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**Office of the Inspector General
Miami-Dade County**

Memorandum

To: The Honorable Joe A. Martinez, Chairman, Board of County Commissioners
The Honorable Dennis C. Moss, Vice-Chairman, Board of County Commissioners
The Honorable Rebeca Sosa, Chairperson, Community Outreach, Safety and
Healthcare Administration Committee
And Members, Board of County Commissioners, Miami-Dade County

cc: See Distribution List

From: Christopher Mazzella
Inspector General

Date: February 23, 2005

Re: OIG Observations, Findings and Recommendations Relating to the Election Campaign
Financing Trust Fund

This memorandum, setting forth the OIG's observations regarding the above-captioned matter, is being provided to assist the Community Outreach, Safety and Healthcare Administration (COSHA) Committee's campaign finance workshop in its reviews and deliberations.

The Office of the Inspector General (OIG) became involved in matters relating to the Miami-Dade County Election Campaign Financing Trust Fund beginning this past July 2004 when the OIG was alerted to certain campaign contribution irregularities in a County Commission District Thirteen campaign. However, prior to initiating the investigation, the campaign of candidate Jorge Roque had been determined eligible by the Elections Department to receive public matching funding from the County's Campaign Trust Fund and had, in fact, already received the first disbursement of \$50,000 of public funds. Approximately twenty days later, the campaign received another \$25,000 disbursement, but the OIG, as noted below, was able to freeze the remaining \$18,000 of the balance of public funds distributed to the campaign.

Our investigation into these specific allegations of suspect campaign contributions necessitated not only an examination of the Roque campaign's contribution activity, but also a

comprehensive review of the Elections Department's qualifications and verification procedures for receipt of Trust Fund dollars. The campaign-specific examination included a forensic review of all the campaign contributions reported and submitted by the candidate's campaign as qualifying it to receive the publicly available funding. We extracted information from the form of the contribution (personal check, travelers check, money order, electronic funds transaction, etc.) and analyzed these instruments for patterns of suspicious activity. Investigative field work rounded out the investigation, which verified that fraudulent activity did occur and that its purpose was to fraudulently qualify the campaign to receive monies that it would not have been otherwise entitled to.

Ultimately, the OIG's investigation into these suspect contributions resulted in the arrests of two individuals related to the Roque campaign. And while one of the two individuals has already pled no contest to the criminal charges, the investigation of this particular campaign, as well as others, is continuing. Through the criminal charges and the association of the crimes to the receipt of the public monies, the prosecutors were able to successfully argue for a "freeze" on the Roque campaign's bank account. In order to freeze the account, the OIG, with the assistance of the State Attorney's Office (SAO), made application through the court for a warrant which could then be served on the bank to freeze the account. The freeze was accomplished only seven days after the second \$25,000 disbursement was made. Of the \$75,000 in public matching funds received, only \$18,000 remained in the account which could be frozen.

In the midst of this investigation, a decision was made by the OIG that all candidates qualifying for and receiving public campaign financing trust fund dollars should be equally examined as to the qualification materials submitted to the Elections Department and the verification procedures used by Elections. This decision was based on four factors: 1) the confirmed observations made in the two investigations of county commission candidates conducted by the OIG and the Miami-Dade Police Department¹ (MDPD) that the Elections Department's verification procedures lacked the necessary controls to detect fraudulent activity; 2) that all candidates seeking public monies should be subject to the same rigorous examination of their qualification submissions; 3) that post-election audits to be conducted by the Commission on Ethics could not be relied upon to adequately protect the County's interests in detecting irregularities or even criminal activities largely because the audit method relies upon sampling; and 4) that by its very nature of being a post-election audit, occurring not earlier than 90 days after the election, such a post-election audit of campaign contributions could not prevent the unwarranted distribution of Trust Fund monies.

