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August 7, 2014

Board of Commissioners Chamorro Land Trust Commission

Dear Board of Commissioners:

We have performed an audit of the financial statements of the Chamorro Land Trust Commission (the "Commission") as of and for the years ended September 30, 2012 and 2011, in accordance with auditing standards generally accepted in the United States of America ("generally accepted auditing standards") and have issued our report thereon dated August 7, 2014.

We have prepared the following comments to assist you in fulfilling your obligation to oversee the financial reporting and disclosure process for which management of the Commission is responsible.

OUR RESPONSIBILITY UNDER GENERALLY ACCEPTED AUDITING STANDARDS AND GENERALLY ACCEPTED GOVERNMENT AUDITING STANDARDS

Our responsibility under generally accepted auditing standards and standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States, have been described in our engagement letter dated January 21, 2014. As described in that letter, the objective of a financial statement audit conducted in accordance with the aforementioned standards is:

- To express an opinion on the fairness of the Commission's basic financial statements and the accompanying supplementary information, and to disclaim an opinion on the required supplementary information for the years ended September 30, 2012 and 2011 in conformity with accounting principles generally accepted in the United States of America ("generally accepted accounting principles"), in all material respects;
- To express an opinion on whether the supplementary information that accompanies the basic financial statements is presented fairly, in all material respects, in relation to the basic financial statements taken as a whole; and
- To report on the Commission's internal control over financial reporting and on its compliance with certain provisions of laws, regulations, contracts, and grant agreements and other matters for the years ended September 30, 2012 and 2011 based on an audit of financial statements performed in accordance with the standards applicable to financial audits contained in *Government Auditing Standards*.

Our responsibilities under generally accepted auditing standards include forming and expressing an opinion about whether the financial statements that have been prepared with the oversight of management and the Department of Land Management's Office of the Director are presented fairly, in all material respects, in conformity with generally accepted accounting principles. The audit of the financial statements does not relieve management or the Department of Land Management's Office of the Director of their responsibilities.

We considered the Commission's internal control over financial reporting as a basis for designing audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Commission's internal control over financial reporting. Accordingly, we do not express an opinion on the effectiveness of the Commission's internal control over financial reporting. Our consideration of internal control over financial reporting would not necessarily identify all deficiencies in internal control over financial reporting that might be significant deficiencies or material weaknesses.

ACCOUNTING ESTIMATES

Accounting estimates are an integral part of the financial statements prepared by management and are based on management's current judgments. Those judgments are normally based on knowledge and experience about past and current events and on assumptions about future events. No significant accounting estimates are reflected in the Commission's 2012 and 2011 financial statements.

UNCORRECTED MISSTATEMENTS

Our audit of the financial statements was designed to obtain reasonable, rather than absolute, assurance about whether the financial statements are free of material misstatement, whether caused by error or fraud. We have attached to this letter, as Appendices A and B to Attachment I, a summary of uncorrected misstatements aggregated by us during the current engagement and pertaining to the latest period presented that were determined by management to be immaterial, both individually and in the aggregate, to the financial statements taken as a whole.

MATERIAL CORRECTED MISSTATEMENTS

Material misstatements were brought to the attention of management as a result of our audit procedures and were corrected by management during the current period. These corrected misstatements are listed in Attachment II and are reflected in the Commission's 2012 and 2011 financial statements.

SIGNIFICANT ACCOUNTING POLICIES

The Commission's significant accounting policies are set forth in Note 2 to the Commission's 2012 and 2011 financial statements. During the years ended September 30, 2012 and 2011, there were no significant changes in previously adopted accounting policies or their application.

DISAGREEMENTS WITH MANAGEMENT

We have not had any disagreements with management related to matters that are material to the Commission's 2012 and 2011 financial statements.

OUR VIEWS ABOUT SIGNIFICANT MATTERS THAT WERE THE SUBJECT OF CONSULTATION WITH OTHER ACCOUNTANTS

We are not aware of any consultations that management may have had with other accountants about auditing and accounting matters during 2012 and 2011.

SIGNIFICANT ISSUES DISCUSSED, OR SUBJECT OF CORRESPONDENCE, WITH MANAGEMENT PRIOR TO OUR RETENTION

Throughout the year, routine discussions regarding the application of accounting principles or auditing standards were held with management in connection with transactions that have occurred, transactions that are contemplated, or reassessment of current circumstances. In our judgment, such discussions were not held in connection with our retention as auditors.

