

REPORT ON EXAMINATION
OF THE

CENTER FOR PRACTICAL BIOETHICS, INC.
KANSAS CITY, MISSOURI

AS OF AND FOR THE YEAR ENDED DECEMBER 31, 2010

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McBRIDE, LOCK & ASSOCIATES

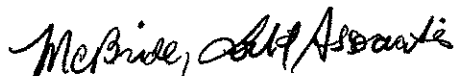
INDEPENDENT AUDITORS' REPORT

Board of Directors
Center for Practical Bioethics, Inc.
Kansas City, Missouri

We have audited the accompanying statement of financial position of the Center for Practical Bioethics, Inc. (a nonprofit organization) as of December 31, 2010, and the related statements of activities, functional expenses, and cash flows for the year then ended. These financial statements are the responsibility of the Center's management. Our responsibility is to express an opinion on these financial statements based on our audit. The prior year summarized comparative information has been derived from the Center for Practical Bioethics, Inc.'s 2009 financial statements and, in our report dated May 20, 2010, we expressed an unqualified opinion on those financial statements.

We conducted our audit in accordance with auditing standards generally accepted in the United States of America. Those standards 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.

In our opinion, the financial statements referred to above present fairly, in all material respects, the financial position of the Center for Practical Bioethics, Inc., as of December 31, 2010, and the changes in net assets and its cash flows for the year then ended in conformity with accounting principles generally accepted in the United States of America.



McBride, Lock & Associates
July 21, 2011

Center For Practical Bioethics, Inc.
STATEMENT OF FINANCIAL POSITION
December 31, 2010

<u>Assets</u>	Unrestricted	Temporarily Restricted	Permanently Restricted	Total	
				2010	2009
CURRENT ASSETS					
Cash and Cash Equivalents	\$ -	\$ 368,783	\$ -	\$ 368,783	\$ 343,464
Accounts Receivable	39,450	-	-	39,450	10,100
Grants Receivable (NOTE 2)	-	177,548	-	177,548	75,000
Pledge Receivable (NOTE 3)	5,101	-	-	5,101	4,500
Prepaid Expenses	5,642	-	-	5,642	9,149
Total Current Assets	\$ 50,193	\$ 546,331	\$ -	\$ 596,524	\$ 442,213
PROPERTY AND EQUIPMENT					
Furniture and Equipment	\$ 16,176	\$ -	\$ -	\$ 16,176	\$ 16,176
Computer Hardware and Software	14,420	-	-	14,420	18,090
Leasehold Improvements	1,965	-	-	1,965	1,965
Accumulated Depreciation and Amortization	(31,630)	-	-	(31,630)	(33,861)
Total Property and Equipment	\$ 931	\$ -	\$ -	\$ 931	\$ 2,370
OTHER ASSETS					
Cash - Restricted	\$ -	\$ -	\$ 100,601	\$ 100,601	\$ 1,191,119
Investments - Restricted (NOTE 4)	-	-	2,635,380	2,635,380	1,312,017
Accounts Receivable	-	-	2,133	2,133	2,533
Interfund Receivable (NOTE 8)	-	-	293,000	293,000	293,000
Pledge Receivable (NOTE 3)	-	-	972,657	972,657	975,344
Deferred Compensation	79,045	-	-	79,045	62,610
Total Other Assets	\$ 79,045	\$ -	\$ 4,003,771	\$ 4,082,816	\$ 3,836,623
TOTAL ASSETS	\$ 130,169	\$ 546,331	\$ 4,003,771	\$ 4,680,271	\$ 4,281,206
Liabilities					
CURRENT LIABILITIES					
Cash and Cash Equivalents	\$ 27,144	\$ -	\$ -	\$ 27,144	\$ -
Accounts Payable	25,360	-	-	25,360	32,264
Accrued Expenses	51,633	-	-	51,633	49,465
Interfund Payable (NOTE 8)	293,000	-	-	293,000	293,000
Deferred Revenue	18,000	-	-	18,000	1,750
Total Current Liabilities	\$ 415,137	\$ -	\$ -	\$ 415,137	\$ 376,479
LONG-TERM LIABILITIES					
457(b) Deferred Compensation Liability	\$ 75,339	\$ -	\$ -	\$ 75,339	\$ 59,029
Total Liabilities	\$ 490,476	\$ -	\$ -	\$ 490,476	\$ 435,508
Net Assets					
Unrestricted	\$ (360,307)	\$ -	\$ -	\$ (360,307)	\$ (216,438)
Temporarily Restricted (NOTE 7)	-	546,331	-	546,331	288,123
Permanently Restricted (NOTE 6)	-	-	4,003,771	4,003,771	3,774,013
Total Net Assets	\$ (360,307)	\$ 546,331	\$ 4,003,771	\$ 4,189,795	\$ 3,845,698
TOTAL LIABILITIES & NET ASSETS	\$ 130,169	\$ 546,331	\$ 4,003,771	\$ 4,680,271	\$ 4,281,206

