

## VOLUME 0

## CONGRESSIONAL TRANSMITTAL

Shawnee Instrument of Transfer Land - Case Study Packet

Prepared for congressional constituent-service and federal-records review

Shawnee, Oklahoma | Source period: 1947-2026

## Purpose of Submission

This packet requests congressional assistance obtaining an authoritative federal reconciliation of property associated with the 1947 Shawnee Instrument of Transfer and later Shawnee Regional Airport property transactions. It does not presume misconduct or ask the congressional office to make a legal determination.

### To: Office of U.S. Senator James Lankford

**Attn:** Cedon H., Field Representative

**Re:** Federal records assistance and parcel-by-parcel reconciliation concerning the 1947 Shawnee Instrument of Transfer

Dear Cedon:

Thank you for previously discussing the Shawnee land issue with me. Since that conversation, I have assembled a substantially larger documentary record involving the 1947 Instrument of Transfer, Shawnee Regional Airport property, later leases, City and Airport Authority memoranda, surveys, deeds, appraisal references, and modern FAA-related transactions.

The focused question is which portions of the property conveyed by the United States remain federally obligated, which have been released or reclassified, what conditions govern identified non-aeronautical uses, and how lease revenue or disposition proceeds were required to be treated.

### Requested Assistance

- Forward the enclosed federal questions to FAA and appropriate federal property-record custodians.
- Request current and historical Airport Property Maps/Exhibit A documents and a complete release/reclassification schedule.
- Request the FAA approval file associated with the 2011 Expo lease amendment.
- Request a written explanation of the federal status and applicable revenue requirements for the identified parcels and uses.
- Identify any additional federal custodian holding War Assets Administration or former Shawnee Naval Air Station conveyance records needed to complete the chain.

Respectfully submitted,

**Kenneth R. Crawford**

Shawnee, Oklahoma

Integrity of the Game vs. Economic Impact (Politics); The Oklahoma Business Plan

VOLUME I

EXECUTIVE CONGRESSIONAL BRIEF

Federal reconciliation request | Shawnee Instrument of Transfer | 1947-2026

Prepared for congressional constituent-service and federal-records review

Shawnee, Oklahoma | Source period: 1947-2026

Executive Congressional Brief

**Issue presented.** Local records document decades of aeronautical, commercial, recreational, governmental and economic-development uses involving Shawnee airport-associated property. The available local record does not provide a single authoritative parcel-by-parcel reconciliation showing which property remains subject to the 1947 federal conveyance, which property has been released or reclassified, what conditions apply to each parcel, and how revenue from federally obligated property was required to be handled.

Why Federal Assistance Is Appropriate

- The 2011 Expo transaction directly referenced the November 20, 1947 Instrument of Transfer and made the lease subject to FAA approval.
- In 2022, Shawnee documented an FAA-authorized non-aeronautical reclassification process for a 40-acre National Guard project, including appraisal-based fair-market value, CPI escalation and airport-directed revenue.
- Multiple commercial airport leases use FMV, appraisal, CPI, federal-subordination or FAA-regulatory language, providing concrete transactions for federal reconciliation.
- The YMCA record contains a 1964 lease lineage for approximately 4.81 acres at 700 W. Saratoga, renewed for 50 years through 2064, while Lions Club Park is governed by a separate recreational arrangement.

Core Documentary Findings

| Record / transaction | What the record establishes                                                                                              | Why it matters                                                 |
|----------------------|--------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------|
| 1947 framework       | Federal conveyance is the historical starting point; current parcel status requires reconciliation.                      | Defines the federal land to be reconciled.                     |
| 2011 Expo            | Former airport land history; modern lease expressly tied to the 1947 Instrument of Transfer.                             | One and the same property tied to the federal conveyance.      |
| 2022 National Guard  | FAA-authorized non-aeronautical use; appraisal-based FMV; 40 acres at \$176,000/year plus a 3% airport-directed revenue. | Shows how a modern transaction is tied to the federal process. |
| Commercial portfolio | Brown Derby, Shawnee Lube, 1836 N. Kickapoo, 702 W. Independence and others identified by GIS analysis.                  | Shows how a modern transaction is tied to the federal process. |
| YMCA / Lions Club    | Long-term YMCA institutional lease and separate Lions Club recreational agreement.                                       | Prevents conflating distinct properties.                       |

## What This Packet Does Not Conclude

- It does not conclude that Shawnee violated the 1947 Instrument of Transfer.
- It does not conclude that airport revenue was diverted.
- It does not conclude that nominal-rent community leases were improper or that commercial leases were below fair market value.
- It does not treat older secondary analyses as proof of federal parcel status.

## Requested Federal Deliverable

**A written parcel-by-parcel reconciliation identifying the original federal conveyance, subsequent releases or reclassifications, current federal obligations, FAA approvals, applicable valuation/revenue requirements, and the federal records supporting each determination.**

## Priority Questions for Federal Review

- Which parcels conveyed under the 1947 Instrument remain federally obligated today?
- Which parcels have been released, disposed of, reclassified or otherwise relieved of original restrictions, and on what dates and conditions?
- What FAA approval was issued for the 2011 Expo lease amendment that expressly referenced the 1947 Instrument?
- What federal status applies to the YMCA property at 700 W. Saratoga and to the Lions Club property?
- What federal approvals or FMV determinations applied to Shawnee Lube, Brown Derby, 702 W. Independence, 1836 N. Kickapoo and other non-aeronautical commercial uses?
- What airport-revenue requirements applied to revenue generated from federally obligated property?
- Can FAA reconcile the current Airport Property Map/Exhibit A with the original 1947 conveyance and all subsequent releases?

## Priority Missing Records

- Complete federal conveyance/release/reclassification file and historical Airport Property Maps.
- FAA approval file for the 2011 Expo amendment.
- Original 1964 YMCA lease and amendments/assignments.
- 2012 Shawnee Lube extension to 2054 and supporting valuation/approval records.
- 2017 Brown Derby appraisal and original 1988 agreement.
- Original Heavenly Grind FMV documentation for 1836 N. Kickapoo.
- Historical airport lease receipts/accounting sufficient to trace revenue into airport accounts.

## Recommended Staff Review Sequence

**1.** Read this Executive Brief. **2.** Review Volume II for the documentary chronology. **3.** Use Volume III as the agency-facing records request. **4.** Use Volume IV as the working parcel/transaction checklist.

VOLUME II

# COMPREHENSIVE DOCUMENTARY CASE STUDY

Shawnee Instrument of Transfer Land

Prepared for congressional constituent-service and federal-records review

Shawnee, Oklahoma | Source period: 1947-2026

## Document Navigation

This page clearly identifies **VOLUME II**. Section headings use dark navy/blue text on white, and mastheads use white text on dark navy for high contrast.

