San Francisco
Ethics Commission

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Records Required for Audit

When the Ethics Commission audits a campaign committee, Auditors begin the audit process by submitting an initial request for records. This page lists the categories of records that may be submitted to substantiate a committee's activity during the audit period, as well as guidelines for organizing those records for submission. All records listed here may not be relevant to a committee, but committees should submit all categories of records that they have in their possession. During the course of the audit, auditors may request additional records, including documentation associated with specific transactions.

Documentation should generally be well-organized, legible, and complete. State and local law requires candidates and committees to maintain detailed accounts, records, bills, and receipts as necessary to prepare campaign statements, and to retain detailed information and original source documentation for a period of four years. [1]

BANKING/FINANCIAL RECORDS

Provide records fully comprehensive of all activity of the committee's bank account(s) for the period covered by the audit.

- ☐ **Bank Statements** for the period covered by the audit.
- ☐ **Bank Statement Data** (in Excel or CSV format) for the period covered by the audit, if available to be downloaded directly from your bank.
- ☐ **Financial Ledgers or Check Register** maintained by the committee for the same period covered by bank statements. Documentation should demonstrate how the committee determined when it reached certain reporting requirements, such as candidate threshold statements or late contribution reports.
- ☐ **Petty Cash** records (if a petty cash fund was used) including a balance ledger, expenditure receipts, and bank withdrawal records to fund the petty cash fund.
- ☐ **Prepaid expense card (e.g. PEX) statements** for the period covered by the audit.

CONTRIBUTIONS RECEIVED (monetary, in-kind contributions, loans, other receipts)

For every contribution or other receipt your committee received, provide supporting documentation to demonstrate the amount, the identity of the payor, and the method of payment.

Organize documentation by reporting period, based on the date the contribution was received.

- ☐ **Contribution Reporting:** All contributions should be organized by deposit batches in order of date of deposit. Amounts shown on deposit batches should match amounts listed on the bank statements.

[1] See Title 2, California Code of Regulations, § 18401, and San Francisco Campaign & Governmental Conduct Code § 1.109. See also the Fair Political Practices Commission's Disclosure Manuals regarding recordkeeping.

- **Credit Card:** Receipt/transaction records from the credit card merchant demonstrating each transaction. **Transaction reports must be sent directly from your credit card processing vendor to the Ethics Commission**. Please copy your assigned auditor on an email request to your credit card vendor.
- **Wire Transfer:** Bank receipts showing wire originator information.
- **Check:** Copies of each check, proof of deposit, and signed and dated contributor card.
- **Cash:** Proof of deposit and signed and dated contributor card and.

☐ **Contribution Recordkeeping:** In addition to the information collected above, provide support for reported information including each contributor's full name, date and amount of contribution, street address, occupation, and employer, or, if a committee, the committee's assigned FPPC ID number. Records for each contribution may include:

- Contributor-reported information in **credit card vendor report**.
- **Contributor card**.
- **Contributor correspondence or attestations:** Remit forms/envelopes or correspondence related to contributor information (e.g. address, occupation/employer) or attribution/ aggregation.
- **Any other records** used to obtain contributor information required to be reported (e.g. website screenshots).
- **Any other support, as needed, to fulfill contribution recordkeeping requirements.**

☐ **Copies of Written Notices to All Contributors of $5,000 or More**

☐ **Non-Monetary Contributions:** Documentation demonstrating the source, nature, date of receipt, market value, and method of valuation of each contribution (e.g. receipts, invoices, correspondence).

☐ **Loans:** Lender agreements, records of payments, outstanding balances.

☐ **Miscellaneous Increases to Cash:** Original source documentation for all other receipts.

EXPENDITURES MADE (payments made, accrued expenses)

For every payment your committee made, provide supporting documentation to demonstrate the amount, the purpose, and the identity of the payee.

When a single payment is used for multiple expenditures, attach all expenditure documentation (e.g. invoices) to the payment record (e.g. check copy, wire payment receipt, etc.).

