

# AUDIT REPORT



CITY OF NEW YORK  
OFFICE OF THE COMPTROLLER  
BUREAU OF FINANCIAL AUDIT  
**WILLIAM C. THOMPSON, JR., COMPTROLLER**

## **Audit Report on the Financial Practices of New York City Public/Private Initiatives, Inc., Doing Business as The Twin Towers Fund September 12, 2001–August 31, 2002**

*FN03-122A*

**June 26, 2003**



THE CITY OF NEW YORK  
OFFICE OF THE COMPTROLLER  
1 CENTRE STREET  
NEW YORK, N.Y. 10007-2341

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WILLIAM C. THOMPSON, JR.  
COMPTROLLER

**To the Citizens of the City of New York**

Ladies and Gentlemen:

In accordance with the audit authority granted to the Comptroller's Office by the New York State Attorney General's Office and the New York State Supreme Court, my office has examined the financial practices of the New York City Public/Private Initiatives, Inc., (NYCPPI) in regard to its administration of funds collected for the Twin Towers Fund (Fund). The Fund was created to provide support for the families of uniformed and other rescue workers who lost their lives or were severely injured in the September 11, 2001, terrorist attack. The audit assessed the adequacy of NYCPPI's internal controls over the recording and reporting of contributions and disbursements, and determined whether all contributions were distributed pursuant to the Fund's established criteria.

The results of our audit, which are presented in this report, have been discussed with NYCPPI officials, and their comments have been considered in preparing this report.

Audits such as this provide a means of ensuring that all moneys received from the public by private organizations are accurately accounted for, and that distributions are made in accordance with applicable rules and regulations.

I trust that this report contains information that is of interest to you. If you have any questions concerning this report, please contact my audit bureau at 212-669-3747 or e-mail us at [audit@Comptroller.nyc.gov](mailto:audit@Comptroller.nyc.gov).

Very truly yours,

A handwritten signature in cursive script that reads "William C. Thompson, Jr.".

William C. Thompson, Jr.

**Report:** FN03-122A  
**Filed:** June 26, 2003

## *Table of Contents*

AUDIT REPORT IN BRIEF	1
Audit Findings and Conclusions	1
Audit Recommendations	2
INTRODUCTION	3
Background	3
Objectives	3
Scope and Methodology	3
Scope Limitation	5
Discussion of Audit Results	5
FINDINGS AND RECOMMENDATIONS	6
Internal Control Weaknesses	6
Minor Issues Related to Benefit Payments	7
Recommendations	7
NYCPPI Response	7
ADDENDUM – NYCPPI Response	

***The City of New York  
Office of the Comptroller  
Bureau of Financial Audit***

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Financial Practices of  
New York City Public/Private Initiatives, Inc.,  
Doing Business as the Twin Towers Fund  
September 12, 2001–August 31, 2002**

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**AUDIT REPORT IN BRIEF**

New York City Public/Private Initiatives, Inc. (NYCPPI), a not-for-profit corporation, was formed for charitable and public purposes, including the promotion of the City as a business venue, encouraging economic development. NYCPPI receives City funding and raises additional funding from the private sector.

As a result of the September 11, 2001, terrorist attack, the Twin Towers Fund was created on September 12, 2001, to provide financial support to the family beneficiaries of the uniformed and other rescue workers who lost their lives in the attack. Until the Twin Towers Fund received New York State and Internal Revenue Service approval to operate as a charity, assets collected for the Twin Towers Fund were held by NYCPPI. In addition, NYCPPI collected donations concurrently with the Twin Towers Fund for several months after the Twin Towers Fund received such approval. Between December 2001 and August 2002, NYCPPI transferred \$107,934,625 to the Twin Towers Fund.

The audit assessed the adequacy of NYCPPI controls over revenues received and determined whether it distributed funds to beneficiaries in accordance with its established criteria and transferred all contributions and related interest earned to the Twin Towers Fund in accordance with the Charitable Asset Transfer Agreement.

**Audit Findings and Conclusions**

Based on our test of benefit payments, we are reasonably assured that the payments made to family beneficiaries were properly recognized and recorded in NYCPPI's books and records. In addition, NYCPPI had adequate controls in place to insure that payments to family beneficiaries were accurate, complete, and were in accordance with the established criteria. Although we are reasonably assured that all payments made to beneficiaries were proper, we noted that 12 beneficiary checks could not be accounted for. As of March 2003, we confirmed that none of the 12 checks had been cashed.