The accompanying notes to the financial statements are an integral part of this statement.

Center For Practical Bioethics, Inc.
STATEMENT OF ACTIVITIES
For the Year Ended December 31, 2010

<u>Revenue</u>	Unrestricted	Temporarily Restricted	Permanently Restricted	Total	
				2010	2009
Contributions, grants, and other support	\$ 514,640	\$ 905,283	\$ 51,133	\$ 1,471,056	\$ 1,295,851
Fundraising	365,926	-	-	365,926	441,510
Membership Dues	148,990	-	-	148,990	192,115
Communications	5,044	-	-	5,044	6,007
Investment Income	1,177	-	61,380	62,557	39,323
Other Income	10,135	-	-	10,135	14,855
Net assets released from restrictions	713,100	(647,075)	(66,025)	-	-
Total Revenue	\$ 1,759,012	\$ 258,208	\$ 46,488	\$ 2,063,708	\$ 1,989,661
<u>Expenses</u>					
Program expenses					
Education and Consulting	\$ 1,481,855	\$ -	\$ -	\$ 1,481,855	\$ 1,321,645
Support services expenses					
Management and general	244,505	-	-	244,505	208,591
Fundraising	168,221	-	-	168,221	145,622
Total support services expenses	\$ 412,726	\$ -	\$ -	\$ 412,726	\$ 354,213
Total Expenses	\$ 1,894,581	\$ -	\$ -	\$ 1,894,581	\$ 1,675,858
Change in Net Assets from Operations	\$ (135,569)	\$ 258,208	\$ 46,488	\$ 169,127	\$ 313,803
Other Revenue (Expense):					
Realized Investment Gains (Losses)	\$ -	\$ -	\$ (13,410)	\$ (13,410)	\$ (52,049)
Unrealized Investment Gains (Losses)	1,354	-	215,136	216,490	225,957
Interest Expense	(9,354)	-	-	(9,354)	(11,030)
Investment Expense	(300)	-	(18,456)	(18,756)	(10,316)
Total Other Revenue (Expenses)	\$ (8,300)	\$ -	\$ 183,270	\$ 174,970	\$ 152,562
Change in Net Assets	\$ (143,869)	\$ 258,208	\$ 229,758	\$ 344,097	\$ 466,365
Net Assets, beginning of the year	(216,438)	288,123	3,774,013	3,845,698	3,379,333
Net Assets, end of year	\$ (360,307)	\$ 546,331	\$ 4,003,771	\$ 4,189,795	\$ 3,845,698

The accompanying notes to the financial statements are an integral part of this statement.

Center For Practical Bioethics, Inc.
STATEMENT OF FUNCTIONAL EXPENSES
For the Year Ended December 31, 2010

