

ANNUAL FINANCIAL REPORT
DEPENDENT SCHOOL DISTRICT NO. 54
JUSTICE PUBLIC SCHOOL DISTRICT
SEMINOLE COUNTY, OKLAHOMA
JULY 1, 2013 TO JUNE 30, 2014

JUSTICE PUBLIC SCHOOLS
DEPENDENT SCHOOL DISTRICT NO. 54
SEMINOLE, COUNTY
JUNE 30, 2014

TABLE OF CONTENTS

INDEPENDENT AUDITOR'S REPORT

COMBINED FINANCIAL STATEMENTS

- Combined Statement of Assets, Liabilities, and Equity – Regulatory Basis
All Fund Types and Account Groups
- Combined Statement of Revenues Collected, Expenditures Paid, and Changes in Fund Balances – Regulatory Basis – All Governmental Fund Types
- Combined Statement of Revenues, Expenditures and Changes in Fund Balances – Budget and Actual – Regulatory Basis – Budgeted Governmental Fund Types
- Notes to Combined Financial Statements

OTHER SUPPLEMENTARY INFORMATION

- Combining Statements of Assets, Liabilities, and Fund Balances – Regulatory Basis—All Special Revenue Funds
- Combining Statements of Revenues Collected, Expenditures Paid, and Changes in Fund Balances – Regulatory Basis – All Special Revenue Funds
- Combining Statement of Revenues, Expenditures, and Changes in Fund Balances- Budget and Actual – Regulatory Basis – All Special Revenue Funds
- Combining Statements of Assets, Liabilities, and Fund Balances – Regulatory Basis—All Capital Project Funds
- Combining Statements of Revenues Collected, Expenditures Paid, and Changes in Fund Balances – Regulatory Basis – All Capital Project Funds
- Combining Statement of Changes in Cash Balances – Regulatory Basis – Activity Funds
- Supporting Schedules
 - Schedule of Federal Awards Expended
 - Statutory, Fidelity, and Honesty Bonds

INTERNAL CONTROL AND COMPLIANCE REPORTS

- Report on the Internal Control and Compliance over Financial Reporting in Accordance with Government Auditing Standards
- Single Audit Report on Internal Control and Compliance over Major Federal Programs

SCHEDULE OF FINDINGS AND QUESTIONED COSTS

ACCOUNTANTS' PROFESSIONAL LIABILITY INSURANCE AFFIDAVIT

MANAGEMENT LETTER COMMENTS/ MANAGEMENT'S RESPONSE

JUSTICE PUBLIC SCHOOLS
DEPENDENT SCHOOL DISTRICT NO. 54
SEMINOLE, COUNTY
JULY 1, 2013 TO JUNE 30, 2014

SCHOOL DISTRICT BOARD MEMBERS

Tony Potter
Lillie Avery
Cathy Madron

SUPERINTENDENT OF SCHOOL DISTRICT

Chris Bryan

CLERK OF THE BOARD

Tony Potter

SCHOOL DISTRICT TREASURER

Keith Claybrook

PUTNAM & COMPANY, PLLC

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INDEPENDENT AUDITOR'S REPORT

February 26, 2015

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, 2014, 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, 2014, 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, 2014, 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 February 26, 2015 on our consideration of the District’s internal control over financial reporting and 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, 2014**

	Governmental Fund Types		Fiduciary Fund Types	Totals
	General	Special Revenue	Trust and Agency	(Memorandum Only)
<u>ASSETS</u>				
Cash and Cash Equivalents	\$223,807	1,974,202	110,287	2,308,296
Total Assets	\$223,807	1,974,202	110,287	2,308,296
<u>LIABILITIES</u>				
Warrants Payable	\$68,793	13,661	1,545	83,999
Total Liabilities	68,793	13,661	1,545	83,999
<u>FUND EQUITY</u>				
Fund Equity:				
Reserved for Encumbrances				0
Fund Balance	155,014	1,960,541	108,742	2,224,297
Total Fund Equity	155,014	1,960,541	108,742	2,224,297
Total Liabilities and Fund Equity	\$223,807	1,974,202	110,287	2,308,296

