



U.S. Department of the Interior

Bureau of Indian Education

Bureau of Indian Education Administrative Investigation

**St. Stephens Indian School –
April 2022**

From: The Administration Investigative Board

Subject: Report of investigation into including sexual harassment, bullying, consumption of alcohol on school premises, and creating a toxic work environment

To: Jordan Dresser,
Chairman of the Northern Arapaho Tribe, Ethete, Wyoming

John St. Clair,
Chairman, Eastern Shoshone Tribe

**Bureau of Indian Education Administrative Investigation Report
St. Stephens Indian School**

The Business Councils for the Northern Arapaho and Eastern Shoshone Tribes, located on the Wind River Reservation met with Bureau of Indian Education (BIE) leadership and provided BIE with memorandums expressing a “Vote of No Confidence” in Frank No Runner, Superintendent of St. Stephens Indian School (Exhibit 1 – Memorandum from the Northern Arapaho Business Council and Exhibit 2 – Memorandum from the Eastern Shoshone Business Council). The Councils requested the BIE to conduct an impartial administrative investigation into the various allegations against the Superintendent of St. Stephen’s Indian School and present them with findings and recommendations.

The scope of the investigation was defined in a memorandum dated March 29, 2022 (Exhibit 3 – “Authorization to Conduct Administrative Investigation of Issues Involving St. Stephens Indian School Superintendent, Frank No Runner”).

The Business Councils also approved the Investigators: James Bartlett (BIE Personnel Security Officer), Jennifer Bauer (BIE Personnel Security Specialist), Sara Shoemate Cameron (BIE Personnel Security Specialist), and Francine Jaramillo (BIE Employee and Labor Relations Specialist), (Investigators) to conduct a thorough investigation into the facts and circumstances regarding allegations that Frank No Runner is engaging in misconduct, including sexual harassment, bullying, consumption of alcohol on school premises, and creating a toxic work environment. The memorandum also authorized the investigators to inquire into all aspects of this matter, and to gather other evidence that the investigators determine is necessary and relevant.

The Investigators were onsite at the Wind River Casino from March 29 through April 1, 2022. While there, the Investigators gathered documentation and conducted in-person interviews, which included Saint Stephens Indian School (SSIS) staff, former SSIS staff and students, and concerned parents. The team continued to gather information after

returning to their respective locations and conducted additional interviews telephonically and by web-conference.

At the beginning of each interview, the purpose of the investigation was explained and those interviewed were provided the Testimony of Rights and Obligations and were administered the oath to testify truthfully. Each person was provided a summary of their testimony and given the opportunity to review, edit, and sign their statement. In those cases where a signed statement was not returned, the unsigned statement taken from testimony provided under oath is used. The conclusions contained within the report are based on the preponderance of evidence.

Based on testimony and research, the following are “Findings of Fact”:

1. Frank No Runner is the Superintendent of St. Stephens Indian School and has held this position since July 7, 2015, (Exhibit 21, Page 1, Exhibit 31, Exhibit 59, Page 1).
2. Frank No Runner is the only individual working for St. Stephens Indian School that is not required to clock in or clock out to document time and attendance (Exhibit 20, page 2, Exhibit 58, page 1, Exhibit 74, page 1).
3. Frank No Runner and his family live in a home on St. Stephens Indian Mission property that is leased by the St. Stephens Indian School (Exhibit 1, page 1, Exhibit 11, page 3, Exhibit 31, Exhibit 44, and Exhibit 78).
4. Frank No Runner has not been required to pay any rent since living in the house leased by St. Stephens Indian School (Exhibit 21, Page 3).
5. Frank No Runner testified that he smokes marijuana, but not at work (Exhibit 21, page 13).
6. Frank No Runner was dishonest with the school board about his marijuana use and the “hotbox” incident with Witness #1 (Exhibit 13, page 1, Exhibit 21, page 12, Exhibit 53, page 1, Exhibit 79).
7. Greg Juneau is the K-8 Principal of St. Stephens Indian School and has held this position since SY18-19, (Exhibit 22, page 1, Exhibit 30, Exhibit 31).
8. On August 31, 2021, the School Board approved a contract increase in the amount of \$18,000, for Greg Juneau for “Housing benefit” per contractual obligations (Exhibit 48, page 82).
9. Greg Juneau testified that he smokes marijuana, but not at work (Exhibit 22, page 4).
10. Witness #39 (Exhibit 11, page 1, Exhibit 18, page 1, Exhibit 59, Page 1).
11. Witness #2 is Witness #39’s wife (Exhibit 11, page 1; Exhibit 59, Page 1).
12. Witness #39 and Witness #2 (Exhibit 11, page 5; Exhibit 21, Page 6; Exhibit 45, Page 3, and Exhibit 78).
13. Witness #39 and Witness #2 (Exhibit 11, page 4, Exhibit 12, page 3, Exhibit 18, Exhibit 21, page 6, Exhibit 48, page 82).
14. Witness #39 (Exhibit 48, page 82).
15. Witness #3 I (Exhibit 11, page 6, Exhibit 31)
16. On August 31, 2021, the School Board approved a contract increase in the amount of \$18,000, for Witness #3 for “Housing benefit” per contractual obligations (Exhibit 21, page 7, Exhibit 48, page 82).

17. The School Board adopted the “Saint Stephens Indian School Educational Association, Inc. Employer Provided Housing Policies and Procedures Manual” on March 20, 2020, which identified the need to provide school funded housing as a recruitment and retention tool to acquire and retain key administrative positions (Exhibit 47, page 5, Exhibit 5, Exhibit 70, page 1, Exhibit 68, page 2).
18. The “Saint Stephens Indian School Educational Association, Inc. Employer Provided Housing Policies and Procedures Manual” identifies the three houses leased from St. Stephens Indian Mission as employee quarters (Exhibit 68, page2).
19. Pattee Bement is the wife of Superintendent, Frank No Runner, and works at St. Stephens Indian School as the Food Services Supervisor (Exhibit 21, pages 7-8 and 15, Exhibit 31,).
20. Pattee Bement was reassigned to the Food Services Supervisor position, without the job being competed and with an increase in pay (Exhibit 11, pages 3 and 4, Exhibit 21, pages 7-8). There is no evidence that Pattee Bement has ever held any position that would qualify her as a Food Services Supervisor (Exhibit 21, page 7, Exhibit 22, page 5).
21. Pattee Bement lives in the home with Frank No Runner that is leased by SSIS from St. Stephens Indian Mission (Exhibit 11, Page 3, Exhibit 21, page 3).
22. Frank No Runner and Pattee Bement have two (2) children that live with them and attend St. Stevens Indian School (Exhibit 11, page 4, Exhibit 33).
23. Pattee Bement was absent 110 days in days in **SY 18-19**, 24 days included comment "insufficient benefit", and Tardy 37 days, **SY 19-20** - Absent: 66, 11/12/2019 absence - notes approved by Frank, 7 days included comment "insufficient benefit", 1 missed day of required professional development and Tardy: 32 days, **SY20-SY21** - Absent 103 days - Tardy: 9 days (Exhibit 37).
24. Frank No Runner testified he had an affair with Witness #4 (Exhibit 21, page 13, Exhibit 22, page 3)
25. Pattee Bement has a restraining order against her for harassing Witness #4 at her place of work (Exhibit 38, Exhibit 22, page 3).
26. Pattee Bement communicated with Witness #4 via Facebook and tried to get Witness #4 to have sex with her husband, Frank No Runner (Exhibit 38).
27. Frank No Runner testified that on his 40th birthday he asked Witness #39 to pick him up a twelve pack of beer on his way home from work and Witness #39 brought the beer to him (Exhibit 11, page 3, Exhibit 18, page 5, Exhibit 42).
28. Witness #5 (former St. Stephens student) was at Mr. No Runner’s house when Witness #39 delivered the beer (Exhibit 11, page 3, Exhibit 18, page 5).
29. Witness #6 (Exhibit 23, page 1; Exhibit 59, Page 1).
30. Witness #6 left employment with St. Stephens Indian School primarily due to unprofessional behavior by Greg Juneau and Frank No Runner (Exhibit 23, Pages 1-3, Exhibit 56).
31. Witness #7 (Exhibit 16, page 1; Exhibit 59, Page 1).
32. Witness #1 (Exhibit 11, page 4, Exhibit 13, page 1; Exhibit 59, Page 1).
33. Witness #8 (Exhibit 12, Page 1, Exhibit 16, Page 1; Exhibit 31, Exhibit 59, Page 1).
34. Witness #9 (Exhibit 12, page 1, Exhibit 14, pages 1 and 2, Exhibit 31).

