



FULTON COUNTY OFFICE OF THE COUNTY AUDITOR

2020

ANNUAL REPORT

ANTHONY L. NICKS, CIA, CFE, CGAP | COUNTY AUDITOR



MESSAGE FROM THE COUNTY AUDITOR



The Office of the County Auditor is an essential element of public accountability and transparency for Fulton County. As the County Auditor, I am charged with independent, objective assurance and advisory services to Fulton County Management in order to ensure the validity and reliability of fiscal and performance reporting of county-wide operations.

In this annual report, I have reported on the results of projects we undertook in 2020, provided a report on the Whistleblower Hotline activities, and reported on Title VI monitoring activities that are required by federal law. I am proud of our accomplishments and our contributions to Fulton County. Implementation of recommendations contained in our reports facilitates a more responsive and accountable municipal government.

Consistent with our mission, we believe that our auditing work adds value to Fulton County by promoting accountability, cost-effective municipal services, and ethical practices. In 2020, we tackled some tough issues, in the midst of a pandemic, that were both challenging and sensitive. I believe that by reviewing these issues, we were able to provide recommendations that will improve County services and provide better value for tax dollars.

I acknowledge the support and keen interest in our work that members of the Board of Commissioners and the Audit Committee demonstrate as we support them in their governance roles. I value my strong, open relationships with both of these governing bodies as these relationships are critical contributors to our success. I also appreciate the support and the cooperation that is extended to us by Fulton County's Administration. The continuation of this mutual cooperation is essential to our common goal of ensuring that the operations of the County are carried out in an efficient, effective, and economical manner.

In closing, I wish to pay tribute to my staff. The goals of the office were achieved in 2020 as a result of their hard work, perseverance, and commitment to delivering high quality, innovative, and cost-effective audit services. Their ability to willingly adapt and rise to new challenges and complexities in our work needs to be acknowledged. I am very fortunate to work with such a talented and professional group of individuals who are committed to the overall improvement of Fulton County government.

MISSION STATEMENT

Mission Statement:

The Office of the County Auditor exists to support the Board of Commissioners, the Audit Committee and the administration in the effective discharge of their responsibilities. Using knowledge and professional judgment, the Office of the County Auditor provides an independent appraisal of the County's financial, operational, and control activities.

The Office of the County Auditor reports on the adequacy of internal controls, the accuracy and propriety of transactions, the extent to which assets are accounted for and safeguarded, and the level of compliance with institutional policies and government laws and regulations. Furthermore, the Office of the County Auditor assists the County in accomplishing its objectives by bringing a systematic, disciplined approach to evaluate and improve the effectiveness of risk management, control, and governance processes.

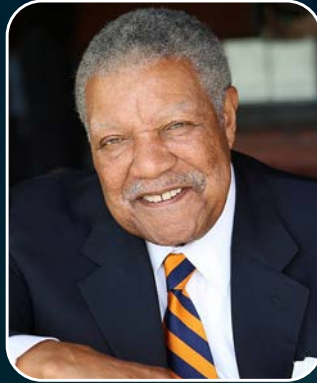


The Office of the County Auditor is charged with providing independent, objective assurance and advisory services such as:

- **Audits/Reviews** including performance, financial, operational, programmatic and compliance audits/reviews of County departments, programs, and services. In addition, follow-up audits are conducted to determine whether corrective actions have been implemented to adequately address previous audit findings. We also perform continuous monitoring of various business activities through the use of data analytic tools and techniques;
- **County-Wide Risk Assessment** that identifies and analyzes risks that may impair the County's ability to achieve its goals;
- **Title VI Monitoring** to ensure the County's compliance with Title VI of the Civil Rights Act of 1964;
- **Whistleblower Investigations** in response to allegations of fraud, waste, and abuse; and
- **Special Requests** from Elected Officials, County Manager, and the County Attorney that may consist of internal control reviews, departmental assessments, special projects/research assignments, and business process evaluations.

