



TENNESSEE REGISTRY OF ELECTION FINANCE

Campaign Finance Audit of Bob Rochelle Election Year 2006



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April 2, 2008

Members of the Registry of Election Finance
404 James Robertson Parkway, Suite 1614
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Ladies and Gentlemen,

Transmitted herewith are the agreed upon procedures for the campaign finance audit of Bob Rochelle's 2006 election campaign for the Senate. 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 Registry's internal 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 Manager

STATE OF TENNESSEE
REGISTRY OF ELECTION FINANCE
Audit Highlights
Bob Rochelle
2006 Campaign Finance Audit

AUDIT OBJECTIVES

The objectives of the audit were to determine Bob Rochelle's compliance with certain provisions of campaign finance disclosure laws and regulations; compliance with certain provisions of campaign contribution limits laws and regulations; accuracy and completeness of the disclosures on the 2006 Second Quarter, 2006 Pre-Primary, 2006 Third Quarter, 2006 Pre-General, and 2006 Fourth Quarter Campaign Financial Disclosure Statements; and to recommend appropriate actions to correct any deficiencies.

FINDINGS

1. Mr. Rochelle received contributions from one individual in excess of campaign limits. Mr. Rochelle received contributions in excess of campaign limits from one contributor, which violated T.C.A. §2-10-302. The contributions exceeded the campaign finance limit by \$1,000.00.

2. Mr. Rochelle failed to itemize all contributions from individuals who contributed more than \$100.00 during the reporting period. Mr. Rochelle failed to itemize all contributions from seven individuals who contributed a total amount of more than one hundred dollars (\$100.00) during a reporting period. The improper classification violated T.C.A. §2-10-107(a)(2)(A)(i).

3. Mr. Rochelle failed to report all of the interest that he earned from his campaign savings account. Mr. Rochelle did not report \$933.24 in interest earned from his campaign savings account, which violated T.C.A. §2-10-105(a).

4. Mr. Rochelle did not follow the Registry rules for bookkeeping. Mr. Rochelle did not follow the Registry rules for bookkeeping procedures. Although not required by statute, the Registry has developed guidance for candidates for maintaining their records of campaign activities. Mr. Rochelle's adherence with the bookkeeping rules may have averted the other findings reported.

5. Mr. Rochelle failed to report all campaign expenditures. Mr. Rochelle's campaign records indicated that he disbursed \$1,456.71 from his campaign account for seven expenditures; however, the candidate failed to disclose the expenditures on any report. The failure to disclose the expenditures violates T.C.A. §2-10-105(a), which requires the disclosure of all campaign expenses.

6. Mr. Rochelle failed to itemize all expenses to payees who he paid more than \$100.00 during a reporting period. Mr. Rochelle failed to report seven expenditures pursuant to T.C.A. §2-10-107(a)(2)(B), which requires payments of more than \$100.00 to one source during a reporting period to be itemized. Mr. Rochelle improperly reported \$292.65 (0.04% of itemized expenses reported) of his expenses as un-itemized that were required to be itemized.

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INTRODUCTION

AUDIT AUTHORITY

In February 2006, the Tennessee Legislators and Governor Phil Bredesen enacted the “Comprehensive Governmental Ethics Reform Act of 2006,” which amended Tennessee’s campaign finance disclosure laws and duties of the Registry of Election Finance. The legislation established the audits of campaign disclosure reports. *Tennessee Code Annotated* (T.C.A.) §§2-10-206 and 2-10-212 authorize the Registry of Election Finance (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

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 an election year, the disclosures expand to quarterly reports, pre-primary reports, and pre-general reports. This audit relates to disclosures made subsequent to the passage and approval of the Comprehensive Governmental Ethics Reform Act of 2006. The act was approved on February 15, 2006. Therefore, the audit reviewed only Mr. Rochelle’s disclosures on his 2006 Second Quarter, 2006 Pre-Primary, 2006 Third Quarter, 2006 Pre-General, and 2006 Fourth Quarter Campaign Financial Disclosure Statements. As of February 29, 2008, the candidate had filed the 2006 Annual Mid-Year Supplemental (2007) and the 2006 Annual Year-End Supplemental (2007) Campaign Financial Disclosure Statements, which covered campaign activities from January 16, 2007 to June 30, 2007 and July 1, 2007 to January 15, 2008, respectively. The reports were part of the candidate’s 2006 campaign disclosures; however, the disclosures were not included in the audit procedures since the reports were prepared after the commencement of the audit process in March 2007.

