

JUST DETENTION INTERNATIONAL

FINANCIAL STATEMENTS

JUNE 30, 2015

JUST DETENTION INTERNATIONAL

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INDEPENDENT AUDITORS' REPORT

Board of Directors
Just Detention International
3325 Wilshire Boulevard, Suite 340
Los Angeles, California 90010

Members of the Board:

Report on the Financial Statements

We have audited the accompanying financial statements of Just Detention International (a nonprofit organization), which comprise the statement of financial position as of June 30, 2015, and the related statements of activities, functional expenses, and cash flows for the year then ended, and the related notes to the financial statements.

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 Auditing 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.

Mannon Kaplan, CPA
George Nadel Rivin, CPA
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Stephen Ozen, CPA
Justine Grant Ruffalo, CPA

Stanley L. Miller, CPA (1921-95)

Paul Arase, CPA (1921-2015)

Los Angeles

4123 Lankershim Boulevard
North Hollywood, CA 91602
Tel: 818.769.2010

San Francisco

44 Montgomery Street
Suite 3701
San Francisco, CA 94104
Tel: 415.956.3600

Seattle

600 Stewart Street
Suite 618
Seattle, WA 98101
Tel: 206.596.3930

Portland

1200 NW Marshall Street
Suite 812
Portland, OR 97209
Tel: 971.255.0546

Las Vegas

330 East Warm Springs Road
Las Vegas, NV 89119
Tel: 702.315.4213

Opinion

In our opinion, the financial statements referred to above present fairly, in all material respects, the financial position of Just Detention International as of June 30, 2015, and the changes in its net assets and its cash flows for the year then ended in accordance with accounting principles generally accepted in the United States of America.

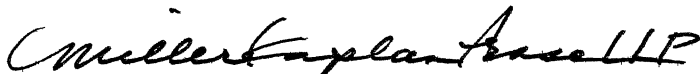
Other Matters

Other Information

Our audit was conducted for the purpose of forming an opinion on the financial statements as a whole. The accompanying schedule of expenditures of federal awards, as required by Office of Management and Budget Circular A-133, *Audits of States, Local Governments, and Non-Profit Organizations*, is presented for purposes of additional analysis and is not a required part of the financial statements. Such information is the responsibility of management and was derived from and relates directly to the underlying accounting and other records used to prepare the financial statements. The information has been subjected to the auditing procedures applied in the audit of the financial statements and certain additional procedures, including comparing and reconciling such information directly to the underlying accounting and other records used to prepare the financial statements or to the financial statements themselves, and other additional procedures in accordance with auditing standards generally accepted in the United States of America. In our opinion, the information is fairly stated, in all material respects, in relation to the financial statements as a whole.

Other Reporting Required by *Government Auditing Standards*

In accordance with *Government Auditing Standards*, we have also issued our report dated November 20, 2015, on our consideration of Just Detention International's internal control over financial reporting and on our tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements and other matters. 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 Just Detention International's internal control over financial reporting and compliance.



MILLER KAPLAN ARASE LLP

North Hollywood, California

November 20, 2015

JUST DETENTION INTERNATIONAL
STATEMENT OF FINANCIAL POSITION
JUNE 30, 2015

ASSETSCurrent Assets

Cash and Cash Equivalents	\$ 763,827
Investments	259,509
Accounts Receivable	272,548
Contributions Receivable, Current Portion	<u>517,237</u>

TOTAL CURRENT ASSETS 1,813,121

Other Assets

Property and Equipment, Net	7,822
Deposits	8,311
Prepaid Expenses	18,380
Contributions Receivable, Less Current Portion	<u>325,000</u>