The OIG subsequently examined the remaining eleven (11) candidate submissions qualifying them for Trust Fund monies. Each candidate's submission was examined under uniform guidelines consistent with the manner in which the Roque campaign's qualification was

¹ MDPD conducted an investigation of commission candidate Juan Miguel Alfonso. The investigation related to the "contributions" submitted by him to the Elections Department as qualifying for public funding. He was arrested on several election-fraud charges. No public monies had been disbursed.

examined. The examinations were conducted primarily by the OIG's audit staff with guidance and assistance from our investigative and analytical personnel. Where the forensic examinations revealed irregularities, OIG's investigators followed up with investigative field work and interviews as needed to verify, confirm and/or clarify the apparent irregularities. The results of our examinations were shared with MDPD and the SAO, as we have been working closely with these agencies on several other investigations. Without revealing any specifics or particulars about any one investigation, the OIG and the MDPD have compiled a general set of observations that were readily apparent from our campaign examinations. The list exemplifies what we have identified as loopholes, deficiencies, inefficiencies, problems and otherwise notable concerns with the current procedures in place (as administered in the 2004 elections) for the qualification of public Campaign Financing Trust Fund monies and the verification of that information. It should be clarified that these findings relate only to the front-end process of qualifying for and receiving Trust Fund monies, though it also must be stressed that we (OIG and MDPD) are also investigating aspects with respect to campaign expenditures. What is required by the Code of post-election audits of expenditures is not addressed herein.

Finally, it should be emphasized that the OIG does not take any policy position on the merits of public financing of campaigns. Whether the current ordinance establishing some form of public financing for county candidate campaigns is reformed or repealed is not a matter for the OIG. What is important is that should the Board of County Commissioners decide to keep the Campaign Financing Trust Fund in its current or some alternate form, that certain processes be made more effective in detecting fraud and other irregularities, that only those who truly meet eligibility requirements are qualified to receive public funding, that loopholes are closed, that verification procedures are made uniform, that the verification process be efficient, timely and cost effective, and that public campaign funds are only used for legitimate expenditures.

* * * * *

FINDINGS AND OBSERVATIONS

1. Other than Section 12-22 of the Code of Miami-Dade County, there were no other written procedures, guidelines or other instructive material to guide the Elections Department in its processing of candidate qualifying submissions and/or to guide candidates through the eligibility process requirements.

As an overall observation, it is noted that the absence of written procedures establishing clear requirements of the candidates and providing precise instructions to Elections Department staff in the review function impacted the Department's process of adequately verifying that all eligibility thresholds were met to thereby qualify the candidate to receive matching public funding.

One of the first problems that the OIG discovered was that the Elections Department did not have any written procedures regarding the matching funds program. When asked how the Elections personnel knew how to determine if a candidate's contributions are valid and eligible to be considered for matching funds, the OIG was advised that the Elections personnel are trained on an individual basis with verbal instructions. It is also important to note that since the majority of the Elections personnel who reviewed the matching funds documents to determine eligibility were seasonal employees, the need for standardized written procedures was even more apparent.

Furthermore, the ordinance is silent as to any process for replacing "rejected" contributions, and apparently the Elections Department allowed candidates or their campaigns to address Elections personnel about their rejected contributions and, if need be, to "correct" any deficiency. What was not clear was whether a rejected contribution could be replaced with an altogether new supplemental contribution or whether this impromptu process was limited to curing a deficiency (e.g. incomplete identifying information/voter registration information). What is also not clear is whether the curing or clarification of a rejected contribution could be accepted after the initial submission deadline.

2. **Current processes, including the format of contribution submission paperwork, negatively impacts the ability of the Elections Department to adequately perform a verification review to determine that all required eligibility thresholds are met. The current process does not adequately detect duplicate submissions and other irregularities that may be indicative of fraudulent activity.**

Candidates for County Commission seats must meet three thresholds in order to be eligible for matching funds. The candidate must obtain 1) at least 200 separate contributions, between \$15 and \$250; 2) from at least 200 different registered voters residing in Miami-Dade County; and 3) totaling at least \$15,000 (to obtain \$50,000 in matching funds) or totaling at least \$25,000 (to obtain \$75,000 in matching funds).

Candidates for the Mayoral race must meet only two thresholds in order to be eligible for matching funds. The candidate must obtain 1) at least 1,000 separate contributions, between \$15 and \$250; and 2) from at least 1,000 different registered voters residing in Miami-Dade County (to obtain \$300,000 in matching funds).

