

**FINANCIAL INDUSTRY REGULATORY AUTHORITY
OFFICE OF HEARING OFFICERS**

DEPARTMENT OF ENFORCEMENT,

Complainant,

v.

KIMBERLY SPRINGSTEEN-ABBOTT
(CRD No. 1367633),

Respondent.

Disciplinary Proceeding
No. 2011025675501

Hearing Officer – LOM

**EXTENDED HEARING PANEL
DECISION**

March 30, 2015

As the general partner of investment funds sold by her broker-dealer firm and sponsored by its parent company, Respondent misused investor funds for three years by improperly allocating expenses to the investment funds that were not related to the funds' business. This was unethical conduct that violated FINRA Rule 2010. Respondent is barred from associating with any FINRA member in any capacity, ordered to pay disgorgement in the amount of \$208,953.75 plus interest, fined \$100,000, and ordered to pay costs.

Appearances

Sean W. Firley and Kevin D. Rosen, Boca Raton, Florida, representing the Department of Enforcement.

Robert Horowitz, Greenberg Traurig, New York, New York, and Steven Felsenstein, Greenberg Traurig, Philadelphia, Pennsylvania, representing Respondent.

I. INTRODUCTION

The Department of Enforcement ("Enforcement") for the Financial Industry Regulatory Authority ("FINRA") brought this disciplinary action against Respondent Kimberly Springsteen-Abbott ("Springsteen-Abbott" or "Respondent") alleging that she violated FINRA Rule 2010. FINRA Rule 2010 requires that a FINRA member (and, in conjunction with FINRA Rule 140, a member's associated persons) "shall observe high standards of commercial honor and just and equitable principles of trade" in the conduct of its business.

Enforcement alleged—and proved—that Springsteen-Abbott purposefully used investor monies as though they were her own, to her personal benefit and to the investors' detriment, and in violation of limitations imposed by the offering documents for the investments. Springsteen-

Abbott plainly failed to observe high standards of commercial honor. In the hope of concealing her misconduct and avoiding regulatory action, she then lied to FINRA staff investigating the matter and later lied to the Extended Hearing Panel regarding the purposes for which she spent the money. This was an aggravating factor. Because the Extended Hearing Panel believes that Springsteen-Abbott is unlikely to comply with industry regulation and ethical standards in the future, it concludes that she should be barred from the industry, as well as ordered to pay disgorgement (along with prejudgment interest), a fine, and costs.

II. SUMMARY

Springsteen-Abbott is an associated person of a FINRA member broker-dealer, Commonwealth Capital Securities Corp. ("Commonwealth" or "Broker-Dealer"), and serves as its Chief Executive Officer ("CEO"), Chairman, and Chief Compliance Officer ("CCO"). Commonwealth is owned (through a holding company) by Commonwealth Capital Corp. ("Parent Company"), which Springsteen-Abbott controls. The Parent Company is the sponsor of private and public investment funds ("Funds"). Another Commonwealth affiliate controlled by Springsteen-Abbott, Commonwealth Income and Growth Fund, Inc., is the General Partner of the Funds ("Funds' General Partner"). Springsteen-Abbott's Broker-Dealer wholesales the Funds to other broker-dealers who sell them to investors.

The Funds invest in equipment leases. Springsteen-Abbott's husband, Hank Abbott, runs the leasing operation.

Springsteen-Abbott, as a control person of the Funds' General Partner, had authority to allocate to the Fund's expenses incurred in operating the Funds' business. The documents creating the Funds expressly limited the expenses that the Funds would bear to expenses incurred in conducting and administering the Funds' business.

Springsteen-Abbott abused her authority by improperly allocating to the Funds two types of expenses that were not related to the Funds' business: personal expenses and Broker-Dealer expenses.

The practice of charging personal expenses to the Funds was a way of life for Springsteen-Abbott and her husband, Hank Abbott. They regularly charged thousands of dollars of personal expenses on the same American Express credit card that they used for business expenses, and then, when she received the monthly American Express bills, Springsteen-Abbott allocated to the Funds many of those personal expenses. The personal expenses improperly charged to the Funds included expenses related to a birthday cruise to Alaska, a Mother's Day meal at Longwood Gardens, a Disney family vacation, a Thanksgiving dinner, a post-Christmas family dinner on a trip to New York, and, on a regular basis, more modest family meals. Springsteen-Abbott also improperly allocated to the Funds expenses for holiday decorations for her home, car rentals for cars that her husband used for personal purposes, clothes, accessories, and pharmacy and grocery expenses.

Springsteen-Abbott provided business justifications to FINRA staff for some of the expenses allocated to the Funds. Many of these business justifications were not credible; others were demonstrably false.

When confronted with evidence that a particular expense was personal and not a business expense, Springsteen-Abbott might concede that it had been improperly allocated to the Funds, but she might not. For the most part, she maintained that the expenses at issue were properly allocated to the Funds, even in the face of evidence inconsistent with her position. She argued that she and her husband worked nearly all the time, and that what appeared to be personal meals were actually business activities because she and her husband routinely carried work with them and discussed it. She also argued that, in any event, investors were not harmed by the misallocation of expenses because she had benefited the Funds voluntarily in other ways.

As for the improperly allocated Broker-Dealer expenses, Springsteen-Abbott acknowledged at the hearing that they should not have been allocated to the Funds. However, she only realized that in the course of the investigation and disciplinary proceeding. Over the three-year period at issue, Springsteen-Abbott did not recognize that even if the Broker-Dealer expenses were business expenses, they did not relate to the Funds' business and therefore should not have been allocated to the Funds. It is impossible to view this error as inadvertent, particularly when long-standing FINRA guidance requires that there be a written agreement if Broker-Dealer expenses are shifted to another entity, and the Broker-Dealer had no such written agreement with the Funds.

The improper allocation to the Funds of expenses that were unrelated to the Funds' business was unethical and falls well within the proscription of FINRA Rule 2010. It was a misuse of money belonging to investors in the Funds.

For purposes of the sanctions analysis, the Extended Hearing Panel considered a number aggravating factors, including, among others, the following: Springsteen-Abbott's lack of candor at the hearing; her submission of many false and misleading business justifications to FINRA staff; her lack of remorse, even when she was forced to admit that she had improperly allocated particular personal expenses to the Funds; the repeated pattern of misconduct; and the length of time the misconduct continued.

Furthermore, the investigation uncovered other similar misconduct. Springsteen-Abbott allocated to the Funds expenses that, even if they had been related to the Funds' business, should never have been allocated to the Funds—control person expenses. The documents creating the Funds prohibited the allocation of control person expenses to the Funds. Accordingly, because Springsteen-Abbott was a control person, her expenses were never chargeable to the Funds. Nor were her husband's expenses after he became a control person in 2010.

For the misconduct proven at the hearing, and in light of aggravating factors, the Extended Hearing Panel bars Springsteen-Abbott from association with any FINRA member firm in any capacity, orders disgorgement in the amount of \$208,953.75 (along with prejudgment interest), fines her \$100,000, and requires her to pay costs.

III. FACTS

A. Jurisdiction

By virtue of her current registration with Commonwealth, a FINRA member broker-dealer, Springsteen-Abbott is subject to FINRA's jurisdiction.¹

B. Background

(1) Hearing

A three-person Extended Hearing Panel conducted a seven-day hearing. The Parties later filed post-hearing briefs. After careful consideration of the record, the Extended Hearing Panel issues this decision setting forth its findings and conclusions.² The attached "Expense Schedule"

¹ Stip. (dated Jan. 31, 2014) ¶ 2; Art. V of FINRA's By-Laws.

² References to the hearing transcript are cited "Hearing Tr. (name of witness) page number." For example, a citation to Springsteen-Abbott's testimony is "Hearing Tr. (Springsteen-Abbott) 690." Exhibits are referred to with a prefix identifying the proponent, as in CX-number for Complainant's Exhibit and RX-number for Respondents' Exhibit. For example, Enforcement introduced a collection of the American Express statements from which it extracted alleged improper charges to the Funds as a single exhibit, "CX-129." A citation to a spreadsheet that Respondent introduced into evidence is "RX-14."

The following witnesses testified, in addition to Springsteen-Abbott: Hank Abbot ("HAbbot") (her husband); Kelly Edwards ("Edwards") (the FINRA elite examiner on the routine 2011 examination of the Broker-Dealer); Ken Aulbach ("Aulbach") (managing director for sales and marketing for Investors Capital at the time of the relevant events); Lynn Franceschina ("Franceschina") (Principal Financial Officer for the Parent Company, Broker-Dealer, and Managing Partner, as well as Chief Operations Officer); John Clark ("Clark") (FINRA Examination Manager); David E. Borham III ("Borham") (Springsteen-Abbott's adult son).

The Parties filed the following post-hearing briefs: Post-Hearing Brief Of Complainant Department Of Enforcement ("Enf. PH Brief"); Respondent's Corrected Post-Hearing Brief, accompanied by August 6, 2014 letter supplement ("Resp. PH Brief" and "Resp. PH Supplement"); Post-Hearing Reply Brief Of Complainant Department Of Enforcement ("Enf. PH Reply"). Enforcement filed corrections to its summary hearing exhibits under the title "Department Of Enforcement's Notice Of Filing Corrected Summary Hearing Exhibits" ("Corrected Summary Exhibits").

itemizes the specific credit card charges at issue and is a basis for the amount ordered as disgorgement.³

(2) Investigation And Commencement Of This Proceeding

This proceeding arose out of a routine examination that escalated when FINRA received several regulatory tips. The tips suggested that Springsteen-Abbott was charging personal expenses and billing them as business expenses.⁴ When FINRA staff broadened the examination because of the regulatory tips, the staff issued specific information requests for American Express statements, allocation schedules, and receipts and supporting documentation to reflect the charges on American Express credit card statements.⁵

Upon review of material produced in the investigation, FINRA staff started seeing patterns of charges. It appeared to the staff that there was a general pattern of personal charges being allocated to the Funds.⁶ As a consequence, the staff sought additional information from Springsteen-Abbott and contacted former employees.⁷ The staff eventually focused on a three-year period that extended from the beginning of 2009 to the beginning of 2012.⁸

In August 2012, FINRA staff sent Springsteen-Abbott a “Wells” notice, informing her that they intended to recommend that charges be brought against her. That same month, Springsteen-Abbott reversed some of the expenses identified by the staff as improper. To the extent that charges for her meals had been allocated to the Funds, she claimed that she had “backed out” those charges because she was a control person. Under the Funds’ documents, control person expenses were not allocable to the Funds.⁹

Enforcement filed the original Complaint in May 2013.¹⁰ It charged, among other things, that Springsteen-Abbott had used investor monies to pay for American Express credit

³ The Expense Schedule is a copy of the Conversion Table for Exhibit 2 of the Amended Complaint, as provided by Enforcement in its Corrected Summary Exhibits (with some reformatting and without Enforcement’s yellow highlighting). The Expense Schedule itemizes expenses that were charged to the American Express account and that Enforcement alleges in the Amended Complaint were improperly allocated to the Funds.

The Expense Schedule also contains corrections of various typographical errors that were in the original schedule that Enforcement provided. Often the corrections were no more than misspellings of restaurant names and cities. Sometimes they were corrections of dates or dollar amounts. The dollar amount corrections were often a matter of pennies. None of the corrections are material to the decision in this matter. The document retains Enforcement’s explanation for the corrections in the comment column on the far right.

⁴ Hearing Tr. (Edwards) 51-52.

⁵ Hearing Tr. (Edwards) 53-56.

⁶ Hearing Tr. (Edwards) 58-60.

⁷ Hearing Tr. (Edwards) 61-62.

⁸ Hearing Tr. (Edwards) 61.

⁹ Hearing Tr. (Springsteen-Abbott) 665-66.

¹⁰ Hearing Tr. (Springsteen-Abbott) 622.

card charges that “were not related to legitimate business purposes of the [F]unds.”¹¹ The Complaint alleged that a total of at least \$344,798.79 in investor monies was misused in this way in violation of FINRA Rule 2010.¹²

In July and August 2013, Springsteen-Abbott supervised the preparation of documents produced through counsel to FINRA staff to substantiate some of the expenses.¹³ She produced a spreadsheet of the charges identified in the Complaint. The spreadsheet contained explanations and receipts or other supporting documentation for some charges.¹⁴

Enforcement moved for leave to file an Amended Complaint based on the staff’s review of the various document productions.¹⁵ The motion was granted and the Amended Complaint was treated as filed and served on October 22, 2013. Enforcement removed from the Amended Complaint approximately 400 items totaling about \$136,000 for which Springsteen-Abbott had provided explanations.¹⁶ However, the Amended Complaint retained the allegation that Springsteen-Abbott had misused customer monies by allocating expenses to the Funds that were not related to the Funds’ business.¹⁷

In January 2014, and again in February 2014, Springsteen-Abbott, through her counsel, provided another copy of the spreadsheet accompanied by separate handwritten “tick sheets” explaining the business purpose for some expenses. Each tick sheet related to a particular expense that had been allocated initially to the Funds. Sometimes a tick sheet was accompanied by a receipt or other back up documentation.¹⁸ A tick sheet generally indicated the date an expense was incurred and a business purpose for it. If the expense was for a meal, it also indicated the people who attended the meal.

Springsteen-Abbott both supervised the January and February 2014 productions and filled out many of the tick sheets herself.¹⁹ Many of the receipts and tick sheets for meals included charges for Springsteen-Abbott. There was no indication on many of those tick sheets that Springsteen-Abbott’s portion had been “backed out” of the expenses allocated to the

¹¹ Complaint ¶ 15.

¹² *Id.* ¶ 16.

¹³ Hearing Tr. (Springsteen-Abbott) 622-24.

¹⁴ Hearing Tr. (Edwards) 73; Hearing Tr. (Springsteen-Abbott) 622; CX-6.

¹⁵ Hearing Tr. (Edwards) 76.

¹⁶ Hearing Tr. (Edwards) 372-74.

¹⁷ Amended Complaint ¶ 13.

¹⁸ Hearing Tr. (Edwards) 73-76, 81-84; CX-6; CX-7; CX-132 through CX-221. See also Hearing Tr. (counsel discussion of RX-15) 437-44; RX-15.

¹⁹ Hearing Tr. (Springsteen-Abbott) 624-26. See also Hearing Tr. (Franceschina) 515-27.

Funds.²⁰ Around the time of the February 2014 production, Springsteen-Abbott also provided documents regarding the claimed reallocation of some expenses.²¹

In filings in this proceeding, Springsteen-Abbott admitted that some expenses had been mistakenly charged to the Funds. However, she refused to specify which expenses were covered by this admission. She denied that the reallocation of an expense meant that it had been improperly allocated to the Funds in the first place. Springsteen-Abbott maintained at the hearing that even where she had reallocated an expense there was nothing wrong with the initial allocation to the Funds. Springsteen-Abbott indicated that she was attempting to appease FINRA when she reallocated some expenses, but that, in most cases, she did not agree that the initial allocation to the Funds was improper.²²

The refusal to identify which specific items Springsteen-Abbott admits were improperly allocated to the Funds necessitates a more detailed analysis in this decision than would otherwise be required.

C. The Firms, Respondent, And Respondent's Husband

(1) Corporate Structure

The Parent Company, Commonwealth Capital Corp., owns a holding company, Commonwealth of Delaware ("Holding Company"). The Holding Company in turn owns

²⁰ See, e.g., CX-143; CX-145; CX-146; CX-150; CX-151.

²¹ Hearing Tr. (Edwards) 324-29.

²² See, e.g., Answer To Amended Complaint ¶¶ 13, 14, 15, 20, 27, and 28. These paragraphs of the Answer contain admissions that either explicitly or implicitly acknowledge that Respondent has identified some expenses that were charged to the Funds when they should not have been.

Prior to the hearing, the Hearing Officer asked Respondent's counsel to indicate exactly which particular expenses were covered by these admissions. The Hearing Officer indicated that such specification of the admitted erroneous charges would relieve the Extended Hearing Panel of having to sort through all of the more than 1800 alleged improper expenses. See Pre-Hearing Conference Tr. of Nov. 25, 2013, at 12-14, 16-17, 19-20; and Pre-Hearing Conference Tr. of Feb. 21, 2014, at 25-26.

Counsel's responses at the conferences and Springsteen-Abbott's testimony at the hearing were consistent. They did not identify the line items covered by the admissions. Instead they asserted that, although she claimed to have reallocated many items, reallocation did not signify an admission that any particular item had been improperly allocated to the Funds. Springsteen-Abbott testified that she continued to believe that even reallocated items had been properly allocated in the first instance to the Funds. Hearing Tr. (Springsteen-Abbott) 784, 820-21.

Springsteen-Abbott's husband reiterated that view in his testimony, saying that even as to reallocated expenses, "[W]e believe they were properly allocated." Hearing Tr. (HAbbott) 1002. He repeated that theme, saying "[T]o the extent that FINRA doesn't like something, our attitude has been, let's reverse it and move on." But, when asked whether he thought it was proper, in the first instance, to allocate a reallocated expense to the Funds, he said "I do." Hearing Tr. (HAbbott) 1023.

Springsteen-Abbott took the same position in her stipulations with Enforcement. See Stip. ¶ 18 (Jan. 31, 2015) (what appeared to be vacation expenses in Sonoma were reallocated "notwithstanding [Springsteen-Abbott's] disagreement with [FINRA] Staff's concern.").

Springsteen-Abbott's Broker-Dealer, Commonwealth Capital Securities Corp., which is a FINRA member. The Holding Company also owns the Funds' General Partner, Commonwealth Income and Growth Fund, Inc.²³

The Commonwealth family of businesses support one another and do no other, independent business. The Parent Company is the sponsor for the Funds. The General Partner is in partnership with the limited partners and public investors who invest in the Funds, and it manages the Funds. The Broker-Dealer is the dealer-manager for offerings of the Funds. It wholesales the Funds to other broker-dealers who then sell them to investors. The Broker-Dealer has no other business.²⁴

(2) Springsteen-Abbott

Springsteen-Abbott took over the Commonwealth family of businesses in approximately 2005 after her husband, George Springsteen, died.²⁵ She is the top executive for all the relevant entities.²⁶ She is the Parent Company's sole shareholder, CEO, and Chairman, and the General Partner's CEO and Chairman.²⁷ Springsteen-Abbott is, and was throughout the three years at issue, a control person of the General Partner. As a control person, her salary, benefits, and expenses are not allocable to the Funds.²⁸

Springsteen-Abbott is the CEO, Chairman, and CCO of Commonwealth, the Broker-Dealer.²⁹ She holds a Series 7, a Series 63, and the DPP, Direct Participation Program, Principal's license, Series 39.³⁰

Springsteen-Abbott is the only person with authority to make allocations of expenses to the Funds.³¹

A number of Springsteen-Abbott's family members are employed in different capacities in the various companies, enabling her to believe she could, with impunity, claim a business purpose for what were really family meals and other personal expenses. Relatives involved in the business during some portion of the relevant three years included Springsteen-Abbott's current husband, Hank Abbott, whom she married in 2008, his sister, RF, one of Springsteen-

²³ Hearing Tr. (Franceschina) 573-75; Hearing Tr. (Springsteen-Abbott) 1210.

²⁴ Hearing Tr. (Franceschina) 601-02, Hearing Tr. (Springsteen-Abbott) 843-44, 1211-12.

²⁵ Hearing Tr. (Springsteen-Abbott) 853, 1227-36.

²⁶ Hearing Tr. (Springsteen-Abbott) 618.

²⁷ Hearing Tr. (Springsteen-Abbott) 616-18; Hearing Tr. (Edwards) 63; CX-1.

²⁸ Hearing Tr. (Springsteen-Abbott) 779-81. See discussion below of the Funds' agreements regarding expenses.

²⁹ Hearing Tr. (Springsteen-Abbott) 616-17.

³⁰ Hearing Tr. (Springsteen-Abbott) 1209.

³¹ Stip. ¶ 12 (Jan. 31, 2014).

Abbott's daughters, HC, her son, David Borham, her then-son-in-law, JC, her brother, MC, her sister, DP, her brother-in-law, AP, and a cousin, MH.³²

(3) Hank Abbott

Hank Abbott runs the leasing operations in which the Funds invest. He is responsible for lease acquisitions, equipment dispositions, portfolio review, and the remarketing of lease equipment.³³

Hank Abbott is president of the Parent Company and serves on its board of directors.³⁴ He also is a director of the Broker-Dealer and a director of the General Partner.³⁵ He was not a control person of the General Partner in 2009, but he became a control person sometime in 2010 and remained so in 2011.³⁶ Once he became a control person, his salary, benefits, and expenses were not allocable to the Funds.³⁷

Hank Abbott incurred a large portion of the improperly allocated expenses. As further described below, Springsteen-Abbott allocated to the Funds numerous charges by her husband for rental cars, meals, and bar bills. He incurred many of these charges near one of his two residences, in Holiday, Florida (near Tampa) and in Boothwyn, Pennsylvania (outside of Philadelphia).³⁸ He incurred others on visits to New Jersey and Connecticut to see family and friends and to obtain hair restoration services.³⁹ He incurred still others on family vacations that he took with Springsteen-Abbott.⁴⁰

D. The Funds

Some of the Funds are public; others are private. The Funds are offered to investors pursuant to registration statements and prospectuses (in the case of the public funds) and private placement memoranda (in the case of the private funds) (collectively "Offering Documents").⁴¹

³² Hearing Tr. (Edwards) 69-71; Hearing Tr. (Springsteen-Abbott) 1268-70.

³³ Hearing Tr. (HAbbott) 861-62.

³⁴ Hearing Tr. (HAbbott) 860-61; Hearing Tr. (Edwards) 66.

³⁵ Hearing Tr. (HAbbott) 860-61.

³⁶ Hearing Tr. (Franceschina) 1176. Springsteen-Abbott disputes that her husband was a control person, but, based on the disinterested testimony that Springsteen-Abbott's employee, Franceschina, volunteered, the Extended Hearing Panel finds that he was a control person beginning in 2010. See the discussion below regarding improperly allocated expenses of control persons.

³⁷ Hearing Tr. (Franceschina) 1176. See discussion below of the Funds' agreements regarding expenses.

³⁸ Hearing Tr. (HAbbott) 865-66, 906; Hearing Tr. (Edwards) 66-67; 209-14; CX-127.

³⁹ Hank Abbott has two adult daughters, CA and KA, who live, respectively, in Jersey City, New Jersey, and Ridgefield, Connecticut. These are places he visited often and where he incurred many of the improperly allocated expenses. Hearing Tr. (HAbbott) 866-67; Hearing Tr. (Edwards) 69-71.

⁴⁰ Hearing Tr. (HAbbott) 1003-05.

⁴¹ Stip. (dated Jan. 14, 2014) ¶ 8.

The Offering Documents, which are issued at the direction of Springsteen-Abbott, include a Limited Partnership Agreement (in the case of the public Funds) or an Operating Agreement (in the case of the private Funds).⁴² Springsteen-Abbott has the sole responsibility for determining whether to allocate expenses to a particular Fund, in accordance with the Limited Partnership Agreement or Operating Agreement for the Fund.⁴³

At the outset, each Fund is a blind pool. It first raises money from investors. Then the General Partner searches for attractive assets and acquires equipment leases. Each Fund acquires information technology equipment, medical technology equipment, telecommunications equipment, and other similar equipment. The equipment leases are short-term, generally for one to three years. The Funds themselves are longer term investments, generally running eight to ten years. Accordingly, there is turnover in a Fund's lease portfolio, and the Fund continues acquiring new leases throughout the term of the Fund.⁴⁴

The General Partner identifies lease transactions for the Funds and analyzes them in detail. Springsteen-Abbott testified that extensive criteria are involved and that concentration in a particular equipment type, lessor, or lessee is a concern. The General Partner seeks to diversify each Fund's holdings.⁴⁵

The Funds have no employees. The employees of the Parent Company do the work that needs to be done for the Funds.⁴⁶

Between December 1993 and the filing of the Amended Complaint in October 2013, thirteen different Funds were created and sold to investors, raising over 240 million dollars.⁴⁷

⁴² Stip. (dated Jan. 14, 2014) ¶ 9.

⁴³ Stip. (dated Jan. 31, 2014) ¶ 12.

⁴⁴ Hearing Tr. (Springsteen-Abbott) 1212-15; Stip. (dated Jan. 31, 2014) ¶ 6.

⁴⁵ Hearing Tr. (Springsteen-Abbott) 837-38.

⁴⁶ Hearing Tr. (Springsteen-Abbott) 1245.

⁴⁷ Stip. (dated Jan. 31, 2014) ¶ 6.

E. The Funds' Agreements Regarding Expenses

Although the Offering Documents for the Funds differ somewhat, the Parties stipulated that they are essentially identical with respect to the allocation of expenses to the Funds.⁴⁸

Article 5 of the Operating Agreement for the private Funds provides in section 5.2 that the Fund shall reimburse the General Partner for expenses relating to the administration and operation of the Fund. Article 5 states in section 5.3, however, that the salaries, fringe benefits, travel expenses and other administrative items incurred by the General Partner's controlling persons are excluded from the allowable reimbursements. Article 6 of the Operating Agreement separately provides for the General Partner to receive various fees as compensation for its work.⁴⁹ The Partnership Agreement for the public Funds contains the same provision for reimbursement to the General Partner for expenses incurred in conducting a Fund's business, and the same exclusion for expenses incurred by controlling persons.⁵⁰

F. Respondent's System Of Allocating Expenses To The Funds

Springsteen-Abbott had no written procedures or written guidelines governing expense allocations to the Funds.⁵¹ She testified, however, that she acted within the agreements that governed the allocation of expenses.⁵² The evidence contradicts her testimony.

Springsteen-Abbott was able to obscure that she was treating personal expenses as though they were business expenses because of the system that she employed for charging business expenses and allocating them to the Funds, as described below. That system made it far more likely that mistakes would be made and improper allocations would be concealed.

The determination to allocate an expense rests solely with Springsteen-Abbott.⁵³ She claimed that her approach is that in order to charge a meal as a business meal, whether to the Funds or to the Parent Company, the whole meal has to be about business. She claimed that

⁴⁸ The Parties stipulated that, with respect to the private Funds, Articles 5 (Company Expenses) and 9 (Rights, Power and Duties of Manager) of the Operating Agreements are identical. There are slight variations among the different provisions of Article 6 (Compensation of the Manager) of the different Operating Agreements that relate to the fees associated with acquiring, managing, and liquidating equipment. Despite those variations in Article 6, the Parties nevertheless agree that RX-9 is an appropriate exemplar for the Extended Hearing Panel to use in connection with the public Funds. Stip. (dated April 25, 2014) ¶ 2.

The Parties stipulated that, with respect to the public Funds, Articles 5 (Partnership Expenses), 6 (Compensation of the General Partner) and 9 (Rights, Powers and Duties of General Partner) of the Limited Partnership Agreements are identical. Accordingly, the Parties agree that RX-10 is an appropriate exemplar for the Hearing Panel to use in connection with the public Funds. Stip. (dated April 25, 2014) ¶ 1.

⁴⁹ RX-9.

⁵⁰ RX-10.

⁵¹ Hearing Tr. (Franceschina) 510; Hearing Tr. (Springsteen-Abbott) 845-46, 848.

⁵² Hearing Tr. (Springsteen-Abbott) 846.

⁵³ Hearing Tr. (Springsteen-Abbott) 723.

everybody who was at the meal had to be discussing business (aside from a few pleasantries).⁵⁴ Given the proof at the hearing that Springsteen-Abbott allocated to the Funds expenses for numerous personal special occasion meals, including a birthday celebration with her best friend while on vacation, and a Thanksgiving dinner, as well as routine dinners with her family and grandchildren, her testimony is inconsistent with the other credible evidence. The record does not reflect that Springsteen-Abbott took any care that a particular meal charge related to the Funds' business.

Springsteen-Abbott, Hank Abbott, and Lynn Franceschina, an employee, used American Express cards that were linked to a single account belonging to the Parent Company. They charged both personal and business expenses to the account. So, for example, veterinary bills and pet supplies were charged on the American Express card. When asked why it would not be simpler to have a separate personal card for such charges, Springsteen-Abbott claimed that she included such personal charges on the Parent Company's card in order to collect points. She testified that she did not have time to even think about opening a second credit card account. On the other hand, she testified that she and her husband had many other credit cards, which they used for personal charges.⁵⁵ She claimed that she did not know during the relevant period that she could have consolidated separate personal and business cards for point accumulation purposes on American Express, although she knows that now.⁵⁶

Each month an American Express statement of charges in the preceding month would arrive.⁵⁷ For each of the three cardholders, the statement showed the date each charge was posted, the vendor, and the general category of item purchased. Springsteen-Abbott and Franceschina each received a copy of the statement. Each went through the statement and made notes. If there were unusual items, they might talk or correspond by email about those items. Franceschina noted some initial allocations on her copy based on what she knew about travel and other business activities during the preceding month. Springsteen-Abbott made similar notes on her copy and sent it to Franceschina. When Franceschina received Springsteen-Abbott's copy, she would treat it as the final approval for the invoice. Unless there were further questions, Franceschina instructed accounts payable to enter the information into the accounting system. Accounts payable then prepared documentation for Springsteen-Abbott's final review and approval.⁵⁸

Springsteen-Abbott would then receive from accounts payable a voucher. The voucher consisted of a cover sheet showing the entity to be paid, the invoice number, and how the charges were allocated. The voucher did not show American Express line items. Rather, it

⁵⁴ Hearing Tr. (Springsteen-Abbott) 846-49.

⁵⁵ Hearing Tr. (Springsteen-Abbott) 851-54.

⁵⁶ Hearing Tr. (Springsteen-Abbott) 854.

⁵⁷ The American Express statements are collected in CX-129. Hearing Tr. (Franceschina) 507.

⁵⁸ Hearing Tr. (Franceschina) 507-08, 591-97; Hearing Tr. (Edwards) 77-78.

showed categories of expenses and how they were allocated among the Funds and other affiliated entities. Springsteen-Abbott signed the voucher.⁵⁹

Because the American Express bill was issued to the Parent Company, if an expense was personal, Springsteen-Abbott testified that she would identify it as such and write a check to the Parent Company to reimburse it for the charge. For example, she testified that this is how she treated the veterinary expenses.⁶⁰ This purported process of reimbursing the Parent Company for personal expenses would appear to involve more effort than simply using a personal credit card for personal expenses and using the American Express card only for business expenses. It undercuts her testimony that she charged both personal and business expenses on the American Express card because she did not have time to open a second credit card account.

Many expenses charged to the American Express account were not easily classified as personal or business. Hank Abbott testified that Franceschina came to him almost every month with questions about the different categories of charges on his card. For example, he claimed that they did not allocate liquor to the Funds although they would allocate food to the Funds. He recalled once that Franceschina had asked him the breakdown for charges he had made in connection with a holiday party and awards dinner for employees in order to segregate the alcohol charge.⁶¹ Hank Abbott's claim that they did not allocate liquor to the Funds is flatly contradicted by the evidence. As discussed below, expenses for bar charges, wine, and other alcohol were routinely allocated to the Funds.

Business expenses could be allocated to the Funds or to one of the three operating companies: the Parent Company; the Funds' General Partner; or the Broker-Dealer.⁶² Most items allocated to the Funds were allocated proportionately, but if an expense was particular to one Fund, such as a lease that belonged only to a particular Fund, then it would be allocated to the particular Fund.⁶³

Springsteen-Abbott testified that she reviewed the American Express account activity "fiercely," and line-by-line.⁶⁴ She said that the process of allocating expenses was a careful process. Part of her review was to make sure that the Funds do not pay for personal things.⁶⁵

⁵⁹ Hearing Tr. (Franceschina) 562-65, 575-77. In her post-hearing brief, Springsteen-Abbott argued that she was unaware of the improper allocations because the document she ultimately approved, the voucher, did not contain line item information. Resp. PH Brief at 1-2, 4 and n.2. As discussed below, the Extended Hearing Panel rejects Springsteen-Abbott's attempt to avoid her responsibility for the improperly allocated expenses. She is responsible for both the system of allocation and the allocations themselves.

⁶⁰ Hearing Tr. (Springsteen-Abbott) 853.

⁶¹ Hearing Tr. (HAbbott) 1033-34.

⁶² Hearing Tr. (Franceschina) 577, 607-09.

⁶³ Hearing Tr. (Franceschina) 581.

⁶⁴ Hearing Tr. (Springsteen-Abbott) 619-20.

⁶⁵ Hearing Tr. (Springsteen-Abbott) 621.

Given that testimony, Springsteen-Abbott is accountable for the multiple improper allocations of expenses to the Funds discussed below.

Franceschina learned how to process the American Express bill (sometime in 2004 or shortly after) from Springsteen-Abbott. Franceschina acted on the basis of what she thought Springsteen-Abbott thought should be allocated. There was no written policy on allocation.⁶⁶

An allocation of an expense to the Parent Company ultimately costs Springsteen-Abbott money, because she is the Parent Company's sole shareholder. An allocation to the Funds benefits her because she does not have to bear the expense.⁶⁷

G. Improperly Allocated Personal Expenses

Throughout 2009, 2010, and 2011, Springsteen-Abbott and her husband celebrated special occasions and engaged in the ordinary activities of life, charging their living expenses on the Parent Company's American Express card. Then Springsteen-Abbott improperly allocated those expenses to the Funds.

To counter the impression that she and her husband were living on the Funds' money, Springsteen-Abbott testified that she and her husband have other credit cards that they use for personal expenses. She presented a couple of compilations of personal charges that she asserts she and her husband incurred on other credit cards during the three years in issue.⁶⁸ The compilations show individual purchases on particular dates under particular categories. The compilations show a total of approximately \$220,000 in charges.⁶⁹

Study of the compilations reveals that Springsteen-Abbott and her husband charged most of their meals to the American Express card, making the meals available for allocation to the Funds. In January 2009, for example, Springsteen-Abbott incurred no personal meal charges on the other cards, either for travel meals or for local meals.⁷⁰ That month her husband incurred meal charges on the other cards, totaling \$45.28 (\$18.85 in vacation meals; \$26.43 in local meals).⁷¹ In contrast, that same month, in January 2009, the two charged close to \$13,000 in meals on the American Express card (charges that Enforcement alleged in its Amended Complaint were improperly allocated to the Funds). The American Express card charges ranged from a dinner that cost more than \$300 to many daily fast food charges in small amounts.⁷²

⁶⁶ Hearing Tr. (Franceschina) 597-99.

⁶⁷ Hearing Tr. (Springsteen-Abbott) 777-78, 849-50.

⁶⁸ RX-13; RX-14.

⁶⁹ Resp. PH Brief at 5-6. Hearing Tr. (Springsteen-Abbott) 1259-68; RX-13; RX-14.

⁷⁰ RX-13.

⁷¹ RX-14.

⁷² See the attached Expense Schedule.

In fact, the meal charges on the American Express card in that one month, January 2009, roughly equaled the meal charges on their personal credit cards for the entire three-year period. According to the compilations, from November 13, 2008, through December 20, 2011, Hank Abbott charged on other cards \$ 6,848.69 for travel meals and \$5,716.28 in local meals, a total of \$12,564.97. From December 1, 2008, through July 21, 2011 (the period of time shown on the compilation for her), Springsteen-Abbott charged on other cards \$470.92 for travel meals and \$1,231.14 for local meals.⁷³

The impression that Respondent would like to create—that she and her husband charged the American Express card modestly, and only when appropriate—is not supported by the record. While it may be that Springsteen-Abbott and her husband did not live exclusively on the American Express charges allocated to the Funds, the record shows a pattern of substantial personal expenses allocated to the Funds throughout 2009, 2010, and 2011.⁷⁴

Some of the personal expenses improperly allocated to the Funds are described below. They are organized in a manner to convey the day-in, day-out nature of Springsteen-Abbott's misconduct. Where similar expenses occurred in different months and years, they are discussed in the same section as the earliest item. A few additional personal expenses, not tied to the month-by-month organization, are discussed after the December and year-end expenses. The expenses discussed here do not include all of the improperly allocated expenses proven at the hearing, but these expenses are sufficient to show Springsteen-Abbott's pattern and practice over the three years from 2009 through 2011.

As to the personal expenses described below, this decision goes into substantial detail to demonstrate how profoundly untrustworthy the testimony of Springsteen-Abbott and Hank Abbott was.

(1) January: Booking For 2009 Birthday Cruise To Alaska

DA is one of Springsteen-Abbott's best friends. DA and her husband, HA, both worked for one of Springsteen-Abbott's companies.⁷⁵

In January 2009, HA suggested that Springsteen-Abbott and her husband join HA and DA on a cruise from Vancouver to Alaska that he was planning to celebrate his wife's birthday.

⁷³ RX-13; RX-14.

⁷⁴ Springsteen-Abbott testified that her husband had other personal credit cards but he could not obtain the records for those. Hearing Tr. (Springsteen-Abbott) 1262-63. Even if true, it does not detract from the large amount of meal charges on the American Express card.

⁷⁵ Hearing Tr. (Springsteen-Abbott) 629, 633; CX-132.

Because the cruise was scheduled around the time of Springsteen-Abbott's birthday, it would be a double celebration.⁷⁶ Accordingly, Springsteen-Abbott booked a reservation for the cruise.⁷⁷

As Springsteen-Abbott admitted, the cruise was a family vacation for the purpose of celebrating both DA's and Springsteen-Abbott's birthdays.⁷⁸ However, although the cruise was a personal vacation, Springsteen-Abbott allocated to the Funds ten charges made on this trip, including airfare, food, and rental car expenses.⁷⁹

Springsteen-Abbott eventually admitted that two of the birthday cruise expenses were improperly allocated to the Funds. She only did so, however, as a result of the investigation and this proceeding:

(a) Springsteen-Abbott allocated \$251.60 to the Funds for a dinner at Fiori D'Italia that the four friends had in Vancouver. She testified that the purpose of the dinner was to celebrate DA's birthday in her capacity as a "manager." In a memorandum that appeared in a post-Complaint document production, however, Springsteen-Abbott indicated that the charge should have been to the Parent Company.⁸⁰ This adjustment was unnecessary if the allocation to the Funds was proper. Thus, the adjustment supports an inference that Springsteen-Abbott knew that the expense was not proper and would not withstand regulatory scrutiny once the investigation began. Because the expense was reallocated to the Parent Company and not to Springsteen-Abbott personally, it appears that she concluded that the dinner concerned Parent Company business and not Fund business. The Extended Hearing Panel finds that the dinner concerned no business at all, but, rather, was a personal expense.

(b) Springsteen-Abbott allocated \$16.63 to the Funds for a fast food charge at the airport in Phoenix, where she and her husband had a layover on the way to Vancouver for the birthday cruise. In the post-Complaint document productions, she provided a tick sheet justifying the charge as relating to her husband's attendance at a supplier diversity conference. At the hearing, however, she was confronted with documentary evidence that the tick sheet was wrong. The calendar entry supporting attendance at the supplier diversity conference belonged to another person, not Hank Abbott. Springsteen-Abbott then admitted that the business justification she provided actually related to an employee's business trip, and not to her and her husband's vacation. She acknowledged that allocating the fast food charge to the Funds was an error.⁸¹

⁷⁶ Hearing Tr. (Springsteen-Abbott) 627-31.

⁷⁷ Hearing Tr. (Springsteen-Abbott) 630-31.

⁷⁸ Hearing Tr. (Springsteen-Abbott) 627-33.

⁷⁹ CX-129 at 7-8, 116, 120-22; CX-130.

⁸⁰ Hearing Tr. (Springsteen-Abbott) 627-29; CX-132.

⁸¹ Hearing Tr. (Springsteen-Abbott) 636-39; CX-133.

Springsteen-Abbott nevertheless resisted admitting that the car rental in Vancouver and other charges allocated to the Funds in connection with the birthday cruise were improper.⁸² She asserted that the trip was partially a business trip, apparently because DA and her husband worked at the Parent Company.⁸³

The Extended Hearing Panel finds that the ten charges allocated to the Funds in connection with the birthday cruise, were improper. Springsteen-Abbott admitted it was a vacation trip, and the circumstances make clear that it was a vacation trip. The genesis of the trip was HA's suggestion in January 2009 to Springsteen-Abbott that she and her husband accompany him and DA on a birthday cruise he was planning. There is no evidence to support Springsteen-Abbott's claim that there was any business purpose or activity. She simply asserted that she was traveling with people who worked for her company and celebrating DA's birthday in her capacity as a "manager" at Springsteen-Abbott's company. The possibility that the group may have discussed unspecified business from time to time does not support the allocation of these vacation expenses to the Funds.

Moreover, Enforcement proved that Springsteen-Abbott provided false documentation to support the business justification for at least one of the expenses, the fast food charge during the layover at the airport. Springsteen-Abbott had no good explanation for why the false documentation was provided. This undercuts her credibility.

The Extended Hearing Panel also finds that Springsteen-Abbott knew that it was improper to allocate her vacation expenses to the Funds. She admitted that vacation expenses should not be allocated to the Funds.⁸⁴

(2) Beginning In January: Cody's Roadhouse Meals With Grandchildren, Family, And Friends Throughout 2009, 2010, and 2011

January 29, 2009. Springsteen-Abbott allocated to the Funds a January 2009 dinner charge of \$86.34. Springsteen-Abbott herself wrote the business justification on the tick sheet for this meal. She wrote, "Review projects, [JC] and [HC]." JC was her son-in-law at the time, and HC is one of Springsteen-Abbott's daughters. At the time, both JC and HC were working at Springsteen-Abbott's company. The receipt for the meal included children's food.⁸⁵ Springsteen-Abbott testified at the hearing that the dinner charge had at some point been reversed because of the children's meals.⁸⁶

⁸² Hearing Tr. (Springsteen-Abbott) 639-45.

⁸³ Hearing Tr. (Springsteen-Abbott) 646.

⁸⁴ Hearing Tr. (Springsteen-Abbott) 646.

⁸⁵ The receipt showed that milk, a corn dog, and a "kid's mac & cheese" were ordered, in addition to adult food (wine, iced tea, prime rib and rib eye entrees). CX-131, at 20-22.

⁸⁶ Hearing Tr. (Springsteen-Abbott) 807-09; CX-131, at 20-22.

Springsteen-Abbott did not explain why the dinner had originally been allocated to the Funds. Nor did she explain why she had provided the business justification for it if it was obvious from the receipt that the charge was for a meal with her daughter, then son-in-law, and one or more grandchildren.

The Extended Hearing Panel finds that the January 2009 dinner charge was improperly allocated to the Funds. The Extended Hearing Panel further finds that there is no evidence to indicate that Springsteen-Abbott had a good faith belief at the time of the meal that it was appropriate to allocate the meal to the Funds. Finally, the Extended Hearing Panel finds that Springsteen-Abbott provided a vague business purpose for the meal—"projects"—in an attempt to cloak a family meal with a business purpose. The tick sheet with the business justification was attached to a receipt showing the purchase of one or two children's meals. If the receipt with the children's meals signaled to Springsteen-Abbott that the charge should be reversed, as she claimed that it did, then she should never have submitted the tick sheet to FINRA staff claiming a business purpose that justified the original allocation to the Funds.

April 24, 2010. Springsteen-Abbott allocated to the Funds an April 24, 2010 dinner charge of \$174.97 at Cody's Roadhouse. She provided a tick sheet showing that the dinner was attended by four adults: Springsteen-Abbott, her friend DA, Springsteen-Abbott's husband, and Springsteen-Abbott's brother. The tick sheet labeled the dinner a travel meal, although Springsteen-Abbott's brother was the only person who was traveling from out of town.⁸⁷

The receipt that accompanied the tick sheet as backup showed that a party of six was at the dinner, which indicated there were two additional persons at the dinner. The receipt also showed that food had been ordered consistent with at least one child at dinner. The order included two milks, a mini soft drink, and chicken fingers. Other food and drink ordered at the dinner included beer and wine, and adult meals for four consisting of lobster and prime rib.⁸⁸

Springsteen-Abbott vehemently denied in her hearing testimony that the dinner had been a family dinner with children.⁸⁹ Then she was shown an email she sent her daughter earlier on April 24, 2010, making plans for a dinner with her daughter⁹⁰

The Extended Hearing Panel finds that the April 24, 2010, dinner at Cody's Restaurant was improperly allocated to the Funds. The Extended Hearing Panel further finds that the tick sheet Springsteen-Abbott provided to justify the charge was false. The Extended Hearing Panel additionally finds that Springsteen-Abbott's testimony regarding this dinner was not credible.

⁸⁷ Hearing Tr. (Springsteen-Abbott) 686-87; CX-147. Springsteen-Abbott allocated the amount on the receipt (\$144.96) plus a tip, which was handwritten on the documentation.

⁸⁸ CX-147.

⁸⁹ Hearing Tr. (Springsteen-Abbott) 687-88.

⁹⁰ Hearing Tr. (Springsteen-Abbott) 688-90; CX-230.

August 11, 2010. Springsteen-Abbott allocated to the Funds an August 11, 2010 dinner charge of \$104.23 at Cody's Roadhouse. Later, in connection with a post-Complaint production, Springsteen-Abbott provided a tick sheet and backup documentation as the business justification for the charge. The tick sheet was detailed. It said that Springsteen-Abbott and her husband, along with HA, DA, and one other person, attended the dinner. It listed three business topics that were discussed: the review of a cash report, a new candidate for "BDA," and a rent quote for the tech center.⁹¹

Springsteen-Abbott was asked whether the meal was actually a meal with her family. She flatly denied that, saying, "No."⁹² When she was asked about a \$2.89 charge for a "kid's mac & cheese," she explained that she was on a Jenny Craig diet and she was eating appetizers and drinking 2% milk.⁹³

Then Springsteen-Abbott was confronted with email correspondence that she had written the next day after the dinner. In that correspondence, she wrote to her sister about the dinner the night before, and described it as a dinner with her daughter and her daughter's children to comfort her daughter, who was going through a hard time.⁹⁴

After she was confronted with the email correspondence, Springsteen then agreed that the meal at Cody's Roadhouse was a dinner with her daughter and grandchildren. She also agreed that it was an error to allocate the charge to the Funds.⁹⁵

Springsteen-Abbott's insistence that the August 2010 Cody's Roadhouse dinner was a business meal, until she was shown proof that it was not, damaged her credibility with the Extended Hearing Panel. Springsteen-Abbott's assertion that she ate the "kid's mac & cheese" meal as part of a Jenny Craig diet plan also was not credible. At the hearing, she sometimes admitted that a children's meal signified that her grandchildren were at a meal and other times she denied that they were present, despite a receipt for children's food. The Extended Hearing Panel finds that this type of inconsistency further damaged Springsteen-Abbott's credibility.

The Extended Hearing Panel finds that the dinner on August 11, 2010, was improperly allocated to the Funds. The Extended Hearing Panel further finds that the tick sheet business justification produced to FINRA staff was false. Springsteen-Abbott's testimony with regard to the business nature of the dinner was not credible and was inconsistent with other evidence. Springsteen-Abbott offered no explanation for why the dinner was improperly allocated to the Funds. As for why the detailed tick sheet regarding the business justification for the allocation

⁹¹ Hearing Tr. (Springsteen-Abbott) 672-78; CX-145.

⁹² Hearing Tr. (Springsteen-Abbott) 674.

⁹³ Hearing Tr. (Springsteen-Abbott) 674. The receipt showed that, in addition to the "mac & cheese" meal, the group had ordered chicken fingers and four milks, prime rib, cheese fries, two red wines, and three beers, along with salad for five. CX-145, at 3.

⁹⁴ Hearing Tr. (Springsteen-Abbott) 676-78.

⁹⁵ Hearing Tr. (Springsteen-Abbott) 678.

was false, Springsteen-Abbott testified that the period when the documentation was collected was a difficult period for her because her father passed away. She said simply that she had done the best she could, but that she made some errors.⁹⁶ She failed to explain how the particularized tick sheet setting forth multiple business topics purportedly discussed at the meal came to be attached to a receipt for a family dinner with her grandchildren.

October 10, 2010. Springsteen-Abbott allocated to the Funds an October 10, 2010 dinner charge of \$89.67 for a dinner at Cody's Roadhouse, which was one day after her daughter's birthday. The tick sheet later produced with the business justification for the dinner said that the meal was attended by Springsteen-Abbott and her husband, DA, HA, and one of Springsteen-Abbott's daughters. The tick sheet said that the group talked about whether the company could become a transfer agent and a woman who had interviewed for the transfer agent position.

Email correspondence showed that the interview of the candidate had taken place about a month earlier, on September 16, 2010, so the topic did not appear particularly current at the time of the meal.⁹⁷

The receipt for the meal showed that a complimentary birthday dessert was provided. Several items were ordered that appeared to be for children: a grilled cheese sandwich for \$2.49; a cheese pizza for \$2.98; and two milks. When asked whether these were children's meals, Springsteen-Abbott said she did not know. When asked whether the two milks were for her two grandchildren, she said no. She claimed the two milks were for her.⁹⁸

The meal was for a party of five, according to the receipt. The receipt also showed that, in addition to what appeared to be two meals for children, there seemed to be food appropriate for three adults.⁹⁹

The receipt is consistent with a dinner for Springsteen-Abbott and her daughter and grandchildren, along with one other adult and inconsistent with the tick sheet showing that it was dinner for five adults. Springsteen-Abbott's tick sheet showing that the meal was attended by five adults appears to the Extended Hearing Panel to be a fabrication.¹⁰⁰

The Extended Hearing Panel finds that the Cody's Roadhouse dinner on October 10, 2010, was a birthday dinner for Springsteen-Abbott's daughter, and the cost was improperly charged to the Funds. The Extended Hearing Panel also finds Springsteen's testimony that her grandchildren were not present not credible.

⁹⁶ Hearing Tr. (Springsteen-Abbott) 678.

⁹⁷ Hearing Tr. (Springsteen-Abbott) 681-84; CX-146.

⁹⁸ Hearing Tr. (Springsteen-Abbott) 685-86.

⁹⁹ CX-146, at 4. The group ordered a margarita, two beers, two onion soups, two prime ribs, and a pot pie.

¹⁰⁰ CX-146, at 2.

March 13, 2011. Springsteen-Abbott allocated to the Funds a March 13, 2011 dinner charge of \$113.96 at Cody's Restaurant. In a post-Complaint production, Springsteen-Abbott provided a tick sheet with a business justification, along with the receipt. The tick sheet described the meal as a dinner meeting with DA. According to the tick sheet, the purpose of the meal was to discuss the status of outstanding investor services issues.¹⁰⁵

The receipt was inconsistent with the tick sheet explanation. The receipt showed that a party of six attended the dinner. It also showed that food had been ordered that was more consistent with a party of four adults and two children.¹⁰⁶ Nevertheless, Springsteen-Abbott staunchly denied that the meal was actually a family meal with her two grandchildren.¹⁰⁷

The Extended Hearing Panel finds that Springsteen-Abbott improperly allocated the March 13, 2011 dinner to the Funds. The Extended Hearing Panel also finds that the tick sheet she provided to justify the charge was false. Finally, the Extended Hearing Panel finds Springsteen-Abbott's testimony at the hearing on this expense was not credible.

(3) February: Expenses Relating To Hair Restoration Trips And Family Visits

February 1-2, 2010. JA Alternatives is a hair restoration company located in Paramus, New Jersey, that Hank Abbott visited on numerous occasions during the relevant period.¹⁰⁸ He testified that he regularly visited the hair restoration company every other month, perhaps fifteen to twenty times in total during the period at issue.¹⁰⁹

On February 1, 2010, prior to a board of directors meeting in Hawaii, Hank Abbott traveled from his home in Florida to New Jersey for a hair restoration treatment at JA Alternatives and then returned to Florida in less than twenty-four hours. A number of expenses related to this trip were charged to the Funds,¹¹⁰ although the expense for the hair restoration

¹⁰⁵ Hearing Tr. (Springsteen-Abbott) 691-93; CX-148.

¹⁰⁶ CX-148, at 4. According to the receipt, a salad for four was ordered, along with two prime rib dinners and one order of half ribs, mozzarella sticks, and wings, along with two beers and two glasses of wine. In addition, two children's meals and two milks were ordered.

¹⁰⁷ Hearing Tr. (Springsteen-Abbott) 693-94.

¹⁰⁸ Hearing Tr. (HAbbott) 867-68.

¹⁰⁹ Hearing Tr. (HAbbott) 894.

¹¹⁰ Hearing Tr. (HAbbott) 870-94; CX-129, at 273. The Expense Schedule attached to this decision organizes the expenses charged on the American Express card that were later allegedly improperly allocated to the Funds in chronological order by date of posting. The Expense Schedule also indicates who was the purchaser, Hank Abbott or his wife or Lynn Franceschina. The Expense Schedule is a useful tool for tracing clusters of expenses related to a particular event like the trip to the hair restoration service. See Expense Schedule, items 749-55.

In addition, the American Express bills provide a fuller picture of Hank Abbott's activities, because they include other charges on the card in addition to those allocated to the Funds. CX-129, at 295-96.

treatment was not charged to the Funds. Hank Abbott agreed that the hair restoration service was a personal expense.¹¹¹

Hank Abbott began his travel by driving to the Tampa airport in a rented car that he had first rented at the Tampa airport on January 13, 2010, two weeks before. He parked the car at the Tampa airport.¹¹²

When Hank Abbott arrived in New Jersey, he rented another car at Newark airport.¹¹³ He spent the night in a hotel in Saddlebrook, New Jersey.¹¹⁴ The next day, on February 2, 2010, he went to Paramus for his hair restoration appointment.¹¹⁵ By 2 p.m., he had returned the New Jersey rental car at Newark airport and was on his way home.¹¹⁶ He picked up the Florida rental car at the Tampa airport the evening of February 2, 2010, incurring a \$33 parking fee.¹¹⁷ On February 3, 2010, Hank Abbott returned the Florida rental car at the Tampa airport and left for a board meeting in Hawaii.¹¹⁸

The Florida rental car cost a total of \$1,766.58. The entire amount was allocated to the Funds.¹¹⁹

The business justification for allocating the Florida rental car expense to the Funds was that Hank Abbott had prepared for a quarterly business development meeting and transported employees from the airport. But that meeting had occurred from January 27 through January 29, 2010,¹²⁰ and had concluded by the time that Hank Abbott went to New Jersey for his hair restoration treatment. He said nothing at the hearing about transporting any employees to or from the Tampa airport on February 1-2, 2010.

