



Ethics
Commission

AUDIT MANUAL

Effective Date: October 27, 2020

I. INTRODUCTION

A. Objective

San Diego Municipal Code section 26.0414 mandates that the San Diego Ethics Commission [Commission] propose procedures for conducting audits of campaign, lobbying, and conflict of interest disclosure forms. The primary objective of this manual is to set forth standards and provide guidelines and procedures to assist staff in implementing this requirement.

B. Audit Standards

Each audit must conform to the *Commission's* auditing standards. These standards consist of general, fieldwork and reporting standards, and are set forth in Appendix A. To the extent possible, the audit standards of the *Commission* are those expressed in the U.S. Government Accountability Office's publication, Government Auditing Standards, 2018 revision, and generally accepted auditing standards as set forth by the American Institute of Certified Public Accountants (AICPA).

C. Definitions

Each word or phrase that is defined in this manual appears in the text of this section in italicized letters. For purposes of this manual, the following definitions shall apply:

Audit file includes any documents filed by a *committee*; *audit workpapers*; research conducted by the auditor; correspondence between the auditor and the *committee*; and any reports arising from previous audits of the *committee*.

Audit period means the period of time encompassing activities by the *committee* that are covered by the audit.

Audit workpapers means the documentation created by the auditor during the audit testing

Auditor notification letter means written correspondence sent by the auditor to a *committee* selected for an audit, scheduling the *initial meeting*, listing the records required for the audit, and enclosing an *audit questionnaire*.

Ballot measure committee means a *committee* organized to support or oppose the qualification or passage of a City measure for the ballot.

Bank reconciliation means a comparison of a *committee's* check register and bank statements for purposes of locating discrepancies.

Campaign audit means an audit of the financial activities of a *committee* organized to support or oppose a candidate or ballot measure in the City of San Diego. A *campaign audit* of a candidate-controlled committee may include the individual candidate's compliance with the City's Election Campaign Control Ordinance.

Campaign Audit Questionnaire means a written series of questions drafted by the auditor and submitted to the *committee* prior to the *initial meeting*. This questionnaire typically contains questions seeking background information regarding the *committee*, such as the names of principals and length of time organized as a *committee*.

Candidate committee means any *committee* that supports or opposes a candidate for elected office for the City of San Diego. A *candidate committee* may be a candidate-controlled committee or a committee that is not controlled by a candidate.

City Clerk means the duly appointed City Clerk of the City of San Diego or any authorized designee.

Commission means the City of San Diego Ethics Commission.

Commission notification letter means written correspondence sent by the *Commission* to a *committee* notifying it that it has been randomly selected for an audit.

Committees include *candidate committees*, and committees supporting or opposing City of San Diego ballot measures.

Draft audit report means a report prepared by the auditor at the conclusion of an audit, and submitted to the subject of the audit for review and comments. The *draft audit report* contains *material* findings regarding the activities of the subject of the audit.

Final audit report means a report prepared by the auditor at the conclusion of an audit, and either (1) contains no *material* findings; or (2) contains comments and explanations furnished by the subject of the audit in response to the *draft audit report*.

Form 410 means the Statement of Organization form required to be filed by any entity qualifying as a recipient *committee*.

Form 460 means the Recipient Committee Campaign Statement required to be filed by candidates and committees that have raised \$2,000 or more during a calendar year in connection with a City of San Diego election.

Form 496 means the Late Independent Expenditure Report required to be filed by *committees* that make independent expenditures of \$1,000 or more to support a single candidate or measure during the 90 days prior to an election.

Form 497 means the Late Contribution Report required to be filed by *committees* that make or receive contributions of \$1,000 or more during the 90 days prior to an election.

Form 501 means the Candidate Intention Statement required to be filed by any candidate who plan to receive contributions.

Form 700 means the Statement of Economic Interests required to be filed by any candidate for elected office in the City of San Diego.

High Level Filer means the Mayor, the members of the City Council, the City Attorney, City Manager (Chief Operating Officer), City Treasurer, City Comptroller, Chief Financial Officer, Chief Investment Officer, Investment Officers, members of the Planning Commission, members of the Funds Commission, members of the Retirement Board, members of the Defined Contribution Plan Board, any candidate for an elective office of the City, and any other individual whose position is specified in California Government Code section 87200.

