COMMONWEALTH ECONOMIC DEVELOPMENT AUTHORITY
(A COMPONENT UNIT OF THE COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS)

FINANCIAL STATEMENTS, ADDITIONAL INFORMATION AND INDEPENDENT AUDITORS' REPORT

YEAR ENDED SEPTEMBER 30, 2021
(with comparative figures for September 30, 2020)

BURGER COMER & ASSOCIATES
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COMMONWEALTH ECONOMIC DEVELOPMENT AUTHORITY
(A Component Unit of the Commonwealth
of the Northern Mariana Islands)

Financial Statements

Year Ended September 30, 2021
(with comparative figures for September 30, 2020)

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BURGER · COMER & ASSOCIATES
CERTIFIED PUBLIC ACCOUNTANTS

INDEPENDENT AUDITOR'S REPORT

To the Board of Directors
Commonwealth Economic Development Authority

Report on the Financial Statements

We have audited the accompanying financial statements of the Commonwealth Economic Development Authority (CEDA) a component unit of the CNMI government, which comprise the statement of net position as of September 30, 2021 and the related statements of revenues, expenses and changes in net position and of cash flows for the year then ended and the related notes to the financial statements.

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 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.

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We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion.

Opinions

In our opinion, the financial statements referred to above present fairly, in all material respects, the respective financial position of the Commonwealth Economic Development Authority (CEDA) as of September 30, 2021 and the respective changes in net position and cash flows for the year then ended in accordance with accounting principles generally accepted in the United States of America.

Emphasis of Matter

We draw attention to Note 13, which discloses the economic uncertainties that have arisen as a result of the declared outbreak of a coronavirus (COVID-19) pandemic by the World Health Organization. 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 4 through 13 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 Reporting Required by *Government Auditing Standards*

In accordance with *Government Auditing Standards*, we have also issued our report dated June 21, 2024, on our consideration of the CEDA'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 the effectiveness of the CEDA’s 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 the CEDA's internal control over financial reporting and compliance.

Burger Comer & Associates

Saipan, Commonwealth of the Northern Mariana Islands
June 21, 2024

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Management's Discussion and Analysis

Year Ended September 30, 2021

The Management's Discussion and Analysis of the Commonwealth Economic Development Authority's (CEDA) financial performance provides an overview of CEDA's financial activities for the fiscal year ended September 30, 2021, with selected comparative information for the fiscal year ended September 30, 2020. Please read it in conjunction with the more detailed information contained within the accompanying financial statements.

CEDA, formerly known as the Economic Development Loan Fund, was established as an autonomous public agency in 1985 through Public Law 4-49. Its overall purpose is to stimulate economic development in the Commonwealth of the Northern Mariana Islands (CNMI). Its mission statement is to provide appropriate financial and technical assistance to facilitate the start-up or expansion of private and public enterprises for their success, the benefit of the CNMI's economic welfare and the long-term sustainability of CEDA. CEDA's functions are carried out through the Development Banking Division (DBD) and the Development Corporation Division (DCD). Additionally, in 1994, the Northern Marianas Housing Corporation (NMHC) was included in CEDA. CEDA, as the financing arm of the CNMI, successfully continues its role to stimulate the CNMI's economy by financing major capital improvements and investing in its people. CEDA has a Board of Directors composed of seven individuals appointed for staggered four-year terms by the Governor of the CNMI. CEDA maintains its main office in Saipan and branch offices in Rota and Tinian.

DBD AND DCD

DBD generally engages in government and public sector activities while DCD engages in private sector activities. Additionally, on December 1, 2000, CEDA was given administrative authority over the Qualifying Certificate Program (QC). The QC is a tax incentive program to encourage new investment in the CNMI.

DCD's mission is to initiate, stimulate and facilitate development of the economy in the CNMI for the economic and social advancement of the people of the CNMI by granting loans, loan guarantees and providing financial, technical and advisory assistance to the private sector in the CNMI.

DCD's primary activity relates to the servicing of its direct loan portfolio. As of September 30, 2021 and 2020, DCD's net loans receivable was $7,777,461 and $7,220,565.

DBD maintains a portfolio consisting of loans to various governmental and quasi-governmental agencies of the CNMI government.

DBD AND DCD, CONTINUED

In August 2016, CEDA and the Commonwealth Utilities Corporation (CUC) entered into a Settlement Agreement directing CUC to assign the payment it receives from the Public School System (PSS) Settlement Agreement and to pay the remaining difference of $478,798 to CEDA. CUC further agrees to make quarterly dividend payments of $270,000 to CEDA beginning on October 1, 2016. As of September 30, 2021 and 2020, CEDA received total dividend payments of $9,720,000 and $8,100,000 from CUC. DBD continues to hold preferred stock in CUC based on the conversion of debt dated September 30, 2009. See note 8 to the financial statements for more detailed information. The conversion has permitted CUC to move ahead with greater flexibility in obtaining financing and has given CEDA the opportunity to receive funds loaned to CUC through dividends on the preferred stock, which will be recorded in the Revolving Fund for CIP projects.

As stated earlier, the net value of DCD's loan portfolio after recoveries was $7,777,461 in 2021 and $7,220,565 in 2020. These figures represent the estimated change in the provision for loan allowance and the potential recovery of value of loans and accrued interest for the respective fiscal years. Increases in fiscal years 2021 and 2020's net loans receivable was due to an increase in the number of approved microloan borrowers, the launching of a new commercial loan program of up to $250,000, respectively, loan consolidations and the restructuring and capitalization of accrued interest.

The CEDA Board of Directors has allowed management greater flexibility in pursuing solutions to the high delinquency rate among CEDA borrowers and continues to emphasize the need to work with clients, or within the judicial system when necessary, to resolve delinquent loans.

In response to the difficulties experienced by virtually all of DCD's borrowers, management has been working on solutions that can benefit both CEDA and the borrowers. One such solution is the Debt-Relief Program. Qualifying borrowers are encouraged to restructure their delinquent loans at new, less-burdensome interest rates (typically 2%) and the accrued interest is set aside so that the new loan has a chance of being fully amortized if the new payment schedule is adhered to. This gives borrowers who were previously in seemingly hopeless situations new hope for paying off their loans and retaining possession of their collateral. While CEDA may potentially lose some of the accrued interest that has been set aside, the reality is that this accrued interest would likely have never been recovered if the original loan terms had not been modified.

In cases where borrowers are in default, CEDA has exhausted all possible means to collect and there is no workable solution for repayment of the loan, CEDA has been forced to write-off loans.

FINANCIAL HIGHLIGHTS

Combined Statements of Net Position
As of September 30, 2021 and 2020

	2021	2020
Current assets	$ 13,904,310	$ 16,110,789
Other assets	14,131,909	12,539,587
Capital assets, net	810,366	860,569
Foreclosed real estate, net	1,506,443	1,506,443
Noncurrent assets	14,302,725	12,871,266
Total assets	44,655,753	43,888,654
Current Liabilities	6,683,619	6,104,715
Noncurrent Liabilities	575,557	505,432
Total Liabilities	7,259,176	6,610,147
Deferred inflows of resources	-	-
Net position:		
Net investment in capital assets	810,366	860,569
Restricted	36,586,211	36,417,938
Total net position	37,396,577	37,278,507
Total Liabilties, deferred inflows of resources and net position	$ 44,655,753	$ 43,888,654

FINANCIAL HIGHLIGHTS, CONTINUED

Combined Statements of Revenues, Expenses and Changes in Net Position
Years Ended September 30, 2021 and 2020

	2021	2020
Operating revenues	$ 890,363	$ 1,398,299
Recoveries (bad debts)	44,503	(52,258)
Net operating revenues	934,866	1,346,041
Operating expenses	1,573,834	1,483,587
Operating (loss) income	(638,968)	(137,546)
Total nonoperating revenues, net	876,166	698,008
Income before transfers and capital contributions	237,198	560,462
Contributions for capital development grants	(119,128)	74,455
Change in net position	118,070	486,007
Net position- beginning	37,278,507	36,792,500
Net position- ending	$ 37,396,577	$ 37,278,507

Combined Statements of Cash Flows
Years Ended September 30, 2021 and 2020

	2021	2020
Cash flows from operating activities	$ (43,051)	$ (379,431)
Cash flows from capital and related financing activities	(988,399E)	(5,720,911)
Cash flows from investing activities	(4,485,353)	14,206,756
Net increase (decrease) in cash and cash equivalents	(5,516,803)	8,106,414
Cash and cash equivalents at beginning of the year	10,216,253	2,109,839
Cash and cash equivalents at end of year	$ 4,699,450	$ 10,216,253

FINANCIAL HIGHLIGHTS, CONTINUED
Condensed Comparative Statements of Revenues, Expenses and Changes in Net Position by Division
Years Ended September 30, 2021 and 2020