The parking fee of \$33 also was allocated to the Funds.¹²¹

The New Jersey rental car cost \$137.97 for the evening and morning that Hank Abbott had it. That expense was allocated to the Funds.¹²²

¹¹¹ Hearing Tr. (HAbbott) 889-90.

¹¹² Hearing Tr. (HAbbott) 874-75, 881; CX-190.

¹¹³ Hearing Tr. (HAbbott) 881-83.

¹¹⁴ Hearing Tr. (HAbbott) 886-87.

¹¹⁵ Hearing Tr. (HAbbott) 888-89.

¹¹⁶ Hearing Tr. (HAbbott) 881.

¹¹⁷ Hearing Tr. (HAbbott) 883-34.

¹¹⁸ Hearing Tr. (HAbbott) 870-71, 875.

¹¹⁹ Hearing Tr. (HAbbott) 874-78; CX-190; CX-6, at 20.

¹²⁰ Hearing Tr. (HAbbott) 877-880.

¹²¹ Hearing Tr. (HAbbott) 881.

¹²² Hearing Tr. (HAbbott) 885; CX-191.

Springsteen-Abbott provided FINRA staff a business justification for the allocation of the New Jersey rental car cost to the Funds. The business justification was that Hank Abbott was "flying from BDM meeting back to Pennsylvania" [referring to the business development meeting] via Newark, New Jersey, before another meeting not specifically identified. The documentation provided in support of that business justification was the same documentation that was provided to support the business purpose of the Florida car rental. The receipt for the New Jersey car rental was marked in handwriting "Transp. for BDM" referring to the business development meeting and the transportation of employees for that purpose.¹²³

Although Hank Abbott agreed that the expense for his hair restoration appointment was not a business expense, he insisted that the car rentals and parking still could be properly charged to the Funds, depending on whether he had another appointment while he was in New Jersey.¹²⁴ He denied that the real purpose of the trip was for him to take care of himself just a few days before going to Hawaii. But he acknowledged that he had no documentation to support that belief.¹²⁵ He did not mention any transport for a meeting that he might have done while in New Jersey. Hank Abbott's testimony was, "I rented that vehicle [the New Jersey car rental] so that I could take care of whatever purpose I had there, which included that appointment in Paramus, New Jersey [at the hair restoration company]."¹²⁶ He did not identify any business purpose and there was no evidence that there was one.

The Extended Hearing Panel finds that at least some portion of the Florida car rental was improperly allocated to the Funds, because the car was used, at least in part, for personal purposes. The Extended Hearing Panel further finds that the parking fee was improperly allocated to the Funds, and the entire cost of the New Jersey car rental was improperly allocated to the Funds. Hank Abbott's testimony regarding this subject was not credible. He could not identify a single business activity he undertook during his trip to New Jersey; he simply maintained that he needed the New Jersey rental car "to take care of whatever purpose" he had there. In addition, the Extended Hearing Panel finds that the documentation provided to justify the business expense was false, and that it was created with the knowledge that Hank Abbott had no documentation or memory as to any business activity conducted during his brief time in New Jersey. The sole purpose of Hank Abbott's trip was to obtain hair restoration services.

April 2010. In 2010, Hank Abbott and his wife spent the Good Friday-Easter weekend in Jersey City, New Jersey, where one of Hank Abbott's daughters lives. They drove to New Jersey, stopping to charge \$37.14 for gas. They checked into a hotel there on Friday, April 2,

¹²³ Hearing Tr. (HAbbott) 884-86; CX-191.

¹²⁴ Hearing Tr. (HAbbott) 889-93.

¹²⁵ Hearing Tr. (HAbbott) 893-95.

¹²⁶ Hearing Tr. (HAbbott) 891.

2010, and checked out on April 4, 2010. On Friday, Hank Abbott went to JA Alternatives for another hair restoration treatment.¹²⁷

Friday evening, Hank Abbott had dinner with his best friend, SM, Springsteen-Abbott, and SM's wife at a restaurant in Englewood, New Jersey, called the Assembly Steakhouse. The dinner cost \$472.67 plus a \$100 tip.¹²⁸ Then Hank Abbott and SM went next door to The Bicycle Club for drinks. The bar bill was \$60.50.¹²⁹

The Assembly Steakhouse dinner was included in the original Complaint as an alleged misallocated expense. Springsteen-Abbott responded with a business purpose set forth on a schedule. She indicated the business purpose for the Assembly Steakhouse dinner was that she and her husband were interviewing SM for a potential position in the Florida office setting up a security department. Hank Abbott testified that they were having some problems with homeless people and crime in the building and thought SM could help them with those problems.¹³⁰ This particular expense was dropped from the Amended Complaint, apparently because a memorandum was provided to FINRA staff showing that Hank Abbott had instructed that it be allocated to the Parent Company.¹³¹ Hank Abbott testified, however, that he still thought it was appropriate to charge the Assembly Steakhouse dinner to the Funds because he was attempting to persuade SM to relocate from Long Island to Florida.¹³²

Springsteen-Abbott also allocated the bar charge to the Funds. That expense was not dropped from the Amended Complaint. Springsteen-Abbott's business justification for the bar bill was different than the one that had been provided for the dinner with SM. The tick sheet indicated that the bar discussion had to do with photography services.¹³³ Hank Abbott testified that SM had previously done a couple of photography jobs for the Commonwealth companies and that he had done them at a reasonable rate. Hank Abbott suggested that the purpose of the dinner was to reward SM for his previous work. Hank Abbott concluded, "[W]e think it is to our benefit and the funds' benefit to occasionally reward him for that."¹³⁴

¹²⁷ Hearing Tr. (HAbbott) 917; CX-129, at 332.

¹²⁸ Hearing Tr. (HAbbott) 918-29.

¹²⁹ Hearing Tr. (HAbbott) 928-32; CX-188.

¹³⁰ Hearing Tr. (HAbbott) 920-25.

¹³¹ Hearing Tr. (HAbbott) 922-26; CX-240. The evidence regarding the memorandum created a suspicion that it had been created well after its purported date, for the purpose of allaying regulatory concerns about the allocation of the Assembly Steakhouse dinner to the Funds. However, the Extended Hearing Panel makes no finding in that regard.

¹³² Hearing Tr. (HAbbott) 924-26.

¹³³ Hearing Tr. (HAbbott) 929-33; CX-188.

¹³⁴ Hearing Tr. (HAbbott) 932. A FINRA examiner testified that SM did the photography for an awards dinner for the Parent Company every year. This was not an expense allocable to the Funds. Hearing Tr. (Edwards) 469-71; CX-93.

Saturday of that Easter weekend, Hank Abbott, Springsteen-Abbott, one of his daughters and her husband ate at a restaurant in Jersey City called Porto Leggero. The meal cost \$432.06.¹³⁵ Springsteen-Abbott allocated the expense to the Funds. She later provided two different business justifications. On the schedule of charges, the meal was described as relating to business succession.¹³⁶ On the tick sheet provided to FINRA staff, the meal was described as a board of directors' discussion and interview.¹³⁷

Hank Abbott testified that the purpose of the meal at Porto Leggero was to discuss succession planning. When Springsteen-Abbott took control of the Commonwealth business, she obtained certification as a woman-owned business that made Commonwealth a diversity-qualified supplier to anyone who leases equipment from it. In order to maintain its certification, Commonwealth had to have a succession plan that preserved its status as a majority woman-owned company.¹³⁸

Sunday of that weekend, Hank Abbott had a meal with his other daughter who lives in Ridgefield, Connecticut. They ate at the Fifty Coins Restaurant. The meal cost \$72.28 and was billed to the Funds.¹³⁹ He testified that it was for the same purpose, to discuss succession planning.¹⁴⁰

The Extended Hearing Panel finds that the purpose of the weekend was for Hank Abbott to go to his hair restoration appointment and for him and his wife to spend the holiday weekend with family and friends. The Extended Hearing Panel finds that all the alleged improper charges related to this trip in the Amended Complaint were improperly allocated to the Funds. Those charges include the charge for gasoline, a bar bill, and the expenses for both the meals with Hank Abbott's daughters. The Extended Hearing Panel further finds that Hank Abbott's testimony regarding the Easter weekend charges was evasive and intended to obscure the true nature of the weekend. His assertion that the Funds were benefited by his treating his best friend to drinks at a bar is ludicrous. The inconsistent and false business justifications provided by Springsteen-Abbott further damaged her credibility.

September 24-26, 2010. Hank Abbott went to another hair restoration appointment at JA Alternatives on Saturday, September 25, 2010, as shown by the charge on the American Express card that he used for both personal and business expenses.¹⁴¹

¹³⁵ Hearing Tr. (HAbbott) 940-43; CX-189.

¹³⁶ Hearing Tr. (HAbbott) 942; CX-6, at 24.

¹³⁷ Hearing Tr. (HAbbott) 941-42; CX-189.

¹³⁸ Hearing Tr. (HAbbott) 1027-29.

¹³⁹ Hearing Tr. (HAbbott) 943-44.

¹⁴⁰ Hearing Tr. (HAbbott) 1027-29.

¹⁴¹ Hearing Tr. (HAbbott) 898-902; CX-129, at 465.

The American Express bill paints a picture of Hank Abbott's activity surrounding the hair restoration appointment. He returned a rental car in Orlando, Florida, on Friday, September 24, 2010, that he had rented two weeks before in Tampa. Then, he and Springsteen-Abbott flew from Orlando to Philadelphia. A limousine charge on September 24, 2010, suggests that he and Springsteen-Abbott were picked up at the airport. The next day, Saturday, September 25, 2010, Hank Abbott drove to Paramus, New Jersey. He shopped at Century 21 in Paramus and charged \$24.58. He shopped at a Best Buy, where he charged \$43.86. He went to his hair restoration appointment. He also charged \$41.82 for gas for his drive home. The following day, Sunday, September 26, 2010, he and Springsteen-Abbott had tickets to fly from Philadelphia to Tampa. They appear to have used them since Hank Abbott also incurred a charge that day for in-flight internet.¹⁴²

Thus, the credit card charges show that Hank Abbott flew up to Philadelphia at the beginning of the weekend, drove to Paramus on Saturday for his hair restoration appointment, did a little shopping, and then drove back to Philadelphia. The following day, on Sunday, he and Springsteen-Abbott returned to Florida.

Both the Century 21 charge and the Best Buy charge were initially allocated to the Funds.¹⁴³ The tick sheet for the Century 21 charge showed no business explanation. Instead, it simply referred to the Parent Company.¹⁴⁴ Hank Abbott testified that the reference could mean that the Parent Company had originally borne the expense, ignoring that tick sheets were only created for expenses that had been allocated to the Funds and that were alleged by FINRA staff as improper allocations.¹⁴⁵ The gas Hank Abbott bought for the drive home was also allocated to the Funds.¹⁴⁶ He admitted that the investors in the Funds should not pay for the gasoline, but testified that he did not know whether it was allocated to them.¹⁴⁷

The Extended Hearing Panel finds that the Century 21 and Best Buy charges, as well as the gas charge, were all allocated to the Funds improperly. There was no business justification. The Extended Hearing Panel further finds that Hank Abbott's testimony regarding these charges was evasive and lacked credibility. He suggested that the charges allocated to the Funds in connection with this trip could have been justified because he spends a lot of time on business in Northern New Jersey and Connecticut, and these are routine places for him to go for business. However, he could not recall any business purpose for anything he did that weekend in and

¹⁴² Hearing Tr. (HAbbott) 898-902; CX-129, at 464-66.

¹⁴³ Expense Schedule at 19, items 1284 and 1285. The Schedule of expenses that Enforcement alleged were improperly allocated to the Funds included other charges made during this weekend trip, but the other expenses were not the subject of testimony.

¹⁴⁴ Hearing Tr. (HAbbott) 899-901; CX-192.

¹⁴⁵ Hearing Tr. (HAbbott) 905.

¹⁴⁶ Expense Schedule at 19, item 1288.

¹⁴⁷ Hearing Tr. (HAbbott) 903-04.

around Paramus. He simply refused to admit that the purpose of the trip was for his hair restoration appointment.¹⁴⁸

January 6-9, 2011. Hank Abbott and Springsteen-Abbott stayed in Ridgefield, Connecticut, the weekend of January 6-9, 2011. Hank Abbott's daughter was expecting a baby in March 2011, and there was a January baby shower that many family and friends attended that weekend.

On his way to Connecticut, on Thursday, January 6, 2011, Hank Abbott went to JA Alternatives, the hair restoration company in Paramus, New Jersey.¹⁴⁹ He and Springsteen-Abbott arrived in Ridgefield that evening and checked into a hotel. The next day, Friday, January 7, 2011, Hank Abbott incurred a meal charge of \$47.59 at the Asian Kitchen in Ridgefield. He also incurred a meal charge of \$404.43 at Bernard's, a Ridgefield restaurant where his daughter's baby shower was held. He incurred a second, smaller charge at Bernard's for \$44.04. On Saturday, January 8, 2011, he shopped at Best Buy in Danbury, Connecticut, and incurred a charge for \$174.86. On Sunday, before driving home, he filled his car with gas, at a cost of \$56.18.¹⁵⁰

Springsteen-Abbott initially allocated to the Funds four of her husband's charges on this trip: \$47.59 (Asian Kitchen), \$44.04 (Bernard's), \$174.86 (Best Buy), and \$56.18 (gas). Later, she reallocated the Best Buy charge. Hank Abbott testified that they sought to find a receipt to determine what he bought but they could not find any documentation, and he had no recollection of what he purchased.¹⁵¹

Springsteen-Abbott provided a business justification for the \$44.04 Bernard's charge that did not match the event. The justification had to do with a parking garage charge in a slightly different amount. Hank Abbott testified that the \$44.04 Bernard's charge was for a quick dinner with Springsteen-Abbott and his sister, RF, to discuss a wholesale report.¹⁵² However, Hank Abbott incurred a charge for a meal that same day at Bernard's for \$404.43 (which was not allocated to the Funds). It is unclear if or how that larger meal expense related to the claimed dinner for \$44.04.¹⁵³ Although it cannot be determined with certainty, the smaller bill is more consistent with a bar charge before or after the expensive meal at the same restaurant.

The Extended Hearing Panel finds that the weekend was for the purpose of Hank Abbott going to a hair restoration appointment and for him and Springsteen-Abbott to attend the baby

¹⁴⁸ Hearing Tr. (HAbbott) 905-06.

¹⁴⁹ Hearing Tr. (HAbbott) 949-52.

¹⁵⁰ Hearing Tr. (HAbbott) 949-66.

¹⁵¹ Hearing Tr. (HAbbott) 1023-24. Enforcement included the Best Buy charge in its initial Complaint, but not the Amended Complaint. Springsteen-Abbott claimed that the charge was reallocated to the Parent Company. Hearing Tr. (HAbbott) 961-62.

¹⁵² Hearing Tr. (HAbbott) 956-61.

¹⁵³ Hearing Tr. (HAbbott) 1025-27.

shower. Accordingly, Hank Abbott's expenses should not have been allocated to the Funds. These include the charges for the two meals (or meal and bar bill), and the gas charge. The Extended Hearing Panel further finds that Hank Abbott's testimony was not credible, and that Springsteen-Abbott provided a false business justification for the \$44.04 Bernard's charge.

(4) February: Best Buy Purchase

On February 22, 2010, Hank Abbott charged \$213.98 on the American Express card. The charge related to a purchase made at a Best Buy in Clearwater, Florida. It was for a Motorola Bluetooth speaker and an XM SkyDock, an in-vehicle satellite radio. Springsteen-Abbott allocated the charge to the Funds.¹⁵⁴

When FINRA staff questioned Springsteen-Abbott in her investigative testimony regarding this charge, she explained the business purpose for the purchase. She claimed that the speaker and satellite radio were an incentive gift for a potential wholesaler candidate her company was trying to lure from a competitor. She identified the candidate as IK. However, when FINRA staff looked up IK's information in the Central Registration Depository ("CRD"), they learned that IK was unemployed from October 2005 through April 2010.¹⁵⁵

The FINRA examiner explained that, after she conducted research regarding IK and the Best Buy purchase, the staff became concerned about the pattern of Best Buy charges in large dollar amounts in locations where Springsteen-Abbott and her husband and their family and friends lived. The staff prepared a chart of twenty Best Buy charges that were allocated to the Funds and asked for receipts showing what was purchased.¹⁵⁶

While Enforcement did not offer proof as to every item on the Best Buy list, the chart served as an explanation of the reason for the staff's general concern about Best Buy charges allocated to the Funds. Although Springsteen-Abbott's counsel indicated that he planned to offer evidence to rebut the inference that Springsteen-Abbott's business justification for the particular Best Buy purchase relating to IK was false, no such evidence was offered.¹⁵⁷

The Extended Hearing Panel finds that the amount charged in connection with this Best Buy purchase was improperly charged to the Funds. Springsteen-Abbott's claim that the items were purchased to lure IK away from a competitor is inconsistent with the staff's discovery that IK was unemployed at the time of the purchase and had been unemployed more than four years. On that basis, the Extended Hearing Panel rejects Springsteen-Abbott's claim that the charge was for a business purpose. The Extended Hearing Panel further finds that Springsteen-Abbott

¹⁵⁴ Hearing Tr. (Edwards) 250-54; CX-86.

¹⁵⁵ Hearing Tr. (Edwards) 251-53.

¹⁵⁶ Hearing Tr. (Edwards) 255-59. The FINRA examiner testified that Springsteen-Abbott allocated to the Funds twenty charges at Best Buy during the review period from 2009 through 2011, for a total of \$4,987.25. Hearing Tr. (Edwards) 254-57.

¹⁵⁷ Hearing Tr. (objection by Respondent's counsel) 257-58.

intentionally provided a false justification for the Best Buy charge. It is impossible to believe that the description of an attempt to lure IK away from a competitor was an inadvertent mistake.

(5) March: Baptism In Texas

The weekend of March 26, 2011, Springsteen-Abbott and her husband flew to Texas for the baptism of a child of Springsteen-Abbott's niece. The baptism occurred on a Saturday, after a 5 p.m. mass. Close to midnight that same evening, Hank Abbott charged his American Express card at TGI Friday's for \$85.08. He testified that the charge was for a meal he and his wife had with his wife's nephew to interview the nephew for a position in relationship management. Springsteen-Abbott allocated that expense to the Funds initially but later reallocated it to the Parent Company.¹⁵⁸

The Extended Hearing Panel finds that the original charge to the Funds was improper, and that Hank Abbott's testimony regarding the business purpose for the TGI Friday's charge was not credible. It is unlikely that Hank Abbott and his wife were conducting a business interview in a restaurant close to midnight, and it is unlikely that such an interview would take place on a non-work day of a special family event. The charge is more consistent with a bar bill after a family celebration.

(6) April: Wedding Anniversary Dinners

April 2009. Sunday, April 19, 2009, was Springsteen-Abbott and her husband's first wedding anniversary. Springsteen-Abbott allocated to the Funds a dinner that evening at a restaurant in Clearwater, Florida, called Teo Pepe. That dinner cost a total of \$293.06. In a post-Complaint production, Springsteen-Abbott provided a tick sheet with a business justification for the dinner. The tick sheet claimed that the purpose of the expense was a leasing meeting and that the meeting was attended by several people, not including Springsteen-Abbott. As documentary support, an email was attached discussing a different event at a different time. The email attached to support the allocation asked Springsteen-Abbott if one of her team members could be available for a meeting on Monday afternoon, April 20, 2009, about an ELFA Funding Exhibition. In a separate paragraph, the author of the email wished Springsteen-Abbott a "wonderful weekend."¹⁵⁹

The Extended Hearing Panel finds that the dinner was improperly allocated to the Funds, because the documentation provided to support the allocation, which had to do with a Monday afternoon meeting involving Springsteen-Abbott, did not match the event as described in the tick sheet, a Sunday night dinner without Springsteen-Abbott.

Although the email wishing Springsteen-Abbott a wonderful weekend is consistent with the Teo Pepe dinner being part of a wedding anniversary celebration, the Extended Hearing

¹⁵⁸ Hearing Tr. (HAbbott) 971-77, 1022-23; Hearing Tr. (Edwards) 247.

¹⁵⁹ Hearing Tr. (Springsteen-Abbott) 724-26; CX-129, at 89; CX-156; CX-157.

Panel cannot conclude with certainty that the dinner was part of an anniversary celebration. In her testimony, Springsteen-Abbott volunteered, somewhat disdainfully, that she would “never go there” for her anniversary, referring to the Teo Pepe restaurant.¹⁶⁰ In the Extended Hearing Panel’s view, this was one of Springsteen-Abbott’s few candid comments at the hearing. She explained that she and her husband had celebrated their wedding anniversary at the Plaza in New York City the weekend before.

April 2011. Springsteen-Abbott and her husband celebrated their third wedding anniversary during a weekend trip to New York City in mid-April 2011. Springsteen-Abbott testified that, although they celebrated their anniversary in New York and went to an event called the Leatherneck Ball that weekend, their New York trip and attendance at the Ball were business related because they were invited by a client, Northrop Grumman. On that trip, they incurred a charge at the Oak Room on Saturday, April 16, 2011, in the amount of \$71.72. That expense was allocated to the Funds.

A tick sheet in Springsteen-Abbott’s handwriting was provided in a post-Complaint production. It showed a business justification for the allocation to the Funds. The business justification indicated that the expense was for drinks with a leasing contact. The expense was designated for reallocation to the Parent Company in August 2012, around the same time that FINRA staff issued its Wells notice indicating that it was planning to bring a proceeding against Springsteen-Abbott in connection with her allocation of expenses to the Funds. Springsteen-Abbott testified that she reallocated the expense to the Parent Company because it involved alcohol. She testified that she personally thought it was inappropriate to charge the Funds for a meeting that just had alcohol, although, at the same time, she maintained that it would have been permissible to charge the Funds for the drinks.¹⁶¹

The Extended Hearing Panel finds that the charge was improperly allocated to the Funds. On other occasions, Springsteen-Abbott allocated to the Funds expenses for alcohol alone, making her proffered reason for the reallocation suspect.¹⁶² Furthermore, if she truly had a personal principle of not charging the Funds for alcohol, then she would have never allocated the drinks at the Oak Room to the Funds in the first place. The Extended Hearing Panel finds that Springsteen-Abbott’s testimony regarding the initial allocation and subsequent reallocation is not trustworthy. The Extended Hearing Panel also notes that Springsteen-Abbott’s reallocation of the charge only occurred after the application of regulatory scrutiny.

On Tuesday, April 19, 2011, the actual day of their third wedding anniversary, Springsteen-Abbott and her husband attended a dinner at the Villa Gallace in Indian Rocks, Florida. The dinner cost \$220.83. The expense was allocated to the Funds.

¹⁶¹ Hearing Tr. (Springsteen-Abbott) 719-23, 832-34.

¹⁶¹ Hearing Tr. (Springsteen-Abbott) 719-23, 832-34.

¹⁶² See, for example, the Good Friday-Easter weekend charge for Hank Abbott to treat SM, his best friend, to drinks, which is discussed above.

Springsteen-Abbott provided a tick sheet with the business justification for the allocation. It claimed that five people, including herself and her husband, attended the dinner, and that the dinner was for the purpose of "Minority Alliance Capital dinner, Diversity Bank." Springsteen-Abbott testified that the dinner was not an anniversary dinner with her husband.¹⁶³

Springsteen-Abbott was shown an email that she sent her brother-in-law earlier in the day on April 19, 2011. In that email, she told her brother-in-law that she and her husband were going out that evening for their anniversary. Even after she was shown the email, she denied that the dinner was an anniversary dinner for her and her husband.¹⁶⁴

The Extended Hearing Panel finds that Springsteen-Abbott improperly allocated the dinner to the Funds. The Extended Hearing Panel finds Springsteen-Abbott's testimony that the dinner was not an anniversary celebration was not credible, because the email to her brother-in-law is inconsistent with her testimony.

(7) May: Mother's Day Family Meals

May 9, 2010. Springsteen-Abbott allocated to the Funds a meal charge on Mother's Day, May 9, 2010, at the Terrace Restaurant at Longwood Gardens. The amount of the charge was \$241.93. Springsteen-Abbott provided a tick sheet stating that due diligence and facilities issues were discussed. At the hearing, Springsteen-Abbott denied that this was a Mother's Day meal with her family. Then she was shown an email that she sent the next day that described the Longwood Garden visit as a family outing with her son and his wife and the grandchildren. Nevertheless, she continued to insist that it was not a family meal.¹⁶⁵

She testified that she believes that the Longwood Gardens dinner was a legitimate business expense. She said that her husband had suggested that they go there to walk around and then eat. She said that they typically will do work when they sit and eat.

Springsteen-Abbott's husband surprised her by arranging for her daughter to fly in from out of town and join them at Longwood Garden. Her son also joined them. They had a meal together but, according to Springsteen-Abbott, they also worked at that meal. Her grandchildren were there, but she said that they did their thing and she did hers. She also said that she did not believe she should be penalized because her husband surprised her.¹⁶⁶

The Extended Hearing Panel finds that the Mother's Day meal was improperly allocated to the Funds. The Extended Hearing Panel further finds that Springsteen-Abbott provided a false and misleading business justification on the tick sheet, and that her testimony that this was not a family meal was impeached.

¹⁶³ Hearing Tr. (Springsteen-Abbott) 715-17; CX-155.

¹⁶⁴ Hearing Tr. (Springsteen-Abbott) 718-19; CX-232.

¹⁶⁵ Hearing Tr. (Springsteen-Abbott) 711-15; CX-154; CX-231.

¹⁶⁶ Hearing Tr. (Springsteen-Abbott) 827-29.

May 8, 2011. On Mother's Day, May 8, 2011, Hank Abbott incurred a charge for \$141.28 for a meal at the Outback Steakhouse in Glen Mills, Pennsylvania. Springsteen-Abbott allocated the expense to the Funds and provided a business justification that it was to "discuss FINRA situation and plan document project." However, this was four months before the beginning of the examination.¹⁶⁷ Later in his testimony, Hank Abbott explained that the business justification had been inaccurate. He then claimed that they had discussed an SEC audit that took place around the time of Mother's Day 2011.¹⁶⁸

The Extended Hearing Panel finds that the Mother's Day meal was improperly allocated to the Funds. The vague business justification first offered to justify the allocation to the Funds was insufficient and not credible. Hank Abbott's later assertion that they were discussing an SEC audit was similarly insufficient and not credible. Finally, even if Hank Abbott's testimony were true, a meal to discuss an SEC audit appears to concern the Broker-Dealer and not the Funds' business. Thus, the allocation was improper under any version of the facts.

(8) May: Memorial Day Weekend Expense At The Bicycle Club

May 2010. According to the American Express bill, on the Friday before Memorial Day, May 28, 2010, Hank Abbott incurred a charge for hair restoration services at JA Alternatives in Paramus, New Jersey. He also incurred a charge for \$750.07 at a restaurant in Englewood, New Jersey, called Grissini.¹⁶⁹ Neither of these expenses was allocated to the Funds. However, another charge for \$111.33 that he incurred at a different restaurant in Englewood, New Jersey, called The Bicycle Club, was allocated to the Funds.¹⁷⁰

Springsteen-Abbott provided a tick sheet claiming that the charge at The Bicycle Club was for dinner for three people (Hank Abbott, RD, and MJ). The purpose on the tick sheet was simply "Allied Health." Springsteen-Abbott testified that the dinner had to do with an Allied Health site visit.¹⁷¹ The receipt attached to the tick sheet showed that the party had been served by a bartender and that they finished around 6:30 p.m.¹⁷²

During the investigation, FINRA staff called MJ and discussed with him the Memorial Day 2010 charge at The Bicycle Club. The staff did so because they had reviewed an email written by Springsteen-Abbott to her sister a few days before the purported site visit in which Springsteen-Abbott said that she was in the process of planning a birthday party in New York for her husband, and they were going to New York over Memorial Day weekend to look at a facility

¹⁶⁷ Hearing Tr. (HAbbott) 977-83.

¹⁶⁸ Hearing Tr. (HAbbott) 1020-21.

¹⁶⁹ CX-129, at 372.

¹⁷⁰ CX-129, at 372; Hearing Tr. (Springsteen-Abbott) 797-99.

¹⁷¹ Hearing Tr. (Springsteen-Abbott) 798.

¹⁷² CX-203.

for the birthday party.¹⁷³ Consistent with that email, on the Saturday of that weekend, the American Express bill shows that Hank Abbott incurred a charge in New York City at the Stumble Inn, which is adjacent to the Havana Room where his birthday party was later held.¹⁷⁴

MJ denied he that he was at The Bicycle Club on that Friday of Memorial Day Weekend on a business trip. He told the staff that he never traveled to New York for work while employed by the Parent Company. He said that he only traveled once for work while employed there, and that was to California.¹⁷⁵

At some point in the investigation and proceeding, Springsteen-Abbott became aware that MJ had told the staff he never traveled to New York for work and was not at The Bicycle Club.¹⁷⁶ On April 29, 2014, about a week-and-a-half before the hearing, Springsteen-Abbott submitted an unnotarized document purporting to be an attestation by David Borham, her son. The attestation was dated April 12, 2014. In the document, Borham asserted that he, and not MJ, had been on the trip to Allied Health. He called it “the Allied Health lease mission, to force the owner to submit some form of payment on the leases....” He claimed, “Hank was able to secure a payment check from the owner for the Allied leases and we were able to inspect some equipment in their offices. On the way and after we were done, we stopped to have a meal, due to the distance from home, as well as it was a long day.”¹⁷⁷

Enforcement introduced examples of Borham’s signature on sign-in sheets for training events. The signatures on those documents looked different than the signature on the unnotarized attestation. Springsteen-Abbott agreed that the signatures looked different. However, she testified that without a doubt it was her son’s signature on the attestation, and suggested that the signatures looked different because her son has had two extensive back surgeries.¹⁷⁸

Borham testified that he signed the attestation on April 12, 2014. He also testified that he went on the trip to New Jersey “to see somebody with Allied Healthcare.” He testified that he was the third person at The Bicycle Club, and not MJ. Borham said that he signed the attestation after his mother called him and told him that “she needed me to tell the FINRA people what actually happened on that specific day.” She provided a typed document to him by fax, and he signed it.¹⁷⁹

¹⁷³ Hearing Tr. (Edwards) 126-32.

¹⁷⁴ CX-129, at 372; Hearing Tr. (Edwards) 120-21.

¹⁷⁵ Hearing Tr. (Edwards) 130-31.

¹⁷⁶ Hearing Tr. (Springsteen-Abbott) 799.

¹⁷⁷ RX-48.

¹⁷⁸ Hearing Tr. (Springsteen-Abbott) 799-807, 818-19; CX-61, at 4; CX-63, at 7; CX-90, at 8; CX-137, at 4.

¹⁷⁹ Hearing Tr. (Borham) 1199-1206.

Borham testified that it was a one-day trip. They started in Philadelphia, went to New Jersey, and returned to Philadelphia that evening. He thought that he got home at 8 p.m.¹⁸⁰

The Hearing Panel finds that the charge at The Bicycle Club was improperly allocated to the Funds.

The proven facts are inconsistent with the assertions made in the Borham attestation about a long, one-day business trip: Hank Abbott spent at least some of that Friday at the hair restoration company; he finished at The Bicycle Club at 6:30 p.m.; and then he incurred an expensive dinner charge later that evening at Grissini. Borham may have gone on some trip to Allied Health that fits the description in his attestation, but it is not consistent with the facts that his trip was the one associated with the charge on Friday, May 28, 2010.

Moreover, the Borham attestation is suspect for other reasons. It was not drafted by Borham, but, rather, was provided to him by Springsteen-Abbott. It does not appear to have been signed by him, as Springsteen-Abbott admitted, and her explanation for the difference between the signature on it and Borham's signature on other documents is not credible. She claimed the difference was because of two back surgeries he had. He testified, however, that one surgery occurred a year and a half before the hearing, and the other occurred a year before that.¹⁸¹ The Extended Hearing Panel does not believe that the surgeries explain why the signature on the attestation looks markedly different from Borham's signatures on other documents.

In addition, the FINRA examiner explained that the document appeared to her to be backdated. The examiner did not speak to MJ about the supposed business trip supporting the business nature of the charge at The Bicycle Club until April 16, 2014, and yet the attestation that was created in response was dated April 12, 2014.¹⁸²

Regardless of whether Borham signed the attestation or not, the Extended Hearing Panel believes the attestation was fabricated to conceal the personal nature of the expense incurred at The Bicycle Club.¹⁸³

¹⁸⁰ Hearing Tr. (Borham) 1202.

¹⁸¹ Hearing Tr. (Borham) 1205-06. Springsteen-Abbott tried to give a different gloss to the story about how the attestation came about in testimony she gave after she heard her son testify. She made it seem that he had volunteered that he, and not MJ, had been on the trip. Hearing Tr. (Springsteen-Abbott) 1317-19. This testimony seemed designed to diminish the impression that Springsteen-Abbott had sought and drafted the attestation. The Extended Hearing Panel does not find this self-serving testimony credible.

¹⁸² Hearing Tr. (Edwards) 1313-15; RX-48.

¹⁸³ That David Borham appeared and gave testimony at the hearing bolstering the statements in the attestation is viewed by the Extended Hearing Panel as an act of loyalty and support for his mother.

(9) June: Vacations, Including Disney Animal Kingdom

June 2009. As discussed above, Springsteen-Abbott allocated to the Funds some of the expenses of the 2009 birthday cruise to Alaska.

June 2010. Springsteen-Abbott also allocated to the Funds some expenses related to a birthday celebration in June 2010. She and her husband vacationed in Orlando, Florida, from June 3 to June 6, 2010, with her daughter, her then-son-in-law, and her two grandchildren. The whole family stayed at Disney's Animal Kingdom Lodge. Springsteen-Abbott allocated to the Funds credit card charges to the Animal Kingdom Lodge in the amount of \$2097.72.¹⁸⁴

The trip was two days after Springsteen-Abbott's birthday and one day after her grandson's birthday.¹⁸⁵ There was abundant evidence that the trip was a family vacation.¹⁸⁶

The Animal Kingdom charges that were allocated to the Funds included charges to various restaurants, room service, stroller rentals, directory assistance, and valet parking.¹⁸⁷ Those charges appeared on Springsteen-Abbott's credit card and were included in the American Express billing statement that she would have reviewed approximately fifteen days after the family ended their vacation and checked out of the hotel.¹⁸⁸

In addition, Springsteen-Abbott allocated to the Funds a car rental charge for the car that her husband drove from Tampa to Orlando and dropped off in Orlando at the end of the weekend of the family vacation.¹⁸⁹ She also allocated to the Funds the cost of water and medicine purchased at the airport the day they left Orlando.¹⁹⁰ Altogether, seven charges on this trip were allocated to the Funds.¹⁹¹

With respect to the stroller and similar charges, Springsteen-Abbott provided documentation in her February 2014 production indicating that Franceschina had mistakenly allocated the Disney charges as the Funds' expenses because she thought they related to a conference in Orlando around the same time. Franceschina did not know that the charges were for a stroller and the like because the specific charges were not separately itemized on the Disney bill.¹⁹²

¹⁸⁴ Stips. 13 and 14.

¹⁸⁵ Hearing Tr. (Springsteen-Abbott) 726-27; Hearing Tr. (Edwards) 88-89.

¹⁸⁶ Hearing Tr. (Edwards) 85-90, 99-100; CX-112 through CX-119.

¹⁸⁷ Hearing Tr. (Edwards) 90-92; CX-115.

¹⁸⁸ Hearing Tr. (Springsteen-Abbott) 729-31.

¹⁸⁹ Hearing Tr. (Edwards) 100-03; CX-120.

¹⁹⁰ Hearing Tr. (Edwards) 103-04; CX 121.

¹⁹¹ Hearing Tr. (Edwards) 104-06, 390-93; CX-122.

¹⁹² Hearing Tr. (Edwards) 392-95.

It was not clear that the Orlando conference was really at the same time. The FINRA examiner testified that it was in April, while the Disney trip was in June.¹⁹³ There was no evidence that Springsteen-Abbott ever signed up for a conference at the time of the Disney trip or attended one.

With respect to the car rental, Springsteen-Abbott's counsel asserted in questioning that Hank Abbott provided documentation to FINRA staff showing that he conducted some business during the trip to Disney and that he went on a business trip after he dropped the car off at the Orlando airport. Hank Abbott did not provide any testimony regarding what business he may have done on the Disney trip or afterward.¹⁹⁴

The Extended Hearing Panel finds that the charges associated with the Animal Kingdom family vacation were improperly allocated to the Funds. The preponderance of the evidence showed that the purpose of the weekend was a family birthday celebration. The proffered business justification for the car rental was too vague and unsubstantiated to overcome the evidence that the car was used for personal purposes. Even if the allocation of the stroller cost to the Funds was inadvertent, it illustrates how Springsteen-Abbott's system of charging personal and business expenses on the same card could be easily abused. The mistake would never have come to light without FINRA's scrutiny.

(10) November: Home Decorations

Springsteen-Abbott allocated a November 24, 2009, Home Depot expense to the Funds for \$239.86. Among the items included in the receipt were a "nutcracker" and a "grazing doe," along with something that appeared to be a 100-foot electrical cord. Springsteen-Abbott testified at the hearing that the grazing doe for the lawn was purchased for a business function that she and her husband held at their home for "management." She provided no detail about when the function was or who attended.¹⁹⁵

In a post-Complaint production, FINRA staff received a tick sheet for the Home Depot charges. Springsteen-Abbott admitted that the tick sheet and documentation for the allocation of the Home Depot charges to the Funds was provided to FINRA staff in the hope that the related claim would be dismissed. The tick sheet contained conflicting information. On the one hand, it said that the charges were for a manager's meeting before a CE meeting, and that the charges should have been allocated to the Parent Company. On the other hand, there is handwriting that says, "Personal Should not have been allocated."¹⁹⁶ At the hearing, Springsteen-Abbott testified

¹⁹³ Hearing Tr. (Edwards) 393-94.

¹⁹⁴ Hearing Tr. (Edwards) 396-97.

¹⁹⁵ Hearing Tr. (Edwards) 299-301, 304-06; Hearing Tr. (Springsteen-Abbott) 660-62; CX-140.

¹⁹⁶ Hearing Tr. (Springsteen-Abbott) 660-61; CX-140.

that the indication that the Home Depot charges were personal was inaccurate. She specifically denied that the grazing doe was a personal charge.¹⁹⁷

The Extended Hearing Panel finds that the Home Depot charges were improperly allocated to the Funds. The Extended Hearing Panel further finds that Springsteen-Abbott's assertion at the hearing that the decoration for her lawn was a legitimate business expense because she held a party for "management" at her house to be vague and unsubstantiated.

(11) November: Thanksgiving Dinner 2009

Springsteen-Abbott allocated two charges to the Funds that were incurred on Thanksgiving Day 2009 at the Dilworthtown Inn in West Chester, Pennsylvania. The first was for \$439.11 and the second was for \$20.50. The credit card for the first charge was swiped a little after 5 p.m., and then the card was swiped for the second charge approximately fifteen minutes later.¹⁹⁸

Springsteen-Abbott admitted at the hearing that the \$439.11 charge was for her family's Thanksgiving dinner.¹⁹⁹ She further admitted that the allocation to the Funds of the Thanksgiving dinner charge "should have never happened."²⁰⁰ She also acknowledged that when she allocated the Thanksgiving dinner charge to the Funds, it was shortly after receiving the monthly bill.²⁰¹ The smaller charge appears to have been a bar charge, although Springsteen-Abbott testified that she did not know whether it was.²⁰²

In a post-Complaint production, FINRA staff received a tick sheet with a business justification for the meal. The tick sheet indicated that the charge related to a CE, Firm Element event.²⁰³ Springsteen-Abbott explained that the erroneous attribution of the charge to a CE event occurred because of an error in the date on a checklist. The charge on the checklist was dated 2011 instead of 2009.²⁰⁴

However, upon further questioning, Springsteen-Abbott acknowledged that there had been a CE event at the Dilworthtown Inn the week after Thanksgiving 2009, in December.²⁰⁵ The record reflects a charge for meals at the Dilworthtown Inn on December 4, 2009, in the

¹⁹⁷ Hearing Tr. (Springsteen-Abbott) 661.

¹⁹⁸ Hearing Tr. (Springsteen-Abbott) 647-50; CX-135, CX-136.

¹⁹⁹ Hearing Tr. (Springsteen-Abbott) 650.

²⁰⁰ Hearing Tr. (Springsteen-Abbott) 651-52.

²⁰¹ Hearing Tr. (Springsteen-Abbott) 651.

²⁰² Hearing Tr. (Springsteen-Abbott) 649.

²⁰³ Hearing Tr. (Springsteen-Abbott) 649-52; CX-136.

²⁰⁴ Hearing Tr. (Springsteen-Abbott) 651.

²⁰⁵ Hearing Tr. (Springsteen-Abbott) 652.

amount of \$5,888.22, that was attributed to a Firm Element business purpose.²⁰⁶ The backup documentation for that expense is a mix of 2011 and 2012 Firm Element agendas and sign-in sheets and the like.²⁰⁷ It is apparent from those materials that Firm Element events generally involve fifteen to twenty people and involve a whole day of training plus meals, which explains why the Firm Element expense had to be more than the \$439 family Thanksgiving dinner that Springsteen-Abbott allocated to the Funds.

The Extended Hearing Panel finds that the two charges at the Dilworthtown Inn on Thanksgiving Day 2009 were improperly allocated to the Funds. They were incurred for a family dinner and a bar charge, not the Funds' business. The Extended Hearing Panel further finds that the improper allocation of these charges was made too close in time to the dinner to have been an inadvertent mistake, and Springsteen-Abbott offered no explanation for the misallocation of these charges to the Funds.

The Extended Hearing Panel also finds that the tick sheet provided to FINRA staff as the business justification for the dinner charge was false and was created under suspicious circumstances. Although Springsteen-Abbott claimed that the tick sheet was erroneous because of confusion about the dates, the tick sheet explanation relates to an actual event at the Dilworthtown Inn not long after the Thanksgiving dinner in 2009. Springsteen-Abbott, who testified that she closely supervised the post-Complaint productions, had to have known that a dinner charge under \$450 could not be for a day-long Firm Element event involving fifteen to twenty people. Overall, it appears to the Extended Hearing Panel that the business justification provided for the initial allocation to the Funds was purposefully false and misleading.

Springsteen-Abbott's failure to allocate expenses appropriately is only confirmed by the business justification she offered for the Thanksgiving Day dinner. She attempted to justify the allocation by asserting that the expense was for training for Broker-Dealer employees. Even her purported justification had to do with Broker-Dealer business, not the Funds' business.

Finally, the Extended Hearing Panel finds that Springsteen-Abbott knew that it was improper to charge her family Thanksgiving meal to the Funds. She admitted that it should never have happened.

(12) December: Year-End Holiday Meals

December 27, 2009. Springsteen-Abbott allocated to the Funds a charge for \$826.08 for dinner on December 27, 2009, at a restaurant in New York City called Broadway Joe's. In connection with a post-Complaint production, she prepared and provided a tick sheet indicating

²⁰⁶ CX-137, at 2-3.

²⁰⁷ CX-137, at 4-19.

the business justification for allocating the expense to the Funds. The tick sheet said “Met with leasing vendors for year end.”²⁰⁸

At the hearing, Springsteen-Abbott admitted that the dinner was a dinner with her family. She was shown a hotel booking confirmation that showed she had booked three junior suites at a hotel in Times Square for three couples and three children for the same night as the dinner. The rooms were booked for herself, her son, and her daughter. Springsteen-Abbott admitted that the tick sheet she prepared and drafted as a business justification for the allocation to the Funds was inaccurate.²⁰⁹ She testified that she later changed the allocation of the dinner to the Parent Company, noting that her son and daughter were “employees of the firm.”²¹⁰ She claimed that when she prepared the tick sheet she did not know that the dinner was personal, and that she only realized that when she got further documentation. She did not say what that further documentation was.²¹¹

The Extended Hearing Panel finds that the post-Christmas dinner was improperly allocated to the Funds. The Extended Hearing Panel further finds that Springsteen-Abbott provided a false business justification to FINRA staff in a post-Complaint production. Springsteen-Abbott provided no reasonable explanation for why the expense was misallocated in the first place, and no reasonable explanation why she later provided a false business justification. The circumstances of this expense and the false business justification both added to the Extended Hearing Panel’s distrust of Springsteen-Abbott.

December 30, 2009. Springsteen-Abbott allocated to the Funds a charge of \$116.41 for a dinner with her husband at the Blue Pear Bistro on December 30, 2009. In connection with a post-Complaint production, she provided a tick sheet in her handwriting. The tick sheet claimed that the business purpose of the dinner was a “wholesaler performance review meeting.”²¹²

Springsteen-Abbott explained that she and her husband had met with their best wholesale distributor the night before for another dinner at a different restaurant. He was asking for more money. According to Springsteen-Abbott, the dinner at the Blue Pear Bistro with her husband was to discuss the wholesaler’s compensation.²¹³

Springsteen-Abbott admitted that at least her portion of the dinner was improperly allocated to the Funds. She called it an oversight. She testified that in August 2012 her portion of all the meal expenses that had been allocated to the Funds was “backed out” of the charges to

²⁰⁸ Hearing Tr. (Springsteen-Abbott) 653-60; CX-139.

²⁰⁹ Hearing Tr. (Springsteen-Abbott) 653-60. She testified that she reallocated the Broadway Joe’s charge to the Parent Company, in August 2012. *Id.* at 660.

²¹⁰ Hearing Tr. (Springsteen-Abbott) 657-58.

²¹¹ Hearing Tr. (Springsteen-Abbott) 659; CX-227.

²¹² Hearing Tr. (Springsteen-Abbott) 662-65; CX-141.

²¹³ Hearing Tr. (Springsteen-Abbott) 662-65.

the Funds. She denied that the adjustment had anything to do with FINRA's Wells notice in August 2012.²¹⁴

The Extended Hearing Panel finds that the entire meal charge was improperly allocated to the Funds. The circumstances support the conclusion that it was merely a holiday season dinner for husband and wife. There was no evidence to corroborate Springsteen-Abbott's assertion that it was a business dinner.

December 31, 2010. Email correspondence demonstrated that Springsteen-Abbott and her husband took a vacation the last week of December 2010, although Springsteen-Abbott resisted admitting that fact, and hastened to add that they had scheduled a business meeting while they were in New York.²¹⁵ She denied an employee's request to take a day off on December 28, 2010, because both she and her husband planned to be away from work that week and she wanted the employee to cover for them.²¹⁶ She told others at the firm that she and her husband would be seeing family and grandchildren from December 27 through 31, 2010.²¹⁷

An American Express dinner charge at a restaurant in New York City called Bistecca Fiorentina for \$247.78 was posted on December 31, 2010, on the American Express account. That charge was allocated to the Funds. Springsteen-Abbott provided a tick sheet with a business justification for the charge. The tick sheet claimed that the dinner was a meeting at Bice, a different restaurant, with "Bluerock to expand the GP capacity." The receipt attached to the tick sheet was for Bice, not Bistecca Fiorentina. It also was for a different amount for a meal that occurred a week later, on January 6, 2011. The Bice receipt was supplied to FINRA twice, once to support the December 2010 business expense and once again to support the January 6, 2011 business expense. However, the two receipts had different totals. The one submitted to support the December expense was not signed and had no preprinted total. It showed the total for the Bistecca Fiorentina dinner in handwriting. The one submitted to support the January expense had a preprinted charge for the meal and was signed by Hank Abbott. It included a tip. The total expense for the Bice dinner in January was \$176.92 before tip and \$214.92 with the tip.

Springsteen-Abbott eventually admitted that the receipt provided to support the Bistecca Fiorentina charge was inaccurate.²¹⁸

The Extended Hearing Panel finds that the December 2010 dinner charge was improperly allocated to the Funds. There is no reason to believe that it was anything other than an end-of-year holiday celebration. The Extended Hearing Panel further finds that Springsteen-Abbott provided a false and inaccurate business justification for the charge to FINRA staff.

²¹⁴ Hearing Tr. (Springsteen-Abbott) 665-66.

²¹⁵ Hearing Tr. (Springsteen-Abbott) 734-40, 753, 757-61; CX-233 through CX-235.

²¹⁶ Hearing Tr. (Springsteen-Abbott) 738-39; CX-233.

²¹⁷ Hearing Tr. (Springsteen-Abbott) 736-37; CX-234; CX-235.

²¹⁸ Hearing Tr. (Springsteen-Abbott) 743.

(13) Miscellaneous

Hank Abbott's car rentals. Hank Abbott kept no car at his primary residence in Florida. Instead, he frequently rented cars, picking them up and dropping them off at the Tampa airport. He testified that he had never rented a car in Florida that was not for business purposes. He often rented the cars for a period of two weeks or more. Enforcement collected 29 separate car rentals during the relevant period that cost a total of approximately \$23,900. All these charges were allocated to the Funds. Generally, the business justifications for these charges related to meetings that lasted a few days.²¹⁹

The Extended Hearing Panel finds that it is not credible that Hank Abbott rented cars frequently near his primary residence, where he had no car, solely for business purposes. Some substantial portion of the time that he rented those cars he was using them for personal purposes. It is impossible, however, to determine exactly which of the nearly \$24,000 in expenses, if any, might have been appropriate to allocate to the Funds.

The Extended Hearing Panel provides the following example, however, to illustrate the inadequate support for allocating Hank Abbott's car rental expenses to the Funds. Hank Abbott rented a car at the Tampa airport on October 9, 2009, for one week. Springsteen-Abbott allocated the rental car charge of \$566.97 to the Funds. She later provided a tick sheet with a business justification for the charge. The tick sheet said the car rental was for a person who was conducting on-going due diligence.²²⁰

Other evidence, including a hotel confirmation, showed that the person conducting the due diligence had been in Tampa only one night. Springsteen-Abbott also admitted that it was not customary for the Parent Company to rent a car for such a person. Rather, the Parent Company usually required people to rent their own cars and seek reimbursement.²²¹

Springsteen-Abbott had no explanation for how her husband came to rent a car for the week for someone who was in town only one night. She hypothesized that the wrong receipt had been linked to the charge, and she argued that the rental car charge might still be appropriate if her husband was preparing for the due diligence meeting.²²²

The Extended Hearing Panel finds that the car rental charge was improperly allocated to the Funds. The Extended Hearing Panel further finds that Springsteen-Abbott displayed little concern whether the charge was properly allocable to the Funds or not. She was focused only on showing that it might have been a legitimate business charge.

²¹⁹ Hearing Tr. (HAbbott) 990-98.

²²⁰ Hearing Tr. (Springsteen-Abbott) 666-67; CX-142.

²²¹ Hearing Tr. (Springsteen-Abbott) 667-68.

²²² Hearing Tr. (Springsteen-Abbott) 669-72.

Franceschina Charges For Dry Cleaning, Clothes, Accessories. Franceschina charged dry cleaning, new clothes, and accessories on the American Express card. Portions of some of these expenses were allocated to the Funds. During the course of the investigation and proceeding, some of these charges were reallocated to the Parent Company. Springsteen-Abbott provided business justifications for the original allocations and explanations for any reallocations.²²³

In her testimony, Franceschina admitted that some personal purchases had been treated as business expenses and allocated to the Funds, although she suggested it happened by mistake. She also directly contradicted some of the business justifications and explanations Springsteen-Abbott provided to FINRA staff. This testimony further undermines Springsteen-Abbott's credibility.

For example, Franceschina bought an accessory at the airport and a portion of the cost was allocated to the Funds. Springsteen-Abbott explained the business purpose, saying it was needed for a meeting because Franceschina had lost her luggage. The evidence showed, however, that the meeting was over, and Franceschina was at the airport to catch a plane elsewhere. Franceschina testified that the accessory was not for a meeting and that she had never indicated that it was.²²⁴

Similarly, four days after a trip that ended June 3, 2010, Franceschina bought something close to her home at Boscov's, and the cost was allocated to the Funds. Springsteen-Abbott provided a business justification, writing that Franceschina had lost her luggage. Franceschina testified that she thought the purchase was for something at the Pennsylvania office and that it had nothing to do with lost luggage. She emphasized that she had never indicated that the purchase was related to lost luggage.²²⁵

Franceschina testified that an Ann Taylor charge was related to the only time she ever lost her luggage. That Ann Taylor charge was initially allocated to the Funds.²²⁶

²²³ For example, Franceschina charged dry cleaning near her home on the company card after a trip to Florida. The Parent Company paid for the charge and then half of the expense was allocated to the Funds. Hearing Tr. (Franceschina) 516-18. Later Springsteen-Abbott reallocated the portion charged to the Funds back to the Parent Company. Hearing Tr. (Franceschina) 518-19.

²²⁴ Hearing Tr. (Franceschina) 519-23. The record contains other examples of accessory charges that were allocated to the Funds. Franceschina bought another accessory on her way out of town at another airport accessory shop. The cost was charged to the Funds. Springsteen-Abbott explained it as a business charge that did not require a receipt because it was below \$20. Hearing Tr. (Franceschina) 523-26.

²²⁵ Hearing Tr. (Franceschina) 526-29, 565-67.