	Program Services			Support Services	
	Education and Consulting	Management and General	Fundraising	Total	
				2010	2009
<u>Personnel Expenses</u>					
Salaries & Wages - Management	\$ 182,584	\$ 41,630	\$ 81,213	\$ 305,427	\$ 314,440
Salaries & Wages - Other	668,188	98,591	14,453	781,232	706,841
Health Insurance	84,730	14,004	9,734	108,468	97,201
Contracted Services/Temporary Help	14,255	2,356	1,638	18,249	51,870
Payroll Taxes	58,980	9,748	6,776	75,504	74,655
Retirement Expense	14,989	2,476	1,727	19,192	22,980
Deferred Comp Plan Expense	12,738	2,104	1,467	16,309	17,592
Health Reimbursement Acct	380	63	44	487	6,709
Disability Expense	41	7	4	52	-
Workers Compensation	2,901	480	333	3,714	2,619
Key-man Insurance	3,274	541	376	4,191	4,191
Payroll Processing Fees	1,661	275	191	2,127	2,032
Employment Development	1,401	231	161	1,793	459
Search Expense	105	17	12	134	5,345
Other Employee Expense	33,259	5,497	3,821	42,577	312
Total Personnel Expenses	\$ 1,079,486	\$ 178,020	\$ 121,950	\$ 1,379,456	\$ 1,307,246
<u>Occupancy Expenses</u>					
Rent	\$ 44,826	\$ 7,408	\$ 5,149	\$ 57,383	\$ 62,066
Parking	1,938	320	223	2,481	2,344
Insurance-Property & Casualty	3,007	497	346	3,850	3,793
Other Occupancy Expense	848	140	97	1,085	-
Total Occupancy Expenses	\$ 50,619	\$ 8,365	\$ 5,815	\$ 64,799	\$ 68,203
<u>Operating Expenses</u>					
Consulting Fees	\$ 80,329	\$ 13,276	\$ 9,228	\$ 102,833	\$ -
Audit Fees	6,874	1,136	790	8,800	8,201
Professional/Filing Fees	2,180	360	250	2,790	379
Community Relations	78	13	9	100	631
Bank/Credit Card Charges	2,270	375	262	2,907	3,333
Finance/Late Charges	112	18	13	143	-
Office Expense & Supplies	16,989	2,808	1,951	21,748	13,978
Printing Expense	37,807	6,245	4,357	48,409	54,672
Books & Subscriptions	3,244	536	373	4,153	580
Dues & Memberships	1,258	208	144	1,610	3,397
Postage & Shipping Exp	9,364	1,548	1,076	11,988	9,699
Telephone Expense	8,815	1,457	1,013	11,285	10,062
Equipment Lease Expense	7,809	1,290	898	9,997	14,409
Equipment Maintenance	36,571	6,044	4,201	46,816	3,351
Equipment-Computer Expense	2,257	373	259	2,889	25,487
Insurance - D&O Liability	1,612	266	185	2,063	1,898
Insurance - Professional Liability	4,172	690	480	5,342	6,332
Conference/Mtg Expense	82,907	13,694	9,554	106,155	108,522
Travel Expense	39,907	6,595	4,585	51,087	34,047
Depreciation Expense	1,125	186	128	1,439	1,431
Scholarship Expense	780	129	90	999	-
Bad Debt Expense	2,655	439	306	3,400	-
Other Operating Expense	2,635	434	304	3,373	-
Total Operating Expenses	\$ 351,750	\$ 58,120	\$ 40,456	\$ 450,326	\$ 300,409
Total Program and Support Expenses	\$ 1,481,855	\$ 244,505	\$ 168,221	\$ 1,894,581	\$ 1,675,858

The accompanying notes to the financial statements are an integral part of this statement.

Center For Practical Bioethics, Inc.
STATEMENT OF CASH FLOWS
For the Year Ended December 31, 2010

	2010	2009
CASH FLOWS FROM OPERATING ACTIVITIES		
Change in net assets	\$ 344,097	\$ 466,365
Adjustments to reconcile change in net assets to net cash provided by (used in) operating activities:		
Depreciation and Amortization	1,439	1,431
Permanently restricted contributions	(51,133)	(325,719)
Restricted Cash included in Endowment Fund	1,090,518	(606,431)
Changes in operating assets and liabilities		
Accounts Receivable	(28,950)	24,118
Grants Receivable	(102,548)	155,379
Pledges Receivable	2,086	471,215
Prepaid Expenses	3,507	(3,956)
Deposits	-	808
Deferred Compensation	(16,435)	(17,727)
Accounts Payable	(6,904)	(29,747)
Accrued Expenses	2,168	4,715
Deferred Revenue	16,250	(24,750)
Accrued Deferred Compensation	16,310	17,592
NET CASH PROVIDED BY (USED IN) OPERATING ACTIVITIES	\$ 1,270,405	\$ 133,293
 CASH FLOWS FROM INVESTING ACTIVITIES		
Net Purchases of Equipment	\$ -	\$ (1,990)
Net Purchases of Investments	(1,323,363)	73,344
NET CASH USED IN INVESTING ACTIVITIES	\$ (1,323,363)	\$ 71,354
 CASH FLOWS FROM FINANCING ACTIVITIES		
Net Proceeds from (repayments of) Line of Credit	\$ -	\$ (251,000)
Proceeds from Permanently Restricted Contributions	51,133	325,719
NET CASH PROVIDED BY FINANCING ACTIVITIES	\$ 51,133	\$ 74,719
NET INCREASE (DECREASE) IN CASH	\$ (1,825)	\$ 279,366
CASH AND CASH EQUIVALENTS, BEGINNING OF YEAR	343,464	64,098
CASH AND CASH EQUIVALENTS, END OF YEAR	\$ 341,639	\$ 343,464