Because of internal control weaknesses and the absence of certain documentation, we could not determine whether NYCPPI accounted for all contributions received, whether

contributions were promptly and accurately deposited, and whether the correct amount of revenue was transferred to the Twin Towers Fund. Based on the available records, as of March 31, 2003, NYCPPI had at least \$107,637 in its checking account that had not yet been transferred to the Twin Towers Fund. In addition, we noted that one beneficiary is owed an additional \$10,000 and NYCPPI's books and records did not properly reflect a \$37,500 distribution.

Specifically, NYCPPI did not provide:

- 48 "Batch Deposit Folders" containing critical information including copies of contributors' checks and letters, and spreadsheets listing individual contributions, were not provided during the audit period.
- spreadsheets that listed the names, check numbers, and amounts of each contribution for 14 "Deposit Reconciliation Files."
- an individual listing of contributions within its cash receipts journal. Rather, the journal combined only four lump sum amounts—\$149,612,767, \$1,947,735, \$3,114,724, and \$5,477. Consequently, we were unable to trace the reported amounts to individual contributions recorded in the batch folders and reconciliation files.
- Bank Statements for its Money Market Investment Account. Consequently, we were unable to verify the accuracy of \$710,065 in interest recorded on NYCPPI's books and records.

In addition, we noted that Deposit Authorization Forms were not always reviewed and approved prior to the deposits. Specifically, 15 of 123 Deposit Authorization Forms we reviewed were approved by NYCPPI officials between two weeks and two months after the deposits were made. Nine other Deposit Authorization Forms were approved but were not dated. The timely review and approval of these forms provides further assurance that deposits are complete and accurate.

Subsequent to the issuance of the preliminary draft report, NYCPPI officials provided us the 48 Batch Deposit Folders. In addition, NYCPPI provided documents showing that the remaining \$107,649 was paid to the Twin Towers Fund, and that the books and records accurately reflect all interest earned on the Money Market Investment Account and the \$37,500 distribution.

Nevertheless, we have concerns about NYCPPI's record keeping practices, since it took approximately seven months for the organization to provide the requested documentation. Given that NYCPPI collected more than \$107 million on behalf of the victims of the September 11 attack, it is therefore critical that appropriate steps be taken to ensure that records are properly organized, safeguarded, and readily available for review.

### **Audit Recommendations**

We recommend that NYCPPI attempt to locate the remaining missing documentation cited in this report and use it to determine whether additional monies are due to the Twin Towers Fund. In addition, NYCPPI should inform the Twin Towers Fund that it should pay \$10,000 to the underpaid family beneficiary. Finally, NYCPPI should ensure that its records are properly organized, safeguarded, and readily available for review.

## **INTRODUCTION**

### **Background**

New York City Public/Private Initiatives, Inc. (NYCPPI), a not-for-profit corporation, was formed for charitable and public purposes, including promoting the City as a business venue; fostering, stimulating, and advancing commercial, trade, business and industrial interests in the City; and encouraging economic development in the City. NYCPPI receives City funding and raises additional funding from the private sector.

As a result of the September 11, 2001 terrorist attack, the Twin Towers Fund was created on September 12, 2001 to provide financial support to the family beneficiaries of the uniformed and other rescue workers who lost their lives in the attack.<sup>1</sup> Until the Twin Towers Fund received New York State and Internal Revenue Service approval to operate as a charity, assets collected for the Twin Towers Fund were held by NYCPPI. In addition, NYCPPI collected donations concurrently with the Twin Towers Fund for several months after the Twin Towers Fund received such approval. Between December 2001 and August 2002, NYCPPI transferred \$107,934,625 to the Twin Towers Fund.

According to the NYCPPI Statement of Revenue and Expenditures for the period ending June 30, 2002, NYCPPI received \$154,831,776 in contributions and earned \$710,065 in interest income. In addition, NYCPPI made direct payments to family beneficiaries totaling \$47,607,216.

### **Objectives**

Our audit objectives were to determine whether NYCPPI:

- Had adequate controls over revenues received to ensure that all contributions and other income were accurately recorded on its books and records and reported to the appropriate authorities;
- Distributed funds to beneficiaries in accordance with the established criteria; and
- Transferred all contributions specified for Twin Towers Fund and related interest earned in accordance with the Charitable Asset Transfer Agreement.<sup>2</sup>

### **Scope and Methodology**

To achieve our audit objectives, we evaluated NYCPPI controls over contribution and other revenue as well as its guidelines and procedures for distributing funds to family beneficiaries. We interviewed management personnel, conducted a walkthrough of the operations on October 18, 2002, and familiarized ourselves with NYCPPI's accounting and record keeping procedures. We documented our understanding of NYCPPI operations through narratives and memoranda.

