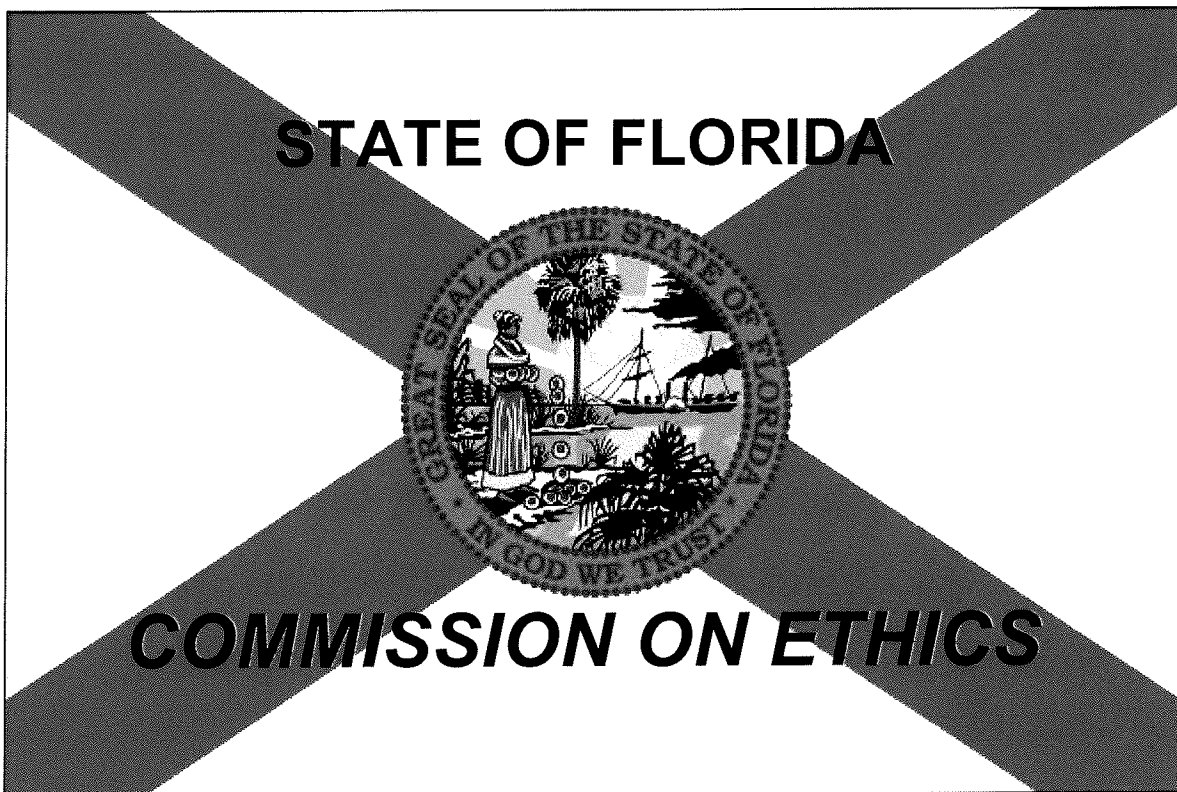


REPORT OF INVESTIGATION



Complaint Number 23-002

NOTICE CONCERNING CONFIDENTIALITY

This report of investigation concerns an alleged violation of Chapter 112, Part III, Florida Statutes, or other breach of public trust under provisions of Article II, Section 8, Florida Constitution. The Report and any exhibits may be confidential (exempt from the public records law) pursuant to Section 112.324, Florida Statutes, and Chapter 34-5, F.A.C., the rules of the Commission on Ethics. Unless the Respondent has waived the confidentiality in writing, this report will remain confidential until one of the following occurs: (1) the complaint is dismissed by the Commission; (2) the Commission finds sufficient evidence to order a public hearing; or (3) the Commission orders a public report as a final disposition of the matter. *See Section 112.3215, Florida Statutes, regarding executive branch lobbying matters and confidentiality.

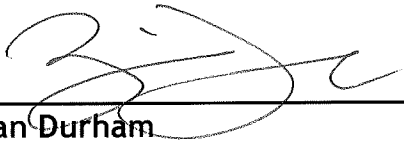
STATE OF FLORIDA
COMMISSION ON ETHICS
Post Office Drawer 15709
Tallahassee, Florida 32317-5709

REPORT OF INVESTIGATION

TITLE: LORI CUNNINGHAM
Polk County School Board Member
Bartow, Florida

COMPLAINT NO.: 23-002
Exhibits A through L

INVESTIGATED BY:




Brian Durham

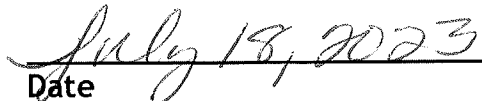
Distribution:

Commission on Ethics
Respondent
Advocate
File

Releasing Authority:



Kerrie J. Stillman
Executive Director



Date

* * * *

**REPORT OF INVESTIGATION
COMPLAINT NO. 23-002**

(1) Mr. Billy Townsend of Lakeland, Florida, alleges that Ms. Lori Cunningham, a member of the Polk County School Board, violated the Code of Ethics for Public Officers and Employees.

(2) The complaint alleges that the Respondent owns Applied Images, Inc., and that Applied Images, Inc., is doing business with Dundee Elementary Academy Magnet School, a public school, by selling mandated school uniforms to the school. The complaint indicates that the Respondent's corporation is listed as one of the three suppliers of the school uniforms on the school's website.

(3) The complaint also alleges that the Respondent's corporation is doing business with Bok Middle Academy and Lake Wales High School, which are charter schools in the District, by selling mandatory school uniforms to the schools and/or the parents. The complaint alleges that Bok Middle Academy's Facebook page stated that the mandated polo shirts could be purchased at the Respondent's business and that the school's website stated that the school's official apparel could be purchased either at the Respondent's business or another local business. The complaint also alleges that a screenshot from the Lake Wales High School Facebook page reflects that the Respondent's company (Applied Images, Inc.) is identified as the official uniform shop for the school.

(4) The Executive Director of the Commission on Ethics noted that based upon the information provided in the complaint, the above-referenced allegations were sufficient to warrant a preliminary investigation to determine whether the Respondent's actions violated Section 112.313(3), Florida Statutes (Doing Business with One's Agency) and Section 112.313(7)(a), Florida Statutes (Conflicting Employment or Contractual Relationship).

(5) The Complainant, Mr. Townsend, stated he was elected to the Polk County School Board in 2016 and served along-side the Respondent until he completed his term in 2020. The Complainant said that, while he served on the Board, he heard rumors, discussions and informal complaints that the Respondent was acting as the sole vendor of school uniforms for Lake Wales Charter Schools (LWCS), but, at the time, he was unable to research it. He said he wrote an article for his online blog (Exhibit A) in 2021 addressing the lack of transparency regarding transactions between Applied Images and schools within the Polk County School Board District, including LWCS. In an email sent by the Complainant to the Respondent prior to the article, he notified the Respondent that he planned to write an article about her "uniform supply relationship" with LWCS because he had "heard about it for a long time . . . and now had the chance to delve into it." The Respondent replied to the email stating, "To answer your question, I do not have a contractual relationship with any of the Lake Wales Charter Schools, that would create a continuing or frequently recurring conflict." (Exhibit B)

(6) After researching the Respondent's business relationships with multiple charter schools under LWCS (Lake Wales High School, Edward W. Bok Academy South, and Edward W. Bok Academy North) and one public Polk County School (Dundee Elementary

Academy), the Complainant stated he found clear evidence of the schools identifying the Respondent's business as a vendor to contract to purchase school uniforms. Lake Wales High School (LWHS), he said, actually named the Respondent's business, Applied Images, Inc., as the school's "official uniform shop." (Page 7 of the complaint) The Complainant said that, the Facebook posts he viewed from the schools that directed students to purchase mandated school uniforms from the Respondent's business suggested a guaranteed revenue stream to the Respondent.

(7) Mr. Robin Gibson, attorney for Respondent and General Counsel for LWCS, explained that LWCS, Inc., is a not-for-profit organization that operates a collection of charter schools. He stated that LWCS is governed and operated by a Board of Directors. Mr. Gibson said that LWCS receives the same per-student allotment from Florida Education Finance Program (FEFP) that Polk County Schools (PCS) receive for public schools. He stated that PCS does not control the LWCS budget, how LWCS expends funds, or LWCS contracts. Mr. Gibson stated that he has researched questions concerning the Respondent doing business with LWCS in the past and has not found it to be a conflict of interest (Exhibit C). He said that he recently re-evaluated whether his opinion regarding the Respondent's business relationship with LWCS has changed since he first researched the matter and advised he sent a letter (Exhibit D) to the Respondent, which states:

In my opinion, you would have a conflict of interest if you did business with the agency that you serve as a public officer. You do not have a conflict of interest while doing business with an agency that you do not serve as a public officer. Also, you do not have a conflict of interest while doing business with individuals (who have the right of freedom to contract under the Florida Constitution) who make their own voluntary and independent decisions as to where they decide to purchase their merchandise. In order to avoid the appearance of a conflict, I recommend that you not do business with individuals attending Polk County Public schools, even though those individuals would technically be able to make their own independent choices.

(8) The Respondent, interviewed in the presence of her attorney, Mr. Robin Gibson, stated that she has been a Polk County School Board Member since 2004 and she's the owner of Applied Images, Inc. She said she has been the President of Applied Images since its incorporation in 2011. When Applied Images was formed in 2011, the Respondent said, her business partner was Karen Hunt. She said when they realized that there were no vendors in the Lake Wales area that were doing embroidery work, she and Ms. Hunt began offering that service. In 2014, the Respondent said, she and her husband purchased Ms. Hunt's portion of the business, and, from that point on, she (Respondent) has been the sole owner of Applied Images, Inc. She stated that she does not have any employees and that she runs the business herself.