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, 2014**

	Governmental Fund Types		Fiduciary Fund Types	Totals
	General	Special Revenue	Trust and Agency	(Memorandum Only)
REVENUES:				
Local Sources	\$56,128	18,816	25,283	100,227
Intermediate Sources	20,882			20,882
State Sources	1,044,698	17,160		1,061,858
Federal Sources	566,627	513,065		1,079,692
Total Revenues Collected	1,688,335	549,041	25,283	2,262,659
EXPENDITURES:				
Instruction	1,162,578	22,874		1,185,452
Support Services	774,448	493,341		1,267,789
Operation of Non-Instructional Services	6,456	171,540	40,260	218,256
Other Outlays	109			109
Bank Charges		1,975		1,975
Total Expenditures	1,943,591	689,730	40,260	2,673,581
Revenues Over (Under) Expenditures	(255,256)	(140,689)	(14,977)	(410,922)
OTHER FINANCING SOURCES (USES):				
Return of Assets	90			90
Estopped Warrants	400			400
Total Other Financing Sources (Uses):	490	0	0	490
Revenue and Other Sources Over (Under) Expenditures and Other Uses	(254,766)	(140,689)	(14,977)	(410,432)
Fund Balance, Beginning of Year	409,780	2,101,230	123,719	2,634,729
Fund Balance, End of Year	<u>\$155,014</u>	<u>1,960,541</u>	<u>108,742</u>	<u>2,224,297</u>

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, 2014**

	General Fund				Special Revenue Funds			
	Original Budget	Final Budget	Actual	Variance Favorable (Unfavorable)	Original Budget	Final Budget	Actual	Variance Favorable (Unfavorable)
REVENUES:								
Local Sources	\$36,471	36,471	56,128	19,657	5,209	5,209	18,816	13,607
Intermediate Sources	7,226	7,226	20,882	13,656				0
State Sources	1,019,945	1,019,945	1,044,698	24,753	770	17,160	17,160	0
Federal Sources	195,858	492,424	566,627	74,203	152,690	231,049	513,065	282,016
Total Revenues	<u>1,259,500</u>	<u>1,556,066</u>	<u>1,688,335</u>	<u>132,269</u>	<u>158,669</u>	<u>253,418</u>	<u>549,041</u>	<u>295,623</u>
EXPENDITURES :								
Instruction	883,050	1,179,616	1,162,578	17,038	1,633,377	1,633,377	22,874	1,610,503
Support Services	779,666	779,666	774,448	5,218	477,543	549,551	493,341	56,210
Non-Instructional Services	6,455	6,455	6,456	(1)	148,979	171,720	171,540	180
Other Outlays	109	109	109	0				0
Bank Charges				0			1,975	(1,975)
Total Expenditures	<u>1,669,280</u>	<u>1,965,846</u>	<u>1,943,591</u>	<u>22,255</u>	<u>2,259,899</u>	<u>2,354,648</u>	<u>689,730</u>	<u>1,664,918</u>
Revenues Over (Under) Expenditures	<u>(409,780)</u>	<u>(409,780)</u>	<u>(255,256)</u>	<u>154,524</u>	<u>(2,101,230)</u>	<u>(2,101,230)</u>	<u>(140,689)</u>	<u>1,960,541</u>
OTHER FINANCING SOURCES (USES):								
Return of Assets			90	90				0
Estopped Warrants			400	400				0
Total Other Financing Sources (Uses)	<u>0</u>	<u>0</u>	<u>490</u>	<u>490</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Revenue and Other Sources Over (Under) Expenditures and Other Uses	<u>(409,780)</u>	<u>(409,780)</u>	<u>(254,766)</u>	<u>155,014</u>	<u>(2,101,230)</u>	<u>(2,101,230)</u>	<u>(140,689)</u>	<u>1,960,541</u>
Fund Balance, Beginning of Year	<u>409,780</u>	<u>409,780</u>	<u>409,780</u>	<u>0</u>	<u>2,101,230</u>	<u>2,101,230</u>	<u>2,101,230</u>	<u>0</u>
Fund Balance, End of Year	<u>\$0</u>	<u>0</u>	<u>155,014</u>	<u>155,014</u>	<u>0</u>	<u>0</u>	<u>1,960,541</u>	<u>1,960,541</u>

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

NOTES TO FINANCIAL STATEMENTS

**JUSTICE SCHOOL DISTRICT NO. 54
NOTES TO THE FINANCIAL STATEMENTS
FOR THE YEAR ENDED JUNE 30, 2014**

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.

