

GOVERNMENT OF GUAM

457 Deferred Compensation Plan

FINANCIAL STATEMENTS

December 31, 2019

(Together with Independent Auditor's Report Thereon)

GOVERNMENT OF GUAM
457 Deferred Compensation Plan

December 31, 2019

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INDEPENDENT AUDITORS' REPORT

To the Participants
Government of Guam 457 Deferred Compensation Plan:

Report on the Financial Statements

We have audited the accompanying financial statements of the Government of Guam 457 Deferred Compensation Plan (the "Plan"), administered by the Government of Guam Retirement Fund Board of Trustees (the "Fund") which comprise the statement of fiduciary net position and statement of changes in fiduciary net position as of and for the year ended December 31, 2019, and the related notes to the financial statements as listed in the table of contents.

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 audit. We conducted our audit in accordance with auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States. 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 Government of Guam 457 Deferred Compensation Plan as of December 31, 2019, and the changes in financial position for the year then ended in accordance with accounting principles generally accepted in the United States of America.

Emphasis of a Matter

As discussed in note 8 to the financial statements, the Fund determined that the worldwide COVID-19 situation may negatively affect its investments and the changes in net assets available for benefits. Due to the significant uncertainties caused by COVID-19, the Plan is unable to reasonably estimate the ultimate financial impact. Our opinion is not modified with respect to this matter.

Other Matters

Required Supplementary Information

Accounting principles generally accepted in the United States of America require that the management's discussion and analysis on pages 3 and 4 be presented to supplement the financial statements. Such information, although not a part of the basic financial statements, is required by the Governmental Accounting Standards Board, who considers it to be an essential part of financial reporting for placing the basic financial statements in an appropriate operational, economic, or historical context. We have applied certain limited procedures to the required supplementary information in accordance with auditing standards generally accepted in the United States of America, which consisted of inquiries of management about the methods of preparing the information and comparing the information for consistency with management's responses to our inquiries, the basic financial statements, and other knowledge we obtained during our audit of the basic financial statements. We do not express an opinion or provide any assurance on the information because the limited procedures do not provide us with sufficient evidence to express an opinion or provide any assurance.

Other Reporting Required by *Government Auditing Standards*

In accordance with *Government Auditing Standards*, we have also issued our report dated October 30, 2020, on our consideration of the Government of Guam 457 Deferred Compensation Plan'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 Government of Guam Retirement Fund's internal control over financial reporting and compliance.

Bryce A. Comm, P.C.

Tamuning, Guam
October 30, 2020

Government of Guam
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Management's Discussion and Analysis

December 31, 2019

This discussion and analysis of the Government of Guam's 457 Deferred Compensation Plan's (the "Plan") financial performance provides an overview of the Plan's financial activities for the year ended December 31, 2019. Please read this section in conjunction with the Plan's financial statements, which follow this section.

The notes to the Financial Statements provide additional information, which is essential to have a full understanding of the basic financial statements.

Financial Analysis

The following section provides further detail of activities within the Plan as well as additions and deductions to the Plan. Comparative financial schedules depict the changes between the years 2019 and 2018.

As of December 31, the Plan fiduciary net position was:

	Years Ended December 31,		Increase (Decrease)	% Change
	2019	2018		
Investments	\$ 91,765,237	\$ 69,642,784	\$ 22,122,453	31.77%
Receivables:				
Participant Loans	3,659,109	3,317,029	342,080	10.31%
Participant Contributions	428,108	348,493	79,615	22.85%
Total Receivables	4,087,217	3,665,522	421,695	11.50%
Cash	145,550	481,486	(335,936)	-69.77%
Total Assets	95,998,004	73,789,792	22,208,212	30.10%
Liabilities	-	-	-	-
Fiduciary net position	\$ 95,998,004	\$ 73,789,792	\$ 22,208,212	30.10%

Plan activities

The increase to net position in 2019 was primarily due to appreciation in the fair value of investments. The total increase in Plan net position was \$22.2 million or 30.10% over 2018.

