



ST. LOUIS MO 63120

FINANCIAL REPORT

CONSOLIDATED SEWERAGE

DISTRICT NO. 1

PARISH OF JEFFERSON

STATE OF LOUISIANA

DECEMBER 31, 1998

Under provisions of state law, this report is a public document. A copy of this report has been submitted to the audited, or reviewed, entity and other appropriate public officials. The report is available for public inspection at the Baton Rouge office of the Legislative Auditor and, where appropriate, at the office of the parish clerk of court.

Reference Date 8-6-22

FINANCIAL REPORT

FRANKLIN COUNTY NEWBARD DISTRICT NO. 1

PERIOD OF OPERATION

STATE OF VERMONT

DECEMBER 31, 1999

TABLE OF CONTENTS

Page

FINANCIAL SECTION

INDEPENDENT AUDITOR'S REPORT	1
 COMPONENT UNIT FINANCIAL STATEMENTS	
Balance Sheet.....	2-3
Statement of Revenues, Expenses and Changes in Retained Earnings.....	4
Statement of Cash Flows.....	5-6
Notes to Financial Statements.....	7

SPECIAL REPORTS

SPECIAL REPORTS ON CERTAIN PUBLIC ACCOUNTANTS

Independent Auditor's Report on Structure Based on an Audit of Financial Statements Performed in accordance with Government Auditing Standards.....	20
Independent Auditor's Report on Compliance with Laws and Regulations Based on an Audit of Financial Statements Performed in accordance with Government Auditing Standards.....	24

UNIVERSITY OF CALIFORNIA, BERKELEY



INDEPENDENT AUDITOR'S REPORT

To the Honorable Parish President and
The Honorable Jefferson Parish Council
Jefferson Parish, Louisiana

We have audited the accompanying financial statements of the Consolidated Sewerage District No. 1 of the Parish of Jefferson, State of Louisiana (the District), as of and for the year ended December 31, 1996, as listed in the table of contents. These financial statements are the responsibility of the District's management. Our responsibility is to express an opinion on these financial statements based on our audit. The financial statements of the District as of and for the year ended December 31, 1995, were audited by other auditors whose report dated April 25, 1996, expressed an unqualified opinion on those statements.

We conducted our audit in accordance with generally accepted auditing standards, **Government Auditing Standards**, issued by the Comptroller General of the United States, and provisions of Office of Management and Budget (OMB) Circular A-128, "Audits of State and Local Governments." These standards and OMB Circular A-128 require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free of material misstatement. An audit includes examining, on a test basis, evidence supporting the amounts and disclosures in the financial statements. An audit also includes assessing the accounting principles used and significant estimates made by management, as well as evaluating the overall financial statement presentation. We believe that our audit provides a reasonable basis for our opinion.

As discussed in Note A, the financial statements present only the Consolidated Sewerage District No. 1 and are not intended to present fairly the financial position of the Parish of Jefferson, State of Louisiana, and the results of its operations and cash flows of its proprietary fund types and nonproprietary trust funds in conformity with generally accepted accounting principles.

In our opinion, the financial statements referred to above present fairly, in all material respects, the financial position of the Consolidated Sewerage District No. 1 of the Parish of Jefferson, State of Louisiana, as of December 31, 1996, and the results of its operations and cash flows for the year then ended in conformity with generally accepted accounting principles.

In accordance with **Government Auditing Standards**, we have also issued a report dated April 10, 1997 on our consideration of the District's internal control structure and a report dated April 10, 1997 on its compliance with laws and regulations.

Luther C. Spight & Company
April 30, 1997

CONSOLIDATED SEWERAGE DISTRICT NO. 1
Jefferson Parish, Louisiana
Balance Sheets

December 31, 1988 and 1985

ASSETS	<u>1988</u>	<u>1985</u>
Current assets		
Cash		
Share of pooled assets	\$ 2,008,340	\$ 1,828,221
Receivables		
Accounts	3,488,807	2,019,484
All other bills	4,890,245	4,721,571
Due from other governments	8,438	6,287
Inventory, at average cost	1,811,194	1,438,763
Prepaid expenses	<u>18,008</u>	<u>33,219</u>
Total current assets	<u>\$ 11,890,087</u>	<u>\$ 10,037,485</u>
Restricted assets		
Construction fund	<u>23,487,337</u>	<u>21,740,787</u>
Property, plant, and equipment		
Land	11,718,202	11,948,811
Plant and equipment	<u>484,485,402</u>	<u>381,758,873</u>
	496,193,604	393,707,684
Less accumulated depreciation	<u>(73,873,873)</u>	<u>(95,362,868)</u>
Total property, plant, and equipment	<u>\$ 422,319,731</u>	<u>\$ 298,344,816</u>
TOTAL ASSETS	<u>\$ 577,504,873</u>	<u>\$ 368,716,692</u>

(Continued)

CONSOLIDATED SEWERAGE DISTRICT NO. 1
Jefferson Parish, Louisiana
Balance Sheets

December 31, 1990 and 1989

LIABILITIES AND FUND EQUITY	1990	1989
Current liabilities		
Accounts payable	\$ 897,422	\$ 430,443
Accrued payroll expenses	1,557,906	1,458,769
Accrued claims payable	-	-
Deferred revenue	4,969,714	4,843,848
Total current liabilities	7,225,042	6,733,060
Fund equity		
Contributed capital		
Parish	19,449,567	19,939,938
Subscribers	13,432,368	13,815,929
Citizens	3,188,278	3,283,909
Air pollution tax bonds	8,012,188	8,743,319
Sales tax bonds	242,583,773	235,621,800
State	88,529	85,108
Federal government	50,927,028	52,085,624
Total contributed capital	328,179,771	329,732,644
Retained earnings		
Reserved for construction	23,487,377	21,740,787
Unreserved	11,686,783	10,512,677
Total retained earnings	35,174,160	32,253,464
Total fund equity	363,353,931	361,986,108
TOTAL LIABILITIES AND FUND EQUITY	\$ 3,377,694,673	\$ 3,395,719,168

The accompanying notes are an integral part of this statement.

