STATE OF
NORTH CAROLINA

PERFORMANCE AUDIT

DEPARTMENT OF COMMERCE

JOB DEVELOPMENT INVESTMENT GRANT (JDIG) PROGRAM

JULY 2013

OFFICE OF THE STATE AUDITOR

BETH A. WOOD, CPA

STATE AUDITOR

EXECUTIVE SUMMARY

PURPOSE

This audit report evaluates whether the project selection and payment processes for the Job Development Investment Grant Program (JDIG) are consistently applied and use complete and accurate information.

BACKGROUND

The JDIG Program is a performance-based economic development incentive program and is the largest economic development grant program administered by the Department of Commerce (Department). The Economic Investment Committee (Committee) oversees the JDIG Program. Since its inception in 2003 and through March 2012, the Committee has awarded 145 grants totaling $600 million.

KEY FINDINGS

- Incorrect grant payments may occur because job creation information is not independently confirmed by the State.
- Information about some potential projects is not provided to the Committee.
- Measureable criteria are needed to determine grant award amounts.

KEY RECOMMENDATIONS

- The Department should confirm the accuracy of company data used to compute grant payments.
- Potential projects removed from consideration by Department staff should be provided to the Committee.
- The Committee should develop, and the Department should use, measurable criteria to determine grant award amounts.

Key findings and key recommendations do not include all findings and recommendations in this report.

STATE OF NORTH CAROLINA
Office of the State Auditor

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July 29, 2013

The Honorable Pat McCrory, Governor
Members of the North Carolina General Assembly
Ms. Sharon Decker, Secretary, Department of Commerce

Ladies and Gentlemen:

We are pleased to submit this performance audit titled "*Department of Commerce - Job Development Investment Grant (JDIG) Program*." The audit objectives were to determine (1) whether the grant payment process ensures the use of complete and accurate information; (2) whether projects are reviewed by the statutorily designated authority; and (3) whether grant award amounts are based on measureable criteria.

Secretary Decker reviewed a draft copy of this report. Her written comments are included in the appendix.

The Office of the State Auditor initiated this audit to evaluate the effectiveness of the JDIG Program.

We wish to express our appreciation to the staff of the Department of Commerce for the courtesy, cooperation, and assistance provided us during the audit.

Sincerely,

Beth A. Wood

Beth A. Wood, CPA
State Auditor

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INTRODUCTION

BACKGROUND

The Job Development Investment Grant (JDIG) Program is a performance-based economic development incentive program and is the largest economic development grant program administered by the Department of Commerce (Department). The JDIG Program became effective January 2003 and is currently scheduled to sunset on January 1, 2016.

The primary purposes of the JDIG Program are to:

- Create new jobs.
- Enlarge the overall tax base.
- Expand and diversify the State's industrial base.
- Increase revenues to the State and its political subdivisions.[1]

The JDIG Program is overseen by the Economic Investment Committee (Committee).[2] The Committee is authorized to award up to 25 grants in a single grant year, with total obligations not to exceed $180 million over the grant term for any one grant.[3] Each grant may provide annual payments for a period of up to 12 years. Grant awards are based on a percentage of withholding taxes paid by new employees during each calendar year of the grant. The percentage of withholdings ranges from 10% to 75%.

Since its inception in 2003 through March 2012, the Committee awarded 145 grants with awards totaling $600 million.[4] In 2011, the Committee awarded 22 grants totaling $100.9 million, which are expected to generate 4,970 new jobs and retain 6,624 jobs in North Carolina. In addition, these 2011 grantees, according to the Department, are expected to make investments in the State of more than $780 million over the grant term.

OBJECTIVES, SCOPE, AND METHODOLOGY

The audit objectives were to determine whether the grant payment process ensures the use of complete and accurate information, whether projects are reviewed by the statutorily designated authority, and whether grant award amounts are based on measureable criteria.

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[1] As specified in *North Carolina General Statute* G.S. 143B-437.50(4).

[2] Five members serve on this committee – the state's Secretary of Commerce, the Secretary of Revenue, the Director of the Office of State Budget and Management, and two private sector members appointed by the North Carolina General Assembly.

[3] The total amount paid out for a project in any single grant year cannot exceed $15 million. Since 2007, the maximum number of grants awarded in any one year has been less than 25. In 2012, the Legislature removed the requirement limiting to 25 the total annual number of grant awards.

