

The Corporation of the City of Windsor

Property tax billing and payment processing

*FINAL Internal
Audit Report*

*Prepared as of
September 11, 2018*

Distribution List

For action

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For information

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Internal audit context

Background information

Property Tax Billing and Payment Processing Internal Audit is part of the Council approved 2017/18 Internal Audit Plan. Internal Audit reviewed the City's Property Tax Billing and Payment Processing function.

The Taxation and Financial Projects department is lead by the Deputy Treasurer who reports directly to the City Treasurer. There are three Managers who are responsible for property assessment, property taxation & taxpayer support, and treasury & cash management. These individuals report directly to the Deputy Treasurer.

The property tax billing and payment processing function falls under the domain of Property Taxation and Tax Payer Support Division which is lead by a Manager. There are seven staff members including Senior Tax Analyst, Property Tax Analyst, Tax Account Administrators, Property Tax Clerks, and Customer Service Clerk, all of whom report directly to the Manager Property Taxation and Tax Payer Support.

The City uses a "AMANDA Tax Module" for tax billing and tax payment processing. In performing this internal audit, we applied data analytics to examine the population of data from the AMANDA Tax Module for the period in scope. The data analytics testing included testing of: customer master data, property master data, tax calculation, tax billing, tax payment, and adjustments.

The City of Windsor has recently introduced e-service for property owners known as "My Property Tax" which may be accessed by registering on the City of Windsor website. For account registration and authentication, a customer is required to enter necessary details including: name, mailing address, date & amount of last payment and answer to other relevant questions. This information is further received and validated by the relevant staff member at City and is further matched with the information within Amanda. If the information received is correct, a PIN number is sent to the customer through which accessing of account becomes possible. My Property Tax service allows property owners to view details about their tax bills, upcoming due dates, balances, make updates to their account information, and also provides the facility to request tax statements.

Scope

The scope of this internal audit included an assessment of the controls in effect for the period January 1, 2017 through to December 31, 2017.

Internal audit objectives

In conducting this internal audit, we used Data Analytics procedures to examine the population of data from the AMANDA Tax Module system. This included analytics relevant to examining workflow controls and recalculations. Data analytics results have been used to assist the testing and to provide information regarding various trends within the period under review to achieve the following objectives:

#	Process Under Review	Internal Audit Objectives
1	Maintaining master data	Master data (customer and property tax calculation inputs) is maintained and changes to master data are processed completely and accurately.
2	Processing property tax bills	Tax bills are accurately and completely processed and billing errors

		(if any) are identified and corrected on a timely basis.
3	Processing tax payments	Tax Payment controls are efficient in determining the taxes balances by property.
4	Tax payment corrections/adjustment	Tax adjustments or corrections to balances are identified, monitored and resolved on a timely basis.

Specific scope exclusions

Given the nature of the work, risk considerations and budgeted effort, the following elements were excluded from the scope of the internal audit:

- The design, implementation and operation of the Information and Technology (IT) environment and IT general controls, end user computing controls, IT application controls, data integrity of reports used in IT dependent manual controls;
- Setting of tax rate and reliance on third party i.e. MPAC for property valuations;
- Change management and segregation of duties related to system configuration;
- Accuracy and completeness of data provided by entities outside of the City;
- Billing and collection related to late payment/other penalties;
- Valuation of property tax provision and property tax appeals;
- Property tax collection services; and
- GL reconciliations.

Summary of Internal Audit results

Report classification

We used Data Analytics procedures to examine the population of data from the AMANDA Tax Module system. This included analytics relevant to examining workflow controls and recalculations. Data analytics results have been used to assist the testing and to provide information regarding various trends within the period under review.

In the course of performing data analytics procedures, we validated select manual/management review controls related to the approval of adjustments and transfers. These were relevant controls identified by management when assisting Internal Audit with disposing of potential/preliminary data findings/exceptions related to suspense accounts. The testing of the manual controls was limited to a design evaluation only.

Our understanding and observations from the four review areas is summarized below:

Maintaining master data

Property assessment data including roll number and assessed value for tax calculation is loaded into AMANDA Tax Module which is received from an independent source Municipal Property Assessment Corporation (MPAC). The system performs validation checks to ensure data loaded is accurate and management reviews for exceptions if any. We applied data analytics on data from the AMANDA Tax Module for the period in scope to assess the data quality. The data tests results illustrated that people ID (RSN #) and property ID were valid and active listed properties had an address associated and the listed account IDs (folder RSN numbers) were valid.

Final tax billing rates and billing information is prepared by Manager - Taxation and presented to Council for approval via council reports. Approved tax rates are manually input into the system based on the property type/class which applies to all the properties listed under the property type.

Processing property tax bills

Tax is calculated based on MPAC assessment which is input in the AMANDA system. Tax calculations are first run in a test environment by property type and the results are reconciled with other reports. The non-reconciling items are identified and rectified prior to bills processing. The year-end for tax billing is the month of January in which interim bills are issued whereas the final bills are issued in June respectively.

Tax bills (interim and final) are generated on timely basis against all active properties by using the billing schedule and billing checklists for bills including interim, final and ad-hoc. In 39 instances tax bills were mailed to international addresses that the property owners had provided for receiving tax bills. Management may wish to consider using digital means for issuing tax bills to international addresses.

Management has devised billing checklists which entails documented steps/instructions for staff to perform the control activities with respect to interim & final billing, ad-hoc billing and year end activities. Based on discussion with process participants, we understand that these steps are performed as required in policies and procedures to perform monitoring of suspense accounts and investigation of suspense account balances, review of credit balances, performing data checks, and periodic assessment of user access rights, however, such steps are not documented in the existing checklists. The existing checklists can be enhanced by adding sections as “preparer sign-off and date” and “reviewer sign-off and date” for each respective task. This will demonstrate segregation of duties and support timely completion of each task with documented review evidence.

Processing tax payments

To process manual/in person payments, Tax Account Administrators scan the encrypted payment stubs which has amount and roll numbers documented. The amount and roll number is recognized by the system and the system updates the payment record. To process the payment received via online banking, a deposit log is received daily from the bank and the Tax Operation Control Clerk notes these payments and applies into the taxpayer’s account in AMANDA to match the deposit log. The file from the bank is imported into an AMANDA payment batch. Any error due to matching of account is identified and corrected prior to the batch being submitted for Manager approval. Manager confirms no errors are present and that control lines i.e. count of payment and total dollar value is reconciled.

The City does not accept cash payments; however, a number of payment options were noted as used by taxpayers as per the data tests including manual payments, payments via cheques, online banking, and pre-authorized payment facility. Credit balances are monitored by generating a credit report on a monthly basis. High dollar value credits are investigated and refunds are issued if required.

Tax payment corrections/adjustment

Management has devised procedures for handling unidentified account payments. The payments flagged as unapplied due to incorrect roll number data entry by the taxpayer are transferred to a suspense account. The Tax Accounting Clerk investigates the payments and reviews the appropriate course of action after discussing with the Manager Property Taxation. The Suspense account balance is investigated on an ad-hoc basis and adjustments are made accordingly. Protocols for monitoring long term trends of suspense account balances have not been established.

