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## **INVESTIGATION REPORT**

**TO:** Board of Township Trustees, Etna Township, Licking County, Ohio  
**FROM:** Carly M. Sherman, Esq.  
**RE:** Unauthorized Access of Etna Township Bank Account  
**DATE:** July ~~13~~23, 2025

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I am an attorney with Bricker Graydon LLP—a law firm with one of the largest public sector practice groups in Ohio, representing more than 1,000 political subdivisions across the State. The Etna Township Board of Township Trustees engages Bricker Graydon on an as-needed basis to perform various legal services for the Township in an outside-counsel capacity. The Board of Trustees recently asked Bricker Graydon to investigate an incident that occurred on November 1, 2024, involving an unauthorized individual accessing the Township’s public funds checking account (the “Account”) held by Park National Bank (“PNB”)<sup>1</sup> (the “Incident”). Bricker Graydon was specifically asked to: (1) identify the individual who accessed the Account; and (2) determine how that individual was able to access the Account.

I performed the requested investigation. Based on my interviews with past and present Township officers and employees with first-hand knowledge of the Incident, and my review of various records provided by interviewees or otherwise maintained by the Township, the following are my general conclusions: (1) prior Etna Township Fiscal Officer, Julie Varian is the individual who accessed the Account on an unauthorized basis on November 1, 2024; and (2) Ms. Varian was able to access the Account because her remote Account access credentials with PNB were not timely deactivated following her departure from Township office. It is undisputed that Ms. Varian did not effect any transfer of funds to or from the Account, or otherwise tamper with funds within the Account, and there is no indication or evidence to suggest that Ms. Varian accessed the Account with any malicious or criminal intent.

This Report provides the following information and recommendations:

- An overview of the Fiscal Officer’s duties with respect to maintenance and payment of Township funds, according to relevant Revised Code provisions and Township policies;
- An overview of relevant PNB remote banking procedures and applications;
- A list of all individuals interviewed as part of the investigation;

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<sup>1</sup> 350 E. Broad Street, Pataskala, Ohio 43062.

- A timeline of events leading up to the Incident, and immediately following the Incident;<sup>2</sup>
- A summary of security, procedural, and/or policy issues I identified over the course of the investigation, and which I believe facilitated the Incident in some way;
- A list of recommended action items to be completed, and policies to be implemented, to prevent similar incidents from occurring in the future; and
- An Appendix containing certain tangible records referenced throughout this Report.

#### **I. Overview of Fiscal Officer Duties Regarding Administration of Township Accounts and Expenditures of Public Funds.**

The fiscal officer is an elected position within a township. The fiscal officer generally holds office for four (4) years, commencing on April 1<sup>st</sup> immediately following the election at which the fiscal officer was voted into office.<sup>3</sup> The fiscal officer is primarily responsible for the proper administration and expenditure of township funds by, among other things, issuing warrants, signing checks and other expenditure orders, and maintaining accurate records of all township accounts and transactions.<sup>4</sup> The fiscal officer is further responsible for ensuring the township's annual financial report is properly prepared and filed with the Auditor of State at the end of each fiscal year, in accordance with all Auditor of State requirements.<sup>5</sup> The fiscal officer is entitled to hire and compensate assistants (including a deputy fiscal officer) to assist in the discharge of the fiscal officer's official duties.<sup>6</sup> Although the fiscal officer has oversight and control of township funds, he/she is not personally liable for a loss of public funds unless it is shown that a loss results from the fiscal officer's negligence or willful misconduct.<sup>7</sup>

Township funds may only be paid out upon an order signed by at least two (2) township trustees, and countersigned by the fiscal officer.<sup>8</sup> The township trustees may resolve to pay any township obligation electronically, via direct deposit of funds into an account designated by the payee for acceptance of such funds.<sup>9</sup> Each such direct-deposit transaction must be approved the board of trustees, and the fiscal officer

<sup>2</sup> Facts set forth in this Report have generally been confirmed by at least two (2) credible sources (e.g. multiple interviewees and/or verifiably accurate records). To the extent any information herein could not be verified by multiple sources, or represents the opinion or perception of a particular interviewee, I have attributed the information to the particular interviewee from whom it was obtained.