35. Witness #1 and Witness #7 (Exhibit 11, page 5, Exhibit 13, page 1 and 2, Exhibit 16, page 2, Exhibit 20, page 1, Exhibit 39 Power Point Presentation).
36. Witness #7 (Exhibit 16, page 2).
37. Financial Consultants were hired to review the school finances and help get financial records in order (Exhibit 16, pages 1-3, Exhibit 20, page 1, Exhibit 21, pages 2-3, 15)
38. Witness #10 (Exhibit 11, page 6, Exhibit 20, pages 1-2, 4, Exhibit 21, page 3).
39. Witness #10 (Exhibit 20, page 2).
40. Witness #10 (Exhibit 20, page 1, Exhibit 21, page 4).
41. Witness #8 and Witness #9 (Exhibit 21, page 4, Exhibit 40, and Exhibit 41).
42. Witness #8 and Witness #9 (Exhibit 12, page 1), Exhibit 14, page 1, Exhibit 20, page 4, Exhibit 21, pages 4-5).
43. Witness #8 and Witness #9 (Exhibit 20, page 4).
44. Witness #11, Frank No-Runner and Witness #10 said Witness #8 and Witness #9 (Exhibit 19, page 2, Exhibit 20, page 4, Exhibit 21, page 4).
45. Witness #8 and Witness #9 (Exhibit 12, page 3 and Exhibit 78).
46. Witness #12, requested the School Board to allow her to live in the house where Witness #8 and Witness #9 lived (Exhibit 48, page 71).
47. The School Board approved Witness #12's request to live in the house for \$400 per month rent on August 31, 2021 (Exhibit 48, page 82).
48. Witness #8 and Witness #9 continue to live with Witness #12 (Exhibit 12, page 2).
49. Witness #12 is currently paying \$400.00 per month rent (Exhibit 11, page 6; Exhibit 48, Page 82; Exhibit 60, Page 2).
50. Alcohol is consumed at Frank No Runner's home located on the school grounds which is leased by St. Stephens Indian School (Exhibit 11, page 2, Exhibit 12, page 3, Exhibit 14, page 2, Exhibit 18, page 5, Exhibit 21, page 15 Exhibit 23, page 2, Exhibit 42, Exhibit 51, page 8, Exhibit 78).

Definitions:

Sexual Harassment - behavior characterized by the making of unwelcome and inappropriate sexual remarks or physical advances in a workplace or other professional or social situation.

Toxic Work Environment - A toxic work environment is one where employees find it difficult to work or progress in their careers due to the negative atmosphere created by coworkers, supervisors, or the company culture itself.

Workplace Bullying - Workplace bullying refers to repeated, unreasonable actions of individuals ... Workplace bullying often involves an abuse or misuse of power.

Bullying is usually seen as acts or verbal comments that could psychologically or 'mentally' hurt or isolate a person in the workplace.

Allegations, Analysis, and Conclusions:

Allegation 1 – Frank No Runner is engaging or has engaged in misconduct of a sexual nature that is unbecoming of a St. Stephens Indian School superintendent.

Analysis – Sexual harassment is defined as behavior characterized by the making of unwelcome and inappropriate sexual remarks or physical advances in a workplace or other professional or social situation.

Testimony revealed one former school employee (Witness #6) was subjected to sexual harassment and inappropriate behaviors that pushed the bounds of the professional relationship (Exhibit 23, page 1). She testified she specifically left employment with St. Stephens Indian School because of the unprofessional behavior of Frank No Runner and Greg Juneau (Exhibit 23, page 1-2). She testified they (No Runner and Juneau) repeatedly attempted to show her and her boyfriend (Witness #35) nude pictures of girls, made inappropriate sexual innuendoes directed at her and asked her to come to their house(s) at inappropriate times during the night. Witness #6 believed their behavior stepped over the bounds of being a colleague (Exhibit 23, Page 1). She testified that both she and her boyfriend Witness #35, who also works at the school, told No Runner and Juneau to stop the inappropriate behavior on several occasions (Exhibit 23, Page 1, Exhibit 56). Witness #6 claims she wrote on her resignation letter and on her application for new employment that her reason for leaving St. Stephens Indian School was due to unprofessional and inappropriate behavior by school leadership (Exhibit 23, Page 2). Witness #6 alleges her new employer called for a reference and informed Juneau of her reasons for leaving St. Stevens (Exhibit 23, page 2). She claims Juneau later came to her new place of employment intoxicated and asked her why she wrote on her application to the school that she left employment due to inappropriate behavior of leadership (Exhibit 23, page 2). Per Witness #6, Juneau had to be asked to leave her work location (Exhibit 23, Page 2).

Witness #13 testified that No Runner asked her to come to St. Stephens to assist with presenting some classes on restorative practices in 2017 and another occasion with setting up a youth conference in March 2018. In May 2021, he said he wanted her to fill a position at the school, but he had to clear it with the School Board first (Exhibit 5, Page 1).

No Runner started calling, texting, and harassing her to the point she had to inform him that he had to stop (Exhibit 5, page 1-3). No Runner repeatedly made inappropriate and unwanted sexual advances toward her and said he just wanted to be with her for one night to show her how much he loved her (Exhibit 5, page 2). On one occasion, No Runner picked her up from her hotel before school and asked her if she wanted to go to his house first for breakfast, she reported he made the comment in a tone that could have been perceived as creepy and found it as inappropriate (Exhibit 5, Page 1). When the behavior continued, she contacted his wife (Pattee Bement) in hopes the harassment would end. She insinuated that after informing him and his wife that his advances were unwelcome, he no longer mentioned the position previously discussed. Witness #13 testified that she believed No Runner did not want her to fill the position in a professional capacity, but only to be his girlfriend (Exhibit 5, Page 1). Witness #14 a former St. Stephens student refused to testify but provided a signed written statement (Exhibit 27). Witness #14 wrote that in 2017 she and her friend arrived at No Runner's house to pick up Witness #5 (Exhibit 27, Page 1). Witness #14 recounted the story to Witness #15, who stated, Witness #14 went into No Runner's

house and found that Witness #5 was on a coffee table intoxicated and dancing topless (Exhibit 27, page 6, Exhibit 28, Page 1). Witness #14 wrote that she witnessed Frank No Runner, Matthew Mortimore, Greg Juneau, Pattee Bement, Macey Mortimore, and LittleRaven Oldman and other adults encouraging Witness #5 to do more (Exhibit 27, Page 3). She alleges Witness #39, and Frank No Runner were causing her problems also but did not elaborate (Exhibit 27, page 1). Witness #14 wrote that No Runner was giving female students money for inappropriate acts (Exhibit 27, Page 2).

No Runner testified he had an affair with Witness #4. She was of age and a willing participant in the affair (Exhibit 21, page 13). Witness #4 did not corroborate the affair. The Investigators learned No Runner's current wife (girlfriend at the time of the affair), Pattee Bement, began corresponding with Witness #4 via social media as early as December 8, 2020 (Exhibit 38). On one such social media message, Bement asked Witness #4 if she still wanted Frank and if she wanted to meet him at the Holiday Inn, "Because he's game" (Exhibit 38). When Witness #4 failed to respond, Bement wrote, "It takes two to tango right". Then, Bement wrote, "Honey do you still want to get fucked" (Exhibit 38). It is unclear if Bement was harassing Witness #4 on this occasion, or if she was soliciting sex for No Runner. In March 2021, Witness #4 did take out a restraining order (Exhibit 44) against Bement for harassing her at her place of employment. In or about October 2021 the relationship between No Runner and Witness #4 ended (Exhibit 21, Page 14). Witness #4's boyfriend contacted and/or pursued No Runner on several occasions and attempted to engage him in physical altercations (Exhibit 21, Page 14).

Witness #15 also testified that a young lady by the name of Witness #17 was a student at St. Stephens Indian School and that Frank No Runner asked her to babysit occasionally. On one occasion, he allegedly asked her to have sex with him for money. Per Witness #15, Witness #17 got her things and abruptly left the house. He said he would try to get her to talk to the Investigators (Exhibit 28, Page 2). Throughout the investigation multiple witnesses testified they had heard rumors of No Runner soliciting underage girls for nude photographs and sex. One name came up repeatedly (Witness #5), former student of SSIS, but Witness #5 would not cooperate with the investigation. Of significance, when Witness #5 was about 20 years old, she was seen by Witness #39 at No Runner's house and appeared to be highly intoxicated (Exhibit 11, page 3, Exhibit 18, page 5, Exhibit 42). Witness #39 was bringing No Runner some beer when he witnessed Witness #5 at the house (Exhibit 11, page 3, Exhibit 18, page 5, Exhibit 42). When questioned by the Investigators, No Runner claimed Witness #5 was of age, they flirted, he has asked her for pictures but denied paying for them and said nothing happened as she had a lot going on and was upset or words to that effect (Exhibit 21, page 14). No Runner stated he had sent Witness #5 \$100 during the regional basketball tournament that year, but it was not for pictures (Exhibit 21, page 14). However, testimony revealed that a couple days after Witness #5 was at his house No Runner bragged to Witness #39 while playing golf that he had the best 40th birthday ever and said he had sex with Witness #5 (Exhibit 51, page 8).

Witness #15 testified that a former student of his, Witness #14, was distraught and traumatized, and had considered committing suicide after going to No Runner's house with a friend in 2017 to pick up a mutual friend who was allegedly 17 years old (Witness

#5) (Exhibit 28, page 1). He said she confided in him after he talked her into dropping the knife and talking to her about the things that were bothering her emotionally (Exhibit 28, page 1). He testified that after hearing Witness #14's concerns, he raised the issue with the state "PTSB", and they did not investigate the matter (Exhibit 28, Page 4). He stated that he could not go to the School Board with issues because he would be fired because they are corrupt, and they do anything No Runner wants them to do (Exhibit 28, page 2-4). Witness #15 was scared for his job (Exhibit 28, Page 3).

