



OHIO AUDITOR OF STATE  
**KEITH FABER**





# OHIO AUDITOR OF STATE KEITH FABER



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## INDEPENDENT ACCOUNTANT'S REPORT ON APPLYING AGREED-UPON PROCEDURES

City of Circleville – Pickaway Township Joint Economic Development District  
Pickaway County  
133 S. court Street  
Circleville, Ohio 43113

We have performed the procedures enumerated below on the City of Circleville-Pickaway Township Joint Economic Development District's (the District) receipts, disbursements and balances recorded in the cash basis accounting records for the years ended December 31, 2022 and 2021 and certain compliance requirements related to those transactions and balances, included in the information provided to us by the management of the District. The District is responsible for the receipts, disbursements and balances recorded in the cash basis accounting records for the years ended December 31, 2022 and 2021 and certain compliance requirements related to these transactions and balances included in the information provided to us by the District.

The Board of Trustees and the management of the District have agreed to and acknowledged that the procedures performed are appropriate to meet the intended purpose of providing assistance in the evaluation of the District's receipts, disbursements and balances recorded in their cash-basis accounting records for the years ended December 31, 2022 and 2021, and certain compliance requirements related to these transactions and balances. No other party acknowledged the appropriateness of the procedures. This report may not be suitable for any other purpose. The procedures performed may not address all the items of interest to a user of the report and may not meet the needs of all users of the report and, as such, users are responsible for determining whether the procedures performed are appropriate for their purposes. The sufficiency of the procedures is solely the responsibility of the parties specified in the report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

For the purposes of performing these procedures, this report only describes exceptions exceeding \$10.

The procedures and the associated findings are as follows:

### Cash

1. The City of Circleville is custodian for the District's deposits and therefore the City's deposit and investment pool holds the District's assets. We compared the District's fund balances reported on its December 31, 2022 Audit Trail by Account report to the balances reported in the City of Circleville's accounting records. The amounts agreed.
2. We agreed the January 1, 2021 beginning fund balance recorded in the Account Transaction Ledger report to the December 31, 2020 balance in the prior year documentation in the prior year Agreed-Upon Procedures working papers. We found no exceptions. We also agreed the January 1, 2022 beginning fund balance recorded in the Account Transaction Ledger report to the December 31, 2021 balance in the Account Transaction Ledger report. We found no exceptions.

**Income Taxes**

1. We obtained and inspected the District contract, observing the City is the Income Tax Administrator for the District and is required to record the Township’s portion of the income taxes collected in the District Income Tax fund and the City’s portion of the income taxes collected into the City’s general fund. We found no exceptions.
2. We inspected the testing of the District income tax collections made by RITA as performed during the City’s 2022 audit to determine the completeness of total District collections. We found no exceptions.
3. We inspected the City’s recording of the District income tax collections made by RITA as performed during the City’s 2022 audit to determine if:
  - a. these receipts were properly allocated by the City to the City’s General and the District Income Tax funds. We found no exceptions.
  - b. the receipts were recorded in the proper year. We found no exceptions.
4. We agreed the total amount of the District income tax collections to the tax revenue amount reported on the District financial statements as submitted in the Hinkle system. The amounts agreed.
5. As required by Section 10 of the Agreement, we inspected the City’s Account Transaction Ledger report for the District Income Tax fund for 2022 and 2021 to confirm it included all required receipts from the City for subsequent disbursement to the Township. We found no exceptions.

**Debt**

1. The prior agreed-upon procedures documentation disclosed no debt outstanding as of December 31, 2020.
2. We inquired of management and inspected the Audit Trail by Account Revenue report and Audit Trail by Expense report for evidence of debt issued during 2022 or 2021 or debt payment activity during 2022 or 2021. We identified no new debt issuances, nor any debt payment activity during 2022 or 2021.

**Non-Payroll Cash Disbursements**

1. We selected 10 disbursements from the Audit Trail by Expense report for the year ended December 31, 2022 and 10 from the year ended 2021 and determined whether:
  - a. The disbursements were for a proper public purpose. We identified one check totaling \$31.45 for an advertisement unrelated to the District’s activities. This disbursement was not considered a proper public purpose.
  - b. The check number, date, payee name and amount recorded on the returned, canceled check agreed to the check number, date, payee name and amount recorded in the Audit Trail by Account Expense report and to the names and amounts on the supporting invoices. We found no exceptions.
  - c. The payment was posted to a fund consistent with the restricted purpose for which the fund’s cash can be used. We found no exceptions.

### **Compliance – Bylaws**

We confirmed the District income taxes collected were disbursed 8% to Pickaway Township and 4% to the City of Circleville as required by section 10 of the District by-laws. For the year ending December 31, 2022 the District distributed to the City and Township \$29,556 and \$58,980, respectively, rather than \$28,194 and \$56,388, respectively, as required in the by-laws. This error resulted in over-funding to the city of \$1,362 and to the township of \$2,592.

