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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 SlaymanAppellant

v.

South Carolina Department of EducationRespondent.

RECORD ON APPEAL - VOLUME III

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1 by you to represent you for that grievance or
2 through SCAA?

3 A: As members of any SCAA, PSTA, there's legal
4 representation that is afforded with that
5 membership.

6 Q: Were you aware of any other employees being
7 asked to sign -- to attest to the hostile work
8 environment grievance that you were a party to?

9 A: I was not. I do not know of anyone else that
10 was asked to sign.

11 Q: Were you aware if Callie McConnell being asked
12 to sign?

13 A: I was not.

14 Q: Were you aware of her not declining to be a
15 part of this grievance?

16 A: I was not.

17 Q: Were you aware of her concerns that she was
18 being ostracized for not agreeing to be a a
19 part of the grievance?

20 A: I was not.

21 Q: And just for clarity of the record, Callie
22 McConnell was Dr. Slayman's secretary?

23 A: That is correct. Actually, her administrative
24 assistant.

25 Q: When was the decision made to submit this



1 September 8th, 2015, grievance, at least by
2 you?

3 A: Would have been September the 8th when I signed
4 that. That was when I committed to filing the
5 grievance.

6 Q: When did the conversation start that there
7 would even be such a grievance?

8 A: I can't recall.

9 Q: But fair to say that it -- it hadn't started
10 as of August 20th, 2013?

11 A: I can't recall.

12 Q: Well, Ms. Williams, we got to have some more
13 time stamp from that. That's two years in
14 between, so we've got to help Ms. Pike out out
15 in determining when you first though about when
16 you were gonna file a hostile work environment
17 complaint?

18 A: Look, if it was signed September the 8th, 2015,
19 I would say sometime in the year of 2015.

20 **MS. POLVI:** Those are all my questions.

21 **MR. WINBURN:** Okay. I have a couple of follow-ups.

22 **HEARING OFFICER:** Okay.

23 **MS. WILLIAMS - REDIRECT EXAMINATION BY MR. WINBURN:**

24 Q: Did you ever witness Dr. Slayman threaten to
25 rip Callie McConnell's head -- rip her throat



1 out?

2 A: No.

3 Q: Okay. And you were asked about grievances
4 filed to you as an HR director and their
5 outcomes. Do you know if the board -- do you
6 know of my response from the board in
7 connection with your grievance?

8 A: I did not receive a written response or a
9 verbal response from the board, only the action
10 that was taken at the board meetings.

11 Q: Are you aware of any improvement plan that they
12 suggested or proposed for Ms. -- Dr. Slayman?

13 A: I'm not -- through hearsay but not ---

14 Q: We don't want ---

15 A: Not from actual ---

16 Q: Okay.

17 A: Not from actual documentation.

18 Q: All right. Who would know that, what the board
19 proposed? Would that have gone through HR
20 necessarily?

21 A: That would not have because the superintendent
22 is the employee of the board.

23 Q: Okay.

24 A: So their personnel actions would have taken
25 place through the sitting body of the board.



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1 Q: All right. And these -- this Exhibit 1 that
2 we've been talking about, these are your notes?

3 A: Yes, sir, they are.

4 Q: And you have read through them?

5 A: Yes, sir.

6 Q: And you are submitting that they are accurate?
7 That's your accurate recollection?

8 A: Yes, sir.

9 Q: Thank you.

10 **MR. WINBURN:** That's all I have.

11 **HEARING OFFICER:** I've got a couple questions for
12 you.

13 **THE WITNESS:** Yes, ma'am.

14 **MS. WILLIAMS - EXAMINATION BY THE HEARING OFFICER:**

15 **HEARING OFFICER:** Ms. Williams, being the HR
16 director, I know that you said that when
17 Dr. Slayman addressed you in a manner that you
18 thought was inappropriate, you went back to her
19 and talked to her, which I think is awesome.
20 Did you ever contemplate, being the HR
21 director, going back to her and saying,
22 Dr. Slayman look, you know, I am hearing these
23 things, and people are disgruntled about them.
24 Is there something we can do here to perhaps
25 help the morale here and make people feel for



1 valued, as opposed to being belittled?

2 A: I didn't feel comfortable saying that. I truly
3 didn't. At that point, I could -- I didn't
4 feel comfortable saying that.

5 **HEARING OFFICER:** Were you every afraid that you
6 were going to lose your job?

7 A: I just didn't know what I was gonna get or the
8 person that I was gonna get day to day. One
9 day Dr. Slayman would be the nicest person
10 ever. Then one day if she's upset, she's upset
11 all day. And it may be something that somebody
12 else did or someone said. So it was really --
13 you just didn't know what you was gonna get.

14 **HEARING OFFICER:** Did Dr. Slayman ever approach you
15 about wanting to take a personnel action
16 against some employee?

17 A: Against some employee -- yes. Anna Stroud in
18 particular, she didn't care for her -- more so.
19 And part of that, I think, is because Anna
20 didn't have a degree.

21 **HEARING OFFICER:** Okay.

22 A: And she felt that Anna didn't have a degree,
23 and Anna was our director of finance.

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

25 A: And my stance was always Anna had been doing



1 the job for a number of years, and our reports
2 that -- they would come in and do our audit
3 reports -- were always excellent reports and in
4 good standing. So there was always concerns
5 that because Anna didn't have a degree in -- I
6 just think that her work merits had just kind
7 of stood for what they were.

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

9 A: Because sometime it says equivalency ---

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

11 A: --- and your years of experience can sometime
12 be the equivalency.

13 **HEARING OFFICER:** Sure. So did you express those
14 concerns to Dr. Slayman when she brought those
15 to you?

16 A: I did not. I did not.

17 **HEARING OFFICER:** Did she ever take action against
18 Anna Stroud?

19 A: Anna submitted like a sexual harassment
20 complaint, and she did take action against Anna
21 by -- it's like she accused Anna of making up
22 the complaint or taking sides with the person
23 that Anna complained about. And I think when
24 someone comes and they say that they've been
25 sexually harassed, that we have to have the



1 empathy, and we also have to stay neutral and
2 not necessarily be on the victim, the person
3 that's making the accusation.

4 **HEARING OFFICER:** So Ms. Stroud did not make a
5 sexual harassment claim against Dr. Slayman.
6 It was against somebody else?

7 A: No. Against a outside contractor.

8 **HEARING OFFICER:** Oh, okay.

9 A: Yes.

10 **HEARING OFFICER:** I see. I see.

11 A: Yes. But Anna, in return, got a letter in her
12 file for making that complaint.

13 **HEARING OFFICER:** You were there throughout this
14 period of time?

15 A: Yes.

16 **HEARING OFFICER:** And you seem to have weathered
17 that well. How did you manage to handle this
18 as well as you did? Was it because you were
19 across the building?

20 A: Yes, ma'am. And honestly though prayer. I had
21 people praying for me, and we'd have a group of
22 people who pray and cover me. And truthfully
23 that's just what I was grown up -- raised is
24 that God covers us, and we have people that
25 constantly pray and covers us and then surround



1 us so ...

2 **HEARING OFFICER:** And then my next question you may
3 not know, and feel free to tell me you do not
4 know. Do you, from your own personal
5 knowledge, know how Ms. Bagley was selected to
6 do this investigation?

7 A: From what I understand, the board had our
8 attorneys to bring in an independent person.

9 **HEARING OFFICER:** Okay.

10 A: Yes, ma'am.

11 **HEARING OFFICER:** Do you have any idea what
12 Ms. Bagley's qualifications were to do this
13 investigation?

14 A: I know that she was a previous superintendent
15 in a -- in Anderson.

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

17 A: I think in Anderson 5 and a previous educator.

18 **HEARING OFFICER:** And did she have any connection at
19 all to Chester?

20 A: Not that I'm aware of.

21 **HEARING OFFICER:** Okay. So would it be fair to say
22 then that she was an outsider? She was not
23 well known within Chester.

24 A: Yes, ma'am. Yes, ma'am. I would say that she
25 was, indeed, an outsider with no connections to



1 Chester.

2 **HEARING OFFICER:** So she wasn't privy to all the
3 political machinations that were going on in
4 the background here between the sheriff and the
5 county administrator and that kind of thing?

6 A: No, ma'am.

7 **HEARING OFFICER:** Okay. Do you, of your own
8 personal knowledge, know if she talked to
9 anyone other than the people who signed the
10 grievance?

11 A: No, ma'am. That's the only persons that I'm
12 aware of.

13 **HEARING OFFICER:** Okay. I don't think I have any
14 further questions.

15 **MR. WINBURN:** Just one -- maybe one follow-up.

16 **MS. WILLIAMS - REDIRECT EXAMINATION BY MR. WINBURN:**

17 Q: You've been in HR for almost 20 years; is that
18 right?

19 A: Yes, sir.

20 Q: So in a scenario like this where you got four
21 or five employees who have a grievance,
22 obviously, they signed one with their
23 supervisor, is it advisable for them to
24 confront the supervisor like an intervention,
25 like a coup like a mutiny or Option B, elevate



1 it to their supervisor and let the process
2 work, in your view?

3 A: It was the latter where do you actually take it
4 to the person's supervisor and allow them to
5 follow the processes as stated in policy.

6 **MR. WINBURN:** Okay. That's all I've.

7 **MS. POLVI:** I have a follow-up.

8 **MS. WILLIAMS - RECROSS-EXAMINATION BY MS. POLVI:**

9 Q: Ms. Williams let's put it in context in terms
10 of -- as Chief HR. You have several direct
11 reports, correct?

12 A: That is correct.

13 Q: How would you feel if every single one of your
14 direct reports got together, had meetings
15 talking negatively about you and then all file
16 a complaint against you on the same day
17 altogether. How would that make you feel?

18 A: I'm not certain since it hasn't occurred to me,
19 so I can't speak to the feeling that I haven't
20 experienced.

21 Q: Fair to say that that would be really
22 surprising if all of your direct reports got
23 together and filed a complaint on the same day?

24 A: I would like to say that I would probably be
25 disappointed that they didn't speak to me. But



1 I have an open-door policy, so I lead by
2 anybody can come in at any time in the course
3 of day to share any information with me. I
4 have constant communication with my team. So
5 that's extremely important to me is to make
6 sure I have, you know, a pulse on what's going
7 on. So I would definitely be disappointed
8 because I do have a really good relationship
9 with my team. I'm with them every day and in
10 the day-to-day operations.

11 Q: And I agree with you that an open-door policy
12 is the best practice. And did Dr. Slayman,
13 indeed, typically have an open door for her
14 employees that -- be it her direct reports or
15 even others to come to her?

16 A: Yes.

17 MS. POLVI: Those are all my questions.

18 **MS. WILLIAMS - EXAMINATION BY THE HEARING OFFICER:**

19 **HEARING OFFICER:** You just testified that
20 Dr. Slayman had an open door. Can you tell me
21 why employees would not honor that open door?

22 A: Because they didn't feel comfortable going in
23 to just share information or to share their
24 feelings or emotions because they felt like she
25 couldn't relate or she couldn't understand. So



1 that's a lot of times why they came to my
2 office 'cause they felt that I listen and I
3 could empathize and have empathy with their
4 concerns.

5 **HEARING OFFICER:** I have one other question for you.
6 You know, I can actually recall saying this to
7 my husband you know. I might have been mad
8 about something and say, you know, I don't
9 believe you did that. I could just strangle
10 you for doing that. I -- do you think that
11 Dr. Slayman was -- when she made these
12 comments, do you think that's how she was
13 saying them?

14 **A:** I think it was a level of frustration and
15 anger, so it was some seriousness into it as
16 well. And with her being the supervisor, you
17 know, it's one thing if somebody is saying, oh,
18 my god, you know, that person's getting on my
19 nerves. But when it's the supervisor that's
20 saying it that leads a whole system of, you
21 know, a number of employees, you know, we have
22 to look up to person. And when we say it, it's
23 our words and, you know, it's like toothpaste.
24 Once you squeeze it out, you can't put it back
25 in.



1 **HEARING OFFICER:** Yeah.

2 A: So it's out there then. And if it was one
3 time, that's one thing. But because it was
4 repetitive, over and over and over again, and
5 in a seasoned professional, we have to be --
6 you have to be mindful of what we say and how
7 we say it. It's because it can impact people
8 differently any day of the week, you know.
9 People take things differently.

10 **HEARING OFFICER:** Yeah, they do. Thank you.

11 **MS. POLVI:** And I have a quick -- I apologize. I
12 know it just -- but it triggered something.

13 **MS. WILLIAMS - RECROSS-EXAMINATION BY MS. POLVI:**

14 Q: With regard to -- you talked about repetitive,
15 but earlier in your testimony you said only on
16 one occasion did Dr. Slayman make such a
17 statement. And then after you told her that
18 you found it offensive, she apologized and that
19 never happened again; isn't that true?

20 A: To me. That to me.

21 Q: So if other people had simply said that that
22 was -- you know, in a joking context wasn't
23 appropriate, evidenced by what she did with
24 you, that would have stopped?

25 A: I can't speak for what she would have done for



1 other people or to other people. I can only
2 speak for what happened with me.

3 Q: Rights. But fair to say that, you know, I
4 think you -- August 20th, 2013, and then all
5 the way up 'til the end of Dr. Slayman's
6 employment September 30th, 2015 -- or excuse
7 me -- between August 20th, 2013, and
8 September 30th, 2015, Dr. Slayman never made
9 such a repetitive-type statement to you? It
10 was just only on the one occasion?

11 A: Because it was a threat and it was a threat
12 that I actually could have went to the police
13 department and filed a threat, the level of
14 threat with the number of witnesses -- and this
15 is what I shared with her -- that there are
16 witnesses to the threat that you made. So, no,
17 she did not make that comment again because it
18 was something that, truthfully, if a threat has
19 been made, by law in state department laws for
20 a superintendent to even keep their licensure,
21 we have to file a report. So that's my duty as
22 the HR person. So I technically could have
23 filed a report that said that she threatened me
24 and there were witnesses to the threat.

25 Q: But the fact of the matter is you didn't



1 because you didn't think that she was gonna go
2 through with it. But it was a colloquial type
3 of statement that once you addressed a concern
4 to her, she apologized, one-time thing, never
5 happened again?

6 A: Well, I'm gonna be honest and tell you why I
7 didn't. Because I have a number of years to
8 work, and I want to work until I hit 28 years
9 with the state retirement system.
10 Professionally, it would not have been the
11 smart thing for me to do to publicly go ahead
12 and file a police report against my
13 superintendent because professionally that can
14 impact your career.
15 So it was a -- it wasn't that I shouldn't have
16 done it. It was a professional decision that
17 I made, that long-term I needed to work and
18 finish out 28 years. And it's hard for people
19 to understand why would someone in my level go
20 and file a complaint against my superintendent.
21 Police reports are public information, so
22 that's something that's public information and
23 professionally, you know, I'd -- you know, I
24 want to retire in 28 years. So I didn't want
25 to stunt my professional ability and



1 opportunities.

2 Q: And that's an understandable concern. And to
3 the core fact of the matter is your grievance
4 became public. It's been well publicized in
5 the news.

6 A: Indeed, it has.

7 Q: And that hasn't prevented you from getting a
8 job, has it? Dr. Slayman's not done anything
9 to harm your employment. She actually
10 recommended you for the capabilities that you
11 had in performing your jobs, and you, indeed,
12 have had another job in Orangeburg and another
13 job in Richland; isn't that true?

14 A: That is correct. But if memory serves me
15 correct -- and, you know, again, I haven't
16 looked at the -- what was out in public
17 information. I don't -- I can't recall that my
18 name was singled out but. As you well know
19 that the victims -- if you file a incident
20 report, your name, as the person that's filing,
21 is made public, and that is public information.

22 **HEARING OFFICER:** Okay. I don't have any further
23 questions. Do you have any ---

24 **MR. WINBURN:** None from me.

25 **HEARING OFFICER:** Nothing else?



1 MS. POLVI: All set. Thanks.

2 (Off the record.)

3 (Witness excused.)

4 HEARING OFFICER: All right. Would you let the
5 court reporter swear you in, please, ma'am.

6 BROOKE CLINTON, having been duly sworn, testifies as
7 follows:

8 MS. CLINTON - DIRECT EXAMINATION BY MR. WINBURN:

9 Q: Ms. Clinton, will you please state your full
10 name for the record?

11 A: Brooke Wilson Clinton.

12 Q: And where do you work?

13 A: Currently with the Chester County Chamber of
14 Commerce.

15 Q: How long have you been there?

16 A: Two years.

17 Q: Where were you before that?

18 A: Chester County School District.

19 Q: What did you do for the Chester County School
20 District.

21 A: I was the public information officer.

22 Q: I think on your desk is a document. It is a
23 grievance filed September 8th, 2015; is that
24 right?

25 A: Uh-huh.



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1 Q: So is that a "yes"?

2 A: It is.

3 Q: The court reporter's taking down everything
4 that you say, so sometimes saw that. Did you
5 sign that document?

6 A: I did.

7 Q: And in general, for the benefit for the hearing
8 officer, can you just generally describe why
9 you filed a grievance along with your
10 coworkers?

11 A: Well, this particular document was signed in
12 part because we were told that Dr. Slayman
13 would be possibly put back into her position,
14 and that was very upsetting because we didn't
15 feel like it was not an environment that we
16 could work in, especially me in public
17 relations. We very much have to be a team and
18 support everyone. So that was why we signed it
19 that particular date.

20 Q: And how did you -- can you describe any --
21 what -- can you describe what made it a hostile
22 work environment?

23 A: Well, for me it was the -- it was incredibly
24 difficult to work in a situation with a
25 supervisor who -- gosh, I'm not sure how to



1 word it -- who you never knew which person she
2 was going to be. I really -- there were days
3 it was really very positive, very good ideas,
4 great things happening. And the next day, it
5 was very unpredictable, and that's incredibly
6 stressful. And that was at the beginning of my
7 working there.

8 And then as thing progressed, I began to see
9 things happening that I just didn't agree with
10 ethically, and I consider that a difficult
11 situation when your values are in conflict with
12 your assignment.

13 Q: You said there'd be good days and bad days?

14 A: Uh-huh.

15 Q: What would make them bad days?

16 A: Bad days would be when the superintendent would
17 be angry, upset, when she would tell us one
18 thing in the morning, one thing in the
19 afternoon. When we would have a crisis that
20 maybe was a crisis, wasn't a crisis. It was
21 all truly dependent more upon her mood than
22 maybe the realty of the situation.

23 Q: And where was your office in connect -- well,
24 in relation to Dr. Slayman's office, Dr. King's
25 office, and Jeff Gardner's office?



1 A: So my office was actually connected to the back
2 of Dr. Slayman, so her back door was beside my
3 door.

4 Q: So were -- is it safe to say you were within
5 earshot of a lot of the conversations ---

6 A: Yes, sir.

7 Q: --- at the time?

8 A: Uh-huh.

9 Q: You mentioned unethical. What do you mean by
10 that, unethical?

11 A: Well, for me, I felt like some of her decisions
12 were based on emotion and not rational
13 behavior, so she was doing things that I was
14 very concerned with putting students in danger.
15 So I guess when I say unethical, not -- I'm not
16 implying she was like stealing money or
17 doing -- not that kind of unethical.

18 Q: Right.

19 A: The unethical in I didn't feel like the mission
20 of the district, the keeping your students
21 safe -- and I could give an example if you want
22 that but ---

23 Q: Yes. Please do.

24 A: So we were in a meeting one day, and she
25 disliked our sheriff and, in my opinion, had



1 some reason for why she should dislike him.
2 But I felt like it had escalated. And so we
3 had live cameras in our schools. And I
4 remember making the suggestion that we needed
5 to give our school resource officers access to
6 that footage because I'm thinking, as a parent,
7 if you can give them live feed -- this was not
8 recordable, so they couldn't have taken it back
9 and shown it to their friends or -- then maybe
10 you could save a life 'cause you could zero in
11 on an active shooter more quickly. And her
12 comment was, I would never give him, meaning
13 the sheriff, anything.

14 And that was one of the most poignant moments
15 for me was realizing that her decisions were
16 based on her dislike of an individual and not
17 focused on the safety of our children.

18 Q: When she made that comment, was she looking at
19 you when she made it? Or was it at a meeting?

20 A: We were in a cabinet meeting, senior cabinet.

21 Q: And was it in response to your suggestion ---

22 A: Yes, sir.

23 Q: --- that you open up the footage and allow the
24 sheriff to have access?

25 A: It can be seen on a tablet, so my suggestion



1 was we give the -- at the school officer a
2 tablet with a live feed on it.

3 Q: Okay. So school officer, or what's commonly
4 called an SRO, would have a tablet, and on that
5 tablet would be live monitoring, like ---

6 A: The different camera angles ---

7 Q: --- footage of the different cameras?

8 A: --- of the whole school.

9 Q: So you could see the whole thing all at once?

10 A: Uh-huh.

11 Q: He or she?

12 A: Uh-huh.

13 Q: Okay. And why would that be -- if that -- if
14 they had -- if she agreed with your suggestion,
15 why would have that have been giving access to
16 the sheriff?

17 A: I don't know. I guess they were his employees
18 at the time. This was still the school
19 resource officers ---

20 Q: Okay.

21 A: --- not the school safety officer.

22 Q: So this is pre-Defender?

23 A: Uh-huh.

24 Q: Sorry.

25 A: I don't know. Maybe she was worried they would



1 have somehow used the footage against her or --
2 I don't know what her reasoning. I didn't ask
3 her, to be fair.

4 Q: Sure.

5 A: But as a parent, I was very scared, and I just
6 realized we had gotten to a place where that
7 was more important to be in conflict with him
8 and to maybe really think through what would be
9 in the best interest of a student in an active
10 shooting situation.

11 Q: So as the public information officer, were you
12 essentially the spokesperson for the district?

13 A: I did, but I would usually try to run it past
14 the superintendent to make sure she was okay
15 with something, and she was always very good to
16 help me with that, make sure I was -- had
17 worded it correctly. If I need to get
18 something from the lawyer, the attorney, she
19 would do that for me. I never directly
20 contacted them. But I always had support if I
21 needed it, in other words.

22 Q: Was there ever an occasion where she asked you
23 to say something to the public that you
24 disagreed with or that you thought was
25 inaccurate?



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1 A: In August of -- gosh, I forgot the date now.
2 I would have to recollect. It was August, I
3 guess, of 2016. So right before she was put on
4 leave; is that right? Anyway, it was within
5 weeks of her being put on leave. She asked me
6 to put together some sort of public media event
7 to introduce the school safety officers. These
8 would be the new Defender Services.
9 And so I organized a luncheon with our
10 principals and our media, and we invited any
11 first responders in the area that wanted to
12 come. Of course, the sheriff's office didn't
13 come. But we did have some first responders
14 come. We had all of our principals. It was at
15 Louisville High School.
16 And so the Defender Services officers were
17 there. They introduced themselves. Of course,
18 this was all part of the plan. My PR plan was
19 if maybe we tell parents who these officers
20 are, they'll feel better that they're not
21 technically SROs. And so these folks stood up.
22 They said their name, their background. Some
23 of them have been military. And I will admit,
24 I was standing there thinking some of these
25 folks don't exactly look physically qualified.



1 They just didn't look they were fit, ready for
2 the job.

3 So anyway, when it was over, of course, the
4 media's ready to take their group picture, get
5 their names. And then I was told by the
6 superintendent we can't release those names.
7 And I was like, well that's the purpose of
8 being here. And she said something to the
9 effect of, we're scared the sheriff will go
10 after them personally. We're not gonna release
11 that. Just don't do it.

12 So I had to go back to the media at this media
13 event and say any notes you just took, hold
14 them. I can't really tell you why, but don't
15 do that. And then that afternoon she came in
16 my office very casually, and she said, well,
17 those aren't the real people that we're gonna
18 use. We just used them as a fill-in for this
19 event. And I was mortified because I had
20 never, never been told that. Would never have
21 purposefully lied to my media contacts.

22 Q: And were there parents there?

23 A: If they were parents, they were parents like me
24 that just happened to be there as work. But I
25 don't remember there been parent reps invited.



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1 Q: The community that would have been teachers,
2 principals ---

3 A: Don't remember teachers being there.

4 Q: Are first responders?

5 A: Principals were there. We invited first
6 responders. I don't think anyone from the
7 sheriff's would have come, for obvious reasons
8 but so ---

9 Q: Do you remember how you framed the invitation?
10 In other words, did you label it something,
11 meet the SROs, or anything like that?

12 A: I would have to pull it back up to see. And I
13 guess I don't even have access. It on e-mail.
14 But to my knowledge, it was publicized as get
15 to know the SSOs. That's what I told the media
16 contact, you know.

17 Q: Right.

18 A: And I had even discussed with him, I think this
19 will make you feel better if you get to meet
20 the real people and understand why we're going
21 with them, that these are people with military
22 backgrounds and -- but anyway, when the people
23 that were introduced were introduced, they were
24 employees of Defender Services, but they were
25 not the people that we got.



1 Q: Is it fair to say they were stand-ins?

2 A: They were stand-ins.

3 Q: And so at the time when -- in general, a big
4 picture, the move from SROs through the county
5 or the sheriff or whoever -- whomever was
6 supplying them to Defender, was that a
7 controversial issue among community members, or
8 how would you describe it?

9 A: It was. It was very difficult. As I mentioned
10 earlier, I have always felt like there was
11 reason for the district to have issue with the
12 sheriff department. I really do feel way.
13 There were some things that were done and said
14 that I don't think were very good. But it
15 escalated. And instead of coming to the table
16 and saying we need to talk this out, because at
17 the end of the day, the children are what we
18 have to focus on. These are our students. To
19 my knowledge, that was not done. So what
20 happened is ---

21 Q: What was not done? I'm Sorry.

22 A: The -- it escalated, and the communication
23 ceased. So the sheriff was cut out of
24 decisions on SROs. Senior staff was cut out.
25 Principals were cut out. So the next thing we



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1 know, I've got -- we're in the Charlotte
2 television area -- I've got Charlotte
3 television stations beating down my door
4 because the sheriff has released press releases
5 to them saying you've just kicked out our SROs.
6 Are you crazy? We're in the 21st Century. Why
7 have you done this?

8 And I had no way to respond because I couldn't
9 say, well, we met with you because he's over
10 there saying I wanted a meeting with me. So it
11 was a disaster for PR for me incredibility
12 stressful. I had one reporter that told me she
13 was gonna follow me to my house. I mean, it
14 was that aggressive where they just felt like
15 how could this possibly be in the best interest
16 of your students? Parents were blowing up
17 Facebook. Are you insane? Why would you do
18 this?

19 Q: Okay.

20 A: And, you know, the sad part is, even if we had
21 good reasons because we didn't meet, the
22 communication broke down, we couldn't even
23 release those reasons.

24 Q: You were never aware of any reason why the
25 sheriff was cut out of these discussions?



1 A: Not at that point. Now, initially I know what
2 fractured -- you know, what caused the
3 fracture.

4 Q: Okay. Can you share that?

5 A: I can. The -- to my knowledge, the sheriff
6 came to the superintendent. He offered to put
7 in undercover officers in our schools and look
8 for weaknesses. She agreed to that. He did
9 that. He came back and gave a report of some
10 kind. But in the meantime, he released the
11 weaknesses to the press.

12 So all of a sudden, we find out you've just
13 told everybody if you want to get into this
14 high school, you just ask to use the bathroom.
15 She was very upset, and I think she had a right
16 to be. That was -- it put our kids in
17 jeopardy.

18 So she asked to meet with him, and he sent an
19 officer instead of himself. So that's what
20 started it. But I was told at a point that
21 they had made amends, but I don't -- I never
22 saw that happen. It just got worse.

23 Q: Ever an occasion where she berated you
24 privately, publically, in front of colleagues?

25 A: The thing is it was -- we had an unusual



1 relationship because I was her PR person. My
2 job was to promote the district. And in doing
3 that, I had to promote her. So I had a little
4 different role than maybe some other people.
5 One of the things she was good at -- and I
6 don't mean that at a compliment -- she could
7 hold you on a hook and scare you. So, for
8 example, I remember one time I get an e-mail
9 from her, and it said something to the effect
10 of I'm really upset with you. See me. Okay.
11 Well, then I couldn't get access to her. She
12 was in meetings where -- we knew this. So I
13 had to wait all -- a very conscientious person.
14 I worried. I worried. What have I done? What
15 have I done? What have I done?
16 I go in the next day, meet with her privately.
17 She went up one end and down the other. Not
18 screaming, not cussing, not -- nothing like
19 that. But just, you know, I expect you to have
20 your work, you know, right. And I don't want
21 anything -- and I finally -- I said, what did
22 I do wrong? And she said you misspelled a
23 word. And I said, what word did I misspell?
24 And she told me, and I said I didn't misspell
25 that. There's two ways to spell it, an English



1 version and an American version.

2 And she said, oh, okay. Well, just know in the
3 future, make sure you don't misspell anything.
4 Bye. So it was that kind of -- and then she
5 was fine. She was nice to me the rest of the
6 day. It was no problem. But she had caused
7 me ---

8 Q: I'm sorry. Yes?

9 A: She had caused me angst, turmoil, whatever you
10 want to call it just because she knows I'm a
11 natural worrier and I wanted to do it right.
12 And that was very early on in my time with her.
13 So anyway -- and there were other times, you
14 know, we'd be somewhere and she might say -- I
15 remember one name in particular she made the
16 comment -- you know, this was during the
17 sheriff's debacle -- you know how awful our PR
18 is. And I felt like saying, well, I can't
19 control our PR if I don't have positive things
20 to say when you're making decisions that are
21 counteracting the sheriff who's a PR master and
22 he knows to go to the media and he knows to
23 tell parents your kids aren't safe. How do you
24 combat that? There's nothing I can say. I'm
25 in a no-win situation. So those kind of things



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1 happened but ...

