Laguna Lakes Community Development District

ANNUAL FINANCIAL REPORT

September 30, 2018

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REPORT OF INDEPENDENT AUDITORS

To the Board of Supervisors Laguna Lakes Community Development District Lee County, FL

Report on the Financial Statements

We have audited the accompanying financial statements of Laguna Lakes Community Development District as of and for the year ended September 30, 2018, and the related notes to financial statements, which collectively comprise the District's basic financial statements as listed in the table of contents.

Management's Responsibility for the Financial Statements

Management is responsible for the preparation and fair presentation of these financial statements in accordance with accounting principles generally accepted in the United States of America; this includes 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 these financial statements based on our audit. We conducted our audit in accordance with auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Accounting Standards*, issued by the Comptroller General of the United States. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free from material misstatement.

An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the financial statements. The procedures selected depend on the auditor's judgment, including the assessment of the risks of material misstatement of the financial statements, 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 statements 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 statements.

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

Fort Pierce / Stuart



To the Board of Supervisors Laguna Lakes Community Development District

Opinion

In our opinion, the financial statements referred to above present fairly, in all material respects, the respective financial position of the governmental activities, the General Fund, and Debt Service Fund of Laguna Lakes Community Development District, as of September 30, 2018, and the respective changes in financial position and the budgetary comparison for the General Fund for the year then ended in conformity with accounting principles generally accepted in the United States of America.

Other Matters

Required Supplementary Information

Accounting principles generally accepted in the United States of America require that the Management Discussion and Analysis on pages 3-8 be presented to supplement the basic financial statements. Such information, although not a part of the basic financial statements, is required by the Governmental Accounting Standards Board who considers it to be an essential part of financial reporting for placing the basic financial statements in an appropriate operational, economic, or historical context. We have applied certain limited procedures to the required supplementary information in accordance with auditing standards generally accepted in the United States of America, which consisted of inquiries of management about the methods of preparing the information and comparing the information for consistency with management's responses to our inquiries, the basic financial statements, and other knowledge we obtained during our audit of the basic financial statements. We do not express an opinion or provide any assurance on the information because the limited procedures do not provide us with sufficient evidence to express an opinion or provide any assurance.

Other Reporting Required by Government Auditing Standards

In accordance with *Government Auditing Standards*, we have also issued a report dated July 9, 2019 on our consideration of the District's internal control over financial reporting and on our tests of its compliance with certain provisions of laws, regulations and contracts. The purpose of that report is 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 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 Laguna Lakes Community Development District's internal control over financial reporting and compliance.

Berger, Toombs, Elam, Gaines & Frank Certified Public Accountants PL

Fort Pierce, Florida

July 9, 2019

Management's discussion and analysis of Laguna Lakes Community Development District (the "District") financial performance provides an objective and easily readable analysis of the District's financial activities. The analysis provides summary financial information for the District and should be read in conjunction with the District's financial statements.

OVERVIEW OF THE FINANCIAL STATEMENTS

The District's basic financial statements comprise three components; 1) Government-wide financial statements, 2) Fund financial statements, and 3) Notes to financial statements. The Government-wide financial statements present an overall picture of the District's financial position and results of operations. The Fund financial statements present financial information for the District's major funds. The Notes to financial statements provide additional information concerning the District's finances.

The Government-wide financial statements are the **statement of net position** and the **statement of activities**. These statements use accounting methods similar to those used by private-sector companies. Emphasis is placed on the net position of governmental activities and the change in net position. Governmental activities are primarily supported by special assessments.

The **statement of net position** presents information on all assets and liabilities of the District, with the difference between assets and liabilities reported as net position. Net position is reported in three categories; 1) net investment in capital assets, 2) restricted, and 3) unrestricted. Assets, liabilities, and net position are reported for all Governmental activities.

The **statement of activities** presents information on all revenues and expenses of the District and the change in net position. Expenses are reported by major function and program revenues relating to those functions are reported, providing the net cost of all functions provided by the District. To assist in understanding the District's operations, expenses have been reported as governmental activities. Governmental activities financed by the District include general government and debt service.

Fund financial statements present financial information for governmental funds. These statements provide financial information for the major funds of the District. Governmental fund financial statements provide information on the current assets and liabilities of the funds, changes in current financial resources (revenues and expenditures), and current available resources.

OVERVIEW OF THE FINANCIAL STATEMENTS (CONTINUED)

Fund financial statements include a balance sheet and a statement of revenues, expenditures and changes in fund balances for all governmental funds. A statement of revenues, expenditures, and changes in fund balances – budget and actual is provided for the District's General Fund. Fund financial statements provide more detailed information about the District's activities. Individual funds are established by the District to track revenues that are restricted to certain uses or to comply with legal requirements.

The government-wide financial statements and the fund financial statements provide different pictures of the District. The government-wide financial statements provide an overall picture of the District's financial standing. These statements are comparable to private-sector companies and give a good understanding of the District's overall financial health and how the District paid for the various activities, or functions, provided by the District. All assets of the District, including buildings and improvements, and infrastructure are reported in the **statement of net position**. All liabilities, including principal outstanding on bonds are included. The **statement of activities** includes depreciation on all long-lived assets of the District, but transactions between the different functions of the District have been eliminated in order to avoid "doubling up" the revenues and expenses. The fund financial statements provide a picture of the major funds of the District. In the case of governmental activities, outlays for long lived assets are reported as expenditures and long-term liabilities, such as general obligation bonds, are not included in the fund financial statements. To provide a link from the fund financial statements to the government-wide financial statements, reconciliations are provided from the fund financial statements to the government-wide financial statements.

Notes to financial statements provide additional detail concerning the financial activities and financial balances of the District. Additional information about the accounting practices of the District, investments of the District, capital assets and long-term debt are some of the items included in the *notes to financial statements*.

Financial Highlights

The following are the highlights of financial activity for the year ended September 30, 2018.

- ◆ The District's total assets exceeded total liabilities by \$1,342,683 (net position). Net investment in capital assets for the District was \$1,152,399. Unrestricted net position for Governmental Activities was \$73,129. Governmental activities restricted net position was \$117,155.
- ♦ Governmental activities revenues totaled \$880,266 while governmental activities expenses totaled \$730,510.

