

*Financial Statement, Supplementary Information, and  
Report on Internal Control and Compliance*

**Kili/Bikini/Ejit Local Government**

*Year ended September 30, 2020  
with Report of Independent Auditors*



**Shape the future  
with confidence**

Kili/Bikini/Ejit Local Government

Financial Statement, Supplementary Information, and  
Report on Internal Control and Compliance

Year ended September 30, 2020

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## Report of Independent Auditors

The Honorable Mayor Tommy Irujiman Jibok  
Kili/Bikini/Ejit Local Government

### Report on the Financial Statement

We have audited the accompanying financial statement of the Kili/Bikini/Ejit Local Government (KBLGOV), which comprises the statement of cash receipts and disbursements for the year ended September 30, 2020, and the related notes to the financial statement.

### *Management's Responsibility for the Financial Statement*

Management is responsible for the preparation and fair presentation of this financial statement in accordance with the cash basis of accounting described in Note 2 to the financial statement; this includes determining that the cash basis of accounting is an acceptable basis for the preparation of the financial statement in the circumstances. Management is also responsible for the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error.

### *Auditor's Responsibility*

Our responsibility is to express an opinion on this financial statement based on our audit. We conducted our audit in accordance with auditing standards generally accepted in the United States (GAAS) and the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States (*Government Auditing Standards*). Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statement is free of material misstatement.

An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the financial statement. The procedures selected depend on the auditor's judgment, including the assessment of the risks of material misstatement of the financial statement, whether due to fraud or error. In making those risk assessments, the auditor considers internal control relevant to the entity's preparation and fair presentation of the financial statement in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the entity's internal control. Accordingly, we express no such opinion. An audit also includes evaluating the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluating the overall presentation of the financial statement.

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

### ***Opinion***

In our opinion, the financial statement referred to above presents fairly, in all material respects, the cash receipts and disbursements of KBLGOV for the year ended September 30, 2020, in accordance with the cash basis of accounting described in Note 2 to the financial statement.

### ***Basis of Accounting***

We draw attention to Note 2 of the financial statement, which describes the basis of accounting. The financial statement is prepared on the cash basis of accounting, which is a basis of accounting other than accounting principles generally accepted in the United States of America. Our opinion is not modified with respect to this matter.

### ***Emphasis-of-Matter***

#### ***Reporting Entity***

As discussed in Note 1 to the financial statement, the financial statement referred to above presents only the receipts and disbursements of Kili/Bikini/Ejit Local Government accounting records maintained by the KBLGOV Trust Liaison and Support Office and is not intended to present fairly the financial position and results of operations of the Kili/Bikini/Ejit Local Government in conformity with accounting principles generally accepted in the United States of America. Our opinion is not modified with respect to this matter.

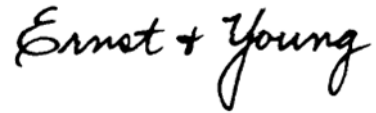
### ***Other Matters***

#### **Supplementary Information**

Our audit was conducted for the purpose of forming an opinion on the financial statement that collectively comprises KBLGOV's basic financial statement. The supplementary information, which comprises the Combining Statement of Cash Receipts and Disbursements for the year ended September 30, 2020 on page 9, is presented for purposes of additional analysis and is not a required part of the basic financial statement. Such information is the responsibility of management and was derived from and relates directly to the underlying accounting and other records used to prepare the basic financial statement. The information has been subjected to the auditing procedures applied in the audit of the basic financial statement and certain additional procedures, including comparing and reconciling such information directly to the underlying accounting and other records used to prepare the basic financial statement or to the basic financial statement themselves, and other additional procedures in accordance with GAAS. In our opinion, the supplementary information is fairly stated, in all material respects, in relation to the basic financial statement as a whole.

## **Other Reporting Required by *Government Auditing Standards***

In accordance with *Government Auditing Standards*, we have also issued our report dated January 23, 2026, on our consideration of KBLGOV's internal control over financial reporting and our tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements and other matters. The purpose of that report is solely to describe the scope of our testing of internal control over financial reporting and compliance and the results of that testing, and not to provide an opinion on the effectiveness of KBLGOV's internal control over financial reporting or on compliance. That report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering KBLGOV's internal control over financial reporting and compliance.

The logo for Ernst & Young, featuring the company name in a stylized, cursive script font.

