

# **AUDITOR GENERAL'S REPORT**



On the Compliance Audit of the Liberia Land Authority (LLA)

For the fiscal period ended June 30, 2021

**December 2022** 

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

# **Table of Contents**

1	FINDI	NGS AND RECOMMENDATIONS ON THE	10
1	.1 Fin	ancial Matters	10
	1.1.1	Irregular Monthly Bank Reconciliation	10
	1.1.2	No Approved Financial Accounting Manual	10
	1.1.3	No Petty Cash Policy	12
	1.1.4	No Human Resource Manual	13
	1.1.5	No Evidence of payments of Social Security Taxes	14
	1.1.6	No policy on Salary Advance	16
	1.1.7	Accounting for Revenue	17
	1.1.8	Procurement Irregularities	18
	1.1.9	Non-remittance of Vendor's withholding Taxes	20
	1.1.10	Failure to Retire Incidental and 80% DSA	21
	1.1.11	No Evidence of Tax Clearance and Business Registration	22
	1.1.12	Third Party Payments to Made Employee	23
	1.1.13	Transactions Without Supporting Documentations	25
	1.1.14	Irregularities Associated with Fuel Consumption	27
	1.1.15	Revenue and Expense Ledgers	28
1	.2 Coi	ntrol and Administrative Issues	29
	1.2.1	Irregularities noted with Fixed Assets	29
	1.2.2	Lack of Policies and Procedures	31
ΔΝΙ	VEXIIRE	: <b>c</b>	33

# **ACRONYMS USED**

Acronyms/Abbreviations/Symbol	Meaning					
A/C#	Account Number					
AG	Auditor General					
CFC	Certified Financial Consultant					
CFIP	Certified Forensic Investigative Professional					
COSO	Committee of Sponsoring Organizations of the					
	Treadway Commission					
DSA	Daily subsistence Allowances					
FCCA	Fellow Member of the Association of Chartered Certified					
	Accountant					
GAC	General Auditing Commission					
GoL	Government of Liberia					
GSA	General Services Agency					
IAS	International Accounting Standards					
ICB	International Competitive Bidding					
ISSAIs	International Standards of Supreme Audit Institutions					
LC	Land Commission					
LLA	Liberia Land Authority					
NASSCORP	National Social Security Corporation					
L\$	Liberian Dollar					
PFM	Public Financial Management					
PPCC	Public Procurement and Concession Commission					
RL	Republic of Liberia					
US\$	United States Dollar					

## Republic of Liberia



#### TRANSMITTAL LETTER

## THE HONORABLE SPEAKER OF THE HOUSE OF REPRESENTATIVES AND THE

#### HONORABLE PRESIDENT PRO-TEMPORE OF THE LIBERIAN SENATE

We have undertaken the Compliance Audit of the Liberia Land Authority (LLA) operations and financial transactions for the period July 1 2020 – June 30, 2021. The audit was conducted in line with Section 2.1.3 of the General Auditing Commission (GAC) Act of 2014.

Findings conveyed in this report were formally communicated to the authority of the Liberia Land Authority (LLA) for their responses. The reportable issues were submitted through a Management Letter. Where responses were provided, they were evaluated and were incorporated in this report.

Given the significance of the matters raised in this report, we urge the Honorable Speaker and Members of the House of Representatives and the Honorable Pro- Tempore and Members of the Liberia Senate to consider the implementation of the recommendations conveyed in this report with urgency.

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

**Monrovia, Liberia** september 2023



# AUDITOR GENERAL'S REPORT ON THE COMPLIANCE AUDIT OF THE LIBERIA LAND AUTHORITY (LLA) FINANCIAL TRANSACTIONS FOR THE PERIOD JULY 1 2020 – JUNE 30, 2021

The General Auditing has concluded a compliance audit of the Liberia Land Authority (LLA). The compliance audit has been conducted in compliance with relevant laws and regulations consistent with the Auditor General's mandate as provided for in Section 2.1.3 of the New General Auditing Commission (GAC) Act pf 2014 as well as in accordance with all relevant laws.

#### **Adverse Conclusion**

Based on the work performed, because of the significance of the non-compliance matters noted in the Basis for Conclusion paragraphs below, the subject matter is not in all material respect, in compliance with the PFM Act as amended and restated (2019) and Regulations, GoL Financial Rule (2006-2009), Budget Laws, the Approved Travel Ordinance of 2016/2017, the Standing Orders for the Civil Service of 2020, the Decent Work Act of 2015, Committee of Sponsoring Organizations of the Treadway Commission (COSO), and other relevant authoritative policies & procedures for the period then ended July 1, 2020 to June 30, 2021.

# **Basis for Conclusion**

Management did not prepare quarterly and annual financial statements for onward submission to the Offices of the Auditor General and the Comptroller and Accountant General.

Management did not maintain detailed accounting journals and ledgers.

Internally generated revenues totalling of US\$4,750.00 could not be traced to the entity's bank statements.

Management did not prepare bank reconciliation reports for all of its account. Only three out twelve months had bank reconciliation reports.

Management did not adopt and operationalize Financial and Administrative Manual, Strategic and Operational Plans, Human Resource Policy Manual, Fixed Asset Management Policy, Petty Cash Policy.

Management made several payments totalling US\$1,824.00 and L\$45,000.00 to third parties instead of the vendors, suppliers or their named legal representative.

Management did not withhold and remit taxes on goods and services procured totalling US\$15,432.36 & L\$45,000.



Auditor General's Report on the Compliance Audit of the Liberia Land Authority (LLA) for the fiscal period ended June 30, 2021

Management procured goods and services totalling US\$40,100.62and L\$227,000.70 without evidence

of an approved procurement plan.

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

**Monrovia, Liberia** September 2023

## **Background**

The Compliance audit of the Liberia Land Authority was commissioned by the Auditor General under his statutory authority as provided for under Section 2.1.3 of the GAC Act of 2014.

The LLA is a Government entity created by an Act of the Legislature in 2016 with the authority to control and manage effectively, impartially and in the interest of equitable development, access to and use of public land, except reserves, protected areas, proposed protected areas and diplomatic missions.

It is mainly funded by Legislated funds with some donor assistance from development partners. The entity's operations are subject to audit by the Office of the Auditor General. The entity is required by the PFM Regulation I.15(2) to submit financial statements to the Offices of the Auditor General and the Comptroller and Accountant General.

## **Key Management Personnel**

The following personnel were responsible for the management of the LLA for the period under audit.

Name	Position	Period
Attorney Adam Manobah	Chairperson	2016-present
Stanley Toe	Executive Director	2016-present
Aryee Williams	Executive Director for Administration	2018- present
Augustus Paasewe	Comptroller	2018-present
Josephus Burgess	Commissioner - Land Administration	2018-present

## **Objectives**

The objectives of the audit are to:

- i. To gather sufficient and appropriate audit evidence to form and derive a conclusion whether or not, the LLA Operations with special emphasis on: (a) Revenue/Income Generation Areas (national budgetary allocation, fees collected from the public and any donor funding); (b) Expenditure for goods, services and personnel compensation as well as capital consumption; (C) Internal Control Systems (Governance and operational structures) for the periods July 1, 2018 through June 30, 2021 are in compliance, in all material respect, with relevant laws, regulations, policies and procedures; and
- ii. To report in terms of the GAC reporting requirements as spelt out in part four (4) of the GAC Act of 2014, the findings and conclusions to the Liberia National Legislature.