2 Q: Did you witness her making any threats to any
3 other -- to you or to the others?

4 A: She -- it's in my whole entire career is
5 probably the most -- one of the most stressful
6 moments of my career and that is we had a staff
7 meeting, and it was following a board meeting.
8 And in that board meeting, our HR director,
9 Shawn Williams, had thanked the board for
10 coming to an HR event. It was very casual.
11 You know, thank you for coming. I mean, it
12 wasn't anything over the board -- over the top.
13 So anyway, during our cabinet meeting that
14 followed that board meeting, Dr. Slayman was
15 very agitated. And, again, sometimes she was
16 happy in the board -- in our cabinet meetings.
17 This day she was highly agitated. She got more
18 and more angry. And I will never forget it.
19 She told Shawn she should not have spoken to
20 the board, she looked at her, and in a very
21 deliberate voice, she said, I will slit your
22 throat if you ever do that again. I remember
23 leaving that meeting. I was trying to type,
24 and I could not type. My hands were shaking so
25 hard. I've never gotten over it.



- 1 Q: Did it -- did you share your thoughts with
2 anyone at that time?
- 3 A: I checked on Shawn. I was very worried about
4 her. She had gone back and talked with, I
5 believe her director of benefits, benefits
6 coordinator. So she kind of had a plan. So,
7 to my knowledge, she went and -- went back to
8 Dr. Slayman and basically told her if you were
9 any other employee, you could get fired. You
10 could get arrested. You cannot talk to someone
11 like this.
- 12 Q: After that point after that statement, did you
13 witness her making threats of others or talking
14 about others in a threatening way?
- 15 A: She used a lot of threatening language. And
16 I -- and she would use it in different ways.
17 Sometimes she would use it casually like you
18 might say, now, if you tell somebody, I'm gon'
19 kill you. Just like you would joke at a party.
20 That was not uncommon. But she would also be
21 very agitated. Her face would be red or
22 flushed, whichever. And she would say, I'll
23 crucify him, which for me, that's a little on
24 the religious side, so it always bothered me.
25 So when she would say I would crucify him, that



1 bothered me. And she would be talking about an
2 individual that she was mas at. I mean, so it
3 was -- she used that kind of language quite a
4 lot.

5 Q: And the crucify comment that you're referring
6 to came after the Shawn Williams ---

7 A: No. This was just part of her vernacular.

8 Q: Well, I'm sorry. So the Shawn Williams
9 incident that you just described occurred.
10 Then they, let's say the example you mentioned
11 about I will crucify that person, did that
12 happen after or before?

13 A: I don't remember. She just used it a lot. So
14 it was just part ---

15 Q: Okay.

16 A: It would just be like me saying common phrases
17 in my vocabulary. It was a common phrase in
18 her vocabulary. She would use them in
19 different ways. The incident with Shawn was
20 the one time I ever felt the most upset,
21 threatened, horrified to the point that I
22 called and said are you okay.

23 Q: And I guess I'll ask it one other way.

24 A: I'm sorry. I don't -- I'm sorry.

25 Q: No. That's okay.



1 A: I just ---

2 Q: Based on the time frame -- and you may not
3 know -- do you know whether Dr. Slayman ceased
4 making threats or using threatening language
5 after the threat to Shawn Williams?

6 A: Oh, gosh, no. She used it throughout our
7 entire relationship.

8 Q: Okay.

9 A: Yeah. And she would say things to me like, you
10 know, take this to your grave or I'll, you
11 know, kill you if you say it, but I never --
12 she never threatened me the way she threatened
13 Shawn. Never like that.

14 Q: And in your -- how long were you involved --
15 were you in the school district, an employee of
16 the school district?

17 A: It's kind of a weird story. I worked for the
18 Olde English Consortium, and it was based at
19 the school district. So I actually started
20 there -- I really can't remember, but I was
21 there, I guess, it was two thousand maybe four.
22 So even though I was in the school district, I
23 was paid by the school district, worked for the
24 Olde English Consortium.

25 Q: You were in the school realm?



1 A: Yeah. And I was in -- I had a office there,
2 but I wasn't -- I didn't directly report to the
3 superintendent. I just, at that time, did a
4 little bit of PR consulting for Dr. Campbell,
5 the superintendent at that time. But I only
6 worked for Dr. Slayman for about three years.

7 Q: Have you ever seen any other supervisor that
8 you've had over the years make any kind of
9 threats like Dr. Slayman has made?

10 A: I have not.

11 Q: Before or since working with Dr. Slayman?

12 A: I have not. Not to that -- not like that, no.

13 Q: Okay.

14 A: I've heard other supervisors use curse words
15 and foul languages but never ever what I saw
16 that day with Ms. Williams.

17 Q: And would you describe in general terms -- what
18 you say is the up and down as kind of mood
19 swings?

20 A: I don't know. I think it was more like --
21 she's just a very good manipulator, so she
22 could use her mood to manipulate you into
23 feeling a certain way, good or bad, to get you
24 to do what you needed to do.

25 Q: The e-mail you described earlier about -- I



1 don't know what you testified to but
2 essentially I'm -- the e-mail ---

3 A: Uh-huh.

4 Q: --- meant I need to talk to you? And then you
5 wait -- it was a day. You had to wait. Is
6 there any doubt in your mind that that was
7 intentional, making you wait?

8 A: I think so. And it was just -- you know, I was
9 thinking -- I was driving down the road this
10 morning, and I remembered one day that it
11 really hurt me. I remember I got a phone call
12 at lunch that -- my mother was at the doctor's
13 office in Chester. And she called and she
14 said, they're -- they think I've had a heart
15 attack and I may be on the brink of having one.
16 I called Dr. Slayman. I said I need to go with
17 my mom. I can't find my dad. And she said
18 okay. No problem. Go.
19 So she knew I was following the ambulance to --
20 was it Providence? -- whatever the heart
21 hospital is in Columbia. Going down 77
22 worrying. And then all of a sudden the phone
23 rings and it's her. And she's saying I need to
24 you call so-and-so and so-and-so 'cause I'm to
25 busy. And you know I'm in a car following my



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1 mother's ambulance and that's what you do.
2 So it was an emotional -- and, of course, I
3 went yes, ma'am. And I just kept driving. You
4 know, so it was that kind of -- you know, and
5 when we adopted my daughter, she just quit
6 speaking to me. And she came out -- I remember
7 I was standing beside my -- one of our office
8 administrators, and she asked the office
9 administrator to come proof a speech. And the
10 office administrator just looked at me. What
11 do I do? And I said I'll walk in there. And
12 I walked in, and I said, why would you do that?
13 And she said, because you're on FMLA. I said,
14 but I'm in the building working. FMLA says I
15 can come and go.
16 But I felt like I was being punished because I
17 had adopted a child and I was out. And it
18 wasn't that she hated my child, I don't think.
19 It was because I was out. And that was, you
20 know -- we want you to be there. And so it was
21 just that kind of emotional -- and the
22 embarrassing thing is, you know, that happens
23 and everybody in the office sees it. And
24 they're just like (demonstrating).
25 And it's just hard and it's hurtful. And, like



1 I said, I was in a role where I had to try to
2 support her and it just hurt.

3 Q: Do you -- you mentioned FMLA. Did you have any
4 interaction with Dr. Slayman regarding FM --
5 Anna Stroud's FMLA?

6 A: The only thing I can tell you is, again, I
7 think this goes back to the manipulation. And
8 I just remember one time she told me that Anna
9 did not have it. That -- and I truly don't
10 remember the whole conversation. She just said
11 she didn't have it. And I was shocked. And I
12 was like, what? She told me she did. Well,
13 she didn't.

14 And then after all this happened, I found out
15 Anna most definitely did have FMLA. So it just
16 hurt that, again, why would you tell me
17 something? Was it to try to break that
18 friendship or to coworkership or whatever with
19 her? I never -- I don't know.

20 Q: Do you remember -- the FMLA issue with Anna
21 Stroud, do you remember a time frame that that
22 occurred?

23 A: I truly don't. It was not too long before this
24 whole thing happened, but I don't -- I couldn't
25 tell you for sure when it was.



1 Q: About a year maybe? You don't know?

2 A: I just couldn't swear to that.

3 Q: Fair.

4 A: I'm sorry.

5 Q: Any other occasions that you could think of
6 where you felt belittled by Dr. Slayman in an
7 inappropriate way?

8 A: You know, it was so strange because honestly
9 she would come into my office in the morning
10 and she might say, you know, I think I might
11 hire Alice -- whatever her name was a
12 Louisville -- to maybe do PR this summer. I
13 just might hire her. I just like, well, go for
14 it. She'd come back the afternoon and she's
15 like, you know I was kidding. Okay.

16 So it was more of that kind of thing. You
17 know, but in the flip side, there were times
18 when she sent me really nice notes and told me
19 nice things and gave me encouragement and gave
20 me good ideas. So it was this (demonstrating).

21 Q: Just for the record, you made a roller coaster
22 motion with your hand?

23 A: Roller coaster, yeah.

24 Q: Okay. Right. Your decision to sign the
25 grievance along with the other coworkers, do



1 you regret that decision? Do you stand by the
2 decision? How do you feel about it now?

3 A: I don't regret it. One of the things that was
4 really hard for me, I did not know the depth of
5 what was happening to some of the other senior
6 staff members, as in the associate
7 superintendent.

8 Q: Can I -- and what do you mean by that? What do
9 you mean depth?

10 A: I didn't know how physically sick some of them
11 were. I did not know -- let me back up.
12 I didn't know how she had done some things
13 behind the scenes until all this began to
14 happen. When we found out after Ms. Bagley's
15 investigation is when we really began to say,
16 well, I was told this. What? Well, I was told
17 this. Like with FMLA paperwork, what? Why
18 would she tell me that?
19 And it was very hurtful, very shocking for me.
20 I began to realize she had sort of pegged us
21 and figured out what were our weaknesses, what
22 were our strengths. She knew my weaknesses
23 were my children. I'm loyal. I'm
24 conscientious. I worry. And that's a weakness
25 very easily.



1 Q: I have that same weakness.

2 A: And so when we had gotten to this point of the
3 grievance, the thought of her coming back, I
4 knew I would have to leave. I didn't want to
5 leave my job. I knew I could never work for
6 her again because I couldn't trust her. And I
7 can't do PR for somebody I can't trust. I just
8 cant.

9 So that is why I signed this. It was not --
10 you know, when -- if this date had been a month
11 prior, I don't know that I would have signed it
12 because didn't know everything I knew in the
13 month between when she was put on leave and
14 when this happened.

15 Q: Okay.

16 **MR. WINBURN:** I think that's all I have.

17 **MS. CLINTON - CROSS-EXAMINATION BY MS. POLVI:**

18 Q: So I'll pick right back up. So based on your
19 testimony that you just gave Ms. Clinton, you
20 essentially just -- and I'm paraphrasing my
21 conclusion from your testimony, but essentially
22 said that you would not have filed that hostile
23 work environment but for what other people were
24 telling you; is that accurate?

25 A: No. I filed this understanding that she was



1 coming back. That was what Mr.-- our lawyer
2 told us, Mr. Nichols, that it was understood
3 that she was probably gonna be brought back.
4 So if I misunderstood that, so be it. It was
5 not that I was denying I had a hostile work
6 environment. It was just that I really truly,
7 at that point, the thought that she would come
8 back, I couldn't work for her.

9 Q: Well, let's put this picture together of what
10 you described as a roller-coaster hostile work
11 environment.

12 A: Uh-huh.

13 Q: Do you deny sending Dr. Slayman a birthday card
14 just prior in July 2015?

15 A: I don't. No.

16 Q: Did you share pictures of your kids with
17 Dr. Slayman, including your newly adopted baby
18 daughter?

19 A: I did.

20 Q: So you felt close enough with her to share
21 those personal things?

22 A: I did.

23 Q: And didn't just before, again, you filed a
24 complaint didn't Agnes, Dr. Slayman, and her
25 husband Rob make superhero masks for your



1 children?

2 A: I think she told me she was going to. I don't
3 remember getting them. But I'm not -- I
4 don't -- I really don't remember. We talked
5 about it. I definitely remember that. But I
6 don't remember them getting them. Maybe they
7 did. I don't ---

8 Q: Would you contest that you sent an e-mail of
9 your children with the mask in pictures to
10 Dr. Slayman?

11 A: I truly just don't remember.

12 Q: And is that the type of person who'd be giving
13 you a hostile work environment when she's
14 taking time out of her own personal time to
15 make masks for your kids?

16 A: I really -- I'd like to see that e-mail, if you
17 don't mind sharing it.

18 Q: It's not already in the record, so I can't.
19 But I mean, are -- you are aware of her ---

20 A: I don't remember that.

21 Q: --- making masks for your children?

22 A: I don't remember that, so I'd like to see it if
23 it exists 'cause I don't remember it. But
24 we -- I remember her saying something to the
25 effect 'cause I didn't know she was artistic.



1 And I was like, well, that's cool. So I
2 remember that part of the conversation. I just
3 don't remember getting it.

4 But, no, she -- the week that this happened,
5 she saw my kids. I mean, it's -- that's what
6 I'm telling you is a roller coaster. That's
7 why it was so hard. That's why I probably have
8 taken it harder than anybody.

9 Q: In context of you filing a grievance, didn't
10 you realize that this was gonna ruin
11 Dr. Slayman's career?

12 **MR. WINBURN:** Objection.

13 A: (Witness nods head.)

14 Q: And that's the same person who just made masks
15 for your children?

16 **HEARING OFFICER:** Rephrase your question, please.

17 **MS. POLVI:** Happy to.

18 Q: Let's talk about -- it's a sad time in your
19 personal life. I'm sorry to have to bring it
20 up. But do you recall that your home burned
21 down?

22 A: Well, it caught on fire. It didn't burn.

23 Q: Caught on fire?

24 A: Uh-huh.

25 Q: And that was around the time you started with



1 the district, was it not, 2014?

2 A: Uh-huh.

3 Q: And you didn't have any accrued leave time, as
4 a new employee, did you?

5 A: Well, they actually changed the rules somewhere
6 around that time. They changed it from where
7 you got it at the beginning to -- but I'd have
8 to go back in my personnel file, 'cause I had
9 been with the district, so I really don't
10 remember.

11 Q: But as a new employee, you didn't have leave
12 time, and Dr. Slayman gave you the time you
13 needed to take care of that personal emergency,
14 didn't she?

15 A: I think we'd have to double-check those
16 records, because really had been working there.
17 But she was kind to me during that time. I
18 will definitely agree to that, as far as -- but
19 I wasn't out a tremendous amount.

20 Q: And Dr. Slayman let you come and go if your
21 family was sick, did she not?

22 A: Well, I would take sick time; yes.

23 Q: She let you work from home when your children
24 were sick?

25 A: I had sick time; yes.



1 Q: And you used, actually, doing work from home,
2 not using your sick time at Dr. Slayman's
3 allowance; was that not true?

4 A: I wouldn't really agree with that other than --
5 unless you want to say when she would call me
6 at 6:00 or 7:00 o'clock at night, I'd be
7 working then wouldn't count that as paid time
8 so ...

9 Q: And during those same times, Dr. Slayman
10 encouraged you when you needed to spend time
11 with your children, during school days, you
12 were allowed to leave to do that, weren't you?

13 A: Like to go to an assembly; yes.

14 Q: There's a time frame that you were suffering
15 from some vertigo, right?

16 A: Uh-huh. Around that same time the house
17 burned; yes.

18 Q: And Dr. Slayman allowed you to take time off as
19 needed, didn't she?

20 A: Uh-huh.

21 Q: Sorry. For the record ...

22 A: Yes. But I do think I had some time there. So
23 I'd -- I think you'd have to check to check my
24 personnel record.

25 Q: And there weren't any times that Dr. Slayman



1 said you couldn't take care of those personal
2 needs?

3 A: No, huh-uh.

4 Q: So let's talk about how you described that you
5 were upset by these circumstances. Do you
6 recall going to Dr. Slayman's office on
7 September 7th, 2015?

8 A: I don't. You'd have to tell me what that was.

9 Q: Did you go into Dr. Slayman's office saying
10 that you were praying for her, worried about
11 her best exam?

12 A: On what date again?

13 Q: September 7th, 2015.

14 A: If I did, I did. I had taken her to the doctor
15 the week that she got put on leave and took her
16 after hours. She was worried about it. Yes,
17 I was worried about it. So if I did, I did.
18 I just don't remember. But I definitely agree.
19 I had taken her.

20 Q: And after this grievance was filed, including
21 by you, didn't you go to Dr. Slayman's office
22 and tell her they've said really -- some bad
23 things about you?

24 A: I do not remember saying that to her. No,
25 ma'am.



1 Q: And did you go to Dr. Slayman's office and tell
2 her, I know they're not true?

3 A: I did not tell her that; no.

4 Q: And did you go to Dr. Slayman and say that
5 everybody else was blaming her for things that
6 you were concerned about?

7 A: I did not tell her that. No, ma'am.

8 Q: And did Dr. Slayman tell you that she couldn't
9 discuss that with you?

10 A: She -- I have some vague recollection about the
11 breast cancer. But I don't even know if she
12 had it. It was something with a test she had
13 to take to her doctor like -- but that's the
14 only thing I remember that we discussed.

15 Q: Do you recall driving Dr. Slayman to the CMC
16 Hospital up in Charlotte?

17 A: That's what I'm talking about. She had a disk
18 that she had to take, and she was worried about
19 drifting. And I did volunteer to take her. I
20 was worried about her getting it there. She
21 was upset, and she doesn't like to drive in
22 traffic she's not used to. Yes.

23 Q: And that was a kind gesture on your part.

24 A: Thank you. And I had to have my kids with me.
25 And we all went. It was after hours.



1 Q: Are you aware of other people describing it in
2 this grievance as somehow Dr. Slayman forcing
3 you to drive her places?

4 A: They're probably referring to my taking her to
5 a job interview. And that was a completely
6 separate situation. She didn't force me, but
7 she did ask me to take her. I was on the
8 clock, but her exact words were, you work so
9 many extra hours. I don't think it's a big
10 deal if you take me. She had taken cough syrup
11 or some kind of medicine. She didn't feel
12 comfortable driving. She said, if you do this,
13 will you give me your word you won't tell
14 anyone. And she can tell you, I didn't even
15 tell my mama. And that's somebody I tell
16 everybody [sic] to. But that was like years
17 before.

18 So I took her. I didn't report it. I did not
19 report it to Ms. Bagley. Someone else must
20 have. But I gave her my word I didn't tell
21 anyone, and I didn't. Now, this with her
22 breast cancer was a private health issue. I
23 didn't tell that either. So I wasn't doing
24 these things to tell them. I genuinely was
25 worried about her.



1 Q: Well, how else would other people have known
2 about it but for you telling them?
3 A: I did not tell them. She could have told them.
4 Someone else could have told. I did not tell
5 them.
6 Q: And with regard to the interview -- and I think
7 your testimony is clear -- but with regard to
8 the reason why she asked you is that she felt
9 it wouldn't be safe for her to drive ---
10 A: That's correct.
11 Q: --- because she had cold medicine?
12 A: Yeah.
13 Q: And then the occasion that you drive her to
14 Charlotte ---
15 A: Uh-huh.
16 Q: --- related to the picking up the CD for the
17 breast screening.
18 A: Yeah. Something like that, yeah.
19 Q: Accurate to say that showed her appreciation
20 by, you know, offering to pay for gas?
21 A: I don't remember that, she actually -- it was
22 so strange. She wanted to buy my children ice
23 cream sundaes. And I remember telling her no,
24 ma'am. They haven't had supper yet. And she
25 was insistent. And she said, no, I want to buy



1 them ice cream sundaes. And I said no, and she
2 said yes. And she said I've never had an ice
3 cream sundae because when you don't have kids,
4 you don't have these kind of perks or something
5 strange. So we ended up going in to
6 McDonald's, and she bought them ice cream
7 sundaes. So that was her thank you gift for me
8 taking her up there, so that's what happened.

9 Q: With regard to the investigation that occurred
10 sometime after the grievance ---

11 A: Uh-huh.

12 Q: --- there was a one-page document of an e-mail
13 that you sent to Joel Griggs -- and I could
14 just refresh your recollection it was on
15 January 8th, 2016 -- and in it you state, after
16 the investigation began, I learned just how
17 often I had been lied to or manipulated by
18 Dr. Slayman for own gain or purpose.

19 A: Uh-huh.

20 Q: Who told you that during an investigation that
21 some -- for some reason that she's lying and
22 manipulating you?

23 A: Oh, these were the other members of the senior
24 staff. As we would talk through, we just like,
25 what do you mean? Like I gave the example with



1 Anna Stroud. She said, I did have an FMLA
2 paperwork. But I was told she didn't. So it
3 was just -- it was those kind of things where
4 the dots began to connect, and it was just
5 really, really upsetting for me, especially
6 having done PR. Because I take great pride in
7 whatever I told the press or whatever I told on
8 behalf of the district it being accurate. So
9 it was really, really upsetting.

10 Q: And this is all after you had already initiated
11 the grievance and supposedly Betty Bagley is
12 the one investigating?

13 A: No. Ms. Bagley was before this.

14 Q: I guess, clarify for me, the time frame is that
15 you say after the investigation began, I
16 learned just how often I had been lied to or
17 manipulated by Dr. Slayman for her own ---

18 A: Uh-huh.

19 Q: --- gain or purpose. So ---

20 A: Once she got put on leave.

21 Q: Okay.

22 A: --- is when we began to share things. And, you
23 know, one thing that always impressed me with
24 this team is, as a PR person, on many levels
25 I'm the same -- I'm on the same level as



1 someone like Shawn Williams in HR. But she
2 would not come and tell me in a gossipy way,
3 oh, so-and-so got fired because of this. I
4 wouldn't know. She would only tell me if
5 someone lost their job if I -- if she thought
6 it was gonna hit the press or she thought it
7 was gonna hit social media.

8 So we did not gossip. We didn't sit around and
9 say, oh, this or that. But were there things
10 that happened over years that I would see one
11 of them and they'd be upset like the instance
12 with the slit your throat where we would say,
13 are you okay; what happened; why were you
14 upset? Yes. But did we ever sit down and just
15 start comparing notes, well, she told me this.
16 Well, she told -- no. But once all this
17 started happening with Ms. Bagley, yes. That's
18 when we found out. When I read the Bagley
19 report and I said, oh, my gosh. That had to be
20 so-and-so. Then I knew because we knew who
21 said what. So that's what happened. And all
22 that happened prior to my signing this. I
23 signed this because I could not work for her
24 again. The trust was gone.

25 Q: Well, I think the key in there is that you just



1 described that there's no talking; there's no
2 concerted effort. But how in the world do all
3 five of the senior staff all submit a grievance
4 at the same time without communicating with one
5 another?
6 A: Oh, we did communicate once the investigation
7 began. Absolutely. We also had an attorney.
8 Q: Before the investigation began, you would have
9 had to have been able to submit the grievance.
10 You all submitted the grievance at the same
11 time.
12 A: Yes. But it was after the Bagley report. When
13 was the Bagley report filed? Do you have that?
14 Q: There has to be a -- and that's -- again, it's
15 cross-examination ---
16 A: I'm sorry. I just wondered so you would know
17 because I really don't know when the Bagley
18 report was submitted. But ---
19 Q: But there is a grievance that initiated the
20 Bagley report. You understand that, right?
21 A: Oh, and I wasn't part of that.
22 Q: Well, you become part of the grievance 'cause
23 you sign that you allege ---
24 A: And I was ---
25 Q: --- that you were subjected to a hostile work



1 environment.

2 A: Yes. Exactly. But I did not initiate the
3 initial grievance, if that's what you're asking
4 me.

5 Q: So who asked you to sign this document
6 September 8th, 2015?

7 A: I think -- I truly don't remember in detail.
8 I just remember Al Nichols, meeting with him,
9 our attorney and him saying this is a way to
10 make sure the board knows how serious you are
11 about what you told Ms. Bagley.

12 Q: But if you had not initiated a grievance, Al
13 Nichols could not have been representing you
14 for such a grievance.

15 A: All of that came about after the Bagley report.
16 We did not hire Al Nichols until all that
17 happened. I never put the initial grievance
18 in.

19 Q: So when did you first ---

20 A: When she got put on leave, I was shocked.

21 Q: --- complain about Dr. Slayman?

22 A: I never complained. I have testified to
23 Ms. Bagley. And then from that, we were told
24 basically the board was bringing her back. And
25 I said once -- I can't work for her.



1 Q: And who did you say that to?

2 A: That I couldn't work for her?

3 Q: Yes.

4 A: Ms. Lawson in this letter.

5 Q: So was your intent is that it was either
6 Dr. Slayman or you?

7 A: Well, I guess if you want to put it that way.
8 I just knew that I couldn't work for her, and
9 in my opinion as a parent, I didn't think it
10 was safe for her to be in that position from
11 what I had witnessed personally. And that's
12 what we testified to. We requested the board
13 hear us, which is what this says, we're
14 requesting a closed-door meeting. And that's
15 what we got. So that's what this letter says,
16 and that's what we got.

17 Q: So but the fact of the matter is you continue
18 employment. Dr. King continues employment.
19 Mr. Gardner continues employment. Ms. Williams
20 continues employment. Ms. Stroud continues
21 employment. The only person whose employment
22 ends was Dr. Slayman.

23 A: (Witness nods head.)

24 Q: And that was your goal?

25 A: For the good of the district. I don't know



1 what to say. That's not what I'm here to talk
2 about. I just know that this is what we -- our
3 goal for this letter was to talk to the board
4 of trustees. And that was our goal, and that's
5 what we got.

6 Q: Well, let's be clear.

7 A: And they made the decision. We did not.

8 Q: I don't take lightly, and I'm sure Dr. Slayman
9 doesn't take lightly or anybody, when your
10 allegation is that somehow she had endangered
11 the children of Chester County. That's a
12 significant allegation. But yet you say you
13 didn't file a grievance or any concern until
14 September 8th, 2015. Did that -- all of a
15 sudden that opinion appear on that date?

16 A: I don't really know what you're asking. I'm
17 sorry.

18 Q: Well, if you truly felt that Dr. Slayman ---

19 A: This is ---

20 Q: --- was a danger ---

21 A: This is a request to meet with the board of
22 trustees.

23 Q: Well, earlier in the your testimony, you talked
24 about, oh, you were so concerned about this
25 video coverage before Defender even became a



1 part. This is years prior.
2 A: Not year -- no. Months.
3 Q: Over a year?
4 A: It was leading up to it. Things were bad.
5 Q: And Defender stayed as part of security, didn't
6 they?
7 A: I don't know what the situation is now. I'm
8 not employed there.
9 Q: You're at the Chester Chamber of Commerce, and
10 you don't know who's in the -- I mean, it's
11 been in the news frequently.
12 A: They don't come to meetings. I go to many,
13 many community meetings, and they're not there.
14 Q: So if there were, indeed, a danger to your
15 children, you wouldn't take any action?
16 A: What do you mean?
17 Q: If your testimony is that somehow the security
18 wasn't in place that's proper.
19 A: Well, they have school resource officers now.
20 But I do think they have SSOs, but I don't know
21 how -- I don't know the contracts. I don't
22 know what's happening. I'm not in the loop.
23 Q: And Defender is still operating for the
24 security of the schools?
25 A: To my knowledge. But I haven't seen them, and



1 I've not gotten anything as a parent. But I'm
2 just speaking as a parent now because I don't
3 have any ---

4 Q: And as a parent, you kept your children there?

5 A: Uh-huh.

6 Q: Sorry. For the record. Just for -- verbal for
7 our court reporter.

8 A: Yes, my child is there.

9 Q: Okay.

10 MS. POLVI: Those are all my questions.

11 MS. CLINTON - EXAMINATION BY THE HEARING OFFICER:

12 HEARING OFFICER: Okay. Now, I'm confused.

13 A: Okay.

14 HEARING OFFICER: So you need to straighten me out.

15 A: Okay.

16 HEARING OFFICER: Okay. So Dr. Slayman is put on
17 administrative leave first, right?

18 A: Yes, ma'am.

19 HEARING OFFICER: And at that point, y'all had done
20 nothing, right?

21 A: At that point, we had talked about the fact
22 that a few of these senior staff members had
23 health issues that were getting worse. We knew
24 the issues with the sheriff were escalating.
25 But had any -- I had -- I truly had no idea



1 that someone was going to put in a grievance
2 with a school board member.

3 **HEARING OFFICER:** Okay.

4 A: Which is what I read in the paper, is what
5 happened. So I did not know that was coming.
6 I had no idea exactly what was coming. Was I
7 shocked? No. But I didn't know.

8 **HEARING OFFICER:** So wait a minute.

9 A: Okay.

10 **HEARING OFFICER:** Was there another grievance other
11 than this one?

12 A: No, ma'am. I think what happened is someone
13 went to a school board member, and they alerted
14 the board chair, and the board chair put her on
15 leave. But I don't know that a hundred
16 percent. I think we'd have to double-check
17 that to make sure I'm right.

18 **HEARING OFFICER:** Okay.

19 A: But I think that's what happened. So when
20 she's saying grievance, that's why I'm a little
21 confused because ---

22 **HEARING OFFICER:** Okay. So at that point was Betty
23 Bagley employed to do an investigation? So ---

24 A: To my understanding, the school board hired
25 her.



1 **MR. WINBURN:** If I may, the -- just for the -- we
2 can go off the record or on the record. I'll
3 tell you the date of the Betty Bagley report.

4 **HEARING OFFICER:** Okay. And what is it?

5 **MR. WINBURN:** September 3rd.

6 **HEARING OFFICER:** Okay.

