

MICHAEL K. GLOVER

CERTIFIED PUBLIC ACCOUNTANT
(A Professional Accounting Corporation)

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Independent Accountant's Report On
Applying Agreed-Upon Procedures

September 15, 2018

To the Board of Directors
Louisiana Real Estate Appraisers Board
State of Louisiana
Baton Rouge, Louisiana

I have performed the procedures enumerated below as they are a required part of the engagement. I am required to perform each procedure and report the results, including any exceptions. Management is required to provide a corrective action plan that addresses all exceptions noted. For any procedures that do not apply, I have marked "not applicable."

Management of the Louisiana Real Estate Appraisers Board, a component unit of the State of Louisiana, is responsible for its financial records, establishing internal controls over financial reporting, and compliance with applicable laws and regulations. These procedures were agreed to by management of the Louisiana Real Estate Appraisers Board and the Legislative Auditor, State of Louisiana, solely to assist the users in assessing certain controls and in evaluating management's assertions about the Louisiana Real Estate Appraisers Board compliance with certain laws and regulations during the year ended June 30, 2018.

This agreed-upon procedures engagement was performed in accordance with attestation standards established by the American Institute of Certified Public Accountants and applicable standards of *Government Auditing Standards*. The sufficiency of these procedures is solely the responsibility of the specified users of this report. Consequently, I 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.

Written Policies and Procedures

1. Obtain and inspect the entity's written policies and procedures and observe that they address each of the following categories and subcategories, as applicable:
 - a) ***Budgeting***, including preparing, adopting, monitoring, and amending the budget.
 - b) ***Purchasing***, including (1) how purchases are initiated; (2) the preparation and approval process of purchase requisitions and purchase orders; (3) controls to ensure compliance with the public bid law or state purchasing rules and regulations; and (4) documentation required to be maintained for all bids and price quotes.
 - c) ***Disbursements***, including processing, reviewing, and approving.
 - d) ***Receipts***, including receiving, recording, and preparing deposits. Also, policies and procedures should include management's actions to determine the completeness of all collections for each type of revenue.
 - e) ***Payroll/Personnel***, including (1) payroll processing, and (2) reviewing and approving time and attendance records, including leave and overtime worked.
 - f) ***Contracting***, including (1) types of services requiring written contracts, (2) standard terms and conditions, (3) approval process, and (4) monitoring process.
 - g) ***Credit Cards (and debit cards, fuel cards, P-Cards, if applicable)***, including (1) how cards are to be controlled, (2) allowable business uses, (3) documentation requirements, (4) required approvers, and (5) monitoring card usage.

- h) Travel and expense reimbursement**, including (1) allowable expenses, (2) dollar thresholds by category of expense, (2) documentation requirements, (3) time-frame in which requests must be submitted and (4) required approvers.
- i) Ethics**, including (1) the prohibitions as defined in Louisiana Revised Statute 42:1111-1121, (2) actions to be taken if an ethics violation takes place, and (3) system to monitor possible ethics violations.
- j) Debt Service**, including (1) debt issuance approval, (2) continuing disclosure/EMMA reporting requirements, (3) debt reserve requirements, and (4) debt service requirements.

The appraisers board does not have policies and procedures that address financial reporting. The policies and procedures that were written by the State of Louisiana Department of Administration are being used by this entity and appear to be sufficient for their operations.

Annual Fiscal Report (AFR)

- 2. Obtain the financial statements from the AFR submitted to the Division of Administration's (DOA) Office of Statewide Reporting and Accounting Policy for the current and prior periods. Perform analytical procedures comparing current and prior period amounts, by line item. Report any variances of 10% or greater for line items that are 10% or more of the respective total assets/deferred outflows of resources, liabilities/deferred inflows of resources, net position, revenues, or expenses, and management's explanation of the variance.

