



# Morley Volunteer Fire Company

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## Misappropriation of Funds

**2023M-154 | March 2024**

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# Report Highlights

## Morley Volunteer Fire Company

### Audit Objective

Determine whether Morley Volunteer Fire Company (Company) officials provided oversight of financial operations to ensure funds were safeguarded.

### Key Findings

Company officials did not provide oversight of financial operations to ensure funds were safeguarded. As a result, the former Treasurer was able to misappropriate \$64,972 of Company funds from January 2016 through December 2019. The former Treasurer was able to:

- Obtain cash totaling \$45,400 by making inappropriate automated teller machine (ATM) and in-bank withdrawals, writing unauthorized checks to herself and receiving cash from Company funds presented for deposit.
- Make 178 personal purchases totaling \$19,572 using a Company debit card.

These improper transactions went undetected because Company officials did not review monthly bank statements and canceled check images, receive monthly financial reports, audit bills (claims) prior to payment or compare cash collections to deposits.

The former Treasurer was arrested in July 2023 and pleaded guilty to grand larceny in the fourth degree in November 2023. She was sentenced to probation in January 2024 and ordered to pay \$50,000 in restitution.

### Key Recommendation

- Routinely review the Treasurer's work, discontinue using debit cards, and audit and approve claims prior to payment.

Company officials agreed with our recommendations and indicated they plan to initiate corrective action.

### Audit Period

January 1, 2016 – December 31, 2019. Release of this report was held while outside law enforcement reviewed the matter.

### Background

The Company is a not-for-profit organization that operates in affiliation with the Morley Fire District (District). The Company provides fire protection and emergency services to a portion of the Town of Canton in St. Lawrence County. The Company comprises volunteer members (membership) and is governed by its bylaws.

The members elect a five-member Board of Directors and also a five-member Advisory Board comprising the President, Vice President, Fire Chief, and 1st and 2nd Assistant Chiefs. Annually, members also elect a Treasurer, who is the chief fiscal officer responsible for receiving and maintaining custody of all Company funds, and disbursing and accounting for those funds.

The Company's primary sources of revenue include a fire protection contract, funding from the District and fundraisers.

#### Quick Facts

2020 Active Members	16
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#### 2016 – 2019

Total Revenue from Fire Protection Contracts and the District	\$184,939
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Total Misappropriated by Former Treasurer	\$64,972
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Total Misappropriated as Percent of Revenue from Fire Protection Contracts and the District	35%
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# Misappropriation of Funds

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## How Should Officials Provide Oversight of Financial Operations?

Fire company officials and membership are responsible for overseeing a fire company's financial operations and safeguarding funds. To fulfill this duty, it is essential that officials establish internal controls to ensure claims are audited prior to payment and that purchases were received, supported by an itemized invoice or receipt and are an appropriate company expense; cash collections are evidenced by documentation and deposited intact (i.e., in the same amount and form as received) into a company bank account; and all transactions are accurately recorded in the financial records. If these controls are not included in the bylaws, company officials should create and adopt supplementary policies and procedures.

Company officials also should develop a process to routinely monitor and review the work performed by those who handle or maintain custody of funds. Company officials should ensure that a board, committee or individual independent of financial operations is designated to review bank reconciliations, bank statements and canceled check images on a monthly basis; compare collections with deposits; and review financial records at least annually to help ensure transactions are properly recorded and cash is accounted for. Such a process is particularly important when one person performs nearly all financial duties such as collecting, depositing and disbursing cash, and maintaining the financial records.

The Company bylaws require the Treasurer to maintain custody of all funds in a Company bank account, keep a record of money collected and give a monthly report of the Company's financial status. Furthermore, the bylaws require the Treasurer to produce his or her books, receipts and statements for all funds collected and disbursed, at the annual meeting, or at any time at the request of the Advisory Board. The bylaws also state that purchases not exceeding \$500 may be made upon the approval of three officers, purchases not exceeding \$1,000 upon the approval of the Advisory Board and purchases exceeding \$1,000 upon the approval of a quorum of the membership.