TOTAL ASSETS \$ 2,172,634

LIABILITIES AND NET ASSETSCurrent Liabilities

Deferred Rent	\$ 5,610
Accounts Payable and Accrued Expenses	<u>96,251</u>

TOTAL CURRENT LIABILITIES 101,861

NET ASSETS

Unrestricted	1,137,536
Temporarily Restricted (Note 7)	<u>933,237</u>

TOTAL NET ASSETS 2,070,773

TOTAL LIABILITIES AND NET ASSETS \$ 2,172,634

JUST DETENTION INTERNATIONAL
STATEMENT OF ACTIVITIES
JULY 1, 2014 TO JUNE 30, 2015

	<u>Unrestricted</u>	<u>Temporarily Restricted</u>	<u>Total</u>
<u>REVENUE AND SUPPORT</u>			
Contributions	\$ 521,082	\$ 1,114,553	\$ 1,635,635
Government Grants	1,242,355	-	1,242,355
Interest and Other Income	22,874	-	22,874
	<u>1,786,311</u>	<u>1,114,553</u>	<u>2,900,864</u>
<u>TOTAL REVENUE AND SUPPORT</u>			
Net Assets Released from Restrictions	454,458	(454,458)	-
	<u>2,240,769</u>	<u>660,095</u>	<u>2,900,864</u>
<u>EXPENSES</u>			
Program Services	1,681,333	-	1,681,333
Administration	142,768	-	142,768
Fundraising	109,515	-	109,515
	<u>1,933,616</u>	<u>-</u>	<u>1,933,616</u>
<u>TOTAL EXPENSES</u>			
<u>CHANGE IN NET ASSETS</u>	307,153	660,095	967,248
<u>NET ASSETS</u>			
BEGINNING OF THE YEAR	<u>830,383</u>	<u>273,142</u>	<u>1,103,525</u>
END OF THE YEAR	<u>\$ 1,137,536</u>	<u>\$ 933,237</u>	<u>\$ 2,070,773</u>

JUST DETENTION INTERNATIONAL
STATEMENT OF FUNCTIONAL EXPENSES
JULY 1, 2014 TO JUNE 30, 2015

	<u>Program Services</u>	<u>Administration</u>	<u>Fundraising</u>	<u>Total</u>
Salaries	\$ 971,549	\$ 66,242	\$ 66,242	\$ 1,104,033
Payroll Taxes	70,995	4,840	4,840	80,675
Employee Benefits	146,068	9,959	9,959	165,986
Professional Fees	-	41,944	4,660	46,604
Consultants	191,558	-	-	191,558
Website	5,833	-	648	6,481
Technical Support	6,336	432	432	7,200
Insurance	4,141	282	282	4,705
Permits and Licenses	-	876	-	876
Office Supplies	18,641	1,271	1,271	21,183
Telephone and Internet	13,327	909	909	15,145
Postage and Delivery	11,109	757	757	12,623
Rent	96,897	6,606	6,606	110,109
Printing and Publications	23,592	-	2,621	26,213
Travel	88,723	-	9,858	98,581
Survivor Outreach and Training	2,721	-	-	2,721
Dues and Subscriptions	1,279	-	-	1,279
Equipment Leases	1,826	124	124	2,074
Staff and Board Development	12,331	8,220	-	20,551
Depreciation	4,496	306	306	5,108
Online Communications	9,911	-	-	9,911
<u>TOTAL FUNCTIONAL EXPENSES</u>	<u>\$ 1,681,333</u>	<u>\$ 142,768</u>	<u>\$ 109,515</u>	<u>\$ 1,933,616</u>

JUST DETENTION INTERNATIONAL
STATEMENT OF CASH FLOWS
JULY 1, 2014 TO JUNE 30, 2015

CASH FLOWS FROM OPERATING ACTIVITIES

Change in Net Assets	\$ 967,248
Adjustments to Reconcile Change in Net Assets to Net Cash by Operating Activities:	
Depreciation	5,108
Changes in Operating Assets and Liabilities:	
(Increase) Decrease in Assets:	
Accounts Receivable	39,983
Contributions Receivable	(652,237)
Prepaid Expenses	340
Accounts Payable and Accrued Expenses	16,565
	<u>377,007</u>
<u>NET CASH PROVIDED BY OPERATING ACTIVITIES</u>	<u>377,007</u>

CASH FLOWS FROM INVESTING ACTIVITIES

Sale of Investments	259,209
Purchase of Investments	<u>(259,509)</u>
	<u>(300)</u>
<u>NET CASH (USED) BY INVESTING ACTIVITIES</u>	<u>(300)</u>

