

LONG FORM AUDIT REPORT LFAR

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**PUNE BRANCH OF WIRC OF ICAI
SEMINAR ON BANK BRANCH AUDIT
16TH MARCH 2025**

DISCLAIMER

- The comments in the PPT and during presentation are my own opinions and views. Kindly do not consider as official views of ICAI
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INTRODUCTION

- Introduced in 1985 by RBI; Revised in 2003 and now in 2020
- Report on adherence to Internal Control Measures
- To be submitted by Concurrent Auditors' for Branches below cut off point
- Coverage and depth increased over period
- Transaction audit / Data analysis/ Understanding Computer software – Finnacle etc.
- Press Release dated-Jun 29, 2018: Enforcement action framework in respect of statutory auditors for the lapses in the statutory audit of commercial banks the [RBI circular DBR.BP.BC.No.63/21.04.018/2016-17 dated April 18, 2017.](#)

STANDARDS OF AUDITING

- SA 230 – Audit Documentation
 - The objective of the auditor is to prepare documentation that provides:
 - (a) A sufficient and appropriate record of the basis for the auditor's report; and
 - (b) Evidence that the audit was planned and performed under SAs and applicable legal and regulatory requirements.
- SA 700 – REVISED – Forming an opinion and reporting on Financial statements
- SA 530 – Audit Sampling
- (SA) 260(Revised), Communication with Those Charged with Governance
- SA 220 - Quality Control for an Audit of Financial Statements

SA 230 – Audit Documentation

- Three Types of Documentation
 - Working papers
 - Audit Evidences/ Supporting
 - Evidencing Formation of opinion
- Timeline
 - Initial Stage (Appointment letter, Audit program)
 - During Audit (Advances Checklist, Deposits/ Loans Sample, Trial Balance, Account statements)
 - Conclusion (Review process – Sign off)

BEFORE THE AUDIT

- Study Previous Year LFAR/ Independent Audit Report. (Copy paste from previous year report to be avoided)
- Study LFAR Questionnaire
 - Delegation of Authority - Limits fixed / Instructions of controlling authority
 - Answers based on opinion
 - Answers based on Test Checks
 - Answers based on System in Operation
 - Questions relating to suggestions
- LFAR questions are only indicative in nature.
- Repeat major qualifications in main report

