In response to your audit presented in draft form, to the Board of Directors of the Greater Mohawk Valley Land Bank Corporation, we, the Board, find the results and findings to be fair but overly stringent and concentrated.

While the board acknowledges the insufficiency in staffing experienced practitioners of generally accepted accounting principles (GAAP) and government accounting standards board (GASB), as well as the proper linking and accounting for grant funding, we find that, of the 4 deficiencies and 1 significant deficiency noted, the board finds them to be generally linked to two areas of needed improvement.

Grant accounting and general knowledge of appropriate bookkeeping for a governmental agency such as ours encapsulate the recommendations set by this audit in 2017-001 - 2017-005 in our interpretation (which you will see in repeated or closely related responses to several referenced findings).

As such, and in direct response to the recommendation, the board will, in the next 90-120 days, establish an update to our 2018 board adopted written document of policies and procedures for proper accounting protocol in more specific relation to grant reporting.

Further, in order to pursue the best practices kept in our internal controls for all accounting standards, the board will authorize the retention of professional services of a certified public accounting firm with the express experience in government and not-for-profit accounting to assist our minimal staff.

Lastly, the board recently hired a full-time Administrative Assistant who has an Associate's degree in Business Administration with a concentration in Accounting and expects to have a Master in Accounting by the end of the year. And the board is looking to institute project management software (eProperties Plus) that will closely track and tie expenditures to specific properties and be able to provide detailed reports to staff, the Board and the general public

In summary, we, the Board of Directors of the Greater Mohawk Valley Land Bank, accept the fact that we have a need for internal control policies and procedures, as well as the need for experienced servicing of our records and reconciliations of the same, and plan to vigorously pursue the remediation of these two items straight away.

Our board, being this our first audit and testing of our records and keeping of them, are proud to know that the staff was available to your team and provided written documentation and records to each of your requests. Also, being a staff of under 5, with such a large footprint, having only 2 areas to focus on recovery and improvement, your audit provided us a path to further success.

We thank you for your diligence and we look forward to bettering our board based on this assessment.

Very Truly,

Joseph A. Marino (Treasurer) Page 2

Direct Response to findings:

Reference Number: 2017-001

The board plans to retain a professional Certified Accounting firm in order to properly track expenses and to have our in house staff record, in great detail, the extent of which expense is subject to particular grants, and the board is looking to institute project management software (eProperties Plus) that will closely track and tie expenditures to specific properties and be able to provide detailed reports to staff, the Board and the general public

Reference Number: 2017-002

The board plans to review our policies and procedures in terms of Grant Disbursements and requests, but find no deficiencies in the timing on our end, as the cash flow came from the disbursement of the grant, not the timing of the request.

Reference Number: 2017-003

The board plans to review our policies and procedures in terms of Grant expenses and timing of the same and write in new procedures, if necessary, to curb any further issues.

Reference Number: 2017-004

The board plans to review our policies and procedures in terms of Grant expenses and timing of the same and write in new procedures, if necessary, to curb any further issues.

Reference Number: 2017-005

The board will authorize the retention of professional services of a certified public accounting firm with the express experience in government and not-for-profit accounting to assist our minimal staff.