The accompanying notes to the financial statements are an integral part of this statement.

CENTER FOR PRACTICAL BIOETHICS, INC.
NOTES TO THE FINANCIAL STATEMENTS
December 31, 2010

NOTE 1 – SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

Nature of Activities

The Center for Practical Bioethics, Inc., (the “Center”) was incorporated in July 1984 as a Kansas not-for-profit corporation. The Center exists to raise and respond to ethical issues in health and healthcare to help patients, families, and health care providers find practical solutions to ethical problems. The guiding principles of the Center are as follows:

- To lead and promote the leadership of others
- To think critically and listen actively
- To address ethical issues unfettered by special interests
- To collaborate with others who share our values
- To work diligently toward our mission

Net Assets

The Center reports information regarding its financial position and activities according to three classes of net assets: unrestricted net assets, temporarily restricted net assets, and permanently restricted net assets.

Unrestricted – The portion of expendable funds that is available for support of the Center’s operations.

Temporarily restricted and permanently restricted – Funds that are subject to donor restrictions. These funds require either that the principal be invested in perpetuity or the income only be used by the Center or are temporarily restricted by the donor’s intent as to usage.

Revenue Recognition

Contributions – Pledges are recorded as unrestricted, temporarily restricted, or permanently restricted support in the period in which they are pledged.

Fundraising – Sponsorships and attendance fees received are recorded in the period in which the event occurs.

Membership revenues – Annual dues are assessed yearly based on the organizational or individual member’s anniversary date and are considered earned when received.

Accounts, Grants, and Pledges Receivable

The majority of the Center’s receivables are due from revenues earned from consulting agreements and from contributions. Receivables are due at the donor’s discretion. Accounts outstanding beyond the donor agreement are considered past due. The Center writes off receivables when they become uncollectible. No allowance for doubtful accounts was considered necessary at December 31, 2010.

Investments

Investments are stated at fair value based on quoted market prices, with unrealized gains and losses included in the accompanying statements of activities.

Property and Equipment

The Center capitalizes all significant acquisitions of property and equipment, which are recorded at cost, or fair value if donated. Property and equipment are depreciated using the straight-line method over the estimated useful life of the assets.

Income Taxes

The Center is exempt from income taxes under the provisions of Section 501(c)(3) of the Internal Revenue Code.

Cash Equivalents

The Center considers unrestricted cash, money market accounts, and highly liquid investments purchased with maturities of less than three months to be a cash equivalent.

Expense Allocation

The costs of providing various programs and other activities have been summarized on a functional basis. Accordingly, certain costs have been allocated among the programs and services benefited. The allocation rate corresponds to the functional allocation of salaries and wages.

Use of Estimates

The preparation of financial statements in conformity with generally accepted accounting principles in the United States of America requires management to make estimates and assumptions that affect certain reported amounts and disclosures. Accordingly, actual results could differ from those estimates.

NOTE 2 – GRANTS RECEIVABLE

Grants receivable at December 31, 2010:

Coalition to Transform Advanced Care	\$	110,000
Aging in Community		50,000
TPOPP		10,000
Capacity		7,548
Total Grants Receivable	\$	<u>177,548</u>

NOTE 3 – PLEDGES RECEIVABLE

Pledges Receivable at December 31, 2010 were as follows:

Due in less than one year	\$	961,524
Due in one to five years		<u>11,133</u>
Total Pledges Receivable	\$	<u><u>972,657</u></u>

NOTE 4 – INVESTMENTS

Investments consisted of the following as of December 31, 2010:

Cash Equivalents		
Money Market Funds	\$	57,786
Cash Reserves		35,904
Equities		1,483,124
Fixed Income		989,342
Real Estate		13,781
Tangible Assets		<u>55,443</u>
Total Investments	\$	<u><u>2,635,380</u></u>

NOTE 5 – RETIREMENT PLANS

The Center sponsors a 403(b) defined contribution pension plan that covers all employees. The Center matches 25% of employee contributions up to 5% of the employee's annual salary, for a total potential contribution from the Center of 1.25%. Employer contributions are vested over five years of service. In addition, during years that the Center has an increase in net assets, management may authorize a discretionary matching contribution in the amount of 1.75% of gross salaries. Total expense under this plan for the year ended December 31, 2009 was \$19,302.

