

FINANCIAL REPORT
Audited
TOWN OF WALLKILL INDUSTRIAL DEVELOPMENT AGENCY
(A Component Unit of the Town of Wallkill, New York)
MIDDLETOWN, NEW YORK
December 31, 2022

Audited for:

Board of Directors
Town of Wallkill Industrial Development Agency

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Audited By:
RBT CPAs, LLP
11 Racquet Road
Newburgh, NY 12550
(845) 567-9000

TOWN OF WALLKILL INDUSTRIAL DEVELOPMENT AGENCY

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INDEPENDENT AUDITOR'S REPORT

Board of Directors
Town of Wallkill Industrial Development Agency
99 Tower Drive, Building A
Middletown, NY 10941

Report on the Financial Statements

Opinion

We have audited the accompanying financial statements of the Town of Wallkill Industrial Development Agency (the "Agency"), a component unit of the Town of Wallkill, New York, as of and for the years ended December 31, 2022 and 2021, and the related notes to the financial statements, which collectively comprise the Agency's basic financial statements as listed in the table of contents.

In our opinion, the accompanying financial statements referred to above present fairly, in all material respects, the financial position of the Agency as of December 31, 2022 and 2021, and the changes in financial position and its cash flows for the years then ended in accordance with accounting principles generally accepted in the United States of America.

Basis for Opinion

We conducted our audit in accordance with auditing standards generally accepted in the United States of America ("GAAS") and the standards applicable to financial audits contained in *Government Auditing Standards* ("GAS"), issued by the Comptroller General of the United States. Our responsibilities under those standards are further described in the Auditor's Responsibilities for the Audit of the Financial Statements section of our report. We are required to be independent of the Agency, and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements relating to our audit. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion.

Responsibilities of Management for the Financial Statements

Management is responsible for the preparation and fair presentation of the financial statements in accordance with accounting principles generally accepted in the United States of America, and for the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, management is required to evaluate whether there are conditions or events, considered in the aggregate, that raise substantial doubt about the Agency's ability to continue as a going concern for

twelve months beyond the financial statement date, including any currently known information that may raise substantial doubt shortly thereafter.

Auditor's Responsibilities for the Audit of the Financial Statements

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance but is not absolute assurance and therefore is not a guarantee that an audit conducted in accordance with GAAS and *Government Auditing Standards* will always detect a material misstatement when it exists. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control. Misstatements are considered material if there is a substantial likelihood that, individually or in the aggregate, they would influence the judgment made by a reasonable user based on the financial statements.

In performing an audit in accordance with GAAS and *Government Auditing Standards*, we

- exercise professional judgment and maintain professional skepticism throughout the audit.
- identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error, and design and perform audit procedures responsive to those risks. Such procedures include examining, on a test basis, evidence regarding the amounts and disclosures in the financial statements.
- obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Agency's internal control. Accordingly, no such opinion is expressed.
- evaluate the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluate the overall presentation of the financial statements.
- conclude whether, in our judgment, there are conditions or events, considered in the aggregate, that raise substantial doubt about the Agency's ability to continue as a going concern for a reasonable period of time.

We are required to communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit, significant audit findings, and certain internal control-related matters that we identified during the audit.

Required Supplementary Information

Accounting principles generally accepted in the United States of America require that the Management's Discussion and Analysis, on pages 4-5 be presented to supplement the basic financial statements. Such information is the responsibility of management and, although not a part of the basic financial statements, is required by the Governmental Accounting Standards Board who considers it to be an essential part of financial reporting for placing the basic financial statements in an appropriate operational, economic, or historical context. We have applied certain limited procedures to the required supplementary information in accordance with auditing standards generally accepted in the United States of America, which consisted of inquiries of management about the methods of preparing the information and comparing the information for consistency with management's responses to our inquiries, the basic financial statements, and other knowledge we obtained during our audit of the basic financial statements. We do not express an opinion or provide any assurance on the information because the limited procedures do not provide us with sufficient evidence to express an opinion or provide any assurance.

