CITY OF NAPA
MEMORANDUM ON INTERNAL CONTROL
AND
REQUIRED COMMUNICATIONS

FOR THE YEAR ENDED JUNE 30, 2013

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CITY OF NAPA
MEMORANDUM ON INTERNAL CONTROL
AND
REQUIRED COMMUNICATIONS

For The Year Ended June 30, 2013

Table of Contents

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MEMORANDUM ON INTERNAL CONTROL

To the City Council of
the City of Napa, California

We have audited the basic financial statements of the City of Napa as of and for the year ended June 30, 2013, and have issued our report thereon dated February 10, 2014. In planning and performing our audit of the basic financial statements of the City of Napa, in accordance with auditing standards generally accepted in the United States of America, we considered the City's internal control over financial reporting (internal control) as a basis for designing our auditing procedures for the purpose of expressing our opinions on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of the City's internal control. Accordingly, we do not express an opinion on the effectiveness of the City's internal control.

Our consideration of internal control was for the limited purpose described in the preceding paragraph and was not designed to identify all deficiencies in internal control that might be material weaknesses or significant deficiencies and, therefore, material weaknesses or significant deficiencies may exist and that were not identified. In addition, because of inherent limitations in internal control, including the possibility of management override of controls, misstatements due to error or fraud may occur and not be detected by such controls.

A deficiency in internal control exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct misstatements on a timely basis. A material weakness is a deficiency, or a combination of deficiencies, in internal control, such that there is a reasonable possibility that a material misstatement of the City's financial statements will not be prevented, or detected and corrected on a timely basis. We did not identify any deficiencies in internal control that we consider to be material weaknesses.

A significant deficiency is a deficiency, or a combination of deficiencies, in internal control that is less severe than a material weakness, yet important enough to merit attention by those charged with governance. We identified certain deficiencies in internal control that we consider to be significant deficiencies that are included on the Schedule of Significant Deficiencies.

Included in the Schedule of Other Matters are recommendations not meeting the above definitions that we believe to be of potential benefit to the City.

Management responses included in this report have not been subjected to the audit procedures applied in the audit of the financial statements and, accordingly, we express no opinion on them.

Accountancy Corporation
3478 Buskirk Avenue, Suite 215
Pleasant Hill, CA 94523

T 925.930.0902
F 925.930.0135
E maze@mazeassociates.com
W **mazeassociates.com**

This communication is intended solely for the information and use of management, City Council, others within the organization, and agencies and pass-through entities requiring compliance with generally accepted government auditing standards, and is not intended to be and should not be used by anyone other than these specified parties.

Maze & Associates

Pleasant Hill, California
February 10, 2014

CITY OF NAPA

MEMORANDUM ON INTERNAL CONTROL

SCHEDULE OF SIGNIFICANT DEFICIENCIES

2013 - 1: Segregation of Duties for Journal Entry Process

***Criteria*:** An employee should not be able to prepare and approve the same journal entry.

***Condition*:** During our interim testing it was noted that a journal entry was prepared, approved and posted to the general ledger by the Interim Finance Manager.

***Effect*:** Allowing the preparer of a journal entry to approve the entry defeats the purpose of a review.

***Cause*:** There was a significant backlog of journal entries that needed to be created, reviewed and approved resulting from the concurrent vacancies of the Finance Director and Finance Manager in early 2013. The Finance Analyst was responsible for creating a number of journal entries, and that responsibility had not yet been delegated at the time she needed to also provide the review responsibility while acting as Interim Finance Manager.

***Recommendation*:** Journal entries should always be reviewed by a second employee before posting to the system. For emergency situations when this is not feasible, a review should be done subsequent to the posting.

***Management Response*:** The City agrees with the auditor's conclusion and has a workflow model which requires journal entries to be approved by a second authorized reviewer through the electronic workflow system before they are posted. This was a one-time unique situation that will not occur again.

The Finance Manager generates only a few year-end journal entries (roll-forward of existing balances to the new fiscal year in both the GL and JL) through the Recurring Calculation function which are not submitted through the work flow model. Staff will ensure a second reviewer approves the entry either prior to posting, or in the case of a time sensitive entry, as soon as immediately feasible following the posting of the Balance Forward JE.

Finally, staff will review the report of journal entries posted as part of the monthly close process to ensure all transactions posted to the General Ledger have been reviewed and received proper approval.