Variances of 10% or greater are as follows:

- 1. Total assets have decreased by \$103,569 or 19%- this decrease was a result of an increase of legal fees.
- 2. Total liabilities have increased by \$842,326 or 2,256.6% - the increase was also caused by the increase of legal fees and a loan that also paid legal fees.
- 3. Expenses increased by \$1,086,971 or 235.4% due to the additional legal fees.

The variances noted above are due to litigation expenses that were incurred due to an ongoing litigation brought by the Federal Trade Commission. The client response to exception 2018-03 further explains this litigation.

Board (or Finance Committee, if applicable)

- 3. Obtain and inspect the board minutes for the fiscal period, as well as the board's enabling legislation, charter, bylaws, or equivalent document in effect during the fiscal period, and:
 - a) Observe that the board met with a quorum at least monthly, or on a frequency in accordance with the board's enabling legislation, charter, or other equivalent document.

The legislation requires the board to meet at least once each calendar quarter to conduct its business, this board met more often than required by legislation and each board meeting met with a quorum.
 - b) Observe that the minutes referenced or included monthly budget-to-actual comparisons.
 - If the budget-to-actual comparisons show that management was deficit spending during the fiscal period, observe there is a formal/written plan to eliminate the deficit spending for those entities with a fund balance deficit. If there is a formal/written plan, observe that the meeting minutes for at least one board meeting during the fiscal period reflect that the board is monitoring the plan.

The minutes of each board meeting include a reference to the budget-to-actual comparisons on the general fund.
 - c) Access the entity's online information included in the DOA's boards and commissions database (<https://www.cfprd.doa.louisiana.gov/boardsandcommissions/home.cfm>) and observe that the entity submitted board meeting minutes for all meetings during the fiscal period.

The entity's has submitted all board meeting minutes are included in the DOA's boards and commissions database,

Bank Reconciliations

4. Obtain a listing of bank accounts from management for the fiscal period and management's representation that the listing is complete.

A list of the client bank accounts was prepared by management.

5. For each of the bank accounts in the listing provided by management, obtain bank statements and reconciliations for all months in the fiscal period and observe that:

- a) Bank reconciliations include evidence that they were prepared within two months of the related statement closing date (e.g. initialed and dated, electronically logged);

Three of the twelve months reconciliation was not prepared until after 2 months of the closing date of the bank statement. See exception 2018-01

Bank reconciliations include evidence that a member of management or a board member who does not handle cash, post ledgers, or issue checks has reviewed each bank reconciliation (e.g. initialed and dated, electronically logged);

- b) Management has documentation reflecting that it has researched reconciling items that have been outstanding for more than 6 months at the statement closing date; and

There is no documentation that management has researched reconciled items that have been outstanding for more than 6 months. See exception 2018-02

- c) The reconciled balance for the final month of the fiscal period agrees to the general ledger.

The reconciled balance for the final month agrees with the general ledger balance at June 30, 2018.

Collections

6. Obtain and inspect written policies and procedures relating to employee job duties (if no written policies or procedures, inquire of employees about their job duties), and observe that job duties for collections are properly segregated such that:

- a) Each employee responsible for collecting cash is not responsible for preparing/making bank deposits, unless another employee/official is responsible for reconciling collection documentation (e.g. pre-numbered receipts or license applications received) to the deposit.

The same employee that is responsible for collecting cash also reconciles the bank account, post cash entries to the general ledger, and prepare deposits, however, the supervisor is responsible for reconciling postings to the general ledger.

- b) Each employee responsible for collecting cash is not responsible for posting collection entries to the general ledger, unless another employee/official is responsible for reconciling ledger postings to the deposit.

The same employee who is responsible for collecting cash also post the collection entries to the general ledger, however, the supervisor is responsible for reconciling postings to the general ledger.

- c) The employee(s) responsible for reconciling cash collections to the general ledger by revenue source is not responsible for collecting cash, unless another employee/official verifies the reconciliation.

The same employee that reconciles cash collection also collects cash; however, another employee verifies the reconciliation.

