



Management Letter

On the Financial Statements Audit of the Governance Commission (GC)

For the period July 1, 2016 to June 30 2017



Promoting Accountability of Public Resources

**P. Garswa Jackson Sr., FCCA, CFIP, CFC
Auditor General, R.L.**

Monrovia, Liberia

December 2023

TABLE OF CONTENTS

1	DETAILED FINDINGS AND RECOMMENDATIONS.....	6
1.1	Financial Issues	6
1.1.1	Unapproved Financial Statements.....	6
1.1.2	Unsystematic Structure of Notes to the Financial Statements	6
1.1.3	Discrepancy between the MFDP Fiscal Outturn Report and Financial Statements	8
1.1.4	Unauthorized Bank Signatories.....	9
1.1.5	Non-Performance of Bank Reconciliation Statements	10
1.1.6	Non- Deduction and Remittance of Social Security Contributions	11
1.1.7	Non-remittance of Income Taxes.....	12
1.1.8	Payments without Supporting Documentation	14
1.1.9	Irregularities associated with Communication Cards and Fuel	15
1.1.10	Employees on the Payroll but not on Personnel List	17
1.2	Compliance Issues	18
1.2.1	Irregularities Associated with Fixed Asset Management.....	18
1.2.2	Inadequate Records in Personnel Files.....	20
1.2.3	Employees' unapproved absences	21
1.2.4	Employee due for Retirement.....	23
1.2.5	No Evidence of Budget Committee	24
1.3	Governance Issues.....	25
1.3.1	Audit Committee	25
1.3.2	IT Strategic Plan	25
1.3.3	IT Security Policy	26
1.3.4	Threat to Business Continuity	27
2	ANNEXURES.....	29

ACRONYMS USED

Acronyms/Abbreviations/Symbol	Meaning
AFP	Audit Focal Person
AG	Auditor General
CFC	Certified Financial Consultant
CFIP	Certified Financial Investigation Professional
ED	Executive Director
FCCA	Fellow Chartered Certified Accountant
F/S	Financial Statements
GC	Governance Commission
GoL	Government of Liberia
IFMIS	Integrated Financial Management Information System
IFR	Interim Financial Reports
INTOSAI	International Organization of Supreme Audit Institutions
IPSAS	International Public Sector Accounting Standards
ISSAI	International Standards of Supreme Audit Institutions
No.	Number
N/A	Not Applicable
QPR	Quarterly Progress Report
Qty	Quantity
SOE	Statement of Expenditures
ToR	Term of Reference
USD	United States Dollars

December 1 2023

Hon. Garrison Yealue

Chairman

Governance Commission

9th Street, Sinkor

Monrovia, Liberia

Dear Hon. Yealue:

Re: Management Letter on the Financial Statement Audit of the Governance Commission (GC) for the Fiscal Period July 1, 2016 to June 30, 2017

Introduction

The Financial Statements of the Governance Commission (GC) are subject to audit by the Auditor-General (AG) consistent with the Auditor General's mandate as provided for in Section 2.1.3 of the GAC Act of 2014 as well as the Audit Engagement Terms of Reference (ToR).

The audit of the Governance Commission (GC) for the fiscal period July 1, 2016 to June 30, 2017 was completed and the purpose of this letter is to bring to your attention the findings that were revealed during the conduct of the audit.

Scope and Determination of Responsibility

The audit was conducted in accordance with the International Standards of Supreme Audit Institutions (ISSAIs). These standards require that the audit is planned and performed so as to obtain reasonable assurance that, in all material respects, fair presentation is achieved in the annual financial statements.

An audit includes:

- Examination on a test basis of evidence supporting the amounts and disclosures in the financial statements;
- Assessment of the accounting principles used and significant estimates made by management; and
- Evaluation of the overall financial statement presentation.

An audit also includes an examination, on a test basis, of evidence supporting compliance in all material respects with the relevant laws and regulations which came to our attention and are applicable to financial matters.

The matters mentioned in this letter are therefore those that were identified through tests considered necessary for the purpose of the audit and it is possible that there might be other matters and/or weaknesses that were not identified.

The financial statements, maintenance of effective control measures and compliance with laws and regulations are the responsibility of the Governance Commission. Our responsibility is to express our opinion on these financial statements.

Key Management Personnel

No	Title/Position Held	Name	Period of Service
1.	Chairman	Amos C. Sawyer	2017/2018
2.	Vice Chair-Person	Elizabeth Sele Mulbah	2017/2018
3.	Commissioner	Yarsuo Weh-Dorliae	2017/2018
4.	Commissioner	Othello Gongar	2017/2018
5.	Commissioner	Wesley M. Johnson	2017/2018
6.	Executive Director	Stephen S. Manley	2017/2018
8.	Human Resource Director	Maima M. Roberts	2017/2018
9.	Grant Portfolio Director	Catherine H. Karmo	2017/2018
10.	Procurement Director	Quoquoi Z. Gayflor	2017/2018
11.	Finance Manager	Kollie A. Dorko	2017/2018
12.	Finance Officer II	Emmanuel Rennie	2017/2018

Appreciation

We would like to express our appreciation for the courtesy extended and assistance rendered by the staff of the Governance Commission (GC) during the conduct of the audit.

P. Garswa Jackson, Sr. FCCA, CFIP, CFC
Auditor General, R.L.

Monrovia, Liberia

December 2023

1 DETAILED FINDINGS AND RECOMMENDATIONS

1.1 Financial Issues

1.1.1 Unapproved Financial Statements

Observation

- 1.1.1.1 Paragraph 2.3.0 of the IPSAS cash basis of accounting as adopted by the GOL in 2009 requires "An entity should disclose the date when the financial statements were authorized for issue and who gave that authorization. If another body has the power to amend the financial statements after issuance, the entity should disclose that fact."

- 1.1.1.2 During the audit, we observed that the Management did not take responsibility of the financial statements by signing or approving the statements before issuance for audit.

Risk

- 1.1.1.3 The failure of Management to prepare and present approved financial statements may deny financial statements users of relevant information important for decision making and management may not fully account for the activities of the entity

Recommendation

- 1.1.1.4 Management should ensure that financial statements prepared are signed and/or approved by the designated authorities.

Management's Response

1.1.2 Unsystematic Structure of Notes to the Financial Statements

Observation

- 1.1.2.1 Paragraph 1.5.1 (b) of the Cash Basis IPSAS as adopted by the Government of Liberia in 2009 requires the notes to the financial statements of an entity to provide additional information which is not presented on the face of the financial statements but is necessary for a fair presentation of the entity's cash receipts, cash payments and cash balances. Notes to the financial statements should be presented in a systematic manner.