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CITY OF NAPA

MEMORANDUM ON INTERNAL CONTROL

SCHEDULE OF OTHER MATTERS

2013 - 2: Update of Signature Cards

Criteria**:** Signature cards of the City's bank and investment accounts should be updated whenever there are changes to the authorized signers.

Condition**:** Our audit process found that the City's bank accounts were not updated in a timely manner to reflect changes in authorized signers. As of May 8, 2013, all of the City's accounts had former employees listed as authorized signers.

Effect**:** Having former employees on the bank and investment accounts may lead to unauthorized transactions.

Cause**:** Due to the rapid turnover in staff, signature cards were updated four times between July 2012 and April 2013. The fifth update, (which should have occurred in April 2013) did not occur until May, 2013.

Recommendation**:** It is during the time of staff shortage and rapid staff turnover that internal controls should be tightened. We recommend that the City update the signatures cards as soon as there is a change of staff, even if that means sending the banks monthly or weekly updates.

Management Response**:** The delay in updating the signature cards was a one-time occurrence. We understand and respect the need to update the cards whenever there is a staffing change, evidenced by the four updates which occurred between July 2012 and April 2013. In the future, we will ensure to begin the signature card update process as soon as it is known an employee will be separating to ensure access is removed on the employee's final day.

NEW GASB PRONOUNCEMENTS OR PRONOUNCEMENTS NOT YET EFFECTIVE

The following comment represents new pronouncements taking affect in the next few years. We have cited them here to keep you abreast of developments:

EFFECTIVE FISCAL 2014:

GASB Statement 66 – Technical Corrections—2012—an amendment of GASB Statements No. 10 and No. 62

The objective of this Statement is to improve accounting and financial reporting for a governmental financial reporting entity by resolving conflicting guidance that resulted from the issuance of two pronouncements, Statements No. 54, *Fund Balance Reporting and Governmental Fund Type Definitions,* and No. 62, *Codification of Accounting and Financial Reporting Guidance Contained in Pre-November 30, 1989 FASB and AICPA Pronouncements.*

This Statement removes the GASB Statement No. 10 provision that limits fund-based reporting of an entity's risk financing activities to the general fund and the internal service fund type.

This Statement also amends Statement 62 by modifying the specific guidance on accounting for (1) operating lease payments that vary from a straight-line basis, (2) the difference between the initial investment (purchase price) and the principal amount of a purchased loan or group of loans, and (3) servicing fees related to mortgage loans that are sold when the stated service fee rate differs significantly from a current (normal) servicing fee rate. These changes clarify how to apply Statement No. 13, *Accounting for Operating Leases with Scheduled Rent Increases,* and result in guidance that is consistent with the requirements in Statement No. 48, *Sales and Pledges of Receivables and Future Revenues and Intra-Entity Transfers of Assets and Future Revenues,* respectively.

GASB 67 – ***Financial Reporting for Pension Plans—an amendment of GASB Statement No. 25***

This statement is applicable when a Trust arrangement is established to hold the employer contributions prior to payment to the retirees (i.e. funding changes to prefunding rather than the current pay-as-you-go funding).

This Statement replaces the requirements of Statements No. 25, *Financial Reporting for Defined Benefit Pension Plans and Note Disclosures for Defined Contribution Plans*, and No. 50, *Pension Disclosures,* as they relate to pension plans that are administered through trusts or equivalent arrangements (hereafter jointly referred to as trusts) that meet certain criteria. The requirements of Statements 25 and 50 remain applicable to pension plans that are not administered through trusts covered by the scope of this Statement and to defined contribution plans that provide postemployment benefits other than pensions.

GASB 70 - ***Accounting and Financial Reporting for Nonexchange Financial Guarantees***

Some governments extend financial guarantees for the obligations of another government, a not-for-profit entity, or a private entity without directly receiving equal or approximately equal value in exchange (a nonexchange transaction). As a part of this nonexchange financial guarantee, a government commits to indemnify the holder of the obligation if the entity that issued the obligation does not fulfill its payment requirements. Also, some governments issue obligations that are guaranteed by other entities in a nonexchange transaction. The objective of this Statement is to improve accounting and financial reporting by state and local governments that extend and receive nonexchange financial guarantees.

