CUMBERLAND-SALEM SOIL CONSERVATION DISTRICT

Deerfield, New Jersey

REPORT OF AUDIT FOR THE YEAR ENDED JUNE 30, 2024

TABLE OF CONTENTS

	Page
Roster of Officials	1
Independent Auditor's Report	2 - 5
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	6
Basic Financial Statements	
Exhibits	
A Statement of Financial Position	7 - 8
B Statements of Activities and Changes in Net Assets	9 - 10
C Statement of Cash Flows – All Funds Combined	11
Notes to Financial Statements	12 – 25
Required Supplemental Information	
Exhibits	
D Statement of Budget Versus Actual Revenues & Expenditures – All Funds Combined	26
Comments and Recommendations	27 - 28

CUMBERLAND-SALEM SOIL CONSERVATION DISTRICT

ROSTER OF OFFICALS

FOR THE YEAR ENDED JUNE 30, 2024

DISTRICT BOARD OF SUPERVISORS

Name	Title	<u>Term Expires</u>
Ronald Thomas	Chairman	June 30, 2026
Ralph Sickler	Vice Chairman	June 30, 2027
Maurice Sheets	Supervisor	June 30, 2027
Henry Dubois	Supervisor	June 30, 2026
Tom Tedesco	Supervisor	June 30, 2025

ADMINISTRATIVE OFFICIALS

Michael J. Bonham District Manager

NIGHTLINGER, COLAVITA & VOLPA

A Professional Association Certified Public Accountants

991 S. Black Horse Pike P.O. Box 799 Williamstown, NJ 08094 (856) 629-3111 Fax (856) 728-2245 www.colavita.net

INDEPENDENT AUDITOR'S REPORT

Board of Supervisors Cumberland Salem Soil Conservation District 1516 Route 77, P.O. Box 68 Deerfield, New Jersey 08313

To the Board of Supervisors:

Opinion

We have audited the accompanying financial statements of the Cumberland Salem Soil Conservation District as of June 30, 2024 and 2023, which comprise the statement of financial position and the related statements of activities and changes in net assets and of cash flows for the year then ended, and the related notes to the financial statements, which collectively comprise the Cumberland Salem Soil Conservation District's basic financial statements as listed in the table of contents.

Opinion on Statutory Basis of Accounting

In our opinion, the financial statements referred to above present fairly, in all material respects, the financial position of the Cumberland Salem Soil Conservation District, as of June 30, 2024 and 2023, and the changes in net assets and its cash flows for the year then ended in conformity with accounting principles and practices prescribed by the New Jersey Department of Agriculture's Financial Accounting Manual, as described in note 1.

Adverse Opinion on U.S. Generally Accepted Accounting Principles

In our opinion, because of the significance of the matter discussed in the "Basis for Adverse Opinion on U.S. Generally Accepted Accounting Principles" paragraph, the financial statements referred to above do not present fairly, in accordance with accounting principles generally accepted in the United States of America, the financial position of the Cumberland Salem Soil Conservation District, as of June 30, 2024 and 2023, or the results of its operations and changes in net assets for the year then ended.

Basis for Adverse Opinion on U.S. Generally Accepted Accounting Principles

As described in Note 1 of the financial statements, the financial statements are prepared by the District on the basis of the financial reporting provisions of the New Jersey Department of Agriculture's Financial Accounting Manual, which is a basis of accounting other than accounting principles generally accepted in the United States of America, as required by the New Jersey State Soil Conservation Committee.

The effects on the financial statements of the variances between the statutory basis of accounting described in Note 1 and accounting principles generally accepted in the United States of America, although not reasonably determinable, are presumed to be material.

Management's Responsibility for the Financial Statements

Management is responsible for the preparation and fair presentation of these financial statements in accordance with the financial reporting provisions of the New Jersey Department of Agriculture's Financial Accounting Manual. Management is also responsible 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.

Management is required to evaluate whether there are conditions or events, considered in the aggregate, that raise substantial doubt about the District'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 Responsibility 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 opinions. 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 auditing standards generally accepted in the United States of America 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 auditing standards generally accepted in the United States of America 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 District'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 District'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.

Other Matters

Required Supplementary Information

Our audit was conducted for the purpose of forming opinions on the financial statements that collectively comprise the Cumberland Salem Soil Conservation District's financial statements as a whole. The accompanying supplementary information listed in the foregoing table of contents, is presented for the are presented for the purposes of additional analysis as required by the New Jersey Department of Agriculture's Financial Accounting Manual in accordance with those standards regarding the statement of budget versus actual revenue and expenditures - all funds combined and is not a required part of the financial statements. The information has been subjected to the auditing procedures applied in the audit of the financial statements and certain additional procedures, including comparing and reconciling such information directly to the underlying accounting and other records used to prepare the basic financial statements or to the basic financial statements themselves, and other additional procedures in accordance with auditing standards generally accepted in the United States of America and the audit requirements as prescribed by the New Jersey Department of Agriculture's Financial Accounting Manual. In our opinion, the statement of budget versus actual revenue and expenditures is fairly stated, in all material respects, in relation to the financial statements taken as a whole.

Other Information

Our audit was conducted for the purpose of forming an opinion on the financial statements as a whole that collectively comprise the Cumberland Salem Soil Conservation District's basic financial statements. The supplementary schedules, as listed in the table of contents, are presented for purposes of additional analysis and are not required as part of the basic financial statements prescribed by the New Jersey Department of Agriculture's Financial Accounting Manual. Such information is the responsibility of management and was derived from and relates directly to the underlying accounting and other records used to prepare the financial statements and certain additional procedures, including comparing and reconciling such information directly to the underlying accounting statements or to the financial statements themselves, and other additional procedures in accordance with auditing standards generally accepted in the United States of America and the audit requirements as prescribed by the New Jersey Department of Agriculture's Financial statements as prescribed by the New Jersey Department of Agriculture's Financial statements as prescribed by the New Jersey Department of Agriculture's Financial statements as prescribed by the New Jersey Department of Agriculture's Financial Accounting Manual. In our opinion, supplementary schedules, as listed in the table of contents, are fairly stated, in all material respects, in relation to the basic financial statements as a whole.

