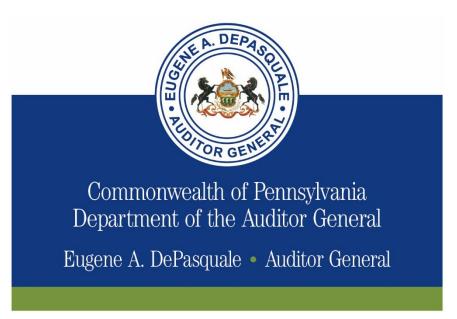
# **COMPLIANCE AUDIT**

# City of Reading Firemen's Pension Plan Berks County, Pennsylvania For the Period January 1, 2016 to December 31, 2017

March 2019







Commonwealth of Pennsylvania Department of the Auditor General Harrisburg, PA 17120-0018 Facebook: Pennsylvania Auditor General Twitter: @PAAuditorGen www.PaAuditor.gov

EUGENE A. DEPASQUALE AUDITOR GENERAL

The Honorable Mayor and City Council City of Reading Berks County Reading, PA 19601

We have conducted a compliance audit of the City of Reading Firemen's Pension Plan for the period January 1, 2016 to December 31, 2017. We also evaluated compliance with some requirements subsequent to that period when possible. The audit was conducted pursuant to authority derived from Section 402(j) of Act 205 and in accordance with the standards applicable to performance audits contained in *Government Auditing Standards* issued by the Comptroller General of the United States. Those standards require that we plan and perform our audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our finding and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our finding and conclusions based on our audit objectives.

The objectives of the audit were:

- 1. To determine if municipal officials took appropriate corrective action to address the finding contained in our prior audit report; and
- 2. To determine if the pension plan was administered in compliance with applicable state laws, regulations, contracts, administrative procedures, and local ordinances and policies.

Our audit was limited to the areas related to the objectives identified above. To determine if municipal officials took appropriate corrective action to address the finding contained in our prior audit report, we inquired of plan officials and evaluated supporting documentation provided by officials evidencing that the suggested corrective action has been appropriately taken. To determine whether the pension plan was administered in compliance with applicable state laws, regulations, contracts, administrative procedures, and local ordinances and policies, our methodology included the following:

We determined whether state aid was properly determined and deposited in accordance with Act 205 requirements by verifying the annual deposit date of state aid and determining whether deposits were made within 30 days of receipt for all years within the period under audit.

- We determined whether annual employer contributions were calculated and deposited in accordance with the plan's governing document and applicable laws and regulations by examining the municipality's calculation of the plan's annual financial requirements and minimum municipal obligation (MMO) and comparing these calculated amounts to amounts actually budgeted and deposited into the pension plan as evidenced by supporting documentation.
- We determined whether annual employee contributions were calculated, deducted, and deposited into the pension plan in accordance with the plan's governing document and applicable laws and regulations by testing total members' contributions on an annual basis using the rates obtained from the plan's governing document in effect for all years within the period under audit and examining documents evidencing the deposit of these employee contributions into the pension plan.
- We determined whether retirement benefits calculated for 4 of the 13 plan members<sup>1</sup> who retired during the current audit period, and through the completion of our fieldwork procedures, represent payments to all (and only) those entitled to receive them and were properly determined and disbursed in accordance with the plan's governing document, applicable laws and regulations by recalculating the amount of the monthly pension benefit due to retired individuals and comparing these amounts to supporting documentation evidencing amounts determined and actually paid to recipients. We also determined whether retirement benefits calculated for 5 of the 6 plan members<sup>2</sup> who elected to vest during the current audit period, and through the completion of our fieldwork procedures, represent payments to all (and only) those entitled to receive them and were properly determined in accordance with the plan's governing document, applicable laws and regulations by recalculating the amount of the pension benefit due to retired individuals to all (and only) those entitled to receive them and were properly determined in accordance with the plan's governing document, applicable laws and regulations by recalculating the amount of the pension benefit due to retired individuals and comparing these amounts to supporting document, applicable laws and regulations by recalculating the amount of the pension benefit due to retired individuals and comparing these amounts to supporting documentation evidencing amounts determined.
- We determined whether the January 1, 2015 and January 1, 2017 actuarial valuation reports were prepared and submitted by March 31, 2016 and 2018, respectively, in accordance with Act 205 and whether selected information provided on these reports is accurate, complete, and in accordance with plan provisions to ensure compliance for participation in the state aid program by comparing selected information to supporting source documentation.