(9) The Respondent advised that she sought counsel prior to entering into the Memorandum of Understanding (Exhibit E) she made with LWHS because, as a School Board member, she did not want there to be any questions about the agreement. She stated that Mr. Gibson, who also served as the Chair of LWCS in 2012, opined there was no conflict of interest (Exhibit C). The Memorandum of Understanding, she explained, permitted her to sell LWHS uniforms. She stated that uniforms she makes are not sold on LWCS campuses. The Respondent said she only makes uniforms for LWHS, Bok North, and Bok South. She said she has never sold uniforms directly to any LWCS school and has only sold uniforms to the parents of students. Dundee Elementary Academy (DEA), she said, is a public school located not far from her business location and she discovered that some parents came to Applied Images to purchase a Bok uniform also inquired about purchasing a DEA uniform from her for their other child(ren) attending DEA. The Respondent said that, at first, she turned those parents away, telling them that she did not have the logo to create DEA uniforms. However, after turning parents away multiple times, she said, she received the logo from the principal of DEA, Dr. Lana Tatom-Headley, and, for a short time period, she created uniforms for the students at DEA who lived in the Lake Wales area. Though she didn't have records to confirm the sales, the Respondent stated that her DEA uniform sales did not exceed \$500 in a calendar year. A DEA uniform polo can be purchased at Applied Images for \$22.75-\$26.75 depending on the size of the shirt.

(10) The Respondent denied having sold uniforms to DEA for students that could not afford them. Rather, she said she has gifted uniforms to students at DEA who could not afford a uniform. The Respondent stated that she has never had a contract or agreement with DEA to sell uniforms. She acknowledged that she makes uniforms for both Bok North and Bok South, but said she has no agreement with those schools and only sells the uniforms to the parents of the students. The Respondent maintains that none of the LWCS schools have ever sold her uniforms on their campuses. She said that it is possible that her former partner, Ms. Hunt, in the early years of their business, may have visited campuses and sold uniforms during orientation, but maintains she (Respondent) has never represented Applied Images on any campus to sell uniforms.

(11) The Respondent advised that she keeps her business open late during orientation to accommodate those families who can come to Applied Images to try on a shirt and purchase uniforms following orientation. She stated that she "has never received money from any of the schools for any uniform sales." The Respondent maintains that no school has ever purchased products from Applied Images directly, although she acknowledged that the Students In Transition (SIT) program for LWHS have made purchases from Applied Images¹. She said she has no direct knowledge about SIT funding.

(12) The Respondent said that when Ms. Donna Dunson served as principal of LWHS, she (Dunson) occasionally ordered uniforms from her for students and she (Dunson) advised that when the student came to Applied Images for the uniform, to put it on her (Dunson's) tab which she (Dunson) paid with a personal credit card. She said she has no knowledge if Ms. Dunson ever reimbursed herself through school funds.

¹ The Students In Transition program will be explained later in this document.

(13) Mr. Frederick Heid advised that he has served as the Polk County Superintendent of Schools for the past two years. PCS, he advised, has adopted a formal dress code policy requiring uniforms for elementary and middle schools. Mr. Heid advised that School Advisory Council committees determined the uniform colors and styles for each school. He said that school uniforms may be obtained from many different locations and vendors and, specifically, because some families have reduced incomes, families are not required to purchase uniforms from a specific vendor. Mr. Heid stated that a vendor desiring to do business with a PCS school must apply to PCS and agree to certain terms and conditions that protect the schools.

(14) Mr. Heid stated that he was not aware of any agreement between the Respondent's business (Applied Images) and any PCS school but, he stated, he is aware that the business provides uniforms for some charter schools in the area. He said any such agreement would be between the LWCS and Applied Images and not through PCS. Mr. Heid advised that LWCS operates under the "umbrella" of PCS and is considered a "sponsored" Local Education Authority. He said that LWCS obtains its funding through the FEFP in the same manner as does PCS schools. Some funding to LWCS passes through PCS and some funding LWCS obtains directly, he advised. Mr. Heid provided, as an example, that Lake Wales High School, a LWCS school, is located in an older facility owned by PCS. If any major renovation or significant repair required, he said, PCS would participate in and assist in the repair to maintain the building. LWCS does not pay rent to PCS, he said, because state statutes allow sponsored charter schools to use vacant County facilities. Mr. Heid stated that "the District, as the authorizer [of Lake Wales Charter Schools], has to ensure that the charter school is performing academically, that there are no unethical practices going on at the school, and that the school is financially solvent. If those three conditions are met, then the charter school is automatically renewed [when it is time to renew the sponsorship]."

(15) Mr. Heid stated that he is not aware of Applied Images ever serving as a sole source for uniforms at DEA. DEA, he said, has never purchased uniforms from Applied Images. Further, he said he has no knowledge of Applied Images ever selling uniforms on any PCS school campus. Mr. Heid said that PCS only advises parents that uniforms are required but never directs parents to purchase them from a certain vendor. He said that each PCS school can provide the information for parents on where to purchase uniforms with no requirement to use a certain vendor.

(16) Mr. Heid stated that the issue concerning the Respondent possibly doing business with local schools first arose before he became the Superintendent. Mr. Heid said it is his understanding that there was a point of contention wherein the Complainant (during his term as a Board Member) recused himself from voting on matters involving LWCS (due to a family relationship he had with the LWCS General Counsel) and he (Complainant) believed the Respondent should abstain from votes involving LWCS because she was doing business with some of the charter schools.

(17) Mr. Charles Wesley "Wes" Bridges, II, stated he has served as the General Counsel to the Polk County School Board since 1998. Mr. Bridges stated that, pursuant to Section 1002.33, Florida Statutes, local school boards serve as the primary sponsors of charter

schools. He stated that school districts are limited, as sponsors, in the extent to which they can become involved in the day-to-day operations of charter schools. Mr. Bridges stated that LWCS has a Board of Trustees and that PCS has no role in the day-to-day operation, management, or oversight of the charter schools under LWCS. He noted that between 1998 and 2000, when Glen Reynolds served as the Polk County Superintendent of the Schools, he (Reynolds) led an initiative that mandated uniforms in schools and PCS adopted the recommendation.

(18) Mr. Bridges said he is unaware of any agreements between Applied Images and any PCS school. He stated that although there may be an "appearance issue" with Applied Images selling uniforms to the families of DEA students, if the school only creates a list of vendors without specifically directing families to Applied Images, he believes there is no conflict. Mr. Bridges said that, to his knowledge, Applied Images has never been the sole source for uniforms for any PCS school. PCS principals, he advised, do not have the authority to enter into a contract directly with a vendor to provide uniforms for their school. Mr. Bridges stated that parents decide where to purchase school uniforms.

(19) Dr. Wayne Rodolfich stated that he has served as the Superintendent of LWCS since July 2022. He confirmed that uniforms are mandatory for all LWCS schools. Dr. Rodolfich stated that he is unaware of any agreements between the Respondent's company and any LWCS school, but said that each LWCS school has full autonomy to decide where uniforms can be purchased. He stated that both Applied Images and Original Ink provide uniforms for schools within the LWCS. Dr. Rodolfich said that he has visited Applied Images personally, as a parent, to purchase uniforms and has also used Applied Images for a personal reading campaign he developed. He also recalled having heard that Applied Images provides a scholarship to one of the charter schools within LWCS but he does not know any specifics related to that. Dr. Rodolfich opined that a majority of the charter schools within LWCS work with vendors that can provide uniforms in a timely manner. He confirmed that PCS sponsors LWCS, but maintains that LWCS has the autonomy to function without any guidance from PCS. Dr. Rodolfich explained that LWCS is required to apply to PCS to renew its charter (typically every 15 years) and that LWCS's recent renewal requests were unanimously approved by the PCSB. He stated that Polk County School Board votes on the extension of the charter schools as well as any improvement plans when necessary.

(20) Dr. Rodolfich stated that Applied Images is not currently the sole provider of uniforms to LWCS, though he was not aware if they ever were in the past. He said that he does not know if any school purchased uniforms from Applied Images in the past, but stated it is his understanding that only the parents of LWCS students have purchased the uniforms and not the schools themselves. Dr. Rodolfich advised that some LWCS schools maintain a "used" uniform closet to provide to students who are unable to obtain uniforms for themselves. He said he is not aware of Applied Images ever visiting a school during orientation events to sell uniforms. He noted that LWCS has a homeless and migrant student population they assist by providing them with uniforms.

The Allegation that Applied Images is Doing Business with Lake Wales High School

(21) Ms. Donna Dunson stated she was the principal for LWHS for approximately 10 years (she retired in July 2022). Prior to that, she advised, she worked at Bok Academy before it was split into two schools (Bok North and Bok South). She confirmed that both schools are a part of LWCS. Ms. Dunson also confirmed that uniforms are mandated by LWCS and have been since its inception. She said that around 2011, LWHS began using Applied Images as a uniform provider. Ms. Dunson said that there were other potential providers in the area, but, at that time, she decided to do business only with Applied Images, Inc. and Polka Dots & Co. She could not recall the specific details of the agreement reached with Applied Images but confirmed that a "Memorandum of Understanding" was reached between LWHS and Applied Images for Applied Images to return a portion of its proceeds back to the school. Mr. Anuj Saran, the current principal of LWHS, she advised, retained those records and helped to facilitate the agreement.

(22) Ms. Dunson confirmed that LWHS considered Applied Images to be its official uniform shop and encouraged its students to purchase their uniforms solely from Applied Images. She confirmed that Applied Images returned a portion of their uniform sales proceeds back to LWHS and also provided funding for an academic scholarship (Page 7 of the complaint).

(23) Ms. Dunson advised that students could purchase uniforms from Applied Images in two ways. During orientation, she said, Applied Images set up a table at LWHS and sold uniforms or the students could go directly to the Applied Images storefront to purchase uniforms. Ms. Dunson could not recall the exact dates that Applied Images set up tables at LWHS to sell uniforms, but said that it was prior to the pandemic. Ms. Dunson recalled that someone once mentioned to the Polk County School Board that the Respondent was conducting business with various LWCS schools. She said that she contacted LWCS General Counsel Gibson and she believes he (Gibson) contacted Polk County School Board General Counsel Wes Bridges. Together, she said, she believes they researched the matter but noted that LWHS continued to use Applied Images as a uniform provider. Ms. Dunson confirmed that LWHS also had other vendors that provided uniforms to students. However, she stated, LWHS continued to recommend Applied Images to students because Applied Images agreed to return a portion of its proceeds to the school and "helped students who couldn't afford it [a uniform]."