[4] The Department does not expect to pay this amount because actual performance will not meet initial estimates. Currently, the estimated payments based on expected performance total $490 million through 2026. Actual payments are based on the actual number of positions created and the amount of the project investment. Companies may receive a reduced grant payment when the number of new positions or investment amount is below the level identified in the grant award, but still exceed the minimum established level.

The Office of the State Auditor initiated this audit to evaluate the effectiveness of the JDIG Program.

The audit scope included an evaluation of the JDIG Program grant determination and payment processes initiated in 2011.

To achieve the audit objective, we reviewed state laws and regulations, and interviewed Department of Commerce staff. We collected and analyzed documents associated with the grant eligibility determination and payment processes. We also reviewed other government economic incentive programs.

Because of the test nature and other inherent limitations of an audit, together with limitations of any system of internal and management controls, this audit would not necessarily disclose all performance weaknesses or lack of compliance.

As a basis for evaluating internal control, we applied the internal control guidance contained in professional auditing standards. As discussed in the standards, internal control consists of five interrelated components, which are (1) control environment, (2) risk assessment, (3) control activities, (4) information and communication, and (5) monitoring.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

We conducted this audit under the authority vested in the State Auditor of North Carolina by *North Carolina General Statute* 147.64.

1. ELIGIBLE POSITIONS IDENTIFIED BY COMPANIES ARE NOT VERIFIED

For the 2010 grant year, with payments scheduled for 2011, the Department of Commerce (Department) made Job Development Investment Grant (JDIG) Program payments totaling $20 million for 35 grant projects without independently confirming the accuracy of information used to calculate grant payment amounts. Specifically, the Department did not perform audits or onsite visits to confirm that grant recipients created eligible positions and made capital investments in accordance with the grant agreement.

Grant payment amounts are based on the associated state income tax withholdings of eligible positions. For a position to be eligible, it must be created after the grant award date and be located at the associated project location. Transferred positions from another in-state project are not considered eligible.

Additionally, companies must comply with capital investment requirements to receive grant payments. The grant investment requirement is one of the factors considered in the determination of whether the project will achieve its intended objective of enlarging the state's overall tax base and increasing revenues to the State and its political subdivisions.[5]

The Department performs some procedures to ensure the accuracy of grant payments. For example, the Department uses withholding records from the Department of Revenue to confirm the accuracy of the wage and tax information reported by companies. The Department requires companies to submit annual reports documenting eligible positions and capital assets. The Department also requires companies to certify that the reports are accurate.

However, the Department does not independently confirm that the positions are eligible for grant payments or that grant investment requirements were met as recommended by best practices. For example, "Best Practices in Carrying Out Economic Development Efforts" published by the National State Auditors Association states,

> "The economic development agency should develop and follow systematic, **objective**, and **independent** processes for determining whether service recipients are complying with all requirements to ensure that the program is being carried out as intended and to help ensure that tax dollars are being spent wisely and are achieving the desired results." (*Emphasis added*)

Relying on a company that is receiving grant payments to confirm that the company is in compliance with the grant requirements does not meet the definition of an objective and independent process.

Without independent confirmation of a grant recipient's self-reported data, the State could make grant payments to noncompliant companies. The lack of independent confirmation could also cause the State to inaccurately evaluate the effectiveness of the JDIG Program, the

[5] *North Carolina General Statutes* 143B-437.56(a)(5) and 143B-437.50(4)

purpose of which is "to stimulate economic activity and **create new jobs** in the State."[6] (*Emphasis added*)

Consequently, additional procedures may be necessary to confirm grantee compliance and program effectiveness. For example, "Best Practices in Carrying Out Economic Development Efforts" also says,

> "Depending on the nature of the program, some verification work might also be performed through on-site reviews or independent (reviews or) audits."

The Department does not consider audits feasible or necessary to confirm the accuracy of information used to calculate millions of dollars of grant payment amounts. Department personnel wrote,

> "The Department does not believe the program contemplated or was funded for onsite audits of this nature, although the legal right to conduct audits does exist. The Department believes that sufficient protections exist in the program to obtain a high level of confidence in the reliability of the grantee annual reporting, the payment calculation process, and the cost-benefit analysis, and that the type of audits contemplated are not feasible or desirable."