<sup>&</sup>lt;sup>1</sup> We selected plan members randomly from the population of plan members who retired during the current audit period, and through the completion of our fieldwork procedures, in order to obtain a representative selection for the purpose of our testing to achieve the audit objective. While representative selection is a required factor of audit sampling methodologies, audit sampling methodology was not applied to achieve this test objective; accordingly, the results of this audit procedure are not, and should not be, projected to the population.

<sup>&</sup>lt;sup>2</sup> We selected plan members randomly from the population of plan members who elected to vest during the current audit period, and through the completion of our fieldwork procedures, in order to obtain a representative selection for the purpose of our testing to achieve the audit objective. While representative selection is a required factor of audit sampling methodologies, audit sampling methodology was not applied to achieve this test objective; accordingly, the results of this audit procedure are not, and should not be, projected to the population.

- We determined whether all annual special ad hoc postretirement reimbursements received by the municipality were authorized and appropriately deposited in accordance with Act 147 by tracing information to supporting documentation maintained by plan officials.
- We determined whether the pension plan is in compliance with Act 205 for distressed municipalities through inquiry of plan officials and evaluation of the recovery remedies implemented during the audit period and through the completion of our fieldwork procedures.
- We determined whether the terms and methodologies of the issuance of pension obligation bonds by the municipality, and any restrictions were in compliance with plan provisions and Act 205 through inquiry of plan officials and examination of supporting documentation.
- We determined whether provisions of the Deferred Retirement Option Plan (DROP) were in accordance with the provisions of Act 205 by examining provisions stated in the plan's governing documents.

The City of Reading contracted with an independent certified public accounting firm for annual audits of its basic financial statements which are available at the city's offices. Those financial statements were not audited by us and, accordingly, we express no opinion or other form of assurance on them.

City officials are responsible for establishing and maintaining effective internal controls to provide reasonable assurance that the City of Reading Firemen's Pension Plan is administered in compliance with applicable state laws, regulations, contracts, administrative procedures, and local ordinances and policies. In conducting our audit, we obtained an understanding of the city's internal controls as they relate to the city's compliance with those requirements and that we considered to be significant within the context of our audit objectives, and assessed whether those significant controls were properly designed and implemented. Additionally and as previously described, we tested transactions, assessed official actions, performed analytical procedures, and interviewed selected officials to provide reasonable assurance of detecting instances of noncompliance with legal and regulatory requirements or noncompliance with provisions of contracts, administrative procedures, and local ordinances and policies that are significant within the context of the audit objectives.

The results of our procedures indicated that, in all significant respects, the City of Reading Firemen's Pension Plan was administered in compliance with applicable state laws, regulations, contracts, administrative procedures, and local ordinances and policies, except as noted in the following finding further discussed later in this report:

Finding – Noncompliance With Prior Audit Recommendation – Incorrect Data On Certification Form AG 385 Resulting In A Net Underpayment Of State Aid The finding contained in this audit report repeats a condition that was cited in our previous audit report that has not been corrected by city officials. We are concerned by the city's failure to correct this previously reported audit finding and strongly encourage timely implementation of the recommendation noted in this audit report.

The accompanying supplementary information is presented for purposes of additional analysis. We did not audit the information or conclude on it and, accordingly, express no form of assurance on it. As noted in the Appendix included in this report, the City of Reading has been declared a distressed municipality pursuant to the provisions of Act 47. We encourage city officials to continue its efforts in the development of a long-term strategic plan to monitor the funding of the firemen's pension plan to ensure its long-term financial stability.

The contents of this report were discussed with officials of the City of Reading and, where appropriate, their responses have been included in the report. We would like to thank city officials for the cooperation extended to us during the conduct of the audit.

Eugnt: O-Pargue

EUGENE A. DEPASQUALE Auditor General

March 5, 2019

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#### BACKGROUND

On December 18, 1984, the Pennsylvania Legislature adopted the Municipal Pension Plan Funding Standard and Recovery Act (P.L. 1005, No. 205, as amended, 53 P.S. § 895.101 <u>et seq</u>.). The Act established mandatory actuarial reporting and funding requirements and a uniform basis for the distribution of state aid to Pennsylvania's public pension plans. Section 402(j) of Act 205 specifically requires the Auditor General, as deemed necessary, to make an audit of every municipality which receives general municipal pension system state aid and of every municipal pension plan and fund in which general municipal pension system state aid is deposited.