7 **MR. WINBURN:** The report is September 3rd.

8 **HEARING OFFICER:** Okay.

9 **MR. WINBURN:** So, yes.

10 A: So she had been interviewing us. We all knew.
11 We were told we had to talk with her, you know
12 that this was something important, to answer
13 her questions add and to do so honestly.

14 **HEARING OFFICER:** So I'm ---

15 A: So I didn't ask to speak to her, in other
16 words.

17 **HEARING OFFICER:** And you may not know this from
18 your personal knowledge. And if you don't,
19 just tell me.

20 A: Okay.

21 **HEARING OFFICER:** But how did -- then did Betty
22 Bagley know who to talk to? I mean, did she
23 just select all of the cabinet members?

24 A: It was my understanding she started with senior
25 staff. And then if we said something like we



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1 witnessed this happen, then she would talk to
2 them.

3 **HEARING OFFICER:** Was it your understanding that she
4 spoke to anyone other than senior staff?

5 A: Yes, ma'am. I think she spoke with Callie
6 McConnell, Dr. Slayman's secretary, and Jeannie
7 Ligon, our executive directive of special
8 services. Their names were on the report.

9 **HEARING OFFICER:** Did -- do you know if she spoke
10 with any of the principals or ---

11 A: I don't know.

12 **HEARING OFFICER:** Okay.

13 A: They're not on the report. So if she did, I
14 don't know.

15 **HEARING OFFICER:** Okay.

16 A: You'd have to ask her. I'm sorry.

17 **HEARING OFFICER:** Okay. So after you got that
18 report and you read the report, is that when
19 you began to realize that ---

20 A: And we were talking in the middle of all -- of
21 course, we talked. I mean ---

22 **HEARING OFFICER:** Certainly.

23 A: --- it was horrifying. The superintendent's on
24 leave. The media want to know why. All of a
25 sudden, I'm talking to the board chair to find



1 out, well, what do I tell the media that
2 she's -- no. You don't tell them anything.
3 You just tell them she's not here. Was she on
4 leave? Is she on paid -- no. You don't tell
5 them anything.

6 I mean, it was horrible. They were parked in
7 the parking lot. You'd go out the door and
8 there'd be cameras. I just can't really tell
9 you how stressful it was. So we were
10 definitely communicating. Yes.

11 And then the Bagley report came out, and that
12 was when I read it. And so I now knew who that
13 was and that and, oh, my gosh and -- because
14 there were things in it that I had never heard,
15 comments said.

16 **HEARING OFFICER:** Okay. So then after you read the
17 Bagley report, then that's when -- that was the
18 then the genesis for this letter, meaning the
19 one that was signed by all of you, which is
20 Exhibit 8, I believe. We were told that the
21 board was basically going to dismiss the Bagley
22 report or that they were just gonna bring her
23 back in and probably let her have counseling
24 or -- and we just felt very, very, very
25 strongly that they needed to hear from us. If



1 the written word was not sufficient, then they
2 needed to hear from us.

3 A: And they did grant us that after we filed this.
4 So our lawyer Al Nichols told us, if you do
5 this, it will probably halt them from bringing
6 her back in.

7 **HEARING OFFICER:** And so did the board actually
8 speak to you -- each of you?

9 A: As a group, yes, ma'am.

10 **HEARING OFFICER:** As a group.

11 A: We sat down and conveyed to them basically what
12 was in the report, asked if they had questions.
13 It was a very tense meeting, very difficult
14 meeting.

15 **HEARING OFFICER:** From the standpoint that there
16 were hostile board members?

17 A: Yes, ma'am.

18 **HEARING OFFICER:** So you were an employee of the
19 district for the entire period of time that
20 Dr. Slayman was there?

21 A: No, ma'am. She hired me. She had been on the
22 job several months. I don't remember how long
23 when she hired me. I had worked for an
24 after-school grant. So that what I was -- it
25 was just an odd -- so I'd been associated with



1 the district but not ---

2 **HEARING OFFICER:** Okay.

3 A: --- a direct employee.

4 **HEARING OFFICER:** Okay. And so you -- that was in
5 2012?

6 A: Yes. And I had been working as a -- I'm a
7 certified teacher, so I had been working as an
8 after-school teacher in a 21 Century program,
9 if you're familiar with that.

10 **HEARING OFFICER:** I am.

11 A: So that's what I had been doing when I came in
12 to do the PR work.

13 **HEARING OFFICER:** Okay. And so you were there from
14 2012 to ---

15 A: I left in April of 2016.

16 **HEARING OFFICER:** So you were there after -- you
17 stayed for a period after Dr. Slayman left?

18 A: Yes, ma'am.

19 **HEARING OFFICER:** Okay. All right. And the Olde
20 English Consortium was -- that was the 21
21 Century?

22 A: No. That was my first job that brought me back
23 to the district. It was a Teaching American
24 History grant.

25 **HEARING OFFICER:** Okay.



1 A: And I was director then. And I worked for
2 Dr. Mike Fanning ---

3 **HEARING OFFICER:** Okay.

4 A: --- for five years. And then it was not
5 renewed by the State -- by the federal
6 government, and then I ended up working for 21
7 Century.

8 **HEARING OFFICER:** Okay. You've just enlightened me
9 because I thought that the Bagley report came
10 after that grievance.

11 A: No, ma'am.

12 **HEARING OFFICER:** So -- okay. All right.

13 A: I was not part of that initial -- I was sucked
14 in to the Bagley investigation. As some --
15 Jeannie, several of us were 'cause we witnessed
16 things. So when the would talk to someone and
17 say tell me what happened, I would slit her
18 throat, Ms. Clinton, can you come and verify
19 that? Yeah, I can. So it was very -- and
20 that's what I needed to be clear. This was why
21 it was so emotionally hard for me. I cared
22 about her.

23 **HEARING OFFICER:** I understand.

24 Okay. Any further questions from anybody?

25 **MS. POLVI:** I do.



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MS. CLINTON - RECROSS-EXAMINATION BY MS. POLVI:

1
2 Q: You indicated that the September 8th, 2015,
3 grievance was the first one that you're signing
4 to essentially?

5 A: Yes, ma'am.

6 Q: Who asked you to sign to this document? Well,
7 let me backtrack.

8 Accurate to say you did not type this document?

9 A: I really don't know. I don't remember. I
10 could have. I could have -- I don't know. I
11 just remember it was at the advice of
12 Mr. Nichols. So if I typed it, maybe he
13 e-mailed it. I don't know. I'm sorry.

14 Q: And the Bagley report was released publicly
15 after it was not supposed to be. Do you know
16 who published it?

17 A: I do not. But I was not very happy about it
18 because it has continued to haunt me in my
19 current public position. So I was not happy.
20 It hurt me. But the names were redacted, but
21 in a small town people know. So it hurt me as
22 well.

23 Q: And you, earlier in your testimony, referenced
24 that your understanding is that the grievance
25 started by a person going to a board member.



1 Who was the person, and who was the board
2 member?

3 A: I truly do not know. I have a guess, but it
4 would be a guess. Because I do not know. I
5 was never told by that person. So I don't feel
6 like I could tell it ethically.

7 Q: But, again, it's pertinent in terms of kind of
8 who's kind of leading this as ---

9 A: Not if it's a guess. I can't say it. I'm
10 sorry. Because I don't know. I was never --
11 that person never said, I did this. I just
12 have a strong hunch.

13 **MS. POLVI:** Ms. Pike, wouldn't you agree that if a
14 strong hunch is important for her testimony
15 that ---

16 **HEARING OFFICER:** No, I would not. If she does not
17 know it within her personal knowledge, I think
18 it's perfectly appropriate for her to decline
19 to answer.

20 Q: But you are certain, at least based on what
21 you've already testified to, that it was a
22 person going to a board member?

23 A: And it might have been more than one. I don't
24 know for sure. I can tell you beyond a shadow
25 of a doubt it was not me.



1 **MS. POLVI:** Those are all my questions.

2 **HEARING OFFICER:** Okay.

3 **MR. WINBURN:** No questions from me.

4 **HEARING OFFICER:** No questions from me.

5 (Off the record.)

6 (Witness excused.)

7 **HEARING OFFICER:** We will be ending for today.

8 However, we will pick back up with the hearing
9 tomorrow at 1:00 o'clock. And we will also
10 continue this hearing on October the 12th. The
11 time is to be determined. We will continue
12 with Mr. Winburn's witnesses at 1:00 o'clock
13 tomorrow. All of his witnesses will remain
14 under oath, and we will have them available by
15 telephone if need be.

16 (There being nothing further, the administrative
17 hearing concluded at 7:20 p.m. and resumed October 4,
18 2018, at 1:18 p.m.)

19 DAY TWO - THURSDAY, OCTOBER 4, 2018

20 **HEARING OFFICER:** All right. We're back on the
21 record with in the matter of Dr. Agnes Slayman.
22 That would be Certificate Number 134958. This
23 is a disciplinary matter.

24 And today I believe that our first witness is
25 Ms. Anna Stroud?



1 Would you let the court reporter please swear
2 you in?

3 **ANNA STROUD**, having been duly sworn, testifies as
4 follows:

5 **MS. STROUD - DIRECT EXAMINATION BY MR. WINBURN:**

6 Q: Ms. Stroud, will you please state your full
7 name for the record?

8 A: Anna Bost Stroud.

9 Q: And will you give us your -- just tell us a
10 little bit about your work history and where
11 you are currently working.

12 A: I worked for about 19 years with the City of
13 Chester, and I had various jobs there, payroll,
14 accounts payable, treasurer, also the dreaded
15 tax collector at some point. After that, I
16 worked for about six months at the -- at
17 Chester County. They had a new position open
18 there, an accounting supervisor job, and I took
19 that. And after six months, an opening became
20 available in the finance office at the school
21 district. And I applied for that job. Its
22 title was accounting supervisor.

23 Q: Okay.

24 A: And that was in 2001. I started working
25 August 2001.



1 Q: And where are you now? I know you said that,
2 but I may have ---

3 A: Yes. The board graciously eliminated my job at
4 the end of my TERI as executive director of
5 finance, and I am currently working for Wayne
6 Goodyear, who is an accounting practitioner in
7 Chester.

8 Q: Okay. He's an accountant?

9 A: Accounting practitioner.

10 Q: Okay. Wayne Goodyear. Okay. And what kind of
11 work do you do with Mr. Goodyear?

12 A: We are -- his firm does books for the small
13 businesses in Chester. We run payrolls, and
14 also he does taxes, corporate taxes and
15 personal taxes. So I'm responsible for the
16 books on about five or six companies. I run
17 about eight to ten payrolls a month but not --
18 some are weekly, biweekly. And then I also
19 assist him in preparing a small -- they're not
20 audits because he's not a CPA, but we do a
21 thorough review of some nonprofit organizations
22 and assist in answering questions on taxes.

23 Q: And do you consider yourself a good bookkeeper?

24 A: Yes, sir.

25 Q: That's the right term?



1 A: Yes.

2 Q: I'm a terrible bookkeeper, I would say.

3 A: I am probably with my personal records, but I
4 do the others', I think would -- could say
5 exemplary.

6 Q: Well, of course, we're here today in connection
7 with allegations against Dr. Slayman, that her
8 behavior and treatment of employees created a
9 hostile work environment. Is that your
10 understanding of why we're here?

11 A: Yes, sir.

12 Q: It's also my understanding you were -- you
13 signed a grievance along with Charles King,
14 Jeff Gardner, Shawn Williams, and Brooke
15 Clinton?

16 A: Yes, sir.

17 Q: Just in general -- we'll get more specific in
18 a minute -- can you tell me or Madam Hearing
19 Officer why you felt compelled to sign and
20 formally file a grievance against Dr. Slayman?

21 A: Dr. Slayman came to the district in January of
22 2012. And for most of the first year, I had,
23 what I would consider a great working
24 relationship with her. I had a lot of respect
25 for her. In her -- I meant, she's a very smart



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1 woman. Had some very, very innovative ideas
2 for our district. And there came a point that
3 she began to -- she just started having issues
4 with people outside of the district where she
5 would make decisions based on her feelings. A
6 person made her angry, she would cut them off,
7 you know, alienate them. Wanting -- can I give
8 examples now?

9 Q: Sure. I was gonna ask for those.

10 A: One example that is really striking is for
11 years and years, the district had had a working
12 relationship with York Technical College where
13 they did dual enrollment for students via
14 distance learning labs. And I'm -- I don't --
15 I wasn't present in the meetings. I don't know
16 what happened, but in our senior staff
17 meetings, she would talk about the director of
18 York Tech or -- not the president 'cause he's
19 in Rock Hill -- but this is the Chester
20 office -- and she just was angry. And from
21 that, she's wanted to discontinue that
22 relationship with them even though they were
23 getting to a point where they wanted to offer
24 more courses to the students.

25 And because the -- they had the Chester office



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1 there -- I mean, the Chester building, the
2 college, they were in a position to do more for
3 our students. So through that, she cut that
4 group off and then started a relationship or
5 increased a relationship that we already have
6 with USC Lancaster, which was in the -- of
7 course in the adjacent county. And what I see
8 that, you know, that, I know, hurt the children
9 because, one, it lessened the number of the
10 courses there were available to take to
11 possibly use in going towards college free of
12 charge.

13 And after her leaving -- I just do want to
14 point that out -- that that relationship was
15 repaired. And I can say, to just demonstrate,
16 how much it hurt children. My son will
17 graduate in May with an associates degree from
18 technical college before he graduates in June
19 with high school.

20 Q: Now, York -- sorry. Go ahead.

21 A: He and two -- one other child are the only two
22 that are doing that. And so many children
23 missed an opportunity for that.

24 Q: And the dual enrollment, so I'm clear, with
25 your technical college, they had a presence in



1 the county?

2 A: Right.

3 Q: And so the decision to use Lancaster would have
4 required students who wanted to participate in
5 dual enrollment to travel outside the county to
6 Lancaster?

7 A: Some -- it was -- they -- she was working to
8 get it set up to where they would be able to do
9 the dual enrollment, but it was at a cost of us
10 having to change out the technology to suit
11 that. So she did -- the -- I believe that we
12 did have dual enrollment courses with them. In
13 the Chester area, there were -- there was
14 already a relationship with the other two high
15 schools that are close to Lancaster where kids
16 were already going there for that.

17 Q: I see. The -- you mentioned senior staff. Can
18 you name those individuals who would be
19 considered senior staff?

20 A: When I first -- when Dr. Slayman first came, it
21 was Shawn -- she was Clinkscales then -- but
22 Williams and myself. The person -- the
23 previous associate superintendent for
24 operations who was Colonel Blair Turner. And
25 after Colonel -- well, actually shortly after



1 Dr. Slayman came, she hired Charles King, so
2 then he was our fourth member.
3 After a short while, Dr. Slayman, because of
4 all the phenomenal things she was doing for our
5 district, she needed someone to help with
6 public relations. Brooke Clinton had worked
7 with us previously through a grant program and
8 did a little bit of PR then, and I suggested to
9 Dr. Slayman that she talk with Brooke. And she
10 did and began to use Brooke just for small PR
11 projects and then eventually brought her on
12 part-time and then brought her in. And she was
13 part of our senior staff.
14 Q: Okay.
15 A: And after Colonel Turner had passed away, Jeff
16 Gardner was -- so basically when Dr. Slayman
17 left, it was Charles King, Shawn Williams,
18 Brooke Clinton, Jeff Gardner, and myself.
19 Q: Which are the five individuals who decided to
20 officially file the complaint; is that correct?
21 A: Yes.
22 Q: Okay.
23 A: And you had asked what led to that. So ---
24 Q: Sure.
25 A: --- I brought up the -- that issue just as a



1 demonstration that there were things that she
2 was doing that she was making decisions that
3 weren't in the best interest of the students
4 based on emotions.

5 Things began to continue to get worse because
6 she developed a relationship with a group of
7 individuals who -- older men, white men, that
8 she began to trust, accept their advice. We
9 tell -- she met with them every morning --
10 would tell us that they were her political
11 advisors and that she had to do the things they
12 wanted to do -- wanted her to do or they would
13 ruin her in our county. She stopped listening
14 to our advice.

15 She -- one of the instances -- and I know that
16 will prepare the issue with our school resource
17 officers -- where she got angry at the sheriff
18 because he had embarrassed her by having one of
19 his officers infiltrate one of our schools just
20 so show how easy it would be for someone to get
21 into a school. And from that point on, she did
22 everything to get the sheriff's department out
23 of the schools. And that was supported by her
24 breakfast club because the sheriff, who is an
25 African American, was not popular. He was our



1 first African American sheriff. And that's not
2 who they wanted in, so ultimately that's not
3 who she wanted in our schools.

4 Q: Did you ever hear her say anything specific
5 about the sheriff that you can testify to,
6 positive or negative?

7 A: She actually -- when he was elected -- excuse
8 me -- she went to his swearing in ceremony.
9 And she said there she was surprised that there
10 weren't other elected officials there in
11 support of him. And I think I may have even
12 commented to her that that was because he was
13 black and they weren't supporting him. They
14 didn't want him in. He is someone I've known
15 for all -- practically all my life. And I have
16 great respect for him and his father, who's a
17 great person and leader in our community.
18 And I think need to also mention my husband is
19 a law enforcement official and has been for --
20 I don't know -- probably 40 years now or more.
21 And he was a school resource officer at
22 Louisville High School, but he had left the
23 school. The -- he was in there the year
24 before the changes began, so he was already
25 out.



1 Q: And that's before Defender came in?

2 A: Yes, sir.

3 Q: Okay.

4 A: And he was -- he transferred to the security
5 over at the courthouse. So I -- I believe
6 Dr. Slayman thought that I possibly was leaking
7 information either to -- directly to Sheriff
8 Underwood or through my husband to him because
9 of that relationship. So I know that that is
10 possibly questions. I did want to point but my
11 husband was not in jeopardy of losing his job
12 because of the change.

13 Q: So did you have any involvement -- as finance
14 director -- executive director of finance, did
15 you have any involvement with the determination
16 to move away from the SROs to the SSOs supplied
17 by Defender Industries?

18 A: It could be, Defender.

19 Q: Yeah.

20 A: It was -- there was a great deal of decision
21 during the budget process of potential costs of
22 it. I never actually saw a contract. While
23 Dr. Slayman was there, I believe -- I don't
24 know that I ever saw a signed contract, but I
25 did see a contract they were working under



1 after she left.

2 Q: In general, would you see contracts?

3 A: Yes. They -- I was supposed to have a copy of
4 them on record.

5 Q: So all contracts in the district would -- you
6 would have a copy as finance director ---

7 A: Right.

8 Q: Is that fair to say?

9 A: Right. And when the auditors came in to look
10 at them, we were supposed to have a copy of
11 them, of course, in order to pay to set up a
12 purchase order because ever -- the board policy
13 required that all purchases of services or
14 goods have a preapproved purchase order. So
15 whenever they ordered, they'd actually get a
16 purchase order in so that it would be valid
17 before they started working. I should have
18 that so I could get that set up. I did not, so
19 they started without a purchase order in place.
20 That was something that, of course, we took
21 care of after the fact so that we would,
22 indeed, have one to pay them along for the
23 year.

24 Q: And you mean after Dr. Slayman left the
25 district?



1 A: No. It was actually -- I did go ahead and --
2 I was given amounts that I could go -- once
3 they started sending in bills ---

4 Q: Okay.

5 A: --- I could project out what it would be and
6 set it up.

7 The issue with the school changing, as I
8 mentioned earlier, my son's graduating from
9 high school, my son was in high school. And in
10 general, I think that having security in all
11 the schools is great. God forbid anything ever
12 happened, but I think it's key in the high
13 school areas. In the Louisville and Great
14 Falls areas, the -- it's -- they're smaller
15 schools, and you have pretty much the same
16 problems you'd have at Chester High School.
17 But the numbers are smaller. The students are
18 less, so you -- it just doesn't appear to be as
19 bed.

20 Chester being the area that had the intercity,
21 as it would be called ---

22 **MS. POLVI:** Uh-huh.

23 A: --- had a lot more problems. And to the point
24 that the board had approved, in addition to the
25 SRO that the County shared the cost of, the



1 district paid for an additional officer to be
2 there by the hour every day. And it would
3 rotate. Whoever -- they would rotate officers
4 in as whoever it could be. But many different
5 officers would work. So there were two
6 uniformed officers there to provide security.
7 And I had a concern for my child's safety
8 because that presence was taken out, to the
9 point that my husband and I discussed with our
10 child that should there be a shooting, that he
11 not listen to anything that the security
12 officer told him and to make his way home. We
13 live pretty much within a stone's throw, if a
14 major leaguer could throw a stone from our
15 house, to the high school. And I -- we'd let
16 him know.

17 And that was very difficult for us because my
18 husband's a police officer, and respecting
19 authority is something we do instill in our
20 children. But we did not feel comfortable the
21 security officer would be the best resource for
22 him, should something occur and, you know, told
23 him we would deal with the repercussion or
24 fallout after he's secured.

25 Q: Do you have any direct knowledge of whether



1 there was communication between the Defender
2 employees and the sheriff's office that you
3 could testify to?

4 A: The only one that I am certain of, we hired --
5 while we contracted with Defender, we hired a
6 gentleman who would be the liaison. I don't
7 recall what his title was. He was the police
8 chief for the City of Chester and was recruited
9 by Dr. Slayman to come and be this -- in this
10 position. So I know beyond a shadow of a doubt
11 he would have had contact with the sheriff up
12 to that. Afterwards, I'm -- I don't know.

13 Q: Were you involved in the hiring of -- I think
14 this gentleman's named Andre?

15 A: Andre Williams. Thank you. I couldn't think
16 of it. I was not involved in his hiring. I --
17 it wouldn't have been an interview process that
18 I would have been included on. I was involved
19 with setting up his pay. As part of building
20 the budget, the amount that was taken out of
21 the line item where we had -- were -- had
22 contracted for security and -- which -- when we
23 were working Chester County and paying the
24 county, it was set up a contractual agreement.
25 So we pulled an amount out and put it in the



1 budget for salaries and benefits, the salary
2 of, \$38,000.

3 When Mr. Williams was hired, I was contacted by
4 Shawn in HR, and she asked me to gross up his
5 salary so that his take-home pay would be 38-,
6 \$39,000. So what that means is you have to
7 determine how much he would pay in Social
8 Security, taxes, retirement, and any other
9 deductions he may have. Of course, insurance
10 would be included. And then that would then be
11 his gross so that at the end of the day when
12 you take all that out, it would net out to that
13 amount.

14 Q: Do you remember the span of time between the
15 time the gentleman was hired and the time Shawn
16 Williams told you to gross up the salary,
17 approximately?

18 A: I believe I was asked to do that and provide
19 her the amount before he came in to talk with
20 her and sign his paperwork, which, you know,
21 he -- understandably he's leaving a job, a
22 career job. Before he signed this paperwork,
23 I'm sure he wanted to have that information
24 available to him.

25 Q: Can you think of any other employee that you



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1 were involved in the, I guess, financing
2 aspects of the budgetary aspects of a hire, do
3 you ever recall this happening before or since?

4 A: The only position where salary is grossed up is
5 the superintendent's position. And it's
6 grossed up for insurance. If in the contract
7 we agree to cover their insurance ---

8 Q: Uh-huh.

9 A: --- you still have to show that it's a
10 deduction for the Internal Revenue Service. So
11 you add that to their salary. And because
12 Dr. Slayman didn't get a car, she was given a
13 certain travel allowance, so we, of course, had
14 to do the same there. But other than that,
15 we've not ever ---

16 Q: Who did you understand -- or was -- was it
17 Shawn Williams that was directing the grossing
18 up of the salary?

19 A: She told me that Dr. Slayman had told her to
20 gross it up so that -- and you're either a
21 numbers person or you're not, so that is
22 something that I would have to do. Shawn
23 didn't have the availability or the computer
24 system that we use. Personnel's personnel;
25 finance was finance. So she would not have



1 been able to run a mock payroll to determine
2 who those numbers were.

3 Q: Uh-huh.

4 A: They had to come from me.

5 Q: I'm not a number's person either. I wrote down
6 grossed up. I want to ---

7 A: And that's why I explained what that was.

8 Q: --- use that one day. Got to gross my salary
9 up.

10 A: Sounds like an ugly thing.

11 Q: Yeah, I know. So what else ---

12 A: Led us to that. Okay. I keep getting
13 distracted ---

14 Q: No, no. I'm just trying to, for the benefit of
15 the hearing officer, just trying to get some of
16 this. What -- I don't think I've asked you
17 this yet. Where was your office in relation to
18 Dr. Slayman's and the rest of the senior staff?

19 A: The way our building was constructed, you had
20 two sides. Operations -- it wouldn't have
21 intended to be. And the other side was
22 instruction. But on the instructional side,
23 you had HR and IT. So Shawn was -- we were on
24 diagonal opposites in the building. It's not
25 a huge building, nothing like this. But on our



1 side of the building, I had a corner office.
2 And then Mr. Gardner was two doors down from
3 me. Dr. King was the next door down a small
4 hallway. And Brooke Clinton's office, and then
5 Dr. Slayman's office.

6 Q: Can you describe or tell -- give us a number of
7 times you would see Dr. Slayman on a weekly
8 basis, daily basis?

9 A: Dr. Slayman was one of the hardest working
10 people. I think she would take a week's
11 vacation; she was there every day. And so I
12 would see her every day.

13 Q: And would she call you on the phone?

14 A: She would occasionally in the office or on my
15 personal phone, if she needed me. We --
16 after -- because of the recession that occurred
17 earlier, we had cut back as many things as we
18 could, so it was a very limited number of folks
19 that had a cell phone. And times were getting
20 better and Dr. Slayman felt that it would be
21 important for more of us to have phones. I did
22 not want to carry two phones, so I chose not to
23 get a district phone and I used my personal
24 phone. And she said that was fine, but I'd
25 better answer it. You know, any emergency, I



1 had to answer it. And for me personally, there
2 are no emergencies in finance. Handle it.
3 We'll figure out the money. Because if it's an
4 emergency, that is the one thing as far as
5 purchases that the board -- not one thing but
6 one of the things more excluded -- required a
7 preapproved purchase order for.

8 Q: Right.

9 A: But she did call more often if she -- at first
10 she would actually maybe come to -- down, ask
11 a question. Sometimes she would come in, sit
12 down, you know, talk. She might have somebody,
13 and we'd go over something. But it began to
14 where Ms. Callie her secretary, would come find
15 us. And we began to refer to it being summoned
16 in Dr. Slayman's office.

17 Q: And you say, "we." Who is we would refer to is
18 as being summoned?

19 A: Primarily the senior staff.

20 Q: And can you just describe in any other terms,
21 why did you give it that label for being
22 summoned? What does that mean to you?

23 A: You're being called in; something's wrong;
24 you've done something, you know. She's angry.
25 She's upset.



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1 Q: And how often, if you could put a number on it,
2 would you be summoned during the week during
3 the -- or during the day?

4 A: It was very frequent. I really -- I couldn't
5 put a number on it. I -- it was not unusual
6 for it to occur. I don't want to say every
7 day. It was every week.

8 Q: When you would be summoned, in general, that
9 meant that you would have a meeting of some
10 sort in Dr. Slayman's office?

11 A: It would mean that of some sort, a meeting of
12 sort.

13 Q: All right. When you did have these meetings in
14 Dr. Slayman's office, was the door open or
15 closed generally?

16 A: Generally closed.

17 Q: More often than not? 90 percent of the time?
18 Can you put a number on that?

19 A: I would say that we would meet in her office,
20 the door -- any meeting in her office,
21 90 percent of time, the door was closed.

22 Q: Okay. Hostile work environment, based on the
23 allegation -- and that's just broad -- broadly,
24 I guess I'm generally -- I'm asking. Any other
25 specifics that you can relay to the hearing



1 officer about statements made in your presence,
2 statements made to you by Dr. Slayman that
3 caused you concern?

4 A: I can. And but before that, I want to -- I
5 guess I was building up to more. After the
6 first year and Dr. Slayman had started to get
7 angry with outside individuals and make
8 decisions based on that, during that time
9 Dr. Slayman began to -- and I'm not gonna say
10 attack me. Because even though I did hear her
11 say things to other people, I cannot say that
12 she said things directly to me as far as I'll
13 cut your throat. She didn't say those things
14 to me. There was once that she called us in
15 and one of the members of us had given
16 information to someone who told it to someone
17 she did not want it -- so she did call us in
18 and line us up and say, look us directly in the
19 eye, did you tell? Did you tell? Did you
20 tell?

21 And at that time, she said I will cut your
22 knees out from under you if you, you know, told
23 and that sort of thing. So it was as a group.
24 I was not the one to tell. So I didn't -- you
25 know, yes, she said that. I didn't feel like



1 she was gonna cut my knees out. I know that
2 that meant hurt me in my job. There was no
3 physical fear from that. But so she would
4 attack me on my job. She was constantly
5 finding or creating problems that were not
6 factual about my job performance and about
7 finance. And then she would come to me after
8 she had gone to the board members and, you
9 know, created this problem and, you know,
10 presented problems to them about my job and
11 then come back and come to me and then those
12 things would be corrected.

13 Q: You mean for instance ---

14 A: But she wouldn't go back to the board and
15 correct them. She continued to allow the board
16 to think I was not doing a good job.

