

STATE OF INDIANA  
COUNTY OF MARION

)  
) SS:  
)

BEFORE THE INDIANA  
COMMISSIONER OF INSURANCE

IN THE MATTER OF:

Southeastern Indiana Health Organization, Inc.  
417 Washington Street  
Columbus, IN 47201

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Examination of Southeastern Indiana Health Organization, Inc.

**NOTICE OF ENTRY OF ORDER**

Enclosed is the Final Order entered by Stephen W. Robertson, Commissioner of the Indiana Department of Insurance, after fully considering and reviewing the Verified Report of Examination of Southeastern Indiana Health Organization, Inc., any relevant examination work papers, and any written submissions or rebuttals. The Verified Report of Examination, as sent to you on May 26, 2015, has been adopted by the Commissioner.

Pursuant to Ind. Code § 27-1-3.1-12(b), within thirty (30) days of receipt of the Final Order, each director of Southeastern Indiana Health Organization, Inc. shall file an affidavit with the Indiana Department of Insurance stating that he/she has received a copy of the Verified Report of Examination and the Final Order.

The Final Order is a final administrative decision that may be appealed pursuant to Ind. Code § 4-21.5-5.

7/2/2015  
Date

  
Cynthia D. Donovan  
Chief Financial Examiner

**CERTIFIED MAIL NUMBER: 91 7190 0005 2720 0045 3126**

STATE OF INDIANA ) BEFORE THE INDIANA  
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COUNTY OF MARION ) COMMISSIONER OF INSURANCE

IN THE MATTER OF: )  
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Southeastern Indiana Health Organization, Inc. )  
417 Washington Street )  
Columbus, IN 47201 )

Examination of Southeastern Indiana Health Organization, Inc.

### FINDINGS AND FINAL ORDER

The Indiana Department of Insurance conducted an examination into the affairs of the Southeastern Indiana Health Organization, Inc. (hereinafter "Company") for the time period January 1, 2011 through December 31, 2013.

The Verified Report of Examination was filed with the Commissioner of the Department of Insurance (hereinafter "Commissioner") by the Examiner on March 23, 2015.

A copy of the Verified Report of Examination, along with a Notice of Opportunity to Make Written Submission or Rebuttal, was mailed to the Company via Certified Mail on May 26, 2015 and was received by the Company on May 29, 2015.

The Company did not file any objections.

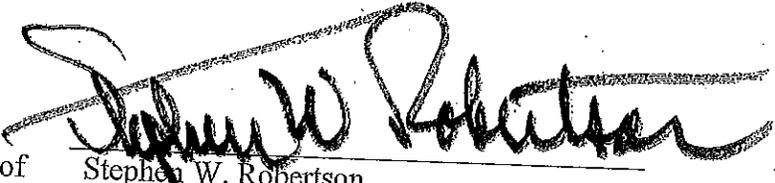
NOW THEREFORE, based on the Verified Report of Examination, I hereby make the following **FINDINGS**:

1. That the Verified Report of Examination is a true and accurate report of the financial condition and affairs of the Southeastern Indiana Health Organization, Inc. as of December 31, 2013.
2. That the Examiner's Recommendations are reasonable and necessary in order for the Southeastern Indiana Health Organization, Inc. to comply with the laws of the State of Indiana.

Based on the FINDINGS, the Commissioner does hereby ORDER:

1. Pursuant to Ind. Code § 27-1-3.1-11(a)(1), the Verified Report of Examination is adopted and shall be filed. Hereafter the Verified Report of Examination, may constitute prima facie evidence of the facts contained therein in any action or proceeding taken by the Indiana Department of Insurance against the Company, its officers, directors, or agents.
2. The Company shall comply with the Examiner's Recommendations enumerated in summary form and throughout the text of the Verified Report of Examination. A written response to these recommendations should be provided to the Department within 30 days of receipt of this order.
3. Compliance with the Examiner's recommendations shall be completed on or before the filing of the subsequent annual statement. In the event it is not feasible to comply with a recommendation before the filing of the subsequent annual statement, the Company shall submit a written explanation as to why it was not feasible with the filing of the annual statement.

Signed and Sealed this 2nd day of July, 2015:

  
Stephen W. Robertson  
Insurance Commissioner  
Indiana Department of Insurance

## ABOUT AFFIRMATIONS

The following pages for affirmations need to be signed by each Board Member and returned to the Indiana Department of Insurance within thirty (30) days in accordance with I.C. §27-1-3.1-12(b).

