AGENDA ITEM: New Charter Application – American Indian Model Schools

American Indian Model Schools submitted a complete charter application package for the Board's consideration. The revised application package meets the requirements set by the Board for the 2012-2013 application cycle. This report contains:

1. A staff overview of the application package, including a description of the proposed education plan, a description of the applicant's organization with a summary of information submitted regarding applicant education and experience, and a description of the applicant's business plan,
2. Additional background information regarding the qualifications of the applicant, based on affiliations with current or prior charter operations, and
3. Staff's recommendation regarding this application package.

Additional items in the portfolio include:

- A copy of the final scoring rubric which confirms the application package does meet the requirements as demonstrated through the review of the preliminary application package submitted on July 1, including the technical assistance provided to the applicant and review of the revised application package submitted on December 20, and
- Each section of the revised application, and
- Additional background information regarding the qualifications of the applicant.

SUMMARY OF THE TITLE PAGE

American Indian Model Schools is an Arizona nonprofit corporation. The authorized representative for the corporation is Lawrence Martinez. The proposed school, Tucson AIM Middle School, will serve grades 6-8 in Tucson.

Mission Statement

The stated mission of Tucson AIM Middle School is as follows: Tucson AIM will serve 235 inner-city students in sixth through eighth grade. The focus of Tucson AIM is excellent student attendance (99%) that helps to ensure the students' academic needs are met. The school will provide students with an education to enhance their academic skills in reading, writing, spelling, mathematics, science, social science, business and humanities, so they may compete in and be productive members of a free market capitalistic society. This will be a collaborative effort between school, family and community.

A. EDUCATION PLAN – The following summary was created by pulling key phrases from the narrative of the applicant's Education Plan.

Educational Philosophy	**Philosophical approach** AIM's self-contained classrooms, a focus on English-language arts, math, science and social studies, expectations for hard work in and out of the classroom, an extended-year calendar (of 196 instructional days including mandatory summer school for all students), family culture, and other components provide the structure, rigor, and targeted intervention necessary for ensuring that all students have the opportunity to thrive academically and behaviorally. The framework for the AIM of Education are composed of family culture, accountability/structure, high expectations, and free market capitalism, as referenced on pages 7-11 of section A.1 of the revised application. **Rationale**

	The American Indian Model (AIM) has been used with the applicant's target population of inner-city minority and socio-economically disadvantaged students to great academic success at their three schools in Oakland, CA. According to Andrew Coulson of the Cato Institute, "Overall, the American Indian charter schools network has more than four times as many passing AP scores per black and Hispanic student as its closest charter network competitor (KIPP)."
Target Population	Tucson AIM Middle School will serve approximately 235 students in sixth through eighth grade. Tucson AIM's goal is to provide minority and socio-economically disadvantaged students with strong academic skills. The school will serve a diverse student population that reflects the Tucson student population. The American Indian Model benefits inner-city minority youth with its structure and high expectations. The self-contained classrooms provide stability.

Program of Instruction – the applicant was required to describe a program of instruction that supports the educational philosophy and target population.	**Framework:** The narrative states that Tucson AIM Middle School will use State-approved textbooks aligned with the standards to provide the content basis for courses of study. These subjects include the four core content areas of English-language arts, mathematics, science and social studies, as well as PE and the arts. Students will be provided a structured learning environment and those with special learning needs will be mainstreamed into the classroom, while also receiving individual support to ensure their success. In addition, all eighth graders will be required to take Algebra 1 to prepare them for the advanced math courses in high school, to eventually get them ready to take calculus in college.
	
	Methods of Instruction: The narrative lists the following to be used as methods of instruction:
	• Direct Instruction
	• Differentiated Instruction
	• Student Research Projects and Scientific Inquiry/Experimentation
	• Pre-AP vertical teaming
	
	Methods of Assessment: The narrative lists the following to be used as their methods of assessment:
	• Formative:
	  ○ Teacher observation and student feedback
	  ○ Questioning strategies
	  ○ Self and peer assessments
	  ○ Holding up answers on mini white boards
	  ○ Exit tickets
	  ○ Doing board work in front of the teacher
	  ○ Brainstorming ideas
	  ○ Student read-alouds
	  ○ Descriptive feedback
	• Summative
	  ○ Arizona's Instrument to Measure Standards (AIMS) Exams
	  ○ Arizona English Language Learner Assessments (AZELLA)
	  ○ Cumulative Final or Diagnostic Exams
	  ○ End-of-unit exams, projects, and essays

- Diagnostic or benchmark exams that assess how well the student is mastering the standards
- Individual Education Plan (IEP) reviews
- Quizzes and tests
- Daily homework
- Graded class work
- Essays
- Group and individual projects/presentations
- Lab reports

School Calendar

Extended School Year, 196 Days

Student Count

Year	Grades Served	# of Students	# of Sites
1	6-7	120	1
2	6-8	210	1
3	6-8	235	1

Curriculum Samples

Curriculum samples for Tucson AIM Middle School were provided for grades 6-8. The table below indicates which curriculum samples in the revised application package met all Board requirements (+), and which had deficiencies (-). Details can be found in the attached Scoring Rubric.

Grade	Math	Reading	Writing	Science
6	+	+	+	
7	+	+	+	
8	+	+	+	+

PMP

The Performance Management Plan (PMP) for new applicants is for the purpose of ensuring the school's curriculum, instruction, monitoring of student achievement, and professional development are in place and appropriate for providing a quality education for each student it serves. It is also intended to focus the school on meeting the Board's level of adequate academic performance.

The table below indicates the criteria in the revised PMP that met Board requirements (+), or had deficiencies (-). Details can be found in the attached Scoring Rubric.

Evaluation Criteria	Math	Reading
Predicted Baseline for percent passing in AIMS	35%	55%
Aligns with the applicant's Education Plan.	+	+
Presents a viable plan for managing student academic performance that includes a predicted baseline and annual benchmark targets for the first two years of operation which reflect incremental progress toward the end target.	+	+
Identifies action steps, timeline, responsible party, evidence of meeting action steps, and budget for accomplishing all four prescribed strategies.	+	+
Reveals a progression of actions from start to finish for each strategy that are sequential, timely, and contribute to the school's ability to meet the identified end target.	+	+

	Creates action steps that complement and support the other strategies to the extent appropriate.	+	+
	Includes artifacts that provide evidence of the implementation of each action step.	+	+
	Provides adequate resources, i.e. time, money personnel, etc. to implement the action steps that support the strategies.	+	+
	Reflects costs from the Performance Management Plan in the Start-Up and Three-Year Operational Budget.	+	+
	For reference, FY 2011 AIMS State Average Passing Percentage is provided below. Parentheses indicate change from FY2010 State Average Passing Percentage. K-8 Math: 61% (+2%) K-8 Reading: 75% (+2%)		

Education Plan Findings

Preliminary application package: 5/40 scoring areas did not meet the criteria. The revised application, for which consideration is being given, met Board requirements in all scoring areas in the Education Plan section. Details can be found in the attached Scoring Rubric.