January 23, 2026

# Kili/Bikini/Ejit Local Government

## Statement of Cash Receipts and Disbursements

Year ended September 30, 2020

|                                            |                   |
|--------------------------------------------|-------------------|
| Cash receipts:                             |                   |
| Distribution from Resettlement Trust Fund  | \$ 19,254,356     |
| Distribution from Bikini Claims Trust Fund | 4,630,989         |
| RMI deposits                               | 219,262           |
| Rental                                     | 117,338           |
| Shipping                                   | 109,719           |
| RMI Local Government Fund                  | 30,726            |
| Miscellaneous                              | 639,487           |
| Total cash receipts                        | <u>25,001,877</u> |
| Cash disbursements:                        |                   |
| Section 177 distribution payments          | 8,628,118         |
| Kili/Ejit projects                         | 3,876,311         |
| Salary payments                            | 3,827,514         |
| Social security/income tax                 | 1,075,674         |
| New housing project                        | 1,066,436         |
| Supplemental food purchases                | 952,830           |
| Travel                                     | 864,721           |
| Car/auto                                   | 781,379           |
| Solar project                              | 521,357           |
| Land project                               | 368,853           |
| Scholarships                               | 345,900           |
| Per diem                                   | 252,165           |
| Lease payments                             | 173,433           |
| Representation                             | 167,398           |
| Benefit payments                           | 161,676           |
| Housing                                    | 161,555           |
| Insurance                                  | 156,831           |
| Apartment building project                 | 130,344           |
| Investments                                | 105,000           |
| Education                                  | 66,508            |
| Bikini Day                                 | 62,519            |
| LGF expenditures                           | 37,800            |
| Telephone and fax                          | 35,062            |
| Audit fees                                 | 20,960            |
| KBE Annex                                  | 17,495            |
| Bank charges                               | 5,914             |
| Miscellaneous                              | 794,334           |
| Total cash disbursements                   | <u>24,658,087</u> |
| Net change in cash                         | <u>\$ 343,790</u> |

See accompanying notes.

# Kili/Bikini/Ejit Local Government

## Notes to Financial Statement

Year ended September 30, 2020

### 1. Organization

The Kili/Bikini/Ejit Local Government (KBLGOV) was established pursuant to Section 13(1) of the Local Government Act 1980, the Ordinance. KBLGOV is governed by an elected Mayor, Council members, and representatives.

The accompanying financial statement relates solely to those accounting records maintained by the KBLGOV Trust Liaison and Support Office located on Majuro Atoll and does not incorporate any accounts related to the Bikini Claims Trust Fund, the Bikini Resettlement Trust Fund, or any other departments or agencies of KBLGOV that may be accounted for outside of the KBLGOV Trust Liaison and Support Office.

The KBLGOV Trust Liaison and Support Office is responsible for the day-to-day administration of KBLGOV operations on Majuro Atoll. The Trust Liaison and Support Office maintains several bank accounts to function in this capacity. These bank accounts are comprised of the following:

- Section 177 Distribution Account - accounts for the receipts and disbursements of quarterly distribution payments in accordance with Article II of the Agreement between the Government of the United States and the Government of the Republic of the Marshall Islands (RepMar) for Implementation of Section 177 of the Compact of Free Association (the Compact) (the Agreement).
- Council Account - accounts for the receipts of rebates received from the Fund Manager, UBS. The Council is allowed to use a certain percentage of the Claims Trust Fund and the Resettlement Trust Fund to pay for the commission. The commission is set at a certain amount and once it has reached that amount, anything over that is remitted to the Council to be used for whatever the Council decides. The Council Account also receives funds from RepMar's Local Government Fund.
- Revenue Account - accounts for the receipts and disbursements of funds received from diver visits and other local revenue activities deposited into the account such as payment of electricity and water from the U.S. Department of Energy for personnel who are stationed on Bikini Atoll.
- Purchasing Account - accounts for the receipts and disbursements of the USDA food program that is received by the Ministry of Finance on a quarterly basis and passed through to KBLGOV.
- Operations Account - accounts for the receipts and disbursements of funds received from the Resettlement Trust Fund to pay for general KBLGOV operations.

# Kili/Bikini/Ejit Local Government

## Notes to Financial Statement, continued

### 1. Organization, continued

- Labor Account - accounts for the receipts and disbursements of funds received from the Resettlement Trust Fund to pay for certain KBLGOV payroll costs.
- Bikini Projects Department Account - accounts for the receipts and disbursements of funds received from the Resettlement Trust Fund to pay for certain KBLGOV living costs for Bikinians living on the islands of Kili and Ejit.

