

COMPLIANCE AUDIT

City of Bethlehem Aggregate Pension Fund Northampton County, Pennsylvania For the Period January 1, 2012 to December 31, 2013

October 2014



Commonwealth of Pennsylvania
Department of the Auditor General

Eugene A. DePasquale • Auditor General



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**EUGENE A. DePASQUALE
AUDITOR GENERAL**

The Honorable Mayor and City Council
City of Bethlehem
Northampton County
Bethlehem, PA 18018

We have conducted a compliance audit of the City of Bethlehem Aggregate Pension Fund for the period January 1, 2012 to December 31, 2013. The audit was conducted pursuant to authority derived from Section 402(j) of Act 205 and in accordance with the standards applicable to performance audits contained in *Government Auditing Standards* issued by the Comptroller General of the United States. Those standards require that we plan and perform our audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

The objectives of the audit were:

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

Our audit was limited to the areas related to the objectives identified above. Our methodology addressed determinations about the following:

- Whether state aid was properly determined and deposited in accordance with Act 205 requirements.
- Whether employer contributions are determined and deposited in accordance with the plan's governing document and applicable laws and regulations.
- Whether employee contributions are required and, if so, are determined, deducted and deposited into the pension plans and are in accordance with the plan provisions and applicable laws and regulations.

- Whether benefit payments, if any, represent payments to all (and only) those entitled to receive them and are properly determined in accordance with applicable laws and regulations.
- Whether obligations for plan benefits are accurately determined in accordance with plan provisions and based on complete and accurate participant data; and whether actuarial valuation reports are prepared and submitted to the Public Employee Retirement Commission (PERC) in accordance with state law and selected information provided on these reports is accurate, complete and in accordance with plan provisions to ensure compliance for participation in the state aid program.
- Whether the special ad hoc postretirement adjustment granted to eligible pensioners is in accordance with applicable laws and regulations and whether the ad hoc reimbursement received by the municipality was treated in accordance with applicable laws and regulations.
- Whether the terms and methodologies of the issuance of bonds by the municipality, and any restrictions are in compliance with plan provisions and state regulations.
- Whether Deferred Retirement Option Plan (DROP) participants' benefit payments are properly determined in accordance with the provisions of the DROP and any other applicable laws and regulations.

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

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

The results of our tests indicated that, in all significant respects, the City of Bethlehem Aggregate Pension Fund was administered in compliance with applicable state laws, regulations, contracts, administrative procedures, and local ordinances and policies, except as noted in the following findings further discussed later in this report:

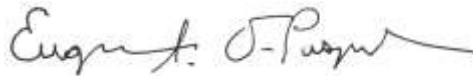
Finding No. 1 – Incorrect Data On Certification Form AG 385 Resulting In An Overpayment Of State Aid

Finding No. 2 – Incorrect Data Supplied To Actuary For Actuarial Valuation Report Preparation

The accompanying supplementary information is presented for purposes of additional analysis. We did not audit the information or conclude on it and, accordingly, express no form of assurance on it.

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

October 17, 2014



EUGENE A. DEPASQUALE
Auditor General

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BACKGROUND

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

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

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

- Act 147 - Special Ad Hoc Municipal Police and Firefighter Postretirement Adjustment Act, Act of December 14, 1988 (P.L. 1192, No. 147), as amended, 53 P.S. § 896.101 et seq.
- Act 399 - Optional Third Class City Charter Law, Act of July 15, 1957 (P.L. 901, No. 399), as amended, 53 P.S. § 41101 et seq.

The City of Bethlehem Aggregate Pension Fund serves as a common investment and administrative agent for the city's police, officers' and employees' and paid firemen's pension plans. The plans are single-employer defined benefit pension plans locally controlled by the provisions of the City's Codified Ordinances, at Articles 153, 155 and 151, respectively. The plans are also affected by the provisions of collective bargaining agreements between the city and its police officers, non-uniformed employees hired on or prior to August 1, 1978, and firefighters.

BACKGROUND – (Continued)

Police Pension Plan

The plan was established December 28, 1948. Active members are required to contribute 7 percent of compensation plus an additional \$1 per month to the plan. As of December 31, 2013, the plan had 138 active members, no terminated members eligible for vested benefits in the future and 170 retirees receiving pension benefits from the plan.