B. ORGANIZATION DESCRIPTION

American Indian Model Schools (AIMS) is a nonprofit corporation, located in Oakland, CA, that was created on May 10, 1996, under the name American Indian Public Charter School, Inc. (AIPCS), for the purpose of meeting the academic, social, cultural, and developmental needs of American Indian students, and all students, with five Directors (Ramona Wilson, Duane BigEagle, Bridget Wilson, Millie Katecheshawno, and Richard Osborne), none of whom is currently on the corporate board. According to a document submitted by the applicant, AIPCS filed an amendment changing the name of the applicant to American Indian Model Schools with the California Secretary of State on January 11, 2011. AIMS was granted Authority to Conduct Affairs in Arizona by the Arizona Corporation Commission (ACC) on July 12, 2011, listing three Directors, Michael Stember, Jordan Locklear, and Nate Robles, and stating that the corporation does have members. On December 22, AIMS notified the ACC that the three Directors previously listed had been replaced by Albert Sye, Lawrence Martinez, and Dr. Barbara Benton of the Tucson AIM Founding Committee (all took office on 12/22/11). The corporation as it is being considered today includes 3 Directors. The applicant references Tucson AIM as an entity operating under the AIMS nonprofit corporation and appears to indicate that the charter holder status will change once operation begins.

Roles and Responsibilities

Corporate Board	Governing Body
The In the beginning, Tucson AIM will fall under AIMS's 501(c)(3) status but will create its own legal entity by the second year of operation. Tucson AIM Middle School shall be governed by a Board of Directors (the "Board" or "Governing Board"). The Board shall be ultimately responsible for the operation and activities of the school. Tucson AIM shall be governed pursuant to the corporate bylaws.	The Tucson AIM Governing Board will be comprised of at least five and no more than fifteen diverse community members. Currently The Tucson AIM board consists of 3 members described in this section. A minimum of one family member, one educator and one businessperson will serve on the Board. These Governing Board members will reflect the student population and be of diverse professional backgrounds. The Board will meet on a regular basis. The

Tucson AIM and/or its nonprofit corporation will be solely responsible for the debts and obligations of the charter school. Tucson AIM shall promptly respond to all reasonable inquiries from the Arizona State Board for Charter Schools and/or other reporting bodies, as applicable. Recognizing the importance of local autonomy and accountability, Tucson AIM's governing board will have "supreme" authority over the day-to-day operations of Tucson AIM, including but not limited to curriculum design, assessment methods and tools, hiring and training of staff, student recruitment, operation of business affairs, upkeep of facility, and financial operations. As the sponsoring board, AIMS would only intervene in matters that put at risk the name of the organization, its status, and/or its nonprofit eligibility. Especially during its start-up phase (beginning in January 2012), the Tucson AIM Board will confer with the American Indian Model Schools (AIMS) Governing Board as an advisory body. The relationship between the Board of AIMS and the Board of Tucson AIM will be one of support, sponsorship, sharing of best practices, alignment with and implementation of the American Indian Model, and any other start-up assistance as needed. Pending charter approval, the liaison, Dr. Barbara Benton will act as a go-between of AIMS's Governing Board and Tucson AIM's Governing Board. As discussed in B.1, the liaison will coordinate communication and start-up activities for Tucson AIM. During the first year of Tucson AIM's operations, Dr. Benton will report directly to AIMS every month regarding Tucson AIM's progress, in order to ensure smooth operations for the new school. These meetings will focus on areas such as budgeting, curriculum, hiring/training, adopting a school calendar and master class schedule, implementing the American Indian Model of education, compliance with Arizona State Board of Education requirements, and other general and specific oversight as needed. The liaison is a member of the advisory Founding Committee, as discussed in B.1. The Founding Committee will help in the	responsibilities of the Board include, but are not limited to: • Upholding the mission of the School • Overseeing the implementation of the charter • Approving and monitoring the school budget, fiscal reports, and the School's fiscal practices • Approving all contracts and expenses • Receiving and reviewing the yearly independent financial audit • Approving and monitoring the school's facility arrangements and plans • Overseeing and evaluating the Director/Principal • Hiring the Director/Principal • Monitoring the Director/Principal's implementation of the school's personnel policy • Providing for the safety of all students and staff • Approving Board Policies Members of Tucson AIM's governing board, any administrators, managers or employees, and any other committees of the School shall at all times comply with federal and state laws, nonprofit integrity standards and Arizona charter school policies and regulations.

establishment of Tucson AIM. The liaison, Dr. Barbara Benton, is the Tucson AIM Governing Board Secretary.	

Establishment of Governing Body

Individuals interested in filling a vacancy on the Tucson AIM Middle School Board shall submit a letter of interest and resume. The existing Tucson AIM Board members vote on the new Board members. Vacancies on the Board may be filled by board approval, or, if the number of directors then in office is less than a quorum, by the unanimous written consent of the directors then in office, or by the affirmative vote of a majority of the directors then in office at a meeting held pursuant to proper legal notice.

Existing Tucson AIM Board members (with the potential help of AIMS) will seek to recruit additional members of the governing board, including family members of students, educators, and business people or other community members. The Board may try to approach local reputable businesses to inquire if their leaders might be interested, attend community forums and meetings to identify individuals whose actions and experiences represent alignment with Tucson AIM's mission and goals, and send correspondence home to students announcing that parents and/or other family members are encouraged to apply for a seat on the Board.

School Governing Body

Member Type	Number	Name
Organization Principal(s)	2	Albert Sye, Dr. Barbara Benton
Educator	1	G. Kevin Locklear
Family Member	1 (min)	To be determined
Other-Business Community	1 (min)	To be determined

Charter Principal Background Information

Principal Name	Confirmed Education History	Confirmed Employment History	FCC	Notes
Lawrence Martinez	Ed. S. Educational Administration, 1991 University of Arizona	2010-2011: Middle School Administrator, Pima Partnership Academy Middle School 2008-2010: Assistant Principal/Interim Principal, Palo Verde High School 2002-2008: Assistant Principal/Co-Principal, Rincon High School	Valid	There were no concerns identified with the background and internet checks.
Albert Sye	M. Ed. Secondary Education, 1985 University of Arizona	2009-2011: Retired 2008-2009: Principal, Oakland Unified School District. 2006-2008: Principal, St. Michaels Indian School.	Valid	There were no concerns identified with the background and internet checks.
Barbara Benton	Ed. D. Educational Leadership, 1999	1999-present: Adjunct Professor of Education, Northern Arizona	Valid	There were no concerns

	Northern Arizona University	University. 1966-2008: Magnet Grant Director, Tucson Unified School District		identified with the background and internet checks.

Organization Description Findings

Preliminary application package: 19/23 scoring areas did not meet the criteria. The revised application met Board requirements in all scoring areas in the Organization Description section of the application. Details can be found in the attached Scoring Rubric.