Other Reporting Required by Government Auditing Standards

In accordance with <u>Government Auditing Standards</u>, we have also issued a report dated December 16, 2024, on our consideration of the Cumberland Salem Soil Conservation District's internal control over financial reporting and our test of its compliance with certain provisions of laws, regulations, contracts and grant agreements and other matters. The purpose of that report is 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 the internal control over financial reporting or on compliance. That report is an integral part of an audit performed in accordance with Government Auditing Standards and should be read in conjunction with this report in considering the results of our audit.

Respectfully submitted,

NIGHTLINGER, COLAVITA & VOLPA, P.A.

Raymond Colavita, C.P.A. Registered Municipal Accountant December 16, 2024

NIGHTLINGER, COLAVITA & VOLPA

A Professional Association Certified Public Accountants

991 S. Black Horse Pike P.O. Box 799 Williamstown, NJ 08094 (856) 629-3111 Fax (856) 728-2245 www.colavita.net

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 Supervisors Cumberland Salem Soil Conservation District 1516 Route 77 P.O. Box 68 Deerfield, New Jersey 08313

To the Board of Supervisors:

We have audited the financial statements of the Cumberland Salem Soil Conservation District as of and for the year ended June 30, 2024 and 2023, and the related notes to the financial statements, which collectively comprise the Cumberland Salem Soil Conservation District's basic financial statements and have issued our report thereon dated December 16, 2024. We conducted our audit 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; audit requirements as prescribed by the New Jersey Department of Agriculture's Financial Accounting Manual.

Report on Internal Control Over Financial Reporting

In planning and performing our audit of the financial statements, we considered the District's internal control over financial reporting as a basis for designing audit procedures that are appropriate in the circumstances for the purpose of expressing our opinions on the financial statements but not for the purpose of expressing an opinion on the effectiveness of the District's internal control over financial reporting. Accordingly, we do not express an opinion on the effectiveness of the District's internal control over financial reporting.

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 over financial reporting was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control over financial reporting that might be significant deficiencies or material weaknesses. Given these limitations, during our audit we did not identify any deficiencies in internal control that we consider to be material weaknesses. However, significant deficiencies or material weaknesses may exist that have not been identified.

Report on Compliance and Other Matters

As part of obtaining reasonable assurance about whether the District'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 financial statements. However, providing an opinion on compliance with such provisions was not an objective of our audit and, accordingly, we do not express such an opinion. The results of our tests disclosed no instances of noncompliance or other matters that are required to be reported under **Government Auditing Standards**.

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 entity'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 entity's internal control and compliance. Accordingly, this communication is not suitable for any other purpose.

This report is intended for the information of the Cumberland Salem Soil Conservation District, the funding sources of the Cumberland Salem Soil Conservation District, the New Jersey Department of Agriculture, and Federal and State audit agencies and is not intended to be and should not be used by anyone other than those specified parties. However, this report is a matter of public record, and its distribution is not limited.

Respectfully submitted,

NIGHTLINGER, COLAVITA & VOLPA, P.A.

L (

Raymond Colavita, C.P.A. Registered Municipal Accountant December 16, 2024

CUMBERLAND-SALEM SOIL CONSERVATION DISTRICT STATEMENT OF FINANCIAL POSITION FOR THE YEAR ENDED JUNE 30, 2024 (With Summarized Information as of June 30, 2023)

	Unrestricted Funds	i.	Temporarily Restricted Equipment Building Chapter 251 Fund Fund						Totals for the Year Ended June 30 2024 2023		
ASSETS				-				1 10			
Current Assets: Cash Operating Funds	\$ 409,215	\$	186,596	\$		\$		\$	595,811 \$	5	790,104
Savings and Investments Accounts Receivable			715,894				73,511		789,405		454,526
Stormwater Fees Receivable Cumberland County	3,640 15,000								3,640 15,000		3,290 30,000
Prepaid Insurance (Note 13)			1,181	- 0		-		-	1,181		1,185
Total Current Assets	427,855		903,671	- -		-	73,511		1,405,037		1,279,105
Fixed Assets Office Furniture and Equipment Land Building Improvements and Renovations					94,139		52,290 60,281 64,874		94,139 52,290 60,281 64,874		94,139 52,290 60,281 64,874
Total Fixed Assets				-	94,139	-	177,445		271,584		271,584
Less: Accumulated Depreciation					92,939		118,975	2	211,914		211,059
Total Fixed Assets - Net of Depreciation					1,200	_	58,470	-	59,670		60,525
Total Assets	\$ 427,855	\$ =	903,671	\$	1,200	\$ =	131,981	\$ =	1,464,707 \$		1,339,630

The accompanying Notes to Financial Statements are an integral part of this statement.

EXHIBIT A (1)

CUMBERLAND-SALEM SOIL CONSERVATION DISTRICT STATEMENT OF FINANCIAL POSITION FOR THE YEAR ENDED JUNE 30, 2024

		~	1.2	Те	mpo	orarily Restricte	ed		_	Totals	Totals for the		
		Unrestricted				Equipment		Building	÷	Year End	ed .	June 30	
	_	Funds		Chapter 251		Fund	_	Fund		2024		2023	
LIABILITIES , NET ASSETS AND RESERVES													
Current Liabilities:													
Accounts Payable	\$		\$	1,397	\$		\$		\$	1,397	\$	524	
Due State of NJ Application Fee				2,350						2,350		1,200	
Due RFA Reimbursement Fee												585	
Accrued Payroll Liabilities				2,817						2,817		4,735	
Total Current Liabilities				6,564						6,564	_	7,044	
NET ASSETS AND RESERVES	_												
Reserve for Future Soil Erosion and													
Sediment Control Act Expenditures													
(See Note 2)				897,107						897,107		744,909	
Reserve for Future Legal Costs (See Note 3)		42,000								42,000		42,000	
Reserve for Compensated Absences													
(See Note 6)		60,913								60,913		59,454	
Net Assets - Per Exhibit B		324,942				1,200		131,981		458,123		486,223	
Total Net Assets and Reserves	_	427,855	-	897,107	1 25	1,200	-	131,981		1,458,143		1,332,586	
	-	,	-				-				-		
Total Liabilities, Net Assets and Reserves	\$	427,855	\$	903,671	\$	1,200	\$ =	131,981	\$	1,464,707	\$ =	1,339,630	