Development Banking Division

	2021	2020
Operating revenues:		
Interest and fees on loans	$ -	$ -
Interest and dividends on investments	10,984	186,191
Other	-	-
Net operating revenues	10,984	186,191
Other operating expenses	326,289	145,418
Operating income (loss)	(315,305)	40,773
Nonoperating revenues (expenses):		
Dividend income	900,000	900,000
Other income	-	-
Interest expense	-	-
Total nonoperating revenues, net	900,000	900,000
Income before transfers	584,695	940,773
Contributions for capital development grants	(119,128)	(74,455)
Change in net position	$ 465,567	$ 866,318

FINANCIAL HIGHLIGHTS, CONTINUED

Condensed Comparative Statements of Revenues, Expenses and Changes in Net Position by Division

Years Ended September 30, 2021 and 2020

Development Corporation Division

	2021	2020
Operating revenues:		
Interest and fees on loans	$ 271,572	$ 639,754
Interest and dividends on investments	12,863	191,365
Other	594,944	380,989
	879,379	1,212,108
(Bad debts) recoveries	44,503	(52,258)
Net operating revenues	923,882	1,159,850
Operating expenses:		
Salaries and wages	611,214	635,061
Employee benefits	315,055	351,925
Repairs and maintenance	22,788	-
Utilities	40,236	-
Professional fees	76,496	59,997
Office rent	17,342	5,567
Travel	9,014	31,318
Depreciation	59,251	57,777
Other	96,149	196,524
Total operating expenses	1,247,545	1,338,169
Operating (loss) income	(323,663)	(178,319)
Nonoperating revenues (expenses):		
Other income	550	450
Gain on sale of fixed assets	-	10
Other expenses	(24,384)	(202,432)
Total nonoperating revenues (expenses), net	(23,834)	(201,972)
Change in net position	$ (347,497)	$ (380,291)

FINANCIAL HIGHLIGHTS, CONTINUED

Condensed Comparative Statements of Cash Flows by Division
Years Ended September 30, 2021 and 2020

Development Banking Division

	2021	2020
Cash flows from operating activities	$ 10,984	$ 186,011
Cash flows from capital and related financing activities	(525,631)	(6,142,767)
Cash flows from investing activities	514,647	5,956,756
Net change in cash and cash equivalents	-	-
Cash and cash equivalents at beginning of year	-	-
Cash and cash equivalents at end of year	$ -	$ -

Development Corporation Division

	2021	2020
Cash flows from operating activities	$ (507,398)	$ (565,442)
Cash flows from capital and related financing activities	(9,405)	421,856
Cash flows from investing activities	(5,000,000)	8,250,000
Net change in cash and cash equivalents	(5,516,803)	8,106,414
Cash and cash equivalents at beginning of year	10,216,253	2,109,839
Cash and cash equivalents at end of year	$ 4,699,450	$ 10,216,253

FINANCIAL HIGHLIGHTS, CONTINUED

DCD AND DBD

- In 2021, DCD and DBD had net operating revenues of $923,882 and $10,984, respectively. A significant part of DCD's net operating revenues was due to interest and fees collected from loans and investment returns while DBD's net operating revenues resulted from investment returns. DCD had an addition (reduction) to the allowance of ($44,503) and $52,258 in 2021 and 2020. Interest and fees earned on loans for DCD decreased by $257,273 in fiscal year 2021 due to lower revenue received from auctions of foreclosed assets, increased by $510,345 in fiscal year 2020 due to revenue received from auctions of foreclosed assets, decreased by $440,210 or 77% in fiscal year 2019 due to deferment of loan payments extended to CDA borrowers and increased by $166,135 or 41% in fiscal year 2018. DBD had no outstanding loans receivable in fiscal year 2021 and 2020. Interest and fees earned on loans for DBD decreased by $39,731 or 42% in fiscal year 2019 and by $6,818 or 7% in fiscal year 2018.

- DCD invested surplus funds in time certificates of deposit (TCDs) to take advantage of higher interest rates. Related earnings on investments decreased from $191,365 for the year ended September 30, 2020 to $12,863 for the year ended September 30, 2021, and from $46,802 for the year ended September 30, 2018 to $74,008 for the year ended September 30, 2019, an decrease of $27,206 or 58%. DBD also invested in TCDs due to the continued decline of interest earned on savings deposits. Earnings on interest and dividends on investments decreased from $186,191 for the year ended September 30, 2020 to $10,984 for the year ended September 30, 2021.

- In fiscal year 2021, operating expenses for DCD decreased by $ 90,624 from 2020. In fiscal year 2020, operating expenses for DCD decreased by $55,292 or 4% from 2019. In fiscal year 2019, operating expenses for DCD decreased by $49,194 or 3% from 2018. DBD's operating expenses decreased by $88,411 or 38% from 2019 and by $18,462 or 7% from fiscal year 2018. Efforts of management and staff are ongoing to reduce DCD's expenses. DBD's expenses were due to reimbursements paid to DCD to cover shared costs.

- CEDA management and staff are constantly reaching out to distressed borrowers by working closely with loan clients, finding innovative ways to restore their loans to "performing" status and pursuing realization of value from collateralizing assets for loans that have no hope of recovery.

- DBD and DCD's combined change in net position decreased by $ 367,937 from 2020 to 2021 and DBD and DCD's combined change in net position decreased by $206,680 or 30%, from 2019 to 2020 due to zero recoveries reported in 2020 and increased by $1,876,336 or 159% from 2018 to 2019 due to several adjustments in valuation allowances.

FINANCIAL HIGHLIGHTS, CONTINUED

DCD AND DBD, CONTINUED

- In fiscal years 2021 and 2020, DCD began lending up to $450,000 and $250,000, respectively, for its new direct loan program for renovations and repairs of existing rental properties.

- In fiscal year 2020, CEDA's Board of Directors approved an automatic eight-month loan payment deferral for all CEDA borrowers, a three-month lease payment deferral for all leases and a fifty percent discount for three months in rent from CEDA's building tenants to support the relief and recovery of businesses affected by the economic impact of the COVID-19 coronavirus pandemic.

- CEDA received total preferred stock dividend payments of $1,620,000 and $540,000 in fiscal years 2021 and 2020, respectively. As of September 30, 2021 and 2020, CEDA received total preferred stock dividend payments of $9,720,000 and $8,100,000, respectively, from CUC since implementation of the Settlement Agreement.

CAPITAL ASSETS

At September 30, 2021 and 2020, CEDA had $810,366 and $860,569, respectively, of net investment in capital assets. This represents a net decrease of $50,203 or 6% during fiscal year 2021 and of $269,717 or 3% during fiscal year 2020.

	2021	2020
Depreciable capital assets, net	$ 626,018	$ 676,221
Non-depreciable capital assets	184,348	184,348
	$ 810,366	$ 860,569

See note 8 to the financial statements for more detailed information on CEDA's capital assets and changes therein.

ECONOMIC OUTLOOK

DCD AND DBD

CEDA is affected by the negative economic forces at play globally as well as locally. The CNMI has long been regarded as pro-business thanks to a favorable tax climate, relatively affordable housing and a variety of incentives that encourages new business formation and development. The CNMI's economic resiliency was also tested when it was able to recover quickly from two major natural disasters. The CNMI's dependency on tourism as a main economic driver is also very vulnerable due to stiff competition from other major destinations that have bigger marketing budgets as well as the sensitivity of the tourism market from geopolitics that are at play globally. The effect of the ongoing trade war between the United States and China and the global impact of the COVID-19 coronavirus pandemic in health, economy and tourism has not spared the CNMI which brought the CNMI's economic activity to a near stand-still as countries around the world imposed tight restrictions on movement to contain the spread of the virus.

CEDA's biggest challenge in the past was funding its operations from earnings generated from its loan portfolios and investments. Management addressed this problem through a combination of revenue enhancements and diversifications and expenditure reductions. CEDA continues to find innovative ways to assist existing borrowers. CEDA also offers finance leases with an option to purchase on some of its properties in a move that will not only recover the principal balance but also will offload its property inventory acquired from foreclosures. CEDA also offers a Debt-Relief Program to bring qualified borrowers from a delinquent, non-paying status to a performing, paying status. The "price" to CEDA of this program is to reduce the interest rate on these loans to 2%, which does not go far in generating income for CEDA. However, management believes that if enough of the delinquent borrowers see hope of paying off their loans and preserving their collateral, they will begin to make regular payments.

CONTACTING CEDA MANAGEMENT

This financial report is designed to provide a general overview of CEDA's financial condition and to demonstrate its accountability for monies received. If you have questions about this report or need additional financial information, contact Mr. Derek T. Sasomoto, CEDA Comptroller, P.O. Box 502149, Saipan, MP 96950-2149, or call (670) 234-6245 or email d.sasamoto@developcnmi.com.