CAMPAIGN OVERVIEW

CAMPAIGN ORGANIZATION

Mr. Rochelle was a candidate in the November 7, 2006 general election for the Senate for district 17. Mr. Rochelle filed an Appointment of Political Treasurer Statement with the Registry on April 13, 2006 appointing Vicki Jarvis as political treasurer.

The candidate's first financial disclosure for the 2006 campaign was the 2006 second quarter report filed on July 10, 2006. As of February 29, 2008, Mr. Rochelle's most current financial disclosure report was the 2006 annual year-end supplemental (2007), which he filed on January 16, 2008. The 2006 annual year-end supplemental (2007) report indicated \$1,265.78 in cash on hand, \$0.00 in outstanding obligations, and \$10,000.00 in outstanding loans. The candidate has not completed his 2006 election campaign reporting requirements. The candidate's next report will be due on July 15, 2008 and will cover the period of January 16, 2008 to June 30, 2008.

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: 2006 second quarter, 2006 pre-primary, 2006 third quarter, 2006 pre-general, 2006 fourth quarter, and 2006 annual mid-year supplemental (2007) reports after amendments. As noted in the audit scope, we only audited disclosures from the 2006 second quarter through the 2006 fourth quarter. The amounts displayed are for informational purposes only.

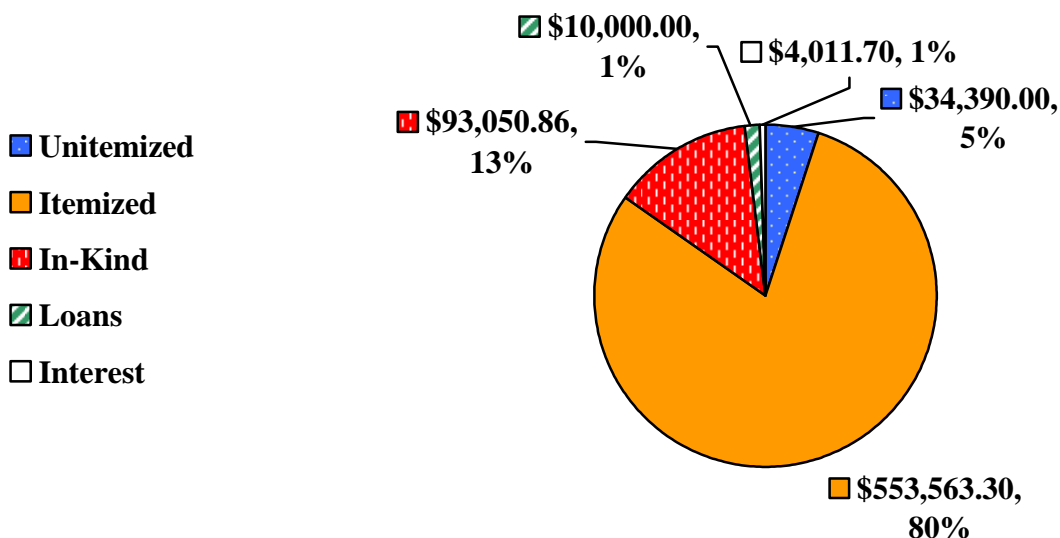
<u>Summary of Financial Activity</u>		
(Un-audited Amounts)		
Cash on hand at January 1, 2005		\$167,782.26 ¹
Receipts		
Itemized	\$553,563.30	
Un-itemized	34,390.00	
Interest	4,011.70	
Loans received	10,000.00	
Total receipts		<u>\$601,965.00</u>
Disbursements		
Itemized	764,216.87	
Un-itemized	4,264.61	
Loans principal payments	0.00	
Total disbursements		<u>\$768,481.48</u>
Cash on hand at June 30, 2007		<u>\$1,265.78</u>
Loans outstanding at June 30, 2007		\$10,000.00
Obligations at June 30, 2007		\$0.00
Total in-kind contributions received		\$93,050.86

¹ The cash balance at 1/1/2005 was funds transferred from the candidate's 1998 campaign.

