# **Terra College Foundation**



**Financial Statements** 

June 30, 2019 and 2018





88 East Broad Street Columbus, Ohio 43215 IPAReport@ohioauditor.gov (800) 282-0370

Board of Trustees Terra College Foundation 2830 Napoleon Road Fremont, Ohio 43420

We have reviewed the *Independent Auditor's Report* of the Terra College Foundation, Sandusky County, prepared by Plattenburg & Associates, Inc., for the audit period July 1, 2018 through June 30, 2019. Based upon this review, we have accepted these reports in lieu of the audit required by Section 117.11, Revised Code. The Auditor of State did not audit the accompanying financial statements and, accordingly, we are unable to express, and do not express an opinion on them.

Our review was made in reference to the applicable sections of legislative criteria, as reflected by the Ohio Constitution, and the Revised Code, policies, procedures and guidelines of the Auditor of State, regulations and grant requirements. The Terra College Foundation is responsible for compliance with these laws and regulations.

Keith Faber Auditor of State Columbus, Ohio

November 5, 2019





#### INDEPENDENT AUDITOR'S REPORT

Board of Trustees Terra College Foundation

#### **Report on the Financial Statements**

We have audited the accompanying financial statements of Terra College Foundation (the Foundation), (a nonprofit organization), a component unit of Terra State Community College, which comprise the statement of financial position as of June 30, 2019 and 2018, and the related statements of activities, and cash flows for the years then ended, and the related notes to the financial statements.

# **Management's Responsibility for the Financial Statements**

Management is responsible for the preparation and fair presentation of these financial statements in accordance with accounting principles generally accepted in the United States of America; this includes 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.

## **Auditor's Responsibility**

Our responsibility is to express an opinion on these financial statements based on our audits. We conducted our audits 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. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free from material misstatement.

An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the financial statements. The procedures selected depend on the auditor's judgment, including the assessment of the risks of material misstatement of the financial statements, whether due to fraud or error. In making those risk assessments, the auditor considers internal control relevant to the entity's preparation and fair presentation of the financial statements 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 entity's internal control. Accordingly, we express no such opinion. An audit also includes evaluating the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluating the overall presentation of the financial statements.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion.

# **Opinion**

In our opinion, the financial statements referred to above present fairly, in all material respects, the financial position of the Foundation as of June 30, 2019 and 2018, and the changes in its net assets and its cash flows for the years then ended in accordance with the accounting principles generally accepted in the United States of America.

#### **Emphasis of Matter**

As discussed in Note 9 to the financial statements, during the year ended June 30, 2019, the Foundation adopted the Financial Accounting Standards Board Update 2016-14 – Not-For-Profit Entities (Topic 958): Presentation of Financial Statements of Not-For-Profit Entities. We did not modify our opinion regarding this matter.

## Other Reporting Required by Government Auditing Standards

In accordance with *Government Auditing Standards*, we have also issued our report dated October 15, 2019, on our consideration of the Foundation's internal control over financial reporting and on our tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements and other matters. The purpose of that report is to describe the scope of our testing of internal control over financial reporting and compliance and the results of that testing, and not to provide an opinion on internal control over financial reporting or on compliance. That report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering the Foundation's internal control over financial reporting and compliance.

Plattenburg & Associates, Inc.
Plattenburg & Associates, Inc.
Cincinnati, Ohio

October 15, 2019



# Terra College Foundation Statements of Financial Position June 30, 2019 and 2018

	<u>2019</u>			2018
Assets				
Cash & cash equivalents	\$	124,530	\$	256,083
Contributions Receivable		860		1,100
Other receivables		69,434		69,434
Investments		6,030,295		5,431,795
Other Assets		-		385
Total assets		6,225,119		5,758,797
Liabilities				
Accounts payable		54,761		69,499
Total liabilities		54,761		69,499
Net assets				
Without Donor Restrictions		266,129		354,366
With Donor Restrictions		5,904,229		5,334,932
Total net assets	\$	6,170,358	\$	5,689,298

See accompanying notes to the financial statements.

