

No. 24-394 and 24-396

---

IN THE  
**Supreme Court of the United States**

---

OKLAHOMA STATEWIDE CHARTER SCHOOL BOARD, et al.,  
and  
ST. ISIDORE OF SEVILLE CATHOLIC VIRTUAL SCHOOL,  
*Petitioners,*

v.

GENTNER DRUMMOND, Attorney General for the State of  
Oklahoma, ex rel. STATE OF OKLAHOMA,  
*Respondent.*

---

**JOINT APPENDIX**  
**(Volume 2 of 2)**

---

JAMES A. CAMPBELL  
ALLIANCE DEFENDING  
FREEDOM  
44180 Riverside Pkwy  
Lansdowne, VA 20176  
(571) 707-4655  
jcampbell@ADFlegal.org

*Counsel for Oklahoma  
Statewide Charter School Board*

MICHAEL H. MCGINLEY  
DECHERT LLP  
1900 K Street, NW  
Washington, DC 20006  
(202) 261-3378  
michael.mcginley@dechert.com

*Counsel for St. Isidore of Seville  
Catholic Virtual School*

GREGORY G. GARRE  
LATHAM & WATKINS LLP  
555 Eleventh Street, NW  
Suite 1000  
Washington, DC 20004  
(202) 637-2200  
gregory.garre@lw.com

*Counsel for Respondent*  
(additional counsel listed  
on inside cover)

---

*Petition for Writ of Certiorari filed October 7, 2024*  
*Certiorari Granted January 24, 2025*

GENTNER F. DRUMMOND  
*Attorney General of Oklahoma*  
GARRY M. GASKINS, II  
*Solicitor General*  
OFFICE OF THE OKLAHOMA  
ATTORNEY GENERAL  
313 NE 21st Street  
Oklahoma City, OK 73105  
(405) 521-3921  
garry.gaskins@oag.ok.gov  
*Counsel for Respondent*

**TABLE OF CONTENTS**

**VOLUME 1**

U.S. Constitution  
Amendment I..... 1

Petitioner’s Application to Assume Original  
Jurisdiction and Petition for Writ of Mandamus and  
Declaratory Judgment  
Supreme Court of Oklahoma  
Case No. 121694  
Filed October 20, 2023 ..... 2

St. Isidore of Seville Catholic Virtual School  
Virtual Charter Application Excerpts from  
Section 7: Organizational Capacity ..... 13

St. Isidore of Seville Catholic Virtual School  
Virtual Charter Application Excerpts from  
Section 9: Education Program and Performance.... 19

St. Isidore of Seville Catholic Virtual School  
Virtual Charter Application  
Section 13: Appendix D: Enrollment Chart ..... 28

St. Isidore of Seville Catholic Virtual School  
Virtual Charter Application  
Section 13: Appendix F: Section 2:  
Statements of Assurances..... 31

St. Isidore of Seville Catholic Virtual School  
Virtual Charter Application  
Section 13: Appendix F: Section 3:  
Conflict of Interest Policy Forms..... 41

St. Isidore of Seville Catholic Virtual School  
Virtual Charter Application Excerpts from  
Section 13: Appendix I: Archdiocese of Oklahoma  
City Letter of Support..... 56

St. Isidore of Seville Catholic Virtual School  
Virtual Charter Application Excerpts from  
Section 13: Appendix J:  
OCCSAA/OPSAC Accreditation ..... 57

Oklahoma State Department of Education  
Accreditation Compliance Review Sheet ..... 58

**VOLUME 2**

St. Isidore of Seville Catholic Virtual School  
Virtual Charter Application Excerpts from  
Section 13: Appendix H:  
Funding Formula Support ..... 88

St. Isidore of Seville Catholic Virtual School  
Virtual Charter Application  
Section 13: Appendix H:  
Start-Up and 5 Year Budget ..... 93

St. Isidore of Seville Catholic Virtual School  
Virtual Charter Application  
Section 13: Appendix H:  
Start-Up and Year 1 Budget and Cash Flow ..... 98

**St. Isidore of Seville Catholic Virtual School  
Virtual Charter Application Excerpts from  
Section 13: Appendix H: Funding Formula Support**