<sup>3</sup> R.C. 507.01.

<sup>4</sup> See R.C. Chapter 507.

<sup>5</sup> See R.C. 117.38.

<sup>6</sup> R.C. 507.021(A).

<sup>7</sup> R.C. 507.14.

<sup>8</sup> R.C. 507.11(B)(1).

<sup>9</sup> R.C. 507.11(B)(2); R.C. 9.37.

must ensure a warrant is issued against the proper fund and sufficient funds are appropriated to account for the expenditure.<sup>10</sup>

Section 3.1 of the Etna Township Personnel Policies and Procedures Manual (the “Township Manual”) requires the Fiscal Officer to prepare Township employee payroll. Etna Township employees are paid on a bi-weekly basis, based on an eighty (80) hour period (excepting part-time, seasonal, temporary, and salaried employees). A time sheet reflecting each employee’s hours worked in a given pay period is signed by the employee and his/her supervisor or department head, and then submitted to the Fiscal Officer for review and payment. The Etna Township Board of Trustees reviews and approves payroll expenditures in the ordinary course of Township business during regular public meetings of the Board. The Fiscal Officer conducts a final verification of the accuracy of each timesheet and then schedules with PNB an electronic funds transfer (“EFT”) from the Account to directly deposit each employee’s pay into his/her personal bank account.<sup>11</sup> The Fiscal Officer also prepares and releases a once-monthly EFT to pay each Township Trustee via direct deposit to their personal bank accounts.

## **II. Overview of PNB Remote Banking Procedures and Applications.**

PNB is a depository of public funds, certified by the Ohio Treasurer’s Office.<sup>12</sup> Each public entity utilizing PNB’s banking services has its own, unique Company ID with the bank. A public entity may designate one or more individuals to act as the entity’s authorized agent for purposes of accessing public accounts held by PNB. Each authorized agent is assigned his/her own individual User ID. An authorized agent may remotely access (e.g. without physically visiting a bank location) his/her entity’s public bank account, and funds therein, using PNB’s business banking software.<sup>13</sup> Remote access allows users to view their account statements and complete account transactions using: (1) a desktop browser accessible by computer, tablet, or other device with internet access (the “Desktop Application”); and/or (2) a mobile banking application which may be downloaded to a cell phone, tablet, or other mobile device capable of storing such applications (the “Mobile Application”).<sup>14</sup>

### **A. Desktop Application Registration and Use.**

When an authorized agent accesses the Desktop Application for the first time, both the Company ID and User ID must be entered, along with a temporary password provided by PNB. Upon initial login, the user is required to change the temporary password. The user is also prompted to select a “verification image” from a list of pictures shown on the Desktop Application screen, and to type in a specific “verification

<sup>10</sup> See R.C. 507.11; see also R.C. 9.37.

<sup>11</sup> These steps satisfy the electronic public expenditure requirements set forth in R.C. 507.11 and 9.37.

<sup>12</sup> See <https://www.tos.ohio.gov/financial-institutions-and-investors/>.

<sup>13</sup> See <https://parknationalbank.com/business/manage/public-funds/>.

<sup>14</sup> PNB Business Online Banking informational guides for both the Desktop Application and the Mobile Application are attached to the Appendix.

phrase” in connection with the image. This completes the initial Desktop Application setup process. Each time the user subsequently logs into the Desktop Application, the user must provide his/her unique User ID and password, and confirm the accuracy of the verification image and phrase. The Desktop Application password must be changed at least once every six (6) months.