FULTON COUNTY BOARD OF COMMISSIONERS

The Office of the County Auditor has a direct reporting relationship to the Fulton County Board of Commissioners. This organizational structure maintains the department's independence and promotes broad audit coverage. We appreciate the Chairman of the Board and the Board of Commissioners for their support, transparency, and commitment to public service for the greater good of Fulton County Government and the valued county citizens.



**Chairman
Robb Pitts**
At Large



**Commissioner
Liz Hausmann**
District 1



**Commissioner
Bob Ellis**
District 2



**Commissioner
Lee Morris**
District 3



**Vice Chair
Natalie Hall**
District 4



**Commissioner
Marvin S. Arrington, Jr.**
District 5



**Commissioner
Joe Carn**
District 6

FULTON COUNTY AUDIT COMMITTEE

The Fulton County Audit Committee provides oversight of the internal audit function. The Committee is comprised of two members of the Board of Commissioners and three citizen members with expertise in the areas of accounting, auditing, internal control and local government operations. The Audit committee provides oversight and commitment to enhanced internal controls to support that “all people trust government is efficient, effective, and fiscally sound”.

2020 AUDIT COMMITTEE MEMBERS

COMMISSIONER BOB ELLIS

BOARD OF COMMISSIONER MEMBER

COMMISSIONER LEE MORRIS

BOARD OF COMMISSIONER MEMBER

PHILLIP HURD

CITIZEN MEMBER

ROBERT KONCERAK

CITIZEN MEMBER

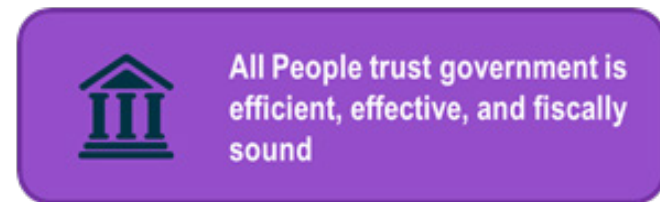
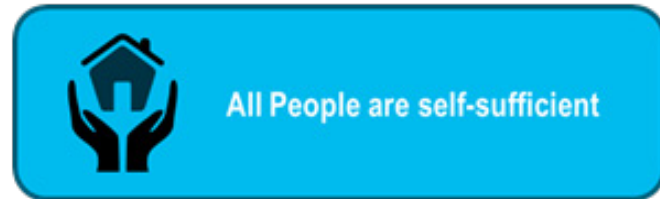
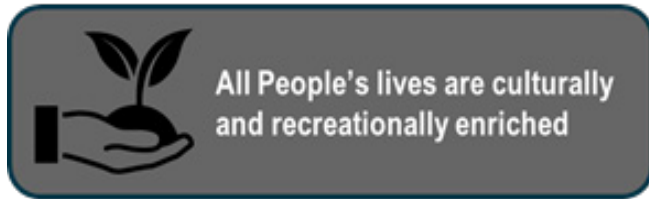
PAMELA MCCORKLE-BUNCUM

CITIZEN MEMBER



STRATEGIC PRIORITY AREAS

The Board of Commissioners developed a strategic plan and performance management system focused on results for our community and adopted six Strategic Priority Areas.



Based on the strategic plan, the Office of the County Auditor is aligned with “All People Trust That Government is Efficient, Effective, and Fiscally Sound” and “All People have Economic Opportunities”. The key performance indicators (KPIs) were established to describe and assess the standards of service and required performance to meet Fulton County’s strategic goals. This year, the office of the County Auditor exceeded all KPIs, which positively impacted the overall success of the County. In our normal course of business, we provide proven cost effective operational improvements and recommendations to departments that are intended to improve efficiency, effectiveness, preserve the integrity of county-wide departments, safeguard against waste and abuse, and ensure regulatory compliance. Making sound effective recommendations designed to improve business practices and internal controls ultimately protects the organization from misuse of taxpayer resources and create a sound, thriving and transparent government, which helps to strengthen public confidence. Our active participation in numerous countywide operations, initiatives and special projects provides that extra layer of confidence and helps to validate operational and programmatic decisions.