In all twelve cases we found that the Elections Department did not verify that the candidate met the eligibility threshold for the required number of different registered voters, but simply counted each separate contribution as though each contribution was from a different registered voter. So, in actuality, if a registered voter made more than one contribution, the additional contribution(s) from that voter should not be counted towards the number of different registered voters threshold. For example, if a person gives two contributions to a candidate,

one for \$50.00 and one for \$75.00, then Elections should count them as two contributions for a total value of \$125.00, but only from one contributor.

During the OIG's examination, we found that there was no reconciliation of all the information contained in the contribution forms submitted by the candidates. As contributions were listed on multiple pages submitted by the candidate, and are often reviewed by different Elections personnel, the same individual contributor was counted twice when making two separate contributions. In other instances, we found that the same contribution from the same individual was submitted on separate pages. Again, because the submitted paperwork was not reviewed in its entirety by the same person, Elections personnel did not realize that, for instance, the photocopy of the check was a duplicate submission and thus counted the contribution twice towards the eligibility thresholds.

Furthermore, the forms on which the candidates are required to submit the contribution information does not include a field for the check/money order/traveler's check/credit card or electronic funds transaction number. The OIG was able to extract these numbers from the attached photocopy of the check/money order/traveler's check/credit card or electronic funds transaction, and enter it on a spreadsheet that we created in order to sort and analyze the contributions.

In several cases we reviewed contributions made by money orders. In these cases, we found several batches where the money orders submitted were sequentially numbered, purchased at the same location, yet the addresses of the contributors were spread out around the County. A further investigation found that these money orders were fraudulent contributions made by one person and not by the supposed contributors listed in the documents.

3. **There was no clear requirement regarding the maximum volume of contribution information to be submitted and reviewed in order to determine eligibility, thereby creating non-uniform standards of review.**

In the OIG's review of the matching fund contribution information, we found that the Elections Department did not have any standards setting the maximum volume of contribution information that should be submitted by the candidate and reviewed by Elections. For example, candidates for the mayoral race had to have at least 1,000 contributions from at least 1,000 different registered voters. One candidate submitted information on over 2,300 contributions while another candidate only submitted 1,050 contributions. In the first example, Elections staff reviewed approximately 1,500 of the 2,300 contributions submitted. In the second example, of the 1,050 contributions submitted, all the contributions were reviewed, but only 1,006 of those contributions were deemed acceptable for eligibility towards the matching fund thresholds. This put the candidate perilously close to not qualifying. More problems could arise should a subsequent audit find that some of the contributions were, in fact, not acceptable. Furthermore, the extra work placed upon Elections personnel to review an

excessive number of contributions detracts from other work to be done (e.g., reviewing other candidate submissions) by Elections staff during a very busy period of elections-related activity.

4. **Otherwise unacceptable check contributions for matching fund purposes were accepted by the Elections Department.**

The Code provisions governing the Campaign Financing Trust Fund require that contributions in the form of a regular bank check must be a “personal check.” The lack of training and written procedures for reviewing personnel, as previously noted, most likely contributed to the acceptance of what should have been determined to be invalid check contributions.

As reference, Florida Statutes, Section 106.35 (campaign financing for Governor, Lt. Governor and state Cabinet Offices) states:

A contribution from an individual, if made by check, must be drawn on the personal bank account of the individual making the contribution, as opposed to any form of business account, regardless of whether the business account is for a corporation, partnership, sole proprietorship, trust, or other form of business arrangement. For contributions made by check from a personal joint account, the match shall only be for the individual who actually signs the check.

While the reference above is not specific to qualifying contribution for public financing purposes, it does more precisely give guidance as to what a “personal check” is and how to denote the individual contributor when the check is drawn from a personal joint account.

A. **Inappropriate checking accounts.**

During our examination, we found several instances where Elections personnel had deemed contributions as acceptable that were drawn from business accounts, corporate accounts and trust accounts. The term “personal check” denotes individual contribution and intuitively should have barred the acceptance of business and corporate checks for matching funds contribution purposes. We also noted contributions from trust accounts that were perhaps mistaken as personal checks, e.g. Trust of John Doe. These, too, should have been determined ineligible for matching public funding purposes.