In addition to the above accounts, KBLGOV maintains the following investment trust funds:

- Bikini Claims Trust Fund - accounts for funds received under Article II, Section 2, of the Agreement.
- Bikini Resettlement Trust Fund - accounts for United States Congress appropriations under United States Public Law 97-257 to assist in the resettlement of Kili Island by the people of Bikini.

These investment accounts are separately maintained by a trustee located in the United States of America.

#### *Bikini Claims Trust Fund:*

The Bikini Distribution Authority (the Distribution Authority) was established pursuant to Section 177 of the Compact. The Distribution Authority was established to satisfy requirements of the Agreement. Article III of the Agreement establishes KBLGOV as the Distribution Authority.

Section 177(c) of the Compact provides, on a one-time grant basis, the amount of \$150,000,000 to RepMar to be used to establish a trust fund from which annual distributions are to be made in accordance with Article II of the Agreement. Pursuant to the Agreement, RepMar established the Nuclear Claims Trust Fund (NCTF) from which these distributions are made. The Distribution Authority is to receive \$75,000,000 from the NCTF, in payment of claims arising out of the Nuclear Testing Program for loss or damage to property of or personal injury to the people of Bikini, to be disbursed in quarterly amounts of \$1,250,000, commencing one calendar quarter after the effective date (October 21, 1986) of the Compact. These funds shall be distributed, placed in trust or otherwise invested as the Distribution Authority may determine consistent with the Agreement. Accordingly, the Distribution Authority established the Bikini Claims Trust Fund. Pursuant to the Bikini Claims Trust Fund agreement, the trustee, upon receipt of each quarterly payment, distributes 48% to the Distribution Authority, for distribution to the people of Bikini. These distributions are based on an approved distribution scheme. The remaining 52% is retained and added to the corpus of the Bikini Claims Trust Fund.

# Kili/Bikini/Ejit Local Government

## Notes to Financial Statement, continued

### 1. Organization, continued

#### *Bikini Claims Trust Fund, continued:*

The trust agreement was amended on July 25, 2002 (retroactive to the quarter ending March 31, 2002) to allow for quarterly distributions to the Distribution Authority at the rate of 1.25% of the average market value of the Bikini Claims Trust Fund for the previous three fiscal years.

The trust agreement was further amended in August of 2005 to allow for a 3% distribution in lieu of the 1.25% quarterly distribution in the event of an unforeseen natural disaster or other similar circumstance to occur no more frequently than every three years, provided the value of the trust fund has increased as of the preceding fiscal year ends.

#### *Bikini Resettlement Trust Fund:*

The Resettlement Trust Fund for the People of Bikini was established by the U.S. Congress under Public Law No. 97-257 on October 16, 1982, and a trust agreement approved by the people of Bikini and the Secretary of the Interior effective October 18, 1982. The trust agreement was amended on October 26, 1988, to comply with Public Law No. 100-446.

### 2. Basis of Accounting

The KBLGOV Trust Liaison and Support Office's policy is to maintain its accounts and prepare its financial statement on the cash basis of accounting. Cash basis of accounting is a special purpose framework, and similar to other bases such as tax, regulatory and contractual, use a definitive set of logical, reasonable criteria that is applied to all material items appearing in the financial statements. The cash, tax, regulatory, and other bases of accounting are commonly referred to as other comprehensive basis of accounting.

The cash basis differs from accounting principles generally accepted in the United States of America (GAAP) primarily because receipts/revenues are recognized when received rather than when earned and disbursements/expenses are recognized when paid rather than when the obligation is incurred. The American Institute of Certified Public Accountants (AICPA) issues nonauthoritative guidance and best practices in the form of Practice Aids.

The financial statement is presented in US Dollars, which is the KBLGOV Trust Liaison and Support Office's functional and presentation currency.

### 3. Budget Process

The Constitution of KBLGOV stated that "no taxes shall be imposed, and no other revenue shall be raised, and no money of the Local government shall be expended unless authorized by Law".

# Kili/Bikini/Ejit Local Government

## Notes to Financial Statement, continued

### 4. Distribution from the Trust Funds

During the year ended September 30, 2020, distribution payments of \$8,628,118 were paid to the people of Bikini, on a per capita basis, based on a distribution scheme approved by KBLGOV.

