

**CARLSTADT BOARD OF EDUCATION
AUDITOR'S MANAGEMENT REPORT ON
ADMINISTRATIVE FINDINGS -
FINANCIAL, COMPLIANCE AND PERFORMANCE
JUNE 30, 2023**

**CARLSTADT BOARD OF EDUCATION
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- FINANCIAL, COMPLIANCE AND PERFORMANCE**

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LERCH, VINCI & BLISS, LLP

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AUDITOR'S MANAGEMENT REPORT

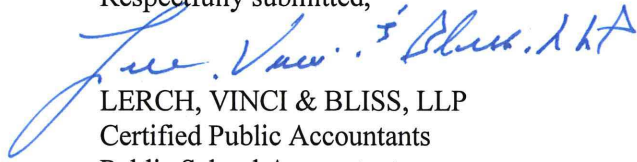
Honorable President and Members
of the Board of Trustees
Carlstadt Board of Education
Carlstadt, New Jersey

We have audited in accordance with auditing standards generally accepted in the United States of America and Government Auditing Standards issued by the Comptroller General of the United States, the basic financial statements of the Carlstadt Board of Education as of and for the fiscal year ended June 30, 2023, and have issued our report thereon dated December 21, 2023.

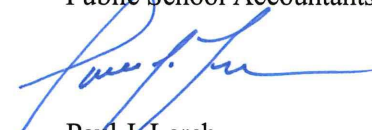
As part of our audit, we performed procedures required by the Office of School Finance, Department of Education, State of New Jersey and the findings and results thereof are disclosed on the following pages, as listed in the accompanying table of contents.

This report is intended for the information and use of management, the Board of Trustees, others within the District and the New Jersey State Department of Education. However, this report is a matter of public record and its distribution is not limited.

Respectfully submitted,



LERCH, VINCI & BLISS, LLP
Certified Public Accountants
Public School Accountants



Paul J. Lerch
Public School Accountant
PSA Number CS01118

Fair Lawn, New Jersey
December 21, 2023

**CARLSTADT BOARD OF EDUCATION
ADMINISTRATIVE FINDINGS - FINANCIAL, COMPLIANCE AND PERFORMANCE REPORTING
FOR THE FISCAL YEAR ENDED JUNE 30, 2023**

Scope of Audit

The audit covered the financial transactions of the Board Secretary/School Business Administrator, the activities of the Board of Education, and the records of the various funds under the auspices of the Board of Education.

Administrative Practices and Procedures

Insurance

Fire insurance coverage was carried in the amounts as detailed on Exhibit J-20, Insurance Schedule contained in the district's Annual Comprehensive Financial Report ("ACFR").

Official Bonds (N.J.S.A. 18A:17-26, 18A:17-32)

<u>Name</u>	<u>Position</u>	<u>Amount</u>
Paul Roth	Interim - Board Secretary/School Business Administrator	\$200,000

There is Public Employees' Dishonesty coverage with Selective Insurance Company of America covering all other employees with coverage of \$500,000 per loss.

P.L. 2020,C.44

Our audit procedures included an inquiry and subsequent review of health benefit data required per N.J.S.A. 18A:16-13.3 (Chapter 44) submitted for the year on audit. The Chapter 44 summary report was reviewed for reasonableness and timeliness.

The data submitted did include all health benefit plans offered by school district.

The school district data certification was completed by the chief school administrator. The school district Chapter 44 data was submitted timely.

Tuition Charges

A comparison of tentative tuition charges and actual certified tuition charges was made. The District was not required to make any adjustments for the prior year.

Financial Planning, Accounting and Reporting

Examination of Claims

An examination of claims paid during the period under review did not indicate any discrepancies with respect to signatures, certification or supporting documentation.

Payroll Account

The net salaries of all employees of the Board were deposited in the Payroll Account. Employees' payroll deductions and employer's share of payroll taxes were deposited in the Payroll Agency Account.

All payrolls tested were approved by the Superintendent and were certified by the President of the Board and the Board Secretary/Business Administrator.

Salary withholdings were promptly remitted to the proper agencies, including health benefits premium amounts withheld due to the General Fund.

Payrolls were delivered to the Secretary of the Board who then deposited with warrants in separate bank accounts for net payroll and withholdings.