### **B. Mobile Application Registration and Use.**

The Mobile Application may be downloaded on the user’s device from the Apple Store or Google Play Store. An “activation key” provided by PNB must be entered on the application home screen to begin the Mobile Application registration process. The user is then prompted to create a unique “PIN” that complies with PNB’s security requirements (the user’s PIN need not match the user’s Desktop Application password). Submission of the PIN prompts PNB to send a “verification code” to either the user’s email or phone number on file with PNB (at the user’s election). The user enters the verification code in the Mobile Application to complete the registration process. Only the PIN is generally required to log into the Mobile Application on that particular device following initial registration.

### **III. Individuals Interviewed in Connection with the Investigation.**

The following is a complete list of Township officers and personnel I interviewed as part of the investigation:

- Gary Burkholder, Etna Township Trustee: Mr. Burkholder presently serves as the President of the Board of Trustees. He was elected on November 7, 2023 and took office on January 1, 2024. His term in office expires on December 31, 2027. Mr. Burkholder is an authorized signer on the Account. He has the ability to request and receive information and records from PNB related to the Account, but does not have any other banking access or transaction capabilities (remote or otherwise).
- Rozland McKee, Etna Township Trustee: Ms. McKee presently serves as the Vice-President of the Board of Trustees. She was elected on November 2, 2021 and took office on January 1, 2022. Her term in office expires on December 31, 2025. Ms. McKee is an authorized signer on the Account. She has the ability to request and receive information and records from PNB related to the Account, but does not have any other banking access or transaction capabilities (remote or otherwise).
- Mark Evans, Etna Township Trustee: Mr. Evans presently serves as a Township Trustee. He was elected on November 2, 2021 and took office on January 1, 2022. His term in office expires on December 31, 2025. Mr. Evans is an authorized signer on the Account. He has the ability to request and receive information and records from PNB related to the Account, but does not have any other banking access or transaction capabilities (remote or otherwise).

Jacqueline Cotugno, Etna Township Fiscal Officer: Ms. Cotugno presently serves as the Township Fiscal Officer. She was elected on November 7, 2023 and took office on April 1, 2024. Her term in office expires on December 31, 2027. Ms. Cotugno is primarily responsible for all Township funds and banking transactions. Upon taking office, the Board of Trustees designated Ms. Cotugno as the Township's authorized agent for purposes of accessing all Township accounts, and transferring Township funds, held by PNB (including but not limited to the Account).<sup>15</sup> Ms. Cotugno established her own unique User ID, password, and PIN with PNB to utilize PNB's remote banking services. Ms. Cotugno's User ID at all times relevant to this investigation was "JCOTUGNO4948" and the email address tied to her User ID was [jackiecotugnoetnafo@gmail.com](mailto:jackiecotugnoetnafo@gmail.com). No other Township officer or employee has banking credentials, capabilities, or access rights with respect to Township accounts held by PNB.<sup>16</sup>

- Don Copley, Etna Township Road Superintendent: Mr. Copley presently serves as the Township Road Superintendent. He is responsible for overseeing the Road Department and its personnel. Road Department duties largely entail day-to-day maintenance of Township rights-of-way and public grounds. As a department head, Mr. Copley is responsible for reviewing and signing off on all Road Department personnel time sheets, and submitting the sheets to the Fiscal Officer for payroll disbursement.
- Julie Varian, Prior Etna Township Fiscal Officer:<sup>17</sup> Ms. Varian was the Township Fiscal Officer immediately preceding Ms. Cotugno taking office. She was appointed to the position by the Board of Trustees on January 24, 2022 to fill the unexpired term of the prior Fiscal Officer upon his resignation from office. Ms. Varian's term in office expired on March 31, 2024. In her capacity as Township Fiscal Officer, Ms. Varian previously had authorized access to the Account using her own unique PNB User ID, password, and PIN. Ms. Varian's User ID at all times relevant to this investigation was "JVARIAN5465".

<sup>15</sup> The PNB Entity Authorization form designating Ms. Cotugno as Etna Township's agent for PNB banking purposes (duly executed by Trustee Burkholder on April 1, 2024 in his capacity as Board President) is attached to the Appendix.