First Half of Year 1						
Category (Grade Levels)	Student FTE	Program Costs Factors	Weighted Student ADM	Base Student Allocation	Adjustment Factor?	Base Funding
K - Full Day	15.0	1.330	20.0	\$1,971.90	1.000	\$39,339.41
1-2	40.0	1.330	53.2	\$1,971.90	1.000	\$104,905.08
3	30.0	1.330	39.9	\$1,971.90	1.000	\$78,678.81
4-6	115.0	1.330	153.0	\$1,971.90	1.000	\$301,602.11
7-12	300.0	1.330	399.0	\$1,971.90	1.000	\$786,788.10
Economically Disadvantaged	0.0	1.330	0.0	\$1,971.90	1.000	\$0.00
ELL (Bilingual)	0.0	1.330	0.0	\$1,971.90	1.000	\$0.00
Gifted	0.0	1.330	0.0	\$1,971.90	1.000	\$0.00
SPED - Specific Learning Disability	0.0	1.330	0.0	\$1,971.90	1.000	\$0.00
SPED - Other Health Impairment	0.0	1.330	0.0	\$1,971.90	1.000	\$0.00
Weighted Salary Incentive Aid	0.0	0.000	665.0	\$93.83	20.000	\$1,247,939.00
	0.0	0.000	0.0	0	1.000	\$0.00
Year 1 Cash pre-Q1 count True-up						\$2,559,252.50











# St. Isidore of Seville Catholic Virtual School

## Appendix H: Start-Up and 5 Year Budget

St. Isidore of Seville Catholic Virtual School - Base Budget							
Funding - Enrollment Revenue	Start-up	FY 2024	FY 2025	FY 2026	FY 2027	FY 2028	Assumptions
<b>Total Enrollment</b>							
FTE		425	425	800	1000	1200	Assumes 87% funded ADA Assumes 20% SPED population
State		25,923,300	2,688,057.01	5,689,222.16	\$688,197.35	\$825,041.08	
		\$0	\$0	\$0	\$0	\$0	First OAC Fees are highlighted in blue
Total State		\$25,923,300	\$2,688,057.01	\$5,689,222.16	\$6,881,976.35	\$8,255,041.08	
Acad School Funding		\$0	\$0	\$0	\$0	\$0	
Total Local		\$0	\$0	\$0	\$0	\$0	
Total Revenue/Funding		\$25,923,300	\$2,688,057.01	\$5,689,222.16	\$6,881,976.35	\$8,255,041.08	
<b>Instructional Employee Related Cost</b>							
Regular Instructional Staff							
	Regular Education Teachers Salaries	\$630,000	\$645,750	\$1,323,788	\$1,646,663	\$2,088,937	
	Regular Education Teachers Benefits	\$217,350	\$217,350	\$434,700	\$543,375	\$720,683	Assumes 34.5% for taxes and benefit allocation
	ELL Teachers Salaries	\$46,668	\$46,671	\$119,004	\$142,340	\$192,570	Assume annual salary increase of 2.5% per year
	Special Education Teachers Salaries	\$108,579	\$111,293	\$222,654	\$282,510	\$325,737	
	ELL & Special Education Teachers Benefits	\$37,460	\$38,396	\$76,816	\$97,466	\$112,379	
	Success Coaches/Counselor Salaries	\$40,008	\$41,008	\$82,041	\$104,096	\$126,702	
	Support Staff Benefits	\$6,900	\$6,900	\$28,304	\$35,913	\$43,712	
Total - Instructional Employee Related Costs		\$1,086,965	\$1,107,368	\$2,287,507	\$2,852,363	\$3,610,729	
<b>Instructional Program Costs</b>							
General Ed Instructional Program							
	Student Testing and Assessment	\$75,000	\$75,000	\$238,913	\$328,252	\$422,811	
	School Extracurricular Activities	\$37,500	\$37,500	\$119,457	\$164,126	\$211,406	Academic field trips and graduation activities for
	Student Internet Access Hardware	\$50,000	\$50,000	\$53,043	\$54,636	\$56,275	