VOLUME II

# SHAWNEE INSTRUMENT OF TRANSFER LAND

Comprehensive Documentary Case Study, 1947-2026

Prepared for congressional constituent-service and federal-records review

Shawnee, Oklahoma | Source period: 1947-2026

**Purpose:** organize the available documentary record, identify unresolved federal-property questions, and request a parcel-by-parcel reconciliation from the appropriate federal agencies. This packet does not presume misconduct or make a legal determination.

## 1. Scope and Evidentiary Method

This study separates primary contemporaneous records from later analytical summaries. Primary sources include the 1947 Instrument of Transfer, executed leases and amendments, City/Airport memoranda, governing-body agendas, surveys, deeds and assessor records. Earlier Holistic Analysis and Shawnee DOGE summaries are treated as research roadmaps where their conclusions are not independently established by primary records.

**Statements that a specific parcel is Instrument-of-Transfer land are treated as unresolved unless supported by the federal conveyance, a legal-description/title match, an FAA property map, or a federal release/approval record.**

## 2. Federal Origin: 1947 Instrument of Transfer

The recorded Instrument shows the United States, acting through the War Assets Administrator, transferring former Shawnee Naval Air Station property to the City of Shawnee under the Surplus Property Act framework. It describes multiple tracts and imposes reservations, restrictions and covenants. The visible covenant pages include public-airport-use requirements, maintenance obligations, limits on non-aviation use, federal emergency-use rights, a prohibition on exclusive airport rights, controls on later airport transfers, and a federal reversion option upon breach.

**Source:** Instrument of Transfer.pdf, Deed Record 179, filed November 26, 1947.

### Figure 1. 1947 Instrument - covenant/public-airport-use page

said tract containing after said exceptions 135 acres, more or less.

5. Also the North Half (N $\frac{1}{2}$ ) of the Southwest Quarter (SW $\frac{1}{4}$ ) of the Southeast Quarter (SE $\frac{1}{4}$ ) of Section Twelve (12), Township Ten (10) North, Range Three (3) East, containing 20 acres, more or less;

6. Also the Northwest Quarter (NW $\frac{1}{4}$ ) of the Southeast Quarter (SE $\frac{1}{4}$ ) of Section Twelve (12), Township Ten (10) North, Range Three (3) East, excepting therefrom an area described as follows:

(a) Beginning at the Northeast corner of the Northwest Quarter (NW $\frac{1}{4}$ ) of the Southeast Quarter (SE $\frac{1}{4}$ ) of Section Twelve (12), Township Ten (10) North, Range Three (3) East; thence South 1050 feet; thence North 45 degrees West to a point on the North line of the said Southeast Quarter (SE $\frac{1}{4}$ ) of Section Twelve (12), said point being 1050 feet West of the point of beginning; thence 1050 feet East to the point of beginning;

said tract containing after said exceptions 27.4 acres, more or less.

The total area of the above six (6) tracts being 361.4 acres, more or less.

7. Lots Twenty-five (25) to Twenty-seven (27) inclusive, and the West Fifteen (15) feet of Lot Twenty-eight (28), all located in Block Four (4); and Lots Thirteen (13) to Twenty-four (24) inclusive, all located in Block Five (5), University Grounds Addition, City of Shawnee, Oklahoma.

The party of the second part does hereby release the party of the first part from any and all claims which exist or may arise under the provisions of the aforesaid lease, except claims which may be submitted under Section 17 of the Federal Airport Act.

Said property transferred hereby was duly declared surplus and was assigned to the War Assets Administrator for disposal, acting pursuant to the provisions of the Surplus Property Act of 1944, as amended, Executive Order 9689, and applicable rules, regulations and orders.

That by the acceptance of this instrument or any rights hereunder, the said party of the second part, for itself, its successors and assigns, agrees that the aforesaid surrender of lesshold interest and transfer of other property shall be subject to the following restrictions, set forth in subparagraphs (1) and (2) of this paragraph, which shall run with the land, imposed pursuant to the authority of Article 4, Section 3, Clause 2 of the Constitution of the United States of America, the Surplus Property Act of 1944, as amended, Executive Order 9689, and applicable rules, regulations and orders:

(1) That the aforesaid leased premises and all property described above which together shall hereinafter be called the "airport", shall be used for public airport purposes, and only for such purposes (except for the building areas, non-aviation facilities and non-airport property, within the limitations of subparagraph (2) of the next succeeding paragraph), on reasonable terms and without unjust discrimination and without grant or exercise of any exclusive right for use of the airport within the meaning of Section 508 of the Civil Aeronautics Act of 1938. As used herein, "public airport purposes" shall be deemed to exclude use of the structures conveyed hereby, or any portion thereof, for manufacturing or industrial purposes. However, until, in the opinion of the Civil Aeronautics Administration or its successor Government agency, it is needed for public airport purposes, any particular structure transferred hereby may be utilized for non-manufacturing or non-industrial purposes in such manner as the party of the second part deems advisable, provided that such use does not interfere with operation of the remainder of the airport as a public airport.

(2) That the entire landing area, as defined in WAA Regulation 16, dated June 25, 1946, and all structures, improvements, facilities and equipment of the airport shall be maintained at all times in good and serviceable condition to assure its efficient operation; provided, however, that such maintenance shall be required as to structures, improvements, facilities and equipment only during the remainder of their estimated life as determined by the Civil Aeronautics Administration or its successor Government agency. In the event materials are facilities or equipment, they may be procured by demolition of other structures, improvements, facilities or equipment transferred hereby and located on the above described premises, which have outlived their use as airport property in the opinion of the Civil Aeronautics Administration or its successor Government agency.

That by the acceptance of this instrument, or any rights hereunder, the party of the second part, for itself, its successors and assigns, also assumes the obligations of, covenants to abide by and agrees to, and this surrender and transfer is made subject to, the following reservations and restrictions set forth in subparagraphs (1) to (6) of this paragraph, which shall run with the land, imposed pursuant to the authority of Article 4, Section 3, Clause 2 of the Constitution of the United States of America, the Surplus Property Act of 1944, as amended, Executive Order 9689 and applicable rules, regulations and orders:

(1) That insofar as is within its power and reasonably possible, the party of the second part, and all subsequent transferees, shall prevent any use of land either within or outside the boundaries of the airport, including the construction, erection, alteration, or growth of any structure or other object thereon, which use would be a hazard to the landing, taking-off, or maneuvering of aircraft at the airport, or otherwise limit its usefulness as an airport.

(2) That the building areas and non-aviation facilities, as such terms are defined in WAA Regulation 16, dated June 25, 1946, of or on the airport shall be used, altered, modified, or improved only in a manner which does not interfere with the efficient operation of the landing area and of the airport facilities, as defined in said WAA Regulation 16.

