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**WHITE CITY ENHANCED LAW  
ENFORCEMENT DISTRICT**

*Comprehensive Annual  
Financial Report*



**JACKSON  
COUNTY**  
*o r e g o n*

**Fiscal Year 2019-2020**

Ending June 30, 2020

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**WHITE CITY ENHANCED  
LAW ENFORCEMENT DISTRICT**  
(a Component Unit of Jackson County, Oregon)

**ANNUAL FINANCIAL REPORT**

**Fiscal Year Ended June 30, 2020**

## Table of Contents

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LIST OF PRINCIPAL OFFICIALS	1
REPORT OF INDEPENDENT AUDITORS	2-3
MANAGEMENT DISCUSSION & ANALYSIS	4-6
BASIC FINANCIAL STATEMENTS:	
Government-wide Financial Statements:	
Statement of Net Position	7
Statement of Activities	8
Fund Financial Statements:	
Balance Sheet – Governmental Fund	9
Statement of Revenues, Expenditures and Changes in Fund Balance – Governmental Fund	10
Statement of Revenues, Expenditures and Changes in Fund Balance – Budget and Actual	11
Notes to Financial Statements	12-15
REPORT OF INDEPENDENT AUDITORS ON COMPLIANCE AND ON INTERNAL CONTROL OVER FINANCIAL REPORTING BASED ON AN AUDIT OF FINANCIAL STATEMENTS PERFORMED IN ACCORDANCE WITH <i>OREGON MINIMUM AUDIT STANDARDS</i>	16-17

**WHITE CITY ENHANCED LAW ENFORCEMENT DISTRICT**  
**(a Component Unit of Jackson County, Oregon)**

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**LIST OF PRINCIPAL OFFICIALS**

as of June 30, 2020

Board of Directors  
(Jackson County Commissioners)

Colleen Roberts

Bob Strosser

Rick Dyer

Jackson County Sheriff

Nathan Sickler

County Administrator - Budget Officer

Danny Jordan

Finance Director - Registered Agent

Shannon Bell

All Board of Commissioners, County Administrator, and Finance Director receive mail at:  
10 South Oakdale Avenue  
Medford, Oregon 97501

## **Report of Independent Auditors**

Board of Directors  
White City Enhanced Law Enforcement District

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

We have audited the accompanying financial statements of the governmental activities, the major fund, and the budgetary comparison of White City Enhanced Law Enforcement District (the District), a component unit of Jackson County, Oregon, as of and for the year ended June 30, 2020, and the related notes to the financial statements, which collectively comprise the District's basic 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 opinions 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. 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 District'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 District'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 opinions.

### ***Opinions***

In our opinion, the financial statements referred to above present fairly, in all material respects, the financial position of the governmental activities and the major fund of the District as of June 30, 2020, and the respective changes in financial position and the budgetary comparison statement for the year then ended in accordance with accounting principles generally accepted in the United States of America.

## **Other Matter**

### *Required Supplementary Information*

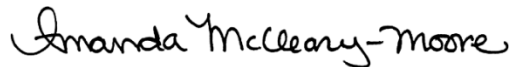
Accounting principles generally accepted in the United States of America require that the management's discussion and analysis on pages 4 through 6 be presented to supplement the basic financial statements. Such information, although not a part of the basic financial statements, is required by the Governmental 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 Information*

The list of principal officials on page 1 is presented for purposes of additional analysis and is not a required part of the basic financial statements. Such information has not been subjected to the auditing procedures applied in the audit of the basic financial statements, and accordingly, we do not express an opinion or provide any assurance on it.

## **Report on Other Legal and Regulatory Requirements**

In accordance with the *Minimum Standards for Audits of Oregon Municipal Corporations*, we have issued our report dated December 16, 2020 on our consideration of the District's compliance with certain provisions of laws and regulations, including the provisions of Oregon Revised Statutes as specified in Oregon Administrative Rules. The purpose of that report is to describe the scope of our testing of compliance and the results of that testing and not to provide an opinion on compliance.



Amanda McCleary-Moore, Partner for  
Moss Adams LLP  
Medford, Oregon  
December 16, 2020

## **Management Discussion & Analysis**

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As management of the White City Enhanced Law Enforcement District (the District), we offer readers of the District's financial statements this narrative overview and analysis of the District's financial activities for the fiscal year ended June 30, 2020.