OFFICE OF THE COUNTY AUDITOR PERFORMANCE MEASURES

“All People Trust Government”

Office of the County Auditor Key Performance Indicator-Performance Measures	Annual Target 2020	Actual Amount 2020
Number of operational and mandated assessments managed that will improve County operations.	4	9
Percentage of agreed upon audit recommendations made to ensure departments have adequate internal controls in place to accomplish specific goals and objectives within the organization.	90%	99%
Number of completed audits/special requests/research/assignments/projects requested by the BOC, County Manager, County Attorney, Audit Committee, and Department Heads to ensure effectiveness	40	48
Percentage of Whistleblower Hotline cases reviewed within 24 hours of submittal to ensure complaints are handled in an appropriate, fair and equitable manner with the goal of resolving all complaints in a timely fashion with utmost objectivity and professionalism.	95%	100%

“All People Have Economic Opportunities”

Office of the County Auditor Key Performance Indicator-Performance Measures	Annual Target 2020	Actual Amount 2020
Number of Title VI site visits to ensure compliance with mandates/guidelines.	8	8
Number of training sessions/technical assistance provided to departments.	17	33

AUDIT HIGHLIGHTS

2020 AUDITS COMPLETED

- Probate Court Fiscal Support Division's Cash Management Procedures - Follow-up
- HOME Program Audit
- Purchasing Card - Follow-up
- Treasury Gift Card Audit
- Grady Memorial Hospital Memorandum of Understanding Compliance Report
- Georgia Security Immigration Compliance Audit
- Travel and Training Program Audit
- Project Level Up Review
- Library Construction Audit
- Fulton County Jail Food Services (Aramark) Audit



AUDIT

The word 'AUDIT' is written in large, bold, white capital letters on a red, brush-stroke-like background. A hand holding a black pen is visible in the bottom right corner, pointing towards the word.

2020 SIGNIFICANT AUDIT IMPACTS

Audit/Review:	Probate Court Fiscal Support Division's Cash Management Procedures-Follow-up
Audit Report Date:	March 17, 2020
Objective:	The objectives of the follow-up review were to review the processes and procedures that were implemented as a result of the findings and recommendations previously addressed, and evaluate the use of the Odyssey Financial Manager system to determine whether the case management system functions as intended for all fiscal operations of Probate Court.
Scope:	January 1, 2019 - December 31, 2019
Number of Findings:	2
Audit Impact	Based on our follow-up review, we determined seven (7) recommendations were implemented, three (3) recommendations were partially implemented, and one (1) finding is in progress. In addition, our review determined Probate Court does not have adequate internal controls in place to avoid the sharing of cash drawers and credit card machines. Additionally, we noted Probate Court's failure to prevent limited access to the safe. No audit response was provided.
Audit/Review:	HOME Program Monitoring Audit
Audit Report Date:	April 4, 2020
Objective:	The objective of this audit was to assess the effectiveness of procedures and controls implemented by the Fulton County Housing and Community Development Department (FCHCD) as it relates to the administration of the HOME Program.
Scope:	January 1, 2019 – June 30, 2019 (1st and 2nd quarter of 2019)
Number of Findings:	7
Audit Impact	During the audit, we identified insufficient staffing and program knowledge, non-compliance of HUD commitment deadline, failure to properly support staff labor distribution, lack of policies and procedures for the drawdown of funds, incomplete and missing documentation for the Tenant Based Rental Assistance (TBRA) program, failure to provide progress reports and failure to reconcile the County's Automated Management System (AMS) and the Federal Integrated and Disbursement Information System (IDIS) systems. As a result of our audit, the HOME program was fully staffed; the department has reassessed all funding allocations and is regularly monitoring expenditures of funds; staff will complete a semi-annual certification form to certify hours worked; strengthen its internal controls operating procedure for cash management/drawdowns; explore options to procure services to administer the monitoring and compliance related activities; and the reconciliation of HOME funds is expected to be completed.

