

WHITEHALL GROUP, LLC

February 25, 2016

Private and Confidential

City of Allen Park
Attention: Mr. Mark Kibby, City Administrator
Attention: Mr. Robert Cady, Finance Director
16630 Southfield Road
Allen Park, Michigan 48101

RE: Interim Draft Report of Findings

Gentlemen:

Introduction

The Report is being issued pursuant to the work of the Whitehall Group LLC (“WHG”) that has been undertaken in accordance with the Project Objectives (*Section VII of the request for quotation*) as defined within the City of Allen Park (“City”) request for proposal responded to on July 14, 2015 by WHG. This work was primarily performed in line with a kick off meeting on November 6, 2015 and a personnel interview process completion on November 19, 2015.

Our report is organized first in a manner reflective, of the *Functional Organization* delineation with *General Observations*, including discussion *Operating Practices* exhibited within the functional organization departments (*Attached as Exhibit A*) hereto. In addition, certain *Benchmarking Information* is included herein (*Attached as Exhibit B*), and addressed as a separate section of this document. Lastly we have included herein a summary of the *Consensus Top 5 Items for action* (*Attached as Exhibit C*) with approximate timing and identified sub-tasks related thereto.

Functional Organization

As discussed on November 6, 2015, we have split departments as follows to reflect natural groupings within direct service providers of critical services to the residents of Allen Park and support functions primarily charged with aggregating and documenting and supporting such critical service functions as well as administrative functions related to overseeing revenue and costs of operating the City. Our review encompassed discussions with department heads responsible for each of the departments listed below, with results if such discussions included in Exhibits (described above) attached hereto.

Direct Service Interface Departments:

- **Public Safety**
 - Police,
 - Fire/EMS/Paramedic,
- **Maintenance and Permitting**
 - Department of Public Works,
 - Building Department
- **Quality of Life**
 - Parks, Recreation and Community Center

Internally Aligned Support and Primarily Administrative Functions:

- **Aligned via strong internal and external customer commonality or reliance upon each other:**
 - City Clerk (Elected Position)
 - City Treasurer (Elected Position)
 - Assistant Assessor (Assessor is a Contracted Position)
- **Internal (administrative) support:**
 - Administration
 - Including HR/Purchasing
 - Finance

Departments/Areas not addressed:

- Mayor
- City Council
- 24th District Court
- Library
- DDA

In the performance of interviews and corresponding responsibilities analysis of the “Direct Service Interface” departments and “Internal Support Activities” departments there were certain overriding observations applicable both departmentally and on a city wide basis.

General Observations

The City has reduced total and departmental personnel and aligned staffing pursuant to directions of the Emergency Manager in a manner that allows continuation of services within the current financial capabilities of the City:

- These cuts may be to an extent that requires re-staffing;
 - In almost every department, Directors indicated a need for some form of re-staffing, or alignment of shared resources.
- As more fully discussed within the ***Key Strategic Observations*** section of this report, and contingent upon Metrics related to functional areas:
 - The City can then evaluate resource requirements within a better defined organization with more fully developed job responsibility assignments, and job and process definitions.

With respect to supporting information systems:

- It appears that with the updates recently made to the BS&A system, and the additions of “Pictometry” and “I Look About” software the City has undertaken steps to improve efficiency, interdepartmental communication capability and quality of information related to tracking of key services to the community:
 - ***Notwithstanding these examples, there may be a need for enhanced internal IT staffing to support system enhancements and refinements in other areas reliant upon computer services, such as business systems, purchasing, human resources and etcetera.***

- The enhancements to BS&A (in service July 1, 2015) have streamlined information flow between and amongst the Assessor and Treasury functions reducing time and increasing accuracy related to tax rolls, tax bill preparation and data entry related to collections
 - This allows for planned Deputy Assessor budget reductions as well and a potential for future (next election) requirements within the elected Treasurer Role,
 - Enhanced bar coding described by the Building Department has streamlined the process of interface of paperwork presented with permit fees collected at the Treasurer function,
 - Enhanced utilization of integrated permit and inspection information could increase efficiency related to assessment changes, and
 - Additional opportunities appear to exist with respect to business licensing and collections currently under the control of the Clerk's office:
 - BS&A/Personal Property Reports/Building and permits can create an integrated data base focused upon timeliness of identification of license revenue points.

