Financial Statements with Supplementary Information

December 31, 2015

(With Independent Accountants' Review Report Thereon)

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CERTIFIED PUBLIC ACCOUNTANTS

Stephen M. Griffin, CPA Robert J. Furman, CPA

Independent Accountants' Review Report

Board of Commissioners Sewerage District No. 1 of the Parish of St. Tammany, State of Louisiana Covington, Louisiana

We have reviewed the accompanying financial statements of the business-type activities of Sewerage District No. 1 of the Parish of St. Tammany, State of Louisiana (the District), a component unit of the St. Tammany Parish Government, as of December 31, 2015 and for the year then ended, which collectively comprises the District's basic financial statements as listed in the table of contents. A review includes primarily applying analytical procedures to management's financial data and making inquiries of the management of the District. A review is substantially less in scope than an audit, the objective of which is the expression of an opinion regarding the financial statements taken as a whole. Accordingly, we do not express such an opinion.

The management of the District is responsible for the preparation and fair presentation of the financial statements in accordance with accounting principles generally accepted in the United States of America and for designing, implementing, and maintaining internal control relevant to the preparation and fair presentation of the financial statements.

Our responsibility is to conduct the review in accordance with Statements on Standards for Accounting and Review Services issued by the American Institute of Certified Public Accountants. Those standards require us to perform procedures to obtain limited assurance that there are no material modifications that should be made to the financial statements. We believe that the results of our procedures provide a reasonable basis for our report.

Based on our review, we are not aware of any material modifications that should be made to the accompanying financial statements in order for them to be in conformity with accounting principles generally accepted in the United States of America.

Management has omitted the management's discussion and analysis information that is required to be presented for purposes of additional analysis. Such missing information, although not a part of the basic financial statements, is required by the Governmental Accounting Standards Board, who considers it to be an essential part of financial reporting for placing the basic financial statement in an appropriate operational, economic, or historical context.

Our review was made primarily for the purpose of expressing a conclusion that there are no material modifications that should be made to the financial statements in order for them to be in conformity with accounting principles generally accepted in the United States of America. The supplementary information on pages 12 and 13 are presented for purposes of additional analysis. The supplementary information has not been subjected to the inquiry and analytical procedures applied in the review of the basic financial statements, but it has been compiled from information that is the representation of management. We have not audited or reviewed the supplementary information and accordingly, we do not express an opinion or provide any assurance on such supplementary information.

In accordance with the Louisiana Governmental Audit Guide and the provisions of state law, we have issued a report dated May 6, 2016, in the results of our agreed upon procedures.

Griffin & Furman, LLC

May 6, 2016

Statement of Net Position

December 31, 2015

Assets		
Cash and cash equivalents Certificates of deposit Revenues receivable - charges for services Accrued interest receivable Due from other governmental entity - St. Tammany Parish Waterworks	\$ 56,079 100,000 18,593 33 57,244	
Capital assets, net of accumulated depreciation	180,252	
	412,2	201
Liabilities	es	
Accounts payable	537	
Total liabilities	5	37
Net Position	ion	
Net invested in capital assets Unrestricted	180,252 	
	S 411,60	64

Statement of Revenues, Expenses, and Changes in Net Position

For the Year Ended December 31, 2015

Operating revenues:		
Charges for services		\$ 215,286
Operating expenses:		
Advertising	S 86	
Bank charges	8	
Board members' fees	2,820	
Bookkeeping	4.025	
Depreciation	14,998	
Fees	946	
Insurance	7,532	
Office supplies & expense	1,188	
Postage	698	
Professional services	7,539	
Repairs & maintenance	139,394	
Telephone	583	
Utilities	23,606	
Total operating expenses		 203,423
Operating income		11,863
Nonoperating income:		
Interest income	754	
Total nonoperating income		 754
Change in net position		12,617
Net position, beginning of year		399,047
Net position, end of year		\$ 411,664

