ANNUAL FINANCIAL REPORT

DEPENDENT SCHOOL DISTRICT NO. 54

JUSTICE PUBLIC SCHOOL DISTRICT

SEMINOLE COUNTY, OKLAHOMA

JULY 1, 2014 TO JUNE 30, 2015

JUSTICE PUBLIC SCHOOLS
DEPENDENT SCHOOL DISTRICT NO. 54
SEMINOLE, COUNTY
JUNE 30, 2015

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JUSTICE PUBLIC SCHOOLS
DEPENDENT SCHOOL DISTRICT NO. 54
SEMINOLE, COUNTY
JULY 1, 2014 TO JUNE 30, 2015

SCHOOL DISTRICT BOARD MEMBERS

Tony Potter (July 1, 2014 to April 21, 2015)
Ame Chambers (April 21, 2015 to June 30, 2015)
Lillie Avery
Cathy Madron

SUPERINTENDENT OF SCHOOL DISTRICT

Chris Bryan

CLERK OF THE BOARD

Lillie Avery

SCHOOL DISTRICT TREASURER

Keith Claybrook

PUTNAM & COMPANY, PLLC

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INDEPENDENT AUDITOR'S REPORT

March 7, 2016

The Honorable Board of Education
Justice School District No. 54
Seminole County, Oklahoma

Report on the Financial Statements

We have audited the accompanying combined fund type and account group financial statements-regulatory basis of Justice School District No. 54, Seminole County, Oklahoma, as of and for the year ended June 30, 2015, as listed in the table of contents.

Management's Responsibility for the Financial Statements

Management is responsible for the preparation and fair presentation of these financial statements in accordance with financial reporting provisions of the Oklahoma State Department of Education. Management is also responsible for the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error.

Auditor's Responsibility

Our responsibility is to express an opinion on these financial statements based on our audit. We conducted our audit in accordance with auditing standards generally accepted in the United States of America. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free of material misstatement.

An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the financial statements. The procedures selected depend on the auditor's judgment, including the assessment of the risks of material misstatement of the financial statements, whether due to fraud or error. In making those risk assessments, the auditor considers internal control relevant to the entity's preparation and fair presentation of the financial statements in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the entity's internal control. Accordingly, we express no such opinion. An Audit also includes evaluating the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluating their overall presentation of the financial statements.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion.

Basis for Adverse Opinion on U.S. Generally Accepted Accounting Principles

As discussed in Note 1, these financial statements were prepared by the District, on the basis of the financial reporting provisions of the Oklahoma State Department of Education, which is a basis of accounting other than accounting principles generally accepted in the United States of America, to comply with the requirements of the Oklahoma State Department of Education. The effects on the financial statements of the variances between the regulatory basis of accounting described in Note 1 and accounting principles generally accepted in the United States of America, although not reasonable determined, are presumed to be material.

Adverse Opinion of U.S. Generally Accepted Accounting Principles

In our opinion, because the significance of the matter discussed in the "Basis for Adverse Opinion on U.S. Generally Accepted Accounting Principles" paragraph, the financial statements referred to in the first paragraph do not present fairly, in accordance with accounting principles generally accepted in the United States of America, the financial position of the District as of June 30, 2015, the changes in its financial position, or, where applicable, its cash flows for the year then ended.

Basis for Qualified Opinion on Regulatory Basis of Accounting

In our opinion, except for the effects of the matters described in the "Basis for Qualified Opinion on Regulatory Basis of Accounting" paragraph, the financial statements referred to in the first paragraph present fairly, in all material respects, the assets, liabilities and fund balance arising from regulatory basis transactions of each fund type and account group of the District, as of June 30, 2015, and the revenues collected and expenditures paid and encumbered for the year then ended on the regulatory basis of accounting described in Note 1.

Other Matters

Our audit was conducted for the purpose of forming opinions on the financial statements that collectively comprise the District's basic financial statements. The combining statement – regulatory basis, are presented for purposes of additional analysis and are not a required part of the basic financial statements. The schedule of expenditures of federal awards is presented for purposes of additional analysis as required by the U.S. Office of Management and Budget Circular A-133, Audits of States, Local Governments, and Non-Profit Organizations, and is also not required part of the basic financial statements.

The combining statements – regulatory basis and the schedule of expenditures of federal awards are the responsibility of the management and were derived from and relate directly to the underlying accounting and other records used to prepare the basic financial statements. Such information has been subjected to the auditing procedures applied in the audit of the basic financial statements and certain additional procedures, including comparing and reconciling such information directly to the underlying accounting and other records used to prepare the basic financial statements or to the basic financial statements themselves, and the other additional procedures in accordance with auditing standards generally accepted in the United States of America. In our opinion, the combined statements – regulatory basis and the schedule of expenditures of federal awards are fairly stated in all material respects in relation to the basic financial statements as a whole.

Other Reporting Required by Government Auditing Standards

In accordance with Government Auditing Standards, we have also issued our report dated March 7, 2016 on our consideration of the District's internal control over financial reporting an on our tests of its compliance with certain provisions of laws, regulations, contracts and grant agreements and to other matters. The purpose of that report is to describe the scope of our testing of internal control over financial reporting and compliance and the results of that testing, and not to provide an opinion on the internal control over financial reporting or on compliance. That report is an integral part of an audit performed in accordance with Government Auditing Standards In considering the District's internal control over financial reporting and compliance.

Putnam & Company

Putnam & Company, PLLC

COMBINED FINANCIAL STATEMENTS

JUSTICE SCHOOL DISTRICT NO. 54
SEMINOLE COUNTY, OKLAHOMA
COMBINED STATEMENT OF ASSETS AND LIABILITIES
(ALL FUND TYPES AND ACCOUNT GROUPS) - REGULATORY BASIS
JUNE 30, 2015

	Governmental Fund Types		Fiduciary Fund Types	Totals
	General	Special Revenue	Trust and Agency	(Memorandum Only)
ASSETS				
Cash and Cash Equivalents	$356,111	1,531,686	39,633	1,927,430
Total Assets	$356,111	1,531,686	39,633	1,927,430
LIABILITIES				
Warrants Payable	$84,592	42,198	332	127,122
Reserved for Encumbrances				0
Total Liabilities	84,592	42,198	332	127,122
FUND EQUITY				
Fund Equity:				
Restricted for Building Purposes		1,441,285		1,441,285
Restricted for Co-op Purposes		48,203		48,203
Restricted for Child Nutrition Programs		0		0
Restricted for Student Activities			39,301	39,301
Restricted for Insurance Purposes			0	0
Unassigned	271,519			271,519
Total Fund Equity	271,519	1,489,488	39,301	1,800,308
Total Liabilities and Fund Equity	$356,111	1,531,686	39,633	1,927,430

The notes to the financial statements are an integral part of this statement.