JUSTICE SCHOOL DISTRICT NO. 54
NOTES TO THE FINANCIAL STATEMENTS
FOR THE YEAR ENDED JUNE 30, 2014

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.

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.

**JUSTICE SCHOOL DISTRICT NO. 54
NOTES TO THE FINANCIAL STATEMENTS
FOR THE YEAR ENDED JUNE 30, 2014**

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.

JUSTICE SCHOOL DISTRICT NO. 54
NOTES TO THE FINANCIAL STATEMENTS
FOR THE YEAR ENDED JUNE 30, 2014

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.

JUSTICE SCHOOL DISTRICT NO. 54
NOTES TO THE FINANCIAL STATEMENTS
FOR THE YEAR ENDED JUNE 30, 2014

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

Inventories – The value of consumable inventories at June 30, 2014 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.

**JUSTICE SCHOOL DISTRICT NO. 54
NOTES TO THE FINANCIAL STATEMENTS
FOR THE YEAR ENDED JUNE 30, 2014**

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, 2014, 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.

JUSTICE SCHOOL DISTRICT NO. 54
NOTES TO THE FINANCIAL STATEMENTS
FOR THE YEAR ENDED JUNE 30, 2014

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 its 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, 2014, 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, 2014.

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.

JUSTICE SCHOOL DISTRICT NO. 54
NOTES TO THE FINANCIAL STATEMENTS
FOR THE YEAR ENDED JUNE 30, 2014

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, 2014.

**JUSTICE SCHOOL DISTRICT NO. 54
NOTES TO THE FINANCIAL STATEMENTS
FOR THE YEAR ENDED JUNE 30, 2014**

5. EMPLOYEE RETIREMENT SYSTEM (CONTINUED)

Annual Pension Cost

	<u>Total Payroll</u>	<u>District's Contribution</u>
2013-14	\$ 984,507.	\$ 93,529.
2012-13	\$ 998,260.	\$ 94,834.
2011-12	\$ 1,112,707.	\$ 100,144.

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.

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 February 26, 2015, 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, 2014**

	<u>BUILDING FUND</u>	<u>CO-OP FUND</u>	<u>CHILD NUTRITION FUND</u>	<u>TOTALS (Memorandum Only)</u>
<u>ASSETS</u>				
Cash and Cash Equivalents	<u>\$1,906,030</u>	<u>56,930</u>	<u>11,242</u>	<u>1,974,202</u>
Total Assets	<u>\$1,906,030</u>	<u>56,930</u>	<u>11,242</u>	<u>1,974,202</u>
 <u>LIABILITIES AND FUND EQUITY</u>				
Liabilities:				
Warrants Outstanding	<u>\$1,878</u>	<u>720</u>	<u>11,063</u>	<u>13,661</u>
Total Liabilities	<u>1,878</u>	<u>720</u>	<u>11,063</u>	<u>13,661</u>
Fund Equity:				
Reserved for Encumbrances				0
Fund Balance	<u>1,904,152</u>	<u>56,210</u>	<u>179</u>	<u>1,960,541</u>
Total Fund Equity	<u>1,904,152</u>	<u>56,210</u>	<u>179</u>	<u>1,960,541</u>
Total Liabilities and Fund Equity	<u>\$1,906,030</u>	<u>56,930</u>	<u>11,242</u>	<u>1,974,202</u>