Initial meeting means the first meeting between the auditor, treasurer, or representative of the *committee* selected for the audit. At this meeting, an overview of the audit process is explained, answers to the *audit questionnaire* are discussed, and internal policies and procedures of the *committee* are explained. Clarification may be sought with regard to any discrepancies the auditor may have found during the preliminary review.

Internal control means the policies and procedures implemented by a *committee* for conducting its business.

Lobbyist means any individual who engages in lobbying on behalf of a client and any individual owner, compensated officer, chairperson, or employee who engages in lobbying on behalf of an organization lobbyist. Lobbyist also means any individual owner, compensated officer, chairperson, or employee who has been designated on a lobbying firm's or organization lobbyist's registration form as being expected or authorized to lobby.

Lobbyist audit means a review of the financial activities of a *lobbyist* registered with the City of San Diego to ensure compliance with local lobbying laws.

Local Code Filer means any City board member, and any employee of the City, except for classified employees, who is required to file a Statement of Economic Interest pursuant to a conflict of interest code adopted by City Council.

Material means having significant importance. Factors that may be considered in determining materiality are: 1) significance of dollar amounts; 2) significance of percentages; 3) importance of item to purposes of State or local law; 4) frequency of occurrence; and 5) nature of transaction. A consideration in determining the materiality of errors in situations involving other than dollar amounts is whether the item or party can reasonably be identified. Parties that should be identifiable in the filings include the filers, employees, payees, subvendors, contributors, guarantors, *committees*, and beneficiaries.

Post audit conference means the meeting between the auditor and a representative of the *committee* selected for the audit, held after the completion of the audit testing, and after the *committee* has had a reasonable opportunity to review the *draft audit report*.

Preliminary audit tests means a review of the *committee's* campaign statements to determine whether the *committee* submitted the required filings and whether such filings contained all of the required information.

Primarily formed committee means a *committee* which is formed or exists primarily to support or oppose a candidate or ballot measure.

Sampling means selecting pieces of data that are extrapolated to make conclusions regarding the entirety of data that is the subject of the audit.

II. AUDIT SELECTION PROCESS

Audit selection shall be based on the following *Commission* approved guidelines:

A. Campaign Audits

During every odd numbered year, the *Commission* shall schedule a random drawing of *committee* names at a meeting open to the public. This meeting shall take place prior to September 15 unless the *Commission* has good cause for scheduling the meeting on a later date.

Prior to the date of the random drawing, the *City Clerk* shall determine the qualifying pools of *committees* potentially subject to audit. The qualifying pools consists of (1) every *candidate committee* that supported or opposed a candidate who sought elective City office at a regular or special election held within the previous two calendar years; and (2) every *ballot measure committee* formed to support or oppose a ballot measure at a regular or special City election within the previous two calendar years. The *City Clerk* shall then determine the level of financial activity for each qualifying *committee* based on the following:

- The total of all contributions (monetary and non-monetary) and loans received by the *Committee* through June 30 of the current year.

The *City Clerk* shall then categorize all qualifying *committees* according to the chart below:

Level of Financial Activity	Candidate Committees	Ballot Measure Committees
\$100,000 or more	100%	100%
\$ 50,000 - \$99,999	75%	75%
\$ 15,000 - \$49,999	25%	25%

All qualifying *committees* will be subject to a random drawing, with the following exceptions:

- Prior to the random drawing, the *Commission* shall determine whether any *committee* on the list is the subject of a pending enforcement action by the *Commission* and consider whether such *committee* should be subject to the audit selection process.
- The *Commission* may, subject to its discretion, instruct the *City Clerk* to refrain from placing into a pool the name of any *committee* that meets all of these criteria: (a) the enforcement action is based, in whole or in part, on an alleged violation of the City's Election Campaign Control Ordinance; (b) a formal investigation has been approved by the *Commission* with regard to the alleged violation; and (c) an audit of the *committee* would likely require duplicative efforts of *Commission* staff or otherwise result in an inefficient use of *Commission* resources.