²²⁶ Hearing Tr. (Franceschina) 529-31. Springsteen-Abbott provided a "lost luggage" business justification for a Dillard's charge by Franceschina. However, after they discussed the issue of lost luggage Springsteen-Abbott reallocated the expense to the Parent Company. Hearing Tr. (Franceschina) 533-34.

Franceschina testified that a handful of charges had been allocated to the Funds because she had used the company credit card by mistake. Springsteen-Abbott provided business justification documentation that indicated that these were mistakes that she had reallocated.²²⁷

Franceschina differed with Springsteen-Abbott's treatment of a Kohl's charge, however. Springsteen-Abbott claimed to FINRA staff that she had reallocated the Kohl's charge, providing the "wrong card again" explanation. Franceschina testified, however, that she had a personal Kohl's card that she would have used if the purchase was personal. She maintains that the Kohl's charge was a business purchase appropriate to allocate to the Funds.²²⁸

Purchase Of Novel: *Pursuit of Honor*. Hank Abbott and Springsteen-Abbott flew from Tampa, Florida, to Philadelphia on November 13, 2009. At the Tampa airport, Hank Abbott purchased a political thriller about counter-terrorism called *Pursuit of Honor* for \$27.97. That expense was allocated to the Funds.²²⁹

Initially, Hank Abbott testified that he would not himself have allocated the cost of the novel to the Funds, but he noted that wholesalers for the Commonwealth affiliates are permitted to charge one movie a day to alleviate the tedium of travel. Later, however, Hank Abbott was shown a business justification for the book expense written in Springsteen-Abbott's handwriting. It said "Quotes for presentation at Money Concepts." Then Hank Abbott claimed that he had bought the book to obtain quotes for a business conference.²³⁰ He explained that he frequently gave presentations at broker-dealer conferences to broker-dealers who sold their products, apparently not realizing that (as discussed below) broker-dealer business was not the Funds' business and could not be expensed to the Funds.²³¹

The Extended Hearing Panel finds that the cost of the book should not have been allocated to the Funds. The Extended Hearing Panel further finds that Hank Abbott's testimony lacked credibility. Finally, the Extended Hearing Panel finds that Springsteen-Abbott personally fabricated an absurd business justification that was untrue.

Conclusions regarding personal expenses. The Extended Hearing Panel could have been persuaded that a few meals and other expenses that appeared to be personal were actually related to the operation of the Funds or were simply inadvertent accounting errors. However, such a conclusion was impossible in the face of the large volume of improper charges and the circumstances in which Springsteen-Abbott and her husband incurred many of the expenses. The Extended Hearing Panel does not believe, for example, that business could have been the

²²⁷ The charges, which were reallocated because Franceschina had used the company card by mistake instead of her personal card, included \$128.99 at Bebe, in Newark, Delaware, and \$226.79 at Ann Taylor. Hearing Tr. (Franceschina) 542-51; CX-181; CX-182.

²²⁸ Hearing Tr. (Franceschina) 551-52, 567-69; CX-183.

²²⁹ Hearing Tr. (HAbbott) 984-89.

²³⁰ Hearing Tr. (HAbbott) 988-89.

²³¹ Hearing Tr. (HAbbott) 1019-20.

primary purpose of a meal when grandchildren were integral to the event. The Extended Hearing Panel also rejects the notion that a brief discussion of business at a meal in the context of a family celebration like the birthday cruise or the Mother's Day events makes it appropriate to allocate the expense of the meal to the Funds.

The nature of many of the expenses and the circumstances in which they occurred were evidence that they were improperly allocated to the Funds. For example, Springsteen-Abbott charged hundreds of dollars for merchandise from Bed Bath & Beyond during the relevant period. It is difficult to imagine how this related to the operation of the Funds' business, and there is no credible record evidence explaining any connection to the Funds' business. Similarly, she and her husband charged hundreds of dollars to the American Express card for dry cleaning, groceries, and unspecified pharmacy items. Again, it is difficult to imagine the connection to the Funds' business, and nothing in the record establishes such a connection.

The system by which Springsteen-Abbott, her husband, and Franceschina charged both personal and business expenses to the same American Express credit card was at the root of the problem. It permitted the improper allocations to be concealed, and Springsteen-Abbott gave no credible legitimate reason for operating in that fashion. In sum, the overall lack of transparency and accounting rigor undercut Springsteen-Abbott's claims regarding the business purposes for what appeared to be personal expenses.

H. Improperly Allocated Broker-Dealer Expenses

Springsteen-Abbott allocated to the Funds expenses associated with continuing education to maintain licenses relating to the Broker-Dealer. Many of these expenses were restaurant, fast food, and gas charges.²³² The food charges were often associated with continuing education seminars or studying for examinations. Typically, continuing education might consist of a day of training and then culminate in an awards dinner.²³³ There also were charges for on-line course work and for study materials.²³⁴ Springsteen-Abbott incurred some of the on-line Broker-Dealer training expenses on her own American Express card.²³⁵

Based on Springsteen-Abbott's own identification of expenses associated with continuing education to maintain the Broker-Dealer, Enforcement alleged a total amount of improper charges for Broker-Dealer expenses of \$24,478.97, plus an additional \$5,624.02 for an event at a restaurant called Alfano's for fifty-seven guests.²³⁶ Respondent's counsel objected that not all of the items on Enforcement's list were proven to be improper. There is no need, however, to

²³² Hearing Tr. (Edwards) 306-11; CX-6; CX-95.

²³³ Hearing Tr. (Edwards) 474-78.

²³⁴ Hearing Tr. (Edwards) 306-07; CX-95.

²³⁵ See the Expense Schedule attached to this decision. Item 329 indicates a charge on Springsteen-Abbott's American Express card for "FINRA Education & Training." She allocated that expense to the Funds.

²³⁶ Hearing Tr. (Edwards) 311, 315-17; CX-89; CX-95.

separately prove that every one of the fifty-seven items was improper. Broker-Dealer training is not the Funds' business, and under the Offering Documents the Funds agreed to pay only the expenses of conducting the Funds' business. Accordingly, the allocation of Broker-Dealer expenses to the Funds was inconsistent with the provisions of the Offering Documents relating to the allocation of expenses and was improper.

Moreover, as explained by a FINRA examiner, FINRA requires a written cost sharing agreement in order to shift Broker-Dealer expenses to a third party. FINRA Notice to Members 03-63 (issued in 2003) provides that if another entity is going to assume a broker-dealer expense there must be an expense sharing agreement between the entities and that agreement must be in writing. Here there was an expense sharing agreement between the Parent Company and the Broker-Dealer, but there was no expense sharing agreement between the Funds and the Broker-Dealer. Accordingly, the allocation of Broker-Dealer expenses to the Funds was inconsistent with long-standing FINRA guidance, and Springsteen-Abbott had reason to know that it was improper for her to allocate her Broker-Dealer expenses to the Funds.²³⁷

I. Improperly Allocated Expenses Of Control Persons

In the course of the investigation and proceeding, it became apparent that Springsteen-Abbott had improperly allocated to the Funds other expenses, that, even if related to the Funds' business, should never have been allocated to the Funds—the expenses of control persons. This similar misconduct—improperly allocating expenses to the Funds—is relevant for sanctions purposes. Accordingly, the Extended Hearing Panel's findings in this regard are discussed here.

Springsteen-Abbott was a control person throughout the entire three years at issue. Indeed, during much of that time, she considered herself the only control person. As she admitted, the Offering Documents for the Funds provided that no salary, benefits, or other expenses attributable to a control person were permitted to be charged to the Funds. For that reason, Springsteen-Abbott's salary and benefits were not allocated to the Funds.²³⁸ However, her portion of meals and other expenses were initially allocated to the Funds. After FINRA staff began the investigation and warned that it intended to commence a disciplinary proceeding, Springsteen-Abbott claimed to have reallocated the portion of such expenses attributable to her.²³⁹

The Extended Hearing Panel finds that Springsteen-Abbott's expenses were improperly allocated to the Funds. Any reallocation that may have occurred later does not alter the initial, improper nature of her conduct.

²³⁷ Hearing Tr. (Edwards) 306-13; CX-9; CX-95. FINRA Regulatory Notice 03-63 (Oct. 2003), <http://www.FINRA.org/industry/notices/03-63>.

²³⁸ Hearing Tr. (Franceschina) 1175-76; Hearing Tr. (Springsteen-Abbott) 1231.

²³⁹ Hearing Tr. (Springsteen-Abbott) 665-66, 779-81.

In her testimony, Franceschina volunteered that Hank Abbott became a control person sometime in 2010. According to her testimony, when that happened, they stopped allocating his salary and benefits to the Funds.²⁴⁰ However, Springsteen-Abbott continued to allocate to the Funds Hank Abbott's expenses for meals, gas, car rentals, and other purchases, just as she did before. There was no testimony suggesting that Springsteen-Abbott reversed or reallocated his portion of those expenses after he became a control person. The Schedule attached to the Amended Complaint alleges that in 2011 Springsteen-Abbott allocated several hundred charges by Hank Abbott to the Funds and that those charges were not related to the Funds' business. These charges include pharmacy and grocery charges, numerous fast food and restaurant charges, and gasoline charges. Because Hank Abbott was a control person in 2011, even if the charges had been legitimate expenses relating to the Funds' business (which is doubtful in many instances and clearly untrue in others), his charges should not have been allocated to the Funds.²⁴¹

Certainly by the time that Springsteen-Abbott finally realized that, as a control person, her expenses were not allocable to the Funds, she should also have realized that her husband's expenses were not allocable to the Funds once he became a control person. But she did not. There is no indication in the record that she made any attempt to reallocate his expenses after he became a control person.

Springsteen-Abbott took the position that she did not have to reallocate her husband's expenses. She testified that, although they were moving him in that direction, Hank Abbott was not yet a full-fledged control person until 2012.²⁴²

The Extended Hearing Panel finds that Franceschina's unprompted description of Hank Abbott as becoming a control person in 2010 is more trustworthy than Springsteen-Abbott's calculated and self-interested characterization of his role. Furthermore, Franceschina testified that they stopped charging the Funds for Hank Abbott's salary and expenses at some point in 2010, which is indicative of when he became a control person.

For purposes of sanctions generally, and for purposes of disgorgement in particular, the Extended Hearing Panel finds that all of Hank Abbott's expenses in 2011, as listed on the Schedule attached to the Complaint, were improperly allocated to the Funds. It further finds that Springsteen-Abbott allocated those expenses to the Funds with knowledge that it was improper to do so.

²⁴⁰ Hearing Tr. (Franceschina) 1175-76.

²⁴¹ The attached Expense Schedule lists charges by Hank Abbott in 2011 for fast food, gas, home improvement purchases, groceries, pharmacy items, ice cream, and restaurants.

²⁴² Hearing Tr. (Springsteen-Abbott) 1231-38.

J. Credibility Determinations

As is abundantly clear from the findings detailed above, the Extended Hearing Panel does not find either Springsteen-Abbott or her husband, Hank Abbott, credible. Their testimony was rife with inconsistencies and often defied commonsense. Furthermore, the Extended Hearing Panel found numerous instances in which Springsteen-Abbott provided false and misleading business explanations for expenses that she initially allocated to the Funds. Finally, the circumstances of the Borham attestation show that Springsteen-Abbott purposely arranged for the presentation of false and misleading evidence at the hearing.

Testimony Lacking Credibility. Some glaring examples of Springsteen-Abbott's and Hank Abbott's more incredible testimony include the following:

Springsteen-Abbott testified that the birthday celebration cruise to Alaska in 2009 was partially a business trip that justified allocating to the Funds expenses for food, an airline ticket, and a rental car. The circumstances, however, show that her best friend's husband organized the trip for his wife and invited Springsteen-Abbott and her husband to come along. It was a vacation, and there is no evidence of any business purpose or activity.

Springsteen-Abbott repeatedly testified about meals at Cody's Roadhouse, asserting that she had properly allocated those expenses to the Funds, when the evidence showed they were meals with her children and grandchildren or one of her best friends. Springsteen-Abbott denied that her grandchildren were at many of these meals, although the meals included items from the children's menu. She claimed, incredibly, that some of the children's meals, including "kid's mac & cheese," were part of her Jenny Craig diet.

Springsteen-Abbott testified that the 2010 Mother's Day meal at Longwood Gardens was appropriate to charge to the Funds, even though the evidence was that her husband had organized a family party for her with her adult children and grandchildren. The next year, in 2011, Springsteen-Abbott allocated to the Funds another Mother's Day meal. She provided a vague business justification—that they discussed the "FINRA situation and plan[ned] document project"—which had to be untrue because the meal was four months before the FINRA examination.

Springsteen-Abbott specifically denied that it was improper for her to allocate to the Funds a Home Depot charge for a grazing doe to decorate her lawn at holiday time. She offered a vague and unsubstantiated justification that she had entertained "management" at her home. Even if true, that business connection did not establish that the doe was purchased for the Funds' business.

Hank Abbott's testimony regarding several visits to New Jersey to obtain hair restoration services and visit family similarly lacked credibility. One trip in particular stands out. On that trip he flew from his home in Florida to Newark in the late afternoon, stayed overnight, went to the hair restoration company in Paramus, New Jersey, and was back at the Newark airport by 2

p.m. to fly back to Florida. Among other items, the cost of the New Jersey rental car was allocated to the Funds. Hank Abbott maintained that the New Jersey rental car was an appropriate business expense and denied that the trip was for his personal purpose of obtaining hair restoration services. However, he never identified any business purpose or activity on this trip.

Hank Abbott's testimony relating to the TGI Fridays expense the weekend he and Springsteen-Abbott flew to Texas for a child's baptism was not believable. The charge was incurred close to midnight after a 5 p.m. mass and family celebration. The Extended Hearing Panel does not believe that they conducted a business interview of a family member in a restaurant close to midnight after the family celebration.

Hank Abbott's testimony regarding the purchase of the political thriller, *Pursuit of Honor*, was transparently false. He modified his testimony after being shown the tick sheet explanation his wife created so as to be consistent with the tick sheet.

False and misleading business justifications. Springsteen-Abbott repeatedly provided FINRA staff with business justifications for her allocation of expenses that were contradicted by other evidence. Sometimes the circumstances compelled the conclusion that Springsteen-Abbott had purposely misrepresented the true nature of expenses.

As discussed above, Springsteen-Abbott provided false documentation for a fast food charge in connection with the birthday cruise trip. She also gave false business purposes for dinners at Cody's Roadhouse that were revealed at the hearing to be family dinners with grandchildren and others. She explained the Best Buy purchase of the Motorola Bluetooth speaker and in-vehicle satellite radio as a recruiting enticement for a person who had been unemployed for over four years. She attributed a December 27, 2009, dinner in New York City for over \$800 to a meeting with leasing vendors, when the dinner was for her family who were spending a holiday weekend at a hotel in Times Square. Her employee, Franceschina, contradicted her explanations with respect to a number of smaller charges by Franceschina that were allocated to the Funds. Finally, Springsteen-Abbott personally provided a totally unbelievable explanation for charging the political thriller, *Pursuit of Honor*, to the Funds—that her husband was looking for quotes for a speech.

Borham attestation. The circumstances of the Borham attestation also were troubling. The attestation was designed to show that a business justification for a meal in New Jersey on a trip to visit family and friends had been mistaken in a detail but was still a valid business justification. Springsteen-Abbott provided a business justification that the meal was a dinner for her husband and two other people after an Allied Health visit. When she learned that one of the three people had told FINRA staff that he was not at the meal, she called her son and provided him an attestation to sign saying he had been on the business trip and at the meal. There were reasons to doubt that he signed the attestation. Moreover, even if he did, the attestation sets forth details regarding the purported business trip and meal that are inconsistent with the proven facts.

These events show that Springsteen-Abbott would do or say anything to avoid admitting that she improperly allocated personal expenses to the Funds.

K. Respondent Agreed She Has Duties To The Funds

As discussed below, Springsteen-Abbott argues that Enforcement has shown, at most, a breach of contract and not an ethical violation. Relevant to that argument is that Springsteen-Abbott violated well-understood duties that she owed to the Funds. Even she agreed that in light of her position as the top executive of all the relevant entities, she owed investors in the Funds a duty to act honestly in allocating expenses, a duty to act ethically, and a duty to act in good faith.²⁴³ The Extended Hearing Panel finds that she breached all of these duties.

L. Findings Related To The Amount Of Improperly Allocated Expenses

As discussed below, the Extended Hearing Panel has determined that Springsteen-Abbott violated FINRA Rule 2010. As further discussed below, among other sanctions, the Extended Hearing Panel orders Springsteen-Abbott to pay disgorgement. The Extended Hearing Panel makes the following findings relating to the amount of disgorgement.

The Amended Complaint alleged that Springsteen-Abbott improperly charged 1840 expenses to the Funds. Although Enforcement did not individually prove at the hearing that every single one of those expenses was improperly allocated to the Funds, it did prove that Springsteen-Abbott engaged in a purposeful pattern and practice of improperly allocating expenses to the Funds. Enforcement also demonstrated that the nature and circumstances of many of the expenses compelled the conclusion that they were personal expenses, Broker-Dealer expenses, and control person expenses that should not have been allocated to the Funds. Assertions by Springsteen-Abbott and her husband regarding the purported business purposes for various charges were proven untrustworthy.

Respondent argues that no sanction should be imposed on the basis of any expense that was not individually addressed in testimony at the hearing. In post-hearing briefing she asserted that there was no evidence that any of more than 1700 items on Schedule 1 were improperly allocated.²⁴⁴

Given the proven pattern and practice and the surrounding circumstances, Springsteen-Abbott misstates the record. The Extended Hearing Panel also notes that Respondent herself is responsible for uncertainty about the validity of the individual charges not discussed at the hearing. Although Respondent admitted that some of the alleged improper charges were in fact erroneously charged to the Funds, Respondent refused to identify the particular expenses that were the subject of her admission.

²⁴³ Hearing Tr. (Springsteen-Abbott) 618-19.

²⁴⁴ Resp. PH Brief at 1.

The Extended Hearing Panel finds that it is fair and reasonable to view all of the alleged improper charges as unjust enrichment. The Extended Hearing Panel further finds that there is reason to distrust the explanations Springsteen-Abbott provided FINRA staff to justify dropping some 400 items from the original Complaint. The Extended Hearing Panel bases its findings on the improper expense allocations individually proven, the categories of improper charges that also were proven, the pattern of misuse, and other circumstances indicating Springsteen-Abbott's lack of candor and fundamental failure to comply with her ethical obligations.

The Expense Schedule attached to this decision contains Enforcement's itemization of the total amount of costs that Springsteen-Abbott initially shifted from herself to the Funds. After adjustments dropping the 400 additional items from the original Complaint, Enforcement calculated the total for the remaining 1840 items to be \$208,953.75. The Extended Hearing Panel finds that this is a fair and reasonable estimate of the amount by which Springsteen-Abbott was unjustly enriched.

IV. CONCLUSIONS OF LAW

A. Respondent Violated FINRA Rule 2010

(1) Rule 2010 Broadly Prohibits Unethical Conduct

FINRA Rule 2010 requires FINRA members and their associated persons to "observe high standards of commercial honor and just and equitable principles of trade" in the conduct of their business.²⁴⁵ This Rule requires members of the securities industry not merely to conform to legal and regulatory requirements but to conduct themselves with integrity, fairness, and honesty.²⁴⁶

FINRA Rule 2010 is a broad prohibition against unethical conduct. In *Heath v. SEC*,²⁴⁷ the Second Circuit Court of Appeals explained that FINRA Rule 2010 "is concerned with enforcing ethical standards of practice in the securities industry."²⁴⁸ The Court extensively discussed the purpose of the Rule and the role it plays in filling in potential gaps in the law and regulations that prohibit specific misconduct. The Court said that prohibitions against specific

²⁴⁵ FINRA Rule 2010 is used here to refer not only to the current Rule regarding ethical conduct, but also to its predecessor rules at NASD and NYSE Regulation. The Securities and Exchange Commission ("SEC") applies the same analysis and precedents whichever particular rule is discussed. *Blair Alexander West*, Exchange Act Release No. 74030, 2015 SEC LEXIS 102, at *20 n.13 (Jan. 9, 2015).

²⁴⁶ *Robert Marcus Lane*, Exchange Act Release No. 74269, Slip Op. 10 n.20 (Feb. 13, 2015) ([T]his general ethical standard . . . is broader and provides more flexibility than prescriptive regulations and legal requirements. [FINRA Rule 2010] protects investors and the securities industry from dishonest practices that are unfair to investors or hinder the functioning of a free and open market, even though those practices may not be illegal or violate a specific rule or regulation. [FINRA Rule 2010] has proven effective through nearly 70 years of regulatory experience.").

²⁴⁷ *Heath*, 586 F.3d 122 (2d Cir. 2009), *aff'g*, *Thomas W. Heath, III*, Exchange Act Release No. 59223, 2009 SEC LEXIS 14 (Jan. 9, 2009).

²⁴⁸ *Id.* at 131.

kinds of fraudulent practices “must be supplemented by regulation on an ethical plane in order ‘to protect the investor and the honest dealer alike from dishonest and unfair practices by the submarginal element in the industry’ and ‘to cope with those methods of doing business which, while technically outside the area of definite illegality, are nevertheless unfair both to customer and to decent competitor, and are seriously damaging to the mechanism of the free and open market.’”²⁴⁹ In its 2009 decision in *Heath*, the Second Circuit quoted Judge Friendly in a 1966 Second Circuit decision, who described the predecessor of Rule 2010 as “something of a catch-all” that “preserves power to discipline members for a wide variety of misconduct, including merely unethical behavior.”²⁵⁰

Scienter is not required for a Rule 2010 violation. Rather, the SEC has established a disjunctive test for a Rule 2010 violation that applies *either* to intentional or conscious bad conduct *or* to a failure to meet ethical norms, regardless of intention. The SEC has held that Rule 2010 may be violated if the respondent has acted *either* in bad faith *or* unethically.²⁵¹ The SEC recently confirmed that it has “long applied a disjunctive ‘bad faith or unethical conduct’ standard to disciplinary action under [Rule 2010].”²⁵² In the context of a Rule 2010 violation, the SEC has defined bad faith as a dishonest belief or purpose, and unethical conduct as conduct inconsistent with the moral norms or standards of professional conduct.²⁵³

Misconduct does not have to involve a security to constitute a violation of Rule 2010. The Rule encompasses any unethical business-related misconduct.²⁵⁴ As the NAC recently noted, the argument that business activities are beyond the scope of FINRA’s disciplinary

²⁴⁹ *Id.* at 132.

²⁵⁰ *Id.* at 134 (quoting *Colonial Realty Corp. v. Bache & Co.*, 358 F.2d 178, 182 (2d Cir.), *cert. denied*, 385 U.S. 817 (1966)).

²⁵¹ *Id.* at 133.

²⁵² *West*, 2015 SEC LEXIS 102, at *20.

²⁵³ *Edward S. Brokaw*, Exchange Act Release No. 70883, 2013 SEC LEXIS 3583, at *33 (Nov. 15, 2013). *See also Simpson v. Bear, Stearns & Co.*, No. C07950030, 1997 NASD Discip. LEXIS 13, at *27 n.9 (NAC Jan. 29, 1997) (“Term ‘bad faith’ is not simply bad judgment or negligence, but rather it implies the conscious doing of a wrong because of dishonest purpose or moral obliquity....”).

²⁵⁴ *Dep’t of Enforcement v. Gallagher*, No. 2008011701203, 2011 FINRA Discip. LEXIS 40, at *17-18 and n.46 (OHO June 13, 2011) (“Rule 2110 is an ethical rule ... FINRA’s authority to pursue disciplinary action for violations of Rule 2110 is sufficiently broad to encompass any unethical business-related misconduct, regardless of whether it involves a security.”), *aff’d*, 2012 FINRA Discip. LEXIS 61 (NAC Dec. 12, 2012) (respondent barred for acting as unregistered principal); *Dep’t of Enforcement v. Mullins*, Nos. 20070094345, 20070111775, 2011 FINRA Discip. LEXIS 61, at *22 (NAC Feb. 24, 2011) (“FINRA’s disciplinary authority under NASD Rule 2110 is also broad enough to encompass business-related conduct that is inconsistent with just and equitable principles of trade, even if that activity does not involve a security.”) (internal citations and quotations omitted), *aff’d in part*, *John Edward Mullins*, Exchange Act Release No. 66373, 2012 SEC LEXIS 464 (Feb. 10, 2012); *Dep’t of Enforcement v. DiFrancesco*, No. 2007009848801, 2010 FINRA Discip. LEXIS 37, at *16 n.11 (NAC Dec. 17, 2010) (citing cases) (“There is a long line of cases stating that a member can be disciplined for “business-related conduct” that violates NASD Rule 2110, even when the activity does not involve a security.”), *aff’d*, Exchange Act Release No. 66113, 2012 SEC LEXIS 54 (Jan. 6, 2012); *Dep’t of Enforcement v. Shvarts*, No. CAF980029, 2000 NASD Discip. LEXIS 6, at *12 (NAC June 2, 2000) (citing *Daniel Joseph Alderman*, 52 S.E.C. 366, 369 (1995), *aff’d*, 104 F.3d 285 (9th Cir. 1997)).

authority if they are not directly related to the securities industry “has been repeatedly rejected in a long line of case decisions.”²⁵⁵

Because the securities industry is built on trust, any ethical failure damages the industry generally by casting doubt on the integrity of its participants. An ethical failure also casts doubt on the ability of the particular miscreant to conform to ethical norms in the future. Enforcement of FINRA Rule 2010 is therefore fundamental to FINRA’s regulatory mission, which, as expressed in the Sanction Guidelines, “is the building of public confidence in the financial markets.”²⁵⁶ The overall purposes of FINRA’s disciplinary process are “to remediate misconduct by preventing the recurrence of misconduct, improving overall standards in the industry, and protecting the investing public.”²⁵⁷ These purposes are served not just when discipline is imposed for conduct undertaken in bad faith, but also when it is imposed for conduct that is unethical.

(2) Respondent’s Assertion That Enforcement Must Prove Bad Faith Is Rejected

Springsteen-Abbott makes a legal argument that betrays a profound failure to understand the nature of her ethical responsibilities. She contends that Enforcement must prove that she allocated the expenses in bad faith—that she intentionally engaged in wrongdoing. The Extended Hearing Panel rejects the argument because it lacks support and is contrary to FINRA Rule 2010. The Rule is intended to encompass a broad range of unethical conduct, not merely intentional wrongdoing.²⁵⁸

Springsteen-Abbott argues that she was not acting on behalf of a regulated entity when she allocated expenses to the Funds (because she was acting on behalf of the General Partner of the Funds), and that the rights of the Funds and the General Partner are defined solely by contract, not FINRA Rules. She asserts, as a consequence, that she cannot be found to have violated any FINRA conduct rule, the alleged Rule 2010 violation involves activity not regulated by FINRA, and FINRA cannot assert a violation of a FINRA Rule as the underlying basis for a Rule 2010 violation. She further asserts that a mere breach of contract does not violate Rule 2010. She asserts that Enforcement must prove that she allocated the charges in bad faith,

²⁵⁵ *Dep’t of Enforcement v. Wiley*, No. 2011028061001, Slip Op. at 8 (NAC Feb. 27, 2015) (collecting additional cases).

²⁵⁶ FINRA Sanction Guidelines (Guidelines) at 1 (2013) (Overview), www.FINRA.org/Sanctionguidelines.

²⁵⁷ Guidelines at 2 (General Principles Applicable To All Sanction Determinations).

²⁵⁸ *West*, 2015 SEC LEXIS 102, at *20-21 (Jan. 9, 2015).

relying primarily on a 1977 Second Circuit decision, *Buchman v. SEC*, which contains language stating that a breach of contract is unethical only if it is in bad faith.²⁵⁹

Springsteen-Abbott's argument fails for three reasons.

First, the argument would write out of Rule 2010 the *ethical* prong of the disjunctive standard, and would make Rule 2010 apply only where there has been a violation of another FINRA Rule or conscious wrongdoing amounting to bad faith. That position is inconsistent with long-standing precedent, including the Second Circuit's decision in *Heath* discussed above, where the Court of Appeals described the Rule as a "broad ethical principle."²⁶⁰ The Court of Appeals discussed the precedents interpreting Rule 2010 at length, concluding that a violation of the Rule does not require bad faith or scienter. Rather, Rule 2010 concerns business ethics.²⁶¹

Second, the argument rests on the wholly unsupported proposition that bad faith is required where no violation of another FINRA Rule is alleged. Springsteen-Abbott cites no authority for that proposition.

Third, the argument is based on language that Springsteen-Abbott extracted from two decisions (*Buchman* and the SEC decision in *Heath*) without regard for context or nuance. Springsteen-Abbott also ignores completely the Second Circuit's decision in *Heath* that reviewed the SEC decision in *Heath* that she relies upon.²⁶² When the cases Respondent cites are read carefully, and when the Second Circuit's later extensive analysis of those cases and others is considered, it is apparent that Springsteen-Abbott's assertion that Enforcement must show bad faith is wrong.

Springsteen-Abbott quotes language from *Buchman* declaring that a breach of contract is unethical only if it is in bad faith, and comparing the bad faith requirement to scienter in a fraud case.²⁶³ She also quotes language from the SEC decision in *Heath* about *Buchman*. The SEC said in *Heath* that the *Buchman* decision "was consistent with long-standing Commission precedent holding that a breach of contract alone is not automatically unethical conduct in

²⁵⁹ *Buchman v. SEC*, 553 F.2d 816, 821 (2d Cir. 1977).

Springsteen-Abbott misstates Enforcement's argument when she asserts that Enforcement attacks any misallocation of expenses, even if it is accidental. Resp. PH Brief. at 8. Enforcement did not allege that Springsteen-Abbott accidentally or inadvertently misallocated some expenses; rather, it alleged and proved that she engaged in a pattern and practice of misallocating expenses to the Funds that was unethical.

²⁶⁰ *Heath*, 586 F.3d at 132.

²⁶¹ *Id.* at 137.

²⁶² *Id.* at 132-39.

²⁶³ Resp. PH Brief. at 9.

violation of the rule, but that such breach may constitute a violation if it was ‘unethical or dishonorable’ or ‘without equitable excuse or justification.’²⁶⁴

It is apparent from these extracts that a breach of contract is not automatically unethical conduct and that other facts and circumstances must be examined to determine if the breach was unethical. However, even the quoted language fails to support the proposition that bad faith is required. The quoted language does not mention good faith, scienter, state of mind, or intention. Rather, the language indicates that a breach of contract may be a violation because it is unethical, dishonorable, or lacking an equitable excuse or justification. That language indicates a broader range of potentially violative conduct and indicates that such conduct may be judged objectively, regardless of a respondent’s intent.

In fact, as made plain in the Second Circuit’s analysis of *Buchman in Heath*, *Buchman* was a highly unusual case with no application here. *Buchman* was a broker-dealer that refused to honor a contractual duty to accept shares of a company from another broker. The SEC had suspended trading in that company’s stock because of suspicion of fraud and had warned brokers against accepting delivery unless they had no reason to believe that the counterparty was connected to the fraud. *Buchman* thus was subject to conflicting duties—on the one hand, to fulfill the contract, and, on the other hand, to comply with regulatory directives arising out of concern that a manipulative scheme was ongoing. Furthermore, as noted by the Second Circuit, the alleged misconduct involved a single transaction and did not even purport to show a course of unethical business practice.²⁶⁵ Accordingly, the Second Circuit reversed the SEC’s determination that *Buchman* had violated Rule 2010 by failing to accept delivery of the shares, and concluded that *Buchman* had not behaved unethically.

In contrast here, *Springsteen-Abbott*’s misconduct did not arise because of conflicting duties and a desire not to facilitate a fraud. Rather, she freely chose to conduct her business affairs in the way she did. She had many other options. Nor are we concerned here with a single transaction. Rather, *Springsteen-Abbott* pursued a business practice that she repeated over and over, month after month, for a period of at least three years. That business practice was to her personal benefit and the Funds’ detriment, and it was concealed from the Funds.

Springsteen-Abbott cites language from another case, *Dep’t of Enforcement v. Shvartz*,²⁶⁶ that is far more consistent with the broad-ranging inquiry appropriate to evaluating the ethical nature of conduct alleged to violate FINRA Rule 2010: “The analysis that is employed is a flexible evaluation of the surrounding facts with attention to the ethical nature of the conduct.”²⁶⁷

²⁶⁴ Resp. PH Brief at 10.

²⁶⁵ *Heath*, 586 F.2d at 136-37.

²⁶⁶ *Dep’t of Enforcement v. Shvartz*, 2000 NASD Discip. LEXIS 6, at *5 OHO June 2, 2000).

²⁶⁷ *Id.* (quoted in Resp. PH Brief. at 10).

It is the ethical nature of the conduct that must be evaluated, not simply the actor's state of mind. Such an evaluation will, of course, include consideration of the actor's state of mind, but it also will include all the facts and circumstances and whether the actor departed from the moral and professional norms expected in the securities industry. The *Shvartz* decision made that clear in language also quoted by Springsteen-Abbott:

Failure to honor obligations in private contracts are viewed as violations of [FINRA Rule 2010] only if the surrounding facts and circumstances indicate that the conduct was unethical. The concepts of excuse, justification, and 'bad faith' *may be employed* to determine whether conduct is unethical in these cases.²⁶⁸

Recently, the SEC reiterated that a violation of Rule 2010 (in its predecessor form as NASD Conduct Rule 2110) does not require a finding of bad faith. It said, Rule 2010 "focuses on the conduct itself instead of the securities professional's intent or state of mind."²⁶⁹

(3) Respondent's Conduct Violated FINRA Rule 2010 Under Either Prong Of The Test

In any event, Springsteen-Abbott's conduct violated FINRA Rule 2010 under either prong of the test. Her conduct was clearly unethical because it was inconsistent with the moral norms and standards of professional conduct. However, the evidence also supports the conclusion that she acted in bad faith.

a. Springsteen-Abbott's Conduct Was Unethical

Springsteen-Abbott regularly allocated personal expenses to the Funds over an extended period of time. She also allocated Broker-Dealer expenses to the Funds. The Offering Documents for the Funds, however, plainly stated the Funds would only pay the expenses of conducting and administering the Funds' business. Accordingly, Springsteen-Abbott used the Funds' monies in ways that were not authorized.

It is fundamental that the use of investor money for purposes different than the investor intended is unethical. The SEC recently reiterated that principle, saying, "[M]isuse of customer funds is 'patently antithetical to the high standards of commercial honor and just and equitable

²⁶⁸ *Id.* (emphasis supplied) (quoted in Resp. PH Brief at 10).

²⁶⁹ *Steven Robert Tomlinson*, Exchange Act Release No. 73825, 2014 SEC LEXIS 4908, at *17 (Dec. 11, 2014) (quotations and citations omitted). *See also Keith Springer*, Exchange Act Release No. 45439, 2002 SEC LEXIS 3417 (Feb. 13, 2002) (finding that improper post-execution allocation of trades violated Rule 2010 regardless of intent or motive).

principles of trade' that [FINRA] seeks to promote.”²⁷⁰ No further inquiry into her state of mind is necessary.

b. Springsteen-Abbott Acted In Bad Faith

In any event, the facts and circumstances of this case well support the conclusion that Springsteen-Abbott acted in bad faith.²⁷¹ She knowingly (or at least recklessly) engaged in improper conduct, allocating personal expenses and Broker-Dealer expenses to the Funds when the Funds had agreed only to pay expenses of the Funds' business. She engaged in the improper allocations over a period of years, and on a regular basis, repeatedly every month. The conduct was to her personal benefit and to the detriment of the Funds. She was in a position of sole control as to the process for reviewing and allocating expenses, and she chose to mingle personal and business expenses in a manner that made mistakes likely and auditing difficult. When the FINRA investigation started and the initial Complaint was filed, she submitted to FINRA tick sheets with false business justifications to conceal the improper nature of many of the expense allocations.²⁷² She violated duties that she acknowledged she owed the Funds—her duties to act honestly, ethically, and in good faith when allocating expenses to the Funds.²⁷³

(4) The Extended Hearing Panel Rejects Respondent's Argument That No Harm Was Done

Springsteen-Abbott asserted at the hearing that investors in the Funds were not harmed by the allocation of expenses to them, because she voluntarily benefited them in other ways. In her post-hearing brief, she calculated that her voluntary contributions amounted to far more than the alleged improper expense allocations. According to her calculation she provided close to

²⁷⁰ *West*, 2015 SEC LEXIS 102, at *21 (quoting *Henry E. Vail*, Exchange Act Release. No. 35872, at *8 n.12 (June 20, 1995)).

²⁷¹ It is well-established that “[i]ntent may be proved through circumstantial evidence and inferences drawn from surrounding circumstances.” *West*, 2015 SEC LEXIS 102, at *24 n.20 (quoting *Thomas C. Kocherhans*, Exchange Act Release No. 36556, 1995 SEC LEXIS 3308, at *7 (Dec. 6, 1995)).

²⁷² Acts to conceal misconduct can demonstrate that a respondent knew his conduct was wrongful. *West*, 2015 SEC LEXIS 102, at *23 and n.21 (collecting cases).

²⁷³ *Tomlinson*, 2014 SEC LEXIS 4908, at *20 (“In determining whether a securities professional’s conduct is inconsistent with just and equitable principles of trade, we look to whether the conduct implicates a generally recognized duty owed to either customers or the firm.”).

\$2.4 million in voluntary financial support to the Funds.²⁷⁴ She calls herself a proactive general partner.²⁷⁵

The so-called “off-set” is irrelevant. Even assuming, *arguendo*, that Springsteen-Abbott made such voluntary contributions to the Funds, it would not make her improper allocations of personal expenses to the Funds proper. The Funds were entitled not to be charged for personal expenses like her dinners with friends and family, regardless of whether she voluntarily provided the Funds with other monetary benefits. She was not free to ignore the agreements governing the allocation of expenses to the Funds if she compensated the Funds in some other way according to her own views and needs. A so-called “off-set” granted at her whim does not excuse her misuse of the Fund’s money for personal purposes.

V. SANCTIONS

A. Applicable Sanction Guidelines And Considerations

In considering the appropriate sanction for a violation, adjudicators in FINRA disciplinary proceedings look to FINRA’s Sanction Guidelines. The Sanction Guidelines contain recommendations for sanctions for many specific violations, depending on the circumstances. They also contain General Principles and overarching Principal Considerations, which are applicable in all cases. The Sanction Guidelines are intended to be applied with attention to the regulatory mission of FINRA—to protect investors and strengthen market integrity.²⁷⁶

Springsteen-Abbott is charged here with violating FINRA Rule 2010 by misusing customer funds. The Sanction Guidelines have specific recommendations for that type of violation. The Sanction Guidelines recommend a fine of \$2,500 to \$50,000 and permit an adjudicator to consider a bar from the industry. Where the misuse results from a respondent’s misunderstanding, rather than intentional misuse, or where there is other mitigation, adjudicators may consider a suspension in any or all capacities for six months to two years—and that

²⁷⁴ Resp. PH Brief at 6-8. Springsteen-Abbott claimed three types of “off-set.” First, she claimed that there was a “built-in cushion,” asserting that the Parent Company voluntarily paid for 10% of all American Express charges and operating expenses as though it were another Fund. Second, she claimed that she had voluntarily made capital contributions to two of the Funds, and waived fees and expenses for five of the Funds. Third, she claimed that the Parent Company built its own tech center to support the leasing business but did not pass along certain of the expenses for it, to the benefit of eight of the Funds. *Id.*

The Extended Hearing Panel does not believe that Springsteen-Abbott gave the Funds \$2.4 million voluntarily and without any obligation or personal benefit to her. Given the Extended Hearing Panel’s view of the Respondent’s credibility, the Panel also would not accept such an assertion without considerable corroboration not found in the record here.

²⁷⁵ Hearing Tr. (Springsteen-Abbott) 829-30, 842-43, 851-52, 854-59, 1183; Hearing Tr. (Franceschina) 1295-97; Resp. PH Brief at 7.

²⁷⁶ See Guidelines at 1 (Overview).

suspension may continue thereafter until the respondent pays restitution.²⁷⁷ The Principal Considerations should be consulted as relevant.²⁷⁸

The Sanction Guidelines are just that, guidelines. They are not absolute. As set forth in the Overview of the Sanction Guidelines, adjudicators may impose sanctions that fall outside the recommended ranges based on the facts and circumstances of each case.²⁷⁹

The Extended Hearing Panel has consulted the applicable recommendations, relevant Principal Considerations, General Principles, and Overview. It also has closely considered the particulars of this case.

Although the sanctions imposed here vary in some respects from the recommendations, the Extended Hearing Panel believes that more stringent sanctions serve FINRA's regulatory mission and protect the investing public. The Sanction Guidelines caution that sanctions must be significant enough to prevent and discourage future misconduct by a respondent and to deter others from similar misconduct. Sanctions also should encourage improved business practices.²⁸⁰ The Sanction Guidelines expressly permit adjudicators to craft sanctions designed to prevent the recurrence of misconduct, even if those sanctions differ from the Sanction Guidelines.²⁸¹

B. Aggravating Factors

The number and quality of aggravating factors contribute to the conclusion of the Extended Hearing Panel that Springsteen-Abbott's misconduct warrants stringent sanctions.

(1) Springsteen-Abbott Did Not Acknowledge Her Responsibility For The Misconduct Before Detection, Or, In Many Instances, Even After

Principal Consideration 2 recommends that adjudicators should consider whether a respondent acknowledges and accepts responsibility for misconduct before detection by a regulator.²⁸²

In this case, it was only after regulatory scrutiny was brought to bear on her allocation practices that Springsteen-Abbott conceded that she had improperly allocated some expenses to the Funds. As to the majority of the more than 1800 alleged improperly allocated expense items, she continued to maintain that she had properly allocated them to the Funds. Even when she reallocated some expenses, she denied that they had been improperly allocated in the first place.

²⁷⁷ Guidelines at 36.

²⁷⁸ *Id.* at 2.

²⁷⁹ Guidelines at 1 (Overview).

²⁸⁰ Guidelines at 2 (General Principle No.1).

²⁸¹ Guidelines at 3 (General Principle No. 3).

²⁸² Guidelines at 6 (Principal Consideration No. 2).

She made it clear that she viewed the reallocations as simply a tactic she hoped would diminish or end further regulatory interest. As to many of the specific expenses that were the subject of hearing testimony, she persisted in describing many charges as business expenses even where the circumstances strongly indicated otherwise. Even when she was forced to admit that a meal or other charge was actually a personal expense, she displayed no remorse for her prior improper allocation of the expense to the Funds.

Furthermore, Springsteen-Abbott argued that Enforcement had failed to prove that she specifically approved or instructed the allocation of any particular expense to the Funds. She noted that although she reviewed the monthly American Express statements, she only signed a voucher that aggregated the American Express charges by category. By this argument, Springsteen-Abbott attempts to shift responsibility elsewhere, which is an aggravating factor.

Springsteen-Abbott cannot deny that she, and only she, had authority to allocate expenses to the Funds. To the extent that her system of authorization did not provide her with specific information about the charges at the time that she signed her approval, she, and only she, was responsible for the system and for any defects in it.²⁸³

(2) Springsteen-Abbott Engaged In A Pattern Of Misconduct Over An Extended Period Of Time

Principal Consideration 8 suggests that adjudicators consider whether a respondent has engaged in numerous acts and/or a pattern of misconduct. Principal Consideration 9 focuses on whether a respondent has engaged in the misconduct over an extended period of time.²⁸⁴

It is an aggravating factor that Springsteen-Abbott engaged in a repeated pattern of allocating personal expenses to the Funds and that she did so throughout the three-year period under review, an extended period of time. Additionally, she improperly allocated Broker-Dealer expenses to the Funds, which clearly was not authorized by the Offering Documents for the Funds and which was inconsistent with FINRA guidance.

It is also aggravating that Springsteen-Abbott engaged in other similar misconduct throughout the three-year period, allocating to the Funds her own business and personal expenses when she was a control person whose expenses were never allocable to the Funds. Moreover, in the course of the proceeding, it became apparent that even after she realized that her expenses were improperly allocated to the Funds, she continued to allocate to the Funds her husband's expenses after he became a control person.

²⁸³ Consistent with her attempted evasion of responsibility for the improper allocations of expenses, Springsteen-Abbott's post-hearing brief speaks as though it is not clear who was responsible for the improper allocations of personal expenses. It says, "During the Relevant Period, there were some personal expenses charged on the AMEX cards that were allocated to the Funds in error." Resp. PH Brief at 5. To the contrary, it is clear who is responsible for the admitted errors: Springsteen-Abbott.

²⁸⁴ Guidelines at 6 (Principal Consideration Nos.8-9).

(3) Springsteen-Abbott Attempted To Conceal Her Misconduct With False And Misleading Explanations And Documentation

Principal Consideration 10 concerns whether a respondent has attempted to conceal his or her misconduct from regulators.²⁸⁵ It is aggravating if so. Principal Consideration 12 also makes it an aggravating factor if a respondent impedes an investigation by attempting to conceal information from FINRA, or by providing inaccurate or misleading testimony or documentary information.²⁸⁶

In this case, Springsteen-Abbott sought to conceal from FINRA staff that she had allocated many personal expenses to the Funds. The Extended Hearing Panel found that she provided a number of false business justifications to FINRA staff and that the circumstances in some instances compel the conclusion that the business justifications were fabricated. The circumstances of the Borham attestation also create doubt as to Springsteen-Abbott's integrity. She continued throughout the investigation and the proceeding to attempt to conceal her misconduct.

(4) Springsteen-Abbott's Misconduct Injured Investors

Another factor adjudicators should consider is whether other parties, including particularly investors, have been injured by the misconduct. If so, Principal Consideration 11 suggests that the nature and extent of the injury should be considered.²⁸⁷

Springsteen-Abbott's misconduct injured the Fund's investors, as discussed above. Although, it is difficult to evaluate the nature and extent of the injury the Funds suffered, there is no question that the injury was ongoing throughout the three years at issue, and the improper allocations amounted, at a minimum, to more than a hundred thousand dollars.²⁸⁸

(5) Springsteen-Abbott's Misconduct Was Intentional

Principal Consideration 13 instructs adjudicators to consider whether the misconduct was the result of an intentional act, recklessness, or negligence.²⁸⁹ It is aggravating if the act was intentional or reckless. As discussed above, the Extended Hearing Panel finds that Springsteen-Abbott acted in bad faith. The record compels the conclusion that her misconduct was

²⁸⁵ Guidelines at 6 (Principal Consideration No. 10).

²⁸⁶ Guidelines at 6 (Principal Consideration No. 12).

²⁸⁷ Guidelines at 6 (Principal Consideration No. 11).

²⁸⁸ As discussed above, the Extended Hearing Panel rejects her argument that they were not injured because she claims that she offset the expenses by her voluntary contributions to the Funds. Even if she voluntarily provided the Funds some monetary benefits, she still misused the Funds' money—essentially shifting costs from herself and her companies to the Funds.

²⁸⁹ Guidelines at 7 (Principal Consideration No. 13).

intentional. Her attempts to conceal her misconduct with false and misleading business justifications support an inference of conscious wrongdoing.

(6) The Misconduct Resulted In Springsteen-Abbott's Monetary Gain

Principal Consideration 17 focuses on whether a respondent's misconduct held the potential for monetary gain to the respondent. In this case, there was a simple equation: anything allocated to the Funds was a pecuniary benefit to Springsteen-Abbott because she did not have to bear the expense, either personally or as the sole shareholder of the Parent Company. Her underlying motivation for the improper allocations was the potential for monetary gain, and that is an aggravating factor.

C. No Mitigating Factors

Principal Consideration 3 recommends that adjudicators should consider whether a respondent has voluntarily employed subsequent corrective measures, including revised procedures to prevent the recurrence of the misconduct, prior to detection or intervention by a regulator. Principal 4, similarly, focuses on whether a respondent has attempted to pay restitution prior to detection and intervention.²⁹⁰ Such actions by a respondent might be mitigating.

In this case, Springsteen-Abbott has represented to FINRA staff that she has modified the procedures for allocating expenses. She also has represented that she reallocated a number of the expenses alleged to have been improperly allocated to the Funds. However, Springsteen-Abbott undertook corrective action only after it became clear that the investigation was going to lead to further regulatory action, when FINRA staff notified her in August 2012 her that it intended to recommend the commencement of a disciplinary proceeding against her. Many of her correctives were implemented after the filing of the initial Complaint. Because Springsteen-Abbott changed her procedures and reallocated some expenses only in response to regulatory scrutiny, her actions are not mitigating.²⁹¹

As noted above, Springsteen-Abbott attributed some of the false business justifications she provided to FINRA staff to the fact that she was busy at the time and caring for her ailing father. To the extent that she is arguing that she was under stress and this is mitigating, that does not relieve her of responsibility for the earlier improper allocation of expenses to the Funds.

Nor is that stress mitigating as to her false statements to FINRA staff and the Extended Hearing Panel regarding the business nature of many of the meals at issue. The NAC recently rejected the argument that stress mitigated a respondent's false statements to his firm and to regulators, saying: "[T]here is no evidence that [the respondent's] stress interfered with his

²⁹⁰ Guidelines at 6, Principal Considerations 3 and 4.

²⁹¹ The Extended Hearing Panel makes no judgment regarding the efficacy of any changes in the procedures by which Springsteen-Abbott incurs and allocates expenses to the Funds.

ability to comply with FINRA rules or his understanding of what those rules required in terms of ethical conduct. [Respondent's] conduct did not involve a momentary, stress-caused lapse in, or interference with, his judgment. Instead, it involved several separate decisions that were... 'premeditated, intentional and ongoing.'"²⁹²

Both Springsteen-Abbott's initial improper allocations of expenses and her false statements regarding the business purposes for those expenses were "premeditated, intentional and ongoing." The NAC's decision instructs that her misconduct is not mitigated by the kind of stress she referred to in her testimony.

D. Springsteen-Abbott Is Not Treated Here As A Recidivist

Enforcement argues that Springsteen-Abbott is a recidivist, which would justify increased sanctions.²⁹³ Enforcement's argument is based on a September 27, 2013, SEC cease and desist order against Springsteen-Abbott among others. The SEC proceeding also dealt with the alleged improper allocation of expenses to the Funds, although it did not deal with personal expenses and Broker-Dealer expenses, as here. The theory of the SEC case was that Springsteen-Abbott had failed to disclose to the Funds that, under her interpretation, she was the only control person whose expenses were excluded from the expenses chargeable to the Funds. The Offering Documents had described ten to fifteen individuals and their functions in a way that made it appear that they would be included in the category of control persons. The Offering Documents thus made it appear that the Funds would not be charged for the expenses of those ten to fifteen individuals. The proceeding was settled with an order for Springsteen-Abbott and the Broker-Dealer, jointly and severally, to pay disgorgement of \$1,548,688 (less a credit of \$1,408,598 for reimbursements, contributions, and fee waivers already made to the Funds), prejudgment interest of \$77,566, and a civil monetary penalty of \$150,000.²⁹⁴

The Extended Hearing Panel here does not treat Springsteen-Abbott as a recidivist. The SEC proceeding involved an overlapping period of time and overlapping conduct. Although the proceeding was resolved before the resolution of this proceeding, it was not resolved before the commencement of this proceeding. This means that it cannot be said that she engaged in the misconduct alleged in this proceeding despite have already been subject to prior discipline for similar misconduct. She was not ignoring an SEC order when she engaged in the underlying misconduct in this case. Accordingly, the Extended Hearing Panel declines to impose increased sanctions merely on the basis of the existence of the settled SEC disciplinary proceeding.²⁹⁵

²⁹² *Dep't of Enforcement v. Saad*, No. 2006006705601R (NAC Mar. 16, 2015) (emphasis in original).

²⁹³ Enf. PH Brief 24.

²⁹⁴ Pre-Hearing Brief Of Complainant Department Of Enforcement 17.

²⁹⁵ See counsel for Respondent's argument, Hearing Tr. 353.

E. Springsteen-Abbott Engaged In Other Misconduct Similar To That Alleged In The Complaint

It is well-established that evidence of misconduct that is not alleged in the complaint, but which is similar to the misconduct charged in the complaint, is admissible to determine sanctions.²⁹⁶ The record contains evidence of other similar misconduct.

Springsteen-Abbott's allocation of her own expenses to the Funds, when she knew she was a control person whose expenses were never allocable to the Funds, was misconduct similar to that alleged in the Complaint. No subjective decision making was required in connection with the expenses of control persons. Even if Springsteen-Abbott was eating a meal and working on business, and even if she was working on the Funds' business, her expenses were not allocable to the Funds. And yet she did allocate her expenses to the Funds on a regular basis, month after month, for the entire three years under review. It was only after regulatory scrutiny that she recognized the issue and purported to take corrective action.

Springsteen-Abbott also improperly continued allocating her husband's expenses to the Funds even after she stopped allocating his salary and benefits to them. At the point he became a control person, his expenses were no longer allocable to the Funds.

This additional similar misconduct reflects on Springsteen-Abbott's integrity and ability to act ethically and honestly in the future.

F. Sanctions Imposed

Bar. The Extended Hearing Panel bars Springsteen-Abbott from associating with any FINRA member in any capacity because a bar is in the public interest. The Sanction Guidelines authorize a bar, citing the SEC's statement that a bar evidences a conclusion that the public interest is served by permanently excluding the barred person from the securities industry.²⁹⁷

²⁹⁶ See *Dep't of Enforcement v. McCrudden*, No. 2007008358101, 2010 FINRA Discip. LEXIS 25, at *26, n.19 (NAC Oct. 15, 2010) (citing *Wanda P. Sears*, Exchange Act Release No. 58075, 2008 SEC LEXIS 1521, at *22 n.33 (July 1, 2008) (finding, in an unauthorized trading case, that evidence of unauthorized trading, which was not alleged in the complaint, was admissible to gauge aggravating factors to assess sanctions); *Gateway Int'l Holdings, Inc.*, Exchange Act Release No. 53907, 2006 SEC LEXIS 1288, at *24 n.30 (May 31, 2006) (stating that, "[a]lthough we are not finding violations based on [other] failures [to file timely reports], we may consider them, and other matters that fall outside the [Order Instituting Proceedings], in assessing appropriate sanctions")).

