditions, and poised to endure beyond the end of the consent decree. With that in mind, our goals for the next year are:

- Strengthen the organization and practices of OPSE so as to increase resilience to unforeseen conditions. This includes further automating processes, refreshing standard operating procedures (SOPs) and policies, and improving the internal and external user experience with our scheduling and management software.
- Continue to improve efficiency and responsiveness to officers in order to maximize officer participation and ensure that customer demand does not outstrip officer supply
- Strengthen existing customer loyalty and gain new clients by continuing to improve the service provided
- In conjunction with the NOPD, the DOJ, and the consent decree monitor, develop procedures to manage the remaining categories of task-based details without disrupting current operations. This will affect all second lines and parades, road races, as well as K-9, mounted, and other special skill jobs.
- Demonstrate and sustain compliance with all consent decree requirements
- Operate a lean but effective organization so as to minimize cost to customers, maximize
 wages paid to officers, and cover operating costs without relying on financial supplements
 from the City of New Orleans General Fund

Financial Overview

Among the most challenging of OPSE's strategic goals has been the effort to cover our costs. The consent decree made this explicit, prescribing, "[a] schedule of fees will be established by the City to offset costs associated with the coordination and required support provided through the Coordinating Office [OPSE]" (CD 348). This self-sufficiency mandate is perhaps the ultimate benchmark by which OPSE's success can be judged. To generate enough revenues to cover costs, OPSE has to have customers and officers who are satisfied. This has been no easy task, and it is not an effort that is ever complete. But the results from 2014 were encouraging, and 2015 is looking to be even better.

During the 2014 budget hearings before the City Council, we projected the total cost of operating the office, including personnel costs (staff payroll + fringe benefits) and other operating costs (office expenses, software system contract), as \$917,381. By year's end, through just-in-time hiring and

conservative spending, OPSE's costs were kept to \$790,322, a full 14% under budget. Net revenue generated during this initial startup year was \$501,293. This means that in our startup year, as we gradually assumed responsibilities for the various types of details between January and September, OPSE came within less than \$289K of reaching self-sufficiency. By the end of 2015, we will get even closer to realizing this goal. To date in 2015, OPSE is within \$100k of breaking even. The overlapping New Orleans Saints, New Orleans Pelicans, and Tulane University football seasons, coupled with an increased number of festivals and special events through the end of the year, represent the high season for us. While there are several months before year-end revenues will be finalized, given the increased volume of work between September and year's end, the outlook for annual net revenues in 2015 is promising.

Consent Decree Required Data

This data satisfies the requirement to annually release to the public the below information in accordance with consent decree paragraph 349^3 . All data is for the one-year period of 1 September 2014 - 31 August 2015:

The number of NOPD employees⁴ who worked secondary employment by district/division and rank:

Number of N	Number of NOPD Officers Who Worked Secondary Employment Under OPSE Management, Sep 14- Aug 15										
NOPD Bureau/District/Division	Commander	Major	Captain	Lieutenant	Sergeant	PO IV	PO III	PO II	PO I	Civilian	Total
1st District				2	9	9	12	3	3		38
2nd District	1			3	8	14	12	5	7		50
3rd District	1		1	2	8	9	10	7	5		43
4th District				3	12	12	9	7	9		52
5th District	1			3	8	18	12	8	8		58
6th District				3	3	16	13	1	8		44
7th District				2	6	10	8	8	10		44
8th District	1			4	18	21	21	5	8		78
Special Operations Division	1		1	3	12	24	18	2	2	1	64
Reserve Division	1		3	4	9	13	3	1	8		42
Field Operations Bureau Other			3		3	2	3		5	17	33
Compliance Bureau										1	1
Public Integrity Bureau				5	7	2					14
Investigation & Support Bureau	2		1	11	24	59	27	7	3		134
Management Services Bureau	1		1	1	9	22	8	3	4	5	54
Office of the Superintendent		·	•	2	10	11	1			1	25
Total by Rank	9	0	10	48	146	242	157	57	80	25	774

³ These figures are compiled as of 31 August 2015 based on the rank and unit of assignment reported by each officer on his or her registration and authorization form as submitted to OPSE. These forms are updated yearly by officers in their birth month, and so the current forms on file were submitted in 2014 or 2015. If an officer's unit of assignment or rank changed over the course of the year, the officer's full-year data is counted under his or her rank and unit of assignment as last reported on this registration form.

