



**TENNESSEE BUREAU OF ETHICS AND CAMPAIGN FINANCE
REGISTRY OF ELECTION FINANCE**

**Campaign Finance Audit of
Richard Dawson
Election Year 2018**



STATE OF TENNESSEE



BUREAU OF ETHICS AND CAMPAIGN FINANCE REGISTRY OF ELECTION FINANCE

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September 11, 2018

Members of the Registry of Election Finance
404 James Robertson Parkway, Suite 104
Nashville, TN 37243-1360

Registry Members,

Transmitted herewith are the agreed upon procedures for the campaign finance audit of Richard Dawson's 2018 election campaign for House of Representatives District 33. This audit was conducted pursuant to the requirements of T.C.A. §2-10-212.

The procedures were developed to aid the Registry of Election Finance in its responsibilities to monitor and enforce Tennessee's Campaign Financial Disclosure Law and Campaign Contribution Limits Law. The candidate is responsible for complying with campaign finance laws and the accuracy of campaign financial disclosures. The sufficiency of these procedures is solely the responsibility of the Bureau of Ethics and Campaign Finance's audit group. Consequently, we make no representation regarding the sufficiency of the agreed upon procedures described in the report for any other purpose than aiding the Registry.

This report is intended for the information and use of the Members of the Tennessee Registry of Election Finance as outlined and is not intended to be and should not be used by anyone other than the Registry without understanding the objectives, purposes, and underlying assumptions. This report, however, is a matter of public record.

Sincerely,

Jay Moeck, CPA, CFE
Audit Director

STATE OF TENNESSEE
BUREAU OF ETHICS AND CAMPAIGN FINANCE
REGISTRY OF ELECTION FINANCE

Audit Highlights

Richard Dawson
2018 Campaign Finance Audit

AUDIT OBJECTIVES

The objectives of the audit were to determine Richard Dawson's compliance with certain provisions of campaign finance disclosure laws and regulations; compliance with certain provisions of campaign contribution limit laws and regulations; accuracy and completeness of the disclosures on the 2018 First Quarter, 2018 Second Quarter, 2018 Pre-Primary, 2018 Third Quarter, 2018 Pre-General and 2018 Fourth Quarter Campaign Financial Disclosure Statements; and to recommend appropriate actions to correct any deficiencies.

FINDING(S)

- 1. Richard Dawson violated T.C.A. §2-10-105(a) by failing to report \$1,057.95 in campaign contributions, the failure to report was the result of violating T.C.A. §2-10-107 by improperly reporting contributions and the related expenses from online services used to collect contributions.**
- 2. Richard Dawson violated T.C.A. § 2-10-105(f) by failing to maintain contributor data for \$260 in cash contributions.**
- 3. Richard Dawson violated T.C.A. §2-10-212(c) failing to maintain sufficient campaign records to support activities associated with disbursements.**

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INTRODUCTION

AUDIT AUTHORITY

Tennessee Code Annotated (T.C.A.) §§ 2-10-207, 2-10-212 authorize the Registry of Election Finance (the “Registry”) to conduct audits of campaign financial disclosure statements filed with the Registry. The audit was initiated based on T.C.A. § 2-10-212(2), which requires the Registry to audit approximately two percent of all candidates for the general assembly.

AUDIT PURPOSE

The Registry’s campaign finance audits were developed to assist and encourage candidate compliance with campaign disclosure laws. The audit process assists the Registry in providing timely and accurate campaign information to government officials and the general public. The Registry’s audits provide a tool to the Registry to evaluate the effectiveness of the campaign financial disclosure process. In addition, the audits assist the Registry with the enforcement of campaign finance limit laws and campaign finance disclosure laws. Finally, the audit reports are intended to assist the candidate and the State of Tennessee with promoting governmental accountability and integrity.

AUDIT SCOPE

During non-election years, Tennessee’s campaign financial disclosure law requires candidates to make biannual financial disclosures as of the date of the first contribution or first expenditure, whichever occurs earlier. The biannual reporting periods are from January 16 to June 30 and July 1 to January 15 of each year. During election years, the disclosures expand to quarterly, pre-primary, and pre-general reports. Therefore, the audit reviewed Richard Dawson’s disclosures on his 2018 First Quarter, 2018 Second Quarter, 2018 Pre-Primary, 2018 Third Quarter, 2018 Pre-General, and 2018 Fourth Quarter Campaign Financial Disclosure Statements.