Statement of Cash Flows

For the Year Ended December 31, 2015

Cash flows from operating activities				
Receipts from customers	\$	218,659		
Payments to suppliers for goods and services	100000	(189,595)	•	
Net cash provided by operating activities				29,064
Cash flows from non-capital financing activities				
Cash transferred to other governmental entity, net	500000	(9,524)	-	
Net cash used by non-capital financing activities				(9,524)
Cash flows from investing activities				
Purchase of fixed assets		(80,616)		
Redemption of certificate of deposit		61,125		
Interest received		754		
Net cash used in investing activities				(18,737)
Net increase in cash and cash equivalents				803
Cash and cash equivalents, beginning of year				55,276
Cash and cash equivalents, end of year			\$	56,079
Reconciliation of operating income to net cash				
used by operating activities				
Operating income	\$	11,863		
Adjustments to reconcile operating income to				
net cash provided by operating activities				
Depreciation		14,998		
Changes in assets and liabilities				
Decrease in receivables		3,373		
Decrease in accounts payable	Lansan	(1,170)	-	
Net cash provided by operating activities			\$	29,064

Notes to Financial Statements

December 31, 2015

(1) Summary of Significant Accounting Policies

(a) Introduction

Sewerage District No. 1 of the Parish of St. Tammany, State of Louisiana (the District) was created by the St. Tammany Parish Police Jury on October 27, 1960, pursuant to Louisiana Revised Statute 33:3885. The District has the authority to manage and operate sewerage systems within the District not served by municipal systems. The governing board is made up of five commissioners who serve four year terms. Four commissioners are appointed by the St. Tammany Parish Council and one is appointed by the Parish President. At December 31, 2015, the District had approximately 434 customers.

(b) **Basis of Presentation**

The accompanying basic financial statements of the District have been prepared in conformity with governmental accounting principles generally accepted in the United States of America. The Governmental Accounting Standards Board is the accepted standard-setting body for establishing governmental accounting and financial reporting principles.

(c) <u>Reporting Entity</u>

Governmental Accounting Standards Board Statement No. 14 established criteria for determining which component units should be considered part of an entity for reporting purposes. The basic criterion for including a potential component unit within the reporting entity is financial accountability. As such, the District has no component units under the criteria established.

The District is a component unit of St. Tammany Parish because the Council appoints all members of the governing board of the District and, as such is financially accountable for the District. The accompanying financial statements present information only on the funds maintained by the District and do not present information on the Parish, the general government services provided by that governmental unit, or the other governmental units that comprise the financial reporting entity.

(d) Fund Accounting

The District is organized and operated on a fund basis whereby a self-balancing set of accounts (Business-Type Activities) is maintained that comprises its assets, liabilities, fund equity, revenues, and expenses. All assets and liabilities (whether current or long term) associated with their activities are reported. Business type activities rely on fees and charges for support and operate in a manner similar to private sector enterprises.

(e) Measurement Focus and Basis of Accounting

Measurement focus is a term used to describe "which" transactions are recorded within the various financial statements. Basis of account refers to "when" transactions are recorded regardless of the measurement focus applied.

Notes to Financial Statements

December 31, 2015

Measurement Focus

The proprietary fund utilizes an "economic resources" measurement focus. The accounting objectives of this measurement focus are the determination of operating income, changes in net assets (or cost recovery), financial position, and cash flows. All assets and liabilities (whether current or long-term) associated with their activities are reported.

Basis of Accounting

The proprietary fund utilizes the accrual basis of accounting. Under the accrual basis of accounting, revenues are recognized when earned and expenses are recorded when the liability is incurred or the economic asset is used.

(f) Assets, Liabilities, and Net Assets

Cash and Cash Equivalents

For reporting purposes, cash and cash equivalents includes amounts in demand deposits, savings accounts, and certificates of deposit maturing in three months or less. Louisiana Revised Statutes allow the District to invest in time certificates of deposit of state banks organized under the laws of Louisiana, national banks having their principal office in the State of Louisiana, in savings accounts or shares of savings and loan associations and savings banks and in share accounts and share certificate accounts of federally or state chartered credit unions.

Receivables

Business-type activities report customer's utility service receivables as the major receivable. Uncollectible utility service receivables are recognized as bad debts through the establishment of an allowance account at the time information becomes available which would indicate the uncollectibility of the particular receivable. At December 31, 2015, there was no allowance deemed necessary for uncollectible receivables.

Capital Assets

Capital assets, which include property, plant, and equipment, are reported in the statement of net position. Capital assets are recorded at historical cost or estimated cost if historical cost is not available. Donated assets are recorded as capital assets at their estimated fair market value at the date of donation. Depreciation is provided over the assets' estimated useful lives using the straight-line method of depreciation.