JUSTICE SCHOOL DISTRICT NO. 54
SEMINOLE COUNTY, OKLAHOMA
COMBINED STATEMENT OF REVENUES, EXPENDITURES, AND CHANGES IN FUND BALANCE
ALL GOVERNMENTAL FUND TYPES AND SIMILAR TRUST FUNDS - REGULATORY BASIS
FOR THE YEAR ENDED JUNE 30, 2015

	Governmental Fund Types		Fiducuary Fund Types	Totals
	General	Special Revenue	Trust and Agency	(Memorandum Only)
REVENUES:				
Local Sources	$53,583	11,512	38,930	104,025
Intermediate Sources	23,969			23,969
State Sources	1,094,519	5,985		1,100,504
Federal Sources	646,167	80,939		727,106
Total Revenues Collected	1,818,238	98,436	38,930	1,955,604
EXPENDITURES:				
Instruction	1,181,676	28,668		1,210,344
Support Services	456,514	530,783		987,297
Operation of Non-Instructional Services	143,615	10,038	33,615	187,268
Other Outlays				0
Bank Charges				0
Total Expenditures	1,781,805	569,489	33,615	2,384,909
Revenues Over (Under) Expenditures	36,433	(471,053)	5,315	(429,305)
OTHER FINANCING SOURCES (USES):				
Transfer Among Funds	74,756		(74,756)	0
Return of Assets	5,196			5,196
Estopped Warrants	120			120
Total Other Financing Sources (Uses):	80,072	0	(74,756)	5,316
Revenue and Other Sources Over (Under) Expenditures and Other Uses	116,505	(471,053)	(69,441)	(423,989)
Fund Balance, Beginning of Year	155,014	1,960,541	108,742	2,224,297
Fund Balance, End of Year	$271,519	1,489,488	39,301	1,800,308

The notes to the financial statements are an integral part of this statement.

JUSTICE SCHOOL DISTRICT NO. 54
SEMINOLE COUNTY, OKLAHOMA
COMBINED STATEMENT OF REVENUES, EXPENDITURES, AND CHANGES IN FUND BALANCE
BUDGET AND ACTUAL - GENERAL FUND AND BUDGETED SPECIAL REVENUE FUNDS - REGULATORY BASIS
FOR THE YEAR ENDED JUNE 30, 2015

	General Fund				Special Revenue Funds		
	Original Budget	Final Budget	Actual	Variance Favorable (Unfavorable)	Final Budget	Actual	Variance Favorable (Unfavorable)
REVENUES:							
Local Sources	$38,830	38,830	53,583	14,753	5,546	11,512	5,966
Intermediate Sources	18,794	18,794	23,969	5,175			0
State Sources	1,047,636	1,047,636	1,094,519	46,883		5,985	5,985
Federal Sources	238,270	604,237	646,167	41,930	47,834	80,939	33,105
Total Revenues	1,343,530	1,709,497	1,818,238	108,741	53,380	98,436	45,056
EXPENDITURES :							
Instruction	898,415	1,264,382	1,181,676	82,706	11,480	28,668	(17,188)
Support Services	456,514	456,514	456,514	0	1,992,403	530,783	1,461,620
Non-Instructional Services	143,615	143,615	143,615	0	10,038	10,038	0
Total Expenditures	1,498,544	1,864,511	1,781,805	82,706	2,013,921	569,489	1,444,432
Revenues Over (Under) Expenditures	(155,014)	(155,014)	36,433	191,447	(1,960,541)	(471,053)	1,489,488
OTHER FINANCING SOURCES (USES):							
Transfer Among Funds			74,756	74,756			0
Return of Assets			5,196	5,196			0
Estopped Warrants			120	120			0
Total Other Financing Sources (Uses)	0	0	80,072	80,072	0	0	0
Revenue and Other Sources Over (Under) Expenditures and Other Uses	(155,014)	(155,014)	116,505	271,519	(1,960,541)	(471,053)	1,489,488
Fund Balance, Beginning of Year	155,014	155,014	155,014	0	1,960,541	1,960,541	0
Fund Balance, End of Year	$0	0	271,519	271,519	0	1,489,488	1,489,488

The notes to financial statements are an integral part of this statement.

NOTES TO FINANCIAL STATEMENTS

1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

The basic financial statements of the Justice Public Schools Independent District No. 54, Seminole County, Oklahoma (the "District") have been prepared in conformity with an other comprehensive basis of accounting as prescribed by the Oklahoma State Department of Education. The more significant of the District's accounting policies are described below.

A. Reporting Entity

The District is a corporate body for public purposes created under Title 70 of the Oklahoma statutes and accordingly is a separate entity for operating and financial reporting purposes.

The District is part of the public school system of Oklahoma under the general direction and control of the State Board of Education and is financially dependent on State of Oklahoma support. The general operating authority for the public school system is the Oklahoma School Code contained in Title 70, Oklahoma Statutes.

The governing body of the District is the Board of Education composed of elected members. The appointed superintendent is the executive officer of the District.

In evaluating how to define the district, for financial reporting purposes, management has considered all potential component units. The decision to include a potential component unit in the reporting entity was made by applying the criteria established by the Governmental Accounting Standards Board (GASB). The basic, but not the only, criterion for including a potential component unit within the reporting entity is the governing body's ability to exercise oversight responsibility. The most significant manifestation of this ability is financial interdependency. Other manifestations of the ability to exercise oversight responsibility include, but are not limited to, the selection of governing authority, the designation of management, the ability to significantly influence operations, and accountability for fiscal matters.

A second criterion used in evaluating potential component units is the scope of public service. Application of this criterion involves considering whether the activity benefits the District and/or its citizens, or whether the activity is conducted within the geographic boundaries of the District and is generally available to its patrons.

A third criterion used to evaluate potential component units for inclusion or exclusion from the reporting entity is the existence of special financing relationships, regardless of whether the District is able to exercise oversight responsibilities.

Based upon the application of these criteria, there are no potential component units included in the District's reporting entity.

B. Fund Accounting and Description of Funds

The District uses funds and account groups to report on its financial position and the results of its operations. Fund accounting is designed to demonstrate legal compliance and to aid financial management by segregating transactions related to certain district functions or activities.