7. Select the highest (dollar) week of cash collections from the general ledger or other accounting records (e.g. cash collection log, daily revenue reports, receipt book, etc.) during the fiscal period. Obtain supporting documentation for each deposit made during the selected week and:

- Trace sequentially numbered receipts, system reports, and other related collection documentation to the deposit slip.

Receipts are not sequentially pre-numbered.

- Trace the deposit slip total to the actual deposit per the bank statement.
The deposit slip was traced to the actual deposit in the bank statement.
- Observe that the deposit was made within one business day of collection (within one week if the depository is more than 10 miles from the collection location or deposit is less than \$100).
The entity does not maintain records of when the deposit is actually received.
- Trace the actual deposit per the bank statement to the general ledger.
The actual deposit per the bank statement was traced to the general ledger.

8. Obtain and inspect written policies and procedures (if no written policies and procedures, inquire to management) and observe that there is a process performed to determine completeness of all collections, including electronic transfers, for each revenue source (e.g. periodic confirmation with outside parties, reconciliation of receipt number sequences, reasonableness of cash collections based on licenses issued) by a person who is not responsible for collections.

There are no written policies and procedures addressing collections; however, there is a process in place that does determine the completeness of all collections. These procedures are being performed by the same person that is responsible for collections then reviewed by the supervisor. Due to the limited number of the staff, this procedure appears adequate.

9. For licensing boards, obtain a list of initial and renewal licenses granted during the period from management and management's representation that the listing is complete. Randomly select 10 individual applicants from the listing and obtain the supporting documentation (e.g. application, copy of check) from management and:
- Observe that the fee paid for license was the appropriate fee based on the applicable fee schedule established by the board or statute.

If a penalty was assessed (e.g. late fee), observe that the penalty was assessed and collected in accordance with the board's policies.

10. For levee districts, obtain independent confirmation of the tax amounts received from the appropriate parish Sheriff's offices. Observe that the confirmed amount agrees to the amount deposited by levee district.

Not applicable

Credit Cards/Debit Cards/Fuel Cards/P-Cards

11. Obtain from management a listing of all active credit cards, bank debit cards, fuel cards, and P-cards (cards), including the card numbers and the names of the persons who maintained possession of the cards. Obtain management's representation that the listing is complete.

A list of all active credit cards was obtained from management. There are no bank debit cards, fuel cards, or P-cards possessed by the entity.

12. Using the listing prepared by management, randomly select five cards (all cards should be selected if the entity has less than five) that were used during the fiscal period. Obtain the monthly statements, or combined statements with the largest dollar activity for each card (for a debit card, select the monthly bank statement with the largest dollar amount of debit card purchases) and:

There were no charges on any of the three credit cards possessed by the entity for the fiscal year.

- a) Observe that there is evidence that the monthly statement or combined statement and supporting documentation (e.g. original receipts for credit/debit card purchases, exception reports for excessive fuel card usage) was reviewed and approved, in writing, by someone other than the authorized card holder.

Not applicable

- b) Observe that finance charges and/or late fees were not assessed on the selected statements.

Not applicable

13. Using the monthly statements or combined statements selected under #12 above, obtain supporting documentation for all transactions included on the monthly statements or combined statements for each of the five cards selected (i.e. each of the five cards should have one month of transactions subject to testing).

Not applicable

- a) For each transaction, observe that the transaction is supported by:

Not applicable

- An original itemized receipt (i.e., identifies precisely what was purchased)
- Written documentation of the business/public purpose.
- Documentation of the individuals participating in meals (for meal charges only).
- Other documentation that may be required by written policy (e.g., purchase order, written authorization.)

- b) For each transaction, compare the transaction's detail (nature of purchase, dollar amount of purchase, supporting documentation) to the entity's written purchasing/disbursement policies and the Louisiana Public Bid Law or Louisiana Procurement Code (i.e. transaction is a large or recurring purchase requiring the solicitation of bids or quotes), as applicable, and report any exceptions.