#### **Subject Matter Description**

Failure on the part of the entity to submit financial statements, the Auditor General commissioned a compliance audit to examine the operations and financial transactions of the Authority reference to the entity's handling and accounting for its revenue and other income generation, expenditure for goods and services, as well as its systems of internal control.



We have conducted a compliance audit of the Liberia Land Authority (LLA), on the subject matter 'Validation of the LLA operations with special emphasis on:

- a) Revenue/Income Generation Areas (national budgetary allocation, fees collected from the public and any donor funding);
- b) Expenditure for goods, services and personnel compensation as well as capital consumption; and
- c) Internal Control Systems (Governance and operational structures) of the entity for fiscal period July 1, 2018 through June 30, 2019'.

## **Audit Scope**

A compliance audit on the financial operations of the LLA covering the period July 1, 2020 to June 30, 2021 was commissioned by the Office of the Auditor General. The audit covers specifically revenue and other income generation, expenditure for goods and services, as well as system of internal controls of the entity.

#### **Audit Criteria**

The criteria for the audit are drawn from authorities of:

- The Public Financial Management Act of 2009 as amended and restated 2019
- Public Procurement Concession (PPC) Act of September 2010,
- The Approved Travel Ordinance of 2016/2017
- The Standing Orders for Civil Service of 2012
- The Decent Work Act of 2015
- Committee of Sponsoring Organizations of the Treadway Commission (COSO)
- Other relevant authoritative policies & procedures

This audit is based on document analyses and interviews, and meetings with the Senior Management and key staffs of the Liberia Land Authority (LLA) during the periods under audit. In the process of information gathering, we had several meetings with the Officials and staffs indicated above and have assessed relevant documents including transactional documents, reports, and policy documents which are appropriate for our conclusion. The audit was conducted in accordance with ISSAI 4000 INTOSAIs Standards for Compliance Audit.

## **Limitation of Responsibility**

The audit involves performing procedures to obtain audit evidence about the subject matter's compliance with applicable authorities identified as criteria. The procedures selected depend on the auditor's professional judgement, including the assessment of the risks of material non-compliance of the subject matter, whether due to fraud or error.

Because of the inherent limitations of audit, together with the inherent limitations of internal controls, there is an unavoidable risk that some material non-compliance may not be detected, even though the audit is properly planned and performed in accordance with the ISSAIs. In making our risk assessments, we considered internal control relevant to the subject matters but not for the purpose of concluding on the effectiveness of the entity's internal control.



## 1 FINDINGS AND RECOMMENDATIONS ON THE

#### 1.1 **Financial Issues**

#### **Irregular Monthly Bank Reconciliation** 1.1.1

#### Observation

- 1.1.1.1 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.
- 1.1.1.2 During the audit, we observed that bank accounts were not reconciled regularly on a monthly basis. Reconciliation of bank accounts were done for three months only.

#### Risk

- 1.1.1.3 Failure to perform monthly bank reconciliation may lead to untimely detection of errors, omissions or fraudulent financial practices.
- 1.1.1.4 Management may not be able to fully account for its bank transactions

#### Recommendation

- 1.1.1.5 Management should ensure that monthly bank reconciliation for all its bank accounts during the fiscal period are appropriately prepared, reviewed and approved by staff with the required qualification and competence.
- 1.1.1.6 Monthly bank reconciliation report should be adequately documented and filed to facilitate future review.

#### Management's Response

1.1.1.7 Management did not provide a response

#### Auditor General's Position

- 1.1.1.8 In the absence of a response, we maintain our finding and recommendations. We will follow up on the implementation of our recommendations during subsequent audit.
- Management is therefore in breach of Regulation A.20 of the PFM Act of 2009 as amended 1.1.1.9 and restated 2019.

#### 1.1.2 No Approved Financial Accounting Manual

## **Observation**

- 1.1.2.1 Regulation A.5, Government Agency's Accounting Manuals, states:
  - 1) "A head of government agency shall with the approval of the Minister issue an



accounting manual to suit the operations and regulate the financial matters of the Government agency, indicating:

- a. the duties to be performed by specified officers,
- b. the accounts to be kept and returns to be submitted, and
- c. such other instructions as may be required for the proper conduct of the financial matters of the Government agency.
- 2) The accounting manual shall contain relevant procedures for the keeping of accounts, preparation and format of financial statements, Government agency chart of accounts, and all administrative issues relating to the keeping and preparation of government accounts.
- 3) The accounting manual under sub-regulation (2) shall conform to any enactment, or any particular directions concerning accounts issued by the Minister.
- 4) A Government agency that does not have its own accounting manual shall use the Treasury Accounting Instructions issued by the Minister in accordance with regulation (1) above or obtain permission from the Minister to use an accounting manual prepared for another Government agency".
- 1.1.2.2 During the audit, we observed there was no evidence of an approved financial manual of the Liberia Land Authority LLA.

#### Risk

1.1.2.3 Failure to develop policies and procedures to guide the activities of the entity may lead to arbitrary decisions that may be non-compliant to applicable laws and regulations and may impair the achievement of the entity's objectives.

#### Recommendation

- Management should develop, approve and operationalize policies and procedures to govern 1.1.2.4 the effective and efficient financial operations of the entity.
- Evidence of approved policies and procedures should be adequately documented and filed 1.1.2.5 to facilitate future review.

## **Management's Response**

1.1.2.6 During the audit, the LLA had a draft financial manual that was in the process of being validated for use by the entity. As at now, the financial manual has been finalized and approved by the LLA Board of Commissioners (BOC) and is being used to govern the effective and efficient financial operations of the entity. Attached is a copy of the manual and Board resolution approving same.

#### **Auditor General's Position**

1.1.2.7 We acknowledge Management's acceptance of our finding and recommendations. We will follow up on the implementation of our recommendation during subsequent audit.



#### 1.1.3 **No Petty Cash Policy**

#### **Observation**

- 1.1.3.1 Regulation B.33 of the PFM Act- Authorized Petty Cash Balances states:
  - 1) "The government agency accounting manual shall specify officers, designated by posts, who may hold cash and their authorized cash balances which are the maximum amounts that may be held by them during periods when their offices are closed for business.
  - 2) Names and titles of designated officers and amounts to be held in cash at specific periods and designated posts shall be communicated to and have the prior written approval of the Comptroller-General.
  - 3) For the purpose of these regulations, all checks, not specified for any other purpose, shall be deemed to be cash.
  - 4) In terms of this regulation, the maximum amount that may be held as petty cash in any one calendar month, is the equivalent of United Sates Dollars Two Hundred".
- 1.1.3.2 Again, The Committee of Sponsoring Organizations of the Treadway Commission (COSO) Internal control framework on control activities states: "Institutions deploy control activities through policies that establish what is expected and procedures that put policies into action". Policies and procedures are established and implemented to help ensure that risk responses are effectively carried out within an entity.
- 1.1.3.3 During the audit, we observed that Management did not have a policy in place for controls over the establishment and use of petty cash.

## Risk

- In the absence of the petty cash/impress system, petty cash may not be available to procure 1.1.3.4 supplies and services of very minimum value.
- 1.1.3.5 Management may endure the rigors of exhausting the procurement procedures for purchase of supplies and services of very minimum value. This may impair the efficient operations of the entity.