C. BUSINESS PLAN

Site Information

Proposed School Name	Tucson AIM Middle School
Proposed Location	Confirmed location: 200 E. Yavapai Road, Tucson
Proposed/Secured Facility	The facility will consist of 14,105 square feet, with 8 classrooms, an auditorium, a kitchen and cafeteria, a computer lab, a resource room, administration offices, a large playground, basketball court and parking lot, on three acres of land. Lumbee Holdings, LLC, a real-estate company that owns some of American Indian Model Schools' charter school buildings in Oakland, California, has a written contract to purchase the 200 E. Yavapai building. There is an opt-out clause on the sale only if this charter is not approved. After the purchase, Lumbee Holdings, LLC, will then lease the building to Tucson AIM Middle School starting in July 1, 2012. All of the costs incurred for securing the facility (via the purchase) and ensuring compliance with laws regarding educational occupancy will be paid for by Lumbee Holdings, LLC. Lumbee Holdings, LLC, will purchase the building pending charter approval. Tucson AIM will then lease the building from them. The lease will for be $14,105 per month with a $14,105 refundable security deposit. Pending charter approval, the middle school would begin its lease on July 1, 2012. However, the first month's payment and deposit would not be due until August 1.

Budget

Secured Funds	The applicant has secured a loan from the parent organization (AIMS) for start-up purposes. The secured funds, in the amount of $100,000 as stated by the applicant, are confirmed by Community Bank of the Bay. The applicant has secured in kind donations of office space for use from March to June 2012, including utilities and communications from an unlisted building owner for start-up purposes. The secured donation, as stated by the applicant, is not confirmed by any documentation or communication. The applicant has secured in kind donations of office and classroom furniture, to meet the enrollment and staffing needs, from the parent organization (AIMS) for start-up purposes. The secured donation, as stated by the applicant, is confirmed by the applicant.
Start-up Budget	The start-up budget, in the amount of $73,300, includes: salaries, employee benefits, office supplies, curriculum/resource material, Craigslist employment announcement, office technology equipment, copier, and student recruitment. At the end of the start-up period, revenue exceeds expenditures. The applicant lists a small amount of $500 for student recruitment (advertising and promotion) as they describe in the narrative, that marketing videos and television specials highlighting AIM have already been created.
Annual Operating Budgets	Year one operating budget is based on 98% of anticipated student enrollment of 120 students, with a projected per-student equalization funding of $5,946. Projected annual budget balances are: Year One – $35,703, Year Two – $108,788, and Year Three – $199,590. At the end of each year revenue exceeds expenditures.

Business Plan Findings

Preliminary application package: 10/22 scoring areas did not meet the criteria. The revised application met Board requirements in all scoring areas in the Business Plan section of the application. Details can be found in the attached Scoring Rubric.

Scoring Rubric Summary

The application overall meets the Board's scoring criteria. The preliminary application package did not meet 40% of the scoring areas.

ADDITIONAL BACKGROUND INFORMATION

Additional data is included below to provide information related to the applicant's principals' experience, qualifications, and current and prior charter compliance as an indicator of the applicant's ability to implement a charter or operate a charter school.

Charter Principal Affiliations

Principal Name	Current Affiliation(s)	Past Affiliation(s) of Note	Comments
Lawrence Martinez, Albert Sye, Dr.	American Indian Model Schools operates three charter schools in Oakland, CA: • American Indian Public Charter School		

Barbara Benton	• American Indian Public High School • American Indian Public Charter School II		

Current and Prior Charter Compliance

Corporate Principal	Compliance Information
American Indian Model Schools	After completion of the Administrative Completeness check, Board staff determined that the sole principal listed on the application, Lawrence Martinez, was not consistent with the three officers listed on Application for Authority to Conduct Affairs, files by American Indian Model Schools (AIMS) with the Arizona Corporation Commission (ACC) on July 23, 2011. It lists, as Directors and Officers of the foreign corporation, Michael Stember, Jordan Locklear, and Nate Robles. A request for background information on these Directors was sent to Mr. Martinez on December 20, with a reply due by December 27. Between December 20 and 27, Mr. Martinez submitted copies of background information for Albert Sye and Dr. Barbara Benton. On December 28, Mr. Martinez submitted a copy of a letter filed with the ACC on December 22 changing the officers of AIMS from Michael Stember, Nate Robles, and Jordan Locklear, to Albert Sye, Lawrence Martinez, and Dr. Barbara Benton. That change has been reflected on the ACC website. In the process of performing due diligence, Board staff contacted the authorizer of the charter schools currently operated by AIMS. Staff conducted a teleconference with Ms. Gail Greely, the Coordinator of the Office of Charter Schools for the Oakland Unified School District (OUSD) in Oakland, California. In addition to the discussion of academic performance of the charter schools currently operated by AIMS, shown in the graphs on page 13, Ms. Greely discussed the following issues with staff: 1. **Membership**: Staff found that the three principals listed by AIMS in the revised application did not match the list of Directors of AIMS submitted to the OUSD office. The most recent list, submitted by AIMS to OUSD on December 17, 2011, included five members of the AIMS board: Jordan Locklear, Michael Stember, Judy Marquardt, Chris Rodriguez, and Ben Chavis. The roster on file with OUSD at the time of initial submission of the Arizona AIMS application in June, 2011 listed Jordan Locklear, Michael Stember, Judy Marquardt-Norris, Nathan Robles, and Janet Roberts. There appear to be inconsistencies between the membership of the corporate board of AIMS as reported by the applicant to ASBCS and the ACC, and to the California authorizer of the charter schools currently operated by AIMS. 2. **Renewal Site Visit**: Ms. Greely shared that one of the AIMS schools, American Indian Charter Public School II (AIPCS II), is currently going through its renewal process. Site visits conducted as part of the renewal resulted in a list of follow-up items (see Appendix 1 on page 15 of this report).

Notice of Concern: OUSD also provided Board staff with a copy of a Notice of Concern which had been issued to AIMS as a result of the sudden opening of a new 5th grade and admission of numerous 6th and 7th grade students to AIPCS II on October 31. The Notice (see Appendix 2 on page 17) included the following issues:

1. **Building Occupancy**: The Notice of Concern identifies concerns with a building occupied by AIPCS II. It states that the school shares space with an independent school in a building owned by Dr. Ben Chavis, who has been identified as an AIMS board member and Chief Executive. According to the Notice, OUSD has made multiple requests for an Educational Occupancy Permit and also requested evidence of compliance with safety code provisions. The Notice lists a due date for the response of December 12. According to Ms. Greely, as of January 5, no response has been submitted.

   There appear to be concerns regarding non-compliance involving the applicant and the applicant's current authorizer that include the landlord's role in demonstrating compliance. Additional relevance to the Arizona application: Dr. Chavis is identified as landlord for the proposed AIM school in Tucson. Section C.1 of the revised application submitted by AIMS states, "Tucson AIM Middle School will be located at 200 E. Yavapai Road in Tucson. Lumbee Holdings, LLC, a real-estate company that owns some of American Indian Model Schools' charter school buildings in Oakland, California, has a written contract to purchase the 200 E. Yavapai building." According to the website of the Nevada Secretary of State, Lumbee Holdings LLC is a Nevada domestic limited liability corporation with the following managing members: Ben Chavis, Henry Bell, and Lela Chavis.