CAMPAIGN OVERVIEW

CAMPAIGN ORGANIZATION

Richard Dawson was a candidate in the November 6, 2018 general election for House of Representatives District 33. Mr. Dawson filed an Appointment of Political Treasurer Statement with the Registry on January 18, 2018 appointing Jan L. Newsome as political treasurer.

The candidate's first financial disclosure for the 2018 campaign was the 2018 First Quarter report filed on April 4, 2018. As of June 30, 2019, Mr. Dawson's most recent financial disclosure was the 2018 Fourth Quarter Report, which he filed on January 25, 2019. The Fourth Quarter report indicated \$5,987.09 cash on hand, no outstanding obligations, and \$62,000 in outstanding loans. The candidate has not completed his 2018 election filings.

OVERVIEW OF FINANCIAL ACTIVITIES

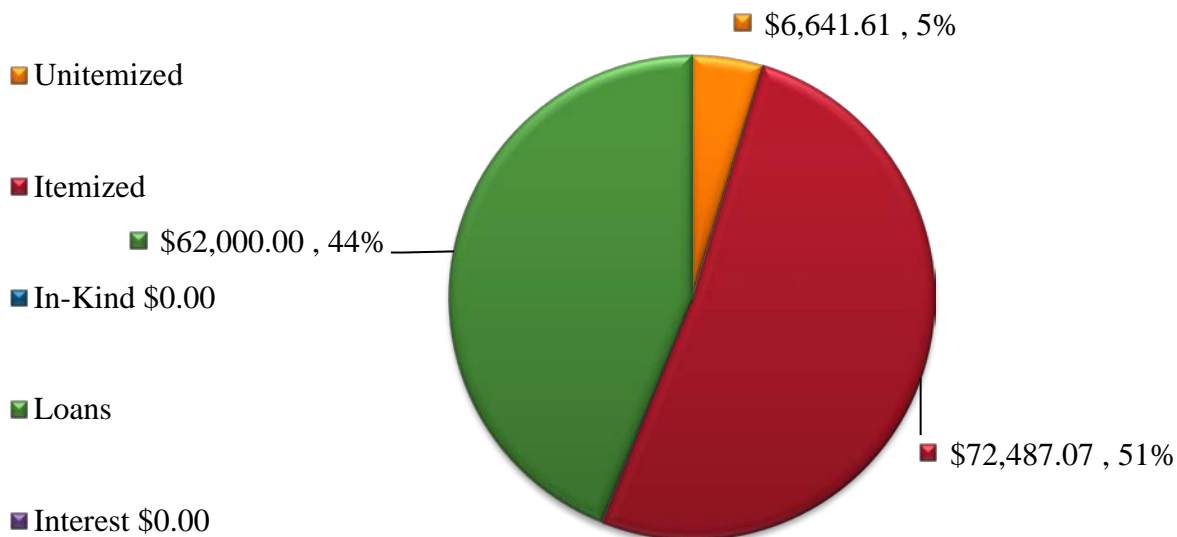
The following financial amounts are a summary of the financial disclosures made by the candidate. The summarized amounts are from the following disclosure reports: 2018 First Quarter, 2018 Second Quarter, 2018 Pre-Primary, 2018 Third Quarter, 2018 Pre-General, and 2018 Fourth Quarter reports after amendments. The amounts displayed are for informational purposes only.

<u>Summary of Financial Activity</u>		
<u>(Un-audited Amounts)</u>		
Cash on hand at January 16, 2018		\$0.00
Receipts		
Unitemized	\$6,641.61	
Itemized	72,487.07	
Loans received	62,000.00	
Interest	0.00	
Total receipts		<u>\$141,128.68</u>
Disbursements		
Unitemized	309.22	
Itemized	134,832.37	
Loans principal payments	0.00	
Obligation payments	0.00	
Total disbursements		<u>\$135,141.59</u>
Cash on hand at January 15, 2019		<u>\$5,987.09</u>
Loans outstanding at January 15, 2019		\$62,000.00
Obligations at January 15, 2019		\$0.00
Total in-kind contributions received		\$0.00

