



TALIHINA PUBLIC SCHOOL DISTRICT

Citizen Petition Audit Report

November 16, 2023

Cindy Byrd, CPA
State Auditor & Inspector

TALIHINA PUBLIC SCHOOL DISTRICT

CITIZEN PETITION AUDIT REPORT

November 16, 2023



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TO THE PETITIONERS AND CITIZENS OF THE TALIHINA PUBLIC SCHOOL DISTRICT

Transmitted herewith is the citizen petition audit report of the Talihina Public School District. The goal of the State Auditor and Inspector is to promote accountability and fiscal integrity in state and local government. Maintaining our independence as we provide this service to the taxpayers of Oklahoma is of utmost importance.

We wish to take this opportunity to express our appreciation for the assistance and cooperation extended to our office during this engagement.

This report is a public document pursuant to the Oklahoma Open Records Act, 51 O.S. §§ 24A.1, *et seq.* and is available to any person for inspection and copying.

Sincerely,

A handwritten signature in blue ink that reads "Cindy Byrd".

CINDY BYRD, CPA
OKLAHOMA STATE AUDITOR & INSPECTOR

Introduction The Talihina Public School District, LeFlore County, Oklahoma, (District) is part of the Oklahoma State System of Public Education as described in 70 O.S. § 1-101 *et seq.* of the Oklahoma School Code.

The governing body of each school district in Oklahoma is the board of education. As provided for in 70 O.S. § 5-117, a board has the power to maintain and operate a complete public-school system of such character as deemed best suited for the needs of the school district. The superintendent acts as the executive officer of the board and shall perform duties as the school board directs.

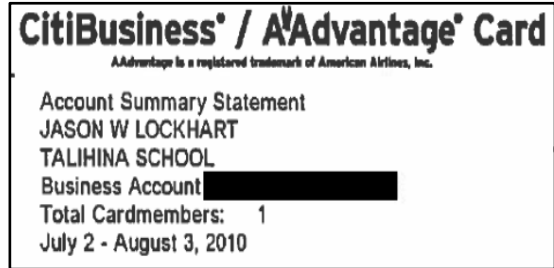
Objectives In a petition verified by the LeFlore County Election Board, the citizens of the District requested an audit of the following concerns. These concerns were used to develop the objectives addressed in this report.

1. Review the use of the District's credit card for possible personal, unreimbursed expenses.
2. Review all administrative and teacher certifications, salaries, and/or duties to determine compliance with state standards and District policies per position and possible nepotism in the hiring/placement of personnel.
3. Review extra duty contracts/compensation/certification/attendance including comparing annual Choctaw Nation grant funds to actual expenditures.
4. Review receipting/expenditure of all District funds including general and activity funds.
5. Review "weekend school" to determine if the District Board authorized its implementation and its purported restricted use to reduce the number of recorded absences of certain students.
6. Review District Impact Aid application to compare English Second Language (ESL) students to actual district enrollment.

Objective 1 Credit Card Usage

Petitioners were concerned about the possible misuse of a District credit card alleging that Superintendent Lockhart used the card for personal expenses and failed to reimburse the District.

A Citi credit card¹ was opened in July 2010 in the name of both the Talihina School and Jason Lockhart. Citi Bank Consumer Legal Operations indicated the account was a joint account with the District mutually liable. As of October 2023, the account was open, and the District remained liable on the account.



Credit card statements were mailed to Lockhart’s residence, and until February 2018, the District paid the majority of all account charges. After February 2018, the District stopped making payments on the credit card account and Lockhart paid the credit card bill directly and requested reimbursement for his travel and school related expenses.

Lockhart’s contracts for SY² 2016, SY 2017, and SY 2018 allowed for the reimbursement of school related expenses specifically “reimbursement for actual and documented itemized expenses incurred in the performance of his duties.”

(9) Reimbursement for School Related Expenses
 SUPRINTENDENT shall be entitled to reimbursement for actual and documented itemized expenses incurred in the performance of his duties.

