

From: [Hannah Secka](#)
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Cc: [tjjoye@fcso.org](#)
Subject: Perjury Charges
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Board of Trustees
Porter Stewart, Esq. (Chairman)
Richard O'Malley, Superintendent
Brian Denny, Director of Special Education
Matthew Dowdell, Principal

Dear Florence School District One,

YOU ARE HEREBY placed on notice...

Pursuant to:

SECTION 16-9-10.Perjury and subornation of perjury.

(A)(1) It is unlawful for a person to wilfully give false, misleading, or incomplete testimony under oath in any court of record, judicial, administrative, or regulatory proceeding in this State.

(2) It is unlawful for a person to wilfully give false, misleading, or incomplete information on a document, record, report, or form required by the laws of this State.

(B)(1) A person who violates the provisions of subsection (A)(1) is guilty of a felony and, upon conviction, must be fined in the discretion of the court or imprisoned not more than five years, or both.

Felony

Giving false testimony in court, or falsely swearing before someone authorized to administer oaths. The penalty is up to five (5) years in prison and a fine at the court's discretion.

In South Carolina, perjury is a crime that involves giving false or misleading testimony under oath, or providing false information in a required document:

Hannah Secka and (MYNS) allege:

Brian Denny, Director of Special Education committed perjury while under oath on April 10, 2019 in an IDEA Due Process Hearing by giving false and misleading testimony regarding the religious discrimination and assault Kathy Luhrs engaged in on May 29, 2018 against my son. This crime and evidence was revealed in a SCDE Facilitated IEP Meeting with Bruce Smith, school nurse, assistant principal, occupational therapist, speech pathologist, and the resource

teachers(all witnesses) on May 30, 2018. Where Kathy Luhrs admitted to the crime. Parent met with Richard O'Malley on December 3, 2018 where he made copies of the evidence of the assault and told the parent "she's gone!" The DISTRICT failed their duty of care to protect my son (MYNS) pursuant to the Safe School Climate Act 59-63-110 as well as state board standards of conduct pursuant to regulation 43-58 and intentionally refused to follow local, state, federal policies and procedures for teacher misconduct, immorality, racism, religious discrimination and assault to avoid liability. Their lawyers attempted to tamper with witness Daisy Johnson testimony. When she testified truthfully regarding several assaults she witnessed as well as staff misconduct, then they transferred her and took away from my son as his aide as retaliation.

Richard O'Malley, Superintendent committed perjury in his deposition on September 6, 2023 by intentionally giving false misleading testimony by stating Greg Hall would have handled the assault when Greg Hall or the position did not exist in 2018 or 2019. He further gave willful false testimony about not facilitating a December 3, 2018 meeting with the parent. Richard O'Malley gave further false testimony about the hazing stating that Matthew Dowdell responsibility as the principal. Richard O'Malley paid a \$64,000 bribe to Doug Dent, Hearing Officer for favorable IDEA decisions that took place on April 10, 2019. He gave false testimony about the FCSO Reports for Assault & Battery 3rd Degree. He willfully and falsely testified the district didn't have a hazing policy and that he gave sworn testimony in the IDEA Due Process Hearing for my son.

Mathew Dowdell, Principal of WFHS willfully gave false, misleading, and incomplete testimony under oath in the IDEA judicial record on April 10-11, 2019 in the State of South Carolina.

All my actions against FSD1 fall well within the scope of the SC Parents Bill of Rights, IDEA, Section 504, ADA to advocate and protect my special needs child from harm. Pursuant to Section 8-13-705 (A) (1-3) "giving anything of value for testimony for a witness" "*influence public officials to commit, collude in, or allow fraud on a governmental entity*" constitutes a violation of the ethics codes. The Board of Trustees are guilty of malfeasance in office and litigation is forthcoming!

Hannah L. Secka

Sent from my iPhone