CHARTS

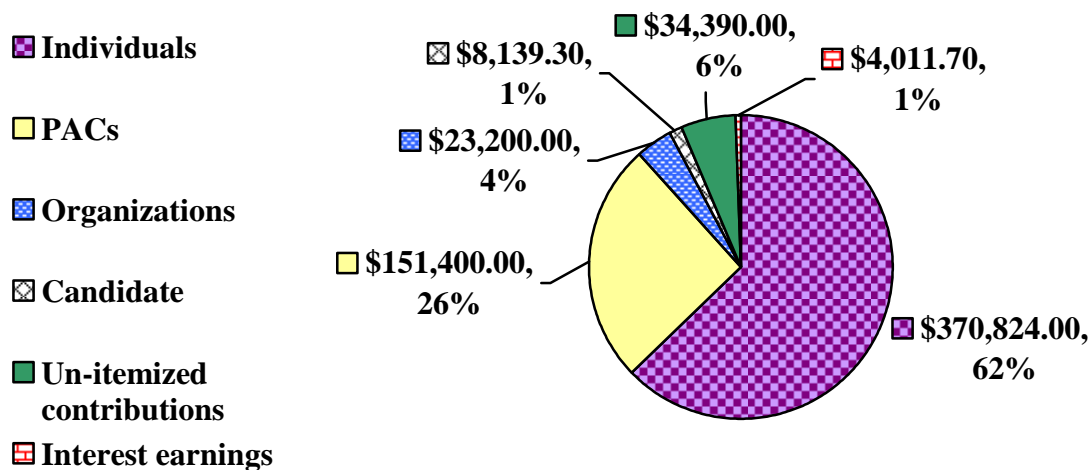
2006 ELECTION CAMPAIGN CONTRIBUTIONS

The following chart shows the contributions reported by the candidate for the 2006 election campaign.



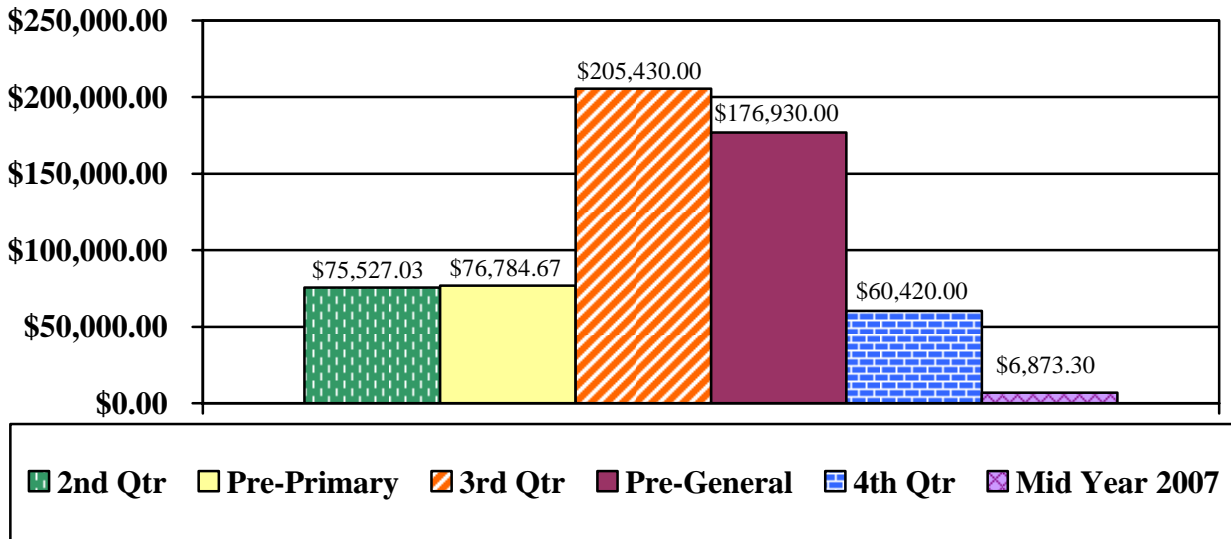
2006 CONTRIBUTIONS BY SOURCE

The following chart shows the monetary contributions reported by the candidate for the 2006 election campaign. Organizations in this chart represent non-profit organizations, individual campaign organizations, or businesses.



