

**Steven Harpe**  
State Chief Operating Officer  
Deputy Secretary of Digital  
Transformation and Administration  
Director, Office of Management and  
Enterprise Services



**OKLAHOMA**

**J. Kevin Stitt**  
Governor

December 27, 2021

Jamie Rosenberg  
Chief Executive Officer  
ClassWallet  
1-877-969-5536  
jrosenberg@classwallet.com

RE: Geer1 Bridge-the-Gap Program Expenditures

Dear Mr. Rosenberg:

This letter shall serve to place ClassWallet on notice of the State of Oklahoma's intent to recover funds distributed by ClassWallet for unintended and potentially fraudulent purposes. The State of Oklahoma will further seek to recover those funds for which no detailed use has been documented or provided by ClassWallet.

The State relied on ClassWallet's representations made in the discussions leading up to and in the contract between the State of Oklahoma and Cleo Inc., d/b/a ClassWallet effective August 6, 2020 for the development and administration of student directed grant programs. This included reliance on ClassWallet's Application System and Fiscal Management and Payment System to be in compliance with the State's use of GEER funds. The State's contract with ClassWallet was made with the purpose of contracting with a vendor to administer the State's GEER funds for the Stay in School and Bridge the Gap programs. Responsibilities for administering the programs include receiving and processing applications, determining which applicants qualified, and providing the allotted funds to the individual qualified recipients as determined by ClassWallet. Additionally, ClassWallet was selected and contracted to create, maintain, and operate a system for accounting of funds as well as reporting needs for the use of GEER funds.

Pursuant to 2 C.F.R § 200.332, the State of Oklahoma has reviewed the expenditures ClassWallet reported as subrecipients of the Governor's Emergency Education Relief Fund's Bridge the Gap Digital Wallet program to determine eligibility. In response, the State requests ClassWallet provide additional information substantiating the educational uses of the attached purchases. Please provide documentation to my office justifying the educational context for purchases on the attached spreadsheet by January 15, 2022.

Further, ClassWallet's final report on the program indicates \$6,124,280.44 of programmatic spend while the spreadsheet of itemized expenditures only provides detail for \$4,501,935.57.

Please provide the detail for the remaining \$1,622,344.87 of expenditures made under the program or return the funds to the State of Oklahoma by January 15, 2022.

Respectfully,

A handwritten signature in black ink, appearing to read 'SHA', with a horizontal line extending to the right.

Stephen Harpe  
Oklahoma State Chief Operating Officer  
Deputy Secretary of Digital Transformation and Administration  
Director, Office of Management and Enterprise Services

cc: Renee Launey-Rodolf, OEQA Director