#### Recommendation

- 1.1.3.6 Management should develop, approve and operationalize a petty cash policy to govern the management of petty cash of the entity. The policy should include provisions for the following:
  - Nature of petty cash transactions
  - The size of the petty cash/imprest
  - The threshold of petty cash transactions
  - The custodian and safe of petty cash



- Activities over processing petty cash and disbursement of petty cash transactions
- Activities over replenishment of petty cash
- 1.1.3.7 All relevant supporting documents including approved petty cash policy and payment vouchers for petty cash disbursement and replenishment should be adequately documented and filed to facilitate future review.

## **Management's Response**

1.1.3.8 During the audit, LLA had a draft petty cash policy that was in the process of being authorized for use. As it at now, the petty cash remittance policy procedures manual has been completed and approved and it is being used. The procedure and guidelines have been established for the effective administration and internal control of petty cash handling operations throughout the Authority, especially the use and accountability of such funds. Attached is a copy of the Manual and the Board resolution approving same.

#### **Auditor General's Position**

- 1.1.3.9 We acknowledge Management's acceptance of our finding and recommendations. We will follow up on the implementation of our recommendations during subsequent audit.
- 1.1.3.10 Management is therefore in breach of financial discipline in line with Regulation A.20 of the PFM Act of 2009 as amended and restated 2019.

## 1.1.4 No Human Resource Manual

## **Observation**

According to the PFM Regulation of 2009 T.1 and T.3 which states: "For the purposes of 1.1.4.1 these regulations the term -personnel emolument- covers all payments due to public servants as remuneration for employment and include: (a) Basic salaries payable to public servants (b) Wages payable to public servants employed in daily rated post; and (c) Allowances for special duties, overtime, acting, entertainment, housing, medical, transportation, fuel, light, clothing or allowances in lieu of accommodation, domestic servants, and any additional remuneration due to public servants as part of their conditions of service. (d) Pensions, gratuities, contributions of the employer towards pensions, gratuities and social security (2) Subject to any enactment, basic salary shall be used for computation of allowances, pensions, gratuities or any other entitlement of public servants except where the allowances have been incorporated into the salaries. (3) Subject to any amendment to this sub-regulation by the Minister, overtime for public servants shall be computed based on the number of overtime hours worked and a 20 per cent ceiling on the basic salary. The overtime hours and the daily rate shall be computed as follows: (a) The number overtime hours worked shall be calculated as 1.5 times the actual overtime hours worked on week days and two times the actual overtime hours worked on weekends and holidays. (b) The hourly overtime rate shall be determined by dividing the daily rate by eight hours. (c) The daily overtime rate shall be derived by dividing the basic monthly salary by 22 days.



- 1.1.4.2 Again, Regulation T.3 Records of Personnel Emolument states "(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. (2) The records for the purpose of this regulation shall be as specified in the Government Agency's Accounting Manual.
- 1.1.4.3 During the audit, we observed no evidence of an approved Human Resource manual to address staff renumerations in line with GoL personnel emoluments.

- 1.1.4.4 Payrolls may be prepared at the discretion of authorities.
- 1.1.4.5 There may be illegitimate persons (ghost names) on the payroll.
- 1.1.4.6 Payroll personnel may make unauthorized adjustments to the payroll.

#### Recommendation

- 1.1.4.7 Management should develop, approve and operationalize policies and procedures to govern the effective and efficient staff compensation/emolument issues of the entity.
- 1.1.4.8 Evidence of approved policies and procedures should be adequately documented and filed to facilitate future review.

#### **Management's Response**

1.1.4.9 Management did not respond to the audit query.

## **Auditor General's Position**

- 1.1.4.10 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.
- 1.1.4.11 Management is therefore in breach of financial discipline in line with Regulation A.20 of the PFM Act of 2009 as amended and restated 2019.

#### 1.1.5 **No Evidence of payments of Social Security Taxes**

#### **Observation**

1.1.5.1 Section 89.16 of the Act to repeal Decree No.14 of the People's Redemption Council of the Armed Forces of Liberia and to create a new chapter 89 of the Executive Law establishing the National Social Security and Welfare Corporation of the Republic of Liberia requires the following:



- 1.1.5.2 That contribution payable under the Act in respect of employee and employer contribution shall total 10% of total gross remuneration of each employee.
  - 4% employee pension contribution
  - 4% employer pension contribution
  - 2% employment injury scheme
- 1.1.5.3 During the audit, we observed no evidence that Management made NASSCORP contribution payments for the period.

- 1.1.5.4 The contributions due to NASSCORP may be misstated.
- 1.1.5.5 Potential retirees of the entity may be denied required pension benefits due to non-compliance with the regulation.

#### Recommendation

- 1.1.5.6 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.
- 1.1.5.7 Management should facilitate full payment of employees' and employer's contributions to NASSCORP on a consistent and timely basis.
- 1.1.5.8 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.
- 1.1.5.9 In the instance where MFDP withholds and remits social security to NASSCORP on behalf of the entity, Management should obtain copies of monthly remittances of social security contributions. Copies of monthly remittances should be adequately documented and filed to facilitate future review.
- 1.1.5.10 Going forward, Management should ensure compliance with the regulation as provided above.

#### Management's Response

1.1.5.11 Management did not provide a response.

## **Auditor General's Position**

1.1.5.12 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.



## 1.1.6 No policy on Salary Advance

#### **Observation**

- 1.1.6.1 Paragraph 17 of the Internal Integrated Framework, published by the Committee of Sponsoring Organizations of the Treadway Commission (COSO) indicates that in most cases, the board or head of public entity is ultimately responsible for determining whether management has implemented effective internal control including monitoring. The institution makes this assessment by (a) understanding the risks the organization faces and (b) Gaining an understanding of how senior management mages or mitigates those risk that are meaningful to the organization objectives. Obtaining this understanding includes determining how management supports its beliefs about the effectiveness of the internal control system in those areas.
- 1.1.6.2 Regulation T.9 of the PFM Act of 2009 states "(1) Recoveries from official salaries shall commence from the salary of the next complete month after the month in which the advance was made. (2) 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.

#### **Observation**

1.1.6.3 During the audit, we observed that Management did not facilitate the full liquidation of salary advance for the approved deduction period for a staff who benefitted from salary advance of US\$500.00 being recovered. **See table 1 below.** 

**Table 1- Salary Advance** 

Date	Name	Amount (US\$)
Jan. 4, 2021	Joseph N. Yeanay	500

#### Risk

- 1.1.6.4 In the absence of an approved policy, repayment of salary advances may not be made within a reasonable time frame.
- 1.1.6.5 Non-payment of salary advance by employee may lead to loss of the entity revenue.
- 1.1.6.6 Unauthorize salary advances may lead to misapplication of the entity' fund.

#### Recommendation

- 1.1.6.7 Management should ensure that the amount due is fully recovered from the individual staff concerned.
- 1.1.6.8 Management should develop, approve and operationalize a salary advances policy to govern the receipt and repayment of salary advances.



- Management should establish a salary advance schedule, detailing the amount received, 1.1.6.9 periods of payments, agreed repayment per period, actual payments and outstanding balances. A monthly reconciliation should be performed between the payroll journal and the salary advance schedule to ensure that due payments are adequately affected.
- 1.1.6.10 Evidence of approved policy, request for advances, payment vouchers and repayment transactions should be adequately documented and filed to facilitate future review.