### **Financial Highlights**

- The District's assets exceeded its liabilities at the close of the fiscal year by \$990,152 (net position). This is a decrease of \$113,008 from the prior fiscal year. This net position is restricted, representing resources that are subject to external restrictions on how they may be used.
- At the close of the current fiscal year, the fund balance for the District was \$918,459, or 52.8% of total District expenditures. The previous year, the fund balance for the District was \$1,029,347 or 72.7% of total District expenditures.

### **Overview of the Financial Statements**

The discussion and analysis provided here is intended to serve as an introduction to the White City Enhanced Law Enforcement District's basic financial statements. The District's basic financial statements consist of two components: 1) financial statements, and 2) notes to the financial statements.

**Government-wide financial statements.** The financial statements are designed to provide readers with a broad overview of the District's finances, in a manner similar to a private-sector business.

The *statement of net position* presents financial information on all of the District's assets, deferred outflows of resources, liabilities, and deferred inflows of resources, with the difference between the four reported as *net position*. Over time, increases or decreases in net position may serve as a useful indicator of whether the financial position of the District is improving or deteriorating.

The *statement of activities* presents information on changes in the District's net position during the fiscal year. All changes in net position are reported as soon as the underlying event giving rise to the change occurs, *regardless of the timing of related cash flows*. Thus, revenues and expenses are reported for some items that will only result in cash flows in future fiscal periods (e.g., uncollected property taxes).

The government-wide financial statements can be found on pages 7 through 8 of this report.

**Fund financial statements.** A *fund* is a grouping of related accounts used to maintain control over resources that have been segregated for specific activities or objectives. The District, like other state and local governments, uses fund accounting to ensure and demonstrate compliance with finance-related legal requirements. The District reports one governmental fund, the general fund.

The fund financial statements can be found on pages 9 through 11 of this report.

**Notes to the financial statements.** The notes provide additional information necessary to acquire a full understanding of the data provided in the government-wide and fund financial statements. The notes to the financial statements can be found on pages 12 through 15 of this report.

**White City Enhanced Law Enforcement District**  
**(a Component Unit of Jackson County, Oregon)**  
**Management Discussion and Analysis**

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**Financial Analysis**

As noted earlier, net position over time, may serve as a useful indicator of a government's financial position. The White City Enhanced Law Enforcement District's assets exceeded its liabilities by \$990,152 at the close of the most recent fiscal year.

**Statement of Net Position**

	2020	2019
Assets	\$ 1,033,650	\$ 1,132,084
Liabilities	43,498	28,924
Restricted net position	\$ 990,152	\$ 1,103,160

**Financial activities.** Financial activities during the year decreased the District's net position by \$113,008. This is a reduction of \$212,443 from last year's increase in net position of \$99,435. This year's decrease was caused primarily by an increase in total expenses of \$323,051 (or 22.8%), offset by an increase in total revenues of \$110,613 (or 7.30%). Key elements to the change include:

- An increase of property tax revenues from the prior fiscal year of approximately \$117,000.
- An increase in operating expenses of approximately \$320,000, primarily due to increased employee benefit expenses from new State of Oregon PERS contribution requirements.

**Changes in Net Position**  
**For the fiscal year ended June 30, 2020**

	2020	2019
Revenues:		
General Revenues		
Property taxes	\$1,594,941	\$1,477,451
Interest income	31,326	38,203
Total revenues	1,626,267	1,515,654
Expenses:		
Community Justice & Safety	1,739,275	1,416,219
Change in net position	(113,008)	99,435
Net position - beginning	1,103,160	1,003,725
Net position - ending	\$ 990,152	\$ 1,103,160

**Budgetary Highlights**

Actual expenditures were under the final amended budget by \$80,035. Major reasons for this difference are primarily due to lower than expected personnel expenses.

**Economic factors and budget information for next year**

The District's 2020-21 expenditure budget is \$2,460,798, appropriated as materials and services. This represents a decrease of 0.89% from the final 2019-20 budget, primarily due to a reduction in materials and services expense.