COMMONWEALTH ECONOMIC DEVELOPMENT AUTHORITY
(fka: Commonwealth Development Authority)

Statement of Net Position
September 30, 2021
(With comparative figures for September 30, 2020)

ASSETS		2021	2020
Current assets:			
Cash and cash equivalents	$	4,699,450	10,216,253
Time certificates of deposit		7,750,000	2,750,000
Receivables:			
Current portion of loans receivable, net		132,735	1,066,279
Current portion of finance lease receivable, net		59,286	104,111
Rent, net		52,920	50,857
Accrued interest, net of allowance for doubtful accounts of $647,924 and $652,195 as of September 30, 2021 and 2020, respectively		65,156	57,747
Dividends		1,080,000	1,800,000
Other, net		55,694	56,105
Prepaid expenses		9,069	9,437
Total current assets		13,904,310	16,110,789
Other assets:			
Cash and cash equivalents, restricted		11,631,909	6,039,587
Time certificate of deposit, restricted		2,500,000	6,500,000
Total other assets		14,131,909	12,539,587
Noncurrent assets:			
Loans receivable, net of current portion		7,644,726	6,154,286
Finance lease receivable, net of current portion		657,999	716,980
Due from CNMI government		6,000,000	6,000,000
Depreciable capital assets, net of accumulated depreciation		626,018	676,221
Nondepreciable capital assets		184,348	184,348
Foreclosed real estate, net		1,506,443	1,506,443
Total noncurrent assets		16,619,534	15,238,278
	$	44,655,753	43,888,654
LIABILITIES, DEFERRED INFLOWS OF RESOURCES AND NET POSITION			
Current liabilities:			
Accounts payable and accrued expenses	$	1,235,674	1,148,385
Unearned revenues, current portion		15,094	13,530
Loan commitment		5,432,851	4,942,800
Total current liabilities		6,683,619	6,104,715
Unearned revenues, net of current portion		575,557	505,432
Total liabilities		7,259,176	6,610,147
Commitments and contingencies			
Net position:			
Net investment in capital assets		810,366	860,569
Restricted		36,586,211	36,417,938
Total net position		37,396,577	37,278,507
	$	44,655,753	43,888,654

See accompanying notes to financial statements.

COMMONWEALTH ECONOMIC DEVELOPMENT AUTHORITY
(fka: Commonwealth Development Authority)

Statement of Revenues, Expenses and Changes in Net Position
Year Ended September 30, 2021
(With comparative figures for the year ended September 30, 2020)

		2021	2020
Operating revenues:			
Interest and fees on loans	$	271,572	639,754
Interest and dividends on investments		23,847	377,556
Other		594,944	380,989
		890,363	1,398,299
Recovery of loan impairment		52,860	(52,713)
Recovery of (provision for) interest impairment		(8,357)	455
Net operating revenues		934,866	1,346,041
Operating expenses:			
Salaries and wages		611,214	635,061
Employee benefits		315,055	351,925
Repairs and maintenance		22,788	19,873
Utilities		40,236	38,328
Depreciation		59,251	57,777
Professional fees		76,496	59,997
Travel		9,014	31,318
Rent		17,342	5,567
Other		422,438	283,741
Total operating expenses		1,573,834	1,483,587
Operating loss		(638,968)	(137,546)
Nonoperating revenues (expenses):			
Dividend income		900,000	900,000
Other income		550	450
Gain on sale of capital assets		-	(10)
Other expense		(24,384)	(202,432)
Nonoperating revenues, net		876,166	698,008
Income before transfers and capital contributions		237,198	560,462
Contributions for capital development grants		(119,128)	(74,455)
Change in net position		118,070	486,007
Net position - beginning		37,278,507	36,792,500
Net position - ending	$	37,396,577	37,278,507

See accompanying notes to financial statements.

COMMONWEALTH ECONOMIC DEVELOPMENT AUTHORITY
(fka: Commonwealth Development Authority)

Statement of Cash Flows
Year Ended September 30, 2021
(With comparative figures for the year ended September 30, 2020)

		2021	2020
Cash flows from operating activities:			
Cash received from interest and fees on loans receivable	$	264,163	594,890
Interest and dividends on investments		23,967	377,556
Cash payments to suppliers for goods and services		(69,759)	(269,040)
Cash received from customers		2,304	(1,227)
Cash payments to employees for services		(753,777)	(855,487)
Cash received for loan commitment		490,051	(226,123)
Net cash used for operating activities		(43,051)	(379,431)
Cash flows from capital and related financing activities:			
Acquisition of capital assets		(9,048)	(91,204)
Proceeds from sale of foreclosed real estate		-	-
Net receipts of loans receivable		(512,393)	(79,607)
Net receipts of finance lease receivable		139,139	298,226
Transfers for capital development grants		(119,128)	(74,455)
Due from CNMI government		-	(6,000,000)
Proceeds from sale of fixed assets		-	(10)
Transfers for loan commitment		(486,969)	226,139
Net cash (used for) provided by capital and related financing activities		(988,399)	(5,720,911)
Cash flows from investing activities:			
Proceeds from (purchase of) restricted cash and cash equivalents and time certificates of deposits		(6,105,353)	13,666,756
Dividend received		1,620,000	540,000
Interest received		-	-
Net cash provided by (used for) investing activities		(4,485,353)	14,206,756
Net increase (decrease) in cash and cash equivalents		(5,516,803)	8,106,414
Cash and cash equivalents at beginning of year		10,216,253	2,109,839
Cash and cash equivalents at end of year	$	4,699,450	10,216,253
Reconciliation of operating (loss) income to net cash used for operating activities:			
Operating (loss) income	$	(638,968)	(137,546)
Adjustment to reconcile operating (loss) income to net cash used for operating activities:			
Provision for (recovery of) loan impairment		(52,860)	52,713
Provision for interest impairment		8,357	-
Depreciation		59,251	57,777
Finance lease revenue		(35,333)	(29,548)
Other		(23,834)	(201,982)
(Increase) decrease in assets:			
Receivables:			
Rent		(2,063)	1,400
Finance lease		-	-
Employees		-	-
Accrued interest		(7,409)	(45,319)
Other		411	24,210
Prepaid expense		368	31,058
Increase (decrease) in liabilities:			
Accounts payable and accrued expenses		87,289	114,307
Unearned revenues		71,689	(20,378)
Loan commitment		490,051	(226,123)
Net cash used for operating activities	$	(43,051)	(379,431)

See accompanying notes to financial statements.

(1) Reporting Entity

The Commonwealth Economic Development Authority (CEDA), formerly the Commonwealth Development Authority, a component unit of the Commonwealth of the Northern Mariana Islands (CNMI), was created as an autonomous public agency of the CNMI pursuant to Public Law 4-49 as amended by Public Laws 4-63, 5-27 and 22-01. CEDA is affiliated with all other component units of the CNMI Government. CEDA's existence is to be perpetual and it shall have all the rights and privileges of a corporation. The purpose of CEDA is to stimulate the economic development of the CNMI.

The functions of CEDA have been carried out through a Development Banking Division (DBD, government and public sector activities), a Development Corporation Division (DCD, private sector activities), Northern Marianas Housing Corporation (NMHC). NMHC, formerly the Mariana Islands Housing Authority (MIHA), was established to assist in the development and administration of low-cost residential housing in the Northern Mariana Islands. MIHA was empowered to provide low-cost residential housing and employment through the construction, maintenance, and repair of such housing. On October 20, 1994, Executive Order 94-3 became effective which abolished MIHA and all of its functions, assets and liabilities were transferred to CEDA. CEDA established NMHC as a division to account for the operations, assets and liabilities of MIHA. NMHC is governed by a seven-member Board of Directors appointed by the Board of Directors of CEDA. On September 24, 2020, the Governor of the CNMI signed Executive Order 2020-21 to rescind Section 407 of Executive Order 94-3, pertaining to the functions of NMHC and its assignment to CEDA and allowing for NMHC to remain the successor agency to MIHA pursuant to Public Law 20-87. Pursuant to the Executive Order 2020-21, the NMHC is no longer a division of CEDA effective September 24, 2021.

The purpose and functions of the two remaining divisions are as follows:

DBD:

- To receive and hold United States economic assistance for economic development loans provided under Section 702(c) of the Covenant to Establish a Commonwealth of the Northern Mariana Islands in Political Union with the United States of America (the Covenant):

- To aid in the financing of capital improvement projects and other projects undertaken by the CNMI and its autonomous public agencies;

- To achieve the greatest possible return, in terms of economic development, on the funds made available to the CNMI by the United States in accordance with the Covenant; and on such other funds as may be made available to CEDA as capital contributions;

- To disseminate modern practices and techniques of financing, management and business administration in order to raise the levels of efficiency and productivity in all sectors; and

(1) Reporting Entity, continued

- To serve as the Northern Marianas development bank identified in Article IX, Section 6(c) of the Constitution.

As such, DBD considers all its net position restricted for such purposes.

DCD:

- To identify, formulate, initiate, stimulate and facilitate business and commercial enterprises, with special emphasis on agricultural and marine resources, manufacturing and processing activities, import substitution, export development and responsible use of indigenous raw materials;

- To identify, formulate, initiate, stimulate and facilitate business and commercial enterprises where a service necessary and vital to economic development is required, or where profit incentives are not sufficient to attract private sector investors: and

- To serve as the economic development loan fund agency for qualified private sector enterprises.