Finding *Between January 1, 2016, and January 31, 2018, Lockhart incurred, and the District paid, \$58,387.12 in credit card charges. Of these charges, no receipts were provided for \$11,686.33 of expenses and no itemized receipts³ were provided for \$2,152.38 of expenses.*

Per Lockhart’s contract, expenses that were not documented or itemized should not have been reimbursed by the District. Without itemized receipts the personal or business nature of \$13,838.71 in charges could not be determined. The complete breakdown of credit card charges is provided in the table.

Breakdown of Credit Card Charges	
January 1, 2016, through January 31, 2018	
Classification	Amount
Allowable Charges	\$39,415.87
No Receipt Provided – Undetermined	\$11,686.33
Personal Expenses – Unallowable	\$2,152.57
Non-itemized Receipts	\$2,152.38
Vehicle Expenses – Unallowable	\$1,541.40
Interest and Fees	\$1,438.57
Total	\$58,387.12

¹ According to 2001 OK AG 30, a school district is allowed to use a credit card as a method of payment.

² SY – School Year, July 1 through June 30

³ Only a credit card charge slip was provided.

Personal Expenses

Finding *Superintendent Lockhart charged a total of \$2,152.57 in personal expenses on the District’s credit card that were paid with school funds. Improper charges totaling \$1,613.27 have not been repaid to the District.*

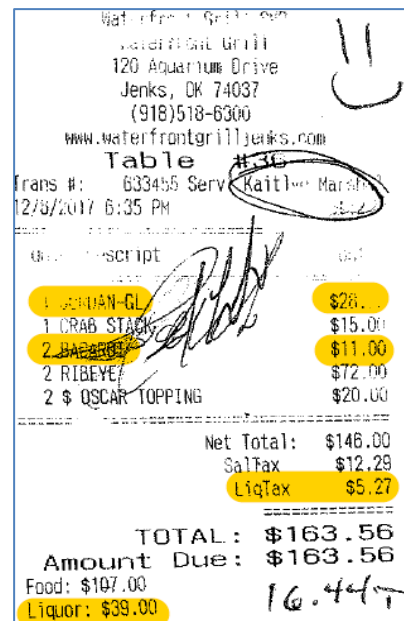
A listing of undocumented and/or potentially personal credit charges was presented to Lockhart with a request for him to provide supporting documentation and clarifications. Of the transactions submitted to Lockhart, he determined that unreimbursed personal charges to the District totaled \$539.30; Lockhart reimbursed the District for this amount on May 25, 2021.

After a review of all documentation presented, it was determined that a total of \$2,152.57 in expenses were personal in nature. After deducting the \$539.30 reimbursed by Lockhart, unpaid personal charges totaling \$1,613.27 remained. Of this amount, \$704.66 was for alcoholic beverages. Although not specifically addressed in the superintendent’s contract, reimbursement per the contract was limited to expenses incurred in the performance of official duties. In addition, school policy on “Purchases by Employees” states that reimbursements for alcoholic beverages are not allowed.

Three examples of amounts considered personal in nature are shown below.

Example 1

A charge was made on December 6, 2017, at Waterfront Grill in Jenks for two guests totaling \$180.00. Lockhart provided documentation that he attended an OASIS⁴ conference on the night of the meal. Although a meal would have been allowable, the \$44.27 charged for liquor and liquor tax should not have been reimbursed by the school.