Net Position

Net positon is consists of the following:

<u>Net invested in capital assets</u> - Capital assets net of accumulated depreciation and reduced by the outstanding balances of any bonds, mortgages, notes or other borrowings that are attributable to the acquisition, construction, or improvements constructed, or improvement of those assets.

Notes to Financial Statements

December 31, 2015

<u>Unrestricted net position</u> - All other net position that does not meet the definition of "restricted" or "net invested in capital assets"

(g) Use of Estimates in the Preparation of Financial Statements

The preparation of financial statements in conformity with accounting principles generally accepted in the United States of America requires management to make estimates and assumptions that affect the reported amounts of assets and liabilities and disclosure of contingent assets and liabilities at the date of the financial statements and the reported amounts of revenues and expenses during the reporting period. Actual results could differ from those estimates.

(2) <u>Cash</u>

At December 31, 2015, cash deposits with financial institutions consisted of the following:

Demand Deposits per Bank at three institutions	S	59,910
Secured by federal deposit insurance		(750,000)
Secured by collateralized pledge of securities		
Unsecured / uncollateralized	5	<u>82</u>

(3) Certificates of Deposit

At December 31, 2015, certificates of deposit with financial institutions having terms greater than three months consisted of the following:

Certificates of Deposit per Bank at three institutions	S	100,000
Secured by federal deposit insurance		(750,000)
Secured by collateralized pledge of securities	-	**
Unsecured / uncollateralized	5	int

(4) <u>Revenue Receivables – Charges for Services</u>

At December 31, 2015, revenues receivables – charges for service consisted of the following:

Charges for services	Ś	18,593
Allowance for doubtful accounts	*************	
	<u>s</u>	18,593

(5) Due from Other Governmental Entity – St. Tammany Parish Waterworks

As a matter of administrative convenience, customer billings of the District are included on water bills distributed to customers of St. Tammany Parish Water District No. 3 (District No. 3). As payments are received by District No 3, the receipts are recorded as a receivable from District No. 3 and funds are transferred as needed to fund operations or invest excess funds of the District. At December 31, 2015, the amount due from District No. 3 amounted to \$57,244.

Notes to Financial Statements

December 31, 2015

(6) <u>Capital Assets</u>

Capital assets and depreciation activity as of and for the year ended December 31, 2015 for the primary government is as follows:

	Balance January 1, 2015	Increases	Decreases	Balance December 31, 2015
		HELL CAUSES	37 t ti t 16003	
Capital Assets Not Being Depreciated Land	<u>s 19,967</u>	-		19,967
Capital Assets Being Depreciated				
Sewer System and Equipment	362,263	80,616		442,879
Total Capital Assets Being Depreciated	362,263	80.616	_	442.879
being Depreciated	JUMAAUJ	00,010		TTAAU 17
Less Accumulated Depreciation for: Sewer System and Equipment	(267,596)	(14,998)	-	(282,594)
Total Accumulated Depreciation	(267,596)	(14,998)	econstanonstanonstanonstanonstanonstanonstanonstanonstanonstanonstanonstanonstanonstanonstanonstanonstanonstano	(282,594)
Total Capital Assets Being Depreciated, Net	94,667	65,618	-	160,285
Total Business-Type Activities	<u>\$ 114.635</u>	65.618		180.252

The District recorded \$14,998 of depreciation expense on its capital assets for the year ended December 31, 2015.

(7) Litigation

At December 31, 2015, the District was not a defendant in any legal proceedings.

(8) Risk Management

The District is exposed to risks of loss in the areas of theft, torts, property hazards, general liability, errors and omissions, and natural causes. These risks are covered by commercial insurance coverage. All previous losses have not exceeded the insurance coverage.

(9) Evaluation of Subsequent Events

The District has evaluated subsequent events through May 6, 2016, the date on which the financial statements were available to be issued.