CONSOLIDATED SEWERAGE DISTRICT NO. 1
Jefferson Parish, Louisiana
Statements of Revenues, Expenses and Changes in Retained Earnings

For the Years Ended December 31, 1996 and 1995

	<u>1996</u>	<u>1995</u>
Operating revenues		
Service charges	\$ 14,836,271	\$ 12,760,640
Delinquent charges	299,145	346,314
Sewer connection fees	43,237	34,650
Other service charges	<u>133,895</u>	<u>121,659</u>
Total operating revenues	<u>14,901,858</u>	<u>13,294,863</u>
Operating expenses		
Personal services - Salaries & wages	5,011,594	4,887,625
Personal services - Employee benefits	1,232,735	1,288,630
Supplies	2,323,287	2,247,784
Purchased Services - Professional and Technical	8,181,768	8,308,873
Purchased Services - Property	3,456,547	3,880,821
Purchased Services - Other	1,721,139	1,324,756
General	103,892	68,893
Depreciation	<u>8,858,103</u>	<u>8,398,817</u>
Total operating expenses	<u>28,360,438</u>	<u>27,112,374</u>
Operating income (loss)	<u>(13,859,775)</u>	<u>(13,817,838)</u>
Nonoperating revenues (expenses)		
Taxes	4,762,701	4,568,172
State revenue sharing	317,803	323,138
Federal grants	-	84,238
Interest income	1,491,805	1,538,529
Construction sewer availability fees	401,702	482,500
Probable claims	-	1,868
Gain on transfer of fixed assets	<u>-</u>	<u>31,405</u>
Nonoperating revenues (expenses)	<u>6,923,328</u>	<u>6,935,941</u>
Income (loss) before operating transfers	<u>(5,968,448)</u>	<u>(5,885,997)</u>
Operating transfers in	<u>1,508,302</u>	<u>851,958</u>
Net income (loss)	<u>(5,968,448)</u>	<u>(5,035,939)</u>
Add depreciation on property, plant, and equipment acquired by capital contributions that reduces contributed capital	<u>8,318,142</u>	<u>7,988,791</u>
Increase in retained earnings	<u>2,650,694</u>	<u>1,953,853</u>
Retained earnings, January 1	<u>32,253,494</u>	<u>30,299,611</u>
Retained earnings, December 31	<u>\$ 33,158,162</u>	<u>\$ 32,253,494</u>

The accompanying notes are an integral part of this statement.

CONSOLIDATED SEWERAGE DISTRICT NO. 1
Jefferson Parish, Louisiana
Statements of Cash Flows

For the Years Ended December 31, 1996 and 1995

	1996	1995
Cash flows from operating activities		
Operating income (loss)	\$ (13,891,718)	\$ (13,917,828)
Adjustments to reconcile operating income to net cash provided by operating activities		
Depreciation	8,958,903	8,398,817
Changes in assets and liabilities		
(Increase) decrease in receivables	(1,452,373)	173,917
(Increase) decrease in inventory	(75,433)	(151,827)
(Increase) decrease in prepaid expenses	13,370	(1,837)
Increase (decrease) in payables	298,878	(435,803)
Increase (decrease) in accrued liabilities	58,157	38,812
Total adjustments	7,518,665	8,018,977
Net cash provided by (used for) operating activities	(6,373,053)	(5,788,951)
Cash flows from noncapital financing activities		
Taxes	4,715,000	4,598,000
State revenue sharing	317,800	323,138
Federal grants	-	64,238
Probable claims	-	(118,352)
Operating transfers from other Jefferson Parish funds	1,800,000	881,058
Net cash provided by (used for) noncapital financing activities	6,532,800	5,748,125
Cash flows from capital and related financing activities		
Acquisition of fixed assets	(187,448)	(385,916)
Addition from Lien Ordinance 1918	-	-
Construction sewer availability fees	451,708	452,900
Net cash provided by (used for) capital and related financing activities	264,260	166,984

(Continued)

CONSOLIDATED SEWERAGE DISTRICT NO. 1
Jefferson Parish, Louisiana
Statements of Cash Flows (Continued)

For the Years Ended December 31, 1998 and 1997

	1998	1997
Cash flows from investing activities:		
Interest on investments	\$ 1,451,889	\$ 1,539,520
Net cash provided by (used for) investing activities	1,451,889	1,539,520
Net increase (decrease) in cash and cash equivalents	1,837,712	1,958,868
Cash and cash equivalents, January 1	23,575,808	22,004,340
Cash and cash equivalents, December 31	\$ 25,413,520	\$ 23,970,008
NONCASH INVESTING, CAPITAL, AND FINANCING ACTIVITIES		
Contributions of capital	\$ 12,757,379	\$ 21,428,143
Acquisitions of fixed assets with capital contributions	(12,757,379)	(21,428,143)
Change in estimate of accrued claims payable	-	(120,000)
Effect on net income for change in estimate of accrued claims payable	-	120,000
	\$ -	\$ -
Cash and cash equivalents at December 31 consists of:		
Current assets:		
Cash	\$ -	\$ -
Share of pooled assets	2,090,343	1,829,221
	2,090,343	1,829,221
Restricted assets:		
Share of pooled assets	23,407,577	21,340,787
Total	\$ 25,413,520	\$ 23,970,008

The accompanying notes are an integral part of this statement.

HOW TO FINANCIAL STATEMENTS

COMBINED REPORTS OF THE COMMISSIONERS OF THE DISTRICT OF COLUMBIA
OF THE DISTRICT OF COLUMBIA
STATE OF MARYLAND
DECEMBER 31, 1989

NOTE 4 - SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

Consolidated Budget District No. 1 of the Parish of Jefferson (the District) was created effective January 1, 1988, pursuant to Ordinance #1808, adopted by the Jefferson Parish Council on November 9, 1987, and consists of all of the territory within the Parish that was consolidated Budget District of Jefferson Parish and East East Consolidated Budget District of the Parish of Jefferson, Louisiana which included the former Budget District No. 1 of the Parish of Jefferson, State of Louisiana, Budget District No. 11 of the Parish of Jefferson, State of Louisiana, Budget District No. 10 of the Parish of Jefferson, State of Louisiana and Budget District No. 13 of the Parish of Jefferson, State of Louisiana. The District was established for the purpose of providing financial services for the unincorporated areas of Jefferson Parish, Louisiana. The financial statements of the District have been prepared in conformity with generally accepted accounting principles (GAAP) as applicable to governmental units. The accounting principles discussed herein comply with the accepted standard setting body for establishing governmental accounting and financial reporting principles. The more significant of the District's accounting policies are described below.