The Investigators believe Witness #5 was at No Runners house on his 40th birthday based on his confirmation she was there, and the fact Witness #39 saw her there. The Investigators also find it probable that No Runner had sex with Witness #5 on the day of his birthday and believe he informed Witness #39 he had the best 40th birthday ever. Although inappropriate, the Investigators believe Witness #5 was of legal age to engage in a sexual relationship with No Runner because she was approximately 20 years old. The Investigators find this event important because it demonstrates a nexus to the testimony and statements provided by Witness #15 and Witness #14. Specifically, the written statement provided by Witness #14 in which she wrote that in 2017 she was a student of SSIS, and she and a friend went to No Runner's house to pick up a mutual friend (Witness #5) who was also a current student at SSIS. She wrote that upon her arrival Witness #5 was on the coffee table at No Runner's house and witnessed Witness #5 dancing topless and being encouraged by the adults in the room (Exhibit 28, Page 1). Per Witness #14, Witness #5 was intoxicated (Exhibit 27, page 1). Although there is no evidence of anyone having sex at this party, the fact the Superintendent of the school, the principals of the school and other adults in leadership roles found it acceptable to have a student at this party, allowed her to dance on a table topless and consume alcohol, is unacceptable. The Investigators believe Witness #14 had nothing to gain by providing her statement with the recollection of what she witnessed. In addition, based on Witness #15's testimony, the event was so traumatic for Witness #14 that it contributed to her deteriorated emotional state, and she was considering suicide (Exhibit 28, Page 1). Other names of students that allegedly received sexual advances by No Runner include, Witness #17, former babysitter of No Runner, and Witness #18 (Exhibit 28, page 2). The Investigators believe the preponderance of evidence and testimony support that No Runner more likely than not had or attempted to have sexual relationships with students of SSIS.

Witness #9 testified No Runner would send inappropriate messages to ex-students, ones that had been away for a couple of years. One girl told Witness #9 that No Runner sent her a message stating he would give her \$400.00 to bring her and her friends to party. Witness #9 stated that quite a few girls told her this. Witness #9 stated one girl (Witness #5) really needed the money and she would go to his house for the money and stay for a bit and leave. Witness #9 also said Witness #19, some girls from Wyoming Indian school, and Witness #20's sister told her that No Runner would send her messages to come hang out (Exhibit 14, page 2).

The Investigators find the testimony of Witness #6 credible as it pertains to No Runner and Juneau attempting to show her and her boyfriend nude pictures of girls/women,

making inappropriate sexual innuendos and calling her at inappropriate times of the night asking her to come to their homes. The Investigators believe Witness #6 asked both Juneau and No Runner to stop the inappropriate and unprofessional conduct, and they did not (Exhibit 23, page 1-2, Exhibit 56).

The Investigators find the testimony of Witness #13 credible and believes No Runner informed Witness #13 he wanted her to fill a position at the SSIS, but he had to clear it with the School Board first. The Investigators also believe No Runner started calling, texting, and harassing her to the point she had to inform him that he had to stop. The Investigators also believe No Runner repeatedly made inappropriate and unwanted sexual advances toward her and said he just wanted to be with her for one night to show her how much he loved her. The Investigators also believe Witness #13 asked No Runner to stop sending her inappropriate texts and to stop calling her. After the unwanted advances/behavior continued Witness #13 contacted No Runner's wife (Pattee Bement) in hopes the harassment would end. Witness #13 insinuated that after informing his wife that his advances were unwelcome, No Runner no longer mentioned the SSIS position previously discussed. Witness #13 testified she believed No Runner did not want her to fill the position in a professional capacity, but only to be his girlfriend (Exhibit 5, Page 1).

Conclusion – Frank No Runner is engaging or has engaged in misconduct of a sexual nature that is unbecoming of a St. Stephens Indian School superintendent and his actions may have harmed Indian children. In some instances, his behavior is considered sexual harassment.

Allegation 2 – Frank No Runner is engaging or has engaged in conduct that is considered as bullying type behavior toward students, parents, or staff of St. Stephens Indian School.

Analysis – Workplace Bullying - Workplace bullying refers to repeated, unreasonable actions of individuals ... Workplace bullying often involves an abuse or misuse of power.

Bullying is usually seen as acts or verbal comments that could psychologically or 'mentally' hurt or isolate a person in the workplace.

Witness #2 and Witness #39 testified that there were occasions when Frank No Runner was upset with them that he told them he would fire them. On one such occasion No Runner had made a recommendation to the School Board to have both fired (Exhibit 11, page 7, Exhibit 18 page 1). By the next Board meeting, No Runner had changed his mind and requested the School Board to approve a pay raise for both Witness #2 and Witness #39 (Exhibit 11, page 7, Exhibit 48, page 67). When questioned, No Runner testified they talked their issues out and resolved their differences (Exhibit 21, page 9). Although this could be cited as an example of working together, Witness #2 and Witness #39 felt intimidated by No Runner's actions. The Investigators believe this is a bullying tactic used by No Runner and evidences an abuse of power.

Witness #39 testified that he complained to No Runner about Pattee Bement, No Runner's wife, not showing up for work on a regular and recurring basis and told him

her absences were having a negative impact on the school (Exhibit 18, page 4). Witness #39 testified that No Runner said to him in a humorous way, “Mmmm Yeah, but you can’t fire my wife” (Exhibit 18, page 4). On another occasion when Bement missed a professional development day, No Runner told Witness #39 via text message he was not allowed to dock Bement’s pay for missing work, even though they did that for everyone else who had missed on that occurrence (Exhibit 51, page 7). No Runner did not allow Witness #39 to address Bement’s attendance but did eventually reassign her. The Investigator’s find No Runner’s action to be another example of bullying because No Runner inappropriately used his authority to intervene on his wife’s behalf and caused frustration with the supervisor.

Witness #21 testified that No Runner called her after learning of derogatory “Facebook” posts by parents of St. Stephens Indian School and members of the community. He informed Witness #21 in writing on a text, “I am very fucking pissed off” (Exhibit 4, page 1). Witness #21 stated she had no control over members of the community or over mothers or parents that are upset with his decisions regarding the reopening of the school. Witness #21 said No Runner informed her that “This is my school and whatever I say goes!” Witness #21 testified she felt that No Runner was inappropriate and was intimidating. The Investigators believe No Runner as superintendent of SSSS should never speak to parents of the SSSS children in such an inappropriate manner because they did not like his decisions.

Witness #6 testified No Runner never bullied her while she worked for SSSS. However, in review of her testimony she said Greg Juneau came to her new place of employment and appeared to be intoxicated (Exhibit 23 page 2). Her place of employment was a bar, and the bartender threw him out. He had to be asked by the bartender to leave because of his inappropriate behavior. The Investigators believe the actions by Juneau in this situation were intimidating and would be considered bullying and or harassment.

Witness #15 testified that he feels bullied by staff at SSSS and that the bullying is due to derogatory comments about him to others by No Runner and Witness #39 (Exhibit 28, Pages 1 - 4). One recent example was when he was walking down the hall at the school and encountered a peer [REDACTED]. Witness #26 started saying, “Christy Putnam, Christy Putnam, Christy Putnam!” referring to Witness #15’s daughter’s new basketball coach. Witness #15 thought it was odd that Witness #26 would be referring to his daughter’s coach since his daughter no longer attended SSSS. Also, Witness #15 sent an email (Exhibit 50) to the Investigators stating he was recently bullied by Witness #27. [REDACTED]

[REDACTED] Witness #15 also stated that Witness #27 is Witness #39’s go to person and that Witness #27 plays this monopoly game with No Runner and Witness #39 to pick on people they did not like (Exhibit 50). Witness #27 provided a statement denying Witness #15’s allegations (Exhibit 61, page 1).

No Runner and Juneau were engaging in inappropriate communication on Facebook (Exhibit 51, pages 10-14). In one instance, Juneau posted:

“...Saddam Hussein...Osama Bin Laden... Donald Trump...Witness #39 Haha”
The same series of Facebook posts contained many other inappropriate comments and innuendoes about women.

Witness #39 provided testimony via email (Exhibit 57) that although he blew it off, he was offended by the post and “didn’t appreciate being compared to a dictator/terrorist.” (Exhibit 57, Page 1). The Investigators considered this post to be a type of bullying because No Runner did not intervene and tell Juneau such posts were inappropriate. Further, No Runner’s failure to address this type of unacceptable behavior directed at one of his subordinates by a SSIS peer likely indicates No Runner is complicit and condones such behavior.

Witness #2 testified that on one occasion No Runner was talking harshly and inappropriately at her and yelled, “If you don’t want to do it, I will find someone else to do your job”. She said she broke down and cried because she only asked to be compensated for all the additional duties No Runner was assigning her. When she tried to speak, he kept shutting her down and continued to be loud. Witness #39 finally stepped in and told No Runner, “Let her talk.” Witness #2 described No Runner conduct as demeaning and said he made her feel as if she was not important. Witness #2 testified that more generally speaking No Runner is negative and demeaning to women, talks down to them, and when he is rude, it is typically with women. She said she has to prove her worth to him more than her male counterparts (Exhibit 11, Page 6). Witness #39 reiterated Witness #2’s version of the incident (Exhibit 18, Page 6). In addition, Witness #39 provided an email after his testimony (Exhibit 52) stating he thought bullying and intimidation was an issue. He said he didn’t think he could report the unprofessional behavior with anyone for fear of getting fired. Witness #23 testified that on numerous occasions No Runner presented false or misleading information to the School Board when discussing potential termination actions. Witness #23 stated No Runner would look directly at her while he was discussing these matters with the School Board. She believes he did this because he knew she knew he was telling lies and he was trying to intimidate her. Witness #23 also stated that a few years ago No Runner pulled multiple people into a meeting and stated he wanted to discuss the fact that he heard things were being said about him in the community. She took the meeting as a threat because No Runner told the group that if someone says something about him, he (No Runner) will go after that person (Exhibit 7, Page 2).