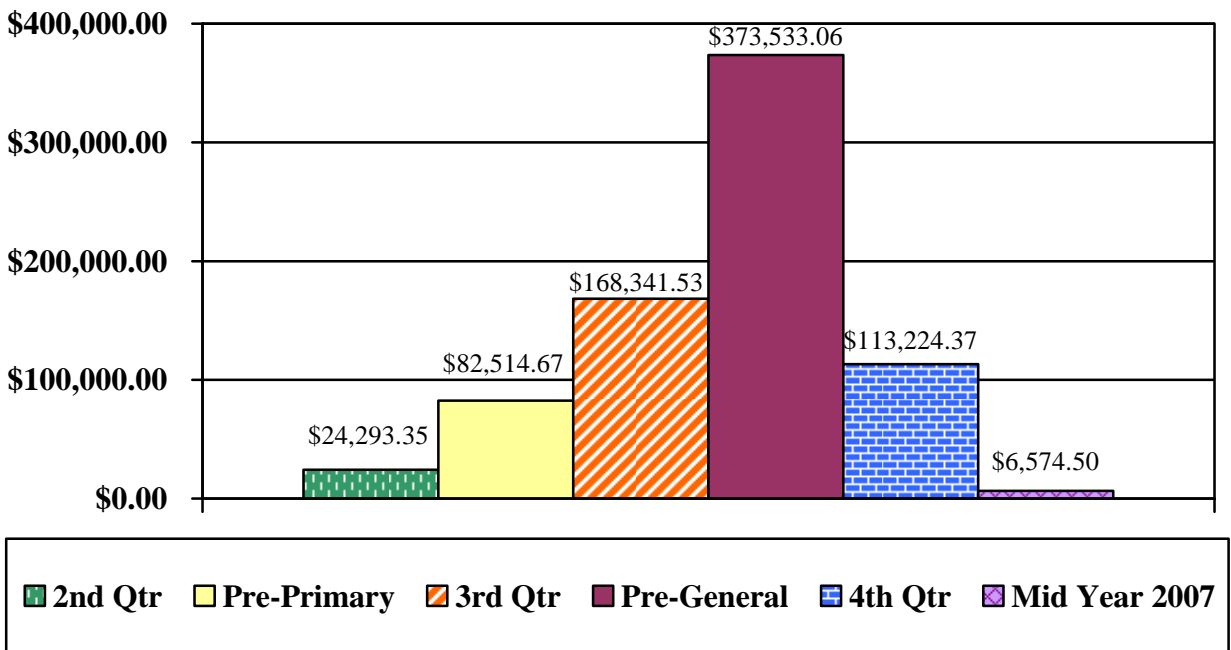
2006 ELECTION CONTRIBUTIONS BY REPORTING PERIOD

The following chart shows the contributions that the candidate reported for the 2006 election campaign by reporting period.



2006 ELECTION EXPENSES BY REPORTING PERIOD

The following chart shows the expenses that the candidate reported for the 2006 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:

- campaign contributions from individuals and Political Action Committees (PAC) were within 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 letter 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;
- loans received were reported to the Registry, reported in the proper period, and in compliance with T.C.A. §§2-10-105 and 2-10-107, and reported in compliance with the Registry's rules; and
- loans received from lending institutions were supported by loan agreements.

Audit Methodology:

The Registry obtained Mr. Rochelle's 2006 Campaign Financial Disclosure Statements from April 1, 2006 to January 15, 2007. We requested Mr. Rochelle to provide his campaign records to support all contributions, loans, and interest that he received during his 2006 election campaign. Mr. Rochelle's campaign records for contributions included bank statements, deposit slip copies, check copies, receipts list, and in-kind contributions list. The following steps were performed on Mr. Rochelle's campaign documentation:

- The documentation was reviewed to determine if the candidate's monetary contributions received from April 1, 2006 thru January 15, 2007 totaled \$581,080.00.