²⁹⁷ Guidelines at 11 n.9.

The SEC's decision in *Steadman* sets out the factors that should be considered in determining whether to bar a person from the securities industry. In this case, all of the *Steadman* factors weigh in favor of a bar.²⁹⁸

As discussed above, numerous aggravating factors justify the most stringent sanctions here, and there are no mitigating factors. Springsteen-Abbott's misconduct was egregious. Her misconduct also was recurrent, month after month, when she improperly allocated expenses to the Funds. The Extended Hearing Panel has concluded that she knowingly engaged in the misconduct. She did so recklessly, if not knowingly, by using a system that combined personal expenses with business expenses on one American Express charge account. Springsteen-Abbott has made no assurances against future misconduct. To the contrary, she has insisted that her "judgments" regarding the allocation of expenses should not be second-guessed by regulators.²⁹⁹ Given her lack of recognition of the wrongful nature of her conduct, and the opportunities she would have for future violations if she were permitted to continue in the securities industry, the Extended Hearing Panel concludes it is in the public interest to bar Springsteen-Abbott from association with any FINRA member in any capacity.

This sanction is necessary to protect the investing public from an unrepentant wrongdoer. At no time in the course of the hearing did the Extended Hearing Panel see even a glimmer of remorse for the misconduct. The bar is appropriate because "the securities industry presents continual opportunities for dishonesty and abuse, and depends heavily on the integrity of its participants and on investors' confidence, it is essential that the highest ethical standards prevail in every facet of the securities industry."³⁰⁰

²⁹⁸ *Steadman v. SEC*, 603 F.2d 1126, 1140 (5th Cir. 1979), *aff'd on other grounds*, 450 U.S. 91 (1981). See also *J.S. Oliver Capital Management, L.P.*, Initial Decisions Release No. 649, 2014 SEC LEXIS 2812, at *141 (Aug. 5, 2014). The *Steadman* factors include the egregiousness of the misconduct, the isolated or recurrent nature of misconduct, the degree of scienter, the sincerity of respondent's assurances against future violations, the respondent's recognition of the wrongful nature of the conduct, and the likelihood that respondent's occupation will present opportunities for future violations.

²⁹⁹ Springsteen-Abbott asserted in her post-hearing brief, "[S]o long as [Springsteen-Abbott's] conduct was 'colorably justified' she cannot be found to have acted unethically." Resp. PH Brief 1. She also asserted that Enforcement's views regarding the validity of the expense allocations are entitled to no deference because Enforcement has no "expertise" in her business. She asserted that her "judgment" as to how her "unregulated business should be run [and] what expenses inure to the benefit of the Funds" is entitled to "substantial deference."

The Extended Hearing Panel has rejected the premise underlying these assertions. Springsteen-Abbott was not exercising judgment regarding a range of proper ways of allocating expenses. Rather, she was misusing investor monies when she charged expenses like her family's Thanksgiving dinner to the Funds.

³⁰⁰ *J.S. Oliver Capital*, 2014 SEC LEXIS 2812, at *146 (citing *Donald L. Koch*, 2014 SEC LEXIS 1684, at *86 (May 26, 2014)).

Disgorgement with prejudgment interest. The Extended Hearing Panel orders Springsteen-Abbott to disgorge \$208,953.75.³⁰¹ The Sanction Guidelines authorize disgorgement as a sanction.³⁰²

The primary purpose of disgorgement is to deprive the wrongdoer of her ill-gotten gain.³⁰³ Disgorgement is not a punitive measure. It is intended to prevent unjust enrichment.³⁰⁴ It also serves to deter others from similar misconduct.³⁰⁵ “Disgorgement need not be exact, instead, courts need only find that the amount sought is a reasonable approximation of gains that are causally connected to a violation.”³⁰⁶

Because disgorgement is intended to prevent a wrongdoer from profiting from the wrongdoing, it does not require precise exactitude. It is important to make sure that the wrongdoing is not profitable for the wrongdoer. “[T]he risk of uncertainty should fall on the wrongdoer whose illegal conduct created that uncertainty.”³⁰⁷ In this case, the risk of uncertainty should fall on Springsteen-Abbott for an additional reason. She exacerbated the difficulty of calculating a precise amount by her refusal to disclose which particular expenses she has identified as having been erroneously charged to the Funds.

³⁰¹ Enforcement sought restitution based on the amount of alleged improper allocations minus adjustments for expenses that Respondent claimed to have already reallocated or reimbursed to the Funds. Enforcement calculated the amount of restitution on this basis to be \$174,321.73. Enf. PH Brief at 25. Hearing Tr. (Edwards) 346-48; CX-128 (calculation for restitution).

Restitution focuses not on the amount of gain to the wrongdoer but, rather, on the amount of loss suffered by the victim. The Sanction Guidelines recommend that restitution be awarded where an identifiable person or entity suffers a quantifiable loss that was proximately caused by a respondent’s misconduct. Guidelines at 4 (Principal Consideration No. 5).

The Extended Hearing Panel declines to order restitution because it is impossible on this record to determine which Fund should receive how much of any restitution that could be ordered. The Funds bore different portions of the expenses, and the calculation for apportioning expenses changed, sometimes as frequently as each quarter. Although it is plain that the Funds as a group suffered a loss due to Springsteen-Abbott’s misconduct, the loss suffered by each identified Fund cannot be calculated and quantified.

The Extended Hearing Panel also declines to decrease the amount of disgorgement to the figure calculated by Enforcement for restitution. The Extended Hearing Panel believes that the full amount of improperly allocated expenses on the Expense Schedule should be disgorged. That figure is more appropriately remedial in the circumstances of this case.

³⁰² Guidelines at 5 and nn. 4 and 5, and at 10.

³⁰³ *Zacharias v. SEC*, 569 F.3d 458, 471 (D.C. Cir. 2009); *SEC v. Bilzerian*, 29 F.3d 689, 696 (D.C. Cir. 1994).

³⁰⁴ *Zacharias*, 569 F.3d at 472 (collecting cases).

³⁰⁵ *J.S. Oliver Capital*, 2014 SEC LEXIS 2812, at *151 (quoting *Montford & Co.*, 2014 SEC LEXIS 1529, at *94 (May 2, 2014)).

³⁰⁶ *SEC v. Capital Solutions Monthly Income Fund, L.P.*, 28 F. Supp. 3d 887, 897 (D. Minn. June 27, 2014). See also *SEC v. Patel*, 61 F.3d 137, 139 (2d Cir. 1995).

³⁰⁷ *SEC v. First City Fin. Corp.*, 890 F.2d 1215, 1232 (D.C. Cir. 1989). See also *Capital Solutions*, 28 F. Supp. 3d at 898 (“Defendants bear the risk of any uncertainty in the disgorgement analysis, and have failed to overcome any uncertainty on this issue.”).

Once Enforcement presented evidence reasonably approximating the amount of a defendant's ill-gotten gains, the burden shifted to Respondent to prove that amount was not reasonable.³⁰⁸ Springsteen-Abbott failed to carry that burden.

The Extended Hearing Panel also orders that Springsteen-Abbott pay pre-judgment interest beginning on February 12, 2012, until disgorgement is paid.³⁰⁹ Prejudgment interest is a matter of discretion for an adjudicator.³¹⁰ Where a violator has enjoyed access to funds over a period of time as a result of his wrongdoing, requiring the violator to pay prejudgment interest is consistent with the equitable purpose of disgorgement.³¹¹

Fine. The Extended Hearing Panel orders Springsteen-Abbott to pay a fine of \$100,000. It does so for the deterrent effect on her and others, and because the fine better ensures that Springsteen-Abbott does not retain the fruits of her wrongdoing.

The Sanction Guidelines provide that, in a sales practice case, adjudicators should impose a fine as well as disgorgement, even if a respondent is barred, in either of two circumstances: (i) where the case involves widespread, significant, and identifiable customer harm, or (ii) where the respondent has retained substantial ill-gotten gains.³¹² Although this is not a sales practice case, the Extended Hearing Panel views this commentary as instructive.

Both circumstances identified in the Sanction Guidelines exist here. First, Springsteen-Abbott's misconduct inflicted significant and identifiable harm on the Funds, and the Funds, indirectly (through the wholesaling process to other broker-dealers), were the only customers of her Broker-Dealer. Second, Springsteen-Abbott has obtained and retained substantial ill-gotten gains through her misconduct.

³⁰⁸ *SEC v. Utsick*, 2009 U.S. Dist. LEXIS 42061, at *41 (S.D. Fla. 2009) (citing *SEC v. Calvo*, 378 F.3d 1211, 1217 (11th Cir. 2004); *SEC v. First City Fin. Corp.*, 890 F.2d at 1232 *SEC v. Hughes Capital Corp.*, 917 F. Supp. 1080, 1085 (D.N.J. 1996), *aff'd*, 124 F.3d 449 (3rd Cir. 1997).

³⁰⁹ This date is the end of the three-year period defined by the Amended Complaint as the "relevant time period." Amended Complaint ¶ 13.

³¹⁰ *Hughes Capital*, 917 F. Supp. at 1089.

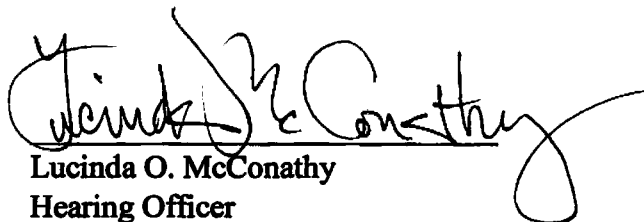
³¹¹ *Id.* at 1090.

³¹² Guidelines at 10.

VI. CONCLUSION

Kimberly Springsteen-Abbott violated FINRA Rule 2010. Accordingly, she is barred from association with any FINRA member in any capacity, ordered to pay disgorgement in the amount of \$208,953.75 together with interest from February 12, 2012, until paid,³¹³ fined \$100,000, and ordered to pay costs in the amount of \$11,037.14, which includes a \$750 administrative fee and the cost of the transcript.³¹⁴

If this decision becomes FINRA's final disciplinary action, the bar will take immediate effect, and the disgorgement, fine, and assessed costs shall be due on a date set by FINRA, but not sooner than 30 days after this decision becomes FINRA's final disciplinary action in this proceeding.



Lucinda O. McConathy
Hearing Officer
For the Extended Hearing Panel

Copies to:

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³¹³ The prejudgment interest rate shall be the rate established for the underpayment of income taxes in Section 6621(a) of the Internal Revenue Code, 26 U.S.C. § 6621(a), the same rate that is used for calculating interest on restitution awards. Guidelines at 11.

³¹⁴ The Hearing Panel has considered and rejects without discussion any other arguments made by the Parties that are inconsistent with this decision.

EXPENSE SCHEDULE

Attachment to Extended Hearing Panel Decision

Department of Enforcement v. Kimberly Springsteen-Abbott
Disciplinary Proceeding No. 2011025675501

CONVERSION TABLE FOR EXHIBIT 2 OF THE AMENDED COMPLAINT

Original Number	Amended Number	Purchaser	Date	Amount	Vendor	Location	Fund (y/n)	Expense Type	Changes
1	1	HA	Monday, December 22, 2008	\$176.15	L'Angolo Di Tivoli	West Chester, PA	Yes	Restaurant	
2	2	LF	Monday, December 22, 2008	\$9.81	McDonald's	Concordville, PA	Yes	Fast Food	
3	3	LF	Monday, December 22, 2008	\$18.29	Rite Aid	Wilmington, DE	Yes	Pharmacy	
4	4	HA	Monday, December 22, 2008	\$10.00	US Airways (Ticket for Ryan Cartell)	Phoenix, AZ	Yes	Air	
5	5	HA	Monday, December 22, 2008	\$11.22	Wawa	Concordville, PA	Yes	Gas Station/Store	
6	6	HA	Monday, December 22, 2008	\$11.82	Wawa	Concordville, PA	Yes	Gas Station/Store	
7	7	LF	Tuesday, December 23, 2008	\$29.35	Nino's Pizza	West Chester, PA	Yes	Restaurant	
8	8	HA	Tuesday, December 23, 2008	\$10.13	Sunoco	Boothwyn, PA	Yes	Gas Station/Store	
9	9	HA	Saturday, December 27, 2008	\$100.71	Safeway Store (Grocery)	Wilmington, DE	Yes	Grocery	
10	10	HA	Saturday, December 27, 2008	\$8.63	Wawa	Boothwyn, PA	Yes	Gas Station/Store	
11	11	HA	Sunday, December 28, 2008	\$23.12	China Dragon	Boothwyn, PA	Yes	Restaurant	
12	12	HA	Monday, December 29, 2008	\$51.81	Safeway Store (Grocery)	Wilmington, DE	Yes	Grocery	
13	13	HA	Monday, December 29, 2008	\$29.27	Wawa	Concordville, PA	Yes	Gas Station/Store	
14	14	HA	Tuesday, December 30, 2008	\$23.05	Capriotti's	Hockessin, DE	Yes	Restaurant	
15	15	HA	Wednesday, December 31, 2008	\$78.99	Outback	Glen Mills, PA	Yes	Restaurant	
16	16	HA	Saturday, January 03, 2009	\$19.49	Yum Corporation	Claymont, DE	Yes	Fast Food	
17	17	HA	Monday, January 05, 2009	\$52.04	Outback	Glen Mills, PA	Yes	Restaurant	
18	18	HA	Monday, January 05, 2009	\$55.55	Pescatore's Italian	Glen Mills, PA	Yes	Restaurant	
19	19	HA	Tuesday, January 06, 2009	\$36.34	El Gran Rodeo	West Chester, PA	Yes	Restaurant	
20	20	HA	Tuesday, January 06, 2009	\$41.98	McKenzie Brew House	Glen Mills, PA	Yes	Restaurant	
21	21	HA	Wednesday, January 07, 2009	\$70.07	CVS	Glen Mills, PA	Yes	Pharmacy	
22	22	HA	Wednesday, January 07, 2009	\$29.36	Nino's Pizza	Wilmington, DE	Yes	Restaurant	
23	23	LF	Wednesday, January 07, 2009	\$20.32	Primo Hoagies	Glen Mills, PA	Yes	Restaurant	
24	24	HA	Wednesday, January 07, 2009	\$5.49	Yum Corporation	Claymont, DE	Yes	Fast Food	
25	25	HA	Thursday, January 08, 2009	\$31.33	China Dragon	Boothwyn, PA	Yes	Restaurant	
26	26	HA	Thursday, January 08, 2009	\$35.10	L'Angolo Di Tivoli	West Chester, PA	Yes	Restaurant	
27	27	HA	Friday, January 09, 2009	\$42.26	Flemings	Edgewater, NJ	Yes	Restaurant	
28	28	HA	Friday, January 09, 2009	\$308.27	Flemings	Edgewater, NJ	Yes	Restaurant	
29	29	HA	Friday, January 09, 2009	\$45.64	Pescatore's Italian	Glen Mills, PA	Yes	Restaurant	
30	30	HA	Sunday, January 11, 2009	\$82.64	L'Angolo Di Tivoli	West Chester, PA	Yes	Restaurant	
31	31	HA	Monday, January 12, 2009	\$189.90	Harry's Savoy Grill	Wilmington, DE	Yes	Restaurant	
32	32	HA	Monday, January 12, 2009	\$3.82	McDonald's	Boothwyn, PA	Yes	Fast Food	
33	33	HA	Monday, January 12, 2009	\$52.42	Pescatore's Italian	Glen Mills, PA	Yes	Restaurant	
34	34	LF	Tuesday, January 13, 2009	\$19.35	Primo Hoagies	Glen Mills, PA	Yes	Restaurant	
35	35	HA	Wednesday, January 14, 2009	\$11.51	Burger King	Holiday, FL	Yes	Fast Food	
36	36	HA	Thursday, January 15, 2009	\$52.01	Alfano's Restaurant	Clearwater, FL	Yes	Restaurant	
37	37	LF	Thursday, January 15, 2009	\$63.43	Hooters	Glen Mills, PA	Yes	Restaurant	
38	38	KS	Thursday, January 15, 2009	\$41.86	Walgreens	Dunedin, FL	Yes	Pharmacy	
39	39	KS	Sunday, January 18, 2009	\$210.35	Publix	Holiday, FL	Yes	Grocery	
40	40	HA	Monday, January 19, 2009	\$38.60	Rainbow 50's Diner	Holiday, FL	Yes	Restaurant	
41	41	HA	Monday, January 19, 2009	\$5.35	Starbucks	Clearwater, FL	Yes	Fast Food	
42	42	HA	Tuesday, January 20, 2009	\$8.97	Dunkin Donuts	Holiday, FL	Yes	Fast Food	
43	43	HA	Tuesday, January 20, 2009	\$25.41	Nick's Cigo	Dunedin, FL	Yes	Gas Station/Store	
44	44	LF	Wednesday, January 21, 2009	\$4.83	McDonald's	Concordville, PA	Yes	Fast Food	
45	45	HA	Wednesday, January 21, 2009	\$16.27	Rainbow 50's Diner	Holiday, FL	Yes	Restaurant	
46	46	HA	Wednesday, January 21, 2009	\$10.36	Yum Corporation	Clearwater, FL	Yes	Fast Food	
47	47	HA	Thursday, January 22, 2009	\$216.96	Casaludovico	Palm Harbor, FL	Yes	Restaurant	
48	48	HA	Thursday, January 22, 2009	\$5.42	McDonald's	Holiday, FL	Yes	Fast Food	
49	49	HA	Thursday, January 22, 2009	\$29.50	The Peppermill	St. Petersburg, FL	Yes	Restaurant	
50	50	HA	Friday, January 23, 2009	\$675.84	Avis Rent A Car	Tampa, FL	Yes	Rental Cars	
51	51	HA	Friday, January 23, 2009	\$46.70	Chili's	Tampa, FL	Yes	Restaurant	
52	52	HA	Saturday, January 24, 2009	\$14.95	CVS	Glen Mills, PA	Yes	Pharmacy	
53	53	HA	Monday, January 26, 2009	\$29.26	Nino's Pizza	Wilmington, DE	Yes	Restaurant	

Original Number	Amended Number	Purchaser	Date	Amount	Vendor	Location	Fund (Y/N)	Expense Type	Changes
61	54	LF	Monday, January 26, 2009	\$64.01	Pescatore's Italian	Glen Mills, PA	Yes	Restaurant	
62	55	KS	Tuesday, January 27, 2009	\$10.84	Sharro	Philadelphia, PA	Yes	Fast Food	
63	56	HA	Wednesday, January 28, 2009	\$4.87	Arby's	West Chester, PA	Yes	Fast Food	
64	57	KS	Thursday, January 29, 2009	\$86.34	Cody's Original Roadhouse	Tarpon Springs, FL	Yes	Restaurant	
65	58	KS	Thursday, January 29, 2009	\$30.31	Grillmarks	Clearwater, FL	Yes	Restaurant	
67	59	HA	Friday, January 30, 2009	\$25.59	Clio Bistrot Wine	Philadelphia, PA	Yes	Restaurant	
68	60	LF	Friday, January 30, 2009	\$52.32	Macaroni Grill	Wilmington, DE	Yes	Restaurant	
69	61	LF	Friday, January 30, 2009	\$118.30	Pat's Pizzeria	Glen Mills, PA	Yes	Restaurant	
72	62	KS	Saturday, January 31, 2009	\$9.96	Dunkin Donuts	Holiday, FL	Yes	Fast Food	
73	63	HA	Saturday, January 31, 2009	\$88.37	Pickles Plus Too	Clearwater, FL	Yes	Restaurant	
74	64	KS	Sunday, February 01, 2009	\$73.85	CVS	Holiday, FL	Yes	Pharmacy	
75	65	HA	Sunday, February 01, 2009	\$40.54	Pickles Plus Too	Clearwater, FL	Yes	Restaurant	
76	66	HA	Sunday, February 01, 2009	\$11.42	Starbucks	Clearwater, FL	Yes	Fast Food	
77	67	HA	Sunday, February 01, 2009	\$215.45	Vincenzo's	Port Richey, FL	Yes	Restaurant	
81	68	LF	Tuesday, February 03, 2009	\$4.64	Arby's	West Chester, PA	Yes	Fast Food	
82	69	LF	Tuesday, February 03, 2009	\$4.05	Dunkin Donuts	Concordville, PA	Yes	Fast Food	
83	70	LF	Tuesday, February 03, 2009	\$174.54	Marshalls	Glen Mills, PA	Yes	Merchandise	
84	71	HA	Tuesday, February 03, 2009	\$7.77	McDonald's	Holiday, FL	Yes	Fast Food	
87	72	HA	Tuesday, February 03, 2009	\$23.86	Starbucks	Glen Mills, PA	Yes	Fast Food	
88	73	LF	Tuesday, February 03, 2009	\$19.85	Walgreens (Happy Harry's)	West Chester, PA	Yes	Pharmacy	Changed location from Clearwater, FL to West Chester, PA
89	74	LF	Wednesday, February 04, 2009	\$9.01	McDonald's	Concordville, PA	Yes	Fast Food	
90	75	LF	Wednesday, February 04, 2009	\$62.42	Outback	Glen Mills, PA	Yes	Restaurant	
95	76	LF	Thursday, February 05, 2009	\$59.68	Pat's Pizzeria	Glen Mills, PA	Yes	Restaurant	
96	77	HA	Thursday, February 05, 2009	\$22.22	Pickles Plus Too	Clearwater, FL	Yes	Restaurant	
98	78	HA	Friday, February 06, 2009	\$339.70	Casaludovico	Palm Harbor, FL	Yes	Restaurant	
99	79	LF	Friday, February 06, 2009	\$5.57	Dunkin Donuts	Chadds Ford, PA	Yes	Fast Food	
100	80	HA	Friday, February 06, 2009	\$7.77	McDonald's	Holiday, FL	Yes	Fast Food	
101	81	KS	Friday, February 06, 2009	\$242.80	Pickles Plus Too	Clearwater, FL	Yes	Restaurant	
102	82	KS	Saturday, February 07, 2009	\$24.37	DD/BR	Clearwater, FL	Yes	Fast Food	
103	83	HA	Saturday, February 07, 2009	\$9.05	McDonald's	Holiday, FL	Yes	Fast Food	
104	84	HA	Saturday, February 07, 2009	\$372.59	Home Depot	Clearwater, FL	Yes	Home Improvement	Changed Sweedday in Holiday, FL to Home Depot in Clearwater, FL and Grocery to Home-Improvement
105	85	HA	Saturday, February 07, 2009	\$4.36	Wendy's	Clearwater, FL	Yes	Fast Food	
107	86	KS	Sunday, February 08, 2009	\$94.32	Walgreens	Dunedin, FL	Yes	Pharmacy	
109	87	HA	Monday, February 09, 2009	\$159.64	Home Depot	Holiday, FL	Yes	Home Improvement	
110	88	HA	Monday, February 09, 2009	\$26.22	Pickles Plus Too	Clearwater, FL	Yes	Restaurant	
111	89	KS	Monday, February 09, 2009	\$243.54	Pickles Plus Too	Clearwater, FL	Yes	Restaurant	
112	90	KS	Monday, February 09, 2009	\$133.99	Pizza Hut	Clearwater, FL	Yes	Restaurant	
113	91	HA	Tuesday, February 10, 2009	\$154.19	Home Depot	Holiday, FL	Yes	Home Improvement	
114	92	LF	Tuesday, February 10, 2009	\$3.65	McDonald's	Wilmington, DE	Yes	Fast Food	
115	93	HA	Tuesday, February 10, 2009	\$6.84	McDonald's	Holiday, FL	Yes	Fast Food	
116	94	KS	Tuesday, February 10, 2009	\$195.20	Pickles Plus Too	Clearwater, FL	Yes	Restaurant	Changed \$195.20 to \$195.20
117	95	KS	Tuesday, February 10, 2009	\$72.61	Pizza Hut	Clearwater, FL	Yes	Restaurant	
118	96	KS	Wednesday, February 11, 2009	\$153.55	Chick-Fil-A	Clearwater, FL	Yes	Fast Food	
119	97	HA	Wednesday, February 11, 2009	\$1.18	Holiday Cigo	Holiday, FL	Yes	Gas Station/Store	
120	98	HA	Wednesday, February 11, 2009	\$57.18	Home Depot	Holiday, FL	Yes	Home Improvement	
121	99	KS	Wednesday, February 11, 2009	\$20.33	Home Depot	Holiday, FL	Yes	Home Improvement	
122	100	HA	Wednesday, February 11, 2009	\$699.14	Home Depot	Holiday, FL	Yes	Home Improvement	
123	101	HA	Wednesday, February 11, 2009	\$245.24	Massimo's	Palm Harbor, FL	Yes	Restaurant	
124	102	HA	Wednesday, February 11, 2009	\$7.90	McDonald's	Holiday, FL	Yes	Fast Food	
125	103	HA	Wednesday, February 11, 2009	\$8.30	McDonald's	Holiday, FL	Yes	Fast Food	
126	104	KS	Wednesday, February 11, 2009	\$247.42	Roly Poly Restaurant	Clearwater, FL	Yes	Fast Food	

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127	105	LF	Wednesday, February 11, 2009	\$65.88	Target	Wilmington, DE	Yes	Merchandise	
128	106	KS	Thursday, February 12, 2009	\$156.06	China City	Clearwater, FL	Yes	Restaurant	
129	107	HA	Thursday, February 12, 2009	\$513.22	Home Depot	Holiday, FL	Yes	Home Improvement	
130	108	HA	Thursday, February 12, 2009	\$20.33	Home Depot	Holiday, FL	Yes	Home Improvement	
131	109	LF	Thursday, February 12, 2009	\$61.34	Saladworks	Wilmington, DE	Yes	Fast Food	Changed Middletown, DE to Holiday, FL
132	110	HA	Thursday, February 12, 2009	\$87.88	Sam Seltzers	Port Richey, FL	Yes	Restaurant	Changed Holiday, FL to Wilmington, DE
133	111	HA	Thursday, February 12, 2009	\$60.00	Sam Seltzers	Port Richey, FL	Yes	Restaurant	
134	112	HA	Thursday, February 12, 2009	\$2.85	Shell Oil	Port Richey, FL	Yes	Restaurant	Changed Wilmington, DE to Port Richey, FL
135	113	LF	Thursday, February 12, 2009	\$71.61	Simoco	Tarpon Springs, FL	Yes	Gas Station/Store	Changed Port Richey, FL to Tarpon Springs, FL
136	114	LF	Thursday, February 12, 2009	\$36.32	Walgreens (Happy Harry's)	Odesa, DE	Yes	Gas Station/Store	Changed Tarpon Springs, FL to Odesa, DE
137	115	KS	Friday, February 13, 2009	\$184.43	CVS	Middletown, DE	Yes	Pharmacy	Changed Odesa, FL to Middletown, DE
138	116	HA	Friday, February 13, 2009	\$10.70	Holiday Family Restaurant	Dunedin, FL	Yes	Pharmacy	
139	117	KS	Friday, February 13, 2009	\$182.15	Roly Poly Restaurant	Holiday, FL	Yes	Restaurant	
140	118	HA	Friday, February 13, 2009	\$189.29	Villa Gallace	Clearwater, FL	Yes	Fast Food	
141	119	HA	Sunday, February 15, 2009	\$392.92	The Peppermill	Indian Rocks, FL	Yes	Restaurant	
142	120	HA	Monday, February 16, 2009	\$7.77	McDonald's	St. Petersburg, FL	Yes	Restaurant	
143	121	KS	Monday, February 16, 2009	\$146.73	Qeefer's	Holiday, FL	Yes	Fast Food	
144	122	LF	Monday, February 16, 2009	\$167.34	Publix	Clearwater, FL	Yes	Restaurant	
146	123	LF	Monday, February 16, 2009	\$49.35	Walgreens	Clearwater, FL	Yes	Grocery	
147	124	HA	Tuesday, February 17, 2009	\$967.94	Avis Rent A Car	Clearwater, FL	Yes	Pharmacy	
148	125	KS	Tuesday, February 17, 2009	\$22.50	DD/BR	Tampa, FL	Yes	Rental Cars	
149	126	HA	Tuesday, February 17, 2009	\$25.04	Holiday Cigo	Palm Harbor, FL	Yes	Fast Food	
150	127	KS	Tuesday, February 17, 2009	\$275.97	Pickles Plus Too	Holiday, FL	Yes	Gas Station/Store	
151	128	KS	Tuesday, February 17, 2009	\$161.23	Pizza Hut	Clearwater, FL	Yes	Restaurant	
152	129	LF	Tuesday, February 17, 2009	\$46.00	Tilted Kilt	Clearwater, FL	Yes	Restaurant	
153	130	KS	Thursday, February 19, 2009	\$253.06	Chick-Fil-A	Clearwater, FL	Yes	Fast Food	
154	131	KS	Wednesday, February 18, 2009	\$151.38	China City	Clearwater, FL	Yes	Restaurant	Changed 2/19/09 to 2/19/08
155	132	HA	Thursday, February 19, 2009	\$8.41	McDonald's	Holiday, FL	Yes	Fast Food	
156	133	KS	Thursday, February 19, 2009	\$277.54	Roly Poly Restaurant	Clearwater, FL	Yes	Fast Food	
157	134	HA	Friday, February 20, 2009	\$21.00	Holiday Cigo	Holiday, FL	Yes	Gas Station/Store	
159	135	KS	Friday, February 20, 2009	\$128.09	Pizza Hut	Clearwater, FL	Yes	Restaurant	
160	136	HA	Saturday, February 21, 2009	\$323.52	Casaltudovico	Clearwater, FL	Yes	Restaurant	
161	137	HA	Saturday, February 21, 2009	\$9.61	Checkers	Palm Harbor, FL	Yes	Restaurant	
162	138	KS	Sunday, February 22, 2009	\$10.51	Dunkin Donuts	Holiday, FL	Yes	Fast Food	
163	139	KS	Sunday, February 22, 2009	\$120.00	Hemingways on Lake Tarpon	Holiday, FL	Yes	Fast Food	
164	140	HA	Sunday, February 22, 2009	\$7.37	McDonald's	Palm Harbor, FL	Yes	Restaurant	
165	141	LF	Sunday, February 22, 2009	\$54.89	Smoley Bones	Holiday, FL	Yes	Fast Food	
166	142	LF	Monday, February 23, 2009	\$75.13	Giordanos	Clearwater, FL	Yes	Restaurant	
167	143	HA	Monday, February 23, 2009	\$54.64	Planet Café	Port Richey, FL	Yes	Restaurant	
168	144	KS	Monday, February 23, 2009	\$287.44	Roly Poly Restaurant	Clearwater, FL	Yes	Restaurant	
169	145	LF	Tuesday, February 24, 2009	\$195.34	Island Way Grill	Clearwater, FL	Yes	Fast Food	
170	146	KS	Tuesday, February 24, 2009	\$300.24	Pickles Plus Too	Clearwater, FL	Yes	Restaurant	
171	147	HA	Wednesday, February 25, 2009	\$72.13	Angelo's Pizza	Clearwater, FL	Yes	Restaurant	
172	148	HA	Wednesday, February 25, 2009	\$8.41	McDonald's	Holiday, FL	Yes	Restaurant	
173	149	KS	Wednesday, February 25, 2009	\$244.08	Pizza Hut	Holiday, FL	Yes	Fast Food	
174	150	LF	Wednesday, February 25, 2009	\$28.78	Walgreens	Clearwater, FL	Yes	Restaurant	
175	151	HA	Thursday, February 26, 2009	\$36.25	Alfano's Restaurant	Clearwater, FL	Yes	Pharmacy	
176	152	KS	Thursday, February 26, 2009	\$178.90	China City	Clearwater, FL	Yes	Restaurant	
177	153	HA	Thursday, February 26, 2009	\$96.18	Hemingways on Lake	Clearwater, FL	Yes	Restaurant	
178	154	HA	Thursday, February 26, 2009	\$5.42	McDonald's	Palm Harbor, FL	Yes	Restaurant	
179	155	LF	Friday, February 27, 2009	\$5.40	McDonald's	Holiday, FL	Yes	Fast Food	
180	156	KS	Friday, February 27, 2009	\$5.42	McDonald's	Middletown, DE	Yes	Fast Food	
181	157	KS	Friday, February 27, 2009	\$234.77	Pizza Hut	Holiday, FL	Yes	Fast Food	
184	158	HA	Saturday, February 28, 2009	\$17.10	Golden Eagle Diner	Clearwater, FL	Yes	Restaurant	
						Palisades Park, NJ	Yes	Restaurant	

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185	159	HA	Saturday, February 28, 2009	\$29.03	Lukeoil	Mt. Laurel, NJ	Yes	Gas Station/Store	
186	160	KS	Saturday, February 28, 2009	\$30.95	Maggianno's	Tampa, FL	Yes	Restaurant	
187	161	HA	Saturday, February 28, 2009	\$4.56	McDonald's	Boothwyn, PA	Yes	Fast Food	
188	162	LF	Sunday, March 01, 2009	\$14.98	Borders	Philadelphia, PA	Yes	Merchandise	
189	163	LF	Sunday, March 01, 2009	\$7.48	McDonald's	Clearwater, FL	Yes	Fast Food	
190	164	KS	Sunday, March 01, 2009	\$235.95	Publix	Holiday, FL	Yes	Grocery	
191	165	KS	Monday, March 02, 2009	\$177.61	China City	Clearwater, FL	Yes	Restaurant	
192	166	HA	Monday, March 02, 2009	\$6.28	McDonald's	Holiday, FL	Yes	Fast Food	
193	167	KS	Monday, March 02, 2009	\$100.00	Pickles Plus Too	Clearwater, FL	Yes	Restaurant	
194	168	HA	Monday, March 02, 2009	\$23.65	Pickles Plus Too	Clearwater, FL	Yes	Restaurant	
196	169	HA	Monday, March 02, 2009	\$158.25	Rossi Italiano Restaurant	Port Richey, FL	Yes	Restaurant	
197	170	HA	Tuesday, March 03, 2009	\$347.64	Casaludovico	Palm Harbor, FL	Yes	Restaurant	
198	171	HA	Tuesday, March 03, 2009	\$25.49	Hess	Palm Harbor, FL	Yes	Gas Station/Store	
199	172	LF	Tuesday, March 03, 2009	\$7.48	McDonald's	Clearwater, FL	Yes	Fast Food	
200	173	LF	Tuesday, March 03, 2009	\$9.35	Panera Bread	Clearwater, FL	Yes	Restaurant	
201	174	HA	Tuesday, March 03, 2009	\$21.61	Pickles Plus Too	Clearwater, FL	Yes	Restaurant	
202	175	KS	Tuesday, March 03, 2009	\$224.21	Roly Poly Restaurant	Clearwater, FL	Yes	Fast Food	
203	176	HA	Wednesday, March 04, 2009	\$4.91	McDonald's	Dunedin, FL	Yes	Fast Food	
204	177	KS	Wednesday, March 04, 2009	\$11.60	McDonald's	Holiday, FL	Yes	Fast Food	
205	178	KS	Wednesday, March 04, 2009	\$280.71	Pickles Plus too	Clearwater, FL	Yes	Restaurant	
208	179	HA	Thursday, March 05, 2009	\$6.39	McDonald's	Holiday, FL	Yes	Fast Food	
209	180	KS	Thursday, March 05, 2009	\$231.70	Roly Poly Restaurant	Clearwater, FL	Yes	Fast Food	
210	181	HA	Friday, March 06, 2009	\$59.81	Helman's Restaurant	Clearwater, FL	Yes	Restaurant	
211	182	HA	Friday, March 06, 2009	\$5.42	McDonald's	Holiday, FL	Yes	Fast Food	
212	183	KS	Friday, March 06, 2009	\$221.26	Pizza Hut	Clearwater, FL	Yes	Restaurant	
213	184	LF	Friday, March 06, 2009	\$38.63	Target	Tampa, FL	Yes	Merchandise	
214	185	HA	Saturday, March 07, 2009	\$57.10	Angelo's Pizza	Holiday, FL	Yes	Restaurant	
215	186	HA	Saturday, March 07, 2009	\$49.48	Hilton Beach Resort	Clearwater, FL	Yes	Hotel	
216	187	HA	Saturday, March 07, 2009	\$278.57	Hilton Beach Resort	Clearwater, FL	Yes	Hotel	
217	188	LF	Saturday, March 07, 2009	\$8.55	Walgreens	Clearwater, FL	Yes	Pharmacy	
218	189	LF	Sunday, March 08, 2009	\$6.83	Walgreens	Clearwater, FL	Yes	Pharmacy	
220	190	LF	Monday, March 09, 2009	\$9.61	Boston Market	Clearwater, FL	Yes	Restaurant	
221	191	HA	Monday, March 09, 2009	\$21.14	CVS	Washington, DC	Yes	Pharmacy	
222	192	KS	Tuesday, March 10, 2009	\$7.52	California Tortilla	Washington, DC	Yes	Restaurant	
223	193	KS	Wednesday, March 11, 2009	\$206.55	Roly Poly Restaurant	Clearwater, FL	Yes	Fast Food	Changed 3/19/09 to 3/11/09
224	194	KS	Tuesday, March 10, 2009	\$35.10	Thunder Grill	Washington, DC	Yes	Restaurant	
225	195	HA	Wednesday, March 11, 2009	\$7.67	Dunkin Donuts	Holiday, FL	Yes	Fast Food	
226	196	LF	Wednesday, March 11, 2009	\$157.47	Eddies Bar and Grill	Dunedin, FL	Yes	Restaurant	
227	197	HA	Wednesday, March 11, 2009	\$421.88	Maggianno's	Tampa, FL	Yes	Restaurant	
228	198	HA	Thursday, March 12, 2009	\$41.35	Angelo's Pizza	Holiday, FL	Yes	Restaurant	
230	199	HA	Thursday, March 12, 2009	\$21.00	Rainbow 50's Diner	Holiday, FL	Yes	Restaurant	
231	200	LF	Thursday, March 12, 2009	\$4.16	Starbucks	Tampa, FL	Yes	Fast Food	
232	201	HA	Friday, March 13, 2009	\$58.29	Cody's Original Roadhouse	Tarpon Springs, FL	Yes	Restaurant	
233	202	HA	Saturday, March 14, 2009	\$98.58	Sweetbay	Holiday, FL	Yes	Grocery	
234	203	HA	Saturday, March 14, 2009	\$28.81	Yum Corporation	Port Richey, FL	Yes	Fast Food	
235	204	LF	Sunday, March 15, 2009	\$9.45	McDonald's	Middletown, DE	Yes	Fast Food	
236	205	LF	Sunday, March 15, 2009	\$26.44	Walgreens (Happy Harry's)	Middletown, DE	Yes	Pharmacy	
237	206	HA	Monday, March 16, 2009	\$5.75	McDonald's	Holiday, FL	Yes	Fast Food	
238	207	LF	Monday, March 16, 2009	\$65.18	Pat's Pizzeria	Glen Mills, PA	Yes	Restaurant	
239	208	KS	Monday, March 16, 2009	\$56.57	Pickles Plus Too	Clearwater, FL	Yes	Restaurant	
240	209	HA	Monday, March 16, 2009	\$81.46	Sam Seltzers	Clearwater, FL	Yes	Restaurant	
241	210	HA	Tuesday, March 17, 2009	\$34.90	Highland SQ Amoco	Clearwater, FL	Yes	Gas Station/Store	
242	211	HA	Tuesday, March 17, 2009	\$269.52	Jimmy Guana Sunset	Clearwater, FL	Yes	Restaurant	
243	212	HA	Tuesday, March 17, 2009	\$29.50	The Peppermill	St. Petersburg, FL	Yes	Restaurant	

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244	213	HA	Wednesday, March 18, 2009	\$23.75	The Peppermill	St. Petersburg, FL	Yes	Restaurant	
245	214	HA	Thursday, March 19, 2009	\$26.52	China City	Clearwater, FL	Yes	Restaurant	
246	215	LF	Thursday, March 19, 2009	\$3.49	McDonald's	Wilmington, DE	Yes	Fast Food	
247	216	HA	Thursday, March 19, 2009	\$7.88	McDonald's	Holiday, FL	Yes	Fast Food	
249	217	LF	Friday, March 20, 2009	\$79.95	A Plus Cleaners	Middletown, DE	Yes	Dry Cleaner	
251	218	LF	Friday, March 20, 2009	\$25.00	FINRA Education & Training	online	Yes	Other	
252	219	HA	Friday, March 20, 2009	\$8.60	Starbucks	Clearwater, FL	Yes	Fast Food	
253	220	KS	Saturday, March 21, 2009	\$45.90	Angelo's Pizza	Holiday, FL	Yes	Restaurant	
254	221	KS	Sunday, March 22, 2009	\$502.29	Publix	Holiday, FL	Yes	Grocery	
255	222	HA	Monday, March 23, 2009	\$140.38	Holiday Cleaners	Holiday, FL	Yes	Dry Cleaner	
258	223	LF	Tuesday, March 24, 2009	\$3.87	McDonald's	Concordville, PA	Yes	Fast Food	
260	224	HA	Tuesday, March 24, 2009	\$22.54	Pickles Plus Too	Clearwater, FL	Yes	Restaurant	
261	225	HA	Wednesday, March 25, 2009	\$59.38	Angelo's Pizza	Holiday, FL	Yes	Restaurant	
263	226	LF	Wednesday, March 25, 2009	\$36.22	Publix	Clearwater, FL	Yes	Grocery	
265	227	HA	Thursday, March 26, 2009	\$26.82	Dunkin Donuts	Holiday, FL	Yes	Fast Food	
270	228	HA	Friday, March 27, 2009	\$3.51	McDonald's	Holiday, FL	Yes	Fast Food	
273	229	LF	Sunday, March 29, 2009	\$7.26	Flat Bread	Tampa, FL	Yes	Fast Food	
274	230	HA	Monday, March 30, 2009	\$22.87	KFC	Claymont, DE	Yes	Fast Food	
275	231	LF	Monday, March 30, 2009	\$65.45	Nino's Pizza	Wilmington, DE	Yes	Restaurant	
276	232	LF	Monday, March 30, 2009	\$4.00	Saladworks	West Chester, PA	Yes	Fast Food	
277	233	LF	Monday, March 30, 2009	\$32.49	Saladworks	West Chester, PA	Yes	Fast Food	
278	234	LF	Monday, March 30, 2009	\$20.69	Sunoco	Odessa, DE	Yes	Gas Station/Store	Changed Odessa, FL to Odessa, DE
279	235	HA	Tuesday, March 31, 2009	\$65.56	Pescatore's Italian	Glen Mills, PA	Yes	Restaurant	
280	236	HA	Wednesday, April 01, 2009	\$83.65	Harry's Sawy Grill	Wilmington, DE	Yes	Restaurant	
281	237	HA	Thursday, April 02, 2009	\$183.52	The Palm	Philadelphia, PA	Yes	Restaurant	
282	238	KS	Friday, April 03, 2009	\$39.35	Pescatore's Italian	Glen Mills, PA	Yes	Restaurant	
283	239	HA	Saturday, April 04, 2009	\$42.15	10 Min Oil Lube	Westwood, NJ	Yes	Gas Station/Store	
284	240	HA	Saturday, April 04, 2009	\$159.85	CalFedalce	New York, NY	Yes	Restaurant	
285	241	HA	Saturday, April 04, 2009	\$32.16	Lukeoil	Mt. Laurel, NJ	Yes	Gas Station/Store	
286	242	HA	Saturday, April 04, 2009	\$4.56	McDonald's	Boothwyn, PA	Yes	Fast Food	
287	243	HA	Saturday, April 04, 2009	\$24.00	Pace One Restaurant	Thornton, CO	Yes	Restaurant	Changed Thornton, CO to Thornton, PA
288	244	HA	Saturday, April 04, 2009	\$251.54	Pace One Restaurant	Thornton, CO	Yes	Restaurant	Changed Thornton, CO to Thornton, PA
289	245	LF	Saturday, April 04, 2009	\$144.06	Primo Hoagies	Glen Mills, PA	Yes	Restaurant	
290	246	HA	Sunday, April 05, 2009	\$371.75	Aus Rent A Car	Palm Harbor, FL	Yes	Rental Cars	Changed Palm Harbor, FL to Philadelphia, PA
291	247	HA	Sunday, April 05, 2009	\$65.36	Cho Bistro and Wine	Philadelphia, PA	Yes	Restaurant	
292	248	HA	Sunday, April 05, 2009	\$18.12	Essington Valero	Tinicum Town, PA	Yes	Gas Station/Store	
293	249	KS	Monday, April 06, 2009	\$139.91	Brookstone	Tampa, FL	Yes	Merchandise	
294	250	HA	Monday, April 06, 2009	\$395.24	Ruths Chris Steak	Tampa, FL	Yes	Restaurant	
295	251	HA	Monday, April 06, 2009	\$43.65	Shell Oil	Tampa, FL	Yes	Gas Station/Store	
296	252	HA	Monday, April 06, 2009	\$47.92	The Peppermill	St. Petersburg, FL	Yes	Restaurant	
297	253	LF	Tuesday, April 07, 2009	\$41.55	Olive Garden	Talleyville, DE	Yes	Restaurant	
298	254	LF	Tuesday, April 07, 2009	\$28.21	Sweet Basil	Chadds Ford, PA	Yes	Restaurant	
299	255	HA	Wednesday, April 08, 2009	\$44.27	Angelo's Pizza	Holiday, FL	Yes	Restaurant	
300	256	HA	Wednesday, April 08, 2009	\$8.84	McDonald's	Holiday, FL	Yes	Fast Food	
301	257	KS	Thursday, April 09, 2009	\$34.16	CVS	Holiday, FL	Yes	Pharmacy	
302	258	HA	Thursday, April 09, 2009	\$108.66	Holiday Cleaners	Holiday, FL	Yes	Dry Cleaner	
303	259	KS	Monday, April 13, 2009	\$82.58	Ruby Tuesday	Clearwater, FL	Yes	Restaurant	
304	260	HA	Tuesday, April 14, 2009	\$19.21	Angelo's Pizza	Holiday, FL	Yes	Restaurant	
306	261	HA	Wednesday, April 15, 2009	\$19.22	Pickles Plus Too	Clearwater, FL	Yes	Restaurant	
307	262	HA	Thursday, April 16, 2009	\$32.96	Alfonso Restaurant	Clearwater, FL	Yes	Restaurant	
308	263	HA	Thursday, April 16, 2009	\$17.11	KFC	Port Richey, FL	Yes	Fast Food	
309	264	HA	Friday, April 17, 2009	\$42.45	7-Eleven	Tampa, FL	Yes	Fast Food	
310	265	HA	Friday, April 17, 2009	\$54.90	Angelo's Pizza	Holiday, FL	Yes	Restaurant	
311	266	HA	Friday, April 17, 2009	\$7.88	McDonald's	Holiday, FL	Yes	Fast Food	

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312	267	HA	Saturday, April 18, 2009	\$37.72	Rainbow 50's Diner	Holiday, FL	Yes	Restaurant	
313	268	LF	Sunday, April 19, 2009	\$15.16	Arby's	Wilmington, DE	Yes	Fast Food	
314	269	HA	Sunday, April 19, 2009	\$293.06	Tio Pepe Restaurant	Clearwater, FL	Yes	Restaurant	
315	270	KS	Monday, April 20, 2009	\$86.09	CVS	New Port Richey, FL	Yes	Pharmacy	
316	271	HA	Monday, April 20, 2009	\$88.05	Rossi Ristorante	Port Richey, FL	Yes	Restaurant	
317	272	LF	Tuesday, April 21, 2009	\$18.48	Applebees	Middletown, DE	Yes	Restaurant	
319	273	KS	Tuesday, April 28, 2009	\$12.59	Sbarros	Las Vegas, NV	Yes	Fast Food	
320	274	KS	Tuesday, April 28, 2009	\$217.55	Sweetbay	Holiday, FL	Yes	Grocery	
321	275	HA	Tuesday, April 28, 2009	\$109.29	Verizon Wireless	Las Vegas, NV	Yes	Phone	
323	276	LF	Wednesday, April 29, 2009	\$22.65	Olive Garden	Talleyville, DE	Yes	Restaurant	
324	277	KS	Wednesday, April 29, 2009	\$24.63	Pickles Plus Too	Clearwater, FL	Yes	Restaurant	
325	278	KS	Friday, May 01, 2009	\$78.29	Angelo's Pizza	Holiday, FL	Yes	Restaurant	
326	279	KS	Saturday, May 02, 2009	\$138.77	Tate Island Grill	Clearwater, FL	Yes	Restaurant	
327	280	KS	Monday, May 04, 2009	\$59.13	Cody's Original Roadhouse	Tarpon Springs, FL	Yes	Restaurant	
328	281	HA	Monday, May 04, 2009	\$44.58	Pescatores Italian	Glen Mills, PA	Yes	Restaurant	
329	282	HA	Tuesday, May 05, 2009	\$189.23	44&X Hell's Kitchen	New York, NY	Yes	Restaurant	
328	283	LF	Monday, May 11, 2009	\$3.87	McDonald's	Concordville, PA	Yes	Fast Food	
339	284	KS	Monday, May 11, 2009	\$121.18	Pickles Plus Too	Clearwater, FL	Yes	Restaurant	
340	285	HA	Monday, May 11, 2009	\$127.42	Rossi Ristorante	Port Richey, FL	Yes	Restaurant	
341	286	LF	Monday, May 11, 2009	\$4.50	Saladworks	West Chester, PA	Yes	Fast Food	
342	287	LF	Monday, May 11, 2009	\$33.33	Saladworks	West Chester, PA	Yes	Fast Food	
343	288	HA	Tuesday, May 12, 2009	\$59.17	Angelo's Pizza	Holiday, FL	Yes	Restaurant	
344	289	HA	Tuesday, May 12, 2009	\$43.54	Holiday Cigo	Holiday, FL	Yes	Gas Station/Store	
345	290	LF	Tuesday, May 12, 2009	\$25.60	Sunoco	Wilmington, DE	Yes	Gas Station/Store	
346	291	HA	Wednesday, May 13, 2009	\$142.50	Okeefe's	Clearwater, FL	Yes	Restaurant	
347	292	LF	Wednesday, May 13, 2009	\$30.70	Primo Hoagies	Clearwater, FL	Yes	Restaurant	
349	293	HA	Friday, May 15, 2009	\$52.00	Cody's Original Roadhouse	Tarpon Springs, FL	Yes	Restaurant	
350	294	HA	Friday, May 15, 2009	\$22.04	Holiday Cigo	Holiday, FL	Yes	Gas Station/Store	
351	295	KS	Friday, May 15, 2009	\$26.24	McDonald's	New Port Richey, FL	Yes	Fast Food	
352	296	LF	Friday, May 15, 2009	\$25.29	Mugs on Missouri	Clearwater, FL	Yes	Restaurant	
353	297	HA	Friday, May 15, 2009	\$23.84	Pickles Plus Too	Clearwater, FL	Yes	Restaurant	
354	298	LF	Friday, May 15, 2009	\$6.72	Walgreens	Clearwater, FL	Yes	Pharmacy	
355	299	HA	Saturday, May 16, 2009	\$119.95	Cody's Original Roadhouse	Tarpon Springs, FL	Yes	Restaurant	
356	300	HA	Saturday, May 16, 2009	\$34.74	Holiday Cigo	Holiday, FL	Yes	Gas Station/Store	
357	301	KS	Saturday, May 16, 2009	\$54.82	Publix	Clearwater, FL	Yes	Grocery	
358	302	LF	Saturday, May 16, 2009	\$44.45	Publix	Clearwater, FL	Yes	Grocery	
359	303	KS	Saturday, May 16, 2009	\$38.33	Stop N'Karry Gas Station/Store	Largo, FL	Yes	Gas Station/Store	
360	304	LF	Sunday, May 17, 2009	\$7.26	Flat Bread	Tampa, FL	Yes	Fast Food	
361	305	HA	Sunday, May 17, 2009	\$184.91	Positano Ristorante	Palm Harbor, FL	Yes	Restaurant	
362	306	HA	Monday, May 18, 2009	\$89.86	Catches Restaurant	Port Richey, FL	Yes	Restaurant	
363	307	LF	Monday, May 18, 2009	\$5.62	McDonald's	Concordville, PA	Yes	Fast Food	
364	308	HA	Monday, May 18, 2009	\$5.66	McDonald's	Holiday, FL	Yes	Fast Food	
365	309	KS	Tuesday, May 19, 2009	\$131.25	Chili's	New Port Richey, FL	Yes	Restaurant	
366	310	HA	Tuesday, May 19, 2009	\$17.82	Rainbow 50's Diner	Holiday, FL	Yes	Restaurant	
367	311	HA	Wednesday, May 20, 2009	\$44.20	Exxon Mobil	Waverly, NJ	Yes	Gas Station/Store	
368	312	HA	Wednesday, May 20, 2009	\$35.23	Hess	Holiday, FL	Yes	Gas Station/Store	
369	313	LF	Wednesday, May 20, 2009	\$4.99	McDonald's	Concordville, PA	Yes	Fast Food	
370	314	HA	Wednesday, May 20, 2009	\$7.99	McDonald's	Holiday, FL	Yes	Fast Food	
371	315	LF	Wednesday, May 20, 2009	\$25.77	Samoco	Odessa, DE	Yes	Fast Food	Changed Odessa, FL to Odessa, DE
372	316	HA	Friday, May 22, 2009	\$30.83	Exxon Mobil	Mt. Laurel, NJ	Yes	Gas Station/Store	
373	317	HA	Friday, May 22, 2009	\$3.61	McDonald's	Boothwyn, PA	Yes	Fast Food	
374	318	KS	Friday, May 22, 2009	\$77.80	Pescatores Italian	Glen Mills, PA	Yes	Restaurant	
375	319	HA	Saturday, May 23, 2009	\$29.87	KFC	Claymont, DE	Yes	Fast Food	
376	320	LF	Saturday, May 23, 2009	\$21.34	Wawa	New Castle, NJ	Yes	Gas Station/Store	