- 1.1.2.2 During the audit, we observed that the notes to the financial statements were not presented in a systematic manner as prescribed by the Standards. **See table 1 below for details.**

Table 1: Unsystematic Structure of Notes to the Financial Statements

Notes to the financial statement prepared by GC	As Provided for by IPSAS (See Appendix 2 (1-10))
1.General Information	1.General Information and Accounting policies
2.Accounting policies	2.Cash
3. Authorization date	3.Borrowings

Notes to the financial statement prepared by GC	As Provided for by IPSAS (See Appendix 2 (1-10))
4. Authorized Allocations/Appropriation	4.Other Receipts
5. Other Receipts	5.Other Payments/ Expenditure
6. Payment -Operations	6.Undrawn borrowing facilities other than undrawn external assistance
7. External assistance	7.Significant controlled entities
8. Cash and Cash Equivalents	8.Authorization date
9. Original and Final Approved Budget and Comparison of Actual and Budget Amount	9.Original and final approved budget and comparison of actual and budget amount
10. External assistance Payment by other Governance Units and third Parties	10.External assistance

Risk

- 1.1.2.3 Unsystematic presentation of notes to the financial statements may impair fair presentation, full disclosure and decision making of the users of the financial statements.

Recommendation

- 1.1.2.4 Management should ensure full and systematic disclosure in the notes to the financial statements as required by the standards.
- 1.1.2.5 Financial statements prepared by a junior staff should be reviewed and approved by a senior staff with the relevant qualification, experience and seniority.

Management's Response

- 1.1.2.6 *The "Unsystematic Presentation" of notes is not the making of the Commission. The MFDP every fiscal period provides template/format to ministries agencies, and commissions (MACs) for reporting purposes and MACs are obliged to use the approved template/format developed by MFDP. Additionally, not every note is applicable to a specific entity.*

Auditor General's Position

- 1.1.2.7 Management's assertion did not adequately address the issue raised. Paragraph 1.5.1 (b) of the Cash Basis IPSAS as adopted by the Government of Liberia in 2009 requires the notes to the financial statements of an entity to provide additional information which is not presented on the face of the financial statements but is necessary for a fair presentation of the entity's cash receipts, cash payments and cash balances. Notes to the financial statements should be presented in a systematic manner.
- 1.1.2.8 Further, Regulations A.3 (1) of the PFM Act of 2009 states that "Any public officer concerned with the conduct of financial matters of the Government of Liberia, or the

receipt, custody and disbursement of public and trust moneys, or for the custody, care and use of government stores and inventories shall keep books of accounts and proper records of all transactions and shall produce the books of the transactions for inspection when called upon to do so by the Auditor General, the Comptroller General, the relevant internal auditor or any officers authorized by them". Therefore, the preparation of adequate financial statements is the responsibility of Management and not the MFDP. We therefore maintain our findings and recommendations. We will follow up on the implementation of our recommendations during subsequent audit.

1.1.3 Discrepancy between the MFDP Fiscal Outturn Report and Financial Statements

Observation

1.1.3.1 Regulation C. 8 (2) of the PFM Act of 2009, states that "A head of agency or spending unit shall have overall responsibility and accountability for the collection and receipt of all revenues or the financial administration of the monies voted by Legislature for, or applied by statute to, the services under the control of his or her ministry or agency".

1.1.3.2 During the audit, we observed that the actual amount disbursed to Governance Commission (GC) as recorded in the MFDP Fiscal Outturn Report was US\$1,749,334.00 whereas, in the financial statements, Management reported the total amount of US\$1,766,149.90 as total amount received. This resulted in a variance of US\$16,815.90.

See table 2 below.

Table 2: Discrepancy between the MFDP Fiscal Outturn Report and Financial

Amount disbursed as per Fiscal Outturn Report US\$ (A)	Amount Reported as Receipts by the GC Financial Statements US\$ (B)	Variance US\$ (C=A-B)
1,749,334.00	1,766,149.90	16,815.90

Risk

1.1.3.3 The completeness and accuracy of expenditures may not be assured. Therefore, the financial statements may be misstated.

1.1.3.4 Management may not account for all its transactions and expenditures may be understated.

Recommendation

1.1.3.5 Management should account for the difference between the fiscal outturn report and the financial statements and where applicable adjust the financial statements accordingly.

1.1.3.6 Going forward, Management should conduct periodic (monthly) reconciliation between the fiscal outturn report and the expenditure report. Variances identified should be documented, investigated and adjusted where applicable.

- 1.1.3.7 Financial statements and expenditure reports prepared by a junior staff should be reviewed and approved by a senior staff with the relevant qualification, experience and seniority.

Management's Response

- 1.1.3.8 *The Commission stands by the figure of US\$1,766,149.90 reported in its Financial Statement as to its completeness and accuracy. In addition to money received under the fiscal year budget 2016/2017, the Commission also received money for goods and services from the fiscal year budget 2015/2016 in the audited period of fiscal year 2016/2017. The Commission can't however speak to the authenticity, accuracy and completeness of the figure in the fiscal outturn since the outturn was never generated and prepared by the Commission. The spreadsheet containing the total receipts reported in the financial statements will be made available in substantiation of the US\$1,766,149.90*

Auditor General's Position

- 1.1.3.9 We acknowledge Management's assertion. However, the fiscal Outturn report generated from the IFMIS, GoL financial reporting system, should reconcile with the entity's financial statements to ascertain the completeness and accuracy of receipts/revenue. Therefore, we maintain our finding and recommendations. We will follow-up on the implementation of our recommendations during subsequent audit.

1.1.4 Unauthorized Bank Signatories

Observation

- 1.1.4.1 Page 26, Paragraph 6, of the Financial Management Policies and procedures Manual of March 2013 states "All GC checks will require two signatures. There will be two groups of signatories and any member of a group may sign for that group. One member from each group must sign each check. The first group will consist of the Chairman of the Governance Commission and the Executive Director, the second group will consist of the Finance Manager and the Finance Officer. Under no circumstances will the cashier be granted signatory authority".
- 1.1.4.2 During the audit, we observed that transactions amounting to US\$890.00 and L\$1,469,570.27 were expended for the payment of various goods and services without the required authorized signatories. **See Annexure 1 for details.**

Risk

- 1.1.4.3 Unauthorized signatories for transactions may facilitate unauthorized access to the entity's funds and other fraudulent financial practices.

Recommendation

- 1.1.4.4 Management should provide substantive justification for facilitating unauthorized signatures for approval of expenditure.
- 1.1.4.5 Management should request their bankers to provide authorized signatories for all its accounts, review the legitimacy of each signatory consistent with policy and adjust the signatories accordingly.

- 1.1.4.6 Going forward Management should ensure that all check payments are approved by the relevant authorities.