Tax Adjustments are performed by filling out an adjustment form which is duly completed by requestor and approved by staff responsible for recording adjustments. The level of approvals are documented.

Through discussion with management, there are ongoing plans to update checklists which should help in continuous and adequate monitoring.

Based on our applied Data Analytics procedures and subsequent Data analytics results to assist the testing and to provide information regarding various trends within the period under review, we have determined that there is reasonable evidence to indicate that:

	No or limited scope improvement	No major concerns noted	Cause for concern	Cause for considerable concern
For the objectives related to 1. Maintaining Master Data				
Controls over the process are designed in such a manner that there are:				
Sample tests indicated that process controls were operating such that there are:				
	No or limited scope improvement	No major concerns noted	Cause for concern	Cause for considerable concern
For the objectives related to 2. Processing Property Tax Bills				

Controls over the process are designed in such a manner that there are:				
Sample tests indicated that process controls were operating such that there are:				
For the objectives related to 3. Processing Tax Payments				
Controls over the process are designed in such a manner that there are:				
Sample tests indicated that process controls were operating such that there are:				
For the objectives related to 4. Tax Payment Corrections/Adjustment				
Controls over the process are designed in such a manner that there are:				
Sample tests indicated that process controls were operating such that there are:				

Management has provided comprehensive action plans, which we believe will address the deficiencies noted.

Summary of positive themes

Based on the data testing and fieldwork conducted by Internal Audit, the following positive themes were noted:

Maintaining master data

- While applying data analytics procedures on data extracted from the AMANDA Tax Module, other than minor anomalies, we noted no discrepancies. Please refer to Appendix “C1 - Property Analysis” for data visuals.

Processing property tax bills

- Interim and final bills (types of bills that have strict issuing date) were issued in January and June respectively.
- Tax rates were entered accurately and were valid for the property types.
- Bills were issued to the active properties on the correct number of occasions required i.e. Interim Bill in January and Final Bill in June respectively.
- Omitted (additional) and supplementary (previous) assessment, which is received from MPAC, is uploaded in AMANDA Tax Module and then billed accordingly. These updates may be received up to seven times through the year.
- Management has devised billing checklists which documents steps to consider for interim, final, supplementary and omit billing, as well as year-end activities.

Processing tax payments

- Property owners have multiple payment options including online banking, cheques and pre-authorized payments. The City does not accept payment in cash.
- Property owners have the option to access their account online to view details about their tax bills, upcoming due dates, balances, make updates to their account information, and also provides the facility to request tax statements by using “My Property Tax” e-service developed by the City.

Tax payment corrections/adjustment

- Procedures for unidentified account payment processing exists and the approval levels are defined. Investigation of unidentified payments that are transferred into suspense account is performed on ad-hoc basis and balances are reconciled accordingly. Please refer Appendix C2 and C3 for Adjustments analysis and Suspense account analysis for data visuals.

Summary of findings

Finding #	Topic	Rating ¹			Management Action Plan
		Significant	Moderate	Low	
Maintaining master data					
	None	-	-	-	
Processing property tax bills					
1.	Improve evidence of timely review of key billing controls	-	-	X	Documentation process will be enhanced by adding reviewer and approval sign-off. Processes will be defined in regards to the review of suspense accounts, credit balances and other ad hoc data checks.
Processing tax payments					
	None	-	-	-	
Tax payment corrections/adjustment					
	None	-	-	-	
Total		0	0	1	

Summary of significant findings

No significant findings were noted within or during the scope of Internal Audit's work.

Management comments

Management is pleased that the controls identified and tested as part of the Internal Audit of the City's Property Tax Billing and Payment Processing by PwC has concluded that there are "no major concerns noted" or "no or limited scope improvement opportunities" for the various controls tested. Property taxation is the primary funding source for annual operating and capital expenditures and financially impacts residents and business owners of the City of Windsor. These findings affirm management's ongoing commitment and understanding to ensuring that appropriate internal controls, policies, and procedures are in place relative to this significant service. The report also references a number of positive themes that have been identified as part of this review covering key areas including the maintenance of master data, processing of property tax bills, processing of property tax payments and payment corrections/ adjustments, all which contribute to the strong internal control environment relative to property taxes. The review does identify some opportunities for further improvement and offers recommendations for further enhancements to the existing controls. Management has considered each of the noted findings and recommendations individually and provided Management Action Plans to address the findings noted.

Name: Joe Mancina
 Title: CFO/City Treasurer, Corporate Leader Finance & Technology
 Date: September 11, 2018

¹ See Appendix A for Basis of Finding Rating and Report Classification

Detailed observations

1. Improve evidence of timely completion and review of key billing controls - (Design Effectiveness)		Overall Rating: Low	
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Impact:	Low	Likelihood:	Likely
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Observation: Management has devised process checklists for key property tax billing activities which specify tasks applicable to several billing cycles (year-end, interim, final, supplement, omit.)

The existing checklist is a list of activities/tasks to be completed and this is not used by management as a central control document to demonstrate completion or sign-off by preparer and reviewer which would support adequate segregation of duties, timely completion and review of activities/tasks.

Key items that were excluded from the current billing checklist were the monitoring of suspense accounts, investigation of suspense account balances, review of credit balances, performing data checks, and periodic assessment of user access rights are not documented in the existing checklists. Though we understand based on discussion with process participants that these steps are performed as required in policies and procedures.

Implication:

There may not be a mechanism to validate segregation of duties as well as timeliness of completion and review of control activities.

Possible root cause:

There does not appear to be formal documentation of a process or protocol developed by the management for signing off and reviewing of tasks completed within the existing checklists.

Recommendation:

Management should enhance the existing checklists as per the table below:

Type of checklist	Tasks/activities to be added
Final Billing Checklist	<ul style="list-style-type: none"> sign-off by preparer and reviewer with date of completion and date of review respectively.
Interim & Year End Checklist	<ul style="list-style-type: none"> monitoring of suspense accounts and investigation of suspense account balances review of credit balances performing periodic data checks assessing user access rights periodically sign-off by preparer and reviewer with date of completion and date of review respectively.
Omit & Supplementary Billing Checklist	<ul style="list-style-type: none"> sign-off by preparer and reviewer with date of completion and date of review respectively.

Checklists should be available to staff who are assigned to perform their respective tasks. Such checklists should be retained to demonstrate completion of control activities.

Further, the checklists should be reviewed annually with relevant staff or when there is a change in process or system.

Management Action Plan

Action Plan: Management agrees with the internal audit finding and will enhance the documentation process by adding reviewer and approval sign-off as well as ensuring that there are defined processes developed with regards to the review of suspense accounts, credit balances and other ad hoc data checks.	Responsible Party:	Deputy Treasurer, Taxation and Financial Projects
	Due Date:	Q3 2019

Considerations for improvement

1. Paperless Billing

Observation

There were 39 instances where customers provided international postal addresses for receiving tax bills. Management informed Internal Audit that bills to such property owners are mailed to the international address.