SIGNIFICANT DIFFICULTIES ENCOUNTERED IN PERFORMING THE AUDIT

In our judgment, we received the full cooperation of the Commission's management and staff and had unrestricted access to the Commission's senior management in the performance of our audit.

MANAGEMENT'S REPRESENTATIONS

We have made specific inquiries of the Commission's management about the representations embodied in the financial statements. Additionally, we have requested that management provide to us the written representations the Funds are required to provide to its independent auditors under generally accepted auditing standards. We have attached to this letter, as Attachment I, a copy of the representation letter we obtained from management.

CONTROL-RELATED MATTERS

Delotte HawlellP

We have issued a separate report to you, also dated August 7, 2014, containing information regarding our consideration of the Commission's internal control over financial reporting and our tests of its compliance with certain provisions of laws, regulations, contracts and grant agreements.

This report is intended solely for the information and use of management, the Department of Land Management and the Office of Public Accountability of Guam and is not intended to be and should not be used by anyone other than these specified parties.

Very truly yours,

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ATTACHMENT I

DIPÅTTAMENTON MINANEHAN TÅNO' (Department of Land Management) GUBETNAMENTON GUÅHAN (Government of Guam)



MICHAEL J.B. BORJA Director

DAVID V. CAMACHO Deputy Director

EDDIE BAZA CALVO

RAY TENORIO Lieutenant Governor

August 7, 2014

Deloitte & Touche LLP Certified Public Accountants 361 South Marine Corps Drive Guam GU 96913

Gentlemen:

We are providing this letter in connection with your audits of the balance sheets of the Chamorro Land Trust Commission (CLTC), a governmental fund of the Government of Guam, as of September 30, 2012 and 2011, and the related statements of revenues, expenditures, and changes in fund balances for the years then ended, which collectively comprise the CLTC's basic financial statements for the purpose of expressing an opinion as to whether the basic financial statements present fairly, in all material respects, the financial position, results of operations or changes in fund balances of the CLTC in conformity with generally accepted accounting principles (GAAP) in the United States of America.

We confirm that we are responsible for the following:

- a. The fair presentation in the basic financial statements of financial position and results of operations in conformity with GAAP.
- b. The design, implementation, and maintenance of programs and controls to prevent and detect fraud, including fraud related to federal awards.
- c. Establishing and maintaining effective internal control over financial reporting.
- d. The review and approval of the financial statements and related notes and acknowledge your role in the preparation of this information. Specifically, we acknowledge that your role in the preparation of the financial statements was a matter of convenience rather than one of necessity. We have reviewed the financial statement preparation assistance provided by you and acknowledge that the financial statements are prepared in accordance with GAAP. Our review was based on the use of the financial statement disclosure checklist for a general-purpose government obtained from the Government Finance Officers Association.

Certain representations in this letter are described as being limited to matters that are material. Items are considered material, regardless of size, if they involve an omission or misstatement of accounting information that, in light of surrounding circumstances, makes it probable that the judgment of a reasonable person relying on the information would be changed or influenced by the omission or misstatement.

We confirm, to the best of our knowledge and belief, the following representations made to

you during your audits.

- 1. The basic financial statements referred to above are fairly presented in conformity with GAAP. In addition:
 - a. Deposits are properly classified in the category of custodial credit risk.
 - b. Required supplementary information is measured and presented within prescribed guidelines.
 - c. Applicable laws and regulations are followed in adopting, approving, and amending budgets.
 - d. Fund balance restrictions, commitments, and assignments are properly classified and, if applicable, approved.
- 2. The CLTC has provided to you all relevant information and access as agreed in the terms of the audit engagement letter.
- 3. The CLTC has provided you:
 - a. Minutes of the meetings of the Board of Commissioners or summaries of actions of recent meetings for which minutes have not yet been prepared.
 - b. Summaries of actions of legislation passed by the Government of Guam's legislative body as pertaining to the CLTC.
 - c. Financial records and related data for all financial transactions of the CLTC and for all funds administered by the CLTC. The records, books, and accounts, as provided to you, record the financial and fiscal operations of all funds administered by the CLTC and provide the audit trail to be used in a review of accountability. Information presented in financial reports is supported by the books and records from which the financial statements have been prepared.
 - d. Contracts and grant agreements (including amendments, if any) and any other correspondence that has taken place with federal agencies.