(24) Mr. Anuj Saran stated he has served as the principal for LWHS since July 2022. Prior to that, he advised, he was the Assistant Principal of LWHS for 10 years. Mr. Saran said there was a Memorandum of Understanding (Exhibit E) between LWHS and Applied Images in 2011 that permitted Applied Images to sell the approved uniforms, and "Friday" shirts.

(25) Mr. Saran said that LWHS has a program called Students In Transition (SIT) which has purchased uniforms from Applied Images and then provides those uniforms to the LWHS homeless student population. Mr. Saran stated that, initially, LWHS provided vouchers to the homeless population so those students could obtain uniforms. The vouchers, he said, were paid for with donations received by private donors. However, Mr. Saran stated, now that

LWHS has formed SIT, the SIT program works in place of the vouchers. The SIT program, he advised, is funded by private donors and helps to provide for various needs of the homeless student population at LWHS. Additionally, Mr. Saran noted that another account, the "Uniform Fund Account," is also used by LWHS to make purchases of apparel from Applied Images that it maintains on campus in the event a student needs a uniform. He said that the Uniform Fund Account is funded by the school's "Friday" shirt sales sold at local stores like Walgreens or CVS. "Friday" shirts, he explained, are t-shirts that promote the LWHS name and mascot in school colors.

(26) Mr. Saran provided this investigator with financial records (Exhibit F) reflecting purchases three LWCS schools (LWHS, Bok North, and Bok South) had made from Applied Images. The records reflect payments made to Applied Images from 2011 to the present. The records reveal that from January 5, 2018² to present day, LWHS has paid a total of \$16,886.58 to Applied Images. Appended as Exhibit G, is a chart showing all sales by Applied Images to LWHS covering fiscal years 2017 through 2023. Mr. Saran also included the Applied Images invoices (Exhibit H) for payments made during fiscal year 2022-2023, which correlate to the payments on the financial document (Exhibit F) he provided. Among the documents provided, Mr. Saran included a purchase order (Exhibit I) reflecting payments approved to be paid to Applied Images by LWHS during fiscal year 2022-2023.

(27) Mr. Saran specifically recalled an award ceremony in the past when a scholarship was presented to a LWHS student by Applied Images. However, he said the scholarship did not identify Applied Images as the school's "official uniform shop." He noted the school uses other vendors for uniforms, but acknowledged Applied Images is conveniently located near the school. Mr. Saran stated that LWHS "does not require the parents to go and buy uniforms from them [Applied Images] or from anyone else." He denied that uniforms are sold by LWHS, but acknowledged that Applied Images, and other vendors providing uniforms, were on campus to sell uniforms to students prior to the pandemic. "This [vendors selling their uniforms on campus during orientation] is just more convenient for families," he said. Mr. Saran stated that the school typically notifies parents where they can purchase uniforms through flyers and Facebook, but noted that uniform vendors also provide flyers that are available in the school office.

(28) Upon review of the financial document provided by Mr. Saran (Exhibit F), the records reflect a purchase made by LWHS from Applied Images on October 2, 2020, invoice number 1721003312, in the amount of \$650.00 for "LW MASKS LWH." This investigator found a Facebook post (Exhibit J) on the LWHS Facebook page, dated November 13, 2020, stating that LWHS was selling facemasks to generate funds for the school's 2021 graduation. In the comments section of the Facebook post it is noted that the masks could be purchased in the LWHS office.

(29) Ms. Brittani Douberly, Finance Secretary for LWHS, stated by telephone that she began working at LWHS during the summer of 2022. She said when LWHS gear is sold at select participating stores (Walgreens, CVS, Publix), LWHS receives a percentage of the

² The Commission on Ethics has a five-year Statute of Limitations from the date the complaint was filed (January 5, 2023).

sales. Ms. Douberly stated that the revenue from those sales is deposited into the LWHS "Uniform Fund" internal account. Ms. Douberly explained that, listed on the invoices (Exhibit H), are two accounts from which LWHS pays Applied Images for purchases, i.e., the SIT Fund Account, she said, ending in 32092, and the Uniform Fund Account, ending in 33058. In the purchase order (Exhibit I), Ms. Douberly said, the two accounts are listed in detail with the approved amounts from each account to be spent at Applied Images during LWHS fiscal year 2022-2023.

(30) Ms. Douberly stated that all the purchases on the financial record (Exhibit F) made from Applied Images with the letters "...LWH" in the name of the description, were made with funds coming from LWHS. She advised that, although there are multiple accounts paying for uniforms funded by outside sources, fundraising, and donations, the funds belong to LWHS. Ms. Douberly stated that before any purchase is made, it must be approved by the principal (Saran). She stated that when the item arrives, LWHS provides the invoice to the LWCS office for processing and payment. Ms. Douberly advised that the LWCS office prepares the checks to pay vendors and "Lake Wales Charter Schools" is the name listed on the check.

The Allegation that Applied Images is Doing Business with Edward W. Bok Academy South

(31) Mr. Damian Rosado advised he has served as the principal of Edward W. Bok Academy South since January 2022. Mr. Rosado stated that he is not aware of any agreement between Bok South and Applied Images to provide uniforms for the school and maintains that Applied Images has not been a vendor for Bok South while he has been employed there. Mr. Rosado acknowledged that Bok South purchases uniforms from vendors and the school, in turn, sells the uniforms to the students. Mr. Rosado explained that Bok South prefers to sell the uniforms to students directly because the profits are used to benefit the students. He stated that no vendor has ever sold uniforms on the school campus.

(32) Contrary to Mr. Rosado's statement, financial records (Exhibit F) provided by Mr. Saran, reflect that Bok South has made uniform purchases from Applied Images during the time that Mr. Rosado has been principal. The records (Exhibit F) indicate a purchase on September 15, 2022, Invoice Number 9000000782, in the amount of \$1,066.76, for "POLO SHIRTS FOR BOK S."

(33) As with all the charter schools in the LWCS system, Bok South provides the invoice to the LWCS office for processing and payment. The LWCS office prepares the checks to pay vendors and "Lake Wales Charter Schools" is the name listed on the check. The check is signed by either the LWCS CFO, Alricky Smith, or the LWCS Superintendent of Schools, Wayne Rodolfich.

The Allegation that Applied Images is Doing Business with Edward W. Bok Academy North

(34) Ms. Donna Drisdom advised she has served as the principal of Edward W. Bok Academy North since 2019. Ms. Drisdom stated that when she became employed at Bok North, an established relationship already existed between the school and Applied Images. Ms. Drisdom recalled having met with the Respondent about the school uniforms. She said that Bok North has never had an exclusive agreement with Applied Images and said Bok North does not receive any proceeds from uniform sales. Ms. Drisdom stated that since she has served as the principal at Bok North, Bok North has never purchased uniforms from Applied Images.

(35) Contrary to Ms. Drisdom's statement, financial records (Exhibit F) provided by Mr. Saran, reflect that Bok North made uniform purchases from Applied Images during the time Ms. Drisdom has been principal. The records (Exhibit F) indicate two purchases. The first, on January 19, 2022, Invoice Number 1621000233, in the amount of \$470.00, was for "DRI FIT JACKETS BOK N." The second, on September 13, 2022, Invoice Number 9000000783, in the amount of \$1,066.76, was for "POLO SHIRTS FOR BOK N."

(36) As with all the charter schools in the LWCS system, Bok North provides the invoice to the LWCS office for processing and payment. The LWCS office prepares the checks to pay vendors and "Lake Wales Charter Schools" is the name listed on the check. The check is signed by either the LWCS CFO, Alricky Smith, or the LWCS Superintendent of Schools, Wayne Rodolfich.

The Allegation that Applied Images is Doing Business with Dundee Elementary Academy

(37) Dr. Lana Tatom-Headley stated that she has served as the principal for Dundee Elementary Academy (DEA) for the past six years. She stated that DEA is an International Baccalaureate (IB) accredited magnet public school within PCS. Dr. Tatom-Headley stated that parents are made aware during orientation, through the school's website and through information provided to students, that the school has a uniform requirement. She said that initially, the school contacted multiple vendors about supplying uniforms. Only one company, she said, Ray Graphics, responded. However, when it was determined it took Ray Graphics too long to produce the shirts for the families of the school, parents asked if they could have access to the digital file of the school's logo so they could have uniform shirts made themselves. Dr. Tatom-Headley said that at some point, someone approached Applied Images and asked them if they would be willing to make shirts for the school. The school, she said, ultimately had four or five vendors who made shirts for the school, and one of those vendors was Applied Images. This past year, she advised, due to a change in the IB branding guidelines, DEA changed its logo and IB positioning on the uniforms which led them to re-contact its vendors. Dr. Tatom-Headley said DEA currently uses Travelers Custom Printing for all of its uniforms. Travelers, she advised, is an approved vendor for PCS.

(38) Dr. Tatom-Headley maintains that Applied Images has never served as the sole uniform vendor for DEA. She said that prior to this year (2023), DEA's website contained a list of vendors so parents could choose where to purchase their uniforms (Exhibit K). However, following the change in the positioning of the logos on the uniform, the only vendor with the ability to make the uniforms at an affordable price was Travelers Custom Printing. Dr. Tatom-Headley said that during this time the DEA website was changed (Exhibit L). She said that she has no recollection of DEA ever directly purchasing uniforms from Applied Images. However, she recalled a couple of instances when a family could not afford a uniform for their student, and she (Tatom-Headley) contacted the Respondent to obtain uniforms. Dr. Tatom-Headley recalled one time visiting Applied Images to pick-up shirts and one time Applied Images delivered shirts to DEA. Dr. Tatom-Headley stated that neither the Respondent, nor Respondent's business, Applied Images, ever came to DEA to sell uniforms. She said that DEA has only provided information to students about companies that will embroider shirts and where students can go to purchase uniforms. Dr. Tatom-Headley said DEA attempts to promote local businesses and make the uniforms affordable to the families. She said that DEA never had any agreement with a specific vendor. Dr. Tatom-Headley stated that families unable to afford uniforms have been able to receive uniforms through private donor donations provided by the Parent Teacher Association (PTA), herself personally, and through the generosity of other teachers. She said that DEA also collects gently worn uniforms to be reused by the students.