<sup>16</sup> Ms. Cotugno stated Holly Palumbo, administrative staff with Etna Township, has the ability to make nominal deposits into the Account (representing Township funds administratively collected in day-to-day Township operations, such as various application fees). Ms. Palumbo does not have any other banking access or capabilities.

<sup>17</sup> Ms. Varian communicated with me on a restricted basis through her attorney, Scott Wood of Conrad/Wood Law. I was able to submit a short list of questions for Ms. Varian to answer, and Attorney Wood provided me with limited responses to such inquiries. This is not a criminal or other official investigation in which Ms. Varian could be subpoenaed or otherwise compelled to participate.

On or about April 1, 2024, Ms. Varian prepared and delivered to Ms. Cotugno the "Certificate of Transition for Etna Township Fiscal Officer," as required by R.C. 171.171 and 503.28.<sup>18</sup> The Certificate provided, or directed Ms. Cotugno to the location of, personal property, records, funds, policies, passwords, and other documents, items, and information pertinent to the performance of the Fiscal Officer's official job duties. Following Ms. Varian's departure from office, she communicated with Ms. Cotugno intermittently to answer Ms. Cotugno's questions and generally ensure a smooth Fiscal Officer transition. Ms. Cotugno stated her communications with Ms. Varian ceased in August 2024.

Trustee Burkholder stated that, at some point following the end of Ms. Varian's term in office, he asked Ms. Varian if she would accept employment with Etna Township as an assistant to the Fiscal Officer (primarily to help prepare the Township budget for fiscal year 2025). Ms. Varian declined the opportunity.

#### **IV. Summary of Events Surrounding the Incident.**

November 1, 2024 represented a regular payday for Etna Township personnel according to the Township's regular bi-weekly pay schedule. This date was also the regular once-monthly payday for all Township Trustees. Ms. Cotugno stated that she approved and scheduled one or more EFTs from the Account to satisfy all payroll obligations due and owing from the Township on November 1, 2024 (the "Payment"). On October 31, 2024 at 12:27 AM, PNB sent a notice to Ms. Cotugno's email on file with the bank. The notice stated the Payment was rejected because it exceeded the Account's permissible per-day ACH fund transfer limits (the then-current limit was \$20,000 per processing day).<sup>19</sup> It appears that certain Township officers and/or personnel timely received their direct deposits, while others did not.

Don Copley stated that he ordinarily receives his bi-weekly direct deposit from the Township at midnight on payday. However, he did not timely receive his payday funds on the morning of November 1, 2024. Mr. Copley called Ms. Cotugno multiple times that morning to inquire about the payroll issue. Ms. Cotugno stated she spoke with Mr. Copley by phone around 8:00 AM. Following that call, Ms. Cotugno scheduled a new EFT to satisfy outstanding payroll obligations at or about 8:56 AM.<sup>20</sup> Township personnel ultimately received their direct deposits for the November 1, 2024 payday throughout the day, with Mr. Copley stating the Road Department was paid by about 5:30 PM that evening.

<sup>18</sup> A copy of the Certificate of Transition is attached to the Appendix. Documents attached to the Certificate have been omitted, as they contain personal employee information, information which could jeopardize Township security, and/or other information that does not constitute a public record under Ohio law.

<sup>19</sup> The October 31, 2024 PNB notice (with a time-stamp of 12:27 AM) is attached to the Appendix.

<sup>20</sup> A copy of the November 1, 2024 PNB notice reflecting the second, pending EFT (with a time-stamp of 8:56 AM) is attached to the Appendix.



Ms. Cotugno stated she contacted PNB when the bank opened on November 1, 2024 (at or about 9:00 AM) to determine why the Payment failed. She was informed the original Payment exceeded the Account's established ACH limits. Ms. Cotugno believes the Payment exceeded the Account's ACH limits because Township payroll obligations were higher than usual on the day in question, since Township Trustee and Township personnel paydays both fell on that day (which Ms. Cotugno understands to be an unusual occurrence). Ms. Cotugno stated she did not see PNB's originally emailed notice regarding the failed Payment because Gmail (the email platform with which Ms. Cotugno maintains her email address on file with PNB) redirected the PNB notice to Ms. Cotugno's email "spam" folder. Ms. Cotugno stated the Account's per-day ACH fund transfer limits have since been raised to \$30,000.