4. There has been no:

- a. Action taken by CLTC management that contravenes the provisions of federal laws and local laws and regulations, or of contracts and grants applicable to the CLTC.
- b. Communication from other regulatory agencies concerning noncompliance with or deficiencies in financial reporting practices or other matters that could have a material effect on the financial statements.
- 5. We believe the effects of any uncorrected financial statement misstatements aggregated by you during the current audit engagement and pertaining to the latest period presented are immaterial, both individually and in the aggregate, to the financial statements taken as a whole. A summary of such uncorrected misstatements has been attached as Appendix A.
- 6. We believe the effects of the uncorrected financial statement misstatements detected in the current year that relate to the prior year presented, when combined with those misstatements aggregated by you during the prior-year audit engagement and pertaining to the prior year presented, are immaterial, both individually and in the aggregate, to the financial statements for the year ended September 30, 2011 taken as a

whole. A summary of such uncorrected misstatements has been attached as Appendix B.

- 7. The CLTC has not performed a risk assessment, including the assessment of the risk that the financial statements may be materially misstated as a result of fraud. However, management has made available to you their understanding about the risks of fraud in the CLTC and do not believe that the financial statements are materially misstated as a result of fraud.
- 8. We have no knowledge of any fraud or suspected fraud affecting the CLTC involving:
 - a. Management.
 - b. Employees who have significant roles in internal control over financial reporting.
 - c. Others if the fraud could have a material effect on the financial statements.
- 7. We have no knowledge of any allegations of fraud or suspected fraud affecting the CLTC received in communications from employees, former employees, analysts, regulators, or others.
- 10. There are no unasserted claims or assessments that legal counsel has advised us are probable of assertion and must be disclosed in accordance with Governmental Accounting Standards Board (GASB) Codification of Governmental Accounting and Financial Reporting Standards ("GASB Codification") Section C50, Claims and Judgments, except as disclosed in note 9 to the financial statements.
- II. Significant assumptions used by us in making accounting estimates are reasonable.
- Management has identified and disclosed to you all laws and regulations that have a direct and material effect on the determination of financial statement amounts.
- 13. We have adopted the provisions of GASB Codification Section 2100, *Defining the Financial Reporting Entity*. We believe that we have properly identified and reported as a component unit of the CNMI each organization that meets the criteria established in GASB Codification Section 2100, *Defining the Financial Reporting Entity*.
 - Except where otherwise stated below, matters less than \$6,000 collectively are not considered to be exceptions that require disclosure for the purpose of the following representations. This amount is not necessarily indicative of amounts that would require adjustment to, or disclosure in, the basic financial statements.
- **14.** Except as described in Appendix A and Appendix B, there are no transactions that have not been properly recorded in the accounting records underlying the financial statements.
- 15. The CLTC has no plans or intentions that may affect the carrying value or classification of assets and liabilities.
- 16. The following, to the extent applicable, have been appropriately identified, properly recorded, and disclosed in the financial statements:
 - a. Related-party transactions and associated amounts receivable or payable, including sales, purchases, loans, transfers, leasing arrangements, and guarantees (written or oral).
 - b. Guarantees, whether written or oral, under which the CLTC is contingently liable.

ATTACHMENT I, CONTINUED

- 17. We have appropriately identified and properly recorded and disclosed in the financial statements all interfund transactions, including repayment terms.
- 18. Arrangements with financial institutions involving compensating balances or other arrangements involving restrictions on cash balances, line of credit, or similar arrangements have been properly disclosed in the financial statements.
- In preparing the financial statements in conformity with GAAP, management uses estimates. All estimates have been disclosed in the financial statements for which known information available prior to the issuance of the financial statements indicates that both of the following criteria are met:
 - a. It is at least reasonably possible that the estimate of the effect on the financial statements of a condition, situation, or set of circumstances that existed at the date of the financial statements will change in the near term due to one or more future confirming events.
 - b. The effect of the change would be material to the financial statements.
- 20. Risks associated with concentrations, based on information known to management, that meet all of the following criteria have been disclosed in the financial statements:
 - a. The concentration exists at the date of the financial statements.
 - b. The concentration makes the enterprise vulnerable to the risk of a near-term severe impact.
 - c. It is at least reasonably possible that the events that could cause the severe impact will occur in the near term.