**CARLSTADT BOARD OF EDUCATION
ADMINISTRATIVE FINDINGS - FINANCIAL, COMPLIANCE AND PERFORMANCE REPORTING
FOR THE FISCAL YEAR ENDED JUNE 30, 2023**

Financial Planning, Accounting and Reporting (Continued)

Payroll Account (Continued)

The School Business Administrator completed and filed the required Certification (E-CERT1) of Compliance with Federal and State Law respecting the reporting of compensation of certain employees.

The Board has implemented and maintains a personnel tracking and accounting (Position Control) system.

Reserve for Encumbrances and Accounts Payable

A review of outstanding issued purchase orders was made as of June 30, for goods not yet received or services not yet rendered and it was determined that no blanket purchase orders were included in the balance of the year end encumbrances. Also, unpaid purchase orders included in the balance of accounts payable were reviewed for propriety and to determine that goods were received and services were rendered, as of June 30.

Classification of Expenditures

The coding of expenditures was tested for proper classification in accordance with N.J.A.C. 6A:23A-16.2(f) as part of our test of transactions of randomly selected expenditure items. We also reviewed the coding of all expenditures included in our compliance and single audit testing procedures. In addition to randomly selecting a test sample, our sample selection specifically targeted administrative coding classifications to determine overall reliability and compliance with N.J.A.C. 6A:23A-8.3. As a result of the procedures performed, no additional testing was deemed necessary to test the propriety of expenditure classifications.

Travel

The District had an approved board travel policy as required by N.J.A.C. 6A:23A-6.13 and N.J.S.A. 18A:11-12.

Board Secretary's Records

The financial records, books of account and minutes maintained by the Board Secretary were in good condition.

The Board Secretary's and Treasurer's reports were presented monthly to the Board on a timely basis and were submitted to the executive county superintendent as prescribed by (N.J.S.A. 18A:17-9 and 18A:17-36).

Acknowledgment of the Board's receipt of the Board Secretary's and Treasurer's monthly financial reports was included in the minutes.

The prescribed contractual order system was followed.

Unemployment Compensation Insurance Trust Fund

The Board has adopted the contribution method and has established an Unemployment Compensation Insurance Trust Fund. The financial transactions of this fund are reported in the General Fund.

Elementary and Secondary Education Act (E.S.E.A.)/as Amended by the Every Student Succeeds Act (ESSA)

The E.S.E.A. financial exhibits are contained within the Special Revenue Fund of the ACFR. This section of the ACFR documents the financial position pertaining to projects under Title I through Title IV of the Elementary and Secondary Education Act as amended and reauthorized.

Our examination of the E.S.E.A. funds on a test basis indicated that obligations and expenditures were incurred during the fiscal year or project period for which the project was approved.

**CARLSTADT BOARD OF EDUCATION
ADMINISTRATIVE FINDINGS - FINANCIAL, COMPLIANCE AND PERFORMANCE REPORTING
FOR THE FISCAL YEAR ENDED JUNE 30, 2023**

Financial Planning, Accounting and Reporting (Continued)

Other Special Federal and/or State Projects

The District's Special Projects were approved as listed on Exhibit K-3 and K-4 located in the ACFR.

Our audit of the Federal and State funds on a test basis indicated that obligations and expenditures were incurred during the fiscal year or project period for which the project was approved.

The financial exhibits are contained with the Special Revenue section of the ACFR. This section of the ACFR documents the financial position pertaining to the aforementioned special projects.

Finding 2023-001: Per the compliance testing of the ESSER Grant, it was noted that resolutions were not passed approving the use of ESSER funds to cover salaries.

Recommendation: It is recommended that all salaries covered by the ESSER Grant be approved by resolution.

TPAF Reimbursements

Our audit procedures included a test of the semi-monthly reimbursement forms filed with the Department of Education for district employees who are members of the Teachers Pension and Annuity Fund.

TPAF Reimbursement to the State for Federal Salary Expenditures

The amount of the expenditure charged to the current year's Final Report for all federal awards for the school district to reimburse the State for the TPAF/FICA payments made by the State on-behalf of the school district for those employees whose salaries are identified as being paid from federal funds was made prior to the end of the 90 day grant liquidation period required by the Office of Grants Management. The expenditure was reviewed subsequent to the reimbursement and no exceptions were noted.

School Purchasing Programs

Contracts and Agreements Requiring Advertisement for Bids

The bid thresholds in accordance with N.J.S.A. 18A:18A-2 and 18A:18A-3(a) are \$44,000 (with a Qualified Purchasing Agent) and \$32,000 (without a Qualified Purchasing Agent), respectively. The law regulating bidding for public school student transportation contracts under N.J.S.A. 18A:39-3 is \$20,000 for 2022-23.