PLANNING FOR LFAR

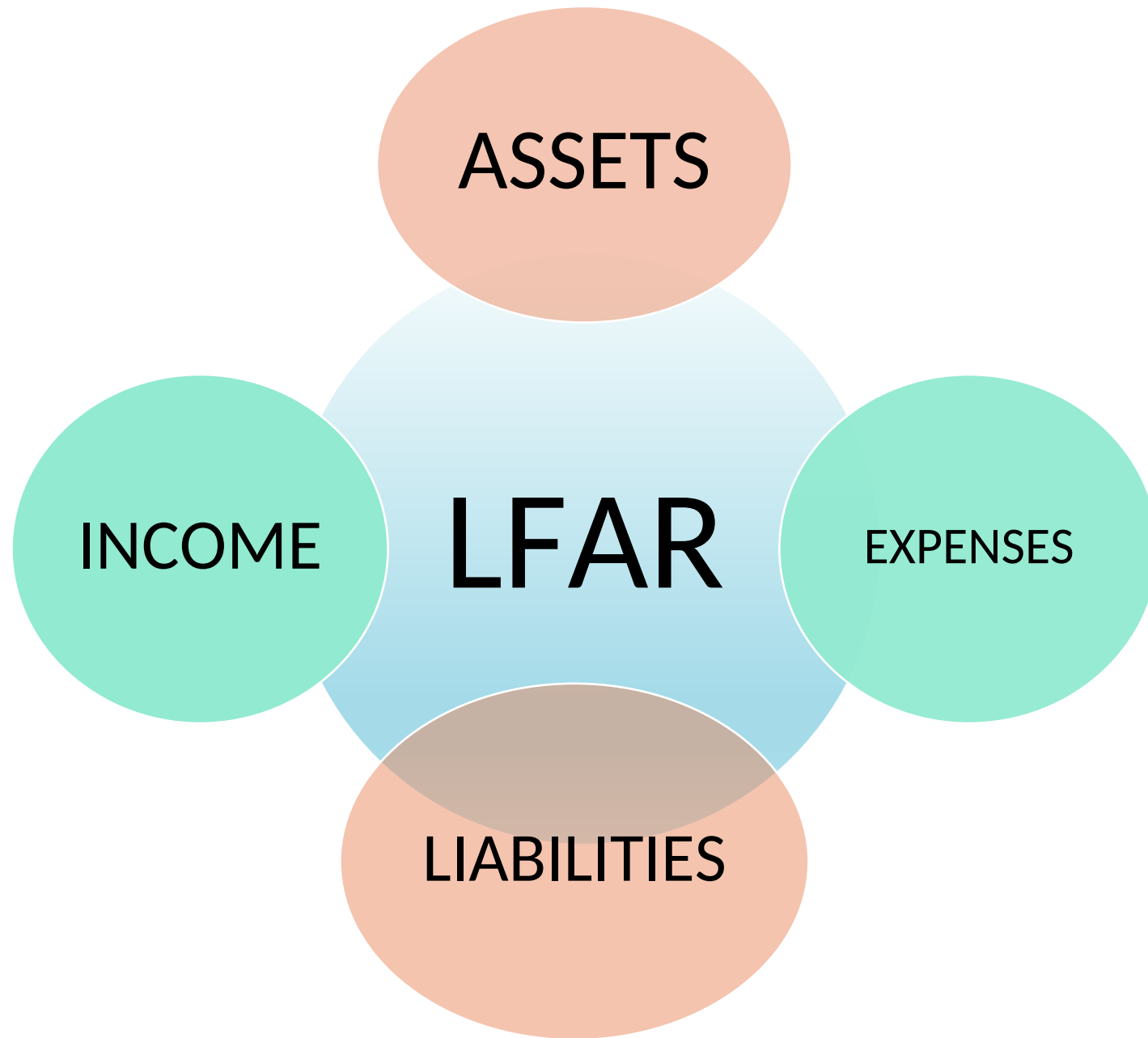
- One person per branch to handle/ control LFAR input
- At least one person with computer system report handling
- Requirements to be emailed/ communicated before starting actual audit/ visit to branch
- Verification of information given and comments in LFAR to be simultaneous with actual audit
- No vague or general comments; To be commented with reasons
- Queries to be segregated internally into:
Shortcoming/weaknesses/reservations / adverse comments



DURING THE AUDIT

- Submit all queries to concerned person. Before finalizing comments of LFAR, share the draft report for discussing with branch head.
- Comments / response of branch head should be given due consideration before finalizing the LFAR. Kindly document the same.
- Give specific disclosures on nature and extent of work done and limitations
- Give disclaimer for non-availability of records





ASSETS - Cash



- a. Does the system ensure that cash maintained is in effective joint custody of two or more officials, as per the instructions of the controlling authorities of the bank?

- b. Have the cash balances at the branch/ATMs been checked at periodic intervals as per the procedure prescribed by the controlling authorities of the bank?

System of Control over Cash

E.g. Dual custody, Key Register,
Guidelines given to branches: Bait money

Small branches issues!

Who has checked and when? Note down in working papers.

Procedure of bank: comment on verification

c. (i) Does the branch generally
maintain/ carry cash balances, which
vary significantly from the limits
fixed by the controlling authorities of the
bank?

Excess cash retention report
Reasons? Whether reported
Retention limit – Copy for
Working paper

(ii) Does the figure of the balance in the
branch books in respect of cash with its
ATM(s) tally with the amounts of
balances with the respective ATMs,
based on the year end scrolls
generated by the ATMs? If there is any
difference, same should be reported.

Physical verification
System of reporting differences in
ATM, from time to time

d. Whether the insurance cover available
with the branch adequately meets the
requirement to cover the cash-in hand and
cash-in transit?

