

# COMPLIANCE AUDIT

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## Whitehall Township Volunteer Firefighters Relief Association of Lehigh County, Pennsylvania

For the Period  
January 1, 2023, to December 31, 2024

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February 2026



Commonwealth of Pennsylvania  
Department of the Auditor General

Timothy L. DeFoor • Auditor General



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TIMOTHY L. DEFOOR  
AUDITOR GENERAL

Mr. Gregory Unger, President  
Whitehall Township Volunteer  
Firefighters Relief Association of  
Lehigh County, Pennsylvania

We have conducted a compliance audit of the Whitehall Township Volunteer Firefighters Relief Association of Lehigh County, Pennsylvania (relief association) for the period January 1, 2023, to December 31, 2024. The audit was conducted pursuant to authority derived from Article VIII, Section 10 of the Constitution of the Commonwealth of Pennsylvania; Section 403 of The Fiscal Code, 72 P.S. § 403; and the Volunteer Firefighters' Relief Association Act ("VFRA Act"), see 35 Pa.C.S. § 7418.

The objectives of the audit were:

1. To determine if the relief association took appropriate corrective action to address the findings contained in our prior audit report.
2. To determine if the relief association complied with applicable state laws, contracts, bylaws, and administrative procedures as they relate to the receipt of state aid and the expenditure of relief association funds.

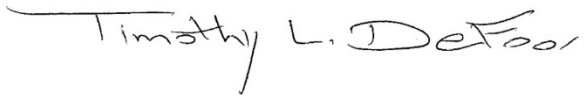
Our audit was limited to the areas related to the objectives identified above and was not, nor was it required to be, conducted in accordance with *Government Auditing Standards* issued by the Comptroller General of the United States.

Relief association officers are responsible for establishing and maintaining effective internal controls to provide reasonable assurance that the relief association's administration of state aid and accumulated relief association funds complies with applicable state laws, contracts, bylaws, and administrative procedures, including the safeguarding of assets. Relief association officers are responsible for complying with applicable state laws, contracts, bylaws, and administrative procedures. It is our responsibility to perform procedures to obtain sufficient, appropriate evidence to the extent necessary to satisfy the audit objectives. We believe that our audit provides a reasonable basis for our conclusions.

Based on our audit procedures, we conclude that, for the period January 1, 2023, to December 31, 2024:

- The relief association took appropriate corrective action to address the findings contained in our prior audit report.
- The relief association, in all significant respects, complied with applicable state laws, contracts, bylaws, and administrative procedures as they relate to the receipt of state aid and the expenditure of relief association funds.

The contents of this report were discussed with the management of the relief association. We would like to thank the relief association officials for the cooperation extended to us during the conduct of the audit.

A handwritten signature in black ink that reads "Timothy L. DeFoor". The signature is written in a cursive style with a horizontal line above the first few letters.

Timothy L. DeFoor  
Auditor General  
February 4, 2026

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## BACKGROUND

Pursuant to Article VIII, Section 10 of the Constitution of the Commonwealth of Pennsylvania,<sup>1</sup> Section 403 of The Fiscal Code,<sup>2</sup> and the Volunteer Firefighters' Relief Association Act ("VFRA Act"),<sup>3</sup> the Department of the Auditor General's duty is to audit the accounts and records of every volunteer firefighters' relief association to determine that funds received under the Foreign Fire Insurance Tax Distribution Law, commonly referred to as Act 205,<sup>4</sup> are properly expended.

The relief association is a charitable organization that was formed primarily to afford financial protection to volunteer firefighters and to encourage individuals to participate in volunteer fire service.

The VFRA Act governs the overall operation of volunteer firefighters' relief associations. Relief association bylaws define the specific operational procedures by which relief associations conduct business. To fulfill its primary purpose, the VFRA Act authorizes specific types of expenditures and prescribes appropriate volunteer firefighters' relief association investment options. Within the parameters established by the VFRA Act, it is the responsibility of relief associations to choose investments in a proper and prudent manner.

Volunteer firefighters' relief associations receive public tax monies, and the relief association officers therefore have a responsibility to the public to conduct the relief association's financial affairs in a businesslike manner and to maintain sufficient financial records to support the propriety of all relief association transactions. Volunteer firefighters' relief association officers are also responsible for ensuring that the relief association operates in accordance with applicable state laws, contracts, bylaws, and administrative procedures.

Act 205 sets forth the computation of the Foreign Fire Insurance Tax Distribution paid to each applicable municipality throughout the Commonwealth of Pennsylvania. The amount of the distribution is based upon the population of each municipality and the market value of real estate within the municipality. Upon receipt of this distribution, the municipality must allocate the funds to the volunteer firefighters' relief association of the fire service organization or fire service organizations that is or are recognized as providing the service to the municipality.

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<sup>1</sup> Pa. Const. Art. VIII § 10.

<sup>2</sup> 72 P.S. § 403.