For the year ending December 31, 2021 the District distributed to the City and Township \$24,572 and \$49,144, respectively, rather than \$23,818 and \$47,636, respectively as required in the by-laws. This error resulted in over-funding to the city of \$754 and to the township of \$1,509.

### **Sunshine Law Compliance**

1. We obtained and inspected the District's Public Records Policy to determine the policy was in accordance with Ohio Rev. Code §§ 149.43(E)(2) and 149.43(B)(7)(c) and did not limit the number of responses that may be made to a particular person, limit the number of responses during a specified period of time, or establish a fixed period of time before it will respond unless that period is less than eight hours. We found no exceptions.
2. We inquired with District management and determined the District did not have any completed, denied or redacted public records requests during the engagement period.
3. We inquired whether the District had a records retention schedule and observed that it was readily available to the public as required by Ohio Rev. Code § 149.43(B)(2). We found no exceptions.
4. We inspected written evidence that the Public Records Policy was provided to the records custodian/manager as required by Ohio Rev. Code § 149.43(E)(2). We found no exceptions.
5. We inquired with District management and determined the District did not have a policy manual during the engagement period therefore the public records policy could not be included as required by Ohio Rev. Code § 149.43(E)(2).
6. We observed that the District's poster describing their Public Records Policy was displayed conspicuously in all branches of the District as required by Ohio Rev. Code § 149.43(E)(2). We found no exceptions.
7. We inquired with District management and determined the District did not have any applications for record disposal submitted to the Records Commission during the engagement period.
8. We inquired with District management and determined the District did not have any elected officials subject to the Public Records Training requirements during the engagement period as required by Ohio Rev. Code §§ 149.43(E)(1) and 109.43(B).
9. We inspected the public notices for the public meetings held during the engagement period to determine if the District notified the general public and news media of when and where meetings during the engagement period were to be held as required by Ohio Rev. Code § 121.22(F). We found that the District did not notify the general public and news media of when and where meetings were to be held for 3 out of the 6 meetings held during the engagement period.

10. We inspected the minutes of public meetings during the engagement period in accordance with Ohio Rev. Code § 121.22(C) and determined whether they were:
  - a. Prepared – a file is created following the date of the meeting
  - b. Filed – placed with similar documents in an organized manner
  - c. Maintained - retained, at a minimum, for the engagement period
  - d. Open to public inspection – available for public viewing or request.

We found no exceptions.

11. We inspected the minutes from the engagement period in accordance with Ohio Rev. Code § 121.22(G) and determined the following:
  - a. Executive sessions were only held at regular or special meetings.
  - b. The purpose for the meetings and going into an executive session (when applicable) correlated with one of the matters listed in Ohio Rev. Code § 121.22(G).
  - c. Formal governing board actions were adopted in open meetings.

We found no exceptions.

#### **Other Compliance**

1. Ohio Rev. Code § 117.38 requires districts to file their financial information in the HINKLE system within 60 days after the close of the fiscal year. This statute also permits the Auditor of State to extend the deadline for filing a financial report and establish terms and conditions for any such extension. Auditor of State established policies, regarding the filing of complete financial statements, as defined in AOS Bulletin 2015-007 in the Hinkle System. We confirmed the District filed their complete financial statements, as defined by AOS Bulletin 2015-007 and Auditor of State established policy within the allotted timeframe for the years ended December 31, 2022 and 2021 in the Hinkle system. We found no exceptions.

We were engaged by the District to perform this agreed-upon procedures engagement and conducted our engagement in accordance with the attestation standards established by the AICPA and the Comptroller General of the United States’ *Government Auditing Standards*. We were not engaged to, and did not conduct an examination or review engagement, the objective of which would be the expression of an opinion or conclusion, respectively, on the District’s receipts, disbursements, balances and compliance with certain laws and regulations. Accordingly, we do not express an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

We are required to be independent of the District and to meet our ethical responsibilities, in accordance with the ethical requirements established by the Comptroller General of the United States’ *Government Auditing Standards* related to our agreed upon procedures engagement.



Keith Faber  
Auditor of State  
Columbus, Ohio

August 3, 2023

# OHIO AUDITOR OF STATE KEITH FABER



**CITY OF CIRCLEVILLE-PICKAWAY TOWNSHIP JOINT ECONOMIC DEVELOPMENT DISTRICT  
PICKAWAY COUNTY**

## **AUDITOR OF STATE OF OHIO CERTIFICATION**

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



**Certified for Release 8/22/2023**

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This report is a matter of public record and is available online at  
[www.ohioauditor.gov](http://www.ohioauditor.gov)