Conclusion - Frank No Runner is engaging or has engaged in conduct that is considered as bullying type behavior toward parents, staff, and former staff of St. Stephens Indian School. As previously stated in the analysis, bullying refers to repeated, unreasonable actions of individuals and often involves an abuse or misuse of power. Bullying is usually seen as acts or verbal comments that could psychologically or 'mentally' hurt or isolate a person in the workplace. Mr. No Runners behavior is consistent with the definition, either by his own acts or by allowing inappropriate acts of others to continue.

Allegation 3 – Frank No Runner is engaging or has engaged in the consumption of alcohol on school premises or at school related functions, trainings, etc.

Analysis – Frank No Runner and his family live on St. Stephens Mission property that is leased and maintained by St. Stephens Indian School per his employment contract (Exhibit 29, page 1-2). Per the contract, it is clear that the three homes and property leased by SSIS is considered part of the school premises because it states, “As a condition of his/her employment with the district, **shall be required to reside in housing provided by the district on school grounds** at least (4) days per week and take part in school activities where so scheduled and oversee the school grounds and buildings during the time that school is in session. Per the Catholic Priest who also resides on the mission property, the church has nothing to do with the houses leased by St. Stephens. Per testimony of Witness #24, any properties leased by the St. Stephens Indian school is considered school grounds (Exhibit 25, page 2). No Runner admitted in his testimony that he drinks at his home which is leased by SSIS but does not believe his home is considered part of the school premises (Exhibit 21, page 3). No Runner testified he does not drink alcohol during the workday when required to be at work or at school events. He also testified that on one occasion he asked Witness #39 to bring him a twelve pack at his home on the mission property because it was his 40th birthday (Exhibit 42, page 2). Witness #39 testified he brought No Runner the beer per his request (Exhibit 18, page 5). This is the same time that Witness #39 saw Witness #5 at No Runners home and she appeared to be intoxicated (Exhibit 42, Page 1).

Witness #2 testified she had witnessed individuals drinking at No Runners home which is located on the mission property and leased from the mission by St. Stephens Indian school (Exhibit 11, page 2).

Witness #8 testified No Runner always had cookouts and alcohol was involved (Exhibit 12, page 3). Witness #6 testified that she and Witness #35 stopped by No Runner’s house on the way to an alumni basketball game, and they all were drinking. She testified No Runner and Greg Juneau were drunk and showed up and played the game that way. She further testified that at the basketball game people were saying they could smell alcohol on their breath (Exhibit 23, page 2).

Witness #1 testified she was on travel to a school funded conference (No Kids Hungry conference) with No Runner and his wife Pattee Bement. While on this school funded travel, No Runner rented a vehicle for their travel. Witness #1 testified that No Runner was drinking and driving the vehicle with her and his wife as a passenger and smoking marijuana (Exhibit 13, page 1). No Runner testified he was driving and one point but let his wife take over. He did not dispute the drinking while in the vehicle and stated he engaged in personal things on personal time after his conference duties were done (Exhibit 21, pages 11-12). Of significance, he did not deny smoking marijuana on this trip.

Conclusion – The investigators concluded Frank No Runner is engaging and has engaged in the consumption of alcohol on school premises or at school related

functions, trainings, etc. and potentially endangered the safety of a SSIS employee while on travel.

Allegation 4 – Frank No Runner is creating a toxic work environment at St. Stephens Indian School

Analysis – Witness #2 testified that she does not believe the work environment is toxic. She believes most people like working at SSIS. Most problems are generated by No Runner and Juneau (Exhibit 11, page 7). Witness #39 testified overall the work environment is not toxic. He said the only period he could characterize as toxic was when Witness #7 worked for SSIS, and he and Witness #2 were on the chopping block for supporting Mr. Witness #7 (Exhibit 18, page 1). In addition, Witness #39 provided an email after his testimony (Exhibit 52) stating he thought bullying and intimidation was an issue. Witness #7 testified he felt like No Runner was a “Mob Boss” and that is the environment he was working in. Witness #23 testified she felt like SSIS had a toxic work environment and said people fear for their jobs due to No Runner, Greg Juneau, and Matthew Mortimore. Witness #23 also testified that they intimidate staff, raise their voice, tell you your job is on the line if they disagree with you (Exhibit 7, page 4). Witness #1 testified she didn’t feel comfortable handling the finances and the work environment was toxic (Exhibit 13, page 1). Also, in her resignation letter she states, “Also Frank, Pattee, and I attended a No Kid Hungry training. My problem I had during this training was one of the nights we went down-town and Frank purchased Marijuana.” No Runner joked about her being worried about the employee drug test. Witness #1 said she sat quietly in the back seat and then he “hot boxed” the car with her in it, because he didn’t want people outside to smell it (Exhibit 53, page 1). She further stated she was really upset because she felt as if she was forced to inhale the second-hand marijuana smoke (Exhibit 13, page 1, Exhibit 53, page 1). Witness #1 further stated in her resignation letter that she felt as if she were retaliated against and doesn’t have the mental capacity to deal with the leadership of SSIS. She wrote she didn’t feel welcome at the school and felt as if she had been targeted (Exhibit 53, Page 3). Witness #30 testified she felt as if she was bullied by Juneau. She said she believes teachers at the school are threatened by the administration and the morale is down (Exhibit 10, page 1-2). Witness #15 testified he felt like SSIS has a toxic work environment because they have their own little group, and everyone just tries to come to work. He is also aware of them bullying the science teacher, social studies teacher, and Witness #30. He testified he saw Witness #30 crying last week due to the bullying (Exhibit 28, pages 1-3).

The definition of a toxic work environment is one where employees find it difficult to work or progress in their careers due to the negative atmosphere created by coworkers, supervisors, or the company culture itself. Based on this definition and the testimony of those interviewed, the Investigators believe Frank No Runner creates or facilitates a toxic work environment.

Conclusion - Frank No Runner is engaging or has engaged in misconduct that has contributed to a toxic work environment at St. Stephens Indian School.

Additional allegations not specifically identified in the scope of the investigation:

Allegation 5 – Frank No Runner is engaging in the use of marijuana on a regular recurring basis, both on and off school premises.

Analysis – Frank No Runner testified he smokes marijuana. When asked if he smoked marijuana on the school sponsored trip to New Orleans with Pattee Bement and Witness #1, he responded by saying “I did do personal things on my own personal time after my conference duties were done. He further testified he didn’t believe what he had done traumatized Witness #1 (Exhibit 21, page 12).

Witness #1 testified No Runner smoked marijuana in the car during the trip to New Orleans and “hot boxed” her in the car. She testified that Bement was also smoking marijuana (Exhibit 13, page 1). Per the “Your Dictionary” website, the definition of “Hot Box” means an airtight room or vehicle that contains one or more pot smokers smoking marijuana (Exhibit 55). Witness #1 in her resignation letter she states, “Also Frank, Pattee, and I attended a No Kid Hungry training. My problem I had during this training was one of the nights we went downtown, and Frank purchased Marijuana.” Frank joked about her being worried about the employee drug test. She said she sat quietly in the back seat and then he “hot boxed” the car with her in it, because he didn’t want people outside to smell it. She further stated she was really upset because she felt as if she was forced to inhale the second-hand marijuana smoke (Exhibit 13, page 1, Exhibit 53).

Greg Juneau was asked if he smokes marijuana. He testified “I smoke marijuana when it is legal, and it is available. It is a coping mechanism for my stress. I do not smoke heavily or habitually. But if it is there, I will take it. I don’t think this would set a good example for the kids, but I do it on my own time. I am familiar with the federal drug free workplace program for schools receiving federal funds. I understand that marijuana is not in compliance with schools receiving federal funds” (Exhibit 22, page 4).

Witness #2 testified she lives next door to No Runner, and she is aware of parties at his house. On one occasion she went to No Runner’s house and saw a lot of weed and alcohol in the house. She stated there were definitely people there that were underage, and she saw students drinking alcohol and smoking marijuana. She said the students were not from SSIS. She testified she saw Greg Juneau at this same party smoking weed, but did not see Frank smoking (Exhibit 11, page 2). Witness #2 has seen Frank smoke marijuana on the golf course as recently as this past summer (Exhibit 51, page 9). On one occasion when she was pregnant No Runner blew marijuana smoke in her face (Exhibit 11, page 2).

Witness #39 testified that No Runner and Juneau smoke weed. Witness #39 stated, “There aren’t too many people that don’t know that.” He further stated that No Runner smokes weed on the golf course. Witness #39 said that he mentioned this to a School Board member, but nobody seems to care (Exhibit 18, page 5).

Witness #9 testified that she saw Frank smoke weed a couple of times at his house parties. At the last house-party she went to at No Runner's house, Witness #9 said she remembers Juneau discussing with others doing cocaine because he personally asked her if she wanted to do some. She declined because she only went to No Runner's to play poker. She saw Juneau dip some on his fingers and put it on his gums. After seeing this she went home. Witness #9 said she saw No Runner smoking weed and there were ex-students that were not old enough to drink. Witness #9 said she asked them why they were there, and they said they were invited by an employee. One was the younger brother of an employee's husband. There was another employee who was going to be 21 in a couple of weeks and this employee was drinking. Witness #9 stated that anytime Juneau is drinking he is always inappropriate, and she tries to steer clear of him (Exhibit 14, page 2).

Witness #6 testified Frank had lots of parties and many employees would be there drinking. Frank No Runner and Pattee Bement's children were there. There was weed in the house and Pattee was smoking it. They were talking about how they got the weed from Vegas. Witness #6 testified that her boyfriend, Witness #35, told her Frank confided in him and said he smoked some weed with some boys outside the gym (Exhibit 23, page 2).