CHARTS

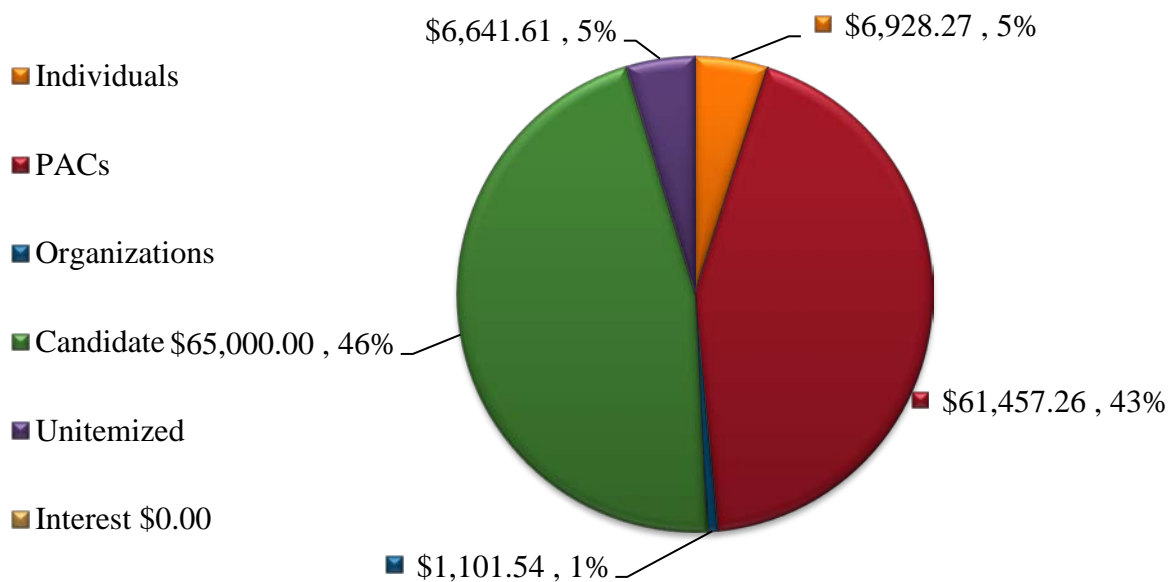
2018 ELECTION CAMPAIGN CONTRIBUTIONS

The following chart shows the contributions reported by the candidate for the 2018 election campaign.



