



November 16, 2004

Memorandum for:     The Federal Co-Chair  
                                  ARC Executive Director

Subject:                 OIG Report 05-03  
                                  Review of Revolving Loan Fund (RLF) Grant for the  
                                  SEDA-Council of Governments

Attached are copies of the subject report dealing with the RLF grant to the SEDA-Council of Governments (SEDA-COG). SEDA-COG received its initial RLF Grant in 1990. As of April 30, 2004, SED-COG had received \$516,571 in ARC grant funds and has 11 loans outstanding, with an unpaid balance totaling \$539,121.

The report contains four recommendations. The responses by the grantee are considered responsive to the recommendations. They have agreed to take the necessary steps outlined in the recommendations.

This report is considered closed. However, ARC staff should verify that the promised actions have indeed taken place. Please contact me if you have any questions on this issue.

Clifford H. Jennings  
Inspector General

Attachment

cc:     Director for Program Operations  
          Director for Finance and Administration

**AUDIT OF THE ARC REVOLVING LOAN FUND  
OPERATED BY  
SEDA – Council of Governments  
Lewisburg, Pennsylvania**

**ARC Grant Number: PA-10109-88-I-302-0615  
PA-7752A-93-I-302-1117**

**August 16, 1990 through April 30, 2004**

**CAUTION: Certain information contained herein is subject to disclosure restrictions under the Freedom of Information Act, 5 U.S.C. 522 (b) (4). Distribution of this report should be limited to Appalachian Regional Commission and other pertinent parties.**

**Report Number: 05-03**

**Date: November 12, 2004**

**AUDIT OF THE ARC REVOLVING LOAN FUND  
OPERATED BY  
SEDA – Council of Governments  
Lewisburg, Pennsylvania**

**ARC Grant Number: PA-10109-88-I-302-0615  
PA-7752A-93-I-302-1117**

**August 16, 1990 through April 30, 2004**

**Prepared By:**

**Tichenor & Associates, LLP  
Certified Public Accountants  
304 Middletown Park Place, Suite C  
Louisville, Kentucky 40243**

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# TICHENOR & ASSOCIATES, LLP

CERTIFIED PUBLIC ACCOUNTANTS and MANAGEMENT CONSULTANTS

304 MIDDLETOWN PARK PLACE, SUITE C  
LOUISVILLE, KY 40243

BUSINESS: (502) 245-0775  
FAX: (502) 245-0725  
E-MAIL: TICHENORKY@AOL.COM

To: Appalachian Regional Commission (ARC)  
Office of Inspector General (OIG)

Report For: Federal Co-Chair Anne B. Pope  
ARC Executive Director Thomas M. Hunter  
OIG Report Number: 05-03

## Independent Auditor's Report

We have audited the ARC RLF grant Schedule of Fund Balance of the SEDA – Council of Governments as of April 30, 2004, and the related Statement of Source and Application of Funds for the period August 16, 1990 through April 30, 2004. These financial statements are the responsibility of the SEDA – Council of Governments. 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. We also used the ARC, OIG Audit Guide of ARC Revolving Loan Funds (RLF) as a guide. 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 our audit provides a reasonable basis for our opinion.

In our opinion, the accompanying ARC RLF grant financial statements present fairly in all material respects the financial position of the SEDA – Council of Government's fiduciary activities as of April 30, 2004 and the source and application of funds resulting from fiduciary activities for the period August 16, 1990 through April 30, 2004 in conformity with accounting principles generally accepted in the United States of America.

In accordance with Government Auditing Standards, we have also issued our report dated August 31, 2004, on our consideration of the SEDA – Council of Government's internal control over ARC RLF grant financial reporting and on our tests of compliance with certain provisions of laws and regulations, included herein. That report is an integral part of an audit performed in accordance with Government Auditing Standards and should be read in conjunction with this report in considering the results of our audit.

*Tichenor & Associates, LLP*

Tichenor & Associates, LLP  
Louisville, Kentucky  
August 31, 2004

**SEDA – Council of Governments**

**SCHEDULE OF FUND BALANCE  
(As of April 30, 2004)**

Cash in Bank	\$ 140,591
Loans Outstanding	<u>539,121</u>
Other Investments	<u>                    </u>
Due from Other Accounts	<u>                    </u>
Other Assets	<u>                    </u>
Less: Current Liabilities	<u>(8,022)</u>
Fund Balance	<u>\$ 671,690</u>

The accompanying auditor's report should be read with these financial statements.