OVERVIEW OF THE FINANCIAL STATEMENTS (CONTINUED)

Financial Analysis of the District

The following schedule provides a summary of the assets, liabilities and net position of the District and is presented by category for comparison purposes.

Net Position

	Governmental Activities				
		2018	_	2017	
Current assets Restricted assets Capital assets Total Assets	\$	263,590 36,593 5,381,609 5,681,792	<u>-</u>	\$ 271,894 36,252 5,447,165 5,755,311	
Deferred Outflow of Resources		501,263	_	429,730	
Total Assets and Deferred Outflows		6,183,055	_	6,185,041	
Current liabilities Non-current liabilities Total Liabilities		326,986 4,513,386 4,840,372	-	347,926 4,644,188 4,992,114	
Net Position Net investment in capital assets Restricted Unrestricted		1,152,399 117,155 73,129	_	1,037,707 172,467 (17,247)	
Total Net Position	\$	1,342,683	=	\$ 1,192,927	

The decrease in capital assets is associated with current year depreciation.

The decrease in long term liabilities is the result of the bond refunding in the current year.

OVERVIEW OF THE FINANCIAL STATEMENTS (CONTINUED)

Financial Analysis of the District (Continued)

The following schedule provides a summary of the changes in net position of the District and is presented by category for comparison purposes.

Change In Net Position

	Governmental Activities				
		2018			2017
Program Revenues Charges for services	\$	855,149	•	\$	790,392
General Revenues Miscellaneous Investment earnings		1,079 24,038			889 133
Total Revenues		880,266			791,414
Expenses General government		93,421			111,358
Physical environment		459,507			483,320
Interest and other charges Total Expenses		177,582 730,510			334,827 929,505
Change in Net Position		149,756			(138,091)
Net Position - Beginning of Year		1,192,927			1,331,018
Net Position - End of Year	\$	1,342,683		\$	1,192,927

The decrease in general government expenses is mainly related to the decrease in legal fees and legal advertising in the current year.

The decrease in physical environment was related to the decrease in irrigation maintenance expenses.

OVERVIEW OF THE FINANCIAL STATEMENTS (CONTINUED)

Capital Assets Activity

The following schedule provides a summary of the District's capital assets as of September 30, 2018 and 2017.

	Governmental Activities				
	2018			2017	
	•	100010	•		
Construction in progress	\$	196,312	\$	52,843	
Land and improvements		3,513,622		3,513,622	
Infrastructure		2,977,105		2,977,105	
Improvements		1,689,994		1,689,994	
Less: accumulated depreciation		(2,995,424)		(2,786,399)	
Governmental Activities Capital Assets	\$	5,381,609	\$	5,447,165	

During the year, depreciation was \$209,025 and \$143,469 was added to construction in progress.

General Fund Budgetary Highlights

The budget exceeded governmental expenditures primarily due to lower irrigation improvement and repair and maintenance expenditures than were anticipated.

The September 30, 2018 budget was amended for a transfer in and greater irrigation improvements than were originally anticipated.

Debt Management

- In August 2017, the District issued \$562,973 Special Assessment Revenue Note, Series 2017A-1. The Series 2017A-1 Note was issued to pay off the outstanding bank loan. Of the total amount, \$449,188 was requested in fiscal year 2017. The remaining \$113,875 was requested in the current fiscal year. As of September 30, 2018, the balance outstanding was \$562,973.
- ♦ In February 2018, the District issued \$4,200,000 Special Assessment Revenue Note, Series 2017A-2. The Series 2017A-2 Note was issued to refund and retire the Series 2007 bonds. As of September 30, 2018, the balance outstanding was \$4,200,000.

OVERVIEW OF THE FINANCIAL STATEMENTS (CONTINUED)

Economic Factors and Next Year's Budget

Laguna Lakes Community Development District does not expect any economic factors to have any significant effect on the financial position or results of operations of the District in fiscal year 2019.

Request for Information

The financial report is designed to provide a general overview of Laguna Lakes Community Development District's finances for all those with an interest. Questions concerning any of the information provided in this report or requests for additional information should be addressed to the Laguna Lakes Community Development District, Premier District Management, 1992 Victoria Lane, Suite B, Fort Myers, FL 33901.

Laguna Lakes Community Development District STATEMENT OF NET POSITION September 30, 2018

	Governmental Activities	
ASSETS		
Current Assets		
Cash	\$	254,780
Prepaid expenses		8,310
Deposits		500
Total Current Assets		263,590
Non-Current Assets		
Restricted Assets		
Investments - debt service		36,593
Capital Assets, Not Being Depreciated		
Land and improvements		3,513,622
Construction in progress		196,312
Capital Assets, Being Depreciated		
Infrastructure		2,977,105
Improvements		1,689,994
Less: accumulated depreciation		(2,995,424)
Total Non-current Assets		5,418,202
Total Assets		5,681,792
DEFERRED OUTFLOW OF RESOURCES		
Deferred amount on refunding, net		501,263
Total Assets and Deferred Outflow of Resources		6,183,055
LIABILITIES		
Current Liabilities		
Accounts payable and accrued expenses		10,916
Bonds payable, current portion		249,587
Accrued interest		66,483
Total Current Liabilities	-	326,986
Non-Current Liabilities Bonds payable		4,513,386
Total Liabilities		4,840,372
NET POSITION		
Net investment in capital assets		1,152,399
Restricted - debt service		117,155
Unrestricted		73,129
Total Net Position	\$	1,342,683

Laguna Lakes Community Development District STATEMENT OF ACTIVITIES For the Year Ended September 30, 2018

						(Expenses) venues and
			F	Program	С	hanges in
			R	evenues	Ne	et Position
			Cł	narges for	Go	vernmental
Functions/Programs	E	xpenses	5	Services	ces Acti	
Governmental Activities						
General government	\$	(93,421)	\$	120,510	\$	27,089
Physical environment		(459,507)		323,112		(136,395)
Interest on long-term debt		(177,582)		411,527		233,945
Total Governmental Activities	\$	(730,510)	\$	855,149		124,639
	Ger	neral Revenues	S			
		vestment incon				24,038
	M	liscellaneous re	venues	5		1,079
		Total Genera	l Reve	nues		25,117
		Change in N	Net Pos	sition		149,756
	Net	Position - Octo	ber 1, 2	2017		1,192,927
	Net	Position - Sept	ember	30, 2018	\$	1,342,683