In March 2020 COVID-19 was officially classified as a global pandemic. As a result, the Governor of the State of Oregon instituted emergency measures stop the spread of the virus. The measures included an unprecedented shutdown and subsequent restrictions on private and government organizations. In response to the economic fallout caused by the emergency measures, the federal government passed an economic stimulus package called the Coronavirus Aid, Relief and Economic Security Act (CARES Act). CARES Act funding can only be used to reimburse cost incurred between March 1st and December 31st 2020. At this point the federal government has not allocated any additional funding for costs that will be incurred during 2021. It is uncertain what impact, if any, COVID-19 will have on the District.

**Requests for Information**

This financial report is designed to provide to citizens, customers, investors, creditors, and others a general overview of the District's finances and to demonstrate accountability for the funds it receives. Questions concerning any of the information provided in this report, requests for additional financial information, or requests for copies of the County's other blended component units should be addressed to the Jackson County Finance Director, 10 S. Oakdale Ave., Room 113, Medford, OR 97501.

## **Basic Financial Statements**

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**White City Enhanced Law Enforcement District**  
**(a Component Unit of Jackson County, Oregon)**  
**Statement of Net Position**  
**June 30, 2020**

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ASSETS	
Cash and equivalents	\$ 938,589
Property taxes receivable	94,018
Due from Jackson County	<u>1,043</u>
Total assets	<u>1,033,650</u>
LIABILITIES	
Due to Jackson County	<u>43,498</u>
Total liabilities	<u>43,498</u>
NET POSITION	
Restricted	<u>990,152</u>
Total net position	<u><u>\$ 990,152</u></u>

**White City Enhanced Law Enforcement District**  
**(a Component Unit of Jackson County, Oregon)**  
**Statement of Activities**  
**For the fiscal year ended June 30, 2020**

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EXPENSES	
Community Justice & Safety	\$ 1,739,275
GENERAL REVENUES	
Property taxes	1,594,941
Interest	31,326
Total general revenues	<u>1,626,267</u>
Change in net position	(113,008)
Net position - beginning	<u>1,103,160</u>
Net position - ending	<u><u>\$ 990,152</u></u>

**White City Enhanced Law Enforcement District**  
**(a Component Unit of Jackson County, Oregon)**  
**Balance Sheet**  
**Governmental Fund**  
**June 30, 2020**

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<b>ASSETS</b>	
Cash and equivalents	\$ 938,589
Property taxes receivable	94,018
Due from Jackson County	<u>1,043</u>
Total assets	<u><u>\$ 1,033,650</u></u>
<b>LIABILITIES</b>	
Due to Jackson County	<u>\$ 43,498</u>
Total liabilities	<u>43,498</u>
<b>DEFERRED INFLOWS OF RESOURCES</b>	
Unavailable revenue - property taxes	<u>71,693</u>
<b>FUND BALANCE</b>	
Restricted	<u>918,459</u>
Total liabilities, deferred inflows of resources and fund balance	<u><u>\$ 1,033,650</u></u>
Amounts reported for governmental activities in the statement of net position are different because:	
Total fund balance shown above	\$ 918,459
Property taxes receivable are not available to pay current period expenditures and, therefore, are deferred in the funds	<u>71,693</u>
Net position	<u><u>\$ 990,152</u></u>

**White City Enhanced Law Enforcement District**  
**(a Component Unit of Jackson County, Oregon)**  
**Statement of Revenues, Expenditures and Changes in Fund Balance**  
**Governmental Fund**  
**For the fiscal year ended June 30, 2020**

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REVENUES	
Property taxes	\$ 1,597,061
Interest	<u>31,326</u>
Total revenues	1,628,387
EXPENDITURES	
Community Justice & Safety	<u>1,739,275</u>
Net change in fund balance	(110,888)
Fund balance - beginning	<u>1,029,347</u>
Fund balance - ending	<u><u>\$ 918,459</u></u>
Reconciliation of the Statement of Revenues, Expenditures and Changes in Fund Balance to the Statement of Activities:	
Amounts reported in the statement of activities are different because:	
Net change in fund balance shown above	\$ (110,888)
Property tax revenues in the statement of activities that do not provide current financial resources are not reported as revenues in the funds. This is the effect of the change in the deferral of these amounts during the year.	<u>(2,120)</u>
Change in net position	<u><u>\$ (113,008)</u></u>