# Terra College Foundation Statement of Activities For the Year Ended June 30, 2019

		Without Donor		ith Donor		T-4-1
Developed asing and other comment	<u>Re</u>	strictions	<u>K</u> 6	<u>estrictions</u>		<u>Total</u>
Revenues, gains and other support	Φ.	12.506	ф	<b>5</b> 40.516	Φ.	702.022
Contributions	\$	43,506	\$	748,516	\$	792,022
Grants		-		287,916		287,916
Contributed services and supplies		123,735		-		123,735
Investment return		52,685		185,131		237,816
Net assets released from restrictions		652,266		(652,266)		
Total revenues, gains and other support		872,192		569,297		1,441,489
Expenses						
Program services						
Scholarships and loans		123,477		_		123,477
Instructional equipment		355,115		_		355,115
Other		127,081		-		127,081
Supporting Services						
Management and general		220,869		_		220,869
Fund raising		133,887				133,887
Total expenses		960,429				960,429
Change in net assets		(88,237)		569,297		481,060
Net assets						
Net assets- beginning of year		354,366		5,334,932		5,689,298
Net assets- end of year	\$	266,129	\$	5,904,229	\$	6,170,358

See accompanying notes to the financial statements.

# Terra College Foundation Statement of Activities For the Year Ended June 30, 2018

	Without Donor	W	ith Donor	
	estrictions		estrictions	<u>Total</u>
Revenues, gains and other support				
Contributions	\$ 14,007	\$	246,652	\$ 260,659
Grants	-		-	-
Contributed services and supplies	175,263		-	175,263
Investment return	138,292		194,945	333,237
Net assets released from restrictions	 394,023		(394,023)	 -
Total revenues, gains and other support	721,585		47,574	769,159
Expenses				
Program services				
Scholarships and loans	160,747		-	160,747
Instructional equipment	124,911		-	124,911
Other	89,712		-	89,712
Supporting Services				
Management and general	207,728		-	207,728
Fund raising	 102,591		-	 102,591
Total expenses	 685,689			 685,689
Change in net assets	35,896		47,574	83,470
Net assets				
Net assets- beginning of year	 318,470		5,287,358	 5,605,828
Net assets- end of year	\$ 354,366	\$	5,334,932	\$ 5,689,298

See accompanying notes to the financial statements.

# Terra College Foundation Statements of Cash Flows For The Years Ended June 30, 2019 and 2018

	2019	2018		
CASH FLOWS FROM OPERATING ACTIVITIES				
Increase in net assets	\$ 481,060	\$	83,470	
Adjustments to reconcile increase in net assets to net cash				
from operating activities:				
Unrealized (gain)/loss on investments	105,949		36,722	
Contributions restricted for long-term purposes	(63,621)		(74,179)	
(Increase)/Decrease in accounts receivable	385		500	
(Increase)/Decrease in contributions receivable	240		17,424	
(Increase)/Decrease in other assets	0		4,617	
Increase/(Decrease) in Accounts payable	 (14,737)		69,499	
Net Cash Provided (Used) by Operating Activities	509,276		138,053	
CASH FLOWS FROM INVESTING ACTIVITIES				
Proceeds from sale of long-term investments	115,000		300,000	
Purchase of long-term investments	 (819,450)		(378,260)	
Net Cash Provided (Used) by Investing Activities	(704,450)		(78,260)	
CASH FLOWS FROM FINANCING ACTIVITIES				
Proceeds from contributions restricted for long-term purposes	 63,621		74,179	
Net Cash Provided (Used) by Financing Activities	 63,621		74,179	
Net Increase (Decrease) in Cash and Cash Equivalents	(131,553)		133,972	
Cash and Cash Equivalents, Beginning of the Year	256,083		122,111	
Cash and Cash Equivalents, End of Year	\$ 124,530	\$	256,083	

See the accompanying notes to the financial statements.

Notes to the Financial Statements June 30, 2019 and 2018

# NOTE 1 - SIGNIFICANT ACCOUNTING AND REPORTING POLICIES

<u>Organization</u>: Terra College Foundation (the Foundation) is an Ohio not-for-profit corporation and is a component unit of Terra Community College. The Foundation operates exclusively for the benefit of Terra Community College.

<u>Financial Statement Presentation</u>: The Foundation has adopted the provisions of FASB Accounting Standards Codification (ASC) No. 958 *Not-for-Profit Entities*. Under ASC No. 958 the Foundation is required to report information regarding its financial position and activities according to two classes of net assets as follows:

# **Without Donor Restrictions**

Net assets that are not subject to donor-imposed restrictions (donors include other types of contributors, including makers of certain grants).

#### With Donor Restrictions

Net assets that are subject to donor-imposed restrictions (donors include other types of contributors, including makers of certain grants).

When a donor restriction expires, that is, when a stipulated time restriction expires or purpose restriction is accomplished, net assets with donor restrictions are reclassified to net assets without donor restrictions and reported in the Statement of Activities as net assets released from restrictions.

<u>Cash and Cash Equivalents</u>: For purposes of the statement of cash flows, the Foundation considers all unrestricted highly liquid investments with an initial maturity of three months or less to be cash equivalents.