Laguna Lakes Community Development District BALANCE SHEET GOVERNMENTAL FUNDS September 30, 2018

					Total
			Debt	Gov	vernmental
	(General	 Service		Funds
ASSETS					
Cash	\$	254,780	\$ -	\$	254,780
Due from other funds		-	179,545		179,545
Prepaid expenses		8,310	-		8,310
Deposits		500	-		500
Restricted assets					
Investments, at fair value			36,593		36,593
Total Assets	\$	263,590	\$ 216,138	\$	479,728
LIABILITIES AND FUND BALANCES LIABILITIES Accounts payable and accrued expenses Due to other funds Total Liabilities	\$	10,916 179,545 190,461	\$ - - - -	\$	10,916 179,545 190,461
FUND BALANCES Nonspendable - prepaid expenses/deposits Restricted - debt service Unassigned Total Fund Balances		8,810 - 64,319 73,129	216,138 - 216,138		8,810 216,138 64,319 289,267
Total Liabilities and Fund Balances	\$	263,590	\$ 216,138	\$	479,728
	_	·	·		·

Laguna Lakes Community Development District RECONCILIATION OF TOTAL GOVERNMENTAL FUND BALANCES TO NET POSITION OF GOVERNMENTAL ACTIVITIES September 30, 2018

Total Governmental Fund Balances	\$ 289,267
Amounts reported for governmental activities in the Statement of Net Position are different because:	
Capital assets, land (\$3,513,622), construction in progress (\$196,312), infrastructure (\$2,977,105), and improvements (\$1,689,994), net of accumulated depreciation (\$(2,995,424)) used in governmental activities are not current financial resources and; therefore, are not reported at the fund level.	5,381,609
Deferred outflows of resources, deferred amount on refunding, net, are not current financial resources, and therefore, are not reported at the fund level.	501,263
Long-term liabilities, including bonds payable, are not due and payable in the current period and; therefore, are not reported at the fund level.	(4,762,973)
Accrued interest expense for long-term debt is not a current financial use and; therefore, is not reported at the fund level.	(66,483)

\$ 1,342,683

Net Position of Governmental Activities

Laguna Lakes Community Development District STATEMENT OF REVENUES, EXPENDITURES AND CHANGES IN FUND BALANCES – GOVERNMENTAL FUNDS For the Year Ended September 30, 2018

	(General		Debt Service	Go	Total overnmental Funds
Revenues						
Special assessments	\$	443,622	\$	411,527	\$	855,149
Miscellaeous revenues		1,079		-		1,079
Investment income		636		23,402		24,038
Total Revenues		445,337		434,929		880,266
Expenditures						
Current						
General government		93,421		-		93,421
Physical environment		250,482		-		250,482
Capital outlay		143,469		-		143,469
Debt service						
Principal		-		4,390,000		4,390,000
Interest		-		152,264		152,264
Other debt service costs				118,459		118,459
Total Expenditures		487,372		4,660,723		5,148,095
Total Revenues over/(under) Total Expenditures		(42,035)	((4,225,794)		(4,267,829)
Other Financing Sources/(Uses)						
Transfers in		132,411		-		132,411
Transfers out		-		(132,411)		(132,411)
Issuance of long term debt		-		4,313,785		4,313,785
Total Other Financing Sources/(Uses)		132,411		4,181,374		4,313,785
Net Change in Fund Balances		90,376		(44,420)		45,956
Fund Balances - October 1, 2017		(17,247)		260,558		243,311
Fund Balances - September 30, 2018	\$	73,129	\$	216,138	\$	289,267

Laguna Lakes Community Development District RECONCILIATION OF THE STATEMENT OF REVENUES, EXPENDITURES AND CHANGES IN FUND BALANCES OF GOVERNMENTAL FUNDS TO THE STATEMENT OF ACTIVITIES

For the Year Ended September 30, 2018

Net Change in Fund Balances - Total Governmental Funds	\$	45,956
Amounts reported for governmental activities in the Statement of Activities are different because:		
Governmental funds report capital outlays as expenditures. However, in the Statement of Activities, the cost of those assets is allocated over their estimated useful lives as depreciation expense. This is the amount depreciation (\$(209,025)) exceeded capital outlay (\$143,469) in the current period.		(65,556)
The proceeds from the issuance of long-term debt is reported as an other financing source at the fund level, however, at the government-wide level the issaunce of long term debt increases non-current liabilities.	,	(4,313,785)
The excess amount of new debt over the amount needed to pay-off the debt refunded is recognized as other debt service costs at the fund level, however, at the government-wide level these costs are capitalized as a deferred outflow of resources, deferred amount on refunding, and amortized over the life of the new debt.	i	105,709
Repayments of bond principal are reported as expeditures at the fund level statements, but reduce long term debt in the Statement of Net Position.		4,390,000
Deferred amount on refunding is amortized as interest over the life of the new bonds payable series. This is the amortization for the current year.		(34,176)
In the Statement of Activities, interest is accrued on outstanding bonds; whereas at the governmental funds level, interest expenditures are reported when due. This is the change in accrued interest in the current period.		21,608
Change in Net Position of Governmental Activities	\$	149,756

Laguna Lakes Community Development District STATEMENT OF REVENUES, EXPENDITURES AND CHANGES IN FUND BALANCES – BUDGET AND ACTUAL – GENERAL FUND For the Year Ended September 30, 2018

