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Franklin Township Clermont County 981 Hopewell Road Felicity, Ohio 45120

#### To the Board of Trustees:

As you are aware, the Auditor of State's Office (AOS) must modify the *Independent Accountants' Report* we provide on your financial statements due to an interpretation from the American Institute of Certified Public Accountants (AICPA). While AOS does not legally require your government to prepare financial statements pursuant to Generally Accepted Accounting Principles (GAAP), the AICPA interpretation requires auditors to formally acknowledge that you did not prepare your financial statements in accordance with GAAP. Our Report includes an adverse opinion relating to GAAP presentation and measurement requirements, but does not imply the amounts the statements present are misstated under the non-GAAP basis you follow. The AOS report also includes an opinion on the financial statements you prepared using the cash basis and financial statement format the AOS permits.

Mary Taylor, CPA Auditor of State

Mary Taylor

September 24, 2009

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#### INDEPENDENT ACCOUNTANTS' REPORT

Franklin Township Clermont County 981 Hopewell Road Felicity, Ohio 45120

#### To the Board of Trustees:

We have audited the accompanying financial statements of Franklin Township, Clermont County, Ohio (the Township), as of and for the years ended December 31, 2008 and 2007. These financial statements are the responsibility of the Township's management. Our responsibility is to express an opinion on these financial statements based on our audit.

We conducted our audit in accordance with auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in the Comptroller General of the United States' *Government Auditing Standards*. Those standards require that we plan and perform the audit to reasonably assure whether the financial statements are free of material misstatement. An audit includes examining, on a test basis, evidence supporting the amounts and disclosures in the financial statements. An audit also includes assessing the accounting principles used and significant estimates made by management, as well as evaluating the overall financial statement presentation. The Township processes its financial transactions with the Auditor of State's Uniform Accounting Network (UAN). *Government Auditing Standards* considers this service to impair the independence of the Auditor of State to audit the Township because the Auditor of State designed, developed, implemented, and as requested, operates UAN. However, *Government Auditing Standards* permits the Auditor of State to audit and opine on this entity, because Ohio Revised Code § 117.101 requires the Auditor of State to provide UAN services, and Ohio Revised Code §§ 117.11(B) and 115.56 mandate the Auditor of State to audit Ohio governments. We believe our audit provides a reasonable basis for our opinion.

As described more fully in Note 1, the Township has prepared these financial statements using accounting practices the Auditor of State prescribes or permits. These practices differ from accounting principles generally accepted in the United States of America (GAAP). Although we cannot reasonably determine the effects on the financial statements of the variances between these regulatory accounting practices and GAAP, we presume they are material.

Instead of the combined funds the accompanying financial statements present, GAAP require presenting entity wide statements and also presenting the Township's larger (i.e. major) funds separately. While the Township does not follow GAAP, generally accepted auditing standards requires us to include the following paragraph if the statements do not substantially conform to GAAP presentation requirements. The Auditor of State permits, but does not require townships to reformat their statements. The Township has elected not to follow GAAP statement formatting requirements. The following paragraph does not imply the amounts reported are materially misstated under the accounting basis the Auditor of State permits. Our opinion on the fair presentation of the amounts reported pursuant to its non-GAAP basis is in the second following paragraph.

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Franklin Township Clermont County Independent Accountants' Report Page 2

In our opinion, because of the effects of the matter discussed in the preceding two paragraphs, the financial statements referred to above for the years ended December 31, 2008 and 2007 do not present fairly, in conformity with accounting principles generally accepted in the United States of America, the financial position of the Township as of December 31, 2008 and 2007, or its changes in financial position for the years then ended.

Also, in our opinion, the financial statements referred to above present fairly, in all material respects, the combined fund cash balances of Franklin Township, Clermont County, as of December 31, 2008 and 2007, and its combined cash receipts and disbursements for the years then ended on the accounting basis Note 1 describes.

The Township has not presented Management's Discussion and Analysis, which accounting principles generally accepted in the United States of America has determined is necessary to supplement, although not required to be part of, the financial statements.

In accordance with *Government Auditing Standards*, we have also issued our report dated September 24, 2009, on our consideration of the Township's internal control over financial reporting and our tests of its compliance with certain provisions of laws, regulations, contracts and grant agreements and other matters. While we did not opine on the internal control over financial reporting or on compliance, that report describes the scope of our testing of internal control over financial reporting and compliance, and the results of that testing. That report is an integral part of an audit performed in accordance with *Government Auditing Standards*. You should read it in conjunction with this report in assessing the results of our audit.