2. **Relationship with Authorizer**: The Notice of Concern also addresses the sudden increase in enrollment at AIPCS II beyond the capacity specified in its charter (the charter specifies 200, enrollment in November reached 282). In addition to the occupancy compliance documents described above, the Notice requests documentation regarding the addition of the 5th grade, such as board meeting minutes and a rationale, evidence of board discussion of increasing enrollment beyond the level specified in the charter, and plans for meeting the instructional minute requirement for students newly enrolled in late October. AIMS has not met the December 12 deadline for this response. According to Ms. Greely, as of January 5, no response has been submitted.

   There appears to be a lack of responsiveness on the part of the applicant to oversight requests made by its authorizer.

Request for Extraordinary Audit: According to documents provided by Ms. Greely, in August 2011, OUSD was approached by an employee of AIMS alleging conflict of interest and misappropriation of state and federal funds. In a letter dated November 23 (see Appendix 3 on page 22), OUSD Superintendent Tony Smith requested an extraordinary audit of AIMS be conducted by the Alameda County Office of Education (ACOE). In a letter dated December 5 (see Appendix 4 on page 26), ACOE Superintendent Sheila Jordan

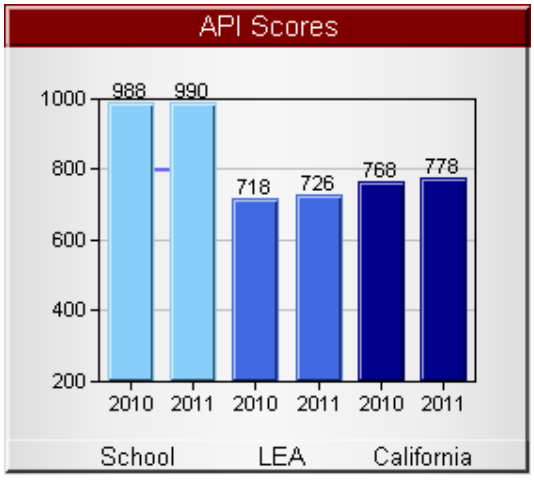
	authorizes the audit which, according to Ms. Greely, is proceeding. The letter of November 5 describes the following allegations (all wording taken directly from the letter except as marked by brackets): 1. Funds from an after-school program (ASES) were re-directed to a company owned by Dr. Ben Chavis (ADS or American Delivery Systems) to fund an expansion of AIMS programs into Arizona… [OUSD] has confirmed the amount of the grant allocation, the underpayments to [two other schools included in the grant], and that some portion of the balance was paid out to Dr. Chavis' company, ADS… The former employee says that Dr. Chavis asked that the diversion of funds be covered up by providing the leaders of [the two other schools] with a falsified report claiming that the funds were shared out among four schools instead of three. Another AIMS school, AIPCS, receives ASES funds as part of another group led by Oakland Unity High School. The former employee alleges that AIPCS claimed and received funds for a substantial period when no program was in operation… The former employee alleges that falsified reports were filed regarding the program at the direction of Dr. Chavis. [OUSD] has been able to confirm that grants were awarded for the program and that Oakland Unity passes through the funds to the AIMS schools, but does itself not operate the ASES program at other sites. 2. The former employee alleges that the three AIMS charter schools all occupy properties owned or leased by Dr. Chavis or by companies owned by him, his wife [Marsha Amador, noted elsewhere in this document as the accountant for AIMS] or close associates, and that rent being collected by Dr. Chavis from the schools are in excess of reasonable market rates… [OUSD] has been able to confirm the connections between Dr. Chavis's companies and the properties leased by AIPCS and AIPHS (including a lease with Dr. Chavis's company, ADS). [OUSD] has also looked at the assessed valuation of the properties and gathered data on market rates for similar properties. This data suggests that the lease rates may be excessive. 3. The former employee has alleged that AIMS schools make payments to Dr. Chavis's company, ADS, for a summer enrichment program known as SAIL (Stanford Academic Institute of Learning – the District has confirmed that there is no official affiliation with Stanford University). The individual listed on correspondence as the director of the program, Larry Martinez, is a former AIMS board member. Documentation related to these transactions has been provided by the former employee. 4. Dr. Chavis has variously described himself as "chief", "founder", "director", or "just the landlord" for the schools. Dr. Chavis may therefore be a "disqualified person" within the context of the IRS regulations on "excess benefit transactions" because he "was in a position to exercise substantial influence over the affairs" of the school. The most recent publicly-posted form 990 does not disclose any

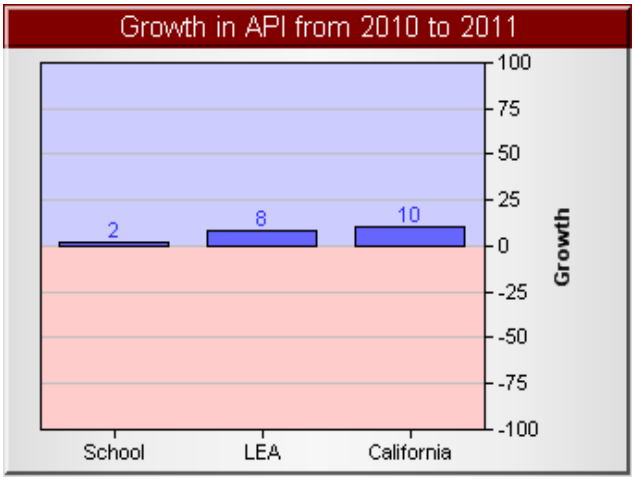
	financial dealings with possible "disqualified persons" including Dr. Chavis, Ms. Amador, or Mr. Martinez. OUSD acknowledges that the allegations and the preliminary investigation do not prove that any illegal or unethical activities have taken place, but states that the evidence collected does constitute reason to believe that such activities may have occurred, and merit further investigation by the auditors.

Academic Performance of Associated Schools (California Academic Performance Index (API))

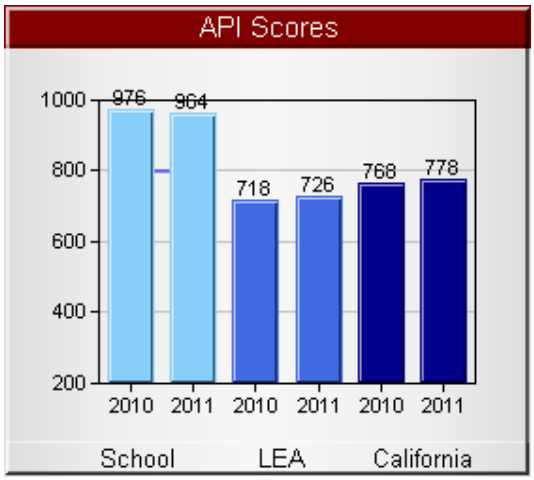
The API is a single number, ranging from a low of 200 to a high of 1000, which reflects a school's, an LEA's, or a subgroup's performance level, based on the results of statewide testing. Its purpose is to measure the academic performance and growth of schools. The API was established by the PSAA, a state law passed in 1999 that created a new academic accountability system for K-12 public education in California. The API is calculated by converting a student's performance on statewide assessments across multiple content areas into points on the API scale. These points are then averaged across all students and all tests. The result is the API. An API is calculated for schools, LEAs, and for each numerically significant subgroup of students at a school or an LEA. The information that forms the basis for calculating the API comes from the results of the Standardized Testing and Reporting (STAR) Program and the California High School Exit Examination (CAHSEE).