During the year ended September 30, 2020, the following distributions were made from the Bikini Claims Trust Fund and the Resettlement Trust Fund for the purpose of funding distribution payments to the people of Bikini:

#### Bikini Claims Trust Fund:

##### 1.25% distributions from corpus:

|                   |             |
|-------------------|-------------|
| November 4, 2019  | \$1,157,747 |
| February 26, 2020 | 836,000     |
| April 30, 2020    | 137,242     |

##### Special distributions:

|                   |                  |
|-------------------|------------------|
| November 13, 2019 | <u>2,500,000</u> |
|                   | <u>4,630,989</u> |

#### Resettlement Trust Fund:

##### 1.25% distributions from corpus:

|                 |         |
|-----------------|---------|
| April 30, 2020  | 699,000 |
| August 27, 2020 | 836,242 |

##### Special distributions:

|               |                  |
|---------------|------------------|
| June 25, 2020 | <u>2,000,000</u> |
|               | <u>3,535,242</u> |

\$8,166,231

# Kili/Bikini/Ejit Local Government

## Combining Statement of Cash Receipts and Disbursements

Year ended September 30, 2020

|                                            | Section 177<br>Distribution<br>Account | Council<br>Account | Revenue<br>Account | Operations<br>Account | Labor<br>Account | BPD<br>Account | USDA<br>Purchasing<br>Account | Total         |
|--------------------------------------------|----------------------------------------|--------------------|--------------------|-----------------------|------------------|----------------|-------------------------------|---------------|
| Cash receipts:                             |                                        |                    |                    |                       |                  |                |                               |               |
| Distribution from Resettlement Trust Fund  | \$ 3,535,242                           | \$ ---             | \$ ---             | \$ 15,719,114         | \$ ---           | \$ ---         | \$ ---                        | \$ 19,254,356 |
| Distribution from Bikini Claims Trust Fund | 4,630,989                              | ---                | ---                | ---                   | ---              | ---            | ---                           | 4,630,989     |
| RMI deposits                               | ---                                    | ---                | ---                | ---                   | ---              | ---            | 219,262                       | 219,262       |
| Rental                                     | ---                                    | ---                | 117,338            | ---                   | ---              | ---            | ---                           | 117,338       |
| Shipping                                   | ---                                    | ---                | 109,719            | ---                   | ---              | ---            | ---                           | 109,719       |
| RMI Local Government Fund                  | ---                                    | 30,726             | ---                | ---                   | ---              | ---            | ---                           | 30,726        |
| Miscellaneous                              | 38,961                                 | 2,941              | 13,225             | ---                   | 452,232          | 132,128        | ---                           | 639,487       |
| Total cash receipts                        | 8,205,192                              | 33,667             | 240,282            | 15,719,114            | 452,232          | 132,128        | 219,262                       | 25,001,877    |
| Cash disbursements:                        |                                        |                    |                    |                       |                  |                |                               |               |
| Section 177 distribution payments          | 8,628,118                              | ---                | ---                | ---                   | ---              | ---            | ---                           | 8,628,118     |
| Kili/Ejit projects                         | ---                                    | ---                | ---                | 1,861,678             | 392,092          | 1,622,541      | ---                           | 3,876,311     |
| Salary payments                            | ---                                    | ---                | 7,000              | ( 657 )               | 3,241,032        | 580,139        | ---                           | 3,827,514     |
| Social security/income tax                 | ---                                    | ---                | 12,976             | ---                   | 852,592          | 210,106        | ---                           | 1,075,674     |
| New housing project                        | ---                                    | ---                | 92,990             | 783,817               | ---              | 189,629        | ---                           | 1,066,436     |
| Supplemental food purchases                | ---                                    | ---                | ---                | 816,809               | ---              | ---            | 136,021                       | 952,830       |
| Travel                                     | ---                                    | ---                | ---                | 864,721               | ---              | ---            | ---                           | 864,721       |
| Car/auto                                   | 180,590                                | ---                | ---                | 600,789               | ---              | ---            | ---                           | 781,379       |
| Solar project                              | ---                                    | ---                | ---                | 521,357               | ---              | ---            | ---                           | 521,357       |
| Land project                               | ---                                    | ---                | ---                | 368,853               | ---              | ---            | ---                           | 368,853       |
| Scholarships                               | ---                                    | ---                | ---                | 345,900               | ---              | ---            | ---                           | 345,900       |
| Per diem                                   | 15,350                                 | ---                | ---                | 236,815               | ---              | ---            | ---                           | 252,165       |
| Lease payments                             | ---                                    | ---                | ---                | 173,433               | ---              | ---            | ---                           | 173,433       |
| Representation                             | ---                                    | ---                | ---                | 162,398               | 5,000            | ---            | ---                           | 167,398       |
| Benefit payments                           | ---                                    | ---                | ---                | 161,676               | ---              | ---            | ---                           | 161,676       |
| Housing                                    | ---                                    | ---                | 8,250              | 15,155                | 138,150          | ---            | ---                           | 161,555       |
| Insurance                                  | ---                                    | ---                | ---                | 156,831               | ---              | ---            | ---                           | 156,831       |
| Apartment building project                 | ---                                    | ---                | 35,781             | 34,104                | ---              | 60,459         | ---                           | 130,344       |
| Investments                                | ---                                    | ---                | ---                | 105,000               | ---              | ---            | ---                           | 105,000       |
| Education                                  | ---                                    | ---                | ---                | 66,208                | 300              | ---            | ---                           | 66,508        |
| Bikini Day                                 | ---                                    | ---                | ---                | 62,519                | ---              | ---            | ---                           | 62,519        |
| LGF expenditures                           | ---                                    | 37,800             | ---                | ---                   | ---              | ---            | ---                           | 37,800        |
| Telephone and fax                          | ---                                    | ---                | 717                | 34,345                | ---              | ---            | ---                           | 35,062        |
| Audit fees                                 | ---                                    | ---                | ---                | 20,960                | ---              | ---            | ---                           | 20,960        |
| KBE Annex                                  | ---                                    | ---                | ---                | 17,495                | ---              | ---            | ---                           | 17,495        |
| Bank charges                               | 183                                    | 120                | 39                 | 5,304                 | 253              | ---            | 15                            | 5,914         |
| Miscellaneous                              | 11,944                                 | ---                | 5,854              | 739,225               | ---              | 18,741         | 18,570                        | 794,334       |
| Total cash disbursements                   | 8,836,185                              | 37,920             | 163,607            | 8,154,735             | 4,629,419        | 2,681,615      | 154,606                       | 24,658,087    |
|                                            | ( 630,993 )                            | ( 4,253 )          | 76,675             | 7,564,379             | ( 4,177,187 )    | ( 2,549,487 )  | 64,656                        | 343,790       |
| Cash transfers:                            |                                        |                    |                    |                       |                  |                |                               |               |
| Transfers in                               | 500,000                                | ---                | ---                | 100,000               | 4,410,000        | 2,640,666      | ---                           | 7,650,666     |
| Transfers out                              | ( 100,000 )                            | ---                | ---                | ( 7,550,666 )         | ---              | ---            | ---                           | ( 7,650,666 ) |
|                                            | 400,000                                | ---                | ---                | ( 7,450,666 )         | 4,410,000        | 2,640,666      | ---                           | ---           |
| Net change in cash                         | \$( 230,993 )                          | \$( 4,253 )        | \$ 76,675          | \$ 113,713            | \$ 232,813       | \$ 91,179      | \$ 64,656                     | \$ 343,790    |