With respect to facilities and equipment appropriateness and effective utilization thereof:

- We can concur with internal evaluations as to City Hall layout, functional flow could be improved to better facilitate information flow as well as customer service to the Residents,
- As to equipment utilization (as well as appropriateness for use), we understand functional leadership concerns about age and state of repair of almost all City equipment, and
- We are unable to evaluate the details and adequacy of capital spending budgets, due to limited scope and detail availability, at this time.

With respect to cross comparisons to benchmark communities, we have gathered information from SEMCOG and City Information that may be useful in an expanded scope and time frame for services, or of utility to the City Administrator.

Certain detailed information has been aggregated within *Exhibit B*. In this area we have also attempted to sort and aggregate financial data and headcount information with consideration of alignment of certain data of general fund and specific fund to allow for an equal comparison as certain municipalities categorize data in different manners.

We have determined the following data with respect to benchmark communities of Allen Park, Southgate, Madison Heights, Eastpointe and Oak Park.

NOTE, as each municipality provides different levels of service and aggregates data in somewhat different manners as between general and specific funds and retirement costs, data should be considered as directionally correct and the basis to begin conversations about development of best practices for Allen Park.

Financial Comparables-Functional Costs

	Allen Park		Average		Southgate		Madison Heights		Oak Park		Eastpointe	
	2015/2016	CPR	2014/2015	CPR	2014/2015	CPR	2014/2015	CPR	2014/2015	CPR	2014/2015	CPR
Extracted Comparable Groupings												
Council	\$ 43,700	2	\$ 55,394	2	\$ 36,440	1	\$ 53,422	2	\$ 85,797	3	\$ 45,918	1
Court	1,653,921	59	1,462,631	48	1,046,855	35	1,471,453	50	1,986,000	67	1,346,214	41
	1,697,621	60	1,518,025	50	1,083,295	36	1,524,875	51	2,071,797	70	1,392,132	43
City Hall /Administrator	412,099	15	362,604	12	228,184	8	331,284	11	377,593	13	513,353	16
General Admsintration	2,017,918	72	2,380,787	78	2,152,256	72	3,239,381	109	2,197,085	74	1,934,426	59
	2,430,017	86	2,743,391	90	2,380,440	79	3,570,665	120	2,574,678	87	2,447,779	75
Pubic Safety	8,330,568	295	10,274,230	336	10,009,885	333	13,180,766	444	6,237,083	210	11,669,184	358
Building and DDA	881,624	31	925,578	30	501,574	17	1,113,720	38	880,639	30	1,206,377	37
DPS	1,240,029	44	1,371,012	45	2,539,355	85	1,075,299	36	889,419	30	979,974	30
Sanitation	1,710,971	61	1,934,058	64	1,436,279	48	1,968,176	66	2,524,068	85	1,807,709	55
	3,832,624	136	4,230,647	139	4,477,208	149	4,157,195	140	4,294,126	144	3,994,060	122
Parks, Rec and Comm Ctr	1,112,241	39	879,038	29	949,136	32	1,140,416	38	837,047	28	589,551	18
Library	750,094	27	746,989	24	572,683	19	728,632	25	795,000	27	891,640	27
	1,862,335	66	1,626,026	53	1,521,819	51	1,869,048	63	1,632,047	55	1,481,191	45
Retiree (estimated)	3,009,433	107	1,428,555	62	2,634,700	88	In Payrolls		1,755,832	59	1,323,687	41
Extracted Totals	21,162,598	750	21,820,873	731	22,107,347	736	24,302,549	818	18,565,563	625	22,308,033	684
Total "Costs" Analyzed	21,662,598	768	22,055,152	723	22,691,522	755	24,655,491	830	18,565,563	625	22,308,033	684
Demographics												
Population	28,210		30,522		30,047		29,694		29,719		32,627	
Cost per resident	\$ 768		\$ 723		\$ 755		\$ 830		\$ 625		\$ 684	
Latest Tax Base(millions)	\$ 763.53		\$ 572.80		\$ 653.00		\$ 773.73		\$ 443.07		\$ 421.40	

Conclusion: on a cost per resident basis, critical categories of Public Safety Allen Park appears to have the lowest cost per resident, but other municipalities have varying amounts of retiree benefits included within the respective departments, as well as varying configurations (Oak Park combined Police & Fire with cross over of responsibilities)

It is not possible to differentiate or equalize such benefit impact at this time

Note also, that certain costs reflected are included in funds other than the general fund to varying extents and such costs have been included to approximate estimation of total costs by extraction and inclusion of appropriate costs to the extent identifiable.