☐ **Expenditure Reporting:** Detailed payments including those made by agents/vendors to subvendors. Records of payments made to subvendors should be included with the invoice provided by the vendor or agent who retained the subvendor.

- **Check:** Copy of original signed check. Copies of canceled checks should be kept with the supporting documents.
- **Wire Transfer:** Copy of bank originator request.
- **Bank/Credit Card:** Payment receipt showing bank card number.

- **Cash:** Petty cash ledger, bank withdrawal receipts.
- **Payment software:** Screenshot of the payment via bill.com, PEX card payment, etc. and any attached original source documentation (e.g. screenshots, photographs of receipts).
- **Aggregated payment amounts:** If multiple payments are reported as aggregated amounts, provide documentation demonstrating the sources of the aggregated amounts.

☐ **Expenditure Recordkeeping:** In addition to the information collected above, provide support for reported information including <u>name of individual or business, date and amount of expenditure, street address, and description of goods or services received</u>.

- **Invoices, bills, or receipts**
- **Contracts or agreements**
- **Subvendor records:** When a payee utilizes a subvendor, provide documentation received from the payee making known all reportable subvendor information (name, date, amount paid to the subvendor, description of goods/services)
- **Payroll Records:** Names of workers, contract/payment agreements, timesheets, payments and date, time and description of services provided by workers.
- **Campaign Assets:** Documentation demonstrating the disposition of any campaign equipment or other assets (e.g. laptops, software) purchased with campaign funds, or documentation demonstrating who is currently in possession of such equipment or assets.
- **Fundraising Events:** Information regarding fundraising events including the event date and location, total amount collected, names of contributors and amounts received, costs associated with events, and invitations sent for events.
- **Additional recordkeeping for meals, gifts, or travel:** A dated memorandum, or other dated written record, including the names of all individuals for whom an expenditure for a meal or travel was paid, or the nature of a gift.
- **Any other support, as needed, to fulfill expenditure recordkeeping requirements**

☐ **Accrued expenses:** Maintain records of expenditures that were incurred in a reporting period but remained unpaid at the close of that period, including any applicable supporting documents listed above.

RECORDS TO BE REQUESTED AT A LATER DATE

The committee is not required to submit the records detailed below as part of this initial request for records. However, **the committee should ensure that these records are maintained and be prepared to provide them at a later date**. Commission auditors will request the below records in connection with the selected audit sample.

☐ **Bank Statements for Periods Following the Audit Period:** Auditors may request bank statements for additional periods as needed, e.g. for expenses incurred during the audit period but paid in a later period.

☐ **Campaign Communications:** Record of campaign communications paid for and disseminated by the committee, including costs, dates distributed, and copies or other facsimiles of the communications. Categories of communications include:

- **Printed Communications** (e.g. mailings, window signs, print ads): Legible copies of the final communication as produced.
- **Digital Ads** (e.g. web-based or social media ads): A digital copy or link to the ad.
- **Website and Social Media Pages:** Link to active/archived web pages or pdf copies of the primary landing page and all linked sub-pages (e.g. donation page, communications page, events page).
- **TV/Radio Ads & Web Videos:** Audio/video files of the entire ad as run.
- **Phone Banks, Robo Calls, Text Messages:** Full text of phone script or message distributed.
- **Recorded Telephone Messages:** Transcripts and recordings of telephone messages and a record of the date and number of calls made for each recorded message.

GUIDANCE FOR MISSING INFORMATION

If certain records or information requested in this document are unavailable, **please notify Commission auditors of such as part of your initial records submission.** This will allow for further guidance to be provided and prevent delays in the audit process.

- Provide a brief explanation for why the records are unavailable or contain incomplete information. You may use the “Additional Notes” field of the provided **Audit Questionnaire**, which should be submitted along with the records detailed in this document.
- Provide alternate documentation where possible. Missing records or incomplete information may be substituted with other documentation to substantiate the needed information. If alternate documentation is submitted, note why such records are being submitted in lieu of specific records requested above.