Schedule of Board Members' Per Diem

For the Year Ended December 31, 2015

John Burden	S	1,080
John Sandidge		300
Pete Lee		360
John Garner		540
Jay Kahn		120
James Kowaleski	*************	420
	s	2,820

Schedule of Compensation, Benefits, and Other Payments to Agency Head or Chief Executive Officer

For the Year Ended December 31, 2015

(See Independent Accountants' Review Report)

Agency Head Name: John Burden

Purpose	Amount
Salary	\$ •
Benefits - Insurance	201
Benefits - Retirement	~
Benefits - Other	223
Car Allowance	-
Vehicle Provided by Government	223
Per Diem	1,080
Reimbursements	200
Travel	~
Registration Fees	201
Conference Travel	-
Continuing Professional Education Fees	201
Housing	885
Unvouchered Expenses	
Special Meals	125

Schedule of Findings and Management's Corrective Action Plan

For the Year Ending December 31, 2015

Finding 2015-1:

Criteria:

Management is responsible for developing internal controls related to the preparation of financial statements as well as preparing financial statements in accordance with accounting principles generally accepted in the United States of America.

Condition & Cause:

As is common in small organizations, management has chosen to engage the auditor to propose certain year-end adjusting entries and to prepare the Company's annual financial statements. This condition is intentional by management based upon the cost effectiveness of acquiring the ability to prepare financial statements in accordance with generally accepted accounting principles. Consistent with this decision, internal controls over the preparation of year-end adjusting entries and annual financial statements, complete with notes, in accordance with generally accepted accounting principles, have not been established. Under generally accepted auditing standards, this condition represents a significant deficiency in internal controls. Recently issued Statement on Auditing Standards (SAS) 115 requires that we report the above condition as a control deficiency. The SAS does not provide exceptions to reporting deficiencies that are adequately mitigated with nonaudit services rendered by the auditor or deficiencies for which the remedy would be cost prohibitive or otherwise impractical.

Recommendation:

As mentioned above, whether or not it would be cost effective to cure a control deficiency is not a factor in applying SAS 115's reporting requirements. Because prudent management requires that the potential benefit from an internal control must exceed its cost, it may not be practical to correct all the deficiencies an auditor reports under SAS 115. In this case we do not believe that curing the significant deficiency described above would be cost effective or practical and accordingly do not believe any corrective action is necessary.

Management Corrective Action Plan:

In response to the finding, management feels that it is a prudent use of funds to engage the auditor to prepare the Company's annual financial reports. We therefore agree with the auditors' recommendation that no correction action is necessary.

Finding 2015-2:

Criteria:

Management is responsible for developing internal controls related to the preparation of financial statements as well as preparing financial statements in accordance with accounting principles generally accepted in the United States of America.

Condition & Cause:

During our review, we were required to record several adjusting journal entries to accurately reflect certain account balances at year end. These adjustments included the reclassification of capital items being expensed, to record depreciation expense, and to adjust the balance of accounts payable and revenues receivable.

Recommendation:

We recommend the District have their accountant review these areas at the end of each year and post adjustments as necessary.

Schedule of Findings and Management's Corrective Action Plan

For the Year Ending December 31, 2015

Management Corrective Action Plan:

The District will request that the accountant review all year end balance and post any adjustments deemed necessary to accurately reflect its financial position and results of operations.

Status of Prior Year Findings

For the Year Ending December 31, 2014

Finding 2014-1:

Criteria:

Management is responsible for developing internal controls related to the preparation of financial statements as well as preparing financial statements in accordance with accounting principles generally accepted in the United States of America.

Condition & Cause:

As is common in small organizations, management has chosen to engage the auditor to propose certain year-end adjusting entries and to prepare the Company's annual financial statements. This condition is intentional by management based upon the cost effectiveness of acquiring the ability to prepare financial statements in accordance with generally accepted accounting principles. Consistent with this decision, internal controls over the preparation of year-end adjusting entries and annual financial statements, complete with notes, in accordance with generally accepted adjusting standards, this condition represents a significant deficiency in internal controls. Recently issued Statement on Auditing Standards (SAS) 115 requires that we report the above condition as a control deficiency. The SAS does not provide exceptions to reporting deficiencies that are adequately mitigated with nonaudit services rendered by the auditor or deficiencies for which the remedy would be cost prohibitive or otherwise impractical.

Recommendation:

As mentioned above, whether or not it would be cost effective to cure a control deficiency is not a factor in applying SAS 115's reporting requirements. Because prudent management requires that the potential benefit from an internal control must exceed its cost, it may not be practical to correct all the deficiencies an auditor reports under SAS 115. In this case we do not believe that curing the significant deficiency described above would be cost effective or practical and accordingly do not believe any corrective action is necessary.

Management Corrective Action Plan:

In response to the finding, management feels that it is a prudent use of funds to engage the auditor to prepare the Company's annual financial reports. We therefore agree with the auditors' recommendation that no correction action is necessary.