## **Management's Response**

1.1.6.11 Management did not provide a response.

#### **Auditor General's Position**

- 1.1.6.12 In the absence of a Management's response, we maintain our finding and recommendations. We will follow up on the implementation of our recommendations during subsequent audit.
- 1.1.6.13 Management is therefore in breach of financial discipline in line with Regulation A.20 of the PFM Act of 2009 as amended and restated 2019.

#### 1.1.7 **Internal Revenue Receipts not Traceable to Bank Statements**

#### Observation

- Regulation B.11 of the PFM Act of 2009 states that (1) except as otherwise provided in any 1.1.7.1 other enactment, the collection of public and trust monies shall be the personal responsibility of the head of a government agency, who shall appoint supervising collectors for each area where collection is required. (2) The head of a government agency shall ensure that adequate safeguards exist and are applied for the assessment, collection of and accounting for such moneys collectable by the Government agency, office or institution. (3) The head of a government agency shall ensure that all persons liable to pay revenue are informed by bills, demand notes or other appropriate notices, of debts which are due and that adequate measures are taken to obtain payment.
- 1.1.7.2 Regulation B.9 of the PFM Act of 2009 as revised in 2019- Accounting and Disclosure of Non-Tax Revenue states "(1) A head of government agency shall fully disclose all non-tax revenues collected, lodged or retained as part of the monthly revenue collection and quarterly Government agency account or financial report to the Minister and the Auditor General. The reporting format shall include, but not limited to:
- The Government agency's collection points in the regions and districts by type of Non-Tax 1.1.7.3 Revenue;
  - a) The extent to which the Government Agency revenue target for the month has been achieved and measures that need to be taken to address any shortfall;
  - b) Expenditure incurred out of retained Non-Tax Revenue including
  - c) Internally Generated Funds classified according to the Budget Classification;
  - d) Non-Tax Revenue including Internally Generated Funds due but not collected;



- e) Any Non-Tax Revenue including Internally Generated Funds leakages and measures to address them; and
- (f) Certification confirming reconciliation of lodgements with collections.
- During audit, we observed that total receipts of US\$4,750.00 recorded as internally 1.1.7.4 generated revenue could not be traced to the bank statements.

- 1.1.7.5 Revenue may be misappropriated.
- 1.1.7.6 Financial statements may be misstated.

#### Recommendation

- 1.1.7.7 Management should provide explanation with supporting documentations for the omission of the revenue from its bank statement.
- 1.1.7.8 Management should develop a real-time reconciliation of deposits for services made at banks before the issuance of official receipt.
- 1.1.7.9 Going forward, Management should develop and maintain cash ledger / cashbook and record all cash receipts. Subsequently, Management should perform monthly reconciliation between the cash receipts, cashbook and the bank statements. Variances identified should be investigated and adjusted where applicable in a timely manner.
- 1.1.7.10 Evidence of monthly revenue reconciliation should be adequately documented and filed to facilitate future review.

## **Management's Response**

1.1.7.11 Management did not provide a response.

#### **Auditor General's Response**

- 1.1.7.12 In the absence of Management's response, we maintain our finding and recommendations. We will follow up on the implementation of our recommendations during subsequent audit.
- 1.1.7.13 Management is therefore in breach of financial discipline in line with Regulation A.20 of the PFM Act of 2009 as amended and restated 2019.

#### 1.1.8 **Procurement Irregularities**

#### **Observation**

Section 40 of the Public Procurement and Concession (PPC) Act of 2005, amended and 1.1.8.1 restated 2010- Procurement Planning states, "All Procuring Entities shall undertake procurement planning, with a view to achieving maximum value for public expenditure and the other objects of this Act.



- 1.1.8.2 (2) For each fiscal year the Procurement Unit shall prepare a draft annual procurement plan for goods, works and services for use by the Procuring Entity in the Procuring Entity's budgeting process. Upon budget approval, the Procurement Unit shall prepare an annual procurement plan for goods, works and services in accordance with the Procuring Entity's approved programs and budget and furnish it to the Procurement Committee. The plan shall include.
  - a) A brief description of each planned procurement contract;
  - b) The estimated cost of each planned procurement contract;
  - c) The procurement method to be used; and
  - d) Processing steps and time schedules.
- 1.1.8.3 Section 28 (P1) of the PPC Act states that" A Procurement Committee shall meet as and when required to review a bid or perform related functions but shall in any event meet at least once every quarter.
- 1.1.8.4 During the audit, we observed that Management procured goods and services valued at US\$40,100.62and L\$227,000.70 without an approved procurement plan. See Appendix.
- 1.1.8.5 We further observed no evidence of quarterly reports from Management being submitted to the Public Procurement Concession Commission (PPCC).
- 1.1.8.6 additionally, during the audit, we observed Management did not provide procurement committee's minutes and attendance records as evidence that a functional procurement committee exists.

- 1.1.8.7 In the absence of a functional procurement committee, the entity's procurement processes may be discretional.
- 1.1.8.8 The lack of Procurement Plan may lead to discretionary expenditure, waste and impair value for money.
- 1.1.8.9 In the absence of a quarterly procurement report, Management may be in noncompliance with the PPC Act of 2005 as amended and restated in 2010.
- 1.1.8.10 Management may not adequately account for its procurement activities and impair effective monitoring of its procurement activities by the PPCC.
- 1.1.8.11 Management may not be compliant with the required procurement method thereby impairing the achievement of value for money.

## Recommendation

1.1.8.12 Management should ensure that the procurement committee is made functional, evidence by the documentation of attendance records and meeting minutes.



- 1.1.8.13 Management should facilitate the preparation and subsequent approval of annual procurement plan. The approved procurement plan should contain description of all procurement transactions, projected costs and required method of procurement.
- 1.1.8.14 The procurement plan should also be updated and approved periodically to reflect adjustment in procurement activities. Management should ensure that required procurement methods are utilized for all procurement transactions.
- 1.1.8.15 Management should facilitate the preparation of quarterly procurement reports and subsequent submission to the PPCC.
- 1.1.8.16 Quarterly Procurement report should be adequately documented and filed to facilitate future review.

## Management's Response

1.1.8.17 Conversant with section 40 (2) (3) of the restated and amended Public Procurement and Concessions Act of 2010, the LLA for the Audit period under consideration, prepared annual procurement plans and obtained approvals from the Public Procurement and Concessions Commissions. Evidence of these approvals are attached for your consideration.

#### **Auditor General's Position**

1.1.8.18 Management's assertions are 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.

#### Non-remittance of Vendor's withholding Taxes 1.1.9

## **Observations**

- 1.1.9.1 Section 905 (J) of the Revenue Code of Liberia Act of 2000 as amended in 2011 stipulates: "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".
- 1.1.9.2 During the audit, we observed that Management did not withhold taxes on goods and services. The total payment vouchers amounted to US\$15,432.36 & L\$ 45,000. See **Annexure B**

#### Risk

- 1.1.9.3 Failure to withhold and remit GST may deny GoL of the much-needed tax revenue.
- Management may be noncompliant with Section (905) J. of the Revenue Code of Liberia 1.1.9.4 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 referenced above.



1.1.9.5 Non-remittance of withholding taxes may lead to an overstatement of the cash book and subsequently the financial statements.