CUMBERLAND-SALEM SOIL CONSERVATION DISTRICT STATEMENT OF ACTIVITIES AND CHANGES IN NET ASSETS FOR THE YEAR ENDED JUNE 30, 2024 (With Summarized Information as of June 30, 2024)

				Те	emp	oorarily Restric	cte	d	-			
			8			F · ·		D		Total		
		Unrestricted Funds		Chapter 251		Equipment Fund		Building Fund	-	Year End 2024	led.	2023
		Fullus		Chapter 251		T UNU	_	Fullu		2024	8.9	2023
Support and Revenue												
Soil Erosion and Sediment												
Control Act Fees	\$		\$	261,924	\$		\$		\$	261,924	\$	268,460
State Stormwater Fees		14,735								14,735		9,450
Cumberland County		15,000								15,000		15,000
Interest on Investments		5,133	- 5				_			5,133		492
Total Support and Revenue		34,868	3 0	261,924					_	296,792		293,402
Expenditures	041											
Salaries and Wages				94,856						94,856		68,331
Health Benefits				9,161						9,161		12,374
Payroll Taxes				7,622						7,622		6,645
Pension Expense				12,468						12,468		15,922
Professional Services				12,604						12,604		7,153
Maintenance/Repairs				6,061						6,061		2,814
Office Supplies and Expenses				8,468						8,468		2,801
Insurance				6,616						6,616		6,381

<u>CUMBERLAND-SALEM SOIL CONSERVATION DISTRICT</u> <u>STATEMENT OF ACTIVITIES AND CHANGES IN NET ASSETS</u> <u>FOR THE YEAR ENDED JUNE 30, 2024</u>

				Т	em	porarily Restr	icte	d			
										Totals fo	r the
	ι	Inrestricted				Equipment		Building	_	Year Ended	June 30
		Funds	- 0 ()	Chapter 251	e e l	Fund	-	Fund	• •	2024	2023
Expenditures (continued)											
Professional/Training	\$		\$	2,950	\$		\$		\$	2,950 \$	2,103
Utilities				7,109						7,109	7,277
Vehicle Expenses				2,466						2,466	3,615
Depreciation						322		532		854	620
Total Expenditures				170,381		322	_	532		171,235	136,036
Excess (Deficiency) of Support and			18 8								
Revenues Over Expenditures		34,868		91,543		(322)		(532)		125,557	157,366
Non-Operating Sources and Uses: (Increase) Decrease in Reserves: Future Soil Erosion and Sediment											
Control Act Expenditures				(152,198)						(152,198)	(137,409)
Compensated Absences		(1,459)		(102,100)						(1,459)	(4,366)
Transfer to Reserves		(60,655)		60,655						(.,)	('''''''''''''''''''''''''''''''''''''
Net Assets, July 1, 2023		352,188		00,000		1,522		132,513		486,223	470,632
Net Assets, June 30, 2024			-11 h		o: : -						
to Exhibit A	\$	324,942	\$		\$ =	1,200	\$	131,981	\$	458,123 \$ =	486,223

EXHIBIT C

CUMBERLAND-SALEM SOIL CONSERVATION DISTRICT STATEMENT OF CASH FLOWS - ALL FUNDS COMBINED FOR THE YEAR ENDED JUNE 30, 2024 AND 2023

	Totals f Year Ende	
	2024	2023
Cash Flow from Operating Activities Excess (deficiency) of Support and Revenues Over Expenditures \$	125,557 \$	157,366
Adjustments to Reconcile Excess (deficiency) of Support and Revenue Over Expenditures to Net Cash Provided by Operating Activities:		
Non-cash Items Included in Income: Depreciation Increase (decrease) in Prior Revenue	854	620
Changes in Assets and Liabilities: (Increase)/Decrease in Accounts Receivable (Increase)/Decrease in Prepaid Insurance (Decrease)/Increase in Accounts Payable (Decrease)/Increase in Due State of NJ Application Fees (Decrease)/Increase in Accrued Payroll	14,650 4 873 565 (1,917)	(16,645) (241) (3,680) 435 842
Cash Provided From Operations	140,586	138,697
Cash Flow from Investing Activities Acquisition of Fixed Assets		(1,610)
Net Increase (Decrease) in Cash	140,586	137,087
Cash and Cash Equivalents - June 30, 2023	1,244,630	1,107,543
Cash and Cash Equivalents - June 30, 2024 \$	1,385,216 \$	1,244,630

1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

Description of Financial Reporting Entity

The Cumberland-Salem Soil Conservation District is one of fifteen Districts in the state of New Jersey under the auspices of the New Jersey Department of Agriculture. Each District is governed by a Board of Supervisors, which sets policies and performance guidelines. The Districts work closely with the U.S. Soil Conservation Service to promote the wise use of soil and water resources. In 1976, the Districts in New Jersey were mandated to administer Chapter 251, The Soil Erosion and Sediment Control Act of 1976, the objective of which was to prevent erosion and sedimentation from development sites, mitigate impacts to soil resources and enhance soil quality.