Original Number	Amended Number	Purchaser	Date	Amount	Vendor	Location	Fund (Y/N)	Expense Type	Changes
377	321	HA	Monday, May 25, 2009	\$68.08	CVS	Glen Mills, PA	Yes	Pharmacy	
378	322	HA	Tuesday, May 26, 2009	\$73.67	Paradise	Philadelphia, PA	Yes	Merchandise	
379	323	HA	Tuesday, May 26, 2009	\$16.63	Quinos	Phoenix, AZ	Yes	Fast Food	
380	324	LF	Thursday, May 28, 2009	\$29.55	TGI Fridays	West Chester, PA	Yes	Restaurant	
381	325	HA	Wednesday, June 03, 2009	\$251.60	Flori D'Italia	Anchorage, AK	Yes	Restaurant	
382	326	HA	Thursday, June 04, 2009	\$10.47	Carvel/Pizza	Phoenix, AZ	Yes	Restaurant	
383	327	LF	Thursday, June 04, 2009	\$19.74	Pat's Pizzeria	Glen Mills, PA	Yes	Restaurant	
388	328	HA	Tuesday, June 09, 2009	\$35.47	Wawa	Concordville, PA	Yes	Gas Station/Store	
389	329	KS	Wednesday, June 10, 2009	\$50.00	FINRA Education & Training	online	Yes	Other	
390	330	HA	Wednesday, June 10, 2009	\$59.25	Pescatores Italian	Glen Mills, PA	Yes	Restaurant	
391	331	LF	Thursday, June 11, 2009	\$39.60	Caruso	Middletown, DE	Yes	Restaurant	
392	332	KS	Thursday, June 11, 2009	\$29.43	Delco's Original (food)	Chadds Ford, PA	Yes	Restaurant	
393	333	HA	Thursday, June 11, 2009	\$25.07	Friendly's Ice Cream	West Chester, PA	Yes	Restaurant	
394	334	LF	Thursday, June 11, 2009	\$28.41	Sunoco	Odessa, DE	Yes	Gas Station/Store	Changed Odessa, FL to Odessa, DE
395	335	HA	Friday, June 12, 2009	\$9.99	KFC	Claymont, DE	Yes	Fast Food	
396	336	HA	Sunday, June 14, 2009	\$185.40	Harry's Savoy Grill	Wilmington, DE	Yes	Restaurant	
397	337	KS	Monday, June 15, 2009	\$5.71	McDonald's	Concordville, PA	Yes	Fast Food	
398	338	HA	Monday, June 15, 2009	\$105.20	Pescatores Italian	Glen Mills, PA	Yes	Restaurant	
399	339	HA	Tuesday, June 16, 2009	\$29.84	Pescatores Italian	Glen Mills, PA	Yes	Restaurant	
400	340	HA	Wednesday, June 17, 2009	\$201.88	Millie High Steak & Seafood	Glen Mills, PA	Yes	Restaurant	
401	341	HA	Thursday, June 18, 2009	\$35.79	Exxon Mobil	Glen Mills, PA	Yes	Gas Station/Store	
402	342	HA	Thursday, June 18, 2009	\$52.42	Pescatores Italian	Mt. Laurel, NJ	Yes	Restaurant	
404	343	HA	Friday, June 19, 2009	\$3.08	Wendy's	Glen Mills, PA	Yes	Fast Food	
406	344	KS	Monday, June 22, 2009	\$119.41	Ganjarde Store - Grocery	Paramus, NJ	Yes	Grocery	
407	345	HA	Tuesday, June 23, 2009	\$6.99	Arby's	Glen Mills, PA	Yes	Fast Food	
408	346	HA	Tuesday, June 23, 2009	\$10.69	Boards	Philadelphia, PA	Yes	Merchandise	
412	347	KS	Tuesday, June 23, 2009	\$49.90	Sweeney's Bakery	Wilmington, DE	Yes	Restaurant	
415	348	LF	Wednesday, June 24, 2009	\$27.97	Walgreens (Happy Harry's)	Middletown, DE	Yes	Pharmacy	Changed Philadelphia, PA to Middletown, DE
416	349	HA	Thursday, June 25, 2009	\$37.40	7-Eleven	Santa Anna, CA	Yes	Gas Station/Store	
417	350	HA	Thursday, June 25, 2009	\$171.29	Il Fornello	Santa Monica, CA	Yes	Restaurant	
418	351	LF	Thursday, June 25, 2009	\$14.33	Sunoco	Odessa, DE	Yes	Gas Station/Store	Changed Odessa, FL to Odessa, DE
419	352	HA	Sunday, June 28, 2009	\$186.85	Harry's Savoy Grill	Wilmington, DE	Yes	Restaurant	
420	353	HA	Sunday, June 28, 2009	\$14.96	Ruby's Diner	Glen Mills, PA	Yes	Restaurant	
423	354	HA	Monday, June 29, 2009	\$46.16	Sunoco	Chadds Ford, PA	Yes	Gas Station/Store	
430	355	LF	Tuesday, June 30, 2009	\$59.65	Bertucci's	Glen Mills, PA	Yes	Restaurant	
431	356	HA	Tuesday, June 30, 2009	\$76.52	Campo De' Fiori	Media, PA	Yes	Restaurant	
434	357	HA	Wednesday, July 01, 2009	\$52.95	Pescatores Italian	Glen Mills, PA	Yes	Restaurant	
435	358	KS	Thursday, July 02, 2009	\$33.41	Ruby's Diner	Glen Mills, PA	Yes	Restaurant	
436	359	KS	Thursday, July 02, 2009	\$158.94	Verizon	Glen Mills, PA	Yes	Phone	
439	360	LF	Monday, July 13, 2009	\$27.87	Shell Oil	Wilmington, DE	Yes	Gas Station/Store	
440	361	KS	Tuesday, July 14, 2009	\$137.88	Cody's Original Roadhouse	Tarpon Springs, FL	Yes	Restaurant	
441	362	LF	Tuesday, July 14, 2009	\$32.00	Pat's Pizzeria	Glen Mills, PA	Yes	Restaurant	
442	363	KS	Tuesday, July 14, 2009	\$145.99	Publix	Holiday, FL	Yes	Grocery	
443	364	KS	Wednesday, July 15, 2009	\$33.50	Alfano's Restaurant	Cleawater, FL	Yes	Restaurant	Changed \$53.80 to \$33.50
447	365	LF	Friday, July 17, 2009	\$12.38	Wawa	Concordville, PA	Yes	Gas Station/Store	
448	366	KS	Saturday, July 18, 2009	\$90.00	Angelo's Pizza	Holiday, FL	Yes	Restaurant	
449	367	HA	Saturday, July 18, 2009	\$9.27	McDonald's	Holiday, FL	Yes	Fast Food	
450	368	HA	Saturday, July 18, 2009	\$19.43	McDonald's	Holiday, FL	Yes	Fast Food	
451	369	HA	Saturday, July 18, 2009	\$21.75	Rainbow 50's Diner	Holiday, FL	Yes	Restaurant	
453	370	HA	Sunday, July 19, 2009	\$50.48	Angelo's Pizza	Holiday, FL	Yes	Restaurant	
455	371	HA	Monday, July 20, 2009	\$24.02	Innisbrook	Palm Harbor, FL	Yes	Restaurant	
456	372	HA	Monday, July 20, 2009	\$25.90	Innisbrook	Palm Harbor, FL	Yes	Restaurant	
457	373	HA	Monday, July 20, 2009	\$37.03	Innisbrook	Palm Harbor, FL	Yes	Restaurant	
458	374	HA	Monday, July 20, 2009	\$64.96	Innisbrook	Palm Harbor, FL	Yes	Restaurant	

Original Number	Amended Number	Purchaser	Date	Amount	Vendor	Location	Fund (V/M)	Expense Type	Changes
459	375	HA	Monday, July 20, 2009	\$588.50	Innisbrook	Palm Harbor, FL	Yes	Restaurant	
460	376	HA	Monday, July 20, 2009	\$3.53	McDonald's	Holiday, FL	Yes	Fast Food	
461	377	LF	Monday, July 20, 2009	\$28.74	Pat's Pizzeria	Glen Mills, PA	Yes	Restaurant	
462	378	HA	Monday, July 20, 2009	\$132.04	Postitano Ristorante	Palm Harbor, FL	Yes	Restaurant	Changed Postitano to Postitano
463	379	HA	Tuesday, July 21, 2009	\$431.47	Avis Rent A Car	Tampa, FL	Yes	Rental Cars	
465	380	HA	Tuesday, July 21, 2009	\$21.08	Wawa	Chadds Ford, PA	Yes	Gas Station/Store	
466	381	HA	Wednesday, July 22, 2009	\$52.46	ACME	Glen Mills, PA	Yes	Grocery	
467	382	HA	Wednesday, July 22, 2009	\$56.58	Bertucci's	Glen Mills, PA	Yes	Restaurant	
468	383	HA	Thursday, July 23, 2009	\$16.87	Boston Market	Talleyville, DE	Yes	Restaurant	Changed Talleyville, DE
469	384	HA	Thursday, July 23, 2009	\$35.65	Pescatore's Italian	Glen Mills, PA	Yes	Restaurant	
470	385	HA	Friday, July 24, 2009	\$25.61	Friendly's Ice Cream	West Chester, PA	Yes	Restaurant	
471	386	HA	Monday, July 27, 2009	\$22.53	Pescatore's Italian	Glen Mills, PA	Yes	Restaurant	
472	387	HA	Monday, July 27, 2009	\$139.50	Sullivan's	Glen Mills, PA	Yes	Restaurant	
473	388	HA	Tuesday, July 28, 2009	\$28.18	Friendly's Ice Cream	West Chester, PA	Yes	Restaurant	
474	389	HA	Tuesday, July 28, 2009	\$35.42	Wawa	Chadds Ford, PA	Yes	Gas Station/Store	
475	390	HA	Wednesday, July 29, 2009	\$170.38	Mile High Steak & Seafood	Glen Mills, PA	Yes	Restaurant	
476	391	HA	Wednesday, July 29, 2009	\$8.00	Pat's Pizzeria	West Chester, PA	Yes	Restaurant	
477	392	LF	Wednesday, July 29, 2009	\$23.00	Pat's Pizzeria	Glen Mills, PA	Yes	Restaurant	
478	393	HA	Wednesday, July 29, 2009	\$243.58	Walgreens (Happy Harry's)	Phoenix, AZ	Yes	Pharmacy	Changed Phoenix, AZ to Westchester, PA
479	394	HA	Thursday, July 30, 2009	\$48.78	Pescatore's Italian	Glen Mills, PA	Yes	Restaurant	
480	395	LF	Friday, July 31, 2009	\$17.48	Applebees	Glen Mills, PA	Yes	Restaurant	
481	396	HA	Friday, July 31, 2009	\$341.45	Rosie O'Grady's	Middletown, DE	Yes	Restaurant	
482	397	HA	Saturday, August 01, 2009	\$26.03	Claridge House	New York, NY	Yes	Restaurant	
483	398	HA	Sunday, August 02, 2009	\$37.63	Exxon Mobil	New York, NY	Yes	Hotel	
484	399	HA	Monday, August 03, 2009	\$364.61	Joey's	Fort Lee, NJ	Yes	Gas Station/Store	
485	400	HA	Monday, August 03, 2009	\$126.62	Ruby Tuesday	Syracuse, NY	Yes	Restaurant	
489	401	HA	Tuesday, August 04, 2009	\$30.86	Nino's Pizza	East Syracuse, NY	Yes	Restaurant	
490	402	LF	Tuesday, August 04, 2009	\$26.67	Sunoco	Wilmington, DE	Yes	Restaurant	
491	403	LF	Wednesday, August 05, 2009	\$35.57	America Bar & Grill	Odesa, DE	Yes	Gas Station/Store	Changed Odesa, FL to Odesa, DE
492	404	LF	Wednesday, August 05, 2009	\$47.68	Giant Food	Glen Mills, PA	Yes	Restaurant	
494	405	HA	Thursday, August 06, 2009	\$170.37	Bertucci's	Middletown, DE	Yes	Grocery	
495	406	LF	Friday, August 07, 2009	\$500.00	Bon Appetit	Springfield, PA	Yes	Restaurant	
496	407	LF	Friday, August 07, 2009	\$1,000.00	Bon Appetit	Dunedin, FL	Yes	Restaurant	
497	408	HA	Friday, August 07, 2009	\$208.80	Mile High Steak & Seafood	Dunedin, FL	Yes	Restaurant	
498	409	LF	Friday, August 07, 2009	\$49.00	Pat's Pizzeria	Glen Mills, PA	Yes	Restaurant	
499	410	LF	Friday, August 07, 2009	\$85.26	Pizza hut	Glen Mills, PA	Yes	Restaurant	
500	411	HA	Friday, August 07, 2009	\$31.79	Verizon Wireless	Clearwater, FL	Yes	Restaurant	
501	412	LF	Friday, August 07, 2009	\$6.76	Wawa	Glen Mills, PA	Yes	Phone	
502	413	HA	Saturday, August 08, 2009	\$49.02	Sunoco	Concordville, PA	Yes	Gas Station/Store	
503	414	HA	Sunday, August 09, 2009	\$45.28	ACME	Boothwyn, PA	Yes	Gas Station/Store	
504	415	HA	Sunday, August 09, 2009	\$272.16	Target	Glen Mills, PA	Yes	Grocery	
505	416	HA	Monday, August 10, 2009	\$28.84	Pescatore's Italian	Berwyn, PA	Yes	Merchandise	
506	417	HA	Tuesday, August 11, 2009	\$7.41	Arby's	Glen Mills, PA	Yes	Restaurant	
507	418	LF	Wednesday, August 12, 2009	\$50.00	FINRA Education & Training	Marcus Hook, PA	Yes	Fast Food	
508	419	LF	Wednesday, August 12, 2009	\$30.94	Nino's Pizza	online	Yes	Other	
509	420	LF	Wednesday, August 12, 2009	\$29.96	Saladworks	West Chester, PA	Yes	Restaurant	
510	421	LF	Wednesday, August 12, 2009	\$70.80	Target	West Chester, PA	Yes	Fast Food	
511	422	HA	Wednesday, August 12, 2009	\$244.87	The York Grill	Berwyn, PA	Yes	Merchandise	
512	423	LF	Thursday, August 13, 2009	\$212.93	Holiday Florist	New York, NY	Yes	Flowers	
516	424	LF	Friday, August 14, 2009	\$30.07	Dunkin Donuts	Holiday, FL	Yes	Restaurant	
517	425	LF	Friday, August 14, 2009	\$37.07	Papa Johns	Chadds Ford, PA	Yes	Fast Food	
518	426	HA	Saturday, August 15, 2009	\$202.15	Harry's Savory Grill	Clearwater, FL	Yes	Restaurant	
519	427	KS	Saturday, August 15, 2009	\$314.92	Target	Wilmington, DE	Yes	Restaurant	Changed Denver, CO to Wilmington, DE
520	428	HA	Monday, August 17, 2009	\$694.27	Dilworthtown Inn	Wilmington, DE	Yes	Merchandise	
						West Chester, PA	Yes	Restaurant	

Original Number	Amended Number	Purchaser	Date	Amount	Vendor	Location	Fund (Y/N)	Expense Type	Changes
521	429	KS	Monday, August 17, 2009	\$83.25	Dilworthtown Inn	West Chester, PA	Yes	Restaurant	
522	430	HA	Monday, August 17, 2009	\$111.61	Pescatore's Italian	Glen Mills, PA	Yes	Restaurant	
524	431	KS	Tuesday, August 18, 2009	\$89.40	Harry's Savoy Grill	Wilmington, DE	Yes	Restaurant	
525	432	HA	Tuesday, August 18, 2009	\$40.89	Pescatore's Italian	Glen Mills, PA	Yes	Restaurant	
526	433	HA	Wednesday, August 19, 2009	\$35.54	Pescatore's Italian	Glen Mills, PA	Yes	Restaurant	
528	434	KS	Thursday, August 20, 2009	\$31.78	Dunkin Donuts	Concordville, PA	Yes	Fast Food	
529	435	KS	Thursday, August 20, 2009	\$16.71	Friendly's Ice Cream	West Chester, PA	Yes	Restaurant	
530	436	HA	Thursday, August 20, 2009	\$280.44	Rite Aid	Glen Mills, PA	Yes	Pharmacy	
531	437	HA	Thursday, August 20, 2009	\$46.39	Wawa	Concordville, PA	Yes	Gas Station/Store	
532	438	HA	Friday, August 21, 2009	\$78.85	Mexican Post	Wilmington, DE	Yes	Restaurant	
533	439	HA	Friday, August 21, 2009	\$54.03	Pescatore's Italian	Glen Mills, PA	Yes	Restaurant	
534	440	HA	Saturday, August 22, 2009	\$36.68	China Dragon	Boothwyn, PA	Yes	Restaurant	
535	441	KS	Sunday, August 23, 2009	\$132.43	Cody's Original Roadhouse	Tarpon Springs, FL	Yes	Restaurant	
537	442	HA	Sunday, August 23, 2009	\$9.64	Paradise	Philadelphia, PA	Yes	Merchandise	
538	443	HA	Sunday, August 23, 2009	\$27.80	Paradise	Philadelphia, PA	Yes	Merchandise	
539	444	HA	Sunday, August 23, 2009	\$20.22	Wawa	Chadds Ford, PA	Yes	Gas Station/Store	
545	445	HA	Tuesday, August 25, 2009	\$35.28	CVS	Holiday, FL	Yes	Pharmacy	
548	446	LF	Tuesday, August 25, 2009	\$69.13	Rockhurst University	online	Yes	Other	
549	447	LF	Tuesday, August 25, 2009	\$32.43	Walgreens	Clearwater, FL	Yes	Pharmacy	
550	448	LF	Wednesday, August 26, 2009	\$217.31	Alfonso's Restaurant	Clearwater, FL	Yes	Restaurant	
551	449	KS	Wednesday, August 26, 2009	\$197.95	Angelo's Pizza	Holiday, FL	Yes	Restaurant	
552	450	HA	Wednesday, August 26, 2009	\$342.06	Casulodvico	Palm Harbor, FL	Yes	Restaurant	
553	451	LF	Wednesday, August 26, 2009	\$25.00	FINRA Education & Training	online	Yes	Other	
554	452	LF	Wednesday, August 26, 2009	\$187.19	Palin Pavilion	Clearwater, FL	Yes	Restaurant	
555	453	LF	Thursday, August 27, 2009	\$55.08	Bon Appetit	Dunedin, FL	Yes	Restaurant	
558	454	LF	Friday, August 28, 2009	\$414.97	1-800-Flowers.com	online	Yes	Flowers	
559	455	HA	Friday, August 28, 2009	\$17.87	Angelo's Pizza	Holiday, FL	Yes	Restaurant	
560	456	HA	Friday, August 28, 2009	\$32.00	Chevron Edgewater	Clearwater, FL	Yes	Gas Station/Store	
561	457	HA	Friday, August 28, 2009	\$37.78	CVS	Holiday, FL	Yes	Pharmacy	
562	458	LF	Friday, August 28, 2009	\$33.77	Mugs on Missouri	Clearwater, FL	Yes	Restaurant	
566	459	KS	Saturday, August 29, 2009	\$40.00	Angelo's Pizza	Holiday, FL	Yes	Restaurant	
567	460	HA	Saturday, August 29, 2009	\$9.49	Burger King	Holiday, FL	Yes	Fast Food	
568	461	HA	Saturday, August 29, 2009	\$144.13	Holiday Cleaners	Holiday, FL	Yes	Dry Cleaner	
569	462	HA	Saturday, August 29, 2009	\$12.78	Home Depot	Holiday, FL	Yes	Home Improvement	
570	463	HA	Saturday, August 29, 2009	\$230.00	Home Depot	Holiday, FL	Yes	Home Improvement	
571	464	HA	Saturday, August 29, 2009	\$37.18	Publix	Holiday, FL	Yes	Grocery	
572	465	KS	Saturday, August 29, 2009	\$34.76	Sweetbay	Holiday, FL	Yes	Grocery	
573	466	HA	Saturday, August 29, 2009	\$42.77	Sweetbay	Holiday, FL	Yes	Grocery	
574	467	LF	Saturday, August 29, 2009	\$17.75	Walgreens	Clearwater, FL	Yes	Pharmacy	
575	468	HA	Sunday, August 30, 2009	\$56.89	7-Eleven	Port Richey, FL	Yes	Gas Station/Store	
576	469	HA	Sunday, August 30, 2009	\$701.09	Avis Rent A Car	Tampa, FL	Yes	Rental Cars	
577	470	LF	Sunday, August 30, 2009	\$7.48	Boston Market	Clearwater, FL	Yes	Restaurant	
578	471	LF	Sunday, August 30, 2009	\$5.53	Moe's	Clearwater, FL	Yes	Fast Food	
579	472	HA	Sunday, August 30, 2009	\$99.46	New Conn TPA	Tampa, FL	Yes	Merchandise	
580	473	LF	Monday, August 31, 2009	\$22.86	Publix	Clearwater, FL	Yes	Grocery	
582	474	LF	Tuesday, September 01, 2009	\$60.65	Rumba Island Bar	Clearwater, FL	Yes	Restaurant	
583	475	HA	Wednesday, September 02, 2009	\$459.59	Bellagio - Le Cirque	Las Vegas, NV	Yes	Restaurant	
584	476	LF	Wednesday, September 02, 2009	\$20.47	KFC	Middletown, DE	Yes	Fast Food	
585	477	LF	Thursday, September 03, 2009	\$45.00	FINRA Education & Training	online	Yes	Other	
588	478	LF	Friday, September 04, 2009	\$41.00	Pat's Pizzeria	Glen Mills, PA	Yes	Restaurant	
589	479	HA	Saturday, September 05, 2009	\$19.49	KFC	Claymont, DE	Yes	Fast Food	
590	480	HA	Sunday, September 06, 2009	\$70.80	ACME	Glen Mills, PA	Yes	Grocery	
591	481	LF	Tuesday, September 08, 2009	\$230.03	1-800-Flowers.com	online	Yes	Flowers	
592	482	KS	Thursday, September 10, 2009	\$68.11	Fiorello's Cafe	West Chester, PA	Yes	Restaurant	

Original Number	Amended Number	Purchaser	Date	Amount	Vendor	Location	Fund (Y/N)	Expense Type	Changes
593	483	HA	Thursday, September 10, 2009	\$45.41	Lukeoil	Mt. Laurel, NJ	Yes	Gas Station/Store	
594	484	HA	Friday, September 11, 2009	\$4.72	McDonald's	Concordville, PA	Yes	Fast Food	
596	485	HA	Saturday, September 12, 2009	\$209.99	Best Buy	Wilmington, DE	Yes	Merchandise	
597	486	HA	Saturday, September 12, 2009	\$385.15	Garnet Cleaners	Boothwyn, PA	Yes	Dry Cleaner	
598	487	HA	Sunday, September 13, 2009	\$39.30	Jim's Service Center	Bellmawr, PA	Yes	Auto	
599	488	HA	Sunday, September 13, 2009	\$220.17	Morton's	Atlantic City, NJ	Yes	Restaurant	
603	489	HA	Tuesday, September 15, 2009	\$125.97	Safeway Store (Grocery)	Wilmington, DE	Yes	Grocery	
604	490	HA	Wednesday, September 16, 2009	\$7.19	Arbys	West Chester, PA	Yes	Fast Food	
605	491	HA	Thursday, September 17, 2009	\$5.78	McDonald's	Concordville, PA	Yes	Fast Food	
608	492	HA	Friday, September 18, 2009	\$70.13	Pescabores Italian	Glen Mills, PA	Yes	Restaurant	
609	493	HA	Monday, September 21, 2009	\$61.40	Harry's Savory Grill	Wilmington, DE	Yes	Restaurant	
610	494	HA	Monday, September 21, 2009	\$5.78	McDonald's	Concordville, PA	Yes	Fast Food	
611	495	HA	Monday, September 21, 2009	\$43.74	Wawa	Chadds Ford, PA	Yes	Gas Station/Store	
612	496	HA	Tuesday, September 22, 2009	\$60.18	Marriott	Philadelphia, PA	Yes	Hotel	
613	497	KS	Tuesday, September 22, 2009	\$80.34	Sweetbay	Holiday, FL	Yes	Grocery	
614	498	LF	Wednesday, September 23, 2009	\$5.95	Au Bon Pain	Philadelphia, PA	Yes	Fast Food	
615	499	KS	Wednesday, September 23, 2009	\$67.48	Island Way Grill	Clearwater, FL	Yes	Restaurant	
616	500	LF	Wednesday, September 23, 2009	\$13.06	Paradies	Philadelphia, PA	Yes	Merchandise	
617	501	HA	Wednesday, September 23, 2009	\$9.71	Wawa	Chadds Ford, PA	Yes	Gas Station/Store	
618	502	KS	Thursday, September 24, 2009	\$11.23	Cody's Original Roadhouse	Tarpon Springs, FL	Yes	Restaurant	This is marked as an error on RX-8 page 1 but it is correct.
619	503	KS	Thursday, September 24, 2009	\$66.49	Cody's Original Roadhouse	Tarpon Springs, FL	Yes	Restaurant	
620	504	HA	Thursday, September 24, 2009	\$12.99	KFC	Claymont, DE	Yes	Fast Food	
621	505	LF	Thursday, September 24, 2009	\$60.13	Pickels Plus Too	Clearwater, FL	Yes	Restaurant	
622	506	LF	Friday, September 25, 2009	\$10.57	Flat Bread	Tampa, FL	Yes	Fast Food	
623	507	LF	Friday, September 25, 2009	\$7.32	Giant Oil	Clearwater, FL	Yes	Gas Station/Store	
624	508	HA	Friday, September 25, 2009	\$11.86	Wawa	Chadds Ford, PA	Yes	Gas Station/Store	
625	509	KS	Saturday, September 26, 2009	\$74.36	Cody's Original Roadhouse	Tarpon Springs, FL	Yes	Restaurant	
626	510	HA	Sunday, September 27, 2009	\$5.28	McDonald's	West Chester, PA	Yes	Fast Food	
627	511	HA	Sunday, September 27, 2009	\$47.98	Squires Pantry	Boothwyn, PA	Yes	Gas Station/Store	
628	512	HA	Tuesday, September 29, 2009	\$23.05	CVS	Glen Mills, PA	Yes	Pharmacy	
629	513	HA	Tuesday, September 29, 2009	\$23.48	Zoup	Glen Mills, PA	Yes	Restaurant	
630	514	HA	Wednesday, September 30, 2009	\$6.78	Arby's	West Chester, PA	Yes	Fast Food	
631	515	HA	Thursday, October 01, 2009	\$44.86	Paradies	Philadelphia, PA	Yes	Merchandise	
632	516	HA	Thursday, October 01, 2009	\$32.31	Philadelphia's Famous Restaurant	Philadelphia, PA	Yes	Restaurant	
641	517	LF	Tuesday, October 06, 2009	\$4.99	McDonald's	Concordville, PA	Yes	Fast Food	
642	518	LF	Tuesday, October 06, 2009	\$62.98	Pat's Pizzeria	Glen Mills, PA	Yes	Restaurant	
644	519	LF	Tuesday, October 06, 2009	\$295.68	Sandpearl Resort	Clearwater Beach, FL	Yes	Hotel	
645	520	LF	Wednesday, October 07, 2009	\$118.90	Bed Bath & Beyond	Wilmington, DE	Yes	Merchandise	
646	521	LF	Thursday, October 08, 2009	\$36.05	Pat's Pizzeria	Glen Mills, PA	Yes	Restaurant	
648	522	LF	Friday, October 09, 2009	\$16.25	Sunoco	Odessa, DE	Yes	Gas Station/Store	Changed Odessa, FL to Odessa, DE
649	523	KS	Saturday, October 10, 2009	\$211.53	CVS	Holiday, FL	Yes	Pharmacy	
650	524	HA	Saturday, October 10, 2009	\$19.79	KFC	Port Richey, FL	Yes	Fast Food	
651	525	HA	Saturday, October 10, 2009	\$162.54	Sweetbay	Holiday, FL	Yes	Grocery	
652	526	LF	Saturday, October 10, 2009	\$93.19	Wal-Mart	Middletown, DE	Yes	Merchandise	
653	527	HA	Sunday, October 11, 2009	\$145.91	Casaldovico	Palm Harbor, FL	Yes	Restaurant	
654	528	HA	Sunday, October 11, 2009	\$14.99	CVS	Holiday, FL	Yes	Pharmacy	
655	529	HA	Sunday, October 11, 2009	\$14.47	McDonald's	Holiday, FL	Yes	Fast Food	
656	530	KS	Sunday, October 11, 2009	\$333.98	Sweetbay	Holiday, FL	Yes	Grocery	
657	531	LF	Sunday, October 11, 2009	\$62.20	Wal-Mart	Middletown, DE	Yes	Merchandise	
658	532	HA	Monday, October 12, 2009	\$82.61	Chili's Grill	Tarpon Springs, FL	Yes	Restaurant	
659	533	KS	Monday, October 12, 2009	\$12.25	McDonald's	Holiday, FL	Yes	Fast Food	
660	534	HA	Tuesday, October 13, 2009	\$23.26	Angelo's Pizza	Holiday, FL	Yes	Restaurant	
661	535	HA	Tuesday, October 13, 2009	\$14.32	Super Gas	Palm Harbor, FL	Yes	Gas Station/Store	

Original Number	Amended Number	Purchaser	Date	Amount	Vendor	Location	Fund (Y/N)	Expense Type	Changes
662	536	LF	Wednesday, October 14, 2009	\$10.92	McDonald's	Concordville, PA	Yes	Fast Food	
663	537	KS	Wednesday, October 14, 2009	\$28.97	Okeefe's	Clearwater, FL	Yes	Gas Station/Store	
664	538	LF	Wednesday, October 14, 2009	\$24.54	Shell Oil	Wilmington, DE	Yes	Rental Cars	
665	539	HA	Thursday, October 15, 2009	\$3.00	Avis Rent A Car	Tampa, FL	Yes	Rental Cars	
666	540	HA	Thursday, October 15, 2009	\$566.97	Avis Rent A Car	Tampa, FL	Yes	Rental Cars	
668	541	KS	Thursday, October 15, 2009	\$31.35	Chill's Too	Tampa, FL	Yes	Restaurant	
672	542	HA	Friday, October 16, 2009	\$479.90	Saloon	Philadelphia, PA	Yes	Restaurant	
673	543	HA	Saturday, October 17, 2009	\$14.48	Paradise	Philadelphia, PA	Yes	Merchandise	
679	544	LF	Tuesday, October 20, 2009	\$46.14	Macaroni Grill	Wilmington, DE	Yes	Restaurant	
689	545	HA	Tuesday, October 27, 2009	\$23.59	Friendly's Ice Cream	West Chester, PA	Yes	Fast Food	
690	546	HA	Wednesday, October 28, 2009	\$7.84	McDonald's	Concordville, PA	Yes	Fast Food	
691	547	LF	Wednesday, October 28, 2009	\$26.17	Pat's Pizzeria	Glen Mills, PA	Yes	Restaurant	
692	548	HA	Thursday, October 29, 2009	\$92.63	Bistro Romano Restaurant	Philadelphia, PA	Yes	Restaurant	
693	549	KS	Saturday, October 31, 2009	\$76.00	Springfield Inn Restaurant	Springfield, PA	Yes	Restaurant	
694	550	LF	Monday, November 02, 2009	\$5.69	Burger King	Wilmington, DE	Yes	Fast Food	
695	551	HA	Monday, November 02, 2009	\$8.16	McDonald's	Concordville, PA	Yes	Fast Food	
696	552	HA	Tuesday, November 03, 2009	\$21.25	Arby's	West Chester, PA	Yes	Fast Food	
697	553	HA	Tuesday, November 03, 2009	\$195.50	Mile High Steak & Seafood	Glen Mills, PA	Yes	Restaurant	
698	554	LF	Tuesday, November 03, 2009	\$14.16	Sonoco	Odessa, DE	Yes	Gas Station/Store	Changed Odessa, DE to Odessa, DE
699	555	LF	Wednesday, November 04, 2009	\$65.33	Giant Food	Middletown, DE	Yes	Grocery	
700	556	HA	Wednesday, November 04, 2009	\$6.76	Home Depot	Glen Mills, PA	Yes	Home Improvement	Changed West Chester, PA to Glen Mills, PA
701	557	HA	Wednesday, November 04, 2009	\$14.43	TEI Fridays	Philadelphia, PA	Yes	Restaurant	Changed Philadelphia, PA to West Chester, PA
702	558	HA	Wednesday, November 04, 2009	\$67.87	Wagners (Naggy Harry's on Annex)	West Chester, PA	Yes	Pharmacy	Added West Chester, PA as location
703	559	HA	Thursday, November 05, 2009	\$6.04	Burger King	Kennett Square, PA	Yes	Fast Food	
704	560	KS	Thursday, November 05, 2009	\$109.52	Maggiolo's	Dallas, TX	Yes	Restaurant	
705	561	LF	Thursday, November 05, 2009	\$3.77	McDonald's	Concordville, PA	Yes	Fast Food	
706	562	HA	Thursday, November 05, 2009	\$4.34	McDonald's	Concordville, PA	Yes	Fast Food	
707	563	HA	Thursday, November 05, 2009	\$49.29	Sunoco	Chadds Ford, PA	Yes	Gas Station/Store	
708	564	HA	Friday, November 06, 2009	\$13.93	TGI Fridays	West Chester, PA	Yes	Restaurant	
709	565	LF	Friday, November 06, 2009	\$13.25	Wawa	Newark, DE	Yes	Gas Station/Store	Changed Newark, NJ to Newark, DE
710	566	HA	Saturday, November 07, 2009	\$92.40	Cody's Original Roadhouse	Tarpon Springs, FL	Yes	Restaurant	
711	567	HA	Saturday, November 07, 2009	\$8.96	Marriott	Tampa, FL	Yes	Hotel	
712	568	HA	Saturday, November 07, 2009	\$7.02	Wawa	Boothwyn, PA	Yes	Gas Station/Store	
713	569	LF	Sunday, November 08, 2009	\$16.22	ACME	Middletown, DE	Yes	Grocery	
714	570	HA	Sunday, November 08, 2009	\$994.88	Sears Roebuck	Clearwater, FL	Yes	Merchandise	
715	571	HA	Sunday, November 08, 2009	\$346.68	Things Remembered	Clearwater, FL	Yes	Merchandise	
716	572	HA	Sunday, November 08, 2009	\$413.60	Vincenzo's	Port Richey, FL	Yes	Restaurant	
717	573	LF	Monday, November 09, 2009	\$150.00	Dillworthtown Inn	West Chester, PA	Yes	Restaurant	
718	574	LF	Monday, November 09, 2009	\$19.65	Pickles Plus Too	Clearwater, FL	Yes	Restaurant	
721	575	HA	Tuesday, November 10, 2009	\$6.07	Burger King	Holiday, FL	Yes	Fast Food	
722	576	LF	Tuesday, November 10, 2009	\$27.90	Okeefe's	Clearwater, FL	Yes	Restaurant	
723	577	LF	Wednesday, November 11, 2009	\$130.45	Island Way Grill	Clearwater, FL	Yes	Restaurant	
725	578	LF	Wednesday, November 11, 2009	\$217.00	Pickles Plus Too	Clearwater, FL	Yes	Restaurant	
726	579	KS	Thursday, November 12, 2009	\$1,977.36	Bayshore Trophies	Clearwater, FL	Yes	Merchandise	
727	580	LF	Thursday, November 12, 2009	\$58.15	Bonefish	Clearwater, FL	Yes	Restaurant	
728	581	KS	Thursday, November 12, 2009	\$99.46	Chill's	New Port Richie, FL	Yes	Restaurant	
729	582	HA	Thursday, November 12, 2009	\$44.56	Holiday Citgo	Holiday, FL	Yes	Gas Station/Store	
730	583	HA	Thursday, November 12, 2009	\$134.39	Holiday Cleaners	Pittsburgh, PA	Yes	Dry Cleaner	Changed Pittsburgh, PA to Holiday, FL
731	584	LF	Thursday, November 12, 2009	\$143.93	Pickles Plus Too	Clearwater, FL	Yes	Restaurant	
732	585	HA	Friday, November 13, 2009	\$29.95	Airside F Gifts	Tampa, FL	Yes	Merchandise	
733	586	KS	Friday, November 13, 2009	\$31.48	Airside F Gifts	Tampa, FL	Yes	Merchandise	
734	587	HA	Friday, November 13, 2009	\$678.16	Avis Rent A Car	Tampa, FL	Yes	Rental Cars	
735	588	HA	Friday, November 13, 2009	\$7.98	McDonald's	Holiday, FL	Yes	Fast Food	
736	589	LF	Friday, November 13, 2009	\$26.74	Nathan Accessories	Tampa, FL	Yes	Merchandise	

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737	580	HA	Friday, November 13, 2009	\$21.13	Wawa	West Chester, PA	Yes	Gas Station/Store	Changed West Chester, PA to Chadds Ford, PA
738	591	HA	Saturday, November 14, 2009	\$622.73	The Prime Rib	San Mateo, CA	Yes	Restaurant	Changed San Mateo, CA to Philadelphia, PA
739	582	HA	Saturday, November 14, 2009	\$80.77	Walgreens (Happy-Harry's)	Philadelphia, PA	Yes	Pharmacy	Changed Philadelphia, PA to West Chester, PA
740	593	HA	Sunday, November 15, 2009	\$3.81	Arby's	Marcus Hook, PA	Yes	Fast Food	
746	594	HA	Monday, November 16, 2009	\$12.09	Wawa	Chadds Ford, PA	Yes	Gas Station/Store	
748	595	LF	Tuesday, November 17, 2009	\$28.58	Cumberland Farms	Wilmington, DE	Yes	Gas Station/Store	
749	596	LF	Tuesday, November 17, 2009	\$54.34	TGI Fridays	West Chester, PA	Yes	Restaurant	
750	597	HA	Tuesday, November 17, 2009	\$14.43	TGI Fridays	West Chester, PA	Yes	Restaurant	
751	598	KS	Wednesday, November 18, 2009	\$625.63	Avis Rent a Car	San Francisco, CA	Yes	Rental Cars	
752	599	HA	Wednesday, November 18, 2009	\$186.95	Harry's Savory Grill	Wilmington, DE	Yes	Restaurant	
758	600	LF	Thursday, November 19, 2009	\$59.24	1-800-flowers.com	online	Yes	Flowers	
759	601	KS	Monday, November 23, 2009	\$288.29	CVS	Glen Mills, PA	Yes	Pharmacy	
760	602	LF	Tuesday, November 24, 2009	\$44.86	Pat's Pizzeria	Glen Mills, PA	Yes	Restaurant	
761	603	LF	Wednesday, November 25, 2009	\$204.96	Famous Dave's BBQ	Wilmington, DE	Yes	Restaurant	
763	604	KS	Friday, November 27, 2009	\$57.67	Maggiore's	King of Prussia, PA	Yes	Restaurant	
764	605	KS	Monday, November 30, 2009	\$5.23	CVS	Glen Mills, PA	Yes	Pharmacy	
768	606	KS	Tuesday, December 01, 2009	\$42.00	Pescatores Italian	Glen Mills, PA	Yes	Restaurant	
769	607	KS	Wednesday, December 02, 2009	\$561.09	Pescatores Italian	Glen Mills, PA	Yes	Restaurant	
771	608	LF	Thursday, December 03, 2009	\$49.62	Pat's Pizzeria	Glen Mills, PA	Yes	Restaurant	
772	609	KS	Friday, December 04, 2009	\$13.70	CVS	Glen Mills, PA	Yes	Pharmacy	
773	610	LF	Friday, December 04, 2009	\$9.17	McDonald's	Concordville, PA	Yes	Fast Food	
774	611	KS	Friday, December 04, 2009	\$54.01	Pescatores Italian	Glen Mills, PA	Yes	Restaurant	
775	612	LF	Friday, December 04, 2009	\$159.00	Richardson's Floral	Glen Mills, PA	Yes	Flowers	
777	613	KS	Sunday, December 06, 2009	\$113.96	Nino's Pizza	Wilmington, DE	Yes	Restaurant	
779	614	LF	Monday, December 07, 2009	\$2,054.63	Bon Appetit	Dunedin, FL	Yes	Restaurant	
780	615	LF	Monday, December 07, 2009	\$6.98	Hardies	Middletown, DE	Yes	Fast Food	
781	616	HA	Monday, December 07, 2009	\$103.88	Publix	Clearwater, FL	Yes	Grocery	
782	617	HA	Monday, December 07, 2009	\$7.65	Sbarro	Philadelphia, PA	Yes	Fast Food	
783	618	HA	Monday, December 07, 2009	\$28.50	Smiley Bones	Clearwater, FL	Yes	Restaurant	
785	619	LF	Tuesday, December 08, 2009	\$272.85	Karlas	Clearwater, FL	Yes	Flowers	
786	620	LF	Tuesday, December 08, 2009	\$116.64	Pickles Plus Too	Clearwater, FL	Yes	Restaurant	
787	621	LF	Tuesday, December 08, 2009	\$69.08	Walgreens	Clearwater, FL	Yes	Pharmacy	
788	622	HA	Wednesday, December 09, 2009	\$270.70	Casaldovico	Palm Harbor, FL	Yes	Restaurant	
789	623	LF	Wednesday, December 09, 2009	\$108.60	Island Way Grill	Clearwater, FL	Yes	Restaurant	
790	624	HA	Thursday, December 10, 2009	\$5,624.02	Alfonso Restaurant	Clearwater, FL	Yes	Restaurant	
792	625	LF	Thursday, December 10, 2009	\$250.41	Pickles Plus Too	Clearwater, FL	Yes	Restaurant	
793	626	HA	Thursday, December 10, 2009	\$18.60	Pickles Plus Too	Clearwater, FL	Yes	Restaurant	
795	627	LF	Friday, December 11, 2009	\$21.57	Sam Sneads A	Tampa, FL	Yes	Restaurant	
796	628	LF	Friday, December 11, 2009	\$31.93	Tilted Kilt	Clearwater, FL	Yes	Restaurant	
797	629	KS	Saturday, December 12, 2009	\$35.70	Beachcomber Restaurant	Palm Beach, FL	Yes	Rental Cars	
798	630	HA	Saturday, December 12, 2009	\$48.35	KFC	Port Richey, FL	Yes	Fast Food	
799	631	HA	Saturday, December 12, 2009	\$48.70	Sunoco	Indian Rocks, FL	Yes	Gas Station/Store	
800	632	KS	Saturday, December 12, 2009	\$85.04	Sweetbay	Holiday, FL	Yes	Grocery	
801	633	LF	Saturday, December 12, 2009	\$83.00	The office	Lafayette, LA	Yes	Restaurant	
802	634	HA	Saturday, December 12, 2009	\$246.37	Villa Gallace	Indian Rocks, FL	Yes	Restaurant	
803	635	HA	Sunday, December 13, 2009	\$62.32	Angelo's Pizza	Holiday, FL	Yes	Restaurant	
804	636	KS	Sunday, December 13, 2009	\$432.51	Bed Bath & Beyond	Clearwater, FL	Yes	Merchandise	
805	637	HA	Sunday, December 13, 2009	\$27.85	Home Depot	Holiday, FL	Yes	Home Improvement	
806	638	HA	Monday, December 14, 2009	\$33.85	Angelo's Pizza	Holiday, FL	Yes	Restaurant	
808	639	HA	Monday, December 14, 2009	\$53.16	Pickles Plus Too	Clearwater, FL	Yes	Restaurant	
809	640	HA	Tuesday, December 15, 2009	\$38.80	Airside F Gifts	Tampa, FL	Yes	Merchandise	
811	641	HA	Tuesday, December 15, 2009	\$665.66	Avis Rent A Car	Tampa, FL	Yes	Rental Cars	
812	642	LF	Tuesday, December 15, 2009	\$7.31	Chick-Fil-A	Glen Mills, PA	Yes	Fast Food	
812	643	KS	Tuesday, December 15, 2009	\$35.88	Chili's Too	Tampa, FL	Yes	Restaurant	

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815	644	LF	Tuesday, December 15, 2009	\$147.28	Target	Berwyn, PA	Yes	Merchandise	
816	645	HA	Wednesday, December 16, 2009	\$56.36	Pescatores Italian	Glen Mills, PA	Yes	Restaurant	
817	646	HA	Thursday, December 17, 2009	\$20.52	Wawa	Chadds Ford, PA	Yes	Gas Station/Store	
819	647	KS	Friday, December 18, 2009	\$31.79	Verizon	Glen Mills, PA	Yes	Phone	
820	648	HA	Friday, December 18, 2009	\$41.50	Wawa	Chadds Ford, PA	Yes	Gas Station/Store	
821	649	LF	Monday, December 21, 2009	\$40.44	Pats Pizzeria	Glen Mills, PA	Yes	Restaurant	
822	650	KS	Tuesday, December 22, 2009	\$40.77	Bistro on the Brandy	Chadds Ford, PA	Yes	Restaurant	
823	651	LF	Tuesday, December 22, 2009	\$35.62	California Tortilla	Glen Mills, PA	Yes	Restaurant	
824	652	HA	Tuesday, December 22, 2009	\$28.36	Friendly's Ice Cream	Glen Mills, PA	Yes	Restaurant	
825	653	HA	Tuesday, December 22, 2009	\$45.33	Wawa	Chadds Ford, PA	Yes	Gas Station/Store	
826	654	LF	Wednesday, December 23, 2009	\$184.60	Famous Dave's 88Q	Springfield, PA	Yes	Restaurant	
827	655	KS	Wednesday, December 23, 2009	\$149.25	Sweeney's Bakery	Wilmington, DE	Yes	Restaurant	
828	656	KS	Wednesday, December 23, 2009	\$88.51	Wawa	Chadds Ford, PA	Yes	Gas Station/Store	
829	657	KS	Wednesday, December 23, 2009	\$15.19	Wawa	Chadds Ford, PA	Yes	Gas Station/Store	
830	658	KS	Thursday, December 24, 2009	\$302.93	ACME	Wilmington, DE	Yes	Grocery	
831	659	HA	Thursday, December 24, 2009	\$4.03	McDonald's	West Chester, PA	Yes	Fast Food	Changed Boothwyn, PA to West Chester, PA
832	660	HA	Sunday, December 27, 2009	\$41.74	Squires Pantry	Boothwyn, PA	Yes	Gas Station/Store	
833	661	LF	Sunday, December 27, 2009	\$26.03	Wawa	Middletown, DE	Yes	Gas Station/Store	
834	662	HA	Monday, December 28, 2009	\$826.08	Broadway Loes	New York, NY	Yes	Restaurant	
835	663	HA	Monday, December 28, 2009	\$43.07	China Dragon	Boothwyn, PA	Yes	Restaurant	
837	664	HA	Tuesday, December 29, 2009	\$44.16	Pescatores Italian	Glen Mills, PA	Yes	Restaurant	
838	665	LF	Monday, December 28, 2009	\$80.47	Walgreens (Happy Harry's)	Philadelphia, PA	Yes	Pharmacy	Changed 12/29/2009 to 12/28/2009
839	666	HA	Wednesday, December 30, 2009	\$116.41	Blue Pear Bistro	West Chester, PA	Yes	Restaurant	
840	667	LF	Wednesday, December 30, 2009	\$22.80	Pats Pizzeria	Glen Mills, PA	Yes	Restaurant	
841	668	HA	Wednesday, December 30, 2009	\$69.46	Pescatores Italian	Glen Mills, PA	Yes	Restaurant	
842	669	KS	Thursday, December 31, 2009	\$25.77	Friendly's Ice Cream	West Chester, PA	Yes	Restaurant	
843	670	HA	Thursday, December 31, 2009	\$98.92	Nino's Pizza	Wilmington, DE	Yes	Restaurant	
844	671	HA	Friday, January 01, 2010	\$49.16	Pappas Restaurant	Boothwyn, PA	Yes	Restaurant	
845	672	HA	Saturday, January 02, 2010	\$63.95	Mexican Post	Wilmington, DE	Yes	Restaurant	
846	673	HA	Sunday, January 03, 2010	\$305.95	Sullivans	Wilmington, DE	Yes	Restaurant	
847	674	KS	Monday, January 04, 2010	\$19.19	Delco's Original (food)	Chadds Ford, PA	Yes	Restaurant	
848	675	HA	Monday, January 04, 2010	\$30.13	Dunkin Donuts	Concordville, PA	Yes	Restaurant	
849	676	LF	Monday, January 04, 2010	\$46.51	Genjardo's Store - Grocery	Glen Mills, PA	Yes	Fast Food	
850	677	HA	Monday, January 04, 2010	\$110.56	Ruby's Diner	Glen Mills, PA	Yes	Grocery	
851	678	LF	Monday, January 04, 2010	\$28.82	Sonoco	Odessa, DE	Yes	Restaurant	Changed Odessa, FL to Odessa, DE
853	679	HA	Tuesday, January 05, 2010	\$26.92	Pescatores Italian	Glen Mills, PA	Yes	Restaurant	
856	680	HA	Thursday, January 07, 2010	\$9.43	Dunkin Donuts	Chadds Ford, PA	Yes	Fast Food	
857	681	HA	Thursday, January 07, 2010	\$50.40	Mckenzie Brew House	Glen Mills, PA	Yes	Restaurant	
858	682	HA	Friday, January 08, 2010	\$185.01	Home Depot	Glen Mills, PA	Yes	Home Improvement	
859	683	HA	Friday, January 08, 2010	\$33.99	KFC	Claymont, DE	Yes	Fast Food	
860	684	HA	Friday, January 08, 2010	\$3.82	McDonald's	Concordville, PA	Yes	Fast Food	
861	685	HA	Friday, January 08, 2010	\$24.86	Pescatores Italian	Glen Mills, PA	Yes	Restaurant	
862	686	HA	Saturday, January 09, 2010	\$36.45	Exxon Mobil	Mt. Laurel, NJ	Yes	Gas Station/Store	
863	687	HA	Saturday, January 09, 2010	\$253.88	Sullivans	Wilmington, DE	Yes	Restaurant	
864	688	HA	Sunday, January 10, 2010	\$64.97	CVS	Glen Mills, PA	Yes	Pharmacy	
865	689	KS	Monday, January 11, 2010	\$54.22	Pescatores Italian	Glen Mills, PA	Yes	Restaurant	
866	690	LF	Monday, January 11, 2010	\$30.00	Wawa	Glen Mills, PA	Yes	Gas Station/Store	Added West Chester, PA as location
867	691	LF	Tuesday, January 12, 2010	\$928.00	American Airlines (Ticket for Sue Daley)	West Chester, PA	Yes	Gas Station/Store	
868	692	LF	Tuesday, January 12, 2010	\$402.19	Hawaiian Airlines (Ticket for Peter Daley)	Dallas, TX	Yes	Air	
870	693	LF	Tuesday, January 12, 2010	\$143.93	Pickles Plus Too	Honolulu, HI	Yes	Air	
871	694	LF	Wednesday, January 13, 2010	\$128.99	Bebe Stores	Cleawater, FL	Yes	Restaurant	
872	695	HA	Wednesday, January 13, 2010	\$39.12	CIBO Bistro Wine	Newark, DE	Yes	Merchandise	Changed Newark, NJ to Newark, DE
873	696	HA	Wednesday, January 13, 2010	\$30.23	Paradies	Philadelphia, PA	Yes	Merchandise	
874	697	KS	Wednesday, January 13, 2010	\$19.11	Paradies	Philadelphia, PA	Yes	Merchandise	

