

**OFFICE OF INTERNAL AUDIT AND ETHICS**  
**Ethics Investigation Report**  
**February 10, 2025**

**Complaint Number:** 2024-2-132  
**Date Filed:** February 16, 2024  
**Complainant:** Confidential  
**Respondent:** George Mitchell Littlejohn

**I. ALLEGATION**

The above-named respondent, George Mitchell Littlejohn a former member of the Tribal Alcoholic Beverage Control Commission (TABCC), violated Cherokee Code Section 117-45 Standards of Ethical Conduct when he misused his TABCC credit card to make personal purchases. The events that led up to this allegation were:

- During the reconciliation of credit card statements, transactions were identified on Mr. Littlejohn's TABCC credit card that appeared personal in nature.
- Following a review of these transactions the TABCC chairwoman met with Mr. Littlejohn on February 15, 2024, where he was informed of the transactions on his TABCC credit card.
- On February 16, 2024, Mr. Littlejohn requested a meeting with ethics staff to explain the credit card transactions. On the same day, he submitted a receipt indicating he reimbursed the TABCC \$2,077.04 for personal credit card transactions that were improperly made on his TABCC credit card.

**II. RELEVANT CHEROKEE CODE SECTIONS <sup>1</sup>**

**Section 117-45.1(a) Definitions**

“(1) *Tribal officials*. Any person who is:

- a. A Tribal officer as defined in Section 1 of the Charter and Governing Document;”
- b. A member of Cherokee School Board as defined in C.C Section 115-8;”
- c. Serving as a member of an authority, board, committee, or commission, appointed by Tribal Council, the Executive Committee or Principal Chief, and who is subject to removal by the appointing authority;”
- d. Appointed by Tribal Council or the Executive Committee or Principal Chief, and who is subject to removal by the appointing authority, to carry out

---

<sup>1</sup> Cherokee Code Section 117-45 Standards of Ethical Conduct (Ordinance 368(2022)).

actions, provide guidance, or assistance to the Tribal Council, the Executive Committee or to a member of the Executive Committee.”

**Section 117-45.3(d) Code of Ethics**

- “(1) Tribal officials of the EBCI shall treat service to the EBCI as a sacred public trust with fiduciary responsibility to the EBCI, which requires upholding and acting in accordance with the laws of the EBCI and engaging in the proper governance of the EBCI in a manner, which is placed above personal and private gain.”
- “(2) Tribal officials of the EBCI shall not allow financial interests to conflict with the conscientious performance of obligations inherent in fulfilling the duties and responsibilities associated with their respective offices.”
- “(3) Tribal officials of the EBCI shall protect and conserve Tribal resources and ensure the appropriate use of Tribal resources falling under the scope of the office of the Tribal official.”
- “(5) Tribal officials of the EBCI shall not use prestige of the office to advance personal interests of others or themselves.”
- “(6) Tribal officials of the EBCI shall disclose instances when they believe there has been fraud, waste, abuse, corruption, or violations of this chapter to the Office of Internal Audit and Ethics.
- “(8) Tribal officials of the EBCI shall abide by the laws of any sovereign jurisdiction in which they are present. Tribal officials of the EBCI shall disclose any misdemeanor or felony charges and/or convictions that occur in any jurisdiction while in office to the Office of Internal Audit.”
- “(13) No Tribal official of the EBCI shall take any official action or participate in a decision with respect to a matter if it will have a direct and predictable effect on the financial interest, personal interest, or present a conflict of interest for the official or employee or his or her immediate family member. Any official in such situation shall recuse himself or herself from participating in a discussion and/or vote on the matter giving rise to such conflict.
- “(15) Tribal officials shall maintain or enhance the honesty and integrity of their respective offices; and safeguard the reputation of the EBCI as a whole.”

**III. INVESTIGATION PROCESS**

The initial complaint was received on February 16, 2024. The complainant provided credit card statements showing transactions that occurred between July 18, 2023,

and January 21, 2024. The complainant also provided the criminal complaints filed with the Cherokee Court.