Financial Statement Presentation

The District is required to report information regarding its financial position and activities according to three classes of assets, which are Unrestricted Net Position, Temporarily Restricted Net Position and Permanently Restricted Net Position. Unrestricted Net Position can be expended by the District for any aspect of its operations and at any time, as determined by management. Temporarily Restricted Net Position are either restricted as to a specific program, a specific time period or both, but will eventually be expended by the District. Permanently Restricted Net Position can never be expended, but benefit the District through investment earnings on such Assets. As of June 30, 2024, the District had only Unrestricted and Temporarily Restricted Net Position.

Basis of Accounting

The accounting policies of the Cumberland-Salem Soil Conservation District conform to practices prescribed by the New Jersey Department of Agriculture's Financial Accounting Manuel.

All of the District's funds are accounted for using the modified accrual basis of accounting. Support and revenues are recognized when they become both measurable and available as net current assets. Expenditures are recognized when the related fund liability is incurred. Chapter 251 revenue is recognized when received and Chapter 251 expenses are recognized when incurred.

The accounts of the District shall be organized on the basis of funds and account groups, each of which is considered a separate accounting entity. The operations of each fund are accounted for with a separate set of self-balancing accounts that comprise its assets, liabilities, Net Position, support, revenues and expenditures. Fixed asset purchases are to be recorded in the fund of acquisition, with an appropriate transfer to the equipment fund. Accumulated depreciation is reported on the statement of financial position.

Amortization of Financing Costs

Financing costs would be amortized using the straight-line method over the term of the loan. The District currently has no loans.

1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (CONTINUED)

Fixed Asset Fund

Capital Assets acquired or constructed for Property Plant and Equipment are recorded at cost. Depreciation is computed using the straight-line method based on the estimated useful lives of the related assets as listed below:

Equipment	5 Years
Building and Improvements	40 Years

The District's fixed assets as of June 30, 2024 and 2023 was as follows:

		6/30/2024	6/30/2023
Buildings	\$	60,281	\$ 60,281
Equipment		94,139	94,139
Improvements/Renovations		64,874	64,874
Land		52,290	52,290
Total at Historical Cost	С-	271,584	271,584
Less Accumulated Depreciation		(211,914)	(211,059)
Fixed Assets, Net	\$	59,670	\$ 60,525

Use of Estimates

The preparation of financial statements in conformity with the New Jersey Department of Agriculture's Financial Accounting Manuel requires management to make estimates and assumptions that affect certain reported amounts of assets, liabilities and disclosures at the date of the financial statements, as well as the reported amounts of revenue and expenditures during the reporting period. Accordingly, actual results could differ from those estimates.

Concentration of Credit Risk

Custodial credit risk is the risk that, in the event of a bank failure, the District's deposits may not be recovered. Although the District does not have a formal policy regarding custodial credit risk, NJSA 17:9-41 t seq. requires that the governmental units shall deposit public funds in public depositories protected from loss under the provisions of the Governmental Unit Deposit Protection Act (GUDPA). GUDPA is a supplemental insurance program set forth by the New Jersey Legislature to protect the deposits of local government agencies. The program is administered by the Commissioner of the NJ Department of Banking and Insurance. Under the Act, the first \$250,000 of governmental deposits in each insured depository is protected by FDIC. Funds owned by the District in excess of FDIC insured amounts are protected by GUDPA. As of June 30, 2024, the District's bank balance of \$1,387,619 was exposed to custodial credit risk as follows:

Insured by FDIC	\$ 830,900
Uninsured and collateralized under GUDPA	
by pledging financial institutions	556,719
	\$ 1,387,619

- 14 -

CUMBERLAND-SALEM SOIL CONSERVATION DISTRICT NOTES TO FINANCIAL STATEMENTS FOR THE YEARS ENDED JUNE 30, 2024 AND 2023

2. **RESERVE FOR FUTURE SOIL EROSION AND SEDIMENT CONTROL EXPENDITURES**

The Reserve for Future Soil Erosion and Sediment Control Act Expenditures is established to identify the funds available for the costs of future expenditures on projects currently received and in progress, for which fees under the act have been previously collected.

All fees collected from applicants are restricted to the Chapter 251 program and used only for implementing that program. The reserve balance includes the unexpended initial review/certification/inspection fees and supplemental fees received. At the option of the District Board and pursuant to formal action by the District Board, interest income from reserve balances may be utilized for the Chapter 251 program or for the District education program. Use of interest income is authorized by N.J.A.C. 2:90-1.12 and pursuant to policy approval by the State Soil Conservation Committee on September 13, 2007. The certification fees collected by the District are derived from an adopted fee schedule that was effective starting November 21, 1994. As a result of rising expenses incurred by the District to maintain their level of services, the Board has revised the fee schedule, effective August 1, 2010 to bring the fees charged in comparability to the expenses incurred.

The Reserve for Future Soil Erosion and Sediment Control Act Expenditures at June 30, 2024 was \$897,107 as compared with \$744,909 in the prior year.

3. **RESERVE FOR FUTURE LEGAL COSTS**

The Reserve for Future Legal Costs provides the District with funds necessary to pay for estimated future legal costs incurred as a result of current Chapter 251 operations. Management estimates that based on prior experience, the reserve balance for future legal costs should be \$42,000.

4. CASH EQUIVALENTS

For purposes of the Statement of Cash Flows, the Cumberland-Salem Soil Conservation District considers highly liquid investments with an initial maturity of three months or less to be cash equivalents.

5. LITIGATION

Per confirmation by the Cumberland-Salem Soil Conservation District's legal counsel, there are no pending litigations, claims, assessments, unasserted claims, or contingent liabilities against the District, which are considered material.

6. RESERVE FOR COMPENSATED ABSENCES

Compensated Absences are those absences for which employees will be paid, such as vacation or sick leave. While the benefit has already been earned, payment is conditioned upon use of the time earned or payment upon retirement, based on the policy in affect at the time of separation. Therefore, a liability has not been set up on the balance sheet, but Net Position has instead been reserved. The balance in the reserve as of June 30, 2024 and June 30, 2023 was \$60,913 and \$59,454, respectively.

7. LEASES

The District had no leases as of June 30, 2024.