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875	698	HA	Wednesday, January 13, 2010	\$165.44	Sweetbay	Holiday, FL	Yes	Grocery	
876	699	HA	Thursday, January 14, 2010	\$89.48	Alfano's Restaurant	Clearwater, FL	Yes	Restaurant	Changed Holiday, FL to Clearwater, FL
877	700	HA	Thursday, January 14, 2010	\$18.21	Angelo's Pizza	Holiday, FL	Yes	Restaurant	
878	701	LF	Thursday, January 14, 2010	\$226.79	Ann Taylor	Newark, DE	Yes	Merchandise	Changed Newark, NJ to Newark, DE
879	702	LF	Thursday, January 14, 2010	\$7.67	McDonald's	Holiday, FL	Yes	Fast Food	
882	703	LF	Thursday, January 14, 2010	\$13.06	Sharro	Newark, DE	Yes	Fast Food	Changed Newark, NJ to Newark, DE
883	704	HA	Friday, January 15, 2010	\$9.71	Checkers	Clearwater, FL	Yes	Fast Food	
884	705	HA	Friday, January 15, 2010	\$1.07	Checkers	Clearwater, FL	Yes	Fast Food	
885	706	KS	Friday, January 15, 2010	\$47.01	Doc Ford's Restaurant	Sanibel, FL	Yes	Restaurant	
886	707	HA	Friday, January 15, 2010	\$7.67	McDonald's	Holiday, FL	Yes	Fast Food	
887	708	HA	Saturday, January 16, 2010	\$183.32	The Bubble Room	Captiva, FL	Yes	Restaurant	
888	709	LF	Sunday, January 17, 2010	\$32.39	APW Philly	Philadelphia, PA	Yes	Restaurant	
889	710	HA	Sunday, January 17, 2010	\$51.86	Hess	Sanibel Island, FL	Yes	Gas Station/Store	
890	711	LF	Sunday, January 17, 2010	\$179.06	Island Way Grill	Clearwater, FL	Yes	Restaurant	
891	712	LF	Sunday, January 17, 2010	\$8.94	Paradise	Philadelphia, PA	Yes	Merchandise	
892	713	KS	Sunday, January 17, 2010	\$404.42	South Seas Resort	Captiva Island, FL	Yes	Hotel	
893	714	KS	Monday, January 18, 2010	\$23.45	DD/BR	Palm Harbor, FL	Yes	Fast Food	
894	715	HA	Monday, January 18, 2010	\$5.11	McDonald's	Holiday, FL	Yes	Fast Food	
896	716	LF	Monday, January 18, 2010	\$8.16	Starbucks	Clearwater, FL	Yes	Fast Food	
898	717	LF	Monday, January 18, 2010	\$242.72	Tuscany Grille	Clearwater, FL	Yes	Restaurant	
899	718	LF	Tuesday, January 19, 2010	\$30.26	Los Mayas	Clearwater, FL	Yes	Restaurant	
900	719	LF	Tuesday, January 19, 2010	\$82.28	Publik	Clearwater, FL	Yes	Grocery	
902	720	KS	Wednesday, January 20, 2010	\$160.98	Helman's Restaurant	Clearwater, FL	Yes	Restaurant	
903	721	HA	Wednesday, January 20, 2010	\$5.11	McDonald's	Holiday, FL	Yes	Fast Food	
904	722	LF	Thursday, January 21, 2010	\$35.90	Alfano's Restaurant	Clearwater, FL	Yes	Restaurant	
905	723	LF	Thursday, January 21, 2010	\$150.00	FINRA Education & Training	online	Yes	Other	
906	724	HA	Thursday, January 21, 2010	\$8.31	McDonald's	Holiday, FL	Yes	Fast Food	
909	725	LF	Thursday, January 21, 2010	\$5.34	McDonald's	Clearwater, FL	Yes	Fast Food	Changed 1/22/10 to 1/23/10
910	726	HA	Friday, January 22, 2010	\$8.31	McDonald's	Holiday, FL	Yes	Fast Food	
912	727	HA	Friday, January 22, 2010	\$43.53	Sirata Beach Resort	St. Petersburg, FL	Yes	Hotel	
913	728	HA	Saturday, January 23, 2010	\$25.67	Denny's	Largo, FL	Yes	Restaurant	
916	729	LF	Saturday, January 23, 2010	\$228.73	Successories	Boca Raton, FL	Yes	Merchandise	
917	730	KS	Saturday, January 23, 2010	\$366.67	Target	New Port Richey, FL	Yes	Merchandise	
918	731	HA	Saturday, January 23, 2010	\$13.12	The Compass Grill	St. Petersburg, FL	Yes	Restaurant	
919	732	KS	Sunday, January 24, 2010	\$78.00	Blue Martini	Tampa, FL	Yes	Restaurant	
920	733	KS	Sunday, January 24, 2010	\$223.02	Maggiore's	Tampa, FL	Yes	Restaurant	
922	734	HA	Monday, January 25, 2010	\$28.93	Alfano's Restaurant	Clearwater, FL	Yes	Restaurant	
923	735	KS	Monday, January 25, 2010	\$136.18	CVS	Holiday, FL	Yes	Pharmacy	
925	736	HA	Monday, January 25, 2010	\$5.11	McDonald's	Holiday, FL	Yes	Fast Food	
928	737	HA	Tuesday, January 26, 2010	\$8.31	McDonald's	Holiday, FL	Yes	Fast Food	
931	738	HA	Tuesday, January 26, 2010	\$49.16	Sandpearl Resort	Clearwater Beach, FL	Yes	Hotel	
933	739	HA	Wednesday, January 27, 2010	\$10.23	McDonald's	Holiday, FL	Yes	Fast Food	
938	740	HA	Friday, January 29, 2010	\$6.18	McDonald's	Holiday, FL	Yes	Fast Food	
940	741	KS	Friday, January 29, 2010	\$169.89	T.G.I. Fridays	Tampa, FL	Yes	Restaurant	
941	742	HA	Saturday, January 30, 2010	\$59.39	Holiday Cleaners	Holiday, FL	Yes	Dry Cleaner	
942	743	KS	Saturday, January 30, 2010	\$87.30	Home Depot	Holiday, FL	Yes	Home Improvement	
943	744	HA	Sunday, January 31, 2010	\$438.80	Casaludovico	Palm Harbor, FL	Yes	Restaurant	
944	745	KS	Monday, February 01, 2010	\$13.07	DD/BR	Palm Harbor, FL	Yes	Fast Food	
945	746	HA	Monday, February 01, 2010	\$5.11	McDonald's	Holiday, FL	Yes	Fast Food	
946	747	HA	Monday, February 01, 2010	\$48.71	Nick's Chgo	Dunedin, FL	Yes	Gas Station/Store	
947	748	HA	Monday, February 01, 2010	\$15.82	TGI Fridays	Tampa, FL	Yes	Restaurant	
948	749	HA	Tuesday, February 02, 2010	\$55.69	Angelo's Pizza	Holiday, FL	Yes	Restaurant	
949	750	HA	Tuesday, February 02, 2010	\$137.79	Avis Rent A Car	Newark, NJ	Yes	Rental Cars	
950	751	KS	Tuesday, February 02, 2010	\$4.27	McDonald's	Holiday, FL	Yes	Fast Food	

Original Number	Amended Number	Purchaser	Date	Amount	Vendor	Location	Fund (Y/N)	Expense Type	Changes
951	752	LF	Tuesday, February 02, 2010	\$22.95	Pat's Pizzeria	Glen Mills, PA	Yes	Restaurant	
952	753	LF	Tuesday, February 02, 2010	\$30.86	Sunoco	Wilmington, DE	Yes	Gas Station/Store	
953	754	HA	Wednesday, February 03, 2010	\$25.87	Alside F Gifts	Tampa, FL	Yes	Merchandise	
954	755	HA	Wednesday, February 03, 2010	\$1,766.58	Avis Rent A Car	Tampa, FL	Yes	Rental Cars	
955	756	HA	Wednesday, February 03, 2010	\$8.55	Flat Bread	Tampa, FL	Yes	Fast Food	
957	757	HA	Wednesday, February 03, 2010	\$7.79	McDonald's	Holiday, FL	Yes	Fast Food	
959	758	HA	Wednesday, February 03, 2010	\$26.87	Sunoco	Clearwater, FL	Yes	Gas Station/Store	
960	759	LF	Thursday, February 04, 2010	\$9.89	Dunkin Donuts	Philadelphia, PA	Yes	Fast Food	
961	760	LF	Thursday, February 04, 2010	\$20.69	Paradise	Philadelphia, PA	Yes	Merchandise	
962	761	KS	Thursday, February 04, 2010	\$20.50	Paradise	Phoenix, AZ	Yes	Merchandise	
963	762	KS	Thursday, February 04, 2010	\$1,956.03	St. Regis Princeville	Princeville, HI	Yes	Hotel	
964	763	KS	Thursday, February 04, 2010	\$1,956.03	St. Regis Princeville	Princeville, HI	Yes	Hotel	
965	764	KS	Thursday, February 04, 2010	\$1,956.03	St. Regis Princeville	Princeville, HI	Yes	Hotel	
966	765	KS	Thursday, February 04, 2010	\$1,956.03	St. Regis Princeville	Princeville, HI	Yes	Hotel	
967	766	KS	Thursday, February 04, 2010	\$1,304.02	St. Regis Princeville	Princeville, HI	Yes	Hotel	
968	767	KS	Thursday, February 04, 2010	\$1,304.02	St. Regis Princeville	Princeville, HI	Yes	Hotel	
969	768	KS	Friday, February 05, 2010	\$269.34	Hilton Garden Inn	Phoenix, AZ	Yes	Hotel	
970	769	LF	Friday, February 05, 2010	\$444.28	Sandpearl Resort	Clearwater Beach, FL	Yes	Hotel	Changed Phoenix, AZ to Phoenix, AZ
971	770	LF	Friday, February 05, 2010	\$444.28	Sandpearl Resort	Clearwater Beach, FL	Yes	Hotel	
972	771	LF	Saturday, February 06, 2010	\$26.52	Foodland	Princeville, HI	Yes	Grocery	
973	772	LF	Saturday, February 06, 2010	\$610.02	PostCards Café	Hanalei, HI	Yes	Restaurant	
975	773	KS	Saturday, February 06, 2010	\$795.35	St. Regis Princeville	Princeville, HI	Yes	Hotel	
976	774	HA	Sunday, February 07, 2010	\$5.40	Avis Rent A Car	Tampa, FL	Yes	Rental Cars	
977	775	HA	Sunday, February 07, 2010	\$36.00	Avis Rent A Car	Tampa, FL	Yes	Rental Cars	
978	776	HA	Monday, February 08, 2010	\$470.05	Gaylord's at Kihanihale	Kihanihale, HI	Yes	Hotel	
979	777	LF	Monday, February 08, 2010	\$92.86	The Hanalei Dolphin	Hanalei, HI	Yes	Restaurant	
980	778	KS	Monday, February 08, 2010	\$63.69	Westin Prince Market	Princeville, HI	Yes	Hotel	
981	779	LF	Wednesday, February 10, 2010	\$79.97	1-800-flowers.com	online	Yes	Flowers	
982	780	HA	Wednesday, February 10, 2010	\$21.71	Cafeteria	Lihue, HI	Yes	Restaurant	
983	781	LF	Wednesday, February 10, 2010	\$8.60	Chivon Lahaina	Lahaina, HI	Yes	Gas Station/Store	
984	782	LF	Wednesday, February 10, 2010	\$568.49	Hertz Car Rental	Lihue, HI	Yes	Rental Cars	
985	783	HA	Wednesday, February 10, 2010	\$595.36	National Car Rental	Lihue, HI	Yes	Car Rental	
986	784	LF	Wednesday, February 10, 2010	\$38.10	Union 76	Lihue, HI	Yes	Restaurant	
987	785	HA	Thursday, February 11, 2010	\$29.08	Denny's	Emeryville, CA	Yes	Restaurant	Changed Maryville, CA to Emeryville, CA
988	786	HA	Thursday, February 11, 2010	\$5.00	Embassy Suites	Burlingame, CA	Yes	Hotel	
989	787	HA	Thursday, February 11, 2010	\$318.13	Embassy Suites	Burlingame, CA	Yes	Hotel	
991	788	LF	Thursday, February 11, 2010	\$639.36	St. Regis Princeville	Princeville, HI	Yes	Hotel	
992	789	HA	Thursday, February 11, 2010	\$260.33	Tra Vigne Restaurant	St. Helena, CA	Yes	Restaurant	
993	790	HA	Friday, February 12, 2010	\$13.07	Pharmacy Integrative	Sonoma, CA	Yes	Pharmacy	
994	791	HA	Friday, February 12, 2010	\$12.07	Ranch Market Too	Yountville, CA	Yes	Restaurant	
995	792	HA	Saturday, February 13, 2010	\$272.48	Bouchon	Yountville, CA	Yes	Restaurant	
996	793	HA	Saturday, February 13, 2010	\$41.80	Silverado Brewing	St. Helena, CA	Yes	Restaurant	
997	794	HA	Monday, February 15, 2010	\$2.00	Avis Rent A Car	San Francisco, CA	Yes	Rental Cars	
998	795	HA	Monday, February 15, 2010	\$246.56	Avis Rent A Car	San Francisco, CA	Yes	Rental Cars	
999	796	HA	Monday, February 15, 2010	\$29.93	Boston Market	Safety Harbor, FL	Yes	Restaurant	
1000	797	HA	Tuesday, February 16, 2010	\$74.62	Alfonso Restaurant	Clearwater, FL	Yes	Restaurant	
1001	798	HA	Tuesday, February 16, 2010	\$51.26	Cody's Original Roadhouse	Tarpon Springs, FL	Yes	Restaurant	
1002	799	HA	Tuesday, February 16, 2010	\$6.40	McDonald's	Holiday, FL	Yes	Fast Food	
1003	800	LF	Tuesday, February 16, 2010	\$31.15	Pat's Pizzeria	Glen Mills, PA	Yes	Restaurant	
1004	801	LF	Wednesday, February 17, 2010	\$167.36	1-800-flowers.com	online	Yes	Flowers	
1005	802	KS	Wednesday, February 17, 2010	\$340.00	Berns Steak House	Tampa, FL	Yes	Restaurant	
1006	803	KS	Wednesday, February 17, 2010	\$24.78	Divino Italian Restaurant	Clearwater, FL	Yes	Restaurant	
1007	804	HA	Wednesday, February 17, 2010	\$6.48	Dunkin Donuts	Holiday, FL	Yes	Fast Food	
1008	805	LF	Wednesday, February 17, 2010	\$54.47	Pascatore's Italian	Glen Mills, PA	Yes	Restaurant	

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1009	806	HA	Thursday, February 18, 2010	\$83.43	Los Mayas	Clearwater, FL	Yes	Restaurant	Changed West Chester, PA to Clearwater, FL
1010	807	HA	Thursday, February 18, 2010	\$48.73	Rainbow 50's Diner	Holiday, FL	Yes	Restaurant	
1011	808	LF	Thursday, February 18, 2010	\$37.17	Walgreens (Happy Harry's)	West Chester, PA	Yes	Pharmacy	Changed Holiday, FL to West Chester, PA
1012	809	HA	Saturday, February 20, 2010	\$50.03	Angelo's Pizza	Holiday, FL	Yes	Restaurant	
1013	810	HA	Saturday, February 20, 2010	\$261.99	CVS	Holiday, FL	Yes	Pharmacy	
1014	811	HA	Saturday, February 20, 2010	\$226.79	Holiday Cleaners	Holiday, FL	Yes	Dry Cleaner	
1015	812	HA	Sunday, February 21, 2010	\$11.93	McDonald's	Holiday, FL	Yes	Fast Food	
1016	813	HA	Monday, February 22, 2010	\$213.98	Best Buy	Clearwater, FL	Yes	Merchandise	
1017	814	LF	Monday, February 22, 2010	\$201.12	Best Buy Internet	Richfield, MN	Yes	Merchandise	Changed Richfield, MN to Internet
1018	815	LF	Monday, February 22, 2010	\$201.12	Best Buy Internet	Richfield, MN	Yes	Merchandise	Changed Richfield, MN to Internet
1019	816	LF	Monday, February 22, 2010	\$201.12	Best Buy Internet	Richfield, MN	Yes	Merchandise	Changed Richfield, MN to Internet
1020	817	LF	Monday, February 22, 2010	\$201.12	Best Buy Internet	Richfield, MN	Yes	Merchandise	Changed Richfield, MN to Internet
1021	818	LF	Monday, February 22, 2010	\$201.12	Best Buy Internet	Richfield, MN	Yes	Merchandise	Changed Richfield, MN to Internet
1022	819	LF	Monday, February 22, 2010	\$201.12	Best Buy Internet	Richfield, MN	Yes	Merchandise	Changed Richfield, MN to Internet
1023	820	LF	Monday, February 22, 2010	\$201.12	Best Buy Internet	Richfield, MN	Yes	Merchandise	Changed Richfield, MN to Internet
1024	821	LF	Monday, February 22, 2010	\$201.12	Best Buy Internet	Richfield, MN	Yes	Merchandise	Changed Richfield, MN to Internet
1025	822	LF	Monday, February 22, 2010	\$201.12	Best Buy Internet	Richfield, MN	Yes	Merchandise	Changed Richfield, MN to Internet
1026	823	LF	Monday, February 22, 2010	\$201.12	Best Buy Internet	Richfield, MN	Yes	Merchandise	Changed Richfield, MN to Internet
1027	824	HA	Monday, February 22, 2010	\$5.77	Burger King	Clearwater, FL	Yes	Fast Food	
1028	825	HA	Monday, February 22, 2010	\$40.00	Holiday Citgo	Holiday, FL	Yes	Gas Station/Store	
1029	826	LF	Monday, February 22, 2010	\$7.31	McDonald's	Concordville, PA	Yes	Fast Food	
1030	827	HA	Monday, February 22, 2010	\$7.99	McDonald's	Holiday, FL	Yes	Fast Food	
1032	828	HA	Tuesday, February 23, 2010	\$76.60	Alfano's Restaurant	Clearwater, FL	Yes	Restaurant	
1033	829	KS	Tuesday, February 23, 2010	\$26.94	DD/RR	Clearwater, FL	Yes	Fast Food	
1038	830	HA	Tuesday, February 23, 2010	\$30.27	Walgreens	Clearwater, FL	Yes	Pharmacy	
1040	831	HA	Wednesday, February 24, 2010	\$4.48	McDonald's	Holiday, FL	Yes	Fast Food	
1042	832	HA	Thursday, February 25, 2010	\$25.08	Alside F Gifts	Tampa, FL	Yes	Merchandise	
1045	833	KS	Thursday, February 25, 2010	\$226.71	Genjardis Store - Grocery	Glen Mills, PA	Yes	Grocery	
1046	834	HA	Thursday, February 25, 2010	\$7.67	McDonald's	Holiday, FL	Yes	Fast Food	
1047	835	KS	Thursday, February 25, 2010	\$103.39	Pescatores Italian	Glen Mills, PA	Yes	Restaurant	
1050	836	HA	Friday, February 26, 2010	\$66.05	Nino's Pizza	Wilmington, DE	Yes	Restaurant	
1052	837	KS	Friday, February 26, 2010	\$14.55	Wawa	Prospect Park, PA	Yes	Gas Station/Store	
1053	838	HA	Saturday, February 27, 2010	\$20.26	Philadelphia's Famous Restaurant	Philadelphia, PA	Yes	Restaurant	
1054	839	KS	Saturday, February 27, 2010	\$70.16	Sweetbay	Holiday, FL	Yes	Grocery	
1055	840	KS	Saturday, February 27, 2010	\$154.52	Sweetbay	Holiday, FL	Yes	Grocery	
1056	841	KS	Sunday, February 28, 2010	\$40.24	Casaludovico	Palm Harbor, FL	Yes	Restaurant	
1057	842	HA	Sunday, February 28, 2010	\$136.42	Sandpearl Tate Island	Clearwater Beach, FL	Yes	Restaurant	
1058	843	HA	Monday, March 01, 2010	\$49.55	CVS	Holiday, FL	Yes	Pharmacy	
1061	844	HA	Wednesday, March 03, 2010	\$60.50	Angelo's Pizza	Clearwater, FL	Yes	Restaurant	
1062	845	LF	Wednesday, March 03, 2010	\$131.30	Pickles Plus Too	Clearwater, FL	Yes	Restaurant	
1063	846	LF	Wednesday, March 03, 2010	\$28.60	Sunoco	Wilmington, DE	Yes	Gas Station/Store	
1064	847	LF	Thursday, March 04, 2010	\$29.33	America Bar & Grill	Glen Mills, PA	Yes	Restaurant	
1065	848	HA	Thursday, March 04, 2010	\$5.54	McDonald's	Holiday, FL	Yes	Fast Food	
1066	849	HA	Friday, March 05, 2010	\$5.01	DD/RR	Palm Harbor, FL	Yes	Fast Food	
1068	850	LF	Friday, March 05, 2010	\$67.79	Pescatores Italian	Glen Mills, PA	Yes	Restaurant	
1069	851	LF	Saturday, March 06, 2010	\$11.18	McDonald's	Concordville, PA	Yes	Fast Food	
1070	852	HA	Saturday, March 06, 2010	\$15.60	Rainbow 50's Diner	Holiday, FL	Yes	Restaurant	
1072	853	HA	Sunday, March 07, 2010	\$18.47	Home Depot	Holiday, FL	Yes	Home Improvement	
1073	854	LF	Monday, March 08, 2010	\$14.48	Applebees	Middletown, DE	Yes	Restaurant	
1075	855	HA	Monday, March 08, 2010	\$7.67	McDonald's	Holiday, FL	Yes	Fast Food	
1076	856	HA	Monday, March 08, 2010	\$44.35	Shell Oil	Tarpon Springs, FL	Yes	Gas Station/Store	Changed Wilmington, DE to Tarpon Springs, FL
1077	857	HA	Tuesday, March 09, 2010	\$7.67	McDonald's	Holiday, FL	Yes	Fast Food	
1078	858	HA	Tuesday, March 09, 2010	\$22.44	Pickles Plus Too	Clearwater, FL	Yes	Restaurant	
1079	859	HA	Tuesday, March 09, 2010	\$67.95	Rainbow 50's Diner	Holiday, FL	Yes	Restaurant	

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1080	860	HA	Wednesday, March 10, 2010	\$19.12	Angelo's Pizza	Holiday, FL	Yes	Restaurant	
1081	861	HA	Wednesday, March 10, 2010	\$1.07	McDonald's	Holiday, FL	Yes	Fast Food	
1082	862	HA	Thursday, March 11, 2010	\$7.67	McDonald's	Holiday, FL	Yes	Fast Food	
1083	863	LF	Friday, March 12, 2010	\$32.69	Pat's Pizzeria	Glen Mills, PA	Yes	Restaurant	
1084	864	HA	Sunday, March 14, 2010	\$218.53	CVS	Holiday, FL	Yes	Pharmacy	
1085	865	HA	Sunday, March 14, 2010	\$4.98	DQ Grill & Chili	New Port Richey, FL	Yes	Fast Food	Changed Port Richey, FL to New Port Richey, FL
1086	866	HA	Sunday, March 14, 2010	\$48.59	Subco	Orlando, FL	Yes	Gas Station/Store	
1087	867	LF	Monday, March 15, 2010	\$24.61	Pickles Plus Too	Clearwater, FL	Yes	Restaurant	
1088	868	LF	Tuesday, March 16, 2010	\$5.36	Arby's	Clearwater, FL	Yes	Fast Food	
1089	869	LF	Tuesday, March 16, 2010	\$58.69	Okeefe's	Clearwater, FL	Yes	Restaurant	
1090	870	LF	Tuesday, March 16, 2010	\$36.32	Pickles Plus Too	Clearwater, FL	Yes	Restaurant	
1091	871	LF	Wednesday, March 17, 2010	\$49.42	Alfano's Restaurant	Clearwater, FL	Yes	Restaurant	
1093	872	HA	Thursday, March 18, 2010	\$1,805.37	Avis Rent a Car	Clearwater, FL	Yes	Rental Cars	
1097	873	HA	Friday, March 19, 2010	\$41.60	Rainbow Food Mart	Tampa, FL	Yes	Restaurant	
1098	874	HA	Saturday, March 20, 2010	\$8.98	Hooters	Tampa, FL	Yes	Restaurant	
1099	875	HA	Saturday, March 20, 2010	\$78.94	Hooters	Port Richey, FL	Yes	Restaurant	
1100	876	HA	Saturday, March 20, 2010	\$7.79	McDonald's	Port Richey, FL	Yes	Restaurant	
1101	877	LF	Saturday, March 20, 2010	\$11.16	Walgreens	Holiday, FL	Yes	Fast Food	
1102	878	LF	Sunday, March 21, 2010	\$43.19	APW Philly	Tampa, FL	Yes	Pharmacy	
1103	879	HA	Sunday, March 21, 2010	\$62.78	CVS	Philadelphia, PA	Yes	Restaurant	
1104	880	LF	Sunday, March 21, 2010	\$7.26	Fiat Bread	Holiday, FL	Yes	Pharmacy	
1105	881	HA	Sunday, March 21, 2010	\$113.04	Positano Ristorante	Tampa, FL	Yes	Fast Food	
1106	882	HA	Monday, March 22, 2010	\$64.70	Alfano's Restaurant	Palm Harbor, FL	Yes	Restaurant	
1107	883	HA	Monday, March 22, 2010	\$4.48	McDonald's	Clearwater, FL	Yes	Restaurant	
1108	884	LF	Monday, March 22, 2010	\$20.44	Panera Bread	Holiday, FL	Yes	Fast Food	
1109	885	LF	Monday, March 22, 2010	\$30.92	Sunoco	Wilmington, DE	Yes	Restaurant	
1110	886	HA	Tuesday, March 23, 2010	\$14.53	Arby's	Wilmington, DE	Yes	Gas Station/Store	
1111	887	LF	Tuesday, March 23, 2010	\$57.12	PF Chang's	Clearwater, FL	Yes	Fast Food	
1112	888	HA	Tuesday, March 23, 2010	\$48.66	Walgreens	Glen Mills, PA	Yes	Restaurant	
1113	889	HA	Wednesday, March 24, 2010	\$119.37	Casaldovico	Clearwater, FL	Yes	Pharmacy	
1114	890	LF	Wednesday, March 24, 2010	\$10.33	Dunkin Donuts	Palm Harbor, FL	Yes	Restaurant	
1115	891	HA	Wednesday, March 24, 2010	\$140.97	Holiday Cleaners	Chadds Ford, PA	Yes	Fast Food	
1117	892	HA	Wednesday, March 24, 2010	\$19.48	Pickles Plus Too	Holiday, FL	Yes	Dry Cleaner	
1118	893	HA	Wednesday, March 24, 2010	\$9.48	Starbucks	Clearwater, FL	Yes	Restaurant	
1119	894	HA	Thursday, March 25, 2010	\$98.66	Chili's Grill	Clearwater, FL	Yes	Fast Food	
1120	895	HA	Thursday, March 25, 2010	\$43.63	Holiday Citgo	Tarpon Springs, FL	Yes	Restaurant	
1121	896	LF	Thursday, March 25, 2010	\$29.33	Pat's Pizzeria	Holiday, FL	Yes	Gas Station/Store	
1122	897	HA	Thursday, March 25, 2010	\$25.06	Pickles Plus Too	Glen Mills, PA	Yes	Restaurant	
1124	898	KS	Friday, March 26, 2010	\$64.23	Pickles Plus Too	Clearwater, FL	Yes	Restaurant	
1125	899	KS	Friday, March 26, 2010	\$23.26	Sundown Sports Bar	Clearwater, FL	Yes	Restaurant	
1129	900	HA	Monday, March 29, 2010	\$42.69	Alside F Gifts	Palm Harbor, FL	Yes	Restaurant	
1130	901	HA	Monday, March 29, 2010	\$979.59	Avis Rent A Car	Tampa, FL	Yes	Merchandise	
1131	902	HA	Monday, March 29, 2010	\$48.56	Grillsmith	Tampa, FL	Yes	Rental Cars	
1132	903	HA	Monday, March 29, 2010	\$7.68	McDonald's	Clearwater, FL	Yes	Restaurant	
1133	904	HA	Monday, March 29, 2010	\$26.13	Sunoco	Dunedin, FL	Yes	Fast Food	
1134	905	KS	Monday, March 29, 2010	\$140.39	Walgreens	Clearwater, FL	Yes	Gas Station/Store	
1135	906	HA	Tuesday, March 30, 2010	\$13.32	Arby's	Dunedin, FL	Yes	Pharmacy	
1137	907	HA	Tuesday, March 30, 2010	\$7.09	McDonald's	West Chester, PA	Yes	Fast Food	
1138	908	HA	Wednesday, March 31, 2010	\$100.38	Pecatores Italian	Concordville, PA	Yes	Fast Food	
1139	909	KS	Thursday, April 01, 2010	\$68.95	Castello Di Amorosa	Glen Mills, PA	Yes	Restaurant	
1140	910	HA	Thursday, April 01, 2010	\$398.60	Dilworthtown Inn	Calistoga, CA	Yes	Restaurant	
1141	911	HA	Thursday, April 01, 2010	\$91.21	Pecatores Italian	West Chester, PA	Yes	Restaurant	
1142	912	LF	Thursday, April 01, 2010	\$267.15	Pizza Hut	Glen Mills, PA	Yes	Restaurant	
1144	913	HA	Friday, April 02, 2010	\$60.50	The Bicycle Club	Clearwater, FL	Yes	Restaurant	
						Englewood Cliffs, NJ	Yes	Restaurant	

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1145	914	HA	Friday, April 02, 2010	\$37.14	Wawa	West Chester, PA	Yes	Gas Station/Store	
1146	915	HA	Saturday, April 03, 2010	\$72.28	Flory Coins Restaurant	Ridgfield, CT	Yes	Restaurant	Changed Ridgfield, MN to Ridgfield, CT
1147	916	HA	Saturday, April 03, 2010	\$432.06	Porto Leggero	Jersey City, NJ	Yes	Restaurant	
1150	917	HA	Sunday, April 04, 2010	\$37.95	Philly Diner	Esington, PA	Yes	Restaurant	
1151	918	KS	Sunday, April 04, 2010	\$190.18	Rite Aid	Logan Township, NJ	Yes	Pharmacy	
1152	919	HA	Monday, April 05, 2010	\$50.00	CVS	Glen Mills, PA	Yes	Pharmacy	
1153	920	HA	Monday, April 05, 2010	\$176.71	Target	Berwyn, PA	Yes	Merchandise	Changed Glen Mills, PA to Berwyn, PA
1154	921	HA	Tuesday, April 06, 2010	\$5.60	Burger King	West Chester, PA	Yes	Fast Food	
1155	922	KS	Tuesday, April 06, 2010	\$336.87	Target	Wilmington, DE	Yes	Merchandise	
1156	923	LF	Tuesday, April 06, 2010	\$34.15	TGI Fridays	West Chester, PA	Yes	Restaurant	
1157	924	HA	Thursday, April 08, 2010	\$113.17	CVS	Glen Mills, PA	Yes	Pharmacy	
1159	925	HA	Friday, April 09, 2010	\$6.03	Chick-fil-A	Glen Mills, PA	Yes	Fast Food	
1160	926	LF	Friday, April 09, 2010	\$37.43	TGI Fridays	West Chester, PA	Yes	Restaurant	
1161	927	HA	Saturday, April 10, 2010	\$25.59	China Dragon	Boothwyn, PA	Yes	Restaurant	
1162	928	HA	Sunday, April 11, 2010	\$20.79	Nino's Pizza	Wilmington, DE	Yes	Restaurant	
1164	929	HA	Monday, April 12, 2010	\$18.20	Paradies	Philadelphia, PA	Yes	Merchandise	
1166	930	LF	Tuesday, April 13, 2010	\$10.22	McDonald's	Concordville, PA	Yes	Fast Food	
1168	931	LF	Tuesday, April 13, 2010	\$52.58	Nino's Pizza	West Chester, PA	Yes	Restaurant	
1169	932	LF	Thursday, April 15, 2010	\$50.15	Bertucci's	Glen Mills, PA	Yes	Restaurant	
1175	933	HA	Tuesday, April 20, 2010	\$264.17	Chicago Palm Inc.	Chicago, IL	Yes	Hotel	
1176	934	HA	Wednesday, April 21, 2010	\$625.15	Bice Ristorante	Chicago, IL	Yes	Restaurant	
1177	935	HA	Thursday, April 22, 2010	\$98.30	Hudson News CM	Chicago, IL	Yes	Merchandise	
1178	936	HA	Thursday, April 22, 2010	\$116.25	Positano Ristorante	Palm Harbor, FL	Yes	Restaurant	
1180	937	HA	Friday, April 23, 2010	\$5.54	McDonald's	Holiday, FL	Yes	Fast Food	
1181	938	LF	Friday, April 23, 2010	\$144.47	Pickles Plus Too	Clearwater, FL	Yes	Restaurant	
1182	939	HA	Saturday, April 24, 2010	\$174.96	Cody's Original Roadhouse	Tarpon Springs, FL	Yes	Restaurant	
1183	940	HA	Saturday, April 24, 2010	\$25.25	Holiday Clgo	Holiday, FL	Yes	Gas Station/Store	
1184	941	HA	Saturday, April 24, 2010	\$24.26	Rainbow 50's Diner	Holiday, FL	Yes	Restaurant	
1186	942	HA	Tuesday, April 27, 2010	\$5.23	McDonald's	Holiday, FL	Yes	Fast Food	
1187	943	HA	Wednesday, April 28, 2010	\$148.97	Home Depot	Holiday, FL	Yes	Home Improvement	
1188	944	LF	Wednesday, April 28, 2010	\$47.90	TGI Fridays	West Chester, PA	Yes	Restaurant	
1189	945	KS	Thursday, April 29, 2010	\$73.84	Wald Disney World	Orlando, FL	Yes	Recreation	
1190	946	LF	Friday, April 30, 2010	\$44.40	McKenzie Brew House	Glen Mills, PA	Yes	Restaurant	
1191	947	LF	Friday, April 30, 2010	\$114.25	Pescatore's Italian	Glen Mills, PA	Yes	Restaurant	
1192	948	HA	Saturday, May 01, 2010	\$46.50	Holiday Clgo	Holiday, FL	Yes	Gas Station/Store	
1193	949	HA	Saturday, May 01, 2010	\$171.67	Home Depot	Holiday, FL	Yes	Home Improvement	
1195	950	HA	Monday, May 03, 2010	\$61.18	Angelo's Pizza	Holiday, FL	Yes	Restaurant	
1196	951	KS	Monday, May 03, 2010	\$151.15	Home Depot	Holiday, FL	Yes	Home Improvement	
1197	952	KS	Monday, May 03, 2010	\$246.77	Sweetbay	Holiday, FL	Yes	Grocery	
1198	953	HA	Tuesday, May 04, 2010	\$46.96	Alside F Gifts	Tampa, FL	Yes	Merchandise	
1199	954	LF	Tuesday, May 04, 2010	\$18.98	Applebees	Middletown, DE	Yes	Restaurant	
1200	955	HA	Tuesday, May 04, 2010	\$1,255.69	Avis Rent A Car	Tampa, FL	Yes	Rental Cars	
1201	956	HA	Tuesday, May 04, 2010	\$8.10	McDonald's	Holiday, FL	Yes	Fast Food	
1202	957	LF	Tuesday, May 04, 2010	\$20.68	Pati's Pizzeria	Glen Mills, PA	Yes	Restaurant	
1203	958	HA	Tuesday, May 04, 2010	\$27.10	Sunoco	Clearwater, FL	Yes	Gas Station/Store	
1204	959	LF	Wednesday, May 05, 2010	\$171.27	California Tortilla	Glen Mills, PA	Yes	Restaurant	
1206	960	HA	Wednesday, May 05, 2010	\$56.61	Pescatore's Italian	Glen Mills, PA	Yes	Restaurant	
1207	961	KS	Wednesday, May 05, 2010	\$106.00	Verizon	Glen Mills, PA	Yes	Phone	
1208	962	HA	Wednesday, May 05, 2010	\$592.91	Verizon Wireless	Glen Mills, PA	Yes	Phone	
1209	963	KS	Thursday, May 06, 2010	\$143.08	Bed Bath & Beyond	Wynnewood, PA	Yes	Merchandise	
1210	964	HA	Thursday, May 06, 2010	\$52.29	Nino's Pizza	Wilmington, DE	Yes	Restaurant	
1212	965	LF	Thursday, May 06, 2010	\$29.05	Shell Oil	Wilmington, DE	Yes	Gas Station/Store	
1213	966	HA	Thursday, May 06, 2010	\$6.79	Wawa	Chadds Ford, PA	Yes	Gas Station/Store	
1214	967	LF	Friday, May 07, 2010	\$63.31	Bath & Body Works	Wilmington, DE	Yes	Merchandise	

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1215	968	LF	Friday, May 07, 2010	\$40.28	Bertucci's	Glen Mills, PA	Yes	Restaurant	
1216	969	LF	Friday, May 07, 2010	\$76.47	Chesapeake Inn	Chesapeake, MD	Yes	Restaurant	
1217	970	HA	Friday, May 07, 2010	\$6.83	McDonald's	Concordville, PA	Yes	Fast Food	
1219	971	HA	Friday, May 07, 2010	\$50.68	Wawa	Concordville, PA	Yes	Gas Station/Store	
1220	972	HA	Saturday, May 08, 2010	\$484.54	Genjardis Store - Grocery	Wilmington, DE	Yes	Grocery	Changed \$484.50 to \$484.54
1222	973	HA	Sunday, May 09, 2010	\$241.93	RA @ Longwood Garden	Kennett Square, PA	Yes	Recreation	
1223	974	HA	Monday, May 10, 2010	\$129.39	Maggiolo's	Tampa, FL	Yes	Restaurant	
1224	975	LF	Monday, May 10, 2010	\$12.93	Paradies	Philadelphia, PA	Yes	Merchandise	
1225	976	LF	Monday, May 10, 2010	\$47.78	Walgreens	Clearwater, FL	Yes	Pharmacy	
1226	977	LF	Tuesday, May 11, 2010	\$119.35	Island Way Grill	Clearwater, FL	Yes	Restaurant	
1227	978	HA	Tuesday, May 11, 2010	\$7.67	McDonald's	Holiday, FL	Yes	Fast Food	
1228	979	HA	Tuesday, May 11, 2010	\$7.69	McDonald's	Lakeland, FL	Yes	Fast Food	
1229	980	LF	Tuesday, May 11, 2010	\$144.60	Pickles Plus Too	Clearwater, FL	Yes	Restaurant	
1230	981	HA	Tuesday, May 11, 2010	\$19.71	Pickles Plus Too	Clearwater, FL	Yes	Restaurant	
1231	982	LF	Wednesday, May 12, 2010	\$6.79	Land Starbuck's	Tampa, FL	Yes	Fast Food	
1232	983	LF	Thursday, May 13, 2010	\$42.65	TGI Fridays	West Chester, PA	Yes	Restaurant	
1234	984	HA	Friday, May 14, 2010	\$491.84	Renatos	Palm Beach, FL	Yes	Restaurant	
1235	985	HA	Saturday, May 15, 2010	\$311.33	Chez Jean Pierre	Palm Beach, FL	Yes	Restaurant	
1236	986	HA	Sunday, May 16, 2010	\$685.78	Avis Rent A Car	Tampa, FL	Yes	Rental Cars	
1237	987	HA	Monday, May 17, 2010	\$111.91	Pescatores Italian	Glen Mills, PA	Yes	Restaurant	
1238	988	HA	Tuesday, May 18, 2010	\$62.63	Pescatores Italian	Glen Mills, PA	Yes	Restaurant	
1239	989	LF	Tuesday, May 18, 2010	\$23.16	Wawa	Concordville, PA	Yes	Gas Station/Store	
1240	990	HA	Wednesday, May 19, 2010	\$48.62	American Auto	Boothwyn, PA	Yes	Gas Station/Store	
1241	991	LF	Wednesday, May 19, 2010	\$85.01	Bertucci's	Glen Mills, PA	Yes	Restaurant	
1242	992	HA	Wednesday, May 19, 2010	\$4.65	Wendy's	Boothwyn, PA	Yes	Fast Food	
1243	993	LF	Thursday, May 20, 2010	\$45.57	Ruby's Diner	Glen Mills, PA	Yes	Restaurant	
1244	994	HA	Friday, May 21, 2010	\$88.99	Harry's Savoy Grill	Wilmington, DE	Yes	Restaurant	Changed; Best Friends Pet to Harry's Savoy Grill, Pet to Restaurant, Chadds Ford PA to Wilmington DE
1245	995	LF	Friday, May 21, 2010	\$164.74	Lowe's	Clearwater, FL	Yes	Home Improvement	
1246	996	LF	Monday, May 24, 2010	\$52.20	Harvest	Glen Mills, PA	Yes	Restaurant	
1247	997	HA	Monday, May 24, 2010	\$50.85	Pescatores Italian	Glen Mills, PA	Yes	Restaurant	
1248	998	LF	Tuesday, May 25, 2010	\$3.87	McDonald's	Concordville, PA	Yes	Fast Food	
1249	999	KS	Tuesday, May 25, 2010	\$15.79	Nino's Pizza	Wilmington, DE	Yes	Restaurant	
1250	1000	HA	Tuesday, May 25, 2010	\$23.27	Pescatores Italian	Glen Mills, PA	Yes	Restaurant	
1251	1001	KS	Tuesday, May 25, 2010	\$224.57	Ruth's Chris Steakhouse	Baltimore, MD	Yes	Restaurant	
1252	1002	LF	Tuesday, May 25, 2010	\$38.45	Sinoco	Odessa, DE	Yes	Restaurant	Changed Odessa, FL to Odessa, DE
1253	1003	HA	Tuesday, May 25, 2010	\$39.41	Wawa	Chadds Ford, PA	Yes	Gas Station/Store	
1254	1004	KS	Wednesday, May 26, 2010	\$440.00	Aldo's Ristorante	Baltimore, MD	Yes	Restaurant	
1255	1005	HA	Thursday, May 27, 2010	\$21.93	Hooters of Concord	Glen Mills, PA	Yes	Restaurant	
1256	1006	HA	Friday, May 28, 2010	\$23.00	The Bicycle Club	Englewood Cliffs, NJ	Yes	Restaurant	
1257	1007	HA	Friday, May 28, 2010	\$111.33	The Bicycle Club	Englewood Cliffs, NJ	Yes	Restaurant	
1258	1008	HA	Saturday, May 29, 2010	\$222.54	Globe Restaurant	Larchmont, NY	Yes	Restaurant	
1259	1009	HA	Saturday, May 29, 2010	\$42.30	The Stumble Inn	New York, NY	Yes	Restaurant	
1260	1010	HA	Saturday, May 29, 2010	\$10.00	Windsor Garage (Parking lot)	New York, NY	Yes	Parking	
1261	1011	HA	Monday, May 31, 2010	\$17.12	Angelo's Pizza	Holiday, FL	Yes	Restaurant	
1262	1012	LF	Tuesday, June 01, 2010	\$101.82	Alfonso Restaurant	Clearwater, FL	Yes	Restaurant	
1263	1013	LF	Tuesday, June 01, 2010	\$42.95	CVS	Clearwater, FL	Yes	Pharmacy	
1264	1014	LF	Tuesday, June 01, 2010	\$49.63	CVS	Clearwater, FL	Yes	Pharmacy	
1265	1015	LF	Tuesday, June 01, 2010	\$41.28	Pickles Plus Too	Clearwater, FL	Yes	Restaurant	
1266	1016	KS	Wednesday, June 02, 2010	\$140.00	Cody's Original Roadhouse	Tarpon Springs, FL	Yes	Restaurant	
1267	1017	LF	Wednesday, June 02, 2010	\$42.93	Pickles Plus Too	Clearwater, FL	Yes	Restaurant	
1268	1018	LF	Wednesday, June 02, 2010	\$35.06	Smoky Bones	Clearwater, FL	Yes	Restaurant	
1269	1019	LF	Thursday, June 03, 2010	\$9.40	Giant Oil	Clearwater, FL	Yes	Gas Station/Store	

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1270	1020	HA	Thursday, June 03, 2010	\$24.88	Holiday Cigo	Holiday, FL	Yes	Gas Station/Store	
1271	1021	LF	Thursday, June 03, 2010	\$6.79	Land Starbucks	Tampa, FL	Yes	Fast Food	
1272	1022	HA	Thursday, June 03, 2010	\$9.48	McDonald's	Holiday, FL	Yes	Fast Food	
1273	1023	LF	Thursday, June 03, 2010	\$6.79	Starbucks	Clearwater, FL	Yes	Fast Food	Changed KS to LF
1274	1024	LF	Friday, June 04, 2010	\$164.74	Lowe's	Clearwater, FL	Yes	Home Improvement	
1275	1025	KS	Sunday, June 06, 2010	\$1,432.50	Animal Kingdom Lodge	Lake Buena Vista, FL	Yes	Hotel	
1276	1026	KS	Sunday, June 06, 2010	\$538.61	Animal Kingdom Lodge	Lake Buena Vista, FL	Yes	Hotel	
1277	1027	HA	Sunday, June 06, 2010	\$633.52	Avis Rent A Car	Tampa, FL	Yes	Rental Cars	
1278	1028	HA	Sunday, June 06, 2010	\$16.57	Exxon Mobil	Orlando, FL	Yes	Gas Station/Store	
1279	1029	HA	Sunday, June 06, 2010	\$20.91	Hudson News	Orlando, FL	Yes	Merchandise	
1280	1030	KS	Sunday, June 06, 2010	\$11.37	Qdoba	Orlando, FL	Yes	Fast Food	
1281	1031	HA	Sunday, June 06, 2010	\$5.62	Wendy's	Orlando, FL	Yes	Fast Food	
1282	1032	LF	Monday, June 07, 2010	\$164.98	Boscov's Department Store	Newark, DE	Yes	Department Store	Changed Newark, NJ to Newark, DE
1283	1033	LF	Monday, June 07, 2010	\$33.61	TGI Fridays	West Chester, PA	Yes	Restaurant	
1284	1034	HA	Monday, June 07, 2010	\$15.74	TGI Fridays	West Chester, PA	Yes	Restaurant	
1285	1035	HA	Monday, June 07, 2010	\$10.05	Wawa	Chadds Ford, PA	Yes	Gas Station/Store	
1286	1036	HA	Tuesday, June 08, 2010	\$5.83	McDonald's	Concordville, PA	Yes	Fast Food	
1287	1037	LF	Tuesday, June 08, 2010	\$20.68	Pat's Pizzeria	Glen Mills, PA	Yes	Restaurant	
1288	1038	LF	Tuesday, June 08, 2010	\$104.33	Tony's Pizzeria	Clearwater, FL	Yes	Restaurant	
1289	1039	HA	Friday, June 11, 2010	\$71.64	Pescatores Italian	Glen Mills, PA	Yes	Restaurant	
1290	1040	HA	Friday, June 11, 2010	\$31.82	Wal-Mart	Boothwyn, PA	Yes	Merchandise	
1291	1041	HA	Friday, June 11, 2010	\$31.67	Wawa	Chadds Ford, PA	Yes	Gas Station/Store	
1292	1042	HA	Saturday, June 12, 2010	\$91.82	Outback	Glen Mills, PA	Yes	Restaurant	
1293	1043	LF	Saturday, June 12, 2010	\$20.46	Wawa	Middletown, DE	Yes	Gas Station/Store	
1294	1044	HA	Monday, June 14, 2010	\$44.01	Sunoco	Woodbridge, NJ	Yes	Gas Station/Store	
1295	1045	LF	Monday, June 14, 2010	\$35.72	T.G.I. Fridays	West Chester, PA	Yes	Restaurant	
1296	1046	LF	Wednesday, June 16, 2010	\$30.39	America Bar & Grill	Glen Mills, PA	Yes	Restaurant	
1297	1047	HA	Wednesday, June 16, 2010	\$27.68	Cibo Bistro & Wine	Philadelphia, PA	Yes	Restaurant	
1300	1048	HA	Wednesday, June 16, 2010	\$31.56	Friendly's Ice Cream	Indian Harbor, FL	Yes	Restaurant	
1301	1049	HA	Wednesday, June 16, 2010	\$30.17	Paradies	Philadelphia, PA	Yes	Merchandise	
1302	1050	LF	Thursday, September 16, 2010	\$37.82	Pickles Plus Too	Clearwater, FL	Yes	Restaurant	Changed the date from 6/16/2010 to 9/16/2010
1303	1051	LF	Thursday, September 16, 2010	\$32.91	Tony's Pizzeria	Clearwater, FL	Yes	Restaurant	Changed the date from 6/16/2010 to 9/16/2010
1304	1052	HA	Thursday, June 17, 2010	\$132.25	Foreman's Steakhouse	Indian Harbor, FL	Yes	Restaurant	Changed the date from 6/16/2010 to 9/16/2010
1305	1053	HA	Friday, June 18, 2010	\$18.14	Wawa	Chadds Ford, PA	Yes	Gas Station/Store	
1306	1054	LF	Sunday, June 20, 2010	\$173.48	Kohl's	Middletown, DE	Yes	Merchandise	
1307	1055	HA	Monday, June 21, 2010	\$58.99	Pescatores Italian	Glen Mills, PA	Yes	Restaurant	
1308	1056	LF	Monday, June 21, 2010	\$25.35	PF Chang's	Glen Mills, PA	Yes	Restaurant	
1309	1057	HA	Tuesday, June 22, 2010	\$5.23	Burger King	Cherry Hill, NJ	Yes	Fast Food	
1311	1058	LF	Tuesday, June 22, 2010	\$18.26	Panera Bread	Wilmington, DE	Yes	Restaurant	
1312	1059	HA	Tuesday, June 22, 2010	\$11.73	Rite Aid	Boothwyn, PA	Yes	Pharmacy	
1313	1060	HA	Tuesday, June 22, 2010	\$46.43	Wawa	Chadds Ford, PA	Yes	Gas Station/Store	
1314	1061	LF	Wednesday, June 23, 2010	\$79.98	Purchase for electronics at newegg.com	online	Yes	Merchandise	
1315	1062	HA	Wednesday, June 23, 2010	\$52.73	Sunoco	Boothwyn, PA	Yes	Gas Station/Store	
1316	1063	HA	Thursday, June 24, 2010	\$29.84	Cibo Bistro Wine	Philadelphia, PA	Yes	Restaurant	
1317	1064	HA	Thursday, June 24, 2010	\$56.97	Paradies	Philadelphia, PA	Yes	Merchandise	
1318	1065	LF	Thursday, June 24, 2010	\$47.35	Pat's Pizzeria of Glen Mills	Glen Mills, PA	Yes	Restaurant	
1319	1066	HA	Thursday, June 24, 2010	\$40.29	Pizzeria Capri	Sonoma, CA	Yes	Restaurant	
1320	1067	LF	Friday, June 25, 2010	\$27.28	Dunkin Donuts	Chadds Ford, PA	Yes	Fast Food	
1323	1068	HA	Sunday, June 27, 2010	\$205.82	Capannina	San Francisco, CA	Yes	Restaurant	
1327	1069	HA	Monday, June 28, 2010	\$26.36	Bay Reader Wall	San Francisco, CA	Yes	Merchandise	
1328	1070	HA	Tuesday, June 29, 2010	\$7.13	Dunkin Donuts	Bellmawr, PA	Yes	Fast Food	
1329	1071	LF	Tuesday, June 29, 2010	\$53.77	Five Guy's	Glen Mills, PA	Yes	Fast Food	
1330	1072	LF	Wednesday, June 30, 2010	\$10.49	Applebees	Middletown, DE	Yes	Restaurant	
1331	1073	HA	Wednesday, June 30, 2010	\$41.16	Pescatores Italian	Glen Mills, PA	Yes	Restaurant	