17 One instance is at a board meeting where I was
18 presenting a resolution to approve a resolution
19 for a bond, a journal obligation bond. As I'm
20 presenting it for my material -- and I asked
21 the board for an amount and, the board looks
22 confused, and they interrupt me, and they're
23 like how much did you say. And the amount that
24 they were looking at was not the amount I was
25 requesting. I was reading from the -- a copy



1 of the information I had e-mailed to
2 Ms. McConnell who had prepared their reports.
3 And once I -- they were telling me what they
4 were looking at, I -- it was -- clearly, they
5 were looking at last year's, the previous
6 year's request, which was a higher number.
7 Thankfully, because they approved my lesser
8 number. But -- and I apologized because I knew
9 what I sent because I knew what I had. And I
10 apologized for the error, as ultimately my
11 department's my responsibility to make sure
12 they have the correct information.
13 So when they went into executive session,
14 Ms. McConnell and I went to her office, and she
15 pulled up -- and it was in the e-mail, and I
16 honestly believed that when she was creating
17 their packet, she inadvertently pulled the
18 wrong one. Accidents happen. We're all human.
19 But the next morning, Ms. McConnell came to my
20 office and grabbed me, and I was summoned in,
21 of course, expecting, you know, to be raked
22 over the coals because, you know, we were --
23 and she lit in on us pretty good and wanted to
24 know what happened. And I said, we might have
25 to let Ms. -- we call her Ms. Callie -- let her



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1 explain.

2 And she did, and then it was okay. But that
3 was not something that, to my knowledge and
4 based on how I was treated by the board
5 members, I don't believe that she ever let the
6 board know that wasn't my mistake. I don't
7 know. There were -- I'm trying to think.
8 Maybe we can come back to that.

9 Q: Sure. That's fine.

10 A: Oh, I forgot one.

11 Q: I'm sorry?

12 A: I do have one.

13 Q: Okay.

14 A: Dr. Knox was the principal at Louisville High
15 School and one of Dr. Slayman's confidants.
16 Often we were discussing matters in senior
17 staff, she would stop and go call Dr. Knox and
18 ask him what he thought. So even though he
19 wasn't a member of senior staff, his opinions
20 weighed heavily on the decisions.
21 But one of the issues, he had it for years even
22 before I became the -- over finance, our
23 auditors had -- in each audit, would question
24 and have concerns about the schools and the
25 lack of security. It's kind of a standard



1 oversight, just a concern. And we had been
2 working towards consolidating all of the
3 schools. And by consolidating the schools,
4 what we would do at that point is they would no
5 longer write checks out of checkbooks. And it
6 would become centralized in our office where we
7 were processing all of the checks.

8 We had phased in all of the elementary schools,
9 and we were in the process of working with
10 middle and high schools. And this is something
11 that our audit firm had assisted us with,
12 recommended. And it was when they had -- they
13 actually stopped including that concern in
14 their management letter because we were moving
15 towards this. Excuse me.

16 Q: Hold on a second. I'm gonna walk up over there
17 to you.

18 A: When our -- the girl in our office, our
19 accounting -- our accountant -- her name is
20 Ashley, was an accountant. She went to
21 Louisville High School and -- to do one of the
22 annual or semiannual reviews of their books.
23 And she talked with the bookkeeper there about
24 this process. And the plan was to move them
25 next. And she included Dr. Knox in that



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1 conversation.

2 And Dr. Knox did not want that. So he went to
3 Dr. Slayman. He prepared a letter and sent it
4 to Dr. Slayman on behalf of all the principals,
5 who did not sign on it but, according to him
6 that I was overstepping my bounds, that, you
7 know, I was trying to take over and control
8 their schools. I don't think he included in
9 the letter, but he had often said to me, it's
10 my money, that sort of thing, not that I'm
11 excusing him of anything inappropriate. He
12 just was not -- he just didn't think he could
13 operate that way.

14 And so then Dr. Slayman went to the board -- I
15 know in front of me she discussed it with the
16 board chair at the time, Mrs. James, that that
17 was wrong and what I was doing wrong, and it
18 was never corrected that that was what we were
19 implementing and that was recommended by our
20 audit firm to do that for the betterment and
21 security funds.

22 Q: Now, I handed you what was proposed Exhibit 11.
23 It's been marked for identification. Looks
24 like some of the notes are cut off the bottom.
25 Can you identify that for the record?



1 (Petitioner's Exhibit Number 11 was introduced into
2 the record at this time.)

3 A: I'm gonna reach in and get my reading glasses.

4 Q: Okay.

5 A: I can tell without the reading glasses, it's my
6 handwriting. And I believe I wrote this and
7 gave it to Ms. Bagley.

8 Q: Okay. And then the last two pages are
9 typewritten with your name at the top; is that
10 fair to say on that? Actually, the last --
11 well ...

12 A: Yes.

13 Q: It's the third to the last page?

14 A: Yes.

15 Q: Are these your notes?

16 A: Let's see.

17 Q: Does it look familiar?

18 A: Let me read it. Yes.

19 Q: Okay. One of the topics -- maybe one of the
20 main ones that seems to be identified in the --
21 in your notes relates to FMLA. Can you tell
22 the hearing officer about that issue?

23 A: Yes. Before Dr. Slayman came to work with us
24 several years prior, my mother was ill. She,
25 in 1991, had a liver transplant and some



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1 medications from that point that caused her to
2 have diabetes, that she did not become aware of
3 until she had other issues. And she was
4 diagnosed with end renal kidney failure. After
5 that time, she began taking dialysis.

6 Q: At what year was this?

7 A: I'm not certain. She was on dialysis for
8 several years. She was a spunky little lady.
9 But her body had just deteriorated to a point
10 that she no longer needed to be at home alone
11 and -- or drive. So my husband and I converted
12 our garage and built a mother-in-law suite, and
13 she moved in with us. And she had to take
14 dialysis three days a week and had to be at the
15 dialysis center -- I don't know -- 5:30,
16 6:00 'clock every day morning. And so I, you
17 know, had to take her to dialysis and work, and
18 worked late evenings. Had to -- you know, I
19 took care of her, had a job, had two children.
20 And that -- she lived with us for a number of
21 years, four or five.

22 And then she deteriorated to the point that I
23 had to put her in an assisted living facility,
24 which I'm really okay with and I've told my
25 children that's fine if you need to do it for



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1 me. But it was hard on my mother, and she
2 wasn't okay with it and never let me forget
3 that. But once I had moved her there, it -- I
4 became ill. I was still doing her laundry and
5 going to see her every day. Thank God she was
6 able to be in Chester at that time. And I can
7 remember one evening specifically I'd done her
8 laundry, and I was not able to -- I didn't feel
9 well enough to take it. I had my son, oldest
10 son take it to her.
11 That's when I can first recall having -- being
12 so exhausted that I couldn't do anything. And
13 I just assumed that it was my body catching up
14 on the rest it needed or so I thought. And
15 after that, I don't recall being sick -- I
16 mean, for any -- like for days or anything, but
17 I would -- I just would feel exhausted. My
18 arms walk ache. My legs would ache. I would
19 always feel like I had just overworked my body
20 even though I had done nothing. And prior to
21 that, I was not someone that was ever out sick
22 unless I'm taking care of my mother or my
23 children. I just, you know -- so it was weird
24 to me. And I just, again, assumed it was
25 exhaustion.



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1 And so this occurred, prior to Dr. Slayman
2 coming, but it did continue. My mother
3 actually passed away in June before Dr. Slayman
4 came in January. So I was having to be out
5 frequently. I was -- and honestly -- and it
6 continued and I can say that with Dr. Slayman,
7 it wouldn't probably be unusual for at least
8 once a week, if not every other week, I did not
9 feel well, to the point that I really couldn't
10 come to work. I was also having frequent inner
11 ear infections, and inner ear infections are
12 debilitating to the point that you have vertigo
13 symptoms where you cant stand; you can't walk.
14 And Dr. Slayman was not a person that was sick.
15 As I mentioned, she was at work everyday. And
16 I don't think that she truly believed I was
17 sick. And she, when I'd have to be out with --
18 she never said I don't believe you're sick, but
19 she would let me know she was unhappy because
20 she would -- well, when am I gonna get this?
21 When am I gonna get this?
22 And it continued for a few months. And I
23 was -- one morning I called in because I had
24 the inner ear infection, and she -- when am I
25 gonna get this? And so when I get to my



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1 doctor, I'm in tears as I'm meeting with him.
2 And I'm telling -- you know, he's of course
3 giving me something for the inner ear infection
4 and I had already been telling him I'd had
5 these symptoms. And so I just -- he actually,
6 at that point, was ready to give me a -- an
7 antidepressant because he sees me crying. I
8 can't sleep. I'm tired. These are symptoms.
9 And I told him that I did not believe I was
10 depressed. And I'm sure that's what all
11 depressed people say. I'm felt something else.
12 Because of my age -- I'm 55 now, so I'm 50-ish
13 at that time. I don't know.
14 I told him let's run some -- tell me. Let's
15 find out what's wrong with me because, you
16 know, I can be a little paranoid and, you know,
17 I feel like I have hypochondriac tendencies.
18 I'm sitting here think, okay -- cancer.
19 There's something wrong with me. This isn't
20 right.
21 And so he agreed to run blood work, and if
22 nothing came back, then I would need to
23 consider it might something I needed an
24 antidepressant for. And I get a call with --
25 I think it was within 24 hours, and My Vitamin



1 D and B were very, very low. So I was -- I
2 began taking shots and taking Vitamin D. And
3 that may have helped with the energy level, but
4 it did not help with the pain. And so I went
5 back to him one day after being in pain for
6 about nine days. And when he saw me then, he
7 realized that it wasn't just the vitamin
8 deficiencies and it wasn't depression. And he
9 said I want to one more series of tests, and if
10 nothing comes up, I'm gonna need to refer you
11 to a specialist.
12 Nothing showed up. He referred me to, I
13 believe, a neurologist, and I was diagnosed
14 with fibromyalgia. And up to that point,
15 everyone I knew who had fibromyalgia had had to
16 retire on disability. I had a son that was
17 nine or ten, and that wasn't acceptable to me.
18 But it's not something I had a choice on. So
19 I told Shawn that this was the case, and she
20 told me that I needed to get an FMLA form so
21 that if -- or a form completed so that if --
22 you know, that that would protect me if I
23 needed to be out for this.
24 So on another visit I did. I took the
25 paperwork, and I later received it in the mail.



1 And I held on to it because I didn't want to
2 open it. I didn't want to read it. And
3 finally I did. And what it wasn't looking
4 forward to seeing is the cure. This the a
5 life-long illness. So finally I made a copy
6 and I took it and I put it in an envelope and
7 put it in the mail slot for Deloris Jackson,
8 who is our benefits coordinator, and that is
9 the -- was the process.

10 And well, I had done what I was told to do.
11 And I have to say that, unfortunately, I didn't
12 know what was supposed to happen after that.

13 Q: What year was this, you think?

14 A: '13.

15 Q: Okay.

16 A: But I had turned it in -- and it was about a
17 year before Dr. Slayman left. So I turned it
18 in and I just continued to work. Now, I would
19 be late for work. I -- if I said it was every
20 day, that would not be accurate. But it was
21 more days than not. And part of the
22 fibromyalgia -- and it was written in the
23 paperwork by the doctor that it -- in the
24 mornings often causes problems with starting,
25 and, you know, he had listed the problem that



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1 it could -- how it could impact my job. And
2 whenever I was absent from work, you know, I
3 just -- if I was sick, I filled out I was sick
4 or whatever with fibromyalgia or whatever
5 caused it to be or whatever.
6 And at some point, Shawn said to me, you know,
7 every year you need to update your FMLA. And
8 I wasn't -- as far as the time line, I had not
9 documented when that would be. I'm not
10 necessarily organized at home, and paperwork
11 goes in a pile until it's needed, and I go
12 through that. And so I e-mailed Deloris
13 Jackson and asked her if she could give me a
14 copy of the form. I understand I have to
15 update this annually and need to verify the
16 date it was last completed so I can make sure
17 I have my doctor complete a new one. Also I
18 need a blank form and ask -- and apologize for
19 asked asking.
20 And she responded back that Shawn had kept my
21 paperwork when I gave it to her to sign and she
22 thought she gave it to Ms. Slayman. Not sure.
23 I don't know where it is. So I asked Shawn
24 about it and she said that when it came in,
25 Deloris let her know that it had come in, and



1 she called Dr. Slayman because Dr. Slayman had
2 been asking for it, you know, it's gon' come
3 in. And so she took it to Dr. Slayman and
4 Dr. Slayman kept it. A copy wasn't made. What
5 I learned later was ---

6 **MS. POLVI:** And I'm gonna have to object here.
7 She's about to testify about things about which
8 she has no knowledge. She's about to testify
9 about what I learned later, was clearly from
10 someone else. Hearsay.

11 **THE WITNESS:** It's a law.

12 **MS. POLVI:** And this has been a long, long series
13 without any questions for direct examination in
14 terms of testimony.

15 **MR. WINBURN:** She can testify on what she learned
16 later if it's how she learned it but ...

17 **HEARING OFFICER:** She can certainly testify as to
18 what's within her knowledge or what she learned
19 from ---

20 **THE WITNESS:** This experience.

21 **HEARING OFFICER:** This experience or what she
22 learned ...

23 **MR. WINBURN:** I'll be happy to ask a question.

24 A: Well, maybe let me rephrase.

25 Q: Okay.



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0601

1 A: When I submitted the new FMLA form, I received
2 a letter from Deloris, the benefits
3 coordinator, outlining, stating this is what is
4 supposed to happen when a person turns in FMLA.
5 You receive a letter saying you're either
6 approved or not approved. If you're approved,
7 it outlines what that involves, your
8 protections, what you're supposed to do, a
9 follow-up if needed.

10 Q: Again, this letter was -- you received this in
11 2015?

12 A: Yes. After Dr. Slayman left.

13 Q: And in 2013, did you receive any ---

14 A: No.

15 Q: --- any such letter?

16 A: No. And that let me know that when I was out,
17 I was supposed to -- if it was related to the
18 fibromyalgia, I was supposed to code my leave
19 form with a specific code so that that would be
20 in the record. But it -- I didn't know that.
21 So by Deloris not getting that form back to be
22 able to do her job, I believe, you know, my
23 rights there were violated.

24 Q: Look back at your notes. And you're certainly
25 free to reference them. If these --



1 handwritten notes, and I don't know if you've
2 determined yet whether those are your notes.

3 A: They are. That's definitely my handwriting.

4 Q: Okay. Certainly refer to those. But I don't
5 have a lot more other than I wanted you to --
6 strike that. I'll get to that in just a
7 second.

8 Looking at your notes, are there any other
9 specific occasions that you can testify to
10 directly about the way Dr. Slayman treated you
11 or treated others? I think you've testified a
12 fair amount about the security issues. Are
13 there any other issues related to security that
14 you think may help Madam Hearing Officer in her
15 deliberations?

16 A: I think that it's important to point out this
17 comment that I have quotes that she wouldn't
18 give me a copy of the contract. She stated she
19 was holding it close because, in quotes, I am
20 at war with the sheriff.

21 Q: And she said that to you?

22 A: She said that in our -- in a senior staff
23 meeting.

24 Q: Okay.

25 **HEARING OFFICER:** I'm sorry. What contract are we



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0603

1 talking about here?

2 **THE WITNESS:** The security contract. Let's see.

3 Q: And I think below that, you indicate that the
4 contract was not public information. Is that
5 your understanding as to how contracts work in
6 government?

7 A: No. They are -- once a contract is approved,
8 it's public information. And she did not --
9 she just didn't want anybody to see it. She
10 didn't want anyone to know what ...

11 Q: Do you know if Dr. Slayman had any direct
12 relationship with Defender in any way? Did she
13 ever say I know the owner or anything like
14 that?

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

16 Q: Okay. You also mentioned in your notes you
17 became angry with the Rotary Club. Is that
18 something you have direct knowledge to --
19 about?

20 A: Yes. The Rotary Club had invited one of the
21 former SROs to speak, and she became angry
22 about that because, of course, he was promoting
23 having security -- having police deputies in
24 the schools, school resource officers -- as
25 opposed to security officers. And he did talk



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0604

1 about problems. He just made the school look
2 bad. And, of course, that -- ultimately, she's
3 is superintendent. I can understand why she
4 felt like that made her feel bad. But she got
5 angry at the organization because he had
6 someone that said something she disagreed with.

7 Q: You also have a quote, I think, in your notes
8 about Alice in Wonderland. Do you remember
9 what that's about?

10 A: Yes. And that's a -- but she would come in --
11 and Dr. Slayman's a petite person -- and she
12 would scream and she would say that I'll cut
13 off their heads. And, you know, we're all
14 familiar with Alice in Wonderland, and then
15 that's just what -- it's ugly. I admit it.
16 But that's just what she made us think of. I
17 don't know who first said it but, it's what it
18 made me think of.

19 Q: Can you describe -- excuse me -- what this
20 screaming made you feel, or if it made you feel
21 anything, in terms of walking into an office
22 where somebody screams, can you describe that
23 for the hearing officer?

24 A: It's -- she would -- and I'm a screamer. I'm
25 a yeller. I'm -- I believe that in order to



1 for you to hear me, I may need to talk loud
2 because you're obviously not listening. If I
3 talk louder, you'll hear me. And I know that's
4 not -- so -- but she would sit in her office,
5 and so many things would be a crisis. You
6 know, something small would be a crisis for
7 her. And so she would scream, Jeff, Charles,
8 and a high-pitched shrill voice so --
9 obviously, so they could hear her while they
10 would be in their offices, to have them come in
11 there. It wasn't like we might would -- like
12 I do with my children when we were sitting in
13 a room, even if she was upset about something
14 at us, she wasn't, like, screaming at us like
15 that, but it was more of to get their attention
16 to get them in there and, you know, because she
17 had something urgent they needed to take care
18 of or she needed to discuss with them.
19 And that was -- I mean, it wasn't every day,
20 but it was so very frequent that -- I mean, it
21 would be more unusual for it not to happen than
22 for it to happen. But when she, you know, made
23 comments, when she threatened that she would
24 cut Shaw's throat, she didn't scream that at
25 her. She was just very direct.



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0606

1 Q: Were you in the room when she told Shawn
2 Williams that?

3 A: I was.

4 Q: How did that make you feel to witness that?

5 A: That particular meeting was a called meeting of
6 our senior staff the morning after the -- of a
7 board meeting. And it was the first board
8 meeting that Mr. Gardner -- I don't know if it
9 was the first one he attended in his position,
10 but it was the first one that she had to
11 present something. And he and I had worked
12 together on the matter. It was school board
13 has a policy and at a dollar out of every
14 football ticket sale has to be put in a special
15 pot. And in order to spend that money, the
16 board has to agree. And it doesn't matter if
17 it's a dollar or all of it, the board has to
18 approve that.

19 So there's a process, you know. They have to
20 have bids. But the superintendent of
21 operations had to present that. Mr. Gardner
22 had requested it because, in the past, he was
23 a principal. But putting that together was --
24 so he and I did that. And so during his
25 presentation, I had assisted. I said something



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0607

1 to help him along. And I know that Charles
2 King had interjected something and used the
3 words, if I can interject. So that was ...
4 When we're having the meeting and she is going
5 off on us for talking in meetings out of turn,
6 out of order, and talking to the board members,
7 and she's on Shawn because Shawn had said
8 something in the executive session to where she
9 thanked some of the board members for attending
10 her personnel hiring event. I'm sitting here
11 thinking, I helped Jeff -- I thought she was
12 talking to me because I had spoke when I was
13 not asked to do so. And so I'm thinking, well,
14 it's me. I screwed up. She's mad at me. And
15 so as she's saying -- I heard her say that to
16 Shawn, but it didn't resonate or register with
17 me because she wasn't saying it to me. And I'm
18 still thinking she's mad at me. She's over
19 here talking to Shawn.
20 But I mean she said it, and she was very
21 direct. And it was after the meeting when
22 Shawn said -- I mean, she was visibly
23 disturbed. She felt threatened and she said,
24 she just threatened me. And Shawn went back in
25 and spoke to her.



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0608

1 There were times later, and just a couple, that
2 we would be doing something and she used that
3 term sometime -- I'll cut their throat. And
4 she said, Shawn told me I can't say that
5 anymore.

6 Q: Did Dr. Slayman ever threaten you with your
7 job?

8 A: Yes.

9 Q: Will you describe that scenario, if you
10 remember it?

11 A: Well, she let us know, of course, in that
12 meeting, if we ever spoke to a board member,
13 she -- I don't know if she said she'd fire us.
14 I mean, but it was very clear of the
15 implication. You cannot speak to a board
16 member. And -- period.

17 Q: Is that not a function of the executive
18 director of finance to communicate with the
19 board at some level?

20 A: Some level, obviously I would present to the
21 board. There would be times they might
22 recall -- it -- actually in my position, I
23 preferred not to. I tried to my best to have
24 everything funneled through Dr. Slayman because
25 you never know when one is wanting something



1 against another, what their intentions might
2 be, so I was actually comfortable going --
3 having it all flow through Dr. Slayman. But it
4 wasn't that sense of don't talk to them about
5 work. It's don't talk to them about anything.
6 And I'm from Chester. I've lived there all my
7 life, and I know some of them on a personal
8 level. Dr. Rick Hughes was my son's -- oldest
9 son's baseball coach.

10 I'm a -- I cry easily, okay, when I talk about
11 my family. But my youngest son -- I mean, my
12 oldest son had had -- we discovered when he was
13 in the ninth grade, was born with something
14 called ... Wilkinson's-Parkinson's-White ... [sic]
15 Syndrome, which is your -- and it's a defect of
16 the heart, and you're born with an extra fiber
17 in your heart. And this is something that can
18 cause sudden death. And he was a very athletic
19 boy, very good health, very good shape. One
20 morning he comes down and says, I don't feel so
21 good. My heart hurts. My chest hurts, and my
22 heart's beating really, really fast. And he
23 had a -- normally because of the condition,
24 physical condition, he was -- had a low pulse
25 rate. Well, me being the mama I am, said,



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1 honey, it's probably gas. Go upstairs and
2 ready to go to school.
3 When he came back downstairs, my husband
4 said -- he would go to the doctor at the drop
5 of a hat. He said, you feeling all right? He
6 said, well, my chest feels better, but my
7 heart's still beating really fast. And I said
8 do you want to go to the doctor. He said sure.
9 They went to the doctor. My husband called me
10 a little bit later and he said, Sam told me to
11 tell you not to worry. I'm not the worrier, so
12 I knew something was wrong. And I researched
13 it and find this out. They had already
14 scheduled him -- that was Monday -- on
15 Wednesday to go to a pediatric cardiologist.
16 I didn't tell my son what it meant. Our family
17 doctor said sit down; don't move. He doesn't
18 need to move. Don't go to school. Don't do
19 anything until you see a doctor.
20 So we go in and see the doctor, and my son was
21 tall for his age and he -- doctor examined him
22 and he told him what it was and told him it's
23 caused instant death. And he said, well, you
24 can fix it? He said we won't -- we don't know
25 if this is the specific kind that can cause



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0611

1 instant death, but the procedure to fix it goes
2 through the same process to know. So we can
3 fix it. You'll be fine. Never even have to
4 report you had a heart problem. We left
5 there ---

6 **MS. POLVI:** And do have the interject. Of course,
7 your son's health is important, but it's not
8 relevant to the claims here ---

9 **THE WITNESS:** It's getting to my relationship with
10 Dr. Hughes and the ---

11 **HEARING OFFICER:** Go, go.

12 A: So we leave there, and the doctor said he's in
13 no more risk than he was today then he was
14 yesterday. Leave. So I took him home. We got
15 his practice uniform. This was February, so
16 this was before baseball season starts. Got
17 his equipment and I took him to ball field.
18 And at that time, Rick Hughes was the high
19 school baseball coach. So I let my son out.
20 As he's dragging his ball bag behind to the
21 ball field, and Dr. Hughes came to the car and
22 he said, Anna, WPW -- the boys were talking,
23 and it sounds like it's WPW. I said, yes, sir,
24 that's what it is. He was what are they gon'
25 do about it? And I said, well, they're gonna



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0612

1 fix it. They're -- he's like great. When are
2 they gonna do that? And we're gon' do it on
3 spring break. We're gonna wait 'til spring
4 break. And he said, well, that's great because
5 Maverick, the normal catcher, was wrestling and
6 I need a catcher.
7 So I left him knowing he was in better hands
8 there than with me. And after that point, he
9 was actually the emergency contact for my son.
10 So that's my relationship with this man. And
11 now this woman tells me I can't speak to him.
12 It was those kind of things that hurt. Is
13 there tissue?

14 **MS. MOORE:** I'll take care of that.

15 **Q:** I just have a couple other questions, and I'll
16 be done and you could answer any questions that
17 Ms. Polvi and Dr. Slayman may have of you.
18 Just looking again at your notes, two more
19 questions, I guess. This looks like it's on
20 the fourth page of the notes that -- these are
21 the handwritten notes.

22 **A:** Uh-huh.

23 **Q:** The bullet at the top. Told principals they
24 would have -- I'm sorry -- they would all
25 receive an officer. Do you remember writing



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0613

1 that?

2 A: Yes.

3 Q: All right. The next one is: Told board
4 security personnel could carry guns and arrest.

5 A: Uh-huh.

6 Q: Is that true?

7 A: It is not true.

8 Q: So the Defender SSOs could not carry guns or
9 arrest?

10 A: No. They did not have the legal -- the
11 authority granted by the law to arrest someone.

12 Q: The next bullet is refuse to allow access to
13 cameras. What do you -- what does that mean?

14 A: Security cameras been installed in all the
15 buildings, and she would not allow -- and there
16 had been cameras in the buildings before this,
17 older outdated cameras, so our systems were
18 outdated. And she would not allow the officers
19 access to be able to view the cameras.

20 Q: Okay. And then the next one is: Refused to
21 allow sheriff's department to provide
22 active-shooter and other safety training,
23 \$6,000. What do you mean by that?

24 A: I'm not sure about the \$6,000. But the sheriff
25 had -- has extensive training on active-shooter



1 situations. He had offered to come into our
2 schools and do that. And, I mean, Dr. Slayman
3 just wouldn't work with him to do it.

4 Q: I'd like to enter Exhibit 12 -- Exhibit 11 into
5 evidence. These are your notes; is that
6 correct?

7 A: Yes.

8 **HEARING OFFICER:** Any objection?

9 **MS. POLVI:** She's testified they're her notes?

10 **THE WITNESS:** Yes.

11 **MS. POLVI:** No objection.

12 **HEARING OFFICER:** Okay. Petitioner's Exhibit 11 is
13 admitted.

14 **(Petitioner's Exhibit Number 11 was admitted into
15 evidence.)**

16 **MR. WINBURN:** No further questions, Ms. Pike.

17 **HEARING OFFICER:** Okay. Ms. Polvi?

18 **MS. POLVI:** Thank you.

19 **MS. STROUD - CROSS-EXAMINATION BY MS. POLVI:**

20 Q: Mrs. Stroud, I'll be asking you some questions
21 to follow up on your testimony and things
22 relevant to this case.

23 A: May I ask your name again? I ---

24 Q: Sure. My name is Shannon Polvi.

25 A: Okay.



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0615

1 Q: I'm an attorney at Cromer, Babb, Porter &
2 Hicks. I represent Dr. Slayman.
3 So let's start with discussion about the
4 testimony that you gave about your FMLA. First
5 and foremost, I know -- I want -- I want to
6 note that fibromyalgia is a difficult
7 disability to have. And I believe in your
8 testimony -- and I wrote it down as a quote --
9 is that you acknowledged that you were gone
10 more days than not during a time period,
11 correct?

12 A: No. I said I was late more days than not, not
13 gone.

14 Q: -- And you were gone, I believe that you also
15 testified, at least once or more every other
16 week?

17 A: Yes.

18 Q: And are you aware of FMLA guaranteeing an
19 employee up to 12 weeks' coverage during a
20 given year?

21 A: Yes. That actually occurred prior to me filing
22 the form. Because I was not aware what was
23 wrong with me, so I was out. I did mention
24 that after I learned what was wrong with me and
25 began to take some medication, I wasn't out



1 that long -- that much. I was still late
2 because, as in the order that the doctor
3 provided, he had indicated that that was an
4 issue. It's very difficult to get out of bed
5 in the morning.

6 Q: And Dr. Slayman never told you that you
7 couldn't sleep in late or take the necessary
8 care that you needed, did she?

9 A: She told me I could not be late and that if I
10 was I was going to be one minute late, I had to
11 call her. She let me know that that was a
12 problem.

13 Q: And on that very note, is that Dr. Slayman
14 didn't write you up when you just didn't show
15 up to work; isn't that accurate?

16 A: I didn't not just show up to work. I would
17 call -- I never didn't not just show up. I
18 would call her. Either leave a message on her
19 phone if she didn't answer or speak with her
20 personally. We did, at that point, begin -- we
21 could e-mail, so I did contact her whenever I
22 was not gonna be at work or had already had
23 preapproved leave.

24 Q: And there were times that Dr. Slayman informed
25 you that you hadn't given her notice when you



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0617

1 arrived late; isn't that accurate?

2 A: And that's when she told me I had to let her
3 know. So once she told me ---

4 Q: But prior to that there were times ---

5 A: Yes.

6 Q: --- that you showed up late to work and you
7 didn't notify your supervisor?

8 A: Until -- yes, that would be accurate.

9 Q: And Dr. Slayman did not write you up?

10 A: No, she didn't.

11 Q: Dr. Slayman never wrote you up for a single
12 attendance issue throughout the entire time
13 that she was your superintendent; isn't that
14 correct?

15 A: She also never wrote up a good evaluation. So
16 she never gave me any performance evaluation,
17 good, bad, indifferent, in writing.

18 Q: So to follow up, Dr. Slayman didn't write you
19 up a single time ---

20 A: No.

21 Q: --- for any attendance concerns?

22 A: No.

23 Q: Now, you're aware for an FMLA violation to have
24 happened, she would have had to take some
25 action against you?