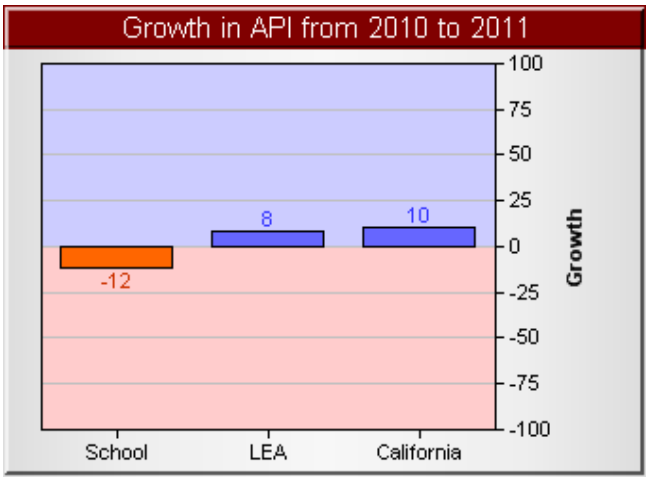
American Indian Public Charter School (grades 6-8)



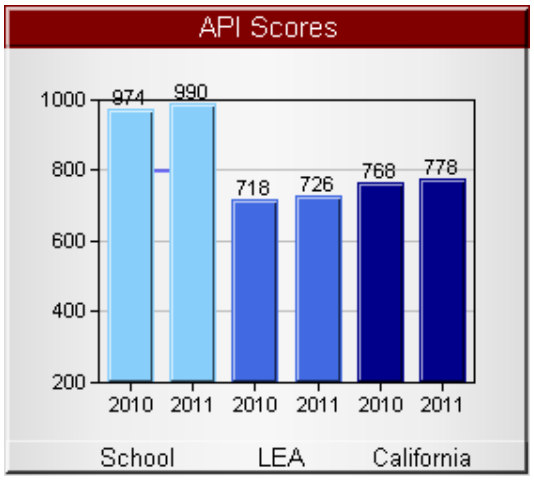


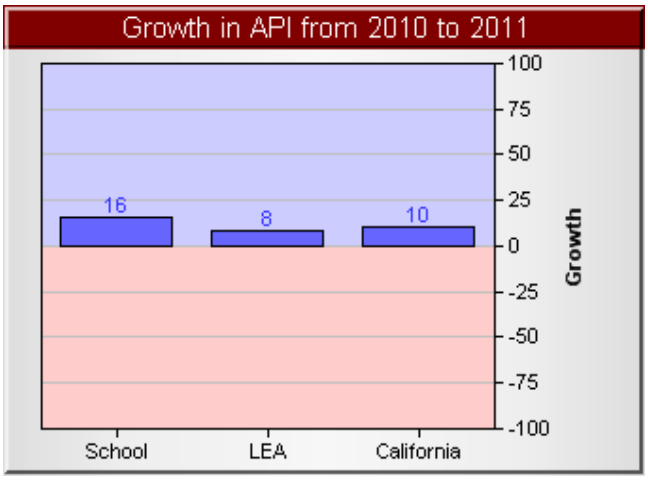
American Indian Public High School (grades 9-12)





American Indian Public Charter School II (grades 5-8)





Board Options:

Option 1: The Board may approve the application. The following language is provided for consideration:
Based upon review of the contents of the portfolio provided for this applicant and the information provided by the representatives of the applicant during consideration, and given it is within the sole discretion of the Board to approve or deny a charter, I move to approve the application and grant a charter to American Indian Model Schools to establish Tucson AIM Middle School charter school to serve grades 6-8. Any changes to the applicant prior to the contract signing or changes in the charter holder once the contract is signed must be made through the amendment process.

Option 2: The Board may deny the application package. Staff recommends the following language for consideration:
Based upon a review of the contents of the portfolio provided for this applicant and the information provided by the representatives of the applicant during consideration, and given it is within the sole discretion of the Board to approve or deny a charter, I move to reject the application and deny the request for a charter of American Indian Model Schools to establish a charter school for the reason that the applicant is not sufficiently qualified to operate a charter school due to the financial and operational performance of the applicant in operating other charter schools.

Appendix 1: List of follow-up items requested by OUSD Office of Charter Schools

Charter Renewal Site Inspection Follow-up Items
Requested by OUSD Office of Charter Schools, December 20, 2011

- Agendas/Minutes for All 10-11 and 11-12 Board Meetings
  - Document binder missing minutes for 12/12/11, 6/29/11, 6/23/11, 3/24/11
  - Posted agenda, minutes, materials, qualifications of provider of most recent summer Board training (2010)
- Conflict of Interest (Political Reform Act)
  - Fair Political Practices Commission Form 700s for current Board members; both initial and any subsequent annual filings
- Non-Profit Status / Tax Filings
  - IRS Form 990 for 07-08, 08-09, 09-10, for all AIM schools (whether as a single 501(c)(3) or separate)
  - Clarification of issue re: 501(c)(3) status of all AIM schools referenced in March 24, 2011 Board agenda and minutes
- Program Evaluation
  - Dr. Chavis's report on the program referenced in the July 14, 2011 Board meeting minutes as due by September 1, 2011
- Lease / Facilities Costs
  - All current and prior leases and lease amendments for AIPCS II campus, including agreement for AIM Schools to pay for construction costs as referenced in minutes of Board meeting of December 13, 2010
  - contract with Moyer Realty for facility services (PR), as referenced in March 24, 2011 Board minutes
- Pending Litigation / Legal Liabilities
  - Payroll tax embezzlement-status, including description of
  - Status of litigation referenced in Board meetings of March 24, 2011 and December 13, 2011 (Murphy case), including name of matter, current status, the resolution or estimate of the school's potential exposure (if not resolved)
  - Name of attorney present for closed session litigation items (per Brown Act)
- Student Retention
  - Spreadsheet of enrollment as of CBEDS day (October) by grade at AIPCS II for each year since opening (spreadsheet attached)
- Policies
  - Student withdrawal and transfer policy, as referenced in December 13, 2010 Board meeting
  - Current policies related to volunteers and visitors on campus
  - Adoption dates for all current policies
- Staffing
  - Teacher retention data for each year of the school's operation

1

- Description of current process for hiring
- Description of process for "on-boarding", including LiveScan, TB test and credential verification
- Current procedures for ensuring compliance with California Penal Code re: child abuse training and with Labor Code re: sexual harassment training
- Documentation regarding pension/retirement options for certificated employees (403(b) plan mentioned at Board focus group not referenced in Employee Handbook provided)
- Identification of employee groups eligible for PERS membership
- Professional development calendars for 2010-2011 and 2011-2012