The Board of Education has the responsibility of determining whether the expenditures in any category will exceed the statutory thresholds within the fiscal year. Where question arises as to whether any contract or agreement might result in violation of the statute, the Board Attorney's opinion should be sought before a commitment is made.

Inasmuch as the system of records did not provide for an accumulation of payments for categories for the performance of any work or the furnishing or hiring of any materials or supplies, the results of such an accumulation could not reasonably be ascertained. Disbursements were reviewed; however, to determine whether any clear-cut violations existed.

The results of our examination indicated that no individual payments, contracts, or agreements were made "for the performance of any work or the furnishing or hiring of any materials or supplies," in excess of the statutory thresholds where there had been no advertising for bids in accordance with the provision of N.J.S.A. 18A:18A-4.

Resolutions were adopted authorizing the awarding of contracts or agreements for "Professional Services" per N.J.S.A. 18A:18A-5.

The system of records did not provide for an accumulation of purchases for which the school board used contracts entered into by the State Department of Purchase and Property pursuant to Ch. 114, P.L. 1977, therefore, the extent of such purchases could not reasonably be ascertained. Our examination did reveal, however, that purchases were made through the use of State contracts.

**CARLSTADT BOARD OF EDUCATION
ADMINISTRATIVE FINDINGS - FINANCIAL, COMPLIANCE AND PERFORMANCE REPORTING
FOR THE FISCAL YEAR ENDED JUNE 30, 2023**

Food Service Fund

SFAs were authorized to solicit and award emergency noncompetitive procurements and contracts with Food Service Management Companies in accordance with 2 CFR 200.320 and N.J.S.A. 18A:18A-7. The SFAs were also authorized to submit contract modifications to their existing Cost Reimbursable or Fixed Price contracts as necessary to ensure the feeding of all children throughout the age of 18, as well as persons over 18 with disabilities as defined in the regulations.

SFAs were notified of the requirement to maintain and report separate meal count records and financial records of all applicable costs incurred in providing meals to all student during the emergency.

The school food service program was not selected as a major federal and/or State program. However, the program expenditures exceeded \$100,000 in federal support. Accordingly, we inquired of school management, or appropriate school food service personnel, as to whether the School Food Authority (SFA) had any Child Nutrition Program reimbursement overclaims or underclaims. Exceptions were not noted.

We also inquired of school management, or appropriate school food service personnel, as to whether the SFA's expenditures of school food service revenues were limited to allowable direct and indirect costs. Exceptions were not noted.

Non-program foods were purchased, prepared and offered for sale.

The Statement of Revenues, Expenses, and Changes in Fund Net Assets (ACFR Schedule B-5) does separate program and non-program revenue and program and non-program cost of goods sold.

We inquired of management about the public health emergency procedures/practices that the SFA instituted to provide meals to all students, maintenance of all applicable production records; meal counts; noncompetitive procurements; modification of existing contracts and applicable financial records to document the specific costs applicable to the emergency operations. We also inquired if the FSMC received a loan in accordance with Payroll Protection Plan and whether the funds were used to pay for costs applicable to the Food Service Programs. We also inquired if the PPP loan was subsequently forgiven and noted the FSMC refunded the applicable amounts to the SFA during the 2022/2023 school year.

Net cash resources did not exceed three months average expenditures.

Student Body Activities

The Board has a policy which clearly established the regulation of student activity funds.

All receipts tested were deposited in a timely manner.

All cash disbursements tested had proper supporting documentation.

The financial records of the student body activity funds were maintained in good condition.

Application for State School Aid

Our audit procedures included a test of information reported in the October 14, 2022 Application for State School Aid (A.S.S.A.) for on-roll, private schools for the disabled, low-income and bilingual. We also performed a review of the district procedures related to its completion. The information on the A.S.S.A. was compared to the district workpapers with no exceptions noted. The information that was included on the workpapers was verified without exceptions noted. The results of our procedures are presented in the Schedule of Audited Enrollments.

The District has adequate written procedures for the recording of student enrollment data.

The District maintained workpapers on the prescribed state forms or their equivalent.