⁴ A small number of civilian NOPD employees work details in administrative or support roles during major special events such as Jazz Fest and French Quarter Fest. These employees support the large contingent of detail officers by processing assignment data, troubleshooting and repairing radios, controlling communications networks, etc.

The average number of secondary employment hours worked by district/division and rank:

Average Number of Secondary Employment Hours Worked Under OPSE Management, Sep 14 - Aug 15 By District/Division and Rank										
NOPD District/Division	Commander	Major	Captain	Lieutenant	Sergeant	PO IV	PO III	POII	POI	Civ
1st District				100	299	293	257	257	71	
2nd District	181			220	680	243	177	249	195	
3rd District	1033		133	240	365	429	563	586	280	
4th District				374	446	595	426	387	190	
5th District	132			372	876	368	513	388	99	
6th District				252	622	446	436	907	56	
7th District				92	383	341	346	132	273	
8th District	130			304	321	308	341	347	186	
Special Operations Division	169		1297	207	588	274	321	152	968	213
Reserve Division	348		300	111	181	371	66	455	174	
Field Operations Bureau Other			288		1093	649	643		108	18
Compliance Bureau										70
Public Integrity Bureau				453	518	547				
Investigation & Support Bureau	37		76	460	477	412	440	461	418	
Management Services Bureau	145		673	165	635	414	365	195	318	61
Office of the Superintendent				475	529	519	340			89

The salaries of Coordinating Office employees:

Salaries of OPSE Employees, Sep 14 - Aug 15					
Role	Class Title	Salary			
Director	Unclassified	\$119,031			
Operations Supervisor	Police Secondary Employment Management Supervisor	\$74,528			
Database Administrator/Finance	Information Technology Specialist III	\$67,477			
Marketing Coordinator	Marketing Development Coordinator	\$62,631			
Coordinator (Major Special Events)	Police Secondary Employment Coordinator Analyst II	\$44,794			
Coordinator	Police Secondary Employment Coordinator Analyst II	\$42,265			
Coordinator	Police Secondary Employment Coordinator Analyst II	\$39,845			
Coordinator	Police Secondary Employment Coordinator Analyst II	\$40,043			
Coordinator	Police Secondary Employment Coordinator Analyst II	\$41,024			
Coordinator (Evening Shift)	Police Secondary Employment Coordinator Analyst II	\$12,587			

The Coordinating Office's administrative operational costs:

OPSE Administrative Operating Costs, Sep 14 - Aug 15						
Personal Services (Payroll + Fringe)	\$747,573					
Other Operating (Office Expenses)	\$71,881					
Total	\$819,454					

The net and gross amounts of City income derived through secondary employment:

Sep 14 - Aug 15 OPSE Gross and Net Revenues							
Billed to Customer (Gross Revenues) \$ 8,678,979.50							
NOPD Employee Detail Pay (Cost of Goods Sold) \$ 7,514,475.0							
Administrative Fee Income (Net Revenues) \$ 1,164,504.42							

Sep 14 - Aug 15 OPSE Operating Income									
	Sep 14 -	Dec 14-	Mar 15 -	Jun 15 -	Total				
	Nov 14	Feb 15	May 15	Aug 15	TOtal				
Net Revenue	\$299,290.94	\$270,060.68	\$323,135.71	\$272,017.09	\$1,164,504.42				
Office Operating Expenses	\$185,428.60	\$211,459.24	\$193,606.78	\$228,959.61	\$ 819,454.23				
Customer Rebates	\$68,031.35	\$60,371.00	\$72,252.08	\$60,631.28	\$ 261,285.71				
Officer Bonuses	\$43,304.55	\$41,243.34	\$51,224.45	\$38,037.28	\$ 173,809.62				
Operating Income	\$2,526.44	(\$43,012.90)	\$6,052.40	(\$55,611.08)	(\$90,045.14)				