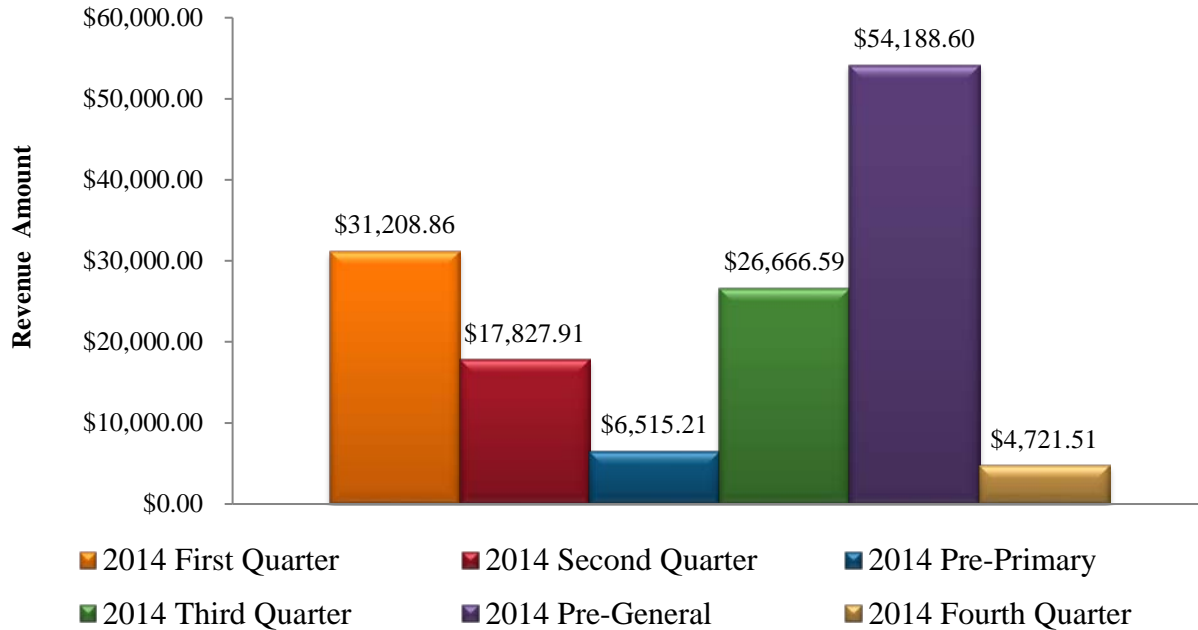
2018 ELECTION CONTRIBUTIONS BY SOURCE

The following chart shows the monetary contributions reported by the candidate for the 2018 election campaign. Organizations in this chart represent non-profit organizations, non-PAC campaign organizations, or businesses.



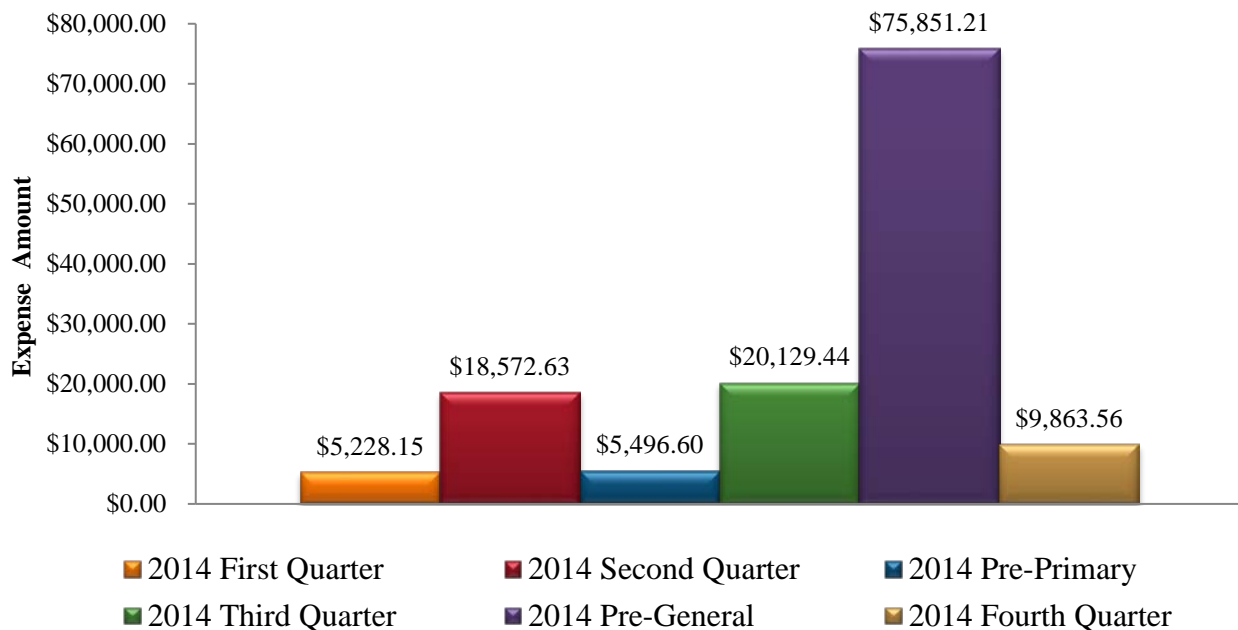
2018 ELECTION CONTRIBUTIONS BY REPORTING PERIOD

The following chart shows the contributions that the candidate reported for the 2018 election campaign by reporting period.



2018 ELECTION EXPENSES BY REPORTING PERIOD

The following chart shows the expenses that the candidate reported for the 2018 election campaign by reporting period.



OBJECTIVES, METHODOLOGIES, CONCLUSIONS

CONTRIBUTIONS AND RECEIPTS

Audit Objectives:

The objectives of our audit of contributions and loans were to determine whether:

- all campaign contributions from individuals and Political Action Committees (PACs) were within campaign limits;
- all contributions were from non-prohibited sources;
- all contributions received were reported, reported in the proper period, reported in compliance with T.C.A. §§2-10-105 and 2-10-107, and reported in compliance with the Registry's rules;
- all monetary contributions were supported by bank statements and deposit slips;
- all in-kind contributions were supported by donation letters or other appropriate supporting documentation;
- all interest and other investment earnings received were reported, reported in the proper period, and supported by bank or investment statements;
- all loans received were reported to the Registry, reported in the proper period, reported in compliance with T.C.A. §§2-10-105 and 2-10-107, and reported in compliance with the Registry's rules; and
- all loans received from lending institutions were supported by loan agreements.