Copy of Insurance cover
Comment on adequacy

ASSETS – Balances with RBI, SBI and Other Banks

<p>a. Were <u>balance confirmation certificates</u> obtained in respect of outstanding balances as at the year-end and whether the aforesaid balances have been reconciled? The nature and extent of differences should be reported</p> <p>b. Observations on the <u>reconciliation statements</u> may be reported in the following manner:</p> <p>(i) Cash transactions remaining un-responded (give details)</p> <p>(ii) Revenue items requiring adjustments / write-off (give details)</p> <p>(iii) Other credit and debit entries originated in the statements provided by RBI/other banks, remaining un-responded for more than 15 days</p>	<p>Trial-balance, balance confirmation certificates and bank reconciliation – working paper</p> <p>All documents - Signed and stamped</p> <p>Time lapse for response – one / two days</p> <p>Any parked amounts in bank reconciliation to be scrutinised</p> <p>Unreconciled entries statement to be verified and commented</p>
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<p>iv. Where the branch maintains an account with RBI, the following additional matter may be reported: Entries originated prior to, but communicated / recorded after the year end <u>in relation to currency chest operations</u> at the branch/other link branches, involving deposits into/withdrawals from the currency chest attached to such branches (Give details)</p> <p>c. In case, <u>any matter</u> deserves special attention of the management, the same may be reported.</p>	<p>Currency chest and other special audit</p> <p>Long outstanding entries to be given special attention</p> <p>Comments on manner/ process/ system may be made under this comment</p>
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ASSETS – Money at call or short notice

<p>(a) Has the <u>branch kept</u> money-at-call and short notice during the year?</p> <p>(b) Has the <u>year-end balance</u> been duly confirmed and reconciled?</p> <p>(c) Has <u>interest accrued</u> up to the year-end been properly recorded?</p> <p>(d) Whether <u>instructions/guidelines</u>, if any, laid down by the controlling authorities of the bank have been complied with?</p>	<p>Generally in Special branches/ Investment branches.</p> <p>Specific guidelines if such branch is received. Obtain all internal circulars for the same.</p> <p>Baseline check: No long outstanding balance and all entries should have been unreconciled and responded. Do check all major transactions.</p> <p>Interest received/ paid to be checked</p>
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ASSETS – Investments (for branches outside India)

<p>a. In respect of purchase and sale of investments, has the branch acted within its delegated authority, having regard to the <u>instructions/ guidelines</u> in this behalf issued by the controlling authorities of the bank?</p> <p>b. Have the investments held by the branch whether on its own account or on behalf of the Head Office/other branches been made available for <u>physical verification</u>? Where the investments are not in the possession of the branch, whether <u>evidences</u> with regard to their physical verification have been produced?</p>	<p>Guidelines/ Instruction to be obtained</p> <p>Physical verification to be carried out of all the investments made and cross verified with the book balance.</p> <p>If not in physical form, ledger balances like CDSL to be obtained for verification.</p>
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<p>c. Is the <u>mode of valuation of investments</u> in accordance with the RBI guidelines or the norms prescribed by the relevant regulatory authority of the country in which the branch is located <u>whichever are more stringent</u>?</p> <p>d. Whether there are any <u>matured or overdue investments</u> which have not been encashed and / or has not been serviced? If so, give details?</p>	<p>Specific valuation guidelines of RBI</p> <p>And guidelines of regulatory authority of the particular country</p> <p>Whether Revenue leakage on account of Non-renewal / encashed but not used to be ascertained. Reasons for non-encashment, if any and provision made therefor, to be commented upon.</p> <p>Process/ System may also be commented upon</p>
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OTHER ASSETS

(a) **Suspense Accounts/Sundry Assets**

- i. Does the system of the bank ensure expeditious clearance of items debited to Suspense Account? Details of outstanding entries in excess of 90 days may be obtained from the branch and the reasons for delay in adjusting the entries may be ascertained. Does your scrutiny of the accounts under various sub-heads reveal balances, which in your opinion are not recoverable and would require a provision/write-off? If so, give details.
- ii. Does your test check indicate any unusual items in these accounts? If so, report their nature and the amounts involved. Are there any intangible items under this head e.g. losses not provided /

Verify branch system of clearance of suspense items.

Do not rely only on given agewise analysis of outstanding transactions. Actually verify in the books of account and cross match with vouchers/challans.

Identify unrecoverable amounts for which provision required or possible write off!

Verify opening balance breakup/ age wise analysis of previous year. Compare with current year.