**SEDA – Council of Governments**

**STATEMENT OF SOURCE AND APPLICATION OF FUNDS  
(For the period August 16, 1990 – April 30, 2004)**

Source of Funds	
ARC Grant	\$ 516,571
Program Income Transferred from PA Department of Commerce	<u>322,253</u>
Loan Interest Income	<u>344,026</u>
Fees Charged	<u>84,447</u>
Other Income	<u>49,662</u>
Total Funds Available	<u>\$ 1,316,959</u>
Application of Funds	
Cash in Bank	\$ 140,591
Loans Outstanding	<u>539,121</u>
Loan Losses	<u>4,556</u>
Administrative Expenses	<u>464,171</u>
Set Aside for Grant Match	<u>167,000</u>
Unreconciled Difference	<u>1,520</u>
Total Funds Applied	<u>\$ 1,316,959</u>

The accompanying auditor's report should be read with these financial statements.

# TICHENOR & ASSOCIATES, LLP

CERTIFIED PUBLIC ACCOUNTANTS and MANAGEMENT CONSULTANTS

304 MIDDLETOWN PARK PLACE, SUITE C  
LOUISVILLE, KY 40243

BUSINESS: (502) 245-0775  
FAX: (502) 245-0725  
E-MAIL: TICHENORKY@AOL.COM

## **Report on Compliance and on Internal Control over Financial Reporting Based on an Audit of the Financial Statements Performed in Accordance with Government Auditing Standards**

We have audited the ARC RLF grant financial statements of the SEDA – Council of Governments as of and for the period August 16, 1990 through April 30, 2004, and have issued our report thereon dated August 31, 2004. 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.

### **COMPLIANCE**

As part of obtaining reasonable assurance about whether the SEDA – Council of Government's ARC RLF grant financial statements are free of material misstatement, we performed tests of its compliance with certain provisions of laws and regulations, 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 instances of noncompliance that are required to be reported under Government Auditing Standards which are described in the accompanying Schedule of Findings.

### **INTERNAL CONTROL OVER FINANCIAL REPORTING**

In planning and performing our audit, we considered the SEDA – Council of Government's internal control over financial reporting for the ARC RLF grant in order to determine our auditing procedures for the purpose of expressing our opinion on the financial statements and not to provide assurance on the internal control over financial reporting. However, we noted a certain matter involving the internal control over financial reporting and its operation that we consider to be a reportable condition. Reportable conditions involve matters coming to our attention relating to significant deficiencies in the design or operation of the internal control over financial reporting that, in our judgment, could adversely affect the SEDA – Council of Government's ability to record, process, summarize and report financial data consistent with the assertions of management in the financial statements. The above mentioned reportable condition is described in the accompanying Schedule of Findings.



A material weakness is a condition in which the design or operation of one or more of the internal control components does not reduce to a relatively low level the risk that misstatements in amounts that would be material in relation to the financial statements being audited may occur and not be detected within a timely period by employees in the normal course of performing their assigned functions. Our consideration of the internal control over financial reporting would not necessarily disclose all matters in the internal control that might be reportable conditions and, accordingly, would not necessarily disclose all reportable conditions that are considered to be material weaknesses. However, we do not believe the reportable condition described above is a material weakness.

This report is intended solely for the information and use of the ARC; however, the final report is a matter of public record and its distribution is not limited.



Tichenor & Associates, LLP  
Louisville, Kentucky  
August 31, 2004

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## EXECUTIVE SUMMARY

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ARC makes grants to grantees. The grantee uses the grant funds to make loans to achieve economic benefits for a designated project area. As the loans are repaid, the principal funds and interest in excess of expenses are returned to the RLF to make other loans. The program's primary goal is private sector job creation and capital formation.