Audit Methodology:

The Registry obtained Richard Dawson's 2018 Campaign Financial Disclosure Statements from January 16, 2018 to January 15, 2019. We requested Mr. Dawson to provide his campaign records to support all contributions, loans, and interest that he received during his 2018 election campaign. Mr. Dawson's campaign records for contributions included bank statements, deposit slip copies, contributor check copies and contributor listings for online contributions. The following steps were performed on Mr. Dawson's campaign documentation:

- The documentation was reviewed to determine if the candidate's monetary contributions and interest received from January 16, 2018 to January 15, 2019 totaled \$141,128.68.

- A reconciliation of monetary contributions reported to funds deposited into the campaign accounts was prepared to determine if the candidate deposited all funds into a campaign bank account and properly reported the funds in his campaign account on his campaign disclosures.
- A listing of itemized monetary and unitemized contributions was prepared and compared to the candidate's disclosures reported during the election to determine if campaign contributions from individuals and PACs complied with campaign contribution limits, T.C.A. §2-10-301, et seq.; contributions were properly reported; contributions were reported in the proper period; contributions were reported in compliance with T.C.A. §§2-10-105 and 2-10-107; and contributions were reported in compliance with the Registry's rules.
- In-kind contributions by contributor was compared to the candidate's itemized contributions reported during the election to determine if campaign contributions from individuals and PACs complied with campaign contribution limits, T.C.A. §2-10-301, et seq.
- The documentation was reviewed to determine if the candidate's loans received from January 16, 2018 to January 15, 2019 totaled \$62,000.
- A list of loans received and payments made by source was prepared and compared to the candidate's bank statements to determine if the candidate deposited all loan proceeds into a campaign bank account and made all payments from campaign funds.
- The list of loans was reviewed to determine if all loan activity was reported to the Registry, reported in the proper period, reported in compliance with T.C.A. §§2-10-105 and 2-10-107, and all loans were in compliance with the Registry's rules.

Audit Conclusion:

Richard Dawson's 2018 Campaign Financial Disclosure Statements from January 16, 2018 through January 15, 2019 indicated that he received contributions totaling \$141,128.68. The candidate's campaign records indicated that he received contributions totaling \$142,186.63. The records indicated \$141,128.68 was deposited into the campaign account. The resulting difference in contribution amount received and the amount reported and deposited is related to a campaign fee expense that was withdrawn from the contributions collected by an online service prior to the contribution being deposited into the campaign account. The \$1,057.95 in un-deposited contributions were not reported by the candidate in violation of T.C.A. §2-10-105(a) (Finding 1). Relatedly, the candidate failed to report the online campaign contribution received when collected by the online services. The audit determined that \$7,466 in contribution were reported one reporting period late in violation of T.C.A. §2-10-107 (Finding 1). The campaign records also indicate the candidate maintained no records to support the contributor for \$260 in cash contributions in violation of T.C.A. § 2-10-105(f) (Finding 2).

In addition to the findings noted, the campaign records appear to indicate that the campaign account earned a dividend of \$23.52 which the candidate failed to report in violation of T.C.A. §2-10-131(b). The candidate improperly reported the contributor name for three contributions. He improperly reported a \$50 cash contribution to the general election that was for the primary election. No detailed findings for the unreported interest, the improper disclosure of contributor names, or the improper election disclosure was provided as the errors each represent less than 1% of all contributions reported by the candidate. In addition after discussed the errors with the candidate, he amended his report to add the interest, corrected the contributor name, and correct the improperly reported election.

