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August 7, 2014

Ms. Anita F. Orlino Chairperson Guam Ancestral Lands Commission

Dear Ms. Orlino:

We have performed an audit of the financial statements of the Guam Ancestral Lands 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 their 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.

### 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**

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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 their compliance with certain provisions of laws, regulations, contracts and grant agreements.

We also noted certain matters that we reported to management of the Commission in a separate letter dated August 7, 2014.

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,





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



Street Address: 590 S. Marine Corps Drive Suite 733 ITC Building Tamuning, GU 96913 EDDIE BAZA CALVO Governor

RAY TENORIO Lieutenant Governor MICHAEL J.B. BORJA

DAVID V. CAMACHO Deputy Director

August 7, 2014

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#### Gentlemen:

We are providing this letter in connection with your audits of the balance sheets of the Guam Ancestral Lands Commission (GALC), 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 GALC'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 GALC 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 GALC has provided to you all relevant information and access as agreed in the terms of the audit engagement letter.
- 3. The GALC 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 GALC.
  - c. Financial records and related data for all financial transactions of the GALC and for all funds administered by the GALC. The records, books, and accounts, as provided to you, record the financial and fiscal operations of all funds administered by the GALC 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 GALC management that contravenes the provisions of federal laws and local laws and regulations, or of contracts and grants applicable to the GALC.

- 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. The GALC 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 GALC and do not believe that the financial statements are materially misstated as a result of fraud.
- 6. We have no knowledge of any fraud or suspected fraud affecting the GALC 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 GALC received in communications from employees, former employees, analysts, regulators, or others.
- 8. 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 8 to the financial statements.
- 9. Significant assumptions used by us in making accounting estimates are reasonable.
- 10. 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.
- 11. 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.
- 12. There are no transactions that have not been properly recorded in the accounting records underlying the financial statements.
- 13. The GALC has no plans or intentions that may affect the carrying value or classification of assets and liabilities.

14. 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), specifically, as follows:
  - i. The GALC is a governmental fund of GovGuam and is therefore affiliated with all GovGuam-owned and affiliated entities, including all departments and agencies of GovGuam, including the Guam Economic Development Authority (GEDA), the Guam Environmental Protection Agency, and the Guam Department of Public Health and Social Services. During the years ended September 30, 2012 and 2011, the GALC recognized certain on-behalf payments as contributions from GovGuam, totaling \$179,155 and \$215,076, respectively, representing certain payroll and related expenditures that GovGuam paid directly on behalf of the GALC.
  - ii. Certain developed land supported by valid lease agreements is held as investments in land and other real estate within a permanent fund of the Government of Guam. Such investment is recorded at fair value whereas other undeveloped land not supported by lease agreements is reported at historical cost. As of September 30, 2012 and 2011, such land is valued at \$406,640,273 and \$393,242,611, respectively, of which \$6,759,894 and \$6,122,330, is held by the GALC. Fair value is based on estimated current value (primarily assessed real estate property tax valuations) and appraisals. Investments that do not have an established market are reported at estimated fair value. Earnings from lease agreements associated with these investments are reported as revenues of the GALC.
- b. Guarantees, whether written or oral, under which the GALC is contingently liable.
- 15. We have appropriately identified and properly recorded and disclosed in the financial statements all interfund transactions, including repayment terms.
- 16. 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.
- 17. 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.

18. 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.

#### 19. 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 8 to the financial statements.
- **20**. The GALC 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.
- 21. The GALC has complied with all aspects of contractual agreements that may have an effect on the financial statements in the event of noncompliance.
- **22**. No department or agency of the GALC has reported a material instance of noncompliance to us.
- 23. The GALC 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.
- 24. 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.
- 25. 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.
- **2**6. 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.
- 27. 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.
- 28. During the year ended September 30, 2012, the GALC 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.
- 29. During the year ended September 30, 2011, the GALC 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.

- 30. 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 GALC.
- 31. 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 GALC.
- 32. 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 GALC.
- **3**3. 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 GALC.
- 34. 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 GALC.
- 35. 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 GALC.

- 3.6. 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 GALC.
- 37. 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.
- 38. Quantitative and qualitative information regarding the allowance for doubtful accounts has been properly disclosed in the financial statements.
- 39. The GALC 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 GALC 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 JB. BOR

Title:

Director

Signed:

DAVID'V PAMACHO

Title:

**Deputy Director** 

Signed:

JOSEPH BACRUZ, JR.