However, without audits or other objective and independent means of confirmation, the Department may not identify grantee noncompliance in a timely way and apply the remedies required by statute. For example, state law says,

> "If the business receiving a grant fails to meet or comply with any condition or requirement set forth in an agreement or with criteria developed by the Committee in consultation with the Attorney General, the Committee **shall** reduce the amount of the grant or the term of the agreement, may terminate the agreement, or both. The reduction in the amount or the term **must**, at a minimum, be proportional to the failure to comply measured relative to the condition or criterion with respect to which the failure occurred."[7] (*Emphasis added*)

The Department relies on companies that receive grant payments to self-report compliance with the grant agreement. However, a company is not likely to self-report its noncompliance with the grant agreement. Therefore, the Department is not likely to identify noncompliance and implement the required statutory remedy in a timely way.

***Recommendation*:** In accordance with best practices, the Department should establish objective and independent processes for determining whether grant recipients are complying with all grant requirements.

Agency Response: First, it is important for the taxpayers of North Carolina to know that we now require companies to formally attest to the veracity of the information they provide to us and ultimately to the NC Department of Revenue in order to meet either the eligible position

[6] *North Carolina General Statute* 143B-437.50(5)
[7] *North Carolina General Statute* 143B-437.59(a)

or capital investment requirements. This is a legally binding affirmation and not one that companies take lightly.

However, based on your recommendations from "Best Practices in Carrying Out Economic Development Efforts," published by the National State Auditors Association and discussed in our exit interview with you and your staff, we understand that your main concern rests with developing a process for independently verifying capital investments for all grant recipients and the eligibility of positions from grant recipients that already have facilities and employees in North Carolina. Your goal is to ensure that all investments claimed are in fact made and that all positions identified as "new" are actually newly created and not transfers from an existing NC facility in addition to the affirmations we now require.

This brings me to the second part of my response. I believe that, before adding an additional layer of confirmation, we should conduct a comprehensive review of possible solutions. I am asking our team, led by the Commerce Finance Director and our General Counsel, to review best practices in other states with similar discretionary incentives, to fully explore the data currently available via state agencies that would meet this third-party verification standard and to develop recommendations on how we might adjust our processes, given our Department's resources. We will discuss these possible solutions with you and your staff no later than November 15, 2013, and look forward to finding a method that meets the intent of your recommendation, makes use of information readily reported and/or available within government agencies and follows the federal and state confidentiality requirements when dealing with such information.

2. COMMITTEE NOT PRESENTED ALL POTENTIAL JDIG PROJECTS PREPARED BY STAFF

In 2011, Business and Industry developers in the Business and Industry Division with the Department of Commerce prepared 65 briefing memos for JDIG projects. The Economic Investment Committee (Committee) allows the Department's senior staff to determine whether these projects are viable JDIG grant projects. Only viable projects determined by senior staff are submitted to the Committee. Only 18 of these 65 projects were presented to the Committee for award consideration.

Senior staff removed 25 of the 65 projects after the Department and the companies seeking grants exchanged information regarding potential grant amounts, economic impact, and project characteristics. Senior staff removed 22 additional projects from consideration without the benefit of a grant award determination or an evaluation of the project's impact on the State.

The Department did not have written documentation identifying the rationale for its decision to remove any of the 47 projects from consideration for a JDIG grant. However, based on the recollection of the Department's Business and Industry Division Manager and the Commerce Finance Center Director, projects were removed from the grant process for some of the following reasons:

- The company withdrew from the process because it was no longer pursuing the project, or it elected not to locate the project in North Carolina;
- The Department determined that the project was not a good JDIG candidate, and/or other economics incentive programs were better options.

As specified in state law,[8] the Committee is responsible for administering the JDIG Program. To facilitate this responsibility, the Committee should be aware of all potential projects evaluated by the Department's senior staff.

Additionally, the Department does not have a formalized process of notifying a company when the company's project is no longer under consideration for a JDIG grant by the Department.

Recommendation: The Department should:

- Document the results of senior staff evaluations of briefing memos.
- Provide the Committee a summary of potential JDIG projects that did not materialize and the reason(s) they were removed by senior staff. This would include those projects where information was exchanged regarding grant amounts, economic impact, and project characteristics, and, as such, would not include every project in briefing memos.
- Provide the company with a letter or some other form of written communication stating the reason(s) their project was removed from consideration for a JDIG grant.