**White City Enhanced Law Enforcement District**  
**(a Component Unit of Jackson County, Oregon)**  
**Statement of Revenues, Expenditures and Changes in Fund Balance**  
**Budget and Actual**  
**For the fiscal year ended June 30, 2020**

	Budgeted Amounts		Actual Amounts	Variance with Final Budget
	Original	Final		
<b>REVENUES</b>				
Property taxes	\$ 1,539,189	\$ 1,539,189	\$ 1,597,061	\$ 57,872
Interest	10,000	10,000	31,326	21,326
Total revenues	1,549,189	1,549,189	1,628,387	79,198
<b>EXPENDITURES</b>				
Current:				
Community Justice & Safety:				
Materials and services	2,482,831	2,686,094	1,739,275	946,819
Total expenditures	2,482,831	2,686,094	1,739,275	946,819
Net change in fund balance	(933,642)	(1,136,905)	(110,888)	1,026,017
Fund balance - beginning	933,642	1,136,905	1,029,347	(107,558)
Fund balance - ending	\$ -	\$ -	\$ 918,459	\$ 918,459

**Notes to Financial Statements**

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**White City Enhanced Law Enforcement District**  
**(a Component Unit of Jackson County, Oregon)**  
**Notes to Financial Statements**  
**For the fiscal year ended June 30, 2020**

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**I. Summary of significant accounting policies**

The financial statements of the White City Enhanced Law Enforcement District (the District) have been prepared in conformity with generally accepted accounting principles (GAAP) as applied to government units. The more significant of the District's accounting policies are described below.

**A. Reporting entity**

The District was created on June 14, 1995, under authority of Oregon Revised Statutes Chapter 451, by the Jackson County Board of Commissioners. In September 1995, upon voter approval by the citizens within the White City unincorporated urban containment area, a five-year serial levy of \$452,527 per year was authorized. This levy was converted to a permanent rate of \$2.0211 per thousand by Ballot Measure 50 in November 1997. This State-wide measure converted existing serial levies to permanent rates and "rolled back" assessed values to 1995-96 levels less 10%. The District realized a 7.6% decrease in tax revenues as a result of this measure. The Jackson County Board of Commissioners, which also serves as the Board of the District, oversees policy direction for the District. The Jackson County Sheriff's Office has entered into a contractual agreement with the District to provide enhanced public safety service within District boundaries.

Because the District's governing body is identical to that of Jackson County, Oregon (County), and because the District's day-to-day operations are managed by County personnel, the District has been determined under standards established by GAAP to be a blended component unit of the County. As a result, the District's financial statements are blended with those of the County by including them in the appropriate statements and schedules of the County's Comprehensive Annual Financial Report. The District is reported as a non-major special revenue fund.

**B. Basis of presentation - government-wide financial statements**

The Statement of Net Position and Statement of Activities report information on all of the activities of the District. The government-wide financial statements are reported using the economic resources measurement focus and the accrual basis of accounting. Revenues are recorded when earned and expenses are recorded at the time liabilities are incurred, regardless of when the related cash flows take place. Nonexchange transactions, in which the District gives (or receives) value without directly receiving (or giving) equal value in exchange, include taxes, grants, and entitlements. On an accrual basis, revenue from taxes is recognized in the fiscal year for which the taxes are levied. Revenue from grants, entitlements and donations is recognized in the fiscal year in which all eligibility requirements have been satisfied.

**C. Basis of presentation - fund financial statements**

The District uses one fund to report on its financial position and the results of its operations. The fund accounts for the general administration of the District and for the acquisition of services from the Jackson County Sheriff's Office.

**I. Summary of significant accounting policies (continued)**

**C. Basis of presentation - fund financial statements (continued)**

The District's governmental fund type is accounted for using a current financial resources measurement focus and the modified accrual basis of accounting. Revenues are recognized as soon as they are both measurable and available. Revenues are considered to be available when they are collectible within the current period or soon enough thereafter to pay liabilities of the current period. For this purpose, the District considers revenues to be available if they are collected within 60 days of the end of the current period. Expenditures are recorded when the related liability is incurred.

Property taxes and interest associated with the current fiscal period are considered to be susceptible to accrual and so have been recognized as revenues of the current fiscal period. Any other revenue items are considered to be measurable and available only when cash is received by the District.