(3) That itinerant aircraft owned by the United States of America (hereinafter sometimes referred to as the "Government"), or operated by any of its employees or agents on Government business, shall at all times have the right to use the airport in common with others; provided, however, that such use may be limited as may be determined at any time by the Civil Aeronautics Administration or the successor Government agency to be necessary to prevent interference with use by other authorized aircraft, so long as such limitation does not restrict the Government's use to less than twenty-five (25) per centum of capacity of the landing area of the airport.

### 3. 2011 Expo Transaction: Direct Modern Reference to the 1947 Instrument

The 2011 Expo lease is a central bridge between the original conveyance and modern property administration. It states that the agreement is subject to FAA rules and to the terms and conditions of the November 20, 1947 Instrument of Transfer. It separately states that the lease is subject to FAA approval. The lease describes approximately 90.53 acres, a forty-year term commencing December 1, 1988, and nominal rent of \$1 per year, together with maintenance and fencing obligations.

The City memorandum reconstructs a chain involving a 24.496-acre former-airport tract transferred to SCCDA in 1979, transferred to the Shawnee Municipal Authority in 1986, additional leases in 1988, an expired shorter-term lease that remained in use, and a 2011 consolidation of approximately 90.53 acres under SCCDA management and control.

Sources: 653\_EXPO Lease Agreement; 667\_EXPO Memo; 667\_EXPO deed SMA2City.

### 4. 2022 National Guard Transaction: Modern Federal Compliance Model

In September 2022, Airport Manager Bonnie Wilson reported that FAA had authorized west-side airport land for non-aeronautical purposes. The memorandum states that FAA Order 5190.6B requires airports to receive fair market value for non-aeronautical use, with FMV established by appraisal, subject to limited exceptions. Because the contemplated Guard units did not have an aeronautical mission, Shawnee structured a two-step transaction: the City would lease 40 acres from the Airport Authority at FMV and then lease the property to OMD for nominal value.

The documented FMV payment was \$0.10 per square foot, or \$174,240 annually, with CPI escalation. Airport staff stated that the resulting Airport Authority funds would support local matching shares for FAA grant-funded capital projects, capital repairs to airport-owned facilities and capital equipment. The SAA-to-City agreement also subordinates the lease to federal agreements required as a condition precedent to transfer of federal rights or property for airport purposes or expenditure of federal funds.

Sources: 5988\_COS\_SAA\_RE\_OKARNG\_LEASE\_MEMO\_FV; 5988\_SAA\_to\_COS\_10\_3\_2022; 5997\_COS\_to\_OMD\_Memo\_FV; 5997\_COS\_to\_ANG\_10\_3\_2022.

### 5. Airport Lease Policy and Revenue Accounting

The October 2019 Airport Facilities Lease and Development Policy formalized periodic valuation and annual rate-adjustment concepts. The May 2, 2022 rental-rate memorandum applied a 7% CPI increase and projected \$8,515.36 in additional annual revenue. It identified Shawnee Airport Authority Fund revenue accounts 511-46250 (Airport Rental Revenue) and 511-46260 (Hangar Rental Revenue). These accounts provide a concrete starting point for tracing later airport lease receipts.

Sources: 5741\_SAA\_3\_Lease-Policy\_Statement; 5741\_SAA\_3\_Rental\_Rates\_Memo.

### 6. Commercial Non-Aeronautical Portfolio

| Property / transaction | Documented use                             | Area / rent evidence                                               | Key unresolved federal question                                                  |
|------------------------|--------------------------------------------|--------------------------------------------------------------------|----------------------------------------------------------------------------------|
| Brown Derby            | Commercial restaurant                      | 23,400 SF; 2017 rate \$0.16/SF; 2021 rent \$3,792/year             | Obtain 2017 appraisal, 1988 lease, federal status and approval history.          |
| Shawnee Lube           | Non-aviation auto service                  | 0.57 ac expanded to 0.71 ac; 2017 \$7,414/year amendment           | Obtain 2012 extension to 2054 and valuation/federal review.                      |
| 1836 N. Kickapoo       | Drive-through coffee/bagel                 | 8,462 SF; \$1,620/year; memo says original rate based on FMV + CPI | Obtain Heavenly Grind original FMV documentation and parcel status.              |
| 702 W. Independence    | Retail/recreation / commercial             | 7,200 SF building + 35,305 SF land; \$12,000/year original rent    | Obtain appraisal/FMV basis, federal classification and complete revenue history. |
| Vyve / Armory          | Commercial call center in airport building | \$750/month increased to \$775/month                               | Obtain 2015 original lease, building/land federal status and valuation basis.    |

| Property / transaction | Documented use               | Area / rent evidence                               | Key unresolved federal question                              |
|------------------------|------------------------------|----------------------------------------------------|--------------------------------------------------------------|
| Metro Mart Tract #23   | Commercial airport leasehold | 2.48 acres; private leasehold financing documented | Obtain 2008 lease, rent/FMV basis and federal tract history. |

**The raw rent figures are not treated as proof of underpricing or unequal treatment. The parcels, improvements, dates, obligations and classifications differ. The relevant test is procedural: what federal classification applied, what valuation or exception applied, what approvals existed, and where did revenue go?**

## 7. YMCA and Lions Club: Two Distinct Property Tracks

**YMCA institutional property.** A 2014 Memorandum of Lease identifies approximately 4.81 acres at 700 W. Saratoga and traces the underlying lease to February 19, 1964. It records a 50-year extension from 2014 through February 18, 2064. The August 2014 agenda places renewal of the 1964 lease before the Shawnee Airport Authority. The underlying 1964 lease and amendments remain essential.

**Lions Club Park.** The separate 2013 Lions Club agreement followed termination of the SYAA arrangement. The YMCA agreement used nominal cash consideration but imposed substantial maintenance, reporting and operating duties while the City retained specified utility and major-repair responsibilities. A 2020 mower lease documents additional City-owned equipment supporting Lions Club maintenance.

The two tracks should not be conflated. The key federal question is whether either footprint was within federally obligated property during the relevant periods and, if so, what classification, exception or approval governed the use.

**Sources:** 2130 YMCA Memorandum; YMCA Airport Authority agenda; 1628 Lions Club package; 4946 mower agreement.

## 8. The 80-Acre Parcel and Parcel-Reconciliation Problem

The uploaded assessor record identifies a City-owned 80-acre parent parcel at W. Independence & Kickapoo and references improvements on leased land, including Pitt Stop, Brown Derby, Oklahoma Jet Works, YMCA and airport improvements. Lease surveys for Brown Derby and Shawnee Lube provide legal-description anchors in Section 12. These records are useful for mapping but do not, by themselves, establish the continuing federal status of every footprint.