Unexplained debits to be ascertained

OTHER LIABILITIES

1. Deposits

(a) Does the bank have a system of identification of dormant/ inoperative accounts and internal controls with regard to operations in such accounts? In the cases examined by you, have you come across instances where the guidelines laid down in this regard have not been followed? If yes, give details thereof.

(b) After the balance sheet date and till the date of audit, whether there have been any unusual large movements (whether increase or decrease) in the aggregate deposits held at the year-end? If so, obtain the clarifications from the branch and give your comments thereon.

System and internal controls to be checked. Comment on the same.

Whether as per guidelines?

Control on revival of inoperative/ dormant accounts. How is KYC preserved?

Operations in such accounts. Reporting by exception includes this type of report?

Obtain account balancing of inoperative/ dormant accounts for previous year and current year close. Same type of balancing to be obtained for all types of deposit accounts and after the year end too. Identify type of accounts where there is unusual movement.

OTHER LIABILITIES

1. Deposits... Contd..

(c) Whether the scheme of automatic renewal of deposits applies to FCNR(B) deposits? Where such deposits have been renewed, report whether the branch has satisfied itself as to the 'non-resident status' of the depositor and whether the renewal is made as per the applicable regulatory guidelines and the original receipts / soft copy have been dispatched.

(d) Is the branch complying with the regulations on minimum balance requirement and levy of charges on non-maintenance of minimum balance in individual savings accounts?

Guidelines to be obtained

Process of confirmation of Non-resident status

Process of renewal / auto-renewal of receipts and dispatch process.

Crosscheck with outward data/ expenses on postage if couriered

Process/ Norms of identifying accounts for charging minimum balance charges. Comment on adherence to guidelines.

OTHER LIABILITIES

2. Other Liabilities - *Bills Payable, Sundry Deposits, etc.*

(a) The number of items and the aggregate amount of old outstanding items pending for one years or more be obtained from the branch and reported under appropriate heads. Give details thereof.

(a) Does your test check indicate any unusual items or material withdrawals or debits in these accounts? If so, give details thereof

3. Contingent Liabilities

List of major items of the contingent liabilities (other than constituent's liabilities such as guarantees, letter of credit, acceptances, endorsements, etc.) not acknowledged by the branch

Age-wise analysis to be obtained.

Verify the transactions squared off as well, even of not appearing in the books

Obtain previous list of contingencies. Verify the items identified in current year. Scrutinise expenses for identifying contingent liabilities.

PROFIT AND LOSS ACCOUNT

(a) Has the test checking of interest/ Discount/ commission/ fees etc. revealed excess/short credit of a material amount? If so, give details thereof.

All types of income to be covered.
Other than interest, cross check from GST returns.

(b) Has the branch complied with the Income Recognition norms prescribed by R.B.I.? (The Auditor may refer to the instructions of the controlling authorities of the bank regarding charging of interest on non-performing assets).

While checking IRAC, interest not charged, to be verified
No interest to be charged on any NPA account.

(c) Has the test check of interest on deposits revealed any excess/short debit of material amount? If so, give details thereof.

Details of accounts verified for interest to be preserved.
Check process of application of interest to all accounts.
Crosscheck with TDS/ AIR data submitted

PROFIT AND LOSS ACCOUNT

(d) Does the bank have a system of estimating and providing interest accrued on overdue/ matured/ unpaid/ unclaimed term deposits including in respect of deceased depositors?

(e) Are there any divergent trends in major items of income and expenditure, in comparison with corresponding previous year, which are not satisfactorily explained by the branch? If so, the same may be reported.

Ascertain the bank's process of applying such type of interest.

Policy of bank for interest rate on such deposits . Cross check whether the amount of interest provided by HO, if not by branch is generally commensurate with the amount of overdue/ matured etc. type of deposits. The amount of overdue/matured deposits should be mentioned in LFAR.

Divergent trends, whether included in exceptional reports- to be commented.

Preserve working paper of calculating divergent trend.