As of December 31, 2013, selected plan benefit provisions are as follows:

Eligibility Requirements:

Normal Retirement	20 years of service
Early Retirement	None
Vesting	None

Retirement Benefit:

Benefit equals 60% of average monthly compensation (final or average of highest 5 years) after 20 years of service, plus 2% of compensation per year over 20 years to a maximum of 70% of average monthly compensation, plus a service increment (maximum \$100) of 1/40th of such pension per year over 20 years. For members hired after 1/1/2012, 50% of average monthly compensation plus an incremental pension (maximum \$100) of 1/40th of such pension per year over 20 years.

Survivor Benefit:

Benefit is 100% of pension benefit to surviving spouse or to child under 18.

Disability Benefit:

Service Related	Monthly disability pension equal to the benefit based upon the normal retirement benefit formula. The disability benefit is reduced by Workers' Compensation.
Non-Service Related	After 10 years, but less than 15 years of service, 30% of average monthly compensation. After 15 years, but less than 21 years of service, 60% of average monthly compensation. After 21 years of service, benefit is based upon normal retirement formula and reduced by Workers' Compensation.

BACKGROUND – (Continued)

Firemen’s Pension Plan

The plan was established April 23, 1940. Active members are required to contribute 8 percent of compensation to the plan. As of December 31, 2013, the plan had 103 active members, no terminated members eligible for vested benefits in the future and 121 retirees receiving pension benefits from the plan.

As of December 31, 2013, selected plan benefit provisions are as follows:

Eligibility Requirements:

Normal Retirement	20 years of service
Early Retirement	None
Vesting	None

Retirement Benefit:

Benefit equals 60% of average monthly compensation (final or average of highest 5 years) after 20 years of service, plus 2% of compensation per year over 20 years to a maximum of 70% of average monthly compensation, plus a service increment (maximum \$100) of 1/40th of such pension per year over 20 years. For members hired after 10/24/2011, 50% of average monthly compensation plus an incremental pension (maximum \$100) of 1/40th of such pension per year over 20 years.

Survivor Benefit:

Benefit is 100% of the pension benefit to surviving spouse or to child under 18.

Service Related Disability Benefit:

Monthly disability benefit equal to the benefit based upon the normal retirement benefit formula.

BACKGROUND – (Continued)

Officers' and Employees' Pension Plan

The plan was established December 28, 1945. Active members are required to contribute 5 percent of compensation to the plan. As of December 31, 2013, the plan had no active members, no terminated members eligible for vested benefits in the future and 52 retirees receiving pension benefits from the plan.

As of December 31, 2013, selected plan benefit provisions are as follows:

Eligibility Requirements:

Normal Retirement	Age 60 and 20 years of service.
Early Retirement	None
Vesting	A member is 100% vested after 12 years of service.

Retirement Benefit:

Benefit equals 2.5% of average monthly salary for each year of service up to 65% of average monthly salary based on the current annual salary or the average of the highest 5 years.

Survivor Benefit:

None

Service Related Disability Benefit:

After 15 years of service the full pension is payable upon permanent disability.

CITY OF BETHLEHEM AGGREGATE PENSION FUND
STATUS OF PRIOR FINDINGS

Compliance With Prior Audit Recommendations

The City of Bethlehem has complied with the prior audit recommendations concerning the following:

Police Pension Plan

· Restated Plan Document Not Adopted By Ordinance

During the current audit period, city officials adopted Ordinance No. 2013-27 which amended and restated the plan's governing document.

Firemen's Pension Plan

· Restated Plan Document Not Adopted By Ordinance

During the current audit period, city officials adopted Ordinance No. 2013-26 which amended and restated the plan's governing document.

CITY OF BETHLEHEM AGGREGATE PENSION FUND
FINDINGS AND RECOMMENDATIONS

Finding No. 1 - Incorrect Data On Certification Form AG 385 Resulting In An Overpayment Of State Aid

Condition: The city failed to certify 1 eligible non-uniformed employee (1 unit) in the officers’ and employees’ PMRS plan and certified 1 ineligible police officer (2 units) on the Certification Form AG 385 filed in 2014, resulting in the city receiving an additional unit of state aid. The data contained on this certification form is based on prior calendar year information.

Criteria: Pursuant to Act 205, at Section 402(e)(2), in order to be eligible for certification, an employee must have been employed on a full-time basis for at least six consecutive months and must have been participating in a pension plan during the certification year.