**D. Assets, liabilities, deferred outflows/inflows of resources, and net position/fund balance**

**1. Cash and cash equivalents**

The District deposits its cash into Jackson County's Local Government Investment Pool (the pool), which is available for use by all County funds and is unrated. The District's share of County pooled cash and investments can be drawn upon demand, and therefore, the entire amount on deposit with the County is considered cash and cash equivalents. Interest earned on deposits in the pool is allocated monthly to each fund based on each fund's portion of the total pool balance calculated on a daily basis.

State statutes authorize the County to invest in the State of Oregon Local Government Investment Pool (LGIP), certificates of deposit, Federal National Mortgage Association (FNMA), Federal Farm Credit Bank (FFCB), Federal Home Loan Bank (FHLB), Federal Home Loan Mortgage Corporation (FHLMC) certificates, municipal debt obligations, corporate paper, and U.S. Government securities held under repurchase agreements. The LGIP operates in accordance with appropriate State laws. Information about the pooled investments, including investment risk, collateral, and insurance coverage, is included in the County's annual financial report and may be obtained by contacting the County's Finance Department at 10 South Oakdale Avenue, Room 314, Medford, Oregon 97501 or by going to [jacksoncounty.org/CAFR](http://jacksoncounty.org/CAFR). It is not practical to determine the investment risk, collateral, or insurance coverage for the District's share of these pool investments.

**2. Receivables**

The District's receivables are property taxes which are collected through the County's property tax system. Property taxes receivable, that have been collected within 60 days of year-end, are considered measurable and available, and are recognized as revenues in the fund financial statements. All other property taxes receivable are offset by deferred inflows and, accordingly, have not been recorded as revenue. Property taxes attach as an enforceable lien as of July 1 for real property and personal property. Taxes are levied on July 1 and payable in three installments on November 15, February 15, and May 15.

**I. Summary of significant accounting policies (continued)**

**D. Assets, liabilities, deferred outflows/inflows of resources, and net position/fund balance**

**3. *Net position and fund balance***

Net position is reported on the Statement of Net Position. The District's net position is restricted. Restrictions are limitations on how the resources may be used. Restrictions may be placed on resources by an external party that provided the resources, by enabling legislation, or by the nature of the asset. In this case, net position of the District is restricted by enabling legislation.

In accordance with GASB Statement No. 54 – *Fund Balance Reporting and Governmental Fund Type Definitions*, the fund balance found on the Balance Sheet is segregated into separate classifications indicating the extent to which the District is bound to honor constraints on the specific purpose for which the funds can be spent. Fund balance classifications are: nonspendable, restricted, assigned or unassigned. Restricted fund balance can be spent only for the specific purposes stipulated by constitution, external resource providers, or through enabling legislation. The District is funded by property tax revenue, which is considered enabling legislation, therefore all of the District's fund balance is classified as restricted.

**E. Estimates**

The preparation of financial statements in conformation with accounting principles generally accepted in the United States of America require management to make estimates and assumptions that affect the amounts reported in the financial statements and accompanying notes. Actual results may differ from those estimates.

**II. Stewardship, compliance, and accountability**

**A. Budgetary information**

The District is required by State law to budget all funds. The Board order authorizing appropriations for each fund sets the level by which expenditures cannot legally exceed appropriations. District funds are controlled by total fund expenditures. The detail budget document, however, is required to contain more specific, detailed information for the above-mentioned expenditure categories. Unexpected additional resources may be added to the budget through the use of a supplemental budget. A supplemental budget requires hearings before the public, publications in newspapers, and approval by the Board of Directors.

Original and supplemental budgets may be modified by the use of appropriation transfers between the levels of control. Such transfers require approval by the Board of Commissioners acting as the Board of Directors of the District. The County Administrator has been assigned authority to make appropriation adjustments within funds without Board approval, provided the total appropriation for a fund is not increased. Appropriations lapse as of year-end. The budget is prepared in accordance with the modified accrual basis of accounting.

**III. Detailed notes on the fund**

**A. Transactions with Jackson County**

The Jackson County Sheriff's Department provides operating management and planning for the District. General administrative functions are also performed by other departments of the County. Administrative services provided by departments in the County's internal service funds are performed on an internal cost reimbursement basis. Reimbursements for internal services were \$312,289 and are included as expenditures of the Community Justice & Safety function on the Statement of Revenues, Expenditures and Changes in Fund Balance.