Recommendation

Management should evaluate the cost and viability of issuing these international tax bills using digital means. This may result in reduced mailing costs and more timely receipt of the tax bills. It has come to our attention that the City has an initiative underway to switch to Paperless Billing which may address this recommendation..

Appendix A: Basis of findings rating and report classification

Findings rating matrix

Audit Findings Rating		Impact		
		Low	Medium	High
Likelihood	Highly Likely	Moderate	Significant	Significant
	Likely	Low	Moderate	Significant
	Unlikely	Low	Low	Moderate

Likelihood consideration

Rating	Description
Highly Likely	<ul style="list-style-type: none"> History of regular occurrence of the event. The event is expected to occur in most circumstances.
Likely	<ul style="list-style-type: none"> History of occasional occurrence of the event. The event could occur at some time.
Unlikely	<ul style="list-style-type: none"> History of no or seldom occurrence of the event. The event may occur only in exceptional circumstances.

Impact consideration

Rating	Basis	Description
HIGH	Dollar Value ²	Financial impact likely to exceed \$250,000 in terms of direct loss or opportunity cost.
	Judgemental Assessment	<p style="text-align: center;">Internal Control</p> <p>Significant control weaknesses, which would lead to financial or fraud loss.</p> <p>An issue that requires a significant amount of senior management/Board effort to manage such as:</p> <ul style="list-style-type: none"> · Failure to meet key strategic objectives/major impact on strategy and objectives. <ul style="list-style-type: none"> · Loss of ability to sustain ongoing operations: <ul style="list-style-type: none"> - Loss of key competitive advantage / opportunity - Loss of supply of key process inputs · A major reputational sensitivity e.g., Market share, earnings per share, credibility with stakeholders and brand name/reputation building. <p style="text-align: center;">Legal / Regulatory</p> <p>Large scale action, major breach of legislation with very significant financial or reputational consequences.</p>
MEDIUM	Dollar Value	Financial impact likely to be between \$75,000 to \$250,000 in terms of direct loss or opportunity cost.
	Judgemental Assessment	<p style="text-align: center;">Internal Control</p> <p>Control weaknesses, which could result in potential loss resulting from inefficiencies, wastage, and cumbersome workflow procedures.</p> <p>An issue that requires some amount of senior management/Board effort to manage such as:</p> <ul style="list-style-type: none"> · No material or moderate impact on strategy and objectives. · Disruption to normal operation with a limited effect on achievement of corporate strategy and objectives <ul style="list-style-type: none"> · Moderate reputational sensitivity. <p style="text-align: center;">Legal / Regulatory</p> <p>Regulatory breach with material financial consequences including fines.</p>
LOW	Dollar Value	Financial impact likely to be less than \$75,000 in terms of direct loss or opportunity cost.
	Judgemental Assessment	<p style="text-align: center;">Internal Control</p> <p>Control weaknesses, which could result in potential insignificant loss resulting from workflow and operational inefficiencies.</p> <p>An issue that requires no or minimal amount of senior management/Board effort to manage such as:</p> <ul style="list-style-type: none"> · Minimal impact on strategy · Disruption to normal operations with no effect on achievement of corporate strategy and objectives <ul style="list-style-type: none"> · Minimal reputational sensitivity. <p style="text-align: center;">Legal / Regulatory</p> <p>Regulatory breach with minimal consequences.</p>

² Dollar value amounts are agreed with the client prior to execution of fieldwork.

Audit report classification

Report Classification	The internal audit identified one or more of the following:
Cause for considerable concern	<ul style="list-style-type: none"> • Significant control design improvements identified to ensure that risk of material loss is minimized and functional objectives are met. • An unacceptable number of controls (including a selection of both significant and minor) identified as not operating for which sufficient mitigating back-up controls could not be identified. • Material losses have occurred as a result of control environment deficiencies. • Instances of fraud or significant contravention of corporate policy detected. • No action taken on previous significant audit findings to resolve the item on a timely basis.
Cause for concern	<ul style="list-style-type: none"> • Control design improvements identified to ensure that risk of material loss is minimized and functional objectives are met. • A number of significant controls identified as not operating for which sufficient mitigating backup controls could not be identified. • Losses have occurred as a result of control environment deficiencies. • Little action taken on previous significant audit findings to resolve the item on a timely basis.
No major concerns noted	<ul style="list-style-type: none"> • Control design improvements identified, however, the risk of loss is immaterial. • Isolated or “one-off” significant controls identified as not operating for which sufficient mitigating back-up controls could not be identified. • Numerous instances of minor controls not operating for which sufficient mitigating back-up controls could not be identified. • Some previous significant audit action items have not been resolved on a timely basis.
No or limited scope for improvement	<ul style="list-style-type: none"> • No control design improvements identified. • Only minor instances of controls identified as not operating which have mitigating back-up controls, or the risk of loss is immaterial. • All previous significant audit action items have been closed.

Appendix B: Limitations and responsibilities

Limitations inherent to the Internal Auditor's work

Internal control

Internal control systems, no matter how well designed and operated, are affected by inherent limitations. These include the possibility of poor judgment in decision-making, human error, control processes being deliberately circumvented by employees and others, management overriding controls and the occurrence of unforeseeable circumstances.

Future periods

Our assessment of controls is for the period specified only. Historic evaluation of effectiveness is not relevant to future periods due to the risk that:

- the design of controls may become inadequate because of changes in operating environment, law, regulation or other; or
- the degree of compliance with policies and procedures may deteriorate.

Responsibilities of management and Internal Auditors

It is management's responsibility to develop and maintain sound systems of risk management, internal control and governance and for the prevention and detection of irregularities and fraud. Internal audit work should not be seen as a substitute for management's responsibilities for the design and operation of these systems.

We endeavour to plan our work so that we have a reasonable expectation of detecting significant control weaknesses and, if detected, we shall carry out additional work directed towards identification of consequent fraud or other irregularities. However, internal audit procedures alone, even when carried out with due professional care, do not guarantee that fraud will be detected.

Accordingly, our examinations as internal auditors should not be relied upon solely to disclose fraud, defalcations or other irregularities which may exist.