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Notes to Financial Statements, continued

December 31, 2019

Changes in Fiduciary net position:

	<u>Years Ended December 31,</u> <u>2019</u>	<u>2018</u>	<u>Increase</u> <u>(Decrease)</u>	<u>%</u> <u>Change</u>
Investment Income:				
Net appreciation (depreciation) in				
fair value of investments	\$ 9,040,936	\$(9,461,188)	\$18,502,124	195.56%
Interest	<u>5,318,372</u>	<u>5,255,139</u>	<u>63,233</u>	<u>1.20%</u>
	14,359,308	(4,206,049)	18,565,357	194.35%
Less investment expenses	<u>164,281</u>	<u>79,568</u>	<u>84,713</u>	<u>106.47%</u>
Net investment income	14,195,027	(4,285,617)	18,480,644	431.22%
Member contributions	<u>11,985,234</u>	<u>11,218,669</u>	<u>766,565</u>	<u>6.83%</u>
Total Additions	26,180,261	6,933,052	19,247,209	277.62%
Benefits Paid to Participants	<u>(3,972,049)</u>	<u>(3,710,649)</u>	<u>(261,400)</u>	<u>7.04%</u>
Net increase in Fiduciary Net Position	22,208,212	3,222,403	18,985,809	589.18%
Fiduciary Net Position, beginning of year	<u>73,789,792</u>	<u>70,567,389</u>	<u>3,222,403</u>	<u>4.57%</u>
Fiduciary Net Position, end of year	<u>\$ 95,998,004</u>	<u>\$ 73,789,792</u>	<u>\$22,208,212</u>	<u>30.10%</u>

Additions

The money used to pay benefits is accumulated from contributions made by each participant and from income generated from the participant's investments, including investment appreciation and interest. Earnings on investments are reported net of investment expenses. Investment income net of fees during 2019 was \$14.2 million.

Member contributions to the Plan increased by approximately \$767,000 or 6.83% in 2019. Changes in contributions are primarily due to fluctuations in the average contribution per participant and the number of active plan participants. There were 6,348 active participants with account balances as of December 31, 2019 and 4,793 active participants with account balances as of December 31, 2018.

Deductions

Benefits paid to participants increased by \$261,000 or 7.04% in 2019. The change in the amount of benefits paid to participants from year to year is attributed to: the number of participants choosing to take lump sum distributions at retirement in any one year, to changes in the number of participants receiving benefits in the Plan, as well as the size of their account balance. Distributions are due largely to retirements and severance of employment.

GOVERNMENT OF GUAM
457 Deferred Compensation Plan
Statement of Fiduciary Net Position
December 31, 2019

Assets

Investments, at fair value	\$91,765,237
Participant loans receivable	3,659,109
Member contributions receivable	428,108
Cash	<u>145,550</u>
Total assets	<u><u>\$95,998,004</u></u>

Liabilities

Total liabilities	<u>-</u>
Fiduciary net position	<u><u>\$95,998,004</u></u>

See accompanying notes to the financial statements.

GOVERNMENT OF GUAM
457 Deferred Compensation Plan
Statement of Changes in Fiduciary Net Position
Year ended December 31, 2019

Investment Income

Net appreciation in fair value of investments	\$ 9,040,936
Interest	5,318,372
	<u>14,359,308</u>
Less investment expenses	164,281
Net investment income	<u>14,195,027</u>

Member contributions	<u>11,985,234</u>
Total Additions	26,180,261

Deductions

Benefits paid to participants	<u>3,972,049</u>
Total Deductions	<u>3,972,049</u>

Net increase in Fiduciary net position	22,208,212
Fiduciary net position, beginning of year	<u>73,789,792</u>
Fiduciary net position, end of year	<u><u>\$ 95,998,004</u></u>

See accompanying notes to the financial statements.

**Government of Guam
457 Deferred Compensation Plan**

Notes to Financial Statements

December 31, 2019

1. Description of the Plan

The following description of the Deferred Compensation Plan (the Plan) of the Government of Guam provides only general information. Participants should refer to the plan document for a more complete description of the Plan's provisions.

General

The Government of Guam maintains a nonqualified deferred compensation plan that constitutes an "eligible governmental plan" in accordance with Section 457(b) of the Internal Revenue Code (IRC) and comparable provisions under the Guam Territorial Income Tax Code. The Plan was established and maintained pursuant to Article 3, Chapter 8, Title 4, of the Guam Code Annotated effective May 1, 1999. Effective January 1, 2018, the Plan was amended to comply with the requirements of Public Law No. 33-186 (enacted by Guam Legislature on September 14, 2016), which established the "Government of Guam Defined Benefit 1.75 Retirement System (DB 1.75 Plan)" as codified in Article 5, Chapter 8, Title 4 of the GCA.