Mary Taylor, CPA Auditor of State

Mary Taylor

September 24, 2009

## COMBINED STATEMENT OF CASH RECEIPTS, CASH DISBURSEMENTS, AND CHANGES IN FUND CASH BALANCES ALL GOVERNMENTAL FUND TYPES FOR THE YEAR ENDED DECEMBER 31, 2008

		Special		Totals (Memorandum
	General	Revenue	Permanent	Only)
Cash Receipts:				
Property and Other Local Taxes	\$41,997	\$404,530	\$0	\$446,527
Charges for Services	0	118,536	0	118,536
Licenses, Permits, and Fees	21,403	3,076	0	24,479
Integovernmental	58,231	142,498	0	200,729
Earnings on Investments	355	1,750	0	2,105
Miscellaneous	576	34,902	0	35,478
Total Cash Receipts	122,562	705,292	0	827,854
Cash Disbursements:				
Current:				
General Government	142,629	5,904	0	148,533
Public Safety	0	469,183	0	469,183
Public Works	0	147,940	0	147,940
Health	76,230	980	0	77,210
Capital Outlay	3,140	7,300	0	10,440
Debt Service:	0.46	0	0	0.46
Redemption of Principal Interest and Other Fiscal Charges	946 460	0	0	946 460
interest and Other Fiscal Charges	400	<u> </u>		400
Total Cash Disbursements	223,405	631,307	0	854,712
Total Receipts Over/(Under) Disbursements	(100,843)	73,985	0	(26,858)
Other Financing Receipts:				
Note Proceeds	69,243	0	0	69,243
Total Other Financing Receipts	69,243	0	0	69,243
Excess of Cash Receipts and Other Financing Receipts Over / (Under) Cash Disbursements				
and Other Financing Disbursements	(31,600)	73,985	0	42,385
Fund Cash Balances, January 1	51,831	507,643	6,500	565,974
Fund Cash Balances, December 31	\$20.231	\$581.628	\$6.500	\$608.359

The notes to the financial statements are an integral part of this statement.

## COMBINED STATEMENT OF CASH RECEIPTS, CASH DISBURSEMENTS, AND CHANGES IN FUND CASH BALANCES ALL GOVERNMENTAL FUND TYPES FOR THE YEAR ENDED DECEMBER 31, 2007

	General	Special Revenue	Capital Projects	Permanent	Totals (Memorandum Only)
Cash Receipts:					
Property and Other Local Taxes	\$37,697	\$382,713	\$0	\$0	\$420,410
Charges for Services	0	98,335	0	0	98,335
Licenses, Permits, and Fees	15,867	4,560	0	0	20,427
Intergovernmental	75,618	148,292	0	39	223,949
Earnings on Investments	862	2,509	19,848	0	23,219
Miscellaneous	2,214	6,037	0	0	8,251
Total Cash Receipts	132,258	642,446	19,848	\$39	794,591
Cash Disbursements: Current: General Government Public Safety Public Works Health Capital Outlay  Total Cash Disbursements	122,722 0 4,534 31,526 1,500	3,810 478,307 123,792 1,974 16,353	0 0 0 0 19,848	0 0 0 39 0	126,532 478,307 128,326 33,539 37,701
Total Gash Disbursements	100,202	024,200	10,040		004,400
Total Receipts Over/(Under) Disbursements	(28,024)	18,210	0	0	(9,814)
Fund Cash Balances, January 1	79,855	489,433	0	6,500	575,788
Fund Cash Balances, December 31	\$51,831	\$507,643	<u>\$0</u>	\$6,500	\$565,974

The notes to the financial statements are an integral part of this statement.

#### NOTES TO THE FINANCIAL STATEMENTS DECEMBER 31, 2008 AND 2007

#### 1. Summary of Significant Accounting Policies

#### A. Description of the Entity

The constitution and laws of the State of Ohio establish the rights and privileges of the Franklin Township, Clermont County, Ohio (the Township), as a body corporate and politic. A publicly-elected three-member Board of Trustees directs the Township. The Township provides road and bridge maintenance, cemetery maintenance, fire protection and emergency medical services. The Township contracts with the Felicity-Franklin Fire District to provide fire services.