The number of *committees* selected for audit shall be based on the following:

- 100% of the *committees* with financial activity of \$100,000 or more will be selected for audit; and
- 75% of the *committees* with financial activity of \$50,000 to \$99,999 will be selected for audit; and
- 25% of the *committees* with financial activity of \$15,000 to \$49,999 will be selected for audit; and
- The percentages specified above will be applied to both types of *committees* separately; and
- At least one audit shall be selected from every category containing one or more *committee*.

If the percentages specified above result in a fraction, any fraction .5 and above will be rounded up to the next whole number, and any fraction less than .5 will be rounded down to the next whole number, except in cases where the percentage results in less than one *committee* selected. The *Commission* will audit at least one committee in each of the six categories outlined above.

At the meeting in which the random drawing is conducted, the *City Clerk* shall present a list of the names of the *committees* subject to the random drawing. The *City Clerk* shall print the name of each *committee* on a separate piece of paper and place each *committee* name in its respective pool. Each piece of paper shall be indistinguishable from every other piece of paper except for the name of the *committee*. The *City Clerk* shall draw the *committee* names from the audit pools in a manner that ensures that the selections are made on a purely random basis.

If a *committee* controlled by a candidate is selected for audit at the random drawing, any other *committees* controlled by the same candidate during the audit period shall be included in the audit. A candidate controls a *committee* if he or she, his or her agent, or any other *committee* he or she controls has a significant influence on the actions or decisions of the *committee*.

The *Commission* shall send a *Commission notification letter* to each *committee* selected for audit. The *Commission notification letter* shall be sent without undue delay following the selection process described above. The *Commission notification letter* shall alert the *committee* of imminent contact by the auditor selected to conduct the audit.

In addition to the *committees* chosen in the random selection process, the *Commission* may audit *committees* as a result of a complaint that leads to an investigation, regardless of the *committee's* level of financial activity.

B. Lobbyist Audits

The *City Clerk* will conduct reviews of Lobbyist Registration and Quarterly Reports for compliance with the reporting requirements set forth in Chapter 2, Article 7, Division 40 of the San Diego Municipal Code [SDMC], entitled "Municipal Lobbying." Deficiencies noted by the *City Clerk* may be referred to the *Commission* for possible investigation as a complaint.

The *Commission* will review and monitor *lobbyist* Quarterly Reports twice a year to ensure that *lobbyists* properly report activity expenditures.

C. Conflict of Interest Forms

The *Commission* will not conduct audits of Statement of Economic Interest (SEI) forms filed by City Officials or candidates for elected office. The *City Clerk* will review these statements. Irregularities noted by the *City Clerk* may be referred to the *Commission* for possible investigation as a complaint.

As part of the review of *lobbyist* activity expenses, the *Commission* will review and monitor Schedules D and E of the SEI's of *high level filers* and *local code filers*.

III. AUDIT PROCESS AND PROCEDURES

A. Campaign Audits

1. Audit Notification

The auditor shall send an *Audit Notification Letter* to every *committee* selected for audit. This letter shall inform the *committee* of the audit commencement and shall identify the *audit period*. The *Audit Notification Letter* shall also contain a list of documents required for the audit (see Appendix B) and the *Campaign Audit Questionnaire* (see Appendix C). The letter will include a request that the *committee* complete and return the *Campaign Audit Questionnaire*, along with the committee's bank statements and check register, prior to the *initial meeting*.

2. Preliminary Work

The auditor shall make all reasonable efforts to minimize the time, effort, and expense required of the *committee* in complying with these audit procedures. In the event that the *committee* is audited by the California Fair Political Practices Commission [FPPC] during the same calendar year, the auditor shall audit the *committee* chosen during its random drawing based only on those local regulations that are not part of the FPPC's regulations.

The auditor shall attempt to complete preliminary work prior to the initial interview or examination of the filer's records. The preliminary work includes:

- a. Obtain *committee* campaign statements and reports from the *City Clerk* (Appendix D). Review the statements and reports for completeness, timeliness and mathematical accuracy.
- b. Review any prior *audit workpapers*.
- c. Review completed *Campaign Audit Questionnaire*.
- d. Review or perform *bank reconciliation*.
- e. Prepare *audit file*

By reviewing the *Campaign Audit Questionnaire* and reviewing or completing the *bank reconciliation* prior to the *initial meeting*, the auditor will be able to identify discrepancies and determine the extent of the audit testing.