Title:

**Administrative Officer** 

#	Name	Debit	Credit
OPERATIO	ONS FUND:		
	1 AJE To record bank transactions		
1003	BOH Operations (A/C 0038-231057)	1,100.00	
8200	Transfer in	-	1,100.00
		1,100.00	1,100.00
LAND BAI	NK TRUST FUND:		
	1 AJE To record bank transactions		
1000	FHB Land Bank Trust (A/C 03-922405)	1,482,055.87	2
1001	BOH Land Bank Trust (A/C 6838-000217)	170,245.51	*
8003	Interest income		1,701.57
8004	Other revenue	¥5	3,063.00
8108	Inactive account service fee	20.00	
7001	Fund balance-Land Bank Trust	<b>3</b>	1,054,504.88
8000	Base Rent revenue	- F	578,036.43
8001	Participation Rent revenue	is a	15,010.45
8005	Other deposits		5.05
		1,652,321.38	1,652,321.38
	2 AJE To correct beginning fund balance		
7001	Fund balance-Land Bank Trust	-	52,362.70
8000	Base Rent revenue	52,362.70	02,0020
		52,362.70	52,362.70
	3 AJE To record A/R and deferred revenue		
8000.1	Base Rent revenue - Matson	141	24,804.20
2200	Deferred revenue		354,927.40
1101	Allowance for doubtful accounts	107 111 10	8,400.00
1100	Accounts receivable	427,414.40	40,000,00
8000.6	Base Rent revenue - GEPA	-	16,000.00
8000.4	Base Rent revenue - Balli Steel	1.5	7,282.80
8000.7	Base Rent revenue - DPHSS	427,414.40	16,000.00 427,414.40
		427,414.40	427,414.40
	4 AJE To record GEDA accrual		
2400	Due to GEDA		9,164.44
8110	GEDA management fees	9,164.44	
		9,164.44	9,164.44
	5 AJE To record lessee deposit payable		
2300	Security deposits payable	( e)	127,213.20
1300	Due from GEDA	127,213.20	
		127,213.20	127,213.20
	NER'S RECOVERY FUND:		
FAIADOAAI	1 AJE To record bank transactions		
1002	BOH Landowners Recovery (A/C 6838-000071)	13,654.88	2
8003	Interest income	10,054.00	17.49
8004	Other revenue		33.00
8109	Withdrawals	7,803.08	-
8201	Transfer out	1,100.00	
7002	Fund balance-Landowners Recovery Fund	1,100.00	22,507.47
	Salarios Earlastinisto Hosovory I dila	22,557.96	22,557.96

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. Cruz, Jr. Administrative Officer

#	Name	Debit	Credit
OPERATION	ONS FUND:		
	1 AJE To record bank transactions		
1003	BOH Operations (A/C 0038-231057)	₹	259.75
8200	Transfer in	-	3,000.00
8004	Other revenue	=	106.00
8112	Miscellaneous expenditures	3,365.75	
		3,365.75	3,365.75
I AND BAI	NK TRUST FUND:		
LAND DAI	1 AJE To record bank transactions		
1000	FHB Land Bank Trust (A/C 03-922405)	2	1,482,055.87
1001	BOH Land Bank Trust (A/C 6838-000217)		92,569.69
8003	Interest income	~ 	3,025.08
8004	Other revenue		7,000.00
8108	Inactive account service fee	10.00	7,000.00
8000	Base Rent revenue	10.00	596,301.21
8001	Participation Rent revenue	2	12,340.34
8200	Transfer in	2	1,200.00
8201	Transfer out	1,200.00	1,200.00
8111	Court judgment	92,630.98	
1004	Coast 360 Land Bank Trust (A/C 236454)	2,100,651.21	
1001	Count Goo Land Bank Trast (TV C 200404)	2,194,492.19	2,194,492.19
			2,101,102.10
	2 AJE To reverse PY A/R & revenue accrual		
2200	Deferred revenue	354,927.40	
1101	Allowance for doubtful accounts	8,400.00	-
1100	Accounts receivable	· ·	363,327.40
1100	Accounts receivable	-	64,087.00
2400	Due to GEDA	9,164.44	-
8000	Base Rent revenue	54,922.56	-
		427,414.40	427,414.40
	3 AJE To record A/R and deferred revenue		
2200	Deferred revenue		27 904 20
1101	Allowance for doubtful accounts	#F	27,804.20
1100	Accounts receivable	372,204.20	35,400.00
8000.6	Base Rent revenue - GEPA	372,204.20	16,000,00
8000.4	Base Rent revenue - GEFA Base Rent revenue - Balli Steel	•	16,000.00
8000.4	Base Rent revenue - DPHSS		5,000.00
0000.7	Dase nent revenue - DFR33	372,204.20	288,000.00 372,204.20
	4 AJE To record GEDA accrual		
2400	Due to GEDA	<del>-</del> :	44,187.00
8110	GEDA management fees	44,187.00	
		44,187.00	44,187.00
LANDOW	NER'S RECOVERY FUND:		
FV:4D() 441	1 AJE To record bank transactions		
1002	BOH Landowners Recovery (A/C 6838-000071)	24	2,806.50
8003	Interest income	=	2,606.50 7.50
8003	Other revenue		186.00
8201	Transfer out	3,000.00	100.00
0201	Hansiel Out	3,000.00	3,000.00
		3,000.00	3,000.00

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