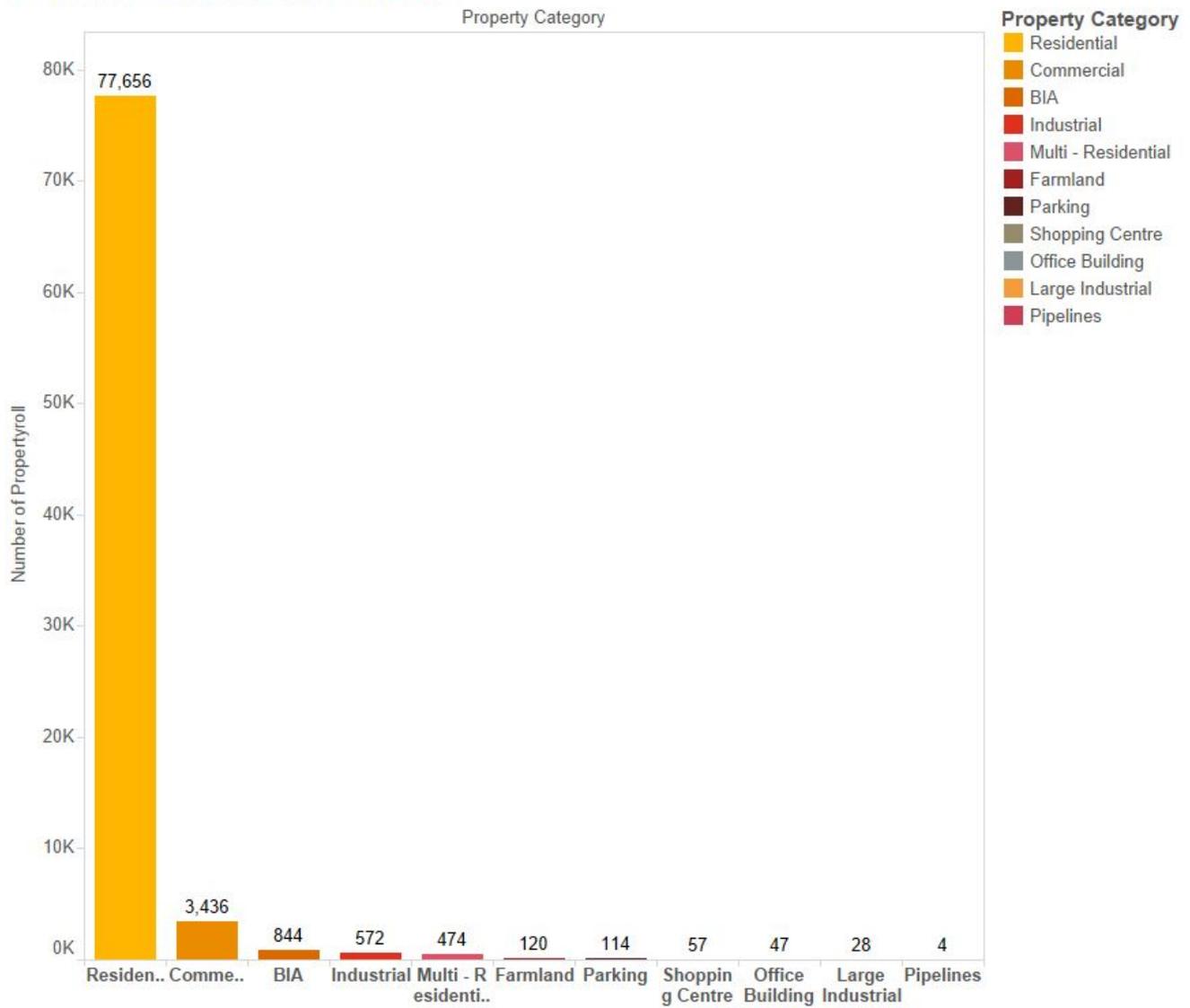
Appendix C: Data visuals

Below are some data visuals for management to observe various trends and analytics. Data analytics was applied to the data population from AMANDA Tax Module provided by management for the scope period Jan 01 2017 to Dec 31, 2017.

C1 - Property analysis

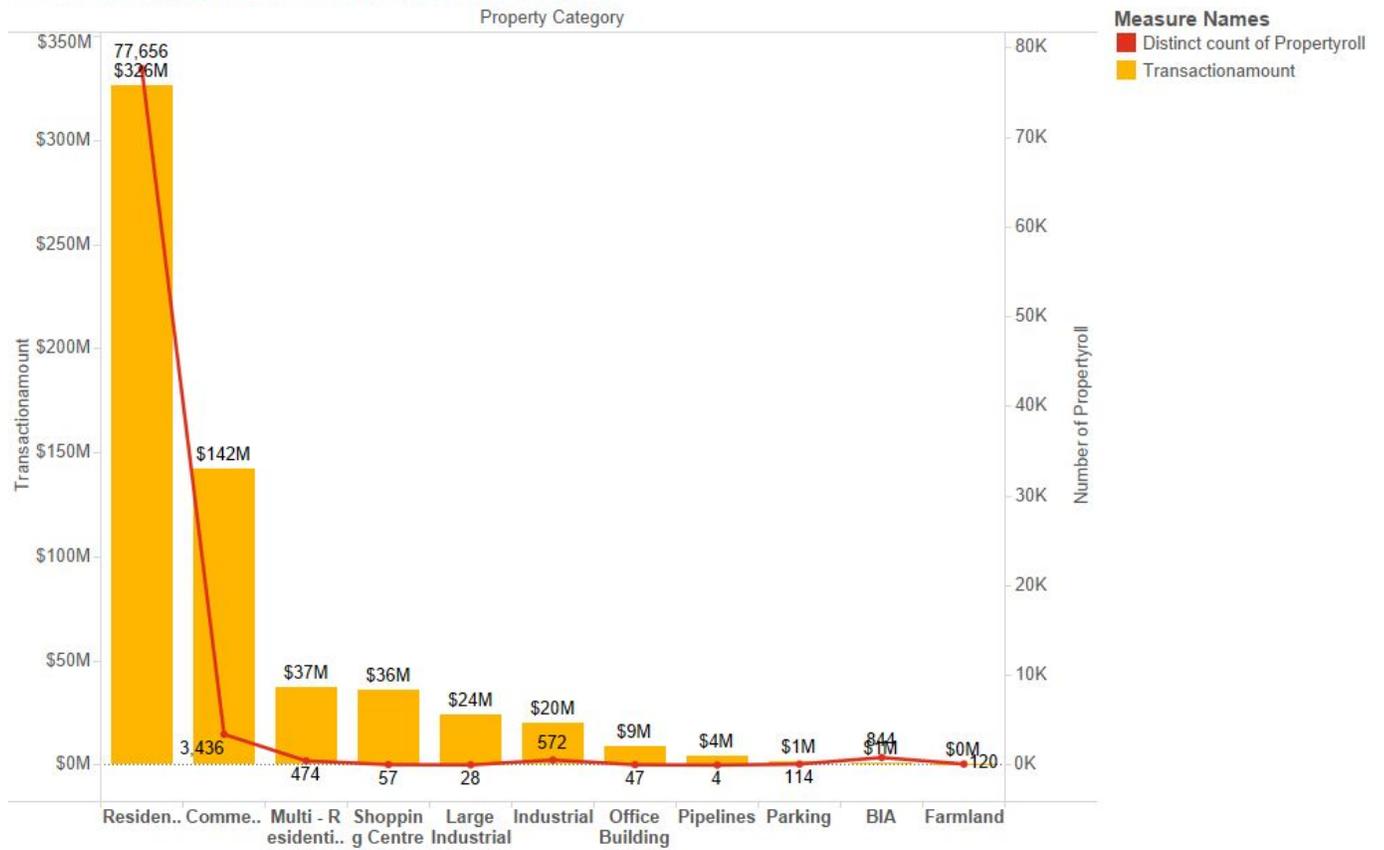
The first visual below depicts various types of properties from which transactions were made and the number of transactions associated to each property type. These include transactions relating to bills, payments, adjustments and installment in the general ledger account. The second visual that follows illustrates the dollar amount of transactions processed from various types of properties. As such, the charts below indicate that the residential property comprises about 77,656 properties, which have transaction amounts processed totalling \$326 million.