<u>Contributions</u>: Contributions to the Foundation are recognized and reported as revenue at fair value upon the earlier of the period in which a pledge becomes unconditional or the period in which the contribution is received.

<u>Donated Services and Facilities</u>: The Foundation has no employees. Substantially all clerical, management and fund raising duties are presently performed by employees of Terra Community College, utilizing equipment and facilities of Terra Community College. The value of services provided, in the amount of \$123,735 and \$175,263 for the years ended June 30, 2019 and 2018 has been recognized in the statement of activities.

<u>Investments</u>: Investments are valued at fair value, which is generally determined by use of published market quotations. Realized gains or losses from sale or redemption of investments are based on the cost of the specific investment sold or redeemed. Purchases and sales of investments are reflected on a trade-date basis.

<u>Income Tax Status</u>: The Foundation is exempt from federal income tax as an organization described in Section 501(c)(3) of the Internal Revenue Code.

<u>Use of Estimates</u>: The preparation of financial statements in conformity with accounting principles generally accepted in the United States of America requires management to make estimates and assumptions that affect amounts reported in the financial statements and accompanying notes. Actual results could differ from those estimates.

Notes to the Financial Statements June 30, 2019 and 2018

# NOTE 1 - SIGNIFICANT ACCOUNTING AND REPORTING POLICIES (Continued)

<u>Concentration of Credit Risk</u>: The Federal Deposit Insurance Corporation insures financial institution depositors up to \$250,000. At times, the Foundation maintains deposits exceeding \$250,000 in a financial institution.

<u>Reclassifications:</u> Certain prior year amounts have been reclassified to conform to the current year presentation.

# NOTE 2 - NET ASSETS WITH DONOR RESTRICTIONS

Net assets with donor restrictions are available for the following purposes or periods:

	2019	2018
Time/Purpose Restricted - Terra Community College Support	\$ 3,075,132	\$ 2,569,456
Donor Restricted Endowment	2,829,097	2,765,476
Total	\$ 5,904,229	\$ 5,334,932

#### Donor-Restricted Endowment Fund

The Foundation's endowment fund was established to support Terra Community College. The contributions to the endowment fund contain donor restrictions that stipulate the original principal is to be held and invested by the Foundation indefinitely, and income from the fund is to be expended for support. As required by generally accepted accounting principles, net assets associated with the endowment fund are classified and reported based on the existence of donor imposed restrictions.

Interpretation of UPMIFA: The Foundation has interpreted the Uniform Prudent Management of Institutional Funds Act ("UPMIFA") as requiring the preservation of the fair value of the original gift as of the gift date of the donor-restricted endowment funds absent explicit donor stipulations to the contrary.

As a result of this interpretation, the Foundation classifies as perpetual in nature (a) the original value of gifts donated to the permanent endowment, (b) the original value of subsequent gifts to the permanent endowment, and (c) accumulations to the permanent endowment made in accordance with the direction of the applicable donor gift instrument at the time the accumulation is added to the fund. The remaining portion of the donor-restricted endowment fund that is not classified as perpetual in nature is classified as purpose or time restricted until those amounts are appropriated for expenditure by the Foundation in a manner consistent with the standard of prudence prescribed by UPMIFA.

In accordance with UPMIFA, the Foundation considers the following factors in making a determination to appropriate or accumulate donor-restricted endowment funds:

- a. The duration and preservation of the fund
- b. The purposes of the organization and the donor-restricted endowment fund
- c. General economic conditions
- d. The possible effect of inflation and deflation
- e. The expected total return from income and the appreciation of investments
- f. Other resources of the organization
- g. The investment policies of the organization

Notes to the Financial Statements June 30, 2019 and 2018

## NOTE 2 - NET ASSETS WITH DONOR RESTRICTIONS (Continued)

Funds with Deficiencies: From time to time, the fair value of assets associated with individual donor restricted endowment funds may fall below the level that the donor or UPMIFA requires the Foundation to retain as a fund of perpetual duration. The Foundation had no such deficiencies as of June 30, 2019 and June 30, 2018.