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<sup>1</sup> We also conducted a separate audit of the Twin Towers Fund (Audit #FN03-103A) to determine whether all contributions it received were properly recorded, deposited, and distributed. The results of that audit are covered in a separate report.

<sup>2</sup> Under New York State's not-for-profit laws, a charity desiring to transfer a substantial amount of its assets must have the approval of the State Supreme Court to receive a Charitable Asset Transfer Agreement.

### **Contribution Revenue**

To determine whether NYCPPI accurately recorded its contribution revenues, we analyzed its cash receipts journal and general ledger from September 12, 2001, through June 30, 2002. However, the NYCPPI cash receipts journal contained only four entries to account for the amounts of contributions received. Therefore, we reviewed the NYCPPI Data Sheet, which listed individual contributions, check numbers, contribution amounts, and information linking individual contributors to bank deposits.

We randomly selected a sample of 203 contributions totaling \$7.1 million from the Data Sheet. We traced the individual contribution amounts to supporting documentation contained in the Batch Deposit Folder, which included copies of contributors' checks and letters, and a spreadsheet that listed each contribution. We then traced the amounts recorded on the spreadsheet, to the Deposit Reconciliation File, which included a copy of the bank deposit slip, an adding machine tape for the total deposit, and Deposit Authorization Form. Additionally, we compared the total on the Deposit Authorization Form to the deposit listed on the bank statement.

In addition, we determined whether NYCPPI had Batch Deposit Folders for all 545 deposits made during the audit period. We randomly selected 12 Batch Deposit Folders totaling \$11.9 million in contributions. We recalculated the contribution amounts in each of the 12 folders, compared the total number and amounts of the checks to NYCPPI's spreadsheets, and traced the number of checks and amounts to the deposit slips and to the Deposit Authorization Forms.

Finally, we randomly selected 200 contributions for \$10,000 or more totaling \$59 million and sent confirmation letters to each individual or corporate contributor. We requested detailed information about their individual contribution, including amounts, check numbers, and dates of their donations. Of 135 responses received, 132 matched NYCPPI's recorded information. The other three indicated an amount that was less than the amount listed on NYCPPI records. Nevertheless, we confirmed whether NYCPPI recorded those amounts correctly by reviewing copies of the checks from the contributors.

### **Benefits**

To determine whether benefit payments were made only to eligible beneficiaries, we compared the names of the individuals who received payments from NYCPPI to its Family Benefits Folders and to the proof of eligibility documents provided by unions and public agencies. To determine whether all families who were entitled to benefits received them, we matched the names that were provided by unions or agencies to the NYCPPI cash disbursement journal. We then reviewed documentation linking the recipients of the benefits to the deceased. Finally, by reviewing the bank statements, we determined whether all checks indicated as issued in the cash disbursement journal were cashed.

To determine whether the amounts paid to the beneficiaries were correct, we randomly selected 125 Family Benefit Folders, which contained copies of 226 checks issued to beneficiaries totaling \$13.9 million. We compared the amounts of the individual checks to the established criteria (spouse \$75,000; next-of-kin, when there is no spouse, \$50,000; a child 24

years and over, \$10,000; and a child under 24 years of age, \$25,000). In addition, we traced the 226 checks to the NYCPPI cash disbursements journal, general ledger and bank statements.

To determine whether all checks were accounted for, we listed all checks in sequential order. We then determined whether all check number gaps were the result of either voided checks or checks not cashed by the beneficiary. We examined NYCPPI's bank statements and voided checks to ensure that voided checks were not cashed.

### **Scope Limitation**

NYCPPI did not provide certain documents we needed to determine whether all contributions received were properly deposited in the bank and recorded on NYCPPI books and records. Specifically, NYCPPI did not provide: Batch Deposit Folders for 48 of 545 deposits during the audit period; a detailed cash receipts journal that listed individual contributions received; and, bank statements for its Money Market Investment Account. (These matters are discussed in the Internal Control Weaknesses section of this report.)