Audit/Review:	Treasury Gift Card Audit
Audit Report Date:	July 29, 2020
Objective:	The objectives of the audit were to ascertain the effectiveness of the existing policies and procedures related to the procurement and distribution of gift cards and to determine the adequacy of controls over the departmental operating procedures to ensure compliance with the Treasury Gift Card Policies and Procedures.
Scope:	January 1, 2019 – December 31, 2019
Number of Findings:	2
Audit Impact	<p>Our review revealed that one (1) out of nineteen (19) or five percent (5%) of Gift Card Request Forms reviewed did not contain the signature of the Financial System Supervisor. We also noted a Gift Card Request Form did not contain the signature of the Department Head. Additionally, we were unable to trace eight (8) out of nineteen (19) or forty-two (42%) of transactions to the Treasury Gift Card log.</p> <p>As a result of our audit, the Department of Finance has taken steps to update both the Treasury Gift Card policy and the form for clarity, and the gift card log will be restructured and incorporated into the month-end process.</p>
Audit/Review:	Purchasing Card Program
Audit Report Date:	July 31, 2020
Objective:	The objectives of this audit were to determine whether the P-Card program is operating effectively and efficiently, and to determine the adequacy of the internal controls based on the procedures outlined in the Purchasing Card Manual.
Scope:	January 1, 2019 through December 31, 2019
Number of Findings:	9

<p>Audit Impact</p>	<p>Our review of the Purchasing Card program revealed the following:</p> <ul style="list-style-type: none"> • Purchase Card Administrator’s workload appear to be excessive; • Non-compliance with mandatory P-Card user training; • Failure to enforce the P-Card violations and penalties; • Failure to follow split invoice & single purchase transaction limit policy; • Lack of itemized receipts; • Failure to obtain proper signatures for reconciliation reports; • Failure to submit timely reconciliation packets; • Circumventing Treasury Department gift card policies; and • Separation of duties not enforced for cardholders and liaisons. <p>As a result of our review, the Department of Purchasing & Contract Compliance has requested and was approved for additional staff; however, due to COVID-19 a hiring freeze was approved; P-card user training will be implemented; cardholders are made aware of the split purchases policy; itemized receipts will be provided; reconciliation reports will be signed by all parties; user departments will be held accountable for late submittals; user departments are made aware that any need for purchase of gift cards must be made to the Treasury Division and separation of duties will be reviewed to determine best practice resolution for all parties involved.</p>
<p>Audit/Review:</p>	<p>Travel and Training Program Audit</p>
<p>Audit Report Date:</p>	<p>October 16, 2020</p>
<p>Objective:</p>	<p>The objectives of the audit were to determine if the Travel and Training Policy and all related procedures are enforced effectively and efficiently and to determine the adequacy of the internal controls set forth by the policy.</p>
<p>Scope:</p>	<p>January 1, 2019 through December 31, 2019</p>
<p>Number of Findings:</p>	<p>1</p>
<p>Audit Impact</p>	<p>During the audit, we identified three (3) instances where the Finance Department exceeded the allotted days required for reviewing and processing traveler reimbursements. In these instances, there was no documentation submitted to support what may have caused the delay in processing.</p> <p>As a result of our audit, the Finance department added an additional employee to address any delay in timely processing.</p>