FINDINGS

- 1. Richard Dawson violated T.C.A. §2-10-105(a) by failing to report \$1,057.95 in campaign contributions, the failure to report was the resulted of violating T.C.A. §2-10-107 by improperly reporting contributions and the related expenses from on online services used to collect contributions.**

Richard Dawson's campaign records indicate that as part of his campaign he used a vendor to assist in collecting campaign contributions. The campaign records and candidate's disclosures indicate that \$1,057.95 in the contributions received through the vendor for his 2018 campaign were unreported in violation of T.C.A. §2-10-105(a). The records also indicate the \$1,057.95 were withdrawn from the funds collected by the vendor prior to deposit into the campaign account for fees for the vendor's services. The campaign records and candidate's disclosures indicate those fees were unreported in violation of T.C.A. §2-10-105(a). Finally, the campaign's records indicate that \$7,466 in contributions received through the vendor were reported one reporting period late.

As is becoming more common in campaigns, Richard Dawson contracted with a vendor to collect contributions for his campaign using an online application. These type of vendors collect contributions in the name of the candidate by using various online payment methods (Credit Card, PayPal or other services). They also collected contributor data for campaign finance reporting. The vendor is also used to verify the contributor data collected is the same as the source of the funds being received. The vendor is usually paid for this service by charging a fee based on the amount of each contribution. The vendor then transfers the funds collected less the fee to the candidate's campaign account by check or electronic transfer. The vendor then provides the contributor data to the campaign which include the date the contribution was received, the amount of the original contribution, and the amount of the fee.

When such transactions like this are performed, Tennessee campaign finance statutes require the candidate to report the original amount of the contribution as a campaign contribution and the fee retained by the vendor as a campaign expense. Tennessee campaign finance statute also requires candidate's to report contributions when received by the campaign. As the vendor is acting as an agent of the campaign, the candidate is required to report the date of receipt of the contribution based on when the contribution was received by the vendor. Richard Dawson's audit indicated that he was reporting the contribution based on the net amount (Contribution less fee) which was improper. This resulted in both

contributions and expenses to be unreported. The total of the fees retain by the vendor for Mr. Dawson's 2018 election campaign was \$1,057.95.

Relatedly, a review of the candidate's campaign deposits compared to his campaign disclosures indicated that the candidate appears to be reporting contributions received when the contributions were deposited. This would only be correct if the related contribution was received on the same day it was deposited. Richard Dawson's records for check and cash contributions are not detailed enough to show when it was received, which is common for most campaigns audited. Unless a detailed record is provided the audit cannot verify the exact date a check or cash contribution is received by a campaign. The audit assumes the deposit date as the last possible date a contribution could have been received for determining the proper reporting period for campaign contributions when no such record exists. However, as noted above, the vendor maintains and provides the candidate data of when they receive a contribution and that date is the proper reporting date. Richard Dawson failed to report that date for most of his online contributions. The audit determined that of the improperly reported contributions, \$7,466 were reported on a campaign disclosures report, one reporting period later than what they were actually received.

2. Richard Dawson violated T.C.A. § 2-10-105(f) by failing to maintain contributor data for \$260 in cash contributions.

Richard Dawson did not maintain or obtain sufficient campaign records to verify compliance with all campaign finance statutes for cash contributions received. Mr. Dawson's campaign records indicated that he received cash contributions totaling \$260 for which he cannot identify the contributors (anonymous contributions). Without the specific contributor's names and amounts contributed, we could not determine Richard Dawson's compliance with the following campaign finance statutes for the cash contributions:

- T.C.A. §2-10-107(a)(2)(A)(i) requires contributions of more than \$100 from one source received during a reporting period to be itemized. The itemized information for each contributor must include name, address, occupation, employer, date of receipt, and amount of contribution.
- T.C.A. §2-10-311(a) limits cash contributions to \$50 per election for each contributor.

DISBURSEMENTS AND OBLIGATIONS

Audit Objectives:

The objectives of our audit of disbursements and obligations were to determine whether:

- all disbursements and obligations were supported by vendor receipts, canceled checks, and bank statements;
- all disbursements and obligations were made for non-prohibited activities; and

- all disbursements and obligations were reported, reported in the proper period, reported in compliance with T.C.A. §§2-10-107 and 2-10-114, and reported in compliance with the Registry rules.