- Fiscal Management Policies
  - Written policies or procedures describing controls for purchasing, checks, deposits, transfers, cash, credit cards, reconciliation of bank accounts, budget development, and similar standard financial "checks and balances"

Appendix 2: Notice of Concern

OAKLAND UNIFIED SCHOOL DISTRICT

Community Schools, Thriving Students

OFFICE OF CHARTER SCHOOLS

Ms. Kaytena Beckford, Site Coordinator
American Indian Public Charter School II
171 12th Street
Oakland, CA 94607

CERTIFIED MAIL/RETURN RECEIPT

November 22, 2011

NOTICE OF CONCERN: Addition of 5th Grade and Expanded Student Enrollment

Dear Ms. Beckford:

In late October of this year, American Indian Public Charter School II began operation of a 5th grade at its campus at 171 12th Street. As I discussed with Dr. Ben Chavis during my site visit of November 2nd, the manner in which this expansion (and enrollment of additional 6th and 7th grade students) was undertaken has raised many questions and concerns. Education Code Section 47604.3 requires charter schools to reply to reasonable inquiries from the authorizing district, or other authority:

> *47604.3. A charter school shall promptly respond to all reasonable inquiries, including, but not limited to, inquiries regarding its financial records, from its chartering authority, the county office of education that has jurisdiction over the school's chartering authority, or from the Superintendent of Public Instruction and shall consult with the chartering authority, the county office of education, or the Superintendent of Public Instruction regarding any inquiries.*

Pursuant to the legal authority described above, we hereby request that you respond to the following inquiries, in writing, by December 12, 2011.

A. E Occupancy Permit for Building

Although multiple requests have been made, OCS has not yet received a copy of the occupancy permit for the 12th Street building. With the increase in occupancy of the building – both the 5th grade for AIPCS II and the "Little Hands" independent school operating on the first floor – you must provide evidence of the school's compliance with Education Code Section 47610, as follows:

> *47610. A charter school shall comply with this part and all of the provisions set forth in its charter, but is otherwise exempt from the laws governing school districts, except all of the following: ....*
> *(d) The California Building Standards Code (Part 2 (commencing with Section 101) of Title 24 of the California Code of Regulations), as adopted and enforced by the local building enforcement agency with jurisdiction over the area in which the charter school is located.*

B. School Size and Grade Configuration

The charter for AIPCS II states at p. 6: "The AIPCS II will eventually serve 200 inner-city students in 5th through 8th grade." (Size and grades are repeated at pp. 7 and 8.) According to the attendance data submitted to OCS in October for the period ending October 14th, the enrollment of AIPCS II was 234 students in grades 6 through 8. Since that time, AIPCS II has added a 5th grade and, according to

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statements made by Dr. Ben Chavis on November 2, 2011, enrolled additional 6th and 7th grade students. Enrollment data just provided for the third period, shows the school now has a total of 282 students, including 23 5th graders, 11 more 6th graders, and 13 more 7th graders. The charter also describes, at p. 17, the areas of responsibility of the AIPCS II Governance Board, which include: school goals, personnel, budget development and approval, school calendar, and establishing and approving all major school policies. As the addition of a 5th grade in the 5th year of the charter, and expansion beyond the school size described in the charter, are major changes, please provide the following related to the decision to expand:

- Detailed current enrollment data provided in the enrollment spreadsheet that is part of the Fall Information Update (due October 17th).
- Any and all Governance Board agendas and minutes at which the expansion beyond 200 students was discussed and decided.
- Any and all Governance Board agendas and minutes at which the addition of a 5th grade was discussed and decided.
- A description of the planning undertaken for the addition of the 5th grade, including the rationale for including 5th grade in the program and the process for development of the curriculum and hiring of staff.
- A description of the Governance Board's rationale for opening the 5th grade on October 31st, rather than at the same time as the other grades, and for making additional 6th and 7th grade spaces available at that time.

C. Staffing

Education Code Section 47605(l) requires that charter schools hire credentialed teachers:

> *Teachers in charter schools shall hold a Commission on Teacher Credentialing certificate, permit, or other document equivalent to that which a teacher in other public schools would be required to hold. These documents shall be maintained on file at the charter school and are subject to periodic inspection by the chartering authority.*

In addition, the charter for AIPCS II states at p. 19: "AIPCS II will employ a teaching staff that holds appropriate California teaching certificates, permits or other documents issued by the Commission on Teacher Credentialing." The expansion of the school and new administrative personnel reported to OCS establish that changes have been made to staffing since the start of the school year. OCS requests information on teacher credentials in the staffing spreadsheet of the Fall Information Update, which is a part of OUSD's charter monitoring protocol. AIPCS II has not yet submitted the required information (although it was due October 17th). We therefore request the following information:

- Completed staffing spreadsheet, including teaching staff hired for the 5th grade position.

- A description of any and all staffing changes made at AIPCS between the start of the regular school year and the date of your response, including changes made to accommodate enrollment growth.
- Any and all Governance Board agendas and minutes at which administrative and teaching staff changes for the 2011-2012 school year were discussed and decided.

D. Instructional Days / Minutes

Education Code Section 47612.5 requires charter schools to meet specific minimum requirements for instructional minutes offered.

47612.5. (a) Notwithstanding any other provision of law and as a condition of apportionment, a charter school shall do all of the following:
(1) For each fiscal year, offer, at a minimum, the following number of minutes of instruction:
(A) To pupils in kindergarten, 36,000 minutes.
(B) To pupils in grades 1 to 3, inclusive, 50,400 minutes.
(C) To pupils in grades 4 to 8, inclusive, 54,000 minutes.
(D) To pupils in grades 9 to 12, inclusive, 64,800 minutes.
(2) Maintain written contemporaneous records that document all pupil attendance and make these records available for audit and inspection.

Given that AIPCS II did not start its 5th grade until October 31st, please provide the following information:

- A description of the school's plan for meeting the instructional minutes requirements of the Education Code for 5th grade.
- Copies of any and all correspondence with the California Department of Education regarding compliance with instructional minutes requirements.

E. Budget and Cash Flow Impacts

The addition of a 5th grade, the increase in enrollment at other grades, staff changes, purchase of furniture, materials and supplies, and occupancy of additional rooms in the 12th Street building all have potentially significant impacts on the school's budget and cash flow. To facilitate our oversight of the school's financial management, please provide OCS with the following:

- Copies of any and all financial analyses prepared for or reviewed by the Governance Board regarding the addition of 5th grade and expansion of enrollment (either separate or combined), including revenue and expense projections, cash flow projections, and analyses of potential revenue penalties for failure to meet instructional minutes requirements.
- Agendas and minutes of any and all meetings of the Governance Board, or any committees of the Governance Board, at which the financial impact of these program changes was discussed.

