Shawnee Hospital Authority

Public trust governance, hospital ownership and financing, and the origins of Avedis Foundation

The City of Shawnee accepted the beneficial interest in a public hospital trust in 1966. The trust's trustees held title to the trust estate under the original indenture. The City's beneficiary status, ownership of specific hospital assets, authority to issue debt, and entitlement to proceeds from the 2012 hospital sale are separate questions. Each turns on a different set of records. [1, 2, 4, 5]

The 1966 indenture names James D. Loudon, M.D., as trustor and establishes the Shawnee Hospital Authority (SHA) for hospital and related public purposes. Avedis reports that SHA conveyed hospital assets to MidAmerica HealthCare in 1989, continued to serve as a financing issuer, and that Community Health Partners later sold substantially all Unity Health Center hospital assets to SSM in 2012. SSM confirms the hospital joined its system effective July 1, 2012. The 1989 deed and the 2012 purchase agreement were outside the records obtained for this review. [1, 4, 7]

Key figure or event	What the record supports
$4.5 million | 2002	The minutes index records a maximum authorization for a negotiated tax-exempt Unity project revenue note. Actual issuance, the amount drawn, and repayment require the executed financing and trustee records. [3, 5]
Approximately $100 million | 2012	Contemporary reporting described Avedis as having about $100 million in assets. Its first CEO said Community Health Partners retained its investments. The trade press reported that the purchase price was undisclosed. [8, 9]
October 2025 complaint	The City's referral and the District Attorney's investigation were reported publicly in May 2026. This review located no public disposition, charging decision, or completed SHA forensic audit as of November 8, 2026. [12, 13]

What would resolve the central question

Match the 1989 transfer schedule and recorded deeds to the 2012 asset purchase and closing schedules, then reconcile the cash, retained investments, and assumed debt to the nonprofit's audited opening balances. That is the documentary test for which entity held each asset and who received each form of consideration. [4, 8, 9, 11]

Scope and evidence

This review cross-references the uploaded indenture, the May 28 research memo, the Shawnee Minutes CSV, earlier chats, the October records-request snapshots, and public sources. The research memo and chats helped identify leads. The CSV contains research summaries and may repeat one event across minutes and livestream rows. Citations identify when a finding relies on the index, an organizational account, or reporting. [1–6, 14, 16]

Trust and hospital chronology

Date	Event and evidentiary basis
Jan. 3, 1966	The signed indenture and City acceptance identify the City as beneficiary. Article VI initially provides for eight trustees and describes trustee elections and vacancies. Articles V and VII describe the trust estate and trustee title, powers and control. [1, pp. 1–4, 9, 13]
Nov. 22, 1976	The City's 2025 advisory-board guide cites an amendment on this date. The amendment itself was unavailable for this review, so the exact changes remain to be confirmed. [2]
1989–1992	Avedis dates the transfer of hospital real estate and other conveyed assets to MidAmerica HealthCare, Inc. to 1989, and the change from Shawnee Medical Center to Shawnee Regional Hospital to 1992. Avedis says SHA continued as issuer and that MidAmerica was responsible for repayment. Catholic Health World reported that SSM leased and helped manage a predecessor before Unity formed. The specific lease terms remain unverified. [9] This history is the organization's account of the transaction. [4]
2002–2004	Avedis dates the combination of Shawnee Regional and Mission Hill Memorial hospitals under Community Health Partners to 2002. The index records Resolution 6160 on Dec. 16, 2002 (Item 11), a proposed certificate-of-need ordinance tabled June 2, 2003, and four SHA reappointments on Nov. 15, 2004, including Charles Skillings and John Robinson. [3, IDs 3011, 3327, 4455; 4]
Nov. 17, 2008	The index records approval of a planned unit development and preliminary and final Unity Health Center plats with conditions. The planning approvals document a land-use decision. Title requires the recorded deeds. [3, ID 34202; 5]
Apr. 2 & 16, 2012	The index attributes to City Attorney Marianne Kern an April 2 briefing that the City had no ownership interest in Unity and would receive no sale proceeds. It also records that outside counsel reportedly reviewed prior transfers and approvals. The underlying opinion was unavailable. The April 16 entry records a later discussion of trust status. [3, IDs 14922, 34822, 34865; 5]
June–July 2012	SSM acquired Unity's hospital assets and reports that the former Unity joined the system July 1. An FCC notice records a separate license assignment from Community Health Partners, Inc., d/b/a Unity Health Center, to St. Anthony Shawnee Hospital, Inc. June reporting also identifies a separate Shawnee Medical Center Clinic purchase. [4, 7–10]
Oct.–Nov. 2012	The index shows the Shawnee Medical Center final plat was deferred Oct. 15 and approved Nov. 19 as a replat to correct a prior recorded plat error. A parcel title history still requires the recorded plat and deed chain. [3, IDs 35269, 35343; 5]