## The Former Treasurer Misappropriated Nearly \$65,000 of Company Funds

The Company had two different Treasurers during our audit period. The current Treasurer was appointed in September 2019. The former Treasurer served from 2016 until the current Treasurer's appointment.

In October 2019, the Company's bank balances were depleted and the Company lacked the funds necessary to pay expenses. Company officials notified the District of the Company's financial situation and shared bank statements that showed multiple unsupported ATM withdrawals made by the former Treasurer.

Two District officials contacted the Office of the New York State Comptroller in January 2020 to request an audit of the Company.

Based on our review of bank statements, deposit compositions, canceled check images and purchases, the former Treasurer misappropriated \$64,972 of Company funds from January 2016 through December 2019 (Figure 1).

The former Treasurer used Company funds to make personal purchases and write unauthorized checks to herself, perform inappropriate ATM and in-bank cash withdrawals, and take cash collections for years without detection. This was able to occur because Company officials did not provide oversight of financial operations.

The Treasurers controlled all phases of the cash collections and disbursements process. They received and deposited funds, made purchases, paid invoices as received and without audit, signed checks, and made in-person bank transfers between Company bank accounts. Debit cards issued to the Treasurers were used to make purchases and ATM cash withdrawals. Debit cards pose significant risks because they allow funds to be directly withdrawn from the bank account at the time of purchase or through an ATM without prior approval or review. Such practices diminish accountability and enabled Company funds to be misused.

The Treasurers also maintained the financial records, consisting of a notebook containing monthly handwritten summaries of cash collections and disbursements. These monthly summaries were incomplete and did not reflect all financial transactions (as discussed throughout this report). In addition, the Treasurers did not share these monthly summaries with other officials, and provided only a verbal account of the Company’s financial activities during membership meetings.

Though the Treasurers performed all financial duties, officials did not implement compensating controls to safeguard funds. Officials did not:

- Compare cash collections to deposits.
- Designate a board, committee or individual to audit claims prior to payment to ensure they were supported by adequate documentation and were for appropriate Company purposes.
- Review monthly bank statements and canceled check images.
- Require the Treasurers to provide written monthly financial reports or complete bank reconciliations.

**Figure 1: Former Treasurer’s Misappropriation of Funds**

Type of Improper Transaction	Amount
<b>Cash Disbursements</b>	
Vendor Purchases	\$19,572
ATM Cash Withdrawals	16,994
Cash Withdrawals	10,335
Checks to Former Treasurer	1,735
<b>Subtotal</b>	<b>\$48,636</b>
<b>Cash Collections</b>	
Cash Back on Deposits	\$16,140
Cashed Check	196
<b>Subtotal</b>	<b>\$16,336</b>
<b>Total</b>	<b>\$64,972</b>

The former Treasurer used Company funds to make personal purchases and write unauthorized checks to herself, perform inappropriate ATM and in-bank cash withdrawals, and take cash collections for years without detection.

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Furthermore, officials did not follow the financial controls contained in the bylaws. Officials did not ensure that the former Treasurer annually submitted her records to the Advisory Board at the annual meeting, and they did not establish a process to obtain or document approvals prior to purchases.

Contributing to the lack of oversight and financial controls is that the bylaws do not clearly indicate who is responsible for overseeing the Company's financial operations. The bylaws require the membership to elect both a five-member Board of Directors and five-member Advisory Board. The bylaws are silent regarding the Board of Directors' duties and responsibilities, and only convey limited authority to the Advisory Board. As a result, it is unclear which of the Company's boards must oversee financial operations and implement appropriate controls.

The Company lacked cash throughout our audit period. In October 2017 and June 2018, the Company had to obtain loans totaling \$7,000 and \$8,000, respectively, due to a lack of funds necessary to continue operations. The Company repaid both loans, with a total of \$645 interest and fees, during our audit period. The Company also paid fees totaling \$50 for payments rejected by the bank for insufficient funds. The identified improper transactions and misappropriation of funds by the former Treasurer likely contributed to the Company's poor financial condition.