- A list of monetary contributions was prepared and compared to the candidate's bank statements to determine if the candidate deposited all funds into a campaign bank account and properly recorded the funds.
- The documentation was reviewed to determine if the candidate's in-kind contributions received from April 1, 2006 thru January 15, 2007 totaled \$93,050.86.
- A list of monetary and in-kind contributions by contributor was prepared and 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 candidate's bank statements were reviewed to determine if the candidate received interest from April 1, 2006 thru January 15, 2007 totaling \$4,011.70.
- A schedule of interest earnings was prepared and compared to the candidate's bank statements to determine if all interest and investment earnings received were reported and reported in the proper period.
- Contributions lists and bank statements were reviewed to determine if all receipts were reported, all receipts received were reported, all contributions were reported in the proper period, all contributions were reported in compliance with T.C.A. §§2-10-105 and 2-10-107, and all contributions were reported in compliance with the Registry's rules.
- The documentation was reviewed to determine if the candidate's loans received from April 1, 2006 thru January 15, 2007 totaled \$10,000.00.
- A schedule 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 schedule of loans was compared to loan agreements or other supporting documentation to determine the source and terms of the loans received.
- The schedule 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:

Mr. Rochelle's 2006 Campaign Financial Disclosure Statements from April 1, 2006 to January 15, 2007 included the 2006 second quarter, 2006 pre-primary, 2006 third quarter, 2006 pre-general, and 2006 fourth quarter. Mr. Rochelle's campaign records indicated that he received contributions that exceeded campaign limits laws. (Finding 1) In addition, Mr. Rochelle failed to

itemize contributions from individuals who contributed a total amount of more than one hundred dollars (\$100.00) during a reporting period in violation of T.C.A. §2-10-107(a)(2)(A)(i). (Finding 2) Mr. Rochelle's bank statement records indicated that he did not report all interest earnings received. (Finding 3) Mr. Rochelle's campaign records indicated that he reported \$4,315.50 more than the amount deposited into his campaign bank account. The difference indicated that Mr. Rochelle did not reconcile his bank accounts to his campaign disclosure statements, which is a violation of Registry rules. (Finding 4) Mr. Rochelle's campaign records indicated that the in-kind contributions that he reported complied with campaign finance limits and complied with campaign finance laws.

FINDING

1. Mr. Rochelle received contributions from one individual in excess of campaign limits.

One individual's total contributions for the primary and the general election exceeded the campaign finance limits. T.C.A. §2-10-302(a) states, "No person shall make contributions to any candidate with the respect to any election which, in the aggregate, exceed:...(2) For any other state or local public office, one thousand dollars (\$1,000)." T.C.A. §2-10-307(a) states that a candidate shall not accept a contribution in violation of T.C.A. §2-10-302(a). Mr. Rochelle's campaign records indicated that one individual contributed \$3,000.00 for the 2006 primary and general elections. As a result, \$1,000.00 of the individual's total contributions was in violation of the campaign limits.

2. Mr. Rochelle failed to itemize all contributions from individuals who contributed more than \$100.00 during the reporting period.

Mr. Rochelle did not itemize contributions from seven individuals who contributed a total amount of more than one hundred dollars (\$100.00) during a reporting period.

- Mr. Rochelle received two \$100.00 checks from an individual during the third quarter reporting period. He included the \$200.00 on the third quarter report's un-itemized contributions.
- Mr. Rochelle received two \$100.00 checks from another individual during the third quarter reporting period. He included the \$200.00 on the third quarter report's un-itemized contributions.
- Mr. Rochelle received two \$100.00 checks from another individual during the pre-general reporting period. He included the \$200.00 in contributions on the pre-general report's un-itemized contributions.
- Mr. Rochelle reported an itemized contribution of \$125.00 from an individual on his third quarter report. He reported an additional \$100.00 contribution from the same individual on his third quarter report as an un-itemized contribution.