The Investigators believe No Runner's admission and the significant amount of testimony supports that No Runner is smoking marijuana on school leased premises and off school premises. The investigators also believe the preponderance of the evidence supports that school employees and members of the community are also smoking marijuana at No Runner's house. It is inconclusive as to whether minors are smoking marijuana at No Runner's house, but the investigators believe minors have been present when the school leadership and staff are smoking marijuana at No Runner's house. Of significance, No Runner and Bement's children have been present and they are students of SSIS.

Conclusion - Frank No Runner is engaging in the use of marijuana on a regular recurring basis, both on and off school premises and having parties, cook outs, or social gatherings at his house, where SSIS school employees have participated in the drug use.

Allegation 6 – Frank No Runner is using his position or has used his position for personal gain.

Analysis – Frank No Runner testified that he reassigned his wife Pattee Bement to the Food Services Director position which consists of a .9 position and other duties connected to the McKinney Vinto Grant makes up the other .1 of her position. He testified she was reassigned from the SSIS Culture Arts and Food teacher and was getting paid as a long-term sub making approximately \$40,000.00 per year. After her non-competitive reassignment, she now makes \$50,000.00 for the Food Service Director position and an additional \$5000.00 for the McKinney Vinto program (Exhibit 21, page 8). Witness #1 testified she received a \$13,000.00 for performing the Food Service Director responsibilities and performed this function as a collateral duty (Exhibit

13, page 1). Witness #8 testified that she once performed the duties of the Food Service Director and was paid a stipend for the collateral duty. Witness #1 took over the Food Service Director responsibilities and was paid a stipend of about \$13,000.00 for performing this collateral duty (Exhibit 12, page 3). Witness #2 testified that Witness #1 was the previous Food Service supervisor, and she was paid a \$13,000.00 stipend. Witness #39 testified he complained to Mr. No Runner that his wife Pattee Bement was missing so many days from school that students were complaining. Witness #39 said Mr. No Runner informed him, "You are not going to fire my wife." And then she was transitioned into her current position.

The Investigators determined based on the preponderance of the evidence that the Food Service Director position had always been a collateral duty with a stipend of \$13,000.00 being paid to the employee being assigned this responsibility. After Witness #1 resigned and Witness #39 went to Mr. No Runner about complaints from students about his wife's regular absenteeism, Mr. No Runner reassigned his wife, non-competitively, as a .9 Food Services Director, increasing her salary from \$40,000.00 per year to \$50,000.00 per year and an additional \$5000.00 for assisting with the McKinney Vinto Program. Bottom line is she received a \$15,000.00 raise by actions taken by Mr. No Runner. As such, he misused his position as the school superintendent, because he noncompetitively reassigned his wife, Pattee Bement, into a position that has a salary increase of \$15,000.00. By virtue of him being married to Ms. Bement he recognized a personal gain because he and his family did recognize this benefit. In addition, he as superintendent, illegally gave his wife a \$37,000.00 raise over others that had previously performed the same responsibility as a collateral duty (Exhibit 21, page 8) (Exhibit 54). The Investigators believe the evidence supports Mr. No Runner took actions that resulted in a personal gain for him and his family and is an example of the type of behavior that violates the nepotism policy as described in the Tribal Education Code, 8 N.A.C.101 et seq. (Exhibit 62, page 31).

Conclusion - Frank No Runner is using his position or has used his position for personal gain.

Allegation 7 – Frank No Runner has inappropriately used his position and school funds to influence subordinate staff at St. Stephens Indian School.

Analysis – Witness #2 testified that SSIS employee Witness #8 used to live in a home owned by her husband Witness #39 (Exhibit 11, page 4). Frank No Runner approached the Witness #39 and Witness #2 and said Witness #8 could not afford her rent and asked them to lower it from \$1200.00 per month to \$900.00 per month. Mr. No Runner told Witness #39 and Witness #2 that if they lowered Witness #8's rent, he would give them a raise (Exhibit 11, page 4). Both Witness #8 and Frank No Runner confirmed this information in their testimony (Exhibit 12, page 3, Exhibit 21, page 6). Witness #8 stated, "I rented from Witness #39 for about 3-years, and I paid him \$1200.00. When I asked to move into the 2nd (mission) house, me, Frank, and Witness #39 had a meeting. The meeting got heated, as Witness #39 wanted to live in the house on the mission. My rent was dropped to \$900.00 during the meeting after myself and Frank negotiated with Witness #39" (Exhibit 12, page 2). Frank No Runner

confirmed this information and testified, “Yes, I know Witness #8 was at one point renting a home from Witness #39 and Witness #2. I approved a raise for the Witness #39 and Witness #2 for them to reduce Witness #8’s rent (Exhibit 21, page 6). Witness #24 testified it would not be an appropriate use of government funds if Mr. No Runner gave an employee a raise in exchange for lowering rent on the business tech’s house (Exhibit 25, page 3).

Based on the evidence and testimony of all parties involved, the Investigators determined Mr. No Runner inappropriately used his position and influence to have a subordinate employee change the rent for another employee, using school funds as a mechanism to pay off Witness #39 and Witness #2 for reducing Witness #8’s rent.

Conclusion- Frank No Runner inappropriately used his position and school funds to influence subordinate staff at St. Stephens Indian School.

Allegation 8 – Frank No Runner was compromised because he did not report inappropriate expenditures of school funds by a member(s) of the School Board.

Analysis – Around 2017, a car repair was authorized by the School Board for Witness #31. Witness #10 testified that when she began working at SSIS, Witness #31 was making payments on it, but the amount had not yet been paid in full (Exhibit 20, Page 2). Frank No Runner testified that this incident occurred during his third year being a superintendent at SSIS. He stated that Witness #31 was on school travel when he broke down, which is why the board discussed the matter. Mr. No Runner stated, “I did not necessarily take it as a threat it was concerning cause I have a family and just relocated here.” (Exhibit 21, Page 6). Witness #7 testified that when he began working at SSIS Mr. No Runner told him he was threatened by Witness #31 that if he didn’t authorize the car repair he would get fired. Witness #7 further stated that he believed No Runner became compromised at that point because No Runner “knew there was an illegal transaction on the books, and he should have said this is not okay, and how should they fix this” (Exhibit 16, Page 2).

No Runner testified he voiced a concern that he felt the expenditure was inappropriate, but since he was a brand-new superintendent and being new to the BIE education system, he hadn’t heard of OIG or other avenues to be able to report an inappropriate expenditure. However, No Runner admitted he was in his third year at the school and testified he had previously been employed at Northern Cheyenne Tribal Schools (Exhibit 21, Pages 1 and 11). Northern Cheyenne Tribal Schools, like SSIS, is a Tribally Controlled School which receives grant funding from BIE.

The Investigators determined based on a preponderance of the evidence that No Runner was aware a personal car repair for the School Board member was inappropriately authorized by the School Board. By his own admission, No Runner had at least two years of experience at SSIS, as well as his time at Northern Cheyenne Tribal Schools. One could reasonably expect a Superintendent with that amount of experience to identify both an inappropriate expenditure of school funds, as well as the appropriate avenue to report or rectify an inappropriate expenditure. The Investigators

believe he chose not to elevate the issue to higher level authorities because of fear of losing his job. By not reporting this inappropriate expenditure of school funds, No Runner allowed himself to become compromised in his position as Superintendent, as well as complicit in allowing school funds to be used inappropriately. The fact that when No Runner discussed the issue with Witness #31, that Witness #31 threatened to go talk to Witness #32 was concerning (Exhibit 21, page 6). The investigators believe No Runner's testimony that he felt his job would have been compromised had he reported the issue to higher level authorities, because the School Board has the authority to effect terminations. The Investigators found no evidence that there was a pattern of this type behavior by the School Board. However, it is clear the School Board approved the illegal expenditure, which had not been paid in full until the past year (Exhibit 20, page 2). As such, the School Board is culpable. The Investigators believe No Runner himself became compromised when he demonstrated he would not report inappropriate or illegal activities by the School Board.

Conclusion - Frank No Runner was compromised because he did not report inappropriate expenditures of school funds by a member(s) of the School Board.

Allegation 9 – Frank No Runner inappropriately used the school credit card for inappropriate personal expenses.

Analysis – Frank No Runner testified he made personal charges on his school credit card in 2018-2019 but that he stopped that practice in August of 2019 when OIG came in (Exhibit 21, page 2). No Runner testified he paid everything back and since that time he has only had four personal charges which were mistakes on hotel reservations (Exhibit 21, page 2). He further testified that due to Witness #7's claims, Witness #10 went through his entire credit card transactions, and it was zeroed out (Exhibit 2, page 3). No Runner testified that in SY 20-21 there was only one incident and he communicated that to the School Board (Exhibit 21, page 3).

Witness #10 testified that when she got to St. Stephens, they had replaced the entire business office staff (Exhibit 20, page 1). She testified that when she started reviewing the credit card purchases, she started with Witness #8 and Witness #9 first because they were on administrative leave (Exhibit 20, page 4). She testified she confirmed there were some misuses with personal expenditures by Witness #8 and Witness #9 that were inappropriate (Exhibit 20, page 1). Witness #10 said she created a spreadsheet and went through and requested documentation or required repayment if expenditures could not be justified (Exhibit 20, page 1). She further stated she had intended to go through No Runner's school credit card expenditures but had not done this yet because it is time consuming to match up his credit card to his per diem checks (Exhibit 20, page 2). Witness #10 testified she just recently started on his as it is on her to-do list, and she planned on doing this as soon as possible now that they have more staff (Exhibit 20, Page 4).