Status:

There is no change in the status of this finding.

Finding 2015-2:

Criteria:

Management is responsible for developing internal controls related to the preparation of financial statements as well as preparing financial statements in accordance with accounting principles generally accepted in the United States of America.

Condition & Cause:

During our review, we were required to record several adjusting journal entries to accurately reflect certain account balances at year end. These adjustments included the reclassification of capital items being expensed, to record depreciation expense, and to adjust the balance of accounts payable and revenues receivable.

Status of Prior Year Findings

For the Year Ending December 31, 2014

Recommendation:

We recommend the District have their accountant review these areas at the end of each year and post adjustments as necessary.

Management Corrective Action Plan:

The District will request that the accountant review all year end balance and post any adjustments deemed necessary to accurately reflect its financial position and results of operations.

Status: Unresolved.

GRIFFIN & FURMAN, LLC CERTIFIED PUBLIC ACCOUNTANTS

Stephen M. Griffin, CPA Robert J. Furman, CPA

INDEPENDENT ACCOUNTANTS' REPORT ON APPLYING AGREED-UPON PROCEDURES

To the Board Members Sewerage District No. 1 of St. Tammany Parish, State of Louisiana Covington, Louisiana

We have performed the procedures included in the Louisiana Government Audit Guide and enumerated below, which were agreed to by the management of the Sewerage District No. 1 of St. Tammany Parish, State of Louisiana (the District) and the Legislative Auditor, State of Louisiana, solely to assist the users in evaluating management's assertions about the District's compliance with certain laws and regulations for the year ended December 31, 2015, included in the accompanying Louisiana Attestation Questionnaire. This agreed-upon procedures engagement was performed in accordance with standards established by the American Institute of Certified Public Accountants. The sufficiency of these procedures is solely the responsibility of the specified users of 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.

Public Bid Law

1. Select all expenditures made during the year for material and supplies exceeding \$20,000, or public works exceeding \$100,000, and determine whether such purchases were made in accordance with LSA-RS 38:2211-2251 (the public bid law).

The District did not have any disbursements for public works exceeding \$100,000 or materials and supplies exceeding \$20,000.

Code of Ethics for Public Officials and Public Employees

2. Obtain from management a list of the immediate family members of each Board Member as defined by LSA-RS 42:1101-1124 (the code of ethics), and a list of outside business interests of all Board Members and employees, as well as their immediate families.

Five Board members provided us with signed statements indicating neither they nor their immediate family members and/or their business interests had business relations of any kind with the District. One Board member moved out of state and did not provide a signed statement however Management has asserted that the District conducted no business with related parties of the former Board member.

3. Obtain from management a listing of all employees paid during the period under examination.

The District has no employees.

4. Determine whether any of those employees included in the listing obtained from management in agreed-upon procedure (3) were also included on the listing obtained from management in agreed-upon procedure (2) as immediate family members.

Not applicable.

<u>Budgeting</u>

5. Obtain a copy of the legally adopted budget and all amendments, if applicable.

Not applicable as the District does not maintain a general or special revenue fund.

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

Not applicable as the District does not maintain a general or special revenue fund.

7. Compare the revenues and expenditures of the final budget to actual revenues and expenditures to determine if actual revenues failed to meet budgeted revenues by 5% or more if actual expenditures exceeded budgeted amounts by 5% or more.

Not applicable as the District does not maintain a general or special revenue fund.

Accounting and Reporting

8. Randomly select six disbursements made during the period under examination and:

(a) Trace payments to supporting documentation as to proper amount and payee;

All payments were traced to supporting documentation without exception

(b) Determine if payments were properly coded to the correct fund and general ledger account;

All payments were properly coded to the correct fund and general ledger account without exception

(c) Determine whether payments received approval from proper authorities.

All payments were properly approved.

Meetings

9. Examine evidence indicating that agendas for meetings recorded in the minute book were posted or advertised as required by LSA-RS 42:1 through 42:12 (the open meetings law).

Management has asserted that such documents were properly posted on both the website and the door of the District's office and gymnasium.

<u>Debt</u>

10. Examine bank deposits for the period under examination and determine whether any such deposits appear to be proceeds of bank loans, bonds, or like indebtedness.