B. Fund Accounting and Description of Funds – (continued)

A fund is a separate accounting entity with a self-balancing set of accounts. An account group, on the other hand, is a financial reporting device designed to provide accountability for certain assets and liabilities that are not recorded in the funds because they do not directly affect net expendable available financial resources.

Funds are classified into three categories: governmental, proprietary and fiduciary. Each category, in turn, is divided into separate "fund types."

Governmental Fund Types

Governmental funds are used to account for all or most of a government's general activities, including the collection and disbursement of earmarked monies (special revenue funds), the acquisition or construction of general fixed assets (capital projects funds), and the servicing of general long-term debt (debt service funds).

General Fund – The general fund is used to account for all financial transactions, except those required to be accounted for in another fund. Major revenue sources include state and local property taxes and state funding under the Foundation and Salary Incentive Aid program. Expenditures include all costs associated with the daily operations of the schools except for programs funded for building repairs and maintenance, school construction and debt service on bonds and other long-term debt. The general fund includes federal and state restricted monies that must be expended for specific programs.

Special Revenue Fund – The special revenue fund is the District's Building Fund. The Building Fund consists of monies derived from property taxes levied for the purpose of erecting, remodeling, or repairing buildings and for purchasing furniture and equipment.

The Child Nutrition Fund derives monies from State, Federal and local sources.

The Co-op Fund derives monies from State and Federal sources.

Debt Service Fund – The debt service fund is the District's Sinking Fund and is used to account for the accumulation of financial resources for the payment of general long-term debt principal, interest and related costs. The primary revenue sources are local property taxes levied specifically for debt service and interest earnings from temporary investments.

Capital Projects Fund – The capital projects fund is the District's Bond Fund and is used to account for the proceeds of bond sales to be used exclusively for acquiring school sites, constructing and equipping new school facilities, renovating existing facilities, and acquiring transportation equipment.

Fiduciary Fund Types

Fiduciary funds are used to account for assets held on behalf of outside parties, including other governments, or on behalf of other funds within the District. When these assets are held under the terms of a trust agreement, trust funds are used for their accounting and reporting. Agency funds generally are used to account for assets that the District holds on behalf of others as their agent and do not involve measurement of results of operations.

Agency Fund – The Agency fund is the School Activities fund, which is used to account for monies, collected principally through fundraising efforts of the students and District-sponsored groups. The administration is responsible, under the authority of the Board, of collecting, disbursing and accounting for these activity funds.

Account Groups

Account groups are not funds and consist of a self-balancing set of accounts used only to establish accounting control over long-term debt and general fixed assets not accounted for in proprietary funds.

General Long-Term Debt Account Group – This account group was established to account for all long-term debt of the District, which is offset by the amount available in the debt service fund and the amount to be provided in future years to complete retirement of the debt principal. It is also used to account for liabilities for compensated absences and early retirement incentives, which are to be paid from funds provided in future years.

General Fixed Asset Account Group – This account group is used to account for property, plant, and equipment of the school district. The District does not have the information necessary to include this group in its combined financial statements.

Memorandum Only – Total Column - The total column on the general purpose financial statements is captioned "memorandum only" to indicate that it is presented only to facilitate financial analysis. Data in this column does not present financial position, results of operations or cash flows in conformity with generally accepted accounting principles. Neither is such data comparable to a consolidation. Interfund eliminations have not been made in the aggregation of this data.

C. Basis of Accounting and Presentation

The District prepares its financial statements in a presentation format that is prescribed by the Oklahoma State Department of Education. This format is essentially the generally accepted form of presentation used by state and local governments prior to the effective date of GASB Statement No. 34, *Basic Financial Statements-Management's Discussion and Analysis-for State and Local Governments*. This format significantly differs from that required by GASB 34.

The basic financial statements are essentially prepared on a basis of cash receipts and disbursements modified as required by the regulations of the Oklahoma State Department of Education (OSDE) as follows:

- Encumbrances represented by purchase orders, contracts, and other commitments for the expenditure of monies and are recorded as expenditures when approved.
- Investments and inventories are recorded as assets when purchased.
- Capital assets in proprietary funds are recorded when acquired and depreciated over their useful lives.
- Warrants payable are recorded as liabilities when issued.
- Long-term debt is recorded when incurred.
- Accrued compensated absences are recorded as an expenditure and liability when the obligation is incurred.

C. Basis of Accounting and Presentation – (continued)

This regulatory basis of accounting differs from accounting principles generally accepted in the United States of America, which require revenues to be recognized when they become available and measurable, or when they are earned, and expenditures or expenses to be recognized when the related liabilities are incurred for governmental fund types; and, when revenues are earned and liabilities are incurred for proprietary fund types and trust funds.

D. Budgets and Budgetary Accounting

The District is required by state law to prepare an annual budget. A preliminary budget must be submitted to the Board of Education by December 31 for the fiscal year beginning the following July 1. If the preliminary budget requires an additional levy, the District must hold an election on the second Tuesday in February to approve the levy. If the preliminary budget does not require an additional levy, it becomes the legal budget. If an election is held and the taxes are approved, then the preliminary budget becomes the legal budget. If voters reject the additional taxes, the District must adopt a budget within the approved tax rate.

The District may upon approval by a majority of the electors of the District voting on the question make the ad valorem levy for emergency levy and local support levy permanent. Under current Oklahoma Statutes, a formal budget is required for all funds except for trust and agency funds. Budgets are presented for all funds that include the originally approved budgeted appropriations for expenditures and final budgeted appropriations as adjusted for supplemental appropriations and approved transfers between budget categories.

E. Assets, Liabilities, and Fund Equity

Cash and Cash Equivalents – For purposes of the statement of cash flows, the District considers all cash on hand, demand deposits, and highly liquid investments, with an original maturity of three months or less when purchased, to be cash and cash equivalents.

Investments – Investments consist of direct obligations of the United States Government and Agencies with maturities greater than three months when purchased. All investments are recorded at cost, which approximates market value.

Property Tax Revenues – The district is authorized by state law to levy property taxes, which consist of ad valorem taxes on real and personal property within the district. The county assessor, upon receipt of the certification of tax levies from the County Excise Board, extends the tax levies on the tax roll for submission to the County Treasurer prior to October 1. The county treasurer must commence tax collection within fifteen days of receipt of the tax rolls. The first half of taxes are due prior to January 1. The second half is due prior to April 1.