Other Information

Management is responsible for the other information included on page 12. The other information comprises the Schedule of Other Information. Our opinions on the basic financial statements do not cover the other information, and we do not express an opinion or any form of assurance thereon.

In connection with our audit of the basic financial statements, our responsibility is to read the other information and consider whether a material inconsistency exists between the other information and the basic financial statements, or the other information otherwise appears to be materially misstated. If, based on the work performed, we conclude that an uncorrected material misstatement of the other information exists, we are required to describe it in our report.

Other Reporting Requirements Required by *Government Auditing Standards*

In accordance with *Government Auditing Standards*, we have also issued our report dated March 24, 2023, on our consideration of the Agency’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 purpose of that report is solely to describe the scope of our testing of internal control over financial reporting and compliance and the results of that testing, and not to provide an opinion on internal control over financial reporting or on compliance. That report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering the Agency’s internal control over financial reporting and compliance.

RBT CPAs, LLP

Newburgh, NY
March 24, 2023

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**TOWN OF WALLKILL INDUSTRIAL DEVELOPMENT AGENCY
 REQUIRED SUPPLEMENTARY INFORMATION
 MANAGEMENT’S DISCUSSION AND ANALYSIS**

The following Management’s Discussion and Analysis (“MD&A”) report provides the reader with an introduction and overview to the financial activities and performance of the Town of Wallkill Industrial Development Agency (the “Agency”) for the years ended December 31, 2022 and 2021, as mandated by GASB 34. This information should be reviewed in conjunction with the Agency’s audited financial statements.

The Agency was established to encourage economic growth within the Town of Wallkill, New York.

FINANCIAL POSITION SUMMARY

Net position may serve as an indicator of the Agency’s financial position. The Agency’s net position was \$410,404 and \$424,267 at December 31, 2022 and 2021, respectively. The decrease in net position of \$(13,863) reflects the Agency’s loss for 2022.

For details of the Agency’s finances, see the accompanying financial statements and notes thereof.

SUMMARY OF NET POSITION

<u>ASSETS</u>	<u>2022</u>	<u>2021</u>	<u>\$ Change</u>	<u>% Change</u>
Current Assets	<u>\$ 462,377</u>	<u>\$ 476,395</u>	<u>\$ (14,018)</u>	<u>-2.94%</u>
Total Assets	<u>462,377</u>	<u>476,395</u>	<u>(14,018)</u>	<u>-2.94%</u>
<u>LIABILITIES</u>				
Current Liabilities	<u>51,973</u>	<u>52,128</u>	<u>(155)</u>	<u>-0.30%</u>
Total Liabilities	<u>51,973</u>	<u>52,128</u>	<u>(155)</u>	<u>-0.30%</u>
<u>NET POSITION</u>				
Unrestricted	<u>410,404</u>	<u>424,267</u>	<u>(13,863)</u>	<u>-3.27%</u>
Total Net Position	<u>\$ 410,404</u>	<u>\$ 424,267</u>	<u>\$ (13,863)</u>	<u>-3.27%</u>

**TOWN OF WALLKILL INDUSTRIAL DEVELOPMENT AGENCY
 REQUIRED SUPPLEMENTARY INFORMATION
 MANAGEMENT'S DISCUSSION AND ANALYSIS**

FINANCIAL OPERATIONS HIGHLIGHTS

There was a decrease in net position of \$13,863 in 2022.

Project fees were \$0 for 2022 and 2021.

A summary of operations is as follows:

SUMMARY OF REVENUES, EXPENSES, AND CHANGES IN NET POSITION

<u>REVENUES</u>	<u>2022</u>	<u>2021</u>	<u>\$ Change</u>	<u>% Change</u>
Project Fees	\$ -	\$ -	\$ -	0.00%
Interest Income	87	48	39	81.25%
Other Income	-	25	(25)	100.00%
Total Revenues	87	73	14	19.18%
<u>EXPENSES</u>				
Professional Fees	13,950	18,606	(4,656)	-25.02%
Total Expenses	13,950	18,606	(4,656)	-25.02%
Change in Net Position	\$ (13,863)	\$ (18,533)	\$ 4,670	-25.20%

FINANCIAL STATEMENTS

The Agency's financial statements are prepared in accordance with generally accepted accounting principles, as promulgated by the Governmental Accounting Standards Board. The Agency is structured as an enterprise fund.