3. Conducting the Initial Meeting and Evaluating Internal Control

At the *initial meeting*, the auditor shall provide an overview of the audit process to the *committee* and answer any questions its representatives may have. The auditor may ask questions regarding the policies and procedures under which the *committee* operated and request additional information if needed. The auditor may ask the representative(s) to clarify any discrepancies the auditor may have found during the preliminary review or to explain in detail the responses that were provided on the *campaign audit questionnaire*.

Topics for discussion include, but are not limited to:

- Organizational structure: review staffing functions and the division of responsibilities.
- Obtain organizational chart if available, or create one as part of the *audit workpapers* if it would be useful. Review the relationship between *committee* and candidate.
- A general description of how the *committee* operated. Ask for a general description of how funds were raised (e.g., luncheons, dinners, cocktail parties, neighborhood meetings, door-to-door solicitations, sales, etc.). Determine what type of advertising was used to promote the candidate/issue(s) (e.g., TV and radio spots, newspapers, literature, promotional gifts, etc.).
- Written literature: Ask for any brochures or similar literature used during the campaign.
- Records required to begin audit, which had been previously requested.
- Items disclosed by preliminary work that need to be discussed/clarified at this time.

The auditor shall obtain detailed information about the accounting controls practiced by the *committee*. Obtaining such information will allow the auditor to evaluate the *committee's internal control* structure. *Internal control* is a coordinated system of procedures and techniques designed to safeguard an entity's assets, to ensure the accuracy of its accounting records, and to promote efficiency and adherence to prescribed policies. Note that the majority of campaign *committees* do not maintain a rigid system of *internal control*. Based on the completed *campaign audit questionnaire* and *initial meeting*, the auditor can evaluate the extent to which records are reliable. Factors affecting this evaluation include additional interviews, the general condition of the records, the results of the *bank reconciliation*, and results of an initial sample. The auditor must document the study and evaluation of *internal control*. Examples of criteria to be used for evaluating *internal control* are set forth in Appendix E.

4. Audit Testing

Compliance testing will be performed to determine whether a *committee* complied with the specific requirements of local law. Substantive testing is used to test for the existence of a transaction, proper record keeping, and accuracy in disclosure. It is possible to conduct one test while simultaneously conducting part or all of another test. The extent of audit testing will be unique based on committee size, and the results of the preliminary work and evaluation of *internal controls*. Examples of criteria to be used for evaluating the extent of audit testing are set forth in Appendix F.

The review of the records may be performed at the auditor's place of work or the location where the records are maintained. Once the auditor has access to the records, he/she can conduct the necessary testing. The records should include statements and reports that were filed by the *committee* and supporting documentation regarding transactions.

The auditor must document in the *audit workpapers* all the tests conducted. The *audit workpapers* shall also contain sufficient documentation regarding findings and documentation of requests for additional records or explanations provided by the *committee*. Documentation includes:

- A written record of relevant facts, figures and sources of information
- Photocopies of source documents when appropriate
- The objectives, criteria and methodology used for each audit test as well as the auditor's conclusions based on the findings of the testing performed.

5. Draft Audit Report and Review of Audit

After the auditor has completed all audit testing, documented the results of all audit tests in the *audit workpapers*, and completed the *draft audit report*, the audit supervisor shall review the *draft audit report*, *audit file*, and *audit workpapers* for:

1. Depth, scope and adequacy of content and procedures
2. Application of written policy and procedures
3. Adequacy of presentation
4. Documentation of exceptions
5. All *material* findings to ensure that findings discussed in the *audit workpapers* are included in the audit report

The supervisor will review the materiality of all findings. If the supervisor disagrees with the auditor's determination of materiality, both the auditor and supervisor shall review the circumstances again and reconsider the materiality conclusion. A determination shall be made regarding whether to amend the *draft audit report* prior to the scheduling of the *post-audit conference*. Once the *audit workpapers* and

draft audit report have been reviewed by the supervisor, the *draft audit report* will be given to the *committee* for review prior to the *post-audit conference*.

6. Post-Audit Conference

A *post-audit conference* will be conducted at the completion of the audit testing, and after the *committee* has had a reasonable opportunity to review the *draft audit report*. The purpose of the *post-audit conference* is to discuss audit findings with the *committee*. In discussing the audit findings, the auditor shall also discuss the positive aspects of the *committee's* records. Each finding shall be fully explained. The *committee* may provide comments and explanations regarding the *material* findings.