There were no charges on the credit cards for this entity during the fiscal year.

For each transaction, compare the entity's documentation of the business/public purpose to the requirements of Article 7, Section 14 of the Louisiana Constitution, which prohibits the loan, pledge, or donation of funds, credit, property, or things of value, and report any exceptions (e.g. cash advances or non-business purchases, regardless whether they are reimbursed). If the nature of the transaction precludes or obscures a comparison to the requirements of Article 7, Section 14, the practitioner should report the transaction as an exception.

Not applicable

Travel and Travel-Related Expense Reimbursement

14. Obtain from management a listing of all travel and related expense reimbursements, by person, during the fiscal period or, alternately, obtain the general ledger and sort/filter for travel reimbursements. Obtain management's representation that the listing or general ledger is complete.

Management provided me with the requested information

15. Obtain the entity's written policies related to travel and expense reimbursements. Compare the amounts in the policies to the per diem and mileage rates established by the state's travel rules and regulations (i.e. PPM 49) and report any rates that exceed the rates established by PPM49. Note: Report rates that exceed those established in PPM49 even if the entity has the legal authorization to establish its own rates.

The reimbursed rates used for travel expense were in compliance with the rates established by the state's travel rules and regulations.

16. Using the listing or general ledger from #14 above, select the three persons who incurred the most travel costs during the fiscal period. Obtain the expense reimbursement reports or prepaid expense documentation of each selected person, including the supporting documentation, and choose the largest travel expense for each person to review in detail. For each of the three travel expenses selected:

- a) Observe that each expense was reimbursed or prepaid in accordance with written policy (e.g., rates established for meals, mileage, lodging). If the entity does not have written policies, observe that each expense was reimbursed in accordance with the rates provided in PPM 49 rates (#15 above).

Each expense that was reimbursed was paid in accordance with the rates provided in PPM 49.

b) Observe that each expense is supported by:

- An original itemized receipt that identifies precisely what was purchased. [Note: An expense that is reimbursed based on an established per diem amount (e.g., meals) does not require a receipt.]

The original itemized receipt identifies the purchase.

- Documentation of the business/public purpose (Note: For meal charges, there should also be documentation of the individuals participating).

The business purpose was documented on the receipt.

- Other documentation as may be required by written policy (e.g., authorization for travel, conference brochure, certificate of attendance)

There is no other documentation required.

c) Compare the entity's documentation of the business/public purpose to the requirements of Article 7, Section 14 of the Louisiana Constitution, which prohibits the loan, pledge, or donation of funds, credit, property, or things of value, and report any exceptions (e.g. hotel stays that extend beyond conference periods or payment for the travel expenses of a spouse). If the nature of the transaction precludes or obscures a comparison to the requirements of Article 7, Section 14, the practitioner should report the transaction as an exception.

None of the transactions were for donations, loans, or pledges of public credit as addressed in Article 7, Section 14 of the Louisiana Constitution.

d) Observe the travel reimbursement request exceeding \$25.00 was submitted within 30 days following the travel in accordance with PPM 49.

Travel reimbursement request were submitted within 30 days following the travel in accordance with PPM 49.

e) Observe that each reimbursement was reviewed and approved, in writing, by someone other than the person receiving reimbursement.

Each reimbursement was reviewed and approved by someone other than the person receiving reimbursement.

Contracts

Obtain a listing of all agreements/contracts for professional services, materials, and supplies, leases, and construction activities that were in effect during the fiscal period or, alternately, obtain the general ledger and sort/filter for contract payments. Obtain management's representation that the listing or general ledger is complete.

Management provided me with the requested information

17. Using the listing above, randomly select the five contract "vendors" that were paid during the fiscal period (excluding purchases on state contract and excluding payments to the practitioner or the Louisiana Legislative Auditor). Obtain the related contracts and paid invoices and:

- a) Observe that there is a formal/written contract that supports the services arrangement and the amount paid.

