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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM THE ADMINISTRATIVE LAW COURT

S. Phillip Lenski, Administrative Law Judge

Case No. 2020-000950

Dr. Agnes Slayman Appellant

v.

South Carolina Department of Education Respondent.

RECORD ON APPEAL - VOLUME II

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1 Q: All right. So is it your testimony you were
2 following the instructions of your supervisor,
3 Dr. Slayman?

4 A: That is correct.

5 Q: Now on the subject of the sheriff, are you
6 aware of any reason for -- strike that.

7 What are you -- what can you tell the hearing
8 officer about the relationship or the saga
9 between the sheriff and the superintendent?

10 A: It started out when he did beat the incumbent.
11 He met with the group of principals kind of as
12 an introductory measure and also go over some
13 of his protocols as to how he would be entering
14 schools. And he would like to do security
15 checks, maybe have active-shooter drills, that
16 kind of stuff. A couple of the principals
17 expressed some concern, you know, about
18 somebody just popping in, 'cause he alluded to
19 he would kind of do surprise visits and check
20 for open doors, not the main entrance kind of
21 stuff, and people would be plain clothed and
22 all this kind of thing, which he did. That
23 raised the eye of Dr. Slayman. She did not
24 like that. And in my opinion, it began a very
25 confrontational relationship with the sheriff,



1 who -- you know, I worked -- the sheriff in
2 Kershaw County's a good friend of mine. I have
3 a lot of friends in law enforcement, and all of
4 the ones I know only have the safety of the
5 public in their best interest. And I thought
6 he did. And I wasn't adverse to him finding
7 weaknesses. Dr. Slayman did not want him
8 finding weaknesses in the way of school
9 security or safety.

10 Q: Right. Do you recall any specific statements
11 she made to you or in your presence that
12 related to, let's say, the sheriff showing up
13 unannounced?

14 A: Well, ultimately, she told Jeff and myself that
15 she did not want him in our buildings. And he
16 was made privy that he was not wanted in our
17 buildings, which put -- the principal of
18 Louisville High, for example, conversed with me
19 one day and expressed concern. What am I
20 supposed to do if I have an incident at my
21 school? The sheriff is my -- he's my 9-1-1.

22 Q: 'Cause he doesn't have the city -- the chief of
23 police?

24 A: Right. It's more rural.

25 Q: Right.



1 A: And there was a lot of anxiety about how we
2 were supposed to encounter with the sheriff,
3 how we were told not to talk to him, not to
4 contact him. She brought in someone she knew
5 who originally was from Kershaw County who was
6 an officer, an upper officer with the Highway
7 Patrol. Said she would rather have Highway
8 Patrol to respond to any emergency calls. And
9 ultimately, we couldn't even have the sheriff
10 in the buildings to do a lesson on law
11 enforcement or county government or anything
12 like that. He was not welcome at all, and
13 Dr. Slayman said that he was not welcome at
14 all.

15 Q: And he -- okay. She, Dr. Slayman, said those
16 words, "he's not welcome"?

17 A: That's correct.

18 Q: All right.

19 A: My comment to her was -- and I remember this
20 conversation that she and I had. She had --
21 she was very angry one day. I don't know what
22 time of day it was, about the sheriff and she
23 didn't want him in our buildings and she would
24 win. She said, I will beat him. I will come
25 out on top. You know, I'm the most powerful



1 person in this district. And I said it not so
2 much in a joking way. I said, but you do
3 realize he's elected. And then I jokingly
4 said, and he carries a gun legally. I said,
5 you can't win against the sheriff. The only
6 person who can arrest the sheriff is the county
7 coroner, and that's not gonna happen. He's
8 gonna have to do something very egregious for
9 that to happen. And but she would not let up
10 on the sheriff. It was ongoing. And that's
11 how the whole privatizing of the school
12 security started morphing.

13 Q: Okay. I was gonna ask you that. In general,
14 how were the schools secured? Did you have
15 SROs throughout in every school? What was the
16 lay of the land in that respect?

17 A: There were SROs at the high schools. And in my
18 opinion, I thought they did a very effective
19 job. They were, for the most part, born and
20 reared in Chester County and had very deep
21 connections so -- which helped with knowing
22 about the kids, where they came from, what they
23 were facing in their neighborhoods.

24 Q: Now, were these SROs on loan from the police
25 department? Are they individuals that were



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1 hired as SROs? How did that work?

2 A: The process is generally -- and I was not made
3 privy to this. But I know in Kershaw County --
4 I don't know if Chester is like this -- it was
5 basically a budgetary split. The district
6 funded some; the local government funded some.

7 Q: Okay.

8 A: It was basically half and half.

9 Q: So they weren't -- you know, and I'm a little
10 bit iffy on it too. I understand sometimes
11 they are on loan from a department. You know,
12 the City of Columbia has an SRO in a school.
13 But what I understand is you're saying these
14 individual SROs were at the high school and
15 where else?

16 A: I know that they -- there were some who visited
17 the middle and elementaries, but I don't know
18 that they were based there full time.

19 Q: Okay.

20 A: That was more on Mr. Gardner's end of the
21 spectrum as far as that. He ---

22 Q: Okay.

23 A: He was kind of over that as operations.

24 Q: Okay.

25 A: I was just in a lot of those meetings with



1 Dr. Slayman and him.

2 Q: All right. Do you have any other recollection
3 of, you know, the request from the sheriff's
4 department to provide training, provide --
5 professional development, anything like that
6 where they were denied access?

7 A: Dr. Slayman had no interaction with him no
8 matter what. Mr. Gardner and I would see him
9 when we would be out and about at district
10 affairs and at lunch. And his stance was that
11 he was always willing to help. He would help
12 in any capacity. He would work with the
13 district in my manner needed to keep the kids
14 safe.

15 Q: And what's your understanding of what
16 transpired with regard to the privatizing the
17 SROs?

18 A: So ultimately -- I guess you'd call it a
19 screening of a couple of security companies
20 were conducted concurrent with hiring a
21 district chief of security, who was currently
22 the chief of the then chief of police at
23 Chester County. We then ultimately selected an
24 entity -- I guess they're still around. They
25 were called Defender Security -- to provide



1 security officers, not resource officers,
2 who -- they did not have arrest powers -- to
3 serve as resource officers or security officers
4 in the schools. Gosh, so much runs through my
5 head about that whole time span.

6 That -- also during that part, we were --
7 Mr. Gardner and I were generally responsible
8 for interviewing the chief of security, which
9 was a very awkward process because Dr. Slayman
10 would not divulge to us whether or not this
11 person would be a district employee, as you
12 know, which comes with fringe and benefits like
13 any other State employee, or if the person
14 would be a Defender Security company employee.
15 And we would get asked that. We'd probably
16 interview eight or ten people. And they would
17 ask that question. We'd have to tell them I
18 don't know. And so well, I can't -- I don't
19 know if I'm interested if I don't know who I'm
20 working for or what the salary will be. I do
21 know that the salary was posted at 38,000.

22 Q: Right.

23 A: That was a public posting. Dr. Slayman steered
24 us to hire -- his first name's Andre. I cannot
25 remember his last name -- who was the then



1 police chief of Chester -- or police chief of
2 the City of Chester to be the district's
3 security chief. And at that time in a meeting
4 with me, Jeff, and Ms. Williams, Dr. Slayman
5 directed Ms. Williams to gross up the chief's
6 salary to upper 60s so that his draw would be
7 38K. Because that's the only way he said he
8 would come in to serve in that capacity. And
9 Dr. Slayman divulged to me and Mr. Gardner.
10 She did not apprise the board of that. Whether
11 she did or not, I can only tell you what she
12 said at that time.

13 Q: And this person that you've just described was
14 going to be the head of security; is that
15 correct?

16 A: Chief of security.

17 Q: Chief of security.

18 A: Which ultimately his role was then to serve as
19 the oversight person for the security guards
20 who were then placed in the school facilities.

21 Q: Okay. Give me one second.

22 A: The interesting thing is we had a luncheon as
23 kind of the grand announcement of the replacing
24 the school resource officers, the certified law
25 enforcement officers with these security folks.



1 Held it in the cafeteria of Louisville High
2 School, and there were at least four or five of
3 the security officers present. Because
4 Defender had not had time to hire the ones who
5 would be serving in Chester's facilities,
6 Dr. Slayman directed them to just bring in some
7 security officers you have, that you already
8 have employed, whether they're gonna work here
9 or not. I only think one he -- I only think
10 one of them was ever intended to be placed in
11 our facilities in Chester. And the board was
12 told, here they are. These are our security
13 officers. But they were not.

14 Q: So is it your -- is the -- who called that
15 meeting? Did the board request such a meeting?

16 A: Dr. Slayman, to her credit, was very good about
17 publicizing what she deemed, and usually was,
18 positive movements or positive initiatives that
19 we were undergoing.

20 Q: Right.

21 A: So she arranged for this luncheon to be held at
22 Louisville High School.

23 Q: And were board members present at that
24 luncheon?

25 A: I know at least three were. I recall three.



1 Reverend Stringfellow, Ms. James, and
2 Ms. Lawson.

3 Q: So is it your testimony that these employees of
4 Defender were just stand-ins?

5 A: That is correct.

6 Q: Was it ever said at that meeting that these are
7 your SROs? Or how was that ---

8 A: It was said at that meeting, these are your
9 security officers, yes, as if they were going
10 to be the ones -- ours.

11 Q: As if those are the ones that'll be protecting
12 the kids?

13 A: Right.

14 Q: They will be in your schools?

15 A: Right. But it turns out they were, as you said
16 and as I'll say, stand-ins for Defender. They
17 worked elsewhere. One of them worked at a
18 nuclear plant. One of them worked in
19 Greenville that did mostly like concert
20 security and event security, that kind of
21 stuff.

22 Q: Just if you remember, describe for me, did they
23 ask these gentlemen -- or ladies and gentlemen
24 to stand up, or did they, you know, raise their
25 hands? How did they present them to the



1 public? How were these ---

2 A: They did stand up, and they had on the attire,
3 like a logo shirt, if I recall correctly.

4 Q: And who made this announcement? Who introduced
5 them; do you know who?

6 A: I do not.

7 Q: Now, you described an incident a minute ago
8 where Dr. Slayman berated you in public. Do
9 you remember any other occasions where she did
10 something similar to you in a public setting?

11 A: Well, she would get antagonistic toward me in
12 front of principals. It was usually one or
13 two. I probably have specific examples in my
14 notes.

15 Q: You can refer to your notes, if you like.

16 A: And on several occasions she, you know, use a
17 slang term, she'd blister me pretty good. And
18 I'd be like, oh, my gosh. You know, what did
19 I do? And then the people in the office would
20 leave, and then she would summon me back and
21 then say, now, I had to get on you like that in
22 front of them to let them know who the boss is.
23 I know you really didn't screw up. I know you
24 really didn't make the mistake, but I have to
25 get the lay of the land straight.



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1 Q: All right. So ---

2 A: Not -- those weren't her words, but that was
3 the gist of what she would say to me.

4 Q: How often did that occur where she berated you
5 in public or in front of other coworkers,
6 colleagues over the -- let's say 2013 to 2015?

7 A: With me, maybe four or five times.

8 Q: Okay. And like I said, you're free to refer to
9 your notes if you can -- if you'd like to.
10 Now, these notes you're referring to, did you
11 create them recently, or what would you
12 describe you're looking at?

13 A: I had these notes archived -- well, actually,
14 I had multiple sets of notes archived from my
15 time in Chester, especially when things really
16 started -- when I was made aware that
17 Ms. Bagley was gonna come in to do, I guess,
18 you'd call an investigation. I'm not sure what
19 you would call that.

20 Q: All right.

21 A: I had just as a point of reference for me, and
22 I am my own worst critic, so I always keep
23 notes, either it be from Dr. Slayman or
24 another. I worked for eight superintendents.
25 I've always kept notes as to what I could do to



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1 be better and instances that I've been involved
2 in.

3 I can tell you when -- even about the security
4 matter when all the principals were summoned to
5 meet in -- I think it was that same Chester
6 High media center office. Two of them told me
7 after that meeting that -- this is
8 Dr. Slayman -- laid down the law that there
9 would never been any negative commentary with
10 regarding the security officers. This is
11 opposed to SRO -- that the principals weren't
12 allowed to speak about the security officers.
13 They were asked by community members or the
14 media, and she told them -- Tammy Graham said
15 this to me and Wendell Sumter said this to me.
16 They walked out and said she'd just threatened
17 to kill us if we said anything.

18 Q: Okay. Did you ever hear her use those words?

19 **MS. POLVI:** Just a quick objection of the form of --
20 I would seek to strike that, as it's hearsay,
21 that neither -- he's asserting that -- it's an
22 out-of-court statement asserted for the truth
23 of the matter asserted, and it's not statements
24 that he himself made.

25 **HEARING OFFICER:** I agree. It is hearsay, and I'm



1 striking it.

2 Q: Did you ever hear her say things like or the
3 words "I will kill him" or ...

4 A: I've heard -- I mean, do you want me to use ---

5 Q: Sure. Use it all.

6 A: --- profanity?

7 Q: Yes, absolutely.

8 A: Okay.

9 Q: Whatever you remember.

10 A: Referring to a school board member, Rick
11 Hughes, I will kill that son of a bitch; to
12 Shawn Williams, I will rip your throat out; to
13 Jeff Gardner, I will cut your knees out from
14 under you if you do this again. That's when --
15 and I would say mostly the last year that I was
16 there and Dr. Slayman was there, that's when
17 things really just started escalating. The
18 aggressive manner, the threatening remarks to
19 the point where the day she made the threat to
20 Ms. Williams that she would rip her throat out.
21 And it was -- I vividly remember Ms. Williams
22 had had some sort of event and had invited
23 board members to join in. It might have been
24 the recruitment fair. I don't recall. And in
25 a board meeting, Ms. Williams publicly thanked



1 the board members who were able to attend. And
2 Dr. Slayman took that as a slam on the ones who
3 were not able to attend, and evidently one of
4 them said something about it 'cause that's what
5 she said in the cabinet meeting that next day.
6 Ms. Williams, obviously, was very offended.
7 Dr. Slayman called me in not long after and
8 said she got upset and I said, yeah, she sure
9 did. You think she's gonna do anything? I
10 said I don't know. I said -- she's said, well,
11 you know I say that kind of stuff. And I
12 said -- I remember my direct statement was you
13 know you're -- I don't want to say diminutive
14 in a negative way but diminutive in size or
15 stature. I said, Agnes, you know, when you say
16 it to us, I say, well, I don't -- it hurts but,
17 you know, you're not a big woman. I don't
18 think you would do that. I said, but if it
19 were ever written on paper, it makes you look
20 seven feet tall wielding an axe.
21 But it didn't stop. And it was a very regular
22 occurrence. The he is screwed; I'll kill him;
23 I'm gon' get him; this will be the end of her.
24 A principal and a -- or a vice principal and a
25 teacher wrote a character reference letter



1 personally, not in a professional capacity, for
2 a former student of theirs who was going
3 through a trial, a felony trial. And
4 Dr. Slayman found out about it, and she called
5 them ignorant and said if you ever do anything
6 like that again, I will fire you. And they
7 walked out perplexed. Well, we didn't do
8 anything in our professional role. What was
9 the problem?

10 But it was always interactions like that, and
11 it got to the point where we would walk out of
12 cabinet meetings. Or if it was just me and
13 Jeff or just me or Jeff would come out and go
14 like, oh, my gosh, she's killing us. I mean,
15 the -- kind of the joke he and I had to kind of
16 give some levity, when we would get summoned,
17 the carpet had a green stripe and we would just
18 say, oh, my god. Walking the mile. Walking
19 the green mile, because it was a green carpet.
20 Because we never knew what was coming next.
21 And so it just progressed to the point where
22 Jeff's like, man, I got to do something. He
23 was undergoing counseling at the time. I'm
24 sure he can provide that directly. He apprized
25 me that he was starting to have to take blood



- 1 pressure medicine. And he came out of her
2 office one day, and he was just like this
3 (demonstrating). He was a basket case.
- 4 Q: And just for the record, you observed him
5 shaking?
- 6 A: I did.
- 7 Q: After he met with Dr. Slayman?
- 8 A: Directly from her office, he came to my office
9 to vent. And he -- I saw Brooke get like this.
10 You know, Dr. Slayman made a statement in front
11 of us -- I know it was me and Brooke -- that
12 our PR department sucked, quote/unquote.
- 13 Q: And Brooke was in charge of the PR department?
- 14 A: She was the PR department.
- 15 Q: Right.
- 16 A: And ---
- 17 Q: What did you observe, if anything, of
18 Ms. Clinton at that time? Can you describe it
19 for the record?
- 20 A: Well, I walked into our office to console her
21 'cause she was -- she started crying. 'Cause,
22 I mean, she worked as hard as any of us to do
23 whatever Dr. Slayman said we needed to do.
- 24 Q: All right. How long have you known
25 Ms. Clinton, just the amount of time that you



1 worked there ---

2 A: Correct.

3 Q: --- in Chester? And how about Mr. Gardner?
4 How long have you known him?

5 A: When I started in Chester, he was principal of
6 Chester High, so I knew him in that
7 relationship. I was never the supervisor of
8 the principals, just the folks in my department
9 and the DO. Dr. Slayman was adamant that she
10 was the go-to for the principals, which
11 obviously was fine. But, again, after Colonel
12 Turner passed away, Mr. Gardner applied for and
13 ultimately was hired as the other associate
14 superintendent. So from I guess mid-2013 to
15 now I've known him ---

16 Q: Okay.

17 A: --- personally.

18 Q: How do you know about the blood pressure
19 medicine?

20 A: He told me directly he started having to take
21 blood pressure medicine.

22 Q: Do you remember if he -- strike that.
23 Did you observe other occasions where he was
24 upset as it related to an interaction with
25 Dr. Slayman?



1 A: I did. His -- even his own secretary would
2 come into my office, which is kind of
3 catty-cornered across from her open office and
4 say, you might want to go in and talk to
5 Mr. Gardner. He's upset. And I don't mind
6 telling you that the most remarkable thing --
7 and, you know, I worked in high-stress
8 environments. Again, I worked for five
9 principals, eight superintendents. I know what
10 stress is. I have no problem with stress when
11 it's due stress, meaning if it's a reasonable
12 reason to have stress. But we would walk out
13 of that office sometimes like, oh, my god, that
14 makes no sense. Here we go again. Mr. Roddy
15 said to do this, or her breakfast club said to
16 do that.

17 And I would be in a meeting -- when I was
18 leading advanced ed, I had arranged for -- we
19 had one underroof building down the hill from
20 the district office that accommodated three
21 separate elementary schools known as Chester
22 Park. I had arranged to meet with those
23 principals and some of their staff, upper level
24 staff about advanced ed. It was a meeting I'd
25 had scheduled for a couple of weeks. And I got



1 a call from Dr. Slayman saying I need to see
2 you in my office. I said, well, I've just
3 started this meeting. No. I need to see you
4 now. I've had this meeting on -- I'm the one
5 leading the meeting. Just call it quits. Stop
6 it.

7 So I went back up the hill, and it was only to
8 hear her chide and derail the sheriff. Had
9 nothing to do with school business. And that
10 was just an ongoing phenomenon.

11 Q: Any other observations that you want to share
12 about Mr. Gardner, how he looked, how he acted?

13 A: I mean, there was a visible change in him. You
14 know, my bachelors degree's in physiology. I
15 owned a health club. I know what people's
16 physical appearance looks like. He was at a
17 breaking point. And he is the one -- I say
18 this in open forum, I guess, that said, if we
19 do something, I'm gonna die. It's killing me.

20 Q: Are you aware of any other -- and we can ask
21 him, of course -- but were you aware of any
22 other outside factors in Mr. Gardner's life
23 that he could have been attributing his I'm
24 gonna die statement to?

25 A: He led an active lifestyle. A hobby craftsman,



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1 wood, very solid marriage. I had remained not
2 distant friends. We've gotten together maybe
3 once a quarter since I left Chester. So I'd
4 become friends with his wife. Very model
5 couple, so to speak. They'd been married so
6 long. Two sons and a daughter, got grandkids.
7 No, I don't -- I did not ever see any or hear
8 of any external influences other than the work
9 environment that caused him to ...

10 Q: And you worked with him five days a week,
11 eight, nine hours a day; is that fair to say?

12 A: That is correct. Usually we do -- probably
13 three days out of the week, we'd go to lunch
14 together. The other two days, we would go work
15 out at the Y together. I got him into that to
16 try help him blow off some steam, to be honest
17 with you.

18 Q: The incident with the volunteer stipend
19 cheerleading coach that was fired, do you
20 remember any other instances where you were
21 told to go fire someone, or do you remember
22 other occasions where Dr. Slayman threatened
23 people with their jobs?

24 A: It was so commonplace. I remember the director
25 of the alternative school left a door up one



1 afternoon, so it was unsecured. Dr. Slayman,
2 I don't know how she found out about it, but
3 her words to me when she called me was, I want
4 you to go down there and rip Danny's head off.

5 Q: And who was Danny?

6 A: Danny Scruggs was the direct or principal of
7 the alternative program. We had ---

8 Q: Why was she mad at Danny?

9 A: Pardon me?

10 Q: Why was she mad at Danny?

11 A: 'Cause she found out he left the door unsecured
12 and it was supposed to been locked.

13 Q: They don't have an SRO?

14 A: That's interesting. It was a part of -- it was
15 housed in the Chester Middle School complex.
16 And there was an SRO on site there.

17 Q: Okay. So did you go rip Danny's head off?

18 A: I did not. I went and told him that
19 Dr. Slayman was upset he left the door open.
20 I have never threatened anyone in an aggressive
21 manner or with their job, especially if it
22 wasn't something egregious enough to do that
23 for.

24 We had a situation where a coach's son who was
25 trying to finish college did not take his



1 requisite foreign language courses. Turns out
2 when he was in high school, he had a 504 plan.
3 And if he had acted responsibly and utilized
4 that through his college experience, he could
5 have been exempted. Dr. Slayman called the
6 director of special services in, Jeannie Ligon,
7 to inquire about that. And she -- I won't say
8 coerce. She basically said I need for you to
9 change the document to show that he got the
10 services at Louisville.

11 And Jenny said, I'm not gonna do that. That
12 would be altering a legal document, a federal
13 document. And Dr. Slayman kept trying to
14 persuade her, and it got a little more forceful
15 to the point where Ms. Ligon said, do I need to
16 call my attorney? I'm not going to do that.
17 Dr. Slayman dismissed her and told her go.

18 Q: This occurred in Dr. Slayman's office?

19 A: It did. And I was present. And Dr. Slayman
20 asked me if I thought -- if she thought -- if
21 I thought she ought to fire Ms. Ligon for not
22 doing what she asked her to do.

23 Q: And what did you tell her?

24 A: I said I wouldn't change it. It's a federal
25 document. It's a legal document. That would



1 be illegal to change that document, especially
2 something that was already in place.

3 Q: So ---

4 A: Been in place.

5 Q: --- this student was graduating from college
6 or -- and did not, as I understand your
7 testimony, student had not completed his -- or
8 her requirements -- his requirements for
9 graduation?

10 A: Correct.

11 Q: So the -- is it fair to say that the parents
12 were under the gun to try to -- or the student
13 to try to correct the record, so to speak ---

14 A: Right.

15 Q: --- so that he could graduate?

16 A: Right.

17 Q: That's your understanding?

18 A: That is correct.

19 Q: Okay. Was anyone else in the room besides
20 Ms. Ligon?

21 A: No, sir.

22 Q: You, Ms. Ligon, and Dr. Slayman?

23 A: That is correct.

24 Q: All right. Can you just give me just one
25 second?



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1 **MR. WINBURN:** We're off the record.

2 **(Off the record)**

3 **MR. WINBURN:** Dr. King, I just have a few more
4 questions. I'm gonna hand you Petitioner's
5 Exhibit 13. It's been premarked for
6 identification.

7 **(Petitioner's Exhibit Number 13 was introduced into**
8 **the record at this time.)**

9 Q: Can you tell me what you are looking at or what
10 that appears to be?

11 A: These were my -- the first thing were my
12 initial notes from back late summer of 2015.

13 Q: Okay. Are those the ones that are handwritten
14 King on top of it?

15 A: That is correct.

16 Q: All right. And as you continue, there is a
17 typewritten Dr. Charles King section that
18 begins, my primary concerns I have witnessed?

19 A: Right.

20 Q: Okay. Follow -- and that ends with what
21 appears to be sort of a typewritten signature
22 Dr. Charles King; is that correct?

23 A: That is correct.

24 Q: All right. So I wanted to ask you a couple of
25 questions based on this exhibit. Under the



1 "primary concerns I have witnessed" section?

2 A: Yes, sir.

3 Q: In the middle of the page, it appears that you
4 had included in bold that and quote, I, in
5 parentheses, Slayman, end parentheses, lied to
6 the board and told them that you were in on all
7 the interviews, end quote?

8 A: Yes.

9 Q: What does that relate to?

10 A: That goes back to interviewing the new chief of
11 security for the school district. There were
12 some -- as it began to evolve into a more
13 lengthy process than we thought, there was --
14 sometimes I was not able to be in the
15 interviews. Dr. Slayman told the board -- or
16 she told us she told the board that she said we
17 were -- that the both of us were in all of the
18 interviews, and she directly said, I will --
19 she used the I lied to the board and told them
20 you were in on all the interviews. She said
21 that to me and Mr. Gardner.

22 Q: And why was that?

23 A: She also informed the board that the security
24 officer would have arrest powers, and they did
25 not.



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1 Q: So Defender SROs -- contract SROs do not have
2 arrest powers?

3 A: They did not at that time.

4 Q: All right.

5 A: Correct.

6 Q: Does that mean -- so what does that mean? Does
7 that mean they would have to call for backup?

8 A: Presumably the call would still -- if there was
9 a severe incident, physical incident or
10 whatever, they'd still have to call law
11 enforcement to come take this student away.

12 Q: So ---

13 A: Or whomever away.

14 Q: So in the rural schools, would that mean the
15 sheriff's office?

16 A: That would mean the sheriff's office. But,
17 again, she had attempted to develop a rapport
18 with the Highway Patrol so that they would
19 respond instead.

20 Q: Do you know if that was ever established
21 that -- well, and it won't be the sheriff; it
22 would be the Highway Patrol state troopers?

23 A: I do not know if there was ever an incident
24 where they were called. I know one principal,
25 naming Dr. Jim Knox was principal then of



1 Louisville High School said he was gonna call
2 the sheriff anyway. Said, I'm gon' do whatever
3 I need to do to keep my kids safe. But to the
4 credit of the principals, they were, I guess,
5 fortunate we didn't have any incidents to where
6 anyone had to be called.

7 Q: All right.

8 A: As I recall. But she did say to me there was
9 an article about the luncheon, the presentation
10 event we had for the new security officers, and
11 I was quoted, as I said in my notes, I was
12 asked, you know, what's the primary purpose?
13 And I said, of course, to keep our kids safe.
14 And Dr. Slayman's direct comment to me was,
15 well, you're in deep now. If we go down over
16 this, you go down too, meaning her and Jeff.

17 Q: Okay. All right.

18 A: And that's not the only time she said that to
19 me.

20 Q: That you were in deep and going -- if you're
21 gonna -- if I'm going down, you're going down
22 with me: Is that a statement she would make
23 often?

24 A: The day that she was placed on administrative
25 leave as a result of the grievance, she called



1 me. I think that was that evening at home.
2 She sounded upset or distraught. And I'll
3 never forget. I was on my bike trainer
4 exercising. First thing she said was, I'm
5 not -- it was told not to call anyone. I'm
6 calling you anyway. Do you know -- and she
7 kept inquiring as to who I though initiated the
8 grievance, asking me for names. And then she
9 said to me then, you know if I go down, you're
10 gonna go down with me.

11 Q: Right.

12 A: And I was -- I had been told at that point not
13 to relay any information to her.

14 Q: So in other words, don't tell her who all
15 signed that grievance that we've entered into
16 evidence already?

17 A: That is correct.

18 Q: All right. Did you have any other
19 communications with her after that point, after
20 that phone call?

21 A: Well, she came back for a number of days, maybe
22 a week. And obviously in the course of the
23 normal conducting of business, had to have some
24 dialogue with her about some issues we were
25 contending with. One I remember -- I want to



1 say one had to do with a class ranking matter,
2 a student where they -- like, salutatorian and
3 valedictorian kind of thing and ---

4 Q: Right.

5 A: She met with me and one of my instructional
6 staff in the foyer of her office, which is
7 where Ms. Callie McConnell was located, not in
8 her office. But that's really the only
9 interaction that I had with her that week she
10 was back.

11 Q: And moving down a little bit to the hostile
12 workplace section of your notes, as I
13 understand your testimony -- this is what we're
14 looking at (indicating). I think you had
15 already testified as to these quotes that
16 you've got listed: To Ms. Williams, quote,
17 I'll rip your throat out; to Mr. Gardner,
18 quote, I'll cut your knees out from under you.
19 That was stupid; To Ms. Clinton, you screwed up
20 my speech. This could cost you your job. I
21 don't think you've testified to that one yet.
22 But all -- are those three quotes, are those
23 accurate?

24 A: They are.

25 Q: And you heard her say that? This is not an



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1 occasion where someone told you this is what
2 she said?

3 A: I heard those quotes directly.

4 Q: All right. The bottom of the next page that
5 begins in bold, she threatened me when a word,
6 the word "itinerary," was misspelled. Can you
7 tell me about that?

8 A: That was a presentation or some information I
9 was directed to present to the school board.
10 And one of the board members, who was a former
11 principal at that time, and Dr. Slayman
12 informed me that I had inadvertently misspelled
13 the word "itinerary." Unfortunately, spell
14 check didn't catch it, obviously. But anyway,
15 it was misspelled on a school board agenda, and
16 she directly said -- she -- very angrily, if
17 you want to keep your job, this kind of thing
18 will never happen again. And she quoted -- the
19 quote I remember her saying I'd get crucified
20 if it ever happened again.