Management's Response

- 1.1.4.7 *All the commissioners at the commission are authorized signatories to all of the commission's accounts. The policy granting the authorization will be made available.*
- 1.1.4.8 *Additionally, section A9(3) of the PFM Regulations provides "Heads of government agencies shall formally, and in writing transmit authentic signatures of all authorized officers under their supervision to the Minister at the beginning of each fiscal year or at any other time, during the year, when there is change in authorized personnel. If a public officer no longer occupies a public office, his signature specimen should be nullified and a communication of the nullification sent to the Minister within 24 hours". This indicates that the Chairman's at the time was in the know by the signing of the signature cards for other commissioners to make them authorized signatories. Therefore, all expenditure processed under the signatories of those commissioners were authorized.*

Auditor General's Position

- 1.1.4.9 Management's assertion did not adequately address the issue raised. Page 26, Paragraph 6, of the Financial Management Policies and procedures Manual of March 2013 states "All GC checks will require two signatures. There will be two groups of signatories and any member of a group may sign for that group. One member from each group must sign each check. The first group will consist of the Chairman of the Governance Commission and the Executive Director, the second group will consist of the Finance Manager and the Finance Officer." However, the transactions identified in annexure 1 were approved by members of the board of commissioners' contrary to the regulations quoted above. Therefore, we maintain our finding and recommendations. We will follow up on the implementation of our recommendations during subsequent audit.

1.1.5 Non-Performance of Bank Reconciliation Statements

Observation

- 1.1.5.1 Regulation R.3 (6) of the PFM Act of 2009 states that, "The Balance of every bank account as shown in a bank statement shall be reconciled with the corresponding cashbook balance at least once every month; and the reconciliation statement shall be filed or recorded in the cash book or the reference to the date and number thereof."
- 1.1.5.2 During the audit, we observed that the bank reconciliation statements for Guaranty Trust Bank (GTB) account No. 203305161210, 203313561211 and 203313561110 were not prepared for the months of November 2016, December 2016, February 2017 through June 30, 2017. **See Table 3 and Annexures 2 for details.**

Table 3: Non-Performance of Bank Reconciliation Statements

Bank Name	Account No.	Currency	Total Amount	Amount Provided	Outstanding
GT Bank	203313561211	USD	12	1	11
GT Bank	203313561110	LRD	12	-	12
GT Bank	203313561210	USD	12	1	11
TOTAL			36	2	34

Risk

- 1.1.5.3 Failure to prepare bank reconciliation statements may lead to untimely detection of errors or omissions and fraud. Management may not fully account for its transactions.

Recommendation

- 1.1.5.4 Management should ensure that monthly bank reconciliation reports are prepared for each operational and designated account established by the entity.
- 1.1.5.5 Monthly bank reconciliation statements should be prepared and approved by staff with the relevant qualification, experience and seniority.
- 1.1.5.6 Monthly bank reconciliation report should be adequately documented and filed to facilitate future review.

Management's Response

- 1.1.5.7 *The bank reconciliations for the months reported will be provided.*

Auditor General's Position

- 1.1.5.8 Management's assertion was not supported by documentary evidence. Therefore, we maintain our finding and recommendations. We will follow up on the implementation of our recommendations during subsequent audit.

1.1.6 Non- Deduction and Remittance of Social Security Contributions

Observation

- 1.1.6.1 Regulation T.9 (2) of the Public Financial Management Act of 2009 states that "A head of government agency shall ensure that deductions made from salaries are paid directly into the Consolidated Fund unless otherwise stated in the agreement covering the advance."
- 1.1.6.2 Furthermore, section 89.16(a) of the NASSCORP New Act and published February 13, 2017 states that "The contribution payable under this Act in respect of an employee shall comprise contribution payable by the employer (hereinafter referred to as the employer's contribution) and contribution payable by the employee (hereinafter referred to as the employee's contribution) and shall be paid to the Corporation. Contribution rate shall be total 10% of the total gross remuneration of each employee; 2% under the Employment Injury Scheme payable by the employer; 4% employer contribution and 4% employee contribution to be remitted by the employer".

- 1.1.6.3 During the audit, we observed that Management did not deduct and remit contributions to NASSCORP.

Risk

- 1.1.6.4 Management may be non-compliant with NASSCORP General Regulations of 2018 which may result to penalty and fines.
- 1.1.6.5 Potential retirees of GC may be denied required pension benefits due to non-compliance with the regulation.
- 1.1.6.6 The completeness and accuracy of social security contributions for employees may be misstated. This may lead to inaccurate computation of employees' social security benefits.

Recommendation

- 1.1.6.7 A payment plan should be crafted and agreed between Management and NASSCORP Management for full settlement of all arrears. Management should budget for and ensure full compliance to the terms of the agreed payment plan.
- 1.1.6.8 Management should facilitate full payment of employee's contributions to NASSCORP on a consistent and timely basis.
- 1.1.6.9 Management should ensure that a comprehensive reconciliation is performed with NASSCORP records to ensure that individual employees social security contributions are duly allocated and compiled to validate the completeness and accuracy of employees' social security contributions.
- 1.1.6.10 Going forward, monthly remittance of NASSCORP contributions should be accompanied by a listing of employees and their social security numbers for ease of allocation to employees' NASSCORP accounts respectively.

Management's Response

- 1.1.6.11 *Management did deduct and remit to NASSCORP. The documents will be provided.*

Auditor General's Position

- 1.1.6.12 Management assertion was not supported by documentary evidence. Therefore, we maintain our finding and recommendations. We will follow up on the implementation of our recommendations during subsequent audit.

1.1.7 Non-remittance of Income Taxes

Observation

- 1.1.7.1 Section 905 (J) of the Revenue Code of Liberia Act of 2000 as amended in 2011 states "within 10 days after the last day of the month, payer described in (a) is required to remit to the tax authorities the total amount required to be withheld during the month", and (m) stipulates "a person who has a withholding obligation under this section and fails to

withhold and remit the amount of tax required to be withheld is subject to Section 52 penalty for late payment and failure to pay”.

- 1.1.7.2 During the audit, we observed that Management withheld the total amount of US\$87,905.49 as taxes from staff general allowance without evidence that the taxes were subsequently remitted to the LRA. **See table 4 for details.**

Table 4: Non- Remittance of Income Taxes

Date	Description	Class	Amount US\$
07/22/2016	General Allowance withholding tax-July 2016	00 GOL Funds:01 01 Admin & Mgmt Pmts by GC	9,962.14
09/06/2016	General Allowance withholding tax-Aug 2016	00 GOL Funds:01 01 Admin & Mgmt Pmts by GC	9,974.56
09/22/2016	General Allowance withholding tax-Sept 2016	00 GOL Funds:01 01 Admin & Mgmt Pmts by GC	10,102.76
12/19/2016	General Allowance withholding taxes for December 2016	00 GOL Funds:01 01 Admin & Mgmt Pmts by GC	10,731.87
01/31/2017	General Allowance withholding tax for Jan. 2017	00 GOL Funds:01 01 Admin & Mgmt Pmts by GC	11,871.98
03/01/2017	General Allowance withholding taxes for February 2017	00 GOL Funds:01 01 Admin & Mgmt Pmts by GC	11,821.36
03/28/2017	General Allowance withholding taxes for March 2017	00 GOL Funds:01 01 Admin & Mgmt Pmts by GC	11,905.52
04/28/2017	General Allowance Withholding taxes for April 2017	00 GOL Funds:01 01 Admin & Mgmt Pmts by GC	11,535.30
TOTAL			87,905.49

Risk

- 1.1.7.3 Failure to remit taxes withheld, may deny GoL of much needed tax revenue.
- 1.1.7.4 Management may be in noncompliance with Section (905) J. of the Revenue Code of Liberia 2000, which may result in to penalties for late payment and failure to pay. Please see Section 52 of the Revenue Code of Liberia as reference above.
- 1.1.7.5 Non-remittance of withholding taxes may lead to overstatement of the cash book and subsequently the financial statements.