	Original Budget	Final Budget	Actual	Variance with Final Budget Positive (Negative)
Revenues				
Special assessments	\$ 441,714	\$ 443,622	\$ 443,622	\$ -
Miscellaneous revenues	100	1,000	1,079	79
Investment income	500	658	636	(22)
Total Revenues	442,314	445,280	445,337	57
Expenditures Current				
General government	96,192	94,340	93,421	919
Physical environment	278,659	482,118	250,482	231,636
Capital outlay			143,469	(143,469)
Total Expenditures	374,851	576,458	487,372	89,086
Revenues over/(under) Expenditures	67,463	(131,178)	(42,035)	89,143
Other Financing Sources/(Uses) Transfers in		131,178	132,411	1,233
Net Change in Fund Balances	67,463	-	90,376	90,376
Fund Balances - October 1, 2017	(5,371)		(17,247)	(17,247)
Fund Balances - September 30, 2018	\$ 62,092	\$ -	\$ 73,129	\$ 73,129

NOTE A - SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

The financial statements of the District have been prepared in conformity with generally accepted accounting principles (GAAP) as applied to governmental units. The Governmental Accounting Standards Board (GASB) is the accepted standard-setting body for establishing governmental accounting and financial reporting principles. The District's more significant accounting policies are described below.

1. Reporting Entity

The District was established on November 6, 2002, pursuant to the Uniform Community Development District Act of 1980, Chapter 190, Florida Statutes, as amended (the "Act"), by Ordinance #02-033 of the Board of County Commissioners of Lee County, as a Community Development District. The District was established for the purposes of financing and managing the acquisition, construction, maintenance and operation of the infrastructure necessary for community development within its jurisdiction. The District is authorized to issue bonds for the purpose, among others, of financing, funding, planning, establishing, acquiring, constructing district roads, landscaping, and other basic infrastructure projects within or outside the boundaries of the Laguna Lakes Community Development District. The District is governed by a five-member Board of Supervisors who are elected to four year terms. The District operates within the criteria established by Chapter 190.

As required by GAAP, these financial statements present the Laguna Lakes Community Development District (the primary government) as a stand-alone government. The reporting entity for the District includes all functions of government in which the District's Board exercises oversight responsibility including, but not limited to, financial interdependency, selection of governing authority, designation of management, significant ability to influence operations and accountability for fiscal matters.

Based upon the application of the above-mentioned criteria, the District has identified no component units.

2. Measurement Focus and Basis of Accounting

The basic financial statements of the District are composed of the following:

- Government-wide financial statements
- Fund financial statements
- Notes to financial statements

NOTE A – SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (CONTINUED)

2. Measurement Focus and Basis of Accounting (Continued)

a. Government-wide Financial Statements

Government-wide financial statements report all non-fiduciary information about the reporting government as a whole. These statements include all the governmental activities of the primary government. The effect of interfund activity has been removed from these statements.

Governmental activities are supported by special assessments and interest. Program revenues are netted with program expenses in the statement of activities to present the net cost of each program

Amounts paid to acquire capital assets are capitalized as assets, rather than reported as an expenditure. Proceeds of long-term debt are recorded as liabilities in the government-wide financial statements, rather than as an other financing source.

Amounts paid to reduce long-term indebtedness of the reporting government are reported as a reduction of the related liability, rather than as an expenditure.

b. Fund Financial Statements

The underlying accounting system of the District is organized and operated on the basis of separate funds, each of which is considered to be a separate accounting entity. The operations of each fund are accounted for with a separate set of self-balancing accounts that comprise its assets, liabilities, fund equity, revenues and expenditures or expenses, as appropriate. Governmental resources are allocated to and accounted for in individual funds based upon the purposes for which they are to be spent and the means by which spending activities are controlled.

Fund financial statements for the primary government's governmental funds are presented after the government-wide financial statements. These statements display information about major funds individually.

NOTE A – SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (CONTINUED)

2. Measurement Focus and Basis of Accounting (Continued)

b. Fund Financial Statements (Continued)

Governmental Funds

The District classifies fund balance according to Governmental Accounting Standards Board Statement 54 – Fund Balance Reporting and Governmental Fund Type Definitions. The Statement requires the fund balance for governmental funds to be reported in classifications that comprise a hierarchy based primarily on the extent to which the government is bound to honor constraints on the specific purposes for which amounts in those funds can be spent.

The District has various policies governing the fund balance classifications.

Nonspendable Fund Balance – This classification consists of amounts that cannot be spent because they are either not in spendable form or are legally or contractually required to be maintained intact.

Restricted Fund Balance – This classification includes amounts that can be spent only for specific purposes stipulated by constitution, external resource providers, or through enabling legislation.

Assigned Fund Balance – This classification consists of the Board of Supervisors' intent to be used for specific purposes, but are neither restricted nor committed. The assigned fund balances can also be assigned by the District's management company.

Unassigned Fund Balance – This classification is the residual classification for the government's general fund and includes all spendable amounts not contained in the other classifications. Unassigned fund balance is considered to be utilized first when an expenditure is incurred for purposes for which amounts in any of those unrestricted fund balance classifications could be used.

Fund Balance Spending Hierarchy – For all governmental funds except special revenue funds, when restricted, committed, assigned, and unassigned fund balances are combined in a fund, qualified expenditures are paid first from restricted or committed fund balance, as appropriate, then assigned and finally unassigned fund balances.

NOTE A – SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (CONTINUED)

2. Measurement Focus and Basis of Accounting (Continued)

b. Fund Financial Statements (Continued)

Governmental Funds (Continued)

Governmental fund financial statements are reported using the current financial resources measurement focus and the modified accrual basis of accounting. Revenues are considered to be available when they are collected within the current period or soon thereafter to pay liabilities of the current period. For this purpose, the District considers revenues to be available if they are collected within 60 days of the end of the current fiscal period.

Expenditures generally are recorded when a liability is incurred, as under accrual accounting. Interest associated with the current fiscal period is considered to be an accrual item and so has been recognized as revenue of the current fiscal period.

Under the current financial resources measurement focus, only current assets and current liabilities are generally included on the balance sheet. The reported fund balance is considered to be a measure of "available spendable resources".

Governmental fund operating statements present increases (revenues and other financing sources) and decreases (expenditures and other financing uses) in net current assets. Accordingly, they are said to present a summary of sources and uses of "available spendable resources" during a period.