### Figure 2. County assessment record card - visual property reference

**Pottawatomie**  
**Assessment Property Record Card for Tax Year 2025**  
 Data provided by Leona Satterfield County Assessor

Date: 01/31/2025  
 Time: 10:51:50  
 Page: 1

| <b>Assessment Data</b><br>Account 630009540<br>Parcel ID 0000-12-010-003-0-001-00<br>Cadastral ID 0000-010-003-12-0-001-00<br>Property Type REAL - Real Property<br>Property Class E<br>Tax Area 218 - 93 Shawnee<br>Name ID 18576<br>CITY OF SHAWNEE<br><br>P O BOX 1448<br>SHAWNEE OK 74802-1448<br><br><b>Parcel Location</b><br>Situs W INDEP & KICKAPOO<br>Subdivision /<br>Lot/Block / Parcel Size 80 - Acres<br>Sec/Twp/Rng 12 / 10 / 3 / 0<br>Neighborhood -<br>School District 93 - 93-R Shawnee                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                               | <b>Primary Image</b><br><br>\pictures\0000-12-010-003-0-001-00N.jpg 11/18/2004 |                  |              |            |               |            |                              |            |             |                |                 |                               |         |     |         |          |                              |                |                 |         |   |   |  |     |         |                |                 |                |   |   |   |     |      |                |                 |      |                |   |   |     |      |              |                 |     |      |   |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |
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| <b>Legal Description</b><br>W1/2 SE SW & SW SW & E1/2 E1/2 SW SE & NW SW SE -IMPS ON<br>LEASED LAND PITTSBURGH, TILE BLDG, ROLLER BLDG, CAR<br>WASH, BROWN DERY, CABLE TV, OKLAHOMA JET<br>WORKS, YMCA, AIRPORT IMPS.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                               |                                                                                                                                                                  |                  |              |            |               |            |                              |            |             |                |                 |                               |         |     |         |          |                              |                |                 |         |   |   |  |     |         |                |                 |                |   |   |   |     |      |                |                 |      |                |   |   |     |      |              |                 |     |      |   |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |
| <b>Building Permits</b> <table border="1"> <thead> <tr> <th>Number</th> <th>Description</th> <th>Opened</th> <th>Closed</th> <th>Amount</th> </tr> </thead> <tbody> <tr> <td>20240847</td> <td>COMM REMODEL-AMERICAN LEGION</td> <td>06/2024</td> <td></td> <td>200</td> </tr> <tr> <td>20231798</td> <td>COMMERCIAL REMODEL-VYVE BLDG-</td> <td>06/2023</td> <td></td> <td>400,000</td> </tr> <tr> <td>20230572</td> <td>COMMERCIAL REMODEL-SHAWNEE L</td> <td>05/2023</td> <td></td> <td>100,000</td> </tr> </tbody> </table>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                               | Number                                                                                                                                                           | Description      | Opened       | Closed     | Amount        | 20240847   | COMM REMODEL-AMERICAN LEGION | 06/2024    |             | 200            | 20231798        | COMMERCIAL REMODEL-VYVE BLDG- | 06/2023 |     | 400,000 | 20230572 | COMMERCIAL REMODEL-SHAWNEE L | 05/2023        |                 | 100,000 |   |   |  |     |         |                |                 |                |   |   |   |     |      |                |                 |      |                |   |   |     |      |              |                 |     |      |   |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |
| Number                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Description                   | Opened                                                                                                                                                           | Closed           | Amount       |            |               |            |                              |            |             |                |                 |                               |         |     |         |          |                              |                |                 |         |   |   |  |     |         |                |                 |                |   |   |   |     |      |                |                 |      |                |   |   |     |      |              |                 |     |      |   |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |
| 20240847                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | COMM REMODEL-AMERICAN LEGION  | 06/2024                                                                                                                                                          |                  | 200          |            |               |            |                              |            |             |                |                 |                               |         |     |         |          |                              |                |                 |         |   |   |  |     |         |                |                 |                |   |   |   |     |      |                |                 |      |                |   |   |     |      |              |                 |     |      |   |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |
| 20231798                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | COMMERCIAL REMODEL-VYVE BLDG- | 06/2023                                                                                                                                                          |                  | 400,000      |            |               |            |                              |            |             |                |                 |                               |         |     |         |          |                              |                |                 |         |   |   |  |     |         |                |                 |                |   |   |   |     |      |                |                 |      |                |   |   |     |      |              |                 |     |      |   |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |
| 20230572                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | COMMERCIAL REMODEL-SHAWNEE L  | 05/2023                                                                                                                                                          |                  | 100,000      |            |               |            |                              |            |             |                |                 |                               |         |     |         |          |                              |                |                 |         |   |   |  |     |         |                |                 |                |   |   |   |     |      |                |                 |      |                |   |   |     |      |              |                 |     |      |   |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |
| <b>Exemptions</b> <table border="1"> <thead> <tr> <th>Code</th> <th>Type</th> <th>Active</th> <th>Maximum</th> <th>Exemption</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                               | Code                                                                                                                                                             | Type             | Active       | Maximum    | Exemption     |            |                              |            |             |                |                 |                               |         |     |         |          |                              |                |                 |         |   |   |  |     |         |                |                 |                |   |   |   |     |      |                |                 |      |                |   |   |     |      |              |                 |     |      |   |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |
| Code                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Type                          | Active                                                                                                                                                           | Maximum          | Exemption    |            |               |            |                              |            |             |                |                 |                               |         |     |         |          |                              |                |                 |         |   |   |  |     |         |                |                 |                |   |   |   |     |      |                |                 |      |                |   |   |     |      |              |                 |     |      |   |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                               |                                                                                                                                                                  |                  |              |            |               |            |                              |            |             |                |                 |                               |         |     |         |          |                              |                |                 |         |   |   |  |     |         |                |                 |                |   |   |   |     |      |                |                 |      |                |   |   |     |      |              |                 |     |      |   |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |
| <b>Parcel Valuation</b> <table border="1"> <thead> <tr> <th>Source</th> <th>REAL</th> <th>Fair Cash</th> <th>Capped</th> <th>Asmnt Level</th> <th>Assessed</th> <th>Levy Rate</th> <th>103.020</th> <th>Current Tax</th> </tr> </thead> <tbody> <tr> <td>Remove Cap</td> <td></td> <td>0</td> <td>0</td> <td>12%</td> <td>0</td> <td>Assessed</td> <td>0</td> <td>0.00</td> </tr> <tr> <td>Year Frozen</td> <td></td> <td>0</td> <td>0</td> <td></td> <td>0</td> <td>Penalty</td> <td>0</td> <td>0.00</td> </tr> <tr> <td>Uncapped Value</td> <td>0</td> <td>0</td> <td>0</td> <td></td> <td>0</td> <td>Exemption</td> <td>0</td> <td>0.00</td> </tr> <tr> <td>TIF Project ID</td> <td>0</td> <td>0</td> <td>0</td> <td></td> <td>0</td> <td>Total Taxable</td> <td>0</td> <td>0.00</td> </tr> </tbody> </table>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                               | Source                                                                                                                                                           | REAL             | Fair Cash    | Capped     | Asmnt Level   | Assessed   | Levy Rate                    | 103.020    | Current Tax | Remove Cap     |                 | 0                             | 0       | 12% | 0       | Assessed | 0                            | 0.00           | Year Frozen     |         | 0 | 0 |  | 0   | Penalty | 0              | 0.00            | Uncapped Value | 0 | 0 | 0 |     | 0    | Exemption      | 0               | 0.00 | TIF Project ID | 0 | 0 | 0   |      | 0            | Total Taxable   | 0   | 0.00 |   |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |
| Source                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | REAL                          | Fair Cash                                                                                                                                                        | Capped           | Asmnt Level  | Assessed   | Levy Rate     | 103.020    | Current Tax                  |            |             |                |                 |                               |         |     |         |          |                              |                |                 |         |   |   |  |     |         |                |                 |                |   |   |   |     |      |                |                 |      |                |   |   |     |      |              |                 |     |      |   |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |
| Remove Cap                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                               | 0                                                                                                                                                                | 0                | 12%          | 0          | Assessed      | 0          | 0.00                         |            |             |                |                 |                               |         |     |         |          |                              |                |                 |         |   |   |  |     |         |                |                 |                |   |   |   |     |      |                |                 |      |                |   |   |     |      |              |                 |     |      |   |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |
| Year Frozen                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                               | 0                                                                                                                                                                | 0                |              | 0          | Penalty       | 0          | 0.00                         |            |             |                |                 |                               |         |     |         |          |                              |                |                 |         |   |   |  |     |         |                |                 |                |   |   |   |     |      |                |                 |      |                |   |   |     |      |              |                 |     |      |   |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |
| Uncapped Value                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 0                             | 0                                                                                                                                                                | 0                |              | 0          | Exemption     | 0          | 0.00                         |            |             |                |                 |                               |         |     |         |          |                              |                |                 |         |   |   |  |     |         |                |                 |                |   |   |   |     |      |                |                 |      |                |   |   |     |      |              |                 |     |      |   |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |
| TIF Project ID                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 0                             | 0                                                                                                                                                                | 0                |              | 0          | Total Taxable | 0          | 0.00                         |            |             |                |                 |                               |         |     |         |          |                              |                |                 |         |   |   |  |     |         |                |                 |                |   |   |   |     |      |                |                 |      |                |   |   |     |      |              |                 |     |      |   |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |
| <b>Assessment History</b> <table border="1"> <thead> <tr> <th>Tax Year</th> <th>Statement Number</th> <th>Billed Owner</th> <th>Tax Area</th> <th>Total Value</th> <th>Exemptions</th> <th>Taxable Value</th> <th>Billed Tax</th> </tr> </thead> <tbody> <tr><td>2024</td><td>2024-630009540</td><td>CITY OF SHAWNEE</td><td>218</td><td></td><td>0</td><td></td><td>.00</td></tr> <tr><td>2023</td><td>2023-630009540</td><td>CITY OF SHAWNEE</td><td>218</td><td></td><td>0</td><td></td><td>.00</td></tr> <tr><td>2022</td><td>2022-630009540</td><td>CITY OF SHAWNEE</td><td>218</td><td></td><td>0</td><td></td><td>.00</td></tr> <tr><td>2021</td><td>2021-630009540</td><td>CITY OF SHAWNEE</td><td>218</td><td></td><td>0</td><td></td><td>.00</td></tr> <tr><td>2020</td><td>2020-0009540</td><td>CITY OF SHAWNEE</td><td>218</td><td></td><td>0</td><td></td><td>.00</td></tr> <tr><td>2019</td><td>2019-0009540</td><td>CITY OF SHAWNEE</td><td>218</td><td></td><td></td><td></td><td>.00</td></tr> <tr><td>2018</td><td>2018-0009540</td><td>CITY OF SHAWNEE</td><td>218</td><td></td><td></td><td></td><td>.00</td></tr> <tr><td>2017</td><td>2017-0009540</td><td>CITY OF SHAWNEE</td><td>218</td><td></td><td></td><td></td><td>.00</td></tr> <tr><td>2016</td><td>2016-0009540</td><td>CITY OF SHAWNEE</td><td>218</td><td></td><td></td><td></td><td>.00</td></tr> <tr><td>2015</td><td>2015-0009540</td><td>CITY OF SHAWNEE</td><td>218</td><td></td><td></td><td></td><td>.00</td></tr> <tr><td>2014</td><td>2014-0009540</td><td>CITY OF SHAWNEE</td><td>218</td><td></td><td></td><td></td><td>.00</td></tr> <tr><td>2013</td><td>2013-0009540</td><td>CITY OF SHAWNEE</td><td>218</td><td></td><td></td><td></td><td>.00</td></tr> <tr><td>2012</td><td>2012-0009540</td><td>CITY OF SHAWNEE</td><td>218</td><td></td><td></td><td></td><td>.00</td></tr> </tbody> </table> |                               | Tax Year                                                                                                                                                         | Statement Number | Billed Owner | Tax Area   | Total Value   | Exemptions | Taxable Value                | Billed Tax | 2024        | 2024-630009540 | CITY OF SHAWNEE | 218                           |         | 0   |         | .00      | 2023                         | 2023-630009540 | CITY OF SHAWNEE | 218     |   | 0 |  | .00 | 2022    | 2022-630009540 | CITY OF SHAWNEE | 218            |   | 0 |   | .00 | 2021 | 2021-630009540 | CITY OF SHAWNEE | 218  |                | 0 |   | .00 | 2020 | 2020-0009540 | CITY OF SHAWNEE | 218 |      | 0 |  | .00 | 2019 | 2019-0009540 | CITY OF SHAWNEE | 218 |  |  |  | .00 | 2018 | 2018-0009540 | CITY OF SHAWNEE | 218 |  |  |  | .00 | 2017 | 2017-0009540 | CITY OF SHAWNEE | 218 |  |  |  | .00 | 2016 | 2016-0009540 | CITY OF SHAWNEE | 218 |  |  |  | .00 | 2015 | 2015-0009540 | CITY OF SHAWNEE | 218 |  |  |  | .00 | 2014 | 2014-0009540 | CITY OF SHAWNEE | 218 |  |  |  | .00 | 2013 | 2013-0009540 | CITY OF SHAWNEE | 218 |  |  |  | .00 | 2012 | 2012-0009540 | CITY OF SHAWNEE | 218 |  |  |  | .00 |
| Tax Year                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Statement Number              | Billed Owner                                                                                                                                                     | Tax Area         | Total Value  | Exemptions | Taxable Value | Billed Tax |                              |            |             |                |                 |                               |         |     |         |          |                              |                |                 |         |   |   |  |     |         |                |                 |                |   |   |   |     |      |                |                 |      |                |   |   |     |      |              |                 |     |      |   |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |
| 2024                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 2024-630009540                | CITY OF SHAWNEE                                                                                                                                                  | 218              |              | 0          |               | .00        |                              |            |             |                |                 |                               |         |     |         |          |                              |                |                 |         |   |   |  |     |         |                |                 |                |   |   |   |     |      |                |                 |      |                |   |   |     |      |              |                 |     |      |   |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |
| 2023                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 2023-630009540                | CITY OF SHAWNEE                                                                                                                                                  | 218              |              | 0          |               | .00        |                              |            |             |                |                 |                               |         |     |         |          |                              |                |                 |         |   |   |  |     |         |                |                 |                |   |   |   |     |      |                |                 |      |                |   |   |     |      |              |                 |     |      |   |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |
| 2022                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 2022-630009540                | CITY OF SHAWNEE                                                                                                                                                  | 218              |              | 0          |               | .00        |                              |            |             |                |                 |                               |         |     |         |          |                              |                |                 |         |   |   |  |     |         |                |                 |                |   |   |   |     |      |                |                 |      |                |   |   |     |      |              |                 |     |      |   |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |
| 2021                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 2021-630009540                | CITY OF SHAWNEE                                                                                                                                                  | 218              |              | 0          |               | .00        |                              |            |             |                |                 |                               |         |     |         |          |                              |                |                 |         |   |   |  |     |         |                |                 |                |   |   |   |     |      |                |                 |      |                |   |   |     |      |              |                 |     |      |   |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |
| 2020                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 2020-0009540                  | CITY OF SHAWNEE                                                                                                                                                  | 218              |              | 0          |               | .00        |                              |            |             |                |                 |                               |         |     |         |          |                              |                |                 |         |   |   |  |     |         |                |                 |                |   |   |   |     |      |                |                 |      |                |   |   |     |      |              |                 |     |      |   |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |
| 2019                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 2019-0009540                  | CITY OF SHAWNEE                                                                                                                                                  | 218              |              |            |               | .00        |                              |            |             |                |                 |                               |         |     |         |          |                              |                |                 |         |   |   |  |     |         |                |                 |                |   |   |   |     |      |                |                 |      |                |   |   |     |      |              |                 |     |      |   |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |
| 2018                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 2018-0009540                  | CITY OF SHAWNEE                                                                                                                                                  | 218              |              |            |               | .00        |                              |            |             |                |                 |                               |         |     |         |          |                              |                |                 |         |   |   |  |     |         |                |                 |                |   |   |   |     |      |                |                 |      |                |   |   |     |      |              |                 |     |      |   |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |
| 2017                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 2017-0009540                  | CITY OF SHAWNEE                                                                                                                                                  | 218              |              |            |               | .00        |                              |            |             |                |                 |                               |         |     |         |          |                              |                |                 |         |   |   |  |     |         |                |                 |                |   |   |   |     |      |                |                 |      |                |   |   |     |      |              |                 |     |      |   |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |
| 2016                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 2016-0009540                  | CITY OF SHAWNEE                                                                                                                                                  | 218              |              |            |               | .00        |                              |            |             |                |                 |                               |         |     |         |          |                              |                |                 |         |   |   |  |     |         |                |                 |                |   |   |   |     |      |                |                 |      |                |   |   |     |      |              |                 |     |      |   |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |
| 2015                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 2015-0009540                  | CITY OF SHAWNEE                                                                                                                                                  | 218              |              |            |               | .00        |                              |            |             |                |                 |                               |         |     |         |          |                              |                |                 |         |   |   |  |     |         |                |                 |                |   |   |   |     |      |                |                 |      |                |   |   |     |      |              |                 |     |      |   |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |
| 2014                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 2014-0009540                  | CITY OF SHAWNEE                                                                                                                                                  | 218              |              |            |               | .00        |                              |            |             |                |                 |                               |         |     |         |          |                              |                |                 |         |   |   |  |     |         |                |                 |                |   |   |   |     |      |                |                 |      |                |   |   |     |      |              |                 |     |      |   |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |
| 2013                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 2013-0009540                  | CITY OF SHAWNEE                                                                                                                                                  | 218              |              |            |               | .00        |                              |            |             |                |                 |                               |         |     |         |          |                              |                |                 |         |   |   |  |     |         |                |                 |                |   |   |   |     |      |                |                 |      |                |   |   |     |      |              |                 |     |      |   |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |
| 2012                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 2012-0009540                  | CITY OF SHAWNEE                                                                                                                                                  | 218              |              |            |               | .00        |                              |            |             |                |                 |                               |         |     |         |          |                              |                |                 |         |   |   |  |     |         |                |                 |                |   |   |   |     |      |                |                 |      |                |   |   |     |      |              |                 |     |      |   |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |      |              |                 |     |  |  |  |     |