The complaint was determined to be complete and within the Office of Internal Audit and Ethics jurisdiction. On February 26, 2024, a letter was sent to the complainant explaining that further action on the complaint was being deferred until legal proceedings related to the allegations were resolved.

On November 7, 2024, the Cherokee Court issued a final decision. A copy of the complaint was sent to the respondent George Mitchell Littlejohn on November 25, 2024. The deadline for Mr. Littlejohn to submit a written response was December 20, 2024, but no response was received. The letter containing the complaint sent to Mr. Littlejohn was returned to the Office of Internal Audit and Ethics on January 14, 2025, marked as "not deliverable as addressed".

The Ethics Review Committee reviewed the complaint in a quarterly meeting, on January 14, 2025. The Committee approved for the ethics staff to proceed with an investigation. (See Resolution ERC 25-02)

Mr. Littlejohn was sent a letter on January 17, 2025, informing him of the Ethics Review Committee's decision to investigate the complaint. On January 30, 2025, a phone call was made to Mr. Littlejohn to confirm his awareness of the upcoming investigation. The call went unanswered, prompting a message to be left.

Ethics staff reviewed credit card statements, TABCC policy, criminal charges against Mr. Littlejohn and his plea agreement.

#### **IV. FINDINGS OF FACT**

1. The respondent was a Tribal official as defined in Cherokee Code Section 117-45.1.(c) at the time of the incident.
2. The respondent is an enrolled member of the EBCI.
3. The complainant is an enrolled member of the EBCI.
4. The respondent served as a Tribal Alcoholic Beverage Control Commissioner from August 2018-March 2024.
5. The respondent was in possession of the TABCC credit card used to make purchases, between July 18, 2023 and January 21, 2024.
6. The respondent was removed as a Commissioner on March 21, 2024, by resolution 134(2024).

#### **V. ANALYSIS**

The complaint alleges the respondent violated 8 sections of Cherokee Code Section 117-45.3(d). An analysis is outlined below.

***It is alleged that the respondent failed to treat service to the EBCI as a sacred public trust with fiduciary responsibility to the EBCI, which requires upholding and acting in accordance with the laws of the EBCI and engaging in the proper governance of the EBCI in a manner, which is placed above personal and private gain. (Section 117-45.3(d)(1))***

Violation. There is sufficient evidence to substantiate that Mr. Littlejohn's actions violated 117-45.3(d)(1).

Mr. Littlejohn's misuse of his TABCC credit card for personal purchases constitutes a violation of his fiduciary responsibilities as a Tribal official. This action demonstrates a disregard for proper governance of the EBCI, prioritizing personal interests over the needs of the EBCI.

***It is alleged that the respondent allowed financial interests to conflict with the conscientious performance of obligations inherent in fulfilling the duties and responsibilities associated with their respective office. (Section 117-45.3(d)(2))***

Violation. There is sufficient evidence to substantiate that Mr. Littlejohn's actions violated 117-45.3(d)(2).

On November 1, 2022, Mr. Littlejohn signed a credit card policy that explicitly prohibited the use of the TABCC credit card for personal or private use. The credit card policy states that the signatory acknowledges reading and understanding the rules for appropriate use of the TABCC credit card. Mr. Littlejohn's actions reflect a disregard for these responsibilities, constituting a violation of both the credit card policy and his fiduciary duty as a Tribal official.

***It is alleged that the respondent failed to protect, conserve, and/or ensure the appropriate use of Tribal Resources. (Section 117-45.3(d)(3))***

Violation. There is sufficient evidence to substantiate that Mr. Littlejohn's actions violated 117-45.3(d)(3).

As defined in the Standards of Ethical Conduct, a Tribal resource includes "funds and other financial assets." Mr. Littlejohn misused a Tribal resource by making personal purchases using the TABCC credit card.