If the first payment is not made timely, the entire tax becomes due and payable on January 2. Second half taxes become delinquent on April 1 of the year following the year of assessment. If not paid by the following October 1, the property is offered for sale for the amount of taxes due. The owner has two years to redeem the property by paying the taxes and penalty owed. If at the end of two years the owner has not done so, the purchaser is issued a deed to the property.

E. Assets, Liabilities, and Fund Equity – (continued)

Inventories – The value of consumable inventories at June 30, 2015 is not material to the basic financial statements.

Capital Assets – The accounting treatment over capital assets (property, plant, and equipment) depends on whether the assets are used in governmental fund-type operations or proprietary fund-type operations. Fixed assets used in governmental fund-type operations (general fixed assets) are recorded for as capital outlay expenditures of the governmental fund-type upon acquisition and are recorded as property, plant, and equipment in the General Fixed Asset Account Group. Fixed assets used in proprietary fund-type operations are accounted for as property, plant, and equipment within the proprietary fund itself.

All fixed assets are valued at historical cost, or estimated cost if actual is unavailable, except for donated fixed assets, which are recorded at their estimated fair value at the date of donation.

Depreciation and accumulated depreciation are not reported against general fixed assets.

Compensated Absences – The district provides vacation and sick leave benefits in accordance with Oklahoma Statutes, which provides for annual sick leave and personal business days. Accrued vacation and sick leave benefits are not reflected in the financial statements because such statements are prepared on the regulatory basis of accounting. This practice differs from generally accepted accounting principles.

Vested or accumulated vacation leave that is expected to be liquidated with expendable available financial resources is reported as an expenditure and a fund liability of the governmental fund that will pay it. There are no amounts of vested or accumulated vacation leave that are not expected to be liquidated with expendable available financial resources.

Long-Term Debt – Long-term debt is recognized as a liability of a governmental fund when due or when resources have been accumulated in the debt service fund for payment early in the following year. For other long-term obligations, only that portion expected to be financed from expendable available financial resources is reported as a fund liability of a governmental fund. The remaining portion of such obligations is reported in the general long-term debt account group. Long-term liabilities expected to be financed from proprietary fund operations are accounted for in those funds.

Fund Balance – Fund balance represents the cash and investments not encumbered by purchase order, legal contracts, and outstanding warrants.

F. Revenue, Expenses, and Expenditures

State Revenues – Revenues from state sources for current operations are primarily governed by the state aid formula under the provisions of Article XVIII, Title 70, Oklahoma Statutes. The State Board of Education administers the allocation of state aid funds to school districts based on information accumulated from the districts.

F. Revenue, Expenses, and Expenditures – (continued)

After review and verification of reports and supporting documentation, the State Department of Education may adjust subsequent fiscal period allocations of money for prior year errors disclosed by review. Normally, such adjustments are treated as reductions or additions of revenue of the year when the adjustment is made.

The District receives revenue from the state to administer certain categorical educational programs. State Board of Education rules require that revenue earmarked for these programs be expended only for the program for which the money is provided. These rules also require that the money not expended as of the close of the fiscal year be carried forward into the following year to be expended for the same categorical programs. The State Department of Education requires that categorical educational program revenues be accounted for in the general fund.

Interfund Transactions – Quasi-external transactions are accounted for as revenues, expenditures or expenses. Transactions that constitute reimbursements to a fund or expenditures/expenses initially made from it that are properly applicable to another fund are recorded as expenditure/expenses in the fund that is reimbursed. All other interfund transactions, except quasi-external transactions and reimbursements, are reported as transfers.

2. DEPOSIT AND INVESTMENT RISKS

Custodial Credit Risk - The District's policy as it relates to custodial credit risk is to secure its uninsured deposits with collateral, valued at no more than market value, at least at a level of 100 percent of the uninsured deposits and accrued interest thereon. The investment policy and state law also limits acceptable collateral to U.S. Treasury and agency securities and direct debt obligations of the state, municipalities, counties, and school districts in the state of Oklahoma, surety bonds, and letters of credit. As required by Federal 12 U.S.C.A., Section 1823(e), all financial institutions pledging collateral to the District must have a written collateral agreement approved by the board of directors or loan committee.

At June 30, 2015, the District was not exposed to custodial credit as defined above.

Investment Credit Risk – The District's investment policy limits investments to those allowed in state law applicable to school districts as follows:

a. Direct obligations of the U.S. Government, its agencies and instrumentalities to which the full faith and credit of the U.S. Government is pledged, or obligations to the payment of which the full faith and credit of the State is pledged.

b. Certificates of deposit or savings accounts that are either insured or secured with acceptable collateral with in-state financial institutions, and fully insured certificates of deposit or savings accounts in out-of-state financial institutions.

Investment Credit Risk (continued) - Investment credit risk is the risk that an issuer or other counterparty to an investment will not fulfill its obligations. The District has no formal policy limiting investments based on credit rating, but discloses any such credit risk associated with their investments. Unless there is information to the contrary, obligations of the U.S. government or obligations explicitly guaranteed by the U.S. government are not considered to have credit risk and do not require disclosure of credit quality.

Investment Interest Rate Risk – Interest rate risk is the risk that changes in interest rates will adversely affect the fair value of an investment. The District's investment policy limits investments to those with a short-term maturities, as a means of managing exposure to fair value losses arising from increasing interest rates. The District discloses it exposure to interest rate risk by disclosing the maturity dates of its various investments.

Concentration of Investment Credit Risk – Exposure to concentration of credit risk is considered to exist when investments in any one issuer represent a significant percent of total investments of the District (any over 5 percent are disclosed). Investments issued or explicitly guaranteed by the U.S. government and investments in mutual funds, external investment pools, and other pooled investments are excluded from this consideration. The District's investment policy requires diversification of investments..

At June 30, 2015, the District had no concentration of credit risk as defined above.

3. INTERFUND RECEIVABLES AND PAYABLES

There were no Interfund receivables or payables at June 30, 2015.

4. GENERAL LONG-TERM DEBT

State statutes prohibit the District from becoming indebted in an amount exceeding the revenue to be received for any fiscal year without approval by the District's voters. Bond issues have been approved by the voters and issued by the District for various capital improvements. These bonds are required to be fully paid serially within 25 years from the date of issue.

General long-term debt of the District normally consists of bonds payable, obligations for compensated absences, early retirement incentive, and a capital lease. Debt service requirements for bonds are payable solely from fund balance and future revenues for the debt service fund.

5. EMPLOYEE RETIREMENT SYSTEM

Basis of Accounting

The System's financial statements are prepared in conformity with accounting principles generally accepted in the United States of America. The financial statements have also been prepared in compliance with the requirements of the Government Accounting Standards Board Statement No. 34.