#### Recommendation

- 1.1.9.6 Management should provide substantive justification for not withholding and remitting GST.
- 1.1.9.7 Going forward, Management should withhold GST on all goods and services procured and facilitate full remittance of GST to the general revenue account in keeping with Section 905 (J) of the Revenue Code of Liberia Act of 2000 as amended in 2011.
- 1.1.9.8 Evidence of remittances of GST including official flag receipts should be adequately documented and filed to facilitate future review.

## **Management's Response**

1.1.9.9 LLA Management notes your observations concerning not withholding taxes on goods and services and can assure you that it will act in accordance with the PFMU regulation.

#### **Auditor General's Position**

1.1.9.10 We acknowledge Management's acceptance of our finding and recommendations. We will follow up on the implementation of our recommendation during subsequent audit.

#### 1.1.10 Failure to Retire Incidental and 80% DSA

## **Observation**

- 1.1.10.1 Count 31-36 of the Approved Travel Ordinance states that upon return from abroad, officials are required to submit to the Financial Regulations Unit of the Ministry of Finance and Development Planning, a Travel Settlement Form as per Annexure II and copy of certificates for workshops, seminars, etc., receipts for accommodation and incidental expenses within 14 days from the date of return from tour or before date of next journey, whichever is earlier. In very exceptional cases where the second tour is performed immediately after return from the first tour; the second advance may be granted with the specific written approval of the official concerned, explaining the reasons thereof. 32. No future travel advances shall be processed to any official from an institution in which an official from a previous trip has not submitted the prescribed Travel Settlement Form and attachments with the expiry of the 14 days deadline in rule 26. The entire travel advance shall be recovered from those who fail to submit the Travel Settlement Form on return from their visit abroad, and those who subsequently leave the service of the Government, from any arrears due to them by the Government. 33. The Ministry of Finance and Development Planning shall maintain on a current basis full documentation on each travel made from government money. This shall include all receipts for hotels and incidental expenses submitted by officials who travelled during the fiscal year.
- 1.1.10.2 Count 13 of the ordinance states "No future domestic travel advance shall be paid to anyone who has failed to submit the prescribed domestic travel settlement form within 5 working



days after return from previous journey. Heads of Ministries and Agencies shall ensure their officials submit domestic travel report or future travel requests from the institution may not be honored".

#### **Observation**

- 1.1.10.3 During the audit, we observed that several officials and staff who made domestic and foreign travels did not retire their incidental allowances and up to 80% of their DSA.
- 1.1.10.4 Additionally, we observed no evidence of travel and settlement forms being attached to the payment vouchers totaling US\$2,233 and L\$41,871.80 spent on DSA from our sample size selected. See Annexure C.

#### Risk

- 1.1.10.5 Management may not be compliant with the Travel ordinance.
- 1.1.10.6 Travel may not be related to the entity's operations or there may have been no travel.
- 1.1.10.7 Non-compliance with the national travel ordinance may lead to misappropriation and abuse of funds.

#### Recommendation

- 1.1.10.8 Management should provide justifiable reasons for not ensuring that its staff comply with the Travel Ordinance.
- 1.1.10.9 Going forward, Management should adhere to the provisions of the Approved Travel Ordinance as mentioned above, ensuring that travel and incidental allowances are retired timely.
- 1.1.10.10 Evidence of retirement of travel advances should be adequately documented and filed to facilitate future review.

## Management's Response

1.1.10.11 Management did not provide a response

### **Auditor General's Position**

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

## 1.1.11 No Evidence of Tax Clearance and Business Registration

#### Observation

1.1.1.1.1 Part U.9. (4) of the Public Financial Management (PFM) Regulation of 2010 states that "A Government Agency shall procure government inventories from persons whose business is registered by the Registrar General's Office and any Government Agency that requires an



exemption for any specific case shall apply to the head of government agency with the necessary justification."

1.1.11.2 During the audit, it was observed that the Management authorized payments amounting to US\$ 6,932.90 and L\$45,000.00 to businesses without valid business registration & tax clearance documents. **See Annexure D.** 

#### Risk

1.1.11.3 Management's failure to obtain valid business registrations and tax clearance from vendors may deny Government of needed tax revenues.

#### Recommendation

- 1.1.11.4 Management should provide substantial justification with supporting documents for transaction with businesses that did not have business registration and tax clearance.
- 1.1.11.5 Going forward, Management should ensure that for all transaction involving procurement of goods and services, valid business registration certificate and valid tax clearance should be obtained as required by Part U.9. (4) of the Public Financial Management (PFM)Regulation of 2010 and Part V Section 62 (2) of the Public Procurement and Concession (PPC) Act of 2005 amended and restated in 2010

## **Management's Response**

1.1.11.6 Management did not provide a response

## **Auditor General's Position**

- 1.1.11.7 In the absence of a response, we maintain our finding and recommendations. We will follow up on the implementation of our recommendations during subsequent audit.
- 1.1.11.8 Management is therefore in breach of financial discipline in keeping with Regulation A.20 of the Public Financial Management Act of 2009 as amended and restated 2019

## 1.1.12 Third Party Payments to Made Employee

#### **Observation**

- 1.1.12.1 Regulations B.28 of the PFM Act of 2009 states "A payment shall be made only to the person or persons named on the payment voucher or to their representatives duly and legally authorized in writing to receive the payment".
- 1.1.12.2 During the audit, we observed that Management made several payments totaling US\$1,824.00 andL\$45,000.00 in the name of employees of LLA instead of the vendors, service providers or direct beneficiaries or their legally authorized representatives. **See table 2 below.**



**Table 2- Third Party Payments to Employees** 

Date	Vouch NO.	DESCRITPTION	PAYEE	BANK	\$US	\$LD
		Payment for the				
		supply of water from				
		March 23-April 23-				
5/6/2021	PV-05-001	2021	George Kollie	CBL	353.00	
		Payment for 20gallons				
10/9/2020	PV-10-021	of fuel for LLA	George Kollie	GLOBAL	350.00	
10/29/2020	PV-10-046	Fuel For generator	George Kollie	GLOBAL	371.00	
		payment for materials				
		& cleaning waste from				
		various restrooms to				
11/25/2020	PV-11-026	stop the overflowing	George Kollie	GLOBAL	250.00	
		Payment represents				
		the replenishment of				
		the lavatory water	Boima			
10/22/2020	PV-10-036	fund	Charles Kiadii	GLOBAL	250.00	-
		Payment for the				
		replenishment for LLA	Boima			
11/17/2020	PV-11-019	lavatory water fund	Charles Kiadii	GLOBAL	250.00	1
		Payment for				
		replenishment of	Boima			
12/9/2020 PV-12-001 bathroom water fund Charles Kiadii GLOBAL		GLOBAL	-	45,000.00		
Subtotal					1,824.00	45,000.00

1.1.12.3 Failure to obtain valid business registrations and tax receipts from vendors may deny Government of the needed tax revenues.

#### Recommendation

- 1.1.12.4 The Management should ensure that for all transactions involving procurement of goods and services, valid business registration and tax clearance certificates should be obtained as required by Part U.9. (4) of the Public Financial Management (PFM)Regulation of 2010 and Part V Section 62 (2) of the Public Procurement and Concession (PPC) Act of 2005 amended and restated in 2010.
- 1.1.12.5 Evidence of valid business registration and tax clearance certificates should be adequately documented and filed to facilitate future review.

## **Management's Response**

1.1.12.6 LLA Management regrets the above observation and notes to follow the necessary procurement process before payment is made. In addition, we noticed the detachment of some documents from our payment vouchers due to relocation.