Vendor Purchases – Officials made 822 payments to vendors totaling \$230,929 during our audit period (2016 through 2019). These payments were made by check, debit card and electronic withdrawal. From all vendor payments, we identified and reviewed 604 payments totaling \$104,880 that posed a higher risk of being improper.<sup>1</sup>

There was no evidence in meeting minutes or other documentation to indicate any of the payments we reviewed had received prior approval, and 513 payments (85 percent) totaling \$62,902 were not recorded in the monthly summaries. Furthermore, 512 payments totaling \$87,788 were either not supported or lacked an itemized receipt showing what was purchased. As a result, we obtained and reviewed itemized receipts directly from certain Company vendors and interviewed Company officials to determine the appropriateness of purchases

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<sup>1</sup> See Appendix B for our sampling methodology.

made. We identified 178 improper purchases totaling \$19,572 that were made with the former Treasurer’s debit card (Figure 2). The current Treasurer, current Assistant Treasurer, former Board President, former Chief and former Assistant Chief confirmed that these purchases were inappropriate and unrelated to Company operations.

We also identified an additional 169 purchases totaling \$15,871 from vendors that sell items or services that could be used for personal purposes, and for which itemized receipts were unavailable. Of these purchases, 154 (91 percent) totaling \$14,234 were made with the former Treasurer’s debit card. Lacking itemized receipts showing what was purchased, we could not determine whether these were appropriate Company expenses.

**ATM Cash Withdrawals** – The former Treasurer’s debit card was used to make 76 ATM cash withdrawals totaling \$17,097 during our audit period. None of these withdrawals were recorded in the Treasurer’s monthly summaries and officials had no documentation to support why they were necessary. According to the former Board President and former Chief, one ATM withdrawal for \$103 that was made on the New York State Thruway was for an appropriate Company purpose. Officials made this withdrawal while traveling to pick up a newly purchased vehicle and used the cash to pay for tolls and fuel. However, according to the current Treasurer, current Assistant Treasurer, former Board President, former Chief and former Assistant Chief, the remaining 75 ATM withdrawals totaling \$16,994 were inappropriate (Figure 3).

**Cash Back on Deposits** – When making deposits, banks may allow customers to make an immediate withdrawal of a portion of the funds being deposited. The immediate withdrawal is referred to as “cash back,” and the amount received proportionally reduces the total deposited into the bank.

During our audit period, a total of \$16,290 cash back was obtained on 28 deposits into Company accounts. The current Treasurer endorsed the check associated with one of these deposits, from

**Figure 2: Improper Vendor Purchases**

Items or Services Purchased	Amount
Groceries and General Merchandise <sup>a</sup>	\$11,633
Cable/Internet Services	5,259
Home Goods	854
Prepared Meals	507
Building Supplies	390
Collection Agency Payment	234
Cosmetics	228
Toys and Gifts	129
Medical Bill	95
Miscellaneous Items/Services	243
<b>Total</b>	<b>\$19,572</b>

a) General merchandise includes clothing, toiletries, cleaning supplies, baby care products and other household items.

**Figure 3: Improper ATM Cash Withdrawals**

Location of ATM	Occurrences	Amount
<b>Company’s Bank</b>	65	\$15,200
<b>Casino</b>	4	1,079
<b>Tobacco Shop</b>	3	307
<b>Hotel</b>	2	306
<b>Gas Station</b>	1	102
<b>Total</b>	<b>75</b>	<b>\$16,994</b>

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which \$150 cash back was received. The current Treasurer stated she received the \$150 cash back on her deposit in December of 2019, shortly after being appointed as Treasurer, to establish a petty cash account. This transaction was documented on the Treasurer's monthly summary for December 2019 and within an electronic spreadsheet the current Treasurer had created to better record the Company's financial transactions.<sup>2</sup> Both records indicated these funds were for petty cash.

