



June 21, 2019

Chris Murray, City Manager  
City of Toronto  
Toronto City Hall, East Tower, 11<sup>th</sup> floor.  
100 Queen Street West  
Toronto, ON M5H 2N2

Re: Office of the Lobbyist Registrar for the City of Toronto  
Report on the Results of Applying Specified Auditing Procedures to Financial Information Other Than  
Financial Statements for the Year Ended December 31, 2018.

To Toronto City Council:

This letter has been prepared at the request of Toronto City Council to obtain assurance that expenditures incurred by the Office of the Lobbyist Registrar for the City of Toronto (LR) are in compliance with the applicable policies and procedures, including appropriate exercise of delegated authorities as set by the City of Toronto.

We have performed the auditing procedures as described below. This agreed-upon procedures engagement was performed in accordance with standards published by Chartered Professional Accountants of Canada. The sufficiency of these policies, procedures and delegated authorities is solely the responsibility of the City of Toronto. Consequently, we make no representation regarding the sufficiency of the City of Toronto policies, procedures and delegated authorities described below.

For the purpose of this letter, the financial information to which the auditing procedures were applied was included within the City of Toronto SAP report, "Actual Cost Line Items for Cost Centres for the Year Ending 2018" for the LR. This report is essentially a General Ledger detailing the transactions that have been posted under the cost elements which in turn comprise the scope of the transactions subject to audit. The report was provided directly to us by staff of the City Clerks' Office.

To clarify, the Quotation Request identified the following Cost Elements to be tested; those elements are summarized on the following pages.