1. ACCOUNTING METHOD

The District's accounting purposes are conformable with governmental accounting standards Board Statement for Financial Reporting purposes in conformity with governmental accounting standards Board Statement No. 1, The District is a component unit of Jefferson Parish, Louisiana. The Parish, the reporting entity (the accounting unit), the accounting financial statements present information only as to the transactions of the District and are not intended to present fairly the financial position and results of operations of Jefferson Parish, Louisiana.

2. FUND ACCOUNTING

The accounts of the District are organized and operated on a fund basis whereby a separate self-balancing set of accounts that comprises the assets, liabilities, fund equity, revenues and expenses is maintained for the purpose of carrying on specific activities or attaining specific objectives in accordance with special regulations, restrictions or limitations. The District is presented in the accompanying financial statements as follows:

A. Proprietary Fund

(1) The Proprietary Fund is used to account for operations that are financed and operated in a manner similar to private business enterprises where the intent of the governing body is that the consequences, including depreciation of providing goods or services to the general public as a continuing basis be financial or nonfinancial priority through user charges.

B. Sales of Inventory

The Proprietary Fund is accounted for using the accrual basis of accounting whereby revenues are recognized when they are earned and expenses are recognized when incurred.

In accordance with paragraph 10, 20 of the Governmental Accounting Standards Board (GASB), "Accounting and Financial Reporting for Proprietary Funds and Other Governmental Entities That Use Proprietary Fund Accounting," it is the District's policy to apply all applicable new pronouncements as well as all financial reporting standards issued by the GASB and the FASB. Accounting for long-term debt operations are accounted for through the use of the modified accrual basis of accounting. Prior to January 1, 1989, certain financial reporting standards issued by the GASB and the FASB were not adopted and financial reporting standards issued by the GASB and the FASB were not adopted and financial reporting standards issued by the GASB and the FASB were not adopted and financial reporting standards issued by the GASB and the FASB were not adopted after December 31, 1989.

4. Cash, Investments and Other Financial Assets

The District's cash, investments and other financial assets are carried on the appropriate Jefferson Parish consolidated financial statements by the reporting entity on the accrual basis. The District's cash and investments are carried on each fund's consolidated "Statement of Financial Assets" balance. Investments are carried on each fund's consolidated financial statements.

The purposes of the Statement of Cash Flows, each and each organization include all highly liquid investments (including restricted assets) with a maturity of three months or less than purchase.

Investments are carried at amortized cost, subject to adjustment for market and loss, judged to be more than temporary. Gains and losses on the purchase of investments are amortized over the life of the investment resulting from the date of purchase to the date of maturity.

CONSOLIDATED FINANCIAL STATEMENTS NO. 1
JEFFERSON PORTALS, INCORPORATED
Items in Financial Statements (Continued)
December 31, 1998

NOTE 6 - SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (Continued)

4. CASH, INVESTMENTS AND OTHER DEPOSIT ACCOUNTS (Continued)

All of the District's deposits, including cash and non-interest-bearing deposits, are carried at cost.

Investment securities permit the District to invest in United States bonds, Treasury notes, or certificates, or other obligations of the U.S. Government and securities of the U.S. Government which are Federal Reserve securities, and certificates of deposit of state banks registered under the laws of California and national banks having their principal office in the State of California, or in money market funds registered under the laws of California and which have underlying investments limited to securities of the U.S. Government or its agencies.

5. RESERVE FOR DEFECTIVE ACCOUNTS

The District has identified accounts receivable to be fully collectible accounting, as evidenced by doubtful accounts has been established. Uncollectible amounts are recognized as bad debts at the time delinquent amounts become due and would indicate the collectibility of the particular receivable.

6. EXPENSES

Inventory of materials and supplies in the District is valued at average cost.

7. REPAIRS AND MAINTENANCE

Included in restricted assets is the REPAIRS AND MAINTENANCE FUND ACCOUNT, which is used to aggregate these expenses accumulated by collection of other available fees to be used for capital improvements and restoration.

8. PROPERTY, PLANT AND EQUIPMENT

The costs of normal maintenance and repair that do not add to the value of the asset or substantially extend useful lives are not capitalized. Improvements are capitalized and depreciated over the remaining useful lives of the related fixed assets, as applicable.

Depreciation of these assets is computed using the straight-line method over the estimated useful lives of the assets. The estimated useful lives are as follows: Improvements are capitalized and depreciated over the remaining useful lives of the related fixed assets, as applicable. It is considered preferable under the matching concept, as receipts of these fixed assets have been recorded as additions to contributed capital.

Interest on capitalized or assets acquired with borrowed debt. The amount of interest to be capitalized is determined by identifying interest expense incurred from the date of the borrowing until completion of the project with interest defined as incurred proceeds over the same period.

9. CONTRIBUTIONS RECEIVED

Quarterly annual interest and 10% per cent interest are accrued when incurred to the District.

10. CONTRIBUTIONS

Contributed capital is recorded for assets acquired by contributions from developers, customers or other funds.

A portion of total restricted earnings of the District is reserved to include that a part of fund equity is legally restricted for a specific future use. Reserves for construction and from Project overhead and certain liabilities are provided for in the financial statements.

11. RECLASSIFICATION

Items in the District's financial statements have been reclassified from records previously reported for September 30, 1998.

CONSOLIDATED FINANCIAL STATEMENT No. 1
Jefferson Parish, Louisiana
Notes to Financial Statements (continued)
December 31, 1998

NOTE A - SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)

43. DEFERRED INCOME TAXES

For the year ended December 31, 1998, the District has implemented with treatment 88, reporting and financial reporting for Risk Financing and Related Insurance Income. The new standard requires a liability for taxes be reported if information prior to issuance of the financial statements indicated that it is probable that a liability has been incurred as the date of the financial statements. The reported amounts can be found in Note 5.

NOTE B - RECEIVABLES

Receivables consist of the following as December 31:

	<u>1998</u>	<u>1997</u>
Accounts	\$1,448,837	\$3,276,484
Due from other funds	1,799,000	4,797,897
Due from Other Governments	<u>8,668</u>	<u>8,138</u>
	<u>\$3,256,505</u>	<u>\$8,082,519</u>

The District maintains unbilled receivables at year-end to be those amounts for services received by customers in the current year, but not billed by 30 days of the 31st of the following year. This receivable amounts to \$7,882,853 for 1998 as compared to \$852,246 for 1997. This amount is included in the accounts receivable shown above.