The auditor shall inform the *committee* that a *final audit report* will be forwarded to the *Commission* and may result in the initiation of a formal investigation or the preparation of a Draft Administrative Complaint and Probable Cause Report.

7. Final Audit Reports

After the *draft audit report* has been discussed with the *committee* at the *post audit conference*, the auditor shall prepare the *final audit report* and submit it to the *Commission*. The auditor may, in the *final audit report*, note any explanations and arguments raised by the *committee*. See Appendix G for a *final audit report* template.

If the audit produces no *material* findings the auditor shall prepare a *final audit report* and submit it to the *Commission* during open session.

If the *final audit report* contains *material* findings, the *Commission's* Executive Director shall present the report at a closed session meeting of the *Commission*. At this meeting, the *Commission* shall vote on whether the *material* findings contained in the *final audit report* warrant the initiation of a complaint. The *Commission's* consideration of the material findings shall be conducted in a manner essentially identical to its handling of a complaint that has been processed through the Preliminary Review stage and become subject to the *Commission* determination stage set forth in section 26.0423 of the San Diego Municipal Code. The *Commission* may instruct the *Executive Director* to either initiate a formal investigation or prepare a Draft Administrative Complaint and Probable Cause Report against the *committee* that is the subject of the audit.

After the *final audit report* has been presented to the *Commission* it shall be sent to the *committee* and posted to the *Commission's* website.

B. Lobbying Audits

1. Preliminary Work

Twice a year, the auditor will request the *City Clerk* provide:

- a. a list of all registered lobbyists for that calendar year; and
- b. all Lobbyist Disclosure reports from the prior two calendar quarters; and
- c. the Statements of Economic Interest (SEI's) for all *high level filers* and selected *local code filers*

The auditor will prepare a spreadsheet of all registered lobbyists sorted by (1) lobbyist name, (2) employer, and (3) client. The auditor will also prepare spreadsheets of all gifts disclosed on the Lobbyist Disclosure reports and all gifts disclosed by *high level filers* and selected *local code filers* on their SEI's.

2. Audit Testing

The auditor shall compare gifts disclosed by *lobbyists* to gifts disclosed by *high level filers* and *local code filers* to determine whether lobbyists properly reported activity expenses during the reporting period. Any discrepancies shall be described in the *draft audit report*. All *audit workpapers* shall be organized in the *audit file* and shall support any *material* findings contained in the *draft audit report*.

3. Audit Review and Lobbyist Contact

After the auditor has completed all audit testing, documented the results of all audit tests in the *audit workpapers*, and completed the *draft audit report*, the audit supervisor shall review the *draft audit report* and *audit file*. If the supervisor disagrees with the auditor's determination of materiality, both the auditor and supervisor shall review the circumstances again and reconsider the materiality conclusion. A determination shall be made regarding whether to amend the *draft audit report* prior to contacting only *lobbyists* identified in the *draft audit report*.

The auditor shall contact all *lobbyists* who are mentioned in a *material* finding to obtain his or her response and/or explanation of the situation surrounding the gift in question. If the *lobbyist* provides additional documentation or a written explanation that may affect the *materiality* of a finding, the auditor shall review such information, and may reconsider the findings.

4. Final Audit Report

After the *material* findings contained in the *draft audit report* have been discussed with the *lobbyist(s)* the auditor shall draft the *final audit report* and submit it to the *Commission*. The auditor may, in the *final audit report*, note any explanations and arguments raised by the *lobbyist(s)*. If the audit produces no *material* findings the auditor shall prepare a *final audit report* and submit it to the *Commission* during open session.

If the *final audit report* contains *material* findings, the *Commission's* Executive Director shall present the report at a closed session meeting of the *Commission*. At this meeting, the *Commission* shall vote on whether the *material* findings contained in the *final audit report* warrant the initiation of a complaint. The *Commission's* consideration of the material findings shall be conducted in a manner essentially identical to its handling of a complaint that has been processed through the Preliminary Review stage and become subject to the *Commission* determination stage set forth in section 26.0423 of the San Diego Municipal Code. The *Commission* may instruct the *Executive Director* to either initiate a formal investigation or prepare a Draft Administrative Complaint and Probable Cause Report against the *committee* that is the subject of the audit.