1 A: She took action by not -- she didn't take
2 action in writing.

3 Q: You continued to be employed, did you not?

4 A: I did.

5 Q: And you continued to have your job after
6 Dr. Slayman, did you not?

7 A: For a short period of time.

8 Q: And with regard to your FMLA, Dr. Slayman was
9 never given any FMLA paperwork by you; isn't
10 that correct?

11 A: That's not the protocol.

12 Q: And exactly. You gave -- you were working with
13 the HR department and Ms. Deloris -- what's her
14 last name?

15 A: Jackson.

16 Q: Jackson and Shawn Williams in HR, correct?

17 A: With -- I guess I did ask Shawn about it. And
18 she did tell me I needed to get the form. But
19 I was primarily working with Deloris who -- I
20 mean, that was the process.

21 Q: So the responsibility for FMLA lies with the
22 benefits coordinator and the HR director?

23 A: Absolutely.

24 Q: And you didn't do a complaint against the
25 benefits coordinator, did you?



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1 A: I didn't have a complaint with the benefits
2 coordinator.

3 Q: And you didn't do a complaint with regard to
4 the HR director, did you?

5 A: I didn't have a complaint with her about it.

6 Q: So the people who were responsible for FMLA you
7 didn't complain about. But yet when
8 Dr. Slayman, who didn't write you up, didn't
9 reprimand you, continued to employ you, and
10 wasn't responsible for FMLA, somehow she's
11 attributable for violating your FMLA rights?

12 A: My complaint is that she took the form and
13 destroyed it.

14 Q: And what knowledge do you have to base that?
15 Did you ever see Dr. Slayman even hold any FMLA
16 paperwork from you?

17 A: No. But I have no reason to doubt Shawn when
18 she says that Dr. Slayman kept it.

19 Q: And but you have no personal knowledge to back
20 up that accusation?

21 A: No, no.

22 Q: And your document makes it clear that you don't
23 like Dr. Slayman; that's accurate, right?

24 A: I don't like the way Dr. Slayman behaved
25 towards us. I don't like the way that she



1 risked the safety and security of the children
2 of Chester. I -- actually, I think
3 Dr. Slayman, again, when she first came, she
4 did some phenomenal things. She -- some of the
5 ideas she came up with would shock me. I asked
6 her more than once, do you sleep at night? How
7 do you come up with this stuff? I mean, I have
8 a lot of praise for what -- she moved Chester's
9 children along.

10 Q: But yet you called Dr. Slayman a lot of names
11 in your statement, didn't you?

12 A: I did.

13 Q: You called her selfish?

14 A: Yes.

15 Q: Vindictive, cruel, a bully, paranoid: Those
16 are all things that you allege Dr. Slayman to
17 be?

18 A: I stand by that 100 percent, yes, ma'am.

19 Q: In your statement, you accuse Dr. Slayman as
20 having chosen her membership and breakfast club
21 with her political advisors over doing what is
22 best for the children in the district. Did you
23 ever go to Dr. Slayman, about any such
24 concerns ---

25 A: Yes, ma'am.



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1 Q: --- prior to filing a hostile work environment
2 complaint about her?

3 A: Yes, ma'am.

4 Q: And when did you do that?

5 A: At -- when we would meet in our senior staff
6 meetings and she would talk about them, we
7 would advise her, and I would say to her, you
8 can't trust these people. The first time --
9 before she ever went to meet with them the
10 first time, she told me she had been invited by
11 some men to go to this breakfast. And she
12 didn't want to go. And I actually said go.
13 What harm can it be? You had breakfast.

14 Q: And Chester's a small community, I think, as
15 you testified, right?

16 A: Right. I mean, you know.

17 Q: Community leaders such as the fire chief and
18 the head of the largest philanthropy, that
19 would benefit the school district to be
20 involved with those types of leaders in the
21 community, wouldn't it?

22 A: Who's -- I'm not sure who the head of the --
23 who you're referring to. I know who the fire
24 chief is.

25 Q: I believe Mr. Bundy. He's one of my ---



1 DR. SLAYMAN: Tinker.

2 Q: Tinker. Excuse me. Wrong name.

3 A: He wasn't the head of a philanthropy.
4 Mr. Tinker, who I've also known for a number of
5 years, was a greeter at my wedding reception.
6 Is -- the coroner, obviously respected by the
7 people that elected him to do that job.

8 Q: So what's wrong with the superintendent of a
9 school district meeting with those types of
10 leaders in the community?

11 A: Absolutely nothing.

12 Q: So let's talk about ---

13 A: Actually, as I said, I said go. I didn't have
14 no reason to think in the beginning she
15 shouldn't go.

16 Q: Let's talk about personal motives for
17 potentially making these accusations against
18 Dr. Slayman. I think you have already
19 testified that your husband was a school
20 resource officer in the district, right?

21 A: Correct.

22 Q: Works with the sheriff's office?

23 A: Correct.

24 Q: And that your -- you and your husband were
25 angry when the board and Dr. Slayman proposed



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1 to have the privatization of the school
2 security, weren't you?

3 A: I was not angry. I think I said I was
4 concerned for my child's safety.

5 Q: But if your household income of both you and
6 your husband's relied on things that related to
7 the school district, didn't they?

8 A: I think I had mentioned this for clarification
9 before that all began that my husband had not
10 been a school resource officer for a year prior
11 to this occurring. So, no, our household
12 income did not rely on that.

13 Q: Your husband also was employed to work
14 after-school events, was he not, up 'till that
15 time period?

16 A: He had, as a school resource officer, after he
17 became the -- after he was over security at the
18 courthouse. He may have worked a few games.
19 He -- my husband's getting older. Didn't like
20 standing on his feet. It's hot standing out at
21 most football games and stuff. He -- we didn't
22 need the money, and he didn't want to do it
23 anymore.

24 Q: But that changed from the sheriff's office to
25 Defender meant that your husband would no



1 longer be able to work at though events at the
2 school?

3 A: No, ma'am. The security officers hired by
4 Defender are not -- they don't meet the
5 requirements of the high school league, so they
6 cannot provide the security. It has to be a
7 uniformed officer. So the officers continue to
8 provide security at the football games. So,
9 no, that was not an impact to any money. He
10 could have still done it had he wanted to.

11 Q: Several pages of your statement indicate that
12 you have very strong opinions, including
13 exclamation points about the security being
14 changed to Defender; that's accurate, isn't it?

15 A: Absolutely. As I said, it was a security risk.
16 I had a child in the school. I was very
17 concerned about his safety.

18 Q: And you blamed that change to Defender on
19 Dr. Slayman, don't you?

20 A: It was her initiative.

21 Q: Were you ever in any of the executive sessions
22 where the board, the Chester County School
23 Board even discussed this being voted on?

24 A: No. Never.

25 Q: Yet when we looked at your statement, you



1 referenced and accurately only discussions that
2 occurred in executive session.

3 A: Could you give me ---

4 Q: How would you have known about that?

5 A: Could you give me an example of one of those?

6 Q: You talk about the negotiations about what the
7 terms of the different contract would be.
8 There are several points where you talk about
9 the security firm and what those business
10 aspects would be changed?

11 A: I was on her staff. She would provide that
12 information to us in meetings. I mean, I had
13 to know the cost. I was on -- at -- that was
14 part of what we did, discuss contracts. So I
15 would know the information about a contract,
16 not necessarily what the board said about it or
17 what they did. That's two completely separate
18 things.

19 Q: And Rick Hughes was on the school board at that
20 time, right?

21 A: Yes.

22 Q: And you already testified ---

23 A: As someone I can't talk -- couldn't talk to.

24 Q: --- that you considered him to be very close,
25 so close that you made him an emergency contact



1 for your son?

2 A: Yes.

3 Q: And you spoke closely with him throughout this
4 time period?

5 A: No, ma'am, I did not.

6 Q: So an emergency contact for your son isn't
7 someone you keep in close contact with?

8 A: This was my older son, who was no longer in
9 school. He's nine years older than the child
10 that was in school. So he was, at that time,
11 either in Indiana or Nashville, Tennessee. So
12 Dr. Hughes would be the emergency contact at
13 that point. I mean, he was grown. I didn't
14 list -- it was no longer my responsibility to
15 list an emergency contact for him. The son
16 that was in school was not the same son.

17 Q: Rick Hughes was also your personal physician?

18 A: No, ma'am.

19 Q: He, along with Sam Stone, were seeing you on --
20 for physical reasons?

21 A: No, ma'am.

22 Q: I think you already testified to that effect
23 earlier about you referred to he and Sam about
24 medical contacts?

25 A: He was the contact, and he was my son's



1 baseball coach, and my son's emergency contact.

2 Q: And you never sought his care for physical care
3 of yourself?

4 A: No. I would like to, though, mention to you
5 that on the night that the board voted not to
6 rehire any former superintendents, earlier that
7 day, Dr. Hughes had seen me smoking. I pulled
8 up beside him smoking. As I'm blowing a big
9 puff of smoke out my window, whenever
10 Dr. Hughes, throughout our -- my life when he
11 saw me, and if he saw me smoking, he would say
12 something about that. So I'm thinking, great.
13 After that meeting, Dr. Hughes came to me and
14 he said, you need to quit smoking because it's
15 bad for fibromyalgia. I'd never had that
16 conversation with him. I never told him.
17 Never had the opportunity to see him to have
18 that conversation. And I said, how do you know
19 that? And she said she told me. That's how I
20 know. That's the only time I discussed my
21 health with him, and that was as brief as that
22 because then he walked out. Other than when he
23 would tell me throughout the years when he'd
24 see me smoking, I needed to quit. And he knew
25 that ---



1 Q: And that's the same day that Rick Hughes voted
2 to not allow Dr. Slayman to be able to reply
3 for her job; isn't that correct?

4 A: He made a motion. The vote was -- the motion
5 was not to allow any former superintendents,
6 not to hire any former superintendents, which
7 would include Dr. Slayman. That was the vote
8 that was passed by the majority of the board.

9 Q: And you were aware that Rick Hughes initiated
10 that vote in order to prevent Dr. Slayman from
11 being able to return to her job?

12 A: I would believe that was his intentions. I
13 don't know that for a fact. But I believe
14 that's his intention.

15 Q: You testified earlier that you wanted to get
16 the contract with Defender while it was being
17 negotiated from Dr. Slayman; is that right?

18 A: Not while it was being negotiated. It was my
19 understanding it was, in fact, the contract
20 because they were already -- I mean, they'd
21 already hired the liaison. They had already
22 advertised for positions. Defender had already
23 hired -- advertised a hiring individual. They
24 had already had a meeting with the community
25 where they brought in people that were



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1 supposedly gonna be the school resource -- I
2 mean, the security officers. So at that point,
3 because normally when you have a contract with
4 someone, you're going to have to pay them. So
5 I knew that in order for us to pay them,
6 following board policy, I needed to get a
7 purchase order in, and therefore I needed an
8 amount. And so I asked -- and it wasn't during
9 the negotiation process. I was asking for it
10 after it was in my -- to my belief, done so
11 that I could do what needed to be done to
12 follow the rules that we needed to -- what we
13 were required to do.

14 Q: You're aware that the Chester County School
15 Board instructed that no one was to receive a
16 contract while it was being negotiated?

17 A: I did not ask for it while it was being
18 negotiated. I think you're misunderstanding.
19 I needed it after that. I don't ask for them
20 while they're be -- any contract while they're
21 being negotiated. I think that that -- during
22 the negotiation process, that is executive --
23 it's not public information. I don't need
24 them. No one needs them other than the people
25 that are making those decisions on any



1 contract. So, again, I wasn't asking for one
2 during negotiations. And I don't know what the
3 board said, but I wouldn't be surprised that
4 they wanted no one else to have it. I'm not --
5 that wouldn't surprise me.

6 Q: You're aware of the release of the contract
7 would be a safety concern because it detailed
8 training, the placement of where security
9 officers would be, and the procedures that they
10 could and couldn't do? You're aware of that,
11 right?

12 A: No. 'Cause I -- one, I didn't get -- that's
13 not what I would have been looking for. Giving
14 it to me is not releasing it. I'm -- part of
15 my job is to maintain the confidentiality of
16 security. Part of my job at that time was --
17 I'm not there -- to maintain and safeguard the
18 documents. It's not like I hand stuff out
19 willy-nilly.

20 Q: You were actively involved in trying to prevent
21 the district from changing school security from
22 the sheriff's office to Defender; isn't that
23 right?

24 A: No, ma'am. I mean, when you say active, we had
25 the discussions with her. And I had told her



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1 what I thought would be best would be a blend,
2 put in the elementary schools -- have the
3 security officers; middle and high schools
4 continue to work with the sheriff and have
5 security -- school resource officers.

6 I did not -- I did actually sit in a meeting --
7 at one meeting with Dr. Slayman. And I don't
8 know, whoever it was over Defender, it was some
9 discussions -- it was at that time I -- I was
10 the one that made them aware that since they
11 were hiring Mr. Williams, who was a police
12 chief, that once he ceased being a police
13 chief, he would not be allowed in the state to
14 carry the firearm. Had to get special
15 permission to do that.

16 My job was to advise Dr. Slayman, whether I
17 agreed with what she was doing or not. And
18 this is with any superintendent. It was my
19 practice. Once I left out of there, my job was
20 to support the superintendent and not go
21 attacking her and working against her.

22 Q: Well, let's pause there. So is this statement
23 where you call your supervisor selfish,
24 vindictive, cruel, bully, and doesn't have the
25 best interest of the district, doing exactly



1 the opposite of what you just testified to?

2 A: Yes. Because this was requested so that we
3 could provide information to a person
4 investigating the hostile workplace that my
5 supervisor had subjected us to.

6 Q: Supervisor who never wrote you up for any
7 attendance issue that you had?

8 A: There are so many other ways to harm a person
9 without putting it in writing.

10 Q: You continued to have an employment record
11 without her taking any action against your
12 employment?

13 A: She didn't, the best of my knowledge, put
14 anything in my file. I do have a copy of my
15 personnel file up until the time she left. I
16 do not recall. Oh, there was the one little
17 issue where there was a sexual -- I complained,
18 made a sexual harassment complaint not -- it
19 was a power sexual harassment complaint. But
20 she investigated that and determined that I had
21 lied. And so that is in my file. That would
22 be negative. But it was the way that she did
23 other things.

24 Q: And let's talk about that. I would like to
25 follow up on that.



1 A: --- she did other things. To if you will up on
2 that. Other things.

3 Q: And so you brought an accusation against a
4 accounting firm, isn't that right, an
5 individual of an auditing firm?

6 A: I did.

7 Q: And that's the same auditing firm that had just
8 recommended changes because of your performance
9 in your job?

10 A: They had recommended changes. Not because of
11 the performance of my job, but they had
12 recommended changes.

13 Q: And they had audited you, and you didn't like
14 being audited, did you?

15 A: Actually, I enjoyed being audited. It's
16 something -- as I mentioned, I worked for the
17 City, the county, and then the district. Every
18 one of those years, I went through an audit
19 process. It is actually something that -- I
20 found it a challenge because each year I wanted
21 my audits to be better and better, and there
22 would be fewer and fewer things I would learn
23 from the auditors. No. I had a very good
24 working relationship with that audit form. And
25 had for -- they had been our auditors for all



1 of the years that I had worked for the
2 district. And I would -- in my opinion,
3 they're -- are the best in auditing school
4 districts. So, no, I had a great working
5 relationship with them. I don't -- going
6 through an audit, we do it every year. But
7 it's tedious. It's aggravating. They never
8 pick the best time to come. They -- there's
9 that aggravation with it. But, no, I've never
10 been a -- never been a problem with being
11 audited. I had no reason to -- nothing to fear
12 from it. They're just people. People get
13 nervous when they come. Oh, the auditors are
14 here.

15 Q: And that audit indicated that changes needed to
16 be made under your leadership?

17 A: The ---

18 Q: It's a yes-or-no question, and then you can
19 provide an explanation.

20 A: Yes. Now may I provide the explanation?

21 **MR. WINBURN:** Yes.

22 **THE WITNESS:** Thank you.

23 A: The -- let's just go into the whole thing. The
24 gentleman that was the lead -- well, the
25 partner that oversaw the audit that reviewed



1 the work of the other auditors that came and
2 did the work, he was actually a partner in the
3 firm. He started doing our audits, I believe,
4 the same year that Dr. Slayman came. They had
5 a great rapport immediately. They were born in
6 Texas, I believe. Great rapport. And he --
7 he's a very hyper, energetic man. He
8 wouldn't -- and he would probably maybe spend
9 a day during the audit process in our building.
10 The rest of the time -- and this was not --
11 they would review the work in their office.
12 When they would come, they would generally take
13 the time to meet with me to discuss issues
14 maybe questions or that sort of thing ---

15 **MS. POLVI:** I'm gonna say, an explanation is fair,
16 but this doesn't need to be a whole history of
17 this if ---

18 **MR. WINBURN:** I'm sorry.

19 **HEARING OFFICER:** You've opened ---

20 **MR. WINBURN:** You opened the door.

21 **HEARING OFFICER:** You did open the door, and I'm
22 gon' let her explain it.

23 **MR. WINBURN:** I'm sorry for that.

24 **THE WITNESS:** Thank you.

25 **A:** This individual wouldn't ever take the time to



1 sit down and talk with me. He would, however,
2 ask me if I would want to go to lunch. And I
3 didn't -- for a couple of reasons. One,
4 normally I don't eat lunch. It's just not a
5 thing I do. The main reason, I didn't want to
6 go to lunch with a man in our small community
7 because people in our community see a woman
8 with a man and there's that. There's gossip.
9 I don't need that in my life. It's not good
10 for the district. We need -- I don't think
11 that we should discuss the district's business
12 at any of the restaurants we have in Chester
13 because there are other people out there
14 listening. That's just not appropriate. That
15 should be discussed in our office.

16 Typically, after the audit would be completed,
17 the work would be completed, the partner would
18 sit with me. We'd go over any concerns they
19 had, anything I might need to clarify that may
20 not have been clear. A lot of times the guys
21 reviewing our work, men, women, they may have
22 been -- might be fresh out of college and they
23 think they've found something but may not have.
24 So we would discuss that.

25 And as far as management letter, which it --



1 would be recommendations that they have, and it
2 is very unusual to not have a management letter
3 with your audit. But it would be this is what
4 we got, and you would work out a plan, how to
5 resolve any issues, concerns they have to
6 improve that, customarily. This gentleman
7 would not do that. He wouldn't sit with me and
8 talk about those things. Once they would be --
9 all that was done, then there would be a
10 meeting with the superintendent, board chair,
11 the auditor, and myself, and we would discuss
12 the audit and go over the audit. And I have
13 their PowerPoint so what's gon' be presented at
14 the meeting. And we would discuss those
15 issues.

16 At this -- for this particular audit, as usual,
17 the gentleman had asked -- can -- whenever I --
18 when they would be in our building, they would
19 need information or they would ask questions.
20 There would be times I would have to go into
21 the room where they auditors were and speak
22 with them. Whenever that -- I would do that
23 and he was there, he would immediately get on
24 his phone, start talking, walk out of the room,
25 and be gone. He would not have conversation



1 with me. But then he would say things -- well,
2 let's go to lunch or let's go -- dinner.
3 And so this particular day that they were to
4 present that audit, which would have been the
5 '13-'14 audit, he -- when the gentlemen -- they
6 came -- and we have an alternative school.
7 They also do that audit. It has to be -- their
8 audit has to be complete because it's part of
9 our audit. And so they met with them first,
10 and then they came to meet with us. They
11 didn't -- for whatever reason, there wasn't any
12 time for us to sit down and talk about the
13 management letter. And part of the management
14 letter, I -- there are findings which are
15 really, really bad, a management letter or
16 recommendations. And then there's -- there was
17 this spreadsheet that they give us that would
18 have things that they had seen that they might
19 have concerns about.
20 One of those issues was they had gone out to
21 the schools and done an audit that -- normally
22 they would come to me and they say pick three
23 schools, any three schools. So if I had a
24 concern about a school, that would be one
25 school. It was just willy-nilly pick -- here,



1 one, two, three or they'd go do them.
2 So the three schools that they went to, they
3 found some issues where bookkeepers had not
4 made deposits on a daily basis, where teachers
5 had held money and not given it to the
6 bookkeeper on a daily basis. Nothing that
7 appeared to be any theft or fraud or anything
8 like that, but things that could be. Money
9 being held in the teacher's classroom could get
10 lost; somebody could steal it. I mean, not
11 that that person would do it. Anything can
12 happen.
13 So those things were on there. And they had
14 e-mailed that to me that day. So I had taken
15 their -- I -- it was a PDF, so I couldn't write
16 on it. So I made little text boxes, and I did
17 mine in red because theirs was in black. So
18 there would be a contrast so they can see it.
19 Printed that out, and it that available for
20 them and the board chair and the superintendent
21 as we're going through that.
22 Well, this was at the same time that Dr. Knox
23 had said I was overstepping my bounds by trying
24 to consolidate the schools, yet they're
25 pointing this out. During that meeting -- the



1 gentleman's name is Kevin Matt [ph]. And he
2 that -- he was Dr. Slayman or Mrs. James, one
3 asked him, well, do we have to consolidate the
4 schools? Do we have to do that? No, we don't
5 have to do that. Well, I've been telling them
6 the firm says so. And I've got that documented
7 in writing. No. We've -- I've never said
8 that.
9 So now I've lied to them, obviously, because he
10 has said it. He's an auditor, and I don't have
11 in front of me the paperwork showing it, but
12 I've got it in a file down the hall. So he
13 says that, and then he says that the reason
14 these things had occurred was because I didn't
15 get out there and do our evaluation -- or
16 little audits of the schools. That particular
17 year, we were implementing new software. We
18 had gone out in the fall. We were implementing
19 in the spring, so we were working with the
20 bookkeepers there. We did not. And the
21 auditors were coming in. So he's saying that
22 it's my fault for not going out there that this
23 has occurred. And he kept saying things to the
24 point I honestly felt like he was working
25 the -- Dr. Slayman, who she and Mrs. James,



1 were here -- were almost into a frenzy.
2 And they're in a sidebar conversation. I'm
3 sitting beside Mrs. James, Keith Campbell, who
4 had been the lead person working on our audit
5 and had been for years was across from me. And
6 then Kevin's sitting diagonally across from me.
7 And as they're having their little
8 conversations with him commenting, and I'm sure
9 it's like, see -- she's doing this whatever
10 (demonstrating). I don't know. He looked at
11 me and he looked at his notes and he said
12 (mouthing nonverbally) ...

13 **COURT REPORTER:** Excuse me. Could you ...

14 **HEARING OFFICER:** Yeah. What did he say?

15 **THE WITNESS:** I'm gon' say, because this is what he
16 did (demonstrating). My mouth's dry.

17 Q: So you have to say it out loud for our court
18 reporter.

19 A: I'm going to. But I'm just for ---

20 **HEARING OFFICER:** Yes.

21 **THE WITNESS:** --- emphasis here saying this is what
22 he said so that no one else would -- see, you
23 should have had lunch with me. But he didn't
24 say it. He mouthed it (demonstrating). So and
25 I'm gon' tell you that there is no -- I don't



1 feel like the man wanted anything sexual from
2 me. I figured that he wanted to lord his
3 power -- lord his power over me.

4 After the meeting was over, we walked into my
5 office and we -- well, you just -- you may have
6 cost me my job. You didn't discuss any of this
7 with me. I have on record this -- I'm upset
8 with him. And he says -- because Monday he was
9 to present the audit to the board. He says,
10 calm down. It's -- now, we've got to go. I'll
11 come early Monday. We'll go to dinner before
12 then, before the board meeting. I don't need
13 to go to dinner to discuss this work. And he
14 said, I do.

15 So the next day, I had a -- our consortium
16 had -- would -- finance directors would meet.
17 And I went to -- I had a meeting in
18 Chesterfield. I discussed this with the other
19 finances people there. And one of the other
20 ladies there told me that she had had a problem
21 with Kevin and that she called Larry. Larry
22 Finney who -- the firm is Greene Finney &
23 Horton.

24 And I called Larry when I left there, and I
25 talked on the phone with Larry from



1 Chesterfield to the entrance of Louisville High
2 School. And I don't have a clue how long or
3 far that is, but it's a long way. And I just
4 told him how he had behaved and how he said and
5 I just said -- I said I'm -- said can you just
6 come Monday. I said, I'm not sure what's going
7 on. Can -- I don't -- I said, I'm not asking
8 not to work with him, but can you -- he said,
9 well, that's possible. And I'm like, well, I
10 didn't know that, but if it's possible then can
11 you just -- can we not -- I mean, I didn't know
12 what was going on, and I'm trying to get to
13 your point.

14 **MS. POLVI:** That's -- Ms. Pike, this is -- could be
15 an extremely lengthy answer, and I think we've
16 all given some leeway on this. But this is a
17 cross-examination ---

18 A: It's getting to the next ---

19 **HEARING OFFICER:** All right. Let her finish.

20 A: So Larry says -- this is Friday. And he says,
21 I don't think I can be there Monday. Just let
22 me think about it. So on Monday at the board
23 meeting Mr. Madden and Keith Campbell were
24 there at the meeting, and they presented the
25 audit. And it was a good audit. I've always



1 had very good audits, and I was happy with it.
2 And the board chair thanked them and asked if
3 they would stay for executive session.
4 Now, that was very unusual. Had never happened
5 before, and they're gonna -- the auditor's in
6 there, and I wasn't invited. So I knew
7 something was up at that point. I'm, you know,
8 very perceptive. So they go in, whatever and
9 they leave. I don't see them afterwards.
10 Well, the next day, I received an e-mail from
11 Larry Finney that explained to me he had, you
12 know, appreciated me calling, understood my
13 concerns. He had talked with Kevin and Keith,
14 and he felt that, because Kevin's a partner,
15 that he needed to talk with -- go to the
16 superintendent.
17 So he had contacted the superintendent Monday,
18 and, you know, he just reminded me that his
19 relationship is with the board and that he felt
20 that that was what he had to do. I replied and
21 thanked him for letting me know and apologized
22 if I put him in any type of situation that he
23 felt inappropriate. Never my intention. And
24 then I received, I believe, an e-mail from
25 Dr. Slayman requesting to come in for a meeting

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1 with her and Shawn at some point. But it was
2 still in the morning, I believe. And in that
3 meeting, she brought this up, that I had
4 done -- was very angry that I had gone and --
5 above her head, around her to do this. And I
6 was trying to explain this to her. And I said,
7 I said the man is harassing me. And she
8 stopped at that point and she said, if
9 that's -- you feel like, you feel like you're
10 being -- you need to document that. You go;
11 you write this up; and we'll deal with that
12 from that point.

13 So thank God, you know. So I go and I wrote up
14 what had occurred, what was going on, the
15 things that were happening. And I gave that to
16 her. And she told me that it would involve --
17 she'd have to contact the firm. She'd have the
18 contact our attorneys and -- fine, police. And
19 so she did. I -- I know that she had a meeting
20 with our attorneys and Larry Finney and Kevin
21 Madden. I'm assuming the HR -- that Shawn was
22 in there. I don't know. Then I received a
23 letter, and that letter explained to me that I
24 had lied -- that she had investigated it, that
25 I had lied, and that Kevin would continue to



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1 audit the district's books, and that I needed
2 to understand the potential impact of my lies
3 and how damaging that could be to someone, that
4 I would not be alone in the room with
5 Mr. Madden, and that he would not be the -- I
6 would not contact or communicate with him, that
7 he would then communicate with Greg McDowell
8 [ph], was my senior accountant instead. And
9 that was how we were going to protect
10 Mr. Madden from me, I assume. But that is how
11 that all played out.

12 **HEARING OFFICER:** Okay.

13 A: And I believe I -- and this is hearsay, but I
14 think I can say that it's my understanding she
15 said I was -- filed that complaint to protect
16 my job. But I truly felt like the man was
17 trying to hurt me. I don't know why he wanted
18 to go out to eat with me. Again, I know that
19 he was not sexually attracted to me. It wasn't
20 that. I never understood that other than he
21 just lorded his power over me to be able to say
22 you're gonna do this, little woman. And I
23 never understood that. He's no longer with the
24 firm.

25 Q: You only reported your allegations of



1 harassment after the audit firm had addressed
2 concerns about matters under your supervision;
3 isn't that true?

4 A: Are you saying that's why I did it?

5 Q: I'm asking you if your report of harassment
6 occurred after the audit had already been
7 published?

8 A: No. It had not been published.

9 Q: They had reported the findings already?

10 A: There were not findings. There's a difference.
11 They're not even -- manage letter -- there are
12 points of -- things go really bad, they could
13 become a management letter or finding. There
14 was levels. This was the lowest level of these
15 are things you need to do. It wasn't because
16 they pointed out things you need to do.
17 Because they weren't things I did wrong. They
18 were things other people did wrong. It was the
19 way he was saying I was lying about
20 implementing these procedures. It was the way
21 he was saying it was my fault these people did
22 this. I was complaining about how he was
23 hurting me in those comments and statements,
24 not about what he found.

25 Q: And those comments and statements made to the



1 board occurred before you made a harassment
2 complaint?

3 A: Yes. They were part of the harassment.

4 Q: And you had contacted the audit firm and tried
5 to end their contract, didn't you?

6 A: No. I would never want to end that contract.
7 Again, they are the only firm that should audit
8 any district. I contacted Mr. Finney, who I
9 have known -- I knew from years -- many, many,
10 years before when I worked at the City about
11 what was going on, soliciting his help.

12 Q: Dr. Slayman was contacted, and she informed you
13 that the audit firm had called her saying that
14 you had initiated the process to terminate
15 their contract?