Lastly, an average of the 4 cities, other than Allen Park, is included for additional comparisons. Such data should be viewed with consideration that averaging dissimilar aggregations may result in improper conclusions.

Personnel Comparables and Cost and Headcount Comparisons

	Personnel Statistics-March 2013 SEMCOG Data											
	Allen Park		Average w/o Allen Park		Southgate		Madison Heights		Oak Park		Eastpointe	
	FT	PT			FT	PT	FT	PT	FT	PT	FT	PT
Financial Administration	5	-	9	3	8	4	10	4	11	-	7	2
Other Government Administration	4	9	10	4	14	1	6	9	9	2	10	2
Judicial & Legal	15	6	11	3	10	3	8	4	16	3	10	3
Police Protection-Officers	38	-	44	-	39	-	44	-	51	-	40	-
Police Protection-Other	2	3	5	16	4	13	2	16	8	12	4	23
Firefighters	22	-	18	-	27	-	21	-	-	-	22	-
Firefighter-other	2	-	1	-	-	-	1	-	-	-	1	-
Correction	-	-	1	1	1	3	1	1	3	-	-	-
Streets & Highways	8	-	12	3	11	4	8	-	20	6	9	-
Welfare	-	-	1	3	1	6	1	5	2	-	-	-
Health	-	-	1	-	1	-	-	-	3	-	-	-
Solid Waste Management	1	-	-	-	-	-	-	-	-	-	-	-
Sewerage	2	-	3	1	2	-	3	3	-	-	8	-
Parks & Recreation	1	8	4	26	2	45	5	9	4	16	4	34
Housing & Community Development (Local)	3	2	3	-	-	-	10	-	-	-	-	-
Water Supply	7	-	2	1	-	1	4	-	2	2	-	-
Local Libraries	-	14	3	10	2	9	3	11	4	12	4	8
Other	1	-	7	5	4	16	11	-	4	-	8	3
Total	111	42	132	74	126	105	138	62	137	53	127	75
Annual Payroll	6,787,968	365,736	8,322,339	661,080	8,087,880	845,388	8,221,836	612,540	9,115,512	525,204	7,864,128	661,188
Per Employee	61,153	8,708	63,057	9,164	64,190	8,051	59,579	9,880	66,537	9,910	61,922	8,816
Total Payroll	7,153,704		8,385,396		8,933,268		8,834,376		9,640,716		8,525,316	
Per Resident	254		275		297		298		324		261	
Current MML Information											Local Information	
Full time	100		Average 163		150		190		161		150	estimated
Population	28,210		30,522		30,047		29,694		29,719		32,627	
Tax Base	763,534,000		572,799,500		653,000,000		773,730,000		443,068,000		421,400,000	
Per 10,000 population	35.45		53.5		49.92		63.99		54.17		45.97	

Conclusion, payroll per resident in 2013 SEMCOG data base, as reported to and categorized by SEMCOG would indicate on a directional basis that personnel costs per resident are lowest within Allen Park, but such a conclusion would be tempered by level of services provided, mix and type of services and how reported by the respective municipalities

Conclusion, it appears that employees per 10,000 of population are the lowest within Allen Park as based upon MML information (current period) and estimated Eastpointe data.

While such information may be useful in evaluating city to city budgets, it may not provide adequate information to allow process comparison due to cost categorization practice variance amongst municipalities.

Reliance upon benchmark city budgets or organizational structure has a value limited to providing directional information only, therefore:

We alternatively suggest a development of metrics more fully defined below in conjunction with job and process definitions to develop internal Allen Park best practices.

Current trends in compensation and benefits may be of more value than structural organization or spending details.