Recommendation

- 1.1.7.6 Management should provide substantive justification for not remitting withholding taxes on staff general allowance as provided for by the Revenue Code of Liberia.
- 1.1.7.7 Management should adjust the cash book by the total value of the non-remitted withholding taxes and restate the financial statements with the adjusted cash balance.

1.1.7.8 Going forward, Management should facilitate full remittance of withholding taxes to the LRA in keeping with Section 905 (J) of the Revenue Code of Liberia Act of 2000 as amended in 2011.

1.1.7.9 Evidence of remittance of withholding taxes should be adequately documented and filed to facilitate future review.

Management's Response

1.1.7.10 *When it comes to withholding taxes on salary, the deduction like in this case is done by MFDP. The commission received net checks for salaries after all deductions by MFDP. Therefore, it is practically and factually impossible for the commission to account for and remit withholding taxes it did not receive. The commission therefore implores the GAC to direct this query to the proper party which is the MFDP.*

Auditor General's Position

1.1.7.11 Management's assertion did not adequately address the issues raised. Management should request and retain copies of withholding taxes remitted to the LRA by MFDP on behalf of the entity to facilitate full compliance with the law. Therefore, we maintain our finding and recommendations. We will follow-up on the implementation of our recommendation during subsequent audit.

1.1.8 Payments without Supporting Documentation

Observation

1.1.8.1 Regulations P.9 (2) of the PFM Act of 2009 states that "Payments except for statutory transfers and debt service shall be supported by invoices, bills and other documents in addition to the payment vouchers".

1.1.8.2 During the audit, we observed that Management made payments amounting to US\$7,737.78 without evidence of supporting documents such as payment vouchers and invoices to validate the authenticity of the transactions. **See table 5 for details.**

Table 5: Payment without Supporting Documentation

Transaction Details			
Sln #	Transaction Date	Description	Amount
1	4/1/2017	Libtelco	2,100.00
2	8/22/2016	Esther V.Metzger USD	420.00
3	1/24/2017	Super Petroleum Co	407.13
4	7/21/2016	African Book Store	4,010.65
5	5/30/2017	Zanzan Kawah	200.00
6	6/2/2017	James Yarsiah	500.00
7	10/24/2016	Varney Kromah	100.00
TOTAL			7,737.78

Risk

- 1.1.8.3 In the absence of adequate supporting documents, the validity, occurrence and accuracy of payments may not be assured. This may lead to misappropriation of the entity's funds
- 1.1.8.4 The absence of adequate supporting documentation for transactions may also lead to fraudulent financial management practices, through the processing and disbursement of illegitimate transactions.
- 1.1.8.5 Management may override the procurement processes by completing disbursement without utilizing the required procurement processes.

Recommendation

- 1.1.8.6 Management should fully account for the expenditure made without adequate supporting documents.
- 1.1.8.7 Management should ensure that all transactions are supported by the requisite supporting documents consistent with the financial management regulations. Documentation such as contracts, invoices, goods received notes, job completion certificates, purchase orders, payment vouchers etc. should be prepared and approved for the procurement of goods and services where applicable. All relevant supporting documents should be adequately documented and filed to facilitate future review.

Management's Response

- 1.1.8.8 *All the named payments have supporting documentation and they will be provided.*

Auditor General's Position

- 1.1.8.9 Management's assertion was not supported by documentary evidence. Therefore, we maintain our findings and recommendations. We will follow up on the implementation of our recommendations during subsequent audit.

1.1.9 Irregularities associated with Communication Cards and Fuel

Observation

- 1.1.9.1 Section 46 (1 and 3) of the Amended and Restated Public Procurement & Concession Commission Act of 2010 states that, "(1) Public procurement shall be undertaken by means of advertised open bid proceedings, to which equal access shall be provided to all eligible and qualified bidders without discrimination, subject only to the exceptions provided under this Part for particular methods of procurement. (3) Procuring Entities may use only those methods of procurement authorized by this Act. If a Procuring Entity uses a method of procurement other than advertised open competitive bidding, it shall note in the record of the procurement proceedings the grounds for the choice of the procurement method."
- 1.1.9.2 During the audit, we observed the following irregularities associated with the management of fuel and communication cards of the entity:
- we observed no evidence of an approved fuel consumption policy to regulate the

- distribution and reporting of fuel.
- We observed that Management made multiple payments for the procurement of communication cards, fuel and lubricant in the amount of US\$19,934.24 without evidence of an Open Competitive Bidding Process. **See table 6 for details.**
- Also, there was no evidence of Procurement Committee report, bid evaluation report and contract agreement between Management and the vendors for the procurement of fuel and lubricant.

Table 6: Irregularities associated with Fuel and Lubricant

Date	Name	Memo	Amount
1/24/2017	Super Petroleum Co	cost of fuel for vehicles	407.13
11/25/2016	Super Petroleum Co LRD	cost of fuel for vehicles	1,784.87
5/9/2017	Super Petroleum Co LRD	cost of fuel for generator	941.49
10/19/2016	Super Petroleum Co	cost of fuel for vehicles	2,183.15
10/24/2016	Varney Kromah	cost of purchase of communication cards	100
6/22/2017	Young Shall Business Center	cost of communication cards	7,050.00
7/25/2016	Harbel supermarket	cost of staff allotment for scratch cards	3,013.50
7/7/2016	Harbel supermarket	cost of communication cards	4,454.10
TOTAL			19,934.24

Risk

- 1.1.9.3 Fuel and communication cards procured may not be based on actual consumption.
- 1.1.9.4 Management may spend above budgeted allocation and fuel and communication cards may be subjected to misappropriation or theft.
- 1.1.9.5 Non-adherence to the PPC Act may impair competitive procurement process and value for money may not be achieved.

