

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM SPARTANBURG COUNTY  
Court of Common Pleas

R. Keith Kelly, Circuit Judge

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Appellate Case Number 2016-000232

Civil Action Number 2014-CP-42-1759

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SEP 26 2016

SC Court of Appeals

Denise Parker ..... Respondent,

v.

The National Honorary Beta Club ..... Appellant.

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Respondent's Supplement to Record

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Index

**Trial Testimony**

Denise Parker .....606

Bob Bright .....607

Laura Lewis .....608

**Plaintiff's/Respondent's Exhibits**

Plaintiff Exhibit 6 (complete) ..... 609

1 you understand it?

2 A. It's what the Board of Internal Affairs told me that I  
3 would not be fired if I answered their questions, that Bob  
4 Bright could not fire me.

5 Q. Okay. And I think you said you don't understand what  
6 the term fraudulent act, is that correct?

7 A. No, sir.

8 Q. Let's go back then and just -- what were the reasons  
9 Mr. Bright gave you when he fired you? What were the two  
10 reasons you talked about?

11 A. It was negativity and failure to answer e-mails.

12 Q. Okay. Were you negative with the board?

13 A. No, sir.

14 Q. Did anybody from the board say that you were negative  
15 with them?

16 A. Not to my knowledge, no, sir.

17 Q. Well, did they say it to you?

18 A. No, sir.

19 Q. Did you answer your e-mails?

20 A. Yes, sir.

21 Q. And, again, did Mr. Bright ever provide you any e-mail  
22 example, or anything, to show that someone at the Beta Club  
23 e-mailed you something and you didn't respond?

24 A. No, sir.

25 Q. All right. Denise, we are going to talk about damages.

1 Q. And how did you go about that process?

2 A. That process simply is to request of the board, the  
3 national board for those positions and which those positions  
4 were granted, approved in our budget. We began to seek out  
5 very, very strong individuals within that. And the two  
6 individuals that you saw, Mr. Richie Garland, who is a  
7 teacher here from Chesnee; and Ms. Meyer, who was a teacher  
8 from Texas were the two individuals selected for that  
9 particular position. And as they explained to you, they are  
10 very, very connected, like myself was, in the organization  
11 and working with kids and understood, and they were  
12 teachers, teachers who knew what teachers were like and knew  
13 how to work with kids. So I wanted to make sure for us to  
14 stay student focused, that we had teachers that does fit the  
15 role.

16 The same thing with the COO. The COO is a former  
17 administrator, former principal.

18 Q. Let me hand you what's been admitted into evidence as  
19 Defendant's Exhibit No. 9. Do you recognize that?

20 A. Yes, sir, this is our organizational chart as of 2013.

21 Q. And is this chart a reflection of what you have in  
22 front of you?

23 A. Yes, sir.

24 Q. Does this chart reflect the additions and changes that  
25 you just talked about?

1 A. I -- what I said was if -- I could have told you two  
2 hours ago," meaning she said she could have told us two  
3 hours ago how to fix that is about what I remember.

4 Q. Denise Parker?

5 A. That's my best recollection, yes.

6 Q. And who else was in the print shop at that time?

7 A. At that time Ms. Lanie Curry was in there.

8 Q. I'll hand you your deposition. Please go to page 35.

9 A. Okay.

10 Q. Do you recall that I took your deposition just about a  
11 month ago, correct?

12 A. It was -- not quite a month ago, but, yes.

13 Q. Not quite a month ago and you understood that you were  
14 under oath?

15 A. Yes, I did.

16 Q. Let's go to -- I'm going to read the question and  
17 answer between us beginning on line 25.

18 A. Okay.

19 Q. "Q. But you can't swear that it was Denise who said we  
20 could have helped you if you would have told us that two  
21 hours ago?

22 "A. Right, I don't remember which one of them said it.  
23 They were just both there."

24 Was that your sworn testimony then --

25 A. That was.

# The Constitution of The National Beta Club

## Preamble

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Believing that exemplary student effort and achievement should be encouraged and rewarded, and seeking to cultivate the ideals of service and leadership in our citizens of tomorrow, the governing body of the National Honorary Beta Club has instituted this organization for the promotion of these ideals and those stated in the Beta Creed; among elementary and secondary school students. To implement this purpose the following articles have been adopted.

## Article I - Name

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The name of this organization shall be The National Honorary Beta Club. The name of each individual chapter of the organization shall be designated by the name of the school at which it is located.

## Article II - Purpose

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The purpose of this organization shall be to promote the ideals of honesty, service, morality, ethical conduct, and leadership among elementary and secondary school students; to reward meritorious academic achievement; and to encourage and assist students in continuing their education after high school.

## Article III - Governance

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The governance of The National Honorary Beta Club shall be the responsibility of the National Beta Club Board of Directors, and its officers and committees, as provided for in the Bylaws.