Investment Options are monitored by the Government of Guam Retirement Fund (GGRF or the Fund) Board of Trustees, which comprises of seven members, four of whom are elected and three of whom are appointed by the Governor with the advice and consent of the Guam Legislature. Two of the elected members must be GGRF retirees domiciled in Guam. These two members are elected by the GGRF retirees. The other two elected members must be GGRF active members with at least five years of employment with the Government of Guam. These members are elected by GGRF active members.

The Board has full discretionary authority and responsibility for the interpretation of the Plan provisions, the establishment of rules and regulations for the day to day administration of the Plan and the selection of investment options.

Participation

Participation in the Plan is voluntary for all employees, who are members of the following plans:

- The Government of Guam Defined Benefit Plan ("DB Plan"), and
- The Government of Guam Defined Contribution Retirement System ("DCRS").

Participation in the Plan is mandatory for all employees who are members of the DB 1.75 Plan. These employees are required to contribute a minimum of 1% of their base salary to the Plan.

Government of Guam
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Notes to Financial Statements, continued

December 31, 2019

1. Description of the Plan, continued

Contributions

Plan participants, including DB 1.75 participants may contribute up to 100% of their annual compensation not to exceed Internal Revenue Service (IRS) limits. Participants may direct the investment of their accounts in various investment options offered by the Plan. Participants who do not choose an investment option for all or part of their account will be deemed to have elected the default investment alternative under the Plan for that portion of their account balance.

Participant Accounts

Each participant's account is credited with the participant's contributions and allocations of Plan earnings, including interest, dividends, and gains/losses from investments. The benefit to which a participant is entitled is the benefit that can be provided from the participant's vested account.

Vesting

Participants are immediately vested in their contributions plus actual earnings and less any losses thereon.

Payment of Benefits

On termination of service due to death, disability, separation of service, retirement, or as otherwise permitted by the Plan, a participant may elect to receive a full or partial lump-sum distribution, periodic payments of a dollar certain, periodic payments for a time certain, or periodic payments over the lifetime of the participant.

A participant may also purchase a life or term-certain annuity, or simply leave the money on deposit until the date that they have a minimum annual distribution requirement. The IRS requires a minimum annual distribution to be made no later than April 1 of the calendar year following the later of the calendar year in which the employee attains age 70½, or the calendar year in which the employee retires.

Distributions will be net of any federal and state taxes required to be withheld. The participants also have the option of having a direct tax-free rollover to a new employer pension plan or a rollover to an Individual Retirement Account.

Government of Guam
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Notes to Financial Statements, continued

December 31, 2019

1. Description of the Plan, continued

Participant Loans

Participants may borrow from their accounts a minimum of \$1,000 up to a maximum equal to the lesser of \$50,000 or 50 percent of their vested account balance. The loans are secured by the balance in the participant's account and bear interest at a reasonable rate of interest to be fixed by the Plan Administrator from time to time. Principal and interest are paid ratably through regular payroll deductions. Loans must be repaid within five years, except for loans used to purchase a principal residence.

2. Summary of Significant Accounting Policies

Basis of Presentation

The financial statements presented herein have been prepared on the accrual basis of accounting under which expenses are recorded when the liability is incurred and revenues are recorded in the accounting period in which they are earned.

Employee contributions are recognized in the period in which contributions are due. Contributions from employees for service through December 31, 2019 are accrued.

Use of Estimates

The preparation of financial statement in conformity with accounting principles generally accepted in the United States of America requires the Plan administrator to make estimates and assumptions that could affect certain reported amounts and disclosures. Actual results could differ from those estimates.

Investment Valuation and Income Recognition

The Plan's investments are reported at fair value. Purchases and sales of investments are recorded on a trade-date basis. Interest income is recorded on the accrual basis. Net realized and unrealized gains and losses are reflected as net appreciation (depreciation) in the accompanying statement of changes in fiduciary net position.

**Government of Guam
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Notes to Financial Statements, continued

December 31, 2019

2. Summary of Significant Accounting Policies, continued

Administration of Plan Assets

The Government of Guam Retirement Fund Board of Trustees is responsible for the administration of the Plan. The daily operations of the Plan are administered by the Director who is designated by the Board as the Plan Administrator.

Empower Retirement (Empower) is the trustee and record keeper of the Plan. Empower invests funds received from contributions in accordance with participants' elections, records investment sales, interest income, and makes distribution payments to participants. During the year ended December 31, 2019, the Fund paid \$167,781 in administrative fees to Empower.

Payment of Benefits

Benefits are recorded when paid.