General considerations related to Internal and Regional Collaboration:

- Internal collaboration:
 - Evaluate further integration and reassignment of responsibilities of Clerk, Assessor, Treasurer and Finance activities,
 - Cross training Police to serve in Fire and EMT roles-Integration of Public Safety into a common function:
 - Evaluate desk personnel/sworn officers in city hall for road assignment, and
 - Reconfigure clerical staff sharing.
- Regional Collaboration:
 - The City has undertaken participation in:
 - Regional dispatch and 911 system (Note this has been identified as a potential resident complaint, regarding courtesy, knowledge and etcetera that must be verified as to frequency and severity),
 - Regional Animal Control,
 - Regional joint support agreements related to Fire Response, Hazardous Materials Response and Undercover Drug and Crime investigation, and
 - Outsourcing of Jail to Dearborn (City is investigating insourcing if new facility is built).
 - Additional opportunities may exist through a form of Downriver Council collaboration related to:
 - Enhanced assessor availability at a reduced cost via development of a common shared staff.
 - Consolidation of Police and Fire services of and between certain adjacent communities,
 - Common building, construction and fire inspector staffing in accordance with state codes and coordination of city codes amongst participants,
 - Combined local road contract bundling for cost negotiating power as well as administration of paving standards, and
 - Unified water and sewer administration to increased bargaining power with City of Detroit and Wayne County water and sewer departments.

Key Strategic Observations/ Issues/Actions (See also Appendix C for Top 5 Work plan:

Appointed and Elected Positions include Charter Definition of Roles, Responsibilities and Authority.

- ***Issue: Minimal delineated job process descriptions for salaried leadership and hourly support personnel (Charter definitions delineate responsibility but not methods of execution of tasks)***
 - ***Action:*** A corresponding need exists for the development and documentation that is process and flow focused:
 - This is required to support execution of responsibilities in a more formal and accountable manner.
 - ***Issue:*** Perceived lack of adequate staffing (qualified and capable) including full and part time personnel and potential inefficient deployment of personnel with multi-department responsibilities:
 - ***Action:*** Prepare/undertake a formalized process documentation related to and integrated with Charter and Job Description Definitions,

- **Action:** Evaluate staffing requirements in line with data ascertained from departmental metrics and service objectives of the City, and
- **Action:** Develop succession planning/staff development program to back fill positions or continue to go outside (this is a decision the City must address as to desired tactic).
- **Issue:** Inability to attract qualified new employee's resultant from or contributed to by the adverse residual effect of Emergency Manager and impact upon perceived viability and compensation structure/competitiveness.
 - **Action:** Initiate a coordinated HR-PR action to tell the Allen Park story
 - **Action:** Determine a responsible compensation package to give consideration to:
 - Base pay in line with MML studies,
 - Defined Contribution versus Defined Benefit Pensions, and
 - Competitive Health insurance premium cost sharing: and index employee withholding to future cost increases.
- **Issue:** Minimal succession planning, for example:
 - Finance Director**-3 to 5 years of remaining service, no back up personnel or plan,
 - Building Department Director**-2 to 3 years of remaining service, no back up personnel or plan,
 - Recent DPS internal promotion** with limited experience outside of previous department supervision role, and
 - Parks and Recreation Director**-an indeterminate years of remaining service, majority of first line staff is seasonal hires.
 - **Action:** Back up training for unplanned loss of personnel-cross training, and
 - **Action:** Given the time and service of many personnel falling into two general categories of high seniority approaching retirement and low seniority with limited exhibited experience or leadership roles, the City should embark upon a formal succession planning process for all departments and functions.
- **Issue:** Lack of a comprehensive delineation and staffing commensurate with refined responsibilities of support functions such as Human Resources, Purchasing, Finance and Administration;
 - **Action:** Reconfigure organizational responsibilities in line with suggestions below.

Departments/Activities with No Formal Staffing and Leaders are in Transition. The Charter defines Purchasing and Human Resources as single positon (likely should be split).

Human Resources Activity/Role

- **Issue:** Human resource functions with the majority of responsibility for discipline and enforcement assigned or authorized functions are too general with blurred lines between City Clerk's office, functional Department Directors and current direction as a sub function of the City Administrator:
 - **Action:** segregate HR roles and responsibilities along a more formal industry based model
 - Reassign conventional HR functions from Clerks office, for example:
 - Employee Retirement files,
 - Life insurance claims:

- Recruitment,
- Use HR to spearhead job and process description and documentation process, and
- Use HR to lead and coordinate succession planning monitoring.