8. SURETY BOND COVERAGE

The Cumberland-Salem Soil Conservation District has a public official's liability bond with coverage of \$70,000.

9. **REQUEST FOR AUTHORIZATION**

All storm water discharge associated with construction activity within the state of New Jersey incurs a fee payable to "Treasurer – State of New Jersey ". A portion of the fee is due to the New Jersey department of Environmental Protection, the remaining is split 70% and 30% to the district and State Soil Conservation committee, respectively.

10. UNEARNED REVENUE

Unearned Revenue represents restricted revenue that has been received but not yet earned. As of June 30, 2024, the District had no unearned revenue.

11. PENSION PLANS

Public Employees' Retirement System

Description of Plan - The State of New Jersey, Public Employees' Retirement System (PERS) is a cost-sharing multiple-employer defined benefit pension plan administered by the State of New Jersey, Division of Pensions and Benefits (the Division). For additional information about PERS, please refer to Division's Comprehensive Annual Financial Report (CAFR), which can be found This report may be obtained online at <u>https://www.nj.gov/treasury/pensions/financial-</u>reports.shtml.

Service retirement benefits of 1/55th of final average salary for each year of service credit is available to tiers 1 and 2 members upon reaching age 60 and to tier 3 members upon reaching age 62. Service retirement benefits of 1/60th of final average salary for each year of service

credit is available to tier 4 members upon reaching age 62 and tier 5 members upon reaching age 65.

11. PENSION PLANS (Continued)

Public Employees' Retirement System (Continued)

Early retirement benefits are available to tiers 1 and 2 members before reaching age 60, tiers 3 and 4 with 25 years or more of service credit before age 62, and tier 5 with 30 years or more of service credit before age 65. Benefits are reduced by a fraction of a percent for each month that a member retires prior to the age at which a member can receive full early retirement benefits in accordance with their respective tier. Tier 1 members can receive an unreduced benefit from age 55 to age 60 if they have at least 25 years of service. Deferred retirement is available to members who have at least 10 years of service credit and have not reached the service retirement age for the respective tier.

The vesting and benefit provisions are set by N.J.S.A. 43:15A. PERS provides retirement, death and disability benefits. All benefits vest after ten years of service.

The following represents the membership tiers for PERS:

Tier	Definition
1	Members who are enrolled prior to July 1, 2007.
2	Members who were eligible to enroll on or after July 1, 2007 and prior to November 2, 2008.
3	Members who were eligible to enroll on or after November 2, 2008 and prior to May 22, 2010.
4	Members who were eligible to enroll on or after May 22, 2010 and prior to June 28, 2011.
5	Members who were eligible to enroll on or after June 28, 2011.

Basis of Presentation - The employer and nonemployer allocations and the schedule of pension amounts by employer and nonemployer (collectively, the Schedules) present amounts that are considered elements of the financial statements of PERS, its participating employers or the State as a nonemployer contributing entity. Accordingly, they do not purport to be a complete presentation of the financial position or changes in financial position of PERS or the participating employers. The following disclosures were prepared in accordance with U.S. generally accepted accounting principles. Such preparation requires management of PERS to make a number of estimates and assumptions relating to the reported amounts. Due to the inherent nature of these estimates, actual results could differ from those estimates.

Contributions - The contribution policy is set by N.J.S.A. 43:15A and requires contributions by active members and contributing employers. Plan member and employer contributions may be amended by State of New Jersey legislation. The PERS member total contribution rate as of July 1, 2023 was 7.5% of base salary. The District employee's contributions for the year ended June 30, 2024 were \$6,825. Employers in PERS are required to contribute at an actuarially determined rate which includes funding for cost-of-living adjustments, noncontributory death benefits, and post-retirement medical premiums. The PERS employer rate due in 2023 is 17.11% of covered payroll. The District is billed annually for its normal contribution plus any accrued liability. These contributions were paid by the District and equal to the required

contributions for each year. The District's contributions to PERS for the years ended June 30, 2024, and 2023 were \$12,468 and \$12,138, respectively.

11. PENSION PLANS (Continued)

Public Employees' Retirement System (Continued)

Components of Net Pension Liability - At June 30, 2024, the District's proportionate share of the PERS net pension liability was \$120,316. The net pension liability was measured as of June 30, 2022. The District's proportion of the net pension liability was based on the District's actual contributions to the plan relative to the total of all participating employers' contributions for the year ended June 30, 2023. The District's proportion measured as of June 30, 2024 was 0.000831% which was an decrease of 0.000002% from its proportion measured as of June 30, 2023.

Pension Expense and Deferred Outflows/Inflows of Resources - At June 30, 2024, the District's proportionate share of PERS pension expense, calculated by the plan as of the June 30, 2023 measurement date was (\$4,144). The District's deferred outflows of resources and deferred inflows of resources were from the following sources:

	Deferred Outflows of Resources		Deferred Inflows of Resources
Differences between expected and actual experience	\$ 1,150	\$	492
Changes of assumptions	264		7,292
Net difference between projected and actual earnings on pension plan investments	554		
Changes in proportion			5,796
Contributions subsequent to the measurement date	12,468	a a	
Total	\$ 14,436	\$	13,580

Amounts reported as deferred outflows of resources and deferred inflows of resources related to pensions will be recognized in pension expense as follows:

Year	PERS
2024	\$ (7,475)
2025	(5,298)
2026	2,011
2027	(856)
2028	6
Thereafter	
Total	\$ (11,612)

11. PENSION PLANS (Continued)

Public Employees' Retirement System (Continued)

Actuarial Assumptions - The total pension liability for the June 30, 2024 measurement date was determined by an actuarial valuation as of July 1, 2023. This actuarial valuation used the following actuarial assumptions, applied to all periods in the measurement:

	PERS
Investment Rate of Return	7.00%
Salary Scale (Based on Years of Service):	2.75%-6.55%
Inflation Rate – Price	2.75%
Inflation Rate – Wage	3.25%

Pre-retirement mortality rates were based on the Pub-2010 General Below-Median Income Employee mortality table with an 82.2% adjustment for males and 101.4% adjustment for females, and with future improvement from the base year of 2010 on a generational basis. Post-retirement mortality rates were based on the Pub-2010 General Below-Median Income Healthy Retiree mortality table with a 91.4% adjustment for males and 99.7% adjustment for females, and with future improvement from the base year of 2010 on a generational basis. Disability retirement rates used to value disabled retirees were based on the Pub-2010 Non-Safety Disabled Retiree mortality table with a 127.7% adjustment for males and 117.2% adjustment for females, and with future improvement from the base year of 2010 on a generational basis.