## Article IV - Membership

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The National Honorary Beta Club shall consist of members as provided for in the Bylaws.

## Article V - Officers

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The National Honorary Beta Club shall have officers as designated in the Bylaws. The qualifications of officers, the methods of their selection, and their respective



powers and duties shall be set forth in the Bylaws, Official Operating Codes, Minutes, Handbooks or Manuals.

## **Article VI - Amendments**

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This Constitution may be amended by a two-thirds majority vote of the members of the Board of Directors in attendance at any of its regular or called meetings. The proposed amendment must be provided to all Board Members and the Executive Director at least thirty days prior to the meeting at which it is to be considered. All officials of the organization are to be notified in writing of any and all amendments to the Constitution and shall abide by them as by the stipulations of the original Constitution.

## **Article VII - Bylaws**

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Bylaws consistent with this Constitution may be adopted. Such Bylaws may contain any provisions necessary for the orderly administration of the National Honorary Beta Club and its affairs including, but not limited to, the governing authorities, officers, elections, and meetings; provided that should there be any inconsistency between this Constitution and the Bylaws, this Constitution shall prevail.

## **Article VIII - Dissolution**

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Procedures for voluntary dissolution shall be included in the Bylaws.

# **Bylaws of The National Beta Club**

## **Article I - Governance**

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Pursuant to the authority granted in Article III of the Constitution, the National Board of Directors has established the following governance structure for the National Beta Club:

### **Section 1. The National Beta Club Board of Directors**

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#### **Subsection A - National Board of Directors**

The National Honorary Beta Club, henceforth titled The National Beta Club in these Bylaws and in all future use of this title for the organization, shall be governed by a National Board of Directors (the National Board).

## **Subsection B - National Officers**

The National Board shall have two National Officers: a Chair and a Vice Chair. These officers shall be elected for a period of one year at the Board's regular annual meeting. It shall be the duty of the Chair to preside at all meetings of the board. In the absence of the Chair it shall be the duty of the Vice Chair to preside at meetings. All officers shall assume office the first day of the month following their election.

## **Subsection C - National Board Composition**

The National Beta Club Board of Directors shall be made up of the chairperson from each State Beta Council.

## **Subsection D - Term of Office**

Each National Board member's term shall be for three years, with no more than one-third of the members of the Board being scheduled for election in one year.

## **Subsection E - Meetings**

The National Board shall meet at least once a year at such a time and place as shall have been determined at the last preceding meeting of the Board. Special meetings may be called upon the recommendation of the Chair and Executive Director or through special arrangements approved by the Board of Directors.

## **Subsection F - Quorum**

Two-thirds of the members of the National Board must be in attendance at a meeting, either in person or electronically, in order to constitute a quorum. Official business of the Board may not be conducted in the absence of a quorum. However, the Board may hold advisory or informational meetings in the absence of a quorum.

## **Subsection G - Executive Director**

The National Board shall select and appoint an Executive Director who will serve as the Chief Executive Officer (CEO) in managing the affairs of the National Beta Club in compliance with policies and procedures established by the Board. The Executive Director's initial contract shall be for a period not to exceed three years and is renewable at the Board's discretion.

## **Subsection H - Policies**

It shall be the duty of the Board to establish all policies of the National Beta Club. Such policies shall include a Code of Ethics that all Board members shall agree to honor.

## **Subsection I - Audit and Budget**

The National Board shall receive the annual audit of the National Office, and shall approve the annual budget for the next succeeding year.

## **Subsection J - Annual Report**

At the annual National Board meeting, the Board shall receive the annual report of activities, and a list of activities planned for the succeeding year.

## **Subsection K - Committees**

In addition to State Councils, the National Board shall set up such organizational committees as shall be necessary for the proper supervision and direction of the affairs of the organization.

## **Section 2. State Beta Councils**

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Any state that has at least 50 local Beta Clubs or at least 2500 student Beta Club Members and that has been recognized by the National Board of Directors as a convention state shall be governed by a State Beta Club Council.

### **Subsection A - Composition**

Each State Beta Council shall be made up of at least five but not more than twelve individuals from that State who are currently employed or retired school administrators. All Council members, in order to serve, must be associated or have been associated with schools that have active Beta Club chapters. The tenure of office shall be for a period of three years. The rotation of State Council members elected to three-year terms shall be accomplished by electing a proportional number (up to one-third) of these members on an annual basis.

### **Subsection B - Meetings**

Each State Beta Council shall meet at least once a year at such time and place as shall be determined at the last preceding meeting. Special meetings may be called upon the recommendation of the State Beta Council Chair and the Executive Director of the National Beta Club.

**CERTIFICATE OF COUNSEL**

I certify that the Supplemental Record on Appeal contains all materials proposed to be included by any of the parties and not any other material.



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