The financial statements are prepared on the accrual basis of accounting, under which expenses are recorded when the liability is incurred, revenues are recorded in the accounting period they are earned and become measurable, and investment purchases and sales are recorded as of their trade dates. Member and employer contributions are recognized when due, pursuant to formal commitments. Benefits and refunds are recognized when due and payable.

The pension benefit obligation is a standardized disclosure measure of the present value of pension benefits. This pension valuation method reflects the present value of estimated pension benefits that will be paid in future years as a result of employee services performed to date and is adjusted for the effect of projected salary increases. Actuarial valuations are not performed on individual school districts. The nonfunded pension benefit obligation of the System, as determined as part of the latest actuarial valuation indicates a significant unfunded pension benefit obligation.

Funding Policy

A participant with five years of creditable service may retire with a normal retirement allowance at the age of sixty-two (62) or with reduced benefits as early as age fifty-five (55). The normal retirement allowance paid monthly for life and then to beneficiaries, if certain options are exercised, equals two percent of the average of the highest three earning years of contributory service multiplied by the number of years of credited service. A participant leaving employment before attaining retirement age, but completing ten years of service, may elect to vest his/her accumulated contributions and defer receipt of a retirement annuity until a later date. When a participant dies in active service and has completed ten years of credited service, the beneficiary is entitled to a death benefit of $18,000.00 and the participant's contributions plus interest. If the beneficiary is a surviving spouse, the surviving spouse may, in lieu of the death benefit elect to receive, subject to the surviving spousal options, the participant's retirement benefits accrued at the time of death. The contribution rates for the Districts, which are not actuarially determined, and its employees are established by statute and applied to the employee's earnings, plus employer-paid fringe benefits. Employers' contribution of applicable employee earnings was 9.5% through June 30, 2015.

5. EMPLOYEE RETIREMENT SYSTEM (CONTINUED)

Annual Pension Cost

	Total Payroll	District's Contribution
2014-15	$ 1,058,561.	$ 100,563.
2013-14	$ 984,507.	$ 93,529.
2012-13	$ 998,260.	$ 94,834.

6. CONTINGENCIES

Amounts received or receivable from grantor agencies are subject to audit and adjustment by grantor agencies. Any disallowed claims, including amounts already collected, may constitute a liability of the applicable funds. The amount, if any, of expenditures which may be disallowed by the grantor cannot be determined at this time, although the District expects such amounts, if any, to be immaterial.

The District is a defendant in various lawsuits. Although the outcome of these lawsuits is not presently determinable, the District believes the resolution of these matters will not have a material adverse effect on the financial condition of the District.

7. RISK MANAGEMENT AND LITIGATION

The District is exposed to various risks of loss related to torts, theft of, damage to, and destruction of assets, errors and omissions, injuries to employees, employees' health and life, and natural disasters. The District manages these various risks of loss through the purchase of commercial insurance. Management believes such coverage is sufficient to preclude any significant uninsured losses to the District. Settled claims have not exceeded this insurance coverage in any of the past three fiscal years.

8. SUBSEQUENT EVENTS

Subsequent events have been evaluated through March 7, 2016, which is the date the financial statements were issued.

OTHER SUPPLEMENTARY INFORMATION

JUSTICE SCHOOL DISTRICT NO. 54
SEMINOLE COUNTY, OKLAHOMA
COMBINING STATEMENT OF ASSETS AND LIABILITIES - REGULATORY BASIS
SPECIAL REVENUE FUNDS
JUNE 30, 2015

	BUILDING FUND	CO-OP FUND	CHILD NUTRITION FUND	TOTALS (Memorandum Only)
ASSETS				
Cash and Cash Equivalents	$1,482,677	49,009	0	1,531,686
Total Assets	$1,482,677	49,009	0	1,531,686
LIABILITIES AND FUND EQUITY				
Liabilities:				
Warrants Outstanding	$41,392	806		42,198
Reserved for Encumbrances				0
Total Liabilities	41,392	806	0	42,198
Fund Equity:				
Restricted for Building Purposes	1,441,285			1,441,285
Restricted for Co-op Purposes		48,203		48,203
Restricted for Child Nutrition Programs			0	0
Total Fund Equity	1,441,285	48,203	0	1,489,488
Total Liabilities and Fund Equity	$1,482,677	49,009	0	1,531,686

The notes to the financial statements are an integral part of this statement.

JUSTICE SCHOOL DISTRICT NO. 54
SEMINOLE COUNTY, OKLAHOMA
COMBINING STATEMENT OF REVENUES, EXPENDITURES
AND CHANGES IN FUND BALANCE - REGULATORY BASIS
SPECIAL REVENUE FUNDS
FOR THE YEAR ENDED JUNE 30, 2015

	BUILDING FUND	CO-OP FUND	CHILD NUTRITION FUND	TOTALS (Memorandum Only)
REVENUES				
District Sources	$11,264	248		11,512
State Sources		5,400	585	5,985
Federal Sources		71,665	9,274	80,939
Total Revenues	11,264	77,313	9,859	98,436
EXPENDITURES				
Instruction	28,668			28,668
Support Services	445,463	85,320		530,783
Operation of Non-Instruction Services			10,038	10,038
Total Expenditures	474,131	85,320	10,038	569,489
Revenues Over (Under) Expenditures	(462,867)	(8,007)	(179)	(471,053)
OTHER FINANCING SOURCES (USES):				
Estopped Warrants				0
Total Other Financing Sources (Uses):	0	0	0	0
Revenue and Other Sources Over (Under) Expenditures and Other Uses	(462,867)	(8,007)	(179)	(471,053)
Fund Balance, Beginning of Year	1,904,152	56,210	179	1,960,541
Fund Balance, End of Year	$1,441,285	48,203	0	1,489,488

The notes to the financial statements are an integral part of this statement.