This audit was conducted in accordance with Generally Accepted Government Auditing Standards (GAGAS) and included tests of the records and other auditing procedures considered necessary. This audit was performed in accordance with the audit authority granted to the New York City Comptroller by the New York State Attorney General and the New York State Supreme Court.

### **Discussion of Audit Results**

The matters covered in this report were discussed with NYCPPI officials during and at the conclusion of this audit. A preliminary draft report was sent to NYCPPI officials and was discussed at an exit conference on May 28, 2003. On June 5, 2003, we submitted a draft report to NYCPPI officials with a request for comments. We received a response from NYCPPI on June 19, 2003.

NYCPPI officials generally agreed with the audit's findings and recommendations. In their response, NYCPPI officials provided reasons for the missing documentation and stated that they already implemented the audit's recommendations.

The full text of NYCPPI's comments is included as an addendum to this final report.



## FINDINGS AND RECOMMENDATIONS

Based on our test of benefit payments, we are reasonably assured that the payments made to family beneficiaries were properly recognized and recorded in NYCPPI's books and records. In addition, NYCPPI had adequate controls in place to insure that payments to family beneficiaries were accurate, complete, and were in accordance with the established criteria. Although we are reasonably assured that all payments made to beneficiaries were proper, we noted that 12 checks could not be accounted for, when we reviewed NYCPPI's bank statements to verify whether all checks with numbering gaps were either voided or not cashed by the beneficiaries. As of March 2003, we confirmed that none of the 12 checks had been cashed.

However, because of internal control weaknesses and the absence of certain documentation, we could not determine whether NYCPPI accounted for all contributions received, whether contributions were promptly and accurately deposited, and whether the correct amount of revenue, i.e., whether all donations and contributions were deposited into the Twin Towers Fund account and included in the transfer of funds to the Twin Towers Fund. Based on the available records, as of March 31, 2003, NYCPPI had at least \$107,637 in its checking account that had not yet been transferred to the Twin Towers Fund. In addition, we noted that one beneficiary is owed an additional \$10,000 and that NYCPPI's books and records did not properly reflect a \$37,500 distribution.

These matters are discussed in the following sections below.

### **Internal Control Weaknesses**

As previously stated, NYCPPI did not provide certain documents we needed to determine whether all contributions received were properly deposited in the bank and recorded on NYCPPI's books and records. Specifically, NYCPPI did not provide:

- **Batch Deposit Folders**: NYCPPI did not provide Batch Deposit Folders for 48 of 545 deposits during the audit period. As mentioned earlier, these folders contain critical information including copies of contributors' checks and letters, and spreadsheets listing individual contributions. Without such documentation, we were unable to confirm whether all contributions were accounted for on NYCPPI's books and records. According to NYCPPI officials the 48 folders were lost during relocation.
- **Complete Deposit Reconciliation Files**: Fourteen of 123 Deposit Reconciliation Files reviewed did not contain spreadsheets, which listed names, check numbers, and amounts of contributions received. Without such information we were unable to determine whether bank deposits included all contributions received.
- **An Itemized Cash Receipts Journal**: NYCPPI provided a cash receipts journal in which contributions were combined rather than listed individually. Specifically, the Journal contained four lump sum amounts—\$149,612,767, \$1,947,735, \$3,114,724, and \$5,477. Consequently, we were unable to trace the reported amounts to individual contributions recorded in the batch folders and reconciliation files.

- **Bank Statements for Its Money Market Investment Account.** NYCPPI did not provide us bank statements for its Money Market Investment Account. Consequently, we were unable to determine the accuracy of \$710,065 in interest recorded on NYCPPI's books and records.

In addition, we noted that Deposit Authorization Forms were not always reviewed and approved prior to the deposits. Specifically, 15 of 123 Deposit Authorization Forms we reviewed were approved by NYCPPI officials between two weeks and two months after the deposits were made. Nine other Deposit Authorization Forms were approved but were not dated. The timely review and approval of these forms provides further assurance that deposits are complete and accurate.

Subsequent to the issuance of the preliminary draft report, NYCPPI officials provided us the 48 Batch Deposit Folders. In addition, NYCPPI provided documents showing that the remaining \$107,649 was paid to the Twin Towers Fund, and that the books and records accurately reflect all interest earned on the Money Market Investment Account.