Annual state aid allocations are provided from a 2 percent foreign (out-of-state) casualty insurance premium tax, a portion of the foreign (out-of-state) fire insurance tax designated for paid firefighters and any investment income earned on the collection of these taxes. Generally, municipal pension plans established prior to December 18, 1984, are eligible for state aid. For municipal pension plans established after that date, the sponsoring municipality must fund the plan for three plan years before it becomes eligible for state aid. In accordance with Act 205, a municipality's annual state aid allocation cannot exceed its actual pension costs.

In addition to Act 205, the City of Reading Firemen's Pension Plan is also governed by implementing regulations adopted by the former Public Employee Retirement Commission published at Title 16, Part IV of the Pennsylvania Code and applicable provisions of various other state statutes including, but not limited to, the following:

- Act 67 The Third Class City Code, Act of November 24, 2015 (P.L. 242, No. 67), as amended, 11 Pa. C.S. § 10101 et seq.
- Act 147 Special Ad Hoc Municipal Police and Firefighter Postretirement Adjustment Act, Act of December 14, 1988 (P.L. 1192, No. 147), as amended, 53 P.S. § 896.101 et seq.

The City of Reading Firemen's Pension Plan is a single-employer defined benefit pension plan locally controlled by the provisions of Ordinance No. 23-2013, adopted pursuant to Act 67 (formerly Act 317). The plan is also affected by the provisions of collective bargaining agreements between the city and its firefighters. The plan was established January 31, 1972. Active members are required to contribute 5 percent of compensation, plus \$5 per month to the plan. As of December 31, 2017, the plan had 111 active members, 12 terminated members eligible for vested benefits in the future, and 149 retirees receiving pension benefits from the plan.

### **BACKGROUND – (Continued)**

As of December 31, 2017, selected plan benefit provisions are as follows:

#### Eligibility Requirements:

Normal Retirement	Age 50 and 20 years of service
Early Retirement	None
Vesting	100% after 12 years of service

### Retirement Benefit:

Benefit equals 50% of average monthly compensation (greater of last 12 months of highest 5 years), plus a service increment of 1/40th of such pension for each completed year of service in excess of 20, excluding service after age 65, up to a maximum increment of \$500. Compensation for participants hired before 1/1/2011 is total wages; for participants hired after 12/31/2010, total wages excludes overtime.

#### Survivor Benefit:

Killed-In-Service or After Retirement Eligibility: Normal Retirement Benefit is payable to the spouse for life. Upon the spouse's death, the participant's children will share the benefit until age 18.

#### Disability Benefit:

Service Related	Normal Retirement Benefit calculated at date of disablement.
Non-Service Related	After 5 years: 2.5% of average annual compensation for each year of service (maximum of 50%).

## CITY OF READING FIREMEN'S PENSION PLAN STATUS OF PRIOR FINDING

## Noncompliance With Prior Audit Recommendation

The City of Reading has not complied with the prior audit recommendation concerning the following as further discussed in the Finding and Recommendation section of this report:

· Incorrect Data On Certification Form AG 385 Resulting In A Net Overpayment Of State Aid

## CITY OF READING FIREMEN'S PENSION PLAN FINDING AND RECOMMENDATION

## <u>Finding – Noncompliance With Prior Audit Recommendation – Incorrect Data On</u> <u>Certification Form AG 385 Resulting In A Net Underpayment Of State Aid</u>

<u>Condition</u>: As disclosed in the prior audit report, the city failed to certify 1 eligible firefighter (2 units) and understated payroll by \$48,872 on the Certification Form AG 385 filed in 2014. In addition, the city certified 1 ineligible police officer (2 units) and overstated payroll by \$90,005, and failed to certify 1 eligible firefighter (2 units) and understated payroll by \$37,812 on the Certification Form AG 385 filed in 2015. Furthermore, the city certified 1 ineligible police officer (2 units) and overstated payroll by \$97,278 on the Certification Form AG 385 filed in 2016. These errors resulted in a net overpayment of state aid in the amount of \$1,004 for the years 2014 through 2016, which was recommended to be returned to the Commonwealth; however, that amount was not returned.

During the current audit period, the city failed to certify 1 eligible police officer (2 units) and understated payroll by \$51,626, and failed to certify 1 eligible non-uniformed employee (1 unit) and understated payroll by \$93,681 on the Certification Form AG 385 filed in 2017. The data contained on these certification forms is based on prior calendar year information.