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1332	1074	HA	Thursday, July 01, 2010	\$109.80	Concordville Inn Restaurant	Concordville, PA	Yes	Restaurant	
1333	1075	LF	Friday, July 02, 2010	\$6.78	Boston Market	Wilmington, DE	Yes	Restaurant	
1334	1076	HA	Friday, July 02, 2010	\$41.10	Wawa	Chadds Ford, PA	Yes	Gas Station/Store	
1335	1077	HA	Tuesday, July 06, 2010	\$32.69	Pescatore's Italian	Glen Mills, PA	Yes	Restaurant	
1336	1078	KS	Wednesday, July 07, 2010	\$80.90	Fiorillo's Café	West Chester, PA	Yes	Restaurant	
1337	1079	HA	Wednesday, July 07, 2010	\$54.75	Pescatore's Italian	Glen Mills, PA	Yes	Restaurant	
1338	1080	LF	Wednesday, July 07, 2010	\$26.65	Shell Oil	Wilmington, DE	Yes	Gas Station/Store	
1339	1081	KS	Thursday, July 08, 2010	\$34.96	La Toitca	Wilmington, DE	Yes	Restaurant	
1340	1082	HA	Thursday, July 08, 2010	\$69.03	McKenzie Brew House	Glen Mills, PA	Yes	Restaurant	
1342	1083	LF	Friday, July 09, 2010	\$25.50	7-Eleven	Aston, NY	Yes	Gas Station/Store	
1343	1084	HA	Friday, July 09, 2010	\$86.70	Dinello's	River Edge, NJ	Yes	Restaurant	
1344	1085	LF	Friday, July 09, 2010	\$38.32	Rite Aid	Glen Mills, PA	Yes	Pharmacy	
1346	1086	HA	Saturday, July 10, 2010	\$110.27	Timmy's By the River Front	New York, NY	Yes	Restaurant	
1347	1087	HA	Saturday, July 10, 2010	\$31.00	Windsor Garage	New York, NY	Yes	Parking	
1348	1088	KS	Sunday, July 11, 2010	\$24.23	Courtyard Hotel	New York, NY	Yes	Hotel	
1349	1089	KS	Sunday, July 11, 2010	\$140.59	Crowns Nest	New York, NY	Yes	Restaurant	
1350	1090	KS	Sunday, April 21, 2010	\$57.00	Dave and Busters	Philadelphia, PA	Yes	Recreation	Changed from 7/11/10 to 4/11/10
1351	1091	HA	Sunday, July 11, 2010	\$55.04	Shell Oil	Jersey City, NJ	Yes	Gas Station/Store	
1352	1092	KS	Monday, July 12, 2010	\$5,884.56	Courtyard Hotel	New York, NY	Yes	Hotel	
1353	1093	KS	Monday, July 12, 2010	-\$1,309.31	Courtyard Hotel - Reallocation	New York, NY	Yes	Hotel	
1354	1094	HA	Tuesday, July 13, 2010	\$66.98	Angelo's Pizza	Holiday, FL	Yes	Restaurant	
1355	1095	HA	Tuesday, July 13, 2010	\$18.35	Paradies	Philadelphia, PA	Yes	Merchandise	
1356	1096	HA	Wednesday, July 14, 2010	\$165.75	Home Depot	Holiday, FL	Yes	Home Improvement	
1357	1097	HA	Wednesday, July 14, 2010	\$38.09	KFC	New Port Richey, FL	Yes	Fast Food	
1358	1098	HA	Wednesday, July 14, 2010	\$13.41	McDonald's	Holiday, FL	Yes	Fast Food	
1359	1099	HA	Thursday, July 15, 2010	\$34.09	Angelo's Pizza	Holiday, FL	Yes	Restaurant	
1360	1100	HA	Thursday, July 15, 2010	\$37.72	CVS	Holiday, FL	Yes	Pharmacy	
1361	1101	HA	Thursday, July 15, 2010	\$15.57	Home Depot	Holiday, FL	Yes	Home Improvement	Changed Middletown, DE to Holiday FL
1362	1102	LF	Thursday, July 15, 2010	\$4.75	McDonald's	Beer, DE	Yes	Fast Food	Changed Holiday, FL to Beer, DE
1363	1103	LF	Thursday, July 15, 2010	\$40.14	Walgreens (Happy Harry's)	Middletown, DE	Yes	Pharmacy	Added Middletown as the location
1364	1104	HA	Friday, July 16, 2010	\$29.92	CVS	Holiday, FL	Yes	Pharmacy	
1365	1105	LF	Friday, July 16, 2010	\$31.59	Giant Food	Middletown, DE	Yes	Grocery	
1367	1106	HA	Friday, July 16, 2010	\$25.49	Sunoco	New Port Richey, FL	Yes	Gas Station/Store	
1368	1107	HA	Friday, July 16, 2010	\$213.20	Vincenzo's	New Port Richey, FL	Yes	Restaurant	
1369	1108	HA	Friday, July 16, 2010	\$11.52	Wal-Mart	Palm Harbor, FL	Yes	Merchandise	
1370	1109	KS	Saturday, July 17, 2010	\$138.88	Cody's Original Roadhouse	Tarpon Springs, FL	Yes	Restaurant	
1371	1110	HA	Saturday, July 17, 2010	\$18.64	McDonald's	Holiday, FL	Yes	Fast Food	
1372	1111	HA	Monday, July 19, 2010	\$47.23	Alfonso's Restaurant	Clearwater, FL	Yes	Restaurant	
1373	1112	LF	Monday, July 19, 2010	\$28.91	Ruby's Diner	Glen Mills, PA	Yes	Restaurant	
1375	1113	LF	Tuesday, July 20, 2010	\$12.62	Pickles Plus Too	Clearwater, FL	Yes	Restaurant	
1376	1114	LF	Tuesday, July 20, 2010	\$39.52	Pickles Plus Too	Clearwater, FL	Yes	Restaurant	
1377	1115	HA	Tuesday, July 20, 2010	\$57.82	Shell Oil	Palm Harbor, FL	Yes	Gas Station/Store	
1378	1116	HA	Wednesday, July 21, 2010	\$78.98	Alfonso's Restaurant	Clearwater, FL	Yes	Restaurant	
1379	1117	LF	Wednesday, July 21, 2010	\$35.52	T.G.I. Fridays	West Chester, PA	Yes	Restaurant	
1380	1118	LF	Thursday, July 22, 2010	\$8.22	McDonald's	Concordville, PA	Yes	Fast Food	
1381	1119	LF	Thursday, July 22, 2010	\$63.57	Tony's Pizzeria	Clearwater, FL	Yes	Restaurant	
1382	1120	LF	Thursday, July 22, 2010	\$28.30	Wawa	Middletown, DE	Yes	Gas Station/Store	
1383	1121	LF	Friday, July 23, 2010	\$15.25	McDonald's	Concordville, PA	Yes	Fast Food	
1386	1122	HA	Sunday, July 25, 2010	\$22.46	KFC	New Port Richey, FL	Yes	Fast Food	Changed Port Richey, FL to New Port Richey, FL
1387	1123	KS	Sunday, July 25, 2010	\$266.19	Sweetbay	Holiday, FL	Yes	Grocery	
1388	1124	HA	Sunday, July 25, 2010	\$7.24	Wendy's	Palm Harbor, FL	Yes	Fast Food	
1389	1125	LF	Monday, July 26, 2010	\$39.28	Bertucci's	Glen Mills, PA	Yes	Restaurant	
1390	1126	HA	Monday, July 26, 2010	\$4.25	Burger King	Holiday, FL	Yes	Fast Food	
1391	1127	KS	Monday, July 26, 2010	-\$1.21	Courtyard Hotel - 5% Cashback on 24.23	New York, NY	Yes	Hotel	

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1392	1128	HA	Monday, July 26, 2010	\$59.78	Hess	Holiday, FL	Yes	Gas Station/Store	
1393	1129	KS	Monday, July 26, 2010	\$278.25	Home Depot	Holiday, FL	Yes	Home Improvement	
1394	1130	KS	Monday, July 26, 2010	\$333.99	Walmart	Palm Harbor, FL	Yes	Merchandise	
1395	1131	HA	Tuesday, July 27, 2010	\$59.17	Angelo's Pizza	Holiday, FL	Yes	Restaurant	
1396	1132	KS	Tuesday, July 27, 2010	\$294.23	Courtyard Hotel - 5% Cashback on 5884.56	New York, NY	Yes	Hotel	
1397	1133	LF	Tuesday, July 27, 2010	\$29.35	Shell Oil	Wilmington, DE	Yes	Gas Station/Store	
1398	1134	KS	Tuesday, July 27, 2010	\$767.94	Verizon	Clearwater, FL	Yes	Phone	
1399	1135	KS	Wednesday, July 28, 2010	\$34.84	Arby's	New Port Richie, FL	Yes	Fast Food	
1400	1136	HA	Thursday, July 29, 2010	\$324.13	Casluodvico	Palm Harbor, FL	Yes	Restaurant	
1401	1137	HA	Thursday, July 29, 2010	\$2.56	McDonald's	Holiday, FL	Yes	Fast Food	
1402	1138	LF	Thursday, July 29, 2010	\$55.81	McKenzie Brew House	Glen Mills, PA	Yes	Restaurant	
1403	1139	LF	Thursday, July 29, 2010	\$63.80	Pickles Plus Too	Clearwater, FL	Yes	Restaurant	
1404	1140	HA	Friday, July 30, 2010	\$116.79	Heilman's Restaurant	Clearwater, FL	Yes	Restaurant	
1408	1141	HA	Friday, July 30, 2010	\$40.71	Sandpearl	Clearwater Beach, FL	Yes	Hotel	
1409	1142	KS	Saturday, July 31, 2010	\$379.13	Home Depot	Holiday, FL	Yes	Home Improvement	
1410	1143	HA	Saturday, July 31, 2010	\$57.06	Shell Oil	Tarpon Springs, FL	Yes	Gas Station/Store	
1411	1144	HA	Saturday, July 31, 2010	\$156.40	Target	Trinity, FL	Yes	Merchandise	
1412	1145	KS	Saturday, July 31, 2010	\$292.51	Walmart	Palm Harbor, FL	Yes	Merchandise	
1413	1146	KS	Sunday, August 01, 2010	\$29.39	KFC	New Port Richie, FL	Yes	Fast Food	
1414	1147	KS	Sunday, August 01, 2010	\$132.67	Lowe's	New Port Richie, FL	Yes	Home Improvement	
1415	1148	HA	Monday, August 02, 2010	\$56.55	Alfano's Restaurant	Clearwater, FL	Yes	Fast Food	
1416	1149	KS	Monday, August 02, 2010	\$34.03	Burger King	Holiday, FL	Yes	Fast Food	
1417	1150	HA	Monday, August 02, 2010	\$42.05	Hess	Clearwater, FL	Yes	Gas Station/Store	Changed from \$34.03 to \$34.03.
1419	1151	LF	Tuesday, August 03, 2010	\$8.62	Hudson News	Clearwater, FL	Yes	Merchandise	
1420	1152	LF	Tuesday, August 03, 2010	\$76.25	Island Way Grill	Philadelphia, PA	Yes	Restaurant	
1423	1153	HA	Wednesday, August 04, 2010	\$72.10	Alfano's Restaurant	Clearwater Beach, FL	Yes	Restaurant	
1424	1154	KS	Wednesday, August 04, 2010	\$731.46	Ruth's Chris Steakhouse	Clearwater, FL	Yes	Restaurant	
1425	1155	LF	Friday, August 06, 2010	\$30.00	Blue Martini	Tampa, FL	Yes	Restaurant	
1426	1156	HA	Friday, August 06, 2010	\$105.78	Maggianno's	Tampa, FL	Yes	Restaurant	
1427	1157	HA	Friday, August 06, 2010	\$2,920.96	Maggianno's	Tampa, FL	Yes	Restaurant	
1428	1158	HA	Saturday, August 07, 2010	\$879.64	Palm Restaurant	Tampa, FL	Yes	Restaurant	
1429	1159	HA	Sunday, August 08, 2010	\$2,363.02	Avis Rent A Car	Tampa, FL	Yes	Rental Cars	
1430	1160	LF	Sunday, August 08, 2010	\$4.59	Kennedy BP	Tampa, FL	Yes	Gas Station/Store	
1431	1161	HA	Sunday, August 08, 2010	\$22.86	Kennedy BP	Tampa, FL	Yes	Gas Station/Store	
1432	1162	HA	Sunday, August 08, 2010	\$48.68	Kennedy BP	Tampa, FL	Yes	Gas Station/Store	
1433	1163	HA	Sunday, August 08, 2010	\$18.68	Rainbow 50's Diner	Tampa, FL	Yes	Gas Station/Store	
1434	1164	LF	Sunday, August 08, 2010	\$6.96	Starbucks	Holiday, FL	Yes	Restaurant	
1435	1165	HA	Monday, August 09, 2010	\$40.68	Chili's Grill	Tampa, FL	Yes	Fast Food	
1436	1166	KS	Tuesday, August 10, 2010	\$176.46	CVS	Tarpon Springs, FL	Yes	Pharmacy	
1437	1167	KS	Tuesday, August 10, 2010	\$242.23	Target	Holiday, FL	Yes	Merchandise	
1438	1168	KS	Wednesday, August 11, 2010	\$104.23	Cody's Original Roadhouse	Clearwater, FL	Yes	Merchandise	
1439	1169	LF	Wednesday, August 11, 2010	\$35.63	TGI Fridays	Tarpon Springs, FL	Yes	Restaurant	
1440	1170	HA	Thursday, August 12, 2010	\$19.62	Rainbow 50's Diner	West Chester, PA	Yes	Restaurant	
1441	1171	KS	Thursday, August 12, 2010	\$104.64	Sea Sea Riders Restaurant	Holiday, FL	Yes	Restaurant	
1442	1172	HA	Friday, August 13, 2010	\$66.78	Angelo's Pizza	Dunedin, FL	Yes	Restaurant	
1443	1173	LF	Saturday, August 14, 2010	\$68.72	BIS Wholesale	Holiday, FL	Yes	Restaurant	
1444	1174	HA	Saturday, August 14, 2010	\$44.34	Holiday Ctrgo	New Castle, NJ	Yes	Grocery	
1445	1175	HA	Saturday, August 14, 2010	\$226.90	Vincenzo's	Holiday, FL	Yes	Gas Station/Store	
1446	1176	HA	Sunday, August 15, 2010	\$29.95	Airside F Gifts	New Port Richey, FL	Yes	Restaurant	Changed Port Richey, FL to New Port Richey, FL
1447	1177	HA	Sunday, August 15, 2010	\$883.68	Avis Rent A Car	Tampa, FL	Yes	Merchandise	
1448	1178	HA	Sunday, August 15, 2010	\$11.41	Giant Oil	Tampa, FL	Yes	Rental Cars	
1449	1179	HA	Sunday, August 15, 2010	\$12.00	Wawa	Clearwater, FL	Yes	Gas Station/Store	
1450	1180	KS	Monday, August 16, 2010	\$47.04	Alfano's Restaurant	Chadds Ford, PA	Yes	Gas Station/Store	
1451	1181	HA	Monday, August 16, 2010	\$59.25	Pescatore's Italian	Clearwater, FL	Yes	Restaurant	
						Glen Mills, PA	Yes	Restaurant	

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1452	1182	HA	Tuesday, August 17, 2010	\$48.75	Lukeoil	Laurel, NJ	Yes	Gas Station/Store	
1453	1183	KS	Tuesday, August 17, 2010	\$19.00	Pickles Plus Too	Clearwater, FL	Yes	Restaurant	
1454	1184	KS	Wednesday, August 18, 2010	\$39.15	Chiang Mai	Clearwater, FL	Yes	Restaurant	
1455	1185	KS	Wednesday, August 18, 2010	\$103.22	Hilton Beach Resort - Restaurant	Clearwater, FL	Yes	Hotel	
1456	1186	LF	Wednesday, August 18, 2010	\$42.87	Ruby's Diner	Glen Mills, PA	Yes	Restaurant	
1457	1187	HA	Thursday, August 19, 2010	\$68.11	Cristino's Brick Oven	Clearwater, FL	Yes	Restaurant	
1461	1188	HA	Thursday, August 19, 2010	\$29.15	Peradises	Philadelphia, PA	Yes	Merchandise	
1462	1189	HA	Thursday, August 19, 2010	\$62.85	Smokely Bones	Clearwater, FL	Yes	Restaurant	
1463	1190	HA	Friday, August 20, 2010	\$48.54	Alfano's Restaurant	Clearwater, FL	Yes	Restaurant	
1464	1191	LF	Friday, August 20, 2010	\$27.48	Nino's Pizzeria	Middletown, DE	Yes	Restaurant	
1465	1192	HA	Saturday, August 21, 2010	\$18.21	Angelo's Pizzeria	Holiday, FL	Yes	Restaurant	
1466	1193	HA	Saturday, August 21, 2010	\$2.88	McDonald's	Holiday, FL	Yes	Fast Food	
1467	1194	HA	Sunday, August 22, 2010	\$43.58	Angelo's Pizzeria	Holiday, FL	Yes	Restaurant	
1468	1195	KS	Sunday, August 22, 2010	\$48.13	Office Depot	Palm Harbor, FL	Yes	Home Improvement	Changed from Home Depot in Holiday to Office Depot in Palm Harbor.
1470	1196	HA	Sunday, August 22, 2010	\$16.57	Home Depot	Holiday, FL	Yes	Home Improvement	Changed Palm Harbor, FL to Holiday, FL
1471	1197	LF	Monday, August 23, 2010	\$28.50	Pat's Pizzeria	Glen Mills, PA	Yes	Restaurant	
1472	1198	HA	Monday, August 23, 2010	\$80.88	Senor Loco	Clearwater, FL	Yes	Restaurant	
1473	1199	HA	Tuesday, August 24, 2010	\$74.54	Alfano's Restaurant	Clearwater, FL	Yes	Restaurant	
1474	1200	LF	Tuesday, August 24, 2010	\$42.66	CVS	Glen Mills, PA	Yes	Pharmacy	
1475	1201	LF	Tuesday, August 24, 2010	\$12.45	Wawa	Concordville, PA	Yes	Gas Station/Store	
1476	1202	HA	Wednesday, August 25, 2010	\$166.87	Holiday Cleaners	Holiday, FL	Yes	Dry Cleaner	
1477	1203	LF	Wednesday, August 25, 2010	\$30.20	Olive Garden	Talleyville, DE	Yes	Restaurant	
1478	1204	LF	Wednesday, August 25, 2010	\$48.20	Pickles Plus Too	Clearwater, FL	Yes	Restaurant	
1479	1205	HA	Friday, August 27, 2010	\$16.82	Pertinis	Clearwater, FL	Yes	Restaurant	
1480	1206	HA	Saturday, August 28, 2010	\$30.29	Angelo's Pizzeria	Holiday, FL	Yes	Restaurant	
1481	1207	HA	Saturday, August 28, 2010	\$89.85	Home Depot	Holiday, FL	Yes	Home Improvement	
1482	1208	HA	Saturday, August 28, 2010	\$357.37	Home Depot	Holiday, FL	Yes	Home Improvement	
1483	1209	HA	Sunday, August 29, 2010	\$10.77	McDonald's	Holiday, FL	Yes	Fast Food	
1484	1210	HA	Sunday, August 29, 2010	\$103.44	Outback	Trinity, FL	Yes	Restaurant	
1485	1211	HA	Monday, August 30, 2010	\$26.34	Pickles Plus Too	Clearwater, FL	Yes	Restaurant	
1486	1212	HA	Wednesday, September 01, 2010	\$13.22	Backwaters on Sand	Clearwater Beach, FL	Yes	Rental Cars	
1487	1213	LF	Thursday, September 02, 2010	\$27.50	Cumberland Farms	Wilmington, DE	Yes	Gas Station/Store	
1488	1214	HA	Friday, September 03, 2010	\$192.19	Casalduvico	Palm Harbor, FL	Yes	Restaurant	
1489	1215	HA	Friday, September 03, 2010	\$76.58	Lowe's	Clearwater, FL	Yes	Home Improvement	
1490	1216	HA	Friday, September 03, 2010	\$49.59	Marathon Petroleum	Tarpon Springs, FL	Yes	Gas Station/Store	
1491	1217	LF	Friday, September 03, 2010	\$649.00	Rockhurst University	online	Yes	Other	
1492	1218	HA	Saturday, September 04, 2010	\$89.13	Cody's Original Roadhouse	Clearwater, FL	Yes	Restaurant	Changed Tarpon Springs, FL to Clearwater, FL
1493	1219	HA	Saturday, September 04, 2010	\$9.60	McDonald's	Holiday, FL	Yes	Fast Food	
1494	1220	HA	Saturday, September 04, 2010	\$15.58	McDonald's	Holiday, FL	Yes	Fast Food	
1495	1221	LF	Saturday, September 04, 2010	\$21.53	Pat's Pizzeria	Glen Mills, PA	Yes	Restaurant	
1496	1222	KS	Sunday, September 05, 2010	\$136.92	Jonny Garlics	Palm Harbor, FL	Yes	Restaurant	
1497	1223	HA	Monday, September 06, 2010	\$3.47	Home Depot	Holiday, FL	Yes	Home Improvement	
1498	1224	HA	Monday, September 06, 2010	\$45.99	Home Depot	Holiday, FL	Yes	Home Improvement	
1499	1225	HA	Tuesday, September 07, 2010	\$54.42	Alfano's Restaurant	Clearwater, FL	Yes	Restaurant	
1500	1226	HA	Tuesday, September 07, 2010	\$1,253.15	Avis Rent A Car	Tampa, FL	Yes	Rental Cars	
1501	1227	LF	Tuesday, September 07, 2010	\$36.03	Tony's Pizzeria	Clearwater, FL	Yes	Restaurant	
1502	1228	HA	Wednesday, September 08, 2010	\$74.88	Angelo's Pizzeria	Holiday, FL	Yes	Restaurant	
1503	1229	HA	Wednesday, September 08, 2010	\$69.98	Holiday Cleaners	Holiday, FL	Yes	Dry Cleaner	
1504	1230	LF	Thursday, September 09, 2010	\$31.50	America Bar & Grill	Glen Mills, PA	Yes	Restaurant	
1505	1231	HA	Friday, September 10, 2010	\$60.17	Angelo's Pizzeria	Holiday, FL	Yes	Restaurant	
1506	1232	HA	Friday, September 10, 2010	\$574.05	Lowe's	Clearwater, FL	Yes	Home Improvement	
1507	1233	KS	Friday, September 10, 2010	\$47.19	Pickles Plus Too	Clearwater, FL	Yes	Restaurant	
1508	1234	LF	Friday, September 10, 2010	\$28.30	Shell Oil	Wilmington, DE	Yes	Gas Station/Store	

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1509	1235	LF	Friday, September 10, 2010	\$5.99	Taco Bell	Middletown, DE	Yes	Fast Food	
1510	1236	HA	Friday, September 10, 2010	\$18.75	TGI Fridays	Tampa, FL	Yes	Restaurant	
1511	1237	HA	Saturday, September 11, 2010	\$39.78	CVS	Holiday, FL	Yes	Pharmacy	
1512	1238	LF	Saturday, September 11, 2010	\$475.00	Discovery Company	Shrewsbury, PA	Yes	Merchandise	
1513	1239	HA	Saturday, September 11, 2010	\$97.26	Longhorn Steaks	Port Richey, FL	Yes	Restaurant	
1514	1240	HA	Saturday, September 11, 2010	\$37.71	Newport Mainmart	New Port Richey, FL	Yes	Gas Station/Store	Changed Port Richey, FL to New Port Richey, FL
1515	1241	LF	Sunday, September 12, 2010	\$40.17	Champs	Tampa, FL	Yes	Restaurant	
1516	1242	LF	Sunday, September 12, 2010	\$7.00	Wendy's	Philadelphia, PA	Yes	Fast Food	
1517	1243	KS	Sunday, September 12, 2010	\$50.73	Wing House	Palmdale, FL	Yes	Restaurant	
1518	1244	KS	Monday, September 13, 2010	\$48.88	Alfano's Restaurant	Clearwater, FL	Yes	Restaurant	
1519	1245	LF	Monday, September 13, 2010	\$4.18	McDonald's	Clearwater, FL	Yes	Fast Food	
1520	1246	HA	Monday, September 13, 2010	\$99.28	Rossi Ristorante	New Port Richey, FL	Yes	Restaurant	Changed Port Richey, FL to New Port Richey, FL
1521	1247	HA	Tuesday, September 14, 2010	\$124.85	Cody's Original Roadhouse	Tarpon Springs, FL	Yes	Restaurant	
1522	1248	HA	Tuesday, September 14, 2010	\$67.27	Hollman's Restaurant	Clearwater, FL	Yes	Restaurant	
1523	1249	LF	Tuesday, September 14, 2010	\$62.60	Island way Grill	Clearwater, FL	Yes	Restaurant	
1524	1250	LF	Tuesday, September 14, 2010	\$28.36	Mugs Grill & Bar	Clearwater, FL	Yes	Restaurant	
1525	1251	LF	Tuesday, September 14, 2010	\$16.96	Tony's Pizzeria	Clearwater, FL	Yes	Restaurant	
1526	1252	LF	Tuesday, September 14, 2010	\$16.96	Tony's Pizzeria	Clearwater, FL	Yes	Restaurant	
1527	1253	KS	Tuesday, September 14, 2010	\$263.70	Verizon	online	Yes	Phone	
1528	1254	LF	Tuesday, September 14, 2010	\$17.54	Walgreens	Clearwater, FL	Yes	Pharmacy	
1530	1255	LF	Wednesday, September 15, 2010	\$58.50	Alfano's Restaurant	Clearwater, FL	Yes	Restaurant	
1531	1256	LF	Wednesday, September 15, 2010	\$50.94	Café 421	Clearwater, FL	Yes	Restaurant	
1532	1257	LF	Wednesday, September 15, 2010	\$42.48	Tony's Pizzeria	Clearwater, FL	Yes	Restaurant	
1533	1258	HA	Thursday, September 16, 2010	\$67.71	Sandpearl Carreta	Clearwater Beach, FL	Yes	Hotel	
1534	1259	KS	Friday, September 17, 2010	\$130.18	Eddie's Bar and Grill	Dunedin, FL	Yes	Restaurant	
1535	1260	LF	Friday, September 17, 2010	\$11.76	Giant Oil	Clearwater, FL	Yes	Gas Station/Store	
1537	1261	HA	Friday, September 17, 2010	\$43.94	Los Mayas	Clearwater, FL	Yes	Restaurant	
1538	1262	LF	Friday, September 17, 2010	\$164.74	Lowe's	Clearwater, FL	Yes	Home Improvement	
1539	1263	HA	Friday, September 17, 2010	\$39.66	Shell Oil	Clearwater, FL	Yes	Gas Station/Store	
1540	1264	LF	Friday, September 17, 2010	\$7.58	Starbucks	Tampa, FL	Yes	Fast Food	
1541	1265	HA	Saturday, September 18, 2010	\$64.45	Angelo's Pizza	Holiday, FL	Yes	Restaurant	
1542	1266	LF	Monday, September 20, 2010	\$56.01	Bertucci's	Glen Mills, PA	Yes	Restaurant	
1543	1267	HA	Monday, September 20, 2010	\$9.29	McDonald's	Holiday, FL	Yes	Fast Food	
1545	1268	LF	Monday, September 20, 2010	\$81.96	The Landing	Philadelphia, PA	Yes	Restaurant	
1546	1269	LF	Tuesday, September 21, 2010	\$24.81	Paradise	Philadelphia, PA	Yes	Merchandise	
1551	1270	LF	Tuesday, September 21, 2010	\$51.89	Walgreens	Clearwater, FL	Yes	Pharmacy	
1552	1271	KS	Wednesday, September 22, 2010	\$17.06	DD/BB	Palm Harbor, FL	Yes	Fast Food	
1553	1272	LF	Wednesday, September 22, 2010	\$194.69	Hilton Philadelphia	Philadelphia, PA	Yes	Hotel	
1555	1273	LF	Wednesday, September 22, 2010	\$25.58	Starbucks	Clearwater, FL	Yes	Fast Food	
1556	1274	HA	Wednesday, September 22, 2010	\$460.01	The Black Pearl	Dunedin, FL	Yes	Restaurant	
1557	1275	LF	Wednesday, September 22, 2010	\$147.14	Tony's Pizzeria	Clearwater, FL	Yes	Restaurant	
1558	1276	LF	Thursday, September 23, 2010	\$69.00	Ann Taylor	Clearwater, FL	Yes	Merchandise	
1560	1277	LF	Thursday, September 23, 2010	\$40.48	CVS	Clearwater, FL	Yes	Pharmacy	
1561	1278	LF	Thursday, September 23, 2010	\$174.84	Dillard's Dept. Store	Clearwater, FL	Yes	Department Store	
1562	1279	HA	Thursday, September 23, 2010	\$6.61	McDonald's	Holiday, FL	Yes	Fast Food	
1564	1280	HA	Thursday, September 23, 2010	\$30.77	Sunoco	Clearwater, FL	Yes	Gas Station/Store	
1565	1281	LF	Thursday, September 23, 2010	\$191.43	TIMAX	Clearwater, FL	Yes	Merchandise	
1566	1282	HA	Friday, September 24, 2010	\$2,083.33	Avis Rent A Car	Tampa, FL	Yes	Rental Cars	
1568	1283	HA	Friday, September 24, 2010	\$28.18	Wawa	Chadds Ford, PA	Yes	Gas Station/Store	
1569	1284	HA	Saturday, September 25, 2010	\$43.86	Best Buy	Paramus, NJ	Yes	Merchandise	
1570	1285	HA	Saturday, September 25, 2010	\$24.58	Century Twenty One	Paramus, NJ	Yes	Other	
1571	1286	KS	Saturday, September 25, 2010	\$28.00	Golden Eagle Diner	Palisades Park, NJ	Yes	Restaurant	
1572	1287	HA	Saturday, September 25, 2010	\$10.26	McDonald's	Boothwyn, PA	Yes	Fast Food	
1573	1288	HA	Saturday, September 25, 2010	\$41.82	Sunoco	Cranbury, NJ	Yes	Gas Station/Store	

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1574	1289	LF	Saturday, September 25, 2010	\$11.96	Walgreens	Miami, FL	Yes	Pharmacy	Added location Miami
1575	1290	HA	Sunday, September 26, 2010	\$10.24	Asian Chao	Philadelphia, PA	Yes	Restaurant	
1576	1291	KS	Sunday, September 26, 2010	\$9.83	Sharos	Philadelphia, PA	Yes	Fast Food	
1577	1292	KS	Monday, September 27, 2010	\$78.12	Sea Sea Riders Restaurant	Dunedin, FL	Yes	Restaurant	
1578	1293	HA	Tuesday, September 28, 2010	\$60.17	Angelo's Pizza	Holiday, FL	Yes	Restaurant	
1581	1294	KS	Tuesday, September 28, 2010	\$24.08	Pickles Plus Too	Clearwater, FL	Yes	Restaurant	
1582	1295	KS	Wednesday, September 29, 2010	\$63.08	Alfano's Restaurant	Clearwater, FL	Yes	Restaurant	
1584	1296	HA	Wednesday, September 29, 2010	\$20.25	KFC	New Port Richey, FL	Yes	Fast Food	Changed Port Richey, FL to New Port Richey, FL
1585	1297	KS	Wednesday, September 29, 2010	\$305.46	Sea Sea Riders Restaurant	Dunedin, FL	Yes	Restaurant	
1586	1298	KS	Thursday, September 30, 2010	\$35.40	Chiang Mai	Clearwater, FL	Yes	Restaurant	
1587	1299	HA	Thursday, September 30, 2010	\$39.16	Chili's Grill	Tarpon Springs, FL	Yes	Restaurant	
1588	1300	LF	Thursday, September 30, 2010	\$9.29	Flat Bread	Tampa, FL	Yes	Fast Food	
1589	1301	LF	Thursday, September 30, 2010	\$20.75	Giant Oil	Clearwater, FL	Yes	Fast Food	
1590	1302	HA	Thursday, September 30, 2010	\$7.36	Giant Oil	Clearwater, FL	Yes	Gas Station/Store	
1592	1303	HA	Friday, October 01, 2010	\$63.58	Alfano's Restaurant	Clearwater, FL	Yes	Gas Station/Store	
1593	1304	HA	Friday, October 01, 2010	\$48.41	DD/BR	Clearwater, FL	Yes	Restaurant	
1594	1305	HA	Friday, October 01, 2010	\$9.59	KFC	Palm Harbor, FL	Yes	Fast Food	
1595	1306	HA	Saturday, October 02, 2010	\$37.27	Holiday Chgo	New Port Richey, FL	Yes	Fast Food	Changed Port Richey, FL to New Port Richey, FL
1596	1307	HA	Saturday, October 02, 2010	\$15.16	Sweetday	Holiday, FL	Yes	Gas Station/Store	
1597	1308	HA	Sunday, October 03, 2010	\$7.44	DD/BR	Holiday, FL	Yes	Grocery	
1598	1309	HA	Sunday, October 03, 2010	\$45.04	Rainbow 50's Diner	New Port Richey, FL	Yes	Fast Food	Changed Port Richey, FL to New Port Richey, FL
1599	1310	HA	Monday, October 04, 2010	\$35.65	7-Eleven	Holiday, FL	Yes	Restaurant	
1600	1311	HA	Monday, October 04, 2010	\$51.58	Alfano's Restaurant	Clearwater, FL	Yes	Gas Station/Store	
1601	1312	HA	Monday, October 04, 2010	\$17.57	Angelo's Pizza	Holiday, FL	Yes	Restaurant	
1602	1313	LF	Monday, October 04, 2010	\$10.01	Dunkin Donuts	Chadds Ford, PA	Yes	Restaurant	
1603	1314	LF	Monday, October 04, 2010	\$24.38	Pat's Pizzeria	Glen Mills, PA	Yes	Fast Food	
1604	1315	HA	Monday, October 04, 2010	\$201.16	Tri-County Locksmith	Hudson, FL	Yes	Restaurant	
1607	1316	LF	Monday, October 04, 2010	\$8.51	Wawa	Middletown, DE	Yes	Other	
1609	1317	KS	Wednesday, October 06, 2010	\$26.22	Pickles Plus Too	Clearwater, FL	Yes	Gas Station/Store	
1610	1318	HA	Thursday, October 07, 2010	\$22.10	Pickles Plus Too	Clearwater, FL	Yes	Restaurant	
1611	1319	HA	Sunday, October 10, 2010	\$89.67	Cody's Original Roadhouse	Tarpon Springs, FL	Yes	Restaurant	
1612	1320	LF	Sunday, October 10, 2010	\$2.79	Dunkin Donuts	Philadelphia, PA	Yes	Fast Food	
1613	1321	HA	Sunday, October 10, 2010	\$9.59	Home Depot	Holiday, FL	Yes	Home Improvement	Changed \$9.95 to \$9.59
1614	1322	LF	Sunday, October 10, 2010	\$17.06	Okeefe's	Clearwater, FL	Yes	Restaurant	
1615	1323	HA	Sunday, October 10, 2010	\$17.00	Rainbow 50's Diner	Holiday, FL	Yes	Restaurant	
1616	1324	LF	Sunday, October 10, 2010	\$27.78	Wawa	Middletown, DE	Yes	Gas Station/Store	
1617	1325	HA	Monday, October 11, 2010	\$56.22	Angelo's Pizza	Holiday, FL	Yes	Restaurant	
1618	1326	LF	Monday, October 11, 2010	\$78.62	Bonerfish	Clearwater, FL	Yes	Restaurant	
1620	1327	KS	Monday, October 11, 2010	\$38.72	Pickles Plus Too	Clearwater, FL	Yes	Restaurant	
1622	1328	LF	Tuesday, October 12, 2010	\$24.71	Publix	Clearwater, FL	Yes	Grocery	
1626	1329	HA	Thursday, October 14, 2010	\$32.45	7-Eleven	Clearwater, FL	Yes	Gas Station/Store	
1627	1330	LF	Thursday, October 14, 2010	\$59.72	Alfano's Restaurant	Clearwater, FL	Yes	Restaurant	
1628	1331	HA	Thursday, October 14, 2010	\$95.77	Hellman's Restaurant	Clearwater, FL	Yes	Restaurant	
1629	1332	LF	Thursday, October 14, 2010	\$3.62	Monie Southwest Grill	Clearwater, FL	Yes	Fast Food	
1631	1333	LF	Thursday, October 14, 2010	\$200.04	Target	Clearwater, FL	Yes	Merchandise	
1635	1334	LF	Friday, October 15, 2010	\$6.28	Starbucks	Clearwater, FL	Yes	Fast Food	
1636	1335	LF	Friday, October 15, 2010	\$78.35	Stoneflame Grill	Oldsmar, FL	Yes	Restaurant	
1637	1336	KS	Friday, October 15, 2010	\$155.92	Tilted Kilt	Oldsmar, FL	Yes	Restaurant	
1638	1337	LF	Saturday, October 16, 2010	\$5.10	DD/BR	Oldsmar, FL	Yes	Fast Food	
1639	1338	LF	Saturday, October 16, 2010	\$106.99	Kohl's	Clearwater, FL	Yes	Merchandise	
1641	1339	LF	Sunday, October 17, 2010	\$10.57	Boston Market	Clearwater, FL	Yes	Restaurant	
1642	1340	KS	Sunday, October 17, 2010	\$37.52	Maggiolo's	Tampa, FL	Yes	Restaurant	
1643	1341	LF	Sunday, October 17, 2010	\$100.08	Walgreens	Clearwater, FL	Yes	Pharmacy	
1663	1342	LF	Sunday, October 24, 2010	\$13.59	Ruth's Hallmark (Gift Items)	Philadelphia, PA	Yes	Restaurant	

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1666	1343	LF	Monday, October 25, 2010	\$422.40	U.S. Airways (Ticket for Andrew Paragiv)	Phoenix, AZ	Yes	Air	
1667	1344	LF	Monday, October 25, 2010	\$254.40	U.S. Airways (Ticket for Jennifer Care)	Phoenix, AZ	Yes	Air	
1668	1345	LF	Monday, October 25, 2010	\$254.40	U.S. Airways (Ticket for Paulina Korecka)	Phoenix, AZ	Yes	Air	
1671	1346	HA	Thursday, October 28, 2010	\$19.21	Angelo's Pizza	Holiday, FL	Yes	Restaurant	
1672	1347	HA	Friday, October 29, 2010	\$60.17	Angelo's Pizza	Holiday, FL	Yes	Restaurant	
1673	1348	LF	Friday, October 29, 2010	\$20.01	DD/BR	Clearwater, FL	Yes	Fast Food	
1674	1349	HA	Friday, October 29, 2010	\$41.84	Holiday Cltgo	Holiday, FL	Yes	Gas Station/Store	
1675	1350	HA	Friday, October 29, 2010	\$98.00	Primitime Limousine	Holiday, FL	Yes	Transportation	Changed Primitime Cltgo to Primitime Limousine, changed Gas Station/Store to Transportation
1676	1351	HA	Saturday, October 30, 2010	\$53.46	Alside F Gifts	Tampa, FL	Yes	Merchandise	
1677	1352	HA	Saturday, October 30, 2010	\$2,817.79	Avis Rent A Car	Tampa, FL	Yes	Rental Cars	
1678	1353	LF	Saturday, October 30, 2010	\$59.75	Giant Food	Middletown, DE	Yes	Grocery	
1680	1354	LF	Monday, November 01, 2010	\$6.41	McDonald's	Clearwater, FL	Yes	Fast Food	
1682	1355	HA	Monday, November 01, 2010	\$95.48	Pescatore's Italian	Glen Mills, PA	Yes	Restaurant	
1683	1356	KS	Tuesday, November 02, 2010	\$76.29	Airbev, Inc.	Jamaica, NY	Yes	Fast Food	
1685	1357	KS	Tuesday, November 02, 2010	\$52.74	Pickles Plus Too	Clearwater, FL	Yes	Restaurant	
1688	1358	KS	Wednesday, November 03, 2010	\$44.05	KFC	Palm Harbor, FL	Yes	Fast Food	
1690	1359	KS	Thursday, November 04, 2010	\$39.98	Alfano's Restaurant	Clearwater, FL	Yes	Restaurant	
1696	1360	LF	Friday, November 05, 2010	\$3.86	Giant Oil	Clearwater, FL	Yes	Gas Station/Store	
1698	1361	LF	Sunday, November 07, 2010	\$14.90	Paradise	Philadelphia, PA	Yes	Merchandise	
1700	1362	LF	Monday, November 08, 2010	\$320.99	GulfairCenter.com	Oregon	Yes	Merchandise	
1701	1363	HA	Monday, November 08, 2010	\$52.43	Pescatore's Italian	Glen Mills, PA	Yes	Restaurant	
1703	1364	HA	Tuesday, November 09, 2010	\$23.53	Best Buy	Paramus, NJ	Yes	Merchandise	
1705	1365	HA	Tuesday, November 09, 2010	\$48.26	Lukeoil	Mt. Laurel, NJ	Yes	Gas Station/Store	
1707	1366	LF	Wednesday, November 10, 2010	\$28.70	Cumberland Farms	Claymont, DE	Yes	Gas Station/Store	
1708	1367	HA	Thursday, November 11, 2010	\$8.67	ACME	Glen Mills, PA	Yes	Grocery	
1711	1368	HA	Thursday, November 11, 2010	\$31.27	Paradise	Philadelphia, PA	Yes	Merchandise	
1714	1369	LF	Friday, November 12, 2010	\$39.78	Bertucci's	Glen Mills, PA	Yes	Restaurant	
1715	1370	LF	Friday, November 12, 2010	\$39.99	Bestbuy.com	Wilmington, DE	Yes	Merchandise	
1716	1371	LF	Friday, November 12, 2010	\$239.99	Bestbuy.com	Wilmington, DE	Yes	Merchandise	
1718	1372	KS	Saturday, November 13, 2010	\$390.97	CVS	Holiday, FL	Yes	Pharmacy	
1721	1373	KS	Sunday, November 14, 2010	\$116.95	Crate & Barrel	Tampa, FL	Yes	Merchandise	
1722	1374	LF	Sunday, November 14, 2010	\$85.10	Walgreens	Middletown, DE	Yes	Pharmacy	
1723	1375	LF	Monday, November 15, 2010	\$42.37	Ace Hardware Outlet	New York, NY	Yes	Home Improvement	
1729	1376	KS	Thursday, November 18, 2010	\$3.20	McDonald's	Holiday, FL	Yes	Fast Food	
1733	1377	HA	Sunday, November 21, 2010	\$40.45	Angelo's Pizza	Holiday, FL	Yes	Restaurant	
1736	1378	KS	Monday, November 22, 2010	\$36.99	Alfano's Restaurant	Clearwater, FL	Yes	Restaurant	
1737	1379	LF	Monday, November 22, 2010	\$100.37	Bath & Body Works	King of Prussia, PA	Yes	Merchandise	
1738	1380	LF	Monday, November 22, 2010	\$31.68	Pat's Pizzeria	Glen Mills, PA	Yes	Restaurant	
1739	1381	KS	Monday, November 22, 2010	\$113.99	Verizon	online	Yes	Phone	
1740	1382	LF	Tuesday, November 23, 2010	\$216.11	Oriental Trading Co	online	Yes	Merchandise	
1741	1383	HA	Wednesday, November 24, 2010	\$170.69	Angelo's Pizza	Holiday, FL	Yes	Restaurant	
1742	1384	HA	Wednesday, November 24, 2010	\$45.65	Shell Oil	Palm Harbor, FL	Yes	Gas Station/Store	
1743	1385	HA	Saturday, November 27, 2010	\$37.13	Home Depot	Holiday, FL	Yes	Home Improvement	
1744	1386	HA	Saturday, November 27, 2010	\$70.38	Home Depot	Holiday, FL	Yes	Home Improvement	
1745	1387	HA	Sunday, November 28, 2010	\$59.65	Angelo's Pizza	Holiday, FL	Yes	Restaurant	
1746	1388	KS	Sunday, November 28, 2010	\$1,834.90	Best Buy	Clearwater, FL	Yes	Merchandise	
1747	1389	HA	Sunday, November 28, 2010	\$13.94	Home Depot	Holiday, FL	Yes	Home Improvement	
1748	1390	HA	Monday, November 29, 2010	\$5.43	7-Eleven	New Port Richey, FL	Yes	Gas Station/Store	
1749	1391	HA	Monday, November 29, 2010	\$22.61	Hess	Clearwater, FL	Yes	Gas Station/Store	
1750	1392	LF	Monday, November 29, 2010	\$7.72	Hudson News	Philadelphia, PA	Yes	Merchandise	
1751	1393	HA	Monday, November 29, 2010	\$370.22	Landry's Seafood	Tampa, FL	Yes	Restaurant	
1752	1394	LF	Monday, November 29, 2010	\$5.07	Maki of Japan	Philadelphia, PA	Yes	Restaurant	

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1756	1395	HA	Tuesday, November 30, 2010	\$401.17	Casanova Restaurant	Clearwater, FL	Yes	Restaurant	
1757	1396	LF	Tuesday, November 30, 2010	\$185.60	Crabby's Beachwalk	Clearwater, FL	Yes	Restaurant	
1759	1397	HA	Tuesday, November 30, 2010	\$20.83	Perkins	Clearwater, FL	Yes	Restaurant	
1760	1398	LF	Tuesday, November 30, 2010	\$27.14	Supershuttle	St. Petersburg FL	Yes	Transport	
1761	1399	HA	Tuesday, November 30, 2010	\$532.96	Thrifty Car Rental	Tampa, FL	Yes	Rental Cars	
1762	1400	KS	Tuesday, November 30, 2010	\$659.28	Verizon	Clearwater, FL	Yes	Phone	
1763	1401	LF	Tuesday, November 30, 2010	\$42.82	Walgreens	Clearwater, FL	Yes	Pharmacy	
1765	1402	HA	Wednesday, December 01, 2010	\$583.64	Casanova Restaurant	Clearwater, FL	Yes	Restaurant	
1766	1403	LF	Wednesday, December 01, 2010	\$138.00	Clear Sky Beachside	Clearwater, FL	Yes	Restaurant	
1767	1404	LF	Wednesday, December 01, 2010	\$44.93	DO/BR	Clearwater, FL	Yes	Fast Food	
1768	1405	HA	Wednesday, December 01, 2010	\$69.53	Home Depot	Holiday, FL	Yes	Home Improvement	
1771	1406	LF	Wednesday, December 01, 2010	\$47.09	Smoley Bones	Clearwater, FL	Yes	Restaurant	
1772	1407	LF	Wednesday, December 01, 2010	\$189.89	The Brown Boxer Pub	Clearwater, FL	Yes	Restaurant	
1774	1408	LF	Thursday, December 02, 2010	\$425.86	Home Depot	Clearwater, FL	Yes	Home Improvement	
1775	1409	LF	Thursday, December 02, 2010	\$61.45	Pickels Plus Too	Clearwater, FL	Yes	Restaurant	
1776	1410	LF	Thursday, December 02, 2010	\$269.92	Pickels Plus Too	Clearwater, FL	Yes	Restaurant	
1777	1411	LF	Thursday, December 02, 2010	\$13.59	Starbucks	Clearwater, FL	Yes	Fast Food	
1778	1412	HA	Thursday, December 02, 2010	\$501.19	The Black Pearl	Dunedin, FL	Yes	Restaurant	
1780	1413	LF	Friday, December 03, 2010	\$277.08	TLP Jennie's Flowers	Tampa, FL	Yes	Flowers	
1781	1414	HA	Monday, December 06, 2010	\$43.22	Airside F Gifts	Tampa, FL	Yes	Merchandise	
1782	1415	HA	Monday, December 06, 2010	\$536.82	Avis Rent A Car	Tampa, FL	Yes	Rental Cars	
1783	1416	KS	Monday, December 06, 2010	\$1,017.50	Enterprise Rentacar	Tarpon Springs, FL	Yes	Rental Cars	
1784	1417	KS	Monday, December 06, 2010	\$1,108.80	Enterprise Rentacar	Tarpon Springs, FL	Yes	Rental Cars	
1785	1418	LF	Monday, December 06, 2010	\$26.38	Kennedy BP	Tampa, FL	Yes	Gas Station/Store	
1786	1419	LF	Monday, December 06, 2010	\$6.53	Starbucks	Tampa, FL	Yes	Fast Food	
1787	1420	HA	Monday, December 06, 2010	\$6.56	Sunoco	Clearwater, FL	Yes	Gas Station/Store	
1788	1421	HA	Monday, December 06, 2010	\$79.42	Wawa	Chadds Ford, PA	Yes	Gas Station/Store	
1789	1422	HA	Tuesday, December 07, 2010	\$43.29	Pescatores Italian	Glen Mills, PA	Yes	Restaurant	
1790	1423	HA	Wednesday, December 08, 2010	\$154.90	Harry's Savoy Grill	Wilmington, DE	Yes	Restaurant	
1791	1424	HA	Wednesday, December 08, 2010	\$25.83	Pappones Pizza	Media, PA	Yes	Restaurant	
1792	1425	KS	Thursday, December 09, 2010	\$23.46	Friendly's Ice Cream	West Chester, PA	Yes	Restaurant	
1793	1426	KS	Thursday, December 09, 2010	\$48.67	Lukeoil	Mt. Laurel, NJ	Yes	Gas Station/Store	
1794	1427	KS	Thursday, December 09, 2010	\$81.84	Wawa	Chadds Ford, PA	Yes	Gas Station/Store	
1795	1428	HA	Friday, December 10, 2010	\$52.30	Median Post	Wilmington, DE	Yes	Restaurant	
1799	1429	HA	Monday, December 13, 2010	\$30.36	Pescatores Italian	Glen Mills, PA	Yes	Restaurant	
1800	1430	HA	Tuesday, December 14, 2010	\$35.00	TGI Fridays	West Chester, PA	Yes	Restaurant	
1801	1431	HA	Thursday, December 16, 2010	\$8.89	McDonald's	Concordville, PA	Yes	Fast Food	
1803	1432	KS	Thursday, December 16, 2010	\$127.21	Verizon	online	Yes	Phone	
1804	1433	HA	Saturday, December 18, 2010	\$117.18	Harvest	Glen Mills, PA	Yes	Restaurant	
1805	1434	HA	Sunday, December 19, 2010	\$129.96	Pescatores Italian	Glen Mills, PA	Yes	Restaurant	
1806	1435	HA	Monday, December 20, 2010	\$45.92	Pescatores Italian	Glen Mills, PA	Yes	Restaurant	
1808	1436	LF	Wednesday, December 22, 2010	\$13.40	Chick-Fil-A	Glen Mills, PA	Yes	Fast Food	
1809	1437	HA	Wednesday, December 22, 2010	\$44.44	Macaroni Grill	Wilmington, DE	Yes	Restaurant	
1810	1438	LF	Thursday, December 23, 2010	\$284.39	Boston Market	Talleville, DE	Yes	Restaurant	
1811	1439	HA	Tuesday, November 23, 2010	\$499.27	Casalubovico	Palm Harbor, FL	Yes	Restaurant	Changed Thursday, December 23, 2010 to Tuesday, November 23, 2010.
1812	1440	LF	Thursday, December 23, 2010	\$90.20	CVS	West Chester, PA	Yes	Pharmacy	
1813	1441	HA	Thursday, December 23, 2010	\$370.70	Harry's Savoy Grill	Wilmington, DE	Yes	Restaurant	
1814	1442	HA	Tuesday, November 23, 2010	\$36.17	Holiday Clago	Holiday, FL	Yes	Gas Station/Store	Changed Thursday, December 23, 2010 to Tuesday, November 23, 2010.
1816	1443	LF	Thursday, December 30, 2010	\$28.91	Ruby's Diner	Glen Mills, PA	Yes	Restaurant	
1817	1444	HA	Friday, December 31, 2010	\$247.78	Bisteca Fiorentina	New York, NY	Yes	Restaurant	
1818	1445	HA	Friday, December 31, 2010	\$127.65	Genjardis Store - Grocery	Wilmington, DE	Yes	Grocery	
1819	1446	HA	Tuesday, January 04, 2011	\$82.24	Pescatores Italian	Glen Mills, PA	Yes	Restaurant	

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1821	1447	HA	Friday, January 07, 2011	\$47.59	Asian Kitchen	Ridgefield, CT	Yes	Restaurant	
1822	1448	HA	Friday, January 07, 2011	\$44.04	Bernards	Ridgefield, CT	Yes	Restaurant	
1823	1449	LF	Friday, January 07, 2011	\$17.98	Dunkin Donuts	Concordville, PA	Yes	Fast Food	
1824	1450	LF	Friday, January 07, 2011	\$34.97	Pat's Pizzeria	Glen Mills, PA	Yes	Restaurant	
1825	1451	HA	Saturday, January 08, 2011	\$174.86	Best Buy	Danbury, CT	Yes	Merchandise	
1826	1452	HA	Sunday, January 09, 2011	\$56.38	Lululemon	Mt. Laurel, NJ	Yes	Gas Station/Store	Changed Laurel, NJ to Mt. Laurel, NJ
1827	1453	HA	Monday, January 10, 2011	\$70.30	Bertucci's	Glen Mills, PA	Yes	Restaurant	
1828	1454	HA	Monday, January 10, 2011	\$45.06	Pescatore's Italian	Glen Mills, PA	Yes	Restaurant	
1829	1455	HA	Monday, January 10, 2011	\$27.06	WAWA Gas Station/Store/Store	Concordville, PA	Yes	Gas Station/Store	
1830	1456	LF	Tuesday, January 11, 2011	\$23.97	Dunkin Donuts	Chadds Ford, PA	Yes	Fast Food	Changed Chadds Ford, PA to Concordville, PA
1831	1457	HA	Tuesday, January 11, 2011	\$50.35	Home Depot	Glen Mills, PA	Yes	Home Improvement	
1832	1458	HA	Tuesday, January 11, 2011	\$47.60	HoneyBaked Ham	Glen Mills, PA	Yes	Restaurant	
1833	1459	HA	Tuesday, January 11, 2011	\$28.61	Ruby's Diner	Glen Mills, PA	Yes	Restaurant	
1834	1460	HA	Wednesday, January 12, 2011	\$297.27	Dilworthtown Inn	West Chester, PA	Yes	Restaurant	
1835	1461	HA	Wednesday, January 12, 2011	\$51.33	Pescatore's Italian	Glen Mills, PA	Yes	Restaurant	
1836	1462	HA	Thursday, January 13, 2011	\$22.84	WAWA Gas Station/Store/Store	Concordville, PA	Yes	Gas Station/Store	
1837	1463	HA	Friday, January 14, 2011	\$347.42	Millie High Steak & Seafood	Glen Mills, PA	Yes	Restaurant	
1838	1464	HA	Friday, January 14, 2011	\$43.36	Pescatore's Italian	Glen Mills, PA	Yes	Restaurant	
1839	1465	HA	Saturday, January 15, 2011	\$17.92	WAWA Gas Station/Store/Store	Chadds Ford, PA	Yes	Gas Station/Store	
1840	1466	KS	Sunday, January 16, 2011	\$55.37	Cody's Original Roadhouse	Tarpon Springs, FL	Yes	Restaurant	
1841	1467	LF	Monday, January 17, 2011	\$62.61	Pickles Plus Too	Clearwater, FL	Yes	Restaurant	
1843	1468	KS	Monday, January 17, 2011	\$127.55	Verizon	online	Yes	Phone	
1844	1469	HA	Monday, January 17, 2011	\$7.52	WAWA Gas Station/Store/Store	Chadds Ford, PA	Yes	Gas Station/Store	
1846	1470	HA	Tuesday, January 18, 2011	\$97.80	Pescatore's Italian	Glen Mills, PA	Yes	Restaurant	
1848	1471	HA	Wednesday, January 19, 2011	\$162.68	Casabonco	Palin Harbor, FL	Yes	Restaurant	Changed date from 1/20/2013 to 1/20/2010
1849	1472	HA	Thursday, January 20, 2011	\$23.49	Chadds Ford Diner	Chadds Ford, PA	Yes	Restaurant	
1850	1473	HA	Thursday, January 20, 2011	\$180.70	Charlie Brown's	Springfield, PA	Yes	Restaurant	
1851	1474	HA	Thursday, January 20, 2011	\$18.18	CVS	Ridley Park, PA	Yes	Pharmacy	
1852	1475	HA	Friday, January 21, 2011	\$99.41	Pescatore's Italian	Glen Mills, PA	Yes	Restaurant	
1853	1476	LF	Friday, January 21, 2011	\$140.85	Pickles Plus Too	Clearwater, FL	Yes	Restaurant	
1854	1477	HA	Friday, January 21, 2011	\$112.87	Target	Berwyn, PA	Yes	Merchandise	
1855	1478	HA	Sunday, January 23, 2011	\$113.97	Best Buy	Wilmington, DE	Yes	Merchandise	
1856	1479	HA	Monday, January 24, 2011	\$55.32	Cody's Original Roadhouse	Clearwater, FL	Yes	Restaurant	Changed Tarpon Springs, FL to Clearwater, FL
1857	1480	HA	Monday, January 24, 2011	\$30.17	Ruby's Diner	Glen Mills, PA	Yes	Restaurant	
1858	1481	HA	Tuesday, January 25, 2011	\$223.78	Casanova Restaurant	Clearwater, FL	Yes	Restaurant	
1859	1482	HA	Tuesday, January 25, 2011	\$130.29	Ross Restaurant	New Port Richey, FL	Yes	Restaurant	Changed Port Richey to New Port Richey, FL
1860	1483	HA	Wednesday, January 26, 2011	\$7.47	McDonald's	Holiday, FL	Yes	Fast Food	
1861	1484	LF	Friday, January 28, 2011	\$38.62	Pat's Pizzeria	Glen Mills, PA	Yes	Restaurant	
1862	1485	LF	Friday, January 28, 2011	\$32.14	WAWA Gas Station/Store/Store	Middletown, DE	Yes	Gas Station/Store	
1863	1486	HA	Monday, January 31, 2011	\$63.31	Angelo's Pizza	Holiday, FL	Yes	Restaurant	
1864	1487	LF	Monday, January 31, 2011	\$10.10	Café 421	Clearwater, FL	Yes	Restaurant	
1865	1488	LF	Monday, January 31, 2011	\$5.59	Dunkin Donuts	Philadelphia, PA	Yes	Fast Food	
1866	1489	LF	Monday, January 31, 2011	\$11.85	Paradise (cards & souvenir store)	Philadelphia, PA	Yes	Merchandise	
1867	1490	HA	Monday, January 31, 2011	\$29.59	Psghettis (food)	Clearwater, FL	Yes	Restaurant	
1868	1491	HA	Monday, January 31, 2011	\$91.86	Psghettis (food)	Clearwater, FL	Yes	Restaurant	
1871	1492	HA	Wednesday, February 02, 2011	\$56.18	Alfonso Restaurant	Clearwater, FL	Yes	Restaurant	
1873	1493	LF	Thursday, February 03, 2011	\$13.91	Okeefe's	Clearwater, FL	Yes	Restaurant	
1874	1494	HA	Friday, February 04, 2011	\$80.51	Cody's Original Roadhouse	Tarpon Springs, FL	Yes	Restaurant	
1875	1495	LF	Friday, February 04, 2011	\$4.12	Giant Oil	Clearwater, FL	Yes	Gas Station/Store	
1876	1496	HA	Friday, February 04, 2011	\$103.50	Johnson Lipman	Coconut Creek, FL	Yes	other	
1877	1497	HA	Friday, February 04, 2011	\$7.67	McDonald's	Holiday, FL	Yes	Fast Food	
1878	1498	HA	Friday, February 04, 2011	\$47.83	Psghettis (food)	Clearwater, FL	Yes	Restaurant	
1879	1499	HA	Saturday, February 05, 2011	\$32.44	McDonald's	Holiday, FL	Yes	Fast Food	
1880	1500	HA	Sunday, February 06, 2011	\$485.51	Thrifty Car Rental	Tampa, FL	Yes	Rental Cars	