Because of their spending measurement focus, expenditure recognition for governmental fund types excludes amounts represented by non-current liabilities. Since they do not affect net current assets, such long-term amounts are not recognized as governmental fund type expenditures or fund liabilities.

Amounts expended to acquire capital assets are recorded as expenditures in the year that resources are expended, rather than as fund assets. The proceeds of long-term debt are recorded as an other financing source rather than as a fund liability.

Debt service expenditures are recorded only when payment is due.

3. Basis of Presentation

a. Governmental Major Funds

<u>General Fund</u> – The General Fund is the District's primary operating fund. It accounts for all financial resources of the general government, except those required to be accounted for in another fund.

NOTE A – SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (CONTINUED)

3. Basis of Presentation (Continued)

a. Governmental Major Funds (Continued)

<u>Debt Service Fund</u> – Accounts for debt service requirements to retire the special assessment bonds which were used to finance the construction of District infrastructure improvements. The bonds are secured by a first lien on and pledge of the pledged revenues.

b. Non-current Governmental Assets/Liabilities

GASB Statement 34 requires that non-current governmental assets, such as land and improvements, and non-current governmental liabilities, such as general obligation bonds and due to developer be reported in the governmental activities column in the government-wide Statement of Net Position.

4. Assets, Liabilities, and Net Position or Equity

a. Cash and Investments

Florida Statutes require state and local governmental units to deposit monies with financial institutions classified as "Qualified Public Depositories," a multiple financial institution pool whereby groups of securities pledged by the various financial institutions provide common collateral from their deposits of public funds. This pool is provided as additional insurance to the federal depository insurance and allows for additional assessments against the member institutions, providing full insurance for public deposits.

The District is authorized to invest in those financial instruments as established by Section 218.415. Florida Statutes. The authorized investments consist of:

- 1. Direct obligations of the United States Treasury;
- 2. The Local Government Surplus Funds Trust or any intergovernmental investment pool authorized pursuant to the Florida Interlocal Cooperative Act of 1969;
- 3. Interest-bearing time deposits or savings accounts in authorized qualified public depositories;
- 4. Securities and Exchange Commission, registered money market funds with the highest credit quality rating from a nationally recognized rating agency.

NOTE A – SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (CONTINUED)

4. Assets, Liabilities, and Net Position or Equity (Continued)

a. Cash and Investments (Continued)

Cash equivalents include time deposits and all highly liquid debt instruments with original maturities of three months or less and held in a qualified public depository as defined by Section 280.02, Florida Statutes.

b. Restricted Assets

Certain net position of the District is classified as restricted on the statement of net position because their use is limited either by law through constitutional provisions or enabling legislation; or by restrictions imposed externally by creditors. In a fund with both restricted and unrestricted net position, qualified expenses are considered to be paid first from restricted net position and then from unrestricted net position.

c. Capital Assets

Capital assets, which include land and improvements, and construction in progress, are reported in the governmental activities column.

The District defines capital assets as assets with an initial, individual cost of \$5,000 or more and an estimated useful life in excess of one year. The valuation basis for all assets is historical cost.

The costs of normal maintenance and repairs that do not add to the value of the asset or materially extend its useful life are not capitalized.

Major outlays for capital assets and improvements are capitalized as projects are constructed.

Depreciation of capital assets is computed and recorded by utilizing the straight-line method. Estimated useful lives of the various classes of depreciable capital assets range from 15 to 40 years.

d. Deferred Outflows of Resources

Deferred outflows of resources represent a consumption of net position/fund balance that applies to a future period(s) and so will not be recognized as an outflow of resources (expense/expenditure) until then. The District only has one item that qualifies for reporting in this category. It is the deferred amount on refunding reported on the Statement of Net Position. A deferred amount on refunding results from the difference in the carrying value of refunded debt and its reacquisition price. This amount is deferred and amortized over the shorter of the life of the refunded or refunding debt.

NOTE A – SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (CONTINUED)

4. Assets, Liabilities, and Net Position or Equity (Continued)

e. Net Position

Equity in the government-wide statement of net position is displayed in three categories: 1) net investment in capital assets, 2) restricted and 3) unrestricted. Net position investment in capital assets, consists of capital assets reduced by accumulated depreciation and by any outstanding debt incurred to acquire, construct, or improve those assets. Net position is reported as restricted when there are legal limitations imposed on their use by District legislation or external restrictions by other governments, creditors, or grantors. Unrestricted net position consists of all net position that does not meet the definition of either of the other two components.

f. Budgets

Budgets are prepared and adopted after public hearings for the governmental funds, pursuant to Chapter 190, Florida Statutes. The District utilizes the same basis of accounting for budgets as it does for revenues and expenditures in its various funds. The legal level of budgetary control is at the fund level. All budgeted appropriations lapse at year end. Formal budgets are adopted for the general and debt service funds. As a result, deficits in the budget columns of the accompanying financial statements may occur.

NOTE B - RECONCILIATION OF GOVERNMENT-WIDE AND FUND FINANCIAL STATEMENTS

1. Explanation of Differences Between the Governmental Fund Balance Sheet and the Government-wide Statement of Net Position

"Total fund balances" of the District's governmental funds, \$289,267, differs from "Net Position" of governmental activities, \$1,342,683, reported in the Statement of Net Position. This difference primarily results from the long-term economic focus of the Statement of Net Position versus the current financial resources focus of the governmental fund balance sheet. The effect of the differences is illustrated below.

NOTE B - RECONCILIATION OF GOVERNMENT-WIDE AND FUND FINANCIAL STATEMENTS (CONTINUED)

1. Explanation of Differences Between the Governmental Fund Balance Sheet and the Government-wide Statement of Net Position (Continued)

Capital related items

When capital assets (land, buildings and improvements and infrastructure that are to be used in governmental activities) are purchased or constructed, the cost of those assets is reported as expenditures in governmental funds. However, the Statement of Net Position included those capital assets among the assets of the District as a whole.