Nevertheless, we have concerns about NYCPPI's record keeping practices, since it took approximately seven months for the organization to provide the requested documentation. Given that NYCPPI collected more than \$107 million on behalf of the victims of the September 11 attack, it is therefore critical that appropriate steps be taken to ensure that records are properly organized, safeguarded, and readily available for review.

#### **Minor Issues Related to Benefit Payments**

We found that one beneficiary is owed \$10,000. NYCPPI paid a guardian of a beneficiary \$37,500; based on the payment guidelines the amount due was \$47,500. A review of the files disclosed that the beneficiary was not paid the \$10,000 "salary-to-pension transition payment" to which she was entitled. In addition, the NYCPPI general ledger did not include a \$37,500 distribution.

Subsequent to the issuance of the preliminary draft report, NYCPPI officials provided documentation that indicated that its books and records were adjusted to reflect the \$37,500 distribution.

#### **Recommendations**

NYCPPI should:

1. Attempt to locate the remaining missing documentation cited in this report and use it to determine whether additional monies are due the Twin Towers Fund.

**NYCPPI Response:** NYCPPI officials agreed, stating, "All funds received by PPI were properly deposited and then paid out to the beneficiaries or transferred to the Twin Towers Fund for later disbursement to beneficiaries. The draft audit indicated that from 123 deposit reconciliation files reviewed during the audit, 14 did not have spreadsheets included in them. This was the only missing documentation pointed out by the auditors in the draft audit report. It is also worth noting that the

spreadsheets were simply a summary document for the deposit reconciliation files. To address the draft audit report's recommendation, we have done an exhaustive review of all the deposit reconciliation files, and found that some of them did not include the summary spreadsheets. Our batch deposit files also had copies of the checks and the related correspondence, and all of the batch deposit files were sequentially numbered to match the corresponding deposit reconciliation files. Based upon our review, we are confident that all the checks received by PPI were deposited in PPI's TTF bank account.

"In order to complete the record, we undertook the task of making spreadsheets for those files that were missing them, and we verified that the deposits were accurate. Thus, for the historical record, the records are now complete. The spreadsheets that we compiled now are, of course, noted as such so it is clear when they were produced."

2. Inform Twin Towers Fund officials of the \$10,000 underpayment so that the Twin Towers Fund can make the appropriate payment.

**NYCPPI Response:** NYCPPI officials agreed and stated that "prior to the issuance of your draft audit, PPI notified the Twin Towers Fund of the underpayment. A copy of the email alerting the Twin Towers Fund to this and their reply are enclosed." [Because of the sensitive nature of the information, and with the agreement of NYCPPI officials, we did not include the e-mail as part of this response.]

3. Ensure that records are properly organized, safeguarded, and readily available for review.

**NYCPPI Response:** NYCPPI officials agreed and stated that "as part of the work being done in response to your first recommendation, PPI has been ensuring that all the deposit folders are in the proper order. PPI's offices were one block from the World Trade Center on September 11, 2001, and in the following year, PPI moved four times in response to the temporary shortage of office space caused by the World Trade Center disaster. Indeed, the final move for PPI took place in the month before your audit work began on site. Some of the files were temporarily misplaced during the moves, but PPI has retrieved them and put them back in order. PPI will certainly safeguard these records along with all of its files."

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June 19, 2003

JOEL A. GETZ  
PRESIDENT

Mr. Greg Brooks  
Deputy Comptroller  
Policy, Audits, Accountancy & Contracts  
The City of New York  
Office of the Comptroller  
1 Centre Street  
New York, NY 10007-2341

Dear Mr. Brooks,

Thank you for the opportunity to respond to the draft Audit Report on the Financial Practices of New York City Public/Private Initiatives, Inc. ("PPI"), Doing Business as The Twin Towers Fund (September 12, 2001-August 31, 2002).

My colleagues and I are pleased that your office determined that "payments made to family beneficiaries were properly recognized and recorded" and that PPI had adequate internal controls "to ensure that payments to family beneficiaries were accurate, complete" and "in accordance with established criteria."