Recommendation

- 1.1.9.6 Management should provide material justification for procuring fuel and communication cards without evidence of an open and competitive bidding process.
- 1.1.9.7 Management should provide contract agreement and all relevant supporting documents with the vendors.
- 1.1.9.8 Going forward, Management should adhere to the amended and restated PPC Act of 2010, specifically section 41 (1 and 3) for all procurement transactions to facilitate competitive selection of vendors and enhance the achievement of value for money.
- 1.1.9.9 Management should develop, approve and operationalize a policy on fuel and communication cards distribution, consumption, purchase and ensure that proper records are maintained.

- 1.1.9.10 Management should maintain a fuel and communication cards consumption and distribution log to aid the entity manage cost and inform future purchase. These documents should be adequately filed to facilitate future review.

Management's Response

- 1.1.9.11 *Management did adhere to the Amended and Restated PPCC Act (Section 41, subsection 1 &3) in the procurement of communication cards and fuel. Supporting documents will be provided in substantiation of Management's assertion. Fuel consumption and distribution logs will be provided.*

Auditor General's Position

- 1.1.9.12 Management's assertion was not supported by documentary evidence. Therefore, we maintain our findings and recommendations. We will follow up on the implementation of our recommendations during subsequent audit.

1.1.10 Employees on the Payroll but not on Personnel List

Observation

- 1.1.10.1 Regulations T.3 of the PFM Act of 2009 states that (1)" The head of every Management Unit shall keep records of all Personnel Emolument of staff employed in his management unit, to ensure that: (a) payments are made as and when due; (b) overpayments are not made; (c) all required deductions are made at the correct time; (d) authorized establishments or manpower ceilings are not exceeded; (e) the amount of salary and other allowances authorized for payment to each staff is not exceeded; and (f) payments are not made on the payment voucher to staff who do not belong to the Agency or unit.
- 1.1.10.2 During the audit, we observed that in August 2016, Management paid salaries amounting to L\$147,634.64 and US\$6,213.41 to nine (9) individuals whose names were not on the approved Personnel Listing. **See table 7 for details.**

Table 7: Employees on the Payroll but not on Personnel List

No	Last Name	Frist Name	Position	Amount-L\$	Amount-US\$	Months Paid for 2016/2017
1.	Foko	Tamba	Chauffeur	6,476.52	259.06	August 2016
2.	Joe	Howard	Chauffeur	6,476.52	259.06	August 2016
3.	Evan	Delah	Chauffeur	6,476.52	259.06	August 2016
4.	Sonnie	Alex	Chauffeur	6,476.52	259.06	August 2016
5.	Porte	Boima	Chauffeur	6,476.52	259.06	August 2016
6.	Gray	Vian	Chauffeur	6,476.52	259.06	August 2016
7.	Dickson	Hallah	Chauffeur	6,476.52	259.06	August 2016
8.	B. Mathew	Kollie	Program Manager	65,100.00	2,800.00	August 2016
9.	M. Marwolo	Lewis	Methodologist	37,199.00	1,599.99	August 2016
TOTAL				147,634.64	6,213.41	

Risk

- 1.1.10.3 Illegitimate individuals (Ghosts employees) may be included on the payroll.
- 1.1.10.4 Payments may be made for work not performed.
- 1.1.10.5 Personnel expenditure and subsequently the financial statements may be misstated.

Recommendation

- 1.1.10.6 Management should reconcile the payroll journals to the personnel listing on a monthly basis. Difference(s) identified should be documented, investigated and where applicable adjusted in a timely manner.
- 1.1.10.7 Management should ensure that payroll vouchers are review on a monthly basis by senior management and the monitoring arm of management (Management Internal Controls Department) to mitigate errors and/or irregularities.
- 1.1.10.8 Management should ensure that Personnel records and the payroll are updated to contain all employees in the entity to enable Administration regulate the activities of its personnel effectively.

Management's Response

- 1.1.10.9 *These employees are bona fide employees of the Commission and their names are on the personnel Listing. The Personnel Listing for the audited period will be provided.*

Auditor General's Position

- 1.1.10.10 Management's assertion was not supported by documentary evidence. Therefore, we maintain our findings and recommendations. We will follow up on the implementation of our recommendations during subsequent audit.

1.2 Compliance Issues

1.2.1 Irregularities Associated with Fixed Asset Management

- 1.2.1.1 Regulations V.4 (2) of the PFM Act of 2009 and revised in 2019 states that, "The master inventory shall record under each category of item:
 - the date and other details of the voucher or other document on which the items were received or issued;
 - their serial numbers where appropriate; and
 - their distribution to individual locations and the total quantity held."
- 1.2.1.2 During the audit, we observed the following irregularities associated with the fixed assets management system of the entity:
 - No fixed asset policy,
 - The Fixed Assets Register was not updated,

- The fixed assets register did not contain all the relevant columns,
- There was no evidence of movement of assets form,
- Several of the entity's fixed assets were not coded,
- There was no evidence of periodic physical verification of fixed assets
- Fixed assets within a given vicinity were not displayed as required by the PFM Act.

Risk

- 1.2.1.3 Fixed Assets Register may be misstated (Over/understated).
- 1.2.1.4 Assets may be damaged or impaired, but their values are still on the books.
- 1.2.1.5 Fixed assets may be removed from the entity's premises without authorization, misappropriated, subjected to personal use or theft.
- 1.2.1.6 The lack of asset movement log may make it difficult to keep track of assigned or transferred assets, which may lead to misuse, loss or theft of assets without being noticed.
- 1.2.1.7 Failure to properly account for fixed assets may lead to theft and misapplication of equipment/materials. This may result in the non-achievement of the entity objectives.
- 1.2.1.8 Fixed Assets not coded may be susceptible to theft or diverted to personal use.

Recommendation

- 1.2.1.9 Management should ensure that all assets value is recorded and maintained in the register.
- 1.2.1.10 Management should ensure that the fixed assets register is updated to reflect the following; description, source of purchase, date of purchase, class, code, assignee, location, condition, original cost, depreciation expense, accumulated depreciation and net book value of the asset.
- 1.2.1.11 Management should conduct periodic fixed assets count and /or verification to determine the current condition and location of the assets. Evidence of physical verification should be adequately documented and filed to facilitate future review.
- 1.2.1.12 The Fixed Assets Register should be updated periodically to reflect all the entity's assets.
- 1.2.1.13 Fixed assets within a particular vicinity should be clearly displayed as required by the PFM Act.
- 1.2.1.14 Management should initiate/enforce a systematic fixed assets coding system to ensure all fixed assets are uniquely identified. This control will facilitate the efficient and effective periodic fixed asset verification exercises. Discrepancies in coding identified during verification should be updated in a timely manner.

- 1.2.1.15 A Movement of Asset Form should be filled and authorized before assets are moved from one location to another. The Fixed Asset Register should be updated to reflect the change in location of asset.

Management's Response

- 1.2.1.16 *Management did not respond to this finding.*

Auditor General's Position

- 1.2.1.17 In the absence of a response by Management, we maintain our findings and recommendations. We will follow up on the implementation of our recommendations during subsequent audit.