Purchasing Activity/Role

- **Background:** Department Directors are appropriately responsible for development and maintenance of a capital spending plan(s) and, due to expertise, specification development and initial supplier identification is usually initiated within the requesting function(s).
- **Issue:** Charter requirement for process is controlled through Clerks office, with appropriate Council approval in line with buying limits without a control point for negotiation, bid process may not lead to adequate supplier negotiations:
 - **Action:** Expand to acquire Professional purchasing expertise–(potentially a part time position-retired professional) also see Grant Writing Below,
 - **Action:** Further formalize process, including standardization of bid process on capital items, and
 - **Action:** Consolidation and administration of certain City Clerk roles other than statutory postings and publishing required by charter should be realigned within purchasing.
- **Issue:** Stores items (e.g. stationary, light bulbs, cleaning supplies and etcetera) are purchased directly by user departments:
 - **Action:** Create selected supplier(s) and blanket PO approach similar to industry not municipal standards.

Grant Research and Writing

- **Issue:** Grants are individually researched and submitted from the user departments:
 - **Action: Grant Writing-create part time position or combine with purchasing to research, document and follow up for departments:**
 - Centralize and formalize, and
 - Remove disconnect (perceived or real) as relates to different prioritization within departments, and level of pursuit.

Public Safety

- **Issue: A critical and highly visible group of services provided by the City to its residents (Police, Fire and EMS/Paramedic).**

As the demographics of the city continue to evolve with minor population reductions between now and 2020, as well as a continuing aging of the population, the criticality of these services being delivered effectively and efficiently continues to increase:

- **Action:** Longer term public safety opportunity-investigate combining Police, Fire and EMT personnel through cross training and redeployment to optimize limited manpower and potentially reduce costs. Michigan is a leading state in combined Department of Public of Safety approach. A move of this type must be coordinated with an election initiative to

amend the Charter and must further be coordinated with the future expiration dates of Police and Fire Collective Bargaining Agreements.

Department of Public Works

- **Issue:** Garage and Maintenance Department ability to timely and adequately service Police, Fire and Safety Equipment as well as Water and Sewage delivery systems and City Equipment will/may require greater resources due to equipment age and funding constraints (reduced drug forfeitures, inflation compared to tax revenue slow growth);
 - **Action:** Investigate creating/enhancing participation in the downriver coalition to centralize motor vehicle and other mechanical equipment maintenance,
 - **Action:** See comments on Grant Writing for alternate to drug forfeiture, and
 - **Action:** Investigate sinking fund bond issue related to equipment replacement and sewer and water upgrade/major capital maintenance (note rate revisions contemplated in near future to reflect current cost recovery may provide capital funds for upgrades and maintenance).
- **Issue:** Road standards and bid development are controlled by a contracted service, selection is controlled by bid process and council approval:
 - **Action:** Investigate combination with other municipalities in area to enhance “bundle bidding” and contract awards larger in scope and thus bargaining power (see opportunities for collaboration above).
- **Issue:** Perceived or actual time and effort related to forestry (below the sidewalk maintenance):
 - **Action:** investigate bundling and outsourcing with a firm trimming schedule plus emergency major incidents (consider coordination with complete outsourcing of all trimming)
- **Issue:** Utilization of city personnel to make connections on new water service hook-up:
 - **Action:** Certain municipalities do not provide this service; rather it is the responsibility of the property owner and their contractors to perform the hook up, with city inspection only.

Building Department is primarily responsible for building permit issuance, inspections related thereto and ordinance enforcement officers:

- **Issue:** Perceived ability to deliver timely services
 - **Action:** Aggregate and evaluate metrics for decision as to personnel requirements

City Clerk, Treasurer and Assessor

- **Issue:** Similarity of services, high degree of overlap and realignment of responsibilities:

- **Action:** With respect to Clerk, Treasurer and Assessor an overall evaluation of work load and re-distribution of appropriate responsibilities, potentially to administration, human resources purchasing or finance should be undertaken with the objective of streamlining processes and reducing cost, and
- **Action:** Develop and coordinate meeting with Clerk, Treasurer and Assessor (and impact identification on building department and fire and police).