Bank deposits for the period under examination were reviewed noting no deposits that appear to be proceeds of bank loans, bonds, or like indebtedness.

Advances and Bonuses

11. Examine payroll records and minutes for the year to determine whether any payments have been made to employees which may constitute bonuses, advances, or gifts.

Not applicable. The District does not have any employees.

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

This report is intended solely for use of management of the Sewerage District No. 1 of the Parish of St. Tammany, State of Louisiana and the Legislative Auditor, State of Louisiana, and should not be used by those who have not agreed to the procedures and taken responsibility for the sufficiency of the procedures for their purposes. Under Louisiana Revised Statute 24:513, this report is distributed by the Legislative Auditor as a public document.

Griffin & Furman, LLC

May 6, 2016

LOUISIANA ATTESTATION QUESTIONNAIRE (For Attestation Engagements of Government)

May 6, 2016 (Date Transmitted)

Griffin & Furman, LLC		
P.O. Box 983		
Mandeville, Louisiana 70470	· · · · · · · · ·	
	· · · · · · · · · · · · · · · · · · ·	(Auditors)

In connection with your review of our financial statements as of December 31, 2015 and for the year then ended, and as required by Louisiana Revised Statute 24:513 and the *Louisiana Governmental Audit Guide*, we make the following representations to you. We accept full responsibility for our compliance with the following laws and regulations and the internal controls over compliance with such laws and regulations. We have evaluated our compliance with the following these representations.

These representations are based on the information available to us as of May 6, 2016.

Public Bid Law

It is true that we have complied with the public bid law, LSA-RS Title 38:2211-2296, and, where applicable, the regulations of the Division of Administration, State Purchasing Office...

Code of Ethics for Public Officials and Public Employees

It is true that no employees or officials have accepted anything of value, whether in the form of a service, loan, or promise, from anyone that would constitute a violation of LSA-RS 42:1101-1124. Yes [, $\frac{1}{2}$ No []

It is true that no member of the immediate family of any member of the governing authority, or the chief executive of the governmental entity, has been employed by the governmental entity after April 1, 1980, under circumstances that would constitute a violation of LSA-RS 42:1119. Yes [i] No []

Budgeting

We have complied with the state budgeting requirements of the Local Government Budget Act (LSA-RS 39:1301-15), R.S. 39:33, or the budget requirements of LSA-RS 39:1331-1342, as applicable.

Yes [i/] No []

Accounting and Reporting

All non-exempt governmental records are available as a public record and have been retained for at least three years, as required by LSA-RS 44:1, 44:7, 44:31, and 44:36.

Yes [/] No []

We have filed our annual financial statements in accordance with LSA-RS 24:514, and 33:463 where applicable.

Yes [[/] No []

We have had our financial statements audited or compiled in accordance with LSA-RS 24:513. Yes [1/] No [1]

We have complied with R.S. 24:513A.(3) regarding disclosure of compensation, reimbursements, benefits, and other payments to the agency head, political subdivision head, or chief executive officer

Yes [1/] No []

Meetings

We have complied with the provisions of the Open Meetings Law, provided in RS 42:1 through 42:28.

Yes [t/] No []

Debt

It is true we have not incurred any indebtedness, other than credit for 90 days or less to make purchases in the ordinary course of administration, nor have we entered into any lease-purchase agreements, without the approval of the State Bond Commission, as provided by Article VII, Section 8 of the 1974 Louisiana Constitution, Article VI, Section 33 of the 1974 Louisiana Constitution, and LSA-RS 39:1410.60-1410.65.

Yes [/] No []

Advances and Bonuses

It is true we have not advanced wages or salaries to employees or paid bonuses in violation of Article VII, Section 14 of the 1974 Louisiana Constitution, LSA-RS 14:138, and AG opinion 79-729.

Yes [] No []

We have disclosed to you all known noncompliance of the foregoing laws and regulations, as well as any contradictions to the foregoing representations. We have made available to you documentation relating to the foregoing laws and regulations.

We have provided you with any communications from regulatory agencies or other sources concerning any possible noncompliance with the foregoing laws and regulations, including any communications received between the end of the period under examination and the issuance of this report. We acknowledge our responsibility to disclose to you any known noncompliance which may occur subsequent to the issuance of your report.

	Secretary	Date
Mary her Me	Treasurer5/5/	16Date
John A. Bullen	President_05 May	2014 Date
0		