JUSTICE SCHOOL DISTRICT NO. 54
SEMINOLE COUNTY, OKLAHOMA
COMBINED STATEMENT OF REVENUES, EXPENDITURES, AND CHANGES IN FUND BALANCE
BUDGET AND ACTUAL - BUDGETED SPECIAL REVENUE FUNDS - REGULATORY BASIS
FOR THE YEAR ENDED JUNE 30, 2015

	Building Fund			Coop Fund			Child Nutrition Fund		
	Original/ Final Budget	Actual	Variance Favorable (Unfavorable)	Original/ Final Budget	Actual	Variance Favorable (Unfavorable)	Original/ Final Budget	Actual	Variance Favorable (Unfavorable)
REVENUES:									
Local Sources	$5,546	11,264	5,718		248	248			0
State Sources			0		5,400	5,400		585	585
Federal Sources			0	37,975	71,665	33,690	9,859	9,274	(585)
Total Revenues	5,546	11,264	5,718	37,975	77,313	39,338	9,859	9,859	0
EXPENDITURES :									
Instruction	11,480	28,668	(17,188)			0			0
Support Services	1,898,218	445,463	1,452,755	94,185	85,320	8,865			0
Operation of Non-Instructional Services			0			0	10,038	10,038	0
Total Expenditures	1,909,698	474,131	1,435,567	94,185	85,320	8,865	10,038	10,038	0
Revenues Over (Under) Expenditures	(1,904,152)	(462,867)	1,441,285	(56,210)	(8,007)	48,203	(179)	(179)	0
OTHER FINANCING SOURCES (USES):									
Estopped Warrant			0			0			0
Total Other Financing Sources (Uses)	0	0	0	0	0	0	0	0	0
Revenue and Other Sources Over (Under) Expenditures and Other Uses	(1,904,152)	(462,867)	1,441,285	(56,210)	(8,007)	48,203	(179)	(179)	0
Fund Balance, Beginning of Year	1,904,152	1,904,152	0	56,210	56,210	0	179	179	0
Fund Balance, End of Year	$0	1,441,285	1,441,285	0	48,203	48,203	0	0	0

The notes to financial statements are an integral part of this statement.

JUSTICE SCHOOL DISTRICT NO. 54
SEMINOLE COUNTY, OKLAHOMA
COMBINING STATEMENT OF ASSETS AND LIABILITIES
TRUST AND AGENCY FUNDS - REGULATORY BASIS
JUNE 30, 2015

	ACTIVITY FUND	INSURANCE FUND	TOTALS (Memorandum Only)
ASSETS			
Cash and Cash Equivalents	$39,633	0	39,633
Total Assets	$39,633	0	39,633
LIABILITIES AND FUND EQUITY			
Liabilities:			
Warrants Outstanding	332		332
Reserved for Encumbrances			0
Total Liabilities	332	0	332
Fund Equity:			
Restricted for Student Activities	39,301		39,301
Restricted for Insurance Purposes		0	0
Total Fund Equity	39,301	0	39,301
Total Liabilities and Fund Equity	$39,633	0	39,633

The notes to the financial statements are an integral part of this statement.

JUSTICE SCHOOL DISTRICT NO. 54
SEMINOLE COUNTY, OKLAHOMA
COMBINING STATEMENT OF REVENUES, EXPENDITURES
AND CHANGES IN FUND BALANCE - REGULATORY BASIS
TRUST AND AGENCY FUNDS
FOR THE YEAR ENDED JUNE 30, 2015

	ACTIVITY FUND	INSURANCE FUND	TOTALS (Memorandum Only)
REVENUES			
District Sources	$38,930		38,930
Total Revenues	38,930	0	38,930
EXPENDITURES			
Operation of Non-Instruction Services	33,615		33,615
Total Expenditures	33,615	0	33,615
Revenues Over (Under) Expenditures	5,315	0	5,315
OTHER FINANCING SOURCES (USES):			
Transfer Among Funds		(74,756)	(74,756)
Total Other Financing Sources (Uses):	0	(74,756)	(74,756)
Revenue and Other Sources Over (Under) Expenditures and Other Uses	5,315	(74,756)	(69,441)
Fund Balance, Beginning of Year	33,986	74,756	108,742
Fund Balance, End of Year	$39,301	0	39,301

The notes to the financial statements are an integral part of this statement.

JUSTICE PUBLIC SCHOOLS DISTRICT NO. 54
SEMINOLE COUNTY, OKLAHOMA
COMBINING STATEMENT OF CHANGES IN ASSETS AND LIABILITIES -
REGULATORY BASIS - ACTIVITY FUND
JULY 1, 2014 TO JUNE 30, 2015

	Balance 07/01/14	Deposited	Transfers	Disbursed	Balance 06/30/15
Concession	$26,460.66	15,949.17		16,386.13	26,023.70
Pre-K	0.00	0.00		0.00	0.00
Athletics	4,379.61	16,934.50		12,853.91	8,460.20
Staff Account	1,008.79	0.00		201.50	807.29
Library	17.06	2,187.80		719.75	1,485.11
Petty Cash	0.00	0.00		0.00	0.00
JOM Parent Committee	255.28	2,897.50		2,533.50	619.28
Student Cou ncil	1,864.50	961.00		920.00	1,905.50
TOTALS	$33,985.90	38,929.97	0.00	33,614.79	39,301.08

The notes to the financial statements are an integral part of this statement.

JUSTICE SCHOOL DISTRICT NO. 57
SEMINOLE COUNTY, OKLAHOMA
SCHEDULE OF FEDERAL FINANCIAL ASSISTANCE
FOR THE YEAR ENDED JUNE 30, 2015