Each of the service agreements were supported by written contracts.

- b) Observe that the contract was bid in accordance with the Louisiana Public Bid Law or Louisiana Procurement Code (e.g. solicited quotes or bids, advertised), if required by law.

None of the contracts listed by management required a bid.

- c) Observe that the contract was approved by the board, evidenced by board minutes or other contract documents, if required by policy.

It is not the policy of the governing board to approve the contracts.

- d) If the contract was amended, observe that the original contract terms provided for such an amendment.

None of the contracts were amended.

- e) Select the largest payment from each of the five contracts, obtain the supporting invoice, agree the invoice to the contract terms, and observe that the invoice and related payment agreed to the terms and conditions of the contract.

The supporting invoice agreed with the contract terms and the related payments included in the terms and conditions of the contract.

Payroll and Personnel

18. Obtain a listing of employees with their actual salaries paid during the period, and obtain management's representation that the listing is complete. Randomly select five employees, obtain their personnel files, and

There is only one employee for this agency.

- a) Agree actual paid salaries to the authorized salaries/pay rates in the personnel file.

The pay rate was authorized as indicated by information observed in the personnel file.

- b) Review changes made to hourly pay rates/salaries during the fiscal period and observe that those changes were approved in writing and in accordance with written policy.

19. Obtain attendance and leave records and randomly select one pay period during the fiscal period in which leave has been taken by at least one employee, and:

- a) Observe that all selected employees documented their daily attendance and leave (e.g., vacation, sick, compensatory).

The daily attendance and leave was documented for the employee selected.

- b) Observe that supervisors approved, electronically or in writing, the attendance and leave of the selected employees.

The supervisor approved the attendance and leave of the employee.

- c) Observe that any leave accrued or taken during the pay period is reflected in the entity's cumulative leave records.

The leave taken during the pay period selected was reflected on the entity's cumulative leave records.

20. Obtain from management a list of those employees that terminated during the fiscal period and management's representation that the list is complete. If applicable, select the two largest termination payments (e.g., vacation, sick, compensatory time) made during the fiscal period and, obtain related documentation of the hours and pay rates used in management's termination payment calculations, agree the hours to the employee cumulative leave records, and agree the pay rates to the employees' authorized pay rates in the employees' personnel files.

There was one employee that terminated during the year. The pay rate used to calculate the employees final payment agrees with the amount authorized as indicated in the employees personnel file.

Obtain management's representation that employer and employee portions of payroll taxes, retirement contributions, health insurance premiums, and workers' compensation premiums have been paid, and associated forms have been filed, by required deadlines.

Managements employer and employee portions of payroll taxes, retirement contributions, health insurance premiums and workers' compensation premiums has been paid and the associated forms have been filed by the required deadlines.

Non-Payroll Disbursements – Other General

21. Obtain a listing of entity disbursements from management or, alternately, obtain the general ledger and sort/filter all for all other entity disbursements that are not addressed in the sections above (credit card/debit card/travel card/P-card, travel and expense reimbursement, and contracts). Obtain management's representation that the listing or general ledger population is complete.

I obtained the general ledger and sorted/filtered all of the disbursements that were not addressed in any of the other above sections.

22. Using the listing or general ledger from #23 above, randomly select five disbursements. Obtain supporting documentation (e.g. purchase requisition, invoices, receipts, receiving slips) for each disbursement. For each of the five disbursements selected:

- a) Observe that each expense is supported by:

- An original itemized receipt or invoice that identifies precisely what was purchased.
The original invoice identifies the purchase.
- Documentation of the business/public purpose
The business purpose was documented on the receipt/invoice.
- Other documentation as may be required by written policy
No other documentation was required.