After the *final audit report* has been presented to the *Commission* it shall be sent to the *lobbyist(s)* and posted to the *Commission's* website.

APPENDIX A

AUDIT STANDARDS

A. General Standards

1. The auditor must have adequate technical training and proficiency.
2. The auditor must maintain independence in mental attitude in matters relating to the assignment.
3. The auditor must exercise due professional care in the performance of the audit and in the preparation of the report.

B. Standards of Fieldwork

1. The work must be adequately planned and assistants, if any are used, must be properly supervised.
2. There must be a proper study and evaluation of *internal control*.
3. Sufficient competent evidentiary material must be obtained through inspection, observation, inquiries, and confirmation to afford a reasonable basis for an opinion regarding the reports and statements under examination.
4. A review must be made of compliance with legal and regulatory requirements.

C. Standards of Reporting

1. At the completion of every audit, written audit reports must be prepared and issued.
2. Audit reports containing violations must be forwarded to the appropriate enforcement agency.
3. Reports are to be issued as promptly as possible so that the information is available for timely use by enforcement agencies.
4. The content of each report must include:
 - a. A statement and explanation of the scope of the audit.
 - b. Documentation of instances of *material* non-compliance with any legal/regulatory requirements.
 - c. Relevant explanations made by filers and, if appropriate, the auditor's comments on those explanations.

5. Preparation, review and processing procedures must be applied to produce reports that contain no omissions of material findings or errors of fact, logic or reasoning.
6. Findings must be presented in an objective and unbiased manner and must include sufficient information to provide readers with proper perspective.

APPENDIX B

LIST OF RECORDS REQUIRED FOR THE AUDIT¹

I. Documents to request from Committee Treasurer prior to initial meeting:

- Copies of Bank Statements for entire audit period
- Copies of Check registers for the entire audit period
- Completed Campaign Audit Questionnaire

II. Documents to have available during the audit testing:

- Financial Statements (Balance Sheet and Income Statements)
- Accounting ledgers and journals
- Deposit records including:
 - ✓ Deposit Slips
 - ✓ Contribution envelopes
 - ✓ Contributor checks
- Disbursement records including:
 - ✓ Cancelled checks
 - ✓ Vendor Invoices
- Any and all Loan documents
- Petty cash fund: register, logs, receipts, vouchers
- Lease or rental agreements, receipts, bills, invoices
- Vendor contracts

¹ Additional records may be required for completion of the audit.

APPENDIX C

CAMPAIGN AUDIT QUESTIONNAIRE

FOR THE PERIOD OF January 1, 20__ through December 31, 20__

1. List the names and duties of campaign advisors and/or managers. If applicable, list name(s) and period(s) of time for past treasurer(s) within the period indicated above.

2. If the committee had full time employees or employed public relations, advertising, or consulting firms, please provide their names.

3. Who was responsible for the accounting procedures?

4. Who maintained the committee' s records? Where were they maintained?

5. Who prepared the filed statements?

6. The committee' s campaign headquarters were located at:

7. Was the space rented or donated? From whom?

CONTRIBUTIONS

8. How were contributions solicited?

Telephone

Mail

Fundraisers

Other (describe below)

9. Please explain how contributions were processed and recorded from the time they were received to the time they were deposited.

10. In preparing the campaign statements, how was the date-of-receipt for contributions determined and what records are available to document this date?

11. How were cumulative amounts for contributors determined?

12. Please provide the following information for all the committee's financial accounts. (Checking, savings, certificates of deposit, money market accounts, and any other accounts in which funds were placed.)

Type of Account	Account Number	Name and Address of Financial Institution	Date Opened	Date Closed
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____

Please make available all of the bank statements for the accounts listed above. The statements should cover the audit period and the month before and the month after the audit period.

13. Did the committee receive any pledges (enforceable promises to make a payment)? Please explain the nature of form of payment promised.

1. If fund raising activities were utilized, please complete the following:

Date	Description of Activity	Person in Charge
_____	_____	_____
_____	_____	_____
_____	_____	_____

Please have available copies of any fund raiser budgets or recaps for each activity.