Property Category Distribution



Distinct count of Propertyroll for each Property Category. Color shows details about Property Category.

Transaction Amount by Property Category

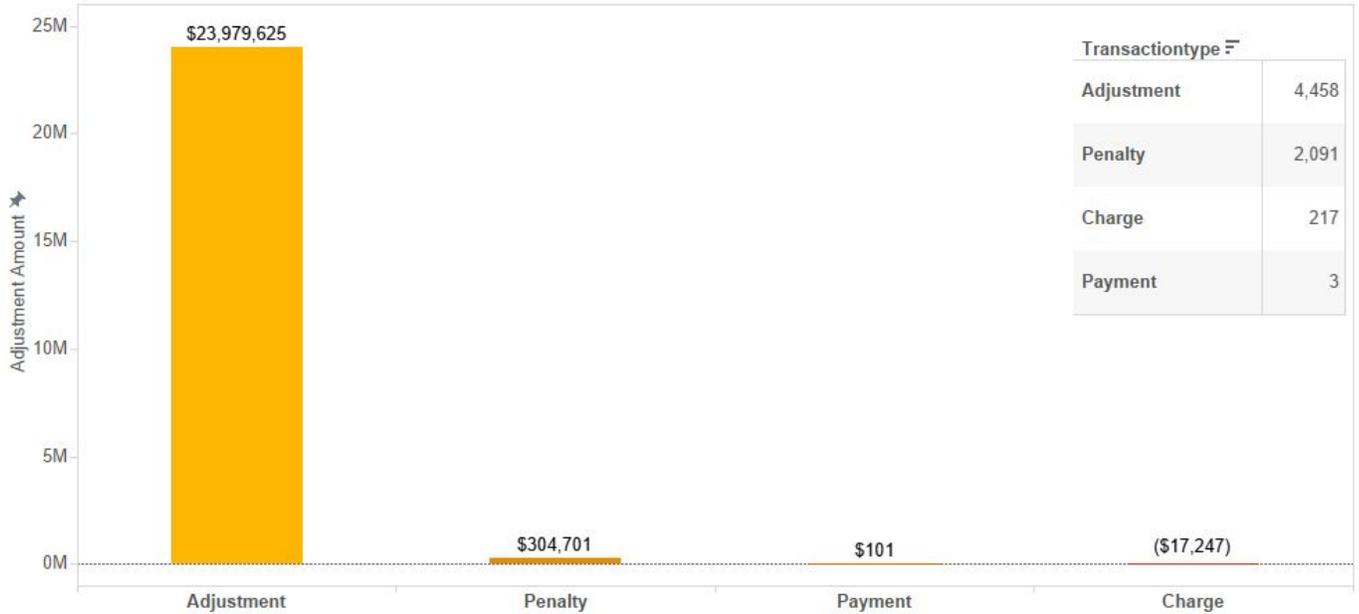


Total Transaction amount and number of Propertyroll for each Property Category. Color shows details about Transaction amount (in millions) and distinct count of Propertyroll.

C2 - Adjustments analysis

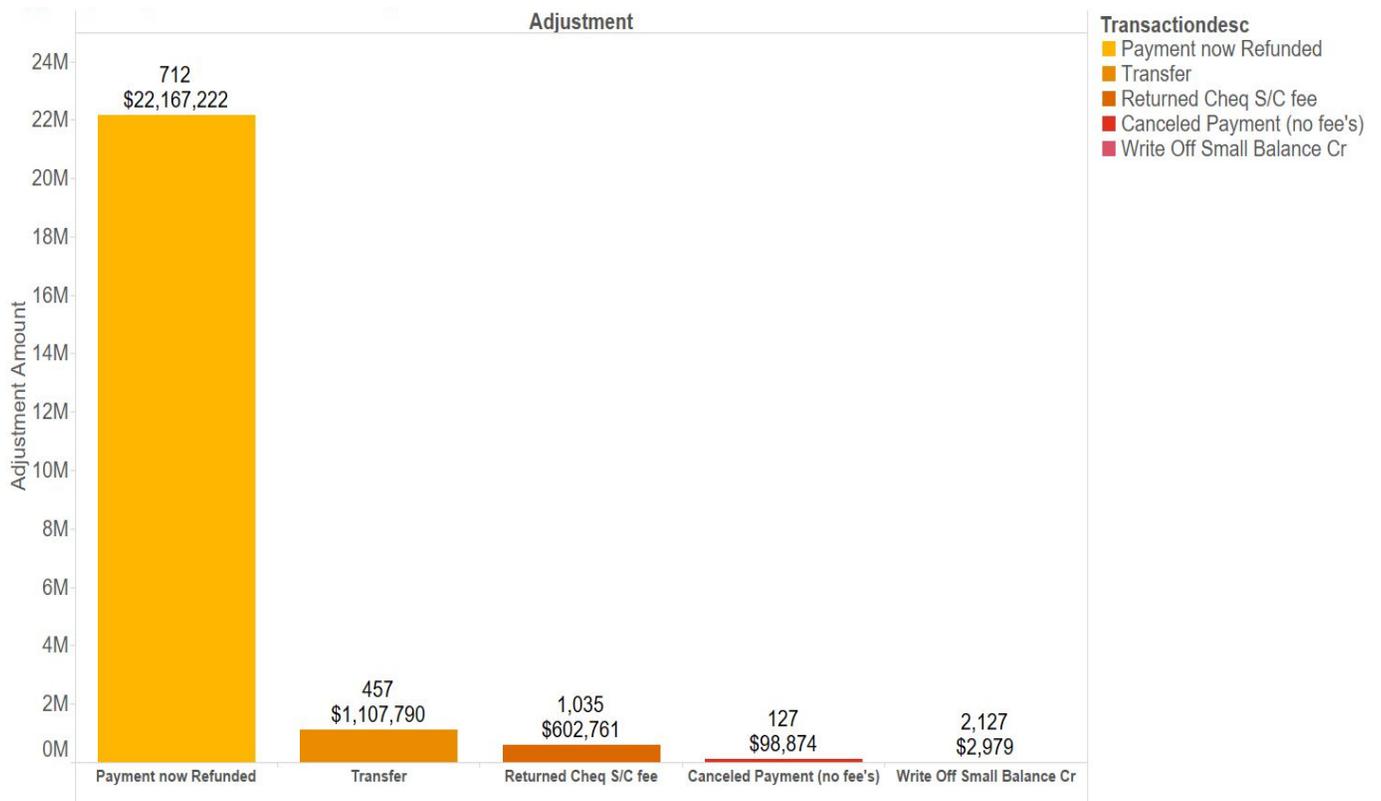
The chart below illustrates the four different types of adjustments including; adjustments, penalties, payment and charges, recorded during the period under review, along with the total number of each of type of adjustment (supporting table on the right) and their associated dollar values. The break-down of the category “adjustments” is depicted in the visual on page 19.