During year ended December 31, 2006, the Center adopted a 457(b) deferred compensation plan for a key employee. The employee and the employer can make discretionary contributions. Total deferred compensation expense for the year ended December 31, 2010 was \$16,309.

NOTE 6 – PERMANENTLY RESTRICTED NET ASSETS

Net assets were permanently restricted for the following purposes as of December 31, 2010:

Rosemary Flanigan Ethics Chair	\$ 2,367,118
Foley Chair Endowment	1,549,915
Robert L. Biblo endowment	80,000
General Endowment	<u>6,738</u>
Total Permanently Restricted Net Assets	<u>\$ 4,003,771</u>

Foley Chair

During the year ended December 31, 2008, the Center entered into an agreement with Purdue Pharma L.P. whereby \$1,500,000 was contributed to provide funding for an endowed chair. The trust was funded in the amount of \$500,000 at the time of contractual signing by the Center, which occurred during the year ended December 31, 2008 and another payment was made in Fiscal Year 2009. The remaining balance of \$500,000 was paid during Fiscal Year 2011.

Francis Chair

During the year ended December 31, 2005, the John B. Francis Chair in Bioethics Fund was established with the Greater Kansas City Community Foundation by the Francis Family Foundation for the benefit of the Center. The principal amount pledged to the Fund was \$3,000,000, with the Center receiving annual distributions outlined by the terms of the agreement. The Francis Family Foundation has oversight responsibility of the fund for a period of 10 years after its inception. On the tenth anniversary date of the Fund, the Francis Family Foundation will transfer oversight responsibility to the Center provided conditions in the agreement are met.

NOTE 7 – TEMPORARILY RESTRICTED NET ASSETS

Net assets were temporarily restricted for the following purposes as of December 31, 2010:

John B Francis Chair	\$ 137,300
Aging in Community (Aging in Place)	65,743
Francis Family Foundation - Operating Reserve	50,000
Capacity	20,093
PAINS Action Initiative	110,412
Coalition to Transform Advanced Care	142,783
TPOPP	<u>20,000</u>
Total Temporarily Restricted Net Assets	<u>\$ 546,331</u>

NOTE 8 – INTERFUND RECEIVABLE/PAYABLE

The Center has a promissory note with the Flanigan Endowment, which was agreed to by the donor, with a face amount of \$300,000. The agreement will be reviewed annually on or about March 17 by the Finance Committee and Board of Directors. The note has an interest rate of “Wall Street Prime.” Accrued interest on the unpaid balance is due on or before the 15th day of the month following the last day of the month for which it is calculated. At December 31, 2010, the line of credit was drawn to \$293,000.

NOTE 9 – OPERATING LEASES

The Center leases its office space and certain equipment under operating leases. The office lease will expire January 31, 2016. Rent expense related to this operating lease was \$57,383 for the year ended December 31, 2010.

Future minimum lease payments under the office lease are as follows:

<u>Year Ending December 31,</u>	<u>Amount</u>
2011	\$ 64,342
2012	66,243
2013	68,230
2014	70,266
2015	72,391
2016	6,047

NOTE 10 – MAJOR CONCENTRATIONS

The Center maintains its cash balances within two accounts at a financial institution in Kansas City, Missouri. The balances are insured by the Federal Deposit Insurance Corporation up to \$250,000. The Center has pledged securities for balances in excess of insurance coverage. At December 31, 2010 the Center’s cash balances were adequately secured.

The Center invests in various investment securities. Investment securities are exposed to various risks such as interest rate, market, and credit risks. Due to the level of risk associated with certain investments securities, it is at least reasonably possible that changes could materially affect the amounts reported in the accompanying statements of financial position. The Board of Directors and management of the Center have established policies to provide prudent oversight of the investments.