Cash

At December 31, 2019, the Plan had cash balances in banks of \$145,550, which is insured by the Federal Deposit Insurance Corporation up to \$250,000.

Participant Loans

Notes receivable from participants are measured at their unpaid principal balance plus any accrued but unpaid interest. Interest income is recorded on the accrual basis.

Loans are in arrears if any payment is missed. If the sum of all payments due in a calendar quarter are not made and payments are not received by the end of the following calendar quarter, the loan will be in default. As a result, the entire outstanding loan balance, including accrued but unpaid interest, shall be deemed distributed and will be tax reported in the calendar year of default.

3. Plan Termination

Although it has not expressed any intent to do so, the Legislature of the Government of Guam may, in its sole discretion, completely discontinue contributions or terminate the Plan by action of the Board of Trustees and direct the Board of Trustees with respect to the disposition of the Trust. The Government of Guam has established the Plan with the bonafide intention and expectation that the Plan shall continue indefinitely.

Government of Guam
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Notes to Financial Statements, continued

December 31, 2019

4. Tax Status

The Plan is an eligible deferred compensation plan as defined by Section 457 of the IRC. Accordingly, any amount of compensation deferred under the Plan and any income attributable to the amounts so deferred shall be included in gross income of the participant only for the taxable year in which such compensation or other income is distributed.

5. Investments

The following table lists the investment options available to participants and the value of each option at December 31, 2019.

Investment Option	Amount
AB Discovery Value Z	\$ 4,605,984
BNY Mellon Global Fixed Income I	1,422,329
DFA Emerging Markets Core Equity I	2,091,607
Great-West SF Balanced Fund	6,081,288
Great-West SF Lifetime 2020 Fund	5,534,923
Great-West SF Lifetime 2025 Fund	2,872,482
Great-West SF Lifetime 2030 Fund	7,863,416
Great-West SF Lifetime 2035 Fund	2,909,731
Great-West SF Lifetime 2040 Fund	5,275,750
Great-West SF Lifetime 2045 Fund	1,957,612
Great-West SF Lifetime 2050 Fund	2,339,599
Great-West SF Lifetime 2055 Fund	818,988
Hartford Total Return Bond Y	5,240,588
Principal Global Real Estate Sec Inst	462,697
Galliard Wells Fargo Stable Return	5,552,071
T. Rowe Price Instl Large Cap Growth	6,713,753
Touchstone International Small Cap Y	146,345
Transamerica International Equity I	3,960,581
Vanguard Inflation-Protected Secs Adm	1,610,301
Vanguard Institutional Index Fund	14,184,251
Vanguard Windsor II Fund	4,702,693
William Blair Small-Mid Cap Gr I	5,418,248
Total	\$ 91,765,237

As reflected above, the Plan offered 22 mutual fund options (including 12 target date funds) as of December 31, 2019.

**Government of Guam
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Notes to Financial Statements, continued

December 31, 2019

6. Fair Value Measurements

The Plan has the following fair value measurements as of December 31, 2019 (Investments measured at Fair Value):

	Fair Value Measurements Using			
	December 31, 2019	Quoted Prices in Active Markets for Identical Assets (Level 1)	Significant Other Observable Inputs (Level 2)	Significant Unobservable Inputs (Level 3)
Investments by fair value level				
Mutual Funds	\$ 91,765,237	\$91,765,237	-	-
Commingled Funds	-	-	-	-
Total investments by fair value level	\$ 91,765,237	\$91,765,237	-	-

Fair value is defined as the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date. The fair value hierarchy prioritizes the inputs to valuation techniques used to measure fair value. The hierarchy gives the highest priority to Level 1 measurements and the lowest priority to Level 3 measurements.

Funds classified in Level 1 of the fair value hierarchy are valued using prices in active markets for those securities. Funds classified in Level 2 are valued based on evaluated prices using a matrix pricing technique, which is used to value securities based on the securities' relationship to benchmark quoted prices. Level 3 inputs are significant unobservable inputs to the fair value measurement.

In some cases, the inputs used to measure fair value might fall in different levels of the fair value hierarchy. The level in the fair value hierarchy within which the fair value measurement in its entirety falls shall be determined based on the lowest level input that is significant to the fair value measurement in its entirety.

Assessing the significance of a particular input to the fair value measurement in its entirety requires judgment, considering factors specific to the asset or liability. Mutual fund investments are valued at the net asset value of shares held by the Plan at year end which are quoted in an active market, and are classified within Level 1 of the valuation hierarchy.