21 Q: That conversation, do you remember where it
22 took place?

23 A: In her office.

24 Q: Okay. Do you remember if the door was open or
25 closed?



1 A: I don't recall.

2 Q: Did you oftentimes -- when you were summoned in
3 her office, did you close the door behind you,
4 or was it ---

5 A: Almost always.

6 Q: Okay.

7 A: Almost always. She asked me to close the door.

8 Q: Okay. Now, moving on, there's another page
9 that's indicates superintendent expectations
10 September 2015. Is that in your exhibit?

11 MS. POLVI: Let me pause there.

12 (Off the record.)

13 Q: Dr. King, were you aware of any improvement
14 plan that was issued or proposed to -- do you
15 have any personal knowledge of an improvement
16 plan issued or proposed to Dr. Slayman?

17 A: The document that you all just referred to, I
18 was told by the school board chair that
19 Dr. Slayman would be provided and worked with
20 on developing an improvement plan. And I was
21 provided a copy of this document. That's about
22 all I can say ---

23 Q: All right.

24 A: --- about it.

25 Q: Do you remember -- do you know how you came in



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1 possession of this document?

2 A: I was provided it by a board member.

3 Q: All right. Do you remember which board member

4 it was?

5 A: I do not recall.

6 Q: All right.

7 A: I can give you one of two names who it may have

8 been, but I don't recall.

9 Q: That's okay. As I mentioned earlier, it's

10 no -- I'll deal with that. Did you author the

11 Betty Bagley report?

12 A: I did not author that report. I was privy to

13 a witness of most of what's in the report, but

14 I did not author it.

15 Q: All right. Were you interviewed ---

16 A: I was.

17 Q: --- by Betty Bagley?

18 A: I was the very last one interviewed.

19 Q: Were you -- how long did that interview take?

20 Or where was it?

21 A: It took place in the conference room in the --

22 kind of the executive suite corner of the

23 building. And probably an hour and a half.

24 Q: Okay. And are you familiar with the report?

25 A: Very much so; yes.



1 Q: Did anybody else sit in with you and Betty
2 Bagley, or it was just the two of you?

3 A: It was just the two of us.

4 Q: All right. And I understand there's an
5 objection to it being entered. But if I may
6 ask you a couple of questions -- although I
7 think you've already testified to some of
8 it ---

9 MS. POLVI: And, again I would say, without it being
10 entered, he should not be able to refer to it
11 to answer questions that you're about to ask.

12 MR. WINBURN: That's fine. I'm just looking at it.
13 Oh, what's that? Oh, you don't want him to
14 look at it?

15 MS. POLVI: Right.

16 MR. WINBURN: That's fine. I -- I'll ---

17 MS. POLVI: If you'll just flip it over for me?
18 Thanks.

19 Q: Yeah. You can look at your notes though that
20 we've already talked about. So a couple of
21 other little topics I want to ask you about,
22 and then I will let you go and you can answer
23 any questions Ms. Polvi may have of you. Do
24 you have -- were there any occasions where you
25 were reprimanded in any way for taking time off



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1 or away from the district?

2 A: I won't say that I was ever reprimanded. The
3 most I can say about that is there was a -- it
4 was such an issue to request time off that most
5 of us did not. I won't even say most of us.
6 I did not. I always had leave days left over
7 at the end of the school year. However, there
8 were times when I -- that led to that that made
9 me not ask for time off.
10 For example, in late 2012, my oldest brother
11 passed away. Dr. Slayman obviously was
12 notified. When I finally spoke with her, she
13 asked me how many days I was gonna need for
14 that. And when I told her, she said, are you
15 sure you're gonna need to be out that long?
16 The only sympathy I got from her was she knows
17 one of my other brothers pretty well. She's
18 had a working relationship with him before.
19 She asked if it was him. And I said no, it was
20 my oldest brother. Oh, well, how long are you
21 gonna need to be out? And then I told her, I
22 said, well, you know, it's three days. She
23 said, do you really need to be out that long?
24 And I said, well, my sister-in-law is -- does
25 not know my brother's military history. I need



1 to go into the funeral home. I had go give a
2 whole bunch of reasons. Then a spade of bad in
3 my life there. My brother's son, about two
4 months later was killed in an automobile
5 accident.

6 Q: The same brother that ---

7 A: The same brother. And then I called
8 Dr. Slayman about that, and then she said,
9 you're not gonna need to take time off for
10 that, are you? And I said, well, actually, I
11 am. I'm a pallbearer. But just one day. That
12 kind of question. Yes.

13 And then about two months later after that, my
14 brother's wife, my nephew's mother died in an
15 accident. And I had to take a day off from
16 that, but I only took one day.

17 Q: Did you ever -- do you recall any specific
18 discussions with Dr. Slayman about the death of
19 your former mother -- sister-in-law?

20 A: Well, I knew by that point because, you know,
21 I also lost two very dear friends during that
22 time. I did not request time off to go to the
23 funerals because it -- just blatantly speaking,
24 it was not worth the hassle and the
25 disparagement I felt like I'd receive if I did.



1 So when I called her about my sister-in-law, I
2 just immediately said I will only need one day
3 for the funeral.

4 Q: All right.

5 A: And the -- when I would take time off, I mean,
6 she -- I had -- my wife and I went on an
7 anniversary trip. The airplane had mechanical
8 issues coming back. I had to take an extra
9 day. Dr. Slayman got angry about that.
10 Wouldn't speak me for a week.

11 Q: Any issues between -- that you observed
12 regarding, well, remarks concerning race?

13 A: Not anything blatantly toward anyone. She
14 would use the words "black" ---

15 Q: Uh-huh.

16 A: --- you know, like I'm -- you know, but not
17 anything blatantly racist that I would say.

18 Q: And do you recall -- switching gears again, do
19 you recall any incidents related to
20 transportation, bus drivers that you'd had to
21 deal where?

22 A: I did deal with that. That was Mr. Gardner's
23 arena.

24 Q: Okay. Give me one second. Is there anything
25 else that you think -- would you like to -- any



1 other examples. Strike that.

2 Any other examples like hostile work
3 environment that you haven't discussed today
4 that you believe would benefit Ms. Pike's
5 deliberations in this case?

6 A: The only thing I can say is it was -- you know,
7 there was always an air of unease, stress that
8 I felt was undue. I mean, the district
9 generally ran pretty smoothly, I thought. Most
10 of things came up were political in nature.
11 Just a couple of other things to recount, when
12 Colonel Turner -- or Mr. Turner passed away --
13 I may have said it earlier. I don't remember.
14 Oh, I was crying. I had gotten close to the
15 guy. He's a very, very fine man. And I'm
16 sitting in Dr. Slayman's office about three or
17 four hours after we heard the news, and she
18 looked at me and said, I wonder who we're gon'
19 get to replace him. You know, who -- do you
20 have anybody in mind? Like, oh, my gosh, he
21 just died like hours ago.

22 We had a principal who's mother had a lengthy
23 bout with cancer, and Dr. Slayman expressed to
24 me and Mr. Gardner on multiple occasions, oh,
25 my god, he's out again. He's out with his mom



1 again. And then when she died, I came back
2 from the funeral. She said, well, at least he
3 won't need any more time off after this.

4 And then I recall a meeting that I was in on
5 with her and Mr. Gardner, and Dr. Slayman asked
6 for a -- all the principals to come in, which
7 happened fairly frequently. She would pull the
8 principals out of the building for, I mean,
9 just one item. In my mind, I can't even recall
10 any of them because they were nonincidental to
11 me. And a couple of the principals bucked a
12 little bit, so, you know, we need to be here.
13 It's during -- I can't remember if it was at
14 the beginning of school or it was something
15 going on. And Dr. Slayman looked at me and
16 Mr. Gardner and said, Jeff, just make it
17 3:30 on Friday. That'll fix them.

18 Q: I'm sorry. Make what 3:30?

19 A: Make the meeting -- instead of calling it
20 today, which was like a Thursday at 11:00, let
21 it be -- just make it 3:30 tomorrow afternoon
22 on Friday. We'll fix them. They'll come when
23 I want to after that. But I guess going into
24 this -- and, you know, when I say all that, so
25 we did do some good things in Chester. We had



1 a one-to-one technology initiative,
2 apprenticeship program, the reformulation of
3 Title I, lots of good things going on but I
4 felt always were overshadowed by just minute
5 her rambling, harassments, threatening
6 environment. Just a hostile place to work.

7 Q: And these behaviors that you described, you
8 know, was it in line with what you have
9 experienced throughout your career of other
10 educators? This type of behavior, have you
11 ever experienced it before?

12 A: Not as an educator; no. Not even close. Not
13 even close.

14 Q: Okay. If you were offered a job to work with
15 Dr. Slayman again, would you do it?

16 A: My wife and I have had that discussion, and I
17 have said I wouldn't do it, no matter what the
18 incentive, what the pay. No. Absolutely no.

19 Q: That's all I have. Thank you.

20 **DR. KING - CROSS-EXAMINATION BY MS. POLVI:**

21 Q: Dr. King, I have -- it's my opportunity to ask
22 you some questions. Let's start with ---

23 **MS. POLVI:** If we can get out Exhibit 8? Thank you.

24 Q: Dr. King, I've handed you what ---

25 **HEARING OFFICER:** Give me just a minute and let me



1 catch up with you. Hold on just a second.

2 MS. POLVI: Of course.

3 HEARING OFFICER: I'm sorry. We're on Exhibit ---

4 MS. POLVI: 8.

5 HEARING OFFICER: 8. Okay. I'm up with you. Go
6 ahead.

7 (Respondent's Exhibit Number 8 was introduced into
8 the record at this time.)

9 Q: Dr. King, you have a two-page document before
10 you. It's been premarked as Respondent's
11 Exhibit 8. It's a document dated August 30th,
12 2011. It appears to be your signature on the
13 second page. Is that, indeed, your signature?

14 A: Appears to be so; yes, ma'am.

15 Q: And is this a document that you drafted?

16 A: Yes, ma'am.

17 MS. POLVI: I'd like to enter it into evidence.

18 MR. WINBURN: No objection.

19 HEARING OFFICER: Okay. So entered.

20 (Respondent's Exhibit Number 8 was admitted into
21 evidence.)

22 Q: This document is a recommendation letter that
23 you provided to the Chester County School
24 District in support of Dr. Slayman's
25 application to become superintendent, is it



1 not?

2 A: Uh-huh.

3 Q: I'm sorry. You have to be verbal for our court
4 reporter.

5 A: Yes. I'm sorry. Yes, ma'am.

6 Q: And in here you describe that you had worked
7 what you'd state here as worked closely with
8 her, meaning Dr. Slayman, for approximately 11
9 years as you both worked in the Kershaw County
10 School District; is that accurate?

11 A: That is correct.

12 Q: And that Dr. Slayman had supervised you on
13 multiple levels when you were assistant
14 principal?

15 A: Just one -- well, one tenure. One year.

16 Q: And a time frame when you were a principal in
17 Kershaw County School District?

18 A: I -- you know, I don't know if she was my
19 supervisor or not, to be honest with you. I
20 don't know what the work structure was, but she
21 was an associate assistant superintendent, and
22 I was a principal.

23 Q: And based on those 11 years of working closely
24 together, you described to her as being --
25 distinguishing herself at every level in the



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1 educational field, right?

2 A: Absolutely.

3 Q: And that she was highly regarded by employees
4 at all levels of the Kershaw County School
5 District and by parents and community members;
6 is that accurate?

7 A: Based on my experience, initially were high;
8 yes, ma'am.

9 Q: And you strongly recommend her -- Dr. Slayman
10 for the position of superintendent, did you
11 not?

12 A: I did.

13 Q: So based on your testimony today in the
14 seven-page document that we see that you
15 produced to Betty Bagley and thereafter has
16 resulted in it being given to the Department of
17 Education, paints a very different picture of
18 Dr. Slayman; isn't that true?

19 A: Yes, it does.

20 Q: And so with regard to the statements that you
21 included in your recommendation letter, you
22 felt that she was an excellent person for the
23 job in the first place, right?

24 A: I did.

25 Q: And that ultimately you obtained the position



1 with the Chester County School District at the
2 strong recommendation of Dr. Slayman, did you
3 not?

4 A: Correct.

5 Q: And you would not have become an associate
6 superintendent but for Dr. Slayman's support?

7 A: Not in Chester County, I would not have.

8 Q: And prior to you obtaining that associate
9 superintendent of curriculum position in
10 Chester County School District, you had never
11 obtained a role at that level in your career
12 thus far?

13 A: Not other than being a school board trustee.

14 Q: And Dr. Slayman was the person who initiated
15 hiring you with Chester County School District,
16 correct?

17 A: I actually don't know the answer to that. I
18 know that I was contacted by Dr. Slayman that
19 the position was going to be coming available,
20 and I was encouraged to apply. And I did so,
21 and it was a panel interview, which I'm sure
22 Dr. Slayman had the final say regarding that.

23 Q: And at the time, you had taken a sabbatical of
24 sorts from the education field and owned a gym?

25 A: That is correct. Except I worked as a -- an



1 adjunct professor for a university, and I also
2 was on the school board in Kershaw County, so
3 I kind of held on to my education experience
4 during the time I owned my gym.

5 Q: And you were aware at the time that you were
6 hired that the board wanted your hire in order
7 to help bring order to what they described as
8 a contentious district office? You were told
9 that when you were hired, correct?

10 A: I don't know if the word "contentious" was
11 used, but Dr. Slayman did say there were some
12 issues that needed to be resolved.

13 Q: And that you were hiring -- was sought to help
14 do reorganization, not necessarily fire people
15 but to try to reorganize and promote a better
16 functioning district office?

17 A: That is the charge I was given at the time I
18 got hired.

19 Q: And you're aware of that during the time frame
20 you were associate superintendent under
21 Dr. Slayman's leadership that she engaged in
22 succession planning with the school board; is
23 that right?

24 A: Meaning?

25 Q: Succession planning for leadership.



1 A: Yes.

2 Q: Are you aware of her supporting your further
3 development as potential superintendent in the
4 future?

5 A: Not aware of that.

6 Q: And Dr. Slayman did, indeed, support your
7 development, didn't she?

8 A: Come -- you'd have to put that in more
9 contextual form. In what manner, by my work
10 experience, or what I was doing in my job role
11 or?

12 Q: Were you obtaining the associate superintendent
13 position in the first place?

14 A: True.

15 Q: So in your statement, you -- or actually let's
16 talk about testimony earlier. You described
17 talking with Dr. Slayman frequently on a
18 day-to-day basis. I think you described it as
19 summons. Either you did or Dr. Winburn did.
20 Wouldn't it be fair to say that you, as
21 associate superintendent, should be working
22 closely with your superintendent?

23 A: I do. Yes.

24 Q: And that with you working on the administrative
25 staff with Dr. Slayman, you were the person who



1 she had known the longest of all the other
2 staff?

3 A: That is correct.

4 Q: She'd known you for almost 30 years at that
5 point?

6 A: How long?

7 Q: Almost 30 years. You said -- you described
8 from the '90s, I believe.

9 A: 1997, to be specific.

10 Q: It's a little under, go ahead and give or take
11 between -- a little over 25 years; that would
12 be accurate?

13 A: I'd say that would be 20 years. 20 years,
14 right?

15 Q: Well, yeah, 20. You're right. Better on the
16 math there than me at the moment. But 20
17 years?

18 A: Right.

19 Q: And she had worked closely with you as senior
20 staff longer than any other administrator on
21 the senior staff?

22 A: Not in Chester. I mean, Mr. Turner was there
23 preceding me. So she'd worked with him longer
24 as senior staff.

25 Q: What was ---



1 A: And Ms. Stroud and Ms. Williams, they were all
2 there before me.

3 Q: Well, with regard to the length of time that
4 y'all had worked together in total?

5 A: Oh, yeah.

6 Q: You indicated, I think, maybe in total about 15
7 years?

8 A: I don't even think they knew her before she
9 came to Chester, but I certainly did.

10 Q: You wrote a statement that describes -- and I
11 quote from one of the documents that you were
12 questioned about, an overwhelming environment
13 of anxiety, unease, and tension that is
14 lingering and ever present. Is that something
15 that you drafted?

16 A: It is.

17 Q: And just two weeks prior to you submitting your
18 grievance and accusing Dr. Slayman of
19 subjecting you to a hostile work environment,
20 you asked Dr. Slayman to take a vacation at her
21 home, didn't you?

22 A: I honestly do not recall that. I don't know
23 why I would have said that. I don't know. I
24 don't remember.

25 Q: You're aware of Dr. Slayman having a beach



1 house?

2 A: As -- to my recollection, she had two beach
3 condos.

4 Q: And that you had previously asked to use her
5 condo for a vacation?

6 A: I have never used her condo for a vacation. I
7 have accompanied her and her husband. I know
8 my brother did. But I don't recall ever asking
9 her to use her place.

10 Q: Well, with regard to what she's indicated to me
11 that you did ask just shortly before you filed
12 this hostile work environment complaint and
13 that she had told you, indeed, she would let
14 you use the condo.

15 **MR. WINBURN:** Objection. Witness -- the lawyer's
16 testifying.

17 If you could just rephrase the question?

18 **HEARING OFFICER:** Please rephrase the question.

19 **MR. WINBURN:** Dr. Slayman hasn't testified yet.

20 Q: It's accurate that Dr. Slayman told you at some
21 point you could use her condo for vacation?

22 A: To answer the question succinctly, I never
23 recall requesting it. But there were frequent
24 times when she would say, y'all know y'all are
25 always welcome to use one of any condos if it's



1 available, because they did rent them out.

2 Q: And you're -- from that testimony, you're
3 saying that's the same person that was yelling
4 at you and somehow intimidating you?

5 A: It is.

6 Q: And you and Dr. Slayman and both of your
7 spouses went to dinner together during this
8 time frame, right?

9 A: We went to dinner intermittently probably the
10 whole time I was in Chester when my wife
11 would -- very rarely, she would come up. I
12 rented a house there so I wouldn't have to
13 drive back late after work some days. And
14 there was occasion that we would go out to eat.

15 Q: And there were times that you attended -- you
16 and Dr. Slayman attended professional
17 conferences with both of your spouses present
18 and you would engage in social activities as
19 well; is that right?

20 A: That was before my tenure in Chester, the times
21 that we were at concurrent -- at conferences.
22 As soon as board members showed up, I would be
23 dismissed.

24 Q: Well, based on going to dinner, getting
25 together, utilizing a vacation home and a



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1 friendship that had lasted for, give or take,
2 15 to 20 years, would it surprise you that
3 Dr. Slayman was shocked to find out that you
4 had filed a hostile work environment complaint
5 against her?

6 A: I could see where she would be shocked; yes.

7 Q: Because you had never brought any of those
8 concerns to her attention before, had you?

9 A: The only thing I've said to her before was she
10 would ask me, did I come across too strong?
11 Should I not have said that? There were
12 multiple times when I would say, yeah, you
13 shouldn't have. Or like the incident when she
14 threatened to rip Ms. Williams' throat out. I
15 told her, as I stated earlier, coming from you
16 directly, I wouldn't be necessarily thinking
17 you were going to attack me physically, but if
18 it ever came up in a court of law, it would
19 look bad. That was be -- that was my statement
20 to her.

21 Q: And what you described earlier in your
22 testimony when Mr. Winburn was asking you is
23 that even at the time you knew that statements
24 that, whether they occurred or not, were being
25 taken out of context as they're put in writing;



1 is that right?

2 A: You'll have to explain to me what you mean by
3 that.

4 Q: I think you said that you didn't think
5 Dr. Slayman would actually be threatening to
6 kill somebody; isn't that accurate?

7 A: No. What I said was I didn't think she would
8 actively act on killing someone. So I
9 cautioned her in saying that.

10 Q: And you want to be superintendent, don't you?

11 A: Not at this point in my career; no, ma'am.

12 Q: But you have previously expressed intent to
13 become a superintendent; is that accurate?

14 A: I would say that would have been probably
15 before I left Chester, yes.

16 Q: And when you filed this grievance on
17 September 8th, 2015, you thought, as the second
18 in command of the district, that you would
19 become an interim superintendent, didn't you?

20 A: Absolutely not. I had no idea of that
21 whatsoever.

22 Q: On page 4 of your complaint -- and feel free to
23 refresh your recollection -- you say, I like to
24 think that I'm ready to be a superintendent and
25 will have any own district one day. That fear



1 I have -- excuse me. The fear I have -- have
2 it at that -- well, it's a little confusing
3 phraseology. I might have a typo. But the
4 fear I have is that she won't let me leave or
5 will block me from leaving.

6 **HEARING OFFICER:** What ---

7 Q: Is that testimony that you provided in -- and
8 I'll give you time to look at it on page 4.

9 **HEARING OFFICER:** What exhibit is this?

10 **MS. POLVI:** That's Exhibit 13 from the agency's
11 submittal.

12 A: I'm not seeing it. I'm sorry.

13 **MR. WINBURN:** Number 4 at the top that I circled.
14 It has the handwritten King on the top of it.

15 **MS. POLVI:** Oh, okay.

16 **MR. WINBURN:** Number 4.

17 A: Okay. Got you. What -- I'm sorry. Did you
18 ask a question?

19 Q: You made that statement within your complaint
20 of a hostile work environment with regard to
21 Dr. Slayman, did you not?

22 A: I did.

23 Q: And you've applied for multiple superintendent
24 positions, correct?

25 A: I have.



1 Q: One of those is where Keith Callicutt was doing
2 a search in February of 2015?

3 A: He was doing a search?

4 Q: With regard to Florence 2 School District?

5 A: I was not aware that he was doing the search.
6 I only had dialogue directly with the chair of
7 that school board then. I do not recall his
8 name.

9 Q: And you applied for the superintendent position
10 in Florence 2?

11 A: Florence 2?

12 Q: That's correct.

13 A: I did.

14 Q: And you did not receive the job; is that
15 accurate?

16 A: That's the one that Callicutt was at?

17 Q: Correct.

18 A: Yeah. I was a finalist. That's correct.

19 Q: And you blamed Dr. Slayman for you not getting
20 the job?

21 A: I won't say I explicitly blamed her, but I felt
22 like she intervened 'cause she kept -- she told
23 me that she was having dialogue with that
24 chairperson about some initiatives they were
25 doing there, which I did not think that was



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1 appropriate.

2 Q: Were you aware of Dr. Slayman actually
3 supporting your application?

4 A: I was not.

5 Q: Were you aware of her discussions with the
6 Chester County School Board how to plan your
7 replacement, assuming that you were gonna get
8 that job?

9 A: I did not know that.

10 Q: Wouldn't that show her good faith belief that
11 you would get hired?

12 **MR. WINBURN:** Objection. Facts not in evidence.

13 **HEARING OFFICER:** Please rephrase your question.

14 Q: If you had known that Dr. Slayman was
15 supporting your efforts to find alternative
16 employment as a superintendent, would you have
17 still filed this hostile work environment
18 complaint?

19 A: I would say I would have, considering all the
20 incidents and the culminating events that kept
21 just piling up.

22 Q: In Florence 2, which you'd indicated you were
23 finalist for the superintendent position, ended
24 up promoting someone from within, didn't they?

25 A: To my knowledge, it was an existing staff



1 member, yes.

2 Q: Let's talk about connections with regard to
3 Keith Callicutt. He was the person who you
4 believed would help you get the job in Florence
5 2, right?

6 A: I did not know Dr. Callicutt during that time.
7 I only -- the first time I ever met
8 Dr. Callicutt was when he met me at the door
9 for me to let him into Chester office when he
10 was serving as interim.

11 Q: And he's the person that ended up becoming the
12 interim superintendent for Chester County
13 School District after Dr. Slayman, correct?

14 A: I was acting superintendent for a very short
15 time, but he was named as interim. That is
16 correct.

17 Q: And did you want to continue acting as
18 superintendent?

19 A: I did not. I never expressed that to anyone.
20 I actually thought that by virtue of this
21 grievance, it would quell any chance I would
22 ever have anyway, but I did not want to be
23 superintendent there. There were times when
24 Dr. Slayman had applied in other places. She
25 said, you know you'll get this job. And I



1 said, well, if it happens, it happens. But
2 that was preceding this.

3 Q: And Keith Callicutt submits a complaint to the
4 Department of Education in October of 2015.
5 Were you involved with that complaint filing?

6 A: I was not involved with that. I did not know
7 he was doing that.

8 Q: Did he asking about any of your knowledge with
9 regard to the accusations?

10 A: He asked all senior staff what -- not -- I
11 won't say explicitly what had happened but what
12 had caused Dr. Slayman to be gone.

13 Q: How did you respond?

14 A: I don't ever lie. I told him the truth. I
15 said there were some issues internally. There
16 were some allegations of hostile work
17 environment and threatening remarks, and the
18 board dealt with it.

19 Q: Were you present when the other individuals,
20 the senior staff that you're referring to, had
21 the conversation with Keith Callicutt about
22 Dr. Slayman?

23 A: I do not recall honestly. I mean, he held
24 senior cabinet meetings just like Dr. Slayman
25 did, like most superintendents do. I won't



1 deny there may have been discussions among us
2 as to what we could do to make things better to
3 improve morale, but I don't recall ever any --
4 Dr. Callicutt, if you know him personally,
5 never, never have heard him speak a derogatory
6 word about anyone.

7 Q: With regard to your complaint, your references
8 throughout it, show that you were motivated by
9 a perception that Dr. Slayman was holding you
10 back with your career; would you agree?

11 A: I felt that way to an extent; yes.

12 Q: And in your statement on page 4 as well, and I
13 quote parts of it. It says, at that point, she
14 stated that if I would stick with her, she
15 would get my money right by summer 2015.
16 Obviously this has not happened. So your
17 complaint comes right after a time frame you
18 thought you were gonna get a pay raise?

19 A: She stated to me when I did not get the
20 Florence job. She actually said it before I
21 knew I did not get the Florence job that I'll
22 be happy for you if you get it. But if you
23 don't, just know that we're gonna make your
24 money right. She said that from the time I was
25 hired that my salary would be elevated to



1 what's more appropriate for someone in my
2 capacity.

3 Q: And what was your salary at this time frame of
4 summer 2015?

5 A: I'd probably say low 90s.

6 Q: And earlier in your testimony, you talked about
7 when you were involved, you and Mr. Gardner
8 were involved with the responsibility of
9 interviewing the selection of the chief of
10 security. Do you recall that?

11 A: I do.

12 Q: And you said it was alarming to you -- along
13 some lines similar to that -- that the pay
14 wasn't already allocated for when you were
15 interviewing. When you've interviewed other
16 people, isn't it fair to say that salaries
17 aren't set at times when interviews are
18 occurring?

19 A: Well, actually the pay was set. It was posted
20 at 38,000. It was. What was perplexing to me
21 was that we were not given the leeway to tell
22 the candidates if they were district employees
23 or Defender employees. And at least two of
24 those candidates said, well, I don't know if
25 I'd get the job or not, but I'd need to know



1 that 'cause it makes a difference. Defender
2 paid no benefits.

3 Q: And when we consider that you're the associate
4 superintendent of curriculum, it wouldn't be
5 your job to set the pay of a chief of security;
6 is that right?

7 A: That is correct.

8 Q: It would be the school board, Dr. Slayman, and
9 the finance director?

10 A: That is correct. Probably not even the finance
11 director. I guess that role would be to just
12 say it -- is the money there to allocate. It
13 would be superintendent and the board.

14 Q: And this pay ultimately ended up, I think you
15 described, as being in the 60s still
16 significantly lower than your salary. Why
17 would that salary alarm you for someone who's
18 in a chief type of position within the
19 district?

20 A: The salary level itself wasn't what was
21 alarming. What was alarming was that the base
22 pay was cited in the posting at \$38,000. When
23 the person got hired that Dr. Slayman wanted to
24 be hired, Ms. Williams was directed in front of
25 me and Mr. Gardner to up his salary to the 60s



1 so that he would draw \$38,000 a year. The base
2 salary in the posting was 38,000, which means
3 he would probably have drawn in the low 30s,
4 upper 20s.

5 Q: I know you've indicated ---

6 A: He said he would not take the job for that.

7 Q: And as you indicate again, this is a job
8 posting for inquiry purposes -- the salary's
9 not set 'til someone's hired; isn't that
10 accurate?

11 A: In my mind, if I hire a teacher and the salary
12 said at \$32,742 in the posting, that's what
13 they get hired for. It's based on their
14 tenure, their level of experience, and degree
15 level.

16 Q: And I'm not gonna have us go too long around
17 this circle, but fair to say it was not your
18 decision to make pay decisions about chief of
19 security?

20 A: That is correct.

21 Q: In your statements written as well as testimony
22 that you provided today, you blame Dr. Slayman
23 for fractured community relations with the
24 sheriff's office; is that accurate?

25 A: Yes.



1 Q: Did that prompt your support -- of the
2 sheriff's office prompt your hostile work
3 environment complaint?

4 A: My support of the sheriff's department?

5 Q: Yes.

6 A: I never showed any -- I don't know what you
7 mean by support. Like, did I contribute to his
8 campaign? I mean, I've always been a supporter
9 of law enforcement. I was perplexed as to how
10 we could block the sheriff of the county from
11 coming into our schools to help keep our kids
12 safe.

13 Q: And there was nothing every submitted in
14 writing to the sheriff's office telling them
15 that they couldn't come to schools; isn't that
16 accurate?

17 A: I have no knowledge of that. To my knowledge,
18 no. I don't know.

19 Q: And you testified already during your testimony
20 earlier that principals had already brought the
21 concerns to you and to Dr. Slayman that they
22 were concerned that sheriff's office employees
23 were showing up unannounced at schools; isn't
24 that accurate?

25 A: Yeah. They were upset because sheriff's



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1 department employees were coming in finding
2 doors unlocked in the back of the school, on
3 the side of the school, and that kind of stuff.
4 And they -- and the sheriff expressed you need
5 some -- to revamp your protocols regarding
6 locking your schools down and keeping external
7 doors confined to the main entranceway.

8 Q: And you testified quite a bit about Defender
9 and the security company that was hired to take
10 over school security for Chester County School
11 District. That's a board decision; isn't it?

