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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM THE ADMINISTRATIVE LAW COURT

S. Phillip Lenski, Administrative Law Judge

Case No. 2020-000950

Dr. Agnes Slayman Appellant

v.

South Carolina Department of Education Respondent.

RECORD ON APPEAL - VOLUME IV

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- 1 Williams filing a grievance, had any of them
2 ever spoken to you about any concerns about
3 Dr. Slayman?
- 4 A: No.
- 5 Q: And had you interacted with them prior to their
6 grievance?
- 7 A: Yes. But not a great deal.
- 8 Q: With regard to what's been kind of known as the
9 Bagley report, what opinion do you have about
10 the information that was given to you?
- 11 A: As I stated, I didn't believe the Bagley
12 report. I didn't believe that Dr. Slayman had
13 said and done the things that was reported in
14 the Bagley report. It appeared to me that some
15 of the things that were said there has been
16 taken out of context, some of the things that
17 were in the Bagley report. Like when
18 Dr. Slayman was in Idaho and the thing that was
19 said about her being a racist, nothing could be
20 farther from the truth. And she had told me
21 how beautiful she thought Idaho was and she had
22 commented -- made those comments but not in the
23 context that it was reported in the Bagley
24 report. The context was completely different.
- 25 Q: What was that context?



1 A: Well, she talked about beautiful Idaho was, how
2 clean the air was, how beautiful the sky was.
3 And she said that there were just no people
4 there. And she said there was very little
5 diversity when you look, but she certainly
6 didn't say at that point that, oh, it was
7 heaven. It was made to look like in the Bagley
8 report that she said because there was no
9 diversity there, then that made Idaho heaven.
10 She -- when she talked to me about Idaho, she
11 said she just couldn't believe that, number
12 one, it was so sparsely populated and that
13 there was hardly anybody in the airport. And
14 I remember her saying that, you know, just the
15 vastness of the territory and it was just --
16 she said it looked like it could be close to
17 heaven, or something to that effect. But it
18 certainly didn't have anything to do with the
19 fact that very little diversity among the
20 people in Idaho.

21 Q: And there's been some implication, I think, at
22 some point that somehow Dr. Slayman's issues
23 with Sheriff Underwood relate to race.
24 Accurate to say that Andre Williams, the person
25 who was hired for chief of security, he's an



1 African American?

2 A: That's correct.

3 Q: And have you ever heard Dr. Slayman make any
4 statements that would implicate anything
5 against African American employees or
6 individuals generally?

7 A: Never. In fact, I found her to be very
8 supportive of trying to facilitate the African
9 Americans into higher positions and those kinds
10 of things.

11 Q: After you read the Bagley report, what happened
12 next?

13 A: After I read the report -- I'm trying to make
14 sure I don't say anything that was in executive
15 session -- I just said that -- I didn't -- I
16 did not believe the Bagley report. Ms. Bagley
17 presented it to us in executive session. But
18 since it's become public knowledge, I guess I'm
19 okay to talk about it. When she read it -- and
20 she was not supposed to even type it up. She
21 was just -- she brought it to us and she
22 just -- she read. And when I listened to it,
23 she only had comments from the five people who
24 were against Dr. Slayman. She didn't have
25 anything about the other people who worked



1 closely with her. Who were -- saw her on a
2 daily basis. She didn't have anything that
3 would be positive towards Dr. Slayman.
4 Everything was negative from just those five
5 people. She did not go throughout the district
6 office and gather other information.

7 Q: And I believe, you know, the vote itself can be
8 asked about. I'm not gonna ask about
9 deliberations prior to the vote, but fair to
10 say that the school board, as a body, yourself
11 included, did not ever vote to take action to
12 end Dr. Slayman's time as a superintendent?

13 A: No, we did not.

14 Q: And obviously we're here today because a
15 complaint was filed by the interim
16 superintendent Keith Callicutt against
17 Dr. Slayman's license. Were you aware of that
18 complaint being filed?

19 A: No, I was not.

20 Q: Did Dr. -- and, ma'am, I apologize. Is
21 Mr. Callicutt a Mr. or a Dr.?

22 A: He's Dr.

23 Q: Dr. Callicutt. Did Dr. Callicutt have any
24 communications with you as a board body to have
25 permission to file such a complaint?



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1 A: Not with me. If he did, I don't know anything
2 about it.

3 Q: And there was -- you were on the board ---

4 A: I was on the board.

5 Q: --- at the time?

6 A: Yes.

7 Q: So if there had been a vote about it, you would
8 have known about it?

9 A: Certainly.

10 Q: Was Dr. Slayman ever given any type of adverse
11 action by the board during her tenure as
12 superintendent?

13 A: No.

14 Q: There's been quite a bit of reference to the
15 decision to change from security from the
16 sheriff's office to Defender. Were you on
17 school board when the school board voted to
18 make that change?