The actuarial assumptions used in the July 1, 2022 valuation were based on the results of an actuarial experience study for the period July 1, 2018 to June 30, 2021.

In accordance with State statute, the long-term expected rate of return on plan investments (7.00% at June 30, 2023) is determined by the State Treasurer, after consultation with the Directors of the Division of Investment and Division of Pensions and Benefits, the board of trustees and the actuaries. The long-term expected rate of return was determined using a building block method in which best-estimate ranges of expected future real rates of return (expected returns, net of pension plan investment expense and inflation) are developed for each major asset class. These ranges are combined to produce the long-term expected rate of return by weighting the expected future real rates of return by the target asset allocation percentage and by adding expected inflation.

11. PENSION PLANS (Continued)

Public Employees' Retirement System (Continued)

Best estimates of arithmetic rates of return for each major asset class included in PERS's target asset allocation as of June 30, 2023 are summarized in the following table:

Asset Class	Target Allocation	Long-Term Expected Real Rate of Return
U.S. Equity	28.00%	8.98%
Non-U.S. Developed Markets Equity	12.75%	9.22%
International Small Cap Equity	1.25%	9.22%
Emerging Markets Equity	5.50%	11.13%
Private Equity	13.00%	12.50%
Real Estate	8.00%	8.58%
Real Assets	3.00%	8.40%
High Yield	4.50%	6.97%
Private Credit	8.00%	9.20%
Investment Grade Credit	7.00%	5.19%
Cash Equivalents	2.00%	3.31%
U.S. Treasuries	4.00%	3.31%
Risk Mitigation Strategies	3.00%	6.21%
Total	100.00%	

PERS

Discount Rate - The discount rate used to measure the total pension liability was 7.00% as of June 30, 2023. The projection of cash flows used to determine the discount rate assumed that contributions from plan members will be made at the current member contribution rates and that contributions from employers and the nonemployer contributing entity will be based on 100% of the actuarially determined contributions for the State employer and 100% of actuarially determined contributions for the local employers. Based on those assumptions, the plan's fiduciary net position was projected to be available to make all projected future benefit payments of current plan members. Therefore, the long-term expected rate of return on plan investments was applied to all projected benefit payments in determining the total pension liability.

11. PENSION PLANS (Continued)

Public Employees' Retirement System (Continued)

Sensitivity of the Collective Net Pension Liability to Changes in the Discount Rate - The following presents the collective net pension liability of the participating employers as of June 30, 2023, calculated using the discount rate as disclosed above, as well as what the collective net pension liability would be if it were calculated using a discount rate that is 1-percentage-point lower or 1-percentage-point higher than the current rate:

		1%	Current	1%
		Decrease	Discount	Increase
	_	(6.00%)	(7.00%)	 (8.00%)
District's Proportionate Share of				
the Net Pension Liability	\$	157,946	\$ 120,316	\$ 90,165

Pension Plan Fiduciary Net Assets - Detailed information about each pension plan's fiduciary net Assets is available in the separately issued New Jersey Division of Pension and Benefits financial report. Information on where to obtain the report is indicated at the beginning of this note.

12. POSTEMPLOYMENT BENEFITS OTHER THAN PENSIONS (OPEB)

General Information about the OPEB Plan - The State Health Benefit Local Government Retired Employees Plan (the Plan) is a cost-sharing multiple-employer defined benefit other postemployment benefit (OPEB) plan with a special funding situation. It covers employees of local government employers that have adopted a resolution to participate in the Plan. The plan meets the definition of an equivalent arrangement as defined in paragraph 4 of GASB Statement No. 75, Accounting and Financial Reporting for the Postemployment Benefits Other Than Pensions (GASB Statement No. 75); therefore, assets are accumulated to pay associated benefits. For additional information about the Plan, please refer to the State of New Jersey (the State), Division of Pensions and Benefits' (the Division) Comprehensive Annual Financial Report (CAFR), which can be found at

https://www.state.nj.us/treasury/pensions/financial-reports.shtml.

The Plan provides medical and prescription drug to retirees and their covered dependents of the employers. Under the provisions of Chapter 88, P.L 1974 and Chapter 48, P.L. 1999, local government employers electing to provide postretirement medical coverage to their employees must file a resolution with the Division. Under Chapter 88, local employers elect to provide benefit coverage based on the eligibility rules and regulations promulgated by the State Health Benefits Commission. Chapter 48 allows local employers to establish their own age and service eligibility for employer paid health benefits coverage for retired employees.

12. POSTEMPLOYMENT BENEFITS OTHER THAN PENSIONS (OPEB) (Continued)

General Information about the OPEB Plan (Continued)

Under Chapter 48, the employer may assume the cost of postretirement medical coverage for employees and their dependents who: 1) retired on a disability pension; or 2) retired with 25 or more years of service credit in a State or locally administered retirement system and a period of service of up to 25 years with the employer at the time of retirement as established by the employer; or 3) retired and reached the age of 65 with 25 or more years of service credit in a State or locally administered retirement system and a period of service of up to 25 years with the employer at the time of service of up to 25 years with the employer at the time of service of up to 25 years with the employer; or 3) retired and reached the age of 65 with 25 or more years of service credit in a State or locally administered retirement system and a period of service of up to 25 years with the employer at the time of retirement as established by the employer; or 4) retired and reached age 62 with at least 15 years of service with the employer. Further, the law provides that the employer paid obligations for retiree coverage may be determined by means of a collective negotiations agreement.