NET INCREASE IN CASH AND CASH EQUIVALENTS 376,707

CASH AND CASH EQUIVALENTS - BEGINNING OF THE YEAR 387,120

CASH AND CASH EQUIVALENTS - END OF THE YEAR \$ 763,827

JUST DETENTION INTERNATIONAL
NOTES TO FINANCIAL STATEMENTS
JUNE 30, 2015

NOTE 1 - DESCRIPTION OF THE ORGANIZATION

An international health and human rights organization, Just Detention International (“JDI” or the “Organization”) works to put an end to sexual violence against men, women, and youth in all forms of detention. To achieve this goal, JDI seeks to: engender policies that ensure government accountability for prisoner rape; change ill-informed and flippant public attitudes toward sexual assault behind bars; and promote access to resources for survivors of this type of violence. The Organization’s primary sources of revenue are contributions from individuals and foundations and government grants.

NOTE 2 - SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

A. Basis of Accounting

The Organization’s financial statements are prepared on the accrual basis of accounting in accordance with accounting principles generally accepted in the United States of America (GAAP).

B. Property and Equipment

Property and equipment are recorded at cost if purchased, or fair value on the date of donation. Property and equipment purchases over \$1,000 are capitalized. They are depreciated using the straight line method over the estimated useful lives of the assets. Estimated useful lives range from three to five years.

C. Grants and Contributions

Grants and contributions are recognized when the donor makes a promise to give to the Organization that is, in substance, unconditional. Grants and contributions that are restricted by the donor are reported as increases in temporarily or permanently restricted net assets depending on the nature of the restrictions. When a restriction expires, temporarily restricted net assets are reclassified to unrestricted net assets. Temporarily restricted net assets are restricted for use in specific periods or programs of the Organization. There were no permanently restricted net assets as of June 30, 2015.

Reimbursements for project costs under government grants are recognized when costs are incurred in accordance with the applicable grant agreements. JDI submits funding requests to the cognizant agency(ies) monthly or quarterly, based upon its expenditures under the grants. As of June 30, 2015, accounts receivable of \$272,548 are reimbursements due under government grants for costs incurred before year end. There is no allowance for doubtful accounts.

D. Estimates

The preparation of financial statements in conformity with accounting principles generally accepted in the United States of America requires management to make estimates and assumptions that affect certain reported amounts and disclosures. Accordingly, actual results could differ from those estimates.

E. Tax-Exempt Status

The Organization is a non-profit corporation organized under the laws of the State of New York and recognized as a non-profit organization by California and Washington, D.C. The

JUST DETENTION INTERNATIONAL
NOTES TO FINANCIAL STATEMENTS
JUNE 30, 2015

NOTE 2 - SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (Continued)

E. Tax-Exempt Status (Continued)

Organization is exempt from federal income tax under Section 501(c)(3) of the Internal Revenue Code, and exempt from state franchise or income tax under Section 23701d of the California Revenue and Taxation Code. Accordingly, no provisions for income taxes or related credits are included in the accompanying financial statements.

The Organization has adopted guidance on accounting for uncertainty in income taxes issued by the Financial Accounting Standards Board. Management believes that the Organization has taken no uncertain tax positions that require adjustment to the financial statements to comply with the provisions of this guidance. The Organization files information returns annually. As of June 30, 2015, federal information returns for years ending after June 30, 2011 are subject to examination by authorities.

F. Contributions Receivable

Contributions receivable are estimated based on contributions promised on or before June 30, for which payment had not yet been received. No allowance is provided for uncollectible accounts.

Contributions receivable as of June 30, 2015, includes \$517,237 due within one year and \$325,000 due in one to five years. Contributions expected to be collected after one year, have not been discounted as the discount is not material to the financial statements.

G. Cash and Cash Equivalents

Cash and cash equivalents consist of cash on hand and in banks and money market funds in banks and brokerage accounts.

H. Investment Valuation

GAAP establishes a fair value hierarchy that prioritizes valuation inputs into three levels based on the extent to which inputs used in measuring fair value are observable in the market.

Level 1 – Inputs are quoted prices in an active market.

Level 2 – Inputs are quoted prices for similar instruments and model based valuation techniques for which all significant assumptions are observable in the market or can be corroborated by observable market data.

Level 3 – Inputs are generally unobservable and typically reflect management's estimates of assumptions that market participants would use in pricing the asset or liability.