The changes in endowment net assets for the years ending June 30, 2019 and 2018 are as follows:

	2019	2018			
Endowment net assets, Beginning of Year	\$ 2,765,476	\$	2,691,297		
Contributions	63,621		74,179		
Investment return net	185,131		194,945		
Amounts appropriated for expenditure	 (185,131)		(194,945)		
Endowment net assets, End of Year	\$ 2,829,097	\$	2,765,476		

#### **NOTE 3 - INVESTMENTS**

The Foundation determines the fair market values of its financial instruments based on the fair value hierarchy established in FASB Accounting Standards Codification (ASC) No. 820 Fair Value Measurement, which requires an entity to maximize the use of observable inputs and minimize the use of unobservable inputs when measuring fair value. Observable inputs are inputs that reflect the assumptions market participants would use in pricing the asset or liability developed based on market data obtained from sources independent of the reporting entity. Unobservable inputs are inputs that reflect the Foundation's own assumptions based on market data and on assumptions that market participants would use in pricing the asset or liability developed based on the best information available in the circumstances. The Standard describes three levels within its hierarchy that may be used to measure fair value:

Level 1 Inputs: Quoted prices (unadjusted) for identical assets or liabilities in active markets that the entity has the ability to access as of the measurement date.

Level 2 Inputs: Significant other observable inputs other than Level 1 quoted prices such as quoted prices for similar assets or liabilities; quoted prices in markets that are not active; or other inputs that are observable or can be corroborated by observable market data.

Level 3 Inputs: Significant unobservable inputs that reflect a reporting entity's own assumptions about the assumptions that market participants would rise in pricing an asset or liability.

Notes to the Financial Statements June 30, 2019 and 2018

# **NOTE 3 – INVESTMENTS (Continued)**

The fair value of investments held by the Foundation at June 30, 2019 are summarized as follows:

	Quoted Prices In Active Markets For Identical Assets (Level 1)	Significant Other Observ- able Inputs (Level 2)	Significant Unobservable Inputs (Level 3)
Money market funds	\$ 879,410	\$-0-	\$-0-
Debt Securities	1,454,829	-0-	-0-
Equity Securities	<u>3,696,056</u>	<u>-0-</u>	<u>-0-</u>
Total	<u>\$ 6,030,295</u>	<u>\$-0-</u>	<u>\$-0-</u>

The fair value of investments held by the Foundation at June 30, 2018 are summarized as follows:

	Quoted Prices In Active Markets For Identical Assets (Level 1)	Significant Other Observ- able Inputs (Level 2)	Significant Unobservable Inputs (Level 3)
Money market funds	\$ 260,479	\$-0-	\$-0-
Debt Securities	1,415,191	-0-	-0-
Equity Securities	<u>3,756,125</u>	<u>-0-</u>	<u>-0-</u>
Total	<u>\$ 5,431,795</u>	<u>\$-0-</u>	<u>\$-0-</u>

# NOTE 4 - CONTRIBUTIONS RECEIVABLE

Contributions receivable at June 30, 2019 and 2018 are promises to give from various donors that are unconditional and are summarized as follows:

	2019	2018
Unconditional promises expected to be collected in:		
Less than one year	\$860	\$1,100
One year to five years	0	0
Over five years	0	0
	860	1,100
Less:		
Unamortized discount and allowance for doubtful pledges	0	0
	\$860	\$1,100

# NOTE 5 - SUPPORT TO TERRA COMMUNITY COLLEGE

During the years ended June 30, 2019 and 2018, the Foundation made contributions of approximately \$605,673 and \$375,370 to or on behalf of the College for both restricted and unrestricted purposes.

Notes to the Financial Statements June 30, 2019 and 2018

# **NOTE 6 – EXPENSE DISCLOSURES**

							<u>2019</u>								
			Sı												
	Scholarships and Loans		Instructional Equipment		Other		Program Total		Management and General		Fund- Raising	Supporting Total		Total Expenses	
Terra Community College Support	\$	123,477	\$	355,115	\$ -	\$	478,592	\$	-	\$	-	\$	-	\$	478,592
Wages and Benefits		-		-	107,753		107,753		-		-		-		107,753
Services and Professional Fees		-		-	5,500		5,500		140,914		96,746		237,660		243,160
Advertising Fees		-		-	10,118		10,118		3,196		508		3,704		13,822
Supplies, Printing, and Postage		-		-	3,710		3,710		21,719		32,487		54,206		57,916
Staff Development		-		-	-		-		5,778		4,146		9,924		9,924
Insurance		-		-	-		-		28,425		-		28,425		28,425
Software Licenses and Support		-		-	-		-		7,688		-		7,688		7,688
Depreciation		-		-	-		-		385		-		385		385
Misc Expense		-		-	-		-		12,764		-		12,764		12,764
Total Expenses	\$	123,477	\$	355,115	\$ 127,081	\$	605,673	\$	220,869	\$	133,887	\$	354,756	\$	960,429