The Township's management believes these financial statements present all activities for which the Township is financially accountable.

#### **B.** Accounting Basis

These financial statements follow the accounting basis the Auditor of State prescribes or permits. This basis is similar to the cash receipts and disbursements accounting basis. The Township recognizes receipts when received in cash rather than when earned, and recognizes disbursements when paid rather than when a liability is incurred. Budgetary presentations report budgetary expenditures when a commitment is made (i.e., when an encumbrance is approved).

These statements include adequate disclosure of material matters, as the Auditor of State prescribes or permits.

#### C. Cash Deposits

The Township pools their funds, which are deposited in a checking account at a local bank.

#### D. Fund Accounting

The Township uses fund accounting to segregate cash deposits that are restricted as to use. The Township classifies its funds into the following types:

#### 1. General Fund

The General Fund reports all financial resources except those required to be accounted for in another fund.

#### 2. Special Revenue Funds

These funds account for proceeds from specific sources (other than from private-purpose trusts or for capital projects) that are restricted to expenditure for specific purposes. The Township had the following significant Special Revenue Funds:

<u>Fire District Fund</u> - This fund receives taxes and intergovernmental money for fire services.

<u>Life Squad Fund</u> - This fund receives taxes and intergovernmental money to pay for emergency medical services.

#### NOTES TO THE FINANCIAL STATEMENTS DECEMBER 31, 2008 AND 2007 (Continued)

#### 1. Summary of Significant Accounting Policies (Continued)

#### 3. Capital Project Funds

These funds account for receipts restricted to acquiring or constructing major capital projects (except those financed through enterprise or trust funds). The Township had the following significant capital project funds.

<u>Life Squad</u> - The Township received a grant from the State of Ohio for a Life Squad building.

#### 4. Permanent Funds

These funds account for assets held under a trust agreement that are legally restricted to the extent that only earnings, not principal, are available to support the Township's programs. The Township had the following significant permanent fund:

<u>Felicity Cemetery Fund</u> – This fund receives interest earned on the nonexpendable corpus from a trust agreement. These earnings are used for the general maintenance and upkeep of the Township's cemetery.

<u>Chilo Cemetery Fund</u> - This fund receives interest earned on the nonexpendable corpus from a trust agreement. These earnings are used for the general maintenance and upkeep of the Township's cemetery.

#### E. Budgetary Process

The Ohio Revised Code requires that each fund be budgeted annually.

#### 1. Appropriations

Budgetary expenditures (that is, disbursements and encumbrances) may not exceed appropriations at the fund, function or object level of control, and appropriations may not exceed estimated resources. The Board of Trustees must annually approve appropriation measures and subsequent amendments. The County Budget Commission must also approve the annual appropriation measure. Appropriations lapse at year end.

#### 2. Estimated Resources

Estimated resources include estimates of cash to be received (budgeted receipts) plus cash as of January 1. The County Budget Commission must also approve estimated resources.

#### 3. Encumbrances

The Ohio Revised Code requires the Township to reserve (encumber) appropriations when individual commitments are made. Encumbrances outstanding at year end are carried over, and need not be reappropriated. The Township did not encumber all commitments required by Ohio law.

A summary of 2008 and 2007 budgetary activity appears in Note 3.

#### NOTES TO THE FINANCIAL STATEMENTS DECEMBER 31, 2008 AND 2007 (Continued)

#### 1. Summary of Significant Accounting Policies (Continued)

#### F. Property, Plant, and Equipment

The Township records disbursements for acquisitions of property, plant, and equipment when paid. The accompanying financial statements do not report these items as assets.

#### 2. Equity in Pooled Deposits

The Township maintains a deposit pool all funds use. The Ohio Revised Code prescribes allowable deposits and investments. The carrying amount of deposits at December 31 was as follows:

	2008	2007
Demand deposits	\$608,359	\$565,974

**Deposits:** Deposits are insured by the Federal Depository Insurance Corporation; or collateralized by the financial institution's public entity deposit pool.