Curriculum & Materials, SBCVS System, and Instructional Support Services	\$0	\$650,000	\$650,000	\$1,950,000	\$2,600,000	\$3,250,000	See attached price list for costs					
Student Technology Assistance Services	\$0	\$150,000	\$150,000	\$300,000	\$375,000	\$450,000	See attached price list for costs					
Student Computers & Software	\$0	\$309,825	\$100,450	\$190,700	\$235,825	\$255,000	See attached price list for costs (Assumption explanation below*)					
Staff Training /PD (Teachers)	\$0	\$6,348	\$13,146	\$20,369	\$28,123	\$35,945						
<b>Regular Instructional Program</b>	<b>\$0</b>	<b>\$1,278,673</b>	<b>\$1,076,096</b>	<b>\$2,872,484</b>	<b>\$3,785,962</b>	<b>\$4,681,437</b>						
Special Ed Instructional Program												
State Testing (Travel & Administration)	\$0	\$25,000	\$25,761	\$26,546	\$27,354	\$28,187						
IEP Management Software	\$0	\$2,500	\$2,563	\$2,627	\$2,692	\$2,760						
Alternative Curriculum	\$0	\$1,206	\$1,206	\$3,757	\$5,139	\$6,647						
Assistive Technology	\$0	\$24,279	\$24,279	\$75,602	\$103,432	\$133,763						
Special Education Direct Delivery Services	\$0	\$42,500	\$42,500	\$85,000	\$106,250	\$126,675						
<b>Special Ed Instructional Program</b>	<b>\$0</b>	<b>\$95,485</b>	<b>\$96,309</b>	<b>\$193,532</b>	<b>\$244,867</b>	<b>\$298,032</b>						
<b>Total - Instructional Program Costs</b>	<b>\$0</b>	<b>\$2,461,123</b>	<b>\$2,279,773</b>	<b>\$5,353,423</b>	<b>\$6,883,192</b>	<b>\$8,590,189</b>						

St. Isidore of Seville Catholic Virtual School - Base Budget		Start-up	FY 2024	FY 2025	FY 2026	FY 2027	FY 2028	Assumptions
<b>Administrative Employee Related Costs</b>								
Special Ed Admin Staff								
Manager of Special Education	\$0	\$0	\$0	\$0	\$0	\$80,000	\$82,000	
Special Education Coordinator	\$0	\$60,000	\$61,500	\$63,038	\$64,613	\$66,229	\$66,229	
SPEd Admin Benefits	\$0	\$20,700	\$21,218	\$21,748	\$49,892	\$51,139	\$51,139	
Head of School	\$8,333	\$100,000	\$102,500	\$105,063	\$107,689	\$110,381	\$110,381	
Principal(s)	\$0	\$0	\$0	\$85,000	\$87,125	\$89,303	\$89,303	
CTE Coordinator	\$0	\$75,000	\$76,875	\$78,797	\$80,767	\$82,786	\$82,786	
Student Services Coordinator	\$0	\$50,000	\$51,250	\$52,531	\$53,845	\$55,191	\$55,191	
Registrar	\$0	\$22,500	\$22,500	\$22,500	\$22,500	\$22,500	\$49,672	
Administrative Assistants	\$0	\$0	\$0	\$0	\$0	\$0	\$40,000	
Operations Manager	\$0	\$60,000	\$61,500	\$63,038	\$64,613	\$66,229	\$66,229	
Attendance/Testing Officer	\$0	\$0	\$0	\$0	\$0	\$0	\$42,000	
Administration Staff Benefits	\$2,875	\$113,850	\$116,696	\$148,939	\$152,662	\$184,769	\$184,769	
Bonus Allocation	\$0	\$44,097	\$77,688	\$114,843	\$151,960	\$189,917	\$189,917	
Stipends	\$0	\$20,000	\$20,600	\$21,218	\$21,855	\$22,510	\$22,510	