15. What types of records were maintained for contributions?

a. _____ copies of contributor checks. Indicate order in which file is maintained.

_____ Date of deposit

_____ Date of receipt

_____ other, please explain

b. _____ duplicate deposit slips

c. _____ contributor card file

d. _____ contributor ledger

e. _____ cash receipts journal

f. _____ computer file, what software was used:

g. _____ other, please explain:

16. Did the committee maintain copies of notices sent to major contributor? If so, please have them available for audit.

17. How were non-monetary contributions valued and by whom?

Please have available copies of documentation to verify the value of non-monetary contributions.

18. How were late contributions identified and reported?

If late contribution reports were filed, please have them available for the audit.

EXPENDITURES

19. Who approved payments for expenses incurred on behalf of the committee?

20. Provide names of individuals authorized to sign on the committee' s checking account(s).
21. How many signatures were required on the committee' s checks?
22. What types of records were maintained for expenditures?
- a. _____ invoices and receipts file. Indicate order in which file is maintained:
 - _____ check numbers
 - _____ dates paid
 - _____ period or sequence as reported on campaign statements
 - _____ other, please explain:
 - b. _____ card file
 - c. _____ expenditures/disbursements journal
 - d. _____ canceled checks
 - f. _____ other, please explain
23. Are all disbursements or payments supported by an invoice or receipt?
24. Were any expenses paid from personal funds? If so, please have the invoices and the canceled checks available for the audit.
25. How were accrued expenses determined by the committee?
26. If the committee utilized a bulk rate postal account, please provide bulk rate number and address of post office.
27. If the committee utilized phone banks, please indicate how many, location, and names of person in charge

28. If there was a petty cash fund, how were the funds controlled and by whom?

29. If any loans were made or received by the committee, do you have written loan agreements for all the loans?

These responses were completed by:

Print Name

Signature

Title

Date

Please retain a copy for your records.

APPENDIX D

LIST OF DOCUMENTS TO REQUEST FROM CITY CLERK

Form 501 – Candidate Intention Statement

Form 410 – Statement of Organization

Form 460 – Recipient Committee Campaign Statements

Form 496 – Late Independent Expenditure Report

Form 497 – Late Contribution Report

Form 700 – Statement of Economic Interests

APPENDIX E

CRITERIA FOR INTERNAL CONTROL

- A. The following criteria can be used to study and evaluate *internal control*:
1. Size, type and scope of operation
 2. Scope-determine what *internal controls* the entity has in effect
 3. Review-determine if the existing system is adequate for that entity
 4. Test-determine if the prescribed procedures are being followed by the particular entity
 5. The records that are maintained
 6. The methods, completeness and accuracy of the records maintained
 7. The relative importance of requirements that are not met
- B. Some criteria essential to adequate *internal control* include:
1. The person who keeps the books should not have access to cash. Approving purchases and paying functions should be kept separate.
 2. All receipts should be recorded immediately and deposited intact without delay. Duplicate copies of deposit slips should be maintained.
 3. Bank statements should be reconciled with the *committee's* books or records.
 4. Procedures should be established for signing checks. Checks for campaign expenditures over a certain amount should require more than one signature and/or written authorization for payment. Blank checks should not be signed.
 5. Records of receipts and expenditures should be maintained in such a manner as to show required cumulative totals.
 6. Original source documents must be maintained in addition to the *committee's* own data records. Source documents include letters/remittance envelopes from contributors that contain contributor information. The *committee's* data records may consist of a spreadsheet that records corresponding contributor information.
 7. If a petty cash fund for small disbursements is created, a receipt or written voucher should be maintained for all cash expenditures. A running petty cash register should also be maintained.
 8. With the exception of petty cash disbursements, all expenditures should be made by serially pre-numbered checks.

APPENDIX F

EXTENT OF AUDIT TESTING

A. Sample Selection for Campaign-Related Audits

In large audits it is often impossible to review every piece of data. *Sampling* not only speeds the operation of the audit but also reduces its costs. Because the AICPA accepts conclusions based on *sampling* as valid, *sampling* techniques may be used in all audit areas. The auditor shall determine when and where *sampling* is appropriate and select the method of *sampling*. The extent of *sampling* should be dependent on the evaluation of *internal control*. (That is why *internal control* must be evaluated prior to beginning testing.)