**CARLSTADT BOARD OF EDUCATION
ADMINISTRATIVE FINDINGS - FINANCIAL, COMPLIANCE AND PERFORMANCE REPORTING
FOR THE FISCAL YEAR ENDED JUNE 30, 2023**

Pupil Transportation

Our audit procedures included a test of on roll status reported in the 2022-23 District Report of Transported Resident Students (DRTRS). The information that was included on the DRTRS was verified to the DRTRS Eligibility Summary Report without exception. The results of our procedures are presented in the Schedule of Audit Enrollments.

Our procedures also included a review of transportation-related contracts and purchases. Based on our review, the district complied with proper bidding procedures and award of contracts. No exceptions were noted in our review of transportation related purchases of goods and services.

Facilities and Capital Assets

Our procedures included a review of the transfer of local funds from the general fund or from the capital reserve account, and awarding the contracts for eligible facilities construction. The District had no SDA grant projects during the current year.

Testing for Lead of all Drinking Water in Education Facilities

The school district adhered to all the requirements of N.J.A.C. 26-1.2 and 12.4 related to the testing for lead of all drinking water in educational facilities.

The school district submitted the annual Statement of Assurance to the Department of Education, pursuant to N.J.A.C. 6A:26-12.4(g).

Follow Up On Prior Year Findings

In accordance with government auditing standards, our procedures included a review of all prior year recommendations including findings.

Suggestion to Management

- A formal policy on the use of Store Cards be approved.

**CARLSTADT BOARD OF EDUCATION
FOOD SERVICE FUND
SCHEDULE OF MEAL COUNT ACTIVITY
NUMBER OF MEALS SERVED AND (OVER)/UNDERCLAIM
ENTERPRISE FUNDS
FOR THE FISCAL YEAR ENDED JUNE 30, 2023**

**NOT APPLICABLE –
INFORMATION IS NOT REQUIRED**

**CARLSTADT BOARD OF EDUCATION
FOOD SERVICE FUND
NET CASH RESOURCE SCHEDULE
ENTERPRISE FUNDS
FOR THE FISCAL YEAR ENDED JUNE 30, 2023**

		Food Service
<u>Net Cash Resources:</u>		
CAFR	*	
B-4		
Current Assets		
B-4	Cash & Cash Equiv.	\$ 111,611
B-4	Due from Other Gov'ts	9,569
Current Liabilities		
B-4	Less Accounts Payable	(8,694)
B-4	Less Due to Other Funds	(39,567)
B-4	Less Deferred Commodities	(2,799)
Net Cash Resources		<u>\$ 70,120</u>

Net Adj. Total Operating Expense:

B-5	Tot. Operating Exp.	354,240
B-5	Less Depreciation	(1,072)
	Adj. Tot. Oper. Exp.	<u>\$ 353,168</u>

Average Monthly Operating Expense:

\$ 35,317

Three times monthly Average:

\$ 105,950

NET CASH RESOURCES	\$	70,120
LESS THREE TIMES MONTHLY AVERAGE EXPENSES	\$	105,950
NET	\$	(35,830)

Net cash resources are below 3 X average monthly operating expenses by \$35,830.

**CARLSTADT BOARD OF EDUCATION
APPLICATION FOR STATE SCHOOL AID
SCHEDULE OF AUDITED ENROLLMENTS
OCTOBER 14, 2022**

	2023-2024 Applications						Sample for Verification						Private Schools for Disabled			
	Reported on A.S.S.A. On Roll		Reported on Workpapers On Roll		Errors		Sample Selected from Workpapers		Verified per Register On Roll		Errors per Registers On Roll		Reported on A.S.S.A. as Private Schools	Sample for Verifi- cation	Sample Verified	Sample Errors
	Full	Shared	Full	Shared	Full	Shared	Full	Shared	Full	Shared	Full	Shared				
Half Day Preschool - 3 years		-		-	-	-		-		-	-	-				
Full Day Preschool - 3 years		-		-	-	-		-		-	-	-				
Half Day Preschool - 4 years	28	-	28	-	-	-	28	-	28	-	-	-				
Full Day Preschool - 4 years		-		-	-	-		-		-	-	-				
Half Day Kindergarten		-		-	-	-		-		-	-	-				
Full Day Kindergarten	51	-	51	-	-	-	51	-	51	-	-	-				
1st Grade	58	-	58	-	-	-	58	-	58	-	-	-				
2nd Grade	54	-	54	-	-	-	54	-	54	-	-	-				
3rd Grade	43	-	43	-	-	-	43	-	43	-	-	-				
4th Grade	36	-	36	-	-	-	36	-	36	-	-	-				
5th Grade	45	-	45	-	-	-	45	-	45	-	-	-				
6th Grade	40	-	40	-	-	-	40	-	40	-	-	-				
7th Grade	48	-	48	-	-	-	48	-	48	-	-	-				
8th Grade	47	-	47	-	-	-	47	-	47	-	-	-				
9th Grade	-	-	-	-	-	-	-	-	-	-	-	-				
10th Grade	-	-	-	-	-	-	-	-	-	-	-	-				
11th Grade	-	-	-	-	-	-	-	-	-	-	-	-				
12th Grade	-	-	-	-	-	-	-	-	-	-	-	-				
Subtotal	450	-	450	-	-	-	450	-	450	-	-	-				
Spec Ed - Elementary	47	-	47	-	-	-	47	-	47	-	-	-	2	2	2	
Spec Ed - Middle School	28	-	28	-	-	-	28	-	28	-	-	-	2	2	2	
Spec Ed - High School	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Subtotal	75	-	75	-	-	-	75	-	75	-	-	-	4	4	4	-
Totals	525	-	525	-	-	-	525	-	525	-	-	-	4	4	4	-
Percentage Error					0.00%	0.00%							0.00%	0.00%		0.00%