GENERAL

1. GOLD/ BULLION / SECURITY ITEMS

- (a) Does the system ensure that gold/bullion is in effective joint custody of two or more officials, as per the instructions of the controlling authorities of the bank?
- (b) Does the branch maintain adequate records for receipt, issues and balances of gold/bullion and updated regularly? Does the periodic verification reveal any excess/ shortage of stocks as compared to book records and if any discrepancies observed have been promptly reported to controlling authorities of the bank?
- (c) Does the system of the Bank ensure adequate internal control over issue and custody of security items (Term Deposit Receipts, Drafts, Pay Orders, Cheque Books, Traveller's Cheques, Gift Cheques, etc.)? Whether the system is being followed by the branch? Have you come across cases of missing/lost items?

Internal policies for control to be checked. Comment on level of controls at branch.

Ascertain whether the branch has transactions pertaining to gold/ bullion. Verify major items of transactions on test check basis by checking the vouchers too. Physical stock to be verified and cross checked with book stock.

Control & custody of sensitive stationery is required to be verified and commented. Missing items can be found only on physical verification. Concurrent audit reports, if any should also be verified for this point and actual physical verification to be carried out.

GENERAL

2. Books and Records:

(a) Whether there are any software / systems (manual or otherwise) used at the branch which are not integrated with the CBS? If yes, give details thereof.

(b)

i. In case the branch has been subjected to IS Audit whether there are any adverse features reported and have a direct or indirect bearing on the branch accounts and are pending compliance? If yes give details.

ii. Whether branch is generating, and verifying exception reports at the periodicity as prescribed by the bank

iii. Whether the system of bank warrants expeditious compliance of daily exception reports and whether there are any major observations pending such compliance at the year end.

Manual records maintained to be ascertained. A list to be obtained as a part of first information required from the branch.

Obtain the IS audit report for the branch and carry out impact analysis of the adverse points.

As far as computer records, which all are generated periodically need to be ascertained and commented. Internal guidelines for list of reports to be generated. Whether expeditious compliance carried out to be checked

GENERAL

- iv. Whether the bank has laid down procedures for manual intervention to system generated data and proper authentication of the related transactions arising there from along with proper audit trail of manual intervention has been obtained.
- v. Furnish your comments on data integrity (including data entry, checking correctness/integrity of data, no back ended strategies etc.) which is used for MIS at HO / CO level.

3. Inter-Branch Accounts

Does the branch expeditiously comply with/respond to the communications from the designated cell/Head Office as regards unmatched transactions? As at the year-end are there any un-responded/un-complied queries or communications beyond 7 days? If so, give details?

Find out manual intervention in the system of bank. The report of such transactions to be obtained along with guidelines for approval of same.

Understand the system of branch for reconciliation of inter-bank branch accounts. Generally there are no un-responded entries.

Internal guideline for processing of such advices to be checked. Check specifically for month end transactions and recurring amounts.

GENERAL

Books and Records contd.

The auditor may review the process of creation of new logins, change of password the administrative control to access different files or reports through computerized system. There should be maker checker system.

- Updating of the master data should be under supervisory control. The modification in the master data should be registered to Branch Manager only.
- The auditor should also review the contingency and disaster recovery plan for the computer system. Timely backups, offsite backups etc. should be reviewed to understand the backup procedure.

GENERAL

4. Frauds

Furnish particulars of:

- (i) Frauds detected/classified but confirmation of reporting to RBI not available on record at branch.
- (ii) Whether any suspected or likely fraud cases are reported by branch to higher office during the year? If yes, provide the details thereof related to status of investigation.
- (iii) In respect of fraud, based on your overall observation, please provide your comments on the potential risk areas which might lead to perpetuation of fraud (e.g. falsification of accounts/false representation by the borrower; misappropriation of funds especially through related party/ shell company transactions; forgery and fabrication of financial documents like invoices, debtor lists, stock statements, trade credit documents, shipping bills, work orders and encumbrance certificates and avail credit;

Whether frauds have happened in the branch. Check for any FIU report informed by branch to zonal/ HO.

Obtain MRL for no frauds during the year from branch.

Understand whether it is a case of misappropriation of funds or diversification of funds.

If reporting has been carried out, then ascertain the modus operandi and the likelihood of recurrence. Provisions to be made accordingly.

Fraud prone areas to be commented upon

GENERAL

4. Frauds contd..

iii) Contd....