12 A: The ultimate contract of that, you mean?

13 Q: Yes.

14 A: Yes.

15 Q: And the board voted as a body to change
16 security from the sheriff's office to Defender;
17 is that right?

18 A: That is correct.

19 Q: And that you and every other person who works
20 for the school district is responsible for
21 following through with the decisions of the
22 board?

23 A: That is correct. And we did.

24 Q: And when Defender was placed into security,
25 isn't it accurate that they have placed a



1 security officer at every school, whereas when
2 the sheriff's office only had a security
3 officer at the high schools; isn't that
4 accurate?

5 A: I'm gonna have to say when Defender was hired,
6 to my knowledge, they did place someone at
7 every school. I can't honestly recall if a
8 sheriff's person was at just high schools.
9 They may have also have been at middle schools,
10 and I think they were at middle schools but not
11 at elementary. But that's -- I mean, I'm old.
12 My memories fade some, so I don't quite recall.

13 Q: And with regard to testimony about, I think,
14 what's been described as a breakfast club --
15 and I'll just use the same terminology for ease
16 of questioning -- you went to the breakfast
17 club on an occasion, right?

18 A: One time.

19 Q: And Dr. Slayman had welcomed you to be present
20 at other times if you wanted to?

21 A: Yeah. She'd say you ought to come to breakfast
22 sometime.

23 Q: And that's the same person that you're saying
24 subjected you to a hostile work environment?

25 A: I think that Dr. Slayman's interest for me



1 being there was to get me more in the loop with
2 what those guys were directing her to do. And
3 I did not like the agenda. So that's why I did
4 not go.

5 Q: And from one breakfast, you ascertained that
6 these individuals who had breakfast with
7 Dr. Slayman were somehow directing everything
8 that's happening in the school district?

9 A: That one breakfast, when I would hear these
10 gentlemen say that black boy running for
11 sheriff, that was enough for me. I don't have
12 that in me to tolerate that. The other times
13 Dr. Slayman would come back to the office and
14 tell me and Mr. Gardner what her advisors told
15 her we needed to be doing.

16 Q: And with the reference to race that you just
17 made, who are you testifying as who you're
18 saying said that?

19 A: One of the members of her breakfast club.

20 Q: Who?

21 A: I don't know -- I did not know their names.

22 Q: Were you present?

23 A: I knew two of them. I heard one of them say
24 that, yes.

25 Q: But it wasn't Dr. Slayman that made any type of



1 statement like that?

2 A: I never heard her say that at the breakfast
3 that day.

4 Q: And Chester is a relatively small community; is
5 that accurate?

6 A: If I recall, it had about 6,000 kids, 11
7 schools, I think, maybe 12.

8 Q: And civic activities, education, fire
9 department, police department are frequently
10 interconnected because of the size of the
11 community; is that right?

12 A: Best case scenario, yes.

13 Q: I want to ask you about testimony that you gave
14 about time off. Dr. Slayman never denied any
15 time off request you ever submitted; is that
16 accurate?

17 A: That is true.

18 Q: And she, at no time, instructed you that you
19 had to come back to work at any time when you
20 were off?

21 A: She did not. Her exclamation to me and
22 Mr. Gardner, to both of us together was that if
23 she ever called us and we did not answer, 24
24 hours a day, seven days a week, 365 days a
25 year, we are to call her back within five



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1 minutes. That was our charge.

2 Q: And as second in command to the school
3 district, aren't you, if Dr. Slayman's not
4 available, the person responsible for the
5 entire school district? Wouldn't you need to
6 be on call?

7 A: I would say when I'm on my personal leave time
8 or at my brother's funeral or some semblance
9 thereof, there has to be some exclusions from
10 that. Especially if she's in district or -- I
11 have no problem being responsible. Never have
12 had that. But there are times when you've got
13 to get away. But I never did not refute her
14 direct, but I always called her back. And I do
15 understand the importance of being in the role
16 I was in. Took it very seriously.

17 Q: And I am sorry for your brother's, loss and I
18 have to follow up about his passing with regard
19 because you brought it as something ---

20 A: It's okay.

21 Q: --- connected to this case. Is -- isn't it
22 accurate that Dr. Slayman expressed her
23 condolences to you?

24 A: When I talked to her the first time after my
25 brother died, she asked if it was my other



1 brother, who she was friends with. And I said
2 no. And she said, oh, okay. She never told me
3 she was sorry my brother died. She did come to
4 the visitation.

5 Q: And that was gonna be my next question is: She
6 came to the funeral, didn't she?

7 A: I don't recall if she came to the funeral or
8 not. I know she came to visitation.

9 Q: And that's nothing she had to do?

10 A: And she may have. I don't know. I don't
11 remember.

12 Q: That's something she didn't have to do? She
13 chose of her own volition to come to pay
14 respects; is that accurate?

15 A: If she was there for that, yes, I would suspect
16 you are right.

17 Q: Now, I want to ask you some questions about the
18 senior leadership within the district. The
19 grievance that we see marked as the Agency's
20 Exhibit 8, it's the one that you were asked
21 about earlier in your testimony, and there's
22 signatures of you, Jeff Gardner, Ms. Williams,
23 Ms. Stroud, and Ms. Clinton. Those are five of
24 the six senior staff, I think you testified to
25 that effect?



1 A: I would again say that I don't know that
2 Ms. Ligon was referred to as senior staff. She
3 was obviously essential staff, but she wasn't
4 considered a part of the superintendent's
5 cabinet.

6 Q: And if you'll look at the -- I think it might
7 still be handy in front of you -- but looking
8 at the grievance document ...

9 A: Yeah. I got it.

10 Q: You're name is the first one listed.

11 A: Uh-huh.

12 Q: Did you draft this document?

13 A: We talked and drafted it together.

14 Q: So the five of you met together and typed this
15 document together?

16 A: Each of us said, you know, are we gonna do
17 this. Nobody wanted to do it, then like we're
18 gonna die if we don't. So we all came together
19 at some point in time and -- after hours, just
20 saying we've got to do something or we're
21 gonna -- we're not gonna survive this
22 environment. I don't recall -- I mean, that --
23 honestly speaking, that looks like my verbiage.

24 Q: And with your name being listed, my assumption
25 was that you were the person that typed it up



1 and the first to sign in terms of the order.
2 But is that your recollection that you were the
3 individual to type it up?

4 A: Maybe. I don't remember directly. I remember
5 us talking.

6 Q: And I note that your signature is in different
7 ink from that of the other four signatures.
8 Did you sign this document when the other four
9 individuals were present or at some other time?

10 A: As I recall, we signed it all at the same time.
11 But back in that time, this is my pen
12 (indicating). I only used this pen for about
13 25 years, so that's why it would be black ink.
14 I have no reasons to know why the others are in
15 blue unless they all had the same pen or passed
16 around the same pen.

17 Q: And who told you what the process was for
18 filing the grievance?

19 A: I did not -- never received any advice for
20 that.

21 Q: And the document ---

22 A: And well, let me reflect back. I think any
23 educator would know that if you have an issue
24 with a supervisor, then you send your concerns
25 to the person over you -- over that person,



1 rather. So for this group, it would be the
2 board. For me as a principal, it would be, I
3 assume, the board as well.

4 Q: And date on this indicates it's September 8th,
5 2015. And to -- the person to whom it is
6 addressed is Denise Lawson, the board chair.
7 Had you talked to Denise Lawson about this
8 before this dated document?

9 A: No, ma'am.

10 Q: So how did it get into the hands of Ms. Lawson?

11 A: I honestly don't recall. I don't remember. I
12 do not know. By virtue of having her private
13 address, it may -- it might may have been
14 mailed. I don't remember.

15 Q: So after you signed this document, what
16 happened next?

17 A: Ultimately, it was received by Ms. Lawson and
18 certainly created a stir, as we understand. We
19 had an opportunity at some point later -- I
20 don't recall the date -- where Childs &
21 Halligan were charged with, I guess, providing
22 oversight to the grievance process. We met
23 with -- there was a -- there is a room in the
24 Chester district office. It's a tiered -- kind
25 of like a lecture hall that was for staff



1 development, and we were brought in and lined
2 up across the bottom. And the board members
3 were on the second tier looking down at us.
4 And at that point, we had requested and
5 received assistance from the SCEA who appointed
6 Mr. Al Nichols representing attorney for us,
7 and he was present. And we were -- at that
8 point, the board questioned us about what all
9 this was about, why it arose this way, and
10 that's kind of how it evolved. Ultimately,
11 Dr. Slayman was put on leave as a result of the
12 grievance in process.

13 Q: And how do you know that she was put on leave?

14 A: Because she didn't come to work. And she
15 called me that night. When I was on my bike
16 trainer, as I said earlier, to tell me she'd
17 been put on leave. She prefaced it by saying,
18 I'm not supposed to be talking to anybody. Do
19 you know why -- did you know I was put on
20 leave? Do you know who did it?

21 It wasn't a long conversation. I was very
22 short. I don't mind. I was not rude. But at
23 that point, I was told not to have any dialogue
24 with her either at that point.

25 Q: And wasn't the context of the call related to



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1 her calling you as a friend, that she never
2 even thought that you could have been the --
3 one of these people who's complaining about a
4 hostile work environment?

5 A: I don't know what her temperament was via
6 telephone. I don't know.

7 Q: Didn't she ask you what you thought she should
8 do?

9 A: I don't remember if she -- if she did, I would
10 have told her just let the process work out.

11 Q: So let's talk about this time frame that leads
12 up to this complaint. You were trying to
13 actively advance your career at that time,
14 right?

15 A: At some point, I hoped that would happen; yes.

16 Q: And you had told Dr. Slayman that you were
17 doing the majority of Jeff Gardner's job,
18 right?

19 A: I never said that. I did the majority of Blair
20 Turner's job because he was out sick for most
21 of the year before he passed away.

22 Q: And you had told Dr. Slayman that you were
23 doing the majority of the supervision that Jeff
24 Gardner should be doing?

25 A: I don't ever recall saying that.



1 Q: You told Dr. Slayman that Bobby Roddey, Tressa
2 Harrington, and the principals preferred to
3 report to you rather to Jeff Gardner?

4 A: I don't ever recall saying that.

5 Q: You told Dr. Slayman that you were dealing with
6 all the attendance issues of the employees
7 under Jeff Gardner?

8 A: I don't recall saying that, nor do I recall any
9 attendance issues for those reporting to Jeff.

10 Q: And you told Dr. Slayman that you should be put
11 over Jeff Gardner, Brooke Clinton, Anna Stroud,
12 and Shawn Williams, didn't you?

13 A: I never said that. Dr. Slayman did say at some
14 point she planned to reorganize the structure
15 of the organizational chart. And she alluded
16 probably for the last year she was there that
17 she wanted to relegate from her or delegate to
18 me some of the responsibilities for principal
19 oversight. In other words, they would report
20 to me and her instead of just her. But I never
21 said I should be in charge of everybody.

22 Q: So is it ---

23 A: And I kind of was anyway.

24 Q: So it is your testimony that you did not
25 propose a restructuring where only you and the



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1 secretarial staff would report directly to
2 Dr. Slayman and all of the other senior
3 leadership would be under your supervision?

4 A: I never said that. I don't know why I would
5 say that. I had enough to do already. I
6 always felt like -- and the stress we dealt
7 with, I mean, it's a high-stress job. We're
8 talking about the education of over 6,000 kids.
9 That was enough on my plate.

10 Q: And if such a restructuring occurred, it would
11 mean that essentially IT, finance, HR, and the
12 public information office would have been under
13 your leadership, a demotion for them?

14 A: I don't think that she would have ever allowed
15 the PR office to be under me. She liked having
16 that under her. There was always talk back and
17 forth as the district evolved with the
18 one-to-one initiative. There was a line
19 between me and Mr. Gardner. He was kind of
20 known as the hardware side of the IT director
21 reporting to him. I was kind of known as the
22 software side, but the IT director reported to
23 me because I was over a voluminous amount of
24 electronic learning programs that you may be
25 familiar with or at least know what I'm talking



1 about. But there was often talk of -- that
2 Mr. Rollins, who was the IT director, should
3 either be under Jeff or me so he didn't have to
4 go back and forth between the two to get
5 decisions made. And he ultimately ended up
6 reporting to Mr. Gardner.

7 Q: Earlier in your testimony during the direct
8 examination, you referred to that -- the people
9 most frequently in Dr. Slayman's office were
10 you and Jeff Gardner. Do you recall that?

11 A: Yes.

12 Q: Do you recall that during some of those times,
13 you and Jeff Gardner also proposed jointly a
14 restructuring to divide additional leadership
15 again to have HR, finance, and the PIO spread
16 between under both of your leaderships?

17 A: The only recollection I have was talking about
18 IT and that it was creating a tenuous situation
19 for the IT director who's very astute, very
20 knowledgeable. But he came to me and Jeff
21 together and said, I really need just one
22 go-to, one person, rather than having to --
23 because it was so intermingled. You got to
24 where you couldn't separate the two. The
25 hardware versus software side. We did approach



1 her about that.

2 Q: You approached Dr. Slayman proposing the
3 supervise Shawn Williams?

4 A: I don't ever recall doing that.

5 Q: And you approached Dr. Slayman proposing to
6 supervise Anna Stroud?

7 A: I don't ever recall doing that. And know -- I
8 don't know that I would have proposed that
9 because I knew that that would not happen
10 anyway.

11 Q: And you approached Dr. Slayman proposing to
12 supervise Brooke Clinton?

13 A: Never would have done that either. It didn't
14 make sense.

15 Q: You say it doesn't make sense, but yet it would
16 advance you as being the second -- further
17 second in command within the district or the
18 other senior staff would report to you, thus
19 increasing your position, and other peoples
20 would essentially be a demotion.

21 A: Well, I guess what I mean by I don't -- I
22 didn't think that would ever happen, I didn't
23 never -- I would never have thought that
24 Dr. Slayman would have relinquished that to me
25 anyway if I had -- even if I had wanted.



1 Q: And did you tell Shawn Williams that
2 Dr. Slayman was seeking to somehow eliminate
3 her from her job?

4 A: There were more times than I could count when
5 I would just be in dialogue with Dr. Slayman
6 directly, and I recounted this in my notes at
7 some point, you know, did I make a mistake
8 hiring Jeff? Do we need to try and find a way
9 to get rid of Jeff? After Ms. Williams got
10 upset about Dr. Slayman's threat, it was a
11 constant, I don't think Shawn's doing her job.
12 Should we get rid of her? It was -- that was
13 just ongoing. It was commonplace.

14 Q: And you told Shawn Williams that Dr. Slayman
15 was trying to fire her?

16 A: I never said that to Shawn Williams.

17 Q: You told Shawn Williams her job was at risk?

18 A: I probably would have said to Shawn, as a
19 member of the senior cabinet, you better -- you
20 know, you better mind your Ps and Qs. I don't
21 ever -- I don't recall ever telling her her job
22 was in jeopardy or that she was going to get
23 fired.

24 Q: And you told Anna Stroud that her job was at
25 risk?



1 A: I never told Anna that. I was never close to
2 Anna to tell her something like that. But
3 Dr. Slayman often said she was gonna get rid of
4 Anna. Anna's out. Maggie James hates Anna.
5 We need to get rid of Anna. And to Anna's
6 credit, she always had unqualified audits. Her
7 books were always in order. I thought she was
8 a good bookkeeper. She was -- her -- my
9 biggest complaint with her was that she'd
10 sometimes take a while to get information from
11 her or deadline information 'til the last
12 minute, but she was always very adept at her
13 job, in my opinion.

14 Q: You complained to Dr. Slayman that Anna Stroud
15 wasn't qualified for her job?

16 A: I never said that. Dr. Slayman told me that.
17 Evidently, I don't know if Ms. Stroud even had
18 a degree. She was certainly -- if she had a
19 degree, she was not a CPA. Dr. Slayman
20 expressed often to me she'd rather have a CPA
21 or somebody with better credentials to serve in
22 that role.

23 Q: And you informed Anna Stroud that that's what
24 you believe Dr. Slayman was saying about her?

25 A: I did not have to say that to Anna. She



1 already knew it.

2 Q: But you had discussions to that effect with
3 Anna Stroud?

4 A: I did not. Not that.

5 Q: How do you know she knew it?

6 A: She told me.

7 Q: So you had conversations with her about it?

8 A: She told me that. I -- well, you asked me if
9 I told her that. I did not. She told me that.

10 Q: And with regard to Brooke Clinton, you had
11 conversations with Brooke Clinton about how her
12 job was somehow threatened?

13 A: I didn't have to have that conversation.
14 She -- Dr. Slayman openly threatened her
15 position. If I did anything, I consoled her,
16 because I thought she did an outstanding job.

17 Q: And with regard to Jeff Gardner, you and Jeff
18 Gardner had conversations about how somehow
19 Dr. Slayman was gunning for his job too?

20 A: He expressed to me on multiple occasions she
21 thought he was walking a gangplank. He always
22 felt that he was targeted.

23 Q: So let's put this all in context for the time
24 frame. So we look at your complaints are
25 September 8th, 2015. You still had a job and



1 had not been written up by Dr. Slayman, right?

2 A: Not to my knowledge. I had not been written
3 up.

4 Q: And Mr. Gardner still had his job as of this
5 date that you signed the documents together,
6 right?

7 A: Uh-huh. That is correct. I'm sorry. Yes.

8 Q: And Ms. Williams still had her job?

9 A: Yes.

10 Q: And Ms. Stroud still had her job?

11 A: Yes.

12 Q: And Ms. Clinton still had her job?

13 A: Yes. Notably, I should add, we were all trying
14 to get out of there. We'd had enough. And
15 interestingly enough, none of us are there any
16 longer.

17 Q: And all of you were there as of the time
18 Dr. Slayman left her job?

19 A: That is correct.

20 Q: And you, Jeff Gardner, Shawn Williams, Anna
21 Stroud, and Brooke Clinton were all motivated by
22 fears that somehow your jobs were in danger
23 when you filed your hostile work environment
24 complaint?

25 A: I wouldn't necessarily say it was that. I



1 mean, I -- you know, I -- obviously, I got
2 berated, belittled. You know, I like to think
3 I have a thick skin. I've been in politics.
4 I've been in the military. I served under a
5 lot of people. Our inclination was that the
6 district morale was very, very low. I had
7 principals who confided in me that they felt
8 like they could never do right; nothing they
9 ever did was good.

10 And because of the workplace and the way we
11 felt, that was the driver. It -- I don't -- I
12 never thought about my job being in jeopardy.
13 I feel like I'm a protector. That's my nature
14 as a human being as my personal matrix. My
15 looking out for the best interest of others was
16 what I strived to do, and I still do that. I
17 felt like the district was in disarray,
18 demoralized, and that people had had enough of
19 that behavior.

20 Q: And that's what prompted you to lead to get a
21 group of people together to file a complaint
22 against Dr. Slayman?

23 A: I never led that process. I was not the lead
24 of that process.

25 Q: Then who was?



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1 **THE WITNESS:** Is that okay for me to answer that
2 question?

3 **MR. WINBURN:** Sure.

4 A: It was Mr. Gardner.

5 Q: Okay. And what did he -- Mr. Gardner say to
6 you that prompted you to believe that?

7 A: And say to me in what? What do you mean?

8 Q: To lead the effort to get complaints against
9 Dr. Slayman.

10 A: Well, after day after day, week after week,
11 month after month, his health declined. He
12 said, man, we got to do something. She's
13 killing all of us. And I said I can't dispute
14 that. I mean, at that point, I had developed
15 stomach ulcers. At that point, he was seeking
16 medical treatment. At that point, Ms. Stroud
17 was undergoing medical treatment. I feel like
18 the driver with Mr. Gardner was he was at a
19 breaking point and he recognized that we were
20 all at a breaking point.

21 We're at the threshold of not knowing -- none
22 of us could do right. There was always a
23 constant air of what's coming next. What she's
24 gonna get mad at somebody about next? And I
25 ultimately agreed. I don't mind telling you,



1 I was the holdout. Because I knew from where
2 I sat, if I were involved in this, knowing that
3 I would love to have an advancement in my
4 career at some point in time, that by signing
5 my name on this, I would be done, that either
6 the Chester job or a lesser job would be
7 terminal for me.

8 Q: When we look at this document, September 5th,
9 2018, start of the school year, not a
10 single ---

11 A: Which document, ma'am?

12 Q: Looking at your grievance signed by you,
13 Gardner, Williams ---

14 A: I've got the eighth on this one.

15 Q: --- Stroud and Clinton.

16 A: The 8th. Did you say the 5th?

17 Q: September 8th, 2015.

18 A: Okay.

19 Q: This document (indicating). We're looking at
20 the beginning of a school year. Not one of you
21 discussed with Dr. Slayman any of this before
22 filing a complaint trying to get her fired;
23 isn't that true?

24 A: Other than me saying to her when she would ask
25 me, did I come off too strong? Should I not



1 have said that? I think she was unsuspecting
2 of what was coming; yes.

3 Q: If you felt you were such a united front, why
4 wouldn't you just sit down as a group and talk
5 to Dr. Slayman about it, say, hey, we have
6 concerns. Let's try to work on them.

7 A: If you had worked for her and knew the tone and
8 the demeanor she had developed over time, you
9 would not have done it either. We all agreed
10 it would not help.

11 Q: And when you filed this grievance, what was
12 your motive? What were you seeking to get from
13 this grievance process?

14 A: You know, honestly speaking, I don't know that
15 that was ever considered. I don't know what
16 the next step was. I don't know. I don't --
17 I can't say it was to get her fired or to get
18 her some training or to revamp the system. I
19 don't know what the motive was. The motive was
20 is that we were breaking. And the district was
21 breaking, and we couldn't move forward, and we
22 were stifled, and we needed help.

23 Q: And the result was, less than a month later,
24 Dr. Slayman's no longer in the job and you're
25 acting superintendent, right?



1 A: It was made known to me by Ms. Lawson that my
2 role was temporary until they could find an
3 interim. But, yes, you are right.

4 Q: So just prior to this ---

5 A: And may I add -- may I?

6 Q: Sure.

7 A: She also told me that the only reason I was
8 named as interim was because I was the only one
9 in that building with a superintendent
10 certification. So I was technically, by virtue
11 of qualification, so to speak, I was the only
12 one -- I don't know if it's legal. Do you have
13 to legally be licensed as a superintendent to
14 be one? I don't know. But she told me that.

15 Q: And when we look at this time frame of -- on
16 the Exhibit 8, September 8th, 2015, just prior
17 to that, Dr. Slayman had come to you with
18 concerns, didn't she?

19 A: I don't recall. You'll have to be more
20 explicit.

21 Q: Sure. Dr. Slayman was concerned that you were
22 wrongfully getting free Internet through the
23 district. She had told you that, didn't she?

24 A: That I was getting Internet through the
25 district?



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1 Q: Yes.

2 A: I was not.

3 Q: Did she express concerns to you that you were
4 using the Mi-Fi system that you should not be
5 using?

6 A: She never expressed concern about that. I
7 borrowed a Mi-Fi that was not being used.

8 Q: So ---

9 A: And that was in lieu of -- which was okay with
10 her. I did not have a district cell phone, so
11 the agreement was prior to that, the Mi-Fi,
12 which was less than a cell phone would have
13 been was my cell phone, so to speak, so that I
14 would have access to Internet when I was
15 staying at the house I rented in Chester so
16 that I could do work in the evenings.

17 Q: So yes or no: Did not Dr. Slayman, at the end
18 of the summer 2015, confront you about
19 wrongfully using the Mi-Fi system?

20 **MR. WINBURN:** Asked and answered.

21 A: I don't recall that. And I think I would
22 recall that if that had happened.

23 Q: And you admitted to her that you were using it
24 at the rental house?

25 A: If she inquired about the Mi-Fi device? I



1 would have had no reason not to admit it. She
2 already knew it.

3 Q: And Dr. Slayman told you that it was not
4 appropriate for the district to be paying for
5 you to receive Internet access for personal
6 gain?

7 A: I don't recall ever recall her saying that to
8 me.

9 Q: And Dr. Slayman informed you that she had
10 reported those concerns to the school board?

11 A: Absolutely not.

12 Q: And you lodged this complaint ---

13 A: Absolutely not.

14 Q: And that you filed this complaint against her?

15 A: Absolutely not. That's asinine. I don't -- I
16 would have not have done that anyway. I'm --
17 I was always astute about that kind of stuff.

18 Q: So are you aware of Anna Stroud reporting to
19 Dr. Slayman that you were having an affair with
20 one of subordinates?

21 A: Say that again now?

22 Q: Are you aware of Anna Stroud reporting to
23 Dr. Slayman that you were having an ---

24 MR. WINBURN: I'm going to object. What foundation?

25 MS. POLVI: This is most definitely relevant.



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1 **HEARING OFFICER:** Ask the question and we'll see.
2 Let's get her get it out.

3 Q: Are you aware of Anna Stroud, one of the other
4 complainants in this document, reporting to
5 Dr. Slayman that you were having an affair with
6 a subordinate?

7 A: It was never ---

8 **HEARING OFFICER:** Wait.

9 **THE WITNESS:** I'm sorry.

10 **HEARING OFFICER:** Tell me how this is relevant to
11 this case?

12 **MS. POLVI:** Most definitely. Is that individual,
13 this witness, Dr. King and the individual to
14 whom is allegedly involved with this affair,
15 Kelly Lunsford-Thomas, were both just recently
16 reprimanded by the Department of Education
17 for ---

18 **MR. WINBURN:** That's not true.

19 **MS. POLVI:** --- for their actions. And it most
20 definitely goes to credibility of the witness.

21 **MR. WINBURN:** It is not true.

22 **MS. POLVI:** It's a public reprimand.

23 **MR. WINBURN:** And I'm an officer of the court. I'm
24 telling you that's not true. He was not
25 reprimanded.



1 MS. POLVI: I'm happy to -- we can take a pause and
2 I -- it's on the public record.

3 MR. WINBURN: Okay. We could -- if you'd like to.

4 HEARING OFFICER: Let's go off the record for just a
5 moment.

6 (Off the record.)

7 HEARING OFFICER: I'm gonna allow the question and
8 let him answer it, and then we'll go from
9 there.
10 All right.

11 Q: Are you aware of Anna Stroud reporting to
12 Dr. Slayman that you were having an affair with
13 one of your subordinates, specifically Kelly
14 Lunsford-Thomas.

15 A: I can tell you I am aware that Ms. Stroud
16 brought a concern to Dr. Slayman, and I know
17 exactly what you're talking about. And it was
18 not in 2015. In the late winter, early spring
19 of 2013, I still owned my gym. I owned it as
20 I worked with Chester for a short while. I
21 took a -- an airline trip to Columbus, Ohio, to
22 the Arnold Classic. It's a second tier --
23 second only to Mr. Olympia. And a client of
24 mine was a competitor.
25 My wife came up that evening to stay at the



1 house I was renting so that she could transport
2 me to the airport. That next day, which was
3 when I took -- my wife took me to the airport,
4 Ms. Lunsford-Thomas, unbeknownst to me, called
5 in sick 'cause she knew I would not be there.
6 I do not recall or I don't know right now who
7 she called to tell she was gonna be out sick.
8 But I was made -- when I came back from my
9 trip, Dr. Slayman called me into her office and
10 said, this trip you went on, how did you get
11 there? Well, I flew. No. Who took you to the
12 airport? And I said my wife. Wendy? I'm
13 like, yeah, my wife. And she said, well, Anna
14 said that she thought Kelly might have taken
15 you 'cause Kelly was off. And I said
16 absolutely no, ma'am. My wife took me to the
17 airport. That's the extent of knowledge I had
18 about that. And, again, that was in early
19 2013.

20 Q: Well, based on that testimony, it seems that
21 you do agree that Dr. Slayman questioned you
22 about concerns that Anna Stroud had brought to
23 her attention?

24 A: I -- in those terms, yes.

25 Q: And after ---



1 A: I mean, why would Kelly have driven me to the
2 airport? I don't know.

3 Q: And after Dr. Slayman brought those concerns to
4 your attention, later there's accusations that
5 Kelly Lunsford-Thomas used your log-in in order
6 to falsify certain certificate documentation;
7 is that accurate?

8 A: I forwarded a link to her. It did not have any
9 log-in or password information but, yes.

10 Q: She used your log-in to indicate that she'd
11 completed coursework to be an administrator and
12 completion of a degree from a university when
13 she had not?

14 A: She used a link that I forwarded to her. It
15 did not have a log-in. And it was forwarded to
16 her under the auspices of her checking her
17 status. I never had knowledge of her modifying
18 records.

19 Q: And Kelly Lunsford-Thomas had also completed a
20 suicide prevention course required by State
21 department regulations in your name, didn't
22 she?

23 A: A suicide prevention course?

24 Q: Yes.

25 A: I don't recall that.



1 Q: Are you say that she did not?

2 A: I'm saying I don't know one way -- I don't
3 recall one way or the other. Would that be
4 something that the State department requires or
5 a -- I don't know if it was a course she wanted
6 to take or I don't know. I have no
7 recollection of that.

8 Q: For your coursework that you're required. Is
9 it, you as an associate superintendent, to keep
10 your different certifications by a principal at
11 your current position, you have to do
12 periodically ---

13 A: Yeah, like Erin's Law, that kind of stuff?

14 Q: Right.

15 A: If she had to do it, I guess she did. I don't
16 recall.

17 Q: And she did it for you?

18 A: Did it for me?

19 Q: Yes.

20 A: I don't recall that.

21 Q: Are you saying that didn't occur?

22 A: I'm saying I don't recall.

23 **MR. WINBURN:** I object. Ms. Pike, I don't -- I have
24 no idea what all that has to do with the price
25 of tea in China. If you want to call



1 Ms. Lunsford-Thomas, you can call her. But
2 you've got to list her as a witness.

3 **MS. POLVI:** She's not one of the complainants in
4 this case; he is.

5 **MR. WINBURN:** Neither is 16 of your witness.

6 **Q:** They have direct rebuttal information. And,
7 again, I mean, if we were gonna go on that in
8 terms of the -- none of my ---

9 **HEARING OFFICER:** All right.

10 **MS. POLVI:** --- other witnesses have even been
11 called yet. This is directly related ---

12 **MR. WINBURN:** Exactly.