The District had the following receivables due from other governments as of December 31, 1998:

Due from State of Louisiana	\$ 950
Due from Jefferson Parish Sheriff's Department	<u>7,688</u>
	<u>\$8,638</u>

NOTE C - DEFERRED ASSETS

Deferred assets are comprised of the following as December 31, 1998:

	<u>CONTRIBUTION</u>
	<u>1,000,000</u>
Amount of paid-in capital	<u>\$ 23,487,837</u>

CONSOLIDATED SEWERAGE DISTRICT NO. 1
 Jefferson Parish, Louisiana
 NOTES TO FINANCIAL STATEMENTS (Continued)
 DECEMBER 31, 1999

NOTE 3 - EQUIPMENT, FLEET, DEPRECIATION, ACCUMULATED DEPRECIATION & RESERVE

A summary of changes in property, plant, equipment, depreciation, and accumulated depreciation in progress by the year ended December 31, 1999 is as follows:

	BALANCE DECEMBER 31, 1998	ADDITIONS	NET TRANSACTIONS (TO) FROM OTHER FUNDS	BALANCE DECEMBER 31, 1999
Buildings	\$ 4,790,749	\$ -	\$ 1,270,048	\$ 6,060,797
Depreciation and distribution system	267,084,268	-	11,088,997	278,173,265
Other equipment (assets)	171,081,983	-	50,419	171,132,402
Leasehold improvements	88,024	-	-	88,024
Multi-use & vehicles	78,428	-	-	78,428
Equipment	2,114,208	187,662	64,171	2,365,941
Reserve	3,284,275	-	(25,893)	3,258,382
	\$4,790,749	\$187,662	\$11,397,066	\$6,060,797
	\$1,188,873	-	\$5,872	\$1,194,745
	\$6,060,749	\$187,662	\$11,402,938	\$7,651,349

LIFE	ACCUMULATED DEPRECIATION DECEMBER 31, 1999	DEPRECIATION 1999	NET TRANSACTIONS (TO) FROM OTHER FUNDS	ACCUMULATED DEPRECIATION DECEMBER 31, 1999
Buildings	\$ 47,882	\$ 64,185	\$ -	\$ 112,067
Collection and distribution system	26,497,267	1,070,214	-	27,567,481
Other equipment (assets)	25,170,867	1,688,379	-	26,859,246
Leasehold improvements	293,086	81,860	-	374,946
Multi-use & vehicles	478,289	58,873	-	537,162
Equipment	1,499,564	171,891	18,422	1,689,877
Reserve	4,170,499	89,189	(25,893)	4,233,795
	\$1,188,873	\$1,883,511	\$18,422	\$3,090,806

GENERALLED ACCOUNT STATEMENT NO. 1
Jefferson Parish, Louisiana
STATE OF LOUISIANA TRIENNIUM COMMISSION
December 31, 1990

NOTE 8 - PROPERTY, PLANT, EQUIPMENT, DEPRECIATION, AND CONSTRUCTION IN PROGRESS (Continued)

Increases of \$70,788,852 in property, plant, and equipment are the result of the capitalization of these assets constructed to December 31, 1990. These 1990 additions reported to the Parish's Independent Audit Financial Report. The Capital Program funds are funded primarily by a parcel-tax dedicated sales tax to construct and improve the sewer plants and sewer lines of the parish.

As of December 31, 1991, the costs of fifteen decommissioned plants and their related non-depleted capital accounts have been removed from property, plant and equipment. Current and future costs of elimination are added to remaining book value. Management is not aware of any potential future liabilities which might arise from regulatory or environmental concerns in regard to final disposition of these plants.

During the year ended December 31, 1990, land and the associated decommissioning costs totaling \$877,764 of the former waste treatment plant were transferred to the General Fund Asset Account Group of the Parish of Jefferson.

During the year ended December 31, 1990, improvements to the three projects located on Jefferson Highway were completed and the property was put into use by the Sewerage Division and the Storage and Control Storage Department. Costs associated with the projects of 4,388,852 for 1990 and 5,211,450 for 1991 were paid by the Sewer Capital Construction Fund and were capitalized. An agreement to reimburse the Sewer Capital Construction Fund for the costs associated with facilities used by the Storage and Control Storage Department will be reached under a reimbursement program beginning in 1992.

During the year ended December 31, 1990, land and the associated decommissioning costs totaling \$877,764 of the former West Baguerre Group Incinerator Plant were transferred to the Library Division of the Parish of Jefferson.

Construction in progress is comprised of the following at December 31, 1990:

	PROJECT ACCOMPLISHED	EXPENSE TO DECEMBER 31, 1990	COMPLETED	REVENUE EARNED ACCUMULATED
Plant and Line Improvements	<u>\$ 1,100,000</u>	<u>1,100,000</u>	<u>1,100,000</u>	NONE

NOTE 9 - EMPLOYEE BENEFITS

Full-time classified employees of the Parish hired prior to April 26, 1986, are permitted to accumulate and carry forward time and calendar year to the next a maximum of 90 days of accrued vacation leave earned and an unlimited number of days of accrued sick leave. Upon termination of employment, an employee is paid for his accumulated annual leave and, after 10 years of employment, has the option of receiving reimbursement totaling 11 2/3 days of sick leave for one-half of his accumulated sick leave. An employee who has a current balance of 30 or more days of accrued leave may be reimbursed for any number up to, but not in excess of, 30 days. For incentive purposes, requests for reimbursement must be submitted to the Finance Department in writing no later than October 1 of the year preceding the year in which reimbursement is to be made. At December 31, 1990 the amount of accrued annual and sick leave, and salary-related costs was \$1,341,850 as compared to \$1,301,000 at December 31, 1989.

Part-time classified employees hired after April 26, 1986, are permitted to carry forward no more than 30 days of accrued vacation leave earned and an unlimited number of days of accrued sick leave. Upon termination of employment, an employee is paid for his accumulated annual leave and after 10 years of employment 10 days is paid up to 30 days of accrued sick leave.

Retiree related costs (i.e., Medicare, Social Security, etc.) have been accrued as of December 31, 1990 in accordance with GASB Statement #14 for those employees hired after April 26, 1986. Accruals of prior periods are not considered necessary because the accruals were immaterial.