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, 2014**

	<u>BUILDING FUND</u>	<u>CO-OP FUND</u>	<u>CHILD NUTRITION FUND</u>	<u>TOTALS (Memorandum Only)</u>
REVENUES				
District Sources	\$18,816			18,816
State Sources		5,229	11,931	17,160
Federal Sources	<u>282,016</u>	<u>105,167</u>	<u>125,882</u>	<u>513,065</u>
Total Revenues	<u>300,832</u>	<u>110,396</u>	<u>137,813</u>	<u>549,041</u>
EXPENDITURES				
Instruction	22,874			22,874
Support Services	419,402	73,939		493,341
Operation of Non-Instruction Services	13,397		158,143	171,540
Bank Charges	<u>1,975</u>			<u>1,975</u>
Total Expenditures	<u>457,648</u>	<u>73,939</u>	<u>158,143</u>	<u>689,730</u>
Revenues Over (Under) Expenditures	<u>(156,816)</u>	<u>36,457</u>	<u>(20,330)</u>	<u>(140,689)</u>
OTHER FINANCING SOURCES (USES):				
Estopped Warrants				0
Total Other Financing Sources (Uses):	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Revenue and Other Sources Over (Under) Expenditures and Other Uses	(156,816)	36,457	(20,330)	(140,689)
Fund Balance, Beginning of Year	<u>2,060,968</u>	<u>19,753</u>	<u>20,509</u>	<u>2,101,230</u>
Fund Balance, End of Year	<u>\$1,904,152</u>	<u>56,210</u>	<u>179</u>	<u>1,960,541</u>

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, 2014

	Building Fund			Coop Fund				Child Nutrition Fund			
	Original/ Final Budget	Actual	Variance Favorable (Unfavorable)	Original Budget	Final Budget	Actual	Variance Favorable (Unfavorable)	Original Budget	Final Budget	Actual	Variance Favorable (Unfavorable)
REVENUES:											
Local Sources	\$5,209	18,816	13,607				0				0
State Sources			0		5,229	5,229	0	770	11,931	11,931	0
Federal Sources		282,016	282,016	38,388	105,167	105,167	0	114,302	125,882	125,882	0
Total Revenues	5,209	300,832	295,623	38,388	110,396	110,396	0	115,072	137,813	137,813	0
EXPENDITURES :											
Instruction	1,633,377	22,874	1,610,503				0				0
Support Services	419,402	419,403	(1)	58,141	130,149	73,939	56,210				0
Operation of Non-Instructional Services	13,398	13,397	1				0	135,581	158,322	158,143	179
Bank Charges		1,974	(1,974)				0				0
Total Expenditures	2,066,177	457,648	1,608,529	58,141	130,149	73,939	56,210	135,581	158,322	158,143	179
Revenues Over (Under) Expenditures	(2,060,968)	(156,816)	1,904,152	(19,753)	(19,753)	36,457	56,210	(20,509)	(20,509)	(20,330)	179
OTHER FINANCING SOURCES (USES):											
Estopped Warrant			0				0				0
Total Other Financing Sources (Uses)	0	0	0	0	0	0	0	0	0	0	0
Revenue and Other Sources Over (Under) Expenditures and Other Uses	(2,060,968)	(156,816)	1,904,152	(19,753)	(19,753)	36,457	56,210	(20,509)	(20,509)	(20,330)	179
Fund Balance, Beginning of Year	2,060,968	2,060,968	0	19,753	19,753	19,753	0	20,509	20,509	20,509	0
Fund Balance, End of Year	\$0	1,904,152	1,904,152	0	0	56,210	56,210	0	0	179	179

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, 2014**

	<u>ACTIVITY FUND</u>	<u>INSURANCE FUND</u>	<u>TOTALS (Memorandum Only)</u>
<u>ASSETS</u>			
Cash and Cash Equivalents	<u>\$35,531</u>	<u>74,756</u>	<u>110,287</u>
Total Assets	<u><u>\$35,531</u></u>	<u><u>74,756</u></u>	<u><u>110,287</u></u>
<u>LIABILITIES AND FUND EQUITY</u>			
Liabilities:			
Warrants Outstanding	<u>1,545</u>	<u> </u>	<u>1,545</u>
Total Liabilities	<u>1,545</u>	<u>0</u>	<u>1,545</u>
Fund Equity:			
Fund Balance	<u>33,986</u>	<u>74,756</u>	<u>108,742</u>
Total Fund Equity	<u>33,986</u>	<u>74,756</u>	<u>108,742</u>
Total Liabilities and Fund Equity	<u><u>\$35,531</u></u>	<u><u>74,756</u></u>	<u><u>110,287</u></u>

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 BALANCES
TRUST AND AGENCY FUNDS - REGULATORY BASIS
FOR THE YEAR ENDED JUNE 30, 2014**