## Report of Independent Auditors on Internal Control Over Financial Reporting and on Compliance and Other Matters Based on an Audit of Financial Statements Performed in Accordance with *Government Auditing Standards*

The Honorable Mayor Tommy Irujiman Jibok  
Kili/Bikini/Ejit Local Government

We have audited, in accordance with the auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards* issued by the Comptroller General of the United States, the financial statement of the Kili/Bikini/Ejit Local Government (KBLGOV), which comprises the statement of cash receipts and disbursements for the year ended September 30, 2020, and the related notes to the financial statement, and have issued our report thereon dated January 23, 2026.

### **Internal Control over Financial Reporting**

In planning and performing our audit of the financial statement, we considered KBLGOV's internal control over financial reporting (internal control) as a basis for designing audit procedures that are appropriate in the circumstances for the purpose of expressing our opinion on the financial statement, but not for the purpose of expressing an opinion on the effectiveness of KBLGOV's internal control. Accordingly, we do not express an opinion on the effectiveness of KBLGOV's internal control.

*A deficiency in internal control* exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct misstatements on a timely basis. A *material weakness* is a deficiency, or a combination of deficiencies, in internal control, such that there is a reasonable possibility that a material misstatement of the entity's financial statements will not be prevented, or detected and corrected, on a timely basis. A *significant deficiency* is a deficiency, or a combination of deficiencies, in internal control that is less severe than a material weakness yet important enough to merit attention by those charged with governance.