21. There are no:

- a. Violations or possible violations of laws or regulations whose effects should be considered for disclosure in the financial statements or as a basis for recording a loss contingency.
- b. Other liabilities or gain or loss contingencies that are required to be accrued or disclosed by GASB Codification Section C50, *Claims and Judgments*, except as disclosed in note 9 to the financial statements.
- 22. The CLTC has satisfactory title to all owned assets, and there are no liens or encumbrances on such assets nor has any asset been pledged as collateral, except as disclosed in note 4 to the financial statements..
- 23. The CLTC has complied with all aspects of contractual agreements that may have an effect on the financial statements in the event of noncompliance.
- 24. No department or agency of the CLTC has reported a material instance of noncompliance to us.
- 25. The CLTC has identified all derivative instruments as defined by GASB Codification Section D40, *Derivative Instruments*, and appropriately recorded and disclosed such derivatives in accordance with GASB Codification Section D40.
- 26. No events have occurred after September 30, 2012, but before the date of this letter, the date the financial statements were available to be issued that require consideration as adjustments to or disclosures in the financial statements.

- 27. Regarding required supplementary information:
 - a. We confirm that we are responsible for the required supplementary information.
 - b. The required supplementary information is measured and presented in accordance with the Governmental Accounting Standards Board.
 - c. The methods of measurement and presentation of the supplementary information have not changed from those used in the prior period.

23. Regarding supplementary information:

- a. We are responsible for the fair presentation of the supplementary information in relation to the basic financial statements taken as a whole.
- b. We believe the supplementary information, including its form and content, is fairly presented in relation to the basic financial statements taken as a whole.
- c. The methods of measurement and presentation of the supplementary information have not changed from those used in the prior period.
- 24. Management is aware of its requirement to disclose whether, subsequent to September 30, 2012, any changes in internal control or other factors that might significantly affect internal control, including any corrective action taken by management with regard to significant deficiencies and material weaknesses have occurred. However, we represent to you that no such disclosure has been made as no such changes in internal control or such other factors have occurred.
- 30. During the year ended September 30, 2012, the CLTC implemented the following pronouncements:
 - GASB Statement No. 57, OPEB Measurements by Agent Employers and Agent Multiple-Employer Plans, which amends Statement No. 43, Financial Reporting for Postemployment Benefit Plans Other Than Pension Plans, and Statement No. 45, Accounting and Financial Reporting by Employers for Postemployment Benefits Other Than Pensions, and addresses issues related to the frequency and timing of measurements for actuarial valuations first used to report funded status information in OPEB plan financial statements. The implementation of this pronouncement did not have a material effect on the financial statements.
 - GASB Statement No. 64, *Derivative Instruments: Application of Hedge Accounting Termination Provisions* (an amendment of GASB Statement No. 53), which will improve financial reporting by state and local governments by clarifying the circumstances in which hedge accounting continues to be applied when a swap counterparty, or a swap counterparty's credit support provider, is replaced. The implementation of this pronouncement did not have a material effect on the financial statements.
- 31. During the year ended September 30, 2011, the CLTC implemented the following pronouncements:
 - GASB Statement No. 54, Fund Balance Reporting and Governmental Fund Type Definitions, which enhances the usefulness of fund balance information by providing clearer fund balance classifications that can be more consistently applied and by clarifying the existing governmental fund type definitions. The implementation of this pronouncement did not have a material effect on the financial statements.