Example 2

Lockhart and his spouse traveled to Washington, D.C. in April 2016 to attend NCIS⁵ related meetings. The trip, totaling \$2,891.48, included hotel stays, meals, and fuel, all allowable expenses. However, \$213.22 of this amount was spent on alcohol, a sightseeing tour, and personal items at Walmart. A one-night hotel stay during the trip totaled \$482.38⁶, although not considered a personal expense, this cost appeared excessive.⁷

⁴ Oklahoma Association Serving Impacted Schools

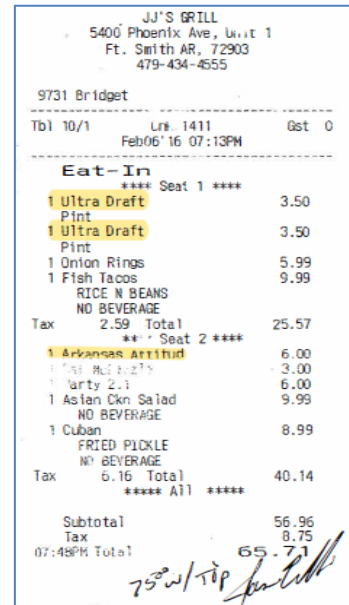
⁵ National Council for Impacted Schools

⁶ Room charges of \$359.00, plus fees and taxes of \$123.38.

⁷ See hotel receipt at Attachment 1.

Example 3

On Saturday, February 6, 2016, a charge for two people was incurred at JJ's Grill in Fort Smith, AR for \$75.00. This trip was not included on Lockhart's list of attended meetings and conferences and no school purpose was noted on the receipt. Per Lockhart, the trip was a "Basketball Game." The schedule provided by Lockhart did not include a basketball game on the night of February 6, 2016. The restaurant was in Fort Smith, AR, which would not have been a location for a Talihina game. The meal was for more than one person and included alcoholic beverages.



Automobile Expense

Lockhart's contracts for the SY 2016, SY 2017 and SY 2018 incorporated an allowance for automobile expenses, including a monthly payment of \$800, "one (1) set of (4) tires a year, and fuel for school related travel." Lockhart was responsible for "insurance, vehicle maintenance and all repairs."

Talihina Public Schools agrees to pay Jason Lockhart **\$800.00** a month and payable on July 1, 2016 and every month thereafter. Talihina Public Schools will pay for **one (1) set of (4) tires a year and fuel for school related travel.** Talihina Public School also agrees to provide supplemental liability insurance. Mr. Lockhart will be responsible for maintaining and reporting the proper documentation on his travel. He will also be responsible for **insurance, vehicle maintenance and all repairs on this vehicle.**

Finding *Between January 1, 2016, and January 31, 2018, the District paid \$1,541.40 of credit card charges incurred by Lockhart for vehicle maintenance and repairs. These costs were the responsibility of Lockhart and should not have been paid by the District.*

Costs charged for vehicle maintenance and repairs were presented to Lockhart as part of the request for supporting documentation and clarification. Lockhart responded that these charges were "Misunderstood to be provided" and the charges were not reimbursed to the District. Lockhart's contract was clear that "vehicle maintenance and all repairs" were his responsibility.

Example

A \$444.52 charge was made on January 21, 2017, for an oil change, battery replacement, and air filter all transactions that would be considered vehicle maintenance and repairs.