The former Treasurer endorsed the checks associated with the other 27 deposits, from which \$16,140 cash back was received. However, no documentation was available to explain why cash back was received on these deposits, and the current Assistant Treasurer, former Board President, former Chief and former Assistant Chief stated the receipt of cash back was improper. Four of these 27 deposits included only a single check, three of which included a check from the Town of Canton and one that included a check from the District. Together, these four checks totaled \$119,070 of taxpayer funds paid directly to the Company. The former Treasurer misappropriated a total of \$5,500 of these taxpayer funds when she received cash back upon depositing these checks.

Cash Withdrawals – There were 24 in-bank cash withdrawals totaling \$10,335 during our audit period. The former Treasurer made all these withdrawals as evidenced by her signature on the withdrawal slips. Documentation was not available to support any of these withdrawals and they were not recorded in the monthly summaries. The current Treasurer, current Assistant Treasurer, former Board President, former Chief and former Assistant Chief stated these withdrawals were inappropriate and unnecessary to support Company operations.

Checks to Former Treasurer – We identified 27 checks totaling \$8,595 that were signed by and disbursed to the former Treasurer during our audit period. The current Treasurer did not write any checks to herself.

There was no evidence in meeting minutes or other documentation indicating these 27 disbursements had received prior approval, and 24 checks (89 percent) totaling \$7,595 were not recorded in the monthly summaries. The memo on one check for \$200 indicated Company officials would use the funds during a trip to pick up a truck the Company had purchased. Receipts were available to support this check, showing cash was used to purchase food and fuel on this trip. However, no documentation was available to support the remaining 26 checks totaling \$8,395.

The current Treasurer, current Assistant Treasurer, former Board President, former Chief and former Assistant Chief stated the Company would need cash on

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<sup>2</sup> See *The Company's Financial Records Were Deficient* section of this report for more information.



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occasion to make change for Company fundraising events. The current Assistant Treasurer said it was the former Treasurer's practice to obtain this cash by writing checks to herself and cashing them. Of the 26 unsupported checks to the former Treasurer, 19 checks totaling \$6,660 were written within one week prior to a fundraising event and/or included "Change Bank" in the check memo or on the check stub. The current Treasurer, current Assistant Treasurer, former Board President, former Chief and former Assistant Chief could not explain why the remaining seven checks totaling \$1,735 would have been needed, and said that it was improper for the Treasurer to have written these checks to herself.

Cashed Check – The former Treasurer endorsed and cashed a check for \$196 that was issued to the Company by New York State in June 2016 for the payment of foreign fire insurance tax proceeds. These funds generally must be used to benefit the Company as a whole, as determined by the membership. The current Treasurer, current Assistant Treasurer, former Board President and former Chief stated these funds should have been deposited into a Company account and it was inappropriate for the former Treasurer to have cashed this check.

### **The Company's Financial Records Were Deficient**

Officials did not develop written policies and procedures establishing internal controls over the recording of financial transactions or to properly account for cash collections and fundraising activities.

The monthly handwritten summaries completed by the Treasurers lacked essential details necessary to properly account for cash collections and disbursements. For cash collections, the manner of collection (i.e., cash or check), date of collection and date of deposit was not recorded. For disbursements, the manner of disbursement (i.e., check, debit card, cash or electronic withdrawal), date of disbursement and any associated check numbers were not recorded. The lack of details made it difficult to trace recorded cash collections and disbursements to bank activity as shown on monthly statements. In addition, running cash balances were not included in the monthly summaries. As a result, the Company's cash position could not be adequately assessed and was unknown until monthly bank statements were received. Furthermore, because the monthly summaries did not include cash balances, the Treasurers were precluded from performing monthly bank reconciliations that reconcile cash in the bank to cash in the records. These deficiencies likely went unnoticed because officials did not annually audit or otherwise review the Treasurers' records.

Beginning in October 2019, the current Treasurer recorded financial transactions in an electronic spreadsheet. The electronic records properly documented disbursements and included a running cash balance. However, the current Treasurer did not record the manner of collection and date of deposit for the cash collections.