ARC requires that RLF projects be administered in accordance with the grantee's RLF plan. This plan defines specific objectives and operating procedures, including standards and selection criteria for loans. ARC does not normally approve or review individual RLF loans. Instead, ARC monitors RLF project grantee objectives for conformance with guidelines, the RLF plan and other grant agreement conditions.

The grantee is required to submit financial and progress reports to ARC.

### **Purpose:**

The purpose of the audit was to determine if (a) the administration by the SEDA – Council of Governments for its ARC Revolving Loan Fund Program was managed in accordance with the ARC approved grant and did not violate any restrictions imposed by the terms and conditions of the grant; (b) the accounting, reporting and internal control systems provided for disclosure of pertinent financial and operation information applicable to the revolving loan program; and (c) that the objectives of the grant are being met.

### **Background:**

ARC awarded Grant Numbers PA-10109-88-I-302-0615 and PA-7752A-93-I-302-1117 to SEDA – Council of Governments, effective August 16, 1990 and October 1, 1992, respectively. Total funding for the two grants was \$516,571. ARC did not require that the grant be matched with any grantee cash, contributed services, or in-kind contributions.

### **Scope:**

Tichenor & Associates, LLP, under contract to the Appalachian Regional Commission (ARC), Office of Inspector General (OIG), performed a financial, compliance and internal control audit in accordance with Government Auditing Standards and ARC, OIG Audit Guide of ARC Revolving Loan Funds (RLF) of ARC grant funds administered by SEDA – Council of Governments for the period August 16, 1990 through April 30, 2004.

As of April 30, 2004, SEDA – Council of Governments had eleven (11) ARC RLF loans outstanding, with an unpaid balance of \$539,121.

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## EXECUTIVE SUMMARY

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### **Audit Results:**

The audit resulted in the following:

#### a. Compliance

1. For the reporting year ending September 30, 2002, administrative expenses exceeded program income by \$1,392.
2. A discrepancy of \$1,520 was noted between grantee's records and the April 30, 2004 reconciled bank statement.
3. Berwick Forge & Fabrication Corp. filed for Chapter 7 bankruptcy on December 1, 1995. The loan balance of \$21,217 has not been written off and remains on the grantee's financial reports as delinquent.
4. The loan file for NuWeld, Inc. did not include documentation for credit life insurance.

#### b. Internal Control

1. Cash receipts are not deposited daily.

Refer to the Schedule of Findings for more details on each audit finding.

### **Recommendations:**

We recommend that the ARC require that SEDA – Council of Governments take the following actions:

#### a. Compliance

1. We recommend that the \$1,392 be returned to the RLF capital base.
2. Unless the discrepancy can be reconciled and properly documented, we recommend that the \$1,520 be paid to the RLF capital base.
3. We recommend that this loan be written-off.
4. We recommend that loan files be updated to include all required documentation and that loan files be routinely reviewed to ensure documents exist in accordance with ARC Guidelines.

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## EXECUTIVE SUMMARY

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### b. Internal Control

1. We recommend that all cash receipts be deposited on a daily basis.

#### **Auditee's Response:**

In response to our draft report, SEDA – Council of Governments officials agreed to each of the report's recommendations.

A copy of SEDA – Council of Governments' complete response to the draft report is included in this report as Exhibit – Auditee's Response.

#### **Auditor's Conclusion:**

We believe that by implementing the above recommendations, SEDA – Council of Governments will (a) be in compliance with the requirements and responsibilities of its ARC approved grant; and (b) strengthen its systems of internal controls providing for disclosure of pertinent financial and operating information applicable to the revolving loan program. We further believe that SEDA – Council of Governments is meeting the objectives of the grant.

## **SEDA – Council of Governments**

### **SCHEDULE OF FINDINGS**

#### **SUMMARY OF AUDIT RESULTS**

1. The auditors report expresses an unqualified opinion on the ARC RLF grant financial statements of SEDA – Council of Governments for the period August 16, 1990 through April 30, 2004.
2. Four (4) instances of noncompliance were disclosed during the audit.
3. One (1) reportable condition was disclosed during the audit.

#### **FINDINGS AND RECOMMENDATIONS**

##### **NONCOMPLIANCES**

1. For the reporting year ending September 30, 2002, administrative expenses exceeded program income by \$1,392.

The grantee stated that they were aware of administrative expenses exceeding program income for the period stated above.