Land and improvements	\$ 3,513,622
Construction in progress	196,312
Infrastructure	2,977,105
Improvements	1,689,994
Less: accumulated depreciation	 (2,995,424)
Total	\$ 5,381,609

Deferred outflows of resources

When a bond refinancing occurs, the excess of new borrowings over the amount needed to retire the old bond series is reflected as another debt service cost at the fund level. At the government wide level, this amount is recognized as a deferred outflow of resources and amortized over the amortization period of the new debt. Deferred outflows of resources applicable to the District's governmental activities are not current financial resources and therefore, are not reported as assets in the governmental funds.

Deferred amount on refunding, net \$ 501,263

Long-term debt transactions

Governmental Activities long-term liabilities are not due and payable in the current period and are not reported as fund liabilities. All liabilities (both current and long-term) are reported in the Statement of Net Position. Balances at September 30, 2018 were:

Bonds payable \$ (4,762,973)

Accrued interest

Accrued liabilities in the Statement of Net Position differ from the amount reported in governmental funds due to the accrued interest on bonds.

Accrued interest \$ (66,483)

NOTE B - RECONCILIATION OF GOVERNMENT-WIDE AND FUND FINANCIAL STATEMENTS (CONTINUED)

2. Explanation of Differences Between the Governmental Fund Operating Statements and the Statement of Activities

The "net change in fund balances" for government funds, \$45,956, differs from the "change in net position" for governmental activities, \$149,756, reported in the Statement of Activities. The differences arise primarily from the long-term economic focus of the Statement of Activities versus the current financial resources focus of the governmental funds. The effect of the differences is illustrated below.

Capital related items

When capital assets that are to be used in governmental activities are purchased or constructed, the resources expended for those assets are reported as expenditures in governmental funds. However, in the Statement of Activities, the costs of those assets is allocated over their estimated useful lives and reported as depreciation. As a result, fund balances decrease by the amount of financial resources expended, whereas net position decrease by the amount of depreciation charged for the year.

Depreciation	\$ (209,025)
Capital outlay	 143,469
Net Change in Capital Related Items	\$ (65,556)

Deferred outflows of resources

Amortization of deferred outflows of resources does not require the use of current resources and therefore, are not reported as expenditures in the government funds.

Amortization of deferred amount on refunding	g	\$ (<u>'34,</u>	<u> 176</u>)

Long-term debt transactions

Repayments of bond principal are reported as expenditures in the governmental funds and, thus, have the effect of reducing fund balance because current financial resources have been used.

Bond principal payments	\$ 4,390,000
Proceeds from issuance of long-term debt	(4,313,785)
Total	\$ 76,215

NOTE B - RECONCILIATION OF GOVERNMENT-WIDE AND FUND FINANCIAL STATEMENTS (CONTINUED)

2. Explanation of Differences Between the Governmental Fund Operating Statements and the Statement of Activities (Continued)

Long-term debt transactions (Continued)

Some expenses reported in the Statement of Activities do not require the use of current financial resources, therefore, are not reported as expenditures in governmental funds.

Decrease in accrued interest payable	<u>\$</u>	21,608
Deferred amount on refunding	\$	105,709

NOTE C - CASH AND INVESTMENTS

All deposits are held in qualified public depositories and are included on the accompanying balance sheet as cash and investments.

Custodial Credit Risk – Deposits

Custodial credit risk is the risk that in the event of a bank failure, the District's deposits may not be returned to it. The District does not have a formal deposit policy for custodial credit risk; however, they follow the provisions of Chapter 280, Florida Statutes regarding deposits and investments. As of September 30, 2018, the District's bank balance was \$257,321 and the carrying value was \$254,780. Exposure to custodial credit risk was as follows. The District maintains all deposits in a qualified public depository in accordance with the provisions of Chapter 280, Florida Statutes, which means that all deposits are fully insured by Federal Depositors Insurance or collateralized under Chapter 280, Florida Statutes.

As of September 30, 2018, the District had the following investments and maturities:

Investment	Maturities	Fa	ir Value
First American Govt Obligation Fd	26 days*	\$	36,593

^{*} Weighted Average Maturity

NOTE C - CASH AND INVESTMENTS (CONTINUED)

<u>Custodial Credit Risk – Deposits</u> (Continued)

The District categorizes its fair value measurements within the fair value hierarchy recently established by generally accepted accounting principles. The fair value is the price that would be received to sell an asset, or paid to transfer a liability, in an orderly transaction between market participants at the measurement date. The hierarchy is based on the valuation inputs used to measure the fair value of the asset. The District uses a market approach in measuring fair value that uses prices and other relevant information generated by market transactions involving identical or similar assets, liabilities, or groups of assets and liabilities.

Assets or liabilities are classified into one of three levels. Level 1 is the most reliable and is based on quoted price for identical assets, or liabilities, in an active market. Level 2 uses significant other observable inputs when obtaining quoted prices for identical or similar assets, or liabilities, in markets that are not active. Level 3 is the least reliable and uses significant unobservable inputs that use the best information available under the circumstances, which includes the District's own data in measuring unobservable inputs.

Based on the criteria in the preceding paragraph, the investments in First American Government Obligation Fd is a Level 1 asset.

Credit Risk

The District's investments in government obligations are limited by state statutory requirements and bond compliance. The District has no investment policy that would further limit its investment choices. As of September 30, 2018, the District's investments in First American Government Obligation CI Y was rated AAAm by Standard & Poor's.

Interest Rate Risk

The District does not have a formal investment policy that limits investment maturities as a means of managing its exposure to fair value losses arising from increasing interest rates.

Concentration of Credit Risk

The District places no limit on the amount it may invest in any one fund. The investment in First American Government Obligation Fd is 100% of the District's total investments.

The types of deposits and investments and their level of risk exposure as of September 30, 2018 were typical of these items during the fiscal year then ended. The District considers any decline in fair value for certain investments to be temporary.