The Investigators determined Frank No Runner was not forthcoming when he testified that Witness #10 had audited his credit card transactions and they were "zeroed out", because his testimony directly contradicts hers and she provided an email and

spreadsheet showing the only work she had completed on No Runner (Exhibit 20, page 2, Exhibit 63). The Investigators also find the delay in conducting a review of No Runner's transactions to determine the extent of unallowed and questionable expenses, whether they were repaid or not, unreasonable. The delay gives the appearance that there was a priority on investigating lower-level employees in an effort to resolve Witness #7's complaints of inappropriate expenditures. According to Witness #10, No Runner also has an education repayment debt he has owed SSIS prior to her arrival in February 2021, that remains unpaid as of the date of her testimony (Exhibit 20, page 4). It is unclear if this was paid if the class(es) were paid by his school credit card or not. Of significance, others at the school are reimbursed after the classes are taken and demonstration that required grades were obtained. It appears No Runner is treated differently and that his classes are paid in advance (Exhibit 20, page 4).

Witness #10's initial spreadsheet regarding No Runner's expenditures for June 2019 through June 2020 show personal expenditures by No Runner that must be repaid (Exhibit 63). However, the way Witness #10 documented the spreadsheet is in such a manner that inappropriate expenses could easily be hidden. Witness #9 provided a spreadsheet she was maintaining for the period of July 2015 to September 2020 and is documented in detail of exactly what his personal charges entailed and what he owed the school, including short term loans from the school (Exhibit 64).

After review of all the testimony and exhibits the Investigators believe the preponderance of the evidence supports that Mr. No Runner has and is inappropriately using the school credit card for personal expenses. This is evidenced by both Witness #9 and Witness #10's spreadsheets and testimony.

Conclusion – Frank No Runner inappropriately used the school credit card for inappropriate personal expenses and appears to still be using the school credit card for inappropriate expenditures.

Other Findings from the Investigation Pertaining to Greg Juneau, School Elementary Principal, St. Stephens Indian School:

Allegation 10 - Greg Juneau is engaging in the use of marijuana on a regular recurring basis, both on and off school premises.

Analysis – Greg Juneau was asked if he smokes marijuana. He testified, "I smoke marijuana when it is legal, and it is available. It is a coping mechanism for my stress. I do not smoke heavily or habitually. But if it is there, I will take it. I don't think this would set a good example for the kids, but I do it on my own time. I am familiar with the federal drug free workplace program for schools receiving federal funds. I understand that marijuana is not in compliance with schools receiving federal funds". Juneau states he last used marijuana on spring break (March 2022), (Exhibit 22, page 4). Witness #2 testified she is aware of parties at No Runner's house. On one occasion she went to No Runner's house and there was a lot of weed and alcohol in the house. Witness #2 testified there were definitely people there that were underage,

and she said she saw students drinking alcohol and smoking marijuana. She said the students were not from SSIS and said, "I saw Greg Juneau at this same party smoking weed, but did not see Frank smoking (Exhibit 11, page 2). Witness #39 testified that No Runner and Juneau smoke weed. He said, there aren't too many people that don't know that. Witness #39 said he mentioned this to a School Board member, but nobody seems to care (Exhibit 18, page 5). Witness #9 testified at Frank's last house party she went to, she said she remembers Juneau discussing doing cocaine, with others. She said he personally asked her if she wanted to do some. Witness #9 said she declined because she only went to No Runner's house to play poker. She saw Juneau dip some on his fingers and put it on his gums. After seeing this she went home. Witness #9 stated that anytime Mr. Juneau is drinking he is always inappropriate, and she tries to steer clear of him (Exhibit 14, page 2). Witness #6 testified Frank had lots of parties and many employees would be there drinking.

Several employees provided testimony that Mr. Juneau appears to be under the influence of marijuana while at school. Witness #2 testified she has occasionally suspected Juneau comes to work under the influence, stating, "I have seen Greg drunk and high on the golf course, so I know how it looks when he is drunk and high. I have seen him at school exhibiting these same behaviors, his speech is different, his eyes look different. I see Greg look like this around once a week. He will come back from lunch and will look a little funny or sometimes will leave for lunch and won't come back (Exhibit 11, page 4). Witness #9 testified that while talking to Mr. Juneau at school, "I was able to smell the weed on him. She said she would tell him about it and he would say, 'What, you can smell it on me?' There were a few times when he would come back from lunch where he looked high, and you could smell it on him" (Exhibit 14 page 3). Pictures were provided by Witness #2 showing Greg Juneau and Frank smoking marijuana in a pipe while playing golf. She testified that Witness #16 brought the marijuana to No Runner and Juneau while on the golf course (Exhibit 11, page 3, Exhibit 51, page 9).

The Investigators believe Mr. Juneau's admission, the significant amount of testimony, and the preponderance of the evidence supports that Mr. Juneau is smoking marijuana on a regular recurring basis and has smoked marijuana on school grounds.

Conclusion – Greg Juneau is engaging in the use of marijuana on a regular recurring basis, both on and off school premises and where other SSIS school employees have participated in the drug use.

Allegation 11 – The SSIS School Board inappropriately authorized Greg Juneau and Witness #3 an \$18,000 stipend to be used to pay housing expenses using government funds. Note: This request and approval occurred, knowing the SSIS never had an approved "Needs Assessment" completed (Exhibit 81).

Analysis – The SSIS engaged in a 10-year lease agreement with the St. Stephens Mission, to lease three (3) houses and associated property that was in ill repair from them in exchange for the SSIS to fix, remodel, and upgrade the homes (Exhibit 11, page 5). The leased property is somewhat adjacent to the SSIS. The purpose of the

lease was originally as an incentive for the superintendent, the elementary school principal and the High school principal and required a \$400.00 per month rent (Exhibit 71, page 2). In or about the second year of the lease, Frank No Runner requested the Board allow the Superintendent and the two principals to live in the houses rent free. The Board approved the recommendation. This is evidenced in No Runner's current contract, to include free housing as part of their contracts, (Exhibit 29, page 1, Exhibit 68, page 3). No Runner (SSIS Superintendent) and his family occupies one of the homes. Witness #39 and his family occupies one of the homes. The remaining home was occupied by the former SSIS Elementary School Principal. No Runner requested on Witness #8's behalf that she be authorized a monthly stipend of \$1200.00 to pay her rent. The Board approved the request for \$1200.00 per month. After the former elementary school principal left SSIS, Witness #8 asked if she could live at the vacant mission school property house that was then vacant. No Runner advised her the house was reserved for the new Elementary School principal. When Juneau was hired as the elementary school principal, he opted to not live in the house (Exhibit 21, page 7). At this point, No Runner requested Board approval for Witness #8 to be allowed to live in the home rent free. The Board approved the request (Exhibit 12, page 3). This was done without giving most others at SSIS the opportunity. This approval resulted in an approximate \$14,400.00 pay increase for Witness #8. The Investigators determined that if the stipend for Juneau was \$14,400.00 for rent or home purchase per year, then a reasonable person would believe the value of the rent-free mission home must be equal to the amount of the stipend paid to Mr. Juneau. At some point a determination was made that individuals receiving stipends for housing were required to pay taxes on the stipends. No Runner then went back to the Board and requested the stipends be increased from \$1200.00 per month to \$1500.00 per month to cover the taxes (Exhibit 48, page 25, Exhibit 73, pages 2-3).

Of significance all these stipends were renamed "payroll stipends" and No Runner informed the staff that these stipends were reserved for anyone in administrative positions. Witness #2 asked No Runner if she could have a payroll stipend since she held an administrative position. He informed her she couldn't since her husband already received the benefit of a mission home (Exhibit 76, page 2). The Investigators find the lackadaisical expenditure of stipends without a formal policy concerning and inappropriate. Although there is no written formal policy pertaining to paying housing stipends for select individuals, outside of the reason for the mission lease agreement, Witness #3 was also approved a stipend of \$18,000.00 to pay for housing (Exhibit 48, Page 82). The Investigators also found where an \$18,000.00 per year stipend was also going to be requested for Witness #10 (Exhibit 69, Exhibit 76, page 1). When questioned, Witness #10 said she declined the \$18,000.00 stipend because she did not feel that her receiving the stipend would be an appropriate use of school funds (Exhibit 60, page 2). Witness #10 stated she also didn't take the stipend because she could see where it would get out of hand, and everyone would want it. Witness #10 said the stipends or housing could be used as a recruitment tool and could be appropriate in certain situations such as for recruiting (Exhibit 60, page 2).

Witness #24 testified "Because the school does receive funding for staff quarters the staff is required to pay a certain amount of rent. If a staff member does not live-in staff

quarters, then they should not receive a supplement for their rent (Exhibit 25, page 3, Exhibit 70).