Total - Administrative Employee Related Costs		\$11,208	\$5,061,147	\$612,327	\$776,715	\$937,521	\$1,132,126
<b>Business Services &amp; Operations Cost</b>							
<b>Support Services - Administration</b>							
School Treasurer	\$0	\$75,000	\$77,284	\$79,638	\$82,063	\$84,566	Independently contracted services
Encumbrance Clerk	\$0	\$45,000	\$46,125	\$47,278	\$48,460	\$49,672	Independently contracted services
Staff Recruiting	\$19,446	\$5,634	\$4,692	\$4,968	\$5,012	\$5,406	Approximately \$250 per new hire
Legal Services	\$10,000	\$5,000	\$5,150	\$5,305	\$5,628	\$5,628	
Insurance - D&O and Liability	\$10,000	\$36,000	\$37,096	\$38,226	\$39,390	\$40,590	
Office Supplies	\$0	\$5,000	\$5,152	\$5,309	\$5,471	\$5,637	
Office Postage	\$0	\$1,000	\$1,030	\$1,062	\$1,094	\$1,127	
Copiers / Reproduction	\$0	\$4,000	\$4,122	\$4,247	\$4,377	\$4,510	
Association Dues	\$0	\$2,000	\$2,061	\$2,124	\$2,188	\$2,255	
Travel and Conferences (Admin Staff)	\$7,500	\$4,000	\$4,122	\$4,247	\$4,377	\$4,510	
Board Related Expenses	\$0	\$10,000	\$10,305	\$10,618	\$10,942	\$11,275	
Community Outreach and School Website	\$0	\$50,000	\$50,000	\$100,000	\$125,000	\$150,000	See attached price list for costs
Enrollment Processing Fee	\$0	\$50,000	\$50,000	\$100,000	\$125,000	\$150,000	See attached price list for costs
School Operations Support Services	\$0	\$255,925	\$268,806	\$569,222	\$688,197	\$825,504	See attached price list for costs
School Business Support Services	\$0	\$48,394	\$96,528	\$144,411	\$191,904	\$239,722	See attached price list for costs
Charter Authorizer Fee	\$0	\$24,197	\$48,264	\$72,206	\$95,952	\$119,861	Assumes an oversight fee of 1% of revenue
<b>Support Services - Administration</b>		\$46,946	\$621,150	\$710,737	\$1,188,861	\$1,435,602	\$1,701,950
<b>Miscellaneous</b>							
External Audit	\$0	\$15,000	\$15,457	\$15,928	\$16,413	\$16,912	
Admin Payroll Processing	\$0	\$22,986	\$22,986	\$64,347	\$86,699	\$111,317	See attached price list for costs (Assumption)
Banking Fees	\$0	\$1,000	\$1,030	\$1,062	\$1,094	\$1,127	
<b>Business</b>		\$0	\$38,986	\$59,299	\$81,237	\$104,205	\$129,357
<b>Pupil Health</b>							
Contracted Pupil Health Support	\$0	\$3,780	\$6,616	\$9,620	\$12,605	\$16,980	
<b>Total Support Services</b>		\$0	\$427,666	\$659,151	\$909,571	\$1,168,110	\$1,463,337
<b>Total - Business Services &amp; Operations Costs</b>							
		\$46,946	\$749,448	\$888,656	\$1,461,732	\$1,786,033	\$2,140,960