Customer Invoice 164364 01/21/2017	FIRESTONE COMPLETE AUTO CARE FORT SMITH 4901 ROGERS AVE FORT SMITH, AR. 72903-2005	Service Advisor: 01 ALEX 479.452.2238		
LOCKHART, JASON [REDACTED] TALIHINA, OK 74571-0445 [REDACTED]	2012 RAM 2500 SLT [GRAY] 6.7L L6 FI DIESEL VIN L OHV Lic #: [REDACTED] OK Vin #: [REDACTED] In: 01/21/17 5:04PM Mileage: [REDACTED] Out: 01/21/17 6:45PM			
Store # 029564	RETAIL SALE			
Description	Rev Hist	Unit	Extended	Job
	/Article # ID	Qty	Price	Total
COURTESY CHECK	01			
COURTESY CHECK	7046930 09TS	1	N/C	N/C
DIESEL OIL CHANGE	1 01			96.98
12.0 QTS. API- SAE 5W-40 Synthetic Engine Oil or SAE 15W-40 The Manufacturer recommends an Oil Change when an associated dash board indicator light is lit...See Owner's manual for specific requirements.				
15W-40 ROT TRIPLE PROTECTION OIL QT	7034324 09TN	12	7.00	84.00
DIESEL OIL CHANGE LABOR	7024104 09TS	1	5.00	5.00
USED OIL FILTER RECYCLING CHG (1)	7075051 09TN	1	2.99	2.99
AL3976A AL3976A AL SPIN-ON OIL	7029769 09TN	1	14.99	14.99
PRT-DISC Match Competitor Written Estimate	7001674 09T	-1	9.25	-9.25
LBR-DISC Match Competitor Written Estimate	7001674 09T	-1	0.75	-0.75
BATTERY REPLACEMENT	2 01			249.99
MTP94R/H7 INTERSTATE BATTERY	7005424 09TN	1	219.99	219.99
BATTERY CORE	7004413 09TN	1	10.00	10.00
PRT-DISC Battery Core 100% Discount	7039969 09TN	-1	10.00	-10.00
REMOVE & REPLACE BATTERY - ONE	7005394 09TS	1	30.00	30.00
AIR FILTER	3 01			55.99
SA10261 SA10261 STP AIR FILTER	7029785 09TN	1	55.99	55.99
AIR FILTER LABOR	7001062 09TS	1	N/C	N/C
Technician(s): 09 STEVE				
Payment History:				
MasterCard 3248	444.52	05279H		
Total Tendered	444.52			
			Summary:	
			Parts	365.72
			Labor	37.24
			Shop Supplies	2.07
			Sub-Total	405.03
			Tax (9.75%)	39.49
			Total	\$444.52
I have received the above goods and/or services. If this is a credit card purchase, I agree to pay and comply with my cardholder agreement with the issuer.				

Other Issues

- 1) Most meal charges incurred on the District's credit card included at least two guests, and at times more than two. The superintendent's contract did not specify whether reimbursable expenses were to include family and guests or only costs incurred by and for the superintendent were reimbursable.
- 2) Almost none of the credit card receipts presented included the school purpose for the charge or the individuals in attendance.
- 3) Although the superintendent is responsible for incurring the charges questioned in this report, the school board approved thousands of dollars in charges without proper supporting documentation.
- 4) The District did not have any policies and procedures governing credit card purchasing.

Objective 2 *Certifications, Salaries, and Nepotism*

Petitioners were concerned that some administrators and teachers did not hold the required certifications for their appointed positions and that nepotism was involved in hiring select personnel.

Certification

Finding *The District contracted with two teachers to serve in positions for which they were not properly certified.*

According to statute,⁸ it is unlawful for any board of education to enter into a contract with a teacher or administrator who does not hold valid certification with the State Department of Education (SDE). Of 68 employees reviewed, 2 were not properly certified for the positions held.

Employee 1

During School Year (SY) 2017 and SY 2018 Kelly Gravitt was paid as a principal and coded as such in the Oklahoma Cost Accounting System. SDE sent the District a letter on February 16, 2018, advising the Board that the employment of Gravitt in the position of principal had resulted in the District receiving an accreditation deficiency for SY 2018. The school responded by addressing the issue as a coding error. The coding for Gravitt was changed and the school's accreditation deficiency was removed.

Gravitt obtained emergency certification as a principal for SY 2019 and as of October 2023 he remains emergency certified.

Employee 2

Hailey Kirkes was employed as a pre-kindergarten through 12th grade health/physical education teacher from SY 2016 to SY 2018 but was only certified in biological sciences and agriculture education. As of October 2023, Kirkes holds the appropriate certifications.

In Summary

The District should verify that teachers are certified in their appropriate teaching or administrative field. Contracts should not be entered into until a certification is obtained. Authorizing or paying the salary of any teacher or administrator not holding a valid certification is considered a fraudulent expenditure of public funds.⁹

Nepotism

Talihina Public Schools consists of a small community of employees, some of which share family relationships with administrators or school board members. The petitioners were concerned nepotism had occurred and that preferential treatment had been shown because of these relationships.