As such, DCD considers all its net position, except net investment in capital assets, to be restricted for such purposes. DCD also administers the State Small Business Credit Initiative (SSBCI) loan program funded by the U.S. Department of Treasury through the CNMI and CEDA serves as the disbursing agent as well as performs loan documentation preparation. The loans are not reflected in the accompanying financial statements.

(2) Summary of Significant Accounting Policies

The accounting policies of CEDA conform to accounting principles generally accepted in the United States of America, as applicable to governmental entities, specifically proprietary funds. CEDA utilizes the flow of economic resources measurement focus. The Governmental Accounting Standards Board (GASB) is the accepted standard-setting body for establishing governmental accounting and financial reporting principles.

Basis of Accounting

All proprietary funds are accounted for on a flow of economic resources measurement focus. With this measurement focus, all assets and liabilities associated with the operation of this fund are included on the statements of net position. Proprietary fund operating statements present increases (e.g. revenues) and decreases (e.g. expenses) in net position. The accrual basis of accounting is utilized by proprietary funds. Under this method, revenues are recorded when earned and expenses are recorded at the time liabilities are incurred.

(2) Summary of Significant Accounting Policies, continued

Budgets

In accordance with Public Law 3-68, the Planning and Budgeting Act of 1983, CEDA submits an annual budget to the CNMI Office of the Governor.

Cash and Cash Equivalents and Time Certificates of Deposit

For purposes of the statements of net position and of cash flows, cash and cash equivalents is defined as cash held in demand deposits, savings and unrestricted time certificates of deposit with a maturity date within three months of the date acquired. Deposits maintained in time certificates of deposit with original maturity dates greater than ninety days are separately classified. At September 30, 2021 and 2020, total cash and cash equivalents and time certificates of deposit were $26,581,359 and $25,505,840, respectively, and the corresponding bank balances were $26,566,055 and $25,037,979, respectively, which are maintained in financial institutions subject to Federal Deposit Insurance Corporation (FDIC) insurance. Bank deposits in the amount of $500,000 were FDIC insured as of September 30, 2021 and 2020.

CNMI law does not require component units to collateralize their bank accounts and thus CEDA's deposits in excess of FDIC insurance are uncollateralized.

Prepaid Expenses

Payments made to vendors for services that will benefit future periods are recorded as prepaid expenses.

Capital Assets

Capital assets are recorded at cost. Depreciation is provided by using the straight-line method over the estimated useful lives of the assets. Current policy is to capitalize items in excess of $500.

Long-lived assets for which management has committed to a plan to dispose of the assets, whether by sale or abandonment, are reported at the lower of carrying amount or fair value less costs to sell.

(2) Summary of Significant Accounting Policies, continued

Land

Land is recorded at fair market value at the date of acquisition. Valuations are periodically performed by management and adjustments are made to reflect the land at the lower of the carrying amount or fair market value. The carrying amount of the land is evaluated on an annual basis to determine impairment by estimating the recoverable value. Recoverable value is based on management's historical knowledge and changes in market conditions from the time of valuation. An impairment loss is recognized in the period in which it arises.

Foreclosed Real Estate

Real estate properties acquired through, or in lieu of, loan foreclosure are to be sold and are initially recorded at fair value at the date of foreclosure less estimated selling costs establishing a new cost basis. Valuations are periodically performed by management and adjustments are made to reflect the real estate at the lower of the carrying amount or fair value less estimated costs to sell. Operating expenses or income, reductions in estimated values, and gains or losses on disposition of such properties are charged to current operations.

Loans Receivable, Interest Receivable and Allowance for Loan Losses

Loans and interest receivable are stated at the amount of unpaid principal and interest, reduced by an allowance for loan losses. Interest on loans is calculated by using the simple interest method on daily balances of the principal amount outstanding. The allowance for loan losses is established through a provision for doubtful accounts charged to expense. Loans are charged against the allowance for loan losses when management believes that the collection of the principal is unlikely. The allowance is an amount that management believes will be adequate to absorb possible losses on existing loans that may be uncollectible, based on evaluations of the collectability of loans and prior loan loss experience. The evaluations take into consideration such factors as changes in the nature and volume of the loan portfolio, overall portfolio quality, review of specific problem loans and current economic conditions that may affect the borrowers' ability to pay.

Finance Lease Receivables

Finance lease receivables are carried at the aggregate of lease rental receivable less unearned finance lease income. Unearned finance lease income is amortized on a straight-line basis over the lease term.

(2) Summary of Significant Accounting Policies, continued

Other Receivable

U.S. Department of Agriculture Rural Development (USDA RD) defaulted loans receivable is recorded at its purchase price or the real property's fair value less cost to sell. Other receivables are stated at the amount of unpaid balances.

Restricted Cash and Cash Equivalents and Time Certificates of Deposit

As described in note 1, DBD receives and holds United States economic assistance for economic development loans provided under Section 702(c) of the Covenant. The Agreement of the Special Representatives on Future United States Financial Assistance for the Northern Mariana Islands requires that a revolving fund be established into which repayments of principal and interest from revenue-producing projects shall be deposited for financing of additional revenue-producing capital development projects. From its inception on October 1, 1985, DBD has exclusively accounted for Covenant 702(c) funding and thus represents the required revolving fund.

As described in note 1, DCD serves as the economic development loan fund agency for qualified private sector enterprises. DCD accounts for all funds received by the former Northern Mariana Islands Economic Development Loan Fund pursuant to Article VII, Section 702(c) of the Covenant from February 15, 1975 through September 30, 1985. In addition to the aforementioned financial resources, DCD has been designated as the administrative agency for economic development loans transferred from the Trust Territory of the Pacific Islands government to the CNMI. DCD represents a revolving fund to account for economic development loans to qualified private sector enterprises.

Revenue Recognition

Operating revenues include all direct revenues such as interest and fees on loans, administrative fee, federal grants and interest on investments.

Interest on loans is calculated by using the simple interest method on daily balances of the principal amount outstanding. Interest on loans is accrued and credited to income based on the principal amount outstanding for both performing and nonperforming loans. DCD recognizes interest income on nonperforming loans based on management's assessment of collectability.

Non-operating revenues primarily result from capital and financing activities and from forgiveness of debt.

(2) Summary of Significant Accounting Policies, continued

Unearned Revenues

Unearned revenue is recognized when cash, receivables or other assets are recorded prior to being earned. Unearned revenue includes the following major components. Unearned revenue of DCD represents prepaid lease income on foreclosed real estate held for lease of $590,651 and $518,962 as of September 30, 2021 and 2020, respectively. Amounts to be recognized over the terms of the leases are as follows:

Year ending September 30,	Lease Recognition
2022	$ 15,094
2023	15,066
2024	15,066
2025	15,066
2026	15,066
2027 – 2031	69,186
2032 – 2036	69,186
2036 – 2041	69,186
2042 – 2046	69,186
2047 – 2051	69,186
2052 – 2056	60,649
2057 – 2061	56,485
2062 – 2066	52,229
	$ 590,651

Loan Commitments

Loan commitments are funds received from the CNMI for the SSBCI cash collateral support program deposited in a financial institution subject to FDIC coverage and funds for loans approved and not yet disbursed at year end. Loan commitment funds as of September 30, 2021 and 2020 were $5,256,962 and $4,784,299 respectively. In addition, DCD recorded SSBCI Loan Participation Program funds received from a financial institution of $175,889 and $158,501 as of September 30, 2021 and 2020, respectively.

Compensated Absences

Vested or accumulated vacation leave is recorded as benefits accrue to employees. No liability is recorded for nonvesting accumulating rights to receive sick pay benefits. Accumulated sick pay benefits as of September 30, 2021 and 2020 approximated $615,589 and $610,689, respectively.

(2) Summary of Significant Accounting Policies, continued

Retirement Plan

CEDA contributed to the Northern Mariana Islands Retirement Fund's (NMIRF) defined benefit plan (DB Plan), a cost-sharing, multiple-employer plan established and now administered by the CNMI. On September 30, 2013, the DB Plan was transferred to the Northern Mariana Islands Settlement Fund (NMISF). CEDA also contributes to a defined contribution plan (DC Plan).

On August 30, 2012, Public Law 17-79 was enacted to amend Title I of the Commonwealth Code to include the intent of the CNMI to participate in the retirement insurance system established by Title I of the U.S. Federal Insurance Contributions Act (FICA) and for participation to be extended to elected officials, employees, political subdivisions and instrumentalities of the CNMI. On September 11, 2012, Public Law 17-82 *CNMI Pension Reform Recovery Act of 2012* was enacted. Unless specifically exempted or authorized by federal law, Public Law 17-82 provides for mandatory membership of CNMI Government employees and elected officials in the U.S. Social Security system and authorizes employees, who elect to, to buy quarters of service in the U.S. Social Security system from contributions made to the DB plan. In addition, Public Law 17-82 provides active and inactive DB Plan members the option to voluntarily terminate membership in the DB Plan, withdraw or roll over contributions to the DC Plan and to participate in the U.S. Social Security system without termination of employment or penalty. Further, Public Law 17-82 allows the CNMI Government to continue remitting its 4% employer contribution to the DC Plan unless the employee ceases to contribute its employee share.