NOTE 11 – ENDOWMENTS

The Center's endowment consists of three funds established for a variety of purposes. Its endowment includes donor-restricted endowment funds. As required by the accounting principles generally accepted in the United States of America (GAAP), net assets associated with endowment funds are classified and reported based on the existence or absence of donor-imposed restrictions.

The Board has determined that, absent explicit donor stipulations to the contrary, the Uniform Prudent Management of Institutional Funds Act (2006) (UPMIFA) statutes as adopted in Kansas and Missouri allow the Center to appropriate for expenditure or to accumulate so much of an endowment fund as the Center determines is prudent for the uses, benefits, purposes and duration for which the endowment funds were established, and to make such determinations to appropriate or accumulate fund assets in good faith pursuant to investment and spending policies implemented in the context of the perpetual nature of an endowment which are designed to maintain the value of the fund over time and to permit annual expenditure amounts that are prudent, after considering the following factors: (1) the duration and preservation of the endowment fund; (2) the purposes of the Center and the fund; (3) general economic conditions; (4) the possible effect of inflation or deflation; (5) the expected total return from income and the appreciation of investments; (6) other resources of the Center; and (7) the investment and spending policy of the Center.

Investment Return Objectives, Risk Parameters and Strategies

The Center has adopted investment and spending policies for the purpose of attempting to provide a reasonably predictable stream of funding to programs supported by endowment funds while also attempting to maintain the purchasing power of the Corporation's endowment assets over the long term. The corporation shall seek an achievable return of 7% (net of investment fees) taking into account both capital appreciation (realized and unrealized) and current yield (interest and dividends) calculated as a moving three (3) year average of the fair market value of the funds.

Spending Policy

The Center has a policy of appropriating for distribution each year for programs and administration an amount up to but not to exceed 6% of a moving three (3) year average of the fair market value of the endowment funds determined quarterly. This is consistent with the Center's objectives to appropriate for expenditure or to accumulate so much of an endowment fund for the uses, benefits, purposes and duration for which the endowment funds were established.

The endowment net asset composition of \$3,917,033 is included entirely in the Permanently Restricted Fund.

Changes in endowment net assets as of December 31, 2010 are as follows:

	Temporarily Restricted	Permanently Restricted	Total
Endowment net assets, beginning of the year	\$ -	\$ 3,687,600	\$ 3,687,600
Contributions	64,000	50,808	114,808
Investment Income	-	61,380	61,380
Net Appreciation	-	201,726	201,726
Amounts appropriated for expenditure	<u>(64,000)</u>	<u>(84,481)</u>	<u>(148,481)</u>
Endowment net assets, end of the year	<u>\$ -</u>	<u>\$ 3,917,033</u>	<u>\$ 3,917,033</u>

NOTE 12 – SUBSEQUENT EVENTS

Management has evaluated and noted no subsequent events through July 21, 2011, the date which the financial statements were available for issue.

McBRIDE, LOCK & ASSOCIATES

INDEPENDENT AUDITORS' REPORT ON INTERNAL CONTROLS

Board of Directors
Center for Practical Bioethics, Inc.
Kansas City, Missouri

In planning and performing our audit of the financial statements of the Center for Practical Bioethics, Inc. (the "Organization") as of and for the year ended December 31, 2010, in accordance with auditing standards generally accepted in the United States of America, we considered the Organization's internal control over financial reporting (internal control) as a basis for designing our auditing procedures 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 Organization's internal control. Accordingly, we do not express an opinion on the effectiveness of the Organization's internal control.

A deficiency in internal control exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct misstatements on a timely basis. A material weakness is a deficiency, or combination of deficiencies, in internal control such that there is a reasonable possibility that a material misstatement of the entity's financial statements will not be prevented, or detected and corrected on a timely basis.

Our consideration of internal control was for the limited purpose described in the first paragraph and was not designed to identify all deficiencies in internal control that might be significant deficiencies or material weaknesses and, therefore, there can be no assurance that all such deficiencies have been identified. We did not identify any deficiencies in internal control that we consider to be material weaknesses.

This communication is intended solely for the information and use of management, the Board of Directors, and others within the organization, and is not intended to be and should not be used by anyone other than these specified parties.



McBride, Lock & Associates
July 21, 2011