B. **Incorrect attribution of contributor when from joint accounts.**

Contributions from personal joint accounts were not always attributed to the individual who actually signed the check. The OIG found instances where there were two contributions from the same joint checking account and both were signed by the same individual. In several of these instances, Elections personnel counted both contributions and attributed one contribution to each to the two individuals listed on the joint personal account. For example, two checks from the joint account of "John and Jane Doe" are submitted to the Elections Department as two separate individual contributions. The pre-printed name of John Doe is circled at the top of first check and the name of Jane is circled at the top of the second check. Both checks, however, are signed by John Doe. In this example, only the one contribution from John Doe should have been approved as a single qualifying contribution. The contribution intending to have been submitted by Jane Doe should have been rejected as she did not sign the check.

5. **The lack of a signature requirement on contributions made by money order and electronic funds transfer (EFT) undermines contributor/voter registration verification.**

One of the primary methods that Elections personnel use to determine the validity and eligibility of a contribution for matching funds is to verify the signature of the contributor on the payment document (such as the check) with the signature of the registered voter on file with Elections. However, other contribution methods such as money orders, credit card transactions, and electronic fund transfers do not require that the contributor provide a signature. Therefore, Elections cannot properly determine the validity and eligibility of those contributions.

6. **Current procedures lack accountability measures requiring a basic attestation to the truthfulness of the information.**

For standard campaign reporting, both the candidate and the campaign treasurer are required to sign the regular campaign reporting forms (which report all campaign contributions and expenditures), asserting that the information is true and correct. However, for the application for public finance trust fund monies, there is no similar requirement that the candidate, campaign treasurer or anyone on behalf of the campaign sign the matching fund contribution forms and assert that that information is true and correct. This lack of a requirement is a serious flaw of the current procedures. It undermines any efforts to hold the candidate and the campaign accountable to the public and makes it difficult to investigate individuals for their participation in any scheme to defraud the trust fund.

7. **The current Elections Department internal process has no built in accountability controls to ensure that verification procedures are uniform and that review is consistent.**

In reviewing the matching fund program files, there were occasions where the OIG had questions regarding the specific decision made about a certain contribution, such as why a contribution was allowed or disallowed. However, there was no way to tell which of the Elections personnel had reviewed any particular matching fund contribution form since there is no place on the form for the reviewer to sign. In addition, there was no way to tell if an Elections supervisor had reviewed the results of the Elections eligibility review and agreed with the results.

* * * * *

SHOULD THE BOARD OF COUNTY COMMISSIONERS DECIDE THAT SOME PROGRAM OF PUBLIC CAMPAIGN FINANCING IS TO BE RETAINED, THE OIG MAKES THE FOLLOWING GENERAL RECOMMENDATIONS RELATIVE TO OUR FINDINGS.

1. Any operational procedures and/or supplemental instructions to the candidates should be clearly established in writing and well prior to the qualification period and eligibility reviews. It should be clear as to whether “rejected” contributions may be clarified, cured or substituted by another individual contribution. It should also be stated up front whether additional time is allotted to the candidate to clarify/cure certain contributions.
2. Uniform reporting and/or performance criteria should be established that lays out the criteria to use when verifying the contribution submissions and how to document and report the results of the verification process. Specific steps (i.e., a “checklist”) should be implemented in order to prevent the counting of duplicate contributions and the acceptance of other ineligible contribution types. All personnel involved in this review must be knowledgeable of the procedures and consistent in its application.
3. More precise definitions of allowable contributions, i.e., a “personal check,” should be authoritatively established either in the Code or by Administrative Order. A definitive statement regarding checks from business, corporate and trust accounts should be included. There should also be a statement regarding eligible contributions drawn from joint checking accounts.