**TOWN OF WALLKILL INDUSTRIAL DEVELOPMENT AGENCY
MIDDLETOWN, NEW YORK
STATEMENTS OF NET POSITION**

As of December 31	2022	2021
ASSETS		
Current Assets:		
Cash and Cash Equivalents	\$ 462,377	\$ 476,395
Total Current Assets	462,377	476,395
TOTAL ASSETS	462,377	476,395
LIABILITIES		
Current Liabilities:		
Accounts and Returnable Fees Payable	19,473	19,628
Escrow Liability	32,500	32,500
Total Current Liabilities	51,973	52,128
NET POSITION		
Unrestricted	410,404	424,267
TOTAL NET POSITION	\$ 410,404	\$ 424,267

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**TOWN OF WALLKILL INDUSTRIAL DEVELOPMENT AGENCY
MIDDLETOWN, NEW YORK
STATEMENTS OF REVENUES, EXPENSES AND CHANGES IN NET POSITION**

For the Years Ended December 31	2022	2021
Operating Revenues:		
Project Fees	\$ -	\$ -
Total Operating Revenues	<u>-</u>	<u>-</u>
Operating Expenses:		
Dues and Publication	-	70
Contracted Services	2,500	2,500
Professional Fees	11,450	16,036
Total Operating Expenses	<u>13,950</u>	<u>18,606</u>
Operating Income	<u>(13,950)</u>	<u>(18,606)</u>
Non-Operating Revenues:		
Interest Income	87	48
Other Income	-	25
Net Non-Operating Revenues	<u>87</u>	<u>73</u>
Change in Net Position	(13,863)	(18,533)
Net Position, Beginning	<u>424,267</u>	<u>442,800</u>
Net Position, Ending	<u>\$ 410,404</u>	<u>\$ 424,267</u>

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**TOWN OF WALLKILL INDUSTRIAL DEVELOPMENT AGENCY
MIDDLETOWN, NEW YORK
STATEMENTS OF CASH FLOWS**

For the Years Ended December 31	2022	2021
Cash Flows from Operating Activities:		
Receipts from Providing Services	\$ -	\$ -
Payments for Professional Services	<u>(14,105)</u>	<u>(16,514)</u>
Net Cash Provided by/(Used in) Operating Activities	<u>(14,105)</u>	<u>(16,514)</u>
Cash Flows from Non-Operating Activities		
Refund of Prior Year Expenditures	<u>0</u>	<u>25</u>
Net Cash Provided by Non-Operating Activities	<u>0</u>	<u>25</u>
Cash Flows from Investing Activities		
Interest Income	<u>87</u>	<u>48</u>
Net Cash Provided by Investing Activities	<u>87</u>	<u>48</u>
Net Increase/(Decrease) in Cash and Cash Equivalents	(14,018)	(16,466)
Cash and Cash Equivalents, Beginning	<u>476,395</u>	<u>492,836</u>
Cash and Cash Equivalents, Ending	<u>\$ 462,377</u>	<u>\$ 476,370</u>
Reconciliation of Operating Income to Net Cash Provided by/(Used in) Operating Activities		
Operating (Loss)	\$ (13,950)	\$ (18,606)
Adjustments to Reconcile Operating Income to Net Cash Provided by/(Used in) Operating Activities:		
Changes in Assets and Liabilities:		
Accounts Payable	<u>(155)</u>	<u>2,092</u>
Net Cash Provided by/(Used in) Operating Activities	<u>\$ (14,105)</u>	<u>\$ (16,514)</u>

**TOWN OF WALLKILL INDUSTRIAL DEVELOPMENT AGENCY
MIDDLETOWN, NEW YORK
NOTES TO THE FINANCIAL STATEMENTS**

I. ORGANIZATION AND SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

A. Organization and Purpose

The Town of Wallkill Industrial Development Agency (the “Agency”) is a public benefit corporation established under Section 856 of the New York State Industrial Development Agency Act of the State of New York and Chapter 73 of the Laws of 1970 of the State. The Agency was established to encourage economic growth within the Town of Wallkill, New York. Its operations are financed primarily by the Town of Wallkill by providing use of Town staff and facilities.