The Organization's investment comprises a twelve-month certificate of deposit valued at its cost plus accrued interest. Management believes that cost plus accrued interest approximates fair value; therefore, the certificate of deposit is considered a Level 3 investment.

The following table reconciles the beginning and ending fair value of the Organization's Level 3 investments:

JUST DETENTION INTERNATIONAL
NOTES TO FINANCIAL STATEMENTS
JUNE 30, 2015

NOTE 2 - SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (Continued)

H. Investment Valuation (Continued)

Balance, June 30, 2014	\$ 259,209
Purchases	259,509
Sales	<u>(259,209)</u>
Balance, June 30, 2015	<u>\$ 259,509</u>

NOTE 3 - PROPERTY AND EQUIPMENT

Property and equipment are reported at cost and are depreciated over their estimated useful lives of three to five years using the straight line method. Individual property and equipment acquisitions exceeding a cost of \$1,000 are capitalized. At June 30, 2015 property and equipment consisted of the following:

Office Equipment	\$ 36,597
Leasehold Improvements	2,064
Less: Accumulated Depreciation	<u>(30,839)</u>
	<u>\$ 7,822</u>

NOTE 4 - COMMITMENTS AND CONTINGENCIES

JDI leases office space in Los Angeles and Washington D.C. under lease agreements expiring through 2016. Rent paid under the leases totaled \$110,109 for the year ended June 30, 2015. JDI received three months free rent under its Washington D.C. lease, which has been recorded as deferred rent to be amortized over the life of the lease. Future minimum lease payments are as follows:

<u>Year Ending:</u>	<u>Total</u>
June 30, 2016	\$ 98,201
June 30, 2017	67,192
June 30, 2018	<u>5,611</u>
	<u>\$ 171,004</u>

NOTE 5 - RETIREMENT PLAN CONTRIBUTIONS

JDI has established a defined contribution retirement plan for the benefit of its employees. All employees are eligible to participate after six months of service. JDI contributes 7% of each participant's compensation to the plan. Contributions to the plan totaled \$68,674 for the year ended June 30, 2015.

NOTE 6 - CONCENTRATION OF CREDIT RISK

The Organization maintains cash and investment accounts at several banks and brokerage firms. Cash balances are insured by the Federal Deposit Insurance Corporation up to \$250,000 per bank. In addition, at June 30, 2015, JDI maintained a cash account with a balance of \$1,251, at First National Bank, a division of First Rand Bank Limited of South Africa, which is not covered by deposit insurance. JDI has not experienced any losses in such accounts and believes it is not exposed to significant credit risk as to cash. At June 30, 2015, uninsured balances totaled approximately \$530,000.

JUST DETENTION INTERNATIONAL
NOTES TO FINANCIAL STATEMENTS
JUNE 30, 2015

NOTE 7 - NET ASSETS

Net assets as of June 30, 2015 were temporarily restricted for the following:

Future Periods	\$ 625,000
Policy Watch	20,000
South Africa Program	218,237
Narrowing the Pipeline	35,000
California Survivor Outreach	5,000
LGBT Working Group	<u>30,000</u>
<u>TOTAL</u>	<u>\$ 933,237</u>

NOTE 8 - SUBSEQUENT EVENTS

Management has evaluated subsequent events through November 20, 2015, the date the financial statements were available to be issued. There were no subsequent events that required recognition or additional disclosures in these financial statements.