If your affirmations list individuals that are no longer on your Board of Directors, you may simply retype the form on plain white paper with the correct names and a line to the right for signature. If the names are misspelled, you may do the same, simply re-type the corrected form with a line to the right for signature.

Should you have any questions or difficulties with these forms or you require additional time past the thirty (30) day requirement, please do not hesitate to contact this department at (317) 232-2390.

*Handwritten signature*

**STATE OF INDIANA**  
**Department of Insurance**  
**REPORT OF EXAMINATION**

**OF**

**SOUTHEASTERN INDIANA HEALTH ORGANIZATION, INC.**  
NAIC Co. CODE 95812

As of

December 31, 2013

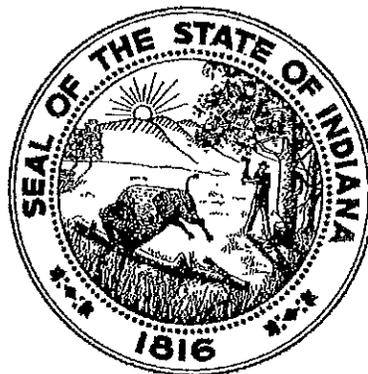


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# STATE OF INDIANA

# IDOI

MICHAEL R. PENCE, Governor

**Indiana Department of Insurance**  
311 W. Washington Street, Suite 300  
Indianapolis, Indiana 46204-2787  
Telephone: (317) 232-2385  
Fax: (317) 232-5251  
Stephen W. Robertson, Commissioner

March 23, 2015

Honorable Stephen W. Robertson, Commissioner  
Indiana Department of Insurance  
311 West Washington Street, Suite 300  
Indianapolis, Indiana 46204-2787

Dear Commissioner:

Pursuant to the authority vested in Appointment Number 3824, an examination has been made of the affairs and financial condition of:

**Southeastern Indiana Health Organization, Inc.**  
417 Washington Street  
Columbus, Indiana 47201

hereinafter referred to as the "Company", or "SIHO", an Indiana domestic health maintenance organization. The examination was conducted at the corporate offices of the Company in Columbus, Indiana.

The Report of Examination, reflecting the status of the Company as of December 31, 2013, is hereby respectfully submitted.

ACCREDITED BY THE  
NATIONAL ASSOCIATION OF INSURANCE COMMISSIONERS

AGENCY SERVICES (317) 232-2413    COMPANY COMPLIANCE (317) 233-0697    CONSUMER SERVICES (317) 232-2395    EXAMINATIONS/FINANCIAL SERVICES (317) 232-2390    MEDICAL MALPRACTICE (317) 232-2402    SECURITIES/COMPANY RECORDS (317) 232-1991    STATE HEALTH INSURANCE PROGRA 1-800-332-4674

## SCOPE OF EXAMINATION

The Company was last examined by representatives of the Indiana Department of Insurance (INDOI) as of the period ending December 31, 2010. The present risk-focused examination was conducted by Noble Consulting Services, Inc., and covered the period from January 1, 2011 through December 31, 2013, and included any material transactions and/or events occurring subsequent to the examination date and noted during the course of this examination.

The examination was conducted in accordance with the NAIC *Financial Condition Examiners Handbook* (Handbook). The Handbook requires that we plan and perform the examination to evaluate the financial condition and identify prospective risks of the Company by obtaining information about the Company, including corporate governance, identifying and assessing inherent risks within the Company, and evaluating system controls and procedures used to mitigate those risks. An examination also includes assessing the principles used and significant estimates made by management, as well as evaluating the overall financial statement presentation, management's compliance with Statutory Accounting Principles, and Annual Statement instructions, when applicable to domestic state regulations.

Merlinos & Associates, Inc., provided all actuarial services throughout the examination and conducted a review of the actuarially determined balances as of December 31, 2013.

All accounts and activities of the Company were considered in accordance with the risk-focused examination process.

## HISTORY

The Company is a not-for-profit tax paying health maintenance organization (HMO) incorporated in 1986. The Company has no owners or shareholders; however, it shares a common Board of Directors (Board) with an affiliate, Southeastern Indiana Health Operations, Inc. (SIHOPS). SIHOPS is also an Indiana not-for-profit organization, and manages the day-to-day operations of the Company as authorized by a joint Administrative Services Agreement in exchange for payment of a management fee.