16 A: No. Because I didn't do that. I contacted him
17 asking for help. I think because -- I thought
18 Mr. Finney was saying that we could -- not have
19 Kevin work with us, I did, at that point, ask
20 him to -- okay, well, then that's great. Can
21 we just have him not work with us -- with me.
22 But that it was never terminate the contract or
23 anything like that. That it was -- I know
24 that -- Larry didn't present it to her that way
25 because that's not how I presented it to him.



THE STATE OF SOUTH CAROLINA
In the Administrative Law Court

APPEAL FROM THE SOUTH CAROLINA DEPARTMENT OF
EDUCATION

Docket No: 19-ALJ-30-0337-AP

Dr. Agnes Slayman,

Appellant,

v.

South Carolina Department
of Education,

Respondent.

RECORD ON APPEAL

Volume II

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1 Q: And you acknowledge from your testimony that
2 you specifically said this individual didn't do
3 anything of a sexual nature towards you, and
4 that's what you informed Dr. Slayman of as
5 well?

6 A: He was harassing me, but I did not get the
7 feeling he was asking me to sleep with him.
8 That's what I mean. But sexual harassment is
9 more than asking someone to sleep with you.

10 Q: So the allegations that you were making with
11 regard to the harassment of some sort was that
12 he invited you to discuss things at either
13 lunch or dinner?

14 A: He -- it was when he made -- when he looked at
15 me in that room and said -- or mouthed, see,
16 you should have gone to lunch with me, that was
17 when I knew there was something more than, oh,
18 I'm hungry and I've got a meeting somewhere, so
19 let's do this at lunch. It wasn't, let's order
20 in and sit here and talk about this in front of
21 other people. It was always to do that. So it
22 wasn't like he was inviting me to go talk about
23 this -- it was he was trying to force me to do
24 what he wanted. He, a man; me, a woman.
25 That's how it's sexual harassment.



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1 Q: And the force thing that he wanted that
2 you're -- the only thing that you're alleging
3 is a meal?

4 A: He was forcing me to spend time alone with him,
5 and I'm assuming that would have included
6 eating. And not even alone in a room, because
7 we would have been in a restaurant. It was --
8 it -- and he was trying to use his power over
9 me to do what he wanted.

10 **HEARING OFFICER:** Ms. Polvi, she's answered this.
11 Let's move on.

12 Q: And Dr. Slayman investigated your concerns, did
13 she not?

14 A: She said she did. I don't know how she did.

15 Q: In June 2015, the board had intended to
16 terminate your employment, didn't they?

17 A: I have no knowledge of that.

18 Q: Dr. Slayman informed you of that all but Rick
19 Hughes had discussed the termination of your
20 employment?

21 A: I'm not aware of that, because you're saying in
22 June. In, I don't know, March or April, the
23 board had approved with -- my contract with all
24 other contracts, so I have no reason to believe
25 that that occurred.



1 Q: Dr. Slayman informed you that the board's
2 concerns related to Dr. Littlefield's financial
3 review of the district? And that's a different
4 person than the ---

5 A: Oh, goody. Thank you.

6 Q: Well, excuse me. I haven't even ---

7 A: I had forgot to bring it up. But since you did
8 and opened the door.

9 Q: Mrs. Stroud, I haven't even finished my
10 question.

11 A: You don't have to. I don't even know what
12 Dr. Littlefield's review -- I never saw a
13 report. But I'd love to discuss that?

14 **HEARING OFFICER:** Let her finish her question.

15 **THE WITNESS:** Okay.

16 **HEARING OFFICER:** And then you can talk.

17 **THE WITNESS:** Sorry. I apologize.

18 **HEARING OFFICER:** Go head. Finish the question.

19 Q: And this open-door thing ---

20 **MS. POLVI:** Is it this -- let me just also preface
21 this. This is not an opportunity for her to
22 give another half-hour answer.

23 **THE WITNESS:** I'll try not to make it a half hour,
24 but I'll go ---

25 **HEARING OFFICER:** All right. Let's go ahead with



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1 your question.

2 Q: Did Dr. Slayman inform you that the board had
3 concerns about a financial review by a
4 gentleman named Dr. Littlefield, who was
5 different person than the individual you
6 accused of sexual harassment or harassment of
7 some sort; isn't that accurate?

8 A: Dr. Slayman never discussed that matter with
9 me. Never.

10 Q: Dr. Slayman told you that she was informed by
11 the board that they wanted to hire a chief
12 financial officer?

13 A: Dr. Slayman asked me about -- she asked me
14 about -- I only have an associates degree with
15 30 years or so of experience. And she told me
16 that there were board members who were
17 concerned about that. And they wanted -- they
18 would not name me chief financial officer,
19 which she had tried to get them to do, because
20 I did have a four-year degree and that they
21 wanted to hire someone a four-year degree who
22 they would call a chief financial officer.
23 They didn't want me, is basically what it is.
24 She never told me that they were trying to fire
25 me. She told me they would not give me the



1 title because I didn't have the degree. And
2 then she brought up the matter that
3 Dr. Littlefield investigated. But she didn't
4 discuss that he was gonna evaluate it with me.

5 Q: You were upset that your financial management
6 of the district was being reviewed?

7 A: No.

8 Q: And that the board ---

9 A: It was upsetting what all took place that --
10 you'll let me talk about. But, I mean, I had
11 no -- my audits speak for themselves, honey.
12 I don't care who looks at it. I -- no. I
13 mean, I had a perfect audit.

14 Q: The Chester County School Board had frozen your
15 salary, did they not?

16 A: Yes.

17 Q: And the salary was frozen years before
18 Dr. Slayman was superintendent, correct?

19 A: Yes.

20 Q: And that you ultimately later got salary
21 increases, didn't you?

22 A: Yes.

23 Q: And Dr. Slayman questioned you about it?

24 A: She asked me what went on about that; yes.

25 Q: And when Dr. Slayman questioned you about pay



1 increases after this Chester County School
2 Board had frozen salary, you responded to
3 Dr. Slayman by saying, well, they approved the
4 budget, didn't they?

5 A: I don't know that I said that. When she asked
6 me how my salary had increased, they said my
7 position was -- there was restructuring. They
8 approved the restructuring and salary raises as
9 part of the budget.

10 Q: And you were told when the salary was frozen
11 that you were required to take additional
12 financial education credits and classes,
13 weren't you?

14 A: I was -- there was a letter -- you've probably
15 got a copy of it in my file --- that said that
16 they didn't want someone as director of finance
17 that didn't have a four-year degree, that my
18 salary was frozen. They thanked me for doing
19 the CFO's job that entire year and paid me
20 \$2500 to do it and let me know they were gonna
21 hire a CFO, which they ultimately did. And I
22 don't know that -- it just said that they
23 didn't want someone in that position that
24 didn't have a four-year degree. I don't
25 recall -- it was a very brief letter -- that if



1 it said I had to attend classes to get an
2 increase. But it was gonna be frozen. I'm
3 sure you've got it, if you want to read it.

4 Q: Just prior to you initiating a hostile work
5 environment complaint against Dr. Slayman, she
6 had told you that she was concerned that you
7 were getting salary increases after the board
8 had voted to freeze your salary?

9 A: I apologize, but could you say that again?

10 Q: Sure. Shortly before you filed this complaint,
11 Dr. Slayman had a conversation with you saying
12 she was concerned that you were getting salary
13 increases and proposing salary increases to
14 yourself after the board had already frozen
15 your salary?

16 A: What do you mean short, a day, two days, month,
17 six months? It was within the year. I don't
18 know how -- I don't know the time line between
19 that conversation and when this occurred. I
20 don't -- it was within a year. And that would,
21 in my world, be short term. So it wasn't the
22 reason but ...

23 Q: And if Dr. Slayman recalls that conversation
24 occurring in summer of 2015, would you dispute
25 that?



1 A: Since I don't exactly remember the time line,
2 I cannot say that it did or didn't. There is
3 other information I could look at to verify
4 when it occurred because of things that
5 happened you're gonna allow me to speak on.
6 But at this moment, no, I can't dispute that.

7 Q: And I believe you testified earlier that you
8 were aware that Dr. Slayman had advocated for
9 you to be able to keep your job?

10 A: I don't know that I said that, because I think
11 Dr. Slayman, on a regular basis, is poisoning
12 me in the minds of the board members to get rid
13 of me. I don't know that she advocated for my
14 job. She told me that she was going to try --
15 you know, that she was gonna-give-me the title
16 of CFO. But instead, they gave me the title of
17 executive director.

18 Q: And you kept your job after Dr. Slayman,
19 correct?

20 A: Yes.

21 Q: And the end of your employment, your retirement
22 didn't come until essentially three
23 superintendents later where Charles King was
24 a -- an interim for a brief time, then Keith
25 Callicutt, and then Dr. Bain?



1 A: Dr. King was acting only. And then the interim
2 was two, three months, tops, Dr. Callicutt, and
3 then Dr. Bain; yes.

4 Q: And Dr. Slayman had been working with you on a
5 work improvement plan prior to you lodging this
6 complaint, correct?

7 A: You mean her work improvement plan?

8 Q: Well, what awareness do you have about a work
9 improvement plan that your boss would have?

10 A: Well, did you say I had a work improvement
11 plan?

12 Q: Right. Improving work not in terms of a
13 official reprimand but in general working on
14 improving the financial ---

15 A: No.

16 Q: --- fiscal records for the district?

17 A: No. I don't recall there being a
18 improvement -- that she had an improvement plan
19 on me. I had a perfect audit that year. I'm
20 not exactly -- I mean, there's always room for
21 improvement, but I had finally accomplished
22 what I had wanted to do with no manage letter,
23 no notes, and no findings. So I'm not sure
24 what you're alluding to.

25 Q: When you submitted the grievance complaint



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1 about Dr. Slayman, to whom did you give it to?
2 A: I didn't. I simply signed a letter. I don't
3 know who -- I don't -- it was a letter that we
4 all signed that said that it was a grievance.
5 I didn't give it to anyone, or one of the
6 others forwarded it to -- I don't know if it
7 was our attorney at that time or the school
8 district's attorney. I don't know who -- if it
9 was given to the board chair. I don't know who
10 was the recipient of that letter. I don't
11 know.

12 Q: In your complaint, the September 8th, 2015,
13 grievance that you're a signator to, this
14 occurred after you were angry with Dr. Slayman
15 about bringing --- supporting Defender; isn't
16 that right?

17 A: I wasn't angry with her about supporting
18 Defender.

19 Q: In your words about it in your statement are
20 not true?

21 A: Did I say I was angry? You'll have to point
22 that out. I'm -- I mean, I've testified I was
23 concerned about the safety.

24 Q: You participated in the ouster of a previous
25 superintendent of Chester County School



1 District as well, didn't you?

2 A: I was employed when a previous superintendent
3 resigned from his duties after the board was
4 dissatisfied with changes he was planning to
5 make within the organization.

6 Q: And those changes were financial in nature,
7 weren't they?

8 A: Financial in nature? They -- he was going to
9 restructure positions. So ultimately that
10 could have involved monetary changes, if you
11 put a person that makes lesser in a position.
12 So there would have been some financial impact.
13 But his changes were going to restructure
14 the -- serve many employees within the district
15 and how instruction -- he was gonna cut out
16 positions in instruction. He would -- but
17 he -- I mean, he wasn't doing any changes in
18 finance, to the best of my knowledge.

19 Q: And you sought to remove Barry Campbell from
20 the superintendent position?

21 A: Barry Campbell? Barry Campbell? Dr. Campbell
22 was the superintendent that was there when I
23 was hired in 2001. And I believe after --
24 well, it was several years. It must have been
25 2006-'07 school year. After he made a



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1 recommendation to put me over finance at the
2 same meeting, he announced his retirement. So,
3 retirement, he was in his 60s. Retirement to
4 go to Florida and live happily ever after. So,
5 no, to that. It's funny.

6 Q: You told Dr. Slayman that you were angry with
7 the previous superintendent over not giving you
8 a raise that you felt entitled to?

9 A: No, I did not.

10 Q: You testified earlier about your son being in
11 high school?

12 A: Yes.

13 Q: And you're aware that the sheriff publicly
14 published in the media, the school's
15 weaknesses?

16 A: He, as I mentioned, infiltrated -- had someone
17 infiltrate the middle school, Chester Middle
18 School, and he pointed out the weaknesses at
19 that school. Chester High School, where my son
20 attends, was built in 1975. There is -- it's
21 a pod. It's open. He didn't advertise the
22 weaknesses about at that school. They're just
23 there. I mean, everybody knows what they are.
24 That's why they've had to -- resource officers
25 deputized individuals at that school, because



1 they exist. That was established a long time
2 ago.

3 Q: So you, as a parent, wouldn't be concerned that
4 the sheriff's office was publicly showing
5 weaknesses for potentially an active shooter or
6 some other type of violent act?

7 A: As a parent, I was concerned that Dr. Slayman
8 was taking trained personnel out of that
9 office. No. I was not exactly sure about that
10 it. I hate he did it because it caused
11 problems; it was an embarrassment to her; and
12 that wasn't right. But he was trying to do it
13 to get the county to agree to provide more
14 security.

15 Q: How many times did you and the other grievants
16 meet to discuss, as a senior cabinet, ways to
17 remove Dr. Slayman?

18 A: It was three, maybe four. We didn't discuss
19 removing her. We discussed what are we gonna
20 do. And then we contacted the South Carolina
21 Education Association and talked to them to
22 find out what we needed to do as a group.

23 Q: And had you filed any grievance of your own
24 prior to being interviewed by Betty Bagley?

25 A: No.



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1 Q: Those are all my questions.

2 **HEARING OFFICER:** Okay. Mr. Winburn?

3 **MR. WINBURN:** Nothing else here.

4 **THE WITNESS:** Do I get to follow up about the
5 Littlefield issue? I know it's been a long
6 time.

7 **HEARING OFFICER:** Mr. Winburn, do you want to follow
8 up on the ---

9 **MR. WINBURN:** Well, I think she had wanted to say
10 something. But I don't ---

11 **MS. STROUD - REDIRECT EXAMINATION BY MR. WINBURN:**

12 Q: Maybe in a summary, can you give us a time line
13 of the Littlefield involvement?

14 A: After the board decided to freeze my salary,
15 they hired a CFO. And he worked with us for
16 about a year. And he was terminated because he
17 invited another member of the staff to go to
18 out in the yard for some fisty cuffs. When
19 that occurred, it was during the time when
20 recession again was taking place. We had three
21 executive directors, that superintendent, got
22 rid of in the budget, proposed to eliminate,
23 and have the three people other people
24 myself -- the -- I don't know -- the assistants
25 in those departments, head up those the



1 departments. It was a cost-saving measure.
2 The budget was outlined how the restructuring
3 would be, and the board approved that. And
4 from that point on, when we got raises, we got
5 raises. There was not any mention -- I had --
6 that had been -- it'd been several years after
7 that, so I had -- and I just -- there -- that
8 was gone. That overrode the previous. So when
9 Dr. Slayman brought that up, I was stunned.
10 And then Dr. Littlefield, he came in with
11 Shawn, asked for some files, and he started
12 talking about that time. He came by a couple
13 of times. Then I -- he called me and asked me.
14 And he just finally told me, Dr. Slayman has
15 asked me to investigate this because the board
16 froze your salary and you've been getting
17 raises. So I knew what he was looking at
18 because of the time line he was asking about.
19 It was -- I don't know -- maybe a month it took
20 this long to occur.
21 So finally he's like, well, he -- there was
22 nothing. And there wasn't anything in my
23 personnel file that said that this was done.
24 And so he said, do you have anything? And I
25 said, well, yes, sir, come to my office. And

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1 he did. And I gave him some documents he was
2 looking at, I explained what had happened. And
3 I told him, I said, Dr. Littlefield, I said,
4 I'm concerned about this. I said, I don't --
5 I said, I feel like I'm being accused of
6 stealing. I said, I don't know if I'm gon'
7 lose my job. Am I going to jail? And he said
8 to me, there's nothing felonious here. And I
9 thanked him for that, and I know that he
10 presented a report to the board. There was
11 never any mention after that. Nothing
12 happened, and life just rolled on along. So I
13 don't know what his report was. I've asked for
14 it, but I don't know. I don't -- and I asked
15 Dr. Callicutt if he could ask for it after
16 Dr. Slayman was gone. 'Cause I don't know what
17 it said, if it was said. I was doing my job,
18 the job they gave me to do. Thank you.

19 **MS. STROUD - EXAMINATION BY THE HEARING OFFICER:**

20 **HEARING OFFICER:** The only -- I got one, one quick
21 question, and it's a simple one. Let me get
22 back up here to -- so you said that you worked
23 for the Chester School District from 2001 to
24 the time that they ended your TERI basically.

25 A: When my TERI ended.



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1 HEARING OFFICER: When your TERI ended?

2 A: Which would have been May 31st of 2017.

3 HEARING OFFICER: Okay. And that was my only
4 question. I just needed a time line there.

5 A: Thank you.

6 HEARING OFFICER: All right. Anything further?

7 MS. POLVI: No.

8 HEARING OFFICER: All right. Thank you very much.

9 THE WITNESS: Thank you.

10 (Witness excused.)

11 MR. WINBURN: You want to do the next witness or a
12 five-minute break?

13 HEARING OFFICER: Five-minute break, please.

14 (A break was taken.)

15 HEARING OFFICER: All right. If you'd like to
16 continue with your next witness, Mr. Winburn?

17 MR. WINBURN: Thank you, Ms. Pike. We're gonna call
18 Ms. Jeanie Ligon.

19 HEARING OFFICER: Okay. Ms. Ligon, would you let
20 the court reporter swear you in, please?

21 CAROL JEAN LIGON, having been duly sworn, testifies
22 as follows:

23 MS. LIGON - DIRECT EXAMINATION BY MR. WINBURN:

24 Q: Ms. Ligon, would you please state your full
25 name for the record?



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1 A: Carol Jean Colones Ligon.

2 Q: And, Ms. Ligon, if you could, give us a brief
3 recitation of your professional credentials and
4 tell us where you work.

5 A: Okay. Currently work at the Chester County
6 School District. I am certified as a certified
7 special education teacher. I'm a school
8 psychologist, and I am currently the executive
9 director of special services for the district.

10 Q: Okay. How long have you been at the district?

11 A: Let's see. My son is ---

12 Q: Approximately?

13 A: Approximately 27 to 26 years.

14 Q: Okay. And you're from Chester originally?

15 A: No.

16 Q: Where ---

17 A: I married a gentleman from Chester.

18 Q: Where are you from originally?

19 A: The longest I lived was Sumter, South Carolina.
20 My dad was in the military and then worked at
21 Shaw Air Force Base, so Sumter's considered my
22 home town.

23 Q: Okay. And the court reporter's taking down
24 everything you say so ---

25 A: Okay.



1 Q: You're a little soft-spoken.

2 A: All right.

3 **HEARING OFFICER:** I'm sorry did you say that you had
4 been with the district 27 years?

5 **THE WITNESS:** Approximately 26 or 27 years.

6 **HEARING OFFICER:** Okay. Thanks.

7 **THE WITNESS:** I don't exactly recall.

8 Q: Of course, we are here today in connection with
9 allegations that, due to interactions with
10 Dr. Agnes Slayman, you are among the five folks
11 that filed a grievance of a hostile work
12 environment; is that accurate?

13 A: I did not file a grievance. I was not ---

14 Q: Sorry.

15 A: --- one of the once that filed the grievance.

16 Q: You weren't on this. I'm looking at -- and
17 your name isn't on here. Okay. I'm -- I
18 apologize.

19 A: It's okay.

20 Q: So please make sure the record is clear. You
21 did not sign. What is your -- let me ask you
22 this: Where is your office in connection with
23 Dr. Slayman -- where Dr. Slayman's office was
24 at the time?

25 A: The building has two distinct sides to it and



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1 a side, you know, with a lobby and mail room
2 and break room, and I'm on the opposite side.

3 Q: Okay. Same suite of offices, or are you with
4 the HR folks?

5 A: No. I'm on the front hallway, and HR is on the
6 back hallway.

7 Q: Okay. So within earshot of -- in the same
8 proximity as Dr. Slayman and Charles King and
9 Jeff Gardner?

10 A: No. I'm on the opposite side of the building.

11 Q: Okay. Sorry. I'm ---

12 A: Yeah. I'm on the right side of the building.

13 Q: Okay. What was your day-to-day interaction
14 with Dr. Slayman? In other words, how often
15 did you see her? Did you meet with her on a
16 regular basis?

17 A: The principals' meetings, you know,
18 instructional meetings, events such that. If
19 there was a specific situation with a special
20 education student or a question about something
21 like that, maybe coming and going from the
22 building. But other than that ...

23 Q: Are you considered to be part of the senior
24 staff or the senior cabinet?

25 A: At one time, I was part of the senior cabinet.



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1 But when Dr. Slayman came, she discussed that
2 with me and made some changes and told me that,
3 you know, I would not be part of the senior
4 team.

5 Q: Were you offended by that in any way?

6 A: No. I let her know that she was the
7 superintendent. She needed to make the
8 decisions to run the job she needed. Never
9 been into -- so that was fine with me.

10 Q: Now, I have a couple of questions about -- do
11 you perform a role as a school psychologist?

12 A: I have through the district and still do
13 currently. You know, recruiting is sometimes
14 difficult when you live in a rural area, and we
15 have been consistently short on being able to
16 fill vacancies for school psychologists. And
17 so with a district of 5,000 and something, I
18 usually end up playing that from week to week
19 so ...

20 Q: Okay. Now, I will submit to you -- and you
21 know this, I'm sure -- that we are here in
22 connection with allegations of unprofessional
23 conduct of a hostile work environment. Are you
24 familiar with those allegations in general?

25 A: I am.



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1 Q: Okay. Can you tell me anything -- any
2 experience that you had, if you had one, with
3 Dr. Slayman that caused you any concern, any
4 specific statements she may have made to you or
5 to others that caused you concern?

6 A: The situation that I recall the most was in
7 regards -- and I want to be very careful here
8 and not violate FERPA in any situation to the
9 student -- a parent and principal had requested
10 that I take a look at a student's previous
11 assessments and data. The student was
12 currently in college. And they were first just
13 asking for some general information that I get
14 to them as parents in the school. And I got
15 the student's consent 'cause the student was of
16 age. And did that. That would have been like
17 in December of '14 or January of '15 is about
18 that when started to occur.

19 I let the parent and the principal who had that
20 as one of his former students, let them know
21 that what they were asking me to do was
22 something that we couldn't do. They wanted us
23 to write a letter indicating the student had a
24 disability in a specific area to address some
25 needs the student was having at the -- at the



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1 time at the college towards graduating, being
2 able to graduate. I contacted the former
3 school psychologist who did the actual
4 assessment. We looked over all the information
5 that we had at the time. And it had been a
6 while since we had assessed that student. And
7 we did not assess that student for that
8 particular thing that was being requested of
9 us. So I let the principal and the parent and
10 the student know that we would not be able to
11 do that. All that we could do was write a
12 letter that the student did receive
13 accommodations to support their academic needs,
14 you know, while in high school.

15 Q: Under 504 ---

16 A: IEP ---

17 Q: --- accommodations? IEP.

18 A: It was IEP.

19 Q: Okay.

20 A: The student had not yet accessed the college's
21 learning success center that's available to
22 students with disabilities. He had not done
23 that, so I suggested that. I called the
24 college to see if it was still too late 'cause
25 the student was getting towards graduation, and



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1 gave that information to the parents and the
2 student and encouraged them to do that.
3 And so I shared that information with
4 Dr. Slayman and Dr. King sometime. I can't
5 recall if it was February, January, but we did
6 prepare a letter and we shared it, you know,
7 with the school and parents and student. So I
8 shared that with them because I felt I needed
9 to 'cause the principal was asking me, and, you
10 know, it might come to her at some point. I
11 tried to -- I've always tried to -- something
12 may come back and try to, you know, prep or
13 FYI ---

14 Q: All right.

15 A: False or whatever. So I kept getting requests
16 from the parent, you know, to see what else I
17 could do, if there was anything else we could
18 do. I offered to meet with the student over
19 the student's spring break. The student didn't
20 choose to do that. You know, there were some
21 other conversations with the principal.
22 And then one day -- I don't recall when it was,
23 but I know it had to be close to the student's
24 graduation, because last e-mail I could recall
25 was, you know, the parent indicating is there



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1 anything else you can do. We've got graduation
2 announcements to order. You know, and so I was
3 called in her office one day and ---

4 Q: Called -- I'm sorry. Called in to whose
5 office?

6 A: Dr. Slayman's office. And Dr. King was there.
7 And she asked me about the situation. And I
8 began to share what I had already done and the
9 reasons why we couldn't do that. I did not
10 have the information to make a statement that
11 this child had a disability in that area. I
12 could not say something that I didn't have
13 knowledge of or documentation of. It was
14 impossible for us to do. The student had
15 already graduated and received FAPE and was
16 done in the school district. And I encouraged
17 the student and the parents that, you know,
18 this university or college had a program that
19 would provide and assessment, allow
20 accommodations. They just needed -- he needed
21 to access that.

22 So I shared that information. And she
23 continued to discuss with me in different ways,
24 you know, wouldn't I do it because this student
25 might need it? You know, sometimes people just



1 need a little bit of help. I don't recall
2 exactly verbatim, but it was in that realm of
3 discussion. And it was just persistent and
4 reoccurring for me to write this letter, and I
5 had felt like I was having to explain myself,
6 that I could not write the letter. And the
7 psychologist felt like she could not write the
8 letter.

9 And so then she began to talk about, well, she
10 had heard or been told that the parents were
11 gonna get an attorney. And at that time, it
12 was just the way it was stated, I felt somewhat
13 intimidated. And she began to talk about, you
14 know, the need to do this. And I felt very
15 uncomfortable. I felt like I was being asked
16 to do something that was unethical.

17 Q: Right.

18 A: And I do remember making some kind of
19 statement, well, do I need to get an attorney?
20 I felt at unease in regards to that
21 conversation.

22 Q: And how did you leave that meeting? How did
23 you -- did you resolve the issue?

24 A: I mean, I just let her know that it was not
25 something that I could do or the school



1 psychologist that had assessed the student
2 could do.

3 Q: Did she express this -- any particular
4 displeasure as the meeting ended, or do you
5 remember exactly how the meeting ended?

6 A: No. I just felt like I needed to end the
7 conversation. I mean, I just felt -- I just
8 was wanting to leave the room. I felt
9 uncomfortable. You know, I -- to be asked to
10 do something that I considered unethical made
11 me feel very uncomfortable.

12 Q: And I know this is maybe a very specific
13 question, but do you remember if the door was
14 open -- was -- to her office, or was it closed?

15 A: No. I don't recall. I don't recall.

16 Q: Okay. Now, your role as a school -- are --
17 you're a trained school psychologist, correct?

18 A: Correct.

19 Q: All right. And as I understand your role, the
20 school psychologists perform -- their main
21 function is to test students to determine if
22 they are eligible for special ed services?

23 A: Correct.

24 Q: Is that a fair assessment?

25 A: Correct.



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1 Q: Okay.

2 A: That's one of the things, uh-huh.

3 Q: So the assessment that you referenced earlier
4 that had been done by another school
5 psychologist, how long -- or how many years had
6 gone by since that assessment had been done?
7 It could be approximate.

8 A: I don't have the record here before me,
9 obviously, but just recollection, maybe upper
10 elementary school.

11 Q: Okay.

12 A: Or beginning of middle school. We do do
13 reevaluations but not always full
14 reevaluations. But I can just recall
15 discussing that assessment, the last evaluation
16 that we had.

17 Q: So we may be talking over ten years earlier ---

18 A: Yes. Yes.

19 Q: --- to essentially amend an assessment, the
20 results of an assessment, that had been done on
21 this particular student who's now on the verge
22 of graduating from college?

23 A: Right. Because the evaluation was complete,
24 obviously, and the outcomes were in that
25 report.



1 Q: Right. And you mentioned FAPE just a minute
2 ago, and I want to make sure the record's
3 clear, Free Appropriate Public Education,
4 that's an acronym, correct?

5 A: Correct.

6 Q: Okay. And that is what is -- I guess the rule
7 is if you are providing FAPE to a student,
8 that's the requirement if the student -- until
9 the student turns 21; is that a fair ---

10 A: 21 or graduates in our state, a South Carolina
11 high school diploma.

12 Q: Right. So once that student graduated having
13 received FAPE, throughout that period of time,
14 as I understand your testimony, it would have
15 been inappropriate to come back and correct the
16 record, or change the record?

17 A: Yeah. Without some additional information or
18 something. But we would not have changed that
19 evaluation report; correct.

20 Q: Understood. Okay. Now, as you know, you've
21 been here for a long -- two days waiting to
22 testify. So you're aware of some other folks
23 who have testified here in this case. Did you
24 have any interactions with senior staff about
25 Dr. Slayman that you -- that stick out in your



1 memory or that may have caused you concern or
2 that might help the hearing officer with her
3 deliberations?

4 A: I think something that stands out in my mind is
5 when you work with people, you know, those are
6 your coworkers, and sometimes you spend more
7 time with them at work. And they become your
8 coworking family, so to speak. The thing that
9 stands out in my mind the most, it could be
10 in -- a moment where one of them would enter my
11 office and be crying, upset, visibly shaken,
12 and just tell me that they just needed a
13 moment. You know, when someone presented
14 that -- I don't know if it's my background or
15 training or instinct, but that -- just not to
16 begin asking them questions. I didn't know
17 what they had just experienced. It was more
18 just felt like they just needed a time and a
19 place to regroup.

20 And when you come in my office, if you were to
21 come in my door and go to the far right, you
22 could be away from the window of the door and
23 not be seen. And I have a chair there, and
24 that's just sometimes where they'd sit. I
25 would ask them if they'd want to talk about it.



1 A lot of times they would not want to talk
2 about. They just needed a moment. It was very
3 upsetting to me to see that.