END OF REPORT OF PRELIMINARY INVESTIGATION

EXHIBIT A

EXHIBIT A

Public Enemy Number 1

How much does Lake Wales Charter force families to pay School Board Chair Lori Cunningham's business?

A Polk County case study in how transparency makes for better policy and enhances public trust.



BILLY TOWNSEND
JUL 8, 2021



4



Share



In my time on the Polk County School Board, I tried very hard to set a standard for and establish a culture of *transparency* — both at the elected official and staff levels. I had some success; and I made some enemies in the process. That's part of taking the power the public gives an elected official seriously — and then acting on it.

In one example, I always tried to make clear to folks my warm family relationship to my cousin Robin Gibson. Robin is the father of Lake Wales Charter and long served as its chief legal counsel. When the board had dealings with LWC — and we had many during my term — I always tried to remember to publicly declare that Robin and I share a close family bond. (Robin's mother and my grandmother were sisters.)

There was never any financial relationship between us, other than I stayed at his house for a few months when I moved to Polk County in 1999. But I thought our personal relationship was important context for the public to consider in assessing my performance as a board member in regards to LWC issues.

“Purchase from ... Applied Images”


Board Chair Lori Cunningham has taken a different approach.

The image below is from June 29th. Edward W. Bok Academy North is a “conversion” charter school that is part of the Lake Wales Charter organization/network. “Applied Images” is School Board Chair Lori Cunningham’s company.



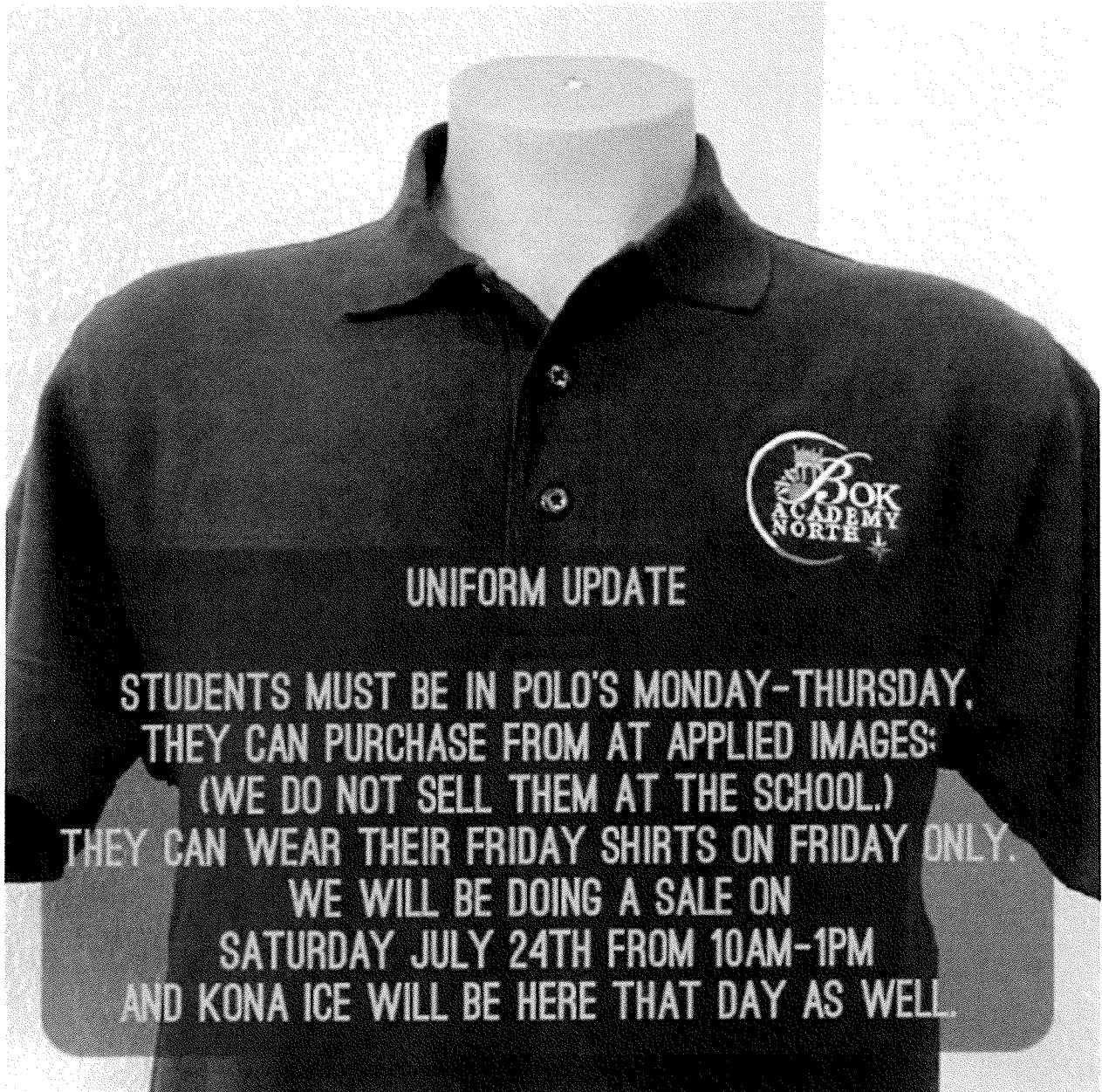
Edward W. Bok Academy North



1h • 

Uniform Update

Students must be in polo's
Monday-Thursday, they can purchase from at
Applied Images; (we do not sell them at th...
[See More](#)



 12

9 Comments • 7 Shares



Various folks over the years have told me that Lori's business — Applied Images — sells mandatory uniform apparel to the students of at least some Lake Wales Charter Schools. She never discussed this as a board member; and I never bothered to track it down or ask about it publicly because I just didn't have time and didn't need to hijack a board discussion with imprecise information.

A few weeks back, *before* that Bok North Facebook post appeared, I sent Lori and the board as a whole a note. I am now a self-appointed beat writer for the Polk School Board; and I asked Lori if she would discuss her business dealings with LWC so I could report on them. Here's how she responded:

To answer your question, I do not have a contractual relationship with any of the Lake Wales Charter Schools, that would create a continuing or frequently recurring conflict.

I didn't ask about "conflict." The rules concerning conflict are difficult to parse. I was interested in *disclosure* — in a piece of knowledge the public should have. Detailing Lori's business relationship with LWC would make clear the personal business incentives she might have to behave in a certain way toward LWC. The same concept goes for anyone else on the board or in government. The public should know your incentives if it gives you power.

Lynn Wilson always abstained from Polk State College votes

For comparison, Board Member Lynn Wilson always abstained from votes involving Polk State College's charter schools — and I think, all other Polk State-related votes — because he's an employee of the college.

Again, it's not at all clear to me that he was legally obligated to do it. I don't know the rules and law well enough. But just the act of doing it gave the public a clear window into how the personal and public intersected for him in doing his School Board job. I always admired that.

The Bok North post about apparel only mentions one vendor — Lori's *Applied Images*. That certainly suggests a guaranteed revenue stream. I sent a second note to Lori a few days ago asking for more detail about the Bok North/LWC business relationship discussed in that post. She has not answered me yet; and she's under no obligation to answer me at all.

But I do think it's useful for the public as a whole to have this basic knowledge. And it would be appropriate, in my view, for the public to know how much money LWC has forced its families to pay to the School Board Chair's personal business over the years.

I encourage Lori to disclose that amount — and disclose any ongoing relationships the next time a LWC issue comes before the board.

EXHIBIT B

EXHIBIT B

Durham, Brian

From: Billy Townsend <townsendsubstackpe1@gmail.com>
Sent: Wednesday, May 17, 2023 7:41 PM
To: Durham, Brian
Subject: Fwd: Congratulations - and a question for Lori

Here is Lori's email response to me as requested.

----- Forwarded message -----

From: **Cunningham, Lori** <lori.cunningham@polk-fl.net>
Date: Thu, Apr 29, 2021 at 3:15 PM
Subject: Re: Congratulations - and a question for Lori
To: Billy Townsend <townsendsubstackpe1@gmail.com>
CC: Bridges, Wes <wes.bridges@polk-fl.net>

Hi Billy,

Thanks for the positive feedback on our superintendent selection! We are all very happy to welcome Mr. Heid to Polk County Public Schools!

To answer your question, I do not have a contractual relationship with any of the Lake Wales Charter Schools, that would create a continuing or frequently recurring conflict.

Take care and I hope you and your family are doing well.

Regards,
Lori

Lori Cunningham, Chairman of the Board
School Board Member, District 2
Polk County Public Schools
P.O. Box 391
Bartow, FL 33831
(863) 534-0529

On Apr 28, 2021, at 9:11 AM, Billy Townsend <townsendsubstackpe1@gmail.com> wrote:

CAUTION: This email originated OUTSIDE of Polk County Schools. DO NOT CLICK LINKS or OPEN ATTACHMENTS unless you recognize the sender and know the content is safe.

Hi all. Congrats on making what I think will be a very good hire for a very uncertain era full of peril and possibility. FWIW, Heid and Towns were my top two picks and I would have been very pleased with either. I think the FSBA did a good job; and I'm proud of helping set the search in motion.

Lori, I'm going to be writing something about your uniform supply relationship with Lake Wales Charter. I've heard about it for a long time; and now I have a chance to delve into it. I am, of course, the self-appointed beat writer for the Polk School District. :)

If you'd like to call me to discuss, my number is 813-404-7420 or the old 863-209-4037.