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1882	1501	HA	Monday, February 07, 2011	\$12.62	TGI Fridays	West Chester, PA	Yes	Restaurant	
1883	1502	LF	Tuesday, February 08, 2011	\$58.59	Bertucci's	Glen Mills, PA	Yes	Restaurant	
1884	1503	HA	Tuesday, February 08, 2011	\$170.98	Best Buy	Wilmington, DE	Yes	Merchandise	
1886	1504	HA	Tuesday, February 08, 2011	\$26.28	Lone Star	Wilmington, DE	Yes	Restaurant	
1887	1505	HA	Wednesday, February 09, 2011	\$35.06	Pescatore's Italian	Glen Mills, PA	Yes	Restaurant	
1888	1506	LF	Thursday, February 10, 2011	\$122.52	Panera Bread	Wilmington, DE	Yes	Restaurant	
1890	1507	HA	Friday, February 11, 2011	\$31.76	Red Robin	Wilmington, DE	Yes	Restaurant	
1891	1508	HA	Sunday, February 13, 2011	\$69.45	Angelo's Pizza	Holiday, FL	Yes	Restaurant	
1892	1509	LF	Sunday, February 13, 2011	\$11.74	Parades (cards & souvenir store)	Philadelphia, PA	Yes	Merchandise	
1893	1510	LF	Monday, February 14, 2011	\$79.98	1-800-Flowers.com	online	Yes	Flowers	
1895	1511	LF	Tuesday, February 15, 2011	\$25.87	Café 421	Clearwater, FL	Yes	Restaurant	
1896	1512	LF	Tuesday, February 15, 2011	\$100.35	Kellys	Dunedin, FL	Yes	Restaurant	
1897	1513	HA	Tuesday, February 15, 2011	\$5.97	McDonald's	Holiday, FL	Yes	Fast Food	
1898	1514	HA	Tuesday, February 15, 2011	\$25.61	Pickles Plus Too	Clearwater, FL	Yes	Restaurant	
1899	1515	HA	Wednesday, February 16, 2011	\$474.81	Avis Rent A Car	Tampa, FL	Yes	Rental Cars	
1900	1516	LF	Wednesday, February 16, 2011	\$26.03	Los Mayas	Clearwater, FL	Yes	Restaurant	
1901	1517	HA	Wednesday, February 16, 2011	\$33.30	TGI Fridays	Tampa, FL	Yes	Restaurant	
1902	1518	KS	Wednesday, February 16, 2011	\$121.98	Verizon	online	Yes	Phone	Changed NA to Online
1903	1519	HA	Thursday, February 17, 2011	\$47.73	ACME	Glen Mills, PA	Yes	Grocery	
1905	1520	LF	Thursday, February 17, 2011	\$29.36	Pickles Plus Too	Clearwater, FL	Yes	Restaurant	
1907	1521	LF	Friday, February 18, 2011	\$69.50	Concord Pizza	Glen Mills, PA	Yes	Restaurant	
1908	1522	LF	Friday, February 18, 2011	\$8.53	Pickles Plus Too	Clearwater, FL	Yes	Restaurant	
1909	1523	LF	Friday, February 18, 2011	\$301.67	Target	Clearwater, FL	Yes	Merchandise	
1910	1524	HA	Saturday, February 19, 2011	\$153.44	Pescatore's Italian	Glen Mills, PA	Yes	Restaurant	
1911	1525	HA	Monday, February 21, 2011	\$326.00	Acappella No Italian	New York, NY	Yes	Restaurant	
1913	1526	HA	Tuesday, February 22, 2011	\$29.53	Nino's Pizza	Naamans, DE	Yes	Restaurant	
1914	1527	HA	Wednesday, February 23, 2011	\$44.92	Pescatore's Italian	Glen Mills, PA	Yes	Restaurant	
1915	1528	HA	Wednesday, February 23, 2011	\$13.59	WAWA Gas Station/Store	Concordville, PA	Yes	Gas Station/Store	
1916	1529	HA	Thursday, February 24, 2011	\$130.51	Pescatore's Italian	Glen Mills, PA	Yes	Restaurant	
1917	1530	HA	Friday, February 25, 2011	\$7.89	McDonald's	Concordville, PA	Yes	Fast Food	
1918	1531	LF	Friday, February 25, 2011	\$67.81	Pati's Pizzeria	Glen Mills, PA	Yes	Restaurant	
1919	1532	HA	Saturday, February 26, 2011	\$43.49	CVS	Glen Mills, PA	Yes	Pharmacy	
1920	1533	HA	Saturday, February 26, 2011	\$22.38	WAWA Gas Station/Store	Chadds Ford, PA	Yes	Gas Station/Store	
1921	1534	HA	Sunday, February 27, 2011	\$29.44	Ruby's Diner	Glen Mills, PA	Yes	Restaurant	
1923	1535	HA	Monday, February 28, 2011	\$9.45	WAWA Gas Station/Store	Chadds Ford, PA	Yes	Gas Station/Store	
1924	1536	LF	Tuesday, March 01, 2011	\$4.82	McDonald's	Clearwater, FL	Yes	Fast Food	
1925	1537	KS	Tuesday, March 01, 2011	\$188.81	Rossi Ristorante	New Port Richie, FL	Yes	Restaurant	
1926	1538	HA	Tuesday, March 01, 2011	\$94.38	Ruby Tuesday	Wilmington, DE	Yes	Restaurant	Changed Chadds Ford, PA to Wilmington, DE / Changed Ruby's Diner to Ruby Tuesday
1927	1539	LF	Wednesday, March 02, 2011	\$52.35	Alfonso Restaurant	Clearwater, FL	Yes	Restaurant	
1928	1540	HA	Wednesday, March 02, 2011	\$49.99	Best Buy	Wilmington, DE	Yes	Merchandise	
1929	1541	LF	Wednesday, March 02, 2011	\$19.66	Café 421	Clearwater, FL	Yes	Restaurant	
1930	1542	LF	Wednesday, March 02, 2011	\$10.91	Cristino's Brick Oven	Clearwater, FL	Yes	Restaurant	
1931	1543	LF	Wednesday, March 02, 2011	\$39.17	DD/BR	Clearwater, FL	Yes	Fast Food	
1933	1544	HA	Wednesday, March 02, 2011	\$17.77	TGI Fridays	West Chester, PA	Yes	Restaurant	
1934	1545	LF	Thursday, March 03, 2011	\$51.36	Café 421	Clearwater, FL	Yes	Restaurant	
1935	1546	LF	Thursday, March 03, 2011	\$5.98	DD/BR	Clearwater, FL	Yes	Fast Food	
1936	1547	LF	Thursday, March 03, 2011	\$278.29	Pickles Plus Too	Clearwater, FL	Yes	Restaurant	
1937	1548	HA	Thursday, March 03, 2011	\$16.03	Windmill Diner	Danbury, CT	Yes	Restaurant	
1939	1549	LF	Friday, March 04, 2011	\$663.38	Tooby's	Clearwater, FL	Yes	Restaurant	
1940	1550	KS	Saturday, March 05, 2011	\$14.82	Airside A Gifts	Tampa, FL	Yes	Merchandise	Changed Airside F Gifts to Airside A Gifts.
1941	1551	HA	Saturday, March 05, 2011	\$38.58	CVS	Danbury, CT	Yes	Pharmacy	
1942	1552	LF	Saturday, March 05, 2011	\$8.38	Hardees	Middletown, DE	Yes	Fast Food	
1943	1553	HA	Saturday, March 05, 2011	\$198.15	Sagi Cucina Italian	Ridgefield, CT	Yes	Restaurant	

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1944	1554	HA	Sunday, March 06, 2011	\$185.50	Café on the Green	Danbury, CT	Yes	Restaurant	
1945	1555	LF	Sunday, March 06, 2011	\$27.76	WAWA Gas Station/Store/Friendly	Middletown, DE	Yes	Gas Station/Store	
1946	1556	HA	Monday, March 07, 2011	\$67.85		Danbury, CT	Yes	Gas Station/Store	Changed Friendly's Ice Cream to Friendly and changed Restaurant to Gas Station
1947	1557	HA	Monday, March 07, 2011	\$56.32	Pappas Restaurant	Boothwyn, PA	Yes	Restaurant	
1948	1558	LF	Monday, March 07, 2011	\$32.03	Rite Aid	Beer, DE	Yes	Pharmacy	
1949	1559	LF	Tuesday, March 08, 2011	\$30.25	Ruby Tuesday	Wilmington, DE	Yes	Restaurant	Changed Ruby's Diner to Ruby Tuesday and Changed location from Glen Mills, PA to Wilmington, DE
1950	1560	HA	Tuesday, March 08, 2011	\$73.00	Shuttlefare.com	Seybrook, CT	Yes	Transport	
1952	1561	HA	Wednesday, March 09, 2011	\$18.92	Sbarro (food)	Philadelphia, PA	Yes	Fast Food	
1953	1562	HA	Thursday, March 10, 2011	\$147.54	Angelo's Piza	Holiday, FL	Yes	Restaurant	
1954	1563	LF	Thursday, March 10, 2011	\$82.99	BIS Wholesale	Newark, DE	Yes	Grocery	Changed Newark, NJ to Newark, DE
1955	1564	LF	Wednesday, March 10, 2010	\$36.68	Kneast	Beer, DE	Yes	Merchandise	Changed 3/10/11 to 3/10/10
1957	1565	HA	Friday, March 11, 2011	\$56.13	Alfonso Restaurant	Clearwater, FL	Yes	Restaurant	
1958	1566	HA	Sunday, March 13, 2011	\$138.96	Cody's Original Roadhouse	Tarpon Springs, FL	Yes	Restaurant	
1959	1567	HA	Monday, March 14, 2011	\$29.17	Pickles Plus Too	Clearwater, FL	Yes	Restaurant	
1960	1568	LF	Monday, March 14, 2011	\$35.87	Ruby's Diner	Glen Mills, PA	Yes	Restaurant	
1961	1569	HA	Tuesday, March 15, 2011	\$43.34	Pescadores Italian	Glen Mills, PA	Yes	Restaurant	
1962	1570	HA	Tuesday, March 15, 2011	\$17.02	WAWA Gas Station/Store	Concordville, PA	Yes	Gas Station/Store	
1963	1571	HA	Wednesday, March 16, 2011	\$14.99	AT&T	Alpharetta, GA	Yes	Phone	
1964	1572	KS	Wednesday, March 16, 2011	\$22.12	Friendly	West Chester, PA	Yes	Gas Station/Store	Changed Friendly's Ice Cream to Friendly, and changed expense type from Restaurant to Gas Station
1965	1573	HA	Tuesday, March 16, 2010	\$7.67	McDonald's	Holiday, FL	Yes	Fast Food	Changed date from 3/16/2011 to 3/16/2010
1966	1574	LF	Wednesday, March 16, 2011	\$36.02	Pescadores Italian	Glen Mills, PA	Yes	Restaurant	
1969	1575	HA	Wednesday, March 17, 2010	\$7.46	McDonald's	Tarpon Springs, FL	Yes	Fast Food	Changed date from 3/17/2011 to 3/17/2010
1970	1576	HA	Thursday, March 17, 2011	\$254.62	Morton's of Santa (food)	Santa Ana, CA	Yes	Restaurant	
1972	1577	HA	Thursday, March 17, 2011	\$6.36	WAWA Gas Station/Store	West Chester, PA	Yes	Gas Station/Store	
1973	1578	HA	Friday, March 18, 2011	\$9.33	CVS	Costa Mesa, CA	Yes	Pharmacy	
1976	1579	HA	Sunday, March 20, 2011	\$40.97	CVS	Santa Ana, CA	Yes	Pharmacy	
1977	1580	HA	Sunday, March 20, 2011	\$115.70	Houston's	Irvine, CA	Yes	Restaurant	
1978	1581	LF	Tuesday, March 22, 2011	\$21.61	Paradise (Souwest Store)	Orange Co., CA	Yes	Merchandise	Changed Paradise to Parades
1979	1582	HA	Wednesday, March 23, 2011	\$11.81	Paradise (Souwest Store)	Orange Co., CA	Yes	Merchandise	
1980	1583	HA	Wednesday, March 23, 2011	\$13.19	WAWA Gas Station/Store	Chadds Ford, PA	Yes	Gas Station/Store	
1981	1584	HA	Thursday, March 24, 2011	\$12.29	CVS	Glen Mills, PA	Yes	Pharmacy	
1983	1585	HA	Thursday, March 24, 2011	\$69.12	Pescadores Italian	Glen Mills, PA	Yes	Restaurant	
1984	1586	LF	Thursday, March 24, 2011	\$8.96	WAWA Gas Station/Store	Middletown, DE	Yes	Gas Station/Store	
1985	1587	LF	Thursday, March 24, 2011	\$37.33	WAWA Gas Station/Store	Middletown, DE	Yes	Gas Station/Store	
1986	1588	HA	Saturday, March 26, 2011	\$32.98	OTG Management (Fast Food)	Philadelphia, PA	Yes	Fast Food	
1987	1589	HA	Saturday, March 26, 2011	\$85.08	TGI Fridays	Piano, TX	Yes	Restaurant	
1989	1590	HA	Tuesday, March 29, 2011	\$40.36	Pescadores Italian	Glen Mills, PA	Yes	Restaurant	
1990	1591	LF	Tuesday, March 29, 2011	\$57.65	PF Chang's	Glen Mills, PA	Yes	Restaurant	
1991	1592	HA	Wednesday, March 30, 2011	\$12.58	Boston Market	Talleyville, DE	Yes	Restaurant	
1992	1593	HA	Wednesday, March 30, 2011	\$31.28	TGI Fridays	West Chester, PA	Yes	Restaurant	
1993	1594	HA	Thursday, March 31, 2011	\$15.98	Boston Market	Talleyville, DE	Yes	Restaurant	
1994	1595	HA	Thursday, March 31, 2011	\$58.19	Pescadores Italian	Glen Mills, PA	Yes	Restaurant	
1995	1596	HA	Friday, April 01, 2011	\$42.28	Pescadores Italian	Glen Mills, PA	Yes	Restaurant	
1996	1597	LF	Friday, April 01, 2011	\$41.75	Primo Hoagies (restaurant)	Glen Mills, PA	Yes	Restaurant	
1997	1598	HA	Friday, April 01, 2011	\$14.57	Ruby's Diner	Glen Mills, PA	Yes	Restaurant	
1998	1599	LF	Friday, April 01, 2011	\$783.84	Safeguard Self Storage		Yes	Grocery	Changed Safeway Store (Grocery) to Safeguard Self Storage. No location
1999	1600	LF	Saturday, April 02, 2011	\$42.61	Wal-mart	Middletown, DE	Yes	Merchandise	
2001	1601	HA	Monday, April 04, 2011	\$46.04	Alfonso Restaurant	Clearwater, FL	Yes	Restaurant	

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2003	1602	LF	Monday, April 04, 2011	\$5.61	Dunkin Donuts	Concordville, PA	Yes	Fast Food	
2004	1603	LF	Monday, April 04, 2011	\$35.29	Primo Hoagies (restaurant)	Glen Mills, PA	Yes	Restaurant	
2005	1604	LF	Tuesday, April 05, 2011	\$14.18	McDonald's	Concordville, PA	Yes	Fast Food	
2007	1605	HA	Tuesday, April 05, 2011	\$21.63	Pickles Plus Too	Clearwater, FL	Yes	Restaurant	
2008	1606	HA	Wednesday, April 06, 2011	\$81.02	Angelo's Pizzeria	Holiday, FL	Yes	Restaurant	
2009	1607	HA	Wednesday, April 06, 2011	\$24.24	Tony's Pizzeria	Clearwater, FL	Yes	Restaurant	
2012	1608	LF	Thursday, April 07, 2011	\$10.98	Hardies	Middletown, DE	Yes	Fast Food	
2013	1609	LF	Thursday, April 07, 2011	\$22.63	Pat's Pizzeria	Glen Mills, PA	Yes	Restaurant	
2014	1610	HA	Friday, April 08, 2011	\$63.99	Alfonso's Restaurant	Clearwater, FL	Yes	Restaurant	
2015	1611	KS	Friday, April 08, 2011	\$90.90	Cody's Original Roadhouse	Tarpon Springs, FL	Yes	Restaurant	
2017	1612	LF	Friday, April 08, 2011	\$72.20	Papa John's	Clearwater, FL	Yes	Restaurant	
2018	1613	KS	Friday, April 08, 2011	\$25.08	Pickles Plus Too	Clearwater, FL	Yes	Restaurant	
2019	1614	LF	Friday, April 08, 2011	\$51.54	Ruby's Diner	Glen Mills, PA	Yes	Restaurant	
2020	1615	HA	Saturday, April 09, 2011	\$129.70	Vincenzo's	New Port Richey, FL	Yes	Restaurant	
2021	1616	HA	Sunday, April 10, 2011	\$6.21	Avis Rent A Car	Tampa, FL	Yes	Rental Cars	
2022	1617	HA	Sunday, April 10, 2011	\$11.44	Sunoco (Auto Fuel)	Clearwater, FL	Yes	Gas Station/Store	
2023	1618	HA	Sunday, April 10, 2011	\$17.08	WAWA Gas Station/Store	Chadds Ford, PA	Yes	Gas Station/Store	
2024	1619	HA	Monday, April 11, 2011	\$16.87	Boston Market	Talleville, DE	Yes	Restaurant	
2026	1620	LF	Tuesday, April 12, 2011	\$48.82	Pat's Pizzeria	Glen Mills, PA	Yes	Restaurant	
2027	1621	KS	Wednesday, April 13, 2011	\$28.28	Pescatore's Italian	Glen Mills, PA	Yes	Restaurant	
2028	1622	HA	Thursday, April 14, 2011	\$72.72	Pescatore's Italian	Glen Mills, PA	Yes	Restaurant	
2029	1623	HA	Friday, April 15, 2011	\$14.99	AT&T	Alpharetta, GA	Yes	Phone	
2030	1624	HA	Saturday, April 16, 2011	\$86.72	OAK ROOM (food)	New York, NY	Yes	Restaurant	
2031	1625	HA	Monday, April 18, 2011	\$67.60	Alfonso's Restaurant	Clearwater, FL	Yes	Restaurant	
2032	1626	HA	Monday, April 18, 2011	\$108.39	Cody's Original Roadhouse	Clearwater, FL	Yes	Restaurant	Changed Tarpon Springs, FL to Clearwater, FL
2033	1627	HA	Monday, April 18, 2011	\$20.27	Pickles Plus Too	Clearwater, FL	Yes	Restaurant	
2034	1628	KS	Monday, April 18, 2011	\$181.87	Verizon Wireless	online	Yes	Phone	Changed NA to Online
2036	1629	KS	Tuesday, April 19, 2011	\$13.68	Tony's Pizzeria	Clearwater, FL	Yes	Restaurant	
2037	1630	HA	Tuesday, April 19, 2011	\$270.49	Villar Galliano Italian	Indian Rocks Beach, FL	Yes	Restaurant	Changed Indian Beach, FL to Indian Rocks Beach, FL
2038	1631	HA	Wednesday, April 20, 2011	\$20.39	Pickles Plus Too	Clearwater, FL	Yes	Restaurant	
2039	1632	LF	Thursday, April 21, 2011	\$125.39	Primo Hoagies (restaurant)	Glen Mills, PA	Yes	Restaurant	
2040	1633	LF	Tuesday, April 26, 2011	\$46.16	Harvest	Glen Mills, PA	Yes	Restaurant	
2041	1634	LF	Wednesday, April 27, 2011	\$5.40	McDonald's	Middletown, DE	Yes	Fast Food	
2042	1635	LF	Thursday, April 28, 2011	\$19.48	Applebees	Middletown, DE	Yes	Restaurant	
2043	1636	LF	Friday, April 29, 2011	\$8.01	Dunkin Donuts	Chadds Ford, PA	Yes	Fast Food	
2044	1637	HA	Saturday, April 30, 2011	\$52.41	Moes Springfield Food	Springfield, PA	Yes	Fast Food	
2045	1638	HA	Monday, May 02, 2011	\$72.69	Pescatore's Italian	Glen Mills, PA	Yes	Restaurant	
2046	1639	LF	Tuesday, May 03, 2011	\$77.55	Pat's Pizzeria	Glen Mills, PA	Yes	Restaurant	
2047	1640	HA	Wednesday, May 04, 2011	\$20.97	Boston Market	Talleville, DE	Yes	Restaurant	
2048	1641	LF	Wednesday, May 04, 2011	\$53.12	Primo Hoagies (restaurant)	Glen Mills, PA	Yes	Restaurant	
2050	1642	LF	Thursday, May 05, 2011	\$184.69	Woody's Crab House	North East, MD	Yes	Restaurant	
2051	1643	LF	Friday, May 06, 2011	\$117.60	Harvest	Glen Mills, PA	Yes	Restaurant	
2053	1644	HA	Friday, May 06, 2011	\$33.30	Pescatore's Italian	Glen Mills, PA	Yes	Restaurant	
2054	1645	LF	Friday, May 06, 2011	\$92.45	Pickles Plus Too	Clearwater, FL	Yes	Restaurant	
2055	1646	HA	Sunday, May 08, 2011	\$141.28	Outback	Glen Mills, PA	Yes	Restaurant	
2057	1647	KS	Monday, May 09, 2011	\$47.22	Ruby Tuesday	Wilmington, DE	Yes	Restaurant	
2058	1648	HA	Tuesday, May 10, 2011	\$65.22	Mckenzie Brew House	Glen Mills, PA	Yes	Restaurant	
2059	1649	HA	Tuesday, May 10, 2011	\$256.18	Millie High Steak & Seafood	Glen Mills, PA	Yes	Restaurant	
2060	1650	HA	Monday, May 10, 2010	\$25.77	Philadelphia's Famous Restaurant	Philadelphia, PA	Yes	Restaurant	
2061	1651	HA	Tuesday, May 10, 2011	\$10.64	WAWA Gas Station/Store	Concordville, PA	Yes	Gas Station/Store	Changed date from 5/10/2011 to 5/10/2010
2062	1652	HA	Wednesday, May 11, 2011	\$38.58	Pescatore's Italian	Glen Mills, PA	Yes	Restaurant	
2063	1653	HA	Wednesday, May 11, 2011	\$11.15	WAWA Gas Station/Store	Chadds Ford, PA	Yes	Gas Station/Store	
2064	1654	HA	Thursday, May 12, 2011	\$16.87	Boston Market	Talleville, DE	Yes	Restaurant	

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2065	1655	LF	Thursday, May 12, 2011	\$34.96	Manhattan Bagel	Wilmington, DE	Yes	Restaurant	
2066	1656	LF	Thursday, May 12, 2011	\$37.80	Mckenzie Brew House	Glen Mills, PA	Yes	Restaurant	
2067	1657	LF	Thursday, May 12, 2011	\$27.68	Shell Oil	Wilmington, DE	Yes	Gas Station/Store	
2068	1658	HA	Thursday, May 12, 2011	\$4.08	WAWA Gas Station/Store/Store	Concordville, PA	Yes	Gas Station/Store	
2069	1659	HA	Friday, May 13, 2011	\$14.17	WAWA Gas Station/Store/Store	Concordville, PA	Yes	Gas Station/Store	
2070	1660	HA	Saturday, May 14, 2011	\$20.53	TGI Fridays	Woodbridge, NJ	Yes	Restaurant	
2071	1661	HA	Sunday, May 15, 2011	\$14.99	AT&T	Alpharetta, GA	Yes	Phone	
2073	1662	HA	Sunday, May 15, 2011	\$35.68	Philadelphia's Famous Restaurant	Philadelphia, PA	Yes	Restaurant	
2074	1663	KS	Monday, May 16, 2011	\$342.87	Verizon Wireless	online	Yes	Phone	Changed NA to Online
2078	1664	HA	Thursday, May 19, 2011	\$13.34	WAWA Gas Station/Store/Store	Chadds Ford, PA	Yes	Gas Station/Store	
2081	1665	HA	Friday, May 20, 2011	\$12.91	WAWA Gas Station/Store/Store	Chadds Ford, PA	Yes	Gas Station/Store	
2082	1666	HA	Friday, May 20, 2011	\$14.17	WAWA Gas Station/Store/Store	Chadds Ford, PA	Yes	Gas Station/Store	
2083	1667	LF	Saturday, May 21, 2011	\$104.47	Marriott	Philadelphia, PA	Yes	Hotel	
2084	1668	HA	Sunday, May 22, 2011	\$64.64	Angelo's Pizza	Holiday, FL	Yes	Restaurant	
2085	1669	HA	Sunday, May 22, 2011	\$26.11	Philadelphia's Famous Restaurant	Philadelphia, PA	Yes	Restaurant	
2088	1670	LF	Monday, May 23, 2011	\$10.46	Paradise (Souvenir Store)	Philadelphia, PA	Yes	Merchandise	
2091	1671	HA	Monday, May 23, 2011	\$64.36	TGI Fridays	Tampa, FL	Yes	Restaurant	
2092	1672	LF	Saturday, May 28, 2011	\$25.97	WAWA Gas Station/Store/Store	Middletown, DE	Yes	Gas Station/Store	
2093	1673	HA	Sunday, May 29, 2011	\$211.86	Wal-mart	Port Richey, FL	Yes	Merchandise	
2094	1674	LF	Tuesday, May 31, 2011	\$7.54	Paradise (Souvenir Store)	Philadelphia, PA	Yes	Merchandise	Changed Paradise to Paradises
2095	1675	LF	Tuesday, May 31, 2011	\$73.03	Pickles Plus Too	Clearwater, FL	Yes	Restaurant	
2096	1676	LF	Wednesday, June 01, 2011	\$47.55	Chaling Mal	Clearwater, FL	Yes	Restaurant	
2097	1677	LF	Wednesday, June 01, 2011	\$29.50	Los Mayas Restaurant	Clearwater, FL	Yes	Restaurant	
2098	1678	HA	Wednesday, June 01, 2011	\$7.67	McDonald's	Holiday, FL	Yes	Fast Food	
2099	1679	LF	Friday, June 03, 2011	\$5.73	Auntie Annes	Philadelphia, PA	Yes	Fast Food	
2100	1680	LF	Friday, June 03, 2011	\$10.70	Bijoux Turner	Tampa, FL	Yes	Merchandise	
2101	1681	HA	Friday, June 03, 2011	\$56.12	Carrabba's (food)	Tampa, FL	Yes	Restaurant	
2102	1682	LF	Friday, June 03, 2011	\$7.01	Giant Oil	Clearwater, FL	Yes	Gas Station/Store	
2103	1683	LF	Friday, June 03, 2011	\$7.07	McDonald's	Clearwater, FL	Yes	Fast Food	
2104	1684	HA	Saturday, June 04, 2011	\$10.67	WAWA Gas Station/Store/Store	Boothwyn, PA	Yes	Gas Station/Store	
2105	1685	HA	Sunday, June 05, 2011	\$18.46	WAWA Gas Station/Store/Store	Boothwyn, PA	Yes	Gas Station/Store	
2106	1686	HA	Sunday, June 05, 2011	\$20.51	WAWA Gas Station/Store/Store	Boothwyn, PA	Yes	Gas Station/Store	
2107	1687	LF	Monday, June 06, 2011	\$43.63	Shell Oil	Wilmington, DE	Yes	Gas Station/Store	
2108	1688	LF	Monday, June 06, 2011	\$9.58	WAWA Gas Station/Store/Store	Chadds Ford, PA	Yes	Gas Station/Store	
2109	1689	HA	Monday, June 06, 2011	\$10.95	WAWA Gas Station/Store/Store	Chadds Ford, PA	Yes	Gas Station/Store	
2110	1690	LF	Tuesday, June 07, 2011	\$34.09	Mckenzie Brew House	Glen Mills, PA	Yes	Restaurant	
2112	1691	HA	Wednesday, June 08, 2011	\$14.28	Boston Market	Talleyville, DE	Yes	Restaurant	
2113	1692	HA	Wednesday, June 08, 2011	\$32.90	Pescatore's Italian	Glen Mills, PA	Yes	Restaurant	
2114	1693	LF	Thursday, June 09, 2011	\$17.45	Dunkin Donuts	Chadds Ford, PA	Yes	Fast Food	
2115	1694	LF	Thursday, June 09, 2011	\$90.00	Primo Hoagies (restaurant)	Glen Mills, PA	Yes	Restaurant	
2116	1695	HA	Thursday, June 09, 2011	\$53.00	Thrifty Car Rental	Tampa, FL	Yes	Rental Cars	Changed Clearwater, FL to Glen Mills, PA
2118	1696	LF	Friday, June 10, 2011	\$105.44	Manhattan Bagel	Wilmington, DE	Yes	Restaurant	
2119	1697	HA	Saturday, June 11, 2011	\$201.35	Home Depot	Glen Mills, PA	Yes	Home Improvement	
2120	1698	HA	Saturday, June 11, 2011	\$14.18	KFC	Woodlyn, PA	Yes	Fast Food	
2121	1699	LF	Sunday, June 12, 2011	\$34.86	Wal-mart	Middletown, DE	Yes	Merchandise	
2123	1700	LF	Monday, June 13, 2011	\$12.82	Paradise (Souvenir Store)	Philadelphia, PA	Yes	Merchandise	
2124	1701	HA	Monday, June 13, 2011	\$50.76	Pescatore's Italian	Glen Mills, PA	Yes	Restaurant	Changed Paradise to Paradises
2125	1702	LF	Monday, June 13, 2011	\$6.72	Pickles Plus Too	Clearwater, FL	Yes	Restaurant	
2126	1703	HA	Tuesday, June 14, 2011	\$14.99	AT&T	Alpharetta, GA	Yes	Phone	
2127	1704	HA	Tuesday, June 14, 2011	\$49.96	Marathon Grill	Philadelphia, PA	Yes	Restaurant	
2128	1705	HA	Tuesday, June 14, 2011	\$15.24	WAWA Gas Station/Store/Store	Chadds Ford, PA	Yes	Gas Station/Store	
2129	1706	LF	Wednesday, June 15, 2011	\$35.11	Cristinos Coal Oven	Clearwater, FL	Yes	Restaurant	
2130	1707	HA	Wednesday, June 15, 2011	\$29.97	Ruby's Diner	Glen Mills, PA	Yes	Restaurant	
2131	1708	HA	Thursday, June 16, 2011	\$7.31	New York Bagel Café	Glen Mills, PA	Yes	Restaurant	

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2132	1709	HA	Thursday, June 16, 2011	\$28.83	Pescatores Italian	Glen Mills, PA	Yes	Restaurant	
2133	1710	KS	Thursday, June 16, 2011	\$186.81	Verizon	online	Yes	Phone	
2134	1711	LF	Friday, June 17, 2011	\$72.80	Luxor Adv Room Resv	Las Vegas, NV	Yes	Hotel	
2135	1712	HA	Friday, June 17, 2011	\$55.46	Nino's Pizza	Namans, DE	Yes	Restaurant	
2136	1713	HA	Friday, June 17, 2011	\$30.85	Ruby's Diner	Glen Mills, PA	Yes	Restaurant	
2137	1714	HA	Sunday, June 19, 2011	\$3.84	WAWA Gas Station/Store	Concordville, PA	Yes	Gas Station/Store	
2138	1715	LF	Monday, June 20, 2011	\$34.57	McKenzie Brew House	Glen Mills, PA	Yes	Restaurant	
2139	1716	LF	Monday, June 20, 2011	\$24.81	WAWA Gas Station/Store	Middletown, DE	Yes	Gas Station/Store	
2140	1717	HA	Tuesday, June 21, 2011	\$25.52	OTG Management (Fast Food)	Philadelphia, PA	Yes	Fast Food	
2141	1718	LF	Tuesday, June 21, 2011	\$36.70	Ruby's Diner	Glen Mills, PA	Yes	Restaurant	
2142	1719	HA	Friday, June 24, 2011	\$86.36	Todd English Pub	Las Vegas, NV	Yes	Restaurant	Changed Las Vegas, NV to Las Vegas, NV
2143	1720	HA	Monday, June 27, 2011	\$11.21	Dunkin Donuts	Concordville, PA	Yes	Fast Food	
2144	1721	LF	Monday, June 27, 2011	\$33.57	McKenzie Brew House	Glen Mills, PA	Yes	Restaurant	
2146	1722	HA	Monday, June 27, 2011	\$16.80	New York Bagel Cafe	Glen Mills, PA	Yes	Restaurant	
2147	1723	HA	Monday, June 27, 2011	\$151.79	Pescatores Italian	Glen Mills, PA	Yes	Restaurant	
2149	1724	LF	Tuesday, June 28, 2011	\$30.00	WAWA Gas Station/Store	Middletown, DE	Yes	Gas Station/Store	
2150	1725	KS	Wednesday, June 29, 2011	\$29.00	OTG Management (Fast Food)	Philadelphia, PA	Yes	Fast Food	
2151	1726	LF	Wednesday, June 29, 2011	\$86.50	PF Chang's	Glen Mills, PA	Yes	Restaurant	
2152	1727	LF	Thursday, June 30, 2011	\$18.62	Dunkin Donuts	Chadds Ford, PA	Yes	Fast Food	
2153	1728	LF	Thursday, June 30, 2011	\$106.94	Primo Hoagies (restaurant)	Glen Mills, PA	Yes	Restaurant	
2154	1729	LF	Friday, July 01, 2011	\$141.05	Pickles Plus Too	Clearwater, FL	Yes	Restaurant	
2155	1730	LF	Thursday, July 07, 2011	\$5.79	Hardees	Middletown, DE	Yes	Fast Food	
2156	1731	HA	Thursday, July 07, 2011	\$30.40	Pescatores Italian	Glen Mills, PA	Yes	Restaurant	
2157	1732	LF	Thursday, July 07, 2011	\$14.94	WAWA Gas Station/Store	Concordville, PA	Yes	Gas Station/Store	
2158	1733	HA	Thursday, July 07, 2011	\$15.70	WAWA Gas Station/Store	Chadds Ford, PA	Yes	Gas Station/Store	
2159	1734	HA	Friday, July 08, 2011	\$33.31	Bertucci's	Glen Mills, PA	Yes	Restaurant	
2160	1735	LF	Friday, July 08, 2011	\$44.78	Ruby's Diner	Glen Mills, PA	Yes	Restaurant	
2161	1736	HA	Saturday, July 09, 2011	\$19.49	KFC	Claymont, DE	Yes	Fast Food	
2162	1737	HA	Saturday, July 09, 2011	\$18.97	Wal-Mart	Boothwyn, PA	Yes	Merchandise	
2163	1738	HA	Sunday, July 10, 2011	\$26.58	Philadelphia's Famous Restaurant	Philadelphia, PA	Yes	Restaurant	
2164	1739	LF	Tuesday, July 12, 2011	\$23.53	Pat's Pizzeria	Glen Mills, PA	Yes	Restaurant	
2165	1740	HA	Tuesday, July 12, 2011	\$12.63	WAWA Gas Station/Store	Chadds Ford, PA	Yes	Gas Station/Store	
2166	1741	HA	Wednesday, July 13, 2011	\$54.48	Pescatores Italian	Glen Mills, PA	Yes	Restaurant	
2167	1742	LF	Wednesday, July 13, 2011	\$41.46	Primo Hoagies (restaurant)	Glen Mills, PA	Yes	Restaurant	
2168	1743	HA	Thursday, July 14, 2011	\$24.99	AT&T	Alpharetta, GA	Yes	Phone	
2169	1744	LF	Thursday, July 14, 2011	\$15.79	Starbucks	Glen Mills, PA	Yes	Fast Food	
2170	1745	HA	Thursday, July 14, 2011	\$13.58	WAWA Gas Station/Store	Chadds Ford, PA	Yes	Gas Station/Store	
2171	1746	HA	Monday, July 18, 2011	\$40.70	Pescatores Italian	Glen Mills, PA	Yes	Restaurant	
2173	1747	HA	Tuesday, July 19, 2011	\$11.55	WAWA Gas Station/Store	Concordville, PA	Yes	Gas Station/Store	
2174	1748	HA	Wednesday, July 20, 2011	\$7.46	McDonald's	Darien, CT	Yes	Fast Food	
2175	1749	LF	Wednesday, July 20, 2011	\$34.09	McKenzie Brew House	Glen Mills, PA	Yes	Restaurant	
2176	1750	LF	Wednesday, July 20, 2011	\$3.98	Starbucks	West Chester, PA	Yes	Fast Food	
2177	1751	LF	Wednesday, July 20, 2011	\$14.10	Starbucks	West Chester, PA	Yes	Fast Food	
2178	1752	LF	Friday, July 22, 2011	\$5.29	Hardees	Middletown, DE	Yes	Fast Food	
2179	1753	HA	Friday, July 22, 2011	\$30.36	Pescatores Italian	Glen Mills, PA	Yes	Restaurant	
2180	1754	HA	Friday, July 22, 2011	\$42.77	Target	Berwyn, PA	Yes	Merchandise	
2181	1755	LF	Monday, July 25, 2011	\$5.60	Chick-Fil-A	Philadelphia, PA	Yes	Fast Food	
2182	1756	LF	Monday, July 25, 2011	\$208.11	Island Way Grill	Clearwater, FL	Yes	Restaurant	
2183	1757	LF	Monday, July 25, 2011	\$13.82	Pescatores (Sousmar Store)	Philadelphia, PA	Yes	Merchandise	
2185	1758	HA	Tuesday, July 26, 2011	\$23.53	KFC	New Port Richey, FL	Yes	Fast Food	Changed Paradise to Parades
2186	1759	LF	Tuesday, July 26, 2011	\$6.72	Pickles Plus Too	Clearwater, FL	Yes	Restaurant	
2187	1760	HA	Tuesday, July 26, 2011	\$23.88	Pickles Plus Too	Clearwater, FL	Yes	Restaurant	
2188	1761	LF	Tuesday, July 26, 2011	\$85.09	Tony's Pizzeria	Clearwater, FL	Yes	Restaurant	
2189	1762	LF	Wednesday, July 27, 2011	\$126.68	Columbia Restaurant	Clearwater, FL	Yes	Restaurant	

Original Number	Amended Number	Purchaser	Date	Amount	Vendor	Location	Fund (y/n)	Expense Type	Changes
2190	1763	LF	Wednesday, July 27, 2011	\$19.85	Starbucks	Cleawater, FL	Yes	Fast Food	
2191	1764	HA	Wednesday, July 27, 2011	\$7.49	Starbucks	Cleawater, FL	Yes	Fast Food	
2192	1765	LF	Wednesday, July 27, 2011	\$138.54	Tony's Pizzeria	Cleawater, FL	Yes	Restaurant	
2193	1766	LF	Thursday, July 28, 2011	\$160.97	Pickles Plus Too	Cleawater, FL	Yes	Restaurant	
2194	1767	LF	Friday, July 29, 2011	\$7.98	Food Court	Tampa, FL	Yes	Fast Food	Changed Food Cart to Food Court
2195	1768	LF	Friday, July 29, 2011	\$217.32	Mops	Cleawater, FL	Yes	Fast Food	
2196	1769	LF	Monday, August 01, 2011	\$23.85	Pat's Pizzeria	Glen Mills, PA	Yes	Restaurant	
2197	1770	HA	Monday, August 01, 2011	\$44.92	Pescatore's Italian	Glen Mills, PA	Yes	Restaurant	
2198	1771	HA	Tuesday, August 02, 2011	\$6.03	Burger King	West Chester, PA	Yes	Fast Food	
2199	1772	HA	Tuesday, August 02, 2011	\$5.82	KFC	Springfield, PA	Yes	Fast Food	
2200	1773	LF	Tuesday, August 02, 2011	\$5.78	McDonald's	Concordville, PA	Yes	Fast Food	
2201	1774	LF	Wednesday, August 03, 2011	\$10.45	Chick-FL-A	Glen Mills, PA	Yes	Fast Food	
2202	1775	KS	Thursday, August 04, 2011	\$23.35	Friendly's Ice Cream	West Chester, PA	Yes	Restaurant	
2203	1776	HA	Thursday, August 04, 2011	\$3.45	New York Bagel Café	Glen Mills, PA	Yes	Restaurant	
2204	1777	HA	Thursday, August 04, 2011	\$36.12	Pescatore's Italian	Glen Mills, PA	Yes	Restaurant	
2205	1778	LF	Friday, August 05, 2011	\$13.44	McDonald's	Concordville, PA	Yes	Fast Food	
2206	1779	LF	Friday, August 05, 2011	\$20.85	Panera Bread	Wilmington, DE	Yes	Restaurant	
2207	1780	HA	Monday, August 08, 2011	\$21.66	Delco's Original (food)	West Chester, PA	Yes	Restaurant	
2208	1781	LF	Tuesday, August 09, 2011	\$5.79	Arby's	Wilmington, DE	Yes	Fast Food	
2209	1782	HA	Wednesday, August 10, 2011	\$7.52	Arby's	West Chester, PA	Yes	Fast Food	
2210	1783	LF	Thursday, August 11, 2011	\$36.40	Jasmine	Wilmington, DE	Yes	Restaurant	
2211	1784	LF	Friday, August 12, 2011	\$27.22	TGI Fridays	West Chester, PA	Yes	Restaurant	
2212	1785	HA	Saturday, August 13, 2011	\$14.99	AT&T	Alpharetta, GA	Yes	Phone	
2213	1786	LF	Tuesday, August 16, 2011	\$5.82	McDonald's	Concordville, PA	Yes	Fast Food	
2214	1787	KS	Tuesday, August 16, 2011	\$150.09	Verizon	online	Yes	Phone	
2215	1788	HA	Wednesday, August 17, 2011	\$44.39	Pescatore's Italian	Glen Mills, PA	Yes	Restaurant	
2216	1789	LF	Wednesday, August 17, 2011	\$34.41	TGI Fridays	West Chester, PA	Yes	Restaurant	
2217	1790	HA	Monday, August 22, 2011	\$25.63	Pescatore's Italian	Glen Mills, PA	Yes	Restaurant	
2218	1791	HA	Thursday, August 25, 2011	\$29.54	Ruby's Diner	Glen Mills, PA	Yes	Restaurant	
2219	1792	HA	Saturday, September 03, 2011	\$32.23	Philadelphia's Famous Restaurant	Philadelphia, PA	Yes	Restaurant	
2220	1793	HA	Wednesday, September 07, 2011	\$64.50	Cody's Original Roadhouse	Tarpon Springs, FL	Yes	Restaurant	
2221	1794	HA	Wednesday, September 07, 2011	\$7.47	McDonald's	Cleawater, FL	Yes	Fast Food	
2222	1795	HA	Friday, September 09, 2011	\$75.67	Angelo's Pizza	Holiday, FL	Yes	Restaurant	
2223	1796	HA	Monday, September 12, 2011	\$14.99	AT&T	Alpharetta, GA	Yes	Phone	
2224	1797	HA	Monday, September 12, 2011	\$65.04	Harold Selzer's	Port Richey, FL	Yes	Restaurant	
2228	1798	HA	Saturday, September 17, 2011	\$3.69	McDonald's	Boothwyn, PA	Yes	Fast Food	
2229	1799	HA	Monday, September 19, 2011	\$5.30	McDonald's	Concordville, PA	Yes	Fast Food	
2230	1800	HA	Tuesday, September 20, 2011	\$59.17	Angelo's Pizza	Holiday, FL	Yes	Restaurant	
2231	1801	HA	Wednesday, October 12, 2011	\$14.99	AT&T	Alpharetta, GA	Yes	Phone	
2232	1802	HA	Friday, November 12, 2010	\$258.55	Casiludovico	Palm Harbor, FL	Yes	Restaurant	Changed date from 11/12/2011 to 11/12/2010
2233	1803	HA	Saturday, November 13, 2010	\$19.21	Angelo's Pizza	Holiday, FL	Yes	Restaurant	Changed date from 11/13/2011 to 11/13/2010
2234	1804	HA	Saturday, November 13, 2010	\$49.48	CVS	Holiday, FL	Yes	Pharmacy	Changed date from 11/13/2011 to 11/13/2010
2235	1805	HA	Sunday, November 14, 2010	\$98.44	Angelo's Pizza	Holiday, FL	Yes	Restaurant	Changed date from 11/14/2011 to 11/14/2010
2236	1806	HA	Monday, November 15, 2010	\$67.60	Alfano's Restaurant	Cleawater, FL	Yes	Restaurant	Changed date from 11/15/2011 to 11/15/2010
2237	1807	HA	Tuesday, November 16, 2010	\$32.75	City Grill and Bar	Tarpon Springs, FL	Yes	Restaurant	Changed date from 11/16/2011 to 11/16/2010
2238	1808	HA	Tuesday, November 16, 2010	\$89.58	Pickles Plus Too	Cleawater, FL	Yes	Restaurant	Changed date from 11/16/2011 to 11/16/2010
2241	1809	HA	Wednesday, November 17, 2010	\$134.26	Walgreens	Cleawater, FL	Yes	Pharmacy	Changed date from 11/17/2011 to 11/17/2010
2242	1810	HA	Thursday, November 19, 2009	\$48.78	Pescatore's Italian	Glen Mills, PA	Yes	Restaurant	Changed date from 11/19/2011 to 11/19/2009
2243	1811	HA	Saturday, November 20, 2010	\$7.46	Burger King	Holiday, FL	Yes	Fast Food	Changed date from 11/20/2011 to 11/20/2009
2244	1812	HA	Friday, November 20, 2009	\$228.94	Millie High Steak & Seafood	Glen Mills, PA	Yes	Restaurant	Changed date from 11/20/2011 to 11/20/2009
2245	1813	HA	Friday, November 20, 2009	\$15.38	Wawa	Concordville, PA	Yes	Gas Station/Store	Changed date from 11/20/2011 to 11/20/2009
2246	1814	HA	Saturday, November 21, 2009	\$19.49	KFC	Claymont, DE	Yes	Fast Food	Changed date from 11/21/2011 to 11/21/2009
2247	1815	HA	Saturday, November 21, 2009	\$18.95	Wawa	Chadds Ford, PA	Yes	Gas Station/Store	Changed date from 11/21/2011 to 11/21/2009
2248	1815	HA	Monday, November 23, 2009	\$27.00	Blue Pear Bistro	West Chester, PA	Yes	Restaurant	Changed date from 11/23/2011 to 11/23/2009

Original Number	Amended Number	Purchaser	Date	Amount	Vendor	Location	Fund (Y/N)	Expense Type	Changes
2249	1817	HA	Monday, November 23, 2009	\$271.69	Dillworthtown Inn	West Chester, PA	Yes	Restaurant	Changed date from 11/23/2011 to 11/23/2009
2250	1818	HA	Monday, November 23, 2009	\$28.05	Friendly's Ice Cream	West Chester, PA	Yes	Restaurant	Changed date from 11/23/2011 to 11/23/2009
2251	1819	HA	Monday, November 23, 2009	\$317.20	Shymall.com	online	Yes	Miscellaneous	Changed date from 11/23/2011 to 11/23/2009
2252	1820	HA	Monday, November 23, 2009	\$50.87	Wawa	Concordville, PA	Yes	Gas Station/Store	Changed date from 11/23/2011 to 11/23/2009
2253	1821	HA	Tuesday, November 24, 2009	\$239.86	Home Depot	Claymont, DE	Yes	Home Improvement	Changed date from 11/24/2011 to 11/24/2009
2254	1822	HA	Wednesday, November 25, 2009	\$79.99	Best Buy	Wilmington, DE	Yes	Miscellaneous	Changed date from 11/25/2011 to 11/25/2009
2255	1823	HA	Wednesday, November 25, 2009	\$38.88	Genuardi's Store - Grocery	Glen Mills, PA	Yes	Grocery	Changed date from 11/25/2011 to 11/25/2009 & Changed Genuardi's to Genuardis
2256	1824	HA	Thursday, November 26, 2009	\$321.75	CVS	Glen Mills, PA	Yes	Pharmacy	Changed date from 11/26/2011 to 11/26/2009
2257	1825	HA	Thursday, November 26, 2009	\$20.50	Dillworthtown Inn	West Chester, PA	Yes	Restaurant	
2258	1826	HA	Thursday, November 26, 2009	\$439.11	Dillworthtown Inn	West Chester, PA	Yes	Restaurant	
2259	1827	HA	Friday, November 26, 2010	\$442.10	Vincenzo's	Port Richey, FL	Yes	Restaurant	Changed date from 11/26/2011 to 11/26/2010
2260	1828	HA	Friday, November 27, 2009	\$64.76	Home Depot	Glen Mills, PA	Yes	Home Improvement	Changed date from 11/27/2011 to 11/27/2009
2261	1829	HA	Saturday, November 28, 2009	\$30.50	Resorts AC Capriccio	Atlantic City, NJ	Yes	Hotel	Changed date from 11/28/2011 to 11/28/2009
2262	1830	HA	Saturday, November 28, 2009	\$488.55	Resorts AC Capriccio	Atlantic City, NJ	Yes	Hotel	Changed date from 11/28/2011 to 11/28/2009
2263	1831	HA	Monday, November 30, 2009	\$5.44	McDonald's	Holiday, FL	Yes	Fast Food	Changed date from 11/30/2011 to 11/30/2009
2264	1832	HA	Tuesday, December 01, 2009	\$3.42	McDonald's	Holiday, FL	Yes	Fast Food	Changed date from 12/1/2011 to 12/1/2009
2265	1833	HA	Wednesday, December 02, 2009	\$188.21	Avis Rent A Car	Tampa, FL	Yes	Rental Cars	Changed date from 12/2/2011 to 12/2/2009
2266	1834	HA	Wednesday, December 02, 2009	\$6.40	Poppy's	Tampa, FL	Yes	Fast Food	Changed date from 12/2/2011 to 12/2/2009
2267	1835	HA	Thursday, December 03, 2009	\$47.39	Home Depot	Glen Mills, PA	Yes	Home Improvement	Changed date from 12/3/2011 to 12/3/2009
2268	1836	HA	Friday, December 04, 2009	\$54.90	Dillworthtown Inn	West Chester, PA	Yes	Restaurant	Changed date from 12/4/2011 to 12/4/2009
2269	1837	HA	Friday, December 04, 2009	\$5,888.21	Dillworthtown Inn	West Chester, PA	Yes	Restaurant	Changed date from 12/4/2011 to 12/4/2009
2270	1838	HA	Friday, December 04, 2009	\$4.67	McDonald's	Boothwyn, PA	Yes	Fast Food	Changed date from 12/4/2011 to 12/4/2009
2271	1839	HA	Friday, December 04, 2009	\$49.20	Sinoco	Brasewick, NJ	Yes	Gas Station/Store	Changed date from 12/4/2011 to 12/4/2009
2272	1840	HA	Saturday, February 12, 2011	\$325.81	Rite Aid	Boothwyn, PA	Yes	Pharmacy	Changed date from 12/4/2011 to 12/4/2009
				\$208,953.75					