This Statement requires a government that extends a nonexchange financial guarantee to recognize a liability when qualitative factors and historical data, if any, indicate that it is more likely than not that the government will be required to make a payment on the guarantee. The amount of the liability to be recognized should be the discounted present value of the best estimate of the future outflows related to the guarantee expected to be incurred. When there is no best estimate but a range of the estimated future outflows can be established, the amount of the liability to be recognized should be the discounted present value of the minimum amount within the range.

This Statement requires a government that has issued an obligation guaranteed in a nonexchange transaction to recognize revenue to the extent of the reduction in its guaranteed liabilities. This Statement also requires a government that is required to repay a guarantor for making a payment on a guaranteed obligation or legally assuming the guaranteed obligation to continue to recognize a liability until legally released as an obligor. When a government is released as an obligor, the government should recognize revenue as a result of being relieved of the obligation. This Statement also provides additional guidance for intra-entity nonexchange financial guarantees involving blended component units.

This Statement specifies the information required to be disclosed by governments that extend nonexchange financial guarantees. In addition, this Statement requires new information to be disclosed by governments that receive nonexchange financial guarantees.

The provisions of this Statement are effective for reporting periods **beginning after June 15, 2013**. Except for disclosures related to cumulative amounts paid or received in relation to a financial guarantee, the provisions of this Statement are required to be applied retroactively. Disclosures related to cumulative amounts paid or received in relation to a financial guarantee may be applied prospectively.

EFFECTIVE FISCAL 2015:

GASB 68 - <u>Accounting and Financial Reporting for Pensions (an amendment of GASB 27)</u>

This Statement will have material impact on the City's financial statements. The primary objective of this Statement is to improve accounting and financial reporting by state and local governments for pensions.

This Statement establishes standards for measuring and recognizing liabilities, deferred outflows of resources, and deferred inflows of resources, and expense/expenditures. For defined benefit pensions, this Statement identifies the methods and assumptions that should be used to project benefit payments, discount projected benefit payments to their actuarial present value, and attribute that present value to periods of employee service.

In financial statements prepared using the economic resources measurement focus and accrual basis of accounting, a single or agent employer that does not have a special funding situation is required to recognize a liability equal to the net pension liability. The net pension liability is required to be measured as of a date no earlier than the end of the employer's prior fiscal year (the measurement date), consistently applied from period to period.

Note disclosure and required supplementary information requirements about pensions also are addressed. Distinctions are made regarding the particular requirements for employers based on the number of employers whose employees are provided with pensions through the pension plan and whether pension obligations and pension plan assets are shared.

The following are the major impacts:

- This Statement requires the liability of employers and nonemployer contributing entities to employees for defined benefit pensions (**<u>net pension liability</u>**) to be measured as the portion of the present value of projected benefit payments to be provided through the pension plan to current active and inactive employees that is attributed to those employees' past periods of service (**<u>total pension liability</u>**), **less** the amount of the pension plan's **<u>fiduciary net position</u>**.

- Actuarial valuations of the total pension liability are required to be performed at least every two years, with more frequent valuations encouraged. If a valuation is not performed as of the measurement date, the total pension liability is required to be based on update procedures to roll forward amounts from an earlier actuarial valuation (performed as of a date no more than 30 months and 1 day prior to the employer's most recent year-end).

- The actuarial present value of projected benefit payments is required to be attributed to periods of employee service using the entry age actuarial cost method with each period's service cost determined as a level percentage of pay. The actuarial present value is required to be attributed for each employee individually, from the period when the employee first accrues pensions through the period when the employee retires.

GASB 69 – *Government Combinations and Disposals of Government Operations*

This Statement establishes accounting and financial reporting standards related to government combinations and disposals of government operations. As used in this Statement, the term *government combinations* includes a variety of transactions referred to as mergers, acquisitions, and transfers of operations.

CITY OF NAPA

MEMORANDUM ON INTERNAL CONTROL

SCHEDULE OF PRIOR YEAR MATERIAL WEAKNESSES

2012-01 – Preparation of Financial Statements

Criteria: The City's financial statements must be complete and accurate prior to the start of the final phase of the audit in order for the audit to be completed on a timely basis.

Condition: The City's financial statements provided for our audit in October 2012 were not completed. Subsequently, the financial statements were revised several times between October 2012 and March 2013.

Effect: Substantial time is required in order to get the City's financial statements to its final version. As a result, we were not able to issue our audit opinion until April 2013.