Prior to successful processing of the second EFT Payment scheduled by Ms. Cotugno on November 1<sup>st</sup>, Mr. Copley contacted Trustee Mark Evans about the matter. The gentlemen communicated through text exchange and a brief phone call at or about 1:30 PM that afternoon. Trustee Evans stated he was out of town for work but would attempt to resolve the payroll issue. Trustee Evans thereafter contacted Julie Varian, with the stated purpose of collecting information as to how PNB's ACH payment system operates, and discussing reasons why a scheduled payment would be rejected by PNB. Trustee Evans and Ms. Varian spoke by phone on four (4) separate occasions at 1:39 PM, 2:08 PM, 2:43 PM, and 4:41 PM.

The initial phone call between Trustee Evans and Ms. Varian on November 1, 2024 lasted approximately 11 minutes (ending at or about 1:50 PM) according to cell phone records provided by Trustee Evans. Ms. Varian stated that, during this call, she volunteered that she may still have access to the PNB Mobile Application. She then proceeded, during her call with Trustee Evans, to access the Account remotely by entering her unique User ID and PIN into the Mobile Application installed on her cell phone. Records collected from PNB reflect that Ms. Varian logged into the Mobile Application at 1:38 PM, 1:39 PM, 1:42 PM, and 1:43 PM.<sup>21</sup>

Ms. Varian stated she relayed to Trustee Evans certain Account information visible to Ms. Varian on the Mobile Application platform. Ms. Varian stated she was under the impression that she was impliedly authorized by Trustee Evans to access the Mobile Application because she believed Trustee Evans knew she was accessing the Application and did not object. In contrast, Trustee Evans stated he was not aware that Ms. Varian was accessing the Mobile Application at the time of their phone call, and only later learned that Ms. Varian logged into the Application. [The aforementioned statements in this paragraph and the preceding paragraph of the Report represent Ms. Varian's and Trustee Evans' personal, respective recollections and perceptions of their](#)

<sup>21</sup> Data provided by PNB reflecting Mobile Application and Desktop Application logins with respect to the Account from April 14, 2024 through November 1, 2024 is compiled in spreadsheet format and attached to the Appendix. It appears Ms. Varian's User ID accessed the Account using the Mobile Application once prior to the Incident, on June 16, 2024. I am unaware of the circumstances surrounding the ancillary June 16, 2024 access event.

[phone correspondence; rather than verifiably accurate facts.](#) Both Trustee Evans and Ms. Varian confirmed that Trustee Evans did not request that, or expressly authorize, Ms. Varian remotely access the Account through use of the Mobile Application or otherwise.

On November 4, 2024, Trustee Evans emailed the then-current Township Administrator—Susan Bedsole—about the Incident, with Ms. Cotugno as a copied recipient.<sup>22</sup> The email conveyed information Trustee Evans learned from a PNB representative regarding the rejected Payment and options to ensure future EFTs were properly processed. Trustee Evans stated in his email that the PNB representative notified him that Julie Varian was still listed as a current authorized user with respect to the Township's bank accounts. Trustee Evans advised Ms. Bedsole to take steps to deactivate Ms. Varian's access to the Township's accounts (but cautioned against completely deleting Ms. Varian's User ID because all of her user history would be lost in the process).

Ms. Cotugno stated that Trustee Evans' November 4, 2024 email prompted her to contact PNB and confirm whether a user other than Ms. Cotugno possessed credentials to access the Township bank accounts. While discussing the matter with a PNB representative, Ms. Cotugno was instructed on how to access and review all remote logins to the Account over a specific period of time. Ms. Cotugno stated she thereafter pulled up the Account login history and discovered that Julie Varian's User ID accessed the Account using the Mobile Application on four (4) occasions on November 1, 2024.