Audit Methodology:

The Registry obtained Richard Dawson's 2018 Campaign Financial Disclosure Statements from January 16, 2018 to January 15, 2019. We requested Mr. Dawson provide campaign records to support all expenses during his 2018 election campaign. Mr. Dawson's campaign records for expenses included bank statements, cancelled checks, and vendor receipts/invoices. The following steps were performed on his campaign documentation:

- The documentation was reviewed to determine if the candidate's disbursements from January 16, 2018 to January 15, 2019 totaled \$135,141.59.
- A list of disbursements was prepared and compared to the candidate's bank statements and copies of cleared checks to determine if the candidate expended all funds from the campaign bank account.
- The list of disbursements was compared to the candidate's campaign disclosures and the bank statements to determine if all disbursements were reported.
- The list of disbursements were reviewed to determine if all expenditures were reported, reported in the proper period, reported in compliance with T.C.A. §§2-10-107 and 2-10-114, and reported in compliance with the Registry's rules.

Audit Conclusion:

Richard Dawson's 2018 Campaign Financial Disclosure Statements from January 16, 2017 to January 15, 2019 indicate that he had expenses totaling \$135,141.59. The audit determined the campaign incurred expenses totaling \$136,194.54 during the same period. The \$1,052.95 difference in the reported amount and the expenses incurred, relates to Mr. Dawson's failure to report \$1,057.95 in fees incurred from online contribution collections and a \$5 overstatement of food and beverage expenses during the 2018 Fourth Quarter. The failure to report the fee expenses is a violation of T.C.A. §2-10-105(a). As the failure to report fees was related to the failure to report campaign contributions the details of error are noted in the contribution and receipts section in Finding 1. No detailed finding for the \$5 overstated expenses was provided as the error represents less than 1% of all expenses reported by the candidate. In addition after discussing the errors noted with the candidate, the candidate corrected the reported expense amount on an amended report.

The campaign records also indicated that the candidate violated T.C.A. §2-10-212(c) by failing to retain sufficient expense records to determine whether all expenditures were allowable Finding 3. The candidate's campaign disclosures and records appear to indicate the candidate was reporting expenses as they cleared the bank, not as they were being incurred as required by

T.C.A. §2-10-107(2)(B) (Finding 3). Also, the candidate failed to itemized \$50 in expenses to a vendor who was paid more than \$100 during the 2018 First Quarter. No detailed findings for the improperly unitemized expense was provided as the error represents less than 1% of all expenses reported by the candidate. In addition after discussing the errors noted with the candidate, the candidate corrected the improperly reported expense on an amended report.

3. Richard Dawson violated of T.C.A. §2-10-212(c) failing to maintain sufficient campaign records to support activities associated with disbursements.

The audit requested that Richard Dawson provide all bank statements, canceled checks, receipts, invoices and any other supporting documentation for all campaign activities for expenses. Richard Dawson provided bank statements for the period January 16, 2018 through January 15, 2019, and cancel checks for all disbursed campaign checks except two. For credit card/debit card (bank card) purchases, the bank statements provided the name of the vendor, partial location and date of the transaction along with payment made. This data allowed the audit to confirm payments were made to the reported vendors/payees. However, the audit determine the candidate failed to retain vendor receipts, invoices, or other applicable supporting data for 43 of the approximately 102 disbursement (42%) made by the campaign during the 2018 campaign. Although the disclosures indicate the purpose of the purchases and appear likely based on the vendor, the audit cannot confirm the purpose for any of the 43 transactions nor assess whether an expense is allowable per the campaign finance statutes without a receipt, invoice, contract or other third party supporting document. Included in the transactions were several transactions to vendors that commonly provide receipts when purchases are made (Such as Kroger, Staples, Home Depot, or Dominoes). Also included were two payments to register PACs for advertising/ mailing services. These PACs may not normally issue receipts for contribution received but should be providing information for expense being paid by the candidate for reporting purposes. Lastly there were nine transactions totaling \$16,800 to an individual as a campaign manager.

Relatedly, a review of the candidate's campaign bank statements compared to his campaign disclosures indicated that the candidate appears to be reporting expenses when the transaction appears on the campaign bank statement (debit card being reported when entry appears on statement and check based on the date it clears the bank). This would only be correct if the expense was incurred on the same day it is disclosed on the bank statement. Although this can happen for electronic transactions including debit cards it is not always the case as even debit transactions may delay a day or more before being processed by the candidate's bank. T.C.A. §2-10-107(2)(B) requires the candidate to report expenses when incurred. Except in the case of an obligation (which are also reportable), expenses are incurred when services are received and payment is made (check written, debit/credit card presented, or electronic transfers are authorized). For debit card transactions, the receipt or invoice date is the better date to use to report the date an expense was incurred and can be a second record for the check written date. Except for check transactions most of the reporting expenses will be within a few days of the proper reporting date and appear on the proper disclosure. However, the audit noted three expenses totaling \$4,870.40 paid by checks improperly reported on a campaign disclosure report, one reporting period later then what they were actually incurred per the check date.