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The Treasurers also did not maintain adequate documentation to support cash collections. The Treasurers did not issue press-numbered duplicate receipts to verify the receipt of funds when no other evidence was available. In addition, the former Board President stated cash collections from fundraising activities were generally given to the Treasurers at the end of each event without being counted or documented. Even when cash collections were counted and reconciled to ticket or meal sales, the reconciliation sheets were given to the Treasurers along with the fundraiser proceeds. As a result, the amounts shown on the reconciliations were not compared to the amounts deposited by the Treasurers to ensure they agreed.

No fundraising reports or reconciliation sheets were available for our audit period to show the collections received that should have been deposited. A total of \$278,086 was deposited into Company accounts during the audit period. Of this total, \$256,164 consisted of loan proceeds, electronic transfers, interest and checks, with the remaining \$21,922 deposited as cash. However, lacking documentation to support cash collections – especially cash (currency) collected through fundraising activities – amounts collected could have been misappropriated prior to deposit, and officials cannot ensure all fundraising proceeds were deposited in Company bank accounts and used to benefit the Company.

## **What Do We Recommend?**

Company officials should:

1. Identify duties and responsibilities for overseeing financial operations, which could include amending the bylaws.
2. Establish adequate internal controls and provide clear written guidance for key financial operations, including cash collections, fundraising, cash disbursements, claims processing, bank reconciliations, monthly financial reporting and recordkeeping requirements.
3. Discontinue using debit cards.
4. Routinely review the Treasurer's work (for example, review monthly bank reconciliations, bank statements and canceled check images, and compare collections to deposits).
5. Approve purchases in accordance with the bylaws and document the approvals.
6. Audit all claims prior to payment and only approve claims that are supported by adequate documentation and are an appropriate Company expense.

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7. Request and examine the Treasurer's financial records at least annually as required in the bylaws.
  8. Establish adequate internal controls to account for all cash collections.

The Treasurer should:

9. Perform monthly bank reconciliations and prepare written financial reports detailing all cash collections and disbursements activity.
10. Maintain accurate, complete and up-to-date financial records that include a running cash balance and sufficient detail to trace recorded cash collections and disbursements to bank activity.

# Appendix A: Response From Company Officials

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Morley Volunteer Fire Company  
7220 County Route 27  
Canton, New York 13617

To whom it may concern;

We the board of the Morley Volunteer Fire Company, strongly agrees to the New York State Comptroller's findings from the previous treasurer's misappropriation of funds. We also agree to the finding that the department did not properly provide enough oversight into the collection, disbursement, and or adequate recordings of the department's finances.

President of the Board  
Seth Bice

## Appendix B: Audit Methodology and Standards

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We conducted this audit pursuant to Article V, Section 1 of the State Constitution and the State Comptroller's authority as set forth in Article 3 of the New York State General Municipal Law. We obtained an understanding of internal controls that we deemed significant within the context of the audit objective and assessed those controls. Information related to the scope of our work on internal controls, as well as the work performed in our audit procedures to achieve the audit objective and obtain valid audit evidence, included the following:

- We interviewed officials and reviewed the Company's certificate of incorporation, bylaws, meeting minutes and financial records to obtain an understanding of financial operations, including any possible internal controls over cash collections, disbursements and the recording and reporting of financial activity.
- We assessed the adequacy of the Company's financial records and determined whether they contained the detail necessary to ascertain the Company's cash position and to properly account for all cash collections and disbursements.
- We interviewed officials and reviewed bank statements to determine whether the Company obtained loans during the audit period. We determined the Company's cash position at the time the loans were disbursed and on the last day of our audit period (December 31, 2019) to assess the Company's financial condition.
- We determined whether any former Company officials had signatory authority on bank accounts still active on December 31, 2019 and assessed the status of any such accounts.
- We reviewed all bank statements for unusual activity such as external transfers, in-person withdrawals, ATM transactions or other suspicious charges. We identified 143 such transactions totaling \$126,015 and interviewed officials and reviewed supporting documentation to determine whether the transactions were appropriate.
- We interviewed officials and reviewed meeting minutes to gain an understanding of the Company's revenue sources and obtained documentation from external parties evidencing 12 payments to the Company totaling \$185,592. We traced these payments to the financial records and deposits on bank statements to determine whether they were properly recorded and deposited.
- We examined all available deposit compositions and receipts, which we received from the Company's bank, and identified a total of \$16,290 cash back obtained on 28 deposits. We interviewed officials to determine the appropriateness of the cash back received.