Cause: In 2013, a retired police officer was hired as a non-uniformed employee. Plan officials inadvertently reported this employee on the police employee roster, instead of the non-uniformed employee roster. In addition, the city lacked adequate internal control procedures to ensure that reporting errors were identified and corrected in a timely manner.

Effect: The data submitted on this certification form is used, in part, to calculate the state aid due to the city for distribution to its pension plans. Because the city’s state aid allocation was based on unit value, the incorrect certification of pension data affected the city’s state aid allocation, as identified below:

<u>Units Overstated</u>	<u>Unit Value</u>	<u>State Aid Overpayment</u>
1	\$ 3,873	\$ 3,873

Recommendation: We recommend that the total excess state aid, in the amount of \$3,873, be returned to the Commonwealth. A check in this amount, with interest compounded annually from date of receipt to date of repayment, at a rate earned by the pension plan, should be made payable to: Commonwealth of Pennsylvania and mailed to: Department of the Auditor General, Municipal Pension & Fire Relief Programs Unit, 320 Finance Building, Harrisburg, PA 17120. A copy of the interest calculation must be submitted along with the check.

We also recommend that in the future, plan officials establish adequate internal control procedures, such as having at least 2 people review the data certified, to ensure compliance with the instructions that accompany Certification Form AG 385 to assist them in accurately reporting the required pension data.

CITY OF BETHLEHEM AGGREGATE PENSION FUND
FINDINGS AND RECOMMENDATIONS

Finding No. 1 – (Continued)

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

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

Finding No. 2 - Incorrect Data Supplied To Actuary For Actuarial Valuation Report Preparation

Condition: Actuarial valuation report forms 202-C, for the firemen’s pension plan, with valuation dates of January 1, 2011 and January 1, 2013, submitted to the Public Employee Retirement Commission (PERC), contained incorrect information. The actuarial valuation report contained a provision for a non-service related disability benefit; however, the plan’s governing document fails to contain a provision for a non-service related disability benefit.

The actuarial valuation contained the following provision:

Schedule (C), at Section IV states:

Non-service related disability benefit – After 10 but less than 15 years of service, 30% of average monthly compensation. After 15, but less than 21 years of service, 60% of average monthly compensation. After 21 years of service, the benefit is based upon the normal retirement benefit formula.

Criteria: Section 201(d) of Act 205 states:

Responsibility for preparation and filing of reports and investigations. The actuarial valuation report or experience investigation required pursuant to subsection (a) shall be prepared under the supervision and at the discretion of the chief administrative officer of the municipality, who shall be responsible for the filing of the document. The actuarial valuation report or experience investigation shall be signed by the chief administrative officer, indicating that to the extent of the understanding and knowledge of the officer, the report or investigation represents a true and accurate portrayal of the actuarial, financial and demographic condition of the pension plan of the municipality.

CITY OF BETHLEHEM AGGREGATE PENSION FUND
FINDINGS AND RECOMMENDATIONS

Finding No. 2 – (Continued)

Cause: The discrepancy in the data submitted to the plan’s actuary occurred because plan officials did not verify that the information was consistent with the plan’s governing document.

Effect: The information contained in the actuarial valuation report is used to determine the municipality’s minimum municipal obligation (MMO); therefore, the incorrect data may have resulted in an erroneous MMO calculation.

Recommendation: We recommend that in the future, plan officials review and verify all information submitted to and received from the plan’s actuary so that future actuarial valuation reports properly reflect the status of the pension plan.

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

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

CITY OF BETHLEHEM AGGREGATE PENSION FUND
 SUPPLEMENTARY INFORMATION
 (UNAUDITED)

SCHEDULE OF FUNDING PROGRESS

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

The actuarial information is required by Act 205 biennially. The historical information, beginning as of January 1, 2009, is as follows:

POLICE PENSION PLAN

	(1)	(2)	(3)	(4)	(5)	(6)
Actuarial Valuation Date	Actuarial Value of Assets (a)	Actuarial Accrued Liability (AAL) - Entry Age (b)	Unfunded (Assets in Excess of) Actuarial Accrued Liability (b) - (a)	Funded Ratio (a)/(b)	Covered Payroll (c)	Unfunded (Assets in Excess of) Actuarial Accrued Liability as a % of Payroll [(b-a)/(c)]
01-01-09	\$ 64,399,190	\$ 74,423,894	\$ 10,024,704	86.5%	\$ 10,058,301	99.7%
01-01-11	63,718,342	83,930,276	20,211,934	75.9%	11,565,225	174.8%
01-01-13	64,468,632	90,776,709	26,308,077	71.0%	11,091,528	237.2%