	<u>ACTIVITY FUND</u>	<u>INSURANCE FUND</u>	<u>TOTALS (Memorandum Only)</u>
Revenues:			
District Sources	<u>\$25,283</u>	<u> </u>	<u>25,283</u>
 Total Revenues	 <u>25,283</u>	 <u>0</u>	 <u>25,283</u>
 Expenditures:			
Support Services	<u>0</u>	<u> </u>	<u>0</u>
Operation of Non-Instruction Services	<u>40,260</u>	<u> </u>	<u>40,260</u>
 Total Expenditures	 <u>40,260</u>	 <u>0</u>	 <u>40,260</u>
 Excess of Revenues and Other Sources Over (Under) Expenditures and Other Uses	 <u>(14,977)</u>	 <u>0</u>	 <u>(14,977)</u>
 Fund Balance, Beginning of Year	 <u>48,963</u>	 <u>74,756</u>	 <u>123,719</u>
 Fund Balance, End of Year	 <u><u>\$33,986</u></u>	 <u><u>74,756</u></u>	 <u><u>108,742</u></u>

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, 2013 TO JUNE 30, 2014**

	<u>Balance 07/01/13</u>	<u>Deposited</u>	<u>Transfers</u>	<u>Disbursed</u>	<u>Balance 06/30/14</u>
Concession	\$30,154.00	17,306.03		20,999.37	26,460.66
Pre-K	0.00	0.00		0.00	0.00
Athletics	15,130.74	0.00		10,751.13	4,379.61
Staff Account	1,123.79	0.00		115.00	1,008.79
Library	1,270.58	895.95		2,149.47	17.06
Petty Cash	0.00	0.00		0.00	0.00
JOM Parent Committee	48.82	5,341.85		5,135.39	255.28
Student Cou ncil	<u>1,235.50</u>	<u>1,739.00</u>		<u>1,110.00</u>	<u>1,864.50</u>
TOTALS	<u>\$48,963.43</u>	<u>25,282.83</u>	<u>0.00</u>	<u>40,260.36</u>	<u>33,985.90</u>

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, 2014**

	Project Code	Federal CFDA Number	Program or Award Amount	Cash/ Beginning Balance at July 1, 2013	Federal Receipts	Federal Expenditures Direct Costs	Indirect Costs	Cash/ Ending Balance at June 30, 2014
<u>Direct Funding</u>								
Title IX Indian Education	561	84.060	\$34,277.00		34,277.00	29,963.00		4,314.00
Sub-total			34,277.00	0.00	34,277.00	29,963.00	0.00	4,314.00
Impact Aid	591	84.041	417,696.24	454,147.17	382,016.33	417,696.24		418,467.26
Sub-total			417,696.24	454,147.17	382,016.33	417,696.24	0.00	418,467.26
REAP	588	84.358B	24,982.00		20,668.00	24,982.00		(4,314.00)
Sub-total			24,982.00	0.00	20,668.00	24,982.00	0.00	(4,314.00)
<u>U.S. Department of Education</u>								
Passed through the Department of Education:								
Title I	511	84.010	64,746.29		61,586.05	58,183.94	3,793.57	(391.46)
Title I - Prior Year	799	84.010		(18,748.02)	18,748.02			0.00
Title I - School Improvement	515	84.010	10,789.70		0.00	10,308.75		(10,308.75)
Title I Cluster			75,535.99	(18,748.02)	80,334.07	68,492.69	3,793.57	(10,700.21)
Title II, Part A - REAP	541	84.367	6,722.00		6,722.00	6,310.56	411.44	0.00
Title II, Part A - REAP - Prior Year	799	84.367		(2,367.27)	2,367.27			0.00
Title II Cluster			6,722.00	(2,367.27)	9,089.27	6,310.56	411.44	0.00
21st Century	553	84.287	197,757.08		141,621.50	197,757.08		(56,135.58)
21st Century - Prior Year	799	84.287		(174,742.85)	174,742.85			0.00
21st Century Cluster			197,757.08	(174,742.85)	316,364.35	197,757.08	0.00	(56,135.58)
IDEA-B Flow Through	621	84.027	66,779.50		66,779.50	66,779.50		0.00
IDEA-B Flow Through - Prior Year	799	84.027		(38,387.94)	38,387.94			0.00
IDEA-B Pre-School	641	84.173	400.42					0.00
Special Education Cluster			67,179.92	(38,387.94)	105,167.44	66,779.50	0.00	0.00
Other Federal Assistance								
Johnson O'Malley	563	15.130	4,420.50		4,420.50	4,420.50		0.00
Johnson O'Malley - Prior Year	799	15.130		(1,473.50)	1,473.50			0.00
Sub-total			4,420.50	(1,473.50)	5,894.00	4,420.50	0.00	0.00
<u>U.S. Department of Agriculture</u>								
Passed Through the State Department of Education								
Food Service Programs - Lunches	763	10.555	77,549.48		77,549.48	77,549.48		0.00
Food Service Programs - Breakfasts	764	10.553	43,279.69		43,279.69	43,279.69		0.00
Summer Food	766	10.559	6,835.09		0.00	6,835.09		(6,835.09)
Summer Food - Prior Year	799	10.559		(5,053.33)	5,053.33			0.00
USDA Donated Food	385	10.550	7,438.94		7,438.94	7,438.94		0.00
Child Nutrition Cluster			135,103.20	(5,053.33)	133,321.44	135,103.20	0.00	(6,835.09)
Total Federal Assistance			\$963,673.93	213,374.26	1,087,131.90	951,504.77	4,205.01	344,796.38