On March 11, 2013, Public Law 18-02 was enacted to amend Public Law 17-82 to clarify those provisions necessary to expedite the refunds and to prevent any further frustration of the process. Included in the public law is the amendment of Section 203(a) of Title 1, Division 8, Part 3, which states that the government obligation to withhold and remit the employee's portion to the employee's defined account shall continue with respect to employees who do not terminate membership in the DB Plan. All but four active CEDA employees voluntarily terminated membership in the DB Plan and CEDA contributed $159,777 and $162,323 to the DB Plan during the years ended September 30, 2021 and 2020, respectively.

Defined Contribution Plan (DC Plan)

On June 16, 2006, Public Law No. 15-13 was enacted which created the DC Plan, a multi-employer pension plan and is the single retirement program for all employees whose first time CNMI government employment commences on or after January 1, 2007. Each member of the DC Plan is required to contribute to the member's individual account an amount equal to 10% of the member's compensation. CEDA is required to contribute to each member's individual account an amount equal to 4% of the member's compensation. CEDA recorded DC contributions for the years ended September 30, 2021 and 2020 were $4,130 and $4,768, respectively, equal to the required contributions for each year.

(2) Summary of Significant Accounting Policies, continued

Defined Contribution Plan (DC Plan), continued

Members of the DC Plan, who have completed five years of government service, have a vested balance of 100% of both member and employer contributions plus any earnings thereon.

Net Position

CEDA's net position is classified as follows:

- Net investment in capital assets; capital assets, net of accumulated depreciation.

- Restricted:

  Nonexpendable - Net position subject to externally imposed stipulations that CEDA maintain them permanently. At September 30, 2021 and 2020, CEDA does not have nonexpendable net position.

  Expendable - Net position whose use by CEDA is subject to externally imposed stipulations that can be fulfilled by actions of CEDA pursuant to those stipulations or that expire by the passage of time. As described in note 1, CEDA considers all net position, except net investments in capital assets, to be restricted for economic development.

- Unrestricted; Net position that is not subject to externally imposed stipulations. As CEDA considers all net position, except net investments in capital assets, to be restricted for economic development, CEDA does not have unrestricted net position of September 30, 2021 and 2020.

GASB Statement No. 68

In June 2012, GASB issued Statement No. 68, *Accounting and Financial Reporting for Pensions* and in November 2013, GASB issued Statement No. 71, *Pension Transition for Contributions Made Subsequent to the Measurement Date - an amendment of GASB Statement No. 68*, which revised and established new financial reporting requirements for most governments that provided their employees with pension benefits through plans that are administered through trusts. Management has determined that the CNMI is legally responsible for making contributions to NMISF as a non-employer entity and that net pension obligations are allocated in total to the NMISF. Management acknowledges the requirement to recognize revenue in an amount equal to the non-employer contributing entities' (CNMI) total proportionate share of the collective pension expense that is associated with CEDA. CEDA has not recorded related revenues and pension expense for the years ended September 30, 2021 and 2020 as amounts were not available.

(2) Summary of Significant Accounting Policies, continued

New Accounting Standards

During the year ended September 30, 2020, GASB issued Statement No. 95, *Postponement of the Effective Dates of Certain Authoritative Guidance*, which postpones the effective dates of GASB Statement No.'s 84, 89, 90, 91, 92 and 93 by one year and GASB Statement No. 87 by 18 months; however, earlier application of the provisions addressed in GASB Statement No. 95 is encouraged and is permitted to the extent specified in each pronouncement as originally issued. In accordance with GASB Statement No. 95, management has elected to postpone implementation of these statements.

In January 2017, GASB issued Statement No. 84, *Fiduciary Activities*. This Statement is to improve guidance regarding the identification of fiduciary activities for accounting and financial reporting purposes and how those activities should be reported. The requirements of this Statement will enhance consistency and comparability by (1) establishing specific criteria for identifying activities that should be reported as fiduciary activities and (2) clarifying whether and how business-type activities should report their fiduciary activities. Management does not believe that this statement, upon implementation, will have a material effect on the financial statements. In accordance with GASB Statement No. 95, GASB Statement No. 84 will be effective for fiscal year ending September 30, 2022.

In June 2017, GASB issued Statement No. 87, *Leases*. The objective of this Statement is to better meet the information needs of financial statement users by improving accounting and financial reporting for leases by governments. This Statement increases the usefulness of governments' financial statements by requiring recognition of certain lease assets and liabilities for leases that previously were classified as operating leases and as inflows of resources or outflows of resources recognized based on the payment provisions of the contract. Management believes that this statement, upon implementation, will have a material effect on the financial statements. In accordance with GASB Statement No. 95, GASB Statement No. 87 will be effective for fiscal year ending September 30, 2022.

In June 2018, GASB issued Statement No. 89, *Accounting for Interest Cost Incurred Before the End of a Construction Period*. The objectives of this Statement are (1) to enhance the relevance and comparability of information about capital assets and the cost of borrowing for a reporting period and (2) to simplify accounting for interest cost incurred before the end of a construction period. Management does not believe that this statement, upon implementation, will have a material effect on the financial statements. In accordance with GASB Statement No. 95, GASB Statement No. 89 is effective for the fiscal year ending September 30, 2021. The implementation of this statement did not have a material impact on the financial statements.

(2) Summary of Significant Accounting Policies, continued

In March 2018, GASB issued Statement No. 90, *Majority Equity Interests - An Amendment of GASB Statements No. 14 and 61*. The primary objectives of this Statement are to improve the consistency and comparability of reporting a government's majority equity interest in a legally separate organization and to improve the relevance of financial statement information for certain component units. It defines a majority equity interest and specifies that a majority equity interest in a legally separate organization should be reported as an investment if a government's holding of the equity interest meets the definition of an investment. A majority equity interest that meets the definition of an investment should be measured using the equity method, unless it is held by a special-purpose government engaged only in fiduciary activities, a fiduciary fund, or an endowment (including permanent and term endowments) or permanent fund. Those governments and funds should measure the majority equity interest at fair value. Management does not believe that this statement, upon implementation, will have a material effect on the financial statements. In accordance with GASB Statement No. 95, GASB Statement No. 90 will be effective for the fiscal year ending September 30, 2022.

In May 2019, GASB issued Statement No. 91, *Conduit Debt Obligations*. The primary objectives of this Statement are to provide a single method of reporting conduit debt obligations by issuers and eliminate diversity in practice associated with (1) commitments extended by issuers, (2) arrangements associated with conduit debt obligations, and (3) related note disclosures. This Statement achieves those objectives by clarifying the existing definition of a conduit debt obligation; establishing that a conduit debt obligation is not a liability of the issuer; establishing standards for accounting and financial reporting of additional commitments and voluntary commitments extended by issuers and arrangements associated with conduit debt obligations; and improving required note disclosures. Management does not believe that this statement, upon implementation, will have a material effect on the financial statements. In accordance with GASB Statement No. 95, GASB Statement No. 91 will be effective for the fiscal year ending September 30, 2023.

In January 2020, GASB issued Statement No. 92, *Omnibus 2020*. The objectives of this Statement are to enhance comparability in accounting and financial reporting and to improve the consistency of authoritative literature by addressing practice issues that have been identified during implementation and application of certain GASB Statements. This Statement addresses a variety of topics and includes specific provisions about the effective date of Statement No. 87, *Leases*, and Implementation Guide No. 2019-3, *Leases*, for interim financial reports, the terminology used to refer to derivative instruments and the applicability of certain requirements of Statement No. 84, *Fiduciary Activities*, to postemployment benefits. The requirements related to the effective date of GASB Statement No. 87 and Implementation Guide 2019-3, reissuance recoveries and terminology used to refer to derivative instruments are effective upon issuance.

(2) Summary of Significant Accounting Policies, continued

New Accounting Standards, continued

The remaining requirements of GASB Statement No. 92 are effective for the fiscal year ending September 30, 2022.

In March 2020, GASB issued Statement No. 93, *Replacement of Interbank Offered Rates*. The primary objective of this Statement is to address those and other accounting and financial reporting implications of the replacement of an IBOR. Management does not believe that this statement, upon implementation, will have a material effect on the financial statements. In accordance with GASB Statement No. 95, GASB Statement No. 93 will be effective for the fiscal year ending September 30, 2022.

In March 2020, GASB issued Statement No. 94, *Public-Private and Public-Public Partnerships and Availability Payment Arrangements*. The primary objective of this Statement is to improve financial reporting by addressing issues related to public-private and public-public partnership arrangements. This Statement also provides guidance for accounting and financial reporting for availability payment arrangements. Management does not believe that this statement, upon implementation, will have a material effect on the financial statements. GASB Statement No. 94 will be effective for the fiscal year ending September 30, 2023.