City Administrator

Roles and responsibility of the position result in a situation wherein the City Administrator, for purposes of this document, is considered to be the Chief Operating Officer of the City with the Mayor and Council effectively considered Chief Executive Officer and Board of Directors in a private sector environment:

- **Issue:** In addition to formal role as City Administrator the incumbent has also been charged with and given responsibility for Purchasing and Human Resources Functions:
 - **Action:** Purchasing and Human Resources are called out in in Charter description as single position, and
 - **Action:** See suggestions above related to development of formal HR and Purchasing activities.
- **Issue:** Director Requests are in line with suggestions and actions included also in other sections of this document For example:
 - **Actions** identified by Administrator:
 - Development of standard operating procedures and job descriptions (Not just city charter documents-they cover but do not provide direction on specifics of execution to employees),
 - Headcount (full or part time TBD) for Human Resources and Purchasing,
 - Succession Planning,
 - Strengthen certain departments heads due to MIOSHA/OSHA and lawsuits,
 - Has block grant experience, limited time or experience related to general grants, and
 - Heavier involvement of Downtown Development Authority.

Finance Director

Roles and responsibility of the position result in a situation wherein the Finance Director, for purposes of this document, is considered to be the Chief Financial Officer of the City , responsible for all financial accounting, reporting, revenue collection, disbursements, tax filings investments, money management and etcetera per City Charter Definition

- **Issue:** Cost of outside contractor for professional services in lieu of internal staff capability:
 - **Action:** Minimize potentially extra cost that could better utilized on city employee(s) capable of providing source of succession planning and more effective activity related to certain treasurer and other roles

EXAMPLES OF ACTIONS TO CREATE FUNDS FOR ACTIONS / IMPROVEMENTS

Included below are quantifications of certain actions that could be undertaken to provide funding for staff redefinition and realignments. This is not all inclusive, as certain other actions have been included within other sections of this report.

Contractor versus Full or Part time hires:

- Plante Moran \$80,000 to \$85,000 per year-1 to 2 days per week
 - Evaluate services provided:
 - Reassign \$75,000 to \$85,000 of budget for qualified part time professionals into Finance, HR and Purchasing functions,
 - Creates capacity of 4,250 hours at \$25 per hour (FTE Equivalent of \$50,000 per year), and
 - Begin development of staff capable of succession.
- Assessor-\$85,000 per year-less than 3 days per month, plus City Employee at \$40,000 plus benefits of \$10,000 plus special counsel on Assessment issues of up to \$40,000 per year:
 - Evaluate Services Provided by Contract Assessor e.g. qualified sign-off on tax rolls and expert testimony related to primarily commercial tax appeals at cost of \$85,000 plus \$40,000 of expert appeals plus current deputy assessor at \$40,000 per year plus benefits of \$10,000:
 - Reassign dollars to a proper internal resource at a total cost of \$80,000 plus expert testimony at \$40,000 for a savings of \$55,000,
 - Consider alternatively, creation of a multi community group to ‘own’ rather than rent a proper assessing and appeal staff with a goal of similar savings, and
 - Utilize freed up funds for development of other staff requirements identified within this document.

Shared Resource Strategy (Dollar spend indeterminate at this time)

- Perform a full evaluation of shared and part time personnel to determine full time equivalents and effective/efficient deployment for facilitate optimization of individual departmental results contributing to better overall city results-financial and taxpayer satisfaction.
- Size of payroll pool is indeterminate at this time, but should be considered in right alignment and initiatives:
 - Shared resources result in blurred lines of authority and an inability to define accountability and execute effective delivery of job requirements, and
 - Part time personnel are lower cost alternative to full city employees, but may be impairing succession planning and quality of work.

Because of the time and scope of limitations implicit in this engagement, the depth of analysis and verification of data is significantly limited. Therefore, Whitehall has relied upon the accuracy and validity of the data disclosed to, or supplied by employees and representatives of the City of Allen Park and its respective team members.

Whitehall agrees to continue to keep confidential all information obtained from the City of Allen Park and its employees or representatives utilized in our engagement and the preparation of this report and other data provided. Whitehall agrees that it will not disclose to any other person or entity any information pertaining to the City of Allen Park that is non-public, confidential, or proprietary in nature which Whitehall obtains or is given access to during the performance of the services provided hereunder without the written consent of the City of Allen Park. Information available in the public domain is not subject to such confidentiality.

It is further understood that this written report or other information provided by Whitehall to the City of Allen Park will be marked as confidential and is for the use only of the City of Allen Park, and addresses included above. No other third party shall be provided copies or excerpts of any Whitehall reports without this legend.

We thank you for the opportunity to have assisted you in this important matter. We are available to continue to support your needs as they may arise.

Whitehall Group LLC

Joseph Bione
President

Gregory A. Bryen, Sr.

James Lenhardt