Special Funding Situation - The District is considered to be in a special funding situation as defined by GASB Statement No 75 and the State is treated as a nonemployer contributing entity. Since the District does not contribute under this legislation directly to the plan, there is no net OPEB liability, deferred outflows of resources or deferred inflows of resources to report in the financial statements of the District related to this legislation. However, the notes to the financial statements of the District must disclose the portion of the nonemployer contributing entities' total proportionate share of the collective net OPEB liability that is associated with the District.

Basis of Presentation - The employer and nonemployer allocations and the schedule of OPEB amounts by employer and nonemployer (collectively, the Schedules) present amounts that are considered elements of the financial statements of its participating employers or the State as a nonemployer contributing entity. Accordingly, they do not purport to be a complete presentation of the financial position or changes in financial position of the participating employers or the State. The following disclosures were prepared in accordance with U.S. generally accepted accounting principles. Such preparation requires management of the Plan to make a number of estimates and assumptions relating to the reported amounts. Due to the inherent nature of these estimates, actual results could differ from those estimates.

12. POSTEMPLOYMENT BENEFITS OTHER THAN PENSIONS (OPEB) (Continued)

Allocation Methodology - GASB Statement No. 75 requires participating employers in the Plan to recognize their proportionate share of the collective net OPEB liability, collective deferred outflows of resources, collective deferred inflows of resources, and collective OPEB expense (benefit). The special funding situation's and nonspecial funding situation's net OPEB liability, deferred outflows of resources, deferred inflows of resources, and OPEB expense (benefit) are based on separately calculated total OPEB liabilities. For the special funding situation and the nonspecial funding situation, the total OPEB liabilities for the year ended June 30, 2023 were \$3,461,898,890 and \$11,427,677,896, respectively. The nonspecial funding situation's net OPEB liability, deferred outflows of resources, deferred inflows of resources, and OPEB situation's net OPEB liability, deferred outflows of resources, deferred inflows of resources, and OPEB situation's net OPEB liability, deferred outflows of resources, deferred inflows of resources, and OPEB situation's net OPEB liability, deferred outflows of resources, deferred inflows of resources, and OPEB expense (benefit) are further allocated to employers based on the ratio of the plan members of an individual employer to the total members of the Plan's nonspecial funding situation during the measurement period July 1, 2022 through June 30, 2023. Employer and nonemployer allocation percentages have been rounded for presentation purposes; therefore, amounts presented in the schedule of OPEB amounts by employer and nonemployer may result in immaterial differences.

Net OPEB Liability - The State of New Jersey's net OPEB liability, as of June 30, 2023 was \$15,006,539,477. Of this amount, the net OPEB liability attributable to the District was \$0. The State of New Jersey's proportionate share of the net OPEB liability is 100%, including the proportion attributable to the District of 0.000000%. The total OPEB liability for the District measured as of June 30, 2023 is \$0 as a result of the Special Funding Situation with the State of New Jersey.

The total OPEB liability as of June 30, 2024 was determined by an actuarial valuation as of July 1, 2022, which was rolled forward to June 30, 2023. The actuarial assumptions vary for each plan member depending on the pension plan the member is enrolled in. This actuarial valuation used the following actuarial assumptions, applied to all periods in the measurement:

Salary increases*: Public Employees' Retiremen Rate for all future years	t System (PERS) 2.75% to 6.55 based on years of service
Police and Firemen's Retirem Rate for all future years	ent System (PFRS) 3.25% to 16.25% based on years of service
Mortality: PERS	Pub-2010 General classification headcount weighted mortality with fully generational mortality improvement projections from the central year using Scale MP-2021
PFRS	Pub-2010 Safety classification headcount weighted mortality with fully generational mortality improvement

projections from the central year using Scale MP-2021

12. POSTEMPLOYMENT BENEFITS OTHER THAN PENSIONS (OPEB) (Continued)

Net OPEB Liability – (Continued)

* Salary increases are based on years of service within the respective plan.

Actuarial assumptions used in the July 1, 2022 valuation were based on the results of the PFRS and PERS experience studies prepared for July 1, 2018 to June 30, 2021.

100% of active members are considered to participate in the Plan upon retirement.

Discount Rate - The discount rate for June 30, 2023 was 3.65%. This represents the municipal bond return rate as chosen by the State. The source is the Bond Buyer Go 20-Bond Municipal Bond Index, which includes tax-exempt general obligation municipal bonds with an average rating of AA/Aa or higher. As the long-term rate of return is less than the municipal bond rate, it is not considered in the calculation of the discount rate, rather the discount rate is set at the municipal bond rate.

Sensitivity of Total Nonemployer OPEB Liability to changes in the discount rate -

The following presents the collective net OPEB liability of the participating employers as of June 30, 2023, respectively, calculated using the discount rate as disclosed above as well as what the total nonemployer OPEB liability would be if it was calculated using a discount rate that is 1-percentage point lower or 1-percentage point higher than the current rate:

June 30, 2023						
At 1.00% Decrease	At Discount Rate	At 1.00% Increase				
2.65%	3.65%	4.65%				
\$ 17,382,355,978	15,006,539,477	13,095,561,553				

Sensitivity of Total Nonemployer OPEB Liability to changes in the healthcare trend rate -The following presents the collective net OPEB liability as of June 30, 2023, calculated using the healthcare trend rate as disclosed above as well as what the net OPEB liability would be if it was calculated using a healthcare trend rate that is 1- percentage point lower or 1percentage point higher than the current rate:

	June 30, 2023	
	Healthcare Cost	
1.00% Decrease	Trend Rate	1.00% Increase
\$ 12,753,792,805	15,006,539,477	17,890,743,651