#### 3. Budgetary Activity

Budgetary activity for the years ending December 31, 2008 and 2007 follows:

2008 Budgeted vs. Actual Receipts

	Budgeted	Actual	_
Fund Type	Receipts	Receipts	Variance
General	\$191,790	\$191,805	\$15
Special Revenue	698,383	705,292	6,909
Permanent	38	0	(38)
Total	\$890,211	\$897,097	\$6,886

2008 Budgeted vs. Actual Budgetary Basis Expenditures

	Appropriation	Budgetary	
Fund Type	Authority	Expenditures	Variance
General	\$243,622	\$223,405	\$20,217
Special Revenue	1,206,026	631,307	574,719
Permanent	5,231	0	5,231
Total	\$1,307	\$854,712	\$600,167

2007 Budgeted vs. Actual Receipts

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	Budgeted	Actual		
Fund Type	Receipts	Receipts	Variance	
General	\$132,176	\$132,258	\$82	
Special Revenue	637,959	642,446	4,487	
Capital Projects	13,349	19,848	6,499	
Permanent	38	39	1	
Total	\$783,522	\$794,591	\$11,069	

#### NOTES TO THE FINANCIAL STATEMENTS DECEMBER 31, 2008 AND 2007 (Continued)

#### 3. Budgetary Activity (Continued)

2007 Budgeted vs. Actual Budgetary Basis Expenditures
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	Appropriation	Budgetary	
Fund Type	Authority	Expenditures	Variance
General	\$212,031	\$160,282	\$51,749
Special Revenue	1,091,193	624,236	466,957
Capital Projects	19,848	19,848	0
Permanent	6,539	39	6,500
Total	\$1,329,611	\$804,405	\$525,206

#### 4. Property Tax

Real property taxes become a lien on January 1 preceding the October 1 date for which the Trustees adopted tax rates. The State Board of Tax Equalization adjusts these rates for inflation. Property taxes are also reduced for applicable homestead and rollback deductions. The financial statements include homestead and rollback amounts the State pays as Intergovernmental Receipts. Payments are due to the County by December 31. If the property owner elects to pay semiannually, the first half is due December 31. The second half payment is due the following June 20.

Public utilities are also taxed on personal and real property located within the Township

Tangible personal property tax is assessed by the property owners, who must file a list of such property to the County by each April 30.

The County is responsible for assessing property, and for billing, collecting, and distributing all property taxes on behalf of the Township.

#### 5. Debt

Debt outstanding at December 31, 2008 was as follows:

	Principal	Interest Rate
Master Lease Purchase Agreement - Walking Path	\$30,193	4%
Master Lease Purchase Agreement - Cemetery	38,104	4%
Total	\$68,297	

The Township entered into two lease purchase agreements; one to improve Chilo Cemetery, the other to create a walking path for the Township.

#### NOTES TO THE FINANCIAL STATEMENTS DECEMBER 31, 2008 AND 2007 (Continued)

#### 5. Debt (Continued)

Amortization of the above debt, including interest, is scheduled as follows:

Voor anding December 24.	Cemetery (Principal and	Walking Trail (Principal and
Year ending December 31:	Interest)	Interest)
2009	\$4,706	\$3,729
2010	4,706	3,729
2011	4,706	3,729
2012	4,706	3,729
2013	25,184	19,956
Total	\$44,007	\$34,871

#### 6. Retirement Systems

Retirement Rates	Year	Member	Employer
		Rate	Rate
PERS – Local	2007	9.5%	13.85%
PERS – Local	2008	10%	14%

Township employees belong to the Ohio Public Employees Retirement System (OPERS). OPERS is cost-sharing, multiple-employer plan. The Ohio Revised Code prescribes this plan's benefits, which include postretirement healthcare and survivor and disability benefits.

For 2008 and 2007, OPERS members contributed 10 and 9.5%, respectively, of their gross salaries and the Township contributed an amount equaling 14% and 13.85%, respectively, of participants' gross salaries. The Township has paid all contributions required through December 31, 2008.

#### 7. Risk Management

#### **Risk Pool Membership**

The Government belongs to the Ohio Government Risk Management Plan (the "Plan"), a non-assessable, unincorporated non-profit association providing a formalized, jointly administered self-insurance risk management program and other administrative services to over 550 Ohio governments ("Members").

Pursuant to Section 2744.081 of the Ohio Revised Code, the Plan is a separate legal entity. The Plan provides property, liability, errors and omissions, law enforcement, automobile, excess liability, crime, surety and bond, inland marine and other coverages, modified for each Member's needs. The Plan pays judgments, settlements and other expenses resulting from covered claims that exceed the Member's deductible.

