

# STATE OF RHODE ISLAND BOARD OF ELECTIONS

CAMPAIGN FINANCE AUDIT

JENNIFER C. DOUGLAS



Audit Conducted By: Richard E. Thornton, Director of Campaign Finance

# STATE OF RHODE ISLAND BOARD OF ELECTIONS

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## TABLE OF CONTENTS

| Introduction     | 4 |
|------------------|---|
| Scope            | 5 |
| Methodology      | 5 |
| History          | 5 |
| Findings         | 5 |
| Summary          | 6 |
| Auditee Response | 6 |
| Action           | 6 |

#### INTRODUCTION

#### **Audit Authority**

Pursuant to Rhode Island General Law §17-25-5(a)(8), the Board of Elections is authorized to perform any duties that are necessary to implement the provisions of Chapter 25 of Title 17. Without limiting the generality of this provision, the Board is authorized and empowered to: Conduct compliance reviews and audits of campaign accounts as necessary, and in a manner consistent with the provisions of Chapter 25, Title 17.

#### **Audit Purpose**

Campaign Finance audits assist the Board of Elections with enforcement of campaign finance laws, provides a tool to evaluate the effectiveness of those laws and the campaign finance reporting process, verifies the accuracy and propriety of campaign finance receipts and validity and legality of campaign finance expenses and helps provide timely and accurate information to the public.

Campaign Finance audits assist and encourage candidate compliance with campaign finance reporting laws and promotes candidate accountability and integrity.

#### Scope:

Review campaign finance reports and supporting documentation for the period July 1, 2021 through March 31, 2023.

#### Methodology: Review Contributions:

- Compare contributions received to bank statement deposits
- Compare contributions received to contributions reported on campaign finance reports
- Verify there are no prohibited contributions
- · Verify contributions do not exceed aggregate annual limit

#### Review Expenditures:

- Compare expenditures made to bank statement checks/debits
- Compare expenditures made to expenditures reported on campaign finance reports
- Verify there are no prohibited uses of campaign funds
- Verify campaign expenditures are valid and legal.

#### History:

In June 2023, the Board of Elections ("Board") initiated an audit of the campaign account of Jennifer C. Douglas ("Douglas") pursuant to R.I.G.L. §17-25-5(a), due to Douglas' failure to submit documentation to the Board supporting her campaign finance reports from the fourth quarter 2021 through the fourth quarter 2022 as so provided in the Consent Order executed November 2, 2021; and her failure to submit a copy of her 2022 campaign bank account statement pursuant to R.I.G.L. §17-25-11(c)(2).

On June 23, 2023, the Board received via subpoena served upon the bank of Douglas' campaign account, campaign depository account bank statements, bank deposits, and checks deposited into and checks written from the account, for the period July 1, 2021 through March 31, 2023.

#### Findings:

The following are Findings of campaign finance violations discovered during the Audit Review of Douglas' campaign account and supporting documentation:

#### Contributions:

 \$4,697.73 in contributions or receipts were not disclosed on any campaign finance report filed with the Board, in violation of R.I.G.L. §17-25-11.

#### **Expenditures:**

- \$4,536.35 in campaign expenditures, representing thirty-three (33) transactions, were not disclosed on campaign finance reports filed with the Board, in violation of R.I.G.L. §17-25-11.
- \$725.21 in expenditures that were not disclosed were used to pay for expenses, representing eleven (11) transactions, that could not be validated as expenses related to the campaign, in violation of R.I.G.L. §17-25-7.2.
- \$1,092.00 in Accounts Payable debt was not disclosed on a campaign finance report filed with the Board, in violation of R.I.G.L. §17-25-11.

**Summary**: The Audit Review of Douglas' campaign account and supporting documentation for the period July 1, 2021 through March 31, 2023 demonstrates:

- \$4,697.73 in campaign contributions received were not disclosed on campaign finance reports filed with the Board.
- \$4,536.35 in campaign expenditures, representing thirty-three (33) transactions, were not reported on campaign finance reports filed with the Board.
- \$725.21 in campaign funds were used to pay for expenses, representing eleven (11) transactions, that could not be validated as expenses related to the campaign.
- \$1,092.00 in Accounts Payable debt was not disclosed on a campaign finance report filed with the Board.
- A copy of the 2022 campaign bank account statement was not submitted by Douglas.

#### **Auditee Response:**

No response

#### Action:

Referral to the Office of Attorney General