4 Q: Is there any indication -- you may or may not
5 know -- these times when folds would come into
6 your office, do you know whether it would
7 relate to an event outside of work, or was it
8 related to something at work?

9 A: They'd let me know it was related to something
10 to work. They had just come from her office,
11 or something had happened. Sometimes they
12 weren't very specific. But they were upset,
13 and they were scared and shaking and just, you
14 know ...

15 Q: And just for the record, can you share with us,
16 if you remember, the different individuals that
17 have -- would have -- that came to your office
18 in that same sort of scenario you that you just
19 described?

20 A: It was probably mostly Brooke Clinton, Anna
21 Stroud. There was one occasion I was coming
22 out going to the mail room, and I ran into
23 Ms. Clinkscales, Shawn Clinkscales. And she
24 was visibly upset. And I asked her if she was
25 okay, and she said, you know, I just need a



1 minute. And I offered her to come into my
2 office, and she did for a few minutes and then
3 just left.

4 Q: And, for instance, that particular time, do you
5 recall whether she associated whatever that it
6 was that had upset her with Dr. Slayman?

7 A: Uh-huh.

8 Q: I'm sorry?

9 A: Yes.

10 Q: Okay.

11 A: Yes. There were few occasions when I went to
12 that side of the building, and I may pass by
13 Mr. Gardner's door. I may have had -- needed
14 to see him, and I would walk in, and he
15 appeared to be visibly shaken or upset to the
16 point where I felt like I needed to have
17 someone maybe check his blood pressure, because
18 he had made me aware that was a problem for
19 him. And there were a few occasions where I've
20 called one of our school nurses to come over.
21 I didn't know if I needed to call his wife. I
22 just -- you know, I just wanted to sure he was
23 okay.

24 Q: Do you remember any specific statement while
25 you were on any of those visits on the other



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1 side of the building that -- coming from
2 Dr. Slayman that stand out in your memory?

3 A: Not a specific statement that they said that
4 she said. I mean, I just can't recall. It's
5 been such a while ago. But just enough to know
6 that it was something that had just happened
7 or ...

8 Q: Now, would she -- would Dr. Slayman call on
9 you. Did she call your telephone and ask you
10 to come?

11 A: She did.

12 Q: How often would she call you over?

13 A: It was generally something that had to do with
14 a special education student. Maybe a parent
15 called in; maybe a principal called in to ask
16 something.

17 Q: And how would you describe the request to come
18 over and see her, if you can remember? Was it,
19 hey, come see me when you have a chance; come
20 see me right now?

21 A: It was generally come see me right now.

22 Q: Okay. Did you hear her summon -- summon or
23 call other employees while you were around --
24 in that -- in the buildings, in that part of
25 the building?



1 A: I did. I did. It could be maybe in the
2 business office or -- I also had to -- a lot of
3 business with the attendance director that was
4 over there. And she had two doors to her
5 office. And there would be occasions where I
6 would hear her call out for Dr. King or
7 Mr. Gardner. And she would generally call them
8 by their first name. I never saw her. I just
9 heard her voice. And it was, you know, being
10 inside a professional building, it was not, you
11 know, Dr. King, can you come see me? It was,
12 you know, more -- just a loud call with their
13 first name, like, you know, with some emphasis
14 behind it.

15 Q: Okay. Give me one second. Okay. Is there
16 anything else that -- I know it's an open-ended
17 question, so I apologize to the parties -- but
18 any other specific instance or interaction that
19 sticks out in your memory that you think you'd
20 like to share?

21 A: One other occasion I felt very uncomfortable,
22 I was -- there was a meeting already gone on
23 that I was not originally a part of but asked
24 to come in to. And that was -- the best I
25 could recall, it was high school principals.



1 Some of the athletic directors with the high
2 school principals, if I can recall. I believe
3 Mr. Gardner was in there because that was part
4 of his duties with the athletic directors.
5 And there was a meeting going on, and they were
6 discussing athletic trainers at that point in
7 time when I came in. And there was an
8 individual who was an athletic trainer for
9 Great Falls High School at the time, and he
10 also, during the day, was working on a grant
11 that we received, a health grant called the
12 Catch Program. So I interactions with him for
13 that. And I was asked -- you know, something
14 about this individual had gone -- been called
15 on active duty, and I was asked if he had told
16 me that he was gonna be going on active duty.
17 And I shared that he did. He had shared with
18 me that he was and did his paperwork with HR.
19 I was aware of that.
20 And if I can recall, the athletic director from
21 the high school that he was serving made a
22 statement or question or something about that
23 he didn't have good communication with him. He
24 didn't know if he was coming or not coming and
25 was alluding to that. So there was a



1 discussion for a little bit about that.
2 And there was a statement from Dr. Slayman,
3 well -- and I don't know the exact quote, but
4 it was in regards -- I do remember this --
5 that, well, when he returned, you know you do
6 not have to have him back. And I guess me
7 being in the military, I do know that when
8 someone goes on active duty, there is a
9 requirement to reemploy our active duty,
10 whether it's National Guard or Marines or Army,
11 and that really disturbed me.
12 And there was a little bit more discussion.
13 And she had shared with them something about
14 when she was principal or something in Kershaw
15 she had had an employee or an individual -- I
16 don't recall if she was principal at the time
17 or at the district office -- but that she had
18 an individual who had to go out on active duty
19 and she knew how to take care of it. And she
20 alluded that she had called that commanding
21 officer of that individual. You know, and I
22 shared that I knew that this individual had
23 stated he knew it was coming because he had
24 been told of a large drill that was happening
25 nationwide and that he would probably be



1 called. So I was expecting it. And I think he
2 shared that beforehand and that he had done his
3 paperwork.

4 And that was just very disturbing to me. And,
5 again, I'm gonna use the word "unethical." I
6 just can't imagine that, someone making a
7 statement like that for someone who's gone to
8 serve our country, whether they're here or
9 abroad.

10 Q: Okay. Anything else that you can think of? I
11 appreciate your time.

12 A: No. Maybe if I was asked a question. But, no,
13 I just ---

14 Q: Yeah. I know. No. I -- that's what I knew to
15 ask. You may answer any questions Ms. Polvi
16 would have.

17 **MS. LIGON - CROSS-EXAMINATION BY MS. POLVI:**

18 Q: Hello.

19 A: Hi.

20 Q: I just want to ask a quick follow-up as well
21 about the conversation related to military that
22 you were just testifying about.

23 A: Uh-huh.

24 Q: Fair to say that you were not there throughout
25 that entire conversation at the meeting?



1 A: No. I was asked to come in to the meeting.
2 That's correct. I was not there at the
3 beginning of the meeting.

4 Q: So some things had already taken place prior to
5 your presence?

6 A: I'm sure they had. The meeting was ongoing.

7 Q: I want to follow up about the matter -- I think
8 it's the student Lander matter in your
9 testimony. I'm gonna hand you what's marked as
10 Respondent's Exhibit 19.

11 **MR. WINBURN:** And just for the record, Ms. Pike, I
12 have objected to this. It's hearsay. I don't
13 know if Mr. or Ms. P[REDACTED] planned to testify
14 or not, but I certainly will wait to hear for
15 questions but ...

16 **MS. POLVI:** I think it's pertinent in terms of she's
17 testified about these events, and this is
18 actually the parents' statement regarding the
19 same events.

20 **MR. WINBURN:** And, Ms. Pike, it's not dated. I
21 just -- cautious about it.

22 **HEARING OFFICER:** I'm -- this is definitely hearsay.
23 I mean, I don't think Ms. Ligon -- you can ask
24 her if she received a copy of this.

25 **THE WITNESS:** I've never seen this before, to my



1 knowledge.

2 **HEARING OFFICER:** I mean, if she has no recollection
3 of it, I don't ---

4 **THE WITNESS:** It was not sent to me.

5 **HEARING OFFICER:** This was -- this is hearsay. I'm
6 sorry. I'm not gonna let this in.

7 **MS. POLVI:** I beg your indulgence just for a moment
8 to -- if I can see, I think, an exception might
9 fit within just to preserve it on the record.
10 I beg your indulgence for a moment.

11 **HEARING OFFICER:** Okay.

12 (Off the record.)

13 **MR. WINBURN:** I think this would fall into the --
14 one of two exceptions Rule 803, 1 or 3, present
15 sense impression or then existing emotional or
16 physical condition. And this is a --
17 purpose -- is defined here as the purpose of
18 the letter is to inform you of a situation and
19 describes through the events as described here.
20 So I think it would fit into one or two of
21 those exceptions.

22 **HEARING OFFICER:** What was your first one?

23 **MR. WINBURN:** The present sense impression.

24 **HEARING OFFICER:** I don't think this falls under
25 present sense impression. I don't -- what was



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1 your second one?

2 **MS. POLVI:** Then existing state of mind.

3 **MR. WINBURN:** Your Honor, I mean, Ms. Pike, it's not
4 even dated. I don't how to even begin to
5 know -- it certainly could help, you know,
6 explain the P [REDACTED] side of it, but I
7 don't -- I mean, we've had Ms. Ligons'
8 testimony about why she was involved, what she
9 was doing, who she contacted as a result.

10 **MS. POLVI:** Well, I would say that, you know, the
11 content within the document seems quite clear,
12 you know, in terms of specific dates and times
13 that are documented here that seem
14 contemporaneous with the events as they
15 occurred in terms of the Pembertons'
16 recollection.

17 **HEARING OFFICER:** Ms. Polvi, why don't -- instead of
18 entering this, why don't you ask her
19 questions with regard to this?

20 **Q:** With regard to the student who was at Lander
21 who was struggling to pass, I believe, a
22 Spanish-related course, accurate to say that
23 Dr. Slayman relayed to both you and to the
24 parents when you were present that you would
25 know what to do and that she was deferring to



1 your decision on the matter?

2 A: Okay. I had two conversations with Dr. Slayman
3 about this situation. As I indicated, the
4 first conversation I was making her aware the
5 request had come to me from the parents and the
6 principal, and I was letting her know that I
7 contacted the school psychologist that had done
8 the evaluation assessment. We had done a
9 review of his records. We had looked back and
10 seen that the student had taken two foreign
11 language classes and had scored average grades
12 with accommodations and passed those classes.
13 And we had nothing in the assessment where a
14 school psychologist could write a statement or
15 that the student had a disability in Spanish or
16 a foreign language.

17 And I, as I said earlier, contacted the school
18 for the parents because they made me aware and
19 the student made me aware they had not accessed
20 the disability program afforded to him, which
21 would have been -- he had to do that. No one
22 else could do that for him at the university
23 level. And so I asked Ms. Shannon what she
24 needed, and she stated she needed a letter, and
25 we provided that letter. And the second



1 conversation with Dr. Slayman, I was explaining
2 what we had already done.

3 Q: And Dr. Slayman did, indeed, support your
4 decision in what was to be done with regard to
5 the student, former student?

6 A: I didn't feel that support. I felt like she
7 wanted me to send the letter and was still
8 asking me to send the letter, even though I had
9 explained why we could not send the letter.

10 Q: So if the parents indicated that Dr. Slayman
11 was supporting your decision on the matter,
12 would you agree or disagree with them?

13 A: -- They never told me that. -- I've never heard that
14 from them.

15 Q: And at no time was the action taken that was
16 contrary to what you had advised Dr. Slayman
17 needed to be done?

18 A: Ask that question again, please?

19 Q: Is that Dr. Slayman didn't reverse any of your
20 decision, did she?

21 A: Not to my knowledge. I had no further
22 discussion or contact after that last meeting.

23 Q: And the other matter that you indicated that
24 you were concerned about related an allegation
25 of not providing special education services.



1 Do you recall that testimony?

2 A: Not providing special education services?

3 Q: That there was some kind of -- I think you
4 referenced, I believe, in your testimony at
5 some point you had asked, well, do I need to
6 get a lawyer about this? That's the one I'm
7 referring to.

8 A: Yes. I asked if I needed -- because she
9 said -- she alluded that the parents were
10 getting an attorney.

11 Q: And the South Carolina Department of Education
12 was notified by the parents about the concern,
13 were they not?

14 A: I have no knowledge that the State Department
15 of Education was -- his FAPE was through. He
16 had received public education. The parents
17 never told me they contacted the State
18 Department of Education.

19 Q: Did you not receive communications from Wanda
20 Davis? This was a different matter than that
21 one.

22 A: Did I receive communications from Wanda Davis
23 about this particular student?

24 Q: No. This is a different matter. I was asking
25 about the other matter that you said, you know,



1 do we need to obtain a lawyer about. There was
2 two that you've testified about earlier. So I
3 was transitioning from the one regarding the
4 Lander P [REDACTED] and another about special
5 education services but different student.

6 A: Which student?

7 Q: I'm happy to refresh your recollection.

8 **MR. WINBURN:** Tell us what you're handing her.

9 **HEARING OFFICER:** This is the beginning?

10 Q: Is that -- that's -- only document that I'm
11 showing you is one. Those are my other notes.

12 A: This one? Okay.

13 Q: It's is ---

14 **MR. WINBURN:** What are you showing her?

15 **HEARING OFFICER:** It's something -- it's not an
16 exhibit, but it's someone -- you can always
17 have a document to refresh someone's
18 recollection. If she's testified about the
19 event ---

20 **MS. POLVI:** I should be able to look at it.

21 **HEARING OFFICER:** What event did she testify to that
22 we're talking about.

23 **MS. POLVI:** The event where she said -- you
24 testified earlier about to -- an event where
25 you asked, do I need to get a lawyer.



1 **MR. WINBURN:** That was ---
2 A: That was in reference to the student from --
3 this student (indicating).
4 **HEARING OFFICER:** I only recall one instance ---
5 A: I've not been asked about any other student.
6 **HEARING OFFICER:** --- that she's testified to.
7 Am I correct about that?
8 **THE WITNESS:** Yes. The only ---
9 **MR. WINBURN:** Yes.
10 **THE WITNESS:** --- instance is just this student.
11 Q: Okay. Well then ---
12 **THE WITNESS:** After that about any other student.
13 I'll be glad to look at this.
14 Q: Well, then if that's what you've already
15 testified to, we don't need to -- so was there
16 only one instance where you feel, in your
17 testimony, that Dr. Slayman made you
18 uncomfortable in any kind of way, and is that
19 the P [REDACTED] Lander issue that you've already
20 testified about?
21 A: Well, this is the one that I felt I was being
22 asked to do something unethical and I felt very
23 uncomfortable.
24 Q: And when another issue was brought to your
25 attention at some point, did Dr. Slayman not



1 tell you don't worry; you followed the law and
2 that she would support your decisions with
3 regard to special services?

4 A: I didn't get to finish reading that. But as I
5 said earlier, when an issue came up with a
6 principal, a parent, or anything like that --
7 that's generally when I was called to her
8 office -- we would discuss it, or I would
9 research it and take care of it, whatever
10 needed to be done.

11 Q: And do you recall receiving an e-mail from
12 Dr. Slayman in which she said, you followed the
13 law, that she supported you?

14 A: I do not recall that. You showed it to me. I
15 didn't get to read all of it. But, no, I don't
16 recall that. I'm not saying it didn't happen.
17 I just don't recall that particular incident.

18 Q: Accurate to say that during the time period
19 that you and Dr. Slayman worked together, you
20 had a generally positive working relationship?

21 A: Yes.

22 Q: And that she supported you in the position that
23 you held?

24 A: Yes.

25 MS. POLVI: Those are all my questions.



1 **MS. LIGON - EXAMINATION BY THE HEARING OFFICER:**

2 **HEARING OFFICER:** Is it Dr. Ligon or ---

3 A: No.

4 **HEARING OFFICER:** Okay. Ms. Ligon, I just have a
5 couple of questions.

6 A: Okay.

7 **HEARING OFFICER:** This particular student had had an
8 IEP back in middle school or grammar school?

9 A: Probably since elementary school.

10 **HEARING OFFICER:** Since elementary. And so was that
11 true all the way through high school as well?

12 A: Uh-huh, uh-huh.

13 **HEARING OFFICER:** So I know that with IEPs, you
14 normally evaluate every year; is that correct?

15 A: Well, the teacher does to develop the annual
16 goals, and the reevaluation comes every three
17 years with the school psychologist if one's
18 deemed necessary. If it's not deemed
19 necessary, then you don't need to do a
20 reevaluation. Everyone agrees the child still
21 has a disability and is in need of special
22 education services and it continues.

23 **HEARING OFFICER:** Okay. And so if a student had a
24 special need with regard to foreign languages,
25 what would that -- tell me what that would be.



1 A: Well, that was in -- once it became a question
2 for us and we started looking at the assessment
3 that we had done, you know, there is research
4 out there that indicates -- and there's more
5 research out there going on, so I'm not an
6 expert, and I'm not trying to pretend to be.
7 And when we looked at the research that was
8 available about learning disability in a
9 foreign language ---

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

11 A: --- we looked at some journals and researched
12 it. And there is not a specific evidence that
13 there is a learning disability in a foreign
14 language. It's talked about. It's mentioned.
15 But the evidence, at that point in time, that
16 we could find did not support it. And what we
17 saw was this student was passing the
18 requirements of high school ---

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

20 A: --- with the two foreign language -- with the
21 accommodations that he was afforded. And it
22 was just encouraging him and the parents for
23 him to access those same services at the
24 university that were available. And with those
25 accommodations, you know, we don't know, but he



1 may have been able to better with those
2 accommodations.

3 **HEARING OFFICER:** So when a student graduates from
4 high school and he's had these accommodations
5 all along, does the school normally send
6 something to the university or college?

7 A: No, we do not. That is not -- we're not
8 allowed to do that. What we do in our district
9 is we provide our students -- over the course
10 of their high school, we begin to train them.
11 When you leave here ---

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

13 A: --- whether you're going to technical school,
14 community college, two-year, four-year, you
15 know, some kind of training, we begin to teach
16 them how to advocate for themselves. And we
17 tell them that, you know, when you get to the
18 next level, it's not called an IEP. It becomes
19 a 504 accommodation plan. This is how you
20 access it. I don't know if this particular
21 student went, but we do success tools, college
22 day. We encourage parents of the students to
23 go, but our teachers train our students, and it
24 is the student's responsibility to access that.
25 It would be inappropriate for me and even the



1 parent. They will not take it from a parent.
2 It has to be a student. They're of age.

3 **HEARING OFFICER:** So at that point, would the
4 student then go to the college disabilities
5 department, and would they -- would that
6 college or university then assess their needs?

7 A: They can. Sometimes they'll accept where it's
8 coming from. 'Cause we give our students a
9 copy of what they need to access it and tell
10 them this is what they can use to go knock on
11 the door. We give -- we try to find out what
12 college or -- they're going to and then find
13 the name of the person. But, yes, if they
14 don't have current information where the
15 university or college would give to them, then
16 they would assess them. And this was told to
17 this particular student and their parents that
18 had they said our information was too old,
19 Ms. Shannon had told me that they would be glad
20 to assess this student and determine
21 accommodations.

22 **HEARING OFFICER:** So were you actually -- and I know
23 nothing about this, so you have to educate me.
24 You were saying that this child had been
25 assessed the last time in like elementary



1 school?

2 A: I apologize. I don't have the record but ---

3 **HEARING OFFICER:** That's okay.

4 A: But I'm thinking it was upper elementary school
5 or early middle school since the last time we
6 done a full comprehensive psychoeducational
7 evaluation.

8 **HEARING OFFICER:** And you're not required to do that
9 again throughout his high school ---

10 A: We're required to address it every three years.
11 And when you address it, the team can determine
12 many different things. You can determine that
13 a comprehensive reevaluation is necessary.

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

15 A: It may be that you need to know if the student
16 still has that disability or may need some
17 other kind of related or supplementary services
18 to support them.

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

20 A: It could be that you do part of an
21 reevaluation. It may be that -- for example,
22 you know, math, you know, we need to do some
23 additional assessment in math. So you can do
24 all, part, or none. And if you choose none,
25 you're saying we need no further information in



1 order to determine that this child still has a
2 disability and is in need of specialized
3 instruction and services.

4 **HEARING OFFICER:** So ---

5 A: That would have been his case. We would have
6 had a reevaluation.

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

8 A: And it would have -- a team would have, you
9 know, visited and determined that they did not
10 need to reevaluate him.

11 **HEARING OFFICER:** Okay. So one thing that would
12 have led you to that conclusion is with using
13 whatever current accommodations he had at that
14 time, he was doing okay with grades?

15 A: Correct. You're looking at the progress that
16 he's making ---

17 **HEARING OFFICER:** Right.

18 A: --- on his IEP goals, you know, state and
19 district testing. You're looking at a
20 multitude, teacher and parent input, student
21 input.

22 **HEARING OFFICER:** Okay. So if you've got a student
23 that's on an IEP like that and you get to --
24 down to his last year, his senior year, y'all
25 would not normally do a evaluation on him



1 knowing that he may go to college and he may
2 need that? Y'all would not do that if it was
3 not otherwise prescribed?

4 A: We're not required to do that because, you
5 know, again, the purpose is to determine
6 eligibility and services and ---

7 **HEARING OFFICER:** Right.

8 A: --- we have had parents and students ask us to
9 do that. And we're here to try to assist the
10 students, and so we have done that ---

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

12 A: --- to maybe update for a student.

13 **HEARING OFFICER:** Sure. But these parents didn't
14 request that you do that?

15 A: No.

16 **HEARING OFFICER:** Okay. All right. That what I
17 wanted to know. Thank you. That's all I have.
18 Anything further?

19 **MS. POLVI:** All I have.

20 **HEARING OFFICER:** Okay. Thank you, Ms. Ligon.

21 **(Witness excused.)**

22 **(Off the record.)**

23 **JOHN MARK STIVER,** having been duly sworn, testifies
24 as follows:

25 **MR. STIVER - DIRECT EXAMINATION BY MS. POLVI:**



1 Q: Good afternoon, Mr. Stiver.
2 A: Good afternoon.
3 Q: We just shook hands ---
4 A: Yes.
5 Q: --- a few moments ago, but I just want to
6 introduce myself. I'm Shannon Polvi, an
7 attorney at Cromer, Babb, Porter & Hicks. I'm
8 representing Dr. Slayman.
9 A: Right.
10 Q: We're here with regard to a disciplinary
11 proceeding with regard to her educator
12 certificate related to employment with the
13 Chester County School District. And I
14 understand that you have worked with
15 Dr. Slayman during the time period where she
16 was a superintendent with that school district?
17 A: That is correct.
18 Q: And before we get into more of the knowledge
19 that you have related to that time fame, I want
20 to get a little more background to be able to
21 give the hearing officer, Ms. Pike, an
22 opportunity to know more about you. So what's
23 your background in the education field?
24 A: Got approximately 39 years in education both as
25 a teach, coach assist, principal, middle school



1 principal, high schools principal, director of
2 secondary education, and also technology
3 consultant. And I've -- we've worked in five
4 different school districts and just being
5 involved in education for my entire life.

6 Q: And what is your current position in the
7 education field?

8 A: Retired.

9 Q: And what was your last one before your
10 retirement?

11 A: I -- the last close to full-time job that I had
12 in retirement was in Chester County. I served
13 as a consultant, but I did work full-time in
14 Kershaw County as the director of secondary
15 education.

16 Q: And how long did you serve in the director of
17 secondary education position?

18 A: Six years.

19 Q: How long have you been a administrator with
20 school districts in total?

21 A: 30-plus years as an administrator. I'd have to
22 sit there and count that out, but it's over 30
23 years.

24 Q: So I want to ask you about the time period
25 where you consulted -- was a consultant with



1 the Chester County School District. How long
2 was that time period?

3 A: Actually, there were two separate contracts
4 with the school district. One, I was asked to
5 do they technology audit for the school
6 district in 2013, and I think that was over a
7 three-month period. I might be off a month,
8 but I believe it was March, April, and May. At
9 the -- once I turned that audit over to the
10 school district, then Dr. Slayman had asked
11 me -- she felt that there was not anybody in
12 the school district that could do that, and she
13 asked me and I consented to working a part-time
14 schedule to put in the technology.

15 Q: In this time frame, would you say a total, give
16 or take, year, year and a half?

17 A: I was there one year at least three days and
18 week, and then I came back a couple time the
19 following year to follow up on a couple of
20 things.

21 Q: During the time frame that you were a
22 consultant, did you work closely with the
23 senior administrative staff with the school
24 district?

25 A: I had to. I was consulting and came in and,



1 you more or less, don't have a choice. You
2 worked with who's there so, yes, I did work
3 with a number of them, some of them more than
4 others.

5 Q: The allegation that's pending with regard to
6 Dr. Slayman relates to allegations of a hostile
7 work environment. Did you ever observe
8 anything that you would describe as Dr. Slayman
9 subjecting individuals to a hostile work
10 environment?

11 A: No. And I will tell you that I was involved in
12 the cabinet probably that year. Dr. Slayman
13 involved me in the cabinet, so I was part of
14 the cabinet. I think I met every time almost
15 they met. I -- there was no hostile
16 environment in that at all. Everybody had an
17 opportunity to share. She said what she wanted
18 done, and everybody went about their business.
19 I saw no problems there. Also I had attended
20 every principal administrator meeting during
21 that year. And I presented a number of times.
22 There was never really a conflict, not with the
23 superintendent. I did get challenged. The
24 technology director challenged me after I had
25 a teacher present something, and we had words



1 in front of the administrators. And after it
2 was over, Dr. Slayman called both of us in the
3 office and talked with us. But there was no
4 hostile environment. It was what the
5 expectations that both of us had. We had to
6 work together, which we did. And that was
7 really the end of that.

8 But also let me share with you. I met -- also
9 was in a number of parent meetings and a number
10 of student meetings and, there again, was none
11 at all. In fact, just as a follow-up, you
12 know, I eat lunch. There were several
13 administrators plus Dr. Slayman and myself out
14 of the district office that ate lunch either
15 once a week or, you know, a couple times over
16 a week, you know, week or two period. So I
17 never observed any hostile environment at that
18 time.

19 Q: And did you work with Charles King during the
20 time frame you were the consultant?

21 A: I did.

22 Q: And did you ever observe Dr. Slayman treatment
23 him in a hostile environment?

24 A: No.

25 Q: Or hostility when you were present?



1 A: I did not.

2 Q: During the time frame that you were a
3 consultant with the Chester County School
4 District, did you work with Anna Stroud?

5 A: I did. She had provided me financial
6 information so second determine the cost of the
7 technology. I did.

8 Q: Did you ever observe Dr. Slayman treat Anna
9 Stroud with hostility?

10 A: No, I did not.

11 Q: Did you work with Jeff Gardner when he was --
12 when you were a consultant and he was employed
13 with the district?

14 A: I did.

15 Q: Did you ever observe Dr. Slayman treat
16 Mr. Gardner with hostility?

17 A: I did not.

18 Q: And did you work with Shawn Williams during the
19 time frame that you consulted with the
20 district?

21 A: Shawn, the personnel director; is that correct?

22 Q: That's correct.

23 A: I mean, there was three years ago. I'm trying
24 to remember names. No, I did not.

25 Q: And with regard, you did work with her though?



1 A: I -- again, I had, as a consultant, I was
2 putting in the technology for all the teachers
3 in the school district and high school
4 students. I had to work with all of them to
5 gain information so that I could get my
6 numbers.

7 Q: Did you work with the public information
8 officer, Brooke Clinton?

9 A: I did. She was a part-time employee like
10 myself. And the answer to your question is,
11 no, I did not.

12 Q: And just to close that loop, did you ever
13 observe Dr. Slayman treating Brooke Clinton
14 with hostility?

15 A: No.

16 Q: During the year, give or take that you were
17 working closely with the senior cabinet with
18 Chester County School District, did anyone come
19 to you of the senior cabinet saying they had
20 concerns about Dr. Slayman?

21 A: The only concern that I heard came from two
22 people, and that was Jeff Gardner and Charles
23 King. And that is they were called to the
24 office frequently. And what happened in the
25 office, I have no idea. That was the only



1 complaint that I heard from them.

2 Q: And did either Charles King or Jeff Gardner
3 talk with you about any proposals to
4 restructure leadership so that they would be
5 advanced?

6 A: The answer is no. But let me follow up with a
7 little bit more information for you. I was
8 there from July 2013 to June 2014. I came back
9 once in August or September and I came back
10 once, I think, in October or November. And I
11 had no other contact with the school district.
12 So the answer to your question is no.

13 Q: During the -- and I'm not sure if I've already
14 asked this. I apologize if it's repetitive.
15 But during the time frame that you have known
16 Dr. Slayman, about how many years has that
17 been?

18 A: 15.

19 Q: And always in a professional capacity?

20 A: Always in a professional and personal capacity.
21 Dr. Slayman and I -- when Dr. Byrd came on
22 board in Kershaw County in 2003, he hired
23 Dr. Slayman from North Central High School as
24 the associate superintendent and hired me as
25 the executive director of secondary education.



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1 And that's where I first met Dr. Slayman.

2 Q: And within that leadership setup, would that
3 have made her your lateral peer or where within
4 the Kershaw ---

5 A: I was a direct report to her.

6 Q: And when you've been supervised by Dr. Slayman,
7 has she ever treated you with hostility?

8 A: We've disagreed at times. I will be -- but the
9 disagreements have been -- we've laid our cards
10 on the table, and we were able to work out a
11 solution. There wasn't anything hostile about
12 it.

13 Q: And based on your extensive time within the
14 education field, is it fair to say that
15 superintendents and their senior cabinet are
16 not always gonna agree?

17 A: I would say yes.

18 Q: And in your experience, if a person -- well,
19 let's use yourself as an example. If you do
20 not agree with your superintendent, how do you
21 approach your superintendent to relay that?