4. Establish a contributor signature requirement for contributions made via money order and credit card/EFT.
5. Establish a process of supervisory review. In the event of exceptions, a procedure of how to document them and how exceptions should be reported to supervisory personnel should be included. The identity of the reviewer, the supervisor, and ultimately the certifier of said results should also be recorded.
6. Establish an electronic reporting format that combines onto one form all information necessary for candidates to meet both the requirements of their periodic campaign financing report submissions and their applications for matching funds from the Campaign Finance Trust Fund. The electronic format should also be expanded to include fields to capture contribution information such as the transaction numbers from the check/money order/traveler's check/credit card or EFT transaction.
7. In addition to requiring that the reporting format be electronic, it should also be required that the candidate submit all documentation supporting the eligible contributions, and thereby meeting the qualification requirement. All supporting documentation should be submitted together in order to avoid the piecemeal reviews, as noted in our findings.
8. There should be a cap placed on the maximum number of contributions submitted by the candidate for determinations of eligibility. The cap may be a percentage amount, for example, no more than 20% above the required number (240 for commission seats, 1200 for the mayoral race). With a maximum number established, all submitted contribution information should, therefore, be reviewed and counted.
9. There absolutely should be a signature requirement that identifies person responsible for submitting the contribution paperwork and attesting to its truthfulness.
10. Prior to the disbursement of any funds, an independent review should be conducted by the appropriate agency to be determined by the Board.
11. The Code section should contain a cause of action that would allow the County to freeze funds and recoup monies in the event that funds are disbursed and violations are found.

cc: Robert A. Ginsburg, County Attorney
George M. Burgess, County Manager
Alina Hudak, Assistant County Manager
Constance Kaplan, Director, Elections Department
Charles Anderson, Commission Auditor
Cathy Jackson, Director, Audit and Management Services Department
Robert Meyers, Executive Director, Commission on Ethics

Clerk of the Board (copy filed)

OIG FINDINGS

1. Lack of written procedures and guidelines.
2. Process does not detect duplicate submissions or other irregularities.
3. No uniform standard of review for the maximum number of contributions to be reviewed by
4. Unacceptable check contributions.
 - A. Business and Trust account checks.
 - B. Joint checking accounts not being attributed to the individual that signed the check
5. Lack of signature on contributions by money order and check card/electronic funds transfer undermines contributor voter verification.
6. Lack of accountability measures to assert that the information is true and correct.
7. Process does not ensure that verification procedures are uniform and that the review is co



SAMPLE CONTRIBUTIONS LIST FOR APPLICATION FOR ELECTRONIC CAMPAIGN FINANCING TR



2/02

MIAMI-DADE ELECT

02/13/05 09:47 0360 486 8347

Name of Candidate (First Name, Middle Initial, Last Name)		Office <input type="checkbox"/> Miami-Dade County Mayor <input type="checkbox"/> Miami-Dade County Commissioner District # _____		Indicate Page Number Page # _____ of _____ <small>(PLEASE TYPE OR USE BLACK INK)</small>				
#	Date	First Name/Last Name of Contributor	Miami-Dade County Address	At least one of the following must be entered for Voter Registration verification		Amount of Contribution	Type	Other Info
				Date of Birth	Voter Registration #			
1								
2								
3								
4								
5								
6								
7								
8								
9								
10								

DISCLAIMER NOTE: All contributions must also be reported on the prescribed Campaign Treasurer's Report forms from the State of Florida, Division of Elections in accordance with established regulations.
City Document/Procurement/Contract/Invoice for form doc 027004 1/07/04

CONTRIBUTION LIST FOR APPLICATION FOR ELECTION CAMPAIGN FINANCING TRUST FUND

RECEIVED

MIAMI-DADE COUNTY
CONTRIBUTIONS LIST FOR APPLICATION FOR
ELECTION CAMPAIGN FINANCING TRUST FUND -6 PM 5:03

Indicate Page Number
Page # 3 of
(PLEASE TYPE OR USE BLACK INK)

ELECTIONS **MIAMI DADE COUNTY ELECTIONS DEPARTMENT**

Name of Candidate:

Office: Miami-Dade County Mayor Miami-Dade County Commissioner District # 13

#	Date	Miami-Dade County Address	Place and date of the following must be entered for every contribution		Amount of Contribution	Type	Other Use
			State of Birth	Year Registered			
1	3/1/04	1355 SW 47th St Miami FL		3/1/04	15.00	ck	MISSED Check
2	3/1/04	1401 Lane Lane Ct Miami Lakes FL 33054			20.00	ck	A
3	3/2/04	Miami FL 33146 10521 SW 187 St		1/25/73	25.00	ck	A
4	3/2/04	Miami FL 33146 1190 SW 255 St		3/24/53	250.00	ck	A
5	3/2/04	Miami FL 33175 15300 159 St		7/10/38	25.00	ck	A
6	3/2/04	Miami FL 33016 1852 NW 182 St		10/22/60	15.00	ck	A
7	3/2/04	Miami FL 33016 5234 SW 140 St		8/27/60	15.00	ck	A
8	3/2/04	Miami FL 33146		8/20/74	250.00	ck	A
9	3/2/04	7502 W 29th St Miami FL 33018		1/15/41	40.00		A
10	3/2/04	142 W 29th St Miami FL 33018		12/14/43	15.00		A

IMPORTANT NOTE: All contributions must be reported to the State of Florida Division of Elections by March 15th of the year following the election.



SAMPLE CONTRIBUTIONS LIST FOR APPLICATION FOR ELECTION CAMPAIGN FINANCING TRUST

RECEIVED
JUN JUL -6 PM 5:11
Page # 18 of
PLEASE TYPE OR USE BLACK INK

MIAMI-DADE COUNTY ELECTIONS DEPARTMENT
 Miami-Dade County Mayor
 Miami-Dade County Commissioner District # 13

#	Date of Contribution	Name of Contributor	City of DDA		Amount of Contribution	Type	Other Use
			Year	Registration #			
1	6/21/04	Miami FL 25186		00178374	15.00	ck	A
2	7/2/04	Miami FL 25186			250.00	ck	A
3	7/1/04	Miami FL 25186	7/6/03	20044683	250.00	ck	A
4	7/6/04	Miami FL 25186	10/7/00		250.00	ck	A
5	7/6/04	Miami FL 25186	6/10/00		250.00	ck	A
6	7/6/04	Miami FL 25186	10/7/00		250.00	ck	A
7	7/6/04	Miami FL 25186	3/26/00		250.00	ck	A
8	6/1/04	Miami FL 25186	3/26/00		20.00	ck	A
9	6/29/04	Miami FL 25186	3/26/00		20.00	ck	A
10							

IMPORTANT NOTICE:
City Commission/County Board

1555



SAMPLE OF ONE (1) VOTERS SINGLE CONTRIBUTION BEING COUNTED TWICE
COMMISSIONER CANDIDATE

No.	Date	Contributor Address	City	State	DOB	Voter's Registration #	VOTER INFO.	Contribution Amt.	Check/MO	No. Check/MO	M
1A	3/11/2004	14011 LAKE LURE COURT	MIAMI	FL		#01498412	A	\$20.00	C	1223	
2A	3/11/2004	14011 LAKELURR CT	MIAMI LAKES	FL		#01498412	A	\$20.00	C	1223	
1B	3/31/2004	3470 SW72 COURT	MIAMI	FL	2/22/60		A	\$250.00	C	128	
2B	3/31/2004	3470 SW72 COURT	MIAMI	FL	2/22/60		A	\$250.00	C	128	