In May 2020, GASB issued Statement No. 96, *Subscription-Based Information Technology Arrangements*. This Statement provides guidance on the accounting and financial reporting for subscription-based information technology arrangements (SBITAs) for government end users (governments). This Statement (1) defines a SBITA; (2) establishes that a SBITA results in a right-to-use subscription asset - an intangible asset - and a corresponding subscription liability; (3) provides the capitalization criteria for outlays other than subscription payments, including implementation costs of a SBITA; and (4) requires note disclosures regarding a SBITA. Management does not believe that this statement, upon implementation, will have a material effect on the financial statements. GASB Statement No. 96 will be effective for the fiscal year ending September 30, 2023.

In June 2020, GASB issued Statement No. 97, *Certain Component Unit Criteria, and Accounting and Financial Reporting for Internal Revenue Code Section 457 Deferred Compensation Plans - an amendment of GASB Statements No. 14 and No. 84, and a supersession of GASB Statement No. 32*. The primary objectives of this Statement are to (1) increase consistency and comparability related to the reporting of fiduciary component units in circumstances in which a potential component unit does not have a governing board and the primary government performs the duties that a governing board typically would perform; (2) mitigate costs associated with the reporting of certain defined contribution pension plans, defined contribution other postemployment benefit (OPEB) plans, and employee benefit plans other than pension plans or OPEB plans (other employee benefit plans) as fiduciary component units in fiduciary fund financial statements: and

(2) Summary of Significant Accounting Policies, continued

New Accounting Standards, continued

(3) enhance the relevance, consistency, and comparability of the accounting and financial reporting for Internal Revenue Code (IRC) Section 457 deferred compensation plans (Section 457 plans) that meet the definition of a pension plan and for benefits provided through those plans. Management does not believe that this statement, upon implementation, will have a material effect on the financial statements. GASB Statement No. 97 will be effective for the fiscal year ending September 30, 2022.

Off-Balance Sheet Financial Instruments

In the ordinary course of business, CEDA has entered into off-balance sheet financial instruments consisting of commitments to extend credit and loan guarantees. Such financial instruments are recorded in the financial statements when they become payable.

Estimates

The preparation of financial statements in conformity with accounting principles generally accepted in the United States of America requires management to make estimates and assumptions that affect the reported amounts of assets and liabilities and disclosure of contingent assets and liabilities at the date of the financial statements and the reported amounts of revenues and expenses during the reporting period. Actual results could differ from those estimates.

(3) Restricted Cash and Cash Equivalents and Time Certificates of Deposit

DBD

Restricted cash and cash equivalents and time certificates of deposit represent the proceeds of Covenant funding and liquidated revenue bonds derived from pledged Covenant funding, and are restricted for capital development purposes. Proceeds are deposited with commercial lending institutions and the securities are held in the name of CEDA.

At September 30, 2021 and 2020, restricted cash and cash equivalents and time certificates of deposit amounting to $8,819,500 and $7,714,267, respectively, consist of amounts held in demand deposit accounts. These amounts are presented at fair value in the accompanying financial statements, in accordance with GASB Statement No. 31.

(3) Restricted Cash and Cash Equivalents and Time Certificates of Deposit, continued

DCD

Restricted cash and cash equivalents represent funds for the SSBCI loan program maintained by CEDA as the disbursing agent deposited with commercial lending institutions held in the name of CEDA. At September 30, 2021 and 2020, restricted cash and cash equivalents for the SSBCI loan program were $5,312,409 and $4,825,320, respectively, maintained in financial institutions subject to FDIC.

(4) Loans Receivable

DCD

As described in note 1, DCD was established to serve as the economic development loan fund agency for qualified private sector enterprises pursuant to Public Law 4-49. In this capacity, all functions, powers, duties, funds, contracts, obligations and liabilities managed and administered by the Northern Mariana Islands Economic Development Loan Fund (EDLF) were transferred to DCD. EDLF was established pursuant to Article VII, Section 702(c) of the Covenant, dated February 15, 1975, to administer financial resources received under the Covenant, which were specifically set aside for a loan program to assist the general economic development of the Northern Mariana Islands.

Outstanding loans are due within various periods not to exceed thirty (30) years. The interest rates charged are based on the economic purpose of the loan. Production development loans bear interest at 7% to 9%, marine and agriculture loans bear interest at 4.5%, commercial development loans bear interest at 7% to 9%, and microloans bear interest at 7% to 12%. In October 2007, CEDA initiated a "Debt Relief Program" (the Program) to address increasing delinquent loans. The Program provides for reduction of interest to two percent and extension of term up to thirty years with a mandated three-year callable provision where warranted and justified.

(4) Loans Receivable,continued

Major classifications of economic development loans as of September 30, 2021 and 2020 (with combining information as of September 30, 2021), are as follows:

	DBD	DCD	2021	2020
General	$ -	$ 26,111,914	$ 26,111,914	$ 25,648,464
Marine		4,069,024	4,069,024	4,385,149
Agriculture	-	1,175,899	1,175,899	1,175,203
Banking Division	-	-	-	121,307
Loan principal receivable	-	31,356,837	31,356,837	31,330,123
Less allowance for loan losses	-	(23,579,376)	(23,579,376)	(24,109,558)
Net loans receivable	$ -	$ 7,777,461	$ 7,777,461	$ 7,220,565

Maturities of the above principal balances subsequent to September 30, 2021 will be as follows:

	DBD	DCD	Total
Fully matured and others	$ -	$ 21,228,330	$ 21,228,330
1 – 6 months	-	111,319	111,319
7 – 18 months	-	21,416	21,416
19 months – 3 years	-	782,604	782,604
After 3 years	-	9,213,168	9,213,168
	$ -	$ 31,356,837	$ 31,356,837

Allowance for Loan Losses

An analysis of the change in the allowance for loan losses is as follows:

	DBD	DCD	Total
Balance – beginning of year	$ -	$ 24,109,558	$ 24,109,558
Provision for (recovery from) loan losses	-	52,860	52,860
Write-off loans	-	(583,042)	(583,042)
Balance – end of year	$ -	$ 23,579,376	$ 23,579,376

(5) Finance Leases

DCD

CEDA leases certain foreclosed real estate properties for periods ranging from ten to twenty-five years under direct finance leases. The leases bear interest at fixed rates ranging from 4.5% to 5.0% and provide options to purchase at $1 and $100 plus the outstanding lease receivable and related accrued interest. Finance lease income for the years ended September 30, 2021 and 2020 amounted to $35,333 and $29,548, respectively and is included in other operating revenues. Future minimum lease rentals (payments) and future minimum lease income under these arrangements as of September 30, 2021, are as follows:

Year ending September 30	Minimum Lease Rentals	Minimum Lease Income	Net 2021	Net 2020
2022	$ 108,171	$ 48,885	$ 59,286	$ 72,160
2023	108,171	36,011	72,160	72,160
2024	111,723	35,783	75,940	75,940
2025	111,025	35,119	75,906	75,906
2026	111,025	35,119	75,906	75,906
Thereafter	549,114	191,027	358,087	449,019
	$ 1,099,229	$ 381,944	717,285	821,091
Less current portion			(59,286)	(104,111)
Noncurrent portion			$ 657,999	$ 716,980

(6) Investments

A Memorandum of Agreement (MOA) was established between CEDA and the Commonwealth Utilities Corporation (CUC) on November 21, 2002, as amended in January 2004, to waive a portion of the capital development loans receivable and to provide for the conversion into equity ownership of the balance. Public Laws 13-35, 13-36 and 16-17 were enacted to effectuate the settlement of disputes between CEDA and CUC as required by the MOA.

(6) Investments, continued

On May 7, 2009, CUC and CEDA entered into a Preferred Stock Agreement (the Agreement) to effectuate the terms and conditions of the MOA by requiring CUC to issue shares of cumulative, non-convertible and non-transferrable preferred stock of $45,000,000 to CEDA and yielding annual dividends of two percent. The Commonwealth Public Utilities Commission approved the Agreement on September 3, 2009. The Agreement provides CUC the right to purchase from CEDA up to $16,200,000 of the $45,000,000 preferred stock through offset against CUC's future, internally funded capital improvement projects. Subject to CUC purchase exception, CEDA shall not transfer any of its rights, title, or interest to such preferred stock. Further, the Agreement provides for deferral of the dividend payments for the first three years after issuance, with such deferred dividend payments being amortized, interest free, over a fifteen-year period. Dividends were to be paid to CEDA beginning October 1, 2012 but were not received. The Agreement cancels and discharges the indebtedness of CUC to CEDA of $61,568,750 in principal and $138,670,797 in accrued interest, including related late charges and any other charges owed by CUC on the capital development loans.