	Start-up	FY 2024	FY 2025	FY 2026	FY 2027	FY 2028	Assumptions
<b>Facilities Cost</b>							
Facilities & Maintenance Services	\$0	\$15,000	15,000	15,000	15,000	15,000	15,000 Assumes a 1,500 sq ft office @ \$10 per sq ft for
Office Rent Office Utilities	\$0	\$6,000	\$6,183	\$6,371	\$6,565	\$6,765	
Maintenance and Repair	\$0	\$3,750	\$3,864	\$3,982	\$4,103	\$4,228	
High Speed Internet & Telephone	\$0	\$5,000	\$5,152	\$5,309	\$5,471	\$5,637	
In Person Covid-19 Health Measures Furniture	\$0	\$2,500	\$2,576	\$2,655	\$2,735	\$2,819	
Fixtures and Equipment	\$0	\$5,000	\$2,576	\$2,655	\$2,735	\$2,819	
<b>Total - Facilities Costs</b>	<b>\$0</b>	<b>\$52,250</b>	<b>\$51,251</b>	<b>\$52,798</b>	<b>\$54,392</b>	<b>\$56,033</b>	
Debt Service / Other Expenditures	\$0	\$0	\$0	\$0	\$0	\$0	
Interest	\$0	\$0	\$0	\$0	\$0	\$0	
Principal	\$0	\$0	\$0	\$0	\$0	\$0	
Debt Service / Other Expenditures	\$0	\$0	\$0	\$0	\$0	\$0	
<b>Total Gross Expenses</b>	<b>\$58,155</b>	<b>\$3,828,068</b>	<b>\$3,832,007</b>	<b>\$7,644,568</b>	<b>\$9,661,138</b>	<b>\$11,919,308</b>	
<i>Arch OIC Invoice Credit</i>	<i>-\$58,155</i>	<i>-\$1,571,144</i>	<i>-\$1,365,784</i>	<i>-\$3,354,333</i>	<i>-\$4,340,926</i>	<i>-\$5,220,228</i>	<i>Credits for Fees to balance school budget</i>
<b>Total Net Expenses</b>	<b>\$0</b>	<b>\$2,314,824</b>	<b>\$2,466,223</b>	<b>\$4,290,235</b>	<b>\$5,320,212</b>	<b>\$6,699,082</b>	
Surplus (Deficit)	\$0	\$2,444,229	\$221,834	\$1,398,987	\$1,561,765	\$1,655,959	
Surplus (Deficit) %	0%	1.0%	1.0%	1.0%	1.0%	1.0%	
Fund Balance	\$0	\$217,350	\$217,350	\$434,700	\$544,375	\$720,683	
Fund Balance	0%	1.0%	1.0%	2.0%	2.5%	3.0%	

\*The Computer Fee of \$425 per enrollment applies to every new enrollment. Additionally, student chum of 15% is taken into account, so the Computer Fee also applies to in-year backfill enrollments. Returning students are not charged the Computer Fee.  
 \*\*The Enrollment Processing Fee of \$100 per enrollment applies to new enrollments and based on net new enrollments only. See attachment for calculation support for both fees above.

**Additional Detail on Computer Fee Calculation**

Enrollments	500	500	1000	1250	1500
Fee Per Computer, Chromebook Go includes data plan with T-Mobile, AT&T, Verizon-2 year contracts	425	425	425	425	425

<i>Gross Computer Fees</i>	212500	0	0	0	0	0
Churn Rate	15%	15%	15%	15%	15%	15%
Churn Count	75	75	150	187	225	225
<i>Churn Computer Fees</i>	31875	31875	63750	79475	95625	95625
Retention Rate	75%	75%	75%	75%	75%	75%
Prior Year Retained Students	0	375	750	937	1125	1125
New Students	0	125	250	313	375	375
<i>New Student Computer Fees</i>	53125	\$106,250	\$133,025	\$159,375	\$159,375	\$159,375
<i>Faculty Laptops with applications- Lenova, with dock, monitor: 25</i>	50,000					
<b>Total Device Cost</b>	<b>\$294,375</b>	<b>\$85,000.0</b>	<b>\$170,000</b>	<b>\$212,500</b>	<b>\$255,000</b>	<b>\$255,000</b>
Student Usage Device Management- Go Guardian. \$10.50/device	\$5,250	\$5,250.0	\$10,500	\$13,125	\$15,750	\$15,750
100 Hot spots for additional internet access as needed \$8.50/mo or less- 25 for teachers/staff and 75 available for students	\$10,200	\$10,200	\$10,200	\$10,200	\$10,200	\$10,200
Total Technology costs for Student Devices	<b>\$309,825</b>	<b>\$100,450</b>	<b>\$190,700</b>	<b>\$235,825</b>	<b>\$280,961</b>	<b>\$280,961</b>
<b>Gross New Enrollments</b>	<b>500</b>	<b>500</b>	<b>1000</b>	<b>1250</b>	<b>1500</b>	<b>1500</b>
<b>Total Enrollment</b>	<b>\$50,000</b>	<b>\$50,000</b>	<b>\$100,000</b>	<b>\$125,000</b>	<b>\$150,000</b>	<b>\$150,000</b>