19 A: Yes.

20 Q: And based on at least your vote, how did you
21 vote?

22 A: I voted in favor.

23 Q: Of the change?

24 A: Yes.

25 Q: And what prompted you to feel that that was the



1 best for the school district?

2 A: Well, even when my husband was on the board, we
3 talked about security in the schools and they
4 had begun to look at other methods in order to
5 provide security in the schools because the
6 county -- you know, Chester's a poor county.
7 And at the time, I think we only had -- earlier
8 I think we only had three resource officers.
9 We have three high schools. We have three
10 middle schools, and we have -- well, it's a
11 total of nine schools. And the elementary
12 schools had no SRO. The middle schools, I
13 think there was one that floated around to the
14 three different middle schools. Chester High
15 School usually had two resource officers. And
16 I think there was one that served between
17 Louisville and Great Falls. I'm not exactly
18 sure how it was, but I know we -- at the time
19 that Sandy Hook happened, we had four resource
20 officers. And I think one of them was just
21 kind of a part-time resource officer.
22 When my husband was on the board as well, they
23 approached county council to see about getting
24 more resource officers. And they just could
25 not afford it. And so we were trying to find



1 the best means in order to secure the schools
2 and make sure that we had some presence for
3 some -- and officer. You know, we never --
4 when resource -- when I was teaching when we
5 hired the resource officers, they were hired to
6 keep fights down from inside the school. And
7 then the whole dynamic changed with Sandy Hook
8 and all the school shootings, and so we decided
9 that we had to do something more than just have
10 resource officers that floated from place to
11 place. And if the sheriff needed them if there
12 was a big wreck out on 77, he could pull the
13 resource officers out of the schools, and we
14 would be left with nothing.

15 Chester High School has, I think, 58 entry
16 doors, and it's hard -- you know, if there's an
17 officer walking all time, it's hard to keep a
18 tab on everything. So we were trying to look
19 at the most cost-effective way. We discussed
20 it a lot, and I think we had a couple of
21 different companies present. And then in the
22 end, we decided to go with Defender because
23 they seemed to be the best at what they do.

24 Q: And with Defender serving as security, accurate
25 to say that there is a officer in every school?



1 A: Yes.

2 Q: And with Defender in place, does that somehow
3 prevent other law enforcement from being called
4 if they're needed?

5 A: No.

6 Q: With regard to the sheriff's office, were you
7 aware of the sheriff's office publishing ways
8 that weaknesses that they saw with regard to a
9 particular high school or middle school?

10 A: I don't remember.

11 Q: I have some follow-ups about the individual
12 grievants. I want to ask you about Anna
13 Stroud. Were you aware of Anna Stroud serving
14 as the director of finance at the time?

15 A: Yes.

16 Q: And with regard to Anna Stroud, were you aware
17 of a board vote that had frozen her salary?

18 A: Not at the time. But after the fact, I was.
19 I think that happened when my husband was on
20 the board. It happened prior to my being on
21 the board.

22 Q: And had the board ever voted at any other time
23 to change that vote to freeze Anna Stroud's
24 salary?

25 A: Not that I know of.



1 Q: And was the purpose of freezing Anna Stroud's
2 salary because she didn't have the
3 qualifications necessary for the job she was
4 performing?

5 A: That's what I understand.

6 Q: And had the board expressed concern to
7 Dr. Slayman that Anna Stroud was making at or
8 near the salary of Shawn Williams, who was more
9 qualified for her position?

10 **MR. WINBURN:** Objection. Leading.

11 **MS. POLVI:** I could rephrase.

12 **HEARING OFFICER:** Rephrase the question, please.

13 Q: Was there any question about Ms. Stroud's pay
14 in comparison to per peers on the senior staff?

15 A: There was discussion about her salary as to her
16 qualifications that I remember, that she was
17 very underqualified for the salary that she was
18 receiving from us.

19 Q: With regard to kind of audits and financial
20 review during 2015, was there any concerns
21 brought to the board about finances under
22 Ms. Stroud's leadership?

23 A: I don't know if I can specifically say about
24 the finances brought to the board under her
25 leadership except to say that she didn't seem



1 to have a good handle on what she was doing
2 when she brought stuff to the board. She
3 seemed to not be confident, and there were lots
4 of times that the board would have questions
5 that she couldn't answer and that she would
6 have to get back to the board about those
7 questions.

8 Q: Was there any decision about the need to hire
9 a chief financial officer?

10 A: Yes.

11 Q: Was there any discussion about Ms. Stroud
12 filling that chief financial officer role ---

13 A: Yes.

14 Q: --- if it were to be created?

15 A: Yes.

16 Q: And what did Dr. Slayman take -- say to you, if
17 anything, about Ms. Stroud during this time of
18 summer 2015 leading up to the grievance?

19 A: I don't remember specifically anything other
20 than what we had discussed as board members.
21 Again, I don't want to say anything that may
22 have been in executive session.