JUST DETENTION INTERNATIONAL
SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS
JULY 1, 2014 TO JUNE 30, 2015

Federal Grantor/Pass-Through Grantor/Program or Cluster Title	Federal CFDA Number	Pass-Through Entity Identifying Number	Federal Expenditures
<u>U.S. Department of Justice</u>			
Office for Victims of Crime	16.582	N/A	\$ 95,236
CalOES - Governor's Office of Emergency Services	16.588	AP14-01-8671	110,944 *
Office on Violence Against Women	16.526	N/A	309,286 *
<u>Bureau of Justice Assistance</u>			
PREA Resource Center - Barnwell County Detention Center		N/A	18,551
PREA Resource Center - County of Kern, California	16.735	227-2013	793
Colorado Department of Public Safety	16.735	12-RP-01-2-1	28,339
Clallam County, Washington	16.735	F12-34025-001	58,713
NY State Office of Children and Family Services	16.735	C026876	29,824
New Mexico Department of Public Safety	16.735	12-PREA-BERNCO-SFY13	78,957
Los Angeles Police Department	16.735	C-123208	97,283
PREA Resource Center - Douglas County	16.735	N/A	9,715
PREA Resource Center - County of Trinity	16.735	N/A	1,059
National Council on Crime and Delinquency - C&SO	16.735	PRC-043	3,921
The Moss Group	16.735	N/A	113,292 *
South Carolina Department of Corrections	16.735	5400006906	126,712 *
Commonwealth of Virginia Department of Corrections	16.735	DOC-15-053	72,828
West Virginia Region Jail and Correctional Facility Authority	16.735	2014-RP-BX-0014	52,659
County of Los Angeles - Los Angeles Sherriff's Department	16.735	78370	9,686
New York State Department of Corrections and Community Supervision	16.735	T161338	5,826
Los Angeles County Probation Department	16.735	POTR-PB-15341488-1	18,731
Total U.S. Department of Justice			726,889
TOTAL FEDERAL AWARDS			\$ 1,242,355

* Denotes a major program.

JUST DETENTION INTERNATIONAL
NOTES TO SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS
FOR THE YEAR ENDED JUNE 30, 2015

NOTE 1 - BASIS OF ACCOUNTING

The accompanying schedule of expenditures of federal awards includes the federal grant activity of Just Detention International and is presented on the accrual basis of accounting. The information in this schedule is presented in accordance with the requirements of OMB Circular A-133, *Audits of States, Local Governments, and Non-Profit Organizations*. Therefore, some amounts presented in this schedule may differ from amounts presented in, or used in the preparation of, the basic financial statements.

INDEPENDENT AUDITORS' 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

Board of Directors
Just Detention International
3325 Wilshire Boulevard, Suite 340
Los Angeles, California 90010

Members of the Board:

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 Just Detention International (a nonprofit organization), which comprise the statement of financial position as of June 30, 2015, and the related statements of activities, functional expenses, and cash flows for the year then ended, and the related notes to the financial statements, and have issued our report thereon dated November 20, 2015.

Internal Control Over Financial Reporting

In planning and performing our audit of the financial statements, we considered Just Detention International's internal control over financial reporting (internal control) to determine the audit procedures that are appropriate in the circumstances for the purpose of expressing our opinion on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of Just Detention International's internal control. Accordingly, we do not express an opinion on the effectiveness of the Organization's internal control.

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

Our consideration of internal control was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control that might be material weaknesses or significant deficiencies. 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.

Mannon Kaplan, CPA
George Nadel Rivin, CPA
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Compliance and Other Matters

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

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 organization'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 organization's internal control and compliance. Accordingly, this communication is not suitable for any other purpose.



MILLER KAPLAN ARASE LLP

North Hollywood, California

November 20, 2015

INDEPENDENT AUDITORS' REPORT ON COMPLIANCE FOR
EACH MAJOR PROGRAM AND ON INTERNAL CONTROL
OVER COMPLIANCE REQUIRED BY OMB CIRCULAR A-133

Board of Directors
Just Detention International
3325 Wilshire Boulevard, Suite 340
Los Angeles, California 90010

Members of the Board:

Report on Compliance for Each Major Federal Program

We have audited Just Detention International's compliance with the types of compliance requirements described in the *OMB Circular A-133 Compliance Supplement* that could have a direct and material effect on each of Just Detention International's major federal programs for the year ended June 30, 2015. Just Detention International's major federal programs are identified in the summary of auditor's results section of the accompanying schedule of findings and questioned costs.

Management's Responsibility

Management is responsible for compliance with the requirements of laws, regulations, contracts, and grants applicable to its federal programs.