Ms. Cotugno later contacted Trustee Burkholder and Trustee McKee<sup>2223</sup> to notify them of the Incident. She also reported the Incident to the Licking County Sheriff's Office on or about November 13, 2024.<sup>2324</sup> Ms. Cotugno stated she was advised by the Licking County Prosecutor's Office that the Incident did not constitute a criminal offense. Ms. Cotugno worked with PNB to deactivate Ms. Varian's User ID, such that she no longer has remote access to the Township's bank accounts. Ms. Cotugno further confirmed that she, in her capacity as acting Fiscal Officer, is now the only past or present Township officer/employee with remote banking credentials and capabilities.

It is undisputed that the Incident did not involve any improper transfer, deposit, or withdrawal of public funds. Nor is there any reason to believe, or evidence to suggest, that the Account was remotely accessed with any criminal or other wrongful intent or purpose.

## **V. Identified Procedural and Security Issues Facilitating the Incident.**

<sup>22</sup> [A copy of Trustee Evans' November 4, 2024 email is attached to the Appendix.](#)

<sup>2223</sup> Trustee McKee stated she first learned of the Incident due to a social media post.

<sup>2324</sup> A redacted copy of the Licking County Sheriff's Office Voluntary Statement Form detailing Ms. Cotugno's report is attached to the Appendix.



The following is a list of procedural and security issues identified over the course of the investigation, which I believe contributed to the Incident:

No Formal Security/Cybersecurity Policies and Procedures: The crux of the Incident is that Julie Varian's access to all Township banking and other financial accounts should have been immediately terminated as of her last day in office. When any Township officer/employee departs from the Township, it is imperative that his/her access to all physical and electronic Township property and assets is terminated. Physical keys, key fobs and access cards must be returned, and passwords turned over, to appropriate Township officers/administrators by the end of the individual's last day with the Township. Etna Township does not appear to have any formal policies, procedures, or checklists governing return of these items by an outgoing officer/employee, or collection of these items by remaining Township personnel. Had such a policy been in place, it is more likely that Ms. Varian's Township banking credentials would have been timely deactivated when her term in office concluded.

- No Formal Township Officer/Employee Email Usage Policy: Ms. Cotugno stated she did not promptly receive PNB's emailed notice regarding the failed Payment because Ms. Cotugno's Gmail account directed the message to her spam folder. It is possible the message would have been received by Ms. Cotugno at an official Township email accounts, had one of these accounts been on file with PNB as Ms. Cotugno's designated address for receipt of email notices. It is best practice (from a security and public records standpoint) for Township officers/employees to refrain from commingling their job responsibilities with personal email accounts. It is recommended that the Township assign only one (1) official Township email address to each officer/employee of the Township, and require all Township officers/employees to conduct official Township business using only their Township-issued email accounts.
- No Formal Fiscal Officer Transition Policies and Procedures: Outside of the comprehensive, Township-wide security/cybersecurity policy, the Incident could have been prevented if the Township had in place Fiscal Officer-specific security policies. One of the first action items to be completed following a Fiscal Officer transition is to ensure the outgoing Fiscal Officer's banking access credentials are deactivated and/or passwords are changed. It is best practice to maintain a formal policy and/or checklist outlining outgoing and incoming Fiscal Officer responsibilities during an imminent transition in office; among which should be ensuring that the outgoing Fiscal Officer's banking access is terminated.
- No Formal Fiscal Officer Accounting and/or Payroll Policies and Procedures: The Incident arises out of a reject payroll EFT on November 1, 2024. This circumstance highlights the absence of formal procedures for monitoring EFTs from Township accounts and/or confirming payroll payments are timely completed. It would be helpful to formally adopt a uniform Fiscal Officer

procedure for ensuring a scheduled EFT is successfully processed (which should aid in more quickly identifying failed EFTs and rectifying the issue before any payment obligation deadlines are missed).