Audit/Review:	Fulton County Jail Aramark Food Services Audit
Audit Report Date:	December 9, 2020
Objective:	The objectives of the audit were to evaluate the adequacy and effectiveness of the internal controls and quality of performance in the execution of responsibilities as it relates to compliance with the contract deliverables.
Scope:	January 1, 2019 – December 31, 2019
Number of Findings:	7
Audit Impact	<p>The audit identified deficiencies in organizational structure; lack of supporting documentation; invalid health certificates; inaccurate meal counts; inability to determine meal count submission date; untimely payment of invoices; and undocumented guest meal system.</p> <p>As a result of our audit, Aramark Correctional Services, LLC (Aramark) has revised its organizational structure; strengthened its internal review process in the areas of ensuring supporting documentation is provided and inmate meal count sheets; concurs that staff health certificates will be updated yearly; meal count sheets will be date stamped; will comply with the payment terms of contract; and has presented a meal ticket system for approval.</p>
Audit/Review:	Atlanta-Fulton Public Library System Audit
Audit Report Date:	December 23, 2020
Objective:	The objectives of the audit were to verify whether the completion of the Library's construction projects resulted in a savings and to determine if proper approvals were given for the monthly installment payments.
Scope:	The scope of this review focused on the start and completion of the Library Capital Improvement Project (CIP) Renovations, Phase II – Group 4 libraries for Fulton County Public Library System with dates ranging from August 2017 through July 2020.
Number of Findings:	1
Audit Impact	<p>Our audit of the Atlanta-Fulton Public Library System identified eight (8) of the nineteen (19), or 42%, pay applications reviewed did not reconcile back to their respective Schedule of Values (SOV) report. As a result, we were unable to verify the accuracy of the SOV and the pay applications.</p> <p>No audit response was provided.</p>



AUDIT HIGHLIGHTS

Analytical Reviews/Continuous Audits - 2020 Purchasing and Travel Card Analyses

We performed an analysis of purchasing and travel card transactions on a continual basis to monitor compliance and evaluate trends. Furthermore, this allowed us to take a proactive approach to revealing misuse of the cards. We imported data from Bank of America Works' card management system and established parameters for analyzing the data based on requirements as indicated in the purchasing and travel card manuals. Utilizing a data analytical software, we analyzed the data and developed scripts to create reports to identify any exceptions or irregularities. As a result of these analyses, management will:

- Strengthen oversight of card usage
- Increase enforcement of suspension or revocations of card privileges for violations
- Conduct mandatory annual refresher trainings for cardholders to emphasize the importance of adherence to purchasing and travel card policies and procedures.





FULTON COUNTY GOVERNMENT TITLE VI PROGRAM

“Protecting Your Civil Rights is Good Business”

The Office of the County Auditor is responsible for the administration and management of the Title VI program for Fulton County Government. As a recipient of federal financial assistance, the County is required to comply with various non-discrimination laws and regulation, including Title VI of the Civil Rights Act of 1964, as amended and the Civil rights Restoration Act of 1987 (P.L.100.259), which provides that “No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal assistance under this title or carried out under this title.” In addition, Fulton County takes reasonable steps to provide meaningful and equal access to services for persons with Limited English Proficiency (LEP).

In 2000, Executive Order 13166 - Limited English Proficiency (LEP), was signed into effect requiring federal agencies to assess and address the needs of otherwise eligible limited English proficient persons seeking access to the programs and activities of recipients of federal financial assistance. As of May 08, 2018, Fulton County utilizes the resource of a Qualified Foreign Language Line Service. This LEP service provides employees the ability to render oral interpretation and written translation assistance, at no additional cost, to County programs and services’ participants. The Office of the County Auditor is responsible for management of the service.

TITLE VI PROGRAM REVIEW SUMMARY

The Office of the County Auditor assists in providing assurance that every effort is made to follow these Title VI statutes and regulations by providing timely program management, monitoring, development, implementation, compliance reporting, technical assistance and training statutes and regulations enforced by the Office for Civil Rights.

In an effort to ensure and maintain federal compliance of the Civil Rights Act of 1964 and Fulton County's Title VI Policy #600-71, site monitoring and reviews are required for departments and subrecipients of Fulton County that receive federal dollars for programs and activities.