B. The Reporting Entity

The Agency is considered a component unit of the financial reporting entity known as the Town of Wallkill, New York. Inclusion in the financial reporting entity, the Town of Wallkill, is determined based on financial accountability as defined by Governmental Accounting Standards Board (“GASB”) Statement No. 14, “The Financial Reporting Entity” as amended. The Town of Wallkill Town Board appoints all the Agency’s Board Members. This level of control meets the criteria for financial accountability as defined by GASB Statement No. 14, as amended.

C. Basis of Accounting

The financial statements of the Agency have been prepared in conformity with generally accepted accounting principles (“GAAP”), as applied to government units. GASB is the accepted standard-setting body for establishing governmental accounting and financial reporting principles. Under standards set by the GASB, the Agency is considered an proprietary fund. Proprietary fund financial statements are prepared on the accrual basis of accounting, which records the financial effects on an enterprise of transactions and other events when these transactions and events occur. Revenues are recognized when they are earned and expenses are recognized when they are incurred. The measurement focus is the flow of current financial resources.

D. Cash and Cash Equivalents

For presenting the statements of cash flows, the Agency considers all demand deposits, time and savings accounts, and certificates of deposit with an original maturity of three months or less, to be cash or cash equivalents.

Agency monies are deposited in FDIC insured commercial banks or trust companies located within the State of New York. The Agency is authorized to use demand deposit, time and money market savings accounts, and certificates of deposit. Governmental Accounting Standards Board Statement No. 40 *Deposits and Investment Risk Disclosure*, directs that deposits be disclosed as exposed to custodial credit risk if they are not covered by depository insurance, or collateralized by securities held by the Agency or its agent in the Agency’s name. The Agency’s cash balances were fully insured by the FDIC.

E. Risk Management

Risk management activities are limited to being listed as an additional insured on properties covered by payment in lieu of tax (“PILOT”) agreements. The Agency’s management believes it has limited exposure for loss as it has no employees. Tax assessment disputes are litigated by the taxing authorities with no financial effect on the Agency.

**TOWN OF WALLKILL INDUSTRIAL DEVELOPMENT AGENCY
MIDDLETOWN, NEW YORK
NOTES TO THE FINANCIAL STATEMENTS**

I. ORGANIZATION AND SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (CONTINUED)

F. Use of Estimates

The preparation of basic financial statements, in conformity with accounting principles generally accepted in the United States of America, requires management to make estimates and assumptions that affect the amounts of assets and liabilities and disclosure of contingent assets and liabilities at the date of the financial statements and the reported amounts of revenues and expenses during the reporting period. Accordingly, actual results could differ from those estimates.

G. Subsequent Events

The Agency evaluated subsequent events for disclosure and/or recognition in the financial statements from December 31, 2022, and through March 24, 2023, the date on which the financial statements were available for issuance.

II. CONDUIT DEBT - INDUSTRIAL REVENUE BONDS

Certain revenue bonds and notes authorized by the Agency and issued through various lending institutions are considered conduit debt - special obligations of the Agency. They are secured by property, which is leased to private companies and educational institutions and are usually retired by the related lease payments. The bonds and notes are not guaranteed by the Agency, nor by the Town of Wallkill. Recourse by the lending institutions and ultimate bond holders is limited to the collateralized properties and related lease revenues. Therefore, the Agency does not record the assets and liabilities resulting from completed bond and note issues in its financial statements since its primary function is to arrange the financing between the borrowers and the bond and note holders. Funds arising therefrom are normally controlled by trustees or banks acting as fiscal agents. There are no such bonds outstanding as of December 31, 2022.