Our consideration of internal control was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control that might be material weaknesses or significant deficiencies and therefore, material weaknesses or significant deficiencies may exist that have not been identified. We did identify certain deficiencies in internal control, described in the accompanying Schedule of Findings and Responses as items 2020-001 through 2020-003 that we consider to be material weaknesses.

## **Compliance and Other Matters**

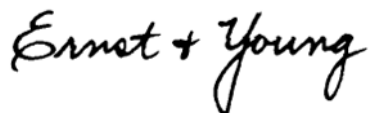
As part of obtaining reasonable assurance about whether KBLGOV's financial statement is free from material misstatement, we performed tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements, noncompliance with which could have a direct and material effect on the determination of financial statement amounts. However, providing an opinion on compliance with those provisions was not an objective of our audit, and accordingly, we do not express such an opinion. The results of our tests disclosed no instances of noncompliance or other matters that are required to be reported under *Government Auditing Standards*.

## **KBLGOV's Response to Findings**

KBLGOV's responses to the findings identified in our audit are described in the accompanying Schedule of Findings and Responses. KBLGOV's responses were not subjected to the auditing procedures applied in the audit of the financial statement and, accordingly, we express no opinion on them.

## **Purpose of this Report**

The purpose of this report is solely to describe the scope of our testing of internal control and compliance and the results of that testing, and not to provide an opinion on the effectiveness of the entity's internal control or on compliance. This report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering the entity's internal control and compliance. Accordingly, this communication is not suitable for any other purpose.

The logo for Ernst & Young, featuring the company name in a stylized, handwritten-style script.

January 23, 2026

# Kili/Bikini/Ejit Local Government

## Schedule of Findings and Responses

Year ended September 30, 2020

Finding No.: 2020-001  
Area: Local Noncompliance - RMI Procurement Code

Criteria: The RMI Procurement Code states the following:

(a) Section 124 - unless otherwise authorized by law, all Government contracts (including local government Councils) shall be awarded by competitive sealed bidding.

(b) Section 127 - procurement of goods and services not exceeding \$25,000 may be made in accordance with small purchase procedures promulgated by RepMar's Policy Office. Small purchase procedures are those relatively simple and informal methods for securing services, supplies, or other property that do not cost more than \$25,000. RepMar's Ministry of Finance has previously declared that if small purchase procedures are used, price or rate quotations shall be obtained from three qualified sources.

(c) Section 128 - a contract may be awarded for a supply, service, or construction item without competition when it is determined in writing that there is only one source for the required supply, service, or construction item.

Condition: Of \$10,394,554 in non-payroll disbursements, we tested the following seventeen (17) non-federal program disbursements for which supporting documentation was inadequate to evidence the procurement process:

| <u>Item</u> | <u>Account</u> | <u>Check #</u> | <u>Date</u> | <u>Description</u>   | <u>Amount</u> |
|-------------|----------------|----------------|-------------|----------------------|---------------|
| 1           | BOG 177        | 78623          | 10/04/2019  | Auto and Truck       | \$192,534     |
| 2           | Operations     | 43272          | 10/04/2019  | Feasibility Project  | \$163,636     |
| 3           | Operations     | 43359          | 10/09/2019  | Kili Fuels and Oils  | \$245,650     |
| 4           | Operations     | 42977          | 08/07/2019  | Kili Fuels and Oils  | \$245,650     |
| 5           | Operations     | 44037          | 11/06/2019  | Solar Project        | \$134,097     |
| 6           | Operations     | 45109          | 11/06/2019  | Supplemental Food    | \$124,363     |
| 7           | Operations     | 45296          | 11/27/2019  | Supplemental Food    | \$248,725     |
| 8           | Operations     | 45381          | 12/13/2019  | Travel - Bikini      | \$100,000     |
| 9           | Operations     | 45579          | 02/03/2020  | Solar Project        | \$193,630     |
| 10          | Operations     | 45594          | 02/06/2020  | Supplemental Food    | \$124,363     |
| 11          | Operations     | 45953          | 04/13/2020  | Kili Fuels and Oils  | \$238,400     |
| 12          | Operations     | 46413          | 07/09/2020  | Solar Project        | \$193,630     |
| 13          | BPD            | 25784          | 11/22/2019  | Various Invoices     | \$32,639      |
| 14          | BPD            | 25901          | 12/02/2019  | Cat Good Earth       | \$2,427       |
| 15          | BPD            | 26382          | 02/21/2020  | Car Insurance        | \$965         |
| 16          | Operations     | 43295          | 10/04/2019  | Auto and Truck       | \$6,316       |
| 17          | Operations     | 46402          | 07/09/2020  | Kili Housing Project | \$16,611      |