Title VI Reviews for 2020

- Fulton County Department of HIV Elimination Subrecipient – Southside Medical Clinic
Title VI Compliance Site Review
- Fulton County Department of HIV Elimination Subrecipient – Someone Cares, Inc.
Title VI Compliance Site Review
- Fulton County Department of HIV Elimination Subrecipient – National AIDS Education and Services for Minorities, Inc. (NAESM) Title VI Compliance Site Review
- Fulton County Department of HIV Elimination Subrecipient – Here's To Life, Inc.
Title VI Compliance Site Review
- Fulton County Department of HIV Elimination Subrecipient AIDS Healthcare Foundation
Title VI Compliance Site Review
- Fulton County Department of HIV Elimination Subrecipient – Aniz, Inc. Title VI Compliance Site Review
- Fulton County Department of HIV Elimination Subrecipient – DeKalb County Board of Health
Title VI Compliance Site Review
- Fulton County Department of HIV Elimination Subrecipient – Fulton County Board of Health
Title VI Compliance Site Review

TITLE VI PROGRAM IMPACTS

Reflected below are a few of the impacts of the Title VI Program:

- Ensured compliance for a total of \$28,591,721.40 in federal grant funds.
- Ensured federal legal mandated compliance, throughout the County, under Title VI of Civil Rights Act of 1964 as amended, Fulton County's Title VI Non-Discrimination Policy (600-71) and approved Limited English Proficiency (LEP) Policy by conducting eight site review visits, monitoring and training, consisting of eight grants, of County federally funded agency's subrecipients.
- Ensured County grant compliance by working in conjunction with departments' and agencies' subrecipients staff by providing Title VI technical assistance.
- Ensured Limited English Proficiency (LEP) compliance by maintaining the operation of the County's Translation Language Line Service, where County employees assisted over 1,700 callers who spoke foreign languages.
- Ensured compliance by providing 33 technical assistance projects, especially to:
 - Fulton County Board of Health during the Coronavirus disease public health pandemic, by rendering vital documentation translation for virus testing and results receipt and vaccine consent and release acknowledgment.
 - Fulton County Department of Communication in assisting with translating 2020 Census information awareness information.
 - Fulton County Department of Elections and Board of Health in providing "WE SPEAK" posters for placement throughout public areas.

PROGRAM ACCOMPLISHMENTS

The Federal Department of Health and Human Services issued an exemption waiver on June 19, 2020, waiving the annual site visit monitoring requirements as a result of the Coronavirus disease 2019 (COVID-19). Despite the exemption waiver, the Title VI Program was able to professionally perform the following accomplishments:

- Proficiently executed monitoring requirements during a public health pandemic
- Successfully carried out and succeeded the assigned program and department KPIs of 8 compliance visits and 33 technical assistances



COUNTY INITIATIVES AND PROJECTS

In addition to the standard functions of this office, the Office of the County Auditor responds to and prepares special research reports and completes project requests from the Board of Commissioners and the County Manager that are used in the decision-making process on administrative, budgetary and programmatic operations that impact Fulton County's operations. Staff members also participate in and serve on various county committees and focus groups in an effort to provide expert advice and recommendations on business processes and programs affecting County operations. Outlined below is a sampling of such:

Continuous Analysis of Purchasing Card and Travel Card Transactions
Continuous Monitoring of the HOME Program
Continuous Management and Oversight of the Whistleblower/Fraud Hotline Cases
Management of the Memorandum of Understanding Audit for Grady Memorial Hospital
Aramark Contract Review
Grady Customer Service/Satisfaction Measures
Risk Assessment Tool and Questionnaire Implementation
The Strategic Group for Open and Responsible Government
Open-Data Focus Team
NaphCare Contract Review – Follow-Up
Title VI Monitoring
Generation of the Audit Committee Report



The Office of the County Auditor in conjunction with the Office of the County Manager, serves as a liaison between the Fulton-DeKalb Hospital Authority and Grady Memorial Hospital. As a result, our office plays a significant role in advising, recommending and participating in negotiations for all contractual agreements with the Fulton-DeKalb Hospital Authority to support Grady Memorial Hospital. In addition, we monitor the payments made to Grady Memorial Hospital along with the contractual requirements as outlined in all agreements to ensure compliance, which ensures the best medical care and hospitalization services are being provided to the citizens of Fulton County.