⁸ 70 O.S. § 6-101(B), 6-107(A), and 6-108

⁹ 70 O.S. § 6-101(B), 6-107(A), and 6-108

Nepotism is governed by statute¹⁰ and is based on the relationship between a district employee and a member of the Board. The Board has the final vote in the hiring and contracting of school personnel. No school employees were identified with relationships to board members that would constitute nepotism as defined by statute.

No Finding *We found no evidence of nepotism.*

Objective 3 **Choctaw Summer School Program-POSSE**

The Choctaw Nation Partnership of Summer School Education (POSSE) works with local school districts within its tribal jurisdiction to provide a 24-day summer learning program for qualified kindergarten, 1st, 2nd, and 3rd grade students. Petitioners were concerned that POSSE program funds were mismanaged or spent on work not actually performed.

The POSSE program is student enrollment driven and the Choctaw Nation approves and fully funds the program based on a proposal submitted by the District. The District was awarded \$167,760.57 in POSSE grant funds for SY 2016, 2017, and 2018.

POSSE Program	
School Year	Amount Received
2016	\$58,964.86
2017	\$55,271.45
2018	\$53,524.26
Total	\$167,760.57

Personnel working for the program were paid by the District. The District did not maintain timesheets, schedules or other payroll reports tracking the time and work performed. The lack of record keeping prevented SA&I from verifying the time personnel worked with the program. However, there was no evidence the District paid employees more than the amount specified in the District's program proposal

Finding *The District paid employees working during the Choctaw Nation POSSE program without obtaining extra-duty contracts.*

All employment contracts are required to include itemized extra-duty or extracurricular costs.¹¹ The District did not obtain extra-duty contracts for employees working the POSSE program. District administration considered the program funds a grant, not state appropriations, and believed they were not required to obtain extra-duty contracts.

Despite the District's failure to maintain contracts for employees working the program, we found no evidence the funds provided by the Choctaw Nation for the summer school program were mismanaged.

Objective 4 **Expenditures**

It was alleged by petitioners that the District did not properly document bids for mowing services and issued payments to children or spouses of school personnel to avoid the withholding and payment of taxes.

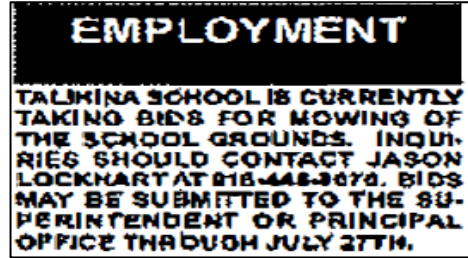
¹⁰ 70 O.S. § 5-113 and § 113.1

¹¹ 70 O.S. § 6-101.6

Mowing Contract

Finding **The District did not properly document the bid process when awarding a contract for mowing services to a District employee.**

On July 13, 2017, the District posted an ad in a local newspaper soliciting bids for mowing services. The Board’s meeting minutes from September 5, 2017, stated two mowing bids were received and that Kelly Gravitt, a school employee, was awarded the bid.



(10) Two Mowing Bids was received for the mowing of the School Campus. Motion made by Steve Woods, second by Scott Russell, to approve Kelly Gravitt’s bid. Vote: Brian Holland, yes, Steve Woods, yes, Leslie Crank, yes, Scott Russell, yes.

The District failed to maintain the bid documentation¹² and the minutes did not include sufficient information to verify the amounts for the two bids submitted. Due to the lack of documentation it could not be determined whether the District selected the lowest and/or best bid.

After Gravitt was awarded the bid, the Board and the superintendent approved a Use of School Equipment Policy and agreed that \$50 would be subtracted from each mowing payment. Without a copy of the bid documents, it could not be determined if the use of school equipment was a factor in determining the lowest and/or best bid.