The Twin Towers Fund ("TTF") was created in response to the unforeseeable and unprecedented tragic events of September 11, 2001. During the very difficult times following September 11<sup>th</sup>, PPI immediately began receiving and processing contributions to TTF. As you know, charitable contributions of the sort that PPI received are one-sided transactions. PPI did not know who was going to send in contributions, in what form they would arrive, nor in what number. Indeed, there were many ways to make contributions, including sending contributions to the Mayor's Office, City Hall, PPI, or other City entities; making wire transfers to PPI's TTF bank account; making donations via a 1-800 telephone number, which was coordinated by New York State; making walk-in deposits to any of the approximately 400 Chase Bank locations; sending checks to radio commentator Howard Stern, who was soliciting on TTF's behalf; making credit card donations that were collected through Howard Stern's organization; participating in eBay auctions that were raising money for TTF; and sending checks to a lockbox at the post office that were processed and deposited directly by Chase Bank. PPI's goal, therefore, was to make sure that every contribution coming in from any avenue was deposited in PPI's TTF bank account.

Recognizing the magnitude and scope of the work to be done, PPI management engaged the professional services of a major accounting firm to help develop the procedures, controls, and mechanisms to process the donations and to reconcile the

records. Examples of these controls were: keeping copies of all checks that were deposited, double-checking each deposit with spreadsheets and adding machine tapes, and retaining all correspondence that came with the checks. The procedures recommended by our accountants/project-management consultants ensured that contributions coming in through any of the mechanisms were handled properly so that all funds would be deposited on a timely basis. To be certain that the wishes of our many donors were honored completely, PPI did not charge any administrative expenses to TTF.

The staff of PPI worked long and diligently to ensure that the approximately 150,000 gifts totaling over \$154 million that came in during the months after the World Trade Center attacks were processed accurately so that contributions would be distributed to the families of the heroes expeditiously.

Over the course of seven months, Comptroller's Office personnel examined PPI's records at PPI's offices. Following that review, the draft audit contains three recommendations, two of which are related to record keeping and one of which involves a minor issue related to benefit payments. As discussed below, we are already implementing those recommendations.

**Recommendation #1:** Attempt to locate the remaining missing documentation cited in this report and use it to determine whether additional monies are due the Twin Towers Fund.

Status: **Recommendation implemented**

All funds received by PPI were properly deposited and then paid out to the beneficiaries or transferred to the Twin Towers Fund for later disbursement to beneficiaries. The draft audit indicated that from 123 deposit reconciliation files reviewed during the audit, 14 did not have spreadsheets included in them. This was the only missing documentation pointed out by the auditors in the draft audit report. It is also worth noting that the spreadsheets were simply a summary document for the deposit reconciliation files. To address the draft audit report's recommendation, we have done an exhaustive review of all the deposit reconciliation files, and found that some of them did not include the summary spreadsheets. Our batch deposit files also had copies of the checks and the related correspondence, and all of the batch deposit files were sequentially numbered to match the corresponding deposit reconciliation files. Based upon our review, we are confident that all the checks received by PPI were deposited in PPI's TTF bank account.

In order to complete the record, we undertook the task of making spreadsheets for those files that were missing them, and we verified that the deposits were accurate. Thus, for the historical record, the records are now complete. The spreadsheets that we compiled now are, of course, noted as such so it is clear when they were produced.

**Recommendation #2:** Inform Twin Towers Fund officials of the \$10,000 underpayment so that the Twin Towers Fund can make the appropriate payment.

Status: **Recommendation implemented**

Prior to the issuance of your draft audit, PPI notified the Twin Towers Fund of the underpayment. A copy of the email alerting the Twin Towers Fund to this and their reply are enclosed.

**Recommendation #3:** Ensure that the records are properly organized, safeguarded, and readily available for review.

Status: **Recommendation implemented**

As part of the work being done in response to your first recommendation, PPI has been ensuring that all the deposit folders are in the proper order. PPI's offices were one block from the World Trade Center on September 11, 2001, and in the following year, PPI moved four times in response to the temporary shortage of office space caused by the World Trade Center disaster. Indeed, the final move for PPI took place in the month before your audit work began on site. Some of the files were temporarily misplaced during the moves, but PPI has retrieved them and put them back in order. PPI will certainly safeguard these records along with all of its files. Additionally, some of the delay in providing certain documents may be attributable to the transition in PPI's leadership. As you are aware, my predecessor left PPI in October 2002, and I replaced the Acting President on April 1, 2003, which was after most of your office's review of PPI's documents was completed.

Thank you again for giving us the opportunity to respond to your audit. PPI was honored to have been entrusted with the task of assisting the families of the uniformed officers who perished in the World Trade Center, and PPI made sure that every dollar raised was either disbursed to those families or transferred to the Twin Towers Fund. I look forward to answering any further questions or comments you may have.

Sincerely,



Joel A. Getz

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