<u>Criteria</u>: Pursuant to Act 205, at Section 402(e)(2), an employee who has been employed on a full-time basis for at least six consecutive months and has been participating in a pension plan during the certification year is eligible for certification.

<u>Cause</u>: Due to a change in personnel, plan officials failed to establish adequate internal control procedures to ensure the accuracy of the data certified and to ensure compliance with the prior audit recommendation.

<u>Effect</u>: The data submitted on these certification forms is used, in part, to calculate the state aid due to the municipality for distribution to its pension plans. Since the city failed to return the net overpayment of state aid for the years 2014 through 2016 to the Commonwealth, the effect of those years' error will be netted with the errors in 2017. Because the city's state aid allocations were based on unit value, the city received a net underpayment of state aid for the years 2014 through 2017 in the amount of \$12,760 as identified below:

### CITY OF READING FIREMEN'S PENSION PLAN FINDING AND RECOMMENDATION

#### <u>Finding – (Continued)</u>

Year	Type of Plan	Units Overstated (Understated)	Unit Value	Ove	tate Aid erpayment erpayment)
2014	Firemen's	(2)	\$3,873	\$	(7,746)
2015	Police Firemen's	2 (2)	\$3,921	\$	7,842 (7,842)
2016	Police	2	\$4,375	\$	8,750
2017	Police Officers and Employees	(2) (1)	\$4,588	\$	(9,176) (4,588)
	Ne	t Underpayment of	State Aid	\$	(12,760)

Although the net underpayment for the years 2014 through 2017 will be allocated to the city, the full amount of the 2017 state aid allocation was not available to be deposited timely and therefore was not available to pay operating expenses or for investment.

<u>Recommendation</u>: We again recommend that in the future, plan officials establish adequate internal control procedures, such as having at least two people review the data certified, to ensure compliance with the instructions that accompany Certification Form AG 385 to assist them in accurately reporting the required pension data.

Management's Response: Municipal officials agreed with the finding without exception.

Auditor's Conclusion: Compliance will be evaluated during our next audit of the plan.

The supplementary information contained on Pages 6 through 9 reflects the implementation of GASB Statement No. 67, *Financial Reporting for Pension Plans*. The objective of this statement is to improve financial reporting by state and local governmental pension plans.

## SCHEDULE OF CHANGES IN THE NET PENSION LIABILITY AND RELATED RATIOS FOR THE YEARS ENDED DECEMBER 31, 2014 AND 2015

		<u>2014</u>		<u>2015</u>
Total Pension Liability	¢	1 (0( 70)	¢	1 404 000
Service cost	\$	1,606,792	\$	1,494,096
Interest Difference between expected and extral experience		5,377,405		5,346,065
Difference between expected and actual experience		-		(3,239,956)
Benefit payments, including refunds of member contributions		(2,610,654)		(4.504.225)
		<u>(3,610,654)</u> 3,373,543		(4,504,335)
Net Change in Total Pension Liability				(904,130)
Total Pension Liability – Beginning	<u>_</u>	71,864,633	<u>_</u>	75,238,176
Total Pension Liability – Ending (a)	\$	75,238,176	\$	74,334,046
Plan Fiduciary Net Position				
Contributions – employer	\$	2,282,336	\$	2,957,060
Contribution – member		456,196		463,696
Net investment income		2,495,024		(116,829)
Benefit payments, including refunds of member				
contributions		(3,610,654)		(4,504,335)
Administrative expense		(85,450)		(129,985)
Other		6,732		-
Net Change in Plan Fiduciary Net Position		1,544,184		(1,330,393)
Plan Fiduciary Net Position – Beginning		52,831,654		54,375,838
Plan Fiduciary Net Position – Ending (b)	\$	54,375,838	\$	53,045,445
Net Pension Liability – Ending (a-b)	\$	20,862,338	\$	21,288,601
Plan Fiduciary Net Position as a Percentage of the Total				
Pension Liability		72.27%		71.36%
Estimated Covered Employee Payroll	\$	7,197,001	\$	8,126,767
Net Pension Liability as a Percentage of Covered Employee Payroll		289.88%		261.96%