The Plan issues its own policies and reinsures the Plan with A- VII or better rated carriers, except the Plan retains the lesser of 15% or \$37,500 of casualty losses and the lesser of 10% or \$100,000 of property losses. Individual Members are only responsible for their self-retention (deductible) amounts, which vary from member to member.

#### NOTES TO THE FINANCIAL STATEMENTS DECEMBER 31, 2008 AND 2007 (Continued)

#### 7. Risk Management (Continued)

Plan members are responsible to notify the Plan of their intent to renew coverage by their renewal date. If a member chooses not to renew with the Plan, they have no other financial obligation to the Plan, but still need to promptly notify the Plan of any potential claims occurring during their membership period. The former member's covered claims, which occurred during their membership period, remain the responsibility of the Plan.

Settlement amounts did not exceed insurance coverage for the past three fiscal years.

The Pool's audited financial statements conform with generally accepted accounting principles, and reported the following assets, liabilities and retained earnings at December 31: 2007 and 2006 (the latest information available):

	2007	<u>2006</u>
Assets	\$11,136,455	\$9,620,148
Liabilities	(4,273,553)	(3,329,620)
Members' Equity	\$6,862,902	\$6,290,528

You can read the complete audited financial statements for The Ohio Government Risk Management Plan at the Plan's website, <a href="https://www.ohioplan.org">www.ohioplan.org</a>.



## INDEPENDENT ACCOUNTANTS' REPORT ON INTERNAL CONTROL OVER FINANCIAL REPORTING AND ON COMPLIANCE AND OTHER MATTERS REQUIRED BY GOVERNMENT AUDITING STANDARDS

Franklin Township Clermont County 981 Hopewell Road Felicity, Ohio 45120

To the Township Board of Trustees:

We have audited the financial statements of the Franklin Township, Clermont County, Ohio (the Township), as of and for the years ended December 31, 2008 and 2007, and have issued our report thereon dated September 24, 2009, wherein we noted the Township followed accounting practices the Auditor of State Prescribes rather than accounting principles generally accepted in the United States of America. We also noted the Township uses the Auditor of State's Uniform Accounting Network (UAN) to process its financial transactions. *Government Auditing Standards* considers this service to impair the Auditor of State's independence to audit the Township. However, *Government Auditing Standards* permits the Auditor of State to audit and opine on this entity, because Ohio Revised Code § 117.101 requires the Auditor of State to provide UAN services, and Ohio Revised Code §§ 117.11(B) and 115.56 mandate the Auditor of State to audit Ohio governments. We conducted our audit in accordance with auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in the Comptroller General of the United States' *Government Auditing Standards*.

#### Internal Control over Financial Reporting

In planning and performing our audit, we considered the Township's internal control over financial reporting as a basis for designing our audit procedures for expressing our opinion on the financial statements, but not to opine on the effectiveness of the Township's internal control over financial reporting. Accordingly, we have not opined on the effectiveness of the Township's internal control over financial reporting.

Our consideration of internal control over financial reporting was for the limited purpose described in the preceding paragraph and would not necessarily identify all deficiencies in internal control over financial reporting that might be significant deficiencies or material weaknesses. However, as discussed below, we identified a certain deficiency in internal control over financial reporting that we consider a significant deficiency.

A control deficiency exists when the design or operation of a control does not allow management or employees, in performing their assigned functions, to prevent or detect misstatements on a timely basis. A significant deficiency is a control deficiency, or combination of control deficiencies, that adversely affects the Township's ability to initiate, authorize, record, process, or report financial data reliably in accordance with its applicable accounting basis, such that there is more than a remote likelihood that the Township's internal control will not prevent or detect a more-than-inconsequential financial statement misstatement.

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Franklin Township Clermont County Independent Accountants' Report on Internal Control Over Financial Reporting and on Compliance and Other Matters Required by *Government Auditing Standards* Page 2

We consider finding 2008-001 described in the accompanying schedule of findings to be a significant deficiency in internal control over financial reporting.

A material weakness is a significant deficiency, or combination of significant deficiencies resulting in more than a remote likelihood that the Township's internal control will not prevent or detect a material financial statement misstatement.