Use of current accounts outside consortium where Trust and Retention Account (TRA) is maintained, to divert funds; List of Debtors/ Creditors were being fabricated and receivables were not followed up/ write off of debt of related parties; Fake export/shipping bill, etc.; Over statement of invoice amounts, stock statements, shipping bills, turnover; fly by night operations –including the cases where vendors, related/ associate parties, manufacturing units etc. aren't available on the registered addresses; Round Tripping of funds, etc.)

(iv) Whether the system of Early Warning Framework is working effectively and, as required, the early warning signals form the basis for classifying an account as RFA.

Various methods of possible frauds need to be checked while verifying loans and advances.

Obtain data of Red flag accounts (RFA).

Ascertain the Early warning framework of the bank.
In loans and advances there are around 42 cases of marking accounts as RFA. Check/ Disclaim as per the cases verified during the audit.

Notification RBI/2014-15/590
DBS.CO.CFMC.BC.No.007/23.0
4.001/2014-15 dated May 7, 2015.

GENERAL

5. Implementation of KYC/AML guidelines

Whether the branch has adequate systems and processes, as required, to ensure adherence to KYC/AML guidelines towards prevention of money laundering and terrorist financing

Whether the branch followed the KYC/AML guidelines based on the test check carried out by the branch auditors

6. Management Information System

(a) Whether the branch has the proper systems and procedures to ensure data integrity relating to all data inputs which are to be used for MIS at corporate office level and for supervisory reporting purposes. Have you come across any instances where data integrity was compromised?

Internal circulars of bank for adherence to KYC/AML to be ascertained.

Only clearing entries- no actual deposit/ withdrawal.

Whether list of names of terrorist financing groups/ alerts informed to the branch on a regular basis?

Data of checking of deposit-accounts to be preserved.

Current process of generating MIS to be checked.

These reports to be perused with a view to understand the systems and procedures followed by branch.

GENERAL

7. Miscellaneous

- (a) In framing your audit report/LFAR, have you considered the major adverse comments arising out of the latest reports such as:
- i) Previous year's Branch Audit Report / LFAR;
 - ii) Internal audit/ Snap Audit/ concurrent audit report(s);
 - iii) Credit Audit Report;
 - iv) Stock audit Report;
 - v) RBI Inspection Report, if such inspection took place;
 - vi) Income and Expenditure (Revenue) Audit;
 - vii) IS/IT/Computer/Systems Audit; and
 - viii) Any special inspection / investigation report?

Obtain all the latest reports (minimum all the reports listed in LFAR).

If any additional reports obtained, include in your comments.

Against each report, mention the date of latest reports and in case of Credit report and stock audit reports mention the number of accounts.

If lower than what is expected, include the same in your comments.

Adverse comment in each report to be given weightage considering the branch compliance.

GENERAL

(b) Are there any other matters, which you, as branch auditor, would like to bring to the notice of the management or the Statutory Central Auditors? Are there any other matters, which you, as branch auditor, would like to bring to the notice of the management or the Statutory Central Auditors?

All those matters that may affect the final presentation of B/sheet and or affecting the P&L to be reported.

E.g.

Exception reports do not include identification of transactions in inoperative / dormant accounts.

Locker operations

Bank guarantees

Letter of Credit

Any unusual item in Balancesheet

LOANS AND ADVANCES

For all accounts above the threshold, the transaction audit/account specific details to be seen and commented, whereas **below the threshold**, the process needs to be checked and commented upon. Comments of the branch auditor on advances with significant adverse features, which might need the attention of the management / Statutory Central Auditors, should be appended to the LFAR.

Have you come across cases of frequent renewal / rollover of short-term loans? If yes, give the details of such accounts.

Indicate the cases of **advances to noncorporate entities** with limits beyond that is set by the bank where the branch has not obtained the duly audited accounts of borrowers.

List of such accounts and account information to be documented.

Sampling to include all types of accounts in addition to ALL above threshold.

Use of concurrent audit reports

Use of exceptional reports

Audited accounts

LOANS AND ADVANCES

Has the inspection or physical verification of securities charged to the bank been carried out by the branch as per the **procedure laid down** by the controlling authorities of the bank?

Whether there is a **substantial deterioration** in value of security during financial year as per latest valuation report in comparison with earlier valuation report on record?