(11) Motion made by Scott Russell, seconded by Leslie Crank, to approve a Use of School Equipment Policy. Vote: Brian Holland, yes, Steve Woods, yes, Leslie Crank, yes, Scott Russell, yes.

Three checks were issued to Gravitt for mowing between November 2017 and December 2019 totaling \$25,000.

Mowing Contract Payments			
School Year	Date of Check	Amount	Form 1099
2017 - 2018	11/07/2017	\$10,000	No
2018 - 2019	12/04/2018	\$9,000	Yes
2019 - 2020	12/05/2019	\$6,000	Yes
	Total	\$25,000	

The November 2017 payment was for mowing dates between March 4, 2017, and October 22, 2017.¹³ The mowing contract was not awarded to Gravitt until September 2017, resulting in six months of work being paid prior to the bid being awarded.

¹² 70 O.S. § 5-135; 51 O.S. § 24A.4

¹³ See purchase order and invoice at Attachment 3.

An IRS Form 1099 could not be provided for calendar year 2017. A Form 1099 totaling \$10,000 was issued for calendar year 2018, \$1,000 in excess of the \$9,000 payment. A Form 1099 totaling \$6,000 was issued in calendar year 2019.

Other Issue

Sometime approximate to December 2017, the then school board president requested from the bank a copy of a check he had signed on the school's bank account for payment of mowing costs to Gravitt.¹⁴ After the bank provided the copy, Lockhart wrote a letter¹⁵ to the bank restricting "ownership rights to all Talihina Public School accounts" to himself and Regina Cheatham, then board appointed school treasurer.

In January 2018, the bank notified the Board of Lockhart's request and stated that it was their understanding that a duly appointed authorized signer on an entity account can obtain a copy of a check written on that entity's account. The bank president notified the Board that Lockhart had directed them to limit access to bank records. The bank did not agree with Lockhart's request and the question was deferred back to the Board for a determination. Lockhart's attempt to limit access to the bank account was unsuccessful.

Payments to Family Members

The District sponsored sporting events and banquets throughout the school year which required services ranging from officiating to the preparation of meals. The individuals hired for these events were employees and/or their family members. The Activity Fund was used to pay for these services.

Finding *The District improperly paid employee family members for work performed by the employee. The payments were issued without an IRS Form 1099 provided to the worker of record.*

In at least six instances an employee's family member received payment for work performed, that based upon supporting documentation was actually performed by a school employee.

Example 1 - Gary Sigler, the spouse of school employee Sylvia Sigler, was paid for work that Sylvia performed. The payments were issued for various events throughout the school year and purchase orders were altered to indicate Gary performed the work when invoices indicated Sylvia was to be paid.

On January 27, 2016, a purchase order was issued to Gary after Sylvia's name was marked out. The attached invoice indicated Sylvia cooked for the "8th Grade Dinner."

¹⁴ See transaction at Attachment 3.

¹⁵ See Letter at Attachment 2.

Subacct. No. <u>8000 903</u>	ACTIVITY FUND	Purchase Order Number _____
Date <u>1-27-16</u> <u>7:19am</u>	PURCHASE ORDER	Cafeteria Invoice
	BOARD OF EDUCATIO Talihina School, District I Talihina, Oklahoma 745	
To (Vendor): <u>Sigler</u> <u>Sylvia</u>	Ship To: <u>Id</u>	Billed to: <u>8th Grade Dinner</u>
		Date: <u>1-26-2016</u>
		For: <u>COOK</u>
		Sylvia Sigler <u>80.00</u>

Quantity	Unit	Description	Unit Price	Amount
		<u>8th Grade Dinner</u>		<u>80 -</u>
		<u>Jan 26, 2016</u>		<u>80 -</u>
		<u>4:00 - 6:00 PM</u>		
			<u>per M. J.</u>	

Per Sylvia, she performed the work instead of her husband, but the school “does that so that they don’t take taxes.” Gary exceeded the \$600 income limit in CY 2017 but was not issued a Form 1099.