CONSOLIDATED SUPERVISOR CONTRACT NO. 1
 NATIONAL FIRE INSURANCE CO. OF NEW YORK
 100 WALL STREET, NEW YORK 6, N.Y.
 DECEMBER 31, 1966

NOTE 1 - CHANGE IN CONTRIBUTED CAPITAL

A summary of changes in contributed capital accounts for the year ended December 31, 1966 follows:

	SHARES	RESERVE	DEFERRED	ARITHMETIC PROGRESS	SHARES ISSUED	SHARES REDEEMED	TOTAL
Balance at 12/31/65	1,254,000	1,247,500	1,248,000	1,248,000	220,000	1,150,000	2,000,000
Transfer to and from Reserve for Contingencies	-	-	-	-	11,700,000	-	11,700,000
Transfer to and from amounts from other operations for the year	10,000	-	-	-	-	-	10,000
Public offering proceeds for the year ended 12/31/66 net of amounts applied to dividend requirements	1,000,000	1,000,000	1,000,000	1,000,000	-	-	4,000,000
Balance at 12/31/66	2,264,000	2,247,500	2,248,000	2,248,000	131,700,000	1,150,000	137,000,000

CONSOLIDATED FINANCIAL STATEMENTS
Continental Electric, Inc.
Notes to Financial Statements (Continued)
December 31, 1990

NOTE 3 - DEFERRED INCOME TAXES

Deferred earnings reserved for construction are as follows:

	<u>TOTAL</u>
Balance, 12/31/89	\$21,368,767
Plant Overhead Fees	201,700
Interest Earned	1,546,890
Transfers Out	(1,000,000)
Balance, 12/31/90	<u>\$22,117,357</u>

NOTE 4 - SERVICE CHARGE RATES

Pursuant to Ordinance #1862, adopted by the Jefferson Parish (LA) on February 9, 1989 amending existing sewer service charges, the following average service rates were applied to billings for all users of the System effective February 15, 1990:

MONTHLY SERVICE CHARGE BILLING

<u>SEWER RATE (MONTHLY)</u> \$/ft ³ of Sewer	#
1	1,000
2	1,700
3	1,700
4	1,700
5	1,000
6	20,000
7	20,000
8	20,000
9	20,000
10	20,000
11	20,000
12	20,000

BI - MONTHLY SERVICE CHARGE BILLING

<u>SEWER RATE (MONTHLY)</u> \$/ft ³ of Sewer	#
1	2,000
2	2,000
3	2,000
4	2,000
5	2,000
6	2,000
7	2,000
8	2,000
9	2,000
10	2,000
11	2,000
12	2,000

Additionally, average sewer rates for residential customers were amended to provide for a volume charge which applies to 80% of total water consumption for which a minimum volume (100) gallon) rate charge of \$1.00 per thousand gallons plus a minimum charge of \$1.00 for monthly accounts and \$2.00 for bi-monthly accounts.

COMMUNITY DEVELOPMENT DISTRICT NO. 1
227 North Third, Louisiana
Notes to Financial Statements (Continued)
December 31, 1990

NOTE 1 - 50 MILLION TAX

The Parish levies an ad valorem tax on property as of December 31 of each year to finance the budget for the following year. The tax is due and becomes an enforceable lien on the property on the first day of the month following the filing of the tax rolls by the assessor with the Louisiana Tax Commission (commencing January 15, the tax is enforceable 30 days after the date). Taxes are levied based on property values determined by the Jefferson Parish Assessor's office. All land and residential improvements are categorized in percent of fair market value, and other property at 75 percent of fair market value. Taxes are billed and collected by the Jefferson Parish Sheriff's Department which receives a certain mileage for his services. The taxes collected by the Sheriff's Department to the Parish are net of assessor's commission and parish fund contribution. An valuation study was conducted on revenue of the parish for which several thousand property tax audits were levied to finance the budget for 1990 and recorded as revenue for the year 1989. The 1990 property tax audit was levied to finance the budget for 1990 is recorded as deferred revenue at December 31, 1990.

For the year ended December 31, ad valorem taxes were levied on behalf of the District as follows:

<u>EXPENSE</u>	<u>1990</u>	<u>1989</u>
Maintenance and operations:	1000	1000
Special interest coverage insurance No. 1	4.50	1.0

NOTE 2 - INTEREST COST

All interest cost was capitalized during the years ended December 31, 1989 and 1990.

NOTE 3 - OPERATING EXPENSES

The District had the following operating expenses during the year ended December 31, 1990:

<u>OPERATING EXPENSE TO OR FROM</u>	<u>OPERATING EXPENSE</u>	<u>OPERATING REVENUE</u>
	<u>1990</u>	<u>1990</u>
Debt Capital Program	<u>\$1,500,000</u>	<u>0</u>

CONSOLIDATED FINANCIAL STATEMENTS
of
DEFENDERS FUND, INC.
a Delaware Corporation
Successor to Financial Services Corporation
December 31, 1990

NOTE 1 - Risk Management

GENERAL LIABILITY

The Fund is exposed to various risks of loss related to torts (both actual and potential), damage to, and destruction of property, products and operations, injuries to employees and insured operations. To protect the Fund against the potential risks of loss, the Fund has established a General Liability Fund (an internal service fund). Under this program, the General Liability Fund provides coverage for up to a maximum of \$500,000 for each partner's completed claims, \$500,000 for each general liability claim, and \$200,000 for each subsequent claim. The Fund also purchases commercial insurance for claims in excess of coverage provided by the Fund.

The Fund's netted payments to the Fund based on management's estimates of the amounts needed to pay prior and current year claims. These "netted" payments are reported as "qual-recovered transactions." The Fund's payments were \$1,352,000 and \$1,552,000 for 1990 and 1989, respectively.

As December 31, 1990, the total outstanding claims liability of the General Liability Fund was \$27,500,000, which includes an estimated liability for reported but not reported claims of \$6,750,000. The estimated claim liability is determined by the company's administrator based on historical experience and anticipated payments. These liabilities are based on the requirements of GAAP Statement 10, "Accounting and Financial Reporting for Risk Retention and Related Insurance Issues," which requires that a liability for claims be reported if management prior to the issuance of the financial statements believes that it is probable and the amount of the loss can be reasonably estimated. Claims liability is not available by individual Fund.

HEALTH INSURANCE

The Fund provides health and medical insurance to its employees exclusively through health insurance organizations (HMOs) and plans of service organizations (POSs). Under these types of programs, the Fund's most initial problems faced on the level of the employee's participation and has no further liabilities on any claims.