B. Representative Samples

Factors affecting the size of the sample shall include *internal control* procedures; prior audit reports; organization of the records; the experience of the record-keeper; the nature of the *committee's* activities; information from outside sources; and the volume, size, and source of contributions. It is important to note that sample testing will not necessarily detect isolated exceptions. However, a representative sample will probably provide an accurate picture of the area as a whole. Some suggested methods for selecting a sample are:

1. Statistical *sampling*
2. Judgmental *sampling*:
 - Select every 3rd 4th 5th item, etc.
 - Audit all transactions on selected statements filed. (Based on activity, dollar volume, etc.)
 - Stratify contributions according to dollar amount such as \$100-\$250, \$250-\$1000, \$1000 and over, and then apply another method.
 - Select contributions from the filer's records based on alphabetical order.
 - Select contributors based on profession/business.
 - From a very large universe of items, select small segments from various locations within the universe.
 - Select expenditure transactions occurring in specific months or weeks based on records, i.e., checks, invoices and ledger.
 - Select expenditure transactions based on type of vendor.
 - Select expenditure transactions based on alphabetical order, check numbers or invoice numbers.

APPENDIX G

FINAL AUDIT REPORT

Date:

Committee/Candidate

Street Address

City, State, Zip

Treasurers: Name

Street Address

City, State, Zip

SAN DIEGO ETHICS COMMISSION

AUDIT REPORT:

(Committee Name)

I. Introduction

This Audit Report contains information pertaining to the audit of the committee, _____ Identification Number _____ (“the Committee”) for the period from _____ through _____. The Committee was selected for audit by a designee of the City Clerk in a random drawing conducted at a public meeting of the Ethics Commission held on (date). The audit was conducted to determine whether the Committee materially complied with the requirements and prohibitions imposed by the City of San Diego’s Election Campaign Control Ordinance (San Diego Municipal Code Chapter 2, Article 7, Division 29).

During the period covered by the audit, the Committee reported total contributions of \$ _____ and total expenditures of \$ _____. **The audit revealed no material findings. The Committee substantially complied with the disclosure and record-keeping provisions of the Act and the San Diego Ethics Ordinance. Or The audit revealed _____ material finding(s): The Committee failed to _____ in violation of Government Code Section _____.**

II. Committee Information

On _____, 200x the Committee filed a Statement of Organization with the San Diego City Clerk indicating that it qualified as a committee. The Committee was formed to support the election of _____ for _____ in the _____, 200x election. On _____, 200x the Committee filed a Recipient Committee Statement of Termination indicating that its filing obligations were completed on _____, 200x. The Committee's treasurer was _____.

III. Audit Authority

The Commission is mandated by San Diego Municipal Code section 26.0414 to audit campaign statements and other relevant documents to determine whether campaign committees comply with applicable requirements and prohibitions imposed by State and local law.

IV. Audit Scope and Procedures

This audit was performed in accordance with generally accepted auditing standards. The audit involved a thorough review of the Committee's records for the time period covered by the audit. This review was conducted to determine:

1. Compliance with all disclosure requirements, pertaining to contributions, expenditures, accrued expenditures, and loans, including itemization when required;
2. Compliance with applicable filing deadlines;
3. Compliance with restrictions on contributions, loans and expenditures;
4. Accuracy of total reported receipts, disbursements and cash balances as compared to bank records; and
5. Compliance with all record-keeping requirements.

V. Summary of Applicable Law

(Complete this section only if a material violation exists. This is the section where the auditor would document the law applicable to the material finding(s).)

VI. Material Findings

Section _____: Failure to _____

(Summary of the material findings)

V. Conclusion

Through the examination of the Committee's records and campaign disclosure statements, the Auditor verified that the Committee accurately and timely disclosed all contributions received and all expenditures made and that the Committee maintained the necessary documentation regarding contributions and expenditures. **As a result, the Auditor determined that there were no material findings. The Committee substantially complied with the disclosure and record-keeping provisions of the Act and the San Diego Ethics Ordinance. Or - However, the Committee failed to _____ in violation of Section _____ of the act.**

Auditor's Name and Title

Date

Audit Supervisor's Name and Title

Date