1.2.2 Inadequate Records in Personnel Files

Observation

- 1.2.2.1 Chapter 5.8 of the CSA Standing Order of 2012 states that "the below listed documents make up the employee's file and must remain in the file as part of the employee's records:
- a. Employment Letter
 - b. Resume;
 - c. Credentials;
 - d. Personal data;
 - e. Job description;
 - f. All subsequent warnings or commendation; and
 - g. Annual appraisal forms and related evaluation forms

- 1.2.2.2 During the audit, we observed that Management did not maintain essential personnel records such as; Birth certificate, Medical Examination Certificates, Police Clearance, and Recommendations.

Risk

- 1.2.2.3 Failure to maintain essential personnel records may lead to Management inability to manage or regulate the activities of its personnel effectively.
- 1.2.2.4 Management may recruit employee who may not have the relevant qualification and experience.
- 1.2.2.5 Illegitimate individuals (Ghosts employees) may be included on the payroll.

Recommendation

- 1.2.2.6 Management should ensure that all employees' files are updated to contain essential documents such as letter of applications, letter of employment, contracts, credentials, Personnel Action Notice (PAN), etc. to enable Administration regulate the activities of its personnel effectively.

- 1.2.2.7 Going forward, Management should perform periodic review of personnel files for all employees. Gaps identified should be regularized in a timely manner.

Management's Response

- 1.2.2.8 *Management did not respond to this finding.*

Auditor General's Position

- 1.2.2.9 In the absence of a response by Management, we maintain our findings and recommendations. We will follow up on the implementation of our recommendations during subsequent audit.

1.2.3 Employees' unapproved absences

Observation

- 1.2.3.1 Regulation T.5 of the PFM Act of 2009 states that "A Head of government agency shall cause the immediate stoppage of payment of salary to a public servant when that public servant has:
- been absent from duty without permission or reasonable cause for a period as stipulated in the administrative regulations of the establishment; been absent from duty on leave without pay;
 - been convicted of an offence involving theft or fraud, or a sentence of imprisonment;
 - resigned;
 - retired; or
 - died.
- 1.2.3.2 Also, Section 12.2 of the Governance Commission Employees Handbook Adopted April 24, 2014 states "As a means of making sure that there is a full complement of employees to conduct its business, it is anticipated that all employees report to work on time as scheduled. Notwithstanding, both anticipated and inexcusable lateness, and or absence will occur occasionally. In case of unanticipated lateness, or absence, the employee should communicate with his/her supervisor and the HR within the first hour of the work day. When the absence or lateness is anticipated, an advance notice must be given. Three unexcused lateness, equal one day absent. Three unexcused days absent is case for disciplinary action and including salary deduction or discharge. Accumulated excuse days absent will be deducted from employee annual leave days".
- 1.2.3.3 During the audit, we observed that there was no evidence of formal excuses from some employees for being absent from work nor was there evidence of reprimand from Management for failing to report to work. **See table 8, for details.**

Table 8: Employees' unapproved absences

Month/Year	Names	Num. of Days Absent	Num. of days not sign in and out
Aug-2016	Danroy J. Dixon	Nine (9) Days Absent	Nine (9) days Aug. 1 -9
Aug-2016	Richard Troh	Two (2) days absent	Ten (10) days Aug. 2 - 19

Month/Year	Names	Num. of Days Absent	Num. of days not sign in and out
Aug-2016	J. Diana More	Two (2) days absent	sixteen (16) days Aug. 2 -31
Aug-2016	G. Momolu Pewu	One (1) day absent	Eight (8) Aug. 10 -31
Nov-2016	Mamuna m. Kamara	Eight (8) days	Travel 1 -31 no document
Nov-2016	Abeh Glaysuah	Twenty (20) days	Nov. 1 – 30
Nov-2016	Parker Johnson	Three (3) days	seven (7) days Nov. 4 -7, 8-8, 11-14-23
Nov-2016	Christopher S. Sayery	Eighteen (18) days	2nd – 30
Sept. 2017	J. Diana Moore	Eight (8) days	1-4-5-6-7-8-11-13-14-15-18-19-20
Sept. 2017	Armah Risks	Twelve (12) days	2-5-6-8-11-2-13-14-15
Sept. 2017	Esther V. Metzger	Seven (7) days	18-19-20-21-25-27-28
Sept. 2017	Varney Kromah	Eight (8) days	11-12-13-14-15-18-19-20-28
Aug. 2017	Gebah M.S Doteh	Fourteen (14) days	On leave no document to that effect
Aug. 2017	Cecelia Flomo	Fifteen (15) days	On leave no document to that effect
Aug. 2017	Wesseh Netugba	Thirteen (13) days	Traveled no document to that effect
Aug. 2017	Judith W. Baysah	Seventeen (17) days	Did not sign in and out 1 - 31

Risk

- 1.2.3.4 Failure to monitor and supervise personnel attendance records may result to compensation of non-deserving employees. This practice may cultivate an inappropriate work culture at the entity and may subsequently affect the operation and performance of the entity.

Recommendation

- 1.2.3.5 Management should ensure that personnel attendance records are regularly monitored by a designated staff and that employees should be reprimanded in line with the entity's employees' handbook for failing to report to work.
- 1.2.3.6 Management should perform periodic spot check of personnel attendance records to ascertain the effectiveness of the control.
- 1.2.3.7 Evidence of daily attendance records, periodic spot checks and actions taken for unauthorized absences should be adequately documented and filed to facilitate future review.

Management's Response

- 1.2.3.8 *Management did not respond to this finding.*

Auditor General's Position

- 1.2.3.9 In the absence of a response by Management, we maintain our findings and recommendations. We will follow up on the implementation of our recommendations during subsequent audit.

1.2.4 Employee due for Retirement

Observation

- 1.2.4.1 Chapter 26, Section 2501 of the Labor Law of Liberia states "An employee within the application of this chapter is entitled to receive from his employer retirement pension on retirement from the undertaking at the age of 60 and if such employee has completed at least fifteen years of continuous service, or he may retire at any age after he has completed twenty-five years of continuous service in such undertaking.
- 1.2.4.2 The amount of pension paid annually to an employee shall be at least forty percent of the average monthly earnings for the last five years immediately preceding his retirement. One-twelfth of such amount shall be paid each month from the time of retirement until the death of the employee".
- 1.2.4.3 During the audit, we observed that a staff had met the requirements for retirement but was still employed with the institution. ***See Table 9 for details.***

Table 9: Employee for Retirement

No	Last Name	Frist Name	Department	Sex	Date of Employment	Date Of Birth
1.	Troh	Richard Saywon	Janitorial Supervisor	Male	5-Dec-2005	29-Oct-1953

Risk

- 1.2.4.4 Employees may have exceeded the required age limit of active employment thereby impairing productivity and efficiency in government operations.
- 1.2.4.5 Failure of the system to trigger over-age personnel may lead to over-age employees being on active assignment which may subsequently lower productivity in the public service.