## **Auditor General's Position**

- 1.1.12.7 We acknowledge Management's acceptance of our finding and recommendations. We will follow up on the implementation of our recommendations during subsequent audit.
- 1.1.12.8 Management is therefore in breach of financial discipline in line with Regulation A.20 of the PFM Act of 2009 as amended and restated 2019.

## 1.1.13 Transactions Without Supporting Documentations

#### Observation

- 1.1.13.1 Section A.3 of the PFM Regulations of 2009 "(1) 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 accounts and records of the transactions for inspection when called upon to do so by the Auditor General, the Comptroller General , the relevant
- 1.1.13.2 During the audit, we observed that Management made payments amounting to US\$11,238.00 without evidence of supporting documentations. **See Table 3 below**.

**Table 3-Transactions without supporting documents** 

Date	Vouh. No.	Description	Payee	Bank	Amount
			Atty.J. Adams		
2/10/2021	PV-02-018	DSA for presidential tour	Manobah	GLOBAL	1,500.00
2/10/2021	PV-02-019	DSA for presidential tour	Sampson E. Paye	GLOBAL	525.00
		Payment representing			
		stationery for LLA offices,			
		County Offices & Customer	J.J.Stationery &		
5/10/2021	PV-05-005	Services.	Book Supply	CBL	3,083.52
		Payment representing pier			
		deim, fuel, water, feeding			
		of the two teams in the on-			
		going intra Governmental	Abudrazah M.		
5/11/2021	PV-05-007	League.	Sombai	CBL	473.00
		payment representing			
		procurement of white board			
		and white board marker for	J.J. Stationery &		
5/11/2021	PV-05-008	the Authority.	Book Supply	CBL	387.00
		Payment representing DSA			
		and transportation for			
		Internal Audit director of			
		LLA for field verification to			
5/12/2021	PV-05-013	Nimba, Bong and Margibi.	Z. Tenson Ballah	CBL	380.00
4/20/2021	PV-05-014	payment for stationaries	J.J Book store	CBL	441.98
5/12/2021	PV-05-016	Payment represinting DSA	Mamie K. B.	CBL	275.00



Date	Vouh. No.	Description	Payee	Bank	Amount
		and transportation for	Dugulu		
		Customer Services Staff of			
		LLA for field verification to			
		Nimba, Bong and Margibi.			
		Payment representing			
		purchase of remaining			
		spare parts for the repair of			
5/19/2021	PV-05-027	Authority's Nissan Patrol.	Joself Y.Wee	CBL	800.00
		Payment represent the			
		procurement of one Laptop			
5/21/2021	PV-05-028	for IT staff	Office Ideas	CBL	1,406.30
		Payment representing			
		procurement for janitorial			
5/13/2021	PV-05-019	supplies	Sakouk shopping	CBL	609.80
		Payment representing the			
		servicing of UN Women	Blessed Amazon		
6/30/2021	PV-06-008	vehicle	Auto Service	GLOBAL	302.40
		Payment representing the			
		3rd installment as bond	Lion Stationery		
6/30/2021	PV-06-009	payment	Store	GLOBAL	434.00
		Payment representing			
		publishing of Justice Yussif			
6/11/2021	PV-06-002	D. verdict on LLA functions	Kweshie Tetteh	GLOBAL	620.00
Total					11,238.00

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

## Recommendation

- 1.1.13.6 Management should provide substantial justifications supporting documents to justify all these payments.
- 1.1.13.7 Going forward, Management should ensure all transactions are supported by the requisite supporting documents consistent with the financial management regulations.

## **Management's Response**

1.1.13.8 Management did not provide a response



#### **Auditor General's Position**

- 1.1.13.9 In the absence of a response, we maintain our finding and recommendations. We will follow up on the implementation of our recommendations during subsequent audit.
- 1.1.13.10 Management is therefore in breach of financial discipline in keeping with the Public financial Management Act of 2009 as amended and restated 2019

## 1.1.14 Irregularities Associated with Fuel Consumption

#### Observation

- 1.1.14.1 Regulations A.3 of the Public Financial Management (PFM) Act of 2009 states" 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 accounts and records 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, by the Minister".
- 1.1.14.2 During the audit, it was observed the following irregularities associated with the purchase and consumption of fuel at various:
- 1.1.14.3 During the audit, we observed that Management made a payment totaling US\$4,132.69 for fuel and gasoline without evidence of a consumption report or replenishment log. See table 4 below

Table 4: Payment for fuel and gasoline without consumption report

DATE VHR NO.		DESCRIPTION	PAYEE	BANK	AMT. USD
		Payment for Fuel for LLA 250KVA			
7/9/2020	PV- 07-009	Generator	Super Petroleum	CBL	288.39
10/29/2020	PV-10-046	Fuel For generator	George Kollie	CBL	1,760.91
4/1/2021	PV-04-009	Payment representing the procurement of Diesel	Super Petroleum	CBL	350.00
		Payment representing fuel for			
		generator, three days (April 12-15.			
4/13/2021	PV-04-013	2021).	George Kollie	CBL	353.00
		Payment represents the			
		procurement of fuel for LLA			
		Commissioners vehicles for the			
5/28/2021	PV-05-010	Month of June 2021	Super Petroleum	GLOBAL	371.00
		Payment for Fuel for LLA 250KVA			
9-Jul-20	PV- 07-009	Generator	Super Petroleum	GLOBAL	288.39
		Payment for 20gallons of fuel for			
10/9/2020	PV-10-021	LLA	George Kollie	GLOBAL	350.00
10/29/2020	10/29/2020 PV-10-046 Fuel For generator G		George Kollie GLOBAI		371.00
Total					4,132.69



- 1.1.14.4 Fuel procured may not be based on an actual consumption.
- 1.1.14.5 Management may spend above budgeted allocation and fuel may be subjected to misappropriation or theft.

#### Recommendation

1.1.14.6 Management should maintain a fuel consumption and distribution log to help the entity manage cost and inform future purchase.

# **Management's Response**

1.1.14.7 Management did not provide a response

#### **Auditor General's Position**

- 1.1.14.8 In the absence of a response, we maintain our finding and recommendations. We will follow up on the implementation of our recommendations during subsequent audit.
- 1.1.14.9 Management is therefore in breach of financial discipline in keeping with the Public financial Management Act of 2009 as amended and restated 2019

# 1.1.15 Revenue and Expense Ledgers

## **Observation**

1.1.15.1 Financial Management Regulations C.8 Responsibilities of Accounting Officers (1) A head of a government agency or spending unit shall be personally and pecuniary responsible to Legislature for the use of funds under their control. (2) 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. (3) Without limiting the generality of sub regulation (1) and (2), a head of agency or spending unit shall: (a) ensure that the agency's accounting system has been approved by the Minister in consultation with the Auditor- General (b) manage and operate the agency's accounting systems, so as to ensure the accountability of all officers transacting such business and facilitate the efficient discharge of such business; (c) secure the efficient and effective use of appropriations under agency control in compliance with any enactment, regulations or instructions issued under the authority of any enactment; (d) secure the due and proper collection of government revenue collectable by the Agency within the terms of any enactment or of instructions issued or approved by the Minister; (e) bring promptly to account as revenue any cash found in his charge in excess of the balances in the cash book; (f) make good any deficiency in cash for which he is responsible; (g) ensure that all books of accounts under his or her control are correctly posted and kept up-to-date; (h) produce, when required by the Minister of Finance, the Comptroller-General, head of internal audit or Auditor-General or by such officers as may be authorized by any of the above, all cash, books, records, vouchers or other items of value in his or her charge (i) establish an effective internal audit function and the operation of an audit committee



1.1.15.2 During the audit, we observed that Management did not make available the following accounting records: revenue and expense ledgers, trial balances and general ledger, etc.