**B. Risk management**

The District participates in Jackson County's Self Insurance Internal Service fund, which accounts for the District's overall risk of loss. The County is self-insured for unemployment compensation, workers' compensation, most general liability, auto liability, police professional liability, municipal liability exposures, and managers' health benefits. The District pays a portion of the cost through the Sheriff's Department, which is responsible for the operation of the District. The County experienced no claim losses in excess of coverage obtained during fiscal years 2017-18 through 2019-20.

**C. Encumbrances**

Encumbrance accounting, under which purchase orders, contracts and other commitments for the expenditure of monies are recorded in order to restrict that portion of the applicable appropriation, is employed during the year for administrative control purposes only. There were no encumbrances outstanding at year-end.

**D. Tax Abatements**

Jackson County negotiates property tax abatement agreements on an individual basis. The County has tax abatement agreements with twenty entities as of June 30, 2020. Seven of these are located in the White City tax code areas, resulting in a total tax abatement for the District of \$41,045.

**E. Subsequent Events**

As the measures to combat the spread of COVID-19 continue, so does the uncertainty of its impact on the District's financial operations. Therefore, the financial statements have not been adjusted in any way in relation to the effects of COVID-19.

**Report of Independent Auditors Comments  
Required by Oregon State Regulations**

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## **Report of Independent Auditors on Compliance and on Internal Control Over Financial Reporting Based on an Audit of Financial Statements Performed in Accordance with *Oregon Minimum Audit Standards***

Board of Directors  
White City Enhanced Law Enforcement District

We have audited the basic financial statements of the White City Enhanced Law Enforcement District (the District), a component unit of Jackson County, Oregon, as of and for the year ended June 30, 2020 and have issued our report thereon dated December 16, 2020. We conducted our audit in accordance with auditing standards generally accepted in the United States of America and the provisions of the *Minimum Standards for Audits of Oregon Municipal Corporations*, prescribed by the Secretary of State. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the basic financial statements are free of material misstatement.

### **Compliance**

As part of obtaining reasonable assurance about whether the District's basic financial statements are free of material misstatement, we performed tests of its compliance with certain provisions of laws, regulations, contracts, grants, including provisions of Oregon Revised Statutes as specified in Oregon Administrative Rules OAR 162-10-0000 to 162-10-0330, as set forth below, noncompliance with which could have a direct and material effect on the determination of financial statement amounts:

- The use of approved depositories to secure the deposit of public funds.
- The requirements relating to debt.
- The requirements relating to the preparation, adoption and execution of the annual budgets for fiscal years 2020 and 2021.
- The requirements relating to insurance and fidelity bond coverage.
- The appropriate laws, rules and regulations pertaining to programs funded wholly or partially by other governmental agencies.
- The statutory requirements pertaining to the investment of public funds.
- The requirements pertaining to the awarding of public contracts and the construction of public improvements.

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 test disclosed no instances of noncompliance that are required to be reported under *Minimum Standards for Audits of Oregon Municipal Corporations*, prescribed by the Secretary of State.



## **Internal Control over Financial Reporting**

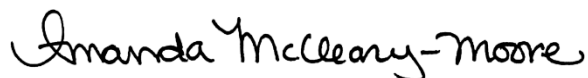
Management of the District is responsible for establishing and maintaining effective internal control over financial reporting. In planning and performing our audit, we considered the District's internal control over financial reporting as a basis for designing our auditing procedures for the purpose of expressing our opinion on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of the District's internal control over financial reporting. Accordingly, we do not express an opinion on the effectiveness of the District's internal control over financial reporting.

*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 over financial reporting was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control over financial reporting that might be deficiencies, significant deficiencies or material weaknesses. We did not identify any deficiencies in internal control over financial reporting that we consider to be material weaknesses, as defined above. However, material weaknesses may exist that have not been identified.

## **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 *Minimum Standards for Audits of Oregon Municipal Corporations*, prescribed by the Secretary of State, in considering the entity's internal control and compliance. Accordingly, this communication is not suitable for any other purpose.



Amanda McCleary-Moore, Partner for  
Moss Adams LLP  
Medford, Oregon  
December 16, 2020