Adjustment Amount by type



The visual below shows the different sub-categories of adjustments which include payment refunded, transfer, returned cheque fee, canceled payment and write off small balances. This chart illustrates the number of each type of adjustment and the dollar value associated to it. For instance, there were 712 number of adjustments in the category 'Payments refunded' totalling to about \$22 million. As per management, in the year 2017, there were significant number of assessment appeals that were finalized that bridged several years which resulted in large retrospective settlements.

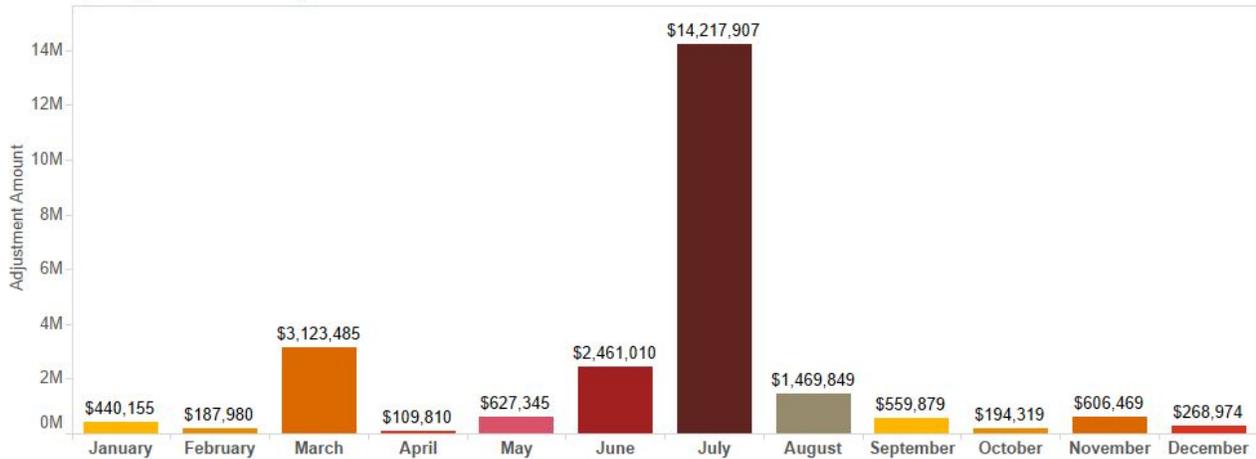
Sub-categories of adjustments



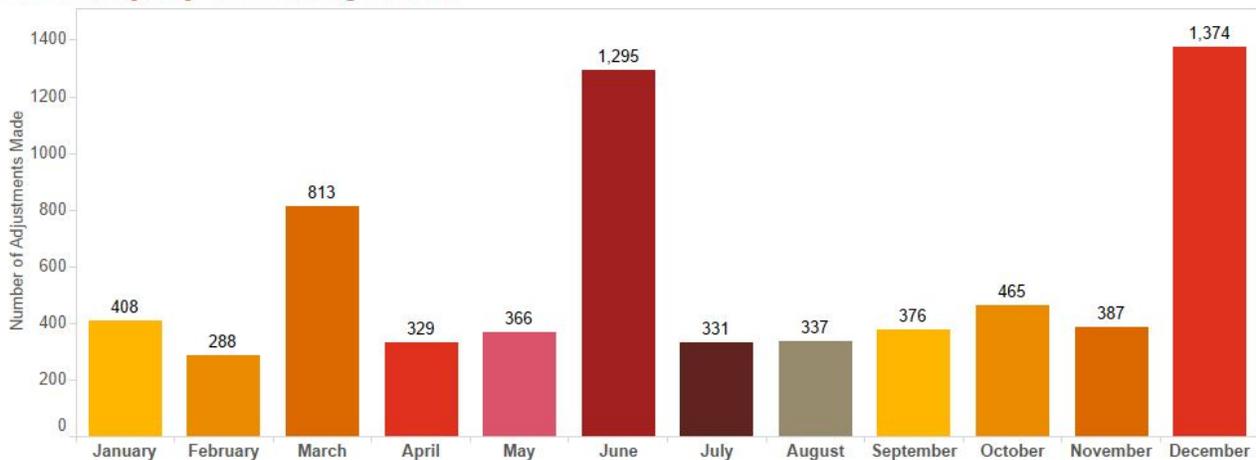
The visuals below illustrate the month over month trend of total dollar value of the adjustments and the number of adjustment made per month for all adjustment type i.e. adjustments, penalty, payment and charges.

The high dollar value of the ‘Sum of Adjustments’ for the month of July is a result of the high ‘Number of Adjustments’ that were made in the month of June. The high number of adjustments made during the months are owing to the fact that final and interim tax bills are processed in those months. However, the adjusted dollar amounts after executing the adjustments are seen in the following month once the processing is complete.