“Grady Memorial Hospital opened in 1892 for the purpose of providing medical care to the medically underserved residents of the Atlanta community. From its earliest beginnings, Grady was operated by the City of Atlanta as a municipal hospital. By the 1940’s, Grady Memorial Hospital had developed relationships with Fulton and DeKalb counties. Thomas K. Glenn, a Georgia banker and business leader, is credited with the establishment of The Fulton -DeKalb Hospital Authority, a bi-county public body. In the early 1940s a legislative act established the foundation for Fulton and DeKalb counties to assume management of Grady Memorial Hospital. The Authority came into existence August 9, 1941 and assumed control of Grady on January 1, 1946. The Fulton-DeKalb Hospital Authority served as the governing and policy making body for Grady Memorial Hospital, managing its operations until 2008, when it leased the health system facilities to the Grady Memorial Hospital Corporation, a 17 member non-profit Board of Directors charged with administering the health system. Today, the Authority oversees the lease and continues to promote the operations of the Grady Health System. In addition, The Fulton-DeKalb Hospital Authority focuses on promoting the general health of the community and advocating for the indigent residents of Fulton and DeKalb Counties”.



OFFICE OF THE COUNTY AUDITOR 2020 ACCOMPLISHMENTS



- Completed 57 audits, special requests, research and assignments.
- 100 percent of Whistleblower Hotline cases were reviewed within 24 hours of submittal to ensure complaints were handled appropriately.
- Conducted presentations during new employee orientations to increase awareness of the Whistleblower Hotline. The total number of participants was 386 during 22 orientation sessions.
- Exceeded all key performance indicators.
- Earned a rating of 100 percent on customer service metric.

OFFICE OF THE COUNTY AUDITOR STAFF



**ANTHONY L. NICKS, CIA, CFE, CGAP
COUNTY AUDITOR**



**QUEENA JENKINS, CPA
DEPUTY COUNTY AUDITOR**



**STACY JONES
ASSISTANT AUDIT MANAGER**



**TRINA ALSTON, CPM
TITLE VI COORDINATOR**



**JOI HARGIS
AUDIT COORDINATOR**



**EBONY MCNEILL, CFE
INVESTIGATIVE ANALYST**



**TRACEE SHIELDS
AUDITOR III**



**JONNAH WILLIAMS
AUDITOR III**

OFFICE OF THE COUNTY AUDITOR PROFESSIONAL MEMBERSHIPS

- **American Institute of Certified Public Accountants**
- **Association of Certified Fraud Examiners**
- **Georgia Society of Certified Public Accountants**
- **Institute of Internal Auditors**
- **Association of Local Government Auditors**
- **Government Finance Officers Association Association of Certified Public Managers**

A LOOK TO THE FUTURE



The Office of the County Auditor is continually looking for ways to improve its operations. As a part of our 2021 outlook, we hope to continue to effectively and successfully implement the following activities and initiatives within the department:

- Introduction of audit surveys to senior management and audited departments
- Increased collaboration with the Audit Committee
- Deployment of the risk assessment questionnaire to additional departments
- Provide monitoring over programs that have been initiated by the County as a result to the pandemic.

Additionally, our 2021 goals and objectives include conducting a self-assessment with independent validation (peer review) to strengthen the office's quality control, improve processes and correct any shortcomings to enhance the public's confidence in our office, collaborate with the Department of Information Technology and Emergency Management to pursue a more effective risk management strategy, conduct more contractual audits to ensure effective management of the contract, and providing staff members with educational resources to pursue professional certifications.



FULTON COUNTY OFFICE OF THE COUNTY AUDITOR
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