Both SIHO and SIHOPS are affiliated with Columbus Regional Hospital, Schneck Medical Center, Bloomington Hospital and Health Systems, and Multi-County Physicians (MCP), who are all equal "Members" of both companies.

## CAPITAL AND SURPLUS

As of December 31, 2013, the Company had no common or preferred stock outstanding. The Company reported no capital stock and gross paid-in and contributed surplus totaling \$5,330,071 as of December 31, 2013.

On February 7, 2011, the Company and SIHOPS executed a promissory note and a corresponding subordination agreement. The note was funded by SIHOPS on February 7, 2011, for \$300,000 with an interest rate of 1.6%. Both the note and subordination agreement were approved by the INDOI. The result of this note and approval was to increase the capital and surplus of the Company by the amount of the note.

Effective January 1, 2013 the two (2) notes from MCP were consolidated and replaced by a single note with a face amount equal to the combined principal of the two (2) notes as of December 31, 2012, for \$259,292, bearing interest at 2% per year and with a maturity date of 76 months. The term of the new note is equal to the remaining months on the original note.

## TERRITORY AND PLAN OF OPERATION

SIHO is only licensed in the state of Indiana and provides group health coverage primarily in the southern region of Indiana. The Company, along with the business of third party administrator operations, provides fully insured and self-funded health plans. The Company's primary product is point of service comprehensive medical small group insurance with a focus on local employers with two (2) to fifty (50) members. The Company's products offer numerous features and services. The Company utilizes local agents and brokers to market its business. The Company does all of its own underwriting, the brokers do not accept risk or issue proposals/policies directly to the customers.

## GROWTH OF THE COMPANY

The following exhibit summarizes the financial results of the Company during the examination period:

Year	Admitted Assets	Liabilities	Capital and Surplus	Total Revenues	Net Income
2013	\$ 16,490,131	\$ 7,137,244	\$ 9,352,887	\$ 50,352,125	\$ 1,910,158
2012	15,311,183	7,407,948	7,903,235	47,421,331	2,156,540
2011	11,832,612	6,124,392	5,708,220	45,586,422	1,126,869

Admitted assets increased in 2013, primarily due to an increase in the federal tax recoverable and receivables from parent, affiliates, and subsidiaries. Capital and surplus increased in 2013, due to positive net income. Net income decreased in 2013, primarily due to the increase in total medical and hospital expenses.

## MANAGEMENT AND CONTROL

### Directors

The Bylaws provide that the business affairs of the Company are to be managed by a Board consisting of ten (10) members, each of whom, other than the President of the Company, shall be elected by the Physician and Hospital members. The Company and SIHOPS share the same Board. The following is a listing of persons serving as directors at December 31, 2013 and their principal occupations as of that date:

Name and Address	Principal Occupation
David Barker Columbus, Indiana	President and Chief Executive Officer Southeastern Indiana Health Organization, Inc.
James Bickel Columbus, Indiana	President and Chief Executive Officer Columbus Regional Hospital
Bradford Bomba, Jr., M.D. Bloomington, Indiana	Internist Internal Medicine Associates
Michael Dorenbusch, M.D. Columbus, Indiana	Surgeon Southern Indiana Surgery
John Fye, M.D. Seymour, Indiana	Family Practice Physician Family Medical Center

Terrance Greene, M.D.  
Bloomington, Indiana

Surgeon  
Self-Employed

Gary Meyer  
Seymour, Indiana

President and Chief Executive Officer  
Schneck Medical Center

Mark Moore  
Bloomington, Indiana

President and Chief Executive Officer  
Bloomington Hospital & Health Systems

Daniel Walters, M.D.  
Seymour, Indiana

Family Practitioner  
Caring Family Physicians

David Wilson, M.D.  
Columbus, Indiana

Pulmonologist  
The Lung Center

### Officers

The Bylaws state the principal officers of the Company shall be elected by the Board at the second regular meeting and consist of a President, a Secretary, and such other officers as the Board may from time to time elect. Each officer shall serve for one (1) year and until the officer's successor is elected and qualified. Any two (2) or more offices may be held by the same person, except the offices of the President and Secretary. Any officer other than the President may, but need not, be a member of the Board. Any officer may be removed by the Board at any time, with or without cause.