III. ESCROW LIABILITIES

All Town of Wallkill IDA projects are required to comply with the IDA's Labor Policy, providing for the use of local labor particularly during the construction phase. The IDA monitors compliance, including using a third-party monitor. The Agency collects escrow amounts to pay for the labor policy compliance monitoring. The Agency has also collected escrow amounts to recapture potential unauthorized sales tax abatements. In each case any unused funds will be returned to the project developers upon project completion. Below are the amounts held in escrow as of December 31, 2022 and December 31, 2021:

2022	Labor Monitoring	Sales Tax Abatement	Total
Banta	\$ 7,500	\$ 5,000	\$ 12,500
Dunning	7,500	-	7,500
President Container	7,500	5,000	12,500
TOTAL	\$ 22,500	\$ 10,000	\$ 32,500

2021	Labor Monitoring	Sales Tax Abatement	Total
Banta	\$ 7,500	\$ 5,000	\$ 12,500
Dunning	7,500	-	7,500
President Container	7,500	5,000	12,500
TOTAL	\$ 22,500	\$ 10,000	\$ 32,500

**TOWN OF WALLKILL INDUSTRIAL DEVELOPMENT AGENCY
MIDDLETOWN, NEW YORK
NOTES TO THE FINANCIAL STATEMENTS**

IV. CONTINGENCIES

The Agency is in the process of re-evaluating certain contracts regarding the allocation of PILOT revenue between different taxing authorities. The effect of any revised allocations, if determined, is not known.

V. NEW REPORTING STANDARDS

The GASB has issued Statements 94 through 101, with varying implementation dates, , none of which are expected to have any substantive effects on the Agency's net position.

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OTHER INFORMATION

**TOWN OF WALLKILL INDUSTRIAL DEVELOPMENT AGENCY
MIDDLETOWN, NEW YORK
SCHEDULE OF OTHER INFORMATION**

	3308-2 Wallkill Living Center, LP	3308-5 Dunning Hospitality, LLC	3308-6 Banta Hospitality, LLC	3308-7 President Container Group II, LLC
Tax Exemptions:				
Sales Tax	\$ -	\$ -	\$ -	\$ -
Real Property Tax*	255,283	-	-	-
Mortgage Recording	-	-	-	-
TOTAL	\$ 255,283	\$ -	\$ -	\$ -
Payments in Lieu of Taxes:				
County	\$ 12,264	\$ -	\$ -	\$ -
Local	13,374	-	-	-
School	101,162	-	-	-
TOTAL	\$ 126,800	\$ -	\$ -	\$ -
# FTEs before IDA status	0	0	0	300
Original Estimate of Jobs to be Created	0	20	20	50
Original Estimate of Jobs to be Retained	0	20	0	350
Current # of FTEs - Unaudited	4	14	20	358
# of FTE Construction Jobs During Fiscal Year	0	0	0	64
Net Employment Change	4	14	20	58

* Real Property Tax Exemptions indicate the total amount for which a project would have been liable if the project occurred but the IDA was not involved.

OTHER REPORTING REQUIRED by
GOVERNMENT AUDITING STANDARDS

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**INDEPENDENT AUDITOR’S REPORT ON INTERNAL CONTROL
OVER FINANCIAL REPORTING AND ON COMPLIANCE
AND OTHER MATTERS BASED ON AN AUDIT OF
FINANCIAL STATEMENTS PERFORMED IN ACCORDANCE WITH
GOVERNMENT AUDITING STANDARDS**

Board of Directors
Town of Wallkill Industrial Development Agency
99 Tower Drive, Building A
Middletown, NY 10941

We have audited, 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, the financial statements of the Town of Wallkill Industrial Development Agency (the “Agency”), a component unit of the Town of Wallkill, New York, as of and for the year ended December 31, 2022, and the related notes to the financial statements, which collectively comprise the Agency’s basic financial statements, and have issued our report thereon dated March 24, 2023.