	Project Code	Federal CFDA Number	Program or Award Amount	Cash/ Beginning Balance at July 1, 2014	Federal Receipts	Federal Expenditures Direct Costs	Federal Expenditures Indirect Costs	Cash/ Ending Balance at June 30, 2015
Direct Funding:								
Title IX Indian Education	561	84.060	$22,367.00		22,367.00	22,256.00		111.00
Sub-total			22,367.00	0.00	22,367.00	22,256.00	0.00	111.00
Impact Aid	591	84.041	212,467.29		212,467.29	158,881.52		53,585.77
Sub-total			212,467.29	0.00	212,467.29	158,881.52	0.00	53,585.77
REAP	588	84.358B	17,020.00		17,020.00	17,020.00		0.00
Sub-total			17,020.00	0.00	17,020.00	17,020.00	0.00	0.00
U.S. Department of Education:								
Passed through the Department of Education:								
Title I	511	84.010	67,815.86		67,815.86	63,845.00	3,970.86	0.00
Title I - Prior Year	799	84.010		(391.46)	391.46			0.00
Title I - School Improvement	515	84.010	480.95		480.95	480.95		0.00
Title I - School Improvement - Prior Year	799	84.010		(10,308.75)	10,308.75			0.00
Title I Cluster			68,296.81	(10,700.21)	78,997.02	64,325.95	3,970.86	0.00
Title II, Part A - REAP	586	84.367	6,587.16		6,587.16	6,200.28	386.88	0.00
Title II Cluster			6,587.16	0.00	6,587.16	6,200.28	386.88	0.00
21st Century	553	84.287	244,562.30		114,113.05	244,562.30		(130,449.25)
21st Century - Prior Year	799	84.287		(56,135.58)	56,135.58			0.00
21st Century Cluster			244,562.30	(56,135.58)	170,248.63	244,562.30	0.00	(130,449.25)
IDEA-B Flow Through	621	84.027	71,665.00		71,665.00	71,665.00		0.00
Special Education Cluster			71,665.00	0.00	71,665.00	71,665.00	0.00	0.00
Other Federal Assistance								
Johnson O'Malley	563	15.130	7,367.50		7,367.50	5,894.00		1,473.50
Sub-total			7,367.50	0.00	7,367.50	5,894.00	0.00	1,473.50
U.S. Department of Agriculture:								
Passed Through the State Department of Education								
Food Service Programs - Lunches	763	10.555	85,666.52		85,666.52	85,666.52		0.00
Food Service Programs - Breakfasts	764	10.553	47,884.53		47,884.53	47,884.53		0.00
Summer Food	766	10.559	8,563.46		0.00			0.00
Summer Food - Prior Year	799	10.559		(6,835.09)	6,835.09	8,563.46		(8,563.46)
USDA Donated Food	385	10.550	8,908.55		8,908.55	8,908.55		0.00
Child Nutrition Cluster			151,023.06	(6,835.09)	149,294.69	151,023.06	0.00	(8,563.46)
Total Federal Assistance			$801,356.12	(73,670.88)	736,014.29	741,828.11	4,357.74	(83,842.44)

Note A: Basis of Presentation - The Schedule of Expenditures of Federal Awards includes the federal grant activity of the Justice Public Schools District and is presented on another comprehensive basis of accounting conforming with the accounting practices prescribed or permitted by the Oklahoma State Department of Education which is a comprehensive basis of accounting other than generally accepted accounting principles. Under this method, expenditures are recognized when an approved purchase order is issued.

Note B: Commodities representing non-cash expenditures have been included in the Schedule of Federal Awards which is an exception to the prescribed basis of accounting.

Note C: Federal expenditures reported above were chargeable to the respective Federal programs, however, in some instances, they may not be identical to amounts recorded under the specific OCAS project codes in the District's accounting records. Common reasons for those variances include: (1) timing differences, (2) differences in basis of accounting utilized, (3) mis-coding to other project codes, (4) refunds or reimbursements that offset expenditure data, (5) matching (or other local) expenditures that supplement or exceed Federal awarded amounts, and (6) approved indirect costs which are recorded under separate project codes.

The notes to the financial statements are an integral part of this statement.

JUSTICE SCHOOL DISTRICT NO. 54
SEMINOLE COUNTY, OKLAHOMA
SCHEDULE OF STATUTORY, FIDELITY, AND HONESTY BONDS
FOR THE YEAR ENDED JUNE 30, 2015

Keith Claybrook – Treasurer
Employee Dishonesty Bond
Western Surety Bond – Bond No. 70767216
$100,000 Limit
Effective July 1, 2014 to June 30, 2015

Encumbrance, Minutes Clerk, & Deputy Minutes Clerk
Employee Dishonesty Bond
Western Surety Bond – Bond No. 70767216
$100,000 Limit
Effective July 1, 2014 to June 30, 2015

Chris Bryan - Superintendent
Employee Dishonesty Bond
Western Surety Bond – Bond No. 70767216
$100,000 Limit
Effective July 1, 2014 to June 30, 2015

Activity Fund Custodian
Employee Dishonesty Bond
Western Surety Bond – Bond No. 70767216
$100,000 Limit
Effective July 1, 2014 to June 30, 2015

Prinicipal
Employee Dishonesty Bond
Western Surety Bond – Bond No. 70767216
$100,000 Limit
Effective July 1, 2014 to June 30, 2015

INTERNAL CONTROL AND COMPLIANCE REPORTS

PUTNAM & COMPANY, PLLC
Certified Public Accountants
169 S.E. 32ND
EDMOND, OKLAHOMA 73013
(405) 348-3800
Fax (405) 348-3846

Independent Auditor's Report on Internal Control Over Financial Reporting
and on Compliance and Other Matters Based on an Audit of Financial Statements
Performed in Accordance with *Government Auditing Standards*

March 7, 2016

The Honorable Board of Education
Justice School District No. 54
Seminole County, Oklahoma

We have audited in accordance with auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in Government Auditing Standards, issued by the Comptroller General of the United States, the accompanying fund type and account group financial statements-regulatory basis within the combined financial statement of Justice School District No. 54, Seminole County, Oklahoma as listed in the Table of Contents, as of and for the year ended June 30, 2015, and the related notes to the financial statements, which collectively comprise the District's financial statements, and have issued our report thereon dated March 7, 2016, which was adverse with respect to the presentation of the financial statements in conformity with accounting principles generally accepted in United States because the presentation followed the regulatory basis of accounting for Oklahoma school districts and did not conform to the presentation requirements of the Governmental Accounting Standards Board. However, our report was qualified for the omission of general fixed asset account groups with respect to the presentation of financial statements on the regulatory basis of accounting authorized by the Oklahoma State Board of Education.

Internal Control Over Financial Reporting

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

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

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

Compliance and Other Matters

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

Purpose of this Report

The purpose of this report is solely to describe the scope of our testing of internal control and compliance and the results of that testing, and not to provide an opinion on the effectiveness of the entity's internal control or on compliance. This report is an integral part of an audit performed in accordance with Government Auditing Standards in considering the entity's internal control and compliance. Accordingly, this communication is not suitable for any other purpose.

Putnam & Company

Putnam & Company, PLLC

PUTNAM & COMPANY, PLLC
Certified Public Accountants
169 E. 32ND
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(405) 348-3800
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Independent Auditor's Report on Compliance for Each Major Program
and on Internal Controls over Compliance In Accordance with
Office of Management and Budget Circular A-133

March 7, 2016

The Honorable Board of Education
Justice School District No. 54
Seminole County, Oklahoma

Report on Compliance for Each Major Federal Program

We have audited Justice School District No. 54, Seminole County, Oklahoma, compliance with the types of compliance requirements described in the OMB Circular A-133 compliance Supplement that could have a direct material effect on each of the District's major federal programs for the year ended June 30, 2015. The District's major federal programs are identified in the summary of auditor's results section of the accompanying schedule of findings and questioned costs.