CUC issued to CEDA forty-five shares of preferred stock with a par value of $1,000,000 per share for a total aggregate value of $45,000,000 dated September 28, 2009. The preferred stock yields guaranteed dividends at two percent per annum payable quarterly in advance. The dividends of the preferred stock are cumulative from and after October 1, 2009 and bear no interest. CEDA has taken the position that the value of the preferred stock represents the net present value of the future stream of dividend payments required by CUC and not the face value of the stock itself. At September 30, 2021 and 2020, CEDA has recorded an investment of $11,309,651, with a corresponding 100% valuation allowance, based on the discounted cash flows of the future dividend payments at 6.27% per annum.

Minimum receipts (which do not factor in CUC's right to purchase up to $16,200,000 of preferred stock through offset against CUC's future, internally funded capital improvement projects) under the original agreement are as follows:

(6) Investments, continued

Year ending September 30		Principal Amount		Interest		Total
2013	$	875,589	$	204,411	$	1,080,000
2014		822,775		257,225		1,080,000
2015		773,147		306,853		1,080,000
2016		726,512		353,488		1,080,000
2017		682,691		397,309		1,080,000
2018 – 2022		2,843,258		2,556,742		5,400,000
2023 – 2027		2,083,152		3,316,848		5,400,000
2028 – 2032		1,271,875		3,228,125		4,500,000
2033 – 2037		931,857		3,568,143		4,500,000
2038 - 2039		298,795		1,501,205		1,800,000
	$	11,309,651	$	15,690,349	$	27,000,000

On August 17, 2016, CEDA entered into an agreement with CUC for the total amount of unpaid dividend payments owed by CUC to CEDA and agreed to a dividend of $4,320,000 for the year ended September 30, 2016. The agreement states that CUC will make quarterly dividend payments beginning October 1, 2016, as required by the preferred stock agreement, with a payment to CEDA of $270,000 which represents the full amount of the quarterly dividend due. In 2015, CEDA has determined that, prospectively, dividend income will be recognized upon collection; however, changes in circumstances in CUC's cash flows resulted in collections of dividends receivable as of September 30, 2021 and 2020. At September 30, 2021 and 2020, CEDA recorded dividends receivable of $1,080,000 and $1,800,000, respectively, for deferred dividends earned for the first three years after issuance of the preferred stock which is being amortized over a fifteen-year period.

(7) Capital Assets

Capital assets consist of the following at September 30, 2021 and 2020:

DCD

	Estimated useful lives	Balance at October 1, 2020	Additions	Deletions	Balance at September 30, 2021
Capital assets not being depreciated:					
Land, net		$ 184,348	$ -	$ -	$ 184,348
Capital assets being depreciated:					
Structure and improvements	7 years	761,934	-	-	761,934
Vehicles/office equipment	3–5 years	235,561	3,872	-	239,433
Computer equipment	3–5 years	69,404	1,296	-	70,700
Furniture and fixtures	7 years	106,112	3,880	-	109,992
Rent to Own Home (RTOH)	10 years	65,863	-	-	65,863
		1,238,874	9,048	-	1,247,922
Less: accumulated depreciation		(562,653)	(59,251)	-	(621,904)
Total capital assets being depreciated		676,221	(50,203)	-	626,018
Total capital assets, net		$ 860,569	$ (50,203)	$ -	$ 810,366

(7) Capital Assets, continued

	Estimated useful lives	Balance at October 1, 2019	Additions	Deletions	Balance at September 30, 2020
Capital assets not being depreciated:					
Land, net		$ 184,348	$ -	$ -	$ 184,348
Capital assets being depreciated:					
Structure and improvements	7 years	761,934	-	-	761,934
Vehicles/office equipment	3–5 years	211,667	23,894	-	235,561
Computer equipment	3–5 years	76,048	-	(6,644)	69,404
Furniture and fixtures	7 years	104,655	1,457	-	106,112
Rent to Own Home (RTOH)	10 years	-	65,863	-	65,863
		1,154,304	91,214	(6,644)	1,238,874
Less: accumulated depreciation		(511,510)	(57,777)	6,634	(562,653)
Total capital assets being depreciated		642,794	33,437	(10)	676,221
Total capital assets, net		$ 827,142	$ (33,437)	$ (10)	$ 860,569

(8) Foreclosed Real Estate

A summary of the changes in foreclosed real estate and the related valuation allowance as of September 30, 2021

	DCD For Sale	DCD For Lease	2021	2020
Foreclosed Real Estate:				
Balance at beginning of year	$ 1,004,460	$ 2,050,876	$ 3,055,336	3,055,336
Additions	-	-	-	12,000
Deletions	-	-	-	-
Reclassifications	-	-	-	(12,000)
	1,004,460	2,050,876	3,055,336	3,055,336
Valuation allowance	(485,230)	(1,063,663)	(1,548,893)	(1,548,893)
Balance at end of year	$ 519,230	$ 987,213	$ 1,506,443	1,506,443
Valuation allowance:				
Balance at beginning of year	(485,230)	1,063,663	1,548,893	1,548,893
Write-offs/transfers	-	-	-	-
Balance at end of year	$ 485,230	$ 1,063,663	$ 1,548,893	1,548,893

(9) Contributions for Capital Development Grants

As described in note 2, DBD receives and holds U.S. economic assistance provided in the Covenant. Terms and conditions of this assistance are contained in the *Agreement of the Special Representatives on Future United States Financial Assistance for the Northern Mariana Islands* (the Agreement). In accordance with the Agreement, DBD uses the proceeds, and accumulated earnings, by issuing either grants or loans to subrecipients, and acts in a pass-through capacity. Revenues and expenditures related to grant agreements are recognized by the subrecipient with DBD recording expense under the caption "contributions for capital development grants".

Contributions for capital development grants consist of (a) transfers to the CNMI for capital projects of the CNMI Third Senatorial Districts pursuant to Saipan Local Law No. 18-17 of $14,860 and $32,041 for the years ended September 30, 2021 and 2020, respectively, (b) transfers to the CNMI for road paving projects in Kagman III, Phase I, II and III pursuant to Saipan Local Law No. 19-15 of $-0- for the years ended September 30, 2021 and 2020, respectively, (c) transfers to the CNMI for capital projects pursuant to Saipan Local Law No. 20-01 of $104,268 and $26,245 for the years ended September 30, 2021 and 2020, respectively, (d) transfers to the CNMI for capital projects pursuant to Tinian Local Law No. 19-04 of $-0- and $16,169 for the years ended September 30, 2021 and 2020, respectively.

(10) Commitments and Contingencies

Commitments

CEDA leases certain foreclosed real estate properties for periods ranging from one to fifty-five years. CEDA also leases commercial space in its building for one-to-two-year periods with monthly leases of $100 to $600 per unit. Total lease income for the years ended September 30, 2021 and 2020 amounted to $211,288 and $183,476, respectively. Minimum future lease income for all leases is as follows:

Year ending September 30,	Minimum Lease Income Due
2022	$ 96,445
2023	92,545
2024	92,545
2025	92,545
2026	92,545
Thereafter	2,707,699
	$ 3,174,324

CEDA leases its office space and equipment in Rota for an annual rental of $6,000. Total minimum future rental is $3,500 under this operating lease for the year ending September 30, 2022.

(11) Risk Management

CEDA is exposed to various risks of loss related to torts; theft of, damage to, and destruction of assets; errors and omissions, injuries to employees; and natural disasters. CEDA has elected to purchase commercial insurance from independent third parties for the risks of loss to which it is exposed. Settled claims from these risks have not exceeded commercial insurance coverage in any of the past three fiscal years.

(12) COVID-19 Pandemic

Economic uncertainties have arisen as a result of the COVID-19 coronavirus pandemic, which continuously negatively affects CEDA financial results. Globally, the world economy pace of recovery remains slow and uneven which poses significant challenges for businesses and employees in the CNMI both in private and public sectors.

CEDA has implemented a payment deferral assistance program beginning March 2020 until October 31, 2020. No action is required by the borrowers and the deferred loan payments will be added to the end of the loan. Interest will accrue with rates ranging from 2% to 9% and averaging at 6%. CEDA expects this matter to negatively impact its future financial results; however, the related financial impact cannot be reasonably estimated at this time.

In April 2020, CEDA transferred DBD funds of $6,000,000 to the CNMI Government in connection with the Governor's Executive Order 2020-005 in response to mitigation of COVID-19. The funds are derived from DCD's CIP revolving loan fund and are intended and reserved for CIP future project expenditures. CEDA anticipates that these funds will be reimbursed as soon as conditions improve in the CNMI as it is important that CEDA continues its mandate to fund future capital improvement projects.

(13) Separation of NMHC

In fiscal year 2021, all positions of the NMHC Board of Directors have been appointed and confirmed and therefore, operations of NMHC are no longer under the direction and control of the CEDA Board of Directors. Future CEDA financial statements will no longer incorporate NMHC.

(14) Date of Management's Review

In preparing the accompanying financial statements and these footnotes, management has evaluated subsequent events through June 21, 2024, which is the date the financial statements were available to be issued. There were no such events requiring accrual or disclosure.