Report on Internal Control Over Financial Reporting

In planning and performing our audit of the financial statements, we considered the Town of Wallkill Industrial Development Agency’s internal control over financial reporting (internal control) to determine the audit procedures that are appropriate in the circumstances for the purpose of expressing our opinion on the financial statements but not for the purpose of expressing an opinion on the effectiveness of the Town of Wallkill Industrial Development Agency’s internal control. Accordingly, we do not express an opinion on the effectiveness of the Agency’s internal control.

A deficiency in internal control exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct misstatements on a timely basis. *A material weakness* is a deficiency, or combination of deficiencies, in internal control, such that there is a reasonable possibility that a material misstatement of the entity’s financial statements will not be prevented, or detected and corrected, on a timely basis. *A significant deficiency* is a deficiency, or a combination of deficiencies, in internal control that is less severe than a material weakness, yet important enough to merit attention by those charged with governance.

Our consideration of internal control was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control that might be material weaknesses or significant deficiencies and therefore, material weaknesses or significant deficiencies may exist that have not been identified. Given these limitations, during our audit we did not identify any deficiencies in internal control that we consider to be material weaknesses. We identified a deficiency in internal control, described in the accompanying schedule of findings as item 2022-001, that we consider to be a significant deficiency in internal control.

Report on Compliance and Other Matters

As part of obtaining reasonable assurance about whether the Town of Wallkill Industrial Development Agency's financial statements are free of material misstatement, we performed tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements, noncompliance with which could have a direct and material effect on the determination of financial statement amounts. However, providing an opinion on compliance with those provisions was not an objective of our audit and, accordingly, we do not express such an opinion. The results of our tests disclosed instances of noncompliance, or other matters that are required to be reported under *Government Auditing Standards*, and which are described in the accompanying schedule of findings and questioned costs as items 2022-002 and 2022-003.

Purpose of this Report

The purpose of this report is solely to describe the scope of our testing of internal control and compliance and the results of that testing, and not to provide an opinion on the effectiveness of the Town of Wallkill Industrial Development Agency's internal control or on compliance. This report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering the Town of Wallkill Industrial Development Agency's internal control and compliance. Accordingly, this communication is not suitable for any other purpose.

RBT CPAs, LLP

Newburgh, New York
March 24, 2023

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**TOWN OF WALLKILL INDUSTRIAL DEVELOPMENT AGENCY
SCHEDULE OF FINDINGS
FOR THE YEAR ENDED DECEMBER 31, 2022**

A. Internal Control Finding

2022-001 PILOT Activity

Condition: The Agency's did not deposit nor disburse the PILOT payments it collected into or from the IDA's bank account but used a Town of Wallkill bank account. Further there was no documentation of the authorization of the disbursements by the IDA Board.

Criteria: All of the Agency's deposits and disbursements should be made from its own bank account.

Cause: The Agency did not run the PILOT payments through the IDA bank account.

Effect: The IDA had no control over the PILOT activity.

Recommendation: RBT recommends that the Agency collect and distribute PILOTS through the IDA bank account and general ledger. Furthermore, the Board should authorize all disbursements and review financial activity at its meeting.

B. Compliance Findings

2022-002 Annual Report

Condition: The Agency's 2021 Annual Report was not submitted to the ABO timely.

Criteria: The Agency was required to submit the Annual Report to the ABO before the due date of March 31, 2022.

Cause: The Agency submitted the Annual Report on April 20, 2022, after the due date of March 31, 2022.

Effect: The Annual report was late.

Recommendation: RBT recommends that the Agency submit the annual report to the ABO on time going forward.

2022-003 1099's Preparation and Filing

Condition: The Agency's did not properly issue 1099s during the year ended December 31, 2022.

Criteria: The Agency is required to file 1099s in accordance with IRS rules and regulations.

Cause: The Agency did not review its disbursements for compliance.

Effect: The Agency is not in compliance with IRS rules and regulations.

Recommendation: RBT recommends that the Agency issue 1099s for all required entities annually.