Individual’s performing work at District sponsored events should be paid accordingly. Payments should not be issued to family members to circumvent federal tax requirements. The IRS requires that a Form 1099 be issued to an individual earning at least \$600 for contract work in a calendar year.

Finding *The District failed to maintain adequate supporting documentation for all Activity Fund expenditures.*

Statute,¹⁶ along with standard operating procedures outlined by SDE, define that Activity Fund disbursements shall not be used for purposes other than that for which each extracurricular activity account was created and that any payments should be supported with properly itemized invoices.

Activity fund expenditures from January 1, 2016, through June 30, 2018, were sampled and reviewed for compliance with statutes. Thirty-three of the 119 activity fund expenditures reviewed did not contain itemized receipts, or the receipts presented did not accurately support the total amount paid. The unsupported expenditures totaled \$30,761.

A large portion of the questioned transactions were advance travel payments paid to activity sponsors for student meals and expenses. SDE policy states that advancements for travel will be issued in the name of the sponsor and itemized receipts and unused monies will be returned the first working day following a trip.

During a school trip each student would receive cash with no requirement to return the unused cash or itemized meal receipts to the trip sponsor. This resulted in the inability to determine if all funds had been properly accounted for.

¹⁶ 70 O.S. § 5-129; 51 O.S. § 24A.4

Objective 5 Weekend School

The District created an *Attendance Recovery Days* program during the spring semester of 2018. During this semester the District was operating on a four-day school week, Monday through Thursday. The purpose of the program was to help students who exceeded the maximum number of allowable absences during the 2017 fall semester/2018 spring semester to recover credit for instructional time.

The recovery days were held on three Fridays, while the rest of the District was out of school. No more than four students attended a single session.

Per Lockhart, the attendance program was considered authorized by SDE as part of the School Improvement Grant approval process. The Grant approval did include mention and funding for salary and benefits for “School Attendance Recovery Days.”

Benefits associated with
Salary/Stipend for
Summer School, Before
and After School
Tutoring, Test Prep Boot
Camp and/or School
Attendance Recovery
Days

No records could be provided documenting SDE’s specific approval of the program outside of the grant process and there was no evidence the Board approved the program. The program was discontinued after the spring 2018 semester.

Objective 6 Impact Aid & English Second Language Students


Petitioners alleged the District was reporting more English Second Language (ESL) students on their Federal Impact Aid application than were enrolled.

No Finding *The District was not required to report the number of English Second Language (ESL) students to receive Federal Impact Aid.*

Federal Impact Aid regulations are outlined in 20 USC 7701 and do not require schools to document the number of students that speak English as a second language. Instead, the regulations dictate the school should determine the number of children that reside on Federal property, reside on Tribal lands, had a parent on active duty, reside in low-rent housing, and other similar requirements.

The Director for the Impact Aid Program for the U.S. Department of Education stated that ESL status does not affect Impact Aid funding and would not influence the amount of Impact Aid funds received by the District.

Attachment 1



Mr. & Mrs. Jason Lockhart
 Talihina OK 74571
 US

Block Code

Printed On 04-15-16
 Group
 Company
 Page No. 1 of 1


Arrival 04-14-16
 Departure 04-15-16
 Room No. 6200
 Folio No.
 Cashier

Date	Description	Debit	Credit
04-14-16	Advance Deposit		359.00
04-14-16	Room Service Line# 6200 : CHECK# 1431	41.58	
04-14-16	Room Charge	359.00	
04-14-16	Historical Preservation Fund	23.34	
04-14-16	Occupancy Tax Room	10.77	
04-14-16	Sales Tax Room	22.94	
04-14-16	Resort Fee	39.00	
04-14-16	Sales Tax - Resort Fee	2.34	
04-15-16	Transportation/Valet Parking Line# 6200 : CHECK# 4279	24.99	
04-15-16	Room Service Line# 6200 : CHECK# 1436	86.76	
04-15-16	Bunker Tour Line# 6200 : CHECK# 8893	76.77	
04-15-16	MasterCard XX/XX XXXXXXXXXXXX3248		328.49
Balance Due		0.00	

Guest Signature

I agree to remain personally liable for the payment of this account if the corporation or other third party fails to pay part or all of these charges.