13 **MS. POLVI:** --- to his credibility.

14 **MR. WINBURN:** And it presupposes facts in -- not in
15 evidence.

16 **HEARING OFFICER:** I'm confused about how this course
17 that Ms. Kelly Lunsford-Thomas took is
18 pertinent to this. I'm not going there with
19 you.

20 **MS. POLVI:** The complaint was that she performed a
21 test for him in his name. But I'm happy to
22 move on to another object.

23 **HEARING OFFICER:** All right. Let's move on.

24 **Q:** Another key aspect with regard to character
25 testimony -- and, again, these are



1 uncomfortable subjects, but it's necessary to
2 determine what personal motives are involved in
3 terms of reporting these complaints and
4 testimony -- is are you aware of Principal Knox
5 reporting to Dr. Slayman that you had an affair
6 with Jeannie Ligon?

7 A: Oh, my gosh. No. That's preposterous. I have
8 no knowledge of that. I don't even know how in
9 the world that could even come up as a subject.

10 Q: Do you deny having an affair with Jeannie
11 Ligon?

12 A: Yeah. I've never had an affair on my wife with
13 anyone. Goodness gracious.

14 Q: Are you aware of Dr. Slayman informing
15 Principal Jim Knox that she needed proof and
16 wouldn't substantiate those allegations against
17 you unless she were to investigate?

18 A: I never knew ---

19 **MR. WINBURN:** Objection.

20 A: --- he made that allegation, so how would I
21 know that. I wish I had. Because like you
22 said, that goes against my reputation.

23 Q: With regard to the hostile work environment
24 complaint that you've lodged, were you aware of
25 Dr. Slayman going to bat for you to the board



1 saying that you were doing a good job in your
2 role?

3 A: Like in -- for a certain -- I know that I got
4 a recognition for leading the district through
5 its first ever accreditation process. I don't
6 know who may have instigated for that to
7 happen. She may have. I don't know.

8 Q: Earlier in your testimony you referred to
9 frustration that Dr. Slayman would take
10 recommendations from individuals described as a
11 breakfast club group. Do you have any reason
12 to believe that she wasn't still listening to
13 the advice that you and other individuals were
14 giving as well?

15 A: I have nothing. No evidence to prove one way
16 or the other of that. I know I would come to
17 her with ideas of initiatives and some things
18 I would hear when I would go to state-level
19 meetings and some others. She was always
20 receptive to that kind of thing to making
21 things, on the instruction side, better.

22 Q: And with regard to your testimony related to
23 the interviewing about some accusations
24 regarding the cheerleading coach, you performed
25 those interviews, right?



1 A: I was a part of the group who did do that; yes.
2 Q: And if there was anything wrong with doing
3 those interviews, you would have had a
4 responsibility to not perform them, right?
5 A: That's a case where you did not say no to
6 Dr. Slayman.
7 Q: And you didn't say no, did you?
8 A: I did not, no.
9 Q: Is that Dr. Slayman wasn't even involved with
10 any questioning, was she?
11 A: She directed us to do the questioning, and she
12 told us what to ask.
13 Q: And you did as requested?
14 A: She's my supervisor.
15 Q: And at no time did you bring prior to this
16 grievance September 8, 2015, bring any concern
17 to the school board for Chester County School
18 District about any of the instructions
19 Dr. Slayman had given you, had you?
20 A: She forbade us to talk to any board members.
21 As a matter of fact, in board meetings, she
22 told us we are not to smile; she told us we
23 were not to whisper to each other; and she told
24 us not to make eye contact with the board
25 members. And I listened. I'm her subordinate.



1 What am I supposed to do?

2 Q: So it's your testimony that during board
3 meeting you would just sit down and look at
4 your lap throughout the whole board meeting?

5 A: Not my lap. We were allowed to have our device
6 in front of us. I mean, we were to pay
7 attention, but we were to be -- basically sit
8 there and not make eye contact with board
9 members -- only certainly, which is protocol,
10 speak unless spoken but not to whisper to each
11 other and definitely not to smile and make any
12 lighthearted humor. I mean, even if something
13 humorous was said by a board member, we were
14 not to smile.

15 Q: So is it your testimony that you didn't
16 actually even talk to school board members
17 ever?

18 A: Not unless they asked me a question directly
19 when I was presenting in school board meetings,
20 which I did quite frequently, or she directed
21 me to. There were times when I recalled
22 Mr. Stroman had a question one time. I don't
23 even remember what it was about. And she had
24 him contact me directly and gave me
25 authorization to talk to him. But it was only



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1 until the grievance was filed that we -- that
2 I had direct dialogue with school board members
3 other than to speak and be courteous.

4 Q: In your testimony you described that you've
5 written up the four-page document and the
6 three-page document both, which you supplied to
7 Betty Bagley, correct? The documents that are
8 before you, Exhibit 13?

9 A: I know I reviewed all of that information with
10 her. I don't recall if I gave her a copy of it
11 or not. I may have.

12 Q: And I believe -- I wrote down at the time --
13 you testified that you have multiple sets of
14 notes archived. How many more multiple sets of
15 notes about Dr. Slayman do you have archived?

16 A: I have my anecdotal notes. I made some at the
17 point of occurrence, some in reflection. I
18 have newspaper articles and other documentation
19 that were subsequent to her resignation from
20 Chester.

21 Q: And as we see from the notes and I believe from
22 your testimony, you didn't sit down on one
23 occasion and write notes; this was a
24 compilation of many days that you wrote things,
25 right?



1 A: Correct.

2 Q: So you were waiting to compile enough
3 information to try to get Dr. Slayman fired,
4 didn't you?

5 A: No. What happened was Ms. Bagley, when she
6 came in to do her inquiry, she asked us to
7 reflect and make notes. And I did. Some of
8 the more egregious things that were of -- had
9 a legal intonation, just like the one with
10 Ms. Ligon being directed to modify the 504
11 document, I did keep a note of that because I
12 didn't want it to come back and haunt me in any
13 way, shape, or form.

14 Q: So let's talk about that 504 document.

15 MS. POLVI: I'm wrapping up soon. Then we can go to
16 lunch.

17 HEARING OFFICER: What exhibit are we on?

18 MS. POLVI: It's 19.

19 (Respondent's Exhibit Number 19 was introduced into
20 the record at this time.)

21 MR. WINBURN: I'm gonna to object to it. I believe
22 it's to Dr. Slayman from Rusty and Jackie
23 P[REDACTED].

24 MS. POLVI: I can bring it in later with Ms. Ligon
25 and Dr. Slayman if necessary, but this document



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1 is referring to what he's testifying about.

2 **MR. WINBURN:** It's hearsay.

3 **HEARING OFFICER:** I don't think that Dr. King can
4 testify to this. He didn't write this
5 document.

6 **MS. POLVI:** Okay. I'll hold off and ask the other
7 individuals.

8 Q: Accurate to say that Dr. Slayman specifically
9 instructed Ms. Ligon to follow the law with
10 regards to it, right?

11 A: To follow the law?

12 Q: Yes.

13 A: Not to my recollection, no, ma'am. She asked
14 Dr. Slayman to modify a document that was, for
15 lack of a better term, already archived. It
16 was an older document. And as I recall, the --
17 what was in question was the student who was
18 the son of that -- the folks you just referred
19 you -- and I've never seen that document,
20 whatever it is you're referring to there. And
21 I've never seen the child's 504 either.

22 I was brought in to have this dialogue with
23 Dr. -- as kind of as a sidebar with Dr. Slayman
24 and Ms. Ligon. What transpired was Dr. Slayman
25 basically tried to push Ms. Ligon to modify the



1 document to show that the child received
2 services so that later in college he would be
3 exempt from foreign language requirements. And
4 Ms. Ligon said no, I'm not gonna change a
5 document that's -- it's already been written.
6 That would be illegal. And Dr. Slayman said,
7 well, you need to do this for him. Otherwise,
8 he's not gonna graduate. And Ms. Ligon
9 obviously felt pressed to the point where she
10 said I'm not gonna change it. Do I need to
11 involve my attorney with this? At which time,
12 Dr. Slayman told her we're done.

13 Q: Didn't Dr. Slayman, prior to that statement
14 that you're testifying to, didn't Dr. Slayman
15 specifically say that everything needed to have
16 I's dotted and Ts crossed to follow the law?

17 A: I don't recall her saying that.

18 Q: I just have a few more questions. You
19 testified to the fact that the board chair,
20 Ms. Lawson, give you the superintendent
21 expectations document. When did Ms. Lawson
22 give you that document?

23 A: I would suspect when or not long after they
24 were written.

25 Q: And you testified that you'd seen the Betty



1 Bagley report before. When did you see it?

2 A: Wow, I don't remember. It would have been
3 after -- obviously after it was written.

4 Q: Before or after the end of Dr. Slayman's
5 employment?

6 A: I would say it would had to been after. I
7 don't even know how I had it, to be honest with
8 you.

9 Q: And you have a copy in your possession?

10 A: I have one right here, yes (indicating).

11 Q: And what other documents did you -- we'll just
12 go kind of in order that you had in terms of --
13 that refreshed your recollection for preparing
14 for today.

15 A: The Bagley report was probably first and
16 foremost. As I said earlier, I was a -- I bore
17 witness to a lot of what was in that, that
18 document -- or what is in document. And what's
19 in it, based on the information I presented to
20 Ms. Bagley, the part I witnessed or was made
21 privy of was from my other notes I had compiled
22 prior to meeting with Ms. Bagley. Because her
23 charge to us, the people she was going to
24 interview was, I need for you to compile some
25 notes, recollections, anything you have in the



1 past that you have to support the investigation
2 one way or the other.

3 Q: And indicative of the information therein, did
4 Ms. Bagley even ever ask you about any positive
5 informing about Dr. Slayman during any time in
6 your interview?

7 A: I don't remember. I don't know. I mean, I
8 have no qualm saying that I've always
9 considered Dr. Slayman to be very bright, very
10 innovative. But somewhere along the way,
11 something changed.

12 Q: When you submitted this grievance, did you
13 intend for it to be given to the Department of
14 Education to have some type of harm given to
15 Dr. Slayman's certificate?

16 A: I actually did not know that was the a part of
17 protocol. I'd never had reason or been in a
18 position to send something to the State
19 department in any role I had had. I never knew
20 that that was something that was going to
21 happen.

22 Q: And do you assert that any harm should be taken
23 towards Dr. Slayman's certificate?

24 A: Meaning, like in my personal opinion do I think
25 there should be some punitive measure?



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1 Q: Yes.

2 A: I do.

3 Q: And what do you believe that to be?

4 A: I guess you'd have to outline what it could be
5 for me to be able to answer that.

6 Q: Well, these are your allegations that the
7 Department of Education is basing their
8 investigation upon.

9 A: Well, I know ---

10 **MR. WINBURN:** I'm objecting. He's ---

11 **THE WITNESS:** I'm sorry.

12 **MR. WINBURN:** My objection is that this is a matter
13 for the hearing officer to decide, and you're
14 asking what the hearing officer should do. I
15 don't know that he's aware of what the options
16 are.

17 **HEARING OFFICER:** I agree. Move on to your next
18 question.

19 **MS. POLVI:** And actually, if we could just take a
20 real quick, brief break ---

21 **HEARING OFFICER:** Sure.

22 **MS. POLVI:** I want to touch base with Dr. Slayman.
23 Then I'll wrap up.

24 **HEARING OFFICER:** Sure. Let's go off the record.

25 (A break was taken.)



1 **HEARING OFFICER:** All right. We're back on.

2 Q: So Dr. King, I have before me the suspension
3 document of Kelly Lunsford-Thomas that's dated
4 June 12th, 2018, signed by Sharon Wall, Ed.D,
5 chair of the South Carolina State Board of
6 Education. Within the document it states --
7 I'm just gonna read the pertinent part, the
8 paragraph I want to ask you about,
9 Lunsford-Thomas holds a valid South Carolina
10 educator certificate and was employed by the
11 district as a data instructional specialist in
12 January of 2013 -- I apologize. I had marbles
13 in my mouth -- in January of 2013.

14 She began a two-year course of study with WGU,
15 which with other requirements, would allow her
16 to qualify to be an assistant principal or a
17 principal. That last part of the program
18 required a practicum. This practicum was to be
19 completed by December 2015. Lunsford-Thomas
20 had only completed approximately 10 percent of
21 that practicum by this date. In order to
22 finish the practicum in a timely manner,
23 Lunsford-Thomas falsified a log of activities,
24 none of which were actually done by
25 Lunsford-Thomas. Her supervisor knowingly



1 signed the false log of activities and
2 forwarded her the links for her to log in under
3 his name and complete the observations and
4 evaluations that were his responsibility to
5 complete.

6 Additionally, Lunsford-Thomas logged in as her
7 supervisor and transmitted the falsified
8 observations and evaluations to WGU with the
9 knowledge and consent of her supervisor.

10 Are you not, indeed, that supervisor?

11 A: I am. But that's based on her testimony, and
12 I was never offered an opportunity to give my
13 perspective in her hearing. So I do refute
14 that I intentionally did any of that to advance
15 her. I did sign off on a log, but she had a
16 voluminous amount of paperwork that validated
17 that. How it did not get entered
18 electronically, I have no knowledge of that.
19 I forwarded her the link solely and expressly
20 for the reason she requested to check her
21 status to see how far along she was and how
22 much more she needed and during that time was
23 the tumultuous debacle that they we were going
24 though. And I honestly didn't give it a second
25 thought. I had way more on my plate trying to



1 keep the district going in between being acting
2 and an interim. And then Dr. Callicutt left,
3 and then there was -- I was acting for a short
4 span again, at which time Dr. Bain was
5 announced as interim. I -- honestly speaking,
6 I did not get that priority. And regarding her
7 case, I was never asked to give my perspective
8 or testimony with that.

9 Q: And the Department of Education's order states
10 in April 2016 a falsified log of events were
11 discovered and Lunsford-Thomas was confronted.
12 She admitted to the falsification and advised
13 the district of the collusion of her supervisor
14 in the falsification of the observations and
15 evaluations. Were you aware of her saying that
16 you colluded with her?

17 MR. WINBURN: I object. This is a trial within
18 trial.

19 MS. POLVI: Again, credibility. This is vital to
20 have on the record.

21 HEARING OFFICER: It does go to credibility. I will
22 agree to that. Go ahead.

23 A: I was never -- I was aware that her accusation
24 was to implicate me. But, again, I was never
25 offered the opportunity to refute that or



1 provide testimony on my own behalf.

2 Q: And the last sentence I'm gonna ask you about
3 says, both Lunsford-Thomas and her supervisor
4 resigned their positions thereafter. Did your
5 resignation have to do with this event?

6 A: The resignation had to do with me getting out
7 of Chester and as a part of that event; yes.
8 It was time for me to go. I already had jobs
9 lined up.

10 MS. POLVI: Those are all my questions.

11 MR. WINBURN: I got a few.

12 **DR. KING - REDIRECT EXAMINATION BY MR. WINBURN:**

13 Q: Okay. The letter of recommendation you wrote
14 in 2011, Exhibit 8, was that before or after
15 you heard Dr. Slayman say, I will rip your
16 throat out?

17 A: Long before.

18 Q: Was it before or after I'll -- that you heard
19 Dr. Slayman say, I'll cut your knees out from
20 under you; that was stupid?

21 A: Years before.

22 Q: Was I before or after you heard her say, and I
23 quote, you screwed up my speech; this could
24 cost you your job?

25 A: Long before.



1 Q: All right. And I believe you were asked
2 whether -- you indicated that you believed
3 Dr. Slayman was holding you back in your
4 career. I believe you answered -- what do you
5 recall your answer to be?

6 A: I felt like there was an impedance.

7 Q: All right. Do you think that Dr. Slayman
8 giving you the instruction to not speak, not
9 smile, not whisper, so on -- and I'm
10 paraphrasing -- with regard to the board, is
11 that an example of how she was holding you
12 back?

13 A: I think it was. It was an example of how
14 controlling she was.

15 Q: All right.

16 A: And oppression.

17 Q: You were asked a couple of questions also.
18 Sorry. Strike that.

19 And I believe your testimony earlier, she
20 instructs you not to communicate with the
21 board. Did she tell you not to communicate
22 with other groups, entities?

23 A: I honestly don't recall. I know we weren't
24 supposed to have any dialogue with the sheriff
25 in, you know, an official capacity. You know,



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1 we had to speak to the man when we would see
2 him out and about, ball games and that kind of
3 stuff to be courteous.

4 **MR. WINBURN:** All right. That's all I have.

5 **DR. KING - EXAMINATION BY THE HEARING OFFICER:**

6 **HEARING OFFICER:** Okay. I have a few questions for
7 you. I want to go back to these superintendent
8 expectations, and I believe you testified that
9 Ms. Lawson give you that document. Can you
10 explain to me why Ms. Lawson would have given
11 you that document with respect to
12 superintendent expectations?

13 A: The only thing I could probably offer to that
14 was that short span of time I was interim
15 and ---

16 **HEARING OFFICER:** Was this ---

17 A: Ma'am?

18 **HEARING OFFICER:** Was this given to you after
19 Dr. Slayman had left?

20 A: Yes.

21 **HEARING OFFICER:** Okay.

22 A: Yes, ma'am.

23 **HEARING OFFICER:** Do you know whose determination it
24 was to employ Betty Bagley to do this
25 investigation?



1 A: I don't know directly. I have my assumption is
2 that it would have to have -- what my
3 understanding was that the board directed the
4 school board attorneys at that time to handle
5 that process.

6 **HEARING OFFICER:** Okay.

7 A: So I don't know how Ms. Bagley was chosen.

8 **HEARING OFFICER:** Was Ms. Bagley an employee of
9 Chester County or Chester School District at
10 that time?

11 A: No, ma'am. And the only interaction I had ever
12 with her, I went to a seminar or a session in
13 Greenville, and she was presenting on
14 transforming schools, school transformation.
15 And I was just in the audience. That's the
16 only time I'd ever even heard of her. But she
17 was not a Chester employee.

18 **HEARING OFFICER:** So she was making a presentation
19 to ---

20 A: A bunch of educators at that conference; yes,
21 ma'am.

22 **HEARING OFFICER:** And ---

23 A: That was probably a year before that.

24 **HEARING OFFICER:** It pertained to -- what was her
25 presentation pertaining to?



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1 A: She does a lot with working with school
2 leaders. I think she did some contract work in
3 the -- with the State department as well. Very
4 well renowned in that arena. But it was part
5 of the support of the profile of South Carolina
6 graduate school transformation. How to better
7 your organization or your schools. Again, it
8 was -- gosh, it was probably a hundred people
9 in the audience easily.

10 **HEARING OFFICER:** Okay.

11 A: And I did not meet her personally that day
12 either.

13 **HEARING OFFICER:** Okay. And you may not have
14 knowledge of this, so please feel free to tell
15 me that you don't have knowledge. Do you have
16 knowledge if she talked to all of these people
17 that signed the Petitioner's Exhibit 8, which
18 was the grievance?

19 A: I believe that she did. But I don't -- I
20 never -- that was kind of kept very private,
21 because it was conducted in the district
22 office. So there was -- as acting
23 superintendent during that time, I know I was
24 dispatched to go to collect at least one or two
25 people, but I can't say that she interviewed



1 everyone. I -- because I did not see them in
2 there.

3 **HEARING OFFICER:** Were those people that you were
4 asked to dispatch, were those people people
5 that were listed on this grievance?

6 A: Yes, ma'am.

7 **HEARING OFFICER:** Okay. Do you know, from your own
8 knowledge, whether or not she spoke to other
9 people other than the people that were on this
10 list, on this document?

11 A: I guess I put a little bit of an addendum. I
12 do -- did know later that all of were folks on
13 the grievance were spoken to by Ms. Bagley
14 because they told me. The only other one I
15 think she talked to are two others. I'm pretty
16 sure she talked with Dr. Slayman herself, as
17 it's indicated in that report, and Jeannie
18 Ligon. I believe she talked with Ms. Ligon as
19 well. But I do not know if there were others.

20 **HEARING OFFICER:** Okay. All right. Do you, from
21 your own knowledge, have any idea how long this
22 investigation took?

23 A: I know she was there at least two days, but I
24 don't recall after that. I don't know if she
25 had followed with the board or the school board



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1 attorneys. I don't know any of that. But the
2 investigation itself was the better part of two
3 days.

4 **HEARING OFFICER:** So that I understand this
5 completely, when you came to work for Chester,
6 that was in 2012?

7 A: Correct.

8 **HEARING OFFICER:** Okay. And Dr. Slayman was already
9 there at that time? As a matter of fact she
10 was recruited you for that position?

11 A: Recruited me to apply. Yes, ma'am.

12 **HEARING OFFICER:** To apply. Okay. All right. So
13 has this contentious relationship existed
14 throughout your tenure at Chester with
15 Dr. Slayman, or was it just the past couple
16 years? What kind of time frame are we talking?

17 A: The first year, as I recounted earlier, I kind
18 of -- everything was in such a state of flux in
19 terms of moving forward and recalibrating the
20 district, so to speak, ramping up for advanced
21 Ed. In my recollection, it really escalated,
22 the behaviors that I've mentioned, from
23 probably 2014 through 2015 'til when
24 Dr. Slayman left. And especially the last year
25 of her tenure there.



1 **HEARING OFFICER:** And that last year would have been
2 2015 ---

3 A: 15.

4 **HEARING OFFICER:** --- right?

5 A: Yes.

6 **HEARING OFFICER:** Okay. And help me in terms of
7 time line. How long had Dr. Slayman been the
8 Chester County superintendent prior to the time
9 you got there?

10 A: She left Kershaw County at the end of 2011 and
11 was hired, as I understand, January of 2012.

12 **HEARING OFFICER:** Okay.

13 A: And I came on board in July 1 of 2012, six
14 months, seven months.

15 **HEARING OFFICER:** Okay. Is there any reason that
16 you could see why these behaviors escalated in
17 2014 and 2015? Were there any specific
18 pressures that you were under during that
19 period of time?

20 A: From me -- you're asking me why I thought maybe
21 why her behavior's escalating?

22 **HEARING OFFICER:** Were there any particular pressures
23 that were on you and her during that period --
24 that specific period of time?

25 A: Again, just from my perspective, you know,



1 Dr. Slayman's always been a high-pressured
2 person. You know, that's not necessarily a
3 negative aspect or trait. I saw things, again
4 in my opinion, get more politicized and more
5 divisive in that arena. We couldn't have any
6 relationship with the county administrator.
7 That was always contentious. The issue with
8 the sheriff got worse and worse over time. And
9 just Mr. Gardner -- and I'm sure he could
10 attest to this as well -- we felt a lot of
11 times that her breakfast group were the ones
12 running the district. It's like they called
13 the shots. Whatever they requested
14 Dr. Slayman, that's where it went. It was the
15 chief of -- fire chief out that way, some
16 others, the county coroner.
17 Again, they -- and I saw one of them one day.
18 I don't mind telling you it was the county
19 coroner. I didn't know him very personally.
20 I knew him as an acquaintance. I said, how are
21 you doing -- gosh -- Tinker -- Mr. Tinker. And
22 he says, I'm doing all right. How are you
23 doing? He said I'm good. He said, man, I tell
24 you, we get a kick out of getting Agnes all
25 riled up. I bet she gives y'all heck when she



1 comes back to the district office. I'm like,
2 yes, sir, she -- actually, she does.
3 And he laughed it off, and we kind of went our
4 separate ways. But I just felt like there were
5 some relationships that probably shouldn't be a
6 part of school district operations that were
7 impeding our momentum.

8 **HEARING OFFICER:** When you worked for Dr. Slayman in
9 Kershaw, did you have any evidence of this?

10 A: That's very interesting. I worked for
11 Dr. Slayman for one year as her assistant
12 principal at a high school.

13 **HEARING OFFICER:** She was principal?

14 A: She was principal. I was her single assistant
15 principal. And when I pursued an open
16 principalship at the elementary level and I had
17 apprized her of that, her words to me was, no,
18 no, no. I'm gon' call Dr. Cain, no, no. And
19 I said, well, I'm gonna talk to him anyway.
20 I've got an appointment with him. And I don't
21 know if it was that day or a day or two after.
22 I went and met with the superintendent, and he
23 interviewed me.

24 And I'll never forget. I got up. I said.
25 Well, you know, I certainly appreciate your



1 time, Dr. Cain. Please -- you know, when do
2 you think you'll make a decision? He said,
3 what do you mean? And I said, well, you know,
4 I'd like to know when you might decide. And he
5 said, no, no. You have the job.
6 Okay. So I went back to school and told
7 Dr. Slayman, and she got angry. She put her
8 hands down. He did what? And I said, well,
9 I -- you know, I hope you'd be happy for me.
10 I said, you know, I'd love to be able to call
11 on you and seek your advice from time to time.
12 She said, no, when you walk out of here, it's
13 over.
14 And I'd had -- I'd even had a desk that I
15 acquired for free from Fort Jackson surplus and
16 had the kids refinish it. She wouldn't even
17 let me take my desk.
18 And after that, she wouldn't speak to me for a
19 couple or three years when we would see each
20 other in meetings. And I have to tell you, the
21 year we worked together, one of the best
22 professional years I've ever had. I got
23 remarried during that time, and my wife was
24 actually kind of the ice breaker ultimately.
25 And the relationship evolved back. We became



1 good friends and professional colleagues again.
2 Had to work more together when I was a middle
3 school assistant principal because my school
4 fed into her school. You know, just by virtue
5 of the job, we had to have dialogue.
6 And then when I left and became a school board
7 member, she would come by and frequently visit
8 me at my gym and was a member of my gym. And
9 we became closer friends at that point, and I
10 felt like we were like we were that year. So
11 certainly when the Chester job became available
12 and she called me about it, I said certainly
13 I'm interested in interviewing. 'Cause we
14 were -- I mean, colleguely and personally we
15 were just fine at that point.

16 **HEARING OFFICER:** All right. I'm confused about
17 something. All right. You were her assistant
18 principal at Kershaw, right?

19 A: Yeah. I guess it might be easier if I just
20 kind of -- if you don't mind?

21 **HEARING OFFICER:** Sure.

22 A: It was kind of an unusual ---

23 **HEARING OFFICER:** Give me the chronology.

24 A: Okay. The chronology, I was her assistant
25 principal.



1 **HEARING OFFICER:** Uh-huh.

2 A: Then I became ---

3 **HEARING OFFICER:** Principal.

4 A: --- a lateral colleague as a principal.

5 **HEARING OFFICER:** Uh-huh.

6 A: A lateral colleague again for one year as a
7 principal. Then she got promoted to assistant
8 superintendent of Kershaw, at which time she,
9 I guess, was kind of oversight. I don't know
10 if she was -- if I would say she was my direct
11 supervisor.

12 Then when I left Kershaw to open my gym, I got
13 elected to the school board. And so I guess
14 kind of then elevated in the capacity to
15 oversight the district, which is what a school
16 board does. And then obviously when I came
17 back into education, she was again my
18 supervisor and my role as her assistant or
19 associate superintendent. So it's kind of been
20 a weird who's-the-boss kind of relationship,
21 who's the colleague.

22 **HEARING OFFICER:** So you were -- let me make sure I
23 have this correct. You were her assistant
24 principal in Kershaw. Then you applied for the
25 principal position, which you got. Then you



1 applied for another principal position
2 someplace else.

3 A: The school that fed into hers, North Central
4 Middle. That's -- I opened that school. It
5 was a new school.

6 **HEARING OFFICER:** And at that time, she was still a
7 principal?

8 A: She might have to -- one year I think.

9 **HEARING OFFICER:** Okay.

10 A: And then the next year was assistant
11 superintendent ---

12 **HEARING OFFICER:** Okay. So then ---

13 A: If my mind serves -- memory serves.

14 **HEARING OFFICER:** So then she became assistant
15 superintendent in Kershaw?

16 A: Correct.

17 **HEARING OFFICER:** And then you went out on your own
18 and you were elected to the school board in
19 Kershaw?

20 A: Correct.

21 **HEARING OFFICER:** And then you relinquished that
22 position to become her associate superintendent
23 in Chester?

24 A: I actually -- at that point, I had served my
25 term. I was off the board at that time.



1 **HEARING OFFICER:** Okay.

2 A: I was just a private business owner.

3 **HEARING OFFICER:** Okay.

4 A: Not just a private business owner but a private
5 business owner. Never easy. And then during
6 my tenure in Chester, I ran for the school
7 board in Kershaw County and got elected again.
8 So I was a serving assistant superintendent and
9 a school board member laterally, and that was
10 with her full knowledge and support.

11 **HEARING OFFICER:** Okay. I get it. So all and all,
12 how many years have you known Dr. Slayman?

13 A: Dr. Slayman was an assistant principal in
14 Kershaw when I was a teacher. And then when I
15 was an assistant principal the year before she
16 became principal, we would see each other, but
17 we had never actually officially met. The day
18 I officially met her was when she came to north
19 central high school after she had been
20 announced as principal. That would have been
21 summer of 1997.

22 **HEARING OFFICER:** Okay. So ---

23 A: 21 years.

24 **HEARING OFFICER:** Okay. Were you ever written up by
25 Slayman for anything?



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1 A: Not to my knowledge; no, ma'am.

2 **HEARING OFFICER:** Okay. Were you ever afraid that
3 you were going to be disciplined by Slayman?

4 A: In a written format, I don't know that gave
5 that much thought. I mean, I'm one of those I
6 take things to heart. Just being berated and
7 threatened was enough for me. I felt like that
8 was discipline.

9 **HEARING OFFICER:** So you were never afraid for your
10 job; is that a fair statement?

11 A: I was afraid for my job on more than one
12 occasion, because she'd tell me, if I go down,
13 you go down. If I misspell a -- something to
14 me as minute as misspelling one word on a
15 document I've prepared. You do this again, you
16 could lose your job. And, of course, the veil
17 of the other people she'd threaten with their
18 jobs always let everybody believe that we were
19 on -- walking a razor's edge.

20 **HEARING OFFICER:** Okay. I may have additional
21 questions later, but I don't want to hold you
22 here unless there's some reason that either of
23 you would need ---

24 **MS. POLVI:** No.