Note: The market value of the plan's assets at 01-01-09 has been adjusted to reflect the smoothing of gains and/or losses over a 5-year averaging period, which will also be limited to a maximum of 130 percent and a minimum of 70 percent of the fair market value of assets. The market value of the plan's assets at 01-01-11 has been adjusted to reflect the smoothing of gains and/or losses over a 5-year averaging period, which will also be limited to a maximum of 120 percent and a minimum of 80 percent of the fair market value of assets. These methods will lower contributions in years of less than expected returns and increase contributions in years of greater than expected returns. The net effect over long periods of time is to have less variance in contribution levels from year to year.

CITY OF BETHLEHEM AGGREGATE PENSION FUND
 SUPPLEMENTARY INFORMATION
 (UNAUDITED)

SCHEDULE OF FUNDING PROGRESS – (Continued)

FIREMEN’S PENSION PLAN

	(1)	(2)	(3)	(4)	(5)	(6)
Actuarial Valuation Date	Actuarial Value of Assets (a)	Actuarial Accrued Liability (AAL) - Entry Age (b)	Unfunded (Assets in Excess of) Actuarial Accrued Liability (b) - (a)	Funded Ratio (a)/(b)	Covered Payroll (c)	Unfunded (Assets in Excess of) Actuarial Accrued Liability as a % of Payroll [(b-a)/(c)]
01-01-09	\$ 48,780,258	\$55,305,397	\$ 6,525,139	88.2%	\$ 6,544,422	99.7%
01-01-11	48,626,861	62,441,284	13,814,423	77.9%	7,317,502	188.8%
01-01-13	49,055,473	64,153,591	15,098,118	76.5%	6,570,096	229.8%

Note: The market value of the plan’s assets at 01-01-09 has been adjusted to reflect the smoothing of gains and/or losses over a 5-year averaging period, which will also be limited to a maximum of 130 percent and a minimum of 70 percent of the fair market value of assets. The market value of the plan’s assets at 01-01-11 has been adjusted to reflect the smoothing of gains and/or losses over a 5-year averaging period, which will also be limited to a maximum of 120 percent and a minimum of 80 percent of the fair market value of assets. These methods will lower contributions in years of less than expected returns and increase contributions in years of greater than expected returns. The net effect over long periods of time is to have less variance in contribution levels from year to year.

CITY OF BETHLEHEM AGGREGATE PENSION FUND
 SUPPLEMENTARY INFORMATION
 (UNAUDITED)

SCHEDULE OF FUNDING PROGRESS – (Continued)

OFFICERS’ AND EMPLOYEES’ PENSION PLAN

	(1)	(2)	(3)	(4)	(5)	(6)
Actuarial Valuation Date	Actuarial Value of Assets (a)	Actuarial Accrued Liability (AAL) - Entry Age (b)	Unfunded (Assets in Excess of) Actuarial Accrued Liability (b) - (a)	Funded Ratio (a)/(b)	Covered Payroll (c)	Unfunded (Assets in Excess of) Actuarial Accrued Liability as a % of Payroll [(b-a)/(c)]
01-01-09	\$ 7,943,203	\$ 8,984,437	\$ 1,041,234	88.4%	\$ 240,846	432.3%
01-01-11	7,120,687	8,530,589	1,409,902	83.5%	120,237	1,172.6%
01-01-13	6,052,813	6,980,171	927,358	86.7%	None	N/A

Note: The market value of the plan’s assets at 01-01-09 has been adjusted to reflect the smoothing of gains and/or losses over a 5-year averaging period, which will also be limited to a maximum of 130 percent and a minimum of 70 percent of the fair market value of assets. The market value of the plan’s assets at 01-01-11 has been adjusted to reflect the smoothing of gains and/or losses over a 5-year averaging period, which will also be limited to a maximum of 120 percent and a minimum of 80 percent of the fair market value of assets. These methods will lower contributions in years of less than expected returns and increase contributions in years of greater than expected returns. The net effect over long periods of time is to have less variance in contribution levels from year to year.