ARC Guidelines (VI.B.2, effective October 16, 1999) states that “program income realized in a business year may be used to offset RLF administrative costs incurred only in that same year.”

Overcharging the loan fund for administrative expenses results in a reduction in the RLF capital base and the amount of funds available to loan.

We recommend that the ARC require that the grantee return the \$1,392 to the RLF capital base.

In response to our draft report, the grantee stated that they agreed with our finding and would return the \$1,392 to the RLF capital base.

2. A difference of \$1,520 was noted between grantee’s records and the April 30, 2004 reconciled bank statement. The grantee’s records showed “Funds Available for Loans” to be \$142,111 and “Cash in Bank” to be \$140,591 for the difference of \$1,520.

The grantee was not able to reconcile the difference, but stated that it must be due to a prior period misposting.

ARC Guidelines (VI.F.6) requires that grantees maintain accurate financial records of RLF activities.

Failure to maintain accurate records could result in funds being expended for purposes contrary to ARC objectives and/or a reduction in the RLF capital base and the amount of funds available to loan.

We recommend that the ARC require that the grantee pay the \$1,520 to the RLF capital base, unless the discrepancy can be reconciled and properly documented.

In response to our draft report, the grantee stated that they agreed with our finding and that the discrepancy would be reconciled.

3. Berwick Forge & Fabricating Corp. filed for Chapter 7 bankruptcy on December 1, 1995. This loan balance of \$21,217 has not been written off, but remains on the grantee's financial reports as delinquent.

The grantee stated that the loan has not been written off due to bankruptcy proceedings not being finalized. The grantee further stated that they would like the loan written off, but were not sure they were able to do so while bankruptcy proceedings were still in progress.

Generally accepted accounting principles require that uncollectible accounts be written-off and not included in fund balances.

If the loan remains on the grantee's records as delinquent, loan pool dollars are overstated by the amount that will not likely be recovered. In addition, the remaining balance of the loan is still included in the fund balance. An overstated fund balance could result in excess cash being held.

We recommend that the ARC require that this loan be written off, as it has been in bankruptcy proceedings for nearly nine years, and we believe that it is unlikely that SEDA – Council of Governments will collect any significant amounts when the proceedings are final.

In response to our draft report, the grantee stated that they agreed with our finding and, if the ARC agrees, will proceed to write-off the loan.

4. The loan file for NuWeld, Inc. did not include documentation for credit life insurance.

The grantee stated that the appropriate life insurance exists, but was not able to obtain the supporting documentation as evidence.

ARC Guidelines (V.B.4) and grantee's Loan Commitment Letter requires life insurance as a condition of lending.

Failure to include proper documentation could result in loans being made contrary to ARC Guidelines.

We recommend loan files be updated to include all required documentation and that loan files be routinely reviewed to ensure documents exist in accordance with ARC Guidelines.

In response to our draft report, the grantee obtained the proof of insurance in question. The grantee further stated that in the future, they will monitor the life insurance documents via internal database reports.

## **REPORTABLE CONDITIONS**

### **1. Cash receipts are not deposited daily.**

The grantee stated that it has always been their policy to deposit cash receipts on Mondays, Wednesdays, and Fridays.

Proper internal control procedures require that cash receipts be deposited daily.

Failure to deposit cash receipts on a daily basis could lead to the loss or theft of funds while on the premises.

We recommend that all cash receipts be deposited on a daily basis.

In response to our draft report, the grantee stated that in the future loan payment revenues will be deposited on a daily basis.

## **AUDITOR'S CONCLUSION**

We believe that by implementing the above recommendations, SEDA – Council of Governments will (a) be in compliance with the requirements and responsibilities of its ARC approved grant; and (b) strengthen its systems of internal controls providing for disclosure of pertinent financial and operating information applicable to the revolving loan program. We further believe that SEDA – Council of Governments is meeting the objectives of its grant.