25 **HEARING OFFICER:** As long as we can call you.



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1 THE WITNESS: Okay.

2 (Witness excused.)

3 (Off the record.)

4 HEARING OFFICER: All right. Mr. Winburn, would you
5 like to call your next witness?

6 MR. WINBURN: Thank you, Ms. Pike. The Department
7 calls Jeff Gardner.

8 HEARING OFFICER: Okay. Mr. Gardner, will you
9 please let the court reporter swear you in.

10 LEONARD JEFFERS GARDNER, having been duly sworn,
11 testifies as follows:

12 MR. GARDNER - DIRECT EXAMINATION BY MR. WINBURN:

13 Q: Mr. Gardner, will you please state your full
14 name for the record?

15 A: Leonard Jeffers, J-E-F-F-E-R-S, Gardner.

16 Q: And briefly, can you tell me -- give me a brief
17 recitation of your professional credentials,
18 what you're doing now, and what you've been --
19 what you have done in the education world?

20 A: I started out as a contractor for ten years.
21 And then I became a building construction
22 instructor. Meantime, got my administrative
23 degree, masters degree, became a assistant
24 principal, a principal, and then associate
25 superintendent for operations.



1 Q: And when were you associate -- in general,
2 associate superintendent of operations?

3 A: I think it was August of '12 that I came in up
4 to this year. But the title changed from
5 Associate Superintendent to Chief Operations
6 Officer.

7 Q: Okay. And where are you currently?

8 A: I'm currently at Chester County Career Center,
9 and I am a carpenter instructor.

10 Q: All right. And we are here today in connection
11 with a grievance that was filed in September of
12 2015. And you should have a copy of ---

13 A: This?

14 Q: No. It's a different one. But I'll just
15 submit to you it's Exhibit Number 8.

16 (Off the record.)

17 Q: Let me ask you just ask you while we're ---

18 A: Uh-huh.

19 Q: --- fumbling around. Do you remember filing or
20 signing a grievance document in September of
21 2015?

22 A: I do.

23 Q: And in that, you guys were alleging -- or the
24 signatories we're alleging a hostile work
25 environment?



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1 A: Yes, sir.

2 Q: And that was in Chester where you were working
3 under Dr. Agnes Slayman.

4 A: That's correct.

5 Q: Okay. I have handed you what's been marked as
6 Petitioner's, Department's Exhibit 12.

7 **(Petitioner's Exhibit Number 12 was introduced into**
8 **the record at this time.)**

9 A: Yeah.

10 Q: It's been already -- it's been premarked for
11 identification. Can you identify what I've
12 handed you?

13 A: I can.

14 Q: And what have you got?

15 A: These are grievances and evidence of things
16 that were going on with particular -- the
17 security of Chester County School District.

18 Q: Are these your notes?

19 A: Yes.

20 Q: Okay. What prompted you to create these notes?

21 A: Well, as I saw things kind of going south at
22 the district, I started keeping very detailed
23 notes. Times, dates, that kind of thing
24 because I didn't know what was going to happen.
25 I was not being informed about things that I



1 was gonna be responsible for, such as security
2 and other things. I was left out of meetings.
3 And I knew that it was not gonna end up well.

4 Q: Okay. Now, I'll just submit to you I had one
5 other witness so far today and that was
6 Dr. Charles King. I had him create -- I need
7 to put it into evidence -- create a diagram of
8 the office suite. But is it fair to say that
9 you had an office in close proximity to
10 Dr. Slayman and to Charles King?

11 A: Yes. Right beside Dr. King.

12 Q: All right. So you worked with Dr. Slayman on
13 a day-to-day basis?

14 A: Yes.

15 Q: Met with her regularly?

16 A: Yes.

17 Q: Can you just describe -- you know, and I'll get
18 more specific later, but if you can just tell
19 the hearing officer in general why you believed
20 that you were working in a hostile environment?

21 A: Well, we never knew -- I never knew what was
22 gonna come at me next. I never knew -- I was
23 over food service, attendance, transportation,
24 maintenance, athletics, IT, security, and
25 building and construction projects. A lot of



1 stuff.

2 Q: Right.

3 A: And that demanded that I be informed of what
4 was going on. In all that, there was a great
5 deal of politics of which I tried to keep
6 myself out of. The politics got to the point
7 where there was -- I felt like there was a
8 paranoia on Dr. Slayman's part about making
9 decisions. And decisions would be made,
10 changed, made, changed, made, changed. But I
11 was responsible at any one time for whatever
12 position we were in. So if I didn't know
13 exactly what was going on, then I may be
14 berated for that. I may be told that -- you
15 know, if something happens, you're going down
16 with me and Dr. King and that kind of thing,
17 when a lot of times I was left out of those
18 discussions.

19 Q: Okay. Would you describe it as a stressful
20 environment?

21 A: Yes.

22 Q: All right. Can you think of a specific -- you
23 already provided the if you're going down --
24 you're going down with me, I believe you
25 testified. Is there another phrase that comes



1 to mind that Dr. Slayman would -- a statement
2 she would have made toward you or toward
3 others?

4 A: Cut your throat out, kill you. She more than
5 once referred to the fact that she had a CWP
6 permit.

7 Q: Do you remember in connection -- in what
8 connection did she make the statement about the
9 CWP? And I'm assuming that's concealed weapons
10 permit?

11 A: Yes.

12 Q: Okay.

13 A: I made a little note of that before I came in.
14 I was trying to -- give me just a second.
15 She referred to driving at night and not
16 knowing whether she would be stopped by an
17 officer that the sheriff may have put out. She
18 said, I carry a CWP because I'm worried about
19 the politics around here.

20 Q: And by that, did you understand -- what did you
21 understand that to mean by the politics around
22 here?

23 A: Well, we weren't allowed to -- the politics had
24 gotten to the point where we didn't really know
25 what was going on, because there was a group



1 that she was meeting with that was against
2 certain people in the county, sheriff's
3 department, EMS, just kind of almost like a
4 silly club that was going on.

5 And they were making a lot of the decisions,
6 and there were rumors going around about
7 somebody getting somebody and all this kind of
8 stuff, which was just -- had totally nothing to
9 do with what we needed to do in the district.

10 Q: Okay. Let me ask you a couple of questions
11 about security. And I'm looking at -- I pose
12 Exhibit 12 and the heading is Security. I'll
13 try to hit some hot spots on that. What was
14 your involvement or if you can kind of
15 describe, the issue in the SROs versus
16 Defender -- just in general, what was going on
17 at the time, that time during the district
18 related to security?

19 A: What had happened was that the sheriff had put
20 an article in the paper about one of the
21 deputies being able to get into one of our
22 buildings, coming through a window. And it --
23 Dr. Slayman felt like it had made us look bad.
24 After that point, she had -- she wanted nothing
25 else to do with him, so we couldn't speak to



1 him. She decided that she wanted to get them
2 out all, and she wanted to get SSOs in,
3 Defender in.

4 So we talked to American Securities first.
5 They found out that we were not talking to the
6 sheriff, and they completely had nothing to do
7 with us. Then we talked to Defender. They
8 recommended a blended model. There was a lot
9 of stuff going on behind the scenes with
10 whether they could arrest, whether they could
11 carry a gun, how much people were gonna get
12 paid, that kind of thing. Some of which I was
13 privy to, and some of which I was not privy to.
14 But what was worrying me the most was that in
15 the meantime, the kids' safety was in jeopardy,
16 and that was what was affecting me the most.

17 Q: Why in your view were -- was safety an issue?
18 Why were the kids in jeopardy in your ---

19 A: Well, if I can't talk -- I can't talk to the
20 sheriff. Okay. I can't talk to the County
21 supervisor. Can't talk to -- it goes on and on
22 and on. The officers could not access the
23 school cameras. We couldn't give them keys.
24 Keys to the building, could not got give them
25 to them. Laptops so they could view what was



1 going on with our security stuff.

2 Q: And when you say access to the cameras, what do
3 you mean by that?

4 A: We put in 600 cameras in buildings to monitor
5 what was going on.

6 Q: Are you talking about remote access to those
7 cameras?

8 A: Uh-huh.

9 Q: Are you talking about ---

10 A: At ---

11 Q: Come in ---

12 A: At the job, on the job; yes.

13 Q: So -- but I mean with the officers being --
14 which officers would not be ---

15 A: SROs.

16 Q: --- wouldn't have access?

17 A: SROs.

18 Q: Okay.

19 A: In the building.

20 Q: The serving SROs did not have access to
21 cameras?

22 A: Right. In the building.

23 Q: And does that mean that they did not -- they
24 were not looking at the monitors, or they
25 weren't allowed to access the footage to rewind



1 something?

2 A: Either, either.

3 Q: Who was preventing them from having access?

4 A: I'd been told to not to let them have access by
5 Dr. Slayman.

6 Q: Okay. And then you mentioned earlier you were
7 not supposed to talk to the sheriff or the
8 County administrator. Was that an explicit
9 directive, or was that something more along the
10 lines of, well, I really don't want you to
11 without me ---

12 A: That was explicit. And I have -- I can
13 probably provide even, but not at this time,
14 specific situations where I was told that date
15 and time.

16 Q: Okay. On the issue of access -- I'm sorry.
17 What was the involvement of the sheriff's
18 office in your -- based on your understanding
19 and your involvement as head of security,
20 overseeing security, what was the sheriff's
21 involvement in securing of school?

22 A: They wanted to train with us. They wanted to
23 have blueprints of our buildings. They wanted
24 to ---

25 MS. POLVI: And I have to interject an objection



1 here. And I've let this thread go for a while
2 but, again, this is what the sheriff's office
3 wanted to have and didn't want to have is
4 absolutely not relevant to this -- whether or
5 not there's a hostile work environment.

6 **MR. WINBURN:** Well, if I may, I think he's certainly
7 capable of testifying. I didn't ask this line
8 of questioning to Dr. King. He's head of
9 security. If he's given a directive not to
10 talk to the sheriff and he feels the need to
11 protect kids that these interactions that did
12 not take place ought to have taken place, he
13 felt hamstrung by the directive of Dr. Slayman
14 is absolutely relevant. It's absolutely ---

15 **MS. POLVI:** That's not what you're asking him about
16 though. You're asking him about ---

17 **MR. WINBURN:** It's absolutely relevant to the
18 hostile work environment.

19 **MS. POLVI:** --- what the sheriff's office was
20 thinking.

21 **MR. WINBURN:** It's absolutely relevant to hostile
22 work environment. It's absolutely relevant to
23 whether those type of directives coming from
24 the superintendent are reasonable under the
25 circumstances. It goes to all of them.



1 **MS. POLVI:** But, again, I think it ties into the
2 exact things that I referenced in my opening
3 statements about that this is largely a
4 personal vendetta about individuals who are
5 afraid for their job and felt that they were --
6 they had political types of concerns.

7 **HEARING OFFICER:** I think Mr. Winburn is entitled to
8 ask him about this because I think this sets up
9 the scenario that Mr. Winburn was trying to
10 establish here. And I think he has the right
11 to do that.

12 **Q:** So was there training between, that you're
13 aware of, the sheriff's office in an
14 active-shooter scenario, for example? While
15 you were there, was there ever any training
16 with the sheriff's office?

17 **A:** There could have been, at some point, a partial
18 training that did not have the people we needed
19 in there. There was once that -- Wayne
20 Freeman, who was the SLED agent for the state
21 who did the training, came and brought Officer
22 Poole and Officer Sprouse. After that was
23 found out that he had brought them, then we
24 could no longer use Wayne Freeman because
25 Dr. Slayman did not want Wayne Freeman to have



1 the sheriff have anything to do with the
2 schools because she said if someone came -- if
3 he wanted to to make us look bad, her quote
4 was, he could send somebody in that looked like
5 a student with a gun. And he would make us
6 look bad. So we were told not to have the
7 sheriff, Wayne Freeman and to get an
8 independent group to come in and do our
9 training. I had to hire an independent group
10 called Threat Suppression that was between a
11 thousand and \$1400 when I could have gotten
12 that for free. And his recommendation to me
13 was: Get everybody together. He came, and we
14 invited everybody to come. And people that
15 came were primarily fire and maybe -- and EMS
16 people.

17 Q: Okay. So who was ultimately hired, and were
18 you involved in the hiring of Defender?

19 A: I was in on some of that; yeah.

20 Q: So what ultimately happened with regard to
21 SROs? Who was -- who ended up serving as SROs?

22 A: Well, we started out -- we made an introduction
23 at a meet and greet in Louisville where we were
24 to introduce all of the new SSO officers.
25 It -- those were not the actual officers. I



1 was told to tell the board that that was the
2 actual permanent officers. I was directed that
3 by Dr. Slayman. That was not the officers
4 there. That was -- to me, that was creating a
5 very hostile environment. So ---

6 Q: It's your testimony that she told you to lie?

7 A: Yes.

8 Q: And you did?

9 A: I did.

10 Q: Can you describe the scene of those SRO --
11 SSO -- I'm not sure what you were calling them.

12 A: They were SSOs. We were all sitting around.
13 They sat at different tables for different
14 schools. They were supposed to be the
15 permanent officer for that school, most of
16 which I think was 9 I had never seen before.
17 And they had brought them in as quick
18 replacements because there were not enough
19 people to hire in Chester, Rock Hill, or
20 anywhere else. And so that was what we did
21 instead of saying we don't have everybody now.

22 Q: Is it fair to say they were stand-ins?

23 A: Yes.

24 Q: Now, in terms of the actual introduction or the
25 conveying of this information to board members,



1 how did that occur? Was that part of the --
2 was it part of the meeting? Was it part of the
3 introduction around the room, or do you
4 remember?

5 A: It seemed like Dr. Slayman and I both had
6 something to do with -- I know we all spoke.
7 I can't remember exactly how it all went.

8 Q: All right. Is there any other information
9 related to the SSOs?

10 A: SSOs. Well, the information about -- that we
11 didn't talk about, which is the chief, which
12 Charles and I -- Charles King and I were put in
13 charge of interviewing for the chief of
14 security, and it was not implicit, but it was
15 implied that Andre Williams would be the chief
16 of security, and he was told so before he
17 interviewed for the job. Charles and I were in
18 there. And we told every other applicant that
19 they would make -- it was either 38- or \$39,000
20 a year. When he got the job, she roasted up to
21 61-, \$62,000 a year under the auspices of he's
22 going to net \$39,000 a year. Well, we lied
23 to -- we lied to every one of those applicants
24 because the salary was not \$39,000. It was
25 going to be \$62,000 a year.



1 Q: At the time you were interviewing, did you know
2 that that was the plan?

3 A: No, we did not know that was the plan.

4 Q: Was Mr. Williams the best candidate? Was he
5 the best candidate?

6 A: We had our doubts about him, but we felt like,
7 you know, he could do the job. But there was
8 another candidate also that was -- that we were
9 recommended by Defender, highly by Defender,
10 that we would have considered more heavily if
11 we hadn't known what we were sent there to do,
12 more or less.

13 Q: All right. And looking at your notes on the
14 first page of Plaintiff's Exhibit 12, the
15 last -- second to last bullet, and I'm quoting,
16 lied to the board and told them each Defender
17 officer was permanent. Are you referring to
18 the assembly, the meeting ---

19 A: Yes.

20 Q: --- that we just spoke about? Okay. This also
21 indicates evidenced by myself in conversations
22 witnessed by Brooke Clinton. Did she attend
23 that meeting?

24 A: Uh-huh.

25 Q: Sorry. Was that a "yes"?



1 A: Yes, sir. I'm sorry. Uh-huh.

2 Q: All right. In the middle of the page, there's
3 also a note asking me to withhold from the
4 board that Defender did not administer first
5 aid or CPR?

6 A: Yes.

7 Q: What is that about?

8 A: Well, it was asked by one of the board
9 members -- as I recall, which I have notes on
10 that too -- date and time. It was asked
11 whether we were in one of the -- I think one of
12 the board members had asked whether they could
13 do that. And so I talked to, I believe it was
14 Vernon. And he said, no, they would not
15 administer CPR or first aid. And Dr. Slayman
16 turned to me and said, the board does not need
17 to know that.

18 Q: Okay. The next page at the top bullet quoting
19 in your notes, instructed me to hire a white
20 officer after a black officer was in place
21 because the administration team was black and
22 the population was white.

23 A: Yes, sir.

24 Q: What's that all about?

25 A: On 8/17/15 at 9:12, I called while I was --



1 hang on one second. Let me make sure. I
2 called Dr. Slayman about being sent -- she
3 wanted to know if the person who was the SSO
4 being sent to LES met the quote/unquote
5 criteria. She said Pat Hensley and Denise will
6 be all over this. Pat is already calling
7 wanting to know if this was the right thing to
8 do to put Defender in. We could get sued. And
9 that was over the, I suppose, the American
10 Security thing that we had been going --
11 talking about.

12 I called Andre asking him if he had someone to
13 send to LES that met the criteria. And that

14 was all I said because I thought he knew what
15 criteria was. He said he had talked to Agnes
16 Slayman. She was okay with the officer he was
17 sending over to LES. At 10:15, I went to LES.
18 I met Dr. Slayman coming up the road almost in
19 front of Louisville High School. I flashed my
20 lights to get her to stop. She said, have you
21 seen the permanent security guard he brought to
22 LSS [sic]. I said no. She said, he's black.
23 Fix it.

24 I called Vernon Siebert at Defender, asked him
25 if he had hired a permanent officer for the



1 Louisville Elementary School. He said no. I
2 told him that Dr. Slayman said the criteria was
3 they had to be white. I could tell she was
4 stunned. I went ---

5 **MS. POLVI:** Quick objection here. That document
6 that you're reading from is not part of this
7 exhibit, and I would strike it as not being --
8 I mean, this testimony ---

9 **MR. WINBURN:** Would you like it ---

10 **MS. POLVI:** But it's not been proffered as an
11 exhibit before, and he's reading it in as it's
12 the truth of the matter asserted. Again,
13 that's not been a proffered exhibit.

14 **MR. WINBURN:** No. Well, that's right. He's reading
15 from his own notes, apparently so ...

16 **THE WITNESS:** Yeah.

17 **MS. POLVI:** I mean, again, I would have it being
18 stricken as not allowable to be testified. I
19 mean, he's reading from a document.

20 **MR. WINBURN:** Well, he's reading of his own notes.
21 But ---

22 **THE WITNESS:** It's my notes in my handwriting.

23 **Q:** And you can testify. You can look at your
24 notes to refresh your recollection.

25 **HEARING OFFICER:** Refresh your recollection in the



1 future.

2 **THE WITNESS:** Okay.

3 **HEARING OFFICER:** Those are his notes. He's
4 testified that those are his notes. And he's
5 refreshing his recollection with those notes.

6 **MR. WINBURN:** Sorry. I wasn't clear about that.

7 **THE WITNESS:** So I -- yeah, you know ---

8 Q: You can speak. That's okay.

9 A: It -- well, the reason I have these notes is
10 because we're in a predominantly black district
11 and I was shocked. And I wrote this down.

12 Q: Is Louisville predominantly white or black?

13 A: It's predominantly white.

14 Q: Okay. So I suppose -- well, I don't want to
15 speculate with a question but -- and is your
16 testimony that Dr. Slayman, after learning that
17 the new SRO was black, she told you to, quote,
18 fix it?

19 A: Uh-huh.

20 Q: I'm sorry. Is that a "yes"?

21 A: Yes, sir. I'm sorry.

22 Q: That's all right.

23 A: Yes, sir.

24 Q: So on this same subject, do you recall any
25 other occasion where Dr. Slayman made any



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1 comments that related to race?

2 A: Yes. When she got back from Idaho, we were in
3 her office. She was turned facing me looking
4 at me and leaned back, and she was talking.
5 And she was talking about how when she got off
6 the plane that she either said to Denise Lawson
7 or said to herself -- I cannot remember which
8 one it was -- where are all the black people?
9 And she found out or Denise said it was
10 95 percent white or something, and she said,
11 heaven, man, heaven.

12 Q: Who said, heaven, man, heaven?

13 A: She did, Dr. Slayman.

14 Q: All right. Was anyone else in the room when
15 she said that to you?

16 A: I don't think so; no.

17 Q: Is your testimony that you believe that
18 conversation took place in her office?

19 A: In her office. I can remember vividly. I
20 remember how she was sitting. I remember how
21 she was -- her legs were going like this
22 (indicating). And she was looking down and
23 talking to me. I remember it like yesterday.

24 Q: Are there any other occasions where Dr. Slayman
25 made comments that related to race that



1 concerned you?

2 A: Nothing that shocked me to that point that I
3 recall. I don't recall ---

4 Q: Okay.

5 A: --- any others.

6 Q: Just going down your notes that have been
7 submitted and, again, in fairness to Ms. Polvi
8 and Dr. Slayman, let's try to keep it ---

9 A: Sure.

10 Q: --- your recollection but ---

11 A: Yes, sir.

12 Q: --- in the notes submitted, in the middle of
13 the page the date at the heading is 11/13/2014?

14 A: Yeah.

15 Q: This -- sorry. I'm going backwards a little
16 bit.

17 A: Uh-huh.

18 Q: There's a quote in the middle that you --
19 indicates we need to mend fences over there.
20 Who was saying that, and what did it relate to?

21 A: That was the sheriff. I -- Dr. Slayman and I
22 had talked about going to this workplace
23 violence training that was being held at the
24 County office. And the sheriff was there and
25 Officer Sprouse, they were both putting on the



1 training. And so, of course, I stopped and
2 talked to the sheriff, and he said we need to
3 mend fences over there. And he said he had
4 called her and that she had not called him
5 back.

6 Q: What do you recall your conversations were with
7 Dr. Slayman subsequent to your discussion with
8 the sheriff?

9 A: Well, she said we were gonna go, that the board
10 was worried that our security training, that we
11 were not -- the board and everybody else was
12 worried that the school district, the emergency
13 management services, fire department, the
14 sheriff, the police, none of those people were
15 communicating together with the districts.
16 Different groups were, but it had gotten to the
17 point where the school district was definitely
18 not talking to the sheriff's department. And
19 there were -- they were -- we were having a
20 problem with, I believe it was EMS. And it was
21 all of this politics that was going on.
22 Well, the school board wanted us to, of course,
23 have a training where everybody was together.
24 Everybody was training together. So when she
25 found out -- I'm assuming this -- when she



1 found that they were gonna do this workplace
2 training -- violence training, she sent me
3 there. When I came back, she said, do they
4 kind of do the same thing that we do? Were
5 they teaching the same thing we -- I said,
6 well, yeah. She said, well, good. Now we can
7 tell the board that we trained together, that
8 our trainings mesh.

9 Of course, they didn't. Were was -- I mean,
10 they were just doing workplace violence
11 training. We weren't doing anything as far as
12 specifically training the schools and the
13 district together.

14 Q: Okay. Other occasions, statements that you
15 heard, not that someone told you about, are
16 there other occasions that you heard
17 Dr. Slayman disparage others or threaten others
18 or threaten you that you can think of?

19 A: She picked a very inopportune time after, I
20 believe it was either a principals meeting or
21 principals or administrator's retreat, to
22 berate Dr. King in front of everyone, getting
23 in his face and shaking her finger in his face.
24 And there was a number of principals and other
25 administrators who thought it was just out of



1 place ---

2 **MS. POLVI:** Object. He's about to hearsay about
3 what other people are thinking and saying ---

4 Q: Yeah. Just about what you observed.

5 A: Okay. That's what they said.

6 Q: But what you observed.

7 A: Yeah. What they told me.

8 Q: Had you ever seen any other superintendent
9 berate a subordinate like that?

10 A: Never.

11 Q: You seen any subordinate be berated the way
12 that you saw Dr. Slayman berate Dr. King since
13 that time?

14 A: No. No, sir.

15 Q: Tell me what you remember about the incident
16 regarding the cheerleading coach.

17 A: Kim Sanders was the cheerleading coach at
18 Chester High School. She was reputed to be the
19 girlfriend of the sheriff.

20 Q: Was the sheriff married?

21 A: Yes, he was.

22 Q: Okay.

23 A: Yeah.

24 Q: Implication is he's having an affair?

25 A: He's having an affair.



1 Q: All right. So what did you do?

2 A: So Charles and I were instructed to go over
3 and, more or less, get rid of her. And we felt
4 very uncomfortable with what we were doing
5 because we were bringing students in and asking
6 them questions. They were getting very upset
7 about it. Kim finally said that she felt like
8 she could no longer be efficient at the job and
9 that she was going to resign.

10 Q: Do you remember what time of year that was, by
11 chance? I mean, was it in the middle of
12 football season, after football season? Do you
13 remember anything like that?

14 A: I really don't. I may have written it down on
15 my calender. I've got calenders at home that
16 I kept the dates of when I did that kind of
17 thing and I possibly ---

18 Q: Do you happen to know how long Ms. Sanders been
19 the cheerleading coach? Was that her first
20 year?

21 A: No. I think she had been a couple, three
22 years, something like that.

23 Q: Okay. And will you just describe briefly what
24 the interviews were -- where they were, how
25 many cheerleaders interviewed?



1 A: We interviewed them in the Chester High media
2 center, as I recall. And we interviewed them
3 in the little separate rooms that we used for
4 storing different media equipment. Probably
5 five or six girls. And it got back around to
6 where it could have been rumors because of one
7 cheerleader that was not satisfied with how her
8 placement was on the squad and that kind of
9 thing.

10 Q: Okay. Did you agree with the directive -- I'm
11 sorry. Let me strike that.

12 Did you express any hesitation to Dr. Slayman
13 about going and doing this job that she's asked
14 you to do?

15 A: Yeah. We felt -- both Charles and I both felt
16 uncomfortable about it.

17 Q: But did you tell Dr. Slayman, we can't do this?
18 I don't feel good about it.

19 A: I never said that. I don't think so.

20 Q: Did you, in general -- nah, strike that.
21 Strike that.

22 Can you think of other times where Dr. Slayman
23 directed you to do things that you didn't agree
24 with?

25 A: Well, there were times where -- there were many



1 times where, for instance, dealing with the
2 YW -- YMCA, the Boy Scouts and Girl Scouts.

3 Q: Why would you have to deal with those groups?

4 A: That was mostly for -- they would use the
5 buildings. They would also request that they
6 have access to the buildings for a little
7 recruitment, that kind of thing.

8 Q: Uh-huh.

9 A: And there were times where we would change a
10 procedure as far as what they could do with the
11 building, when they could come in, and that
12 kind of thing. And then we would -- the next
13 day we would change it again, and I would have
14 to call them again. Things like that would go
15 on quite often. So I -- you know, it was --
16 that kind of stuff was tough because many times
17 I could not figure out where these -- where
18 this was coming from, why we would be treating
19 these people that way.

20 Q: I'm sorry? Why you would be treating who that
21 way?

22 A: Boy Scouts, Girl Scouts, YMCA. And then, of
23 course, every -- you know, as far as games went
24 when I was dealing with SROs at games there
25 were times where we needed -- we would possibly



1 need more officers, and I was directed not to
2 bring in more officers or use more SR -- SSOs
3 instead of SROs. That kind of thing is -- it's
4 usually figured out by the sheriff's department
5 because they know how big the games are gonna
6 be; they know what's going on in the
7 communities; they know if there's a problem
8 with a gang going on here and a gang going on
9 there, and have always in the past have tried
10 to go by their recommendations. So they
11 were -- you know, there were times that I would
12 have to go against what was a good common
13 sense, of course. I had to do it. That was my
14 job.

15 Q: So I know we kind of started with a question
16 like this, but can you tell me just in general
17 what -- how often you would speak to
18 Dr. Slayman on a day-to-day basis?

19 A: Some days it could be five to ten times. It
20 depends -- at times, I would be sitting in my
21 office and she would yell out my name, which to
22 everyone around me thought was kind of
23 humorous. I didn't find any humor in it. I
24 thought it was disrespectful.

25 Q: When you say, "yell out," what do you mean by



1 that.

2 A: I mean it was like, Jeff. It was just from her
3 office sitting down in her chair.

4 Q: You were expected to ---

5 A: To jump up, go in there. And then we may spend
6 two hours going through scenarios of different
7 who said what; who's doing what; who's plotting
8 this; who's plotting that, that kind of thing.

9 Q: Do you think -- Did you share your concerns --
10 or if you had them -- did you have concerns at
11 that time about Dr. Slayman's things that she
12 would tell you to do, the way she's treated
13 you? Did you share those with anybody?

14 A: I did.

15 Q: Who did you share those with?

16 A: I took advantage of the employment assistant
17 program.

18 Q: Uh-huh.

19 A: And got counseling. I also went to my family
20 doctor and was written out several times just
21 because I was at a point in the stress that I
22 felt like I had to take mental health days. Of
23 course, I expressed it to my wife. And I also
24 have some relatives that are in school
25 administration that I talked to about it to try



1 to find out if this was a nothing thing.

2 Q: So backing up a little bit, this happened when
3 you first -- from the outset of working with
4 Dr. Slayman? Or how would you describe?

5 A: At the outset, things were, I thought, were
6 okay. And then things started -- things just
7 got weird. I don't know any other word to use.
8 Things just really got strange.

9 Q: Do you remember a time frame there in mind?

10 A: Well, I know that the first thing that -- two
11 weeks after we -- I was at CHS as a principal,
12 and this was one of the times that she said
13 something that was very -- that put my antennas
14 up was -- that was when she said she would cut
15 my legs out from under me if I ever did it
16 again. And that -- what I had done was stupid.
17 I don't exactly remember what that -- at that
18 particular time ---

19 Q: What you had done?

20 A: What I had done. But to me, that was to
21 unprofessional and so -- I had gotten -- not
22 all exemplary evaluations but very close to
23 exemplary evaluations since I've been a
24 teacher. I've never been spoken to like that.
25 Never.



1 Q: How did it make you feel to be spoken to like
2 that?

3 A: It was shocking. It really was. I was
4 expecting anything but that. I'm good at being
5 corrected. If I make a problem, I make an
6 effort to correct what I've done.

7 Q: So tell me how -- as time went on, how would
8 you describe your relationship to Dr. Slayman
9 and -- or your interactions with here? How
10 would you describe those?