NOTE D - CAPITAL ASSETS

Capital Asset activity for the year ended September 30, 2018 was as follows:

	October 1, 2017	Additions	Deletions	September 30, 2018
Governmental activities:				
Capital assets, not being depreciated:				
Construction in progress	\$ 52,843	\$ 143,469	\$ -	\$ 196,312
Land and improvements	3,513,622			3,513,622
Total Capital Assets, Not Depreciated	3,566,465	143,469		3,709,934
Capital assets, being depreciated:				
Infrastructure	2,977,105	-	-	2,977,105
Improvements	1,689,994			1,689,994
Total Capital Assets, Depreciated	4,667,099			4,667,099
Less accumulated depreciation for:				
Infrastructure	(1,627,375)	(119,951)	-	(1,747,326)
Improvements	(1,159,024)	(89,074)		(1,248,098)
Total Accumulated Depreciation	(2,786,399)	(209,025)	_	(2,995,424)
Total Capital Assets Depreciated, Net	1,880,700	(209,025)		1,671,675
Governmental Activities Capital Assets	\$ 5,447,165	\$ (65,556)	\$ -	\$ 5,381,609

Current year depreciation of \$209,025 was charged to physical environment.

NOTE E – LONG-TERM DEBT

The following is a summary of activity in the bonds payable for the year ended September 30, 2018:

Long-term Debt at October 1, 2017	\$ 4,839,188
Issuance of long-term debt Principal payments	 4,313,785 (4,390,000)
Long-term Debt at September 30, 2018	\$ 4,762,973

NOTE E - LONG-TERM DEBT (CONTINUED)

Long-term debt is comprised of the following:

Special Assessment Revenue Refunding Note, Series 2017A-1

\$562,973 Series 2017A-1 Special Assessment Refunding Note due in annual principal installments beginning May 2019, maturing May 2033. Interest at a rate of 3.35% is due May 1 and November 1, beginning May 2018. Current portion is \$29,501.

\$ 562,973

Special Assessment Revenue Refunding Note, Series 2017A-2

\$4,200,000 Series 2017A-2 Special Assessment Refunding Note due in annual principal installments beginning May 2019, maturing May 2033. Interest at a rate of 3.35% is due May 1 and November 1, beginning May 2018. Current portion is \$220,086.

4,200,000

Total Long-term Debt at September 30, 2018

\$ 4,762,973

The annual requirements to amortize the principal and interest of bonded debt outstanding as of September 30, 2018 are as follows:

Principal		Interest		Total
\$ 249,587	\$	159,560	\$	409,147
257,948		151,198		409,146
266,589		142,557		409,146
275,520		133,626		409,146
284,750		124,397		409,147
1,573,389		472,342		2,045,731
1,855,190		190,541		2,045,731
\$ 4,762,973	\$	1,374,221	\$	6,137,194
\$	\$ 249,587 257,948 266,589 275,520 284,750 1,573,389 1,855,190	\$ 249,587 \$ 257,948 266,589 275,520 284,750 1,573,389 1,855,190	\$ 249,587 \$ 159,560 257,948 151,198 266,589 142,557 275,520 133,626 284,750 124,397 1,573,389 472,342 1,855,190 190,541	\$ 249,587 \$ 159,560 \$ 257,948 151,198 266,589 142,557 275,520 133,626 284,750 124,397 1,573,389 472,342 1,855,190 190,541

NOTE E - LONG-TERM DEBT (CONTINUED)

Significant Bond Resolution Terms and Covenants

The Series 2017 A-1 and Series 2017A-2 Notes are subject to redemption at the option of the District prior to maturity as a whole or in part, at any time in the manner provided by the Trust Indenture. The Series 2017A-1 and Series 2017A-2 Notes are subject to extraordinary mandatory redemption prior to maturity in the manner determined by the Bond Registrar if certain events occur as outlined in the Trust Indenture.

Depository Funds

The Trust Indenture establishes certain funds and determines the order in which revenues are to be deposited into these funds.

The following is a schedule of required reserve deposits as of September 30, 2018:

	R	Reserve		Reserve
	Е	Balance	Re	equirement
Series 2017 Special Assessment Bonds	\$	36,593	\$	32,500

In February 2018, the District issued \$4,200,000 Special Assessment Revenue Refunding Note, Series 2017A-2 and \$113,785 Special Assessment Revenue Refunding Noted, Series 2017A-1, which retired the Series 2007 bonds. The current refunding of the Series 2007 bonds resulted in a deferred amount on refunding of \$105,709. As a result of the transaction, the District decreases its aggregate debt payment for Series 2017A-1/A-2 Bonds by \$707,340 over the next 15 years and realized an economic gain of approximately \$556,154.

NOTE F - INTERFUND BALANCES

Interfund balances at September 30, 2018, consisted of the following:

	Due From		
Due To	General Fund		
Debt Service Fund	\$	179,545	

Interfund balances between the General Fund and the Debt Service Fund is related to the receipt of tax assessments by the General Fund on behalf of the Debt Service Fund.

	Transfer In		
Transfer Out	Gei	neral Fund	
Debt Service Fund	\$	132,411	

Interfund activity between the General Fund and the Debt Service Fund are due to moving Series 2017 bond refinance transactions to the correct accounts.

NOTE G - RISK MANAGEMENT

The District is exposed to various risks of loss related to torts; theft of, damage to and destruction of assets; errors and omissions; and natural disasters for which the government carries commercial insurance. Settled claims from these risks have not exceeded commercial insurance coverage over the past three years.



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INDEPENDENT AUDITOR'S REPORT 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

To the Board of Supervisors Laguna Lakes Community Development District Lee County, FL

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 statements of Laguna Lakes Community Development District, as of and for the year ended September 30, 2018, and the related notes to the financial statements, and have issued our report thereon dated July 9, 2019.

Internal Control Over Financial Reporting

In planning and performing our audit, we considered Laguna Lakes Community Development District's internal control over financial reporting to determine the audit procedures that are appropriate in the circumstances for the purpose of expressing our opinions on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of Laguna Lakes Community Development District's internal control. Accordingly, we do not express an opinion on the effectiveness of Laguna Lakes Community Development District's internal control over financial reporting.

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 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 over financial reporting 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. Given these limitations, during our audit we did not identify any deficiencies in internal control that we consider to be material weaknesses. However, material weaknesses may exist that have not been identified.



To the Board of Supervisors Laguna Lakes Community Development District

Compliance and Other Matters

As part of obtaining reasonable assurance about whether Laguna Lakes Community Development District's financial statements are free of 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*.