SAMPLE OF ONE (1) VOTERS SINGLE CONTRIBUTION BEING COUNTED TWICE

MAYORAL CANDIDATE

NO.	Stamped Date	Date	MI	Contributor Address	City	State	DOB	Voter's Registration #	VOTER INFO.	Contribution Amt.	Check/MO	No. Check/MO
1A	6/29/04	6/21/04	M	780 NW LeJune Rd # 423	not stated	FL	not stated	00179992	A	\$15.00	CHK	1943
1B	6/25/04	not noted	M	780 NW LeJune Rd # 423	miami	FL	not stated	00179992	A	\$15.00	CHK	1943
2A	6/25/04	not noted		780 NW LeJune Rd # 423	Miami	FL	not stated	000486329	A	\$15.00	CHK	1944
2B	6/29/04	6/21/04	G	780 NW LeJune Rd # 423	not stated	FL	not stated	000486329	A	\$15.00	CHK	1944
3A	6/22/04	6/6/04	Diaz	9800 Sunset Dr	not stated	FL	not stated	01877825	A	\$150.00	CHK	2640
3B	6/22/04	6/6/04	D	9800 Sunset Dr	not stated	FL	not stated	01877825	A	\$150.00	CHK	2640
4A	6/22/04	6/18/04		7825 Camino Real #J205	not stated	FL	5/14/1977	not stated	A	\$15.00	CHK	1631
4A	6/22/04	6/18/04		7825 Camino Real #J205	not stated	FL	5/14/1977	0450420771740	A	\$15.00	CHK	1631
5A	6/29/04	6/23/04		680 W 50 Pl	Hialeah	FL	3/14/1931	not stated	A	\$15.00	CHK	2600
5B	6/25/04	6/24/04		680 W 50 Pl	not stated	FL	3/14/1931	not stated	A	\$15.00	CHK	2600



INITIAL ANALYSIS OF CAMPAIGN CONTRIBUTIONS BY MONEY ORDER ONLY

Stamp Date	Date	Contributor Address	City	State	Voter's Registration #	VOTER INFO.	Contribution Amt.	Check/MO	No. Check/MO
6/29/2004	3/30/04	17745 NW22nd Ave	Miami Gardens	Florida		No Match Found	\$15.00	MO	#0664251717
6/29/2004	3/30/04	17745 NW22nd Ave	Miami Gardens	Florida		No Match Found	\$15.00	MO	#0664251718
6/29/2004	3/30/04	1888 NW58th St	Miami	Florida		A	\$15.00	MO	#0664251719
6/29/2004	3/30/04	15815 NW19th Ave	Opa Locka	Florida		A	\$15.00	MO	#0664251720
6/29/2004	3/30/04	3280 NW209th Terr.	Miami Gardens	Florida		No Match Found	\$15.00	MO	#0664251721
6/29/2004	3/30/04	1888 NW58th St	Miami	Florida		A	\$15.00	MO	#0664251722
6/29/2004	3/30/04	900 NW196 Terr.	Miami	Florida		No Match Found	\$15.00	MO	#0664251723
6/29/2004	3/30/04	1250 NE 125 St# 209	Miami	Florida		No Match Found	\$15.00	MO	#0664251724
6/29/2004	3/30/04	15801 NW18th Pl	Opa Locka	Florida		A	\$15.00	MO	#0664251725
6/29/2004	3/30/04	15701 NW17th Ct	Miami	Florida		Status F	\$15.00	MO	#0664251726



ANALYSIS OF CAMPAIGN CONTRIBUTIONS BY MONEY ORDER ONLY REVEALING SEQUENTIAL N

Stamp Date	Date	Contributor Address	City	State	Voter's Registration #	VOTER INFO.	Contribution Amt.	Check/MO	No. Check/M
6/29/2004	3/30/04	17745 NW22nd Ave	Miami Gardens	Florida		No Match Found	\$15.00	MO	#0664251717
6/29/2004	3/30/04	17745 NW22nd Ave	Miami Gardens	Florida		No Match Found	\$15.00	MO	#0664251718
6/29/2004	3/30/04	1888 NW58th St	Miami	Florida		A	\$15.00	MO	#0664251719
6/29/2004	3/30/04	15815 NW19th Ave	Opa Locka	Florida		A	\$15.00	MO	#0664251720
6/29/2004	3/30/04	3280 NW209th Terr.	Miami Gardens	Florida		No Match Found	\$15.00	MO	#0664251721
6/29/2004	3/30/04	1888 NW58th St	Miami	Florida		A	\$15.00	MO	#0664251722
6/29/2004	3/30/04	900 NW196 Terr.	Miami	Florida		No Match Found	\$15.00	MO	#0664251723
6/29/2004	3/30/04	1250 NE 125 St# 209	Miami	Florida		No Match Found	\$15.00	MO	#0664251724
6/29/2004	3/30/04	15801 NW18th Pl	Opa Locka	Florida		A	\$15.00	MO	#0664251725
6/29/2004	3/30/04	15701 NW17th Ct	Miami	Florida		Status F	\$15.00	MO	#0664251726