<p><b>SALARIES AND BENEFITS</b></p> <ul style="list-style-type: none"> <li>• 1025 – Permanent – Overtime</li> <li>• 1050 – Permanent – Vacation Pay</li> </ul> <p><b>MATERIALS AND SUPPLIS</b></p> <ul style="list-style-type: none"> <li>• 2010 - Stationery and Office Supplies</li> <li>• 2020 - Books and Magazine Subscriptions</li> <li>• 2040 - Paper &amp; Print Supplies</li> <li>• 2080 - Photographic &amp; Video Supplies</li> <li>• 2082 – Health and Safety Supplies</li> <li>• 2090 - Graphic Design Supplies</li> <li>• 2099 - Other Office Materials/Minor Furnishings</li> <li>• 2260 - Gasoline</li> <li>• 2570 - Janitorial Supplies</li> <li>• 2610 - Kitchen Supplies</li> <li>• 2650 - Computer and Printer Supplies</li> <li>• 2670 – Uniforms*</li> <li>• 2710 - General Hardware</li> <li>• 2741 - Food Cost</li> <li>• 2790 - Presentation/Promotional Items</li> <li>• 2791 – Ribbons, Medals &amp; Trophies</li> <li>• 2999 - Miscellaneous Materials &amp; Supplies</li> </ul> <p><b>EQUIPMENT</b></p> <ul style="list-style-type: none"> <li>• 3020 - M &amp; E-Communications</li> <li>• 3030 - M &amp; E-Office</li> <li>• 3032 - M &amp; E-Photographic</li> <li>• 3033 - M &amp; E-Printing &amp; Binding</li> <li>• 3050 - M &amp; E–Kitchen</li> <li>• 3099 – General Equipment</li> <li>• 3310 – Furnishings</li> <li>• 3320 – Fixtures*</li> <li>• 3410 - Computers-Hardware</li> <li>• 3420 - Computers–Software</li> </ul> <p><b>SERVICES AND RENTS</b></p> <ul style="list-style-type: none"> <li>• 4010 - Professional Services - Legal</li> <li>• 4038 - Professional &amp; Technical Services (IT)</li> <li>• 4050 – Technical Services – Survey and Mapping</li> </ul>	<p><b>SERVICES AND RENTS (Con't)</b></p> <ul style="list-style-type: none"> <li>• 4310 - Training &amp; Development- External</li> <li>• 4340 - Tuition Fees</li> <li>• 4406 – Contracted Services – Office Equipment</li> <li>• 4407 – Contracted Services - Buildings</li> <li>• 4410 – Contracted Services – Electrical</li> <li>• 4414 - Advertising &amp; Promotion</li> <li>• 4415 – Contracted Services – Janitorial</li> <li>• 4416 - Transfer, Haulage &amp; Storage</li> <li>• 4424 - Contracted Services-General</li> <li>• 4435 – Contracted Services – Security Systems*</li> <li>• 4452 - Transportation-Taxis</li> <li>• 4465 - Contracted Services-Monitoring Systems</li> <li>• 4472 - Computer Hardware Maintenance and Support Services</li> <li>• 4473 – Managed Print Charges</li> <li>• 4474 - Computer Software Maintenance and Support Services</li> <li>• 4510 - Rental of Vehicles &amp; Equipment</li> <li>• 4515 - Rental of Office Equipment</li> <li>• 4530 - Rental of Property (Other than Office)</li> <li>• 4555 - Pager/Radio Rentals</li> <li>• 4590 - Rental-Other</li> <li>• 4699 – Repair &amp; Maintenance – Other</li> <li>• 4755 - Meal Allowances (Non-Travel)</li> <li>• 4760 - Membership Fees</li> <li>• 4770 - Parking Expenses (In town)</li> <li>• 4775 - Metrage-Operational (In town)</li> <li>• 4804 – Wireless Devices</li> <li>• 4805 - Postage</li> </ul>
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<ul style="list-style-type: none"> <li>• 4078 - Consulting Services-Technical</li> <li>• 4079 - Consulting Services-IT</li> <li>• 4082 - Photo/Video Services</li> <li>• 4086 - Tech. Services-Translations &amp; Interpreters</li> <li>• 4089 - Consulting Services - Management/Research and Development</li> <li>• 4091 - Consulting Services - External Lawyers and Planners</li> <li>• 4093 - Consulting Services - Creative Communications</li> <li>• 4110 – Honoraria</li> <li>• 4118 – Tickets</li> <li>• 4122 – Transcripts</li> <li>• 4130 - Process Server Fees</li> <li>• 4132 - Conduct Money</li> <li>• 4144 - Investigative Expenses</li> <li>• 4199 - Other Professional and Technical Services</li> <li>• 4205 - Business Travel-Kilometrage</li> <li>• 4210 - Business Travel-Accommodation</li> <li>• 4215 - Business Travel-Air Transportation</li> <li>• 4220 - Business Travel-Ground Transp.</li> <li>• 4225 - Business Travel-Public Transit</li> <li>• 4230 – Business Travel-Other Expenses</li> <li>• 4251 – Conferences/Seminars-Kilometrage</li> <li>• 4252 - Conferences/Seminars-Accommodation</li> <li>• 4253 - Conferences/Seminars-Air/Rail/Bus Travel</li> <li>• 4254 - Conferences/Seminars-Ground Transportation</li> <li>• 4255 - Conferences/Seminars-Other Expenses</li> <li>• 4256 - Conferences/Seminars-Registration Fees</li> </ul>	<ul style="list-style-type: none"> <li>• 4808 - Network Equipment, incl. Cabling</li> <li>• 4810 - Telephone</li> <li>• 4811 - Cellular Telephones</li> <li>• 4812 - Long Distance Phone Calls</li> <li>• 4813 - Internet</li> <li>• 4815 - Courier</li> <li>• 4820 - Business Meeting Expenses</li> <li>• 4822 - Receptions and Public Relations</li> <li>• 4825 - Printing and Reproduction - Third Parties</li> <li>• 4827 – Online Services Fee</li> <li>• 4985 – Cash Over / Under</li> <li>• 4995 - Other Expenses</li> </ul> <p>CAPITAL TRANSFERS &amp; OTHER EXPENDITURES</p> <ul style="list-style-type: none"> <li>• 6031 - Contribution Insurance Reserve Fund</li> <li>• 6570 – Bank Service Charges</li> </ul> <p>INTER-DIVISIONAL CHARGES</p> <ul style="list-style-type: none"> <li>• 7025 - IDC - Postage &amp; Courier</li> <li>• 7030 - IDC - Printing</li> <li>• 7035 - IDC – Copying</li> <li>• 7070 – IDC – Facilities Maintenance Services*</li> <li>• 7080 – IDC – Other Services</li> <li>• 7097 – IDC – EMS</li> <li>• 7130 - IDC - User Hardware &amp; Operational System Support</li> <li>• 7170 - IDC - Parks Services</li> </ul> <p>OTHER REVENUE</p> <ul style="list-style-type: none"> <li>• 9185 – Foreign Exchange – Gains or Losses</li> <li>• 9450 – Sundry Revenue*</li> <li>• 9457 – Trade A/P Discount Received</li> <li>• 9475 – Insurance Loss Recoveries*</li> </ul>
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We were provided directly from the City Clerk's Office, the Policy Applicability Matrix (Matrix) that linked each Cost Element above with the applicable City of Toronto policies and procedures below:

- Business Expense Policy
- Vacation
- Kilometrage Reimbursement for use of Personal Vehicle for City business
- Lieu time
- Training and Development
- Attendance Management
- Leave without pay
- Tuition Reimbursement
- Blanket Contract Procedures
- Divisional Purchase Orders (DPOs)
- Long Distance Telephone
- Payment Requisition Procedures
- Petty Cash Policy and Procedures (including Penny Elimination Policy)
- Purchasing Card (PCard) Program
- Selection and Hiring of Consulting Services
- Sole Source or Non-Competitive Procurement Procedures
- Using an Established Roster to Obtain Professional, Consultant or Other Services

To further clarify, the Quotation Request identified the delegated authorities as follows:

- Chapter 71, Financial Control
- Chapter 195, Purchasing
- Chapter 217, Records, Corporate (City)
- Chapter 257, Signing Authority (spending authority set at the level of a Division Head)

In addition, the Quotation Request identified the policy framework for the City's Accountability Officers, codified in the Toronto Municipal Code, Chapter 3, "Accountability Officers", which reinforces both their arms-length relationship to the City and their independent status within the City's governance system. As part of the implementation of Chapter 3, Accountability Officers are required to comply with all applicable City by-laws, policies and procedures while maintaining their balance between accountability and independence.