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.

Berger, Toombs, Elam, Gaines & Frank Certified Public Accountants

Fort Pierce, Florida

July 9, 2019

Certified Public Accountants PL

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MANAGEMENT LETTER

To the Board of Supervisors Laguna Lakes Community Development District Lee County, Florida

Report on the Financial Statements

We have audited the financial statements of the Laguna Lakes Community Development District as of and for the year ended September 30, 2018, and have issued our report thereon dated July 9, 2019.

Auditor's Responsibility

We conducted our audit in accordance with auditing standards generally accepted in the United States; the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States and Chapter 10.550, Rules of the Florida Auditor General.

Other Reporting Requirements

We have issued our Independent Auditor's Report 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* and our Independent Auditor's Report on an examination conducted in accordance with *AICPA Professionals Standards*, AT-C Section 315, regarding compliance requirements in accordance with Chapter 10.550, Rules of the Auditor General. Disclosures in those reports, which are dated July 9, 2019, should be considered in conjunction with this management letter.

Prior Audit Findings

Section 10.554(1)(i)1., Rules of the Auditor General, requires that we determine whether or not corrective actions have been taken to address findings and recommendations made in the preceding financial audit report. There following findings or recommendations were made in the preceding audit.

2017-01 Omission of Debt Service Fund:

Observation: At the time the trial balance was provided for the audit it did not include balances related to the issuance of the Series 2017A-1 Note. As a result, the financial statements would have been materially misstated given the significance of the balances. The omission appears to have been caused by a lack of communication between District management and the outsourced bookkeeping firm and a lack of awareness of the requirement to record the Note issuance in the District's records.



To the Board of Supervisors
Laguna Lakes Community Development District

Recommendation: We recommend that all required transactions be recorded in the District's books.

Management Response: This has been corrected and a new trial balance submitted to the Auditor. All transactions have now been recorded in the Districts books.

Current Status: This was corrected in the current year.

2017-02 Budget

Observation: Actual expenditures exceeded appropriations in the general fund for the fiscal year ended September 30, 2017.

Recommendation: The District should amend the budget during the fiscal year or within statutory guidelines to ensure that all expenditures are properly budgeted.

Management Response: Acknowledged and end of year budget will be amended going forward. All overages were approved by the Board and recorded in the minutes but Manager recognizes need to amend budget when these situations occur.

Current Status: This situation was corrected in the current year and there was no budget over expenditure.

2017-03 Statute Compliance

Observation: Florida Statutes require governmental entities to file an annual financial report and a copy of the financial audit with the State within 9 months of the end of the fiscal year. Both the annual financial report and the annual audit report for the fiscal year ended September 30, 2017 were not filed by June 30, 2018.

Recommendation: We recommend that the District take the necessary steps to comply with the Florida Statutes and file both reports within the statutory time frames.

Management Response: Management will respond but is limited by timeliness of audit being submitted by Auditor. All reports are filed within two weeks of receipt of Audit but this is one where the debt service issue caused the delay and was not a delay by audit team

Current Status: The report was not filed by June 30, 2019.

Financial Condition and Management

Section 10.554(1)(i)5.a. and 10.556(7), Rules of the Auditor General, require us to apply appropriate procedures and communicate the results of our determination as to whether or not Laguna Lakes Community Development District has met one or more of the conditions described in Section 218.503(1), Florida Statutes, and to identify the specific conditions met. In connection with our audit, we determined that Laguna Lakes Community Development District did not meet any of the conditions described in Section 218.503(1) Florida Statutes.



To the Board of Supervisors
Laguna Lakes Community Development District

Pursuant to Sections 10.554(1)(i)5.c. and 10.556(8), Rules of the Auditor General, we applied financial condition assessment procedures for Laguna Lakes Community Development District. It is management's responsibility to monitor the Laguna Lakes Community Development District's financial condition; our financial condition assessment was based in part on the representations made by management and the review of the financial information provided by the same as of September 30, 2018.

Section 10.554(1)(i)2., Rules of the Auditor General, requires that we communicate any recommendations to improve financial management. In connection with our audit, we did not have any such recommendations.

Additional Matters

Section 10.554(1)(i)3., Rules of the Auditor General, requires us to communicate noncompliance with provisions of contracts or grant agreements, or abuse, that have occurred, or are likely to have occurred, that have an effect on the financial statements that is less than material but warrants the attention of those charged with governance. In connection with our audit, we did not note any such findings.

Purpose of this Letter

Our management letter is intended solely for the information and use of the Legislative Auditing Committee, members of the Florida Senate and the Florida House of Representatives, the Florida Auditor General, Federal and other granting agencies, the Board of Supervisors, and applicable management, and is not intended to be and should not be used by anyone other than these specified parties.

Berger, Toombs, Elam, Gaines & Frank Certified Public Accountants PL

Berger Joones Glam Daines + Frank

Fort Pierce, Florida

July 9, 2019

Certified Public Accountants

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INDEPENDENT ACCOUNTANT'S REPORT/COMPLIANCE WITH SECTION 218.415, FLORIDA STATUTES

To the Board of Supervisors Laguna Lakes Community Development District Lee County, FL

We have examined Laguna Lakes Community Development District's compliance with Section 218.415, Florida Statutes during the year ended September 30, 2018. Management is responsible for Laguna Lakes Community Development District's compliance with those requirements. Our responsibility is to express an opinion on Laguna Lakes Community Development District's compliance based on our examination.

Our examination was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants and, accordingly, included examining, on a test basis, evidence about Laguna Lakes Community Development District's compliance with those requirements and performing such other procedures as we considered necessary in the circumstances. We believe that our examination provides a reasonable basis for our opinion. Our examination does not provide a legal determination on Laguna Lakes Community Development District's compliance with the specified requirements.

In our opinion, Laguna Lakes Community Development District complied, in all material respects, with the aforementioned requirements during the year ended September 30, 2018.

Berger, Toombs, Elam, Gaines & Frank

Certified Public Accountants PL

Derger Joonsbor Glam (Daines) + Frank

Fort Pierce, Florida

July 9, 2019