The following is a list of key officers and their respective titles as of December 31, 2013:

<u>Name</u>	<u>Office</u>
David Barker	President and Chief Executive Officer
Marc Rothbart	Senior Vice President
Mike Clancy	Vice President Information Technology
Richard Kramer	Interim Chief Financial Officer
Gary Meyer	Secretary

### CONFLICT OF INTEREST

Directors are required to review and sign Conflict of Interest statements annually. It was determined that all directors listed in the Management and Control section of this Report of Examination have reviewed and signed their statements as of December 31, 2013.

### CORPORATE RECORDS

#### Articles of Incorporation

There were no amendments made to the Articles of Incorporation during the examination period.

## Bylaws

There were no amendments made to the Bylaws during the examination period.

## Minutes

The Board and members meeting minutes were reviewed for the period under examination through the fieldwork date. Significant actions taken during each meeting were noted. During review of the Board meeting minutes, it was determined the officers of the Company were not elected by the Board in accordance with the Bylaws. See the Other Significant Issues section of this Report of Examination.

Indiana Code (IC) 27-1-7-7(b) states an annual meeting of shareholders, members, or policyholders shall be held within five (5) months after the close of each fiscal year of the Company and at such time within that period as the Bylaws may provide. The Company's Bylaws state the annual meeting of the members shall be held each year on the third Wednesday in April, or at such other date and time as may be specified by the Board. The annual meeting of members was held within five (5) months following the close of each fiscal year.

The Company committee meeting minutes for the examination period, and through the fieldwork date, were reviewed for the following committee: Quality Management Committee.

## AFFILIATED COMPANIES

### Organizational Structure

The following organizational chart shows the Company's parent and subsidiaries as of December 31, 2013:

	<u>NAIC Co. Code</u>	<u>Domiciliary State/Country</u>
IU Health (Bloomington Hospital)		IN
Columbus Regional Hospital		IN
Schneck Medical Center		IN
Multi-county Physicians		IN
<b>Southeastern Indiana Health Organization, Inc.</b>		IN
SIHO, LLC	95812	IN
Southeastern Indiana Health Operations, Inc.		IN
Corporate Administrative Services, LLC		IN
Corporate Consulting Services, LLC		IN
SIG Insurance Services, Inc.		IN
SIHO Network, LLC <sup>A</sup>		IN
SIHOPS Medical Care, LLC		IN
SIHOPS, LLC		IN
Southern Indiana Primary Care, LLC		IN

<sup>A</sup> SIHO Network, LLC is owned by SIHOPS (40%), IU Health Bloomington Hospital (20%), Columbus Regional Hospital (20%), and Schneck Medical Center (20%)

### Affiliated Agreements

The following affiliated agreement was disclosed as part of the Form B – Holding Company Registration Statement and were filed with the INDOI, as required, in accordance with IC 27-1-23-4.

#### *Administrative Services Agreement*

Effective July 1, 2003, the Company entered into the Administrative Services Agreement, as amended, with SIHOPS. Under this agreement, SIHOPS shall supply all administrative functions and operating processes to the Company. The services to be performed include communications, corporate finance, executive strategic and operations management, facilities management, human resources, information technology, mail, printing supplies, product management, records, sales and marketing, tax, telecommunications, and third party administration. The base compensation for services provided under the agreement is determined on the basis of the recovery of costs for such services plus 10%. During 2013, the Company paid \$5,180,000 for services provided under this agreement.

### FIDELITY BOND AND OTHER INSURANCE

The Company protects itself against loss from any fraudulent or dishonest acts by any employees through a fidelity bond issued by Travelers Casualty and Surety Company of America. The bond has a single loss coverage limit of \$10,000,000, with a \$100,000 deductible. The fidelity bond is adequate to meet the prescribed minimum coverage specified by the NAIC.

The Company had additional types of coverage in-force at December 31, 2013, including, but not limited to, automobile liability, employers liability, fiduciary liability, general liability, and general property.

### PENSION, STOCK OWNERSHIP, AND INSURANCE PLANS

SIHO has no outstanding agreements of this nature. SIHOPS offers basic retirement benefits through company paid contributions to 401K Plans and a deferred compensation and pension program for key executives. These plans do not have material impact on the financial results of either affiliated organization.