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- We reviewed all 876 check, debit card and electronic disbursements totaling \$246,383 shown on bank statements from January 1, 2016 through December 31, 2019. From these, we identified 53 check payments to Company officials totaling \$15,354 and one check to “cash” for \$100. Using our professional judgment, we also identified 604 payments to vendors totaling \$104,880 that we considered to pose a higher risk of being improper (i.e., unusually large payments considering the vendor, even dollar payments, and payments to credit card companies, unrecognized vendors and vendors that sell items or services unrelated to Company operations). We reviewed all identified checks to officials, the check to cash and high-risk payments to determine whether they were approved prior to payment, supported by adequate documentation, properly recorded in the financial records and were legitimate Company expenses.
  - We reviewed all deposits into Company bank accounts from January 1, 2016 through December 31, 2019 totaling \$278,086 and identified the type (i.e., check, cash or electronic transfer) of funds deposited. We also reviewed transaction descriptions on bank statements and images of deposited checks to determine the source of deposited funds.

We conducted this performance audit in accordance with generally accepted government auditing standards (GAGAS). Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

Unless otherwise indicated in this report, samples for testing were selected based on professional judgment, as it was not the intent to project the results onto the entire population. Where applicable, information is presented concerning the value and/or size of the relevant population and the sample selected for examination.

Company officials have the responsibility to initiate corrective action. We encourage officials to prepare a written corrective action plan (CAP) that addresses the recommendations in this report and forward it to our office within 90 days. For more information on preparing and filing your CAP, please refer to our brochure, *Responding to an OSC Audit Report*, which you received with the draft audit report. We encourage officials to make the CAP available for public review.

## Appendix C: Resources and Services

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### **Regional Office Directory**

[www.osc.ny.gov/files/local-government/pdf/regional-directory.pdf](http://www.osc.ny.gov/files/local-government/pdf/regional-directory.pdf)

**Cost-Saving Ideas** – Resources, advice and assistance on cost-saving ideas

[www.osc.ny.gov/local-government/publications](http://www.osc.ny.gov/local-government/publications)

**Fiscal Stress Monitoring** – Resources for local government officials experiencing fiscal problems

[www.osc.ny.gov/local-government/fiscal-monitoring](http://www.osc.ny.gov/local-government/fiscal-monitoring)

**Local Government Management Guides** – Series of publications that include technical information and suggested practices for local government management

[www.osc.ny.gov/local-government/publications](http://www.osc.ny.gov/local-government/publications)

**Planning and Budgeting Guides** – Resources for developing multiyear financial, capital, strategic and other plans

[www.osc.ny.gov/local-government/resources/planning-resources](http://www.osc.ny.gov/local-government/resources/planning-resources)

**Protecting Sensitive Data and Other Local Government Assets** – A non-technical cybersecurity guide for local government leaders

[www.osc.ny.gov/files/local-government/publications/pdf/cyber-security-guide.pdf](http://www.osc.ny.gov/files/local-government/publications/pdf/cyber-security-guide.pdf)

**Required Reporting** – Information and resources for reports and forms that are filed with the Office of the State Comptroller

[www.osc.ny.gov/local-government/required-reporting](http://www.osc.ny.gov/local-government/required-reporting)

**Research Reports/Publications** – Reports on major policy issues facing local governments and State policy-makers

[www.osc.ny.gov/local-government/publications](http://www.osc.ny.gov/local-government/publications)

**Training** – Resources for local government officials on in-person and online training opportunities on a wide range of topics

[www.osc.ny.gov/local-government/academy](http://www.osc.ny.gov/local-government/academy)

## Contact

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