- b) Compare the entity's documentation of the business/public purpose to the requirements of Article 7, Section 14 of the Louisiana Constitution, which prohibits the loan, pledge, or donation of funds, credit, property, or things of value, and report any exceptions (e.g. purchases for items for personal use without a business/public purpose). If the nature of the transaction precludes or obscures a comparison to the requirements of Article 7, Section 14, the practitioner should report the transaction as an exception.

None of the transactions were for donations, loans, or pledges of public credit as addressed in Article 7, Section 14 of the Louisiana Constitution.

- c) Observe that each expense and related documentation was reviewed and approved, in writing, by someone other than the person who initiated the purchase.

Each expense and documentation was reviewed and approved by someone other than the person who initiated the purchase.

Ethics

23. Using the five selected employees from procedure #19 under "Payroll and Personnel" above, obtain ethics compliance documentation from management, and observe that the documentation demonstrates each employee completed one hour of ethics training during the fiscal period.

Each of the employees selected had documentation they had completed the required ethics training during the fiscal year.

24. Obtain a listing of board members from management. Randomly select five of the board members and observe whether the entity maintained documentation to demonstrate that required annual ethics training was completed.

Each of the board members selected had documentation to demonstrate their required annual ethics training was completed.

Budget

25. Obtain a copy of the legally adopted budget and all amendments.

A copy of the legally adopted budget and the amendment was obtained.

26. Trace the budget adoption and amendments to the minute book.

The budget adoption and amendment was traced to the minutes.

27. Compare the total revenues and total expenditures of the final budget to actual total revenues and total expenditures on the financial statements or AFR. Report variances of 10% or greater.

The revised budget for 2017-2018 reported expenditures of \$830,150 while the AFR reports the expenditure at \$1,1548,642; a difference of \$718,492 or 86.55%. The large variance was the increase of the legal fees.

Inquire of management whether the entity has updated its budget information in the DOA's boards and commissions database referred to in #3 above for the current fiscal period (i.e. period covered in these procedures). Access the online database and obtain the budget information for the current fiscal period. Observe that the budget information contained in the database agrees to the budget adopted by the entity's board.

The budget information in the DOA's board and commission database does not agree with the budget information for the current fiscal year. See exception 2018-04

Debt Service

28. If debt was issued during the fiscal period, obtain supporting documentation from the entity, and observe that State Bond Commission approval was obtained.

A list of a finance note that was obtained during the year was obtained and I observed that the State Bond Commission did not approve the loan before it was obtained. See exception 2018-3

29. If the entity had outstanding debt during the fiscal period, obtain supporting documentation from the entity and observe that the entity made scheduled debt service payments and maintained debt reserves, as required by debt covenants.

Not applicable

Other

30. Obtain a listing of misappropriations of public funds and assets during the fiscal period and management's representation that the listing is complete. Select all misappropriations on the listing, obtain supporting documentation, and observe that the entity reported the misappropriation(s) to the legislative auditor and the district attorney of the parish in which the entity is domiciled.

There were no misappropriations of public funds or assets during the fiscal year.

31. Inquire of management whether the entity contracted for audit or attest services other than these agreed-upon procedures during the current period. Report the type of audit or attest service (i.e. audit, review, agreed-upon procedures, etc.) contracted by management and the purpose or requirement for the additional audit or attest service.

Not applicable

Corrective Action

32. Obtain management's response and corrective action plan for any exceptions noted in the above agreed-upon procedures.

Current year exception and managements response are included on a separate page attached to this report.

I am not engaged to perform, and did not perform, an audit, the objective of which would be the expression of an opinion on management's assertions. Accordingly, I do not express such an opinion. Had I performed additional procedures, other matters might have come to my attention that would have been reported to you.

The purpose of this report is solely to describe the procedures performed and the results of those procedures to assist the users in assessing certain controls and management's assertions about compliance with laws and regulations, and not to provide an opinion on control or compliance. Accordingly, this report is not suitable for any other purpose. Under Louisiana Revised Statute 24:513, this report is distributed by the Legislative Auditor as a public document.