Sum of Adjustments by Month

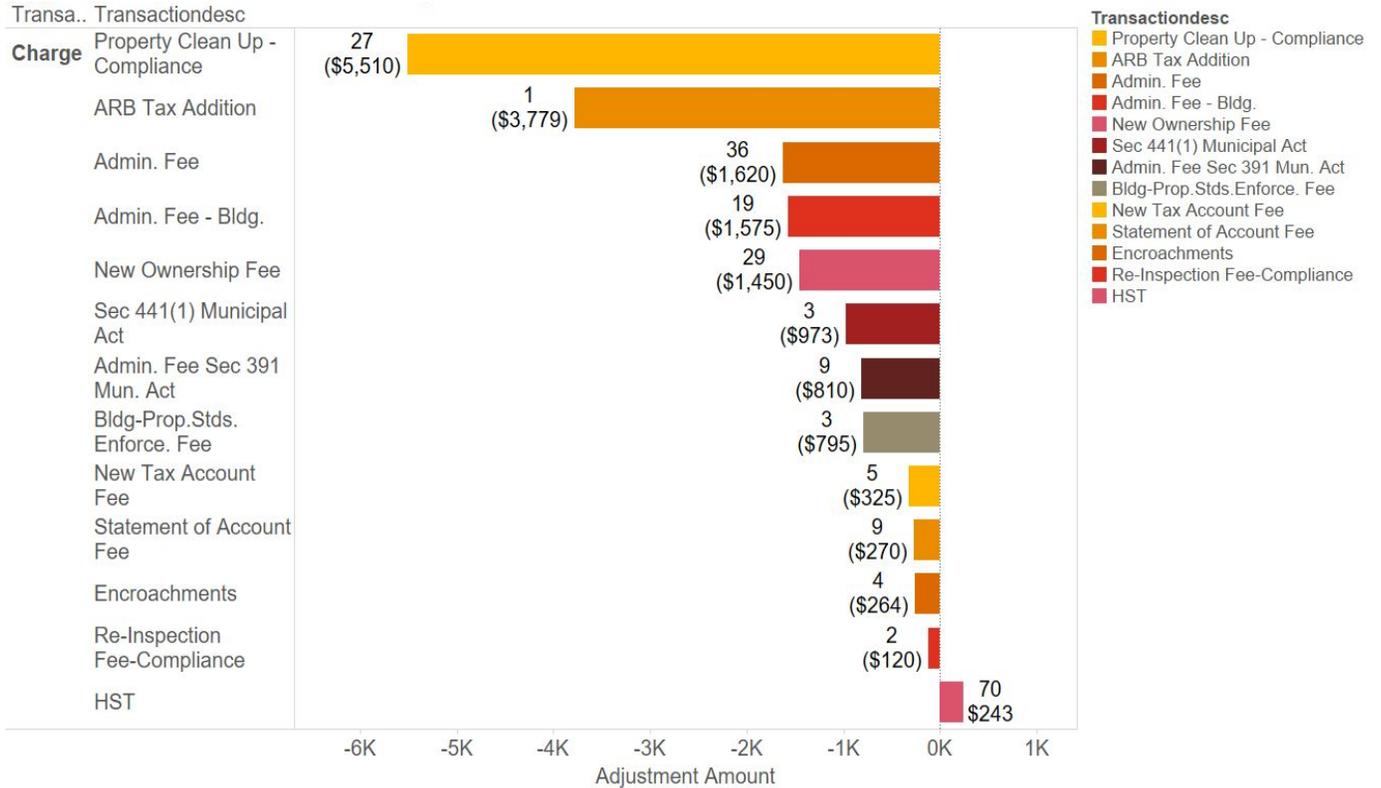


Number of Adjustments by Month



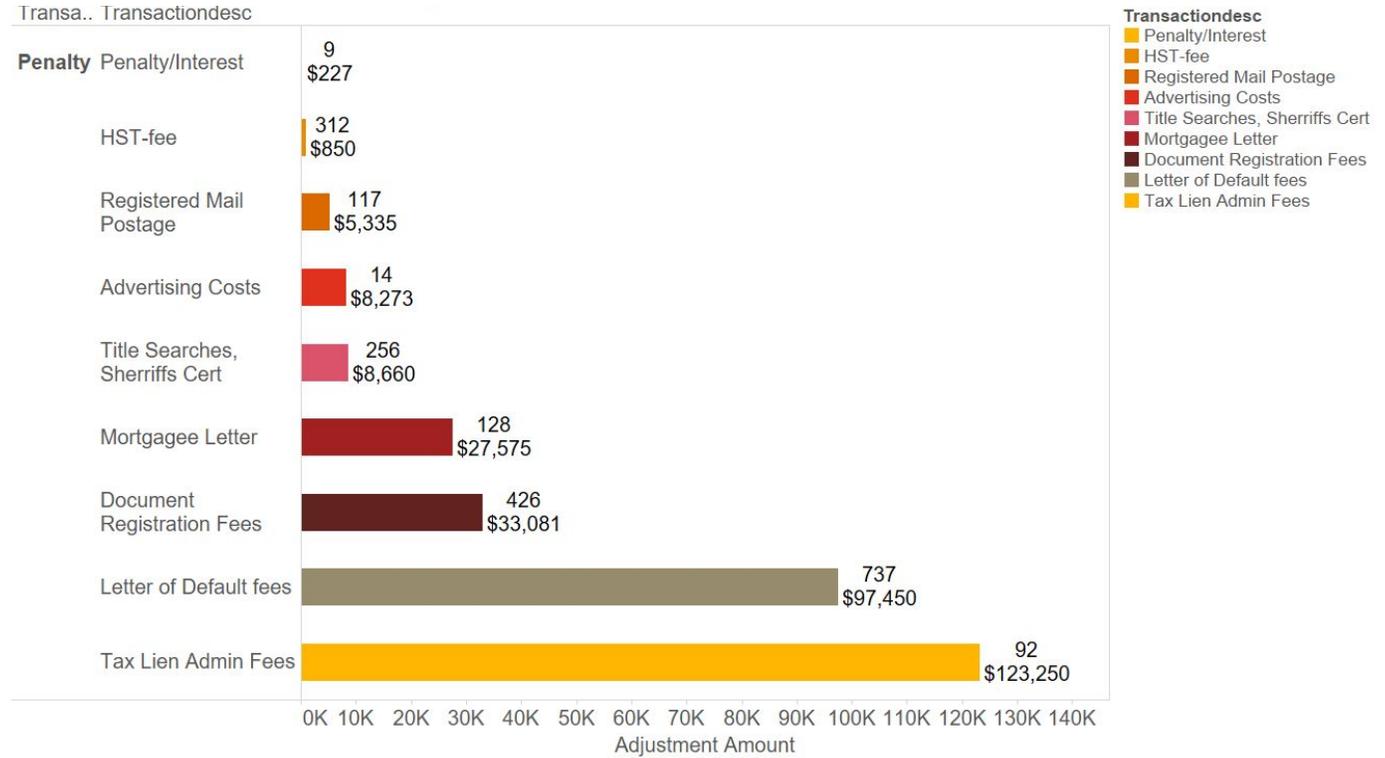
The visual below displays the different types of charges that can be incurred, along with their count and associated dollar value. These charges include Property Clean up, ARB Tax Addition, Admin fees, New Ownership Fees, Statement of Account Fees, Encroachments, HST.

Adjustments - Charges



The visual below displays all the subcategories of the types of adjustments which include penalty/interest, HST-fee, registered mail postage, advertising costs, letter of default fees and tax lien admin fees. As an example, we can see that a total of 92 adjustments were made against category ‘Tax lien admin fees’ accruing to around \$123,250 million.