<sup>3</sup> 35 Pa.C.S. § 7411 *et seq.*

<sup>4</sup> 53 P.S. § 895.701 *et seq.*

**BACKGROUND – (Continued)**

The relief association was allocated state aid from the following municipality:

<u>Municipality</u>	<u>County</u>	<u>2023</u>	<u>2024</u>
Whitehall Township	Lehigh	\$186,281	\$188,588

Based on the relief association’s records, its total cash and investments as of December 31, 2024, were \$2,109,056, as illustrated below:

Cash	\$ 245,763
Fair Value of Investments	<u>1,863,293</u>
Total Cash and Investments	<u>\$ 2,109,056</u>

## BACKGROUND – (Continued)

Based on the relief association’s records, its total expenditures for the period January 1, 2023, to December 31, 2024, were \$858,156, as noted below. The accuracy of these expenditures was evaluated as part of the Department’s audit to conclude on the relief association’s compliance with applicable state laws, contracts, bylaws, and administrative procedures as they relate to the receipt of state aid and the expenditure of relief association funds.<sup>5</sup> **The scope of the Department’s audit does not include the issuance of an opinion on the accuracy of these amounts.**

### Expenditures:

#### Benefit Services:

Insurance premiums	\$ 97,108
Relief benefits	4,025
Total Benefit Services	<u>\$ 101,133</u>

#### Fire Services:

Equipment purchased	\$ 290,600
Equipment maintenance	36,865
Training expenses	27,849
Fire prevention materials	6,180
Total Fire Services	<u>\$ 361,494</u>

#### Administrative Services:

Bond premiums	\$ 714
Officer compensation	6,050
Other administrative expenses *	13,103
Total Administrative Services	<u>\$ 19,867</u>

Total Investments Purchased	<u>\$ 375,622</u>
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#### Other Expenditures:

Sales tax paid **	<u>\$ 40</u>
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Total Expenditures	<u>\$ 858,156</u>
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\* A portion of the other administrative expenses represent \$7,800 expended in calendar years 2023 and 2024 for rent paid to hold meetings at the firehouses of the Whitehall Township Fire Department. In addition, \$4,037 of the other administrative expenses represents payments for annual internet access expended in calendar years 2023 and 2024 for three of the firehouses.

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<sup>5</sup> Accuracy was evaluated for a selection of transactions based on dollar amount, category, and/or random selection.

## **BACKGROUND – (Continued)**

\*\* During calendar years 2023 and 2024, the relief association made five insignificant disbursements totaling \$40 for the unauthorized payment of sales tax on purchases that were authorized under the VFRA Act. We disclosed these issues to relief association officials on December 22, 2025, but we did not include a finding in this report due to the relatively low dollar amount.

The volunteer firefighters' relief association and the affiliated fire service organization are separate, legal entities. The relief association is affiliated with the following fire service organization:

Whitehall Township Fire Department

WHITEHALL TOWNSHIP VOLUNTEER FIREFIGHTERS RELIEF ASSOCIATION OF  
LEHIGH COUNTY, PENNSYLVANIA  
STATUS OF PRIOR FINDINGS

COMPLIANCE WITH PRIOR AUDIT FINDINGS AND RECOMMENDATIONS

The relief association has complied with the prior audit findings and recommendations, as follows:

- Failure To Deposit Proceeds From The Sale Of A Jointly Purchased Vehicle

By receiving reimbursement of \$490 from Whitehall Township for its pro-rata share of the proceeds from the sale of the jointly purchased vehicle.

- Inadequate Internal Controls

By adopting sufficient internal control procedures to include a written policy governing the use of the relief association's debit card and ensuring that the secretary of the relief association signs and dates all meeting minutes to verify authenticity.

- Failure To Maintain A Complete And Accurate Equipment Roster

By maintaining a cumulative equipment roster of all relief association owned equipment.

We commend the relief association management for its efforts in complying with the findings and recommendations contained in the prior audit report. The relief association management should strive to remain in compliance with all applicable state laws, contracts, bylaws, and administrative procedures.

WHITEHALL TOWNSHIP VOLUNTEER FIREFIGHTERS RELIEF ASSOCIATION OF  
LEHIGH COUNTY, PENNSYLVANIA  
REPORT DISTRIBUTION LIST

This report was initially distributed to the following:

**The Honorable Joshua D. Shapiro**  
Governor  
Commonwealth of Pennsylvania

Whitehall Township Volunteer Firefighters Relief Association of Lehigh County, Pennsylvania  
Governing Body:

**Mr. Gregory Unger**  
President

**Mr. Aaron Schock**  
Vice President

**Ms. Nicole Rader**  
Secretary

**Mr. John Hersh**  
Treasurer

A report was also distributed to the following municipality, which allocated foreign fire insurance tax monies to this relief association:

**Mr. Randi Atiyeh**  
Secretary  
Whitehall Township

This report is a matter of public record and is available online at [www.PaAuditor.gov](http://www.PaAuditor.gov). Media questions about the report can be directed to the Pennsylvania Department of the Auditor General, Office of Communications, 229 Finance Building, Harrisburg, PA 17120; via email to: [news@PaAuditor.gov](mailto:news@PaAuditor.gov).