## 9. Aeronautical Comparators

New Generation Aviation, Davis Martin Structures and Red Cloud Aviation provide aeronautical comparators. Their records show different rate methodologies and operational requirements from non-aeronautical commercial land uses. Red Cloud is particularly useful because Airport staff expressly described FAA Order 5190.6B treatment for an aeronautical use as requiring a reasonable rate and used a comparable airport office lease to establish the proposed rate.

These comparators reinforce that the packet should not compare all leases solely by dollars per square foot. Classification and transaction structure matter.

## 10. North Airport Property: Separate Branch, Federal Status Unresolved

The 1999-2015 SEDF package documents a large City-owned tract called North Airport Property in Section 7, Township 11 North, Range 4 East. The 1999 master lease used \$50 annual cash rent for an industrial-development arrangement; later uses included agricultural activity, a police range, biosolids application and other City functions. Because this geography differs from the principal Section 11-12 airport parcels, the packet treats North Airport as a separate branch until title research establishes whether it arose from the same federal conveyance or another acquisition.

## 11. Findings Supported by the Present Record

- The 1947 Instrument imposed continuing covenants and a federal reversion mechanism on transferred airport property.
- Shawnee continued to acknowledge federal subordination and FAA requirements in later airport leases.
- The 2011 Expo lease directly referenced the 1947 Instrument and required FAA approval.
- The 2022 National Guard transaction documents an FAA reclassification process, appraisal-based FMV requirement, CPI escalation and airport-directed use of FMV revenue.
- Shawnee administered numerous non-aeronautical commercial, community and governmental uses on airport-associated property.