ALL MONEY ORDERS WERE PURCHASED AT SAME LOCATION AT SAME TIME, BY SAME PERSON, USING PERSONAL DEBIT CARD

SAMPLE OF ELECTIONS DEPT. CONTRIBUTIONS CALCULA

08/06/04 10:44 ~305 ~002/002

"

...

Date	Turned~in Contributions	Contributions Allowed	Dollar amount
71612004	189	164	\$12,670.00
71812004	24	23	\$3,550.00
71912004	11	11	\$2,550.00
7112/2004	18	16	\$3,210.00
711312004	14	13	\$3,330.00
	256	227	\$25.310_00

Revised by Zeida Reyes ~ 816104



CAMPAIGN TREASURER'S REPORT SUMMARY

FLORIDA DEPARTMENT OF STATE, DIVISION OF ELECTIONS CAMPAIGN TREASURER'S REPORT SUMMARY	
(I) <u> </u> Name, Street, City, State, ZIP Code	(II) <u> </u> FID Number
(III) <u> </u> Title, Party, District, etc. (SEE INSTRUCTIONS)	
Address, Building and Street City State ZIP Code	
<input type="checkbox"/> Check box if address has changed since last report	
(IV) Check applicable category:	
<input checked="" type="checkbox"/> Candidate (office sought) _____ District, Commission, etc.	<input type="checkbox"/> Check if PFC has DISBURSED
<input type="checkbox"/> Political Committee	<input type="checkbox"/> Check if ECI has DISBURSED
<input type="checkbox"/> Committee of Contributors	
<input type="checkbox"/> Party Executive Committee	
(V) Report Month/Year _____ Report Type _____	
Cover Period: <u> </u> to <u> </u> Report Type: <u> </u>	
<input type="checkbox"/> Regular <input checked="" type="checkbox"/> Amendment <input type="checkbox"/> Special Election Report <input type="checkbox"/> Independent Expenditure Report	
(VI) CONTRIBUTIONS THIS REPORT	(VII) EXPENDITURES THIS REPORT
Cash & Checks \$ <u> </u>	Monetary Expenditures \$ <u> </u>
Loans \$ <u> </u>	Transfer to Other Account \$ <u> </u>
Total Monetary \$ <u> </u>	Total Expenditures \$ <u> </u>
in Kind \$ <u> </u>	(VIII) Other Contributions \$ <u> </u>
(IX) TOTAL Monetary Contributions to Date \$ <u> </u>	(X) TOTAL Monetary Expenditures to Date \$ <u> </u>
(XI) CERTIFICATIONS	
I certify that I have examined this report and it is true, correct and complete.	I certify that I have examined this report and it is true, correct and complete.
Name of <input checked="" type="checkbox"/> Treasurer <input type="checkbox"/> Proxy Treasurer	Name of <input checked="" type="checkbox"/> Candidate <input type="checkbox"/> Committee (PFC/PC)
<u> </u>	<u> </u>

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OIG RECOMMENDATIONS

- 1 Operational procedures and instructions should be clearly established in writing.
- 2 Uniform reporting criteria should be established when verifying the contribution process and how to do report results verification.
- 3 Precise definitions of allowable contributions.
- 4 Establish a signature requirement for contributions made via money order or credit card/electronic funds transfer.
- 5 Establish a process of supervisory review.
- 6 Establish electronic reporting format that combines all information for campaign contribution reporting applications for public financing trust funds.
- 7 All supporting documents for eligible contributions should be submitted together– not piecemeal.
- 8 A cap should be placed on maximum number of contributions submitted by candidate.
- 9 Require a signature that identifies responsible person submitting contribution paperwork.
- 10 Conduct independent review prior to disbursement of funds.
- 11 Establish a legal mechanism to freeze and recoup funds.