								<u>2018</u>									
	Program Activities										Supporting Activities						
		Scholarships and Loans		Instructional Equipment		Other		Program Total		Management and General		Fund- Raising	Supporting Total		Total Expenses		
Terra Community College Support	\$	160,747	\$	124,911	\$	37,399	\$	323,057	\$	-	\$	-	\$	-	\$	323,057	
Wages and Benefits		-		-		-		-		-		-		-		-	
Services and Professional Fees		-		-		24,935		24,935		166,244		89,938		256,182		281,117	
Advertising Fees		-		-		2,933		2,933		2,442		1,286		3,728		6,661	
Supplies, Printing, and Postage		-		-		14,775		14,775		28,999		5,521		34,520		49,295	
Staff Development		-		-		9,670		9,670		2,352		124		2,476		12,146	
Insurance		-		-		-		-		-		-		-		-	
Software Licenses and Support		-		-		-		-		-		-		-		-	
Depreciation		-		-		-		-		4,618		-		4,618		4,618	
Misc Expense				-		-		-		3,073		5,722		8,795		8,795	
Total Expenses	\$	160,747	\$	124,911	\$	89,712	\$	375,370	\$	207,728	\$	102,591	\$	310,319	\$	685,689	

Some categories of expense are attributable to more than one activity and require allocation, applied on a consistent basis.

Wages and benefits are allocated on the basis of employee duties.

Other expenses are assigned directly to specific activities as expenditures are made.

Notes to the Financial Statements June 30, 2019 and 2018

#### NOTE 7 - LIQUIDITY AND AVAILABILITY OF FINANCIAL ASSETS

The following reflect the Foundation's financial assets as of the date of the Statement of Financial Position, reduced by amounts not available for general use because of contractual or donor-imposed restrictions within one year of the financial statement date.

	2019		2018	
Cash and Cash Equivalents	\$ 124,530	\$	256,083	
Investments	6,030,295		5,431,795	
Receivables	70,294		70,534	
	6,225,119		5,758,412	
Less amounts unavailable for general expenditures within one year, due to:				
Donor-restricted purpose or time	3,075,132		2,569,456	
Donor-restricted to maintain as an endowment	2,829,097		2,765,476	
Financial assets available to meet cash needs for general expenditures within one year	\$ 320,890	\$	423,480	

As part of the Foundation's liquidity management, the Foundation invests cash in excess of requirements in various types of investments.

#### **NOTE 8 - SUBSEQUENT EVENTS**

The Foundation has evaluated events occurring between the end of its most recent fiscal year and October 15, 2019, the date the financial statements were issued. No material subsequent events were identified for recognition or disclosure.

#### NOTE 9 - NEW ACCOUNTING PRINCIPLE

The Foundation has adopted new accounting guidance, FASB ASU 2016-14, **Not-for-Profit Entities** (Topic 958): **Presentation of Financial Statements of Not-for-Profit Entities**. This guidance required changes to the presentation of categories of net assets and required certain new disclosures. The new accounting principle was implemented retrospectively; changes to the previously issued 2018 financial statement amounts, including net assets, were not material.

# **Terra College Foundation**



# **Yellow Book Report**

June 30, 2019







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

Board of Trustees Terra College Foundation

We have audited, in accordance with the auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards* issued by the Comptroller General of the United States, the financial statements of the Terra College Foundation (the Foundation), (a nonprofit organization), a component unit of Terra State Community College, which comprise the statement of financial position as of June 30, 2019, and the related statements of activities, and cash flows for the year then ended, and the related notes to the financial statements, and have issued our report thereon dated October 15, 2019, wherein we noted the Foundation adopted ASU 2016-14 as disclosed in Note 9.

#### **Internal Control over Financial Reporting**

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

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

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

#### **Compliance and Other Matters**

As part of obtaining reasonable assurance about whether the Foundation's financial statements are free from material misstatement, we performed tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements, noncompliance with which could have a direct and material effect on the determination of financial statement amounts. However, providing an opinion on compliance with those provisions was not an objective of our audit, and accordingly, we do not express such an opinion. The results of our tests disclosed 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.

Plattenburg & Associates, Inc.

Plattenburg & Associates, Inc.

Cincinnati, Ohio October 15, 2019





# TERRA COMMUNITY COLLEGE FOUNDATION

#### **SANDUSKY COUNTY**

# **CLERK'S CERTIFICATION**

This is a true and correct copy of the report which is required to be filed in the Office of the Auditor of State pursuant to Section 117.26, Revised Code, and which is filed in Columbus, Ohio.

**CLERK OF THE BUREAU** 

Susan Babbitt

CERTIFIED NOVEMBER 19, 2019