**EXHIBIT**

**Auditee's Response**





September 15, 2004

Steve Sickmiller  
Senior Auditor  
C/O Tichenor and Associates, LLP  
7760 Olentangy River Road, Suite 207  
Columbus, OH 43235

**A  
LOCAL  
DEVELOPMENT  
DISTRICT**

*serving the counties of*

**Centre  
Clinton  
Columbia  
Juniata  
Lycoming  
Mifflin  
Montour  
Northumberland  
Perry  
Snyder  
Union**

RE: ARC Audit

Dear Mr. Sickmiller:

Please reference the findings from the recent ARC Audit you conducted at SEDA-COG, more specifically findings number three (3) and four (4) of your report.

- Item #1 - SEDA-COG is prepared to write-off the Berwick Forge and Fabricating Corporation ARC loan, as soon as we receive notification from ARC of their agreement to writing off this loan.
- Item #2 - Enclosed is a copy of the Life Insurance notification for the NuWeld, Inc. ARC loan. We apologize for not having this information available for you at the time of the audit. However, the client has given us proper documentation of Life Insurance Company since that time, resulting in life insurance security as required by the ARC.

Mr. Sickmiller I hope this information satisfies items three (3) and four (4) of your findings. In the event you need additional information concerning these matters please feel free to contact me.

Very truly,

A handwritten signature in cursive script that reads "James L. McClure".

James L. McClure  
Director  
Finance Programs

Enclosures

JLM/mam

C:\mmensch\RSavidge\jim\Letters\ARC Audit requests Aug 2004 Audit.doc

**SEDA  
Council of  
Governments**

**201 Furnace Rd  
Lewisburg  
PA 17837  
USA**

**(570) 524-4491  
fax 524-9190**

# Fax Cover Sheet



**A  
LOCAL  
DEVELOPMENT  
DISTRICT**

serving the counties of

- Centre
- Clinton
- Columbia
- Junata
- Lycoming
- Mifflin
- Montour
- Northumberland
- Perry
- Snyder
- Union

Date:

10-21-04

To:

Jack Somerville

Phone:

Fax:

From:

Kate Bails

Phone:

(570)524-4491

Fax:

(570)524-9190

Re:

Number of pages including cover sheet:

6

Message:

Audit Response

**SEDA  
Council of  
Governments**

RR #1 Box 572  
Lewisburg  
PA 17837  
USA

(570) 524-4491  
fax 574-9190

## EXECUTIVE SUMMARY

### Auditee's Response and Auditor's Conclusion:

#### Audit Results:

The audit resulted in the following:

a. Compliance

1. For the reporting year ending September 30, 2002, administrative expenses exceeded program income by \$1,392.

During our fiscal audit, we found some revenue that did not belong to ARC and, therefore, expenses were higher than revenue. We agree, money to be paid back from other sources.

2. A discrepancy of \$1,520 was noted between grantee's records and the April 30, 2004, reconciled bank statement.

Because of #1, report was also incorrect and needs adjusted. Above adjustment will resolve this issue.

3. Berwick Forge & Fabrication Corp. filed for Chapter 7 bankruptcy on December 1, 1995. The loan balance of \$21,217 has not been written off and remains on the grantee's financial reports as delinquent.

We agree, and if ARC responds positively, we will proceed with the write off.

4. The loan file for NuWeld, Inc. did not include documentation for credit life insurance.

Enclosed is proof of insurance on the life of Timothy Sattersfield who is the secretary/treasurer of NuWeld and is the "key man" of the company's management team. The finance staff will monitor the life insurance documents via internal database reports.

b. Internal Control

1. Cash receipts are not deposited daily.

The daily deposit of cash receipts will be incorporated into our processing of future loan payment revenues.

Refer to the Schedule of Findings for more details on each audit finding.

### Recommendations:



Pruco Life Insurance Company,  
a Prudential company

KAAX9 H

SEDA-COUNCIL OF GOVERNME  
201 FUNACE RD  
LEWISBURG PA 17837

## Notice of Contract Assignment

For insurance service, get in touch with your  
representative or this office:

PRUDENTIAL  
4250 GRUMS MILL ROAD  
HARRISBURG PA 17112  
TEL 717-657-2740

Contract Number L4 111 586  
TIMOTHY SATTERFIELD  
2003 Terra

September 16, 2004

We have recorded and filed the assignment on this contract. A copy of the assignment is enclosed. We do not assume responsibility for the validity or sufficiency of the assignment.