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Notes to Financial Statements, continued

December 31, 2019

6. Fair Value Measurements, continued

Plan investments are not FDIC insured, are not guaranteed by any bank, and involve investment risk, including the possible loss of the principal amount invested. Gains and losses (realized and unrealized) included in changes in fiduciary net position for the year ended December 31, 2019 are reported in net appreciation in fair value of investments.

7. Risk and Uncertainties

Investment securities are exposed to various risks, such as interest rate, market and credit risks. Due to the level of risk associated with certain investment securities and the level of uncertainty related to changes in the value of investment securities, it is at least reasonably possible that changes in risk in the near term would materially affect participant account balances and the amounts reported in the statement of fiduciary net position and the statement of changes in fiduciary net position.

Credit risk exists when there is the possibility the issuer or other counterparty to an investment may be unable to fulfill its obligations. Each participant is responsible for determining the risks and commensurate returns of their portfolio. The Plan's investment options consist of diversified mutual funds and therefore do not have credit risk.

Concentration of credit risk is the risk of loss attributed to the magnitude of an investment in a single issuer. If 5% or more of the total assets of the Plan are invested with one issuer then the investment is considered to have concentration risk. Investments issued or explicitly guaranteed by the U.S. government and investments in mutual funds or pools are excluded from concentration or credit risk requirements. The Plan investment options consists of diversified mutual funds and therefore do not have concentration risk.

Custodial credit risk is the risk that, in the event of a failure of the counterparty, the Plan would not be able to recover the value of its deposits, investments, or collateral securities that were in the possession of an outside party. Investment securities are exposed to custodial credit risk if they are uninsured or not registered in the name of the Plan and are held by either the counterparty or the counterparty's trust department or agent, but not in the Plan's name. Investments are held in a trust account for the benefit of the Plan. As a result, the investments of the Plan are not exposed to custodial credit risk.

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Notes to Financial Statements, continued

December 31, 2019

7. Risk and Uncertainties, continued,

Interest rate risk is the risk that changes in interest rates will adversely affect the value of an investment. The Plan invests in mutual funds, including debt-based mutual funds. Such funds are subject to interest rate risk; funds holding bonds with longer maturities are subject to more risk than funds holding bonds with shorter maturities.

Funds with exposure to interest rate risk are as follows:

1. Hartford Total Return Bond Y	\$ 5,240,588
2. Vanguard Inflation-Protected Secs Adm	\$ 1,610,301

Foreign currency risk is the risk that changes in exchange rates will adversely affect the fair value of an investment. The plan's diversified selection of funds encourages the participants to employ diversification, asset allocation, and quality strategies to minimize risks. Each participant is responsible for determining the risks and commensurate returns of their Portfolio.

The Plan's exposure to foreign currency risk is measured by fund allocation to foreign securities. Funds with investments in foreign securities include:

1. BNY Mellon Global Fixed Income I	\$ 1,422,329
2. DFA Emerging Markets Core Equity I	2,091,607
3. Touchstone International Small Cap Y	146,345
4. Transamerica International Equity	\$ 3,960,581

8. Managements' Review - Subsequent Events

Management has evaluated subsequent events through the date of the report. Events requiring disclosure are as follows:

COVID – 19: Both domestic and international equity markets have experienced declines due to the global Coronavirus (COVID-19) pandemic. COVID-19 may negatively affect the Plans' investments and the changes in fiduciary net position. However, due to significant uncertainties, the Fund is unable to reasonably estimate the ultimate financial impact.

There are no other events requiring disclosure.

BURGER & COMER, P.C.
CERTIFIED PUBLIC ACCOUNTANTS

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*

To the Participants
Government of Guam 457 Deferred Compensation Plan

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 Government of Guam 457 Deferred Compensation Plan administered by the Government of Guam Retirement Fund Board of Trustees (the "Fund"), as of and for the year ended December 31, 2019, and the related notes to the financial statements, which collectively comprise Government of Guam 457 Deferred Compensation Plan's basic financial statements, and have issued our report thereon dated October 30, 2020.

Internal Control over Financial Reporting

In planning and performing our audit of the financial statements, we considered Government of Guam 457 Deferred Compensation Plan'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 opinions on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of Government of Guam 457 Deferred Compensation Plan's internal control. Accordingly, we do not express an opinion on the effectiveness of Government of Guam 457 Deferred Compensation Plan'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 Government of Guam 457 Deferred Compensation Plan'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.

Bryce A. Comm, P.C.

Tamuning, Guam
October 30, 2020