22 A: I schedule a meeting and we sit down and we
23 talk about it.

24 Q: When you've worked with Dr. Slayman over the
25 years, have you ever heard Dr. Slayman use



1 "I'll cut the legs out from under you" or "I'll
2 kill you" in a colloquial sense?

3 A: I do not recall hearing any language like that.
4 And as closely as I worked in Kershaw County
5 with her, if there was an issue, we would --
6 that would have -- because everybody talked in
7 Kershaw County. It's a true statement.

8 Q: With regard to your time working with
9 Dr. Slayman while she was superintendent at
10 Chester County School District, is there
11 anything else important that you think Ms. Pike
12 needs to know with regard to the allegation
13 that Dr. Slayman created a hostile work
14 environment?

15 A: Well, first, I don't think there was a hostile
16 environment when I was there. I have always
17 felt that the superintendent position is a
18 demanding job. Has to deal with all her board
19 members individually and as a group. And there
20 are things that administrative staff is not
21 gonna be aware of. And I got firsthand
22 experience on that. I am currently mayor pro
23 tem of the City of Newton, and we go into
24 executive session and there are things that our
25 staff members do not know. Finance officer's



1 only in there when we have issues about
2 finance; public works, public works. Nobody
3 else is in there but the City manager or
4 assistant City manager, and nothing goes out of
5 that room. And so I, you know, I just I've not
6 observed any hostile work environment and I
7 don't ...

8 Q: And when -- I think you reference naturally
9 probably in 15 years at some point you and
10 Dr. Slayman probably didn't see eye to eye.
11 When you didn't see eye to eye, did Dr. Slayman
12 treat you with what you would consider a normal
13 response?

14 A: Yes. I'll give one example. I didn't feel
15 that we needed to hand tablets out to the kids
16 second semester. I felt we needed more time to
17 do some things. And but we discussed it, and
18 her plan was -- and her plan had been shared
19 with the board -- that they were to go out the
20 second semester. And so we followed that
21 directive and we did what we were supposed --
22 you know, what we needed to do to that make
23 that happen.

24 Q: There's been some question drawn about whether
25 Dr. Slayman had the best interest of the school



1 district, the children, in mind during the time
2 frame that you worked with her at the Chester
3 County School District, did you ever feel that
4 way?

5 A: I did not. I really felt that Chester had a
6 lot of potential to do some things, but I
7 thought there was some principals that probably
8 needed to be woken up a little bit, to get on
9 the ball. I think data analysis was something
10 that really strongly was -- the administrative
11 staff needed to understand. I think that there
12 needed to be more project learning and use of
13 technology. I also think that there needed to
14 be better professional development. And those
15 are things that, while I was there, I witnessed
16 those things happening, and I witnesses
17 ownership. And just to mention, you know, not
18 only did I work with administrative staff, I
19 worked with all the principals and the
20 assistant principals too, because we put -- we
21 did things with technology K12. I have not
22 heard one principal other than Dr. Knox ---

23 **MR. WINBURN:** Objecting to hearsay. He's about to
24 talk -- he's about to provide to the hearing
25 officer.



1 **THE WITNESS:** What? No ---

2 **MR. WINBURN:** Hearsay.

3 **THE WITNESS:** Hearsay?

4 **MR. WINBURN:** Statements that others have made.

5 **HEARING OFFICER:** Did not say this directly do you.

6 **THE WITNESS:** Dr. Knox did.

7 **MR. WINBURN:** Okay.

8 **HEARING OFFICER:** All right. Go ahead.

9 A: Dr. Knox just said he felt that Dr. Slayman was
10 doing a lot of things. But Dr. Knox was the
11 principal of Louisville High School, and he had
12 done a lot of data analysis and provided
13 professional development. But he was the only
14 person -- but he didn't say that in a hostile
15 environment. He didn't say that in a negative
16 way. He just said that was it.

17 **THE WITNESS:** And I understand what you're saying.

18 **MR. WINBURN:** And I'm sorry. I didn't mean to
19 interrupt you.

20 Q: With regard to the consulting work that you
21 did, essentially helping to implement the IT
22 program within the district, how would you
23 describe Dr. Slayman's efforts during that time
24 frame that you observed?

25 A: That I observed. Well, number one, she had



1 done a lot of work with the council with the
2 school board in order to make that happen,
3 because it was an investment. You know, we're
4 talking about a couple million dollars. She
5 had introduced me to the high school
6 principals, and we had several, several
7 meetings with them to go over what was going to
8 happen. We also met with students, had parent
9 meetings, administrative meetings. In fact, we
10 went over things some many times, I believe
11 everybody, you know, really knew what was going
12 on. But I thought that she'd covered all her
13 bases. The key was it's being implemented.

14 Q: With regard to Charles King, Anna Stroud, Jeff
15 Gardner, Shawn Williams, and Brooke Clinton
16 that you've testified that you've worked with
17 at different points, did they ever discuss --
18 and I think other than Jeff Gardner, Charles
19 King you already testified about -- did they
20 ever discuss any intent to file a complaint
21 about Dr. Slayman to you?

22 A: None.

23 Q: During your extensive career in the education
24 field -- or I believe I think you testified
25 you've been five different school districts?



1 A: Yes.

2 Q: Have you ever had the experience where a senior
3 cabinet has filed a complaint about their
4 supervisor?

5 A: This is the first time that I've ever heard it
6 happen. And it may have happened in
7 North Carolina or South Carolina. But to my
8 knowledge, I've never been associated. I have
9 worked for good superintendents; I've worked
10 for poor superintendents; and I've worked for
11 very demanding superintendents. And the bottom
12 line is they hired me to work for them. When
13 they gave me a directive or gave me a job
14 responsibility, I felt it was my responsibility
15 to do that. And if I questioned that, then we
16 had a conversation. And I have done that. I
17 think that's the best way. If you don't
18 talk -- you can disagree, but if you don't talk
19 to the person that gave you a direction and all
20 you do is moan and groan and gripe about it,
21 that's all you do, moan and groan and gripe
22 about it. And nothing ever gets done.

23 Q: And during the time frame that you were with
24 Chester County School District, did you ever
25 have any concerns about Charles King, Anna



1 Stroud, Jeff Gardner, Shawn Williams or Brooke
2 Clinton?

3 A: I thought Brooke was very competent at what she
4 did. I think sometimes she had to put
5 information together very quickly to get it out
6 to people, but that's just nature of the game.
7 Personnel director, Shawn, little bit. But as
8 far as other than making sure I had personnel
9 counts and numbers for what I was gonna order,
10 I didn't have really have any. Dr. King after
11 I wrote 100, 150 pages worth of documentation
12 on the effort to put technology in, he did not
13 read my document and didn't know what I was
14 gonna do. And Mr. Gardner, as far as dealing
15 with the maintenance and those kind of things,
16 he was helpful in getting those things done.
17 Anna, it is hard getting information out of
18 her. I got it, but sometimes it just took a
19 long time to get it.

20 Q: Did you ever hear of Anna Stroud reacting
21 negatively if those concerns were brought to
22 her attention?

23 A: No.

24 Q: And is there anything else that you think it's
25 important for Ms. Pike to know with regard to



1 Dr. Slayman in the time that you've worked with
2 her?

3 A: The time that I've worked for Dr. Slayman is
4 both professional and personally, we've not had
5 a problem. We've been able to work through it.
6 I mean, we've worked through data analysis,
7 technology. We worked through a couple
8 difficult situations with a couple
9 superintendents, but we were able to talk those
10 things out. I've enjoyed my professional
11 relationship.

12 It's not -- when we both got hired, we were
13 given a directive to raise test scores in the
14 district, and we worked very hard to do that.

15 And I know the six years that I was there,
16 we've raised test scores every year in the
17 district. Not all the time across the board,
18 but that's where you have -- you have
19 directions and that tells you what to do, you
20 know. People have an opportunity to inject
21 their ideas, but I had a good, professional
22 relationship with Dr. Slayman.

23 Q: Thank you for coming from North Carolina to
24 give that testimony. And Mr. Winburn is the
25 attorney for the Department of Education, and



1 he may have questions for you.

2 **MR. WINBURN:** I do.

3 **THE WITNESS:** Okay.

4 **MR. STIVER - CROSS-EXAMINATION BY MR. WINBURN:**

5 Q: Dr. Stiver, my name's Scott Winburn -- is it
6 Dr. Stiver?

7 A: No. It's Mr. Stiver.

8 Q: All right. Well, Mr. Stiver, my name's Scott
9 Winburn. I am a lawyer for the Department of
10 Education and just gonna ask you a couple
11 questions. Where was your office in connection
12 with Dr. Slayman's while you were at the
13 district?

14 A: In Chester?

15 Q: Yes.

16 A: I was on the opposite corner. There's two
17 parts of the building. She was on this corner;
18 I was located over here (indicating).

19 Q: Okay.

20 A: Probably about 50 yards if you go as the crow
21 flies.

22 Q: Now, as I understand your testimony, you were
23 there as a consultant, correct?

24 A: That is correct.

25 Q: You were never an employee of the district?



1 A: That is correct.

2 Q: Now, you testified you were there from
3 July 2013 to June 2014?

4 A: That is correct.

5 Q: All right. So 52 weeks. You had a -- did you
6 have a year-long contract or was that ---

7 A: Yes.

8 Q: Did that -- was that subsequent to the
9 three-month contract that you mentioned
10 earlier?

11 A: Three-month contract was separate.

12 Q: All right. So that preceded the July ---

13 A: Yes.

14 Q: --- time period?

15 A: It did. But I wasn't on campus but a couple of
16 times to take care of that.

17 Q: Okay.

18 A: We could get most of our information
19 electronically.

20 Q: All right. Okay. Did you have a secretary or
21 assistant in your office?

22 A: No.

23 Q: I understand your testimony as well, you were
24 there three days a week?

25 A: Approximately three days a week. I can't -- we



1 worked so many days a month. I'd have to go
2 back. That was three years ago, and I ---

3 Q: That's okay.

4 A: I brought my calenders, but we're close to
5 three days a week.

6 Q: All right. So three days a week. Let's just
7 say there are 52 weeks in a year, right?

8 A: Right.

9 Q: You would grant me that?

10 A: I will.

11 Q: Let's take off four weeks, I don't know, give
12 or take. Two weeks Christmas and holidays, you
13 talking about 48 weeks. Three days a week,
14 that's 80 days; do you agree with that?

15 A: That's probably pretty close.

16 Q: Sound about right.

17 A: Yes.

18 Q: So the school year's how many days, 180?

19 A: 180 days.

20 Q: All right. Employees have to be there, whether
21 you're a teacher or -- I don't know. It's --
22 and I forget -- 190, 200. I can't remember?

23 A: You've got 190, 200, 210, 225, 235. And there
24 are ---

25 Q: There you go.



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1 A: You know, it just depends on what your job is.

2 Q: Right. Do you know what the senior staff would
3 have been, what their contractual requirement
4 would have been?

5 A: Well, I didn't ask them. But, yeah, I -- they
6 were there every time I was there most of the
7 time.

8 Q: All right. So 80 days. You were there 80
9 days. Does that sound about right?

10 A: I'm -- you know, I think it's arbitrary, but it
11 will work for our discussion.

12 Q: Okay. Right. And just for the benefit. And
13 I also heard you testify two different ways.
14 One, you said it was not a hostile work
15 environment. But -- let me finish my question.

16 A: Okay.

17 Q: You also said I never observed any hostile work
18 environment?

19 A: That is correct.

20 Q: So is it more accurate to say I never observed
21 any hostile work environment?

22 A: I think it's more accurate to say that I did
23 not observe a hostile work environment.

24 Q: Okay. All right. And I understand your
25 testimony, you have known Dr. Slayman for about



1 nine years professionally?

2 A: Actually, well, I've known her for 15.

3 Q: Okay.

4 A: But six, seven, be about seven, seven and a
5 half maybe eight years professionally.

6 Q: All right. Are you doing any consulting now?
7 I know you retired.

8 A: No. When I left Chester County, that was my
9 third retirement. It was time to call it
10 quits.

11 Q: Okay. Would you -- how would you describe, if
12 you can, the political environment in Chester?
13 Was it a harmonious board, or was it a
14 contentious political environment as it related
15 to the school board?

16 A: That's a question that -- it requires just an
17 opinion?

18 Q: Sure.

19 A: Okay.

20 Q: Yeah.

21 A: I didn't want to be arbitrary and capricious,
22 but okay. As far as the school board is
23 concerned, I don't know the discussions that
24 Dr. Slayman had with the school board except
25 dealing with technology and how it could be



1 funded.

2 Q: Right.

3 A: Other discussions that were going on in the
4 school board, I could tell you I don't know,
5 because we never discussed them. And we
6 shouldn't have discussed them. As far as
7 Chester County in general, yes, I would say
8 that I observed that there were probably some
9 political issues that were going on, but I
10 don't think that they were really personal
11 issues. They're just issues.

12 Q: Fair enough.

13 A: I never thought I'd be a politician. I'm a
14 politician.

15 Q: I heard.

16 A: I understand those issues, okay?

17 Q: I heard, mayor pro tem.

18 A: Yes. It does not matter. You know, I have
19 political issues.

20 Q: Understood. And those existed in Chester just
21 at it would a lot of -- any school board; is
22 that fair to say?

23 A: Yes.

24 Q: All right. Are you here today to speak to
25 Dr. Slayman's character?



1 A: I'm here to -- the answer to that question is
2 probably yes.

3 Q: Okay.

4 A: But I'm here also -- I don't know what all the
5 accusations -- I can assume by the questions
6 that I was asked, I am assume some of them. I
7 do not know all the accusations that's been
8 made.

9 Q: Understood.

10 A: But I'm here to say that I do not -- I was not
11 observant of a hostile work environment while
12 I was there.

13 Q: All right.

14 A: Now, can I add just one thing?

15 Q: Sure.

16 A: I left, other than coming back twice, in 2014.
17 I don't know what happened with those four or
18 five people ---

19 Q: Understood.

20 A: --- during that period of time.

21 Q: Fair enough. And just one more. And I may
22 have to ask my friend here if she has any
23 questions. The work that you were doing
24 implementing technology ---

25 A: Yes.



1 Q: --- which was your recommendations based on the
2 original audit that you performed for three
3 months?

4 A: Uh-huh.

5 Q: Okay. Did that put you out in the schools --
6 all the schools in the district, or did you do
7 your work in one spot?

8 A: No. It put me out dealing with the technology
9 department, every high school principal, every
10 assistant principal. It put me with the middle
11 school and their assistant principals and
12 elementary principals, because there were
13 things that we were doing districtwide. Yes,
14 I did spend a lot of time out in the schools.

15 Q: Out in the field?

16 A: Yes, out in the field. Because if you're not,
17 you're not gon' get it done.

18 Q: Understood. Hang on just for one second. I
19 think that's all I have.

20 A: Okay.

21 **MR. STIVER - EXAMINATION BY THE HEARING OFFICER:**

22 **HEARING OFFICER:** I have just a couple of quick
23 questions. According to Mr. Winburn's
24 question, you said that you were roughly -- you
25 worked three days, a week and that would



1 roughly equate to about 80 days out of the
2 year. And you just testified that, I'm
3 assuming, of that 80 days you were out working
4 with the principals and ---

5 A: Yes.

6 **HEARING OFFICER:** So you weren't in the same office
7 building Dr. Slayman was in those 80 -- all of
8 those 80 days?

9 A: No.

10 **HEARING OFFICER:** You were out working in the other
11 school?

12 A: That is true. I might have started there in
13 the morning or ended there in the day. But,
14 yes, that is true.

15 **HEARING OFFICER:** Okay. How many days would you
16 estimate that you were in the building that
17 Dr. Slayman was in all day long?

18 A: My rough estimate is a third, maybe a third to
19 a little bit less. That would hard. I
20 could -- if I had brought my hard drive, I
21 could have pulled my calenders up and I could
22 have shared -- I could have been exactly -- and
23 I did not work the same three days every week.

24 **HEARING OFFICER:** I see. Okay.

25 A: Most of the time it was Monday, Wednesday, and



1 Thursday 'cause I didn't want to work on
2 Friday. There were times that I did when we
3 were doing that.

4 **HEARING OFFICER:** So roughly -- roughly -- and I
5 know you're -- this is not exact -- so roughly
6 two-third of the 80 days, you would have been
7 out working with the principals?

8 A: I'd have either been working with them or I'd
9 been working in another part of the building
10 with the technology department.

11 **HEARING OFFICER:** Okay. All right. Thank you.
12 That's all I have.

13 A: Okay.

14 **MS. POLVI:** Just one quick follow-up.

15 **MR. STIVER - REDIRECT EXAMINATION BY MS. POLVI:**

16 Q: Did you observe during the time frame that you
17 were at Chester County School District that
18 senior cabinet went to Dr. Slayman if they
19 wanted to address things with her?

20 A: I am not aware because if one went to her, that
21 was an issue between that individual and
22 Dr. Slayman. And professionally, Dr. Slayman
23 would not have shared that information with me.

24 Q: And at cabinet meetings that you were present
25 at, how would you describe Dr. Slayman's



1 interactions with the senior staff?

2 A: I thought it was good. You know, I mean,
3 all -- everything that's happened is more of a
4 surprise to me. I -- you know.

5 Q: Thank you for your time and testimony.

6 A: Okay.

7 **HEARING OFFICER:** Thank you.

8 **THE WITNESS:** You're welcome.

9 **MS. POLVI:** Oh, thank you. I appreciate your time.

10 (Witness excused.)

11 (Off the record.)

12 **HEARING OFFICER:** Ms. Stroman, would you let the
13 court please swear you in.

14 **SANDRA STROMAN,** having been duly sworn, testifies as
15 follows:

16 **HEARING OFFICER:** Ms. Polvi, your witness.

17 **MS. POLVI:** Thank you.

18 **MS. STROMAN - DIRECT EXAMINATION BY MS. POLVI:**

19 Q: Good afternoon.

20 A: Good afternoon.

21 Q: I'll be asking you some questions. I'm an
22 attorney from Cromer, Babb, Porter & Hicks,
23 representing Dr. Slayman. This is a potential
24 disciplinary matter regarding allegation of
25 hostile work environment with regard to



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1 Dr. Slayman. And I understand you have some
2 personal knowledge related to this time frame
3 that's at issue. I'm gonna ask you about some
4 background before we get to that.

5 A: Okay.

6 Q: So how do you know Dr. Slayman?

7 A: Well, I served on the Chester County School
8 Board when Dr. Slayman was our superintendent.
9 And I knew her before that when she was hired
10 as superintendent at -- because my husband was
11 on school board at that time.

12 Q: What were the years of your time on the Chester
13 County School Board?

14 A: I was -- okay. I'll try to remember the time
15 period and make it -- and get it straight. I
16 was appointed to fill out the term of my
17 husband in 2014, and I believe I went on the
18 school board in February of 2014, was when I
19 was sworn in. I then ran for school board in
20 November of 2014. I left the school board --
21 Chester School Board in 2017 because I was
22 selected to be on the Winthrop board of
23 trustees.

24 Q: And that would be Winthrop College?

25 A: Yes. Winthrop University.



1 Q: With regard to the time frame when -- that you
2 filled, the term that your husband had held,
3 what did your husband then do thereafter?

4 A: He was selected to be at the state board of
5 education.

6 Q: During the time frame that you were on the
7 Chester County School Board, about how many
8 years did that overlap with Dr. Slayman?

9 A: About two years, I think. Almost two.

10 Q: And just a little bit more background before I
11 follow up on that is ---

12 A: Okay.

13 Q: What's your background in the education field?

14 A: I'm a retired school teacher, and I worked for
15 the Chester County School District for 25
16 years.

17 Q: With regard to your time frame where you were
18 on the Chester County School Board when
19 Dr. Slayman was superintendent, how would you
20 describe your interactions with her?

21 A: Interactions were very friendly, very cordial,
22 very happy. Dr. Slayman was very innovative.
23 She brought technology to the forefront in our
24 county, and the board as a whole was very
25 pleased with her.



1 Q: Did the board, during the time frame that you
2 sat on it, provide positive valuations to
3 Dr. Slayman?

4 A: Yes. In fact, I think in -- I believe it was
5 April the evaluation of 2015. We had gave her
6 a raise, and she was -- it was unanimously
7 supported and very highly recommended.

8 Q: Up to the time when Dr. Slayman was no longer
9 serving as the superintendent, were you still
10 on the school board?

11 A: Yes.

12 Q: With regard to Dr. Slayman serving as
13 superintendent, did you observe her interacting
14 with leadership within the school district?

15 A: Yes.

16 Q: And how would you describe what you observed?

17 A: What I observed, everybody seemed to be working
18 well together, and everybody seemed happy and
19 satisfied.

20 Q: When did you first find out that some type of
21 grievance was filed with regard to Dr. Slayman?

22 A: The first inkling that I got of any problem
23 with Dr. Slayman, I was actually in Louisiana
24 awaiting the birth of my fourth grandchild.
25 And I got a call from the chairman, Denise



1 Lawson, who said that the -- there was a
2 problem. And she told me that some or -- on
3 the senior staff were going to possibly file an
4 EEOC against Dr. Slayman. And I was absolutely
5 floored. I had no idea.

6 Q: And likely because the birth of the child might
7 help you remember the date, do you recall
8 around what date that was?

9 A: That was August -- well, the child -- my
10 grandchild was born on August 14th, 2015. So
11 it was sometime -- I don't remember if it was
12 after the birth or just before the birth.

13 Q: Was there anything else that surprised you
14 during that conversation with Ms. Lawson?

15 A: Yes. I was completely surprised that anyone on
16 the staff had had anything negative to say
17 about Dr. Slayman, because as a board member,
18 I'd not gotten an inkling of anything that was
19 a problem. And Ms. Lawson told me that she was
20 the same way, that she had not -- she was
21 surprised by the account as well. And because
22 Chester's a very small community and having
23 been in the education system for so long, I
24 knew a lot of people. I knew many people --
25 well, several people on the staff because they



1 were working when I was teaching. In fact,
2 Jeff Gardner was my principal at Chester High
3 School when I was still teaching. And so I was
4 very surprised when I learned that he was one
5 of the ones who had a grievance or a problem
6 with Dr. Slayman.

7 Q: And at the time frame of when you were in
8 Louisiana and you first found out about the
9 type of grievance, were the grievants
10 identified to you as to who was complaining?

11 A: No. It was just some on the senior staff, is
12 what I was told.

13 Q: What happened next after that with regard to
14 these complaints?

15 A: Well, I was -- we were on the way back home
16 from Louisiana -- excuse me -- we were spending
17 the night in Birmingham, Alabama. And
18 Ms. Lawson called me again and she was telling
19 me that it was really bad. It was a really bad
20 thing and that we were gonna have, I believe,
21 an emergency meeting, because as memory serves,
22 I think the regular meeting, I was not there
23 for. So she was gonna have another meeting
24 when I got back home and -- you know, to
25 further talk about the incident.



1 Q: What happened next after that?

2 A: It's a little bit muddled. You know, it's been
3 several years ago now, and I don't remember
4 exactly, you know, which came first. But at
5 some point, we did have a board meeting. It
6 was shortly after I got back home. And I think
7 that was when we were told that it was the five
8 the -- all of the five of the senior staff.
9 And they were still talking about filing an
10 EEOC for -- what's it called? Workplace -- I
11 forgot what they called it. But anyway.
12 Harassment in the workplace or whatever it is
13 that it was called.

14 And when we had the meeting -- I think before
15 we had the meeting, Ms. Lawson called and said
16 that she was going to ask Dr. Slayman to take
17 some time off. I don't remember if that
18 happened while I was in Birmingham, but anyway
19 during that same part of the time, she said she
20 was gonna ask her to take some time off and
21 let's just try to get this settled and see what
22 was -- you know, what this was all about.

23 Q: What happened after that?

24 A: After the meeting I, at that point, was the
25 vice chairman of the board, and Ms. Lawson and



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1 I went to Dr. Slayman's house to inform her of
2 what was going on and that the senior staff
3 had -- were talking about filing an EEOC
4 against her. And Dr. Slayman was visibly
5 shocked by that. And Ms. Lawson continued to
6 say, you know, don't worry; we're gonna get
7 this straightened out. And she said we're --
8 she said, we want you to take this time off
9 because we're gonna protect you. She said that
10 on a number of occasions that she wanted to
11 protect Dr. Slayman.

12 Q: Do you believe that to be true?

13 A: No. I did at the time, but I no longer believe
14 that to be true.

15 Q: And after that meeting that you, Ms. Lawson,
16 and Dr. Slayman had, what happened after that?

17 A: Dr. Slayman did take some time off. The
18 newspapers, somebody evidently had called the
19 newspapers, and they were asking questions, and
20 Ms. Lawson continued to say that Dr. Slayman
21 was just taking some vacation time. And in the
22 meantime, we met with attorneys from Childs &
23 Halligan attorneys. They were representing the
24 school board at that time.

25 They -- I asked the question if Dr. Slayman was



1 not -- if she did not come under the -- under
2 Childs & Halligan as a de facto board member,
3 and they said, no, she would have to get her
4 own attorney. That was at some point in time
5 during the discussion with the attorneys. And
6 they kept talking about -- I remember Allison
7 Hanna was saying about the EEOC and that we had
8 to investigate it. Once a EEOC complaint was
9 charged, then we had to have an investigation.
10 And so I asked the question, you know, about
11 how did this meet the EEOC because in the
12 meantime, I had looked up on the Internet.
13 Also my daughter is an attorney, and I called
14 her and asked her what EEOC, you know, what the
15 thing was that. And so, you know, she told me
16 about it, and anyway I got on the Internet and
17 I read about it. And I didn't see with the
18 five of them how it could be an EEOC complaint.
19 So I questioned that to the attorneys, and we
20 were gonna have a meeting shortly afterwards.
21 And we were gonna bring Dr. Slayman back
22 because we just said it did not meet the
23 requirement for EEOC. And then in the meantime
24 they said that we needed to investigate. And
25 so I said great. I said we're gonna get



1 somebody from SLED to come investigate. And
2 she -- and Allison Hanna said, oh, no, no, no.
3 We have superintendents who do that kind of
4 work.
5 And so they gave us three named, but they
6 highly recommended that Betty Bagley come and
7 do the investigation. And I then asked would
8 the five people be put under oath as they were
9 questioned, and she said no that won't happen.
10 It's just -- this is just, you know, an
11 in-house kind of thing and they won't be put
12 under oath. And she said I certainly -- she
13 said, I wouldn't expect that five members of
14 the senior staff would lie. And I said, well,
15 people lie all the time. And since they're not
16 gonna be placed under oath, they really don't
17 have any reason not to.
18 But anyway, we went around about that. And
19 so -- and also during this time, I kept telling
20 Ms. Hanna, and then later on Bick Halligan, I
21 just did not believe the charges 'cause I had
22 seen nothing prior to, you know, the point that
23 I got the phone call. And as I said, having
24 known so many people that work in the district,
25 I feel like that I would have been called or



1 somebody would have taken me aside and said,
2 look, this is happening in the district office.
3 Didn't hear a word.

4 The prior superintendent, when my husband was
5 on the board before Dr. Slayman was hired, he
6 did things a little differently. And, I mean,
7 we heard from day one -- or he heard from day
8 one from the staff and everybody that, you
9 know, that this man was odd. And so he
10 eventually left. I mean, he didn't serve out,
11 I don't think, quite a whole year before he was
12 terminated. But so I'm just saying that
13 because how quickly we heard about how he was,
14 unorthodoxed in things that he did. Never did
15 we hear a word about Dr. Slayman.

16 Q: And around this time frame when Betty Bagley is
17 brought in, tell us more about how Ms. Bagley
18 was even hired by the district to perform any
19 type of investigation.

20 A: She was recommended by Childs & Halligan. They
21 brought three names. I don't remember the
22 other two. But they steered us to Betty
23 Bagley.

24 Q: And what knowledge do you have about her
25 investigation methods?



1 A: My husband was an investigator with the
2 South Carolina Department of -- DHEC. It's
3 just -- it's hard to remember. Environmental
4 control. He's a pharmacist, but he was also --
5 had statewide police duties, and he did a lot
6 of investigating for people who committed
7 forgery and that kind of thing for
8 prescriptions.

9 Q: With regard to Ms. Bagley, when she was
10 retained for services of some type of
11 investigation, was there any contact with the
12 board about hiring her?

13 A: I don't understand the question.

14 Q: Sure. Is -- how did Ms. Bagley get hired?

15 A: I'm not really quite sure. We did vote. I
16 think we voted that -- well, I don't think we
17 voted actually. I think it was just a
18 consensus during executive session as well as
19 I remember. I don't think we took a vote out,
20 but it was consensus that we would allow Childs
21 & Halligan to contact her and get her to
22 investigate.

23 Q: Was there any instruction on that investigation
24 should be confidential within the district?

25 A: Yes, yes.



1 Q: And tell us about that.

2 A: As well as I remember, I don't remember
3 exactly, you know, the words of the
4 conversations, but I was a bit leery of that
5 because, you know, I didn't -- number one, I
6 didn't know who she was; number two, I really
7 did not believe the allegations; and number 3
8 they would not be put under oath. And I just
9 felt a bit uneasy, so I asked them would this
10 be a workplace document, you know, that would
11 be maintained within the law firm that some
12 point -- in time I ask asked one of them -- it
13 must have been Ms. Hanna, and she said, yes,
14 this would not be for public consumption. It
15 would just be for our investigation.

16 Q: Did any of the grievants speak with you in
17 terms of the board?

18 A: No.

19 **MR. WINBURN:** May I -- can we go off the record just
20 for a second?

21 **HEARING OFFICER:** Yes.

22 (Off the record.)

23 Q: So we'll pick up related to the grievances that
24 were pending. Prior to Anna Stroud, Charles
25 King, Jeff Gardner, Brooke Clinton, and Shawn