11 A: Well, it -- things became obsessive. She
12 became to obsess over very small issues that
13 grew into very large issues. We were going to
14 sell a very small easement to Grazier Rhea, I
15 believe it was. And it was just so that this
16 group could come in and clean out a ditch on
17 one of our properties.

18 Well, I researched that back to the original
19 land grant. I spent 19 hours on all on --
20 because she thought that -- or she told me
21 this -- not thought. She told me, I've heard
22 they're gonna put some apartments in there, and
23 they could build something over this easement.
24 I tried to tell her it was six feet on each
25 side of a ditch in an area where there was --



1 the houses -- most of the houses are \$10,000 or
2 less. This was an area -- I had -- it really
3 had no value. I had to keep going back and
4 researching and talking to people and
5 researching. I'd bring it.

6 It got to the point where, I mean, people would
7 come by and they were literally laughing at me
8 sitting in this office with all these maps out
9 over here. I just did not know what else to
10 do. And it -- that was just one thing. I had
11 food service, attendance, transportation,
12 maintenance, athletics. You know, I mean, it
13 was day after day, that kind of thing. And if
14 it wasn't the answer she wanted to hear, then
15 you're right back at it. It was an almost
16 impossible situation.

17 Q: Do you remember her saying things that you
18 deemed hurtful or unprofessional like the ones
19 you just described about I'll cut your legs off
20 or whatever it was? Do you remember other
21 specific instances where she berated you?

22 A: Yes. About Rick Hughes.

23 Q: Okay.

24 A: She -- one time on the phone she told -- I was
25 in there and she said, we've got a board member



1 that's gone rogue. He's -- we're gonna fix
2 him. She said, I've got one of the board
3 members talking to him now. We're going to fix
4 him. I'll -- that was when she said, I'll cut
5 his throat out. That was one of the times she
6 said that. Then there was another time we were
7 coming out of the boardroom. And I was -- she
8 was opening the door -- there was a back door
9 from the board room. And I was standing there
10 and -- oh, gosh. I can't exactly remember what
11 the whole thing was. And there was another
12 time that she said -- it was something along
13 the times of I'll rip his throat out. You
14 know, it may be in these but ---

15 Q: Do you remember what that was about?

16 A: You know, there's so much of it, it's hard to
17 remember exactly what it was all about.

18 Q: Did the counseling you received help you?

19 A: My health went down. I still suffer from it.
20 I'm on a -- I'm on two different medications.
21 I never was on medications again -- I mean,
22 before. Before I was an athlete. I was a
23 mountain biker. I gave it all up. I gained 20
24 pounds in anxious situations, I take
25 medications for that. So, yes.



1 Q: All right. Do you relate the stress and
2 anxiety to the work environment, or do you
3 relate it to Dr. Slayman?

4 A: The work environment, I was at the toughest
5 high school in Chester High -- I mean, Chester
6 County. I came in, and I straightened it up.
7 And that's where I made my name for myself.

8 Q: As a principal?

9 A: As a principal, yes. And Dr. Slayman knew that
10 when she came in. She came over and talked to
11 me about how well the high school was being
12 run. It was after I was under this impossible
13 situation that I -- my health went pretty
14 badly. And I've really still not recovered
15 from that.

16 Q: You mentioned transportation as one of the --
17 sort of one of your responsibilities?

18 A: Yes.

19 Q: Do you remember any incident related to
20 transportation that ---

21 A: Yes.

22 Q: Okay.

23 A: There was a situation where the employees were
24 promised a 3 percent raise, and the bus drivers
25 did not get the 3 percent raise. There were



1 two bus drivers who came over and wanted to
2 talk to Dr. Slayman. So they did. And I was
3 in on it -- on that meeting. And they were
4 cordial. They just wanted to know what was
5 going on. They weren't making but about 8 or
6 \$9 an hour, wanting to know why they were
7 gonna -- weren't getting their 3 percent raise.
8 So they were pacified. And when they left, she
9 said, call Jeanette Skinner, who is just
10 retired. At that time, she was probably -- she
11 was close to 70 years old, had been with the
12 district about 20 years. She said call and get
13 her over here right now. I said okay.
14 So I called her, got her over there. Jeanette
15 came in. Jeanette is the consummate
16 professional. They called her "The Law"
17 because she knows the law like nobody's
18 business. So she came in. And she said, Hi,
19 Dr. Slayman. She sat down. And Jeanette was
20 sitting like this (demonstrating). And
21 Dr. Slayman was sitting right there
22 (indicating). Dr. Slayman got right in her
23 face like that (demonstrating). She said,
24 Jeanette, if I find out that you sent those bus
25 drivers over here, I'll have your job for



1 inciting a riot. And I thought Jeanette was
2 gonna have a heart attack right there. She
3 turned -- she said, Dr. Slayman, I've never
4 been spoken to like that. You know I would
5 never done -- a loyal employee of the -- from
6 then on, she would call me. Jeanette would
7 call me and say ---

8 **MS. POLVI:** And I'm gonna object to this. This is
9 all hearsay.

10 **MR. WINBURN:** He was a witness to it.

11 **MS. POLVI:** That individual's not being called as
12 testimony about what she did or didn't say.
13 It's -- again, he's ---

14 **Q:** You observed her demeanor ---

15 **MS. POLVI:** These are statements that were out of
16 court, out-of-proceeding statements that are
17 being asserted as the truth of the matter of
18 what allegedly this woman is saying in response
19 to Dr. Slayman's alleged actions.

20 **HEARING OFFICER:** All right. You physically saw
21 what happened?

22 **THE WITNESS:** I did.

23 **HEARING OFFICER:** I think he can testify to what
24 happened.

25 **THE WITNESS:** Okay.



1 Q: What did Dr. Slayman do, based on Ms. Skinner's
2 response? Did she say I'm sorry?

3 A: Huh-uh, no, no.

4 Q: Did she ever apologize for it?

5 A: She said if it ever happened again, she would
6 have her job. She would have her job, that's
7 what she said.

8 Q: Did she say that in the presence of
9 Ms. Skinner?

10 A: Yes, she did. And me.

11 Q: Is it ever -- was it ever determined that
12 Ms. Skinner sent those ---

13 A: No. Ms. Skinner did everything that she could,
14 everything she could and had told me many
15 times, I try to keep my drivers from over
16 there. But some of those drivers wanted
17 answers. They wanted to know why.

18 Q: Was the matter ever resolved in terms of the
19 raise?

20 A: It was after Dr. Bain came in. They got a
21 raise.

22 Q: All right. Were you a witness to any specific,
23 what you would consider maybe, mistreatment or
24 charge statements towards Brooke Clinton or
25 Shawn Williams ---



1 A: I think it was ---

2 Q: --- come to mind?

3 A: One of the first cabinet meetings we had, I
4 think, is when she said that she told Shawn she
5 would cut her throat out, I think, during that
6 meeting.

7 Q: You were a witness to that statement?

8 A: Yes.

9 Q: Okay. How about -- any statements to Anna
10 Stroud come to mind?

11 A: I think -- nothing comes to mind right at the
12 moment.

13 Q: Okay. I'm on the last subject now, and we'll
14 try to get you out of here. How did -- can you
15 describe your role in, well, let me strike
16 that.

17 Can you describe what your involvement was with
18 executing that grievance and in issuing that
19 grievance to the board about Dr. Slayman?

20 A: Yeah. I had gotten to the point where I knew
21 that this could not go on. In fact, I went
22 ahead and retired with 25 years, 6 months. I
23 retired early because I thought that there was
24 gonna be some kind of indictment, that there
25 was gonna be some kind of legal action, that I



1 was gonna get drug into something and I was
2 gonna lose my retirement. I retired, and I
3 went on TERI for two and a half years.
4 It was -- I stay -- my entire career was at
5 Chester, 28 years. The last thing I wanted to
6 do at that point was cause trouble. But I also
7 knew I had to do something; not just for me
8 because my health was failing; not just for the
9 kids because they were not being protected by
10 the sheriff or anyone else; and none of the
11 training that was supposed to be done was being
12 done; and not just because all of the folks
13 that I worked with were under such tremendous
14 stress.
15 I just knew there was -- that this was going to
16 have to end. And I just -- I don't mind
17 telling you. I went to them. I said, look, if
18 we don't do something, this district is just
19 going to implode. And everyone agreed. And we
20 just -- we weighed it all out, and we knew it
21 was gonna be terrible, and we knew it was gon'
22 go on just like it's going on now. We knew it
23 was gonna be years of this, but we could not
24 take it any more.
25 That was why we did it. It was no other motive



1 for it. Nobody in that group had ever been
2 treated the way we had been treated, and we had
3 been good employees, good people, good people
4 that cared for the kids. And we had had all we
5 could stand. That's why.

6 Q: And did you ever think that you -- did you ever
7 consider share -- voicing your opinion to
8 Dr. Slayman directly before filing that
9 grievance?

10 A: You put out little feelers to see what would
11 happen, also watched others who had -- we had
12 a principal. I don't know if I can speak her
13 name. But we had a principal who had said, why
14 don't we pay our SROs more? And when she left
15 the office, Dr. Slayman said, we're gon' -- we
16 need to get rid of her. That was what she
17 said. I knew then -- and plus -- I mean, I was
18 so close to retirement. You know, I was right
19 there. I was hoping I could do 28 years. I
20 did not want to mess that up. So I chickened
21 out. I didn't -- I should have. I had wish I
22 had, but that's fine though when it came to
23 that point where we did what we did.

24 Q: Any other occasion where you remember it being
25 threatened by Dr. Slayman, your job being



1 threatened? Can you put a number on it? Did
2 this happen once or twice, or did this
3 happen -- how often did you think it --
4 something, some sort of forceful, negative
5 comment come from Dr. Slayman?

6 A: Well, when we got in a bind, if there was a
7 bind or there was some rumor going around that
8 was -- that seemed to be a threat -- so I mean,
9 that may happen once a week. But the real
10 anger, the real -- the really I'm gonna get you
11 and you didn't know if she -- you know, what
12 she was -- that wasn't as often. The times I
13 felt was actually that she did not have control
14 were probably, you know, two or three times, I
15 would say. But the other times there were
16 other -- there were times where it was just
17 implied.

18 MR. WINBURN: Any other -- I'd like to submit his
19 notes that he prepared. That's Exhibit 13?
20 No. I'm sorry. Is it 12?

21 HEARING OFFICER: 12, I believe.

22 MR. WINBURN: These documents, if there's not
23 objection, I'd like to submit those into
24 evidence.

25 MS. POLVI: And just so I'm clear, it's the 16 pages



1 of his notes that were already presubmitted,
2 right?

3 **MR. WINBURN:** Correct. Yes. Nothing that he read
4 from.

5 You may answer any questions Ms. Polvi asks.

6 **HEARING OFFICER:** Wait a minute. Any objections to
7 Petitioner's Exhibit 12?

8 **MS. POLVI:** No. He's testified they're his notes
9 that he supplied with his grievance.

10 **HEARING OFFICER:** Okay. All right. Then moved into
11 evidence.

12 **(Petitioner's Exhibit Number 12 was admitted into**
13 **evidence.)**

14 **MR. GARDNER - CROSS-EXAMINATION BY MS. POLVI:**

15 **Q:** Mr. Gardner, it will be my opportunity to ask
16 you some questions about the testimony you've
17 provided today and things that relate to the
18 accusations being lodged against Dr. Slayman's
19 educator certificate.

20 You and Charles King thought you could do a
21 better job running the district, didn't you?

22 **A:** I had no interest in running the district. Had
23 no interest in running it. I wanted the
24 district to be safe. I wanted to kids to be
25 safe. That was my interest.



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1 Q: And yet you've testified that you worked with
2 Dr. Slayman for years as her as your
3 superintendent, yet not once did you discuss
4 with her those concerns that now you've
5 testified about today and that you documented
6 in 16 pages?

7 A: I did. I did discuss it. I told her she
8 needed to meet with the sheriff. She said no.

9 Q: And you described -- and I quoted here your
10 testimony is that I'm gonna get you mentality.
11 Isn't the fact of the matter who's gone from
12 the district, Dr. Slayman, not you; isn't that
13 right?

14 A: Do you see where I am? Do you see, I am
15 teaching a carpentry class. Do you think I
16 would be teaching a carpentry class if my
17 career has stayed on track? No, it would not
18 have.

19 Q: Did anyone fire you from your job?

20 A: No, they did not.

21 Q: Did anyone tell you you had to resign?

22 A: They did not.

23 Q: So you voluntarily have selected to be a
24 teacher?

25 A: I voluntarily retired because I thought this



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1 was gonna get so bad that the district -- I was
2 going to get in trouble along with her. And I
3 think everybody else did too.

4 Q: And, in fact, you've testified that you,
5 indeed, lied, and you've alleged at
6 Dr. Slayman's instruction; isn't that right?

7 A: At her instruction, yes. I was a loyal
8 employee.

9 Q: And if you believed that anything that you were
10 being instructed to do is wrong, wouldn't you
11 have the responsibility, as an associate
12 superintendent, to voice concerns at the time
13 of anything that brought that much of a concern
14 to your mind?

15 A: No. Because my responsibility was to make sure
16 those kids were safe. And if I was there, they
17 were a whole heck of a lot safer than if I was
18 gone.

19 Q: So was it also your responsibility to write 16
20 pages of notes that spanned from January 2014
21 until you filed a grievance against Dr. Slayman
22 in September of 2015?

23 A: Uh-huh.

24 Q: Was that also your job?

25 A: Uh-huh. Yeah, yeah. I was keeping notes.



1 Q: And such ---

2 A: I'm not stupid. I'm gonna keep notes,
3 especially when I see things going the way
4 they're going.

5 Q: And such notes as demands loyalty and does not
6 give any. That's how you felt about
7 Dr. Slayman, isn't it?

8 A: That's true; it's not how I felt.

9 Q: And did you ever voice that to other people?

10 A: You didn't have to voice it. It was quite
11 obvious.

12 Q: And in here it states in your statement, we all
13 think that she's doing damage in the district,
14 parentheses, Brooke. Is that a statement you
15 made to Brooke or Brooke made to you?

16 A: We all was folks that were in the district
17 office. And, yes, we could see what was
18 happening to Brooke, especially with her
19 children, and how she was afraid of what might
20 happen to her children, especially once we made
21 our complaint.

22 Q: So that didn't answer my question. Who made
23 that statement?

24 A: Read the statement again?

25 Q: We all think that she is doing damage in the



1 district.

2 A: Oh, I'm sure I made it.

3 Q: Let's talk about Brooke. There's a statement
4 here also on page, I believe it's 6 of your
5 statement just below that. It says, had Brooke
6 drive her to an interview on her own time. Do
7 you have any personal knowledge about that?

8 A: Brooke told me.

9 Q: And did Brooke also tell you that actually the
10 drive that she had offered to take Dr. Slayman
11 was because she had a breast cancer scare?

12 A: You know, I don't know if I believe that or not
13 because I've heard other versions of that.
14 That might be what Dr. Slayman said. But I
15 don't know if I -- I would only believe it if
16 I saw and knew from Brooke that that was --
17 otherwise I'm going by what I was told.

18 Q: Well, I think that's very strong. So you draw
19 into question even that Dr. Slayman -- you're
20 accusing Dr. Slayman of lying about having a
21 breast cancer biopsy --

22 A: I'm not accusing her of lying about anything.
23 I'm saying there's a pattern of lies by this
24 woman. And I watched it every day. So, yes,
25 yes. I don't believe it unless I have all the



1 evidence in front of me to believe it.

2 Q: And how you did that was you went around to
3 every other leader within the school

4 district ---

5 A: No, ma'am.

6 Q: --- trying to recruit ---

7 A: No, ma'am.

8 Q: I haven't finished my question, sir.

9 A: Go head. You're making a statement. You're
10 not asking a question.

11 Q: In cross-examination, I'm allowed to.

12 A: Go ahead. And you're not making a question.
13 You're not -- you're making a statement, not a
14 question.

15 Q: So Dr. Gardner ---

16 A: And I did not do that.

17 Q: You went around to other leaders in the school
18 district recruiting them to also file
19 complaints against Dr. Slayman?

20 A: No, I did not. No, I did not.

21 Q: So when Charles King just testified before you
22 to say that you lead that ---

23 A: I didn't do that.

24 **MR. WINBURN:** Objection. Pitting.

25 Q: This testimony's already on the record.



1 **MR. WINBURN:** She's pitting one witness against
2 another. You can't do that.

3 **MS. POLVI:** I didn't even finish the question. But
4 most importantly, Charles King was just under
5 oath and testified to a certain effect. I'm
6 allowed to question him about it.

7 **THE WITNESS:** Any witnesses.

8 **HEARING OFFICER:** Ask the question.

9 Q: Is that if Dr. King testified that you were the
10 individual who orchestrated the grievance
11 against Dr. Slayman, would that be true or
12 false?

13 **MR. WINBURN:** Same objection.

14 A: Yes.

15 Q: Is it true or false? So as in, yes, it's true
16 or, yes, it's false?

17 **HEARING OFFICER:** I'm gonna allow the question.

18 A: All right. I am the one that said we need to
19 go ahead with this. Everyone was in the room
20 and said are we gonna to go ahead with it.
21 That was the five people that were in the
22 district office. And, yes, I did say yes
23 first. As far as getting the other
24 administrators to go to it, no, no. Everybody
25 was at the point of what do we do. And we all



1 asked in a circle, what are we doing? I said,
2 yes, that's what we've got to do. We've got to
3 make a grievance.

4 Q: So my point is, a circle had to have been
5 organized for it to have occurred. Were you
6 the person that organized this circle meeting?

7 A: It wasn't organized by one person. It was
8 just -- it just happened.

9 Q: So it just happened that the five senior
10 leaders all decided to file a grievance at the
11 same time?

12 A: Yep.

13 Q: That's your testimony?

14 A: Yep.

15 Q: On the same day?

16 A: Sure.

17 Q: Okay. So next I want to ask you about
18 information that Dr. Slayman was told. Are you
19 aware of Charles King proposing that he should
20 be responsible for areas that you oversaw?

21 A: I know he was responsible for areas that I
22 oversaw until I came in.

23 Q: Are you aware of Charles King telling
24 Dr. Slayman specifically that restructuring
25 should occur so that he oversaw areas that you



1 are presently overseeing?

2 **MR. WINBURN:** Objection. Not in evidence.

3 **MS. POLVI:** Well, I'm happy to recall. If that's
4 gonna be the case, I'm happy to recall him
5 after Dr. Slayman testifies.

6 **MR. WINBURN:** That's fine.

7 **MS. POLVI:** It's one or the other because I
8 definitely will ask this line of questioning,
9 and I will leave it to your selection.

10 **HEARING OFFICER:** Well, if we're gonna ask this, I
11 think we do need to call Dr. King. 'cause
12 that's not in evidence.

13 **MS. POLVI:** He's -- Dr. King testified that he
14 disagreed with that, but Dr. Slayman has
15 already -- you know, as part of the record that
16 we've already supplied, so then for me the
17 opportunity to ask each of the agencies'
18 witnesses about it is key because as I
19 described to you, they're each pitting each
20 other against each other when they're talking
21 to Dr. Slayman, but yet separately during
22 contemporaneous at the same time, they're
23 having an organized group to plan to file a
24 grievance against her.

25 **HEARING OFFICER:** I believe that Dr. King did not



1 testify to that. I did not hear that.

2 **MS. POLVI:** No. He declined -- he said that he
3 didn't do that.

4 **HEARING OFFICER:** Yes, he did.

5 **MS. POLVI:** But she will be able to testify to the
6 fact that he did.

7 **MR. WINBURN:** And that's fine. But the problem is
8 if it's presupposed to the witness that
9 Dr. King testified a certain way, that is
10 not ...

11 **HEARING OFFICER:** That's correct.

12 **MR. WINBURN:** And the way I phrased it is: Are you
13 aware of -- and -- is that Dr. Slayman has
14 already made these assertions, and so it's not
15 ultimately that the -- this ultimately is -- I
16 mean, it's a cross-examination, and this is
17 against a part -- an agency witness. I mean,
18 it's key for me to be able to establish what
19 their motives were and undermine essentially
20 their testimony.

21 **HEARING OFFICER:** I think you need to rephrase that
22 question.

23 **Q:** Were you aware of restructuring conversations
24 that were occurring with regard to senior
25 leadership with different leaders potentially



1 taking over supervisor position over others
2 within senior leadership of Chester County
3 School District?

4 A: You know, I -- taking over as if to take away
5 from, is that what you're asking? I'm trying
6 to figure out what you're asking. Because
7 there are plenty times that we joked around
8 about, man, you need transportation. You need
9 this. I mean, there -- what -- an organized
10 effort to take it from me, is that what you're
11 saying?

12 Q: Well, I think it's key to -- for me to follow
13 up on just the terminology just used. You say
14 you joked around about taking take over other
15 people's positions. I mean, so you are
16 agreeing that those conversations did occur,
17 that there's conversations talking about senior
18 leaders ---

19 A: Well, if we had ---

20 Q: --- taking over positions of other senior
21 leaders?

22 A: We had a -- if I -- if -- for instance, I had
23 a bus problem come in, something like that, and
24 it was a really tough one, and I'd say, man,
25 you need the bus -- you need transportation,



1 something like that. We would joke around.
2 But what you're implying is -- you seem to be
3 implying that he was taking it over because I
4 was not performing that job well? Is that what
5 you're saying?

6 **MS. POLVI:** I'm asking you. Are you aware of --
7 that any of those conversations occurring
8 between --

9 A: No. I'm asking you what are you implying.
10 What are you implying?

11 Q: Sir, the questions go one direction in this
12 scenario. So my questions in a
13 cross-examination are about questioning you
14 about what was going on at this time. So with
15 regard to ---

16 A: I don't recall.

17 Q: With regard to ---

18 A: I don't recall.

19 **MS. POLVI:** I would say this witness is not being
20 cooperative.

21 A: I don't recall.

22 **MS. POLVI:** And he's being coached by the agency not
23 to respond to this line of questioning.

24 **HEARING OFFICER:** I don't think he's being coached
25 by the agency.



1 **MR. WINBURN:** Objection. That ---

2 **HEARING OFFICER:** There's no reason for that. None.

3 Now, if he says he doesn't recall, he doesn't
4 recall. Let's move on.

5 **Q:** Your list of statements, 16 pages worth,
6 include blaming Dr. Slayman for traffic control
7 issues, statements to architects, warnings
8 about making faces at the board, salary
9 studies. Do you attribute all the problems of
10 the district to Dr. Slayman?

11 **A:** No, huh-uh.

12 **Q:** And when you provided this listing of
13 documentation, who solicited it from you, if
14 anyone?

15 **A:** I just came up with that list. That's just
16 from my notes.

17 **Q:** And who have you shared it with?

18 **A:** I don't know who all it's been shared with
19 actually. It wasn't something where I went out
20 and showed it around to anyone. It's was just
21 my notes.

22 **Q:** Well, Dr. Slayman was your supervisor. She had
23 several discussions with you about incomplete
24 projects under your supervision, did she not?

25 **A:** Incomplete projects. Can you give me an



1 example?

2 Q: Dr. Slayman asked you to perform the interviews
3 for the security team prior to the start of the
4 2015-2016 school year, correct?

5 A: Uh-huh.

6 Q: Sorry. Verbal for our court reporter.

7 A: Yes, uh-huh.

8 Q: With regard to those interviews, they were not
9 complete before the school year, correct?

10 A: That is correct.

11 Q: And you didn't do them because you did not
12 agree with the board's decision to hire
13 Defender, right?

14 A: No, ma'am. That's not true.

15 Q: Then what was the reason why they weren't done
16 on time?

17 A: Because there were not enough available
18 applicants.

19 Q: And those applicants included applicants from
20 all over the state, correct?

21 A: Correct.

22 Q: And you weren't ---

23 A: That is why we were instructed to just bring in
24 anybody and tell the board that this is a
25 permanent officer. There were not enough



1 applicants, so there was no way we could
2 complete those interviews.

3 Q: Did you report that to Dr. Slayman?

4 A: Uh-huh, she knew that.

5 Q: And how did you tell her that?

6 A: She knew it. She knew it before I knew it.
7 She was in ---

8 Q: And how did ---

9 A: She -- Defender. She talked to Defender all
10 the time. There were many conversations which
11 she said before. She said there were many
12 conversations I have with Defender that you
13 have not had. If I go down, you do down with
14 me. And she told Charles the same thing. I
15 didn't know what those conversations were. How
16 am I to do my job when I don't even know what
17 the conversations are that are going on about
18 my job.

19 Q: And you're testifying that she said I'm gonna
20 take you down with me or ---

21 A: Yes.

22 Q: --- something along those lines.

23 A: Yes.

24 Q: But isn't it the fact of the matter is that she
25 didn't? Is that you're saying all these



1 accusations, but yet nothing happened to you;
2 isn't that right? Your job continued? You
3 remained an associate superintendent?

4 A: Are you thinking about what you're saying? How
5 do you operate in an environment where somebody
6 says that to you where you're supposed to be
7 responsible for 775 teachers 5,500 kids' safety
8 and they're not including you in the safety
9 conversations. How are you supposed the
10 operate? You cannot operate.

11 Q: My question was that you say that she's
12 threatening your job, yet your job continued,
13 did it not?

14 A: Yes, it did.

15 Q: Dr. Slayman brought concerns to you about not
16 following up about Grazier Rhea land purchase,
17 correct?

18 A: That is the 19 hours of work that I had put in
19 on an easement six feet on each side of a ditch
20 that needed to be cleaned out.

21 Q: And that was at ---

22 A: I researched that back to the original land
23 grant. I went to the courthouse numerous
24 times. It did not matter what I said. They
25 were gonna build an apartment complex on six



1 feet of each side of a ditch. How was I
2 supposed to deal with that?

3 Q: Dr. Slayman asked you to follow up on it,
4 didn't she?

5 A: She did. And I did. And I've got extensive
6 notes on that, extensive notes.

7 Q: And it wasn't just Dr. Slayman asking because
8 she wanted to frustrate you, was it? It was at
9 the board's request, correct?

10 A: Originally.

11 Q: So you aware ---

12 A: Originally, yes.

13 Q: --- that the instruction was coming from the
14 board, not from Dr. Slayman?

15 A: Originally. And then it got really strange.
16 When we started talking about building an
17 apartment complex in over 12 feet of property,
18 yeah, it got really weird. And that wasn't
19 coming from the board. I tried to explain
20 that.

21 Q: Were you present during the board meetings?

22 A: (Witness nods head.)

23 Q: Verbal for the record, please.

24 A: Yes, uh-huh.

25 Q: And were you present during executive sessions?



1 A: Some.

2 Q: And how do you know that the board wasn't the
3 ones following up on a land purchase matter?

4 A: They did. They did purchase -- they were
5 following up on it. And I would present it one
6 time, and I would present it again, and I would
7 present it again. I spent numerous hours on
8 it. But it got to be ridiculous. There was
9 nothing I could say or do that would have
10 convinced Dr. Slayman that they weren't gonna
11 build an apartment complex over there or these
12 people weren't gonna try to steal our land on
13 this ditch, a ditch that ran through a property
14 that had been condemned. It -- that had --
15 full of mold and mildew. An old school built
16 back in the '40s and '50s. I did all I could
17 do. I did all I could do, and that was it.

18 Q: Well, clearly you have a opinion about it, but
19 isn't it accurate that whether you have an
20 opinion or not, if the board wants something
21 done, it needs to be done?

22 A: I did what the board asked me to do. I did
23 what the board asked me to do.

24 Q: And Dr. Slayman followed up with you about
25 concerns regarding the baseball field, didn't



1 she?

2 A: Uh-huh.

3 Q: Verbal for our court reporter.

4 A: Yes. Yes, ma'am.

5 Q: Did those type of problems end when Dr. Slayman
6 was no longer your supervisor?

7 A: It depends on which field you're talking about.
8 We have a lot of fields.

9 Q: With regard to superintendents following up
10 with you is my line of thought, so I can
11 rephrase the question. Is that -- did -- when
12 Charles King was the substitute, the interim
13 superintendent, when Keith Callicutt was the
14 interim superintendent and then Dr. Bain became
15 the superintendent after Dr. Slayman, did they
16 also have conversations with you about
17 follow-up about things under your supervision?

18 A: I mean, there's always conversations about
19 follow-up, but there were -- they're -- rare is
20 there a conversation about lack of follow-up on
21 my behalf, very rare. It's like I said, almost
22 my entire career I've had exemplary
23 evaluations.

24 Q: Do you recall describing to Dr. Slayman that
25 changes should be made to the supervision of



1 HR, finance, and technology?

2 A: At what point would I have had that
3 conversation? No, I mean I'm just asking

4 because it -- if -- like when -- with IT, I was
5 in on the hiring of the current IT director.
6 HR was already there when I came in. So I
7 mean, there were times where she would talk
8 about other people in the cabinet to us when
9 they weren't present about how she may not be
10 happy with their job performance, which I felt
11 was inappropriate. But I mean, I have -- I had
12 much more on my plate than to worry about most
13 of that.

14 Q: And you were part of a conversation or
15 conversations that occurred proposing that HR,
16 finance, and technology should move down a rung
17 in terms of the supervisory leadership
18 restructuring?

19 A: I could have been in the room. I mean, I could
20 have been in the room because we talked -- I
21 mean, we went through probably three
22 different -- nah, more than that -- scenarios
23 of how the chain of command; who was gonna be
24 over who. Whose salary was gonna get -- what
25 salary; this person shouldn't get that salary.



1 We did two or three different salary studies,
2 and those were torpedoed. We'd get halfway
3 thorough them. And then she would decide that
4 that person, more or less, should not be
5 getting this money if that person's not getting
6 this. We spend thousands of dollars. That's
7 easy. But, you know, we spent thousands of
8 dollars on that kind of stuff. So if I was in
9 on the conversation, I was in on the
10 conversation. As far as having any type of
11 gravity in the decision of that, no.

12 Q: With regard to the director of finance, you
13 reported to Dr. Slayman that she refused to
14 provide you necessary financial information; is
15 that accurate?