***It is alleged that the respondent used the prestige of the office to advance personal interests of others or themselves. (Section 117-45.3(d)(5))***

Violation. There is sufficient evidence to substantiate that Mr. Littlejohn's actions violated 117-45.3(d)(5).

Mr. Littlejohn leveraged his authority and the prestige of his office to advance his personal interests by misusing the TABCC credit card.

***It is alleged that the respondent failed to disclose instances when they believe there has been fraud, waste, abuse, corruption, or violations of this chapter to the Office of Internal Audit and Ethics. (Section 117-45.3(d)(6))***

Dismissed. There is not sufficient evidence to support this allegation.

***It is alleged that the respondent failed to abide by the laws of a sovereign jurisdiction in which they were present. (and/or) they failed to disclose any misdemeanor or felony charges and/or convictions that occur in any jurisdiction while in office to the Office of Internal Audit. (Section 117-45.3(d)(8))***

Violation. There is sufficient evidence to substantiate that Mr. Littlejohn's actions violated 117-45.3(d)(8).

Mr. Littlejohn was charged with 11 counts of criminal activity as a result of his alleged misuse of the TABCC credit card. Mr. Littlejohn plead guilty to one charge of misusing Tribal money or property. All other charges were dismissed.

***It is alleged that the respondent participated in a decision that had a direct and predictable effect on the financial interest, personal interest, or presented a conflict of interest for the official or their immediate family. (Section 117-45.3(d)(13))***

Dismissed. There is not sufficient evidence to support this allegation.

***It is alleged that the respondent failed to maintain or enhance the honesty and integrity of his respective office; and safeguard the reputation of the EBCI as a whole. (Section 117-45.3(d)(15))***

Violation. There is sufficient evidence to substantiate that Mr. Littlejohn's actions violated 117-45.3(d)(15).

By using the TABCC credit card to make personal purchases despite having explicitly committed in writing not to do so, Mr. Littlejohn has betrayed the trust placed in him and undermined the integrity required to fulfill the responsibilities of his office. Mr. Littlejohn's breach of the signed policy not only compromises his own credibility, but also has the potential to tarnish the reputation of the TABCC and the EBCI.

**VI. CONCLUSION AND RECOMMENDATION**

The committee finds that there are Ethics Code Violations of Sections 117-45.3(d)(1), 117-45.3(d)(2), 117-45.3(d)(3), 117-45.3(d)(5) 117-45.3(d)(8), and 117-45.3(d)(15), for the reasons set forth in the report. The Audit and Ethics Committee will assess a fine and further action if needed. This report will also be forwarded to the Attorney General, the Executive Office, and Tribal Council.

Report prepared and submitted by:

Joshua Parku  
Case Manager/Lead Investigator

02/10/2025  
Date

**VII. REVIEW BY ETHICS REVIEW COMMITTEE**

- Affirm ethics violation determination
  - Issue this report to complainant and respondent as final decision
  - Issue revised report to complainant and respondent as final decision
- Deny ethics violation determination
  - Request further investigation prior to further decision by the committee
  - Request hearing prior to further decision by the committee

**VIII. RECOMMENDED VIOLATION CONSEQUENCES BY THE ETHICS REVIEW COMMITTEE**

Issue a fine in the amount of \$5,000 and recommend George M. Littlejohn be ineligible to serve in any appointed position indefinitely.

I hereby certify that the above decision was approved by a majority of voting members of the Ethics Review Committee.

Joshua Parku  
Ethics Review Committee Chair

02/18/2025  
Date

**IX. FINAL DECISION BY AUDIT AND ETHICS COMMITTEE**

- Affirm decision and recommendation of the Ethics Review Committee as final
- Request further investigation prior to decision
- Overturn decision and recommendation of the Ethics Review Committee in part as described below
- Overturn decision and recommendation of the Ethics Review Committee and dismiss the complaint in its entirety
- Other as described below

**I hereby certify that the above decision was approved by a majority of voting members of the Audit and Ethics Committee.**

Lou Lambert  
**Audit and Ethics Committee Chair**

3/4/2025  
**Date**