- GASB Statement No. 59, Financial Instruments Omnibus, which updates and improves existing standards regarding financial reporting of certain financial instruments and external investment pools. The implementation of this pronouncement did not have a material effect on the financial statements.
- 32. In December 2010, GASB issued Statement No. 60, Accounting and Financial Reporting for Service Concession Arrangements, which addresses how to account for and report service concession arrangements (SCAs), a type of public-private or public-public partnership that state and local governments are increasingly entering into. The provisions of this statement are effective for periods beginning after December 15, 2011. Management does not believe that the implementation of this statement will have a material effect on the financial statements of the CLTC.
- 33. In December 2010, GASB issued Statement No. 61, The Financial Reporting Entity: Omnibus, which is designed to improve financial reporting for governmental entities by amending the requirements of Statements No. 14, The Financial Reporting Entity, and No. 34, Basic Financial Statements and Management's Discussion and Analysis for State and Local Governments, to better meet user needs and address reporting entity issues that have come to light since those Statements were issued in 1991 and 1999, respectively. The provisions of this statement are effective for periods beginning after June 15, 2012. Management does not believe that the implementation of this statement will have a material effect on the financial statements of the CLTC.
- 34. In December 2010, GASB issued Statement No. 62, Codification of Accounting and Financial Reporting Guidance Contained in Pre-November 30, 1989 FASB and AICPA Pronouncements, which is intended to enhance the usefulness of its Codification by incorporating guidance that previously could only be found in certain Financial Accounting Standards Board (FASB) and American Institute of Certified Public Accountants (AICPA) pronouncements. The provisions of this statement are effective for periods beginning after December 15, 2011. Management does not believe that the implementation of this statement will have a material effect on the financial statements of the CLTC.
- 35. In July 2011, GASB issued Statement No. 63, Financial Reporting of Deferred Outflows of Resources, Deferred Inflows of Resources, and Net Position, which establishes guidance for reporting deferred outflows of resources, deferred inflows of resources, and net position in a statement of financial position. The provisions of this statement are effective for periods beginning after December 15, 2011. Management does not believe that the implementation of this statement will have a material effect on the financial statements of the CLTC.
- 36. In April 2012, GASB issued Statement No. 65, Items Previously Reported as Assets and Liabilities, which clarifies the appropriate reporting of deferred outflows of resources and deferred inflows of resources to ensure consistency in financial reporting. The provisions of this statement are effective for periods beginning after December 15, 2012. Management has not yet determined the effect of implementation of this statement on the financial statements of the CLTC.
- In April 2012, GASB issued Statement No. 66, *Technical Corrections 2012*, which enhances the usefulness of financial reports by resolving conflicting accounting and financial reporting guidance that could diminish the consistency of financial reporting. The provisions of this statement are effective for periods beginning after December 15, 2012. Management has not yet determined the effect of implementation of this statement on the financial statements of the CLTC.

- In June 2012, GASB issued Statement No. 67, Financial Reporting for Pension Plans, which revises existing guidance for the financial reports of most pension plans, and Statement No. 68, Accounting and Financial Reporting for Pensions, which revises and establishes new financial reporting requirements for most governments that provide their employees with pension benefits. The provisions in Statement 67 are effective for financial statements for periods beginning after June 15, 2013. The provisions in Statement 68 are effective for fiscal years beginning after June 15, 2014. Management has not yet determined the effect of implementation of these statements on the financial statements of the CLTC.
- 39. Receivables recorded in the financial statements represent valid claims against debtors for sales or other charges arising on or before September 30, 2012 and 2011 and have been appropriately reduced to their estimated net realizable value.
- **40.** Quantitative and qualitative information regarding the allowance for doubtful accounts has been properly disclosed in the financial statements.
- 41. The CLTC is exposed to various risks of loss related to torts; theft of, damage to, and destruction of assets; errors and omissions; injuries to employees; and natural disasters. The CLTC has elected to purchase commercial insurance from independent third parties for the risks of loss to which it is exposed. Settled claims resulting from these risks have not exceeded commercial insurance coverage in any of the past three fiscal years.

Very truly yours,

Signed:

MICHAEL'J.B. BORJA

Title:

Director

Signed:

DAVID V. CAMACHO

Title:

Deputy Director

Signed:

JOSEPH B. CRUZ, JR.

Title:

Administrative Officer

APPENDIX A

	Assets		Liabilities		Equity	Income	
To correct overstatement of lease rental revenue	Dr.	(Cr.)	Dr.	(Cr.)	Dr. (Cr.)	Dr.	(Cr.)
	103,370			(106,174)		2,804	
	103,370			(106,174)		2,804	

APPENDIX B

	Assets		Liabilities		Equity		Income	
To correct overstatement of lease rental revenue	Dr.	(Cr.)	Dr.	(Cr.)	Dr.	(Cr.)	Dr.	(Cr.)
	100,883			(104,149)			3,266	
	100,883			(104,149)			3,266	