## Kili/Bikini/Ejit Local Government

### Schedule of Findings and Responses, continued

Finding No.: 2020-001, continued  
Area: Local Noncompliance - RMI Procurement Code

Condition, continued:

Item #s 1, 15 and 16 pertain to vehicles acquired for the government executives.

Item # 2 pertains to the payment of the second invoice for the Kili Island Masterplan and Bikini Atoll Feasibility study.

Item #s 3, 4 and 11 pertain to fuel purchased during the year. Included in the disbursement is the fuel and oil for the 1<sup>st</sup> and 2<sup>nd</sup> quarters of FY2021.

Item #s 5, 9 and 12 pertain to the Solar Project for the Majuro Townhall and Ejit.

Item #s 6, 7 and 10 pertain to the Supplemental Food purchased for Majuro and Ejit.

Item # 17 pertains to contractor progress payments for the Kili Housing Projects.

Cause: Lack of adequate internal control policies and procedures requiring the documentation of procurement procedures to satisfy compliance with applicable procurement requirements.

Effect: Noncompliance with procurement requirements of the RMI Procurement Code.

Recommendation: We recommend that KBLGOV require that documentation be adequate to comply with the RMI Procurement Code. Specifically, documentation should indicate the history of procurement, including the rationale for contractor selection.

Auditee Response and Corrective Action Plan: We concur with the finding. KBLGOV is aware of the RMI Procurement Code and we will strictly implement this law.

# Kili/Bikini/Ejit Local Government

## Schedule of Findings and Responses, continued

Finding No.: 2020-002  
Area: Lack of Council Resolutions Approving Trust Fund Withdrawals

Criteria: Local government regulations and internal policies typically require that all trust fund withdrawals be authorized through a formal council resolution to ensure proper oversight and accountability.

Condition: During our review of trust fund transactions, we noted the following withdrawals made from the Resettlement Trust Fund and the Bikini Claims Trust Fund were not supported by formal approval through a Council resolution, as required by applicable policies and procedures:

### Resettlement Trust Fund:

| Withdrawal<br><u>Date</u> | Receipt<br><u>Date</u> | <u>Amount</u> | Withdrawal<br><u>Date</u> | Receipt<br><u>Date</u> | <u>Amount</u> |
|---------------------------|------------------------|---------------|---------------------------|------------------------|---------------|
| 10/02/2019                | 10/03/2019             | \$1,000,000   | 02/27/2020                | 02/28/2020             | \$1,323,760   |
| 10/03/2019                | 10/04/2019             | \$1,000,000   | 03/23/2020                | 03/24/2020             | \$1,079,730   |
| 10/24/2019                | 10/24/2019             | \$50,000      | 05/01/2020                | 05/01/2020             | \$1,230,835   |
| 11/04/2019                | 11/04/2019             | \$2,809,354   | 06/01/2020                | 06/03/2020             | \$885,653     |
| 12/31/2019                | 12/31/2019             | \$769,030     | 06/30/2020                | 06/30/2020             | \$922,826     |
| 01/07/2020                | 01/07/2020             | \$822,707     | 07/01/2020                | 07/01/2020             | \$76,247      |
| 01/30/2020                | 01/30/2020             | \$860,000     | 08/03/2020                | 08/03/2020             | \$1,121,064   |
| 01/31/2020                | 01/31/2020             | \$722,238     |                           |                        |               |

We have noted one transaction amounting to \$836,242 for which no corresponding Trust Fund Report was provided.

### Bikini Claims Trust Fund:

| Withdrawal<br><u>Date</u> | Receipt<br><u>Date</u> | <u>Amount</u> |
|---------------------------|------------------------|---------------|
| 06/30/2020                | 06/30/2020             | \$2,000,000   |

Cause: KBLGOV did not consistently follow established procedures requiring Council approval prior to initiating withdrawals from the respective trust funds.