- The present local record reviewed for this study does not itself supply a complete federal release/reclassification map from 1947 to the present.

## 12. What the Present Record Does Not Establish

- It does not establish that Shawnee violated the 1947 Instrument or FAA grant assurances.
- It does not establish that any particular lease was below FMV merely because its rent was nominal or lower than another lease.
- It does not establish that every parcel administered by the Airport Authority remained federally obligated at every relevant date.
- It does not establish revenue diversion without a complete accounting and the applicable federal obligation for each parcel.
- It does not establish that assessor sale-history fields are a complete chain of title.

## 13. Conclusion

**The record is sufficiently developed to justify a focused federal reconciliation. The most useful next step is not additional generalized local speculation; it is an authoritative federal parcel-by-parcel schedule tying the 1947 conveyance to releases, approvals, reclassifications, current Airport Property Maps and applicable revenue obligations.**

VOLUME III

# FEDERAL RECORDS & REVIEW REQUEST

Shawnee Instrument of Transfer Land

Prepared for congressional constituent-service and federal-records review

Shawnee, Oklahoma | Source period: 1947-2026

## Document Navigation

This page clearly identifies **VOLUME III**. Section headings use dark navy/blue text on white, and mastheads use white text on dark navy for high contrast.

VOLUME III

# FEDERAL RECORDS & REVIEW REQUEST

Shawnee Instrument of Transfer Land

Prepared for congressional constituent-service and federal-records review

Shawnee, Oklahoma | Source period: 1947-2026

**Purpose:** organize the available documentary record, identify unresolved federal-property questions, and request a parcel-by-parcel reconciliation from the appropriate federal agencies. This packet does not presume misconduct or make a legal determination.

## Purpose of This Volume

This volume converts the documentary case study into a specific, answerable federal records and agency-review request. It is designed so a congressional field representative can forward the questions to FAA and other appropriate federal custodians without adopting any allegation.

**Requested agency product: a written parcel-status reconciliation supported by copies of the controlling federal records.**

## A. Requested FAA Records

- The current Airport Property Map / Exhibit A for Shawnee Regional Airport and all historical versions available from federal files.
- All federal release, disposal, exchange, reclassification, concurrence or approval instruments affecting property conveyed under the November 20, 1947 Instrument of Transfer.
- All FAA correspondence and approvals concerning the 2011 Heart of Oklahoma Expo Center lease amendment, including the approval expressly contemplated by that lease.
- All FAA records concerning non-aeronautical classification or use of the 80-acre Independence/Kickapoo parcel and its subareas.
- All FAA records concerning the YMCA property at 700 W. Saratoga, Lions Club Park, Brown Derby, Shawnee Lube, 702 W. Independence, 1836 N. Kickapoo, Metro Mart Tract #23, the Armory/Vyve premises and other identified airport-associated non-aeronautical uses.
- All appraisal, FMV, land-value or rate-and-charge records submitted to or maintained by FAA for the identified non-aeronautical parcels.
- All records concerning revenue-use requirements applicable to lease revenue or sale proceeds from the identified property.
- All grant-assurance compliance records, land-use inventories or sponsor certifications that identify federally obligated versus released property.

## B. Other Federal Custodians

If FAA does not hold the complete conveyance and release history, congressional staff may need to request records from GSA, the National Archives, and/or the Department of the Navy or successor custodian for War Assets Administration/Naval Air Station property records.

## C. Twelve Questions for Federal Review

1. Which legal-description tracts conveyed by the November 20, 1947 Instrument remain subject to federal airport-purpose restrictions today?
2. For every tract no longer federally obligated, what release, disposal, exchange, sale approval or other federal instrument changed its status, and on what date?
3. Does FAA consider the 80-acre City-owned Independence/Kickapoo parcel, in whole or in part, federally obligated airport property today?
4. What federal status applies to the approximately 4.81-acre YMCA property at 700 W. Saratoga and to the separate Lions Club Park footprint?
5. What FAA approval was issued for the 2011 Expo lease that expressly stated it was subject to the 1947 Instrument and FAA approval?
6. What federal status and valuation requirements applied to Brown Derby, Shawnee Lube, 702 W. Independence and 1836 N. Kickapoo during their documented commercial lease periods?

7. Did any of those properties qualify for an exception to FMV requirements? If so, what exception and what documentation supported it?
8. What federal revenue-use restrictions applied to rents, sale proceeds or other consideration generated by those parcels?
9. Are Shawnee Airport Authority Fund accounts 511-46250 and 511-46260 the accounts into which federally obligated airport lease revenues were expected to be deposited during the modern period, and what predecessor accounts were used historically?
10. Does FAA have a parcel-level reconciliation tying the 1947 Instrument to the current Airport Property Map? If not, what records are necessary to create one?
11. Were any long-term extensions - including the reported Shawnee Lube extension to 2054 or YMCA extension to 2064 - reviewed or approved by FAA because of federal property obligations?
12. Does FAA identify any present compliance concern requiring corrective action, additional documentation, updated appraisal, revenue reconciliation or formal release?

## D. Priority Missing Local/Federal Records

| Priority | Record                                                 | Why it matters                                                                                    |
|----------|--------------------------------------------------------|---------------------------------------------------------------------------------------------------|
| 1        | FAA approval for 2011 Expo amendment                   | Directly referenced by executed lease; could show FAA interpretation of 1947 obligations in 2011. |
| 2        | Current + historical Airport Property Maps / Exhibit A | Best authoritative bridge between original federal tracts and current parcels.                    |
| 3        | Complete federal release/reclassification schedule     | Determines which parcels remain obligated.                                                        |
| 4        | 1964 YMCA lease + amendments                           | Needed to understand 700 W. Saratoga term, consideration and federal clauses.                     |
| 5        | 2012 Shawnee Lube extension to 2054                    | Material long-term extension referenced by 2017 Airport memo but absent from reviewed package.    |
| 6        | 2017 Brown Derby appraisal + 1988 lease                | Needed to verify valuation history and changing footprint.                                        |
| 7        | Original Heavenly Grind lease/FMV record               | Memo says original 1836 N. Kickapoo rate was based on FMV.                                        |
| 8        | Historical airport revenue ledgers/accounts            | Needed to trace rent and proceeds to airport purposes.                                            |
| 9        | County Clerk chain-of-title/recorded instruments       | Needed to distinguish fee title, leasehold, mortgages, releases and recorded transfers.           |

## E. Suggested Transmittal Language

**The constituent has assembled a substantial local documentary record concerning property conveyed to the City of Shawnee in connection with the former Shawnee Naval Air Station. The records include a 2011 lease that expressly references the 1947 Instrument of Transfer and FAA approval, and a 2022 transaction documenting FAA reclassification and FMV treatment for non-aeronautical airport property. We request FAA assistance in reconciling the original federal conveyance with current parcel status, releases/reclassifications, applicable revenue requirements and the current Airport Property Map. This request does not presume a violation; it seeks an authoritative federal record.**

VOLUME IV

EVIDENCE INDEX & PARCEL MATRIX

Shawnee Instrument of Transfer Land

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Shawnee, Oklahoma | Source period: 1947-2026

Document Navigation

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VOLUME IV

# EVIDENCE INDEX & PARCEL MATRIX

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**Purpose:** organize the available documentary record, identify unresolved federal-property questions, and request a parcel-by-parcel reconciliation from the appropriate federal agencies. This packet does not presume misconduct or make a legal determination.