Our consideration of the internal control over financial reporting was for the limited purpose described in the first paragraph of this section and would not necessarily identify all deficiencies in the internal control that might be significant deficiencies and accordingly, would not necessarily disclose all significant deficiencies that are also material weaknesses. We believe the significant deficiency described above is also a material weakness.

#### **Compliance and Other Matters**

As part of reasonably assuring whether the Township's financial statements are free of material misstatement, we tested its compliance with certain provisions of laws, regulations, contracts, and grant agreements, noncompliance with which could directly and materially affect the determination of financial statement amounts. However, providing an opinion on compliance with those provisions was not an objective of our audit and accordingly, we do not express an opinion. The results of our tests disclosed an instance of noncompliance or other matters we must report under *Government Auditing Standards* which is described in the accompanying schedule of findings as item 2008-001.

We also note certain noncompliance or other matters not requiring inclusion in this report that we reported to the Township's management in a separate letter dated September 24, 2009.

We intend this report solely for the information and use of the management and Board of Trustees. We intend it for no one other than these specified parties.

Mary Taylor, CPA Auditor of State

Mary Taylor

September 24, 2009

#### SCHEDULE OF FINDINGS DECEMBER 31, 2008 AND 2007

## FINDINGS RELATED TO THE FINANCIAL STATEMENTS REQUIRED TO BE REPORTED IN ACCORDANCE WITH GAGAS

#### **FINDING NUMBER 2008-001**

#### **Noncompliance Citation/Material Weakness**

**Ohio Admin. Code, Section 117-2-01(D),** states that when designing the public office's system of internal control and the specific control activities, management should consider the following:

- Ensure that all transactions are properly authorized in accordance with management's policies.
- Ensure that accounting records are properly designed.
- Verify the existence and valuation of assets and liabilities and periodically reconcile them to the accounting records.
- Perform analytical procedures to determine the reasonableness of financial data.
- Ensure the collection and compilation of the data needed for the timely preparation of financial statements.

The Township lacked management oversight in the proper recording of various transactions. The Township incorrectly posted:

#### Reclassifications

			Classified	Reclassified		
Fund	Description	Year	in Error as	as	Amount	
General	Debt Principal and Interest Payment	2008	General Government	Debt - Principle	\$ 2	210
	Debt i filicipal and interest i ayment	2008	General Government	Debt - Interest	1	01
General	Debt Principal and Interest Payment	2008	Health	Debt - Principle	7	'36
	Debt Frincipal and interest Fayment	2008	Health	Debt - Interest	3	359
General	Note Proceeds	2008	Other Financing Source	Sale of Notes	69,2	43
EMS	EMS Run charges	2008	License, Permits, & Fees	Charges for Services	118,1	16
		2007	License, Permits, & Fees	Charges for Services	98,3	35

#### **Adjustments**

				Classified	Reclassified		
	Fund	Description	Year	in Error as	as	Amount	
From	Zoning	EMS Run charges	2008	License, Permits, & Fees	Charges for Services	\$	420
To	EMS	LIVIS Ruit Charges					420
From	EMS	Zoning Fees	2008	License, Permits, & Fees	License, Permits, & Fees		150
То	Zoning	Zoring rees					150

Franklin Township Clermont County Schedule of Findings Page 2

## FINDING NUMBER 2008-001 (continued)

These errors resulted in the annual report being incorrect. The financial statements and, where applicable, accounting records have been adjusted to reflect these adjustments and reclassifications. The proper classification of transactions can help demonstrate legal compliance, financial accountability, and to provide management with proper information for decision making. We recommend the fiscal officer review the chart of accounts per the Township Handbook to ensure that transactions are properly coded, are properly posted to the ledgers, and properly reflected on the annual report. Additionally, management should periodically review detailed financial reports to determine accuracy and to ensure proper procedures are followed by the fiscal officer.

#### Officials' Response:

We did not receive a response from officials regarding this finding.



#### **FRANKLIN TOWNSHIP**

#### **CLERMONT COUNTY**

#### **CLERK'S CERTIFICATION**

This is a true and correct copy of the report which is required to be filed in the Office of the Auditor of State pursuant to Section 117.26, Revised Code, and which is filed in Columbus, Ohio.

**CLERK OF THE BUREAU** 

Susan Babbitt

CERTIFIED OCTOBER 19, 2009