The total amount of contributions by the Fund for health insurance was \$67,200 and \$670,200 for 1990 and 1989, respectively.

EMPLOYEE DEFERRED SAVINGS

The Fund is self-insured for unemployment claims filed with the state. To protect for and finance these claims, the Fund has established a self-insured fund (an internal service fund) whereby each Fund contribution 20 percent of its annual payroll into the fund. In 1990, the contribution was temporarily suspended and its cash (less an additional funding to needed to cover outstanding claims. The internal "premium" is reported as "qual-recovered transactions."

NOTE 2 - CONTRACTS AND CONTINGENCIES

PROFESSIONAL SERVICES

During 1989, the former partner consolidated coverage district entered into a professional service agreement with Parsons Corporation, Inc. to provide operation and maintenance services for the East Side Wastewater Treatment Plant. The agreement is for a period of five years and if the District's observation may be renewed for five consecutive two year terms. The contract was renewed in 1990 for a two year term. Payments include all operational costs of the East Side Wastewater Treatment Plant and personnel, and all administration and maintenance expenses incurred with the proper operation, maintenance and management of a wastewater treatment facility in accordance with the operating budget submitted to the District's management annually.

Additional payments required under this agreement include to management fee of \$700,000 annually. It and interest fee equal to 10 percent of any variation in total operation and maintenance being paid annually up to \$100,000. Its performance incentive fee based on mathematical comparison as provided in the agreement up to \$100,000.

Payments under this agreement totaled \$7,887,901 for 1990 as compared to \$1,826,700 for 1989.

SHELL SERVICE (MISSISSIPPI) COMPANY, INC.
Jefferson Parish, Louisiana
Notes to Financial Statements (Continued)
December 31, 1998

NOTE 4 - COMMITMENTS AND CONTINGENCIES (Continued)

LITIGATION

The District is a defendant in a number of claims and lawsuits resulting or allegedly from personal injury, property damage, and construction claims. The Parish Attorney and the outside law firm of The Parish's Risk Management Firm have reviewed these claims and lawsuits in order to evaluate the likelihood of an unfavorable outcome to the District and to advise, if any, of the amount or range of potential loss to the District, as a result of such review, the various claims and lawsuits have been categorized into "settled", "reasonably possible" and "remote" contingencies, as defined in National Council on Accounting Related to Settlements, A PCAI Status and Judgment. Loss potential estimated at 1-10% categorized as "settled" have been accrued as other liabilities of the District at December 31, 1998. The District's "reasonable possible" loss contingencies at December 31, 1998, for which an amount of liability can be estimated, approximate 1-10%.

NOTE 5 - PENSION PLAN

The District's employees participate in the retirement system described below. Total pension expense recorded by the District for contributions to the retirement system for the year ended December 31, 1998 was \$485,470 as compared to \$426,461 for December 31, 1997.

Actuarial data and other information of the two plans, as it relates to the District, is unavailable for the separate component units of the Parish.

PLAN DESCRIPTION

Subject to the rules of the Parish's Full-Time Employees, except the Firemen, are participants in the Employees' Retirement System of Jefferson Parish (the Parish Plan), a single-employer defined benefit pension plan, and the Parishal Employees' Retirement System of Louisiana (the State Plan), a non-employer defined benefit plan.

The Parish Plan covers employees who were hired prior to December 31, 1979. As of that date, the Parish Plan was merged with the State Plan and members of the Parish Plan were treated as members of the State Plan. Employees hired subsequent to the merger of the two systems may participate only in the State Plan.

PLAN DESCRIPTION

THE EMPLOYEES' RETIREMENT SYSTEM OF JEFFERSON PARISH, THE STATE PLAN

Employees who were hired prior to December 31, 1979 participate in both the Parish and State Plans. Benefits for these employees are provided or financed by the State Plan. The benefits provided by the Parish are limited to amounts resulting from the service benefits provided by the two systems. Under the Parish Plan, employees with 30 years of service may retire at age 60, employees with 25 years of service may retire at age 55, and employees with 20 years of service may retire regardless of age. Employees who are members of the Parish Plan, this system (benefits based on 1 percent of the highest three-year average annual compensation plus 2 percent of the first \$2000 of average compensation for each year of service). The benefits for employees who are members of the Parish Plan only, with less than 20 years of service, are reduced to 5 percent per year for each year they receive benefits (below the age of 60). Employees who are members of both the Parish and State Plans receive an amount of 4 percent of the highest three-year average annual compensation for each year of service reduced by any amount paid by the State Plan. The total combined payments of both systems may not exceed 100 percent of the member's final average compensation. Retirement benefits are payable monthly for the life of the retiree, and upon the retiree's death, under certain conditions, are payable to the retiree's surviving spouse and other eligible heirs.

CONSOLIDATED FINANCIAL STATEMENTS AND
NOTES
OF
GENERAL PAPER INDUSTRIES CORPORATION
IN FINANCIAL STATEMENTS (Continued)
DECEMBER 31, 1990

NOTE 8 - PENSION PLANS (Continued)

Periodic Employees' Retirement System of General (The Lease Plan)

Under the Lease Plan, a member is eligible for normal retirement if he has at least 30 years of creditable service regardless of age, or 25 years of creditable service and is at least 55 years old, or 10 years of

creditable service and is at least 50 years old. The monthly retirement benefit is equal to 1 percent of the member's average monthly compensation for any 30 months of consecutive service to which contribution was highest, multiplied by years of creditable service, not to exceed 100 percent of member's final compensation. Retirement benefits are payable monthly for the life of the retiree, and upon the retiree's death, under certain conditions, are payable to the retiree's surviving spouse and minor children.

COVERED PERIOD

The Plan's trial period, as well as the covered period, for each of the plans for the year ended December 31, 1990, were as follows:

	---COVERED---
Lease Plan	\$1,476,026
Lease Plan	17,124,724

CURRENT MEMBERSHIP

Current membership in the single-employer plan (the Lease Plan) is comprised of the following as of December 31, 1990:

	PARTICIPATING MEMBERS
Retirees and beneficiaries currently receiving benefits and terminated employees entitled to benefits but not yet receiving them	814
Active plan participants	---507
Total	<u>1,321</u>

Membership data for the Lease Plan, a non-sharing multiple-employer plan, is not available by individual employer.