CITY OF BETHLEHEM AGGREGATE PENSION FUND
SUPPLEMENTARY INFORMATION
(UNAUDITED)

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

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

Trends in unfunded (assets in excess of) actuarial accrued liability and annual covered payroll are both affected by inflation. Expressing the unfunded (assets in excess of) actuarial accrued liability as a percentage of annual covered payroll (Column 6) approximately adjusts for the effects of inflation and aids analysis of the plan's progress made in accumulating sufficient assets to pay benefits when due. Generally, where there is an unfunded actuarial accrued liability, the smaller this percentage, the stronger the plan. When assets are in excess of the actuarial accrued liability, the higher the bracketed percentage, the stronger the plan.

CITY OF BETHLEHEM AGGREGATE PENSION FUND
SUPPLEMENTARY INFORMATION
(UNAUDITED)

SCHEDULE OF CONTRIBUTIONS FROM EMPLOYER
AND OTHER CONTRIBUTING ENTITIES

POLICE PENSION PLAN

Year Ended December 31	Annual Required Contribution	Percentage Contributed
2008	\$ 1,713,031	100.0%
2009	1,847,708	100.0%
2010	1,921,109	100.0%
2011	2,534,484	100.0%
2012	2,520,217	100.0%
2013	3,494,690	100.0%

CITY OF BETHLEHEM AGGREGATE PENSION FUND
SUPPLEMENTARY INFORMATION
(UNAUDITED)

SCHEDULE OF CONTRIBUTIONS FROM EMPLOYER
AND OTHER CONTRIBUTING ENTITIES

FIREMEN'S PENSION PLAN

Year Ended December 31	Annual Required Contribution	Percentage Contributed
2008	\$ 1,018,719	100.0%
2009	1,174,242	100.0%
2010	1,136,780	100.0%
2011	1,672,843	100.0%
2012	1,492,989	100.0%
2013	2,245,105	100.0%

CITY OF BETHLEHEM AGGREGATE PENSION FUND
SUPPLEMENTARY INFORMATION
(UNAUDITED)

SCHEDULE OF CONTRIBUTIONS FROM EMPLOYER
AND OTHER CONTRIBUTING ENTITIES

OFFICERS' AND EMPLOYEES' PENSION PLAN

Year Ended December 31	Annual Required Contribution	Percentage Contributed
2008	\$ 379,382	100.0%
2009	622,663	100.0%
2010	467,762	100.0%
2011	455,998	100.0%
2012	432,315	100.0%
2013	1,051,497	100.0%

CITY OF BETHLEHEM AGGREGATE PENSION FUND
SUPPLEMENTARY INFORMATION
NOTES TO SUPPLEMENTARY SCHEDULES
(UNAUDITED)

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

POLICE PENSION PLAN

Actuarial valuation date	January 1, 2013
Actuarial cost method	Entry age normal
Amortization method	Level dollar
Remaining amortization period	17 years
Asset valuation method	Fair value
Actuarial assumptions:	
Investment rate of return	7.5%
Projected salary increases	4.5%

CITY OF BETHLEHEM AGGREGATE PENSION FUND
SUPPLEMENTARY INFORMATION
NOTES TO SUPPLEMENTARY SCHEDULES
(UNAUDITED)

FIREMEN'S PENSION PLAN

Actuarial valuation date	January 1, 2013
Actuarial cost method	Entry age normal
Amortization method	Level dollar
Remaining amortization period	15 years
Asset valuation method	Fair value
Actuarial assumptions:	
Investment rate of return	7.5%
Projected salary increases	4.5%

CITY OF BETHLEHEM AGGREGATE PENSION FUND
SUPPLEMENTARY INFORMATION
NOTES TO SUPPLEMENTARY SCHEDULES
(UNAUDITED)

OFFICERS' AND EMPLOYEES' PENSION PLAN

Actuarial valuation date	January 1, 2013
Actuarial cost method	Entry age normal
Amortization method	Level dollar
Remaining amortization period	2 years
Asset valuation method	Fair value
Actuarial assumptions:	
Investment rate of return	7.5%
Projected salary increases	4.5%

CITY OF BETHLEHEM AGGREGATE PENSION FUND
REPORT DISTRIBUTION LIST

This report was initially distributed to the following:

The Honorable Tom Corbett
Governor
Commonwealth of Pennsylvania

City of Bethlehem Aggregate Pension Fund
Northampton County
10 East Church Street
Bethlehem, PA 18018

The Honorable Robert J. Donchez	Mayor
Mr. J. William Reynolds	Council President
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Mr. Mark W. Sivak	Director of Budget and Finance
Ms. Cynthia H. Biedenkopf	City Clerk

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