F. Recruiting and enrollment process; compliance with both charter and statute

The Education Code requires that charter schools refrain from discrimination in enrollment (Section 47605(d)(1)) and conduct random public lotteries (Section 47605(d)(2)(B)) when space is limited:

> *47605(d)(1): In addition to any other requirement imposed under this part, a charter school shall be nonsectarian in its programs, admission policies, employment practices, and all other operations, shall not charge tuition, and shall not discriminate against any pupil on the basis of the characteristics listed in Section 220.*
>
> *47605(d)(2)(B): However, if the number of pupils who wish to attend the charter school exceeds the school's capacity, attendance, except for existing pupils of the charter school, shall be determined by a public random drawing.*

The charter for AIPCS II also assures that its enrollment will be non-discriminatory and that a public random lottery will be used when applicants exceed the school's enrollment capacity (p. 23). The charter also states that, "Recruitment strategy will be carried out throughout various communities to provide families the opportunity to enroll in the school." It is not clear how the enrollment of 5th grade students and additional 6th and 7th grade students complied with these requirements. Please provide the following information:

- Description of the recruitment strategy employed for the addition of the 5th grade and expansion of the total enrollment, including dates and locations of recruitment events.
- Description of the process used for selecting students to be enrolled in the new 5th grade class, and for enrolling students in grades 6, 7 or 8th after the start of the school year.
- A copy of the student enrollment waiting list for all grades at AIPCS II as of October 1, 2011.
- Copies of any and all recruitment materials, application forms and enrollment documents used for the 2011-2012 school year, including those used for October enrollment in the new 5th grade.

G. Co-occupancy with "Little Hands"

Page 20 of AIPCS II's charter provides assurances regarding the health and safety of students, including commitments to staff training, fire and earthquake drills, security procedures for the building, and steps for the prevention of the child abuse. As a consequence of its expansion by grade and overall enrollment, AIPCS II is now occupying a portion of the first floor at its 12th Street building. As explained by Dr. Ben Chavis, as the landlord of the 12th Street building, he has also leased a portion of the first floor to a private school known as "Little Hands" serving students in grades K-4. As I observed on November 2nd, the lay-out of the classrooms has middle, elementary and pre-school students using some of the same common areas. Please provide the following information with respect to student health and safety, reflecting modifications made to procedures in light of the change in facilities at the end of October:

- A copy of the Private School Affidavit filed by Little Hands with the California Department of Education.
- A copy of the current safety plan for AIPCS II.
- Copies of any and all health and safety policies approved or amended by the Governance Board for AIPCS II.

- Any and all agendas and minutes of Governance Board meetings at which health and safety plans were discussed, or related policies adopted or amended.
- Copies or documentation of any and all agreements (written or oral) between AIPCS II and Little Hands regarding health and safety, including use of shared space, fire and earthquake safety procedures, and child abuse prevention.

Please submit your reply, in writing, via mail, hand delivery or email, by close of business on December 12, 2011, to:

Office of Charter Schools
Attention: Gail Greely
4551 Steele St., Room 11
Oakland, CA 94619
Gail.Greely@ousd.k12.ca.us

The Office of Charter Schools will provide a response in writing to the evidence provided by the school within twenty calendar days of receipt. The District reserves the right to pursue a Notice of Violation and charter revocation, pending the outcome of the requested response by the school.

Please contact the Office of Charter Schools if you have any questions.

Respectfully,

Gail Ann Greely
Coordinator, Office of Charter Schools

Cc: Michael Stember, Chairman, Board of Directors, American Indian Model Schools
c/o Pacific Edison, 1158 26th Street, Suite 606, Santa Monica, CA 90403

Appendix 3: Request for Extraordinary Audit

file

OAKLAND UNIFIED SCHOOL DISTRICT

Community Schools, Thriving Students

TONY SMITH, PH.D. Superintendent

November 23, 2011

Superintendent Sheila Jordan
Alameda County Office of Education
313 West Winton Avenue
Hayward, CA 94544

Re: Request for Extraordinary Audit

Dear Superintendent Jordan:

I am writing to request that the Alameda County Office of Education initiate an audit of the American Indian Model Schools (AIMS) charter school organization pursuant to Education Code §1241.5(c) and consistent with its authority under Education Code §47604.4(a). We make this request based on information developed by the District that constitutes reason to believe that fraud, misappropriation of funds, or other inappropriate fiscal practices have occurred, and merit examination.

In August 2011, the District was approached by an employee of American Indian Model Schools (AIMS) alleging conflict of interest, self-dealing and misappropriation of state and federal funds. (The employee has since left AIMS.) District staff sought to independently corroborate these allegations. On October 19, 2011, District staff met with Damon Smith and Teresa Kapellas of your office to outline the allegations and summarize the investigation to date. District staff also provided ACOE staff with copies of some relevant documents.

The allegations, which are discussed in more detail on the attached Addendum, relate primarily to the financial dealings of Dr. Ben Chavis, his wife and various business associates with the AIMS organization and other Oakland charter schools. Dr. Chavis has been deeply involved in the creation and operation of the three AIMS charter schools authorized by the District (American Indian Public Charter School 6-8, American Indian Public High School 9-12, and American Indian Public Charter School II 5-8). He has variously been identified (by himself and others) as the founder, director, or chief of the schools, although his formal position has not always been clear. Current and former employees of the schools have indicated to District staff that he routinely gave direction to the schools' official leadership, including the Executive Director and Site Coordinators. His wife, Marsha Amador, has served (or serves) as the accountant to AIMS, as well as providing accounting services to other charter schools in Oakland.

The specific allegations fall into three general categories: misappropriation of after-school program funds (ASES); fraudulent over-charging for charter school rent reimbursed through S.B. 740 charter school facilities funds; and violation of applicable conflict of interest disclosure requirements.

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tony.smith@ousd.k12.ca.us

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The District has not contacted the governing board or leadership of American Indian Model Schools regarding these allegations. Once further investigation by District staff found evidence corroborating some of the allegations, we chose to proceed cautiously in order to protect the then-employee from possible workplace retaliation and to reduce the potential for destruction or falsification of records. We acknowledge that the allegations of the former employee and the preliminary investigation undertaken by District staff to date do not prove that any illegal or unethical activity has taken place, but, in our view, the evidence collected does constitute reason to believe that such activities may have occurred and therefore merits further investigation by your office. The District will provide your staff with the results of its investigation to date and will cooperate fully. Gail Greely, Coordinator of the Office of Charter Schools, will be the primary contact for OUSD on this matter. Please keep her informed of your decision regarding conduct of an extraordinary audit, or any other investigation by your office.