September 15, 2018
Michael K Glover APAC
Michael K Glover

Louisiana Real Estate Appraisers Board
Agreed-Upon Procedures Exceptions
For the year ended June 30, 2018

Current Year Exceptions:

2018-01 – Bank Reconciliations 5a

Exception – There were three months of bank reconciliations out of the twelve that were not prepared within 2 months of the statement's closing date.

Response – An employee in the accounting department turned in her resignations which caused the accounting department to be shorthanded. A new employee has been hired and trained and since then the bank reconciliations have been performed within a 2 month period from the date of the statement's closing date.

2018-02 – Bank Reconciliations 5b

Exception – There was no documentation reflecting that outstanding items on the bank reconciliation that are more than 6 months have been researched.

Response – We do not presently have a policy to review outstanding items on the bank reconciliation that are more than 6 months old. However, we will implement this policy for future reconciliations.

2018-03 Debt Service

Exception – The Appraisers Board obtained a loan in the amount of \$750,000 with a maturity date of June 2038, without the consent or approval of the State Bond Commission as required by R.S. 1410.60

Response – see separate response from management

2018-04 Budget 27

Exception – The information reported on the DOA's boards and commission database do not agree with the information included on the budget information for the current fiscal year.

Response – The revised budget was approved in July and the information on the boards and commission database will be updated soon.

Prior Year Exceptions – for the year ended June 30, 2017

None



JOHN BEL EDWARDS
GOVERNOR

State of Louisiana
LOUISIANA REAL ESTATE APPRAISERS BOARD

September 13, 2018

Mr. Michael K. Glover
9437 Brookline Ave.
Baton Rouge, La. 70809

Re: Response No. 2018-03

Dear Mr. Glover,

Per our earlier discussions regarding the above exception noted in your audit review of the Louisiana Real Estate Appraisers Board, the following response is provided:

- 1) The purpose of the loan subject to the requirements of R.S. 1410.60 as noted in your report exception was to pay litigation expenses incurred by the LREAB in ongoing litigation brought by the Federal Trade Commission.
- 2) Prior contract approval to engage outside legal counsel up to the amount of \$750,000 had been received from the Attorney General, Division of Administration, and Civil Service.
- 3) In contemplating the loan in question, I mistakenly applied the wrong statute in believing the LREAB could borrow funds based on anticipation of revenue under the general powers granted the Board.
- 4) A call was made to Bond Commission staff prior to entering into the loan agreement for clarification of the statute covering revenue anticipation borrowing which they correctly answered. Unfortunately, the term of the loan exceeding 90 days was not discussed.
- 5) Upon learning of this issue, I immediately notified you of the apparent error. I also notified the Chairman and Vice Chair of the LREAB, The lender (Gulf Coast Bank & Trust), and the Attorney General of this issue.
- 6) I have directed our legal counsel to complete a review of all statutes to make certain no future issues or potential violations may occur.
- 7) A follow up meeting is being scheduled with the Attorney General's office to complete a review of the facts and circumstances with a focus on identifying appropriate remedies.

The LREAB has annually contracted for an outside legislative audit review for the sole purpose of making certain we maintain compliance with all statutory requirements and have the necessary internal control procedures in place. Prior to the current exception, the LREAB has demonstrated 100% success in our commitment to fulfilling our role as a regulatory body in exemplary fashion, and will reinforce that commitment going forward.

Please also note that a comprehensive audit of LREAB was conducted in April 2018 by the Federal Appraisal Subcommittee. The audit confirmed 100% LREAB compliance with all federal and state requirements in regulating appraisal activity for Louisiana. Louisiana is now among a handful of states earning an "excellent" rating from the ASC.

Sincerely,

A handwritten signature in black ink, appearing to read "Bruce Unangst", followed by a long horizontal line extending to the right.

Bruce Unangst
Executive Director