COMMONWEALTH ECONOMIC DEVELOPMENT AUTHORITY

(fka: Commonwealth Development Authority)

Combining Statement of Net Position

September 30, 2021

ASSETS	Development Banking Division	Development Corporation Division	Elimination Entries	Total
Current assets:				
Cash and cash equivalents	$ -	$ 4,699,450	$ -	$ 4,699,450
Time certificates of deposit	-	7,750,000	-	7,750,000
Receivables:				-
Current portion of loans receivable, net	-	132,735	-	132,735
Current portion of finance lease receivable, net	-	59,286	-	59,286
Rent, net	-	52,920	-	52,920
Accrued interest, net	-	65,156	-	65,156
Dividends	1,080,000	-	-	1,080,000
Other, net		55,694	-	55,694
Prepaid expenses	-	9,069	-	9,069
Total current assets	1,080,000	12,824,310	-	13,904,310
Other assets:				
Cash and cash equivalents, restricted	6,319,500	5,312,409	-	11,631,909
Time certificates of deposit, restricted	2,500,000	-	-	2,500,000
Total other assets	8,819,500	5,312,409	-	14,131,909
Noncurrent assets:				
Loans receivable, net of current portion	-	7,644,726	-	7,644,726
Finance lease receivable, net of current portion	-	657,999	-	657,999
Due from CNMI government	6,000,000	-	-	6,000,000
Due from other funds	-	31	(31)	-
Depreciable capital assets, net of accumulated depreciation	-	626,018	-	626,018
Nondepreciable capital assets	-	184,348	-	184,348
Foreclosed real estate, net	-	1,506,443	-	1,506,443
Total noncurrent assets	6,000,000	10,619,565	(31)	16,619,534
	$ 15,899,500	$ 28,756,284	-$ 31	$ 44,655,753
LIABILITIES, DEFERRED INFLOWS OF RESOURCES AND NET POSITION				
Current liabilities:				
Accounts payable and accrued expenses	$ -	$ 1,235,674	$ -	$ 1,235,674
Unearned revenues, current portion	-	15,094	-	15,094
Loan commitment	-	5,432,851	-	5,432,851
Total current liabilities	-	6,683,619	-	6,683,619
Due to other funds	31	-	(31)	-
Unearned revenues, net of current portion	-	575,557	-	575,557
Total liabilities	31	7,259,176	(31)	7,259,176
Deferred inflows of resources:				
Unearned revenues	-	-	-	-
Total deferred inflows of resources	-	-	-	-
Net position:				
Net investment in capital assets	-	810,366	-	810,366
Restricted	15,899,469	20,686,742	-	36,586,211
Total net position	15,899,469	21,497,108	-	37,396,577
	$ 15,899,500	$ 28,756,284	$ (31)	$ 44,655,753

See Independent Auditor's Report.

COMMONWEALTH ECONOMIC DEVELOPMENT AUTHORITY
(fka: Commonwealth Development Authority)
Combining Statement of Revenues, Expenses, and Changes in Net Position
Year Ended September 30, 2021

	Development Banking Division	Development Corporation Division	Elimination Entries	Total
Operating revenues:				
Interest and fees on loans	$ -	$ 271,572	$ -	$ 271,572
Interest and dividends on investments	10,984	12,863	-	23,847
Other	-	594,944	-	594,944
	10,984	879,379	-	890,363
Recovery of loan impairment	-	52,860	-	52,860
Provision for interest impairment	-	(8,357)	-	(8,357)
Net operating revenues	10,984	923,882	-	934,866
Operating expenses:				
Salaries and wages	-	611,214	-	611,214
Employee benefits	-	315,055	-	315,055
Repairs and maintenance	-	22,788	-	22,788
Utilities	-	40,236	-	40,236
Depreciation	-	59,251	-	59,251
Professional fees	-	76,496	-	76,496
Travel	-	9,014	-	9,014
Rent	-	17,342	-	17,342
Other	326,289	96,149	-	422,438
Total operating expenses	326,289	1,247,545	-	1,573,834
Operating loss	(315,305)	(323,663)	-	(638,968)
Nonoperating revenues (expenses):				
Dividend income	900,000	-	-	900,000
Other income	-	550	-	550
Other expense	-	(24,384)	-	(24,384)
Total nonoperating revenues, net	900,000	(23,834)	-	876,166
Income (loss) before transfers and capital contributions	584,695	(347,497)	-	237,198
Contributions for capital development grants	(119,128)	-	-	(119,128)
Change in net position	465,567	(347,497)	-	118,070
Net position - beginning	15,433,902	21,844,605	-	37,278,507
Net position - ending	$ 15,899,469	$ 21,497,108	$ -	$ 37,396,577

See Independent Auditor's Report.

COMMONWEALTH ECONOMIC DEVELOPMENT AUTHORITY
(fka: Commonwealth Development Authority)
Combining Statement of Cash Flows
Year Ended September 30, 2021

	Development Banking Division	Development Corporation Division	Elimination Entries	Total
Cash flows from operating activities:				
Cash received from interest and fees on loans receivable	$ -	$ 264,163	$ -	$ 264,163
Interest and dividends on investments	11,104	12,863	-	23,967
Cash payments to suppliers for goods and services	(120)	(69,639)	-	(69,759)
Cash received from customers	-	2,304	-	2,304
Cash payments to employees for services	-	(753,777)	-	(753,777)
Cash received for loan commitment	-	490,051	-	490,051
Net cash provided by (used for) operating activities	10,984	(54,035)	-	(43,051)
Cash flows from capital and related financing activities:				
Net interdivisional transactions	(406,503)	406,503	-	-
Acquisition of capital assets	-	(9,048)	-	(9,048)
Net disbursements of loans receivable	-	(512,393)	-	(512,393)
Net receipts of finance lease receivable	-	139,139	-	139,139
Transfers for capital development grants	(119,128)	-	-	(119,128)
Transfers for loan commitment	-	(486,969)	-	(486,969)
Net cash used for capital and related financing activities	(525,631)	(462,768)	-	(988,399)
Cash flows from investing activities:				
Proceeds from (purchase of) restricted cash and cash equivalents and time certificates of deposit	(1,105,353)	(5,000,000)	-	(6,105,353)
Dividend received	1,620,000	-	-	1,620,000
Interest received	-	-	-	-
Net cash provided by (used for) investing activities	514,647	(5,000,000)	-	(4,485,353)
Net increase (decrease) in cash and cash equivalents	-	(5,516,803)	-	(5,516,803)
Cash and cash equivalents at beginning of year	-	10,216,253	-	10,216,253
Cash and cash equivalents at end of year	$ -	$ 4,699,450	$ -	$ 4,699,450
		-		
Reconciliation of operating loss to net cash used for operating activities:				
Operating loss	$ (315,305)	$ (323,663)	$ -	$ (638,968)
Adjustments to reconcile operating loss to net cash provided by (used for) operating activities:				
Recovery for loan impairment	-	(52,860)	-	(52,860)
Provision for interest impairment	-	8,357	-	8,357
Expenses allocated from DCD to DBD	326,289	(326,289)	-	-
Depreciation	-	59,251	-	59,251
Finance lease revenue	-	(35,333)	-	(35,333)
Other	-	(23,834)	-	(23,834)
(Increase) decrease in assets:				
Receivables:				
Rent	-	(2,063)	-	(2,063)
Accrued interest	-	(7,409)	-	(7,409)
Other	-	411	-	411
Prepaid expenses	-	368	-	368
Increase (decrease) in liabilities:				
Accounts payable and accrued expenses	-	87,289	-	87,289
Unearned revenues	-	71,689	-	71,689
Loan commitment	-	490,051	-	490,051
Net cash provided by (used for) operating activities	$ 10,984	$ (54,035)	$ -	$ (43,051)

See Independent Auditor's Report.

INDEPENDENT AUDITORS' 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 Board of Directors of
Commonwealth Economic Development Authority

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 Commonwealth Economic Development Authority (CEDA), a component unit of the Commonwealth of the Northern Mariana Islands Government, which comprise the statement of net position as of September 30, 2021 and the related statements of revenues, expenses and changes in net position, and of cash flows for the year then ended, and the related notes to the financial statements, which collectively comprise Commonwealth Economic Development Authority's basic financial statements, and have issued our report thereon dated June 21, 2024.

Report on Internal Control over Financial Reporting

In planning and performing our audit of the financial statements, we considered CEDA's internal control over financial reporting (internal control) as a basis for designing 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 CEDA's internal control. Accordingly, we do not express an opinion on the effectiveness of CEDA'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 or significant deficiencies may exist that were not identified.

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Report on Compliance and Other Matters

As part of obtaining reasonable assurance about whether CEDA'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 financial statements. 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.

Burger Comer & Associates

Saipan, MP 96950
June 21, 2024

Unresolved Prior Year Findings
Year Ended September 30, 2021

There are no unresolved findings from prior year audits of CEDA.