Management's Responsibility

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

Auditor's Responsibility

Our responsibility is to express an opinion on compliance for each of the district's major federal programs based on our audit of the types of compliance requirements referred to above.

We conducted our audit of compliance in accordance with auditing standards generally accepted in the United States of America; the standards applicable to financial audits contained in *Government Auditing Standards,* issued by the Comptroller General of the United States; and OMB Circular A-133, require that we plan and perform the audit to obtain reasonable assurance about whether noncompliance with the types of compliance requirements referred to above that could have a direct and material effect on a major federal program occurred. An audit includes examining, on a test basis, evidence about the District's compliance with those requirements and performing such other procedures as we considered necessary in the circumstances.

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

Opinion on Each Major Federal Program

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

Report on Internal Control Over Compliance

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

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

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

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

Putnam & Company

Putnam & Company, PLLC

SCHEDULE OF FINDINGS AND QUESTIONED COSTS

JUSTICE SCHOOL DISTRICT NO. 54
SEMINOLE COUNTY, OKLAHOMA
SCHEDULE OF FINDINGS AND QUESTIONED COSTS
FOR THE YEAR ENDED JUNE 30, 2015

Section I – Summary of Auditors' Results

Financial Statements

Type of auditors' report issued: Qualified due to regulatory basis presentation.

Internal control over financial reporting:
* Material weakness(es) identified? _____ Yes __X__ No
* Significant Deficiency(ies) identified not considered to be material weakness(es)? _____ Yes __X__ None Reported

Noncompliance material to financial statement noted? _____ Yes __X__ No

Federal Awards

Internal control over major programs:
* Material weakness(es) identified? _____ Yes __X__ No
* Significant Deficiency(ies) identified not considered to be material weakness(es)? _____ Yes __X__ None Reported

Type of auditors' report issued on compliance for Major programs: Unqualified

Any audit findings disclosed that are required to be reported in accordance with section 510 (a) of OMB Circular A-133? _____ Yes __X__ No

Identification of major programs:

CFDA Number	Name of Federal Program
84.287	21st Century
10.550, 10.553, 10.555, 10.559	Food Service

Dollar threshold used to distinguish between type A and type B programs $300,000

Auditee qualified as low-risk auditee? _____ Yes __X__ No

JUSTICE SCHOOL DISTRICT NO. 54
SEMINOLE COUNTY, OKLAHOMA
SCHEDULE OF FINDINGS AND QUESTIONED COSTS
FOR THE YEAR ENDED JUNE 30, 2015

Section II – Findings Relating to the Financial Statements

None

Section III – Findings and Questioned Costs for Federal Awards

N/A

Section IV – Status of Prior Year Audit Findings

None related to the financial statements or questioned costs for federal awards.

Section V – Management's Corrective Action Plan

N/A

ACCOUNTANT'S PROFESSIONAL LIABILITY INSURANCE AFFIDAVIT

Justice School District No. 54
Seminole County, Oklahoma

Schedule of Accountants' Professional Liability Insurance Affidavit
For the Year Ending June 30, 2015

STATE OF OKLAHOMA)
) ss
County of Oklahoma)

The undersigned auditing firm of lawful age, being first duly sworn on oath, says that said firm had in full force and effect Accountant's Professional Liability Insurance in Accordance with the "Oklahoma Public School Audit law" at the time of audit contract and during the entire audit engagement with Justice School District No. 54 for the audit year 2014-2015.

Putnam & Company, PLLC

JV Putnam CPA

Subscribed and sworn to before me on this 7th day of March, 2016.
My commission expires on 4th day of June, 2019.

Amy Ziemba

Notary Public
Commission No. 03003504

NOTARY SEAL PUBLIC
AMY ZIEMBA
Notary Public in and for the
State of Oklahoma
Commission #03003504
My Commission expires 6/04/2019

MANAGEMENT LETTER AND COMMENTS

PUTNAM & COMPANY, PLLC
Certified Public Accountants
169 S.E. 32ND
EDMOND, OKLAHOMA 73013
(405) 348-3800
Fax (405) 348-3846

March 7, 2016

The Honorable Board of Education
Justice School District No. 54
Seminole County, Oklahoma

We have audited financial statements of Justice School District No. 54, Seminole County, Oklahoma, as of and for the year ended June 30, 2015, as listed in the table of contents, and have issued our report thereon dated March 7, 2016. As a part of our audit, we made a study and evaluation of the District's system of internal accounting control to the extent we considered necessary solely to determine the nature, timing and extent of our auditing procedures. Our study and evaluation was more limited than would be necessary to express an opinion on the system of internal accounting control taken as a whole, and we do not express such an opinion.

However, during our audit we became aware of some matters that, while not involving material weaknesses in internal accounting control, are opportunities for strengthening internal controls and operating efficiency. The memorandum that accompanies this letter summarizes our comments and suggestions regarding those matters. This letter does not affect our report dated March 7, 2016 on the financial statements of Justice School District No. 54.

We will review the status of these comments during our next audit engagement. We would be pleased to discuss these comments in further detail at your convenience, to perform any additional study of these matters or to assist you in implementing the recommendations.

We also wish to express our appreciation of the courteous attention and cooperation which we received from staff members during our engagement.

Sincerely,

Jerry W. Putnam

JUSTICE SCHOOL DISTRICT NO. 54
SEMINOLE COUNTY, OKLAHOMA
MANAGEMENT LETTER COMMENTS
FOR THE YEAR ENDED JUNE 30, 2015

PRIOR YEAR'S COMMENTS AND RECOMMENDATIONS

The prior year's comments have been addressed and resolved.

CURRENT YEAR'S COMMENTS AND RECOMMENDATIONS

Our review of the purchase orders indicated that in almost every instance the purchase orders were properly approved and supported with adequate documentation. However, we noted the following during our review:

Findings	No. of Instances
Did Not Sign for Goods/Services	7
Inaccurate Math	1
Incomplete Documentation	5
Paid From a Vendor's Statement	1
Paid Sales Tax	2
Purchase Order Not Available for Review	2
Invoice was Altered (Changed Amount of Invoice)	1

REVIEW OF ACTIVITY FUND TRANSACTIONS

We noted the following problems during our review of Activity Fund transactions:

Findings	No. of Instances
Incomplete Documentation	3

DISTRICT'S RESPONSE TO AUDIT COMMENTS/CORRECTIVE ACTION PLAN

The District is generally in agreement with the finding and recommendations above and will review current procedures in order to implement necessary changes.