16 A: Oh, yeah, she did. There were times when she
17 did do that.

18 Q: And did you also inform Dr. Slayman that you
19 felt Anna Stroud was not competent in the
20 director of finance role?

21 A: I felt like she was competent; I just felt like
22 she had a communication problem. And I felt
23 like there were times where I did not -- I
24 didn't feel like she was communicating well
25 with us.



1 Q: And you had stated to Dr. Slayman that you
2 thought Anna Stroud should be fired?

3 A: I didn't think she should -- no. I didn't make
4 that kind of suggestion; no.

5 Q: Do you recall telling Dr. Slayman that you
6 thought she should be fired, meaning Anna
7 Stroud, 'cause she was not qualified for her
8 position?

9 A: No. I had a problem with that, because when I
10 began teaching, I had no degree. And I worked
11 my way up, despite not having a degree, going
12 to school at night. That didn't bother me.
13 That certainly didn't bother me. The
14 communication, her being able to actually
15 communicate financial information in an
16 understandable way was kind of tough.

17 Q: Did you describe to Dr. Slayman that Anna
18 Stroud was difficult to deal with in the
19 workplace?

20 A: I don't recall using those words; no.

21 Q: With regard to Shawn Williams, did you report
22 to Dr. Slayman that people in the school
23 buildings didn't like working with her?

24 A: Most people did. There may have been a
25 conversation where we were talking and some --



1 you know, someone had said that. And I had --
2 in conversation, I could have repeated that.
3 But most people did not say that. I mean, if
4 I was asked how would someone -- how does
5 someone feel about, say, Shawn, you know, I
6 wouldn't -- try not to lie about it. I mean,
7 you don't want to -- you know, somebody says
8 it, they said it.

9 Q: Did you complain to Dr. Slayman about Shawn
10 Williams not providing you complete information
11 that you needed for your job?

12 A: I may have. Yes, I think I did. Once I do --
13 I do remember doing that one time.

14 Q: And there's reference to like a breakfast club
15 in testimony?

16 A: Yes, uh-huh.

17 Q: Were you invited to attend the breakfast club?

18 A: This is ---

19 Q: Kind of a breakfast-before-work-type of thing
20 with some of the community leaders?

21 A: Well, we -- one time -- I know we ate breakfast
22 one time with Dr. Slayman and the rest of our
23 cabinet, but as far as that group, they might
24 have been there one time, as I recall. But I
25 don't -- I just don't remember 'cause that was



1 her thing. She did that. We were -- but we
2 were invited to have breakfast with her.

3 Q: And you testified about some statements that
4 you purport that Dr. Slayman made about, I
5 swear I'll kill him. Did you, at any point,
6 think that Dr. Slayman was gonna kill anybody?

7 A: Well, let me put it this way: If somebody says
8 I'm gonna commit suicide, we are trained at
9 that point to go to a counselor and say that
10 this person said they were gonna commit
11 suicide. They don't ask whether they were
12 laughing. They don't ask whether it was a --
13 in a joke. They said tell me who the student
14 is. I'll get them in here as quickly as we
15 can.

16 I'm a martial artist. I was a martial artist
17 for years and years and years. I've trained
18 people in personal safety for years. When
19 somebody says something like that in addition
20 to saying that they have a CWP and they carry
21 a weapon, yes, I take it very seriously. I
22 take that very seriously. Not everybody, not
23 the general public, but the biggest part of
24 self-defense is awareness.

25 It's not how much you know; it's not how you



1 can beat up somebody, all kind of stuff.
2 Self-awareness is it. And when those kind of
3 words are spoken, yes, I take it very
4 seriously. So if she says I'm gon' cut your
5 throat out, I'm gon' cut your knees out from
6 under you, when she says those kind of things,
7 yes, it went right to the heart. And I still
8 think about it.

9 Q: And you've testified that Dr. Slayman made
10 those statements?

11 A: Yep.

12 Q: But in your very answer, you even put it as
13 context is key?

14 A: Uh-huh.

15 Q: No word choice is perfect. But did Dr. Slayman
16 do -- make any type kill-you statement in terms
17 of actual threat or in terms of a joke?

18 A: I perceived it as something I could be --
19 should be concerned about. That's how I
20 received it. And I think any reasonable person
21 who was in the same situation who had heard
22 hateful speech from her before would perceive
23 it as something they needed to take serious.

24 Q: So was the first time you ever reported -- or
25 excuse me. Let me rephrase. The first time



1 you ever heard some kind of I'll kill you
2 statement, was that on September 8th, 2015?

3 A: That was about two weeks after when she said
4 she would cut my legs out. That was at Chester
5 High School, I believe, about two weeks after
6 she became superintendent. I was still a
7 principal then, as I recall, yeah.

8 Q: So if you were still principal years -- that's
9 years prior -- I mean, you were associate
10 superintendent ---

11 A: Uh-huh.

12 Q: --- since 2012.

13 A: Uh-huh.

14 Q: So if this was so alarming that it created a
15 hostile work environment, why in the world
16 would you wait three years to report it?

17 A: Why do people wait 30 years to report rape? I
18 don't know. Why do you? Because you got
19 circumstances. I had three kids, okay? I'm
20 raising three kids. I had two in college. I
21 cannot lose my job. That's the main reason.
22 I cannot lose my job. I was trying to figure
23 out a way to stay there, keep my kids safe,
24 keep my family intact and make sure that the
25 kids in this district are safe.



1 Q: Well, I think we just hit the nail on the head
2 with your testimony. Is why you filed this
3 complaint is 'cause you did not want to lose
4 your job. You felt your job was threatened.
5 So you do a proactive complaint before you
6 think you could get fired; isn't that true?

7 A: No.

8 Q: So ---

9 A: And I resent that. I think that's -- I think
10 for someone like myself, 28 years in education,
11 putting up with what I've put up with over the
12 years and trying to be a good example, to hear
13 something like that is insulting.

14 Q: Well, sir, that was your own testimony that you
15 were ---

16 A: No, ma'am. That what you turned it into. That
17 is not my testimony.

18 Q: Sir, your testimony speaks for itself.

19 A: You can turn it into that ---

20 **MR. WINBURN:** Let her finish.

21 A: --- but that is not my testimony.

22 Q: You specifically stated ---

23 A: I refuse --

24 Q: --- I didn't want to lose my job.

25 A: I refuse to accept that.



1 **HEARING OFFICER:** He said what he said.

2 Q: This testimony speaks for itself. Okay. So
3 Mr. Gardner, let's talk on that same line of

4 thought. You participated in the ouster of
5 another leader of the Chester County School
6 District, didn't you, who was your supervisor?

7 A: Who are you talking about?

8 Q: You told Dr. Slayman that you personally were
9 at fault for making sure that the prior
10 principal of Chester County -- excuse me --
11 Chester Senior High, Mr. Curtis Dunbar, was
12 fired because of you?

13 A: No, I did not.

14 Q: And you were the assistant principal when
15 Mr. Curtis Dunbar was the principal of Chester
16 High, weren't you?

17 A: I was, but I did not say that. Categorically
18 untrue.

19 Q: Nonetheless, I'm gonna ask you these questions.
20 So Mr. Curtis Dunbar was your supervisor while
21 you were assistant principal?

22 A: That's right.

23 Q: And after Mr. Dunbar left his position, you
24 received -- you were -- later became the
25 principal at the very same school, didn't you?



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1 A: That's right.

2 Q: And you benefitted from Mr. Dunbar no longer
3 being in his position?

4 A: Have you looked at Mr. Dunbar's personnel
5 record? I think you should do that. If you
6 really want to know what he did, if you want to
7 know what his leadership was about and that I
8 came up out of a carpentry lab without a clue
9 of what I was doing when I got to that school
10 and spent nights 'til 12:00 o'clock at night
11 trying to figure out curriculum and instruction
12 and redoing scheduling and figuring out what I
13 needed to do to turn that school around, I did
14 it.

15 Now, because I did it -- I did it because I
16 chose to, not because I wanted to be a
17 principal. I was given the option to go back
18 into the classroom. I almost did that. But
19 they asked me to be the principal. He left,
20 and they asked me. I was lost when I first
21 came in there, but I knew good people; I got
22 them in good positions; and they helped me turn
23 that school around.

24 Was that my plan? No. I did not -- in fact,
25 when I got my administrative degree, I didn't



1 tell HR for two years because I didn't want
2 them to know. I did not want to come out of
3 the classroom. They found out about it and

4 asked me to go be an assistant principal. No,
5 I did not plot against him. No, I did not want
6 to take his job. In fact, I went over to his
7 house and to his mother's funeral. I felt like
8 I was a good friend with him. But he made
9 terrible mistakes, horrible mistakes. And he
10 did himself in. There I was. I happened to be
11 in the right place at the right time, but it
12 was a -- it was an extremely tough job,
13 extremely tough.

14 Q: You bragged about ending Mr. Dunbar's career to
15 Dr. Slayman, didn't you?

16 A: Nope.

17 Q: Because Dr. Slayman brought performance
18 concerns to your attention, you feared you were
19 gonna lose your superintendent -- assistant
20 associate -- excuse me -- superintendent
21 position, didn't you?

22 A: Nope.

23 Q: You believe ---

24 A: Did not.

25 Q: --- that Dr. Slayman, once she was gone,



1 wouldn't be able to harm your position, would
2 she?

3 A: That is not true. That is not true.

4 Q: You saw her as a threat to your job?

5 A: Nope. That's not true. And I know that I was
6 advised to get out whenever all this was coming
7 down. Get out. You'd better go. You're gonna
8 get fired, all that. I said, no, I've been
9 here all this time. I'll just retire. I'll
10 start getting my TERI. If I make it a year,
11 I'll make it a year. If not, fine. I'm not --
12 they're not running me off. That's -- you
13 know, that's just what happened. I stuck to
14 it. I fully expected to, you know -- it wasn't
15 gonna turn out well, I'd probably get fired or
16 whatever. But that's the way it goes. I have
17 my principles.

18 Q: You wanted to keep advancing your career,
19 didn't you? You wanted to become a ---

20 A: Where am I gonna go? I had a -- I have a
21 masters in administration and a masters in ---

22 Q: Sir, that's not responsive to my question.

23 A: --- elementary education. I can't go anywhere
24 else. I can't go anywhere else.

25 MS. POLVI: Ms. Pike, that was a yes-or-no question,



1 he's not responsive.

2 A: Well, I can't go anywhere else. Don't know.

3 **HEARING OFFICER:** All right. Mr. Gardner ---

4 **THE WITNESS:** I'm sorry.

5 **HEARING OFFICER:** Answer yes or no.

6 A: Yes. I did not -- no -- I did not want to keep
7 advancing my career because I have nowhere to
8 go. I got to the point I totally maxed my
9 career out.

10 Q: So let's backtrack. So why you're assistant --
11 excuse me -- assistant principal, oh, you
12 didn't want to be principal; is that right?
13 And then you became principal, right?

14 A: My goal was not to be principal. I became
15 principal when Larry Heath came and asked me.
16 He said, will you be principal? I cannot do
17 anything else with Mr. Dunbar. Will you come
18 in and be interim. I said, yes, I will. I
19 went in to be interim. That summer I thought
20 that was pretty much it. That summer I went to
21 SCASA down at Myrtle Beach. I got a call from
22 Rita Stringfellow. She said, are you going to
23 put in for the principal's job? And I said, I
24 don't know. I said what do you -- I said I'm
25 not ready -- I don't know. She said put in for



1 the principal's job. I said okay. I'll put it
2 for it.

3 So I put in for it, and I got it. But if you
4 talked to anybody as far as did I have
5 ambitions to be a principal? No. I am back --
6 in fact, I'm back in the same job I started in
7 because I love it. And that's where I loved
8 being. And anybody you talk to will say he
9 loved being a carpenter instructor. That's
10 what I do.

11 Q: You had ambitions to be a superintendent,
12 didn't you?

13 A: I don't have the certification.

14 Q: My question was: You had ambitions to be a
15 superintendent, didn't you?

16 A: I did not pursue the certification, so that
17 should tell you that, no, I do not have
18 intentions to be a superintendent.

19 Q: You applied for a superintendent job
20 specifically when Dr. Slayman applied to be the
21 superintendent of the Chester County School
22 District, didn't you?

23 A: Applied to be? I was asked to be. I was asked
24 to come in as an interim.

25 Q: And during the application pool ---



1 A: That was ---

2 Q: --- you submitted your hat in the name, didn't
3 you?

4 A: It's in the newspaper. You can go back and
5 look in the Chester newspaper. They said Jeff
6 Gardner and Agnes Slayman. There it is right
7 there. I didn't have the certification. She
8 did. I was to be interim. If they wanted me
9 in there to be interim, I'll be interim. Then
10 I'll go back to whatever I would do.

11 Q: But the fact of the matter is you wanted to be?

12 A: No. If I wanted to be, I would have been.

13 Q: And you only withdrew your application once you
14 were told that you hadn't met the required
15 qualifications ---

16 A: No.

17 Q: Is that accurate?

18 A: Nope. They had a storm the night that they
19 were going to confirm me as interim. They had
20 a storm at the district office, knocked all the
21 power out. And after that, it was like three
22 or four weeks. Four or five weeks went by and
23 they were -- they secured Dr. Slayman, and it
24 is my understanding -- or secured something,
25 and I was perfectly fine with it.



1 MS. POLVI: Those are all my questions.

2 MR. WINBURN: None from the Department.

3 MR. GARDNER - EXAMINATION BY THE HEARING OFFICER:

4 HEARING OFFICER: Mr. Gardner, real quickly?

5 A: Yes?

6 HEARING OFFICER: I just -- I want to get a few
7 things straight ---

8 A: Okay.

9 HEARING OFFICER: --- so that I understand. I
10 understood that you were, first of all,
11 carpentry?

12 A: Yeah.

13 HEARING OFFICER: Just sort of take me through here,
14 okay?

15 A: Right.

16 HEARING OFFICER: 'Cause I'm confused. All right.
17 During that period of time, you were not at all
18 working with Dr. Slayman; is that correct?

19 A: No, ma'am.

20 HEARING OFFICER: Okay. So you were a carpentry
21 instructor?

22 A: Yes, ma'am.

23 HEARING OFFICER: All right. And give me a rough
24 time frame for that.

25 A: That was 1989 to 2005, I believe.



1 **HEARING OFFICER:** Okay. All right. And then from
2 carpentry instructor, you became assistant ---

3 A: And assistance principal ---

4 **HEARING OFFICER:** Principal?

5 A: --- and a teacher at the same time and then
6 full-time assistant principal.

7 **HEARING OFFICER:** Okay. And was that at a school
8 that Dr. Slayman was overseeing?

9 A: No, ma'am.

10 **HEARING OFFICER:** It was not. Okay. And so what
11 time frame are we talking about there?

12 A: That would have been 'til about 2007.

13 **HEARING OFFICER:** Okay. Then what happened? The
14 principal ---

15 A: Then the principal left in April, and I was
16 named interim principal.

17 **HEARING OFFICER:** Uh-huh.

18 A: And then that summer I interviewed for the
19 principal's job, yeah.

20 **HEARING OFFICER:** Okay. And so that was all in
21 2007?

22 A: Yeah -- yes, ma'am.

23 **HEARING OFFICER:** Okay. And then after become --
24 now were you involved with Dr. Slayman as a
25 principal?



1 A: Briefly.

2 **HEARING OFFICER:** In what capacity?

3 A: I -- she was the superintendent, and I was the
4 principal at Chester High School. So from like
5 two thousand ---

6 **HEARING OFFICER:** How long were you principal?

7 A: I was --- 'til 2012, I believe it was.

8 **HEARING OFFICER:** Okay. That make sense.

9 A: Yeah.

10 **HEARING OFFICER:** Okay. And so you became
11 associated with Dr. Slayman then when she took
12 the ---

13 A: Right.

14 **HEARING OFFICER:** --- superintendent's job?

15 All right. And then -- please correct me if
16 I'm wrong -- because she saw what you had done
17 with that school, then she encouraged you to
18 apply for the associate superintendent's job?

19 A: Yes.

20 **HEARING OFFICER:** Am I correct about that?

21 A: Uh-huh.

22 **HEARING OFFICER:** Okay. And you so you took that
23 job in 2012?

24 A: '12, I believe it was.

25 **HEARING OFFICER:** So that was shortly after



1 Dr. Slayman came to Chester?

2 A: Yes.

3 **HEARING OFFICER:** Okay. So during 2012, 2013 ---

4 A: Uh-huh.

5 **HEARING OFFICER:** --- would you say that things were
6 on a even keel or no?

7 A: Better, yes. They were -- I would say they
8 were okay.

9 **HEARING OFFICER:** Okay.

10 A: For the most part.

11 **HEARING OFFICER:** So the statements such as, I'll
12 cut her throat out or rip her throat out or
13 whatever, were those statements in '14 and '15?

14 A: They were actually -- the first time I heard
15 any kind of statement like that was not quite
16 as severe. It was when I was at Chester High
17 School. And it was, I'll cut the legs out from
18 under you.

19 **HEARING OFFICER:** So when you ---

20 A: And that was I was still principal.

21 **HEARING OFFICER:** Okay. So as principal from --
22 in -- that must have been in 2012?

23 A: Right. I believe that's correct.

24 **HEARING OFFICER:** Okay. Okay. And so then did you
25 hear any more of those types of comments in



1 2012 and 2013?

2 A: I would have to look at my time line exactly.
3 I know in '14 and '15 in particular it got
4 worse.

5 **HEARING OFFICER:** Okay. Interesting that she told
6 you that she would cut the legs out from under
7 you, but then she promoted you to the
8 associate ---

9 A: Uh-huh.

10 **HEARING OFFICER:** --- superintendent's position?

11 A: (Witness nods head.)

12 **HEARING OFFICER:** Were you cautious about applying
13 for it after that statement?

14 A: I was somewhat cautious, but things had not
15 transpired the way -- the number of things had
16 not transpired, and I, you know, give people
17 the benefit of the doubt at first. And after
18 I saw it going on and on is when -- in fact,
19 most of my notes were from late '13, '14, and
20 '15 when things started to deteriorate really
21 bad. And now -- up to then, I was just -- in
22 fact, on of our consultants that came in, he
23 came man and he said, man, I've just noticed a
24 real change in her, just a really big change in
25 her. And that was about the time that I was



1 starting to take some detailed notes about what
2 was going on.

3 **HEARING OFFICER:** Mr. Gardner, I have a question.
4 You know, I have -- I'm ashamed to admit
5 this -- but I've probably said this to my
6 husband before. I'm sure I have. I'm sure
7 I've been really frustrated with him and I've
8 said, look, you know, why did you do that? I'd
9 just like to strangle you.

10 A: Sure.

11 **HEARING OFFICER:** What are you thinking?

12 A: Sure.

13 **HEARING OFFICER:** I mean, do you think she said it
14 in that kind of light? Because certainly I'm
15 not gonna strangle my husband. But, I mean,
16 was it said in that kind of scenario?

17 A: I don't ever recall -- and I'm not trying to be
18 mean or cruel. I just don't ever recall her
19 relating to us in the way that you just did, in
20 a way that was cordial and laughing and ...

21 **HEARING OFFICER:** Oh, I probably wasn't laughing ---

22 A: Well, you know what I mean.

23 **HEARING OFFICER:** --- when I set it to my husband.
24 I can assure you but ...

25 A: Yeah. It had -- it was with venom. It was --



1 otherwise, you know, it was all part of that
2 building block of this is just all -- something
3 is going -- we all felt -- and, you know, I
4 mean, it's -- as bad as all this was, I hate
5 that it's all come down to this. But we all
6 felt that she -- and this is just my opinion --
7 we -- and their -- and others -- there was a
8 mental illness that was growing and that it was
9 getting to the point where it -- we no longer
10 could function because we could not get
11 definite answers for a problem that we had.
12 And there were really a lot of irrational
13 decisions going on that affected a whole lot of
14 people.

15 So when she would get so angry and she would
16 say those things in anger, it really started --
17 it started to concern us. Yeah, you can, you
18 know -- I -- like you said, I mean, you say
19 those kind of things and there is a
20 relationship you have and an understanding you
21 have with a person when you say those kind of
22 things. We had lost that relationship with
23 her, and we were fearful. We -- I mean, she's
24 not this big woman that's gon' come beat us up
25 or whatever, you know, and all that kind of



1 stuff, but to hear those kind of things in such
2 anger and with what seemed like this intent.
3 There was a time where she bragged on how one
4 of her' parents had said how mean her
5 grandmother was. That was the meanest woman,
6 mean, mean, mean. You know, and it was like it
7 was a bragging kind of thing. And it was so --
8 then I kind of wondered, well, is this how they
9 communicate at home. I was just trying to
10 figure it out. So I don't know. It was just
11 an awful thing.

12 **HEARING OFFICER:** Okay. Let me see what else I
13 might want to ask you. So was this grievance
14 executed after you had already retired and you
15 were on TERI?

16 A: I'm not sure. Gosh, I would have to check
17 that. I'm not sure. Right around the same
18 time. I'm not sure though exactly. I wanted
19 to, you know, go as long as I could. Then I
20 used all my sick days to try to help that too.
21 So I don't recall.

22 **HEARING OFFICER:** You were relating back -- I'm
23 going back to transportation issue with the
24 3 percent raise to the bus drivers.

25 A: Uh-huh.



1 **HEARING OFFICER:** I'm sorry. I missed this. Were
2 the bus drivers ever given the 3 percent raise?

3 A: They were. They were given actually more than
4 that by the new superintendent, the current
5 superintendent.

6 **HEARING OFFICER:** Okay.

7 A: And they may have been given something at that
8 point. You know, I don't wasn't -- I don't
9 recall, but it wasn't my ...

10 **HEARING OFFICER:** You mentioned in your testimony
11 that you were berated about Rick Hughes, that
12 Dr. Slayman had thought that Rick Hughes had
13 gone rogue. Why was Dr. Slayman berating you
14 about Rick Hughes? I'm confused about that.

15 A: Oh, no. She was talking to -- was it the
16 architect? -- she was talking to someone on the
17 phone about that he had gone rogue. Oh, shoot.
18 Let's see.

19 **HEARING OFFICER:** So if I understand this ---

20 A: Uh-huh.

21 **HEARING OFFICER:** --- your testimony wasn't that she
22 berated you; she was actually berating Rick
23 Hughes?

24 A: Right, uh-huh. Yes. I'm sorry.

25 **HEARING OFFICER:** Okay. One more question just in



1 terms of your ---

2 A: Okay.

3 **HEARING OFFICER:** --- chronology.

4 A: Uh-huh.

5 **HEARING OFFICER:** At what point did you go back to
6 becoming an instructor again?

7 A: This year.

8 **HEARING OFFICER:** So 2018?

9 A: Yes, ma'am.

10 **HEARING OFFICER:** So you continued to be the
11 associate superintendent after Dr. Slayman
12 left?

13 A: Yes. And that was changed to chief operations
14 officer. I mean, it was the same job, just a
15 different ...

16 **HEARING OFFICER:** Just different title?

17 A: Yes, ma'am.

18 **HEARING OFFICER:** And so were you able to finish out
19 your TERI then under ---

20 A: I did.

21 **HEARING OFFICER:** Okay. I don't have any further
22 questions.

23 Do either of you have any further questions?

24 **MS. POLVI:** Just real brief follow-up.

25 **HEARING OFFICER:** Okay.



1 MS. POLVI: Exhibit 16.

2 HEARING OFFICER: Exhibit 16 of whose?

3 MS. POLVI: For the Respondent's.

4 (Respondent's Exhibit Number 16 was introduced into
5 the record at this time.)

6 HEARING OFFICER: Okay.

7 MR. GARDNER - RECROSS-EXAMINATION BY MS. POLVI:

8 Q: Mr. Gardner ...

9 A: Uh-huh.

10 Q: This Exhibit 16 is a two-page document. The
11 second page is the copy of a card. It says, We
12 couldn't miss this chance to wish a boss as
13 nice as you good luck, success, and happiness
14 in everything you do. Have a wonderful Boss'
15 Day. And it's addressed from the senior
16 cabinet, and there's a statement that says
17 thanks for all you do, exclamation point, Jeff.
18 Is that, indeed, your signature?

19 A: Yes, it is.

20 Q: And then indicated by the first page of the
21 document, Dr. Slayman is responding to this
22 card with an e-mail to you and the other senior
23 cabinet individuals saying, thank you very much
24 for the gift card. Greatly appreciate your
25 thoughtfulness and support. It's a pleasure to



1 work with you. We make a great team. Did you,
2 indeed, receive that e-mail from ---

3 A: I did. Yes, I did.

4 Q: And this is dated October 17th, 2014. It
5 includes time frame that you're documenting
6 concerns with Dr. Slayman?

7 A: Uh-huh.

8 Q: Accurate to say though that, at least to her,
9 you're calling her a great boss?

10 A: Right.

11 Q: Those are all my questions.

12 A: Okay.

13 MR. WINBURN: None for me.

14 MR. GARDNER - EXAMINATION BY THE HEARING OFFICER:

15 HEARING OFFICER: Okay. Mr. Gardner, I have to ask.

16 A: Uh-huh.

17 HEARING OFFICER: Why? If you were that afraid,
18 why?

19 A: I know. Why would we do this?

20 HEARING OFFICER: Why would you do -- why Exhibit
21 16?

22 A: Uh-huh. Because if I hadn't signed that card,
23 I wouldn't be here today. I wouldn't -- there
24 was no way. There's no way that would have --
25 that would be definitely shown that I did not



1 care about her. It's not that I didn't care
2 about her. I mean, I'm -- it's common decency
3 towards people, especially my boss. And I
4 don't know of anyone that doesn't sign the
5 boss' card when it comes around ...

6 **MR. WINBURN:** Ms. Pike, if I may follow up real
7 quick?

8 **HEARING OFFICER:** Yes.

9 **MR. GARDNER - REDIRECT EXAMINATION BY MR WINBURN:**

10 Q: Yes. And I believe the testified just a minute
11 ago you don't want to be cruel.

12 A: No.

13 Q: Didn't you say that?

14 A: Yes.

15 Q: And why is that?

16 A: Well, I don't -- I mean, I may sound emotional.
17 I know. And that's -- I do sound emotional
18 about this. I do not hate her, dislike her.
19 There -- that is not it. That -- that's not
20 what's going on here. That never has been
21 what's going on here. What's going on is that
22 we cannot do our job. We could not do our job.
23 And my job was to take care of everybody. I
24 had to take care of every -- the kids' safety,
25 the teachers' safety. And I was not able to do



1 that. I was not able to do that. And I just
2 knew something terrible was gonna happen. And
3 I would have been much happier if things had
4 not turned out the way they did. But they did.
5 I've never had any animosity to speak of. I
6 mean, of course, it was emotional. But you
7 know, you forgive. You forgive. You try to
8 forget. You move on. I've got children. I've
9 got grandchildren. I've got a life to live.
10 I can't let this absorb me. I'll just -- you
11 know, I'll be glad when this is all done.

12 **MR. WINBURN:** Nothing else from me.

13 **HEARING OFFICER:** I don't have anything else.

14 **MS. POLVI:** Nothing further.

15 **(Off the record.)**

16 **(Witness excused.)**

17 **HEARING OFFICER:** All right. Ms. Williams, would
18 you let the court reporter swear you in,
19 please, ma'am?

20 **SHAWN WILLIAMS,** having been duly sworn, testifies as
21 follows:

22 **MS. WILLIAMS - DIRECT EXAMINATION BY MR. WINBURN:**

23 Q: Ms. Williams, please state your first -- full
24 name for the record.

25 A: Shawn Claire Williams.



1 Q: Will you tell us what you do?

2 A: Currently, I'm the chief human resource officer
3 for Richland School District 2.

4 Q: And how long have you been in the human
5 resources world?

6 A: This is year 19.

7 Q: How long did you work Chester County School
8 District?

9 A: For five years.

10 Q: And what was your position there?

11 A: I was the director of human resources and later
12 slated as the executive director of HR.

13 Q: Okay. And what span of time were you in
14 Chester?

15 A: In Chester from 2011, July 2011 until June 30th
16 of 2016.

17 Q: So were you there for the entire -- entirety of
18 Dr. Slayman's term as superintendent?

19 A: I was.

20 Q: Okay. And I handed -- I'll submit to you that
21 that is considered Petitioner's Exhibit 8. Can
22 you, which is the grievance document; is that
23 correct?

24 A: That is correct.

25 Q: And did you sign that document, I think it's



1 September 8th, 2015?

2 A: Yes, sir, I did.

3 Q: And in general, can you describe -- and I'll
4 ask more specifically later, but maybe just
5 tell us why you filed that grievance.

6 A: Just from concerns and the threatening remarks
7 that were made by Dr. Slayman.

8 Q: Okay. And can you give a few specific examples
9 of threatening remarks that you heard her say
10 to you or to others?

11 A: I can share with you an experience that I had.
12 In August we always have new teacher
13 orientation, and we invite board members to
14 come and join us. So in executive session, I
15 went and presented information. I was there as
16 needed, and I actually thanked the board
17 members for coming to participate.

18 Dr. Slayman, the next day in our cabinet
19 meeting, said to me in front of my colleagues
20 that I -- she would slit my throat if I ever
21 spoke to the board members again. And that was
22 in front of all of the board members -- I mean,
23 in front of the all the cabinet members. And,
24 you know, I was embarrassed.

25 I went back to my office, and I shared that



1 with my team and shared with them, and my BA
2 told me, who was an older person, older ---

3 **HEARING OFFICER:** What's your BA?

4 **THE WITNESS:** Benefits administrator.

5 A: Shared with me I needed to go back and tell
6 Dr. Slayman how I felt. Because my concern was
7 was that a teacher or anybody else could not
8 say that to anyone without being placed on
9 administrative leave. We would have definitely
10 placed that person on administrative leave.
11 She also stated that during that time, and she
12 shared this with all of the cabinet members,
13 that we were not to have any contact with board
14 members, and that they were to maintain a stone
15 face so when -- so when we were in board
16 meetings, we just needed to maintain the stone
17 face and basically look down and not have any
18 contact with board members.
19 So at that time I did go back and talk to
20 Dr. Slayman, and I shared with her the
21 information that -- I shared with her how I
22 felt. And she apologized and said she didn't
23 mean it that way, but I told her I did take it
24 that way, that I took it as a threat. I felt
25 that it was a threat. And, you know, a threat



1 for a student, for any employee, they would --
2 a student would have been expelled, and an
3 employee would have definitely been placed on
4 administrative leave that could lead to
5 termination.