### STATUTORY DEPOSITS

The Company reported the following statutory deposits at December 31, 2013:

<u>State</u>	<u>Book Value</u>	<u>Fair Value</u>
For All Policyholders:		
Indiana	\$ 600,000	\$ 600,000
Total Deposits	<u>\$ 600,000</u>	<u>\$ 600,000</u>

### REINSURANCE

The Company has an HMO Excess Risk Reinsurance Agreement with RGA Reinsurance Company. The deductible amount for such reinsurance coverage is \$300,000 per member per agreement period. The reinsurer is liable for 80% excess of retention for eligible services, with the maximum reinsurance coverage payable for eligible charges as to any one (1) member of \$2,000,000 per member per agreement period.

## ACCOUNTS AND RECORDS

The Company's accounting procedures, practices, account records, and supporting data were reviewed and tested to the extent deemed necessary. The trial balances prepared from the Company's general ledger for the years ended December 31, 2012 and December 31, 2013, were agreed to the respective Annual Statements. The Annual Statements for the years ended December 31, 2011 through December 31, 2013, were agreed to each year's independent audit report without material exception. The Company's accounting procedures, practices, and account records were deemed satisfactory.

SOUTHEASTERN INDIANA HEALTH ORGANIZATION, INC.

Assets

As of December 31, 2013

	<u>Per Examination*</u>
Bonds	\$ 600,904
Real Estate:	
Properties occupied by the company	2,378,440
Cash, cash equivalents and short-term investments	<u>11,740,641</u>
Subtotals, cash and invested assets	14,719,985
Investment income due and accrued	7,389
Premiums and considerations:	
Uncollected premiums and agents' balances in course of collection	17,805
Reinsurance:	
Amounts recoverable from reinsurers	223,000
Current federal and foreign income tax recoverable and interest thereon	703,351
Net deferred tax asset	143,125
Receivables from parent, subsidiaries and affiliates	505,650
Health care and other amounts receivable	162,800
Aggregate write-ins for other than invested assets	<u>7,026</u>
Total assets excluding Separate Accounts, Segregated Accounts and Protected Cell Accounts	16,490,131
Total	<u>\$ 16,490,131</u>

\* There were no adjustments to the as-filed financial statements, therefore the Annual Statement amounts agree to the examination amounts.

SOUTHEASTERN INDIANA HEALTH ORGANIZATION, INC.  
 Liabilities, Surplus and Other Funds  
 As of December 31, 2013

	Per Examination*
Claims unpaid	\$ 5,264,070
Accrued medical incentive pool and bonus amounts	908,664
Unpaid claims adjustment expenses	279,400
Premiums received in advance	174,213
General expenses due or accrued	15,707
Ceded reinsurance premiums payable	164,673
Amounts due to parent, subsidiaries and affiliates	85,665
Aggregate write-ins for other liabilities	244,852
Total liabilities	7,137,244
Gross paid in and contributed surplus	5,330,071
Aggregate write-ins for other than special surplus funds	190,000
Unassigned funds (surplus)	3,832,816
Total capital and surplus	9,352,887
Total liabilities, capital and surplus	\$ 16,490,131

\* There were no adjustments to the as-filed financial statements, therefore the Annual Statement amounts agree to the examination amounts.

SOUTHEASTERN INDIANA HEALTH ORGANIZATION, INC.  
Statement of Revenue and Expenses  
For the Year Ended December 31, 2013

	<u>Per Examination*</u>
Member Months	125,615
Net premium income	\$ 49,629,978
Aggregate write-ins for other health care related revenues	457,967
Aggregate write-ins for other non-health revenues	264,180
Total revenues	<u>50,352,125</u>
Hospital/medical benefits	27,853,677
Other professional services	1,286,458
Outside referrals	1,380,480
Emergency room and out-of-area	1,865,330
Prescription drugs	6,679,806
Aggregate write-ins for other hospital and medical	406,217
Incentive pool, withhold adjustments, and bonus amounts	908,664
Subtotal	<u>40,380,632</u>
Net reinsurance recoveries	1,605,027
Total hospital and medical	38,775,605
Claims adjustment expenses	2,013,721
General administrative expenses	6,343,602
Increase in-reserves for life and accident and health contracts	71,600
Total underwriting deductions	47,204,528
Net underwriting gain or (loss)	3,147,597
Net investment income earned	6,131
Net investment gains (losses)	6,131
Net income or (loss) after capital gains tax and before all other federal income taxes	3,153,728
Federal and foreign income taxes incurred	1,243,570
Net income (loss)	<u>\$ 1,910,158</u>

\* There were no adjustments to the as-filed financial statements, therefore the Annual Statement amounts agree to the examination amounts.

