



Excellence and Equity in Education

Nancy Magee • County Superintendent of Schools

January 10, 2025

Las Lomas Elementary School District
1011 Altschul Avenue
Menlo Park, CA 94025
Attn: Page Winikoff, Board President

Re: Credit Card Expenditure Preliminary Review

Education Code 1241.5(b) provides the County Superintendent the authority to review expenditures and internal controls of any school district in their county if they have reason to believe that fraud, misappropriation of funds, or other illegal fiscal practices have occurred that merit examination.

San Mateo County Office of Education (SMCOE) was asked to review credit card expenditures of the Las Lomas Elementary School District (LLESD) by members of the LLESD finance subcommittee. Concerns about inappropriate use of credit cards in the district have also been reported in the local news.

SMCOE conducted our preliminary review to perform due diligence in assessing whether an Assembly Bill (AB) 139 Review is warranted. AB 139 Reviews should be conducted by Subject Matter Experts with prior experience conducting reviews and possessing appropriate knowledge of analytical procedures.

LLESD has sixteen (16) credit cards with US Bank assigned to district employees. SMCOE staff reviewed credit card expenditures of LLESD employees in 2022-23, 2023-24 and 2024-25 (through December). SMCOE reviewed the monthly credit card statement, the monthly US Bank (VISA) Card Expenditure Log Form and the supporting documentation in each month sampled. The review consisted of checking for appropriate internal control procedures such as signatures of employees and supervisors and proper supporting documentation. The review focused on internal controls and compliance with the District's Policy 3000: Expenditures and Purchases and Administrative Regulation 3350: Travel Expenses.

SMCOE does not issue an opinion as to the "appropriateness" of an expenditure in terms of either the dollar amount or the specific item purchased. Determination of "appropriateness" is a function of the Board of Trustees to be documented in policies and administrative regulations.

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Based on our due diligence review, SMCOE will hire a Subject Matter Expert in the area of school district fiscal management to conduct an Assembly Bill (AB) 139 Review. SMCOE will work with LLESB administration to coordinate the review requirements based on a specific scope of work as determined by the county office and the Subject Matter Expert.

Sincerely,



Kevin J. Bultema
Deputy Superintendent Business Services
San Mateo County Office of Education

- c. Dr. Beth Polito, Superintendent, Las Lomas Elementary School District
- Jason Morimoto, Board Member, Las Lomas Elementary School District
- Gautam Nadella, Board Member, Las Lomas Elementary School District
- Dhanya Unni, Executive Director, San Mateo County Office of Education (SMCOE)
- Nancy Magee, Superintendent, San Mateo County Office of Education (SMCOE)