Beneficiary rights. Article VIII limits the City's claim to the trust estate during operation. Article IX directs distribution of the remaining trust estate to the City after debts, expenses, and obligations are paid on termination. This applies to the residue of the trust estate. The 2012 sale's effect on that estate requires the transaction records and the operative indenture. [1, p. 10; 15]

What the dollars represent

Financing authority and liability

The original indenture provides that debt issued by the trustees is payable solely from the trust estate and calls for project instruments to identify the specific pledged property. The December 2002 index entry records a City approval for SHA to issue the Series 2002 Unity Health Center Project revenue note on a negotiated basis without competitive bidding. The indexed vote was unanimous. The authorization alone cannot establish a closing, a City guarantee, the terms of security or any legal deficiency in the negotiated procedure. The signed resolution, note, loan and security documents would answer those questions. [1, pp. 4–5; 3, ID 3011; 15]

The 2012 asset sale and charitable endowment

Avedis says SSM assumed certain liabilities, including outstanding bonds, and that sale proceeds were preserved in a charitable endowment. Its account identifies a corporate name change from Community Health Partners to Avedis. Contemporary reporting quotes the first CEO describing retained investments and a $35 million pledge for hospital expansion. A pledge records a commitment. Payment dates, conditions, and the amount ultimately disbursed require the grant agreement and payment records. The FCC assignment independently corroborates the operating names in the transition. [4, 8–10]

Reporting date	Reported figure	What it measures
FY ended June 2012	$94,029,113	Net assets, Form 990 data for EIN 73-1347360.
FY ended June 2013	$99,990,301	Net assets, Form 990 data for the same EIN.
FY ended June 2025	$106,642,124	End-of-year net assets. Form 990-PF data also show $4,064,356 in revenue and $4,757,714 in charitable disbursements.

The tax figures come from ProPublica’s extracts of IRS filings. They measure reported financial position and activity at the nonprofit. A closing reconciliation requires gross consideration, assumed liabilities, adjustments, retained assets, and proceeds separately. A contemporaneous Foundation Center filing also associates the same EIN with Community Health Partners, consistent with corporate continuity. [4, 11]

Hospital benefits and community grants

Avedis identifies SSM’s West Tower dedication in 2016, a 2018 mammography grant, and a 2021 Comprehensive Breast Center grant. It also lists grants for Shawnee’s municipal pool and trails. These are foundation-reported examples of community and hospital investment. Whether any grant was required by the transaction, or paid on specified terms, depends on the underlying agreement. [4, 8]

Appointments, records and review

Trustee appointment authority

The City’s guide, updated September 30, 2025, describes ten seats, six-year terms, mayoral appointments confirmed by the Commission, and an annual September meeting at Avedis. It contains an internal discrepancy. The heading says there are no vacancies, but the roster lists a vacant seat. The guide is a dated snapshot, and the original indenture uses a different selection structure. The executed 1976 amendment, any later amendments and appointment instruments are necessary to reconcile the two. [1, p. 4; 2, 14]

Record	Finding
Dated SHA roster	Listed to 9/30/2025: Josh Trimble and a vacant seat. To 12/31/2027: Mark Finley, Kathy Laster, Stephen Trotter. To 9/30/2028: John Robinson, Jill Spencer, Ron Sharp. To 9/30/2029: Tina Hanna, Angi Mohr. These are the guide’s printed term dates. [2]
Documented overlap	The Avedis board page lists Trimble, Finley, Spencer and Mohr, and identifies Mohr with SSM St. Anthony Hospital - Shawnee. Avedis history records Laster becoming CEO in 2018 and the FY2025 filing lists her as president/CEO. Conflict analysis requires a specific transaction, a relevant interest, and records of disclosure, recusal and voting. [2, 4, 11]
Oct. 17, 2016	The index records Commissioner Lesa Shaw questioning the standard application process. The livestream-index row says the motion to table failed for lack of a second. The separate reappointment vote was 5–1. The earlier research memo conflated those actions in one section. [3, IDs 5000, 27911, 27942, 27944; 5, 6]
2020 and 2022	The index records a Dec. 7, 2020 SSM healthcare-worker proclamation and a March 7, 2022 consent-agenda acknowledgment of SHA resignations. Each is a distinct municipal action. [3, IDs 6384, 6905; 5]
Request 26-699	Filed Oct. 14, 2026 for trustee appointments, terms, confirmation and governing records from Jan. 1, 2017 to Oct. 14, 2026. It was marked open in the October 22 local-time snapshot. Its current status and any subsequent production were unverified. [14]

Whistleblower referral and proposed forensic audit

KFOR and KOCO reported that the City received a complaint on October 5, 2025 alleging historical financial misconduct relating to SHA and that the District Attorney opened an investigation. The City said it was cooperating. Secondary accounts of the July 20, 2026 Commission meeting report discussion of a proposed resolution supporting the investigation and seeking a forensic audit, with no action taken on the item. The adopted minutes and any later action should be checked before drawing a conclusion about audit authorization. The complaint’s factual allegations and any findings remain unverified in the records reviewed. [12, 13]