Recommendation

- 1.2.4.6 Management should ensure that over-aged employees are honorably retired/pensioned in line with the relevant laws and regulations.
- 1.2.4.7 Management should ensure that a trigger is activated in the age column or field of the payroll database to prompt end-users of over-aged employees.
- 1.2.4.8 Management should conduct routine data integrity check and perform periodic systems updates to identify irregularities relative to over-aged employees. Discrepancies identified should be reported and investigated in a timely manner.

Management's Response

- 1.2.4.9 *Management did not respond to this finding.*

Auditor General's Position

- 1.2.4.10 In the absence of a response by Management, we maintain our findings and recommendations. We will follow up on the implementation of our recommendations during subsequent audit.

1.2.5 No Evidence of Budget Committee

Observation

- 1.2.5.1 Regulation D.16.1 of the PFM Act of 2009 states "Every head of government agency shall establish a Budget Committee which shall be responsible for budget formulation.
- 1.2.5.2 implementation, monitoring and evaluation made up of (a) the head of government agency, who shall be the chairperson; and (b) Heads of budget management centers or cost centers)".
- 1.2.5.3 During the audit, we observed that Management operated without evidence of an established budget committee as required by the PFM Act of 2009.

Risk

- 1.2.5.4 In the absence of an established budget committee, management may experience delay during the preparation of the institution's budget formulation, implementation, and monitoring.

Recommendation

- 1.2.5.5 Management should establish a Budget Committee responsible for budget formulation, implementation and the monitoring of the entity's activities. This would ensure management's compliance with Section D.16.1 (a) and (b), of the PFM Regulations of 2009.
- 1.2.5.6 The Budget Committee should be made functional evidence by the documentation of meeting minutes and periodic reports.

Management's Response

- 1.2.5.7 *Evidence will be provided to show the establishment of the Budget Committee*

Auditor General's Position

- 1.2.5.8 Management's assertion was not supported by documentary evidence. Therefore, we maintain our findings and recommendations. We will follow up on the implementation of our recommendations during subsequent audit.

1.3 Governance Issues

1.3.1 Audit Committee

Observation

- 1.3.1.1 Section 1(K.10) of the Public Financial Management Regulations of 2009 states "A Head of government agency or government organization shall in consultation with the Internal Audit Governance Board establish and maintain an audit committee for the government agency or organization for which he/she is responsible."

- 1.3.1.2 During the audit, we observed no evidence of an audit committee established at the GC.

Risk

- 1.3.1.3 Management failure to establish a functional audit committee may prevent Management from taking timely corrective action on deficiencies identified by the Internal Audit Unit and the recommendations of the General Auditing Commission.

Recommendation

- 1.3.1.4 Management should establish a functional audit committee as part of the Governance structure of the entity. This will enable Management to evaluate and ensure that internal controls are operating effectively and the recommendations of internal and external auditors are implemented.
- 1.3.1.5 Management should ensure that the audit committee is made fully functional evidence by the documentation of meeting minutes and periodic reports.

Management's Response

- 1.3.1.6 *Management did not respond to this finding.*

Auditor General's Position

- 1.3.1.7 In the absence of a response by Management, we maintain our findings and recommendations. We will follow up on the implementation of our recommendations during subsequent audit.

1.3.2 IT Strategic Plan

Observation

- 1.3.2.1 Control Objectives for Information and Related Technologies (COBIT) 5-APO02 requires an entity to create a strategic plan that defines, in co-operation with relevant stakeholders, how IT- related goals will contribute to the enterprise's strategic goals. Include how IT will support IT- enabled investment programs, business processes, IT services and IT assets. Direct IT to define the initiatives that will be required to close the gaps, the sourcing strategy, and the measurements to be used to monitor achievement of goals, then prioritize the initiatives and combine them in a high-level road map.

1.3.2.2 During the audit, we observed that Management has not developed an IT Strategic Plan.

Risk

1.3.2.3 The absence of an IT Strategic Plan may result in the acquisition and use of unsuitable ICT equipment and services.

1.3.2.4 Management may be unable to identify ICT gaps associated with the systems.

Recommendation

1.3.2.5 Management should develop approve and operationalize an IT Strategic Plan to support investment programs, business processes, IT services and IT assets.

1.3.2.6 Evidence of approved IT Strategic Plan should be adequately documented and filed to facilitate future review.

Management's Response

1.3.2.7 *Management did not respond to this finding.*

Auditor General's Position

1.3.2.8 In the absence of a response by Management, we maintain our finding and recommendations. We will follow up on the implementation of our recommendations during subsequent audit.

1.3.3 IT Security Policy

Observation

1.3.3.1 In terms of COBIT 4.1 DS5 in ensuring System Security an organization need to maintain the integrity of information and protect IT assets requires a security management process. This process includes establishing and maintaining IT security roles and responsibilities, policies, standards, and procedures. Security management also includes performing security monitoring and periodic testing and implementing corrective actions for identified security weaknesses or incidents. Effective security management protects all IT assets to minimize the business impact of security vulnerabilities and incidents.

1.3.3.2 Furthermore, A.14 of the PFM Regulations, all Public Sector computerized electronic records and systems shall be consistent with an approved integrated financial management automated system consistent with the (IT) Security Policy issued by the Management. The IT Security Policy defines that each user of a computerized accounting, records, inventories, assets, human resource management, payroll or any similar system must be given a user identification number (User ID) and a password or personal identification number (PIN) by the system administrator.

1.3.3.3 During the audit, we observed no evidence of an approved IT security policy. It was established that Management had a draft or unapproved IT security policy.

Risk

- 1.3.3.4 The lack of an approved IT security policy may impair the achievement of the entity business and ICT objectives.

Recommendation

- 1.3.3.5 Management should approve and operationalize the Draft ICT security policy to mitigate ICT security related risks to enhance the organization objectives.
- 1.3.3.6 Evidence of approved ICT Security Policy should be adequately documented and filed to facilitate future review.

Management's Response

- 1.3.3.7 *Management did not respond to this finding.*

Auditor General's Position

- 1.3.3.8 In the absence of a response by Management, we maintain our finding and recommendations. We will follow up on the implementation of our recommendations during subsequent audit.

