

March 5, 2009

Board of Directors  
Guam Visitors Bureau:

Dear Members of the Board of Directors:

In planning and performing our audit of the financial statements of the Guam Visitors Bureau (GVB) as of and for the year ended September 30, 2008 (on which we have issued our report dated March 5, 2009), in accordance with auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States, we considered GVB'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 GVB's internal control over financial reporting. Accordingly, we do not express an opinion on the effectiveness of GVB's internal control over financial reporting.

Our consideration of internal control over financial reporting was for the limited purpose described in the preceding paragraph and was not designed to identify all deficiencies in internal control over financial reporting. However, in connection with our audit, we identified, and included in the attached Appendix I, deficiencies related to GVB's internal control over financial reporting and other matters as of September 30, 2008 that we wish to bring to your attention.

We have also issued a separate report to the Board of Directors and management, also dated March 5, 2009, on our consideration of GVB's internal control over financial reporting and on our tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements and other matters.

The definition of a deficiency is also set forth in the attached Appendix I.

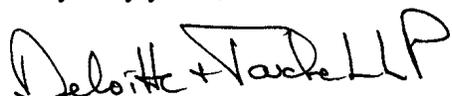
A description of the responsibility of management for establishing and maintaining internal control over financial reporting and of the objectives of and inherent limitations of internal control over financial reporting, is set forth in the attached Appendix II and should be read in conjunction with this report.

This report is intended solely for the information and use of the Board of Directors, management, others within the organization, and the Office of the Auditor-General and is not intended to be and should not be used by anyone other than these specified parties.

We will be pleased to discuss the attached comments with you and, if desired, to assist you in implementing any of the suggestions.

We wish to thank the staff and management of GVB for their cooperation and assistance during the course of this engagement.

Very truly yours,



**SECTION I – OTHER MATTERS**

We identified, and have included below, other matters involving GVB's internal control over financial reporting as of September 30, 2008 that we wish to bring to your attention:

**1. Unreconciled Account**

Comment: The beginning fund balance for fiscal year 2008 does not agree with that of the prior year in the amount of \$66,378. This appears to have occurred because GVB modified its account structure and was not able to reconcile accounts in a timely manner.

Recommendation: We recommend that all accounts be reconciled in a timely manner.

**2. Procurement**

Comment: Proper competitive procurement does not appear to have been exercised over the following transactions:

Check No.	Date	Invoice No.	Amount
1433	4/11/2008	OT6217	\$ 114,028
1436	6/17/2008	OT6329	42,193
1437	10/2/2008	OT6486	13,880

Recommendation: We recommend that GVB adhere to established procurement regulations.

**3. Procurement, No Supporting Documentation**

Comment: Documentation of appropriate procurement procedures was not made available for the following transactions.

Check No.	Date	Invoice No.	Amount
KO GSA0-7/FY08	9/1/2008	GVB08-007	\$ 21,441
KO GSA0-8/FY08	9/30/2008	GVB08-008	24,752

Recommendation: Documentation of competitive procurement procedures should be maintained.

**4. Grants**

Comment: GVB did not always ensure that grants were provided to legitimate/legal non-profit organizations.

Recommendation: Proof of legitimate/legal non-profit status should be obtained before grants are provided to organizations.

**SECTION II – DEFINITION**

The definition of a control deficiency that is established in AU 325, *Communicating Internal Control Related Matters Identified in an Audit*, is as follows:

A *control deficiency* 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 misstatements on a timely basis. A deficiency in *design* exists when (a) a control necessary to meet the control objective is missing or (b) an existing control is not properly designed so that, even if the control operates as designed, the control objective is not always met. A deficiency in *operation* exists when a properly designed control does not operate as designed, or when the person performing the control does not possess the necessary authority or qualifications to perform the control effectively.

## **MANAGEMENT'S RESPONSIBILITY FOR, AND THE OBJECTIVES AND LIMITATIONS OF, INTERNAL CONTROL OVER FINANCIAL REPORTING**

The following comments concerning management's responsibility for internal control over financial reporting and the objectives and inherent limitations of internal control over financial reporting are adapted from auditing standards generally accepted in the United States of America.

### **Management's Responsibility**

GVB's management is responsible for the overall accuracy of the financial statements and their conformity with generally accepted accounting principles. In this regard, management is also responsible for establishing and maintaining effective internal control over financial reporting.

### **Objectives of Internal Control over Financial Reporting**

Internal control over financial reporting is a process affected by those charged with governance, management, and other personnel and designed to provide reasonable assurance about the achievement of the entity's objectives with regard to reliability of financial reporting, effectiveness and efficiency of operations, and compliance with applicable laws and regulations. Internal control over the safeguarding of assets against unauthorized acquisition, use, or disposition may include controls related to financial reporting and operations objectives. Generally, controls that are relevant to an audit of financial statements are those that pertain to the entity's objective of reliable financial reporting (i.e., the preparation of reliable financial statements that are fairly presented in conformity with generally accepted accounting principles).

### **Inherent Limitations of Internal Control over Financial Reporting**

Because of the inherent limitations of internal control over financial reporting, including the possibility of collusion or improper management override of controls, material misstatements due to error or fraud may not be prevented or detected on a timely basis. Also, projections of any evaluation of the effectiveness of the internal control over financial reporting to future periods are subject to the risk that the controls may become inadequate because of changes in conditions, or that the degree of compliance with the policies or procedures may deteriorate.