6 Q: Not to put too fine a point on it, but do you
7 remember where you were sitting in proximity --
8 or if you were sitting -- to Dr. Slayman at
9 that meeting where she said that to you?

10 A: Sure. I always sit in the same spot all the
11 time, so I was sitting catty-cornered her --
12 right next to her. She'd always sit at the
13 head of the table. I would always sit right
14 here (indicating). So it was literally seat --
15 you know, right next to her. So I, indeed,
16 felt threatened.

17 Q: And it was not an occasion where he laughed it
18 off at the same time contemporaneous to the
19 statement? She wasn't joking, didn't appear to
20 be joking at the time?

21 A: It did not appear that she was joking at that
22 time.

23 Q: Okay. Do you recall any other occasion where
24 Dr. Slayman insulted you or others?

25 A: There were several times when she would just



1 say, you know, I would crucify them or rip
2 the -- her -- his or her throat out or, you
3 know, I'll kill them and -- and it's not
4 that -- I don't think she actually intended to
5 do it, per se, but that was the language that
6 she used.

7 Q: Right.

8 A: So I don't think she had any intentions on
9 ripping somebody's throat out or doing it, but
10 it was that she used that language that
11 shouldn't have been used.

12 Q: Can you describe -- on those occasions that you
13 just mentioned those various times, can you
14 generally describe what you observed about her
15 demeanor when she was making those statements?

16 A: Usually it would be something that maybe she
17 was upset about or someone didn't do as, you
18 know, as she thought they should have done or
19 this whole sheriff debacle that's -- was
20 really, you know, bad. It was just so bad that
21 it was just a lot of tension during that time
22 when they had the SRO transition and private
23 security transition. So it's just -- it was a
24 very tense time in the district during that
25 time.



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1 Q: Can you describe for us what sort of
2 interaction you had with the other employees
3 who signed the grievance in terms of whether
4 you discussed it, that -- a filing a grievance
5 together, whether you discussed it just that
6 day, or can you just set the scene for us on
7 how this came to be?

8 A: Well, truthfully, being an HR person, a lot of
9 people just come in your office and just vent.
10 And they just come in and vent. And at some
11 point collectively we just decided that -- you
12 know, what I would share is if you have a
13 concern, the process is to file a grievance.
14 This is the process. This is what the, you
15 know, policy says. But it just got so -- it --
16 constant, constant, constant -- that, either --
17 for me it was either we do it or stop talking
18 about it. So you just get to that point where
19 you feel like something has to be done.

20 Q: Can you describe -- when you say constant, were
21 you receiving -- were -- I'm sorry -- were
22 folks coming to you individually and confiding
23 in you on a regular basis? Or what do you mean
24 by constantly?

25 A: Yes. They would come -- well, maybe on a



1 weekly basis if something was said or if they
2 were -- or a principal complained about
3 something to one or maybe the assistant
4 superintendents. Would be concerns or, you
5 know, something that was said to them. And I
6 think that just the breaking straw was the
7 comment about Idaho being heaven was, you know,
8 the racial remark about being in Idaho and
9 feeling as if it was heaven. And when we have
10 a school system that's made up of all
11 demographics, you know, everywhere on earth has
12 to be heaven and not just one particular place.

13 Q: Do you remember who relayed that comment to you
14 of the Idaho-heaven comment?

15 A: Mr. Gardner shared that information with me.

16 Q: Okay. In general, would be -- would
17 Mr. Gardner or Dr. King, would they come to you
18 individually, or would they come together?

19 A: Most people would come to me individually.
20 They would just come and sit just because in
21 the HR you have a confidentiality where you
22 want to keep their conversation, their concerns
23 confidential, and they would come in -- you
24 know, people would come in separately to have
25 a conversation with me or just to, without



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1 call, to vent. And I think that's just
2 something that's occurred from either when I
3 worked in the HR industry up until now, people
4 just come in to vent.

5 Q: And did you, as HR director, share any guidance
6 or have any thoughts on approaching Dr. Slayman
7 as a group before filing a grievance?

8 A: There was many thoughts on would it work to
9 approach her, and I don't know that it would.
10 And it was just -- at some point, it's just we
11 had to put it on paper to make action happen.

12 Q: Who was it presented to? Maybe it's on there.

13 A: This was presented to the board chair at the
14 time, Ms. Denise Lawson.

15 Q: Okay. Were there other -- I suppose you can
16 share -- were there a complaints that were
17 brought to you by others, no matter who it was,
18 specifically about, you know, perceived or
19 actual mistreatment by Dr. Slayman of others,
20 whether it be a principal or teacher, anything
21 that sticks out?

22 A: Just principals who expressed concerns that
23 Dr. Slayman, in a meeting, stated that she
24 would kill them if they ever talked about the
25 security issue to anyone. And this happened --



1 actually she called a meeting during a --
2 before a recruitment fair. We had it on a
3 Saturday morning, and she called them all
4 together and stated that to them. So they were
5 a little taken back about the comment about her
6 saying that, you know, if you -- I would
7 kill -- basically, they shared with -- I'll
8 kill you if you talk to anybody about this
9 security issue.

10 Q: Switching gears just a little bit, I've got
11 some questions about FMLA. Let's see. Have
12 you had any involvement in any issue related to
13 FMLA with -- that related to any employees?

14 A: Yes. All FMLA is housed in HR, all the
15 determinations, and the information was kept
16 confidential on someone's health and medical
17 records. So that is housed in the human
18 resources office.

19 Q: And how does it work in general? Is it fair to
20 say that a doctor provides a diagnosis and
21 formally commemorates that in FMLA forms that
22 are supplied by the HR department?

23 A: A medical doctor or health care provider ---

24 Q: Uh-huh.

25 A: --- provides information. And they actually



1 don't have to put what the person's condition
2 is because that can be private. But what they
3 can do is put the symptoms that may have that
4 may cause them not to be able to work or if
5 they need intermittent leave or if they need
6 some accommodations. That is typically on the
7 FMLA form.

8 Q: And was there an issue that you were involved
9 in with Anna Stroud?

10 A: Yes.

11 Q: Okay. Can you tell me what your involvement
12 was with that?

13 A: Anna Stroud submitted FMLA with -- for a
14 medical condition. And, you know, I shared
15 with Dr. Slayman that he we did have FMLA
16 paperwork. I am mindful not to share that
17 person's condition. That person want to share
18 their own condition, they can. But as the
19 protector of the FMLA forms and their medical
20 records, I'm not at liberty really to share it
21 with anyone. So I did share that, you know,
22 she had been approved for FMLA; however, you
23 know, Anna was out on intermittent leave or she
24 would have to stagger her schedule based on as
25 needed based on how she was feeling. So there



1 was concerns from Dr. Slayman on Anna's
2 absences.

3 Q: Okay. Did she request any sort of
4 verification? That, being Dr. Slayman?

5 A: She did request verification of FMLA forms, and
6 I ultimately end up having to give her the FMLA
7 paperwork.

8 Q: All right. So the paperwork that you gave her,
9 was that out of Ms. Stroud's file?

10 A: It was out of her file, yes.

11 Q: Okay. So, again, not to try to put too fine a
12 point on it, is that literally pulling the
13 file, pulling the paperwork out, and handing it
14 to Dr. Slayman?

15 A: Taking her a copy 'cause she was on the
16 opposite side of the building; yes.

17 Q: Okay. Would you have kept a copy in her file?

18 A: Should be a -- should have been a copy in her
19 file, but I can't recall if there would, if I
20 just pulled the paperwork because of the stress
21 that it was causing just to go ahead and give
22 the paperwork; yes.

23 Q: Okay. Do you have any idea why Dr. Slayman --
24 did she say or did you know why she was
25 requesting this information?



1 A: Because Anna was out a lot or late for work.
2 However, I know personally Anna would come in
3 on the weekend and work, and she would work a
4 lot of late hours. So she may not have arrived
5 at work until 10:00, but she would still be
6 there at 6:00 or 7:00 o'clock at night to get
7 her time in.

8 Q: Were you privy to any other discussions about
9 Ms. Stroud and her FMLA -- strike that.
10 Were you witness to any other -- or you asked
11 by Dr. Slayman any more about Anna Stroud's
12 FMLA, other than her request for the file
13 documents?

14 A: I was not.

15 Q: All right. It's my understanding your office
16 was not in those suite of offices with Dr. King
17 and Mr. Gardner and Dr. Slayman. You were on
18 the other side of the building?

19 A: That is correct.

20 Q: All right. How often would you see
21 Dr. Slayman?

22 A: It varied. We always had a weekly meeting.
23 Sometimes I wouldn't see her, and some days I
24 would see her more than not. Some weeks I
25 would go maybe and see her maybe or twice



1 during the course of the week. But it varied
2 based on -- depending on the number of issues
3 that occurred during the course of the week.

4 Q: Okay. Any other occasion to observe
5 Dr. Slayman make fun of people, berate people,
6 treat people with disrespect that you can think
7 of?

8 A: Not at this time.

9 Q: All right. Any other occasion that she
10 threatened you, other than what you've
11 testified to today?

12 A: No, sir. Not -- no, sir. That was the only
13 time that she actually threatened me.

14 Q: All right. And after that conversation with
15 her, oh. I'm sorry. Strike that.

16 About when -- approximately when did she make
17 the statement that we've been talking about,
18 the throat slitting?

19 A: It was August 20 of 2013, because I went and
20 put it on my calendar in my office at that
21 time, put it on my electronic calendar and put
22 it in my notes.

23 Q: Contemporaneous almost to the statement itself?

24 A: Yes.

25 Q: Okay.



1 HEARING OFFICER: I'm sorry. August 20th?

2 THE WITNESS: August 20, 2013.

3 MR. WINBURN: Give me one second. I think that's
4 all I have. I think that's all I have. Thank
5 you, Ms. Williams.

6 HEARING OFFICER: Ready?

7 MS. POLVI: Ready.

8 HEARING OFFICER: Cross-examination?

9 MS. WILLIAMS - CROSS-EXAMINATION BY MS. POLVI:

10 Q: Ms. Williams I'll be able to ask you some
11 questions additionally as well. I want to pick
12 back up from kind of where we ended up with the
13 direct examination of the statement that you
14 identified as what you felt was threatening.
15 The only one that occurred during the time
16 frame was -- the context was something in
17 which -- and I'm paraphrasing -- but something
18 about slitting your throat, when I think you
19 testified that you didn't actually think
20 Dr. Slayman would actually make that act but
21 that you felt the statement, in and of itself,
22 shouldn't have been made?

23 A: I did, at the time, feel threatened because of
24 the tension in the room. That was -- I mean,
25 it wasn't a friendly conversation. It was



1 embarrassing. It was direct. She looked me
2 directly in my eyes and said, the next time you
3 speak to the board, I will slit your throat.
4 And her tone was not a happy tone, a nice tone.
5 Did I think she had a knife in her purse to do
6 it? No.

7 But the tone was threatening. It was extremely
8 threatening. It was extremely demeaning. It
9 was very demeaning to be in a meeting to be
10 told that by anybody at any level. I felt --
11 I did at the time feel threatened. Did I think
12 that she would do it? The answer is no. But
13 at the time, did I feel threatened?
14 Absolutely. Her tone, her demeanor absolutely
15 made me feel threatened.

16 Q: And I -- just connecting those two is that
17 afterwards you speak with some other
18 individuals within the HR team, and the
19 benefits administrator told you that you should
20 go talk to Dr. Slayman about it, right?

21 A: That is correct.

22 Q: And that -- and you did so?

23 A: Absolutely.

24 Q: And Dr. Slayman apologized and said she didn't
25 intend it that way; is that fair to your



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1 recollection?

2 A: Yes.

3 Q: And that occurred August 20th, 2013?

4 A: That is correct.

5 Q: And you and Dr. Slayman were able to continue
6 working successfully together up until
7 seemingly this grievance was filed; is that
8 right?

9 A: Well, what I did was I kept my distance. I
10 intentionally kept my distance and
11 intentionally almost would have a witness to
12 anything that needed to be said. So at that
13 point, it really changed the relationship from
14 me being able to see her as a supervisor who
15 could mentor me and me grow up under her to me
16 saying -- you know, now question her ability to
17 be able to -- for me to be able -- for her to
18 be able to lead me.

19 Q: And let's talk about context of when
20 Dr. Slayman made that statement. That was
21 related to some feedback that she had received
22 from the board saying that they felt you were
23 making faces at them; isn't that right?

24 A: I had not ever heard that before. This is --
25 that's new to me.



1 Q: Were you aware of the board contacting
2 Dr. Slayman about concerns about, like, your
3 mannerisms during board meetings?

4 A: I had never heard that before. That's new to
5 me.

6 Q: And with regard to the board, did Dr. Slayman
7 give you feedback about that they had
8 complained about you to her?

9 A: She did not.

10 Q: And do you ever recall receiving feedback about
11 just mannerisms about, like, appearing
12 condescending?

13 A: Never.

14 Q: Are you aware of that Dr. Slayman defended you
15 to the board and said that you were doing a
16 good job and should continue to be able to do
17 your job?

18 A: Never. I don't -- never recall a conversation
19 about that.

20 Q: Are you aware of or do you recall Dr. Slayman
21 saying that your mannerisms sometime made it
22 obvious that you didn't like to be questioned
23 but that didn't mean you weren't good at your
24 job?

25 A: No.



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1 Q: Was there a time that you were aware of where
2 HR reports that had previously been presented
3 by you to the board were then presented by
4 Dr. Slayman to the board?

5 A: Yes.

6 Q: Was that around this time?

7 A: No, it wasn't. It was after that time. I
8 would say maybe some months later when we
9 stopped going -- everybody stopped going into
10 the executive session.

11 Q: And after this event occurred on August 20th,
12 2013, one of the documents that we have in the
13 record is Exhibit 16, which is a Boss' Day
14 letter. Do you recall giving a boss -- a
15 letter to Dr. Slayman saying she was a
16 wonderful boss?

17 A: I don't recall it. I mean, I can look at see.
18 I mean, I'd be glad to look at it.

19 Q: And actually Mr. Gardner accidentally took my
20 copy -- or the other copy, so I have to make
21 sure I take this one back.

22 A: Absolutely. Okay. And I notice on here it
23 says enjoy -- signed my name. It says enjoy
24 your day, Shawn. You got the front of the --
25 it says good luck, success, and happiness in



1 everything you do. Have a wonderful Boss' Day.
2 It is customary that we give cards during
3 occasions for Administrative Professional,
4 Boss' Day, Christmas. So that is not uncommon
5 for us to give cards as such.

6 Q: But would it be disingenuous to tell
7 Dr. Slayman in a card that you felt she was a
8 wonderful boss if you didn't agree with it?

9 A: I don't recall -- I don't think that that said
10 that. I think it said have -- if you can read
11 back over that one more time -- have a
12 wonderful day or ---

13 Q: Couldn't miss this chance to wish a boss as
14 nice as you good luck, success, and happiness
15 in everything you do. Have a wonderful Boss'
16 Day.

17 A: Okay. Yeah. Have a wonderful Boss' Day. I
18 mean, truthfully when Boss' Day cards come
19 around, we sign them. That is, again,
20 customary. It's customary. That is the polite
21 thing to do. Is to be plight to do that.

22 Q: And when we look at the time frame from the
23 statement that you said you found offensive on
24 August 20th, 2013, you didn't file a hostile
25 work environment complaint until September 8th,



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1 2015. Who, if anyone, prompted you to file
2 that grievance on that date?

3 A: Any decision that I make, I solely make as an
4 individual. So no one prompt me to make any
5 decision. So I stand as an individual, not as
6 someone prompting me to make a decision.

7 Q: You asked Dr. Slayman to recommend you for a
8 comparable head HR position, correct?

9 A: That is correct.

10 Q: And Dr. Slayman did that, didn't she?

11 A: That is correct.

12 Q: They wrote you a glowing recommendation?

13 A: Yes, ma'am, she did.

14 Q: And she submitted that to -- at your request to
15 districts in the Lexington-Richland area?

16 A: That is correct.

17 Q: And she even e-mailed you a copy of what she
18 relayed?

19 A: That is correct.

20 Q: Would that be the same type of thing someone
21 who is subjecting you to a hostile work
22 environment would have done?

23 A: I think at that time Dr. Slayman would have
24 probably been excited for me to leave the
25 district. So, you know, I think that sometimes



1 references were given that aren't always --
2 that -- you know, I was never told that I
3 wasn't doing a good job, and I think it is
4 customary for is someone asks you person, for
5 a person to write you a reference.

6 Q: And the glowing reference that Dr. Slayman gave
7 you, was there any reason that you are aware of
8 that she would not have been telling the truth
9 within that reference?

10 A: That is the -- should -- that is correct.
11 There was nothing that I would have known that
12 would have caused otherwise -- been otherwise
13 known that.

14 Q: When the September 8th, 2015, grievance
15 occurred, were you also in contact with Rick
16 Hughes and Denise Lawson about submitting such
17 complaints about Dr. Slayman?

18 A: I was not in contact with Denise Lawson or Rick
19 Hughes.

20 Q: Who initiated you in terms of being interviewed
21 by Betty Bagley?

22 A: I was contacted to meet with Ms. Bagley, and I
23 can't recall exactly who scheduled that
24 meeting.

25 Q: But it was someone other than Ms. Bagley?



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1 A: That is correct.

2 Q: Accurate to say that when Ms. Bagley was asking
3 you about Dr. Slayman, she was asking you for
4 negative information?

5 A: That is not correct. She asked to share -- for
6 us to share any information from me
7 individually. I can only speak for myself.
8 She asked individually for me to just share
9 my -- share anything that I would like to have
10 shared.

11 Q: And wouldn't that -- when you did that you
12 submitted a two-page document that has 13 items
13 listed?

14 A: The evidence sheet that would have -- had
15 shared information -- I'm not certain exactly
16 what sheet that would have been just right
17 offhand. Do you have that sheet for me to ---

18 Q: Refresh your recollection purposes?

19 A: Absolutely.

20 Q: Let's see if you were the author. I believe
21 you are, but you need to confirm.

22 A: Yes. This is something that I -- this looks as
23 if something that I would have written.

24 **HEARING OFFICER:** And what exhibit is that, please?

25 **MS. POLVI:** Actually, let me borrow it real quick.



1 This is -- 'cause I was waiting to see if we
2 needed to. I don't need to put in the rest of
3 Exhibit 1. This is part of Exhibit 1 that was
4 the Agency's production to us. Unfortunately,
5 it's a stack. So if you look at the -- I think
6 what we could do is even take the sticker off
7 the first page and we could just make this
8 two-page document Exhibit 1.

9 **(Respondent's Exhibit Number 1 was introduced into**
10 **the record at this time.)**

11 **MR. WINBURN:** Yes, ma'am.

12 **MS. POLVI:** And just move out -- but just to help
13 everybody for identification purpose. It's
14 behind the Exhibit 6, that page within the
15 packet. It's kind of confusing.

16 **HEARING OFFICER:** Okay. Wait just a second here.
17 Okay. I'm not seeing anything that says
18 Exhibit 6.

19 **MS. POLVI:** I'll help you. It's towards the
20 beginning maybe about, give or take, 25 pages
21 in.

22 **HEARING OFFICER:** Okay.

23 **MR. WINBURN:** I've got it if you want to use this
24 one.

25 **HEARING OFFICER:** I've got Exhibit 5. Hang on. So



1 Exhibit 6 has got to be back there.

2 **MR. WINBURN:** 13 items. I got it all the way up to
3 9. How did I do that? Exhibit 6, right?

4 **MS. POLVI:** Right.

5 **HEARING OFFICER:** Found it. Okay. And we're gonna
6 take this out, and we're going to make this ---

7 **MS. POLVI:** Yeah. We'll just make this two-page
8 document the stickered Exhibit 1.

9 **HEARING OFFICER:** And so we're not admitting all of
10 this (indicating)?

11 **MS. POLVI:** Right.

12 **HEARING OFFICER:** Or we don't know yet?

13 **MS. POLVI:** If I have any more out of that, well I
14 guess we could make it at the end like 20-some
15 or whatever number we're at.

16 **HEARING OFFICER:** Okay. Let's go off the record for
17 just a second while I ...

18 **(Off the record.)**

19 **Q:** So, Ms. Williams -- and I think you identified
20 this document, two pages numbered 1 through 13
21 of some different items. You're the author?

22 **A:** That is correct.

23 **Q:** Did anyone else assist you with drafting?

24 **A:** No, they did not.

25 **Q:** Okay. Did you draft it before or after the



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1 interview with Betty Bagley?

2 A: I can't recall.

3 Q: And was it for the purpose of providing
4 information to her?

5 A: I cannot recall.

6 Q: And I'd be happy to hand it back over to you.
7 But Number 4, you reference concern about not
8 receiving a raise. Do you recall that?

9 A: If I can have the ---

10 Q: Sure.

11 A: --- document in front of me? So that way I can
12 identify what you're sharing. Thank you.
13 Okay.

14 Q: So I don't think I got your answer.

15 A: So what is your question?

16 Q: Accurate to say you were upset that you had not
17 received a raise?

18 A: I was, of course, disappointed that I did
19 receive a raise. That is correct.

20 Q: Shortly before you filed the grievance on
21 September 8th, 2015, in the latter part of the
22 summer 2015, Dr. Slayman was looking for you in
23 the district office on a particular day; do you
24 recall that?

25 A: I do not recall.



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1 Q: Are you aware of a time where Dr. Slayman was
2 contacted by a principal who'd been trying to
3 get ahold of you and couldn't find you?

4 A: I do not recall.

5 Q: Do you recall a day where Dr. Slayman spoke
6 with your staff asking where you were and that
7 they had reported to her that you hadn't
8 reported to work yet and hadn't called?

9 A: I do not recall. But I will recall that I had
10 taken -- I had lost -- I lost 14 vacation days
11 because I was unable to take off. So I do
12 recall years where I would lose vacation days
13 back to the district that I was unable to take
14 time off. So, no, I do not recall not being in
15 the office.

16 Q: Shortly before you lodged a complaint, do you
17 recall Dr. Slayman having a discussion with you
18 reminding you that if you were to take a day
19 off, you needed to notify her?

20 A: I do not recall. I was rarely absent. Even --
21 unless it was the time that I was in a coma and
22 my mom called for me. Other than that, there
23 was -- I rarely missed work. And I was
24 scheduled -- the doctor had told me to take off
25 the entire week. My lungs collapsed while I



1 was working in Chester. So, yeah, it may have
2 been that Monday when I was unable to call
3 because I was on life support. So maybe it was
4 during that time when she was looking for that
5 that someone was looking. But there is -- and
6 I came back two days early. I was supposed to
7 be scheduled off the entire week.

8 Q: I'm not talking about that incident.

9 A: So -- so ---

10 Q: I'm talking around August of 2015.

11 A: No. That was -- there is never a time that I
12 am off of work. There -- it's just that --
13 even now. I just don't miss work. That's not
14 something that I do.

15 Q: Is there a time in August 2015 that Dr. Slayman
16 reminded you that if you were gonna be out you
17 just needed to tell the district so they'd have
18 somebody to cover if an HR issue arose if you
19 were out?

20 A: No. There was never a meeting that occurred
21 that said that.

22 Q: Well, not a meeting but a conversation?

23 A: That was never a conversation because I was
24 always accessible.

25 Q: And if Dr. Slayman were to perceive you as



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1 being a no-call/no-show, wouldn't that be her
2 right as your supervisor to question you about
3 that?

4 A: Absolutely.

5 Q: And if Dr. Slayman did, indeed, question you,
6 she would be able to reprimand you if it was a
7 no-call/no-show?

8 A: Absolutely.

9 Q: And based on your testimony about vacation
10 days, were you upset with Dr. Slayman if she
11 questioned any of your leave time?

12 A: She never questioned any of my leave time
13 because, again, there was very few occasions
14 that I did take off.

15 Q: Were you aware of any conversations that either
16 Jeff Gardner or Charles King had with
17 Dr. Slayman about reorganizing the senior
18 staff?

19 A: I was not.

20 Q: And who was the first person to initiate this
21 September 8th, 2015, grievance document that
22 you're one of the five signators?

23 A: I can't recall.

24 Q: Are there times where you and the other
25 individuals who are the signators met and



1 discussed negative things about Dr. Slayman?

2 A: At some point, yes.

3 Q: You're -- I think you testified the currently
4 the chief HR in Richland School District 2?

5 A: That is correct.

6 Q: And Allison Hanna helped you find that job?

7 A: That is not correct.

8 Q: Accurate to say that you're very close with
9 Allison Hanna?

10 A: She was our attorney in Chester. That is
11 correct. She was an attorney in Chester. So
12 I had a client-attorney relationship.

13 Q: Isn't it true that you helped plan her
14 grandmother's funeral?

15 A: That is not correct.

16 Q: Have you also spent, outside of the
17 professional interaction, social time with one
18 another?

19 A: Other than seeing her at conferences, that's
20 the only time that I have seen Allison outside
21 of work. The conferences are inclusive of
22 work. And I did attend her grandmother's
23 funeral.

24 Q: With regard to your experiences as a human
25 resources supervisor, wouldn't it be



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1 appropriate for in this type of situation where
2 all five of the senior staff, as indicated by
3 the Boss' Day signature card, it says senior
4 staff and it's the five stated signators,
5 wouldn't it be fair to say that you should
6 have gone to Dr. Slayman to talk with her
7 before taking action to formally file a
8 complaint against her?

9 A: It would have been ideal; however, you know,
10 just based on the current environment, I don't
11 think that that was an option. It was -- the
12 option was to go ahead and share -- file a
13 grievance. If you look at a grievance, what it
14 says is that you actually file it to the
15 supervisor. So if a -- you file a grievance
16 and you're a teacher, then you file -- you
17 submit the grievance to your principal in their
18 HR office.

19 Well, Dr. Slayman's supervisor was the board
20 chair and the board, so that's the process in,
21 you know, which you would file a grievance if
22 you had a concern.

23 Q: And you're aware of, because of your position,
24 that once a grievance was filed by the five
25 senior cabinet, it was gonna very negatively



1 impact Dr. Slayman's career?

2 A: No. Not necessarily. I mean, yeah, I don't
3 know what's -- what the outcome would be.
4 Grievances are typically kept confidential. So
5 that's not something that is typically made
6 know to the public, something that typically
7 you can work out within, you know, within the
8 district or within the principal-supervisor or
9 the superintendent-supervisor relationship. So
10 not necessarily that it would have an impact on
11 her professionally.

12 Q: And you and the other individuals who made this
13 complaint, the complaints that you lodged were
14 ultimately given to the media. Do you know who
15 gave your complaints to the media?

16 A: I do not.

17 Q: Were you one of the individuals?

18 A: No, I was not.

19 Q: Other than Betty Bagley and the other
20 signators, did you ask anyone else to
21 participate in signing that document, the
22 September 8, 2015, grievance?

23 A: I did not.

24 Q: And I note that on the document Charles King's
25 signature is in one color ink and the four



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1 other complainants, yourself included, are in a
2 different color ink. Were you present when the
3 other individuates signed?

4 A: I was not.

5 Q: And who had the document that brought it to
6 you?

7 A: I can't recall.

8 Q: And during your career in the education field
9 throughout the different positions that you've
10 held, have you ever been a party to a
11 group-type of complaint like this before?

12 A: No, I have not.

13 Q: With regard to the impact it would have, you,
14 as a head HR of a school district, what do you
15 think that impact would have?

16 A: I have no idea. That's -- I don't know.

17 Q: With grievances that you've been essentially
18 not a party to like such as this one but have
19 heard in terms of a HR capacity, how many would
20 those be?

21 A: None that I'm aware of.

22 Q: Well, let me rephrase that. I'm not sure --
23 it -- that might be accurate, but I might have
24 asked a bad question. Is it -- have you been
25 aware of other types of grievances, meaning in



1 your HR positions of other employees, not
2 necessarily against Dr. Slayman. I just mean
3 generally throughout your HR career.

4 A: Yes.

5 Q: How many would those be?

6 A: Maybe over the last 19 years, maybe 20.

7 Q: And how have those 20 resolved?

8 A: Differently. I mean, it has a different
9 outcome for each situation. So, you know,
10 different -- each situation is different.

11 Q: And I look at the second paragraph of the
12 grievance states, we are requesting a
13 closed-door meeting of the board as a group to
14 present our concerns to the board trustees. We
15 respectfully request that Dr. Slayman not be in
16 attendance during the meeting. What happened
17 during that meeting? Well, first, is it -- a
18 meeting did occur, did it not?

19 A: A meeting occurred; however, at that meeting,
20 our information was not shared during that
21 time. A meeting occurred at the board meeting,
22 but it wasn't where we actually shared our
23 concerns.

24 Q: When you met with Betty Bagley, about how long
25 was that meeting?



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1 A: I can't recall.

2 Q: More or less than an hour?

3 A: I can't recall. I truly can't recall how long
4 it was. I can't recall if it was 30 minutes,
5 45 minutes, or a hour. At this time, I can't
6 recall.

7 Q: What response did you get to your September 8,
8 2015, grievance from the board?

9 A: I didn't get a response back in writing, so I
10 did not get -- receive a response back in
11 writing.

12 Q: What type of response did you receive other
13 than by writing?

14 A: It was just information that was at the board
15 meeting where I think a motion was made -- I
16 can't remember who made the motion and -- about
17 Dr. Slayman's employment with the district.

18 Q: And did anyone present in terms of the five
19 grievants at the grievance hearing that you
20 were present?

21 A: Al Nichols presented for us at this meeting.

22 Q: And I understand he was in some kind of legal
23 capacity, so I'm gonna preface before my next
24 question, not asking for any conversation you
25 had had with him, just in terms of was he hired