Agency Response: The Secretary of Commerce and the Department itself are tasked with determining which, if any, potential projects are appropriate for the JDIG program or any other program. Sections 4.1 and 4.4 of the duly adopted Governing Criteria task the Department with administering the "solicitation, receipt, and screening of [JDIG] applications" and "such other responsibilities as the Committee may request and the Secretary of Commerce my direct." Under Section 4.1 of the Governing Criteria, the Secretary is expected to discuss benefits of the program with companies that are promising candidates and may express support for a particular project, and report to the EIC only on economic development projects for which the program has been promoted.

There are a variety of reasons why economic development projects that may initially seem like JDIG candidates never make it to the level of Committee consideration, and they include the fact that some companies remove themselves from consideration by locating in another state, by simply discontinuing the pursuit of a planned expansion or move, or by failing to meet the competitive standard, meaning that North Carolina is in competition with another state or nation for the project.

Secondly, the Department staff, charged with helping the EIC conduct its review and awards, evaluates each potential candidate on the statutory requirements mentioned earlier. If a project does not meet those criteria, it is not submitted for the Committee's consideration. This is in keeping not only with the Governing Criteria but also with any sound business

[8] *North Carolina General Statute* 143B-437.52(a)

process: gather needed information for a decision, work within an established set of parameters, eliminate candidates that don't fit within those parameters and consider the ones that do. However, we are confident that the newly constructed model outlined in our response to the earlier recommendation will allow our team to have a clear, objective basis approved by the EIC for including or excluding potential candidates. Once those basic parameters are approved, we will provide a list of projects quarterly that fall within the agreed guidelines but were not presented for consideration, as well as the rationale for not being presented. This new process will provide a more detailed context for how projects are selected for review and consideration without requiring a full-scale application and increased demand on limited staff resources. **Once the new model is fully employed in the first quarter of FY 2013-14, our Commerce Finance Director and his team will develop the list on a quarterly basis for the committee's review.**

3. MEASURABLE CRITERIA NEEDED FOR DETERMINING GRANT AWARD AMOUNTS

Grant award offers, and any increases offered are made, according to the Department of Commerce (Department), based on its determination of what is necessary to "win a project." The Department reported that the grant amount is based on statutory factors,[9] prior grant amounts for comparable projects, and other offers the company is considering. This determination is qualitative in nature and some measurable criteria are needed.

The Economic Investment Committee (Committee) has not developed quantitative measures by which to consistently determine award amounts using the measurable statutory factors. As a result, the final grant awarded a company, (1) may differ significantly from previous offers without a significant change in need and measurable benefits to the State, and (2) may not be commensurate with an award offered to another company for the same or similar need and measurable benefits to the state.

The amount of an awarded grant is a percentage of withholding taxes between 10% and 75% and based on the number of eligible positions the project will create. The percentage of withholdings shall be based on criteria developed by the Committee in consultation with the Attorney General after considering at least the following statutory factors:[10]

1. The number of eligible positions to be created.
2. The expected duration of those positions.
3. The type of contribution the business can make to the long-term growth of the State's economy.
4. The amount of other financial assistance the project will receive from the State or local governments.
5. The total dollar investment the business is making in the project.
6. Whether the project utilizes existing infrastructure and resources in the community.
7. Whether the project is located in a development zone.

[9] *North Carolina General Statute 143B-437.56(a)*
[10] *North Carolina General Statute 143B-437.56(a)*

8. The number of eligible positions that would be filled by residents of a development zone.
9. The extent to which the project will mitigate unemployment in the State and locality.

Without using a grant determination methodology that applies quantitative measures, there are no assurances that grant amounts are determined consistently based on the measurable statutory factors associated with achievement of JDIG Program objectives.

Recommendation: To ensure achievement of the JDIG Program's objectives, the Economic Investment Committee should develop a matrix based on quantitative measures and authorize the Department to use this matrix to weight the statutory defined factors.