12. POSTEMPLOYMENT BENEFITS OTHER THAN PENSIONS (OPEB) (Continued)

OPEB Expense, **Deferred Outflows of Resources and Deferred Inflows of Resources Related to OPEB -** The District's proportionate OPEB benefit, as of June 30, 2023 was (\$29,459). The District had proportionate deferred outflows of resources and deferred inflows of resources from the following sources:

	2	Deferred Outflows of Resources	Deferred Inflows of Resources
Differences between expected and actual experience	\$		\$
Changes of assumptions			
Net difference between projected and actual earnings on OPEB plan investments			
Changes in proportion		106,033	242,912
Total	\$	106,033	\$ 242,912

Additional Information – The following is a summary of the collective balances of the local group at June 30, 2023:

	6/30/2023	6/30/2022
Collective Deferred Outflows of Resources	\$ 2,635,934,069	\$ 2,993,464,316
Collective Deferred Inflows of Resources	8,319,630,129	8,504,994,107
Collective Net OPEB Liability	15,006,539,477	16,149,595,478
District's Portion	0.000000%	0.000000%

The collective amounts reported as deferred outflows of resources and deferred inflows of resources related to OPEB will be recognized in OPEB expense as follows:

Year	OPEB		
2024	\$ (1,702,483,126)		
2025	(1,394,440,795)		
2026	(754,368,466)		
2027	(353,621,247)		
2028	(713,799,887)		
Thereafter	<u>(</u> 764,982,539)		
Total	\$ (5,683,696,060)		

13. PREPAID EXPENSE

Prepaid expenses represent expenses paid in advance, which creates a benefit beyond the current period. As of June 30, 2024, the District had \$1,181 in prepaid expenses.

14. RELATED PARTY TRANSACTIONS

On occasion, certain activities related to the land development industry may be provided by Board Supervisors as a professional service to a developer. In such cases and in accordance with N.J.S.A. section 52:13D, the applicable Board Supervisor recuses him, or herself, from any decisions concerning these applications. The New Jersey State Soil Conservation Committee approves the appointments of all Board Supervisors.

15. SUBSEQUENT EVENTS

There were no material events between June 30, 2024 and December 16, 2024 affecting the financial status of the Cumberland-Salem Soil Conservation District.

End of Notes to Financial Statements

CUMBERLAND-SALEM SOIL CONSERVATION DISTRICT
STATEMENT OF BUDGET VERSUS ACTUAL REVENUE & EXPENDITURES -
ALL FUNDS COMBINED
FOR THE YEAR ENDED JUNE 30, 2024

		General		
	 Budget	 Actual		Variance
Revenues		 		
Soil Erosion & Sediment Control Fees	\$ 200,000	\$ 261,924	\$	61,924
County Funding	15,000	15,000		
RFA Income	4,800	14,735		9,935
Interest	18,000	5,133		(12,867)
Total Revenues	237,800	296,792		58,992
<u>Expenditures</u>				
Salaries and Wages	140,000	94,856		45,144
Health Benefits	18,000	9,161		8,839
Pension	15,000	12,468		2,532
Payroll Taxes	18,000	7,622		10,378
Professional Services	8,000	12,604		(4,604)
Maintenance and Repairs - Building	8,500	6,061		2,439
Office Expenses/Supplies	6,700	8,468		(1,768)
Insurance	8,200	6,616		1,584
Professional/Training	3,500	2,950		550
Utilities	8,500	7,109		1,391
Vehicle	4,100	2,466		1,634
	\$ 238,500	170,381	\$	68,119
Adjustments:				
Depreciation		854		
Total Expenditures - to Exhibit B(2)		\$ 171,235		
			- C	

CUMBERLAND-SALEM SOIL CONSERVATION DISTRICT COMMENTS AND RECOMMENDATIONS FOR THE YEAR ENDED JUNE 30, 2024

COMMENTS

Administrative Practices and Procedures

Purchases shall be in conformance with the State Public Contracts Law for securing formal bids on purchases in excess of \$17,500 and on Quotations are required to be sought for purchases over \$2,625, where it is possible to solicit more than one quotation. If there is a reason why quotations are not solicited, a brief explanation regarding this should be documented and included in the District minutes. For purchases, which are unusual or not routine in nature, a policy should be adopted addressing such purchases. Any suggested policy should be reviewed with the solicitor. In addition, when making purchases utilizing the state contract system, the award of such a contract shall be authorized by a resolution of the Board of Supervisors as required by **N.J.A.C.** 5:34-1.2. No exceptions were noted.

Chapter 251 fees collected appear to be in accordance with the adopted fee schedule.

The District was in compliance with the <u>Financial Accounting Manual for New Jersey Soil</u> <u>Conservation Districts</u>, which states that all checks must have two signatures, at least one of which shall be the District chairman.

The District's surety bond coverage appears to be in accordance with the minimum requirements noted in the **Financial Accounting Manual for New Jersey Soil Conservation Districts**.

Financial Planning, Accounting and Reporting

Revenues and receipts appear to be recorded properly and deposited on a timely basis.

Bank Statements are reconciled monthly. Sources of revenues and receipts are able to be traced to files.

The District's payroll reports appear to be filed on a timely basis and the amounts withheld as payroll deductions appear to be remitted properly.

Expenditures are to be evidenced by adequate supporting documentation, including notation of date of payment and check number. No exceptions were noted with regard to expenditure documentation.

In August 2015, a revised **Financial Accounting Manual for New Jersey Soil Conservation Districts** was adopted by the NJ State Soil Committee, which contained a new uniform budget format. The 2023-24 District budget was presented in an acceptable format, as prescribed by the revised financial accounting manual.

CUMBERLAND-SALEM SOIL CONSERVATION DISTRICT COMMENTS AND RECOMMENDATIONS FOR THE YEAR ENDED JUNE 30, 2023

<u>Findings</u>

None

Status of Prior Year Findings

None

Appreciation

We wish to express our appreciation for the assistance and courtesies rendered to us by the officials during the course of the audit.

Should any questions arise as to our comments, please do not hesitate to call us.