#	Name	Debit	Credit
OPERATION	S FUND: 1 AJE To record A/R and deferred revenue		
1100 2200	Accounts receivable Deferred revenue	354,761.30	354,761.30
2200	Data Tavanda	354,761.30	354,761.30
	2 AJE To correct GGRP revenue recordation		
362454201	Commercial lease/license	T:	4,400.00
162414100	Due to/from General Fund	4,400.00	2
		4,400.00	4,400.00
	3 AJE To correct Choice revenue recordation		
362454201	Commercial lease/license	-	2,078.16
162414100	Due to/from General Fund	2,078.16	-
		2,078.16	2,078.16
	4 AJE To correct IP&E revenue recordation		
362454201	Commercial lease/license	7,560.00	2.5
162414100	Due to/from General Fund		7,560.00
		7,560.00	7,560.00
	5 AJE To correct beginning fund balance		
162441110	Unappropriated surplus		17,000.00
362454201	Commercial lease/license	17,000.00	47.000.00
		17,000.00	17,000.00
	6 AJE To correct deferred revenue balance		
362454201	Commercial lease/license	our entered	26,000.00
2200	Deferred revenue	26,000.00	
		26,000.00	26,000.00
LOAN GUAR	ANTEE FUND: 1 AJE To record bank transactions		
1000	BOG (A/C 2501-002274)	200,355.09	
1001	BOG (A/C 0101-295976)	8,180.93	9
8003	Interest income	-	2,200.28
7001	Fund balance-Land Bank Trust	= = = =	506,335.74
1002	BOG TCD (A/C 0401-437964)	300,000.00	-
		508,536.02	508,536.02

I have reviewed the adjustments above and authorize that they be recorded in the General Ledger as of September 30, 2011. The adjustments are the result of errors and are not the result of fraud or illegal acts.

Joseph B. Øruz, Jr.

Administrative Officer

#	Name	Debit	Credit
OPERATION	S FUND:		
	1 AJE To record PY audit adjustments		
162441110	Unappropriated surplus	e .	24,918.16
162414100 1100	Due to/from General Fund Accounts receivable	354,761.30	1,081.84
2200	Deferred revenue	334,701.30	328,761.30
	50.01104.10101145	354,761.30	354,761.30
	2 AJE To reverse PY A/R and deferred revenue		
362454201	Commercial lease/license	26,000.00	5.27
1100	Accounts receivable	70.00 ±	354,761.30
2200	Deferred revenue	328,761.30	401.001.00
		354,761.30	354,761.30
000454004	3 AJE To correct JR Mateo revenue recordation	F 000 00	
362454201 162414100	Commercial lease/license Due to/from General Fund	5,000.00	5,000.00
102414100	Due to/nom deneral rund	5.000.00	5,000.00
	4 AJE To correct Tamuning Mart revenue recordation		
362454201	Commercial lease/license	1,000.00	1963
162414100	Due to/from General Fund		1,000.00
		1,000.00	1,000.00
	5 AJE To record CY A/R and deferred revenue		
1100	Accounts receivable	337,192.06	74S
2200	Deferred revenue	<u> </u>	337,192.06
	•	337,192.06	337,192.06
000454004	6 AJE To correct deferred revenue balance		
362454201 2200	Commercial lease/license Deferred revenue	25,780.00	25,780.00
2200	Deletion revenue	25,780.00	25,780.00
	-		
	7 AJE To correctly record sale of land proceeds		
162414100	Due to/from General Fund	20,017.00	-
362457207	Sale of Govt Land	20.017.00	20,017.00
	-	20,017.00	20,017.00
LOAN GUAR	ANTEE FUND:		
1000	1 AJE To record PY audit adjustments	000 055 00	
1000 1001	BOG (A/C 2501-002274) BOG (A/C 0101-295976)	200,355.09 8,180.93	
7001	Fund balance-Land Bank Trust	0,100.30	508,536.02
1002	BOG TCD (A/C 0401-437964)	300,000.00	-
	=	508,536.02	508,536.02
	2 AJE To record current year interest income		
1000	BOG (A/C 2501-002274)	251.28	*
1001 8003	BOG (A/C 0101-295976) Interest income	600.01	851.29
3000	INCOME INCOME	851.29	851.29
		to the control of a state of the	

I have reviewed the adjustments above and authorize that they be recorded in the General Ledger as of September 30, 2012. The adjustments are the result of errors and are not the result of fraud or illegal acts.

Joseph B. Cruz, Jr. Administrative Officer