Based on the evidence as described in the School Board meeting notes and the OIG report dated March 2021 (Exhibit 81), it confirmed that many of the SSIS Staff receive inappropriate payments for housing dating back to 2015. Throughout 2019, SSIS officials contacted the BIA and BIE for their "Employer Provided Housing Program". BIE officials provided SSIS officials with a Housing policy for SSIS to follow but were unable to provide SSIS with a needs assessment (Exhibit 80, page 2). From July 2016 through June 2018 SSIS spent \$4767.00 of BIE funds for utilities and maintenance without approval from BIA and BIE. The OIG questioned the use of these funds as these were ineligible costs (Exhibit 81, page 5). In December 2019, the board approved to pay rent and retro back rent from July 1, 2019, for Witness #3 (Exhibit 46, page 74). In March 2020, the board approved to pay rent for Witness #3 and Juneau covering April, May, and June, totaling \$1800.00 per employee (Exhibit 47 page 5). In June 2021, the board approved Witness #3 and Juneau to each receive a \$4500 stipend for housing (Exhibit 48, page 20), and Witness #3 and Juneau, received retroactive to July 1, 2021, a \$18,000 stipend (each) for housing via amended contracts for employee provided housing. (Exhibit 48, Page 25). Per the OIG report, it appears the SSIS were aware of the "Needs Assessment" requirement for employee housing as early as 2015 and that before housing was provided, the needs Assessment must have been reviewed and approved by the BIA. SSIS alleges they provided the assessment in 2015 but could not provide evidence the Needs Assessment was provided, and BIA could not provide evidence the Needs Assessment was ever submitted (Exhibit 81, page 4). The Investigators determined that the SSIS inappropriately provided housing without the required approval.

Per Circular-A-45R, "Determination of rents. Agencies of the Federal Government must adhere to the following in determining rental rates for Government rental housing: 1. Reasonable value to employee. Rental rates and charges for Government housing and related amenities will be based upon their "reasonable value ... to the employee ... in the circumstances under which the quarters and facilities are provided, occupied or made available." 5 U.S.C. section 5911. 2. Subsidies, inducements prohibited. Federal employees whose pay and allowances are fixed by statute or regulation may not receive additional pay and allowances for any service or duty unless specifically authorized by law. 5 U.S.C. section 5536. Consequently, rents and other charges may not be set so as to provide a housing subsidy, serve as an inducement in the recruitment or retention of employees, or encourage occupancy of existing Government housing. Subsidies to living expenses are prohibited as an additional benefit not accorded to government employees living in the private market. 3. Justifiability, consistency. When properly determined in accordance with the provisions of this circular, rental rates will be justified and consistent, and will provide a reasonable value to the employee under the circumstances under which the housing is provided." See <https://www.whitehouse.gov/wp-content/uploads/2019/11/Circular-A-45R.pdf> The Investigators believe No Runner's requests to the School Board for back rent and stipends were inappropriate and that the School Board's decision to approve the inappropriate/illegal housing expenditures violates numerous regulations (Exhibit 25,

page 3, Exhibit 70, and Exhibit 72). Had the School Board exercised due diligence and made the SSIS leadership provide justification and research demonstrating the expenditures were legal, they could have been better informed prior to making these decisions.

Conclusion - The SSIS School Board inappropriately authorized Greg Juneau, Witness #3, and Witness #8 stipends ranging from \$14,400.00 to \$18,000.00 per year using money from Federal government funds. In addition, housing for other employees has been provided, rent free, even though SSIS was aware the Needs Assessment review and approval process was never finalized with the BIA or BIE.

Allegation 12 - Pattee Bement smokes marijuana on SFIS premises and during off-site trips associated with school activities.

Analysis - Frank No Runner testified he smokes marijuana. When asked if he smoked marijuana on the school sponsored trip to New Orleans with Pattee Bement and Witness #1, he responded by saying "I did do personal things on my own personal time after my conference duties were done" (Exhibit 21, Page 12). Witness #1 testified No Runner smoked marijuana in the car while they were in New Orleans and "hot boxed" her in the car (Exhibit 13, page 1). She testified Bement was also smoking marijuana. Witness #6 testified No Runner had lots of parties and many employees would be there drinking, No Runner and Bement's children were there, there was weed in the house and Bement was smoking it. They were talking about how they got the weed from Vegas (Exhibit 23, page 1).

The Investigators believe Bement smokes marijuana in her home located on SSIS leased property and while on school sponsored activities, conferences, etc. Of significance, No Runner and Bement's children have been present at their home located on SSIS premises when No Runner and Bement have parties that include drinking alcohol and smoking marijuana (Exhibit 23, page 1, Exhibit 11, page 3). Furthermore, their children are SSIS students.

Conclusion - Pattee Bement smokes marijuana on SFIS premises and in the presence of students of SSIS children.

Allegation 13 – Frank No Runner, his wife Pattee Bement, and their children are held to a lower standard than other SSIS employees and students as it pertains to attendance.

Analysis – The school employee Handbook (Exhibit 34, page 24-27), although vague, and individual contracts spell out employee time and attendance.

The SY 18-19 attendance records for Bement (Exhibit 37) indicate she was absent 110 days with 24 days including a comment of "insufficient benefit", and she was tardy 37 times.

The SY 19-20 attendance records for Bement (Exhibit 37) indicate she was absent 66 days with 7 days including a comment of "insufficient benefit", and one note stating 11/12/2019 absence - notes approved by Frank and she was tardy 32 times. Timecard notes also documented 1 missed day of required professional development.

The SY 20-21 attendance records for Bement (Exhibit 37) indicate she was absent 103 days. Did not count Mar-June days marked as Statewide Covid closures and she was tardy 9 times.

Witness #10 testified she trusts Bement reports her time accurately but said she hasn't monitored and can't confirm that her time and attendance is accurate. She said she needs to do a better job and she didn't know what the time and attendance policy is. She said she doesn't know when Bement is there and when she is not. When advised of how much time Bement has missed over the past three years she sounded surprised (Exhibit 20, page 3).

Witness #39 testified that when he brought Bement's poor attendance to No Runner, No Runner informed him he could not fire his wife (Exhibit 18, page 4). Witness #39 stated that employees that have severe attendance issues are typically placed on a plan of improvement, and eventually removed if the attendance issues continue. Witness #39 said he felt as if he took any action against Bement for fear of retaliation by No Runner. Witness #39 also testified Juneau missed a lot of time also, but it usually wasn't counted against him because he was hanging out with No Runner. Witness #10 stated she felt as if she couldn't say anything to No Runner. She further testified that Bement is required to clock in and out but doesn't clock in very often (Exhibit 74, page 2). Witness #39 also testified that on one occasion when Pattee was absent that No Runner specifically told him he was not docking her pay (Exhibit 51, page 7).

No Runner was questioned about his requirement to clock in for work and to clock out from work. No Runner avoided the direct question, but stated he is an exempt full-time employee, and this issue has already been looked at by the Office of Investigator General (OIG). The SSIS policies are vague and do not require anyone to clock in or out (Exhibit 75, page 58). However, it is an unwritten policy that all employees check in and out. Per Witness #2, No Runner does not take time keeping seriously (Exhibit 11, page 4). In fact, No Runner has informed Witness #10 that the School Board authorized him to not clock in and out. However, this cannot be found in the School Board minutes and there is no evidence he is not required to clock in and out (Exhibit 20, page 2). Witness #39 testified that No Runner has always said he would never clock in and out because it's ridiculous (Exhibit 18, page 2).

Mr. No Runner and Ms. Bement's children are excessively absent from school or tardy (Exhibit 33). In fact, the following shows their school attendance records:

2021-2022 school year

4th grader – excused 2, unexcused 35

6th grader – excused 15, unexcused 27

2020-2021 school year

3rd grader – excused 3, 65 unexcused

5th grader – excused 3, unexcused 34

2019-2020 school year

2nd grader – 8 excused and 25 unexcused

4th grader – 31 unexcused

The investigators found based on the documentation we received it appears Bement was absent from work for a total of approximately 279 days and tardy for approximately 78 days over a three-year period (Exhibit 37). The Investigators contend there is no plausible way an average person or supervisor would consider her absenteeism and tardiness acceptable and not excessive. Since she was a teacher or a para, her absences had to have a negative impact on Indian children. Per Witness #39, Bement was not placed on a plan of improvement by her supervisors because of fear of retaliation by No Runner. In fact, No Runner told Witness #39 that he was not going to fire his wife. The Investigators find that No Runner inappropriately influenced Bement's supervisor to not hold her accountable to the same standards as other employees of SSIS. The Investigators also find No Runners and Bement's children were out an excessive amount of time that violates the requirements of the student handbook (Exhibit 33 and Exhibit 34). The preponderance of the evidence revealed that Bement is not held to the same standard as other employees as it pertains to time and attendance and when her poor attendance is brought to No Runners attention, he will not support holding her accountable. In addition, the Investigators found that No Runner and Bement's children are in fact treated differently than other students and are not held to the same standard as required by the student attendance policy. The total absences are egregious and could potentially be considered child abuse per regulation. Of significance, SSIS has a 4-day school week, which when considering the number of absences, is even more alarming.

Conclusion - Frank No Runner's wife Patee Bement is held to a lower standard than other SSIS employees as it pertains to employee attendance as No Runner would not let her previous supervisor hold her accountable or address her attendance issues. No Runner is not held to the same standard as all other employees of the school as he does not clock in and out. In addition, No Runner and Bement's children are also held to a lower standard as they are not required to comply with the student handbook pertaining to student attendance requirements.

Allegation 14 - Employees requiring state certification are not dismissed when the certification expires.

Analysis – All educators are required to maintain state certification appropriate to their assigned positions (Exhibit 54, page 29, Exhibit 77, page 1-2). The School Board may terminate professional staff contracts for failure to obtain and maintain the appropriate certification for the assigned position (Exhibit 43, page 1).