- Mr. Rochelle received a \$200.00 check from an individual during the pre-general reporting period. He included the \$200.00 on the pre-general report's un-itemized contributions.
- Mr. Rochelle received a \$200.00 check from an individual during the fourth quarter reporting period. He included the \$200.00 on the fourth quarter report's un-itemized contributions.
- Mr. Rochelle received a \$200.00 check from an individual during the fourth quarter reporting period. He included the \$200.00 on the fourth quarter report's un-itemized contributions.

The ten un-itemized contributions totaling \$1,300.00 (0.24% of itemized contributions reported) were required to be itemized; therefore, Mr. Rochelle violated T.C.A. §2-10-107(a)(2)(A)(i), which requires contributions of more than \$100.00 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 the contribution.

3. Mr. Rochelle failed to report the interest that he earned from his campaign savings account.

Mr. Rochelle failed to report all of the interest that he earned from his 2006 campaign savings account. Mr. Rochelle received a total of \$933.24 in interest from his campaign savings account during the second quarter, third quarter, and pre-general reporting periods; however, he did not report the amount as interest earned on his campaign disclosure reports. According to T.C.A. §2-10-102(4) interest earned is defined as a contribution. Therefore, Mr. Rochelle failed to report all contributions pursuant to T.C.A. §2-10-105(a), which requires candidates to report all contributions received and all expenditures made by or on behalf of the candidate or committee.

4. Mr. Rochelle did not follow the Registry rules for bookkeeping.

Mr. Rochelle did not follow Registry rules for bookkeeping. Although not required by statute, the Registry has developed guidance for candidates for maintaining the records of campaign activities. This guidance is not the sole method for maintaining records and does not include all variations of campaign activities; however, if the candidate had followed the guidance, he may have averted the findings noted above. The candidate did not implement Registry Rule 0530-1-1-.02(8) which states that a candidate should perform bank reconciliations that reconcile the bank account and the campaign records to the financial disclosure statements.

Failure to reconcile bank accounts to disclosure statements may result in inaccurate disclosures. For example, Mr. Rochelle reported \$581,080.00 in total contributions; however, Mr. Rochelle's campaign bank account records indicated he deposited \$575,765.00 in contributions, a difference of \$4,315.00. Of the \$4,315.00 difference, Mr. Rochelle reported two contributions at the incorrect amounts resulting in an overstatement of \$850.00. In addition, Mr. Rochelle reported three contributions totaling \$700.00 that were not deposited into the campaign account. Mr. Rochelle reported the remaining difference of \$2,765.00 as un-itemized contributions, which were not supported by campaign records.

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 Mr. Rochelle's 2006 Campaign Financial Disclosure Statements from April 1, 2006 to January 15, 2007. We requested Mr. Rochelle to provide his campaign records to support all expenses that he had during his 2006 election campaign. Mr. Rochelle's campaign records for expenses included bank statements with cancelled checks, vendor receipts, disbursement requests, disbursement lists, check stubs, and other supporting documentation. The following steps were performed on Mr. Rochelle's campaign documentation:

- The documentation was reviewed to determine if the candidate's disbursements from April 1, 2006 thru January 15, 2007 totaled \$761,906.98.
- 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 and bank statements were reviewed to determine if all expenses were reported, reported in the proper period, reported in compliance with T.C.A. §§2-10-107 and 2-10-114, and in compliance with the Registry's rules.

Audit Conclusion:

Mr. Rochelle's 2006 Campaign Financial Disclosure Statements and campaign records indicated that he reported \$761,906.98 in total expenses from April 1, 2006 to January 15, 2007. As outlined in Finding 4, Mr. Rochelle did not follow Registry Rule 0530-1-1-.02(8) for performing reconciliations between his bank account and his financial disclosure statements. As a result, the candidate failed to report campaign expenditures totaling \$1,456.71 in violation of campaign finance laws. (Finding 5) Mr. Rochelle's campaign records indicated that he failed to itemize all expenses to payees who he paid more than \$100.00 during a reporting period. (Finding 6) In addition, Mr. Rochelle failed to retain all vendor receipts for expenses as required by T.C.A. §2-10-212(c) (Finding 7). The campaign records and disclosures indicated that all expenses, except those noted in the findings, complied with campaign finance laws. Mr. Rochelle reported no obligations or loan payments during the 2006 election campaign.

