

**SAINT AUGUSTINE'S UNIVERSITY**  
**INDEPENDENT ACCOUNTANT'S REPORT ON**  
**APPLYING AGREED UPON PROCEDURES**

**July 1, 2021, through October 31, 2024**

SAINT AUGUSTINE'S  
UNIVERSITY



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*Transform. Excel. Lead*



**SAINT AUGUSTINE'S UNIVERSITY  
Raleigh, North Carolina**

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**INDEPENDENT ACCOUNTANT’S REPORT ON  
APPLYING AGREED UPON PROCEDURES**

To the Board of Trustees of  
Saint Augustine's University  
Raleigh, North Carolina

We have performed the procedures enumerated below on the cash transactions of Saint Augustine's University ("the University") as for the period July 1, 2021, through October 31, 2024.

The University has agreed to and acknowledged that the procedures performed are appropriate to meet the intended purpose of identifying whether the Brian Boulware, Chairman of the Board of Trustees of the University, received a credit for payment of an alleged broker's fee or finder's fee in the amount of \$28,000, in connection with a line of credit for the University with the Bank OZK in 2023. This report may not be suitable for any other purpose. The procedures performed may not address all the items of interest to a user of this report and may not meet the needs of all users of this report and, as such, users are responsible for determining whether the procedures performed are appropriate for their purposes.

The procedures and associated findings are as follows:

**1. Determine whether the University paid Brian Boulware an amount in connection with the arrangement of the line of credit provided to it by the Bank OZK.**

**Procedure(s) performed:**

We reviewed all cash disbursements records, check registers and bank statements for all bank accounts maintained by the University for the period July 1, 2021, through October 31, 2024. This includes checks drawn or debits made against those accounts in favor of Brian Boulware or any business owned by him.

**Conclusion:**

The results of the procedure revealed that the University did **not pay** Brian Boulware any amount in connection with the arrangement of the line of credit with Bank OZK.

**2. Determine whether the University gave "soft" credit to Brian Boulware for a contribution of the amount purported to be a broker's fee or a finder's fee.**

**Procedure(s) performed:**

We reviewed all a list of persons who gave contributions and donations to the University in the amount of \$5,000 or more.

**Conclusion:**

The results of this procedure revealed that the University did **not** give Brian Boulware any “soft” or any type of credit for a contribution of an amount purported to be a broker’s fee or a finder’s fee.



**3. Determine whether the Bank OZK paid to the University an amount for a broker's or finder's fee.**

**Procedure(s) performed:**

We interviewed a Senior Officer familiar with and engaged in the line of credit transaction with the University. We interviewed Brian Boulware about the allegation of the broker's fee or finder's fee that is being discussed and reference made in the Audited Financial Report for the year ending June 30, 2021. We further reviewed an affidavit provided by Brian Boulware regarding his role in the credit decisions by the University and his relationship with the lenders used by the University.

**Conclusion:**

The Senior Officer with Bank OZK, an Executive Vice President involved in the transaction stated unequivocally that there was no such transaction planned, contemplated or otherwise, where consideration or discussion of paying a finder's fee or broker's fee to Brian Boulware or anybody else at the origination of this transaction. The only discussion had after the transaction had been finalized was with a former president of the University who, in his words, for some reason, brought up the idea of the bank paying such an amount to Brian Boulware. He responded very clearly to this matter by stating that no such transaction was contemplated, nor would one be forthcoming from the Bank OZK. Any payments that the University wanted to make to a Trustee was in their purview, not the banks.

Brian Boulware provided an Affidavit to us in this matter that clearly states his role and involvement in the University's borrowings and his relationship to lenders. We have attached a copy of that Affidavit to this report.

As to the statement in the Audit Report for the year June 30, 2021, he felt that there was no evidence that supported that statement. That it was hearsay and there was no evidence in the accounting records that supported it, whatsoever. We conclude, likewise, as there is nothing in the accounting records that corroborates it.

**4. Determine whether said amount was included in the Closing Statement provided by the Bank OZK documenting the line of credit transaction.**

**Procedure(s) performed:**

We obtained a copy of the Closing Statement directly from the Bank OZK that outlined closing credits and closing costs associated with the revolving line of credit to the University.

**Conclusion:**

We reviewed the Closing Statement and determined that there was nothing included on it that remotely supported that a broker's fee or a finder's fee was paid either to the University or to Brian Boulware from this transaction. All of the credits and charges were normal and nothing deceptive was evident.



To the Board of Trustees of  
Saint Augustine's University  
Raleigh, North Carolina  
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- 5. Determine whether the University paid any amounts to Brian Boulware, or any business owned and/or operated by him for any reason or purpose from July 1, 2021 through October 31, 2024. If so determined, the reason for such payments.**

**Procedure(s) performed:**

We reviewed the cash disbursements journal, check registers and bank statements for all of the bank accounts maintained by the University for the period July 1, 2021, through October 31, 2024, as stated in No. 1 above, for evidence of checks drawn on those accounts, debits to the accounts, wire transfers or any other means of transferring monies to Brian Boulware or any businesses he owns or operates.

**Conclusion:**

Our review revealed that the University did **not** make any payments of any sort to Brian Boulware or his business.

We were engaged by the University to perform this agreed upon procedures engagement and conducted our engagement in accordance with attestation standards established by the AICPA. We were not engaged to and did not conduct an examination or review engagement, the objective of which would be the expression of an opinion or conclusion. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

We are required to be independent of the University and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements related to our agreedupon procedures engagement.

This report is intended solely for the information and use of the University and is not intended to be and should not be used by anyone other than those specified parties.

November 26, 2024

Birmingham, Alabama

*Bank, Finley White & Co.*

AFFIDAVIT

I, the undersigned Affiant, being first duly sworn, say the following:

1. I currently serve as a member of the Board of Trustees of St. Augustine's University.
2. I am aware of the loans that St. Augustine's University has received from Gothic Ventures.
3. I did not receive any financial compensation of any form, related to any loan which St. Augustine's University received from Gothic Ventures, Gothic Falcon, LLC or any other entity.
4. I am unaware of any other member of the Board of Trustees of St. Augustine's University that has received any financial compensation of any form as a result of any loan provided to St. Augustine's University.
5. I do not have any financial relationship Gothic Ventures, Gothic Falcon, LLC or any other entity with any entity that has provided a loan to St. Augustine's University.



[BRIAN BOULWARE], Affiant

[State of North Carolina Wake COUNTY of Residence

I, Rea Laska, a Notary Public in and for said County and State, do hereby certify that [BRIANBOULWARE], Affiant personally appeared before me this day and acknowledged the due execution of the foregoing Affidavit.

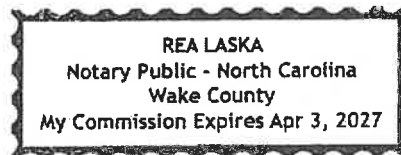
WITNESS my hand and notarial seal, this 22 day of November, 2024.



Notary Public

Printed Name: Rea Laska

My Commission Expires: April 3, 2027



[Notarial Seal]