1.3.4 Threat to Business Continuity

Observation

- 1.3.4.1 Dss04.02 of COBIT 5 - maintain a continuity strategy, evaluate business continuity management options and choose a cost-effective and viable continuity strategy that will ensure enterprise recovery and continuity in the face of a disaster or other major incident or disruption. Business continuity management proactively improves the enterprise's resilience against operational disruptions and provides the capacity to adequately react to threats.
- 1.3.4.2 During the audit our assessment performed on the readiness of Management in case of a disruption revealed the following exceptions;
1. No evidence of a Business Continuity Plan (BCP)
 2. No evidence of a Disaster Recovery Plan or Site
 3. No evidence of a Network redundancy
- 1.3.4.3 Business Continuity Plan (BCP) and Disaster Recovery Plan (DRP) - are sets of activities that result in the ongoing preparedness for disaster that continually adapts to changes in business conditions for improvement. It describes the requirement to restore critical systems and other critical assets, whether in alternate or primary locations.
- 1.3.4.4 Disaster Recovery Plan or Site - is a location where an organization can relocate following a disaster for all critical information and information assets.
- 1.3.4.5 Network redundancy - is a process through which additional or alternate instances of network devices, equipment and communication mediums are installed within a network

infrastructure. It is a method for ensuring network availability in case of a network device or path failure and unavailability. As such, it provides a means of a network failover.

Risk

- 1.3.4.6 Failure to develop an approved business continuity plan, disaster recovery plan and network redundancy may result in loss of transactions data in situations where the impact of a disruption on critical business functions occurs.
- 1.3.4.7 Additionally, the lack of an offsite backup facility may lead to loss of service to users, loss of credibility, incomplete and inaccurate records in the event of a disaster.

Recommendations

- 1.3.4.8 Management should develop, approve and operationalize an IT continuity plan, disaster recovery plan and network redundancy as part of their risk mitigation strategy. This may minimize the impact of disruptions on critical business functions and the recovery capability of all services.
- 1.3.4.9 Additionally, Management should obtain an offsite secure location backup facility to provide disaster recovery protection that will safeguard the business and its resources from future disasters.

Management's Response

- 1.3.4.10 *Management did not respond to this finding.*

Auditor General's Position

- 1.3.4.11 In the absence of a response by Management, we maintain our findings and recommendations. We will follow up on the implementation of our recommendations during subsequent audit.

ANNEXURES

Annexures 1: Unauthorized Bank Signatories

N o.	Date	CK No.	PV NO	Name of Unauthorized Signatory	Position	Payee	Amount US\$	Amount L\$
1	1/25/2017	300236661	66	Elizabeth Sela Mulbah & E. Othello Gongar	Both Commissioner(s)	Eva Bailey Reed Enterprise	199.68	-
2	10/11/2016	300185321	29	Elizabeth Sela Mulbah & E. Othello Gongar	Both Commissioner(s)	Stephen S. Marley	117.40	-
3	6/20/2017	4000637774	107	Elizabeth Sela Mulbah & E. Othello Gongar	Both Commissioner(s)	Eva Bailey-Reed Enterprise		207,000.00
4	1/25/2017	400044232	34	Elizabeth Sela Mulbah & E. Othello Gongar	Both Commissioner(s)	Eva Bailey Reed Enterprise	-	29,952.00
5	1/20/2017	300236658	62	Elizabeth Sela Mulbah & E. Othello Gongar	Both Commissioner(s)	Saaksouk shopping center	573.65	-
6	3/1/2017	400044243	54	Elizabeth Sela Mulbah & E. Othello Gongar	Both Commissioner(s)	Auto Care Center	-	58,653.00
7	11/30/2016	400044222	19	Elizabeth Sela Mulbah & E. Othello Gongar	Both Commissioner(s)	Auto Care Center	-	106,526.00
8	5/10/2017	400063764	90	Elizabeth Sela Mulbah & E. Othello Gongar	Both Commissioner(s)	Auto Care Center	-	91,022.40
9	1/20/2017	400044228	30	Elizabeth Sela Mulbah & E. Othello Gongar	Both Commissioner(s)	T. Brother Refreg & air conditioner workshop	-	64,454.40
10	3/1/2017	400044245	56	Elizabeth Sela Mulbah & E. Othello Gongar	Both Commissioner(s)	Dannish H. yollah Business Center Inc	-	83,246.10
11	5/8/2017	400063761	87	Elizabeth Sela Mulbah & E. Othello Gongar	Both Commissioner(s)	Dannish H. yollah Business Center Inc	-	213,585.12
12	6/22/2017	400063785	118	Elizabeth Sela Mulbah & E. Othello Gongar	Both Commissioner(s)	Dannish H. yollah Business Center Inc	-	61,985.00
13	6/20/2017	400063777	110	E. Othello Gongar & Catherine Harries Carmo	Commissioner & Director Project	Dannish H. yollah Business Center Inc	-	20,894.50
14	6/20/2017	400063770	102	E. Othello Gongar &	Commissioner & Director Project	T. Brother Refreg & air		240,558.15

N o.	Date	CK No.	PV NO	Name of Unauthorized Signatory	Position	Payee	Amount US\$	Amount L\$
				Catherine Harries Carmo		conditioner workshop		
15	7/25/2017	400089155	149	E. Othello Gongar		Dannish H. yollah Business Center Inc	-	37,264.50
16	7/21/2017	400063800	147	Elizabeth Sela Mulbah & E. Othello Gongar	Both Commissioner(s)	Quantum Solutions Inc.	-	54,463.50
1	5/9/2017	400063759	85	Elizabeth Sela Mulbah & E. Othello Gongar	Both Commissioner(s)	The Exclusive Super store	-	105,300.00
2	7/21/2017	400089153	146	Elizabeth Sela Mulbah & E. Othello Gongar	Both Commissioner(s)	The Exclusive Super store	-	159,120.00
TOTAL							890.00	1,534,024.67

Annexure 2, Non -performance of Bank Reconciliation Statements

Account details			Months											
Bank Name	Account No.	Currency	July	August	September	October	November	December	January	February	March	April	May	June
GT Bank	203304887210	USD	Jul-16	Aug-16	Sep-16	Oct-16	Nov-16	Dec-16	Jan-17	Feb-17	Mar-17	Apr-17	May-17	Jun-17
GT Bank	203304887212	USD	Jul-16	Aug-16	Sep-16	Oct-16	Nov-16	Dec-16	Jan-17	Feb-17	Mar-17	Apr-17	May-17	Jun-17
GT Bank	203313561211	USD	Not available	Not available	Not available	Not available	Not available	Not available	Not available	Not available	Not available	Not available	May-17	Not available
GT Bank	203304887110	LRD	Jul-16	Aug-16	Sep-16	Oct-16	Nov-16	Dec-16	Jan-17	Feb-17	Mar-17	Apr-17	May-17	Jun-17
GT Bank	203313561110	LRD	Not available	Not available	Not available	Not available	Not available	Not available	Not available	Not available	Not available	Not available	Not available	Not available
GT Bank	203313561210	USD	Not available	Not available	Not available	Not available	Not available	Not available	Not available	Not available	Not available	Apr-17	Not available	Not available
GT Bank	203304887112	LRD	Jul-16	Aug-16	Sep-16	Oct-16	Nov-16	Dec-16	Jan-17	Feb-17	Mar-17	Apr-17	May-17	Jun-17