FINDINGS

5. Mr. Rochelle failed to report all of his campaign expenditures.

Mr. Rochelle's campaign records indicated that he did not disclose the following seven campaign expenditures:

- one expenditure to Steven Francois of \$1,065.70 on July 24, 2006 for consulting,
- two expenditures to Bank of South of \$5.46 and \$100.00 on April 13, 2006 and April 27, 2006 for bank fees,
- two expenditures to SunTrust Bank of \$45.85 and \$96.69 on September 12, 2006 and October 11, 2006 for merchant bank fees, and
- two expenditures to American Express of \$55.26 and \$87.75 on October 5, 2006 and November 6, 2006 for merchant bank fees.

Mr. Rochelle did not report the expenditures totaling \$1,456.71 (0.19% of total expenditures reported) on his campaign financial disclosure statements. The failure to report these expenditures violated T.C.A. §2-10-105(a), which requires a candidate to prepare a statement of all expenditures made by or on behalf of the candidate.

6. Mr. Rochelle failed to itemize all expenses to payees who he paid more than \$100.00 during a reporting period.

Mr. Rochelle failed to report seven expenditures pursuant to T.C.A. §2-10-107(a)(2)(B), which requires payments of more than \$100.00 in total to one source during a reporting period to be itemized. The itemized expenditures must include the name, address, amount paid to the source, and the purpose of the payment that clearly identifies that the expenditure was allowable. Mr. Rochelle did not properly itemize the following expenditures:

- Mr. Rochelle reported an itemized expenditure of \$158.20 to OfficeMax on his pre-general report. An additional expenditure of \$27.60 to the same vendor was reported on his pre-general report as an un-itemized expenditure under the category “office supplies.”
- Mr. Rochelle reported four expenditures totaling \$148.21 to OfficeMax on his fourth quarter report as an un-itemized expenditure under the category “office supplies.”
- Mr. Rochelle reported two itemized expenditures of \$647.62 and \$1,395.12 to Kara Warrion on his fourth quarter report. An additional expenditure of \$83.82 written to the same individual was reported on his fourth quarter report as an un-itemized expenditure under the category “mileage.”
- Mr. Rochelle reported an itemized expenditure of \$589.57 to BellSouth on his fourth quarter report. An additional expenditure of \$33.02 to the same vendor was reported on his fourth quarter report as an un-itemized expenditure under the category “office supplies.”

Mr. Rochelle improperly reported expenditures of \$292.65 (0.04% of itemized expenditures reported) as un-itemized that were required to be itemized.

RECOMMENDATION TO CANDIDATE

Mr. Rochelle should review total contributions from each contributor and refund any contributions in excess of campaign contribution limits. Mr. Rochelle should amend the applicable financial disclosure statements based on his review of contributions and refunds paid. In addition, Mr. Rochelle should amend his reports to ensure that he reported all individuals that contributed more than \$100 during the reporting period as itemized. Mr. Rochelle should ensure the campaign adopts and maintains a record-keeping system to determine the aggregate amount of contributions received per election from each contributor. In addition, Mr. Rochelle should amend his campaign financial disclosure reports to include all interest earnings.

Mr. Rochelle should amend his campaign financial disclosure reports to include all campaign expenditures and properly disclose all expenditures that were required to be itemized. The candidate should retain all checks, bank statements, and vendor receipts in order to comply with the audit process and to verify his compliance with campaign finance statutes. To verify that all campaign contributions and disbursements are properly recorded and reported, the candidate should ensure the campaign bank account reconciles to the campaign disclosure statements.

RECOMMENDATION TO REGISTRY

We recommend the Registry approve the audit performed as being sufficient and complete. Additionally, we recommend the Registry post the audit report to the Registry’s website. 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 notifying Mr. Rochelle of the above findings, he chose to take corrective actions on his reports prior to the Registry's approval of the audit. Mr. Rochelle amended his 2006 Second Quarter, Pre-Primary, Third Quarter, Pre-General, and Fourth Quarter Campaign Financial Disclosure Statements on March 20, 2008.