**CARLSTADT BOARD OF EDUCATION
APPLICATION FOR STATE SCHOOL AID
SCHEDULE OF AUDITED ENROLLMENTS
OCTOBER 14, 2022**

	Resident Low Income			Sample for Verification			Resident LEP Low Income			Sample for Verification		
	Reported on A.S.S.A as Low Income	Reported on Workpapers as Low Income	Errors	Sample Selected from Workpapers	Verified to Application and Register	Sample Errors	Reported on A.S.S.A as Low Income	Reported on Workpapers as Low Income	Errors	Sample Selected from Workpapers	Verified to Application and Register	Sample Errors
Half Day Preschool (3 Yrs)			-			-			-			-
Full Day Preschool (3 Yrs)			-			-			-			-
Half Day Preschool (4 Yrs)			-			-			-			-
Full Day Preschool (4 Yrs)			-			-			-			-
Half Day Kindergarten			-			-			-			-
Full Day Kindergarten	16	16	-	5	5	-	5	5	-	2	2	-
1st Grade	19	19	-	6	6	-	5	5	-	2	2	-
2nd Grade	20	20	-	6	6	-	7	7	-	2	2	-
3rd Grade	13	13	-	4	4	-	2	2	-			-
4th Grade	10	10	-	3	3	-	2	2	-	1	1	-
5th Grade	12	12	-	4	4	-	3	3	-	1	1	-
6th Grade	11	11	-	3	3	-	1	1	-			-
7th Grade	14	14	-	4	4	-			-			-
8th Grade	16	16	-	5	5	-	3	3	-			-
9th Grade	-	-	-			-	-	-	-			-
10th Grade	-	-	-			-	-	-	-			-
11th Grade	-	-	-			-	-	-	-			-
12th Grade	-	-	-			-	-	-	-			-
Subtotal	131	131	-	40	40	-	28	28	-	8	8	-
Spec Ed - Elementary	20	20	-	6	6	-	9	9	-	3	3	-
Spec Ed - Middle School	19	19	-	6	6	-	4	4	-	1	1	-
Spec Ed - High School	-	-	-			-	-	-	-			-
Subtotal	39	39	-	12	12	-	13	13	-	4	4	-
Totals	170	170	-	52	52	-	41	41	-	12	12	-
Percentage Error			<u>0.00%</u>			<u>0.00%</u>			<u>0.00%</u>			<u>0.00%</u>

	Transportation			Tested	Verified	Errors
	Reported on DRTRS by DOE	Reported on DRTRS by District	Errors			
Regular - Public			-			-
Transported - Non-Public			-			-
Regular - Spec.			-			-
Special Needs - Public	15	15	-	5	5	-
Totals	15	15	-	5	5	-
			<u>0.00%</u>			<u>0.00%</u>