Premiums are paid to November 1, 2004, and are payable quarterly.

We have not received written notice of any prior loans or claims on this contract.

Your Pruco Life representative is  
HENRY DUNN INC  
telephone number





09/08/2004 13:58 FAX 570 288 6225

KOSMALA ASSOC

003

**Request for a Collateral Assignment**  
*(continued)*

Name of assignee (first, middle initial, last name)

S E D A - C o u n t y I l l o i s G o v e r n m e n t s

Apt

Street

2 0 1 F u r a c a R o a d

City

L e w i s p e r e

State

P A

ZIP code

1 7 8 3 7

Name of joint assignee, if any (first, middle initial, last name)

Street

City

State

ZIP code

If there are two or more persons named as joint assignees, please check one of the boxes below. If neither box is checked, we will assume that the assignment is made jointly with the right of survivorship.

jointly or the survivor(s)

as tenants in common

**Additional Information**

Use this section if the assignment is for more than two joint assignees. For each additional joint assignee, please provide a full name and address.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**Signature Requirements**

Please review these signature requirements before signing in section 6 for a collateral assignment or in section 7 for a Discharge of Assignment.

- For corporations, an authorized officer must sign. Be sure to include the title of the officer.
  - If president – no additional requirements
  - If vice president – for policies over \$1,000,000, provide a Corporate Secretary's statement reflecting the vice president's authority to sign
  - If any other officer – provide a corporate resolution
- For partnerships with at least two general partners, two authorized general partners must sign with the title "general partner" after each name (if only one, use "sole general partner") and include the name of the partnership.
- For sole proprietorships, submit the signature of the owner, followed by "doing business as (company name), a sole proprietorship."
- For trusts, each trustee must sign unless the trust itself or state law provides otherwise. Trustee must include trustee designation (for example, "John Doe, Trustee under Trust Agreement dated 1/1/1998")
- A holder of power of attorney must provide a copy of the power of attorney and include, following his or her signature, the words "Attorney-in-fact for (owner's name)."
- For a policy containing a limitation of rights, the person or entity in whose favor the rights have been limited must also sign.

09/08/2004 13:58 FAX 670 238 8225

KOSMALA ASSOC

004

**Assignment** By signing this form, I:

Signature(s)  
(All owners must sign.)

- certify that I am authorized to sign this form,
- authorize the collateral assignment requested on this form, which is subject to the terms and conditions of the policy, and
- certify that if the owner is a corporation or partnership, that it is not under receivership, trusteeship, or conservatorship, and/or has not been dissolved, and if a partnership, that no notice of disassociation has been filed by any partner.

X T. Sattler  
Policyowner's signature and date

08 26 2004  
month day year

X \_\_\_\_\_  
Joint owner's signature (if applicable) and date

month day year

Signer's title for business or trust owner Company name

**Discharge of Assignment** Signature(s)

If there is more than one assignment to the same assignee, specify which one(s) to release by indicating the date(s) of the assignment(s) below. We will release all assignments to that assignee unless otherwise requested.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

If the assignee is a bank or lending institution that has merged with or been purchased by another institution, an officer of the new bank or lending institution must sign this form in order to discharge the collateral assignment. That officer must also provide a statement indicating that the new bank or lending institution is the successor to the previous assignee.

By signing this form, I authorize the release and discharge of any and all assignments indicated above. (If none are specified, we will release all assignments to that assignee.)

X \_\_\_\_\_  
Collateral assignee's signature and date

month day year

X \_\_\_\_\_  
Joint assignee's signature (if applicable) and date

month day year

Signer's title for business or trust assignee Company name

**Acknowledgment**  
(For Home Office use only)

We will not be considered as having any notice or knowledge of this assignment or discharge unless it is filed at our Home Office. We are not obligated to see that the assignment or discharge is valid or sufficient.

Assignment returned and filed by us. Cruch

Discharge recorded and filed by us.

Secretary 9/15/04 SAD  
Date By

Secretary \_\_\_\_\_  
Date By

For Prudential Use Only	Contract/Agency _____	Prudential Representative _____
	Submitting office _____	FMO _____