Sincerely,

Tony Smith, Ph.D.
Superintendent

Attached: Addendum

copy: Board of Education
Maria Santos
Vernon Hal

ADDENDUM
REQUEST FOR EXTRAORDINARY AUDIT OF
AMERICAN INDIAN MODEL SCHOOLS
November 23, 2011

Fraudulent use of after-school program funds (ASES):

- The former AIMS employee alleges that funds from the ASES program were re-directed to a company owned by Dr. Chavis (ADS or American Delivery Systems) to fund an expansion of AIMS programs into Arizona. (The District has verified that AIMS has filed documentation in Arizona of its intent to do business there.) AIPCS II is the lead school for an ASES grant of $450,000 per year that includes two other Oakland charter schools: Conservatory of Vocal/Instrumental Arts (COVA) and East Oakland Leadership Academy (EOLA). The former employee alleges that the other two schools were paid significantly less than their $150,000 share of ASES funds and that some portion of the balance was paid out to Dr. Chavis's company, ADS. The District has confirmed the amount of the grant allocations, the underpayments to COVA and EOLA (attested to by the leaders of those charter schools), and has been provided by the former employee, with evidence of a large payment to ADS. The District also has a copy of one of the MOUs for the grant management, which does not support the large diversion of funds (which exceed allowable administrative overhead in the ASES program.) The former employee says that Dr. Chavis asked that the diversion of funds be covered up by providing the leaders of COVA and EOLA with a falsified report claiming the funds were shared among four (4) schools instead of three (3). The former employee also alleges that the AIPCS II after-school program knowingly failed to meet ASES requirements.
- Another AIMS school, AIPCS , receives ASES funds as part of another group of schools led by Oakland Unity High School. The former employee alleges that AIPCS claimed and received funds for a substantial period when no program was in operation and knowingly failed to meet ASES requirements. The former employee alleges that falsified reports were filed regarding the program at the direction of Dr. Chavis. The District has been able to confirm that grants were awarded for the program and that Oakland Unity passes through the funds to the AIMS schools, but does not itself operate the ASES programs at the other sites.

Fraudulent over-charging for charter school rent reimbursed through S.B. 740 charter school facilities funds:

- The former employee alleges that the three AIMS charter schools all occupy properties owned or leased by Dr. Chavis or by companies owned by him, his wife or close associates, and that rents being collected by Dr. Chavis from the schools are in excess of reasonable market rates. (The possible violation of conflict of interest standards related to such transactions is addressed below.) All three AIMS schools collect reimbursement from the state for a portion of their lease payments under the Charter School Facilities Grant Program (S.B. 740). Dr. Chavis has publicly identified himself as the "landlord" for AIPCS II and has held other positions with the school. The District has been able to confirm connections between Dr. Chavis's companies and the properties leased by AIPCS and AIPHS (including a lease with Dr. Chavis's company, ADS). The District has also looked at the assessed valuation of the properties and gathered data on market rates for similar properties. This data suggests that the lease rates may be excessive.

- The District also learned in the course of its investigations that Dr. Chavis is the landlord for the Oakland Unity High School. (The Executive Director of Oakland Unity, told the District that Dr. Chavis has a lease with the church that owns the property and sublets to the school.) This school also collects S.B. 740 funding to reimburse it for facilities costs. The District has reviewed master and sublease documentation with ADS, but has not been able to determine the reasonableness of the rent charged to the school. Dr. Chavis is a former board member for Oakland Unity High School (as disclosed by Oakland Unity on its IRS Form 990).

Violation of applicable conflict of interest disclosure requirements:

- The information above regarding ASES funds and lease payments establish that Dr. Chavis has business relationships with the AIMS schools, with which he has long been associated. In addition to these, the former employee has alleged the following:
    - Dr. Chavis's wife, Marsha Amador, serves as the accountant for AIMS schools, and for some other charter schools in Oakland. (She interacts with the District's finance staff and signs reports on behalf of these schools.) The former employee alleges that her annual salary for this is $150,000, plus use of a school-owned car. (The former employee alleges that Dr. Chavis also receives use of a car and paid life insurance.)
    - AIMS schools make payments to Dr. Chavis's company, ADS, for a summer enrichment program known as SAIL (Stanford Academic Institute of Learning – the District has confirmed that there is no official affiliation with Stanford University). The individual listed on correspondence as the director of this program, Larry Martinez, is a former AIMS board member. Documentation related to these transactions has been provided by the former employee.
- As indicated above, Dr. Chavis has variously described himself as "chief", "founder", "director" or "just the landlord" for the schools. Dr. Chavis may therefore be a "disqualified person" within the context of the IRS regulations on "excess benefit transactions" because he "was in a position to exercise substantial influence over the affairs" of the school. The most recent publicly-posted Form 990 does not disclose any financial dealings with possible "disqualified persons", including Dr. Chavis, Ms. Amador or Mr. Martinez.
- In addition, the charters for the AIMS schools state that they will comply with the Political Reform Act. The transactions described above may be in violation of conflict of interest provisions of PRA, depending on the positions held by these individuals at the time. The former employee and another former senior manager of AIMS have informed the District that Form 700 disclosure forms were not regularly prepared and submitted by leaders of the organization.

Appendix 4: Authorization of Extraordinary Audit

Alameda County Office of Education

Sheila Jordan
Superintendent

Damon Smith
Associate Superintendent
Business Services

Movetia Salter
Chief Human Resources Officer

Naomi Eason
Assistant Superintendent
Educational Services

Robert Crose
Assistant Superintendent
Student Programs and Services

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Hayward, California
94544-1136

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www.acoe.org

CONFIDENTIAL

December 5, 2011

Anthony Bridges, Deputy Executive Officer
Fiscal Crisis Management and Assistance Team
Kern County Superintendent of Schools
1300 17th Street
Bakersfield, CA 93301

RE: Request for Investigation of the American Indian Model Schools (AIMS) Charter School Organization

Dear Mr. Bridges,

I am requesting the Fiscal Crisis and Management Assistance Team (FCMAT) conduct an investigation based upon the provisions of Education Code Section 47604.4, allowing a County Superintendent of Schools to conduct an investigation into the operations of a charter school based upon written complaints by parents or other information that justifies the investigation, and 1241.5 (c), allowing a County Superintendent of Schools to review or audit the expenditures and internal controls of any charter school in his or her county if he or she has reason to believe that fraud, misappropriation of funds, or other illegal fiscal practices have occurred that merit examination.

Superintendent Tony Smith of the Oakland Unified School District has requested our office initiate an audit of the American Indian Model Schools (AIMS) charter school organization. His request is based on allegations received from a former AIMS employee concerning fraud and/or misappropriation of funds. Therefore, I am requesting that FCMAT conduct an investigation to validate the sufficiency of evidence of these allegations.

Attached for your review is a copy of the following information we have received from the Oakland Unified School District:

- Request letter from Superintendent Smith highlighting the allegations,
- concerns presented to ACOE by OUSD on October 19, 2011,
- complaint OUSD received on August 26, 2011, and
- additional documentation that OUSD has collected to date (i.e. lease agreements, etc.)

I look forward to hearing from you soon to discuss the necessary actions needed to proceed with this investigation. ACOE's main contact for this investigation will be Teresa Kapellas, Charter Schools Office Manager, at (510) 670-4272. Please contact her at your earliest convenience to schedule a meeting.

Sincerely,

Sheila Jordan, Superintendent
Alameda County Office of Education

cc: Dr. Tony Smith, Superintendent, Oakland Unified School District
Damon Smith, Associate Superintendent, Business Services, ACOE
Teresa Kapellas, Manager, Charter Schools Office, ACOE
Mary Hernandez, Esq., GCR, LLP, Legal Counsel to ACOE

Enclosures