## SCHEDULE OF CHANGES IN THE NET PENSION LIABILITY AND RELATED RATIOS FOR THE YEARS ENDED DECEMBER 31, 2016 AND 2017

	<u>2016</u>	<u>2017</u>
Total Pension Liability		
Service cost	\$ 1,545,376	\$ 1,537,256
Interest	5,534,661	5,784,370
Difference between expected and actual experience	-	(628,536)
Changes of assumptions	-	3,807,415
Benefit payments, including refunds of member		
contributions	 (4,244,639)	 (4,277,152)
Net Change in Total Pension Liability	2,835,398	6,223,353
Total Pension Liability – Beginning	 74,334,046	 77,169,444
Total Pension Liability – Ending (a)	\$ 77,169,444	\$ 83,392,797
Plan Fiduciary Net Position		
Contributions – employer	\$ 2,811,430	\$ 3,025,070
Contributions – member	466,719	480,346
Net investment income	3,427,585	7,856,603
Benefit payments, including refunds of member		
contributions	(4,244,639)	(4,277,152)
Administrative expense	(114,338)	(112,983)
Net Change in Plan Fiduciary Net Position	2,346,757	6,971,884
Plan Fiduciary Net Position – Beginning	 53,045,445	 55,392,202
Plan Fiduciary Net Position – Ending (b)	\$ 55,392,202	\$ 62,364,086
Net Pension Liability – Ending (a-b)	\$ 21,777,242	\$ 21,028,711
Plan Fiduciary Net Position as a Percentage of the Total		
Pension Liability	71.78%	74.78%
Estimated Covered Employee Payroll	\$ 7,959,803	\$ 8,265,535
Net Pension Liability as a Percentage of Covered		
Employee Payroll	273.59%	254.41%
-		

#### Sensitivity of the Net Pension Liability to Changes in the Discount Rate

The following presents the net pension liability of the city as of December 31, 2015 and 2016, calculated using the discount rate of 7.50%, as well as what the city's net pension liability would be if it were calculated using a discount rate that is 1 percentage-point lower or 1 percentage-point higher than the current rate:

	Current			
	1% Decrease (6.50%)	D1	iscount Rate (7.50%)	1% Increase (8.50%)
Net Pension Liability – 12/31/15	\$ 29,651,042	\$	21,288,601	\$ 14,271,520
Net Pension Liability – 12/31/16	\$ 30,355,411	\$	21,777,242	\$ 14,578,242

In addition, the following presents the net pension liability of the city as of December 31, 2017, calculated using the discount rate of 7.25%, as well as what the city's net pension liability would be if it were calculated using a discount rate that is 1 percentage-point lower or 1 percentage-point higher than the current rate:

	Current		
	1% Decrease (6.25%)	Discount Rate (7.25%)	1% Increase (8.25%)
Net Pension Liability – 12/31/17	\$ 30,726,783	\$ 21,028,711	\$ 12,956,083

# SCHEDULE OF CONTRIBUTIONS

Year Ended December 31	Actuarially Determined Contribution	Actual Contributions	Contribution Deficiency (Excess)	Covered- Employee Payroll	Contributions as a Percentage of Covered- Employee Payroll
2008	\$ 1,289,485	\$ 1,300,247	\$ (10,762)	\$ 7,880,584	16.50%
2009	1,346,126	1,346,495	(369)	8,165,493	16.49%
2010	1,380,603	1,587,874	(207,271)	8,392,528	18.92%
2011	1,976,423	1,984,463	(8,040)	8,506,650	23.33%
2012	1,903,883	1,903,873	10	8,031,312	23.71%
2013	2,286,857	2,286,857	-	7,216,688	31.69%
2014	2,282,337	2,282,336	1	7,197,001	31.71%
2015	2,956,620	2,957,060	(440)	8,126,767	36.39%
2016	2,811,430	2,811,430	-	7,959,803	35.32%
2017	2,891,616	3,025,070	(133,454)	8,265,535	36.60%

## SCHEDULE OF INVESTMENT RETURNS

Annual Money-Weighted Rate of Return, Net of Investment Expense:

2017	15.46%
2016	7.12%
2015	(0.28)%
2014	5.49%

#### SCHEDULE OF FUNDING PROGRESS

Historical trend information about the plan is presented herewith as supplementary information. It is intended to help users assess the plan's funding status on a going-concern basis, assess progress made in accumulating assets to pay benefits when due, and make comparisons with other state and local government retirement systems.