Copies of the above City of Toronto policies and procedures and web-links to the City of Toronto related delegated authorities were provided by the City Clerk's Office.

We selected a statistical sample of transactions to be tested based on the number of entries in each Cost Element and examined those transactions for compliance with the applicable policies and procedures of the Matrix, including appropriate exercise of delegated authorities with underlying supporting documents for adherence to the policies, procedures and delegated authorities noted above.

As a result of applying the above procedures, we found one exception to the adherence to the policies, procedures and delegated authorities as they applied to our test sample. The departure from the policy and the details relating to it are attached to this reports appendix.



It should be understood that we make no representations as to the sufficiency for your purposes of the procedures as described in the preceding paragraphs. Further we have addressed ourselves solely to the report, which we received directly from the City Clerk's Office of the City of Toronto and make no representations as to whether any material items were omitted. Our procedures do not constitute an audit of the report and therefore we express no opinion on the report.

This letter is provided solely for the purpose of determining compliance with the Section 3-8B of the City of Toronto's Municipal Code and should not be used for any other purpose.

Any use that a third party makes of this letter, or any reliance or decisions made based on it, are the responsibility of such third party. We accept no responsibility for loss or damages, if any, suffered by any third party as a result of decisions made or actions taken based on this letter.

Yours very truly,

**Robert Gore & Associates**  
Chartered Professional Accountants  
Licensed Public Accountants

1238 Kingston Road, Toronto, Ontario  
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## **Appendix**

In compliance with section 1.3 b. of the Quotation Request, the following are items set forth for the year ended December 31, 2018.

### **List of Annual Non-Competitive Procurement Activity**

The City Clerk's Office confirmed that for the year ended December 31, 2018, the following commitment to non-competitive procurement occurred.

<b>Cost Element</b>	<b>Vendor</b>	<b>PO#</b>	<b>Net Price</b>	<b>HST</b>	<b>Gross Total</b>	<b>Item Description</b>
4010	Redacted	3568268	\$15,000.00	\$1,950.00	\$16,950.00	Confidential legal services

Certain details have been redacted in the above table to comply with Section 181 of the City of Toronto Act in which the Duty of Confidentiality is defined.

### **List of Annual Consulting Services Expenditures**

During our engagement, we inquired with the City Clerk's Office regarding Annual Consulting Services Expenditures incurred by the Accountability Offices. The City Clerk's Office noted no transactions of this nature occurred

### **Departure from Policy**

As noted in our opinion, one instance of non-compliance with the policies of the City of Toronto was brought to our attention. Please see the attached memo for further details.



City Clerk's Office  
Kelly McCarthy, Deputy City Clerk  
Strategic Integration & Excellence

City Hall, 100 Queen Street West  
9th Floor West Tower  
Toronto, Ontario M5H 2N2

## Memorandum

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**Date:** March 6, 2019

**To:** Note to File

**From:** Kelly McCarthy, Deputy City Clerk, Strategic Integration and Excellence  
Cristina De Caprio, Lobbyist Registrar

**Re: Business Expense Policy Non-compliance – G. Gallagher**

The City Clerk's Office provides administrative support to the Office of the Lobbyist Registrar, which includes the processing of notifications of travel and travel claims in accordance with the City's Business Expenses Policy.

On November 21, 2018, the City Clerk's Office received a notification of travel for Cristina De Caprio to attend the 2018 Annual COGEL Conference in Philadelphia from December 9 to 12, 2018. The amount for this travel was estimated to be \$3,128.52. As submitted, the travel notification was in compliance with the Business Expenses Policy.

On December 6, 2018, the City Clerk's Office received a letter from the Lobbyist Registrar noting that she was no longer able to attend the conference due to a family matter, and that she would be sending Geoffrey Gallagher in her place. This memo is attached for reference.


The memo also noted that due to the last minute nature of this change, the cost for both travel and accommodations was higher than usual. The Office did comply with the requirement for three quotes for flights.

After the travel was undertaken, the City Clerk's Office realized that Geoffrey Gallagher's notification of travel form indicated that the cost of this conference was in excess of \$3,500. According to the City's business travel policy, conference travel over \$3,500 needs to be approved by Council.

This discrepancy was noticed only after travel had been undertaken, and the expense claim paperwork completed. It should also be noted that Council was not meeting in the time period where this travel decision was made, and therefore it would have been logistically impossible to seek Council approval in time for attendance at this conference to occur.

The City Clerk's Office and the Lobbyist Registrar have agreed to note this issue in the file along with this travel claim. This issue will be flagged and reported to City Council through the Lobbyist Registrar's annual compliance audit report to Council. The Lobbyist Registrar will speak to this issue at Council if deemed necessary.

The City Clerk's Office has reinforced this policy provision with its staff at all levels in order to ensure that this does not happen again. The Office of the Lobbyist Registrar also reviewed this policy provision with staff at all levels in order to ensure future compliance.



Kelly McCarthy  
Deputy City Clerk, Strategic Integration & Excellence, City Clerk's Office



Cristina De Caprio  
Lobbyist Registrar