



Dave Yost • Auditor of State



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Goshen Community Improvement Corporation
Clermont County
PO Box 262
Goshen, Ohio 45122

To the Board of Trustees:

We have completed certain procedures in accordance with Ohio Rev. Code Section 117.01(G) to the accounting records and related documents of the Goshen Community Improvement Corporation, Clermont County, Ohio (the Corporation) for the years ended December 31, 2014 and 2013.

Our procedures were designed solely to satisfy the audit requirements of Ohio Rev. Code § 117.11(A). Because our procedures were not designed to opine on the CIC's financial statements, we did not follow *generally accepted auditing standards*. We do not provide any assurance on the Corporation's financial statements, transactions or balances for the years ended December 31, 2014 and 2013.

The Corporation's management is responsible for preparing and maintaining its accounting records and related documents. Our responsibility under Ohio Rev. Code Section 117.11(A) is to examine, analyze and inspect these records and documents.

We obtained written representation from the governing Board that the Corporation provided all financial activity related to cash, assets, liabilities, revenues or expenses for audit for the years ended December 31, 2014 and 2013.

Based on the results of our procedures, we found one compliance issue to report.

Current Year Observations

1. **Ohio Rev. Code, § 1724.05**, states each community improvement corporation shall prepare an annual financial report that conforms to rules prescribed by the auditor of state pursuant to **§ 117.20** of the Ohio Rev. Code that is prepared according to generally accepted accounting principles and certified by the Board of Directors of the corporation or its Treasurer or other Chief Fiscal Officer to the best knowledge and belief of those persons certifying the report. The financial report shall be filed with the Auditor of State within one hundred twenty days following the last day of the corporation's fiscal year, unless the Auditor of State extends that deadline.

The Corporation did not file an annual report for 2014 or 2013 with the Auditor of State.

We recommend the Corporation file annual reports with the Auditor of State as required by the Ohio Rev. Code.

This matter was reported in the prior audit of the Corporation for 2012 and 2011.

Current Status of Matters we Reported in our Prior Engagement

2. In addition to the annual report matter reported in item 2 above, our prior audit report for the years ended December 31, 2013 and 2012 included a noncompliance and a control weakness matter reported as Finding 2012-001.

We noted in Finding 2012-001 that Representatives of the Goshen Community Improvement Corporation (GCIC) initially represented to the public and to Auditor of State that the entity had changed legal structure; however, representatives of the GCIC subsequently represented to the Auditor of State that the changes were in name only and had no effect on the corporation legal structure. Ultimately, GCIC representatives provided updated representations to the Auditor of State that the actions taken by the GCIC did not change the legal form of the entity from a community improvement corporation to a development corporation named Goshen Community Development Corporation (GCDC).

We also noted that according to the documentation at the Ohio Secretary of State and representations by the GCIC, the GCIC always has been and continues to be a public entity incorporated under Ohio Rev. Code § 1702 and is designated as a community improvement corporation under Ohio Rev. Code § 1724. The GCIC also continues under the same designation number assigned by the Office of the Ohio Secretary of State; and the entity's representatives have indicated the United States Internal Revenue Service 501(c)(3) designation previously secured for the GCIC remains effective for the GCDC.

Finally, we note that although the GCIC name was changed to GCDC (a development corporation) the board did not incorporate the Ohio Revised Code sections related to development corporations into the revised articles of incorporation. Community improvement corporations are organized under Ohio Rev. Code sections 1702 and 1724, and are considered public entities. Development corporations are incorporated under chapter 1726 and are not considered public entities.

We recommended that the Board of the Corporation take any steps necessary to confirm that the Corporation is organized and operating as a community improvement corporation, is subject to audit by the Auditor of State, and is in compliance with applicable public record and open meeting laws. We recommended that the Corporation transfer all property it possesses back into the name of the Community Improvement Corporation. We also recommended the Corporation adopt a public records policy and implement procedures to assure compliance with Ohio Public Records laws.

As of the date of the date of this report, the Corporation has not taken any official action to implement controls or achieve compliance with Ohio law in any of these areas.



Dave Yost
Auditor of State

Columbus, Ohio

September 1, 2015



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GOSHEN COUNTY COMMUNITY IMPROVEMENT CORPORATION

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.

Susan Babbitt

CLERK OF THE BUREAU

**CERTIFIED
SEPTEMBER 22, 2015**