Whether the branch has any **red-flagged account**? If yes, whether any deviations were observed related to compliance of bank's policy related with Red Flag Accounts?

Expected Procedure to be understood including recording of values in the system

Report of valuations – use concurrent audit reports for dates of valuation.

The loan agreement with the borrower shall contain clauses for conduct of such audit at the behest of lender(s) consequent upon red flagging of the account.

RBI/DOS/2024-25/118
DOS.CO.FMG.SEC.No.5/23
.04.001/2024-25 July 15,
2024

CERTIFICATION

- List of certificates would be given in Annual Closing Manual of the Bank or in Appointment letter
- Refer Guidance Note on Reports and Certificates for Special Purpose – ICAI
- Ensure proper documentation for each certificate issued
- Issue Nil certificate; Don't keep blank

Obtain the list of certification to be done before the start of audit

Documentation is a must; System generated reports also can have breakup and backworking!

CERTIFICATION

- a. ALM reporting
- b. Movement of NPAs
- c. Provision for Un-hedged foreign currency exposure
- d. Sector wise lending
- e. Certificate relating to credit/ deposit ratio.
- f. Statement of accounts Re-structured/ Re-scheduled/ Re-negotiated relating to stressed accounts; Projects under implementation
- g. Certificate on Unhedged Foreign Currency Exposure in case of Borrowal having exposure of Rs.1 crore or more.

Sector wise lending, NPA movement to be verified during and end of audit.

Information of restructured, rescheduled to be obtained before start of audit

Projects under implementation to be checked to identify stalled or delayed projects.

System of identifying Unhedged funds to be ascertained before issuing certificate.

CERTIFICATION

- g. Certificate on Unhedged Foreign Currency Exposure in case of Borrowal having exposure of Rs.1 crore or more.
- h. Certificate on exposure to sensitive sectors .i.e. exposure to Capital Market, Infrastructure & Real Estate Sector.
- i. Certificate on Capital Adequacy
- j. Reporting on compliance with SLR requirements (12 odd dates)
- k. Report about serious irregularities requiring immediate action

Classification of Sensitive sector to be checked simultaneously with Loans

SLR working to be checked for wrong figure work.

If maintained in manual register, obtain the internal circular of bank for guideline

How serious irregularities are identified. Internal circular if any to be taken on record. System of identification and parameters.

CERTIFICATION

<p>l. Certification of technology up gradation fund scheme (TUFS) – non SSI textile centre.</p> <p>m. Certificate relating to recoveries in claim paid accounts under Small Loans Guarantee Scheme 1971/Small Loans (SSI) Guarantee Scheme, 1981.</p> <p>n. Certificate Central sector interest subsidy scheme.</p> <p>o. Certificate for agricultural interest subvention claim @2% for residual period of repayment of the loans disbursed during FY.</p> <p>p. Certificate for agricultural interest subvention claim @2% for disbursements made during FY.</p> <p>q. Certificate for additional interest subvention (Incentive @3%) for prompt repayment for short term production</p>	<p>All certification has relevant internal circulars as well as Central State government guideline. Obtain the same on record.</p> <p>Interest subvention to be issued carefully.</p> <p>Check 'Prompt repayment'</p>
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CERTIFICATION

- r. Certificate of cash and bank balances.
- s. Certificate relating to MOC entries of the previous years being accounted for.
- t. Certification for advances to infrastructure project and income generated thereon.
- u. Certificate of advances exceeding Rs.10 Crores.
- v. Certificate for Gold Stocks held for Sale of Gold/Metal Gold Loans.
- w. Certificate for Gold Coins Held.
- x. Certificate for Gold Deposit Scheme.

- y. Ghosh Committee has made recommendations with regard to action taken by the branch to prevent frauds and malpractices.
- z. Jilani committee has made recommendations with regard to action taken by the branch on internal control issues, inspections and audit compliances.

Part of LFAR

Check each and every point and give disclaimer wherever required.
Implementation status of above recommendations needs to be verified by the branch auditor and report.

Credits

- Internet images
- Presentations by CA Aanand P, CA Shriniwas Joshi and CA Manohar Gupta
- Article by CA Abhay Kamat
- Inputs by CA Shashank Patki

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Thankyou!