Plan's Status and Funding

The amount shown below as the "retiree benefit obligation" is a standardized disclosure measure of the present value of pension benefits, calculated for the effect of projected salary increases, determined to be payable in the future as a result of employee service to date. The measure is the actuarial present value of assumed projected benefits and is included as (1) total assets under the Lease Plan's funding system as a multiple-employer plan, (2)200 assets in special funds for accumulating sufficient assets to pay benefits when due and (3)111 assets for comparisons among public employee retirement plans.

EMERY CORP. PENSION PLAN (CONTINUED)
Jefferson Parish, Louisiana
Notes to Financial Statements (Continued)
December 31, 1996

NOTE 5 - Pension Plans (Continued)

Because the actuarial measurement is used only for disclosure purposes, the measurement is independent of the methods used to determine contributions to the Plan. The pension benefit obligations for the Pension Plan were determined as part of actuarial valuations made as of December 31, 1996. Significant amounts of unamortized loss to determine the actuarial measure of the pension benefit obligations are summarized as follows:

	<u>PENSION PLAN</u>
Loss of return on the investment of present and future assets	\$ 800
Projected salary increases less 1% inflation	5,258
MPW's of mortality	2,762
Administrative benefits increases	Net Favored

The actuarial measure of the pension benefit obligations for the Pension Plan is reported on the FV being as of December 31, 1996.

	<u>PENSION PLAN</u>
Plan for benefit obligations: Short-term and other liabilities currently maturing benefits and vested benefits not yet receiving benefits	\$2,126,740
Current employees: Accumulated unpaid contributions Employee-financed vested Employer-financed unvested	1,476,766 1,214,370 (1,200,000)
Total pension benefit obligation	2,303,506
Net assets available for benefits, as asset or liability with respect to net - \$18,661,000	(18,661,000)
Unfunded pension benefit obligation	<u>\$16,357,494</u>

The Pension Plan, a non-qualified multi-employer plan, does not conduct separate measurements of assets and pension benefit obligations for non-union employees.

	<u>PENSION PLAN</u> <u>AS OF DECEMBER 31, 1996</u>
Total pension benefit obligation	\$2,303,506
Net assets available for benefits	(18,661,000)
Unfunded pension benefit obligation	<u>\$16,357,494</u>

No change in actuarial assumptions or benefit provisions that would significantly affect the valuation of the pension benefit obligations occurred during 1996.

PARISH NORTH MEMBERS PENSION PLAN, 1
Jefferson Parish, Louisiana
Form to Financial Statements, December 31, 1990

NOTE 4 - PENSION PLAN (Continued)

CONTRIBUTION REQUIREMENTS AND RISK

The funding policies of the Parish plan provide for contributions at actuarially determined rates that are sufficient to pay benefits when due. The contribution rates of the Parish Plan are determined using the entry age normal cost method, with the unfunded actuarial accrued liability being funded over a 40 year period. The Parish Council authorizes the contribution rates each year. Significant actuarial assumptions used to compute annual contribution requirements are the same as those used to determine the actuarial measure of the pension benefit obligation.

Contributions required and made for the Parish Plan is reported in the following as of December 31, 1990.

	PARISH PLAN
Contribution required	
Normal cost	\$ 260,781
Amortization of unfunded actuarial accrued liability	696,154
	<u>\$ 956,935</u>
Contributions made	
Employer	\$ 1,200,100
Employee	76,187
	<u>\$ 1,276,287</u>
Contributions made as a percentage of covered payroll	
Employer	5.7%
Employee	1.0%

The contributions of the Parish plan are established by trust trustees. Any additional amounts required to meet the plan's obligations is determined by contributions on a pay-as-you-go basis. For any given year, any shortfall from local and insurance premium funds. It is the intent that the Louisiana Insurance Trustee Act Fund is depleted. The Louisiana Legislative Actuarial Section will increase the Parish's contribution to provide the additional amount required. For 1990, employers and employees were required to contribute into the plan as follows:

	PARISH PLAN
Contributions required and made	
Employer	
Contribution percentage	5.7%
Covered payroll percentage	1.0%
Amount	\$ 4,897,676
Employee	
Contribution percentage	1.0%
Covered payroll percentage	1.0%
Amount	\$ 4,897,688
	<u>\$ 9,795,364</u>

CINCO (C-432) (REVISED) (FORM) NO. 1
 DEFINITION PERIOD, INDICATOR
 Return to Financial Statements (Continued)
 December 31, 1994

NOTE 6 - DEFERRED PLAN STATEMENTS

DEFERRED INFORMATION

Historical trend information for the 1994-employee plan is as follows:

	1994 Trend (\$1,000,000)
Net assets available for benefits as a percentage of the pension benefit obligations:	
1994	54.88
1993	51.31
1992	55.89
Unfunded benefits in excess of pension benefit obligations as a percentage of covered payroll:	
1994	46.36
1993	42.26
1992	54.35
Employer contributions to the pension plan as a percentage of covered payroll:	
1994	4.73
1993	3.79
1992	3.88

Showing the unfunded benefits in excess of pension benefit obligations as a percentage of covered payroll approximately adjusts for the effects of inflation for analytical purposes.

Historical trend information is presented in order for a reader to assess the progress made in accumulating sufficient assets to pay pension benefits as they become due. The year historical trend information is presented in the supplemental information section of this report for the March 31st, two-year historical trend information for the Study Plan is available in the separately issued financial statements beginning January 31, 1994 Supplemental Annual Financial Report.

NOTE 7 - DEFERRED COMPENSATION PLAN

The Parish offers the employees a deferred compensation plan in accordance with Internal Revenue Code Section 457. The plan, which is accounted for as an agency fund in the Parish's comprehensive annual financial report, is available to all Parish employees and permits them to defer a portion of their salary until future years. The deferred compensation is not available to employees until terminated, retirement, death, or unforeseen disability.

All amounts of compensation deferred under the plan, all property and rights purchased with those amounts, and all income attributable to those amounts, property, or rights are jointly paid or made available to the employee or other beneficiaries solely the property and rights of the Parish without being restricted to the provisions

CONSOLIDATED FINANCIAL STATEMENTS OF,
JEFFERSON PARISH, LOUISIANA
Notes to Financial Statements (Continued)
October 31, 1998

NOTE 8 - DEFERRED COMPENSATION PLAN (Continued)

of benefits under the plan), subject only to the claims of the Parish's general creditors. Participants' rights under the plan are equal to those of general creditors of the Parish to the extent equal to the first dollar value of the deferred account for each participant.