Again, congrats all on a successful search. The outcome is quite vindicating and gratifying for me as a former board member. And if any of you have important stories you'd like covered as we move ahead, I hope you'll consider calling me.

Thanks,

Billy

EXHIBIT C

EXHIBIT C

Conflict of Interest, School Uniform Shirts

1 message

Robin Gibson <r.gibson@gibsonlawfirm299.com>

Wed, Mar 7, 2012 at 3:03 PM

To: "Barnhardt, April" <april.barnhardt@lwcharterschools.com>, "Barrow, Jennifer" <jennifer.barrow@lwcharterschools.com>, "Dunson, Donna" <Donna.dunson@lwcharterschools.com>, "Henson, Kenneth" <Kenneth.henson@lwcharterschools.com>, "Hunt, Debbie" <Debbie.hunt@lwcharterschools.com>, "Jackson, Jesse" <jackson@lwcharterschools.com>, "Kendrick, Eugene" <Eugene.kendrick@lwcharterschools.com>, "Lynne, Beverly" <Beverly.lynne@lwcharterschools.com>, "Medders, Susie" <smedders@lwcharterschools.com>, "Moses, Damien" <Damien.Moses@lwcharterschools.com>, "Obryant, Metta" <Metta.obryant@lwcharterschools.com>, "Quam, Gail" <Gail.quam@lwcharterschools.com>, "Reams, Chris" <Chris.reams@lwcharterschools.com>, "Saran, Anum" <Anuj.saran@lwcharterschools.com>, "Shick, Daniele" <Daniele.Shick@polk-fl.net>, "Tyler, Elizabeth" <Elizabeth.tyler@lwcharterschools.com>, "Whitaker, Steven" <Steven.whitaker@lwcharterschools.com>, "Cain, Pat" <pat.cain@raymondjames.com>, "Denmark, Cassandra" <cassandra@mEEKSDenmarklaw.com>, "Fasel, Terry" <terry.fasel@warner.edu>, "Gill, Danny" <dannygill.nfh@verizon.net>, "Stepp, Candice" <candice.stepp@lwcharterschools.com>, "Ullman, David" <david.ullman@bticpa.com>, "Wadsworth, Keith" <kwadsworth@petersonmyers.com>, "Wojcik, Betty" <betty@lakewaleschamber.com>

Folks,

Merissa Green of the *Ledger* called yesterday to ask about a conflict of interest issue that has apparently risen during the Lori Cunningham campaign for reelection to her school board seat. The claim is that Lori Cunningham has a conflict of interest when Applied Images Inc, a company in which she has an interest, sells school shirts to the Lake Wales charter schools. Since the issue involves our schools, I want to set out some guidelines for our use as we exercise the Rule of Good Judgment.

1. *We cannot tolerate a conflict of interest.* We've come too far with spotless audits and exemplary handling of our finances to have anything jeopardize our reputation for top fiscal management. (I suspect Lori doesn't want a conflict any more than we do.)
2. To my knowledge, the high school is the only school involved in the issue. At the beginning of the high school's uniform policy, Donna consulted me concerning her arrangement for authorizing providers for the school shirts. She decided to authorize two local businesses. Applied Images was one of the providers. This resulted in benefitting the local economy while at the same time giving the purchasers a choice. I thought it was a good decision.
3. Purchaser's money. As long as the purchase comes from the individual's money and not school money, there is no conflict.
4. Loan Fund. In some cases the high school has loaned money to student families for part of the purchase. In these instances, the purchase is still coming from the individual and thus there is no conflict --- but it's getting closer.
5. Trust Fund. The Memorandum of Understanding (attached) also requires the providers to pay a commission on sales to be held by the high school to "provide uniform scholarships to families in

need of financial assistance or other student needs.” Once again, such purchases are not coming from school funds and is not a conflict --- but it’s grist for inquiry.

6. Since our local Board of Trustees (and not the Polk County School Board) has the ultimate responsibility for the management of our charter schools, the likelihood of a conflict with a school board member is slim, but it still exists. (We did have one close call. Back in September Lori voted on an issue concerning three of our schools having to do with the purchase of assets. As it turns out, the three schools involved were elementary schools and didn’t involve the high school.)

7. The bottom line is that our schools should not use school money to purchase anything from a company in which a school board member has an interest. This applies to the Polk School Board as well as our own Board of Trustees. Even if the price we get is at or below market and the service is above competition, the appearance of buying favor from a public official still exists. While It’s true that it’s the kind of thing that usually arises at election time, we just don’t want to be placed in that position at any time.

I’m grateful to Merissa for reviewing the facts and checking for accuracy.

If you have any questions, please call.

Robin

Robin Gibson



Gibson Law Firm	Robin Gibson is
299 E. Stuart Ave.	Board Certified in both
Lake Wales, FL 33853	Civil Trial Law and
Tel: 863-676-8584	Business Litigation Law
Fx: 863-676-0548	by the Florida Bar
r.gibson@gibsonlawfirm299.com	
Website: www.gibsonlawfirm299.com	

EXHIBIT D

EXHIBIT D

From: robin.gibson
Sent: Friday, April 30, 2021 12:54 PM
To: lori.appliedimagesinc.com
Subject: Legal Opinion

GIBSON LAW FIRM

April 30, 2021

Dear Mrs. Cunningham,

You asked me to look into your business relationship with the Lake Wales charter schools to see if there is any legal or ethical conflict of interest.

As you recall, this issue arose about 10 years ago. I looked into it at the time because I didn't want either you or the charter schools to be involved with a conflict circumstance. I concluded there was no conflict of interest at the time, and now I have looked into it again to see if anything has changed.

The controlling statute is the same as before – FS 112.313. The relevant factors:

- The Polk County school board and the Lake Wales charter schools are separate agencies of state government. The PCSB is an agency by virtue of the Florida Constitution, while the LWCS is a Local Education Agency (LEA) by virtue of statute.
- The PCSB and the LWCS are operated by separate boards with separate budgets. You are a board member (“public officer”) of the PCSB, but not a board member of the LWCS board.
- Both the PCSB and the LWCS operate under the same laws and regulations as imposed by the Florida legislature.
- Your business (“Applied Images”) applies logos and insignia on clothing at customer request. You sell polo shirts with school insignia to parents in the Lake Wales area who need the shirts for their students to comply with the charter school requirements for school uniforms.
- There are other businesses in the area offering the same goods and services. The public and the schools are free to use any of these businesses for their school apparel, and each enjoys its own customer base.
- You do not have a “contractual relationship” with either the PCSB or the LWCS or any of its schools. There is a lack of exclusivity of using Applied Images as a vendor for

D1

school related goods. You do not advertise (other than your website and a Facebook page) in local media or in the schools.

- Your business is primarily with individuals who initiate the sale by coming to your shop. On a few occasions, Lake Wales High School has come to you to purchase clothing with school funds for students of poverty who are unable to make the purchase themselves.

In my opinion, you would have a conflict of interest if you did business with the agency that you serve as a public officer. You do not have a conflict of interest while doing business with an agency that you do not serve as a public officer. Also, you do not have a conflict of interest while doing business with individuals (who have the right of freedom to contract under the Florida Constitution) who make their own voluntary and independent decisions as to where they decide to purchase their merchandise. In order to avoid the appearance of a conflict, I recommend that you not do business with individuals attending Polk County Public schools, even though those individuals would technically be able to make their own independent choices.

Kind Regards,

Robin Gibson

P.O. Box 551 | Lake Wales, Florida 33859
Tel: 863-676-8384 | Fx: 863-676-0548
robin.gibson@gibsonattorneys.law
www.GibsonAttorneys.law



Robin Gibson is Board Certified in both Civil Trial Law and Business Litigation Law by the Florida Bar

EXHIBIT E

EXHIBIT E

Memorandum of Understanding

This MEMORANDUM OF UNDERSTANDING is hereby made and entered into by and between Lake Wales High School (LWHS); Polka Dots & Co.; and Applied Images, Inc on **July 26, 2011**.

A. PURPOSE:

The purpose of this Memorandum of Understanding (MOU) is to establish a mutually agreeable framework for cooperatively fulfilling the uniform sales for the students of LWHS.

B. STATEMENT OF MUTUAL BENEFIT AND INTERESTS:

All parties to the MOU agree that it is to their mutual interest and benefit to work cooperatively to sell the approved Lake Wales High School uniform shirts/polos and other clothing items.

C. BOTH UNIFORM PROVIDERS WILL:

1. Agree to sell the approved shirts at the price of \$17.75/unit plus any applicable sales tax.
2. Neither party will extend discounts without coming to a mutual agreement with all principal contacts listed below or their designee.
3. Remit a 5% commission to Lake Wales High School on all uniform polo shirt sales.
4. Remit Lake Wales High School a 10% commission on all uniform sweat shirts, and jackets, with the LW logo.
5. Agree to sell Friday shirts with proprietary designs provided by the school or vendor designed shirts to LWHS for resale. In the event, a uniform provider sells the Friday shirts directly to families, the providers agree to remit the spread between the vender price and LWHS set price for items sold at their respective point of sales to LWHS. *If vendor price is \$7 and LWHS sets the price at \$10, vendor will remit \$3 per t-shirt to LWHS.*
6. The sale price for all Friday shirts will be set exclusively by LWHS regardless of the point of sale.
7. Agree to work with LWHS to help families in dire need.

D. LAKE WALES HIGH SCHOOL WILL:

1. Inform all parents and families that the abovementioned vendors are the only approved uniform providers.
2. Use all commissions earned to provide uniform scholarships to families in need of financial assistance or other student needs.
3. Reserve the right to have Friday and Sports shirts sourced by any vendor of choice.