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, 2014**

Keith Claybrook – Treasurer
Employee Dishonesty Bond
Western Surety Bond – Bond No. 70767216
\$100,000 Limit
Effective July 1, 2013 to June 30, 2014

Encumbrance, Minutes Clerk, & Deputy Minutes Clerk
Employee Dishonesty Bond
Western Surety Bond – Bond No. 70767216
\$100,000 Limit
Effective July 1, 2013 to June 30, 2014

Chris Bryan - Superintendent
Employee Dishonesty Bond
Western Surety Bond – Bond No. 70767216
\$100,000 Limit
Effective July 1, 2013 to June 30, 2014

Activity Fund Custodian
Employee Dishonesty Bond
Western Surety Bond – Bond No. 70767216
\$100,000 Limit
Effective July 1, 2013 to June 30, 2014

Principial
Employee Dishonesty Bond
Western Surety Bond – Bond No. 70767216
\$100,000 Limit
Effective July 1, 2013 to June 30, 2014

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*

February 26, 2015

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, 2014, and the related notes to the financial statements, which collectively comprise the District's financial statements, and have issued our report thereon dated February 26, 2015, 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
EDMOND, OKLAHOMA 73013
(405) 348-3800
Fax (405) 348-3846

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

February 26, 2015

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, 2014. 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, 2014.

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, 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, 2014**

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 No
- * Significant Deficiency(ies) identified not considered to be material weakness(es)? Yes None Reported

Noncompliance material to financial statement noted? Yes No

Federal Awards

Internal control over major programs:

- * Material weakness(es) identified? Yes No
- * Significant Deficiency(ies) identified not considered to be material weakness(es)? Yes 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 No

Identification of major programs:

<u>CFDA Number</u>	<u>Name of Federal Program</u>
84.041	Impact Aid
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 No

**JUSTICE SCHOOL DISTRICT NO. 54
SEMINOLE COUNTY, OKLAHOMA
SCHEDULE OF FINDINGS AND QUESTIONED COSTS
FOR THE YEAR ENDED JUNE 30, 2014**

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

MANAGEMENT LETTER AND COMMENTS

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

February 26, 2015

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

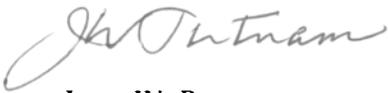
We have audited financial statements of Justice School District No. 54, Seminole County, Oklahoma, as of and for the year ended June 30, 2014, as listed in the table of contents, and have issued our report thereon dated February 26, 2015. As a part of our audit, we made a study and evaluation of the 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 February 26, 2015 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, 2014**

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:

<u>Findings</u>	<u>No. of Instances</u>
Did Not Sign for Goods/Services	13
Paid From a Copy of the Original Invoice	2
Inaccurate Math	4
Incomplete Documentation	2
Paid From a Vendor's Statement	3
Paid Sales Tax	3

REVIEW OF ACTIVITY FUND TRANSACTIONS

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

<u>Findings</u>	<u>No. of Instances</u>
Did Not Sign for Goods/Services	7
Incomplete Documentation	1
Invoice Date Before P.O. Date	1

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.