Corrective Actions - Finding 1:

Mr. Rochelle refunded the \$1,000.00 contribution that exceeded the campaign finance limits on March 17, 2008. Per our instruction, Mr. Rochelle will adjust the contribution on his next report.

Corrective Actions - Finding 2:

On his amended third quarter, pre-general, and fourth quarter reports, Mr. Rochelle moved \$1,300.00 from un-itemized contributions to itemized contributions by making the changes below. The current amended reports properly disclosed these contributions.

- On his amended third quarter report, Mr. Rochelle moved \$500.00 from un-itemized contributions to itemized contributions by itemizing five \$100.00 contributions from individuals that contributed more than \$100.00 during the reporting period. The current amended report properly disclosed these contributions.
- On his amended pre-general report, Mr. Rochelle moved \$400.00 from un-itemized contributions to itemized contributions by itemizing two \$100.00 contributions from one individual and a \$100.00 contribution from one individual that contributed more than \$100.00 during the reporting period. The current amended report properly disclosed these contributions.
- On his amended third quarter report, Mr. Rochelle moved \$400.00 from un-itemized contributions to itemized contributions by itemizing two \$200.00 contributions from individuals that contributed more than \$100.00 during the reporting period. The current amended report properly disclosed these contributions.

Corrective Actions - Finding 3:

Mr. Rochelle amended the reports listed below to add the \$933.24 in total interest earned that he did not initially report. The current amended reports properly disclosed these interest earnings.

- Mr. Rochelle amended his second quarter report by adding \$9.70 in interest earned during the reporting period.
- Mr. Rochelle amended his third quarter report by adding \$908.39 in interest earned during the reporting period.
- Mr. Rochelle amended his pre-general report by adding \$15.15 in interest earned during the reporting period.

Corrective Actions - Finding 4:

Mr. Rochelle amended his third quarter report to correct the two contributions that he reported at incorrect amounts by changing one individual's contribution from \$200.00 to \$250.00 and by changing another individual's contribution from \$1,000.00 to \$100.00. The current amended reports properly disclosed these contributions.

Corrective Actions - Finding 5:

Mr. Rochelle amended the reports listed below to add the \$1,456.71 in expenditures that he initially failed to report. The current amended reports properly disclosed these expenditures.

- Mr. Rochelle amended his second quarter report by adding itemized expenditures of \$5.46 and \$100.00 to Bank of South for bank fees.
- Mr. Rochelle amended his pre-primary report by adding an itemized expenditure of \$1,065.70 to Steven Francois for consulting.
- Mr. Rochelle amended his third quarter report by adding an itemized expenditure of \$45.85 to SunTrust Bank for bank fees.
- Mr. Rochelle amended his pre-general report by adding an itemized expenditure of \$55.26 to American Express for bank fees and by adding an itemized expenditure of \$96.69 to SunTrust Bank for bank fees.
- Mr. Rochelle amended his fourth quarter report by adding an itemized expenditure of \$87.75 to American Express for bank fees.

Corrective Actions - Finding 6:

On his amended pre-general and fourth quarter reports, Mr. Rochelle moved \$292.65 from un-itemized expenditures to itemized expenditures by making the changes below. The current amended reports properly disclosed these expenditures.

- Mr. Rochelle added an itemized expenditure to OfficeMax of \$27.60 on his pre-general report. He then removed \$27.60 from the un-itemized expenditures for “office supplies.”
- Mr. Rochelle added an itemized expenditure to Kara Warrion of \$84.63 on his fourth quarter report. He then removed \$83.82 from the un-itemized expenditures for “mileage.”
- Mr. Rochelle added itemized expenditures to OfficeMax of \$13.11, \$45.11, \$26.69, and \$63.30 on his fourth quarter report. In addition, Mr. Rochelle added an itemized expenditure to Bellsouth of \$33.02 on his fourth quarter report. He then removed \$189.27 from the un-itemized expenditures for “office supplies.”

REGISTRY OF ELECTION FINANCE ACTIONS

The Members of the Registry of Election Finance reviewed the 2006 campaign finance audit of Mr. Rochelle during the April 9, 2008 regular monthly meeting. The report contained seven findings for corrective actions. The Registry voted to accept and approve the audit report with no further action.