**CARLSTADT BOARD OF EDUCATION
APPLICATION FOR STATE SCHOOL AID
SCHEDULE OF AUDITED ENROLLMENTS
OCTOBER 14, 2022**

	LEP Not Low Income			Sample for Verification		
	Reported on A.S.S.A as Low Income	Reported on Workpapers as Low Income	Errors	Sample Selected from Workpapers	Verified to Register	Sample Errors
Half Day Preschool (3 Yrs)			-			-
Full Day Preschool (3 Yrs)			-			-
Half Day Preschool (4 Yrs)			-			-
Full Day Preschool (4 Yrs)			-			-
Half Day Kindergarten	-	-	-	-	-	-
Full Day Kindergarten	2	2	-			-
1st Grade	3	3	-	1	1	-
2nd Grade	9	9	-	3	3	-
3rd Grade	3	3	-	1	1	-
4th Grade	-	-	-			-
5th Grade	1	1	-			-
6th Grade	-	-	-			-
7th Grade	2	2	-	1	1	-
8th Grade			-			-
9th Grade	-	-	-			-
10th Grade	-	-	-			-
11th Grade	-	-	-			-
12th Grade	-	-	-			-
Subtotal	20	20	-	6	6	-
Spec Ed - Elementary	5	5	-	2	2	-
Spec Ed - Middle School			-			-
Spec Ed - High School	-	-	-			-
Subtotal	5	5	-	2	2	-
Totals	25	25	-	8	8	-
Percentage Error			<u>0.00%</u>			<u>0.00%</u>

**CARLSTADT BOARD OF EDUCATION
CALCULATION OF EXCESS SUPLUS
FOR THE FISCAL YEAR ENDED JUNE 30, 2023**

SECTION 1 - Regular District

2022-2023 Total General Fund Expenditures per the ACFR	\$ 17,832,676
Decreased by:	
On-Behalf TPAF Pension & Social Security	2,750,116
Adjusted 2022-2023 General Fund Expenditures	\$ 15,082,560
2% of Adjusted 2022-2023 General Fund Expenditures	\$ 301,651
Enter Greater of 2% of Adjusted 2022-2023 General Fund Expenditures or \$250,000	\$ 301,651
Increased by: Allowable Adjustments-Extraordinary Aid	91,521
Maximum Unassigned Fund Balance	\$ 393,172

SECTION 2 - All Districts

Total General Fund - Fund Balance at June 30, 2023 (Per ACFR Budgetary Comparison Schedule/Statement)	\$ 5,097,409
Decreased by:	
Year End Encumbrances	\$ 119,106
Restricted Fund Balance - Excess Surplus-Designated for Subsequent Year's Expenditures	1,655,363
Restricted Fund Balance - Capital Reserve	461,343
Restricted Fund Balance - Maintenance Reserve	488,745
Restricted Fund Balance - Emergency Reserve	250,000
Restricted for Unemployment Compensation	15,239
Assigned Fund Balance - Designated for Subsequent Year's Expenditures	518,409
	3,508,205
Total Unassigned Fund Balance	\$ 1,589,204

SECTION 3 - All Districts

Restricted Fund Balance - Excess Surplus	\$ 1,196,032
Recapitulation of Excess Surplus as of June 30, 2023	
Excess Surplus-Designated for Subsequent Year's Expenditures	\$ 1,655,363
Excess Surplus	1,196,032
Total Excess Surplus	\$ 2,851,395

CARLSTADT BOARD OF EDUCATION
ADMINISTRATIVE FINDINGS – FINANCIAL, COMPLIANCE AND PERFORMANCE REPORTING
FOR THE FISCAL YEAR ENDED JUNE 30, 2023

RECOMMENDATIONS

I. **Administration Practices and Procedures**

There are none.

II. **Financial Planning, Accounting and Reporting**

It is recommended that:

1. All salaries covered by the ESSER Grant be approved by resolution.

III. **School Purchasing Program**

There are none.

IV. **School Food Service**

There are none.

V. **Student Body Activities**

There are none.

VI. **Application for State School Aid (ASSA)**

There are none.

VII. **Pupil Transportation**

There are none.

VIII. **Facilities and Capital Assets**

There are none.

IX. **Status of Prior Years' Audit Findings/Recommendations**

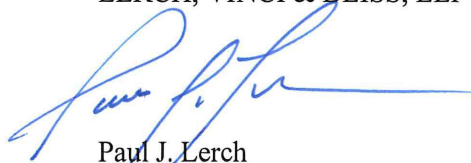
A review was performed on all prior years' recommendations and corrective action was taken on all.

ACKNOWLEDGEMENT

We received the complete cooperation of all the officials of the school district and we greatly appreciate the courtesies extended to us.

Respectfully submitted,

LERCH, VINCI & BLISS, LLP

A handwritten signature in blue ink, appearing to read "Paul J. Lerch", with a long horizontal flourish extending to the right.

Paul J. Lerch
Certified Public Accountant
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