- No Clear Internal Understanding on the Appropriate Chain of Command for Township Communications: The way in which knowledge of the Incident was communicated amongst Township officers and personnel demonstrates a lack of formal or informal chain of command within the Township. It is unusual that delayed payment of payroll was escalated so quickly to the Trustee level—particularly when the Fiscal Officer appears to have promptly taken action to correct the problem. Township Trustees are not generally folded into day-to-day Township management matters like the Incident, except in extreme circumstances (e.g. the Fiscal Officer notifies Township Trustees of a failed EFT due to insufficient, missing, or misappropriated funds). It would be more typical for the Fiscal Officer and Township Administrator (which position was filled at the time of the Incident) to resolve the issue without Trustee involvement.

To streamline internal communications, and eliminate undue confusion and frenzy in the future, it is advisable to establish formal, clear chains of communication for Township issues that may arise. While there is no “one size fits all approach,” the following is a typical chain-of-command structure: Township staff communicates an issue only to his/her immediate superior; when a matter reaches the department-head level, the department head may bring the matter to the attention of the Township Administrator; and the Township Administrator may thereafter escalate the matter to the Township Trustees and/or Fiscal Officer, as necessary to appropriately resolve the matter and keep Township officers reasonably informed.

## **VI. Recommended Steps to Prevent Similar Incidents in the Future.**

The following is a list of recommended policies/procedures and action steps that Etna Township may consider taking to enhance Township security and prevent similar incidents from happening in the future:

- Develop and adopt one or more comprehensive Township security and cybersecurity policies;
- Develop and adopt a Township email usage policy requiring Township officers and employees to conduct all official business using Township-issued email accounts (this may be embedded within a broader security/cybersecurity policy);
- Develop and adopt a Township Fiscal Officer transition policy (with a template Certificate of Transition, and outgoing/incoming Fiscal Officer checklists);
- Develop and adopt one or more policies governing Fiscal Officer accounting, EFTs, and/or payroll accounting procedures;

- Establish, and communicate to all Township personnel, a clear chain of command for escalation of Township issues to the appropriate Township management staff and/or officers; and
- Provide training to Township officers/personnel on all new policies (either a single training encompassing all new policies, or intermittent trainings on a rolling basis as individual policies are adopted).

I suggest each recommended policy be adopted as a standalone policy, rather than a policy made part of the existing Etna Township Personnel Policies and Procedures Manual. These recommended policies will apply to both Township officers and personnel, and the Manual is designed to generally apply only to Township employees (rather than elected officials). Bricker Graydon LLP is happy to assist Etna Township with policy development, review, implementation, and/or training if the Township elects to move forward with any of the above-listed recommendations.

## **APPENDIX**

The following records are attached hereto:

- PNB Business Online Banking informational guides for both the Desktop Application and the Mobile Application
- April 1, 2024 PNB Entity Authorization form
- April 1, 2024 Certificate of Fiscal Officer Transition
- October 31, 2024 PNB notification of failed EFT
- November 1, 2024 PNB notification of pending EFT
- Spreadsheet reflecting all remote logins to the Account between April 14, 2024 through November 1, 2024
- [November 4, 2024 email correspondence from Trustee Evans to Administrator Susan Bedsole](#)
- Redacted copy of the November 13, 2024 Licking County Sheriff's Office Voluntary Statement Form completed by Jacqueline Cotugno.

<b>Summary report:</b> <b>Litera Compare for Word 11.9.1.1 Document comparison done on</b> <b>7/23/2025 3:55:14 PM</b>	
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<b>Modified DMS:</b> iw://bricker-mobility.imatech.com/LEGAL/20667761/2	
<b>Changes:</b>	
<u>Add</u>	15
<del>Delete</del>	9
<del>Move From</del>	0
<u>Move To</u>	0
<u>Table Insert</u>	0
<del>Table Delete</del>	0
<u>Table moves to</u>	0
<del>Table moves from</del>	0
Embedded Graphics (Visio, ChemDraw, Images etc.)	0
Embedded Excel	0
Format changes	0
<b>Total Changes:</b>	24