Records and legal framework

The original indenture's Article VI(3) requires trustee minutes and accurate financial records, with public access. Oklahoma Title 60, including §§ 176, 178, 178.13, 180 and 180.1, provides the public-trust framework for governance, financing, termination and financial reviews. Section 180.1 includes financial thresholds, outstanding-debt triggers, and qualifications for alternative procedures or exemptions. The Open Meeting and Open Records Acts provide separate frameworks for meeting procedure and access to existing records. For a historical compliance finding, identify the law and operative trust text in effect on the date of the specific action. [1, 15]

Priority and likely custodian	Records and question answered
1 | City Clerk, SHA and county land records	Certified original, 1976 and later amendments, City acceptance and approved minutes, recorded deeds, parcel descriptions, leases and releases. Identify the operative trustee rules and trace each parcel and retained interest.
2 | SHA, City, lender, trustee bank or bond counsel	Signed Resolution 6160, SHA authorizing action, final note and loan agreement, closing transcript, pledged collateral, expenditures, debt-service history, and any assumption, defeasance or release. Determine what closed and what was outstanding in 2012.
3 | City records, CHP/Avedis and SSM	1989 agreement and closing schedules, 2012 purchase agreement and closing statement, conveyance and assumption exhibits, nonprofit name-change filings, audited financial statements and opening endowment schedules, and nonprivileged records of the City's review. Reconcile title, consideration and proceeds.
4 | SHA, City and State Auditor & Inspector	SHA financial statements, audit or agreed-upon-procedures reports, filing receipts, underlying revenue, asset and debt records, and any later forensic-audit resolution or engagement. Determine which reporting rules applied and whether reports were filed.
5 | City, SHA and District Attorney	Complete the 26-699 appointment record with the signed instruments, dated rosters, published agendas and approved minutes. Seek any releasable referral or disposition record and any public July 20 resolution record.

Assessment

The signed instrument establishes a public trust and identifies Shawnee's interest as beneficiary. The public history and contemporary reporting connect Unity's asset sale to the Avedis endowment. The transfer and closing instruments are the critical missing link between those facts. The available materials support document-by-document verification of title, debt and proceeds. They do not support a finding that the City was owed a particular sum or that a named trustee committed misconduct.

Documents and public sources

Numbered references match the citations throughout the summary.

[1] Shawnee Hospital Authority Trust Indenture, Jan. 3, 1966, supplied signed 13-page scan. Arts. I–III, V–IX and City acceptance on p. 13.

[2] City of Shawnee, City Advisory Boards Website Information, updated Sept. 30, 2025, Shawnee Hospital Authority entry.

[3] Supplied **Shawnee Minutes Research CSV**, Aug. 28, 2026 filename. Locate entries using the ID column and meeting date, since the dataset covers later years as well. See the Shawnee Minutes project index.

[4] Avedis Foundation, organizational history and published board roster.

[5] City recording locators supplied by the CSV. Apr. 2, 2012 (1:11:34–1:22:50), Oct. 17, 2016, Nov. 17, 2008, Apr. 16, 2012, Oct. 15, 2012, Nov. 19, 2012, Dec. 7, 2020, and Mar. 7, 2022. These are research locators. Full playback and signed historical minutes were unavailable for independent verification.

[6] Supplied **Shawnee Hospital Authority Research**, May 28, 2026, pp. 1–14. Prior research and issue-spotting memo.

[7] SSM Health, St. Anthony Shawnee Hospital community health needs assessment, Executive Summary.

[8] David Page, The Journal Record, July 3, 2012 reporting on Avedis. Scott Carter, June 15, 2012 reporting on the separate clinic acquisition.

[9] Catholic Health World, June 1, 2012 acquisition reporting.

[10] Federal Communications Commission, July 2012 public notice, Community Health Partners / St. Anthony Shawnee Hospital license assignment, p. 7, call sign WPVT760.

[11] ProPublica Nonprofit Explorer, IRS return extracts for EIN 73-1347360 and FY2025 Form 990-PF. Foundation Center, 2013 filing identifying CHP under that EIN.

[12] KFOR, May 28–29, 2026 reporting and KOCO, May 28, 2026 reporting.

[13] MyTown, July 20, 2026 meeting summary and Citizen Portal meeting coverage. Secondary accounts. City recording locator.

[14] City of Shawnee NextRequest, **Request 26-699**, submission and later October 2026 portal snapshots. The request is unpublished.

[15] Oklahoma Legislature, Title 60 public-trust provisions. Oklahoma Department of Libraries, Open Meeting Act and Open Records Act.

[16] Earlier project discussions on the April 2012 City briefing, May–June 2026 hospital research, and October 2026 nonprofit mapping and request tracking. Used as leads.