Agency Response: My team and I concur that we could improve the formula that determines the JDIG award amounts presented for consideration to the Economic Investment Committee (the "EIC" or the "Committee"), which oversees and approves the JDIG grants. In addition to the duly adopted JDIG Criteria for Operation and Implementation (the "governing Criteria") that outlines for the EIC the consideration of criteria included in the General Statutes for each potential JDIG grantee, our team has developed a model that will assist in establishing clear parameters, also based on the statutory requirements, leading to grant monetary ranges for potential awardees. This model has been tested on some past and current JDIG grantees and has provided consistent, objective results. **Our commerce Finance Director and his team will be outlining and demonstrating this model to the EIC prior to August 15, 2013. We look forward to getting the committee's feedback and to fully implementing the model during the first quarter of the new fiscal year without additional cost to the Department or the program**.

In summary, our Department found value in this performance audit, the staff interactions, and the issues put forth requiring further examination, and I am committed to retaining the public confidence that state and corporate leaders, as well as North Carolina taxpayers, have in our JDIG program and processes. Our team has already taken steps to address two of your staff's recommendations with full implementation expected by August 15, 20143, and we will have a more complete response to the third recommendation by November 15, 2013.

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North Carolina
Department of Commerce

Pat McCrory, Governor   Sharon Allred Decker, Secretary

July 15, 2013

The Honorable Beth Wood
State Auditor
2 South Salisbury St.
Raleigh, NC 27699

Dear State Auditor Wood:

I provide this letter as a written response to the State Auditor's Performance Audit of the Job Development Investment Grant (JDIG) Program. Having held the role of Secretary of the North Carolina Department of Commerce (the "Department" or "Commerce") now for six months, this audit offered the opportunity for our team to thoroughly examine each process associated with the JDIG program, and I thank you for your work in undertaking a comprehensive performance review. As in most cases with this type of review, we found areas of agreement with your recommendations and some areas of differences. However, each step in this process has been helpful in either confirming the positive steps we take or in providing the chance for reconsideration of others. JDIG remains our State's most powerful and consistent performance-based incentive in our ongoing efforts to bring net job growth to North Carolina, and as a new Secretary, I welcome the opportunity to make it even stronger.

Since its beginning in 2003, the JDIG program has provided 178 grants to companies pledging 63,635 jobs and $10.5 billion in investment to North Carolina. However, since these grants are performance-based – only delivering the promised incentives when companies hold up their end of the job-creation and capital investment promises – nearly 31 percent of our JDIG recipients have chosen to discontinue their participation in the program and have not taken full advantage of their awards. Yet, even among those companies that continue to receive yearly payments throughout their grant lifecycle, very few actually receive all the funds for which they are eligible. For example, in 2011, grant recipients were eligible to receive $28.7 million in payments but only actually received $18 million. Over the history of the program, North Carolina has distributed $116.4 million in grant payments while those same companies have paid $305.8 million in just NC withholding taxes. This figure does not include any other taxes paid to state or local entities nor does it include withholding paid for any employees outside the scope of the grant agreements. I think these are important facts that often get lost in the debate surrounding incentives.

Additionally, JDIG agreements for companies locating in the urban centers of our state have contributed $5.4 million in 2011 toward the Utility Fund, into which 25 percent of every urban-based

JDIG agreement goes to support economic development infrastructure in rural communities. The success of this program has been dramatic when deployed as envisioned; however, in recent years, some of these dollars have been removed to fill budget deficits, decreasing the impact of this critical tool for our state's rural areas. I am committed to working with our state leaders to ensure that these funds remain intact and are dispersed in a timely, thoughtful manner to our rural areas.

Recommendation Responses

In your review of JDIG, you offered three recommendations. I would like to provide a response to each beginning with the **recommendation focused on the development of measurable criteria to determine grant award amounts**. My team and I concur that we could improve the formula that determines the JDIG award amounts presented for consideration to the Economic Investment Committee (the "EIC" or the "Committee"), which oversees and approves the JDIG grants. In addition to the duly adopted JDIG Criteria for Operation and Implementation (the "Governing Criteria") that outlines for the EIC the consideration of criteria included in the General Statues for each potential JDIG grantee, our team has developed a model that will assist in establishing clear parameters, also based on the statutory requirements, leading to grant monetary ranges for potential awardees. This model has been tested on some past and current JDIG grantees and has provided consistent, objective results. **Our Commerce Finance Director and his team will be outlining and demonstrating this model to the EIC prior to August 15, 2013. We look forward to getting the Committee's feedback and to fully implementing the model during the first quarter of the new fiscal year without additional cost to the Department or the program.**