E. PRINCIPAL CONTACTS. The principal contacts for this instrument are:

Name /Title/Organization	Signature	Address
Donna Dunson Principal – Lake Wales High School		#1 Highlander Way Lake Wales, FL 33853 Ph: 863-678-4222
Keri Hunt Proprietor – Applied Images Inc		1156 N. Scenic Highway, Lake Wales, FL 33853 Ph: 863-678-8047
Karrie Wallace Proprietor – Polka Dots & Co.		224 Stuart Avenue, East Lake Wales, FL 33853 Ph: 863-676-7315

EXHIBIT F

EXHIBIT F

Vendor Invoice Inquiry



Vendor Number:

Vendor Name: APPLIED IMAGES, INC.

Vendor Address: 1156 N Scenic Hwy, Lake Wales, FL 33853-3249

Vendor Detail

Invoice History



From Invoice Date: / / Only Outstanding: Records Per Page:



Batch Number	Invoice Number	Invoice Date	Due Date	Invoice Amount	Invoice Balance	Discount Date	Discount Balance	PO Number	Description	Outg
46392	1721115549	03/08/2023	04/07/2023	65.25	0.00	03/08/2023	0.00	0	POLO UNIFORM LWH	
46326	1721115522	02/28/2023	03/30/2023	336.00	0.00	02/28/2023	0.00	0	HOODIES LWH	
46326	1721115523	02/28/2023	03/30/2023	217.50	0.00	02/28/2023	0.00	0	POLO - SIT LWH	
45453	1721113397	12/05/2022	01/04/2023	69.82	0.00	12/05/2022	0.00	0	SIT- POLO SHIRTS LWH	
45453	1721113396	11/08/2022	12/08/2022	80.00	0.00	11/08/2022	0.00	0	DRI FIT MEN JACKET LWH	
45086	#HELD	10/27/2022	11/26/2022	672.00	0.00	10/27/2022	0.00	0	LW HOODIES LWH	
44590	9000000782	09/15/2022	10/15/2022	1,066.76	0.00	09/15/2022	0.00	0	POLO SHIRTS FOR BOK S	
44590	9000000783	09/13/2022	10/13/2022	1,066.76	0.00	09/13/2022	0.00	0	POLO SHIRTS FOR BOK N	
45186	1721113312	08/12/2022	09/11/2022	150.00	0.00	08/12/2022	0.00	0	BAND STAFF POLO W/LOGO LWH	
43112	9000000685	04/22/2022	05/22/2022	9,153.66	0.00	04/22/2022	0.00	0	POLO SHIRT FOR SIT	
42808	1721110043	03/31/2022	04/30/2022	186.00	0.00	03/31/2022	0.00	95827	shirts dance LWH	
42668	1721110024	03/14/2022	04/13/2022	406.00	0.00	03/14/2022	0.00	95468	SHIRTS LWH	
42686	1721110025	02/15/2022	03/17/2022	150.00	0.00	02/15/2022	0.00	0	shirts LWHS	
42295	1721009943	02/02/2022	03/04/2022	100.00	0.00	02/02/2022	0.00	95468	SHIRTS LWH	
42143	1621000233	01/19/2022	02/18/2022	470.00	0.00	01/19/2022	0.00	0	DRI FIT JACKETS BOK N	
42159	1721009917	01/14/2022	02/13/2022	134.25	0.00	01/14/2022	0.00	95468	OPEN PO SHIRTS LWH	
41964	1721008875	12/09/2021	01/10/2022	140.25	0.00	12/09/2021	0.00	95468	SIT - SHIRTS LWH	
41768	1721008857	11/15/2021	12/15/2021	500.00	0.00	11/15/2021	0.00	95468	SHIRTS LWH	
41287	1721007768	10/12/2021	11/11/2021	50.00	0.00	10/12/2021	0.00	95468	OPEN PO SHIRTS LWH	
40959	1721007721	09/14/2021	10/14/2021	168.00	0.00	09/14/2021	0.00	95468	OPEN PO SHIRTS LWH	
39780	1721006623	05/18/2021	06/17/2021	6,600.00	0.00	05/18/2021	0.00	95003	SIT STUDENT UNIFORMS LWH	
39540	1721005597	05/03/2021	06/02/2021	102.00	0.00	05/03/2021	0.00	94726	uniforms LWH	
39395	1721005586	04/19/2021	05/19/2021	175.00	0.00	04/19/2021	0.00	94726	uniforms LWH	
39253	1721005578	04/06/2021	05/06/2021	327.75	0.00	04/06/2021	0.00	94726	uniforms LWH	
38987	1721005548	03/01/2021	03/31/2021	177.75	0.00	03/01/2021	0.00	94726	uniforms LWH	
38830	1721005521	02/16/2021	03/18/2021	305.75	0.00	02/16/2021	0.00	94726	uniforms LWH	
38314	1721004434	12/02/2020	01/01/2021	350.00	0.00	12/02/2020	0.00	94726	uniforms LWH	
38314	1721004425	12/01/2020	12/31/2020	50.00	0.00	12/01/2020	0.00	94726	uniforms LWH	
38314	1721004428	11/20/2020	12/20/2020	115.00	0.00	11/20/2020	0.00	0	LW HOODIES LWH	
37779	1721003312	10/02/2020	11/01/2020	650.00	0.00	10/02/2020	0.00	0	LW MASKS LWH	
35995	1721001169	02/19/2020	03/20/2020	79.42	0.00	02/19/2020	0.00	0	SHIRTS-NEW ACADEMY COACH LWH	
35995	1721001197	02/19/2020	03/20/2020	150.00	0.00	02/19/2020	0.00	93130	LWHS UNIFORM PURCHASES LWH	
35847	1721001156	02/06/2020	03/07/2020	169.00	0.00	02/06/2020	0.00	93129	SIT UNIFORMS LWH	
35733	1721001116	02/03/2020	03/04/2020	209.25	0.00	02/03/2020	0.00	93130	UNIFORM PURCHASES LWH	
35733	1721001117	02/03/2020	03/04/2020	40.00	0.00	02/03/2020	0.00	93129	SIT UNIFORMS LWH	
35356	1721000983	12/06/2019	01/05/2020	84.25	0.00	12/06/2019	0.00	93130	UNIFORM PURCHASES LWH	
35356	1721000988	12/06/2019	01/05/2020	84.25	0.00	12/06/2019	0.00	93129	SIT UNIFORMS LWH	
35154	1721000939	11/15/2019	12/15/2019	379.00	0.00	11/15/2019	0.00	93129	SIT UNIFORMS LWH	
35075	1721000888	11/14/2019	12/14/2019	42.80	0.00	11/14/2019	0.00	93130	UNIFORM PURCHASES LWH	
35007	1721000881	11/01/2019	12/01/2019	50.00	0.00	11/01/2019	0.00	93129	SIT UNIFORMS LWH	
34744	1721000865	10/09/2019	11/08/2019	288.00	0.00	10/09/2019	0.00	0	SHIRTS TECH TEAM LWH	
34744	1721000868	10/02/2019	11/01/2019	300.00	0.00	10/02/2019	0.00	93130	LWHS UNIFORM PURCHASES LWH	
34744	1721000930	09/24/2019	10/24/2019	180.00	0.00	09/24/2019	0.00	93130	LWHS UNIFORM PURCHASES LWH	
34381	1721000787	09/18/2019	10/18/2019	50.00	0.00	09/18/2019	0.00	93130	UNIFORM PURCHASES LWH	
34266	1721000749	08/29/2019	09/28/2019	196.00	0.00	08/29/2019	0.00	0	POLO SHIRTS LWH	
34266	1721000760	08/19/2019	09/18/2019	188.96	0.00	08/19/2019	0.00	0	STAFF POLO SHIRTS LWH	
33965	1721000723	08/07/2019	09/06/2019	529.50	0.00	08/07/2019	0.00	0	POLO SHIRTS LWH	