Cause: The combination of the City's goal to provide roll-ups to the auditors (for the first time), along with the separation of the Finance Manager in March 2012, and the additional work resulting from the dissolution of the Redevelopment Agency impacted the City's ability to meet the October deadline for preparation of the preliminary financial statements.

Recommendation: In order to ensure that the financial statements are readily available for the audit on a timely basis, adequate staff resources need to be allocated for the financial statement preparation. A detailed time schedule should be mapped out for the process. Also, proper support should be provided to staff that prepares the financial statements in the form of education and training throughout the year.

Current Status: City staff prepared the roll-ups, basic financial statements, statistical section and CAFR draft this year in addition to the lead schedules and footnotes. The City was slightly behind schedule at times, due to the steep learning curve, however was still able to complete the CAFR in February. Based on known IFAS report improvements, the City anticipates no issues with meeting a December deadline for the CAFR in the future.

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CITY OF NAPA

MEMORANDUM ON INTERNAL CONTROL

SCHEDULE OF PRIOR YEAR SIGNIFICANT DEFICIENCIES

2012-02 – Timely Preparation of Bank Reconciliations

Criteria: Cash and investments are the asset at greatest risk of misappropriation. Reconciliations of these items play an important role in the effectiveness of an entity's internal control structure. Reconciliations should be prepared on a timely basis, generally within 30 day of receiving the statements from the financial institutions, and reviewed by an employee other than the preparer.

Condition: During our interim and final phase of the audit, we tested the City's bank and investment reconciliations and noted the following:

> Investment accounts: We reviewed the State of California Local Agency Investment Fund (LAIF) reconciliations for Napa Community Redevelopment Agency (NCRA), The City of Napa Public Facilities Financing Authority (NPFFA), The Housing Authority of the City of Napa, and the City for the month of January 2012 and noted that a City accountant prepared the reconciliations. However, there was no evidence of a review.
>
> Checking accounts: We reviewed bank reconciliations for the City's general checking account, MDF collections, and MDF refunds for the months of August 2011 and January 2012 and noted that a City accountant prepared the reconciliations. However, there was no evidence of a review. In addition, we also reviewed reconciliations for the credit card, liability insurance, CRD recware, and the Housing Authority of the City of Napa account for the month of August 2011. We noted a City accountant prepared the reconciliations but the reconciliations were not reviewed until February 2012. We also noted the June 30th bank reconciliations were not prepared and/ or reviewed in timely fashion for the following bank accounts: primary checking account, credit card, CDR recware, the Housing Authority of the City of Napa, Laurel Manner, MDF collection, Rapid Pay, RSSS escrow account, and the Successor Agency to the Napa Community Redevelopment Agency.

Effect: Any errors and/or check fraud may not be detected in a timely manner. The Uniform Commercial Codes provides that under certain conditions, the most important being timely bank reconciliation, depositors who detect fraudulent transactions and inform their banks in a timely manner may not be responsible for the fraud loss. Banks may pay for any potential loss if reported timely.

Cause: Although the preparation and review of bank reconciliations is a high priority of the Finance Department (both the Accountants, the Audit & Accounting Supervisor, and the Finance Manager), the impact of the Finance Manager's departure resulted in a number of items falling off-schedule.

Recommendation: The City should consider reconciliation bank accounts as a high priority and review all bank reconciliations in a timely matter.

Current Status: City staff has made reconciliation and review of bank statements a high priority. All bank statements are fully reconciled, reviewed, and any resulting Journal Entries posted before the 15th of the month (prior to the close).

CITY OF NAPA

MEMORANDUM ON INTERNAL CONTROL

SCHEDULE OF PRIOR YEAR SIGNIFICANT DEFICIENCIES

2012-03 – Internal Controls over Wire Transfers

Criteria: Wire transfers should be initiated by one employee and authorized by another.

Condition: During our testing of wire transfers, we noted a wire transfer from the City's liability insurance account to the City's operating checking account, initiated on January 31, 2012, was prepared and called it in by the same employee.

Effect: The lack of an approval procedure in wire transfers creates an opportunity for undetected fraud and error.

Cause: The City has set up an online banking system that does not allow the same person to prepare and authorize the same wire transaction. However, we were told by City staff that the City was having technical issues with using the software. Therefore, the phone-in system was used instead.

Recommendation: We recommend the City work with the bank to resolve issues of the online banking in order to utilize the online wire transfer feature in the system.