"Thank you for helping to preserve the history of The Greenbrier."



300 WEST MAIN STREET • WHITE SULPHUR SPRINGS, WEST VIRGINIA, 24986 • GREENBRIER.COM • 855-252-3767

Attachment 2



Talihina Public Schools

Post Office Box 38 • Talihina, Oklahoma 74571-0038
(918) 567-2259 • Fax (918) 567-3507
Jason Lockhart, Superintendent

Rec.
DEC 15 2017

December 15, 2017

To Whom it may concern:

re: Spiro State Bank, Talihina Branch release of records

From this date forward, ownership rights to all Talihina Public School accounts will be limited to Regina Cheatham, Board appointed school Treasurer, and Jason Lockhart, Board appointed CEO/Supt. of Talihina Schools. Signatory rights and access only imply the ability to sign checks and/or make deposits on behalf of Talihina Schools. No other access or rights are implied unless board action by the Talihina School Board of Education, in quorum, alters or directly issues these rights. Board minutes should be required documenting this action prior to access being given to any other individual.

According to the legal department at the Oklahoma State Bankers Association, the release of prior information to an individual acting as a representative of the Talihina BOE was a form of "Bank Fraud" where said person was acting individually and completely outside the role, responsibility, or authority granted by the Talihina BOE. After receiving this letter, any further release of information by the bank under the same authority would be a violation of customer privacy rights and could include legal action.

Sincerely,

Jason Lockhart
Supt. of Schools

Attachment 3

TALIHINA PUBLIC SCHOOL
 P.O. BOX 38
 TALIHINA, OK 74571
 (918) 567-2259 • FAX (918) 567-3507
 TAX ID NO. 730717755
REQUISITION FORM

DATE 10/24 | _____

VENDOR KELLY GRAVITT REQUISITION PROCEDURES

ADDRESS _____ Invoice 1

REQUESTED BY: [Signature] Date 10/24/2017

DATE REQUESTED: _____ To: Talihina Public School

FUND: GEN BLDG LIB FED

EXPENSE TYPE: SUPPLIES BOOKS EQUIP
 OP OF BLDG REPAIR UTILITIES OTHER

Kelly Gravitt for mowing from 34 times March 4 through October 22 @ \$250.00 total \$8500.00
 13 Mowing extra softball and baseball field and around school 13 times total \$1500.00

For a total of \$10,000 [Signature]

FY	FUND	PROJECT	FUNCT
		000	2630 4720
			050

ATTENTION: NO BACK ORDERS ACCEPTED

QUANTITY	ITEM AND DESCRIPTION	UNIT PRICE	TOTAL
34	MOWING / GROUNDS KEEPER MARCH 4 - OCT 22 @ \$250.00		\$8,500.00
13	MOWING EXTRA SOFTBALL & BASEBALL FIELDS & around school		\$1,500.00

THE BOARD OF EDUCATION
 TALIHINA PUBLIC SCHOOLS
 District 1-02
 LeFlore County, Oklahoma

TO THE TREASURER

BUILDING Series 2017-2018 11/07/2017 27 \$10,000.00

*****\$10,000 Dollars and 00 Cents

KELLY W. GRAVITT

TO THE ORDER OF

PAID THROUGH
 TALIHINA BRANCH, SOB
 TALIHINA, OKLAHOMA

TREASURER [Signature]
 CLERK [Signature]
 TREASURER [Signature]

TOTAL \$10,000.00

APPROVED BY [Signature]

ITEMS RECEIVED BY _____ DATE RECEIVED _____

DISCLAIMER

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