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33038	1721000573	04/22/2019	05/22/2019	40.00	0.00	04/22/2019	0.00	19376	STUDENTS SHIRTS FOUND LWH
32784	1721000514	04/17/2019	05/17/2019	68.00	0.00	04/17/2019	0.00	0	T-SHIRTS LWH
32784	1721000507	04/08/2019	05/08/2019	88.00	0.00	04/08/2019	0.00	0	ROYAL BLUE POLO LWH
32640	1721000488	03/12/2019	04/11/2019	25.00	0.00	03/12/2019	0.00	19376	STUDENTS SHIRTS FOUND LWH
32476	1721000455	03/08/2019	04/07/2019	530.50	0.00	03/08/2019	0.00	0	POLO SHIRTS LWH
32368	1721000451	03/06/2019	04/05/2019	25.00	0.00	03/06/2019	0.00	19375	SIT UNIFORMS LWH
32368	1721000452	03/06/2019	04/05/2019	138.25	0.00	03/06/2019	0.00	19376	STUDENTS SHIRTS FOUND LWH
32368	1721000433	03/04/2019	04/03/2019	84.53	0.00	03/04/2019	0.00	19376	STUDENTS SHIRTS FOUND LWH
32118	1721000336	02/28/2019	03/30/2019	225.00	0.00	02/28/2019	0.00	19376	STUDENTS SHIRTS FOUND LWH
32369	1601000124	02/19/2019	03/21/2019	229.00	0.00	02/19/2019	0.00	92726	ARCHERY PARENT SHIRTS BOK
32213	1721000364	02/11/2019	03/13/2019	493.75	0.00	02/11/2019	0.00	19375	SIT UNIFORMS LWH
32118	1721000335	02/04/2019	03/06/2019	42.80	0.00	02/04/2019	0.00	19375	SIT UNIFORMS LWH
32118	1721000338	01/28/2019	02/27/2019	25.00	0.00	01/28/2019	0.00	19376	STUDENTS SHIRTS FOUND LWH
32118	1721000355	01/25/2019	02/24/2019	200.00	0.00	01/25/2019	0.00	0	POLO SHIRTS LWH
31940	1601000087	01/12/2019	02/11/2019	833.40	0.00	01/12/2019	0.00	92582	ARCHERY TEE' SCREEN PRINT BOK
31751	1721000303	12/27/2018	01/26/2019	1,172.00	0.00	12/27/2018	0.00	92572	BEST BUDDIES SHIRTS LWH
31532	1721000276	12/04/2018	01/03/2019	84.25	0.00	12/04/2018	0.00	19376	STUDENTS SHIRTS LWHS
31255	1721000202	11/02/2018	12/02/2018	100.00	0.00	11/02/2018	0.00	19376	LWHS STUDENTS SHIRTS FOUND
31255	1721000203	10/30/2018	11/29/2018	25.00	0.00	10/30/2018	0.00	19376	LWHS STUDENTS SHIRTS FOUND
31255	1721000204	10/30/2018	11/29/2018	75.00	0.00	10/30/2018	0.00	19375	SIT UNIFORMS LWH
31102	1721000177	10/22/2018	11/21/2018	50.00	0.00	10/22/2018	0.00	19376	LWHS STUDENTS SHIRTS LWH
31102	1721000149	10/18/2018	11/17/2018	175.00	0.00	10/18/2018	0.00	19375	SIT UNIFORMS LWH
30719	1721000041	09/14/2018	10/14/2018	132.00	0.00	09/14/2018	0.00	0	POLO SHIRTS LWH
30564	26962	09/06/2018	10/06/2018	25.00	0.00	09/06/2018	0.00	19375	SIT UNIFORMS LWH
30564	26913	09/05/2018	10/05/2018	79.00	0.00	09/05/2018	0.00	19376	STUDENTS SHIRTS LWH
30564	26963	09/05/2018	10/05/2018	39.50	0.00	09/05/2018	0.00	19375	SIT UNIFORMS LWH
30564	26914	08/30/2018	09/29/2018	400.00	0.00	08/30/2018	0.00	0	POLO SHIRTS LWH
30564	26910	08/29/2018	09/28/2018	149.25	0.00	08/29/2018	0.00	19376	STUDENTS SHIRTS LWH
30564	26908	08/25/2018	09/24/2018	327.50	0.00	08/25/2018	0.00	19376	STUDENTS SHIRTS LWH
30564	26909	08/25/2018	09/24/2018	158.50	0.00	08/25/2018	0.00	19376	STUDENTS SHIRTS LWH
29574	26562	05/11/2018	06/10/2018	128.40	0.00	05/11/2018	0.00	19013	SCIENCE TEAM HATS BOK
29368	26318	04/17/2018	05/17/2018	104.00	0.00	04/17/2018	0.00	18764	UNIFORMS LWH
29119	26213	03/06/2018	04/05/2018	25.00	0.00	03/06/2018	0.00	18764	UNIFORMS LWH
29119	26213LWH	03/06/2018	04/05/2018	25.00	0.00	03/06/2018	0.00	18769	UNIFORMS SIT LWH
29043	26114	03/02/2018	04/01/2018	150.00	0.00	03/02/2018	0.00	18764	UNIFORMS LWH
29043	26115	03/02/2018	04/01/2018	25.00	0.00	03/02/2018	0.00	18769	UNIFORMS SIT LWH
29119	26212	02/16/2018	03/18/2018	48.00	0.00	02/16/2018	0.00	0	EMBROIDER LOGO LWH
28988	26070	02/14/2018	03/16/2018	320.00	0.00	02/14/2018	0.00	0	DESIGN-DIGITIZE LC LOGO LWH
28886	26009	02/06/2018	03/08/2018	106.00	0.00	02/06/2018	0.00	18764	UNIFORMS HOODIES LWH
28886	26022	02/05/2018	03/07/2018	220.00	0.00	02/05/2018	0.00	18796	ACADEMIC COACH SHIRTS LWH
28886	26010	02/01/2018	03/03/2018	186.96	0.00	02/01/2018	0.00	0	GOLF SIGN LHA
28886	26064	02/01/2018	03/03/2018	1,488.00	0.00	02/01/2018	0.00	0	T-SHIRTS HIGHLANDER LWH
28708	26002	12/07/2017	01/06/2018	102.00	0.00	12/07/2017	0.00	0	LW HOODIES SIT LWH
28708	26003	12/07/2017	01/06/2018	225.00	0.00	12/07/2017	0.00	0	LW HOODIES LWH
28392	25812	11/28/2017	12/28/2017	415.25	0.00	11/28/2017	0.00	0	LW HOODIES
28229	25765	11/01/2017	12/01/2017	65.00	0.00	11/01/2017	0.00	0	LW HOODIE -JACKET MENS LWH
28079	25699	10/02/2017	11/01/2017	275.00	0.00	10/02/2017	0.00	0	LW HOODIE LWH
26770	25166	04/18/2017	05/18/2017	289.50	0.00	04/18/2017	0.00	17167	UNIFORM PURCHASE LWH
26419	25020	03/01/2017	03/31/2017	203.85	0.00	03/01/2017	0.00	17685	SIGNS FOR GOLF TRNMNT (LHA)
26255	24891	02/06/2017	03/08/2017	544.90	0.00	02/06/2017	0.00	17167	UNIFORM PURCHASE LWH
26255	24892	02/06/2017	03/08/2017	275.00	0.00	02/06/2017	0.00	0	BLACK HOODIES LWH
26255	24893	02/06/2017	03/08/2017	1,074.28	0.00	02/06/2017	0.00	0	POLO SHIRTS LWH
26149	24840	01/19/2017	02/18/2017	239.50	0.00	01/19/2017	0.00	17167	UNIFORM PURCHASES LWH
26065	24801	01/04/2017	02/03/2017	1,014.00	0.00	01/04/2017	0.00	17167	UNIFORM PURCHASES LWH
25910	24668	12/02/2016	01/01/2017	225.00	0.00	12/02/2016	0.00	17167	UNIFORM -HOODIES LWH
25818	24626	11/10/2016	12/10/2016	514.50	0.00	11/10/2016	0.00	17167	UNIFORM PURCHASE LWH
25910	24717	11/02/2016	12/02/2016	243.50	0.00	11/02/2016	0.00	0	POLO'S SIT PROGRAM LWH
25818	24627	11/02/2016	12/02/2016	80.50	0.00	11/02/2016	0.00	0	SIT PROGRAM LWH
25732	24617	11/02/2016	12/02/2016	924.75	0.00	11/02/2016	0.00	17167	UNIFORM PURCHASE LWH
25732	24607	10/21/2016	11/20/2016	50.00	0.00	10/21/2016	0.00	0	BLACK HOODIES LWH
25596	24512	10/21/2016	11/20/2016	50.00	0.00	10/21/2016	0.00	0	T-SHIRTS SIT PROGRAM LWH

25596	24545	10/21/2016	11/20/2016	739.65	0.00	10/21/2016	0.00	17167	UNIFORM PURCHASE LWH
24332	1017	05/04/2016	06/03/2016	378.59	0.00	05/04/2016	0.00	16696	GOLF TOURN. SIGNS LHA
24139	23764	04/07/2016	05/07/2016	614.50	0.00	04/07/2016	0.00	0	TEE-HOODIES & POLOS LWH
23664	23477	02/04/2016	03/05/2016	458.00	0.00	02/04/2016	0.00	0	HOODIES WITH LOGO LWH
23590	23415	01/12/2016	02/11/2016	760.00	0.00	01/12/2016	0.00	0	SWEATSHIRTS LWH
23511	233356	01/06/2016	02/05/2016	288.00	0.00	01/06/2016	0.00	15986	UNIFORM SHIRTS LWH
23293	23294	11/13/2015	12/13/2015	62.25	0.00	11/13/2015	0.00	15986	UNIFORM SHIRTS LWH
22845	22915	09/16/2015	10/16/2015	208.00	0.00	09/16/2015	0.00	0	T-SHIRTS FOR CAFE STAFF LWH
23293	23293	09/11/2015	10/11/2015	225.00	0.00	09/11/2015	0.00	15986	UNIFORM SHIRTS LWH
22742	22847	09/02/2015	10/02/2015	1,015.00	0.00	09/02/2015	0.00	0	STAFF POLO'S LWH
22742	22848	09/02/2015	10/02/2015	128.25	0.00	09/02/2015	0.00	0	POLO FOR Q. JOHNSON LWH
14065	6872	12/07/2011	01/06/2012	25.00	0.00		0.00	0	INTERACT T-SHIRTS LWH
13822	6616	11/09/2011	12/09/2011	314.25	0.00		0.00	11843	UNIFORMS VIA HOMELESS GRT. LW
13955	6708	10/21/2011	11/20/2011	569.00	0.00		0.00	11983	T-SHIRTS FOR INTERACT CLUB LWH
13520	6216	09/07/2011	10/07/2011	5,882.33	0.00		0.00	0	DRESS CODES SUPPLIES LWH
13384	6139	08/03/2011	09/02/2011	297.00	0.00		0.00	0	33 CHORUS CAMP T-SHIRTS LWH



1 to 124 of 124 Records



Payment History

Vendor Notes

Alternate Send To Addresses

Purchase Orders

Supplier SIC Numbers

Contracts

Letters And Emails



F3

EXHIBIT G

EXHIBIT G

Sales by Applied Images to LWHS

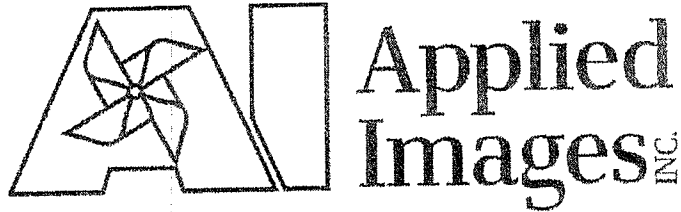
Fiscal Year (July 1 to June 30)	Uniform Fund	SIT Fund
FY 2017-2018 (January 5, 2018 – June 30, 2018)	\$2,511	\$0
FY 2018-2019	\$2,267	\$876.05
FY 2019-2020	\$1,930.76	\$722.25
FY 2020-2021	\$2,853.25	\$0
FY 2021-2022	\$1,508.25	\$140.25
FY 2022-2023	\$1,003.25	\$287.32

EXHIBIT H

EXHIBIT H

Vendor #9863

INVOICE



Applied Images, Inc.