Auditor's Responsibility

Our responsibility is to express an opinion on compliance for each of Just Detention International's major federal programs based on our audit of the types of compliance requirements referred to above. We conducted our audit of compliance in accordance with auditing standards generally accepted in the United States of America; the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States; and OMB Circular A-133, *Audits of States, Local Governments, and Non-Profit Organizations*. Those standards and OMB Circular A-133 require that we plan and perform the audit to obtain reasonable assurance about whether noncompliance with the types of compliance requirements referred to above that could have a direct and material effect on a major federal program occurred. An audit includes examining, on a test basis, evidence about Just Detention International's compliance with those requirements and performing such other procedures as we considered necessary in the circumstances.

We believe that our audit provides a reasonable basis for our opinion on compliance for each major federal program. However, our audit does not provide a legal determination of Just Detention International's compliance.

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Justine Grant Ruffalo, CPA

Stanley L. Miller, CPA (1921-95)
Paul Arase, CPA (1921-2015)

Los Angeles
4123 Lankershim Boulevard
North Hollywood, CA 91602
Tel: 818.769.2010

San Francisco
44 Montgomery Street
Suite 3701
San Francisco, CA 94104
Tel: 415.956.3600

Seattle
600 Stewart Street
Suite 618
Seattle, WA 98101
Tel: 206.596.3930

Portland
1200 NW Marshall Street
Suite 812
Portland, OR 97209
Tel: 971.255.0546

Las Vegas
330 East Warm Springs Road
Las Vegas, NV 89119
Tel: 702.315.4213

Opinion on Each Major Federal Program

In our opinion, Just Detention International complied, in all material respects, with the types of compliance requirements referred to above that could have a direct and material effect on each of its major federal programs for the year ended June 30, 2015.

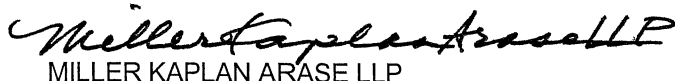
Report on Internal Control Over Compliance

Management of Just Detention International is responsible for establishing and maintaining effective internal control over compliance with the types of compliance requirements referred to above. In planning and performing our audit of compliance, we considered Just Detention International's internal control over compliance with the types of requirements that could have a direct and material effect on each major federal program to determine the auditing procedures that are appropriate in the circumstances for the purpose of expressing an opinion on compliance for each major federal program and to test and report on internal control over compliance in accordance with OMB Circular A-133, but not for the purpose of expressing an opinion on the effectiveness of internal control over compliance. Accordingly, we do not express an opinion on the effectiveness of Just Detention International's internal control over compliance.

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

Our consideration of internal control over compliance was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control over compliance that might be material weaknesses or significant deficiencies. We did not identify any deficiencies in internal control over compliance that we consider to be material weaknesses. However, material weaknesses may exist that have not been identified.

The purpose of this report on internal control over compliance is solely to describe the scope of our testing of internal control over compliance and the results of that testing based on the requirements of OMB Circular A-133. Accordingly, this report is not suitable for any other purpose.



MILLER KAPLAN ARASE LLP

North Hollywood, California

November 20, 2015

JUST DETENTION INTERNATIONAL
SCHEDULE OF FINDINGS AND QUESTIONED COSTS
FOR THE YEAR ENDED JUNE 30, 2015

SECTION I - SUMMARY OF AUDITORS' RESULTS

1. The auditors' report expresses an unmodified opinion on the financial statements of Just Detention International.
2. No significant deficiencies relating to the audit of the financial statements are reported in the Independent Auditors' 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*.
3. No instances of noncompliance material to the financial statements of Just Detention International were disclosed during the audit.
4. No significant deficiencies relating to the audit of major federal award programs are reported in the Independent Auditors' Report on Compliance for Each Major Program and on Internal Control Over Compliance Required by OMB Circular A-133.
5. The auditors' report on compliance for the major federal award programs of Just Detention International expresses an unmodified opinion.
6. There were no audit findings that are required to be reported in accordance with section 510(a) of OMB Circular A-133.
7. California Office of Emergency Services, Office on Violence Against Women, The Moss Group, and South Carolina Department of Corrections programs were tested as major programs.
8. The threshold for distinguishing Type A and B programs was \$300,000.
9. Just Detention International did not qualify as a low risk auditee.

SECTION II - FINDINGS - FINANCIAL STATEMENT AUDIT

None.

SECTION III - FINDINGS AND QUESTIONED COSTS MAJOR FEDERAL AWARD PROGRAMS AUDIT

None.