Current Status: Completed in July 2013. On-line banking has resolved this issue. Entry of the wire transfer is limited by access to the Accountants, and approval (release) of the wire transfer is limited to the Accounting and Audit Supervisor, the Finance Manager, or the Finance Director.

CITY OF NAPA

MEMORANDUM ON INTERNAL CONTROL

SCHEDULE OF PRIOR YEAR OTHER MATTERS

2012-04 - Outstanding Checks

Criteria: The City should have a policy to follow up on checks that have been outstanding for a period of time.

Condition: Per review of the outstanding checklists accompanying the January 2012 bank reconciliation, we noted the following:
General checking: There were 96 checks that totaled to $19,250 in the City's checking bank account that had been outstanding for more than 6 months. These checks are dated as far back as 7/16/09.

MDF refunds: There were 30 checks that totaled to $19,751 in the MDF refunds bank account that had been outstanding for more than 6 months. These checks are dated as far back as 12/10/07.

The Housing Authority of the City of Napa: There were 130 checks that totaled to $8,825 in the Housing Authority checking account that had been outstanding since 5/1/07.

Per review of the outstanding checklists accompanying the June 2012 bank reconciliation, we noted the following:

There were 267 accounts payable checks that totaled $43,339. These checks are dated as far back as 6/3/2005. There were 29 Payroll Checks that totaled $2,577. These checks are dated as far back as 4/15/2005.

Effect: The City's cash balance could have been misstated due to the stale dated checks.

Cause: The City does not have an established procedure in handling for outstanding checks.

Recommendation: The City should implement a policy to follow up, every six months, on checks that have been outstanding for a period of time.

Current Status: Completed in July 2013. The City is now in process of the annual "escheatment" consistent with the approved policy.

2012-05 - The Accounting and Audit Supervisor's Access over Disbursements and Payroll Modules

Criteria: Employees who have access to the electronic signatures and blank check stock should not also have access to the general ledger, payroll module or the accounts payable module. In addition, payroll and accounts payable processing should be segregated from the function of check register review and bank reconciliations.

Condition: During our internal control testing, we noted that the Accounting and Audit Supervisor who has full-access to the general ledger, payroll module and the accounts payable module is also responsible for reviewing the check registers and has access to the electronic signatures and blank check stock.

Effect: An employee who has access to various functions, as mentioned above, could potentially run their own registers and payments without anyone knowing.

Cause: The City feels that the Accounting and Audit Supervisor needs full access to the accounts payable and payroll module because she is the back-up person for the payroll and accounts payable functions.

Recommendation: The City should review the various duties assigned to the Accounting and Audit Supervisor. Her access to the module should be limited to inquiry only. If she needs full access to the payroll module, the function of payroll review should be performed by another employee who cannot run payroll run, and do not have access to blank check stock or electronic signatures.

Current Status: The electronic signature access has been removed from the Accounting and Audit Supervisor.

MAZE & ASSOCIATES

REQUIRED COMMUNICATIONS

February 10, 2014

To the City Council of
the City of Napa, California

We have audited the basic financial statements of the City of Napa for the year ended June 30, 2013. Professional standards require that we communicate to you the following information related to our audit under generally accepted auditing standards and, *Government Auditing Standards* and OMB Circular A-133.

Significant Audit Findings

Accounting Policies

Management is responsible for the selection and use of appropriate accounting policies. The significant accounting policies used by City of Napa are described in Note 1 to the financial statements.

The following pronouncements became effective, but did not have a material effect on the financial statements:

GASB 60 - *Accounting and Financial Reporting for Service Concession Arrangements*

GASB 61 - The Financial Reporting Entity: Omnibus, an amendment of GASB Statements No. 14 and No. 34

GASB 62 - *Codification of Accounting and Financial Reporting Guidance Contained in Pre-November 30, 1989 FASB and AICPA Pronouncements*

The following pronouncement became effective, and required a format change in the Statements of Net Assets and certain nomenclature revisions in the footnotes accompanying the financial statements

GASB 63 - *Financial Reporting of Deferred Outflows of Resources, Deferred Inflows of Resources, and Net Position.* See Note 1 to the financial statements for relevant disclosures.