The actuarial information is required by Act 205 biennially. The historical information, beginning as of January 1, 2013, is as follows:

	(1)	(2)	(3)	(4)
			Unfunded	
		Actuarial	(Assets in	
		Accrued	Excess of)	
	Actuarial	Liability	Actuarial	
Actuarial	Value of	(AAL) -	Accrued	Funded
Valuation	Assets	Entry Age	Liability	Ratio
Date	(a)	(b)	(b) - (a)	(a)/(b)
01-01-13	\$ 56,065,996	\$ 68,631,442	\$ 12,565,446	81.7%
01-01-15	60,995,673	71,998,220	11,002,547	84.7%
01-01-17	66,028,988	80,348,323	14,319,335	82.2%

Note: The market values of the plan's assets at 01-01-13, 01-01-15, and 01-01-17 have been adjusted to reflect the smoothing of gains and/or losses which will be limited to a maximum of 120 percent and a minimum of 80 percent of the fair market value of assets. This method will lower contributions in years of less than expected returns and increase contributions in years of greater than expected returns. The net effect over long periods of time is to have less variance in contribution levels from year to year.

The comparability of trend information is affected by changes in actuarial assumptions, benefit provisions, actuarial funding methods, accounting policies, and other changes. Those changes usually affect trends in contribution requirements and in ratios that use the actuarial accrued liability as a factor.

Analysis of the dollar amount of the actuarial value of assets, actuarial accrued liability, and unfunded (assets in excess of) actuarial accrued liability in isolation can be misleading. Expressing the actuarial value of assets as a percentage of the actuarial accrued liability (Column 4) provides one indication of the plan's funding status on a going-concern basis. Analysis of this percentage, over time, indicates whether the system is becoming financially stronger or weaker. Generally, the greater this percentage, the stronger the plan.

## CITY OF READING FIREMEN'S PENSION PLAN SUPPLEMENTARY INFORMATION NOTES TO SUPPLEMENTARY SCHEDULES (UNAUDITED)

The information presented in the supplementary schedules was determined as part of the actuarial valuation at the date indicated. Additional information as of the latest actuarial valuation date follows:

Actuarial valuation date	January 1, 2017
Actuarial cost method	Entry age normal
Amortization method	Level dollar
Remaining amortization period	8 years
Asset valuation method	The actuarial value of assets will be limited to a maximum of 120% and a minimum of 80% of the fair market value of assets.
Actuarial assumptions:	
Investment rate of return	7.25%
Projected salary increases	5.25%
Cost-of-living adjustments	None assumed

#### CITY OF READING FIREMEN'S PENSION PLAN APPENDIX

It was noted in the prior audit report that during 2009, the Department of Community and Economic Development (DCED) received a request for Determination of Municipal Financial Distress under the Municipalities Financial Recovery Act (Act of 1987 P.L. 246, No. 47) from the Mayor of the City of Reading. This Act empowers DCED to declare certain municipalities as financially distressed; provides for the restructuring of debt of financially distressed municipalities; limits the ability of financially distressed municipalities to obtain government funding; authorizes municipalities to participate in Federal debt adjustment actions under certain circumstances; and provides for consolidation or merger of contiguous municipalities to relieve financial distress.

DCED issued a report in 2009 which contained a recommendation that the City of Reading be declared distressed under Act 47. The report also indicated that the City had been experiencing ongoing financial challenges over the past several years, and given Reading's fiscal position there were serious questions and uncertainty as to the City's ability to maintain municipal services without an adverse impact on the health, safety, and welfare of residents of the City.

The City stated the following in the Management's Discussion and Analysis portion of the City of Reading Financial and Compliance Audit Report for the year ended December 31, 2017:

The City maintained its status within Act 47 for the fiscal year ending December 31, 2017. In partnership with the City's Act 47 coordinator, Public Financial Management (PFM), the City continued to take positive steps to reduce spending and improve revenues. However, the City still faces significant financial challenges which will force difficult choices to overcome long-term structural deficits.

Among the most pressing areas of concern are: 1) expected yearly increases in the City's Minimum Municipal Obligation, which totaled approximately \$15.7 million in 2017, 2) year-over-year increases in the cost of Public Safety operations, which totaled \$56.1 million in 2017, and 3) legal expenses related to ongoing litigation.

### CITY OF READING FIREMEN'S PENSION PLAN REPORT DISTRIBUTION LIST

This report was initially distributed to the following:

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