## Evidence Classification

Tier 1 denotes primary records central to the federal-status question. Tier 2 denotes primary supporting/comparator records. Tier 3 denotes secondary analyses or research roadmaps that should not be used to prove parcel status or compliance.

| Tier | Evidence set                                                                                     | Role in packet                                                                                                                 |
|------|--------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------|
| 1    | 1947 Instrument; 2011 Expo; 2022 Guard; 2019/2022 policy records                                 | Core federal conveyance, modern Instrument reference, modern FAA/FM <sup>■</sup> V control transaction, and revenue framework. |
| 1    | Brown Derby; Shawnee Lube; YMCA/Lions Club; 80-acre assessor/surveys                             | Core parcel/use tests requiring federal reconciliation.                                                                        |
| 2    | 1836 N. Kickapoo; 702 W. Independence; Metro Mart; Vyve; aeronautical comparators; North Airport | Supporting lease, valuation, governance and comparison evidence.                                                               |
| 3    | Holistic Analysis / Shawnee DOGE summaries                                                       | Research roadmaps only; some conclusions exceed what primary records presently prove.                                          |

## Master Parcel / Transaction Matrix

| Parcel / use         | Classification in record        | Consideration / rate evidence                                               | Federal evidence in record                                      | Status for congressional review                                 |
|----------------------|---------------------------------|-----------------------------------------------------------------------------|-----------------------------------------------------------------|-----------------------------------------------------------------|
| Expo / 90.53 ac      | Civic/Expo; former airport land | 2011 lease \$1/year + duties                                                | Lease expressly subject to 1947 Instrument and FAA approval     | FAA approval and full release/status history needed.            |
| Guard / 40 ac        | Commercial non-aeronautical     | SAA->City \$174,240/year; City->OMD nominal                                 | FAA authorized non-aeronautical use; FMV by appraisal described | Control transaction; obtain FAA authorization/appraisal file.   |
| Brown Derby          | Commercial non-aeronautical     | 23,400 SF; \$3,792/year; 2017 \$0.16/SF                                     | FAA/subordination language in lease; appraisal referenced       | Obtain appraisal, 1988 footprint and federal parcel status.     |
| Shawnee Lube         | Non-aviation commercial         | 0.71 ac after 2017; \$7,414/year amendment                                  | FAA rules/subordination in 2004 lease                           | Obtain 2012 extension to 2054 and federal review.               |
| 1836 N Kickapoo      | Commercial coffee shop          | 8,462 SF; \$1,620/year                                                      | Memo says original rate based on FMV + CPI                      | Obtain original FMV record and federal status.                  |
| 702 W Independence   | Commercial retail/recreation    | 7,200 SF building + 35,305 SF land; \$12,000/year                           | FAA rules/subordination in original lease                       | Obtain FMV basis and federal classification.                    |
| YMCA 700 W Saratoga  | Community/institutional         | 2014 memorandum references \$5,000 consideration; underlying lease controls | Airport Authority renewal; 1964 origin                          | Obtain 1964 lease and federal parcel match.                     |
| Lions Club Park      | Community/recreation            | 2013 \$1/year + maintenance; City utilities/major costs                     | Federal status not established by current primary record        | Map footprint against 1947/current FAA property maps.           |
| Metro Mart Tract #23 | Commercial airport leasehold    | 2.48 acres; rent not in reviewed package                                    | Airport tract; recorded lease addendum lead                     | Obtain 2008 lease/FMV and federal tract history.                |
| Vyve / Armory        | Commercial call center          | 2017 \$775/month                                                            | Airport Authority lease; federal parcel status unresolved       | Obtain 2015 original lease and Armory title/federal history.    |
| North Airport / SEDF | Industrial/economic development | 1999 master lease \$50/year; later sublease revenues                        | Federal connection not established                              | Keep separate until acquisition/title research resolves status. |

## Chronology - Selected Milestones

| Year    | Documented milestone                                                                                       |
|---------|------------------------------------------------------------------------------------------------------------|
| 1947    | Instrument of Transfer recorded; former Naval Air Station property conveyed with federal covenants.        |
| 1964    | Underlying YMCA lease dates to February 19, 1964, according to 2014 memorandum.                            |
| 1979    | City memo says 24.496 acres of former airport land transferred to SCCDA.                                   |
| 1986    | SCCDA transfers same 24.496 acres to Shawnee Municipal Authority for financing.                            |
| 1988    | Additional Expo leases; Brown Derby predecessor lease history also reaches 1988.                           |
| 1999    | North Airport Property master lease to SEDF.                                                               |
| 2004    | Shawnee Lube commercial airport lease begins.                                                              |
| 2009    | 702 W. Independence commercial lease begins.                                                               |
| 2011    | Expo consolidation; lease expressly references 1947 Instrument and FAA approval.                           |
| 2013    | 1836 N. Kickapoo FMV/CPI coffee-shop leasing; YMCA receives Lions Club agreement.                          |
| 2014    | YMCA 4.81-acre memorandum extends underlying lease to 2064.                                                |
| 2017    | Brown Derby appraisal/rate reset; Shawnee Lube expansion.                                                  |
| 2019    | Airport Facilities Lease and Development Policy formalizes valuation/rate practices.                       |
| 2021    | Brown Derby amendment; SAA authorizes work with FAA on Guard reclassification.                             |
| 2022    | FAA-authorized Guard non-aeronautical transaction; FMV \$174,240/year; rental revenue accounts identified. |
| 2025-26 | Records research and parcel-reconciliation effort continues.                                               |

## Document Handling Rules

Use primary documents for factual assertions; label secondary analyses as research history; do not infer a federal violation from nominal rent alone; do not infer a release or sale from occupancy or assessor shorthand; preserve documentary discrepancies; mark unresolved parcels as “federal status to be verified”; and ask the federal agencies to supply the authoritative reconciliation rather than asking congressional staff to make a legal conclusion.