Management early-implemented the provision of the following Governmental Accounting Standards Board Statement during the year ended June 30, 2013. This provision required certain nomenclature revisions in the financial statements

Statement 65 – *Items Previously Report as Assets and Liabilities*. See Note 1 to the financial statements for relevant disclosures.

Unusual Transactions, Controversial or Emerging Areas

We noted no transactions entered into by the City during the year for which there is a lack of authoritative guidance or consensus. All significant transactions have been recognized in the financial statements in the proper period.

Estimates

Accounting estimates are an integral part of the financial statements prepared by management and are based on management's knowledge and experience about past and current events and assumptions about future events. Certain accounting estimates are particularly sensitive because of their significance to the financial statements and because of the possibility that future events affecting them may differ significantly from those expected. The most sensitive estimate(s) affecting the City's financial statements were:

The City's cash and investments are measured by fair value. Fair value is essentially market pricing in effect as of June 30, 2013. These fair values are not required to be adjusted for changes in general market conditions occurring subsequent to June 30, 2013.

The City's capital contributions and outstanding liability related to its contract with the Napa County Flood Control and Water Conservation District (NCFCWD) are determined by management based on the most available information provided by NCFCWD as disclosed in Note 9 to the financial statements. We evaluated the factors and assumptions used to develop the estimates and determined that they are reasonable in relation to the basic financial statements taken as a whole.

Management's estimate of depreciation is based on useful lives determined by management. These lives have been determined by management based on the expected useful life of assets as disclosed in Note 1H to the financial statements. We evaluated the key factors and assumptions used to develop the depreciation estimate and determined that it is reasonable in relation to the basic financial statements taken as a whole.

Difficulties Encountered in Performing the Audit

We encountered no significant difficulties in dealing with management in performing and completing our audit.

Corrected and Uncorrected Misstatements

Professional standards require us to accumulate all known and likely misstatements identified during the audit, other than those that are clearly trivial, and communicate them to the appropriate level of management. Management has corrected all/certain such misstatements. In addition, none of the misstatements detected as a result of audit procedures and corrected by management were material, either individually or in the aggregate, to each opinion unit's financial statements taken as a whole.

Disagreements with Management

For purposes of this letter, a disagreement with management is a financial accounting, reporting, or auditing matter, whether or not resolved to our satisfaction, that could be significant to the financial statements or the auditor's report. We are pleased to report that no such disagreements arose during the course of our audit.

Management Representations

We have requested certain representations from management that are included in a management representation letter dated February 10, 2014.

Management Consultations with Other Independent Accountants

In some cases, management may decide to consult with other accountants about auditing and accounting matters, similar to obtaining a "second opinion" on certain situations. If a consultation involves application of an accounting principle to the City's financial statements or a determination of the type of auditor's opinion that may be expressed on those statements, our professional standards require the consulting accountant to check with us to determine that the consultant has all the relevant facts. To our knowledge, there were no such consultations with other accountants.

Other Audit Findings or Issues

We generally discuss a variety of matters, including the application of accounting principles and auditing standards, with management each year prior to retention as the governmental unit's auditors. However, these discussions occurred in the normal course of our professional relationship and our responses were not a condition to our retention.

Other Information Accompanying the Financial Statements

With respect to the supplementary information accompanying the financial statements, we made certain inquiries of management and evaluated the form, content, and methods of preparing the information to determine that the information complies with accounting principles generally accepted in the United States of America, the method of preparing it has not changed from the prior period, and the information is appropriate and complete in relation to our audit of the financial statements. We compared and reconciled the supplementary information to the underlying accounting records used to prepare the financial statements or to the financial statements themselves.

With respect to the required supplementary information accompanying the financial statements, we applied certain limited procedures to the required supplementary information in accordance with auditing standards generally accepted in the United States of America, which consisted of inquiries of management about the methods of preparing the information and comparing the information for consistency with management's responses to our inquiries, the basic financial statements, and other knowledge we obtained during our audit of the basic financial statements. We did not express an opinion nor provide any assurance on the information because the limited procedures do not provide us with sufficient evidence to express an opinion or provide any assurance.

The Introductory and Statistical Sections included as part of the Comprehensive Annual Financial Report have not been subjected to the auditing procedures applied in the audit of the basic financial statements and, accordingly, we did not express an opinion nor provide any assurance on them.

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This information is intended solely for the use of City Council and management and is not intended to be, and should not be, used by anyone other than these specified parties.

Very truly yours,

Maze & Associates

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