1156 N. Scenic Hwy.
Lake Wales, FL 33853
appliedimagesinc.com
863.676.9800

Bill To: Lake Wales High School
Carol Floyd

Item Name	Attribute	Size	Orig Price	Disc %	Type	Qty	Price	Ext Price	Tax
LW Hoodie - Small	Black	S	\$28.00			6	\$28.00	\$168.00	
LW Hoodie - Medium	Black	M	\$28.00			6	\$28.00	\$168.00	
LW Hoodie - Large	Black	L	\$28.00			6	\$28.00	\$168.00	
LW Hoodie - XL	Black	XL	\$28.00			6	\$28.00	\$168.00	
							Subtotal:	\$672.00	
							Local Sales Tax	0 % Tax:	+ \$0.00
							RECEIPT TOTAL:	\$672.00	

Applying Greatness To Every Image!
Thank you for your business!!

HELD

OK TO Pay
891-9800-510-1721-33058

11/02/2022

BD

Sign:

Carol Floyd

Date:

11-2-22

[Signature]

SIT

Vendor #9863

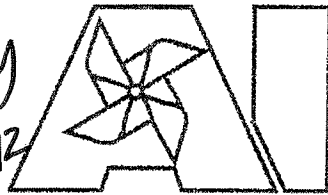
INVOICE

11/13/2022

OK to pay
891-9800-510-1721-32092

12/07/2022

\$p
\$80.00



Applied Images INC

Applied Images, Inc.

1156 N. Scenic Hwy.
Lake Wales, FL 33853
appliedimagesinc.com
863.676.9800

Bill To:

Jan Lewis SIT (SOWELL)

Item Name	Attribute	Size	Orig Price	Disc %	Type	Qty	Price	Ext Price	Tax
LW Dri Fit Jacket Mens M	Black	Medium	\$40.00			1	\$40.00	\$40.00	
LW Dri Fit Jacket Mens XL	Black	X-Large	\$40.00			1	\$40.00	\$40.00	
							Subtotal:	\$80.00	
							Local Sales Tax	0 % Tax:	+ \$0.00
							RECEIPT TOTAL:	\$80.00	

Applying Greatness To Every Image!!
Thank you for your business!!

HELD

Signed: Carol Floyd

Date: 12-5-22

Aj Sala

H2

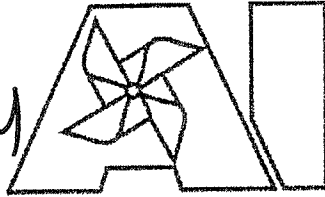
Vendor # 9803

SIT

INVOICE

1721113397

OK to pay



Applied Images INC.

891-9800-510-1721-32092

12/06/2022

Applied Images, Inc.

1156 N. Scenic Hwy.
Lake Wales, FL 33853
appliedimagesinc.com
863.676.9800

Bill To: Carol Floyd SIT

\$69.82
BD

Item Name	Attribute	Size	Orig Price	Disc %	Type	Qty	Price	Ext Price	Tax
LW Polo L500 White S	White	Small	\$21.75			1	\$21.75	\$21.75	T
LW Polo L500 Orange S	Orange	Small	\$21.75			1	\$21.75	\$21.75	T
LW Polo L500 Black S	Black	Small	\$21.75			1	\$21.75	\$21.75	T
Subtotal:								\$65.25	
Local Sales Tax							7 % Tax:	+ \$4.57	
RECEIPT TOTAL:								\$69.82	

Applying Greatness To Every Image!!
Thank you for your business!!

HELD

Sign: Carol Floyd

Date: 12-5-22

[Signature]

H3

Vendor # 9863

INVOICE



Applied Images, Inc.
1156 N. Scenic Hwy.
Lake Wales, FL 33853
appliedimagesinc.com
863.676.9800

OK TO PAY
891-9800-510-1721-32092

Bill To:
Carol Floyd SIT

\$217.50

3/08/2023
\$0

Item Name	Attribute	Size	Orig Price	Disc %	Type	Qty	Price	Ext Price	Tax
LW Polo L500 Black S	Black	Small	\$21.75			5	\$21.75	\$108.75	
LW Polo K500 Black Small	Black	S	\$21.75			5	\$21.75	\$108.75	

Subtotal: \$217.50
Local Sales Tax 0 % Tax: + \$0.00

RECEIPT TOTAL: \$217.50

Applying Greatness To Every Image!!
Thank you for your business!!

HELD

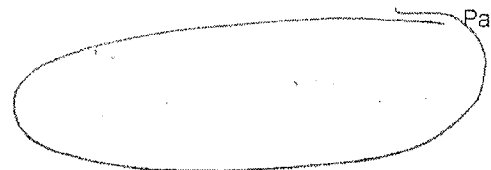
Sign: Carol Floyd

Date: 3/8/23

H4

Vendor #9863

INVOICE



OK to pay

Applied Images, Inc.
1156 N. Scenic Hwy.
Lake Wales, FL 33853
appliedimagesinc.com
863.676.9800

891-9800-510-1721-33058

\$336.00

3/08/2023

BP

Bill To: Lake Wales High School
Carol Floyd

Item Name	Attribute	Size	Orig Price	Disc %	Type	Qty	Price	Ext Price	Tax
LW Hoodie - Small	Black	S	\$28.00			3	\$28.00	\$84.00	
LW Hoodie - Medium	Black	M	\$28.00			6	\$28.00	\$168.00	
LW Hoodie - Large	Black	L	\$28.00			3	\$28.00	\$84.00	

Subtotal: \$336.00
Local Sales Tax 0 % Tax: + \$0.00

RECEIPT TOTAL: \$336.00

Applying Greatness To Every Image!!
Thank you for your business!!

HELD

Sign: Carol Floyd

Date: 3/8/23

115

Vendor
#9863

INVOICE

1721-33058



Applied Images, Inc.
1156 N. Scenic Hwy.
Lake Wales, FL 33853
appliedimagesinc.com
863.676.9800

Bill To: Lake Wales High School
Carol Floyd

Item Name	Attribute	Size	Orig Price	Disc %	Type	Qty	Price	Ext Price	Tax
Uniform LW Polo K500 Black XL	Black	XL	\$21.75			3	\$21.75	\$65.25	
							Subtotal:	\$65.25	
							Local Sales Tax	0 % Tax:	+ \$0.00
							RECEIPT TOTAL:	\$65.25	

OK to pay

Applying Greatness To Every Image!!
Thank you for your business!!

1-9800-510-1721-33058 HELD

\$65.25

3/09/2023

Sign: Carol Floyd

Date: 3/8/23

H6

EXHIBIT I

EXHIBIT I



LAKE WALES CHARTER SCHOOLS

130 E CENTRAL AVE # 3309
LAKE WALES FL 33853-4166

PURCHASE ORDER: 96117

Page: 1 of 1

***** VENDOR *****

APPLIED IMAGES, INC.
1156 N SCENIC HWY
LAKE WALES FL 33853-3249

***** DELIVER TO *****

LAKE WALES HIGH SCHOOL
1 HIGHLANDER WAY
LAKE WALES FL 33853-3334

Ordered	Due By	Ship Via	FOB	Terms	Customer No	By
07/19/2022	06/30/2023			DUE IN 30 DAYS		JRAMOS

Requisition No	Vendor No	Vendor Phone	Vendor Fax	Vendor Contact
	9863-1	(863)224-3334		

No	Quantity	U/M	Description	Unit Price	Extended	G/L Account
1	1.00	EA	SHIRTS AND HOODIES PURCHASED FOR LWHS STUDENTS 22-23	1,500.0000	1,500.00	891-9800-510-1721-33058 (Uniform Fund Acct)
2	1.00	EA	SHIRTS AND HOODIES PURCHASED FOR SIT STUDENTS AT LWHS 22-23	1,000.0000	1,000.00	891-9800-510-1721-32092 (SIT Acct)
				** TOTAL **	2,500.00	

VENDOR INSTRUCTIONS:

- MAIL INVOICES TO: LAKE WALES CHARTER SCHOOLS
130 CENTRAL AVE. E
P.O. BOX 3309
LAKE WALES, FL 33859

COPIES & PACKAGE MUST BEAR THE PURCHASE ORDER NUMBER ABOVE.
PURCHASE MAY NOT EXCEED THE TOTAL AMOUNT OF THIS ORDER WITHOUT
APPROVAL BY THE PURCHASING DEPT.
ACCEPTANCE OF THIS ORDER INCLUDES ACCEPTANCE OF ALL TERMS, PRICES,
TERMS & CONDITIONS, SPECIFICATIONS AND CONDITIONS.

- LWCS STATE TAX EXEMPT# 85-8013123274C4 EIN# 06-1667879
- IF YOU HAVE QUESTIONS, PLEASE CALL 863-679-6560

SPECIAL INSTRUCTIONS:

I 1

EXHIBIT J

EXHIBIT J



X

50% OFF!
MASKS ARE CURRENTLY
ONLY \$5!

SALE



Lake Wales High School

November 11, 2020

Masks reduced to \$5! Please buy a mask to support the class of 2021. After the cancellation of Prom (the main money generator for our class) and other fundraising opportunities, we are in need of funds for graduation in May. #seniors #takewales

11

5

Like

Comment

All comments



Peyton Chandley
They can be bought from the LWHS front office!



Julia Ryan Sorbet
Not going to the game. How do I get them?



Liz Wilson
Will these be sold at tonight's game?



Kenyiria Castro Rodriguez
Were do I get it? On school?



Toshia Bigbone Smith
Sharkajah Smith Steve Smith

See more of Lake Wales High School on Facebook

FL

EXHIBIT K

EXHIBIT K

Uniform shirts may be ordered from:

APPLIED IMAGES

DC APPAREL

RAY'S GRAPHICS

K1

EXHIBIT L

EXHIBIT L

Please call the office for information on where to order uniform shirts from.

DISTRICT UNIFORM INFORMATION

11