#### Risk

- 1.1.15.3 The completeness and accuracy of expenditure may not be assured; therefore, the financial statements may be misstated.
- 1.1.15.4 Management may not fully account for activities of the entity.

#### Recommendation

- 1.1.15.5 Management should ensure that detailed general ledgers are prepared to support figures mentioned in the expenditure report. Periodic reconciliation should be performed between the general ledger and the financial statements. Differences identified should be investigated and adjusted (where applicable) in a timely manner.
- 1.1.15.6 Management should procure and operationalize a functional accounting software to record all financial transactions of the entity.
- 1.1.15.7 An automated control should be established such that transactions (along with supporting documents) posted by a junior staff must be reviewed and approved by senior personnel before the transactions appear in the general ledger. Going forward, an automated linkage should be created between the general ledger, trial balance and the financial statements to facilitate completeness and accuracy of the financial statements

## Management' Response

1.1.15.8 Management did not provide a response

## **Auditor General's Position**

- 1.1.15.9 In the absence of a response, we maintain our finding and recommendations. We will follow up on the implementation of our recommendations during subsequent audit.
- 1.1.15.10 Management is therefore in breach of financial discipline in keeping with the Public financial Management Act of 2009 as amended and restated 2019

#### 1.2 Control and Administrative Issues

## 1.2.1 Irregularities noted with Fixed Assets

## **Observation**

1.2.1.1 The PFM Regulation V.4 states the Master Inventory of Furniture, Equipment, Vehicles, etc. (1) Furniture, and equipment issued for Government quarters or offices or vehicle and other fixed asset shall be brought on a master inventory of the Government Agency. (2) The master inventory shall record under each category of item: (a) the date and other details of the voucher or other document on which the items were received or issued; (b) their serial



numbers where appropriate; and (c) their distribution to individual locations and the total quantity held. (3) In respect of each individual location, there shall be made two copies of the inventory showing all items held at the location; one copy of the inventory shall be kept with the master inventory and the other copy at the location. (4) The dates and other details of all receipts and issue of items to or from the location shall be recorded on both copies of the inventory as they occur. (5) The initial entries and all other entries made later on both copies of the inventory shall be validated by the signature of the officer having the use of the items, or where there is more than one officer, the most senior of them.

- 1.2.1.2 During the audit we observed the following irregularities with the entity's fixed assets management system:
  - there was no evidence of an approved policy on the purchase, management and disposal of assets
  - several assets could not be verified nor physically identified
  - several fixed assets were not coded
  - several assets could not be found in the register (**Annexure A**); and
  - there was no evidence of assets movement log.
- 1.2.1.3 Assets donated to the entity and recorded in the register did not have any values attached.

#### Risk

- 1.2.1.4 Fixed Assets Register may be misstated (Over/understated).
- 1.2.1.5 Assets may be damaged or impaired but their values are still on the books.
- 1.2.1.6 Fixed assets may be removed from the entity's premises without authorization, misappropriation, subjected to personal use or theft.
- 1.2.1.7 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.

#### Recommendation

- 1.2.1.8 Management should ensure that the fixed assets register is updated to reflect the following: description, class, code, location, condition, cost, depreciation expense, accumulated depreciation and net book value of the asset.
- Management should conduct periodic fixed assets count and /or verification to determine 1.2.1.9 the current condition and location of the assets. Evidence of physical verification should be adequately documented and filed to facilitate future review.
- 1.2.1.10 The Fixed Assets Register should be updated periodically to reflect all entity's assets.
- 1.2.1.11 Fixed assets within a particular vicinity should be clearly displayed as required by the PFM Regulation.



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

## **Management's Response**

1.2.1.13 Management did not provide a response

#### **Auditor General's Position**

- 1.2.1.14 In the absence of a response, we maintain our finding and recommendations. We will follow up on the implementation of our recommendations during subsequent audit.
- 1.2.1.15 Management is therefore in breach of financial discipline in keeping with the Public financial Management Act of 2009 as amended and restated 2019

#### 1.2.2 Lack of Policies and Procedures

#### **Observation**

- 1.2.2.1 Regulation A.15(1) of the PFM Act of 2009 as restated in 2019 states: "The head of government agency must exercise all reasonable care to prevent and detect unauthorized, irregular, fruitless and wasteful expenditure, and must for this purpose implement clearly defined business processes, identify risk associated with these processes and institute effective internal control to mitigate these risks.
- 1.2.2.2 The Committee of Sponsoring Organizations of the Treadway Commission (COSO) Internal control framework on control activities states: "Institutions deploy control activities through policies that establish what is expected and procedures that put policies into action". Policies and procedures are established and implemented to help ensure that risk responses are effectively carried out with in an entity.
- 1.2.2.3 During the audit, we observed that Management did not develop various policies to guide its operations. There was no evidence of approved policy for the following:
  - Strategic and Operational Plan
  - Financial and Administrative Manual
  - Human Resource Manual
  - Risk Management Policy
  - ICT Security

#### Risk

1.2.2.4 Failure to develop policies and procedures to guide the activities of the entity may lead to arbitrary decisions that may be non-compliant to applicable laws and regulations and may impair the achievement of the entity's objectives.

### Recommendation

1.2.2.5 Management should develop, approve and operationalize policies and procedures for the various functions identified above, for the effective and efficient operations of the entity.



Auditor General's Report on the Compliance Audit of the Liberia Land Authority (LLA) for the fiscal period ended June 30, 2021

1.2.2.6 Evidence of approved policies and procedures should be adequately documented and filed to facilitate future review.

# **Management's Response**

1.2.2.7 Management did not provide a response

#### **Auditor General's Position**

- 1.2.2.8 In the absence of a response, we maintain our finding and recommendations. We will follow up on the implementation of our recommendations during subsequent audit.
- Management is therefore in breach of financial discipline in keeping with the Public financial 1.2.2.9 Management Act of 2009 as amended and restated 2019



# **ANNEXURES**

Annexure A: Asset not Traceable to Fixed Assets Registry

DATE	VH. No	Description	Payee	Bank	USD
		Procurement of Office Supplies			
		and Equipment for the	United Office		
		Chairman and Vice Chair's	Supplies &		
7/2/2020	PV-07-002	Offices	Equipment	GLOBAL	2,821.42
		The Procurement of Printer			
		from United Office Supplies &	United Office		
		Equipment for the production	Supplies &		
7/10/2020	PV- 07-011	of new Land Deeds	Equipment	GLOBAL	3,332.00
		Payment for LLA office	United Office		
		Furniture for use by the	Supplies &		
8/11/2020	PV-08-047	Technical Assistant to ED office	Equipment	GLOBAL	441.00
10/30/2020	PV-08-047	Payment for 3 split units	Razouk brothers	GLOBAL	1,249.00
8/4/2020	PV-08-004	3 laptops for chairman office	Razouk brothers	GLOBAL	1,425.90
		Payment for Laptop for the			
7/29/2020	PV-07-022	Vice Chair office	Office Ideas	GLOBAL	1,421.00
		Payment for one (1) desk mini			
		executive office chair for use			
8/7/2020	PV-08-009	by Chairman's office	Office Ideas	GLOBAL	480.20
		Payment represent the			
		procurement of one Laptop for			
5/21/2021	PV-05-028	IT staff	Office Ideas	CBL	1,406.30
Subtotal					12,576.82