SOUTHEASTERN INDIANA HEALTH ORGANIZATION, INC.  
Capital and Surplus Account Reconciliation

	2013	2012	2011
Capital and surplus prior reporting year	\$ 7,903,235	\$ 5,708,220	\$ 4,545,194
Net income	1,910,158	2,156,540	1,126,869
Change in net unrealized capital gains or (losses) less capital gains tax	-	-	(1,079)
Change in net deferred income tax	16,635	1,239	-
Change in nonadmitted assets	(177,141)	37,236	37,236
Change in surplus notes	(300,000)	-	-
Capital changes:			
Transferred to surplus	(39,082)	(37,236)	(37,236)
Surplus adjustments:			
Paid in	39,082	37,236	37,236
Net change in capital and surplus	<u>1,449,652</u>	<u>2,195,015</u>	<u>1,163,026</u>
Capital and surplus end of reporting period	<u>\$ 9,352,887</u>	<u>\$ 7,903,235</u>	<u>\$ 5,708,220</u>

### COMMENTS ON THE FINANCIAL STATEMENTS

There were no recommended adjustments to the financial statements as of December 31, 2013, based on the results of this examination.

### OTHER SIGNIFICANT ISSUES

The officers listed in the Management and Control section of this Report of Examination were not elected at the second regular Board meeting as stipulated in Article IV, Section 1 of the Company's Bylaws. It is recommended that the Board should elect the officers of the Company at the second regular Board meeting to be in compliance with the Company Bylaws.

IC 27-1-23-3(b) requires transactions between entities within a holding company system that are not in the ordinary course of business to be disclosed in the annual holding company registration statement. It is recommended that the Company file its intercompany agreements with SIG Insurance Services, Inc. and Southern Indiana Primary Care, LLC with the INDOI to come into compliance with IC 27-1-23-4(b).

### SUBSEQUENT EVENTS

Effective December 2014, the Company reorganized from a not-for-profit organization structure to a for-profit entity. There were no changes to the ownership, Board of Directors, or Officers of the Company as a result of this reorganization.

There were no further events subsequent to the examination date and prior to the completion of fieldwork which were considered material events requiring disclosure in this Report of Examination.

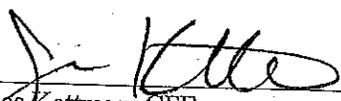
AFFIDAVIT

This is to certify that the undersigned is a duly qualified Examiner-in-Charge appointed by the Indiana Department of Insurance and that he, in coordination with staff assistance from Noble Consulting Services, Inc., and actuarial assistance from Merlinos & Associates, Inc., hereinafter collectively referred to as the "Examiners", performed an examination of Southeastern Indiana Health Organization, Inc., as of December 31, 2013.

The Indiana Department of Insurance is accredited under the National Association of Insurance Commissioners Financial Regulation Accreditation Standards.

This examination was performed in accordance with those procedures required by the NAIC Financial Condition Examiners Handbook and other procedures tailored for this examination. Such procedures performed on this examination do not constitute an audit made in accordance with generally accepted auditing standards and no audit opinion is expressed on the financial statements contained in this report.

The attached Report of Examination is a true and complete report of condition of Southeastern Indiana Health Organization, Inc., as of December 31, 2013, as determined by the undersigned.

  
\_\_\_\_\_  
James Kattman, CFE  
Noble Consulting Services, Inc.

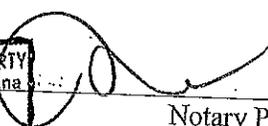
State of: Indiana  
County of: Marion

On this 13 day of March, 2015, before me personally appeared, James Kattman, to sign this document.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my notarial seal in said County and State, the day and year last above written.

My commission expires



  
\_\_\_\_\_  
Notary Public

MEMORANDUM

This is to certify that the enclosed is a copy of the report of the Commission on the Administration of the Government of the District of Columbia, as prepared by the Commission on the Administration of the Government of the District of Columbia, and is being furnished to you for your information.

The report is being furnished to you for your information and is not to be distributed outside your office without the approval of the Commission on the Administration of the Government of the District of Columbia.

Very truly yours,  
Commission on the Administration of the Government of the District of Columbia

cc: Mr. Tolson  
cc: Mr. Boardman