Greg Juneau has not been certified since December 14, 2020 (Exhibit 65, page 1) and does not have a current valid license yet has been authorized to perform his job duties. Juneau did not submit an application for re-certification until September 3, 2021, and the state of Wyoming Professional Teaching Standards Board (PTSB) reported Juneau has been very difficult to work with and non-responsive (Exhibit 67, page 1). His application was cancelled by PTSB on December 21, 2021, for failure to submit fingerprints (Exhibit 67, page 1). His application was re-opened January 1, 2022, after fingerprints were received, however PTSB reports they are still pending his required personal statement (Exhibit 67, page 1). PTSB has contacted Juneau multiple times for his statement and if not received by May 4th, 2022, his application will be cancelled and will not be re-opened again (Exhibit 67, page 1).

In addition, Frank No Runner's certification expired February 15, 2022. In October 2021, he submitted an Add Endorsement application (Exhibit 67, page 2). At that time, PTSB contacted No Runner to ask him about submitting a reinstatement application (Exhibit 67, page 2). Since PTSB did not hear back from No Runner, they only proceeded with the Add Endorsement (Exhibit 67, page 2). For reinstatement, No Runner will need to submit a reinstatement application, fingerprint cards, a fee of \$300, and official transcripts, or provide certificates of completion for professional development that he's completed to show he has the 5 credits necessary for renewal (Exhibit 67, page 2). No Runner has not submitted a reinstatement application (Exhibit 67, page 2).

Other employees of SSIS are not certified but no action has been taken by SSIS leadership to terminate their employment. A listing of K-8 and High School Teacher Certifications for SY-21-22 lists Witness #34, Witness #35, Witness #36, Witness #37, and Witness #16 do not meet state certification requirements. These documents were certified by Principal Greg Juneau and Principal Matthew Mortimore demonstrating SSIS awareness of the issue (Exhibit 65 and 66).

The state of Wyoming was provided a verification of certification report on January 18, 2022, attesting to employment certification and showing those individuals who are not currently certified.

The Investigators contend the individuals cited in this analysis are required by regulation to maintain the certification as a condition of employment. As such without the certification, these individuals must not be authorized to function in the roles for which they were hired. In addition, they should be required to pay back any funds earned for the period which they were not certified.

Conclusion - Employees requiring state certification are not dismissed/terminated when the certification expires.

Recommendations:

Recommendation 1 – The BIE Investigators recommend the Business Council(s) retrocede the SSIS back to BIE. This recommendation is based on all the conclusions

stated above in the administrative investigation report which identifies so many issues with SSIS leadership and the SSIS School Board that it is improbable that the necessary changes will be made without BIE oversight. At such time the Council(s) determine appropriate improvements have been made, they can request to reassume SSIS control.

Recommendation 2 – The Investigators recommend that at a minimum all SSIS leadership including Frank No Runner, Greg Juneau, Matthew Mortimore and Pattee Bement be removed, and others assessed for removal based on information contained in this report.

Recommendation 3 – The Investigators recommend the School Board be removed from their roles due to their complicit participation in approving inappropriate and potentially illegal expenditures and dereliction of duty.

Recommendation 4 – The Investigators believe the Business Council should make it a point to be more involved with the SSIS and provide oversight of the School Board and have access to School Board minutes and agendas.

Recommendation 5 - The Investigators recommend all persons involved in SSIS leadership and with the SSIS School Board be required to become thoroughly familiar with all school policies and pertinent tribal, state and federal regulations.

Recommendation 6 – The Investigators recommend all requests for the expenditure of funds by SSIS leadership be supported by regulations to validate the expenditure of funds are legal and in accordance with regulation and provided to the School Board so they can make well informed decisions.

Recommendation 7 – The Investigators recommend it be a policy of SSIS that when an employee or administrator allows their state licensure to expire that the employee or administrator be immediately terminated for failure to meet a condition of employment and not paid for any services rendered from the date the license expired.

Recommendation 8 – The Investigators recommend that anyone who misuses the School credit card be provided a written warning on the first offense, be disciplined on the second offense and terminated on the third offense.

Recommendation 9 – The Investigators recommend a well written employee and student time and attendance policy be established that discusses the consequences for being absent without leave or for repeat unexcused absences/excessive absences, etc. The current policy is subjective and doesn't explain what excessive or abuse means.

Recommendation 10 – The Investigators recommend a process for elevating serious issues involving the superintendent and or School Board regarding allegations of fraud, waste, abuse, or mismanagement, without fear of retaliation.

Sara Shoemate Cameron
BIE Personnel Security Specialist
Administrative Investigation Board (AIB) Member

Jennifer Bauer
BIE Personnel Security Specialist
AIB Team Member

Francine Jarmillo
BIE Employee/Labor Relations Specialist
AIB Member

James L. Bartlett
BIE Personnel Security Officer
AIB Chair

Exhibit List:

Testimony of Witness #21, Concerned Parent of SSIS children (Exhibit 4)
Testimony of Witness #13 (Exhibit 5)
Testimony of Witness #29, Concerned Parent of SSIS children (Exhibit 6)
Testimony of Witness #23, (Exhibit 7)
Testimony of Witness #4, former student of SSIS, and later paramour of Frank No Runner (Exhibit 8)
Testimony of Witness #22, Concerned parent of SSIS children (Exhibit 9)
Testimony of Witness #30 (Exhibit 10)
Testimony of Witness #2 (Exhibit 11)
Testimony of Witness #8 (Exhibit 12)
Testimony of Witness #1 (Exhibit 13)
Testimony of Witness #9 (Exhibit 14)
Testimony of Witness #16 (Exhibit 15)
Testimony of Witness #7 (Exhibit 16)
Testimony of Witness #25 (Exhibit 17)
Testimony of Witness #39 (Exhibit 18)
Testimony of Witness #11 (Exhibit 19)
Testimony of Witness #10 (Exhibit 20)
Testimony of Frank No Runner – Superintendent, SSIS (Exhibit 21)
Testimony of Greg Juneau – SSIS Elementary School Principal, (Exhibit 22)
Testimony of Witness #6 (Exhibit 23)
Testimony of Witness #33 (Exhibit 24)
Testimony of Witness #24 (Exhibit 25)
Letter/Statement from Witness #38 (Exhibit 26)
Testimony of Witness #14 (Exhibit 27)
Testimony of Witness #15 (Exhibit 28)
Current contract for Frank No Runner – (Exhibit 29)
Current Contract for Greg Juneau – (Exhibit 30)
SSIS SY19-20 Position Org Chart (Exhibit 31)
Reserved, Placeholder (Exhibit 32)
School Time and Attendance for No Runner Children (Exhibit 33)
SSIS Student Handbook (Exhibit 34)
Wyoming State Law regarding student truancy – (Exhibit 35)

Employee Time and Attendance Policy – (Exhibit 36)
Pattee Bement Time-Cards (Exhibit 37)
Pattee Bement Facebook exchange with Witness #4 (Exhibit 38)
Power Point (Exhibit 39)
Witness #8 email statement (Exhibit 40)
Witness #9 email (Exhibit 41)
Frank No Runner email (Exhibit 42)
Policy GCB Contracts and Professional Comprehension plan (Exhibit 43)
Restraining Order by Witness #4 against Pattee Bement (Exhibit 44)
SSIS 2018 School Board Minutes (Exhibit 45)
SSIS 2019 School Board Minutes (Exhibit 46)
SSIS 2020 School Board Minutes (Exhibit 47)
SSIS 2021 School Board Minutes (Exhibit 48)
SSIS 2022 School Board Minutes (Exhibit 49)
Witness #15 Email (Exhibit 50)
Administrator Issues Document (Exhibit 51)
Email from Witness #39 (Exhibit 52)
Witness #1 Resignation Letter (Exhibit 53)
Educational Code of the Northern Arapaho Tribe (Exhibit 54)
HotBox Meaning “Your Dictionary” (Exhibit 55)
Email from Witness #35 (Exhibit 56)
Email from Witness #39 (Exhibit 57)
Email from Frank No Runner – Clocking In/Out (Exhibit 58)
Email from Witness #23 (Exhibit 59)
Email from Witness #10 (Exhibit 60)
Email from Witness #27 (Exhibit 61)
Tribal Education Code, 8 N.A.C. 101 et seq. (Exhibit 62)
Frank No Runner’s Credit Card Spreadsheet (SY19-20) from Witness #10 (Exhibit 63)
Frank No Runner’s Credit Card Spreadsheet from Witness #9 (Exhibit 64)
K-8 Teacher Certification Document SY-21-22 (Exhibit 65)
High School Teacher Certification Document SY-21-22 (Exhibit 66)
Email from State of Wyoming PTSB RE GJ and FNR (Exhibit 67)
St. Stephens Housing Policy (Exhibit 68)
School Board Agenda 8/17/2021 (Exhibit 69)
OMB Circular A-45- revised – Rental and Construction of Government Housing -
(Exhibit 70)
School Board Meeting Minutes from February 24, 2015 (Exhibit 71)
Email from Witness #24 (Exhibit 72)
Housing Issues document (Exhibit 73)
Email from Witness #10 (Exhibit 74)
SSIS Board Policies, Section G: Personnel (Exhibit 75)
Email from Witness #2 (Exhibit 76)
Email from Beth Lougee about Wyoming statutes (Exhibit 77)
Pictures of Houses leased by SSIS (Exhibit 78)
Frank No Runner response statement (Exhibit 79)
SSIS OIG Report Discussion re Housing (Exhibit 80)

OIG Report Final Report The St. Stephen's Indian School Educational Association, Inc.,
Needs To Improve Financial Accountability for Federal Funds Report No. 2019-FIN-08
(Exhibit 81)