# Annexure B: No evidence of withholdings remitted to LRA

DATE	VH. No	Description	Payee	Bank	US\$	L\$
		Procurement				
		of Office				
		Supplies and				
		Equipment				
		for the				
		Chairman				
		and Vice	United Office			
		Chair's	Supplies &			
2-Jul-20	PV-07-002	Offices	Equipment	GLOBAL	2,821.42	-
		Payment for				
		Fuel for LLA				
	PV- 07-	250KVA				
9-Jul-20	009	Generator	Super Petroleum	GLOBAL	288.39	-
		The	United Office			
	PV- 07-	Procurement	Supplies &			
10-Jul-20	011	of Printer	Equipment	GLOBAL	3,332.00	-



DATE	VH. No	Description	Payee	Bank	US\$	L\$
		from United				
		Office				
		Supplies &				
		Equipment				
		for the				
		production of				
		new Land				
		Deeds				
		Procurement				
		of Janitorial	Saksouk			
14-Jul-20	PV-07-013	materials	Shopping Center	GLOBAL	335.55	-
		Payment for				
		three laptops				
		for the office	RAZZOUK			
		of the	BROTHRES			
4-Aug-20	PV-08-004	chairman	TRADING	GLOBAL	1,425.90	-
		Payment for				
		replenishmen				
		t bath room	Boima Charles			
9-Dec-20	PV-12-01	water	Kiadii	GLOBAL	-	45,000.00
		Payment for				
		two days				
		lunch for				
		19persons for				
		the review of	Aliance			
		the SOP on	Hospitality			
5-Aug-20	PV-08-006	deeds form.	Group	GLOBAL	382.00	-
		Payment for				
		one (1) desk				
		mini				
		executive				
		office chair				
		for use by				
7.4 20	DV 00 000	Chairman's	000 11	CLODAL	400.20	
7-Aug-20	PV-08-009	office	Office Ideas	GLOBAL	480.20	-
		Payment to				
		dismantle				
		service , gas				
		and ,install				
		LLA air conditioners				
		for its offices				
		on Ashmun	Melvin Modern			
20-Aug-20	PV-08-032	Street	Refrigeration	GLOBAL	700.00	
20-Aug-20	r v-00-032	Supply of	Master Trading	GLODAL	700.00	-
25-Aug-20	PV-08-038	Vehicle tyres	Center	GLOBAL	441.00	_
		-				
8/31/2020	PV-08-044	Payment for	United Office	GLOBAL	441.00	

DATE	VH. No	Description	Payee	Bank	US\$	L\$
		LLA office	Supplies &			-
		Furniture for	Equipment			
		use by the				
		Technical				
		Assistant to				
		ED office				
		Payment for				
		20gallons of				
10/9/2020	PV-10-021	fuel for LLA	George Kollie	GLOBAL	350.00	-
		Payment				
		represents				
		the				
		replenishmen				
		t of the				
10/22/202		lavatory	Boima Charles			
0	PV-10-036	water fund	Kiadii	GLOBAL	250.00	-
		Replenishme	Boima Charles			
4/13/2021	PV-04-014	nt of water	Kiadii	CBL	353.00	
		Payment for				
		three laptops				
		for the office	RAZZOUK			
		of the	BROTHRES			
4-Aug-20	PV-08-004	chairman	TRADING	GLOBAL	1,425.90	-
		Payment for				
		Laptop for				
		the Vice				
7/29/2020	PV-07-022	Chair office	Office Ideas	GLOBAL	1,421.00	
		payment for				
		materials &				
		cleaning				
		waste from				
		various				
		restrooms to				
11/25/202		stop the				
0	PV-11-026	overflowing	George Kollie	GLOBAL	250.00	-
11/20/202		Payment for	Afrique Printing			
0	PV-11-024	the	Services	GLOBAL	735.00	-
Total					15,432.36	45,000.00

# **ANNEXURE C DSAs NOT RETIRED**

DATE	VH. No	Description	Payee	Bank	US\$	L\$
		Payment				
		representing DSA				
		for five days to				
		attend land dispute				
12/15/2020	PV-12-022	case in Rivercess	Junior Kolubah	GLOBAL	554.00	



DATE	VH. No	Description	Payee	Bank	US\$	L\$
		Pmt for trip to				
11/4/2020	PV-11-007	Nimba County	Kola Jackson	GLOBAL	250.00	
Payment						
		representing DSA				
		for five days to				
		attend land dispute	J. Josephus			
12/15/2020	PV-12-020	case in Rivercess	Burgess Sr	GLOBAL	375.00	
		Payment represents				
		Fuel & DSA for				
		Three days field				
		visit to forestry				
		Training Institute				
10/15/2020	DV 10 000	(FTI) \$ 157.5*rate)	John D. Nimosha	CLODAL		21022.0
10/15/2020	PV-10-009	@197.05	John B. Nimely	GLOBAL		31033.8
		Payment representing DSA				
		for five days to				
		attend land dispute				
12/15/2020	PV-12-021	case in Rivercess	Mahmud Solomon	GLOBAL	250.00	
		Payment				
		representing DSA				
		for five days to				
		attend land dispute				
12/15/2020	PV-12-022	case in Rivercess	Junior Kolubah	GLOBAL	554.00	
10/15/2020	10/15/2020 PV-10-007 Field trip for FTI		Sylvester Bundoo	GLOBAL	-	10,837.20
11/4/2020 PV-11-007 Trip to Nimba		L. Kula Jackson	GLOBAL	250.00		
Total					2,233.00	41,871.00

# ANNEXURE D: BUSINESS WITHOUT VALID TAX CLEARANCE AND BUSINESS REGISTRATION

DATE	VH. No	Description	Payee	US\$	L\$
		The Procurement of			
		Printer from United Office			
		Supplies & Equipment for			
		the production of new	United Office Supplies		
10-Jul-20	PV- 07-011	Land Deeds	& Equipment	3,332.00	-
		Payment for three laptops			
		for the office of the	RAZZOUK BROTHRES		
4-Aug-20	PV-08-004	chairman	TRADING	1,425.90	-
		Payment for LLA office			
		Furniture for use by the			
		Technical Assistant to ED	United Office Supplies		
8/31/2020	PV-08-044	office	& Equipment	441.00	-
		Payment for Vehicle Tires			
		for the commissioner of			
		land policy and planning			
11/4/2020	PV-11-008	vehicle	Auto Care Centre	784.00	-



DATE	VH. No	Description	Payee	US\$	L\$
		payment for materials &			
		cleaning waste from			
		various restrooms to stop			
11/25/2020	PV-11-026	the overflowing	George Kollie	250.00	-
		final 50% payment for			
		uninstalling service &			
		installing of air			
		conditioners from mamba			
		point to Ashmun street	Melvin Modern		
11/25/2020	PV-11-028	offices	Refrigerator	700.00	-
		Payment for			
		replenishment of			
12/9/2020	PV-12-001	bathroom water fund	Boima Charles Kiadii	-	45,000.00
Subtotal				6,932.90	45,000.00