Your **second recommendation concerned the level of information provided to the Committee regarding potential JDIG projects**, as you state in your findings that only 18 of 65 potential JDIG recipients, in 2010, were actually presented to the EIC for its consideration. The Secretary of Commerce and the Department itself are tasked with determining which, if any, potential projects are appropriate for the JDIG program or any other program. Sections 4.1 and 4.4 of the duly adopted Governing Criteria task the Department with administering the "solicitation, receipt, and screening of [JDIG] applications" and "such other responsibilities as the Committee may request and the Secretary of Commerce may direct." Under Section 4.1 of the Governing Criteria, the Secretary is expected to discuss benefits of the program with companies that are promising candidates and may express support for a particular project, and report to the EIC only on economic development projects for which the program has been promoted.

There are a variety of reasons why economic development projects that may initially seem like JDIG candidates never make it to the level of Committee consideration, and they include the fact that some companies remove themselves from consideration by locating in another state, by simply discontinuing the pursuit of a planned expansion or move, or by failing to meet the competitive standard, meaning that North Carolina is in competition with another state or nation for the project.

Secondly, the Department staff, charged with helping the EIC conduct its review and awards, evaluates each potential candidate on the statutory requirements mentioned earlier. If a project does not meet those criteria, it is not submitted for the Committee's consideration. This is in keeping not only with the Governing Criteria but also with any sound business process: gather needed information for a decision, work within an established set of parameters, eliminate candidates that don't fit within those parameters

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and consider the ones that do. However, we are confident that the newly constructed model outlined in our response to the earlier recommendation will allow our team to have a clear, objective basis approved by the EIC for including or excluding potential candidates. Once those basic parameters are approved, we will provide a list of projects quarterly that fall within the agreed guidelines but were not presented for consideration, as well as the rationale for not being presented. This new process will provide a more detailed context for how projects are selected for review and consideration without requiring a full-scale application and increased demand on limited staff resources. **Once the new model is fully employed in the first quarter of FY 2013-14, our Commerce Finance Director and his team will develop the list on a quarterly basis for the committee's review.**

Finally, regarding your third recommendation on verification of both positions and capital investments that go toward meeting companies' JDIG grant requirements, I have a multi-part response.

First, it is important for the taxpayers of North Carolina to know that we now require companies to formally attest to the veracity of the information they provide to us and ultimately to the NC Department of Revenue in order to meet either the eligible position or capital investment requirements. This is a legally binding affirmation and not one that companies take lightly.

However, based on your recommendations from "Best Practices in Carrying Out Economic Development Efforts," published by the National State Auditors Association and discussed in our exit interview with you and your staff, we understand that your main concern rests with developing a process for independently verifying capital investments for all grant recipients and the eligibility of positions from grant recipients that already have facilities and employees in North Carolina. Your goal is to ensure that all investments claimed are in fact made and that all positions identified as "new" are actually newly created and not transfers from an existing NC facility in addition to the affirmations we now require.

This brings me to the second part of my response. I believe that, before adding an additional layer of confirmation, we should conduct a comprehensive review of possible solutions. I am asking our team, led by the Commerce Finance Director and our General Counsel, to review best practices in other states with similar discretionary incentives, to fully explore the data currently available via state agencies that would meet this third-party verification standard and to develop recommendations on how we might adjust our processes, given our Department's resources. We will discuss these possible solutions with you and your staff no later than November 15, 2013, and look forward to finding a method that meets the intent of your recommendation, makes use of information readily reported and/or available within government agencies and follows the federal and state confidentiality requirements when dealing with such information.

In summary, our Department found value in this performance audit, the staff interactions, and the issues **put forth requiring further examination, and I am committed to retaining the public confidence that state** and corporate leaders, as well as North Carolina taxpayers, have in our JDIG program and processes. Our team has already taken steps to address two of your staff's recommendations with full implementation expected by August 15, 2013, and we will have a more complete response to the third recommendation by November 15, 2013.

I thank you and your staff for your insight and time.

Sharon Allred Decker

Sharon Allred Decker
Secretary

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ORDERING INFORMATION

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This audit required 1,837 audit hours at a cost of $132,264.