Adjustments - Added charges

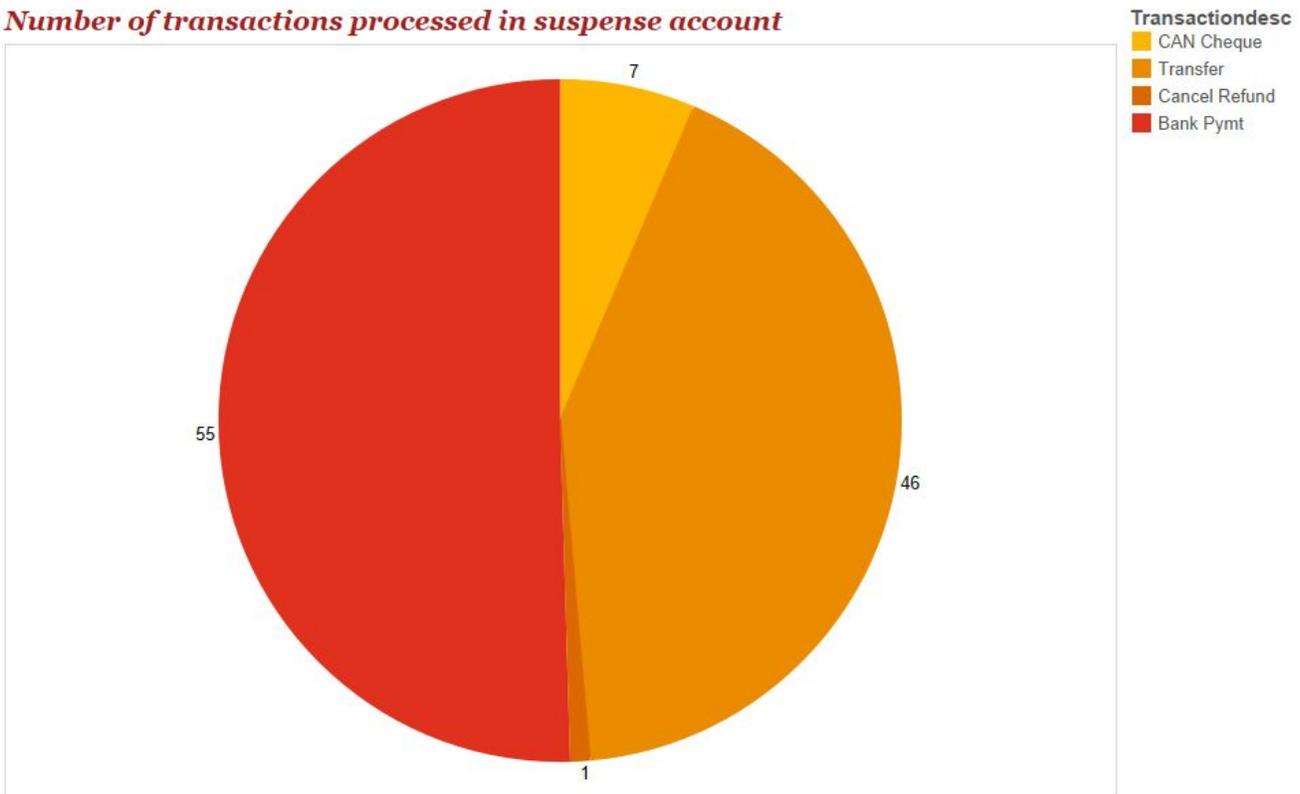


C3 - Suspense account analysis

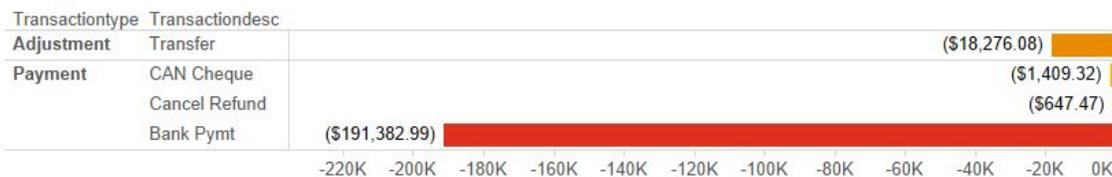
The pie chart below illustrates the breakdown of the number of transaction processed in the suspense account and the amount of payment processed during scope period of January 1, 2017 to December 31, 2017. This account is used where payments which cannot be readily identified are posted in order that the payment batch is balanced to the information provided by the bank. The account is reviewed regularly and payments are transferred to taxpayer accounts once the payment/account has been identified.

Visual below indicates transactions for suspense account where the large number of unidentified payment was received via bank payments and were transferred to suspense account:

Number of transactions processed in suspense account

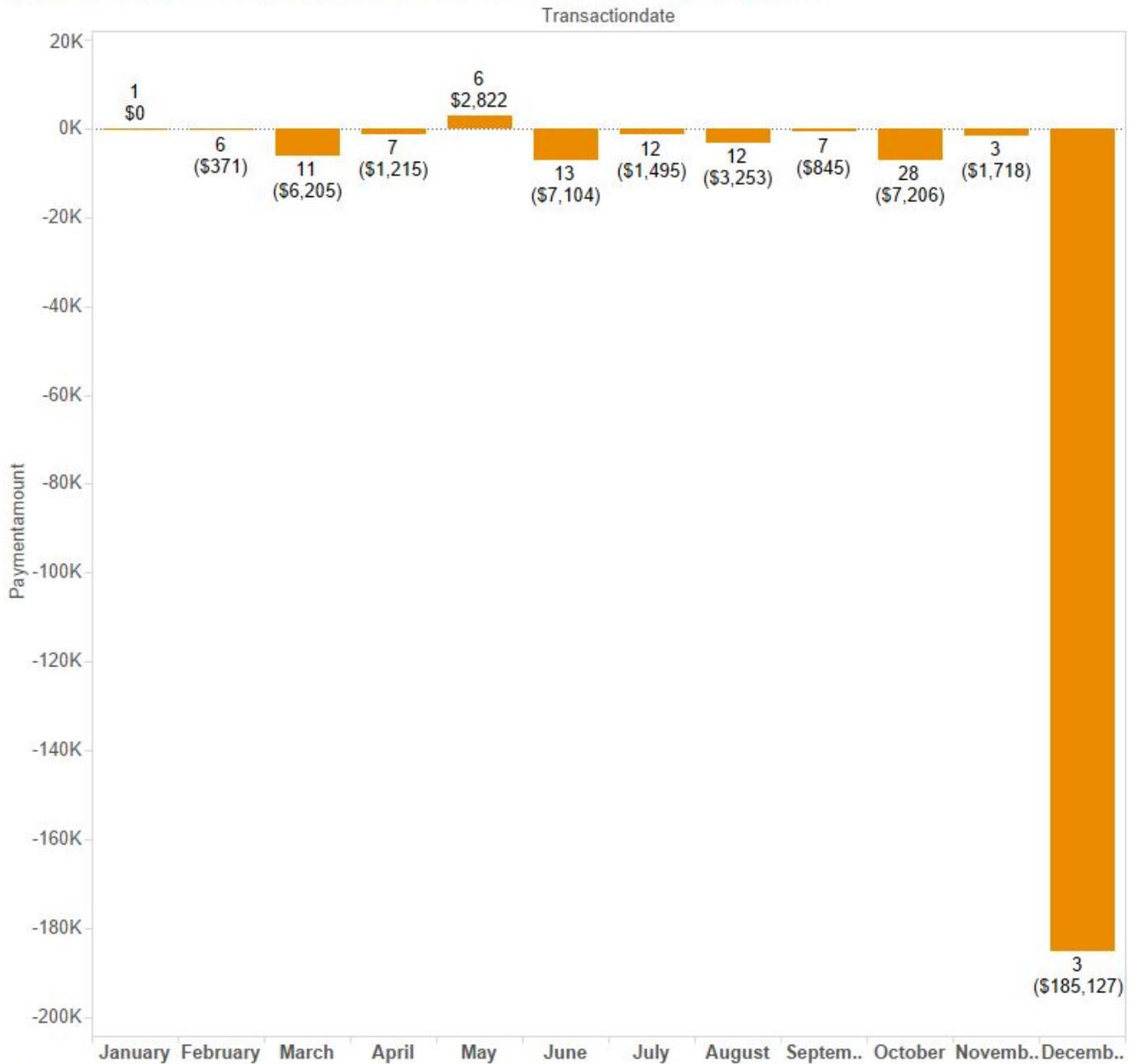


Suspense Account Transaction



The chart below shows the number of transactions entered into the suspense account each month and the associated dollar value.

Monthly Transactions and Amount in Suspense Account



Sum of Paymentamount for each Transactiondate Month. The marks are labeled by sum of Number of Records and sum of Paymentamount.



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