The Parish's legal counsel believes that the Parish has no liability for losses under the plan, but does believe the duty of due care that would be required of an ordinary prudent investor. The Parish believes that it is unlikely that it will use the assets to satisfy the claims of general creditors in the future.

Investments are managed by PERSCO. The choice of the investment options is made by the participants.

NOTE 9 - POST-RETIREMENT HEALTH CARE

Health Care and Life Insurance

In addition to providing general benefits, the Parish provides certain health care and life insurance benefits for certain employees as authorized by Resolution No. 30791. Substantially all employees who reach normal retirement age while working for the Parish are eligible. The cost of these benefits are recorded as expenditures when the payments are made. The 1998 health care and life insurance payments for normal employees of the Parish amounted to \$20,000 and \$100,000 for 1998 and 1999, respectively.

Cost of Life Insurance

In addition to the health care and life insurance benefits noted above, the Parish also provides a supplemental life insurance benefit as authorized by Resolution No. 30791. This benefit is available to certain participants in either the Employees' Retirement System of Jefferson Parish or the Parochial Employees' Retirement System of Louisiana who have been retired for at least one year. This additional benefit is paid once a year and is determined as 6% of the monthly benefit times the number of months the person has been retired (initially by partial years). The maximum additional payment is \$200 and the minimum payment is \$1,000. Any additional payment due to the retiree and these retroactive amounts are funded by any cost of living adjustment benefits paid to the parochial employees' retirement system of Louisiana prior available to all plan participants. This additional benefit is funded by the general fund of Jefferson Parish. Thus, there is no liability to the Parish.

NOTE 10 - RISK ADJUSTMENT

The Parish has an annual appropriation, as its governing authority is the Jefferson Parish Council, whose responsibility is restricted to the Parish's comprehensive annual financial reports.

SPECIAL REPORTS ON COMPLETION
PUBLIC LAW 85-562



**INDEPENDENT AUDITORS' REPORT ON INTERNAL CONTROL
STRUCTURE BASED ON AN AUDIT OF FINANCIAL STATEMENTS
PERFORMED IN ACCORDANCE WITH GOVERNMENT AUDITING STANDARDS**

To the Honorable Parish President and
The Honorable Jefferson Parish Council
Jefferson Parish, Louisiana

We have audited the financial statements of Consolidated Sewerage District No. 1 of the Parish of Jefferson, State of Louisiana (the District), for the year ended December 31, 1996 and have issued our report thereon dated April 19, 1997. The financial statements of the District as of December 31, 1995, were audited by other auditors whose report dated April 23, 1996, expressed an unqualified opinion on those statements.

We conducted our work in accordance with generally accepted auditing standards and **Government Auditing Standards**, issued by the Comptroller General of the United States, and the provisions of Office of Management and Budget (OMB) Circular A-135, "Audits of State and Local Governments." These standards and OMB Circular A-135 require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free of material misstatement.

The management of the District is responsible for establishing and maintaining an internal control structure. In fulfilling this responsibility, estimates and judgments by management are required to assess the expected benefits and related costs of internal control structure policies and procedures. The objectives of an internal control structure are to provide management with reasonable, but not absolute, assurance that assets are safeguarded against loss from unauthorized use or disposition, and that transactions are executed in accordance with management's authorizations and recorded properly to permit the preparation of financial statements in accordance with generally accepted accounting principles. Because of inherent limitations in any internal control structure, errors or irregularities may nevertheless occur and not be detected. Also, projection of any evaluation of the structure to future periods is subject to the risk that procedures may become inadequate because of changes in conditions or that the effectiveness of the design and operation of policies and procedures may deteriorate.

In planning and performing our audit of the financial statements of the District for the year ended December 31, 1996, we obtained an understanding of the internal control structure. With respect to the internal control structure, we obtained an understanding of the design of relevant policies and procedures and whether they have been placed in operation, and we assessed control risk in order to determine our auditing procedures for the purpose of expressing our opinion on the financial statements and not to provide an opinion on the internal control structure. Accordingly, we do not express such an opinion.

Our consideration of the internal control structure would not necessarily disclose all matters in the internal control structure that might be material weaknesses under standards established by the American Institute of Certified Public Accountants. A material weakness is a condition in which the design or operation of one or more of the internal control structure elements does not reflect to a relatively low level the risk that errors and irregularities in amounts that would be material in relation to the financial statements being audited may occur and not be detected within a timely period by employees in the normal course of performing their assigned functions. We noted no matters involving the internal control structure and its operation that we consider to be material weaknesses as defined above.

However, we noted certain matters involving the internal control structure and its operation that we have reported to the management of the District. These matters are included in the management letter which accompanies the general purpose financial statements of Jefferson Parish.

This report is intended for the use of management, the Jefferson Parish Council, the U.S. Department of Health and Human Services (the cognizant agency), and the Legislative Auditor of the State of Louisiana. This restriction is not intended to limit the distribution of this report, which is a matter of public record.



Arthur C. Speight & Company

April 18, 1987



LUTHER C. SPEIGHT & COMPANY

A Corporation of Certified Public Accountants
and Management Consultants

June 26, 1997

The Honorable Parish President and
The Honorable Jefferson Parish Council
Jefferson Parish, Louisiana

Dear Members of the Jefferson Parish Council:

In planning and performing our audit of the financial statements of the Consolidated Sewerage District No.1 of the Parish of Jefferson for the year ended December 31, 1996 (on which we have issued our report dated April 10, 1997), we noted the following observation concerning certain matters related to its internal control structure, accounting, administrative, and operating matters.

OBSERVATION:

In performing our audit we noted that a physical inventory of supplies was performed annually; however, there was no year-end reconciliation of the physical inventory count to the perpetual inventory balance.

SUGGESTION:

The Consolidated Sewerage District No.1 should perform a variance analysis between the physical inventory amount and the perpetual inventory amount at year-end. This would identify any unaccountable fluctuations in inventory and provide assurance that the valuation of inventories is appropriate.

This report is intended solely for the information and use of the Jefferson Parish Council, management, and others within the organization.

We will be pleased to discuss this comment with you and, if desired, to assist you in implementing the suggestion.

Yours truly,


Luther C. Speight & Company