## Kili/Bikini/Ejit Local Government

### Schedule of Findings and Responses, continued

Finding No.: 2020-002, continued  
Area: Lack of Council Resolutions Approving Trust Fund Withdrawals

Effect: Without proper Council authorization, there is an increased risk of unauthorized or inappropriate use of trust fund resources. This also undermines the transparency and accountability of financial operations related to the respective trust funds.

Recommendation: We recommend that KBLGOV implement controls to ensure that all future withdrawals from the respective trust funds are supported by approved Council resolutions. Management should also review past withdrawals to determine whether retroactive Council approval or corrective action is necessary.

Auditee Response and Corrective Action Plan: We concur with the finding. KBLGOV will make sure that all KBLGOV Trust Fund Withdrawals will be supported by approved Council Resolution.

# Kili/Bikini/Ejit Local Government

## Schedule of Findings and Responses, continued

Finding No.: 2020-003  
Area: Distribution Payments

Criteria: Disbursements from the Local Distribution Authority (LDA) should be supported by authorization letters or evidenced by signature from recipients.

Condition: During the year ended September 30, 2020, distribution payments of \$8,628,118 were made to the people of Bikini; however, underlying accounting records relative to distribution check disbursements were inadequate. Specifically, the following items were tested, all of which were not supported by evidence of receipt by authorized recipients:

### *November 2019 Special Distribution*

| <u>Date</u> | <u>Check #</u> | <u>Amount</u> | <u>Date</u> | <u>Check #</u> | <u>Amount</u> | <u>Date</u> | <u>Check #</u> | <u>Amount</u> |
|-------------|----------------|---------------|-------------|----------------|---------------|-------------|----------------|---------------|
| 11/12/19    | 79150          | \$1,780       | 11/12/19    | 79588          | \$1,335       | 11/12/19    | 727280         | \$2,670       |

### *July 2020 Special Distribution*

| <u>Date</u> | <u>Check #</u> | <u>Amount</u> | <u>Date</u> | <u>Check #</u> | <u>Amount</u> | <u>Date</u> | <u>Check #</u> | <u>Amount</u> |
|-------------|----------------|---------------|-------------|----------------|---------------|-------------|----------------|---------------|
| 07/02/20    | 85330          | \$890         | 07/02/20    | 85361          | \$94          | 07/02/20    | 85790          | \$1,194       |

### *Quarterly Distributions*

| <u>Date</u> | <u>Check #</u> | <u>Amount</u> | <u>Date</u> | <u>Check #</u> | <u>Amount</u> | <u>Date</u> | <u>Check #</u> | <u>Amount</u> |
|-------------|----------------|---------------|-------------|----------------|---------------|-------------|----------------|---------------|
| 11/27/19    | 80130          | \$372         | 05/08/20    | 83166          | \$125         | 08/26/20    | 86703          | \$496         |
| 11/27/19    | 80380          | \$124         | 05/09/20    | 83520          | \$500         | 08/26/20    | 86707          | \$124         |
| 11/27/19    | 80651          | \$744         | 05/11/20    | 84014          | \$625         | 08/26/20    | 86777          | \$124         |
| 02/26/20    | 81619          | \$1,764       | 05/11/20    | 84019          | \$2,375       | 08/26/20    | 87033          | \$248         |
| 02/26/20    | 81854          | \$378         | 05/11/20    | 84145          | \$250         | 08/26/20    | 87854          | \$124         |
| 02/26/20    | 82692          | \$126         | 05/11/20    | 84161          | \$375         |             |                |               |
| 02/26/20    | 82941          | \$630         | 05/12/20    | 84463          | \$125         |             |                |               |

### *Elderly Distributions*

| <u>Date</u> | <u>Check #</u> | <u>Amount</u> |
|-------------|----------------|---------------|
| 05/08/20    | 83045          | \$322         |

## Kili/Bikini/Ejit Local Government

### Schedule of Findings and Responses, continued

Finding No.: 2020-003, continued  
Area: Distribution Payments

Cause: Lack of adequate internal control policies and procedures over the maintenance of LDA distribution payment records.

Effect: Inability to determine whether the designated payees received distribution payments or whether the distribution payments were in accordance with prescribed policies and procedures.

Recommendation: We recommend management establish internal control policies and procedures requiring accounting records relative to distribution check disbursements be adequately maintained, safeguarded and filed.

Auditee Response and Corrective Action Plan: 90% of the Quarterly Distributions, Elderly and Special Distribution checks during FY2020 are all given to the banks – BOMI, MISCO or MIDB and other loan businesses.