RECOMMENDATION TO CANDIDATE

Richard Dawson should amend his 2018 Campaign Financial Disclosure Statements to ensure that he properly reports all contributions that have been received and disbursements made. Also, he should amend his reports to properly disclose contributions when received and expenditures when incurred. Mr. Dawson should amend his 2018 Campaign Financial Disclosure Statements to show all dividends\interest earned by the campaign account. In addition, he should amend his report to properly report the election and contributor names for all contributions.

For future election and remaining transactions, the candidate should develop a campaign record-keeping system that adequately meets the requirements of the campaign financial disclosure statutes. The system should ensure that the campaign reports contributions and expenses fully and correctly. In addition, the record keeping system should include the retention of all vendor invoices/receipts and other documentation to show funds disbursed from the campaign are allowable. For payroll type transactions for which an invoice or receipt may not be provided, the Registry audit staff recommends the candidate maintain a record of services performed, date performed and amount paid and have the records signed by the payee. Finally, the candidate should reconcile the campaign bank account or other account records to the campaign disclosure statements to ensure that all campaign finance activities are properly recorded and reported.

RECOMMENDATION TO REGISTRY

We recommend the Members of the Registry consider the findings for possible further action. We recommend the Registry approve the audit performed as being sufficient and complete. Finally, we recommend the Registry post the audit report to the Registry's web site notwithstanding whether a significant penalty is assessed as outlined in T.C.A. §2-10-212(f). The report and related findings will assist current and future candidates in understanding the audit process, the purposes of Registry rules and types of procedures needed to comply with campaign finance laws.

RESOLUTIONS

CANDIDATE'S CORRECTIVE ACTIONS

After discussing the findings with Richard Dawson, he chose to take corrective action on his reports prior to the Registry's approval of the audit. Richard Dawson amended his 2018 First Quarter, 2018 Second Quarter, 2018 Pre-Primary, 2018 Third Quarter, 2018 Pre-General and 2018 Fourth Quarter Campaign Financial Disclosure Statements on June 24, 2018 and June 25, 2019. The corrections made and their effects on the findings reported are detailed below.

Corrective Actions - Finding 1:

Richard Dawson amended all his 2018 campaign finance filing reports and itemized all his campaign contributions. He also placed all contributions on the proper report based on when they were received. While making these corrections, he also corrected the reported contribution dates and amounts to all online contributions to properly show the contribution amount prior to the fee. He also added the online contribution fees to each report based on the contributions reported on each report. The amended reports properly disclose all contributions and the related online contribution fees in all periods as noted in Finding 1.

Corrective Actions – Audit conclusions:

While amending all his 2018 campaign finance filing reports, Richard Dawson also corrected cash contribution to be properly reported to both the general and primary election including the \$50 noted in the audit conclusion. He added the unreported \$23.52 in interest earned and corrected the improperly reported contributors.

Similar to contribution Richard Dawson amended his expenses to itemize most of the expenses incurred by the campaign and moved expenses to properly report them based on when they were incurred. While making this correction he corrected the improperly reported expense noted in the audit conclusion by reducing one expense by \$5. The amended reports properly corrected all errors noted in the audit conclusions that were not included in the audit findings.

Corrective Actions - Finding 2:

Richard Dawson followed the Registry staff recommendations and donated \$260 to a charitable organization (these were the anonymous funds that could not be used for campaign purposes). The candidate provided a copy of the check from the campaign supporting the donations. He also chose to early report the donation and added the expense to his amended 2019 Mid-Year report amended on July 30, 2019.

REGISTRY OF ELECTION FINANCE ACTIONS

The Members of the Registry of Election Finance will review the 2018 campaign finance audit of Richard Dawson during the September 11, 2019 regular monthly meeting. Approval and any subsequent actions taken by the board will be documented in the board minutes.