23 Q: Were there any concerns about if any -- Anna
24 Stroud continuing to be employed in the
25 director of finance role around this summer



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1 2015 time frame?

2 A: The only thing -- well, again that's personnel.

3 **HEARING OFFICER:** Was it in executive session?

4 **THE WITNESS:** You know, I can't really remember
5 whether it was or wasn't. I really don't
6 remember.

7 **HEARING OFFICER:** It's personnel, I'm pretty sure it
8 was.

9 **THE WITNESS:** It may have been.

10 Q: Well, I think it would be fair to say on the
11 record whether or not executive session
12 conversations were about it just as long we
13 don't go into what it was. I think that would
14 safe in terms of ---

15 **HEARING OFFICER:** I think that would probably be
16 safe.

17 **THE WITNESS:** That would be okay?

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

19 A: Yeah. We did discuss Ms. Stroud and -- well,
20 I'll just leave it at that. We did discuss.

21 Q: With Ms. Stroud's husband working with the
22 sheriff's office, was there any concern about
23 her sharing information with regard to the
24 district to the sheriff's office that she
25 wasn't authorized to do?



1 A: I never thought about that. I knew her
2 husband, and my husband knows her husband. And
3 I never -- I've really never thought about that
4 until after all this blew up that that was a
5 possibility that that could have happened. But
6 prior to that, I didn't see it as a --
7 necessarily a problem.

8 Q: And with regard to the five grievants, do you
9 have any personal concerns, not considering
10 anyone else's but yours -- yourself, about what
11 their motives might have been related to making
12 such a complaint about Dr. Slayman?

13 A: I do have ---

14 MR. WINBURN: I'm going to object. This is pure --
15 I mean, this is speculation at this point.

16 MS. POLVI: Speculation would be if she speculated
17 about what others. But her own personal
18 observations, she's testified she knew each of
19 these individuals.

20 HEARING OFFICER: She's asking for ---

21 MR. WINBURN: Sure.

22 HEARING OFFICER: --- her opinion, so she can
23 certainly give her opinion.

24 MR. WINBURN: About who she observed, right. Okay.

25 A: I did have an opinion that there were several



1 that would have ulterior motives for filing
2 this against Dr. Slayman.

3 Q: What were those ulterior motives that you were
4 concerned about?

5 A: Well, I believe one of the individuals -- or
6 maybe two of the individuals wanted her job and
7 they felt passed over.

8 Q: And who were those individuals?

9 A: Dr. King and Jeff Gardner.

10 Q: And accurate to say that Jeff Gardner had
11 applied for Dr. Slayman's job?

12 A: That's correct.

13 Q: And Charles King was the, for a short period of
14 time, the interim after Dr. Slayman resigned?

15 A: For a day or two.

16 Q: With regard to the individuals who initiated
17 the grievance, do you know who was a grievant
18 before the Betty Bagley report and who was
19 after?

20 A: No.

21 Q: Did you know, as a board member, that the
22 security group Defender that was being hired
23 could not arrest prior to them being hired?

24 A: Yes.

25 Q: Did you know that all security were at a



1 meet-and-greet were not all permanent?

2 A: Yes. Dr. Slayman was very -- if I can just
3 say, Dr. Slayman was very good at keeping the
4 board informed about what she was doing and
5 when she was doing it. She called us with
6 almost everything. If there was any change in
7 anything that she had planned, she called each
8 of the board members and told us individually
9 and personally. She didn't do it over e-mail.
10 She didn't do it on text messages. She called
11 us on the phone. And she was very upfront and
12 open when something -- there was the problem
13 with school opening and we didn't have all the
14 officers in place. I can't remember exactly
15 what it was that happened, but she did tell us
16 then with that phone call that -- she said
17 don't worry, we will have officers there. But
18 I'm not sure which ones will be permanent,
19 which ones will not. And she told us, you
20 know, that we would get it ironed out. But
21 school would open with people in place.

22 Q: And for the safety concerns involved, did the
23 board direct that the security contract would
24 be solely between the board and the
25 superintendent?



1 A: I don't quite understand that question.

2 Q: Did the board say that the contract with the
3 Defender should remain confidential?

4 A: Yes, I believe so.

5 Q: With regard to -- let's kind of run through
6 each of the grievants. Were there any
7 performance concerns with regard to Charles
8 King?

9 A: I didn't hear any performance problems. I know
10 Dr. Slayman always talked about what a good job
11 he was doing. He seemed very likable, very
12 personable. He seemed to know what he was
13 doing. So we had not gotten any information
14 that he was not doing his job.

15 Q: And any information with regard to Jeff
16 Gardner?

17 A: The only thing about Mr. Gardner was that he
18 seemed to have difficulty getting his tasks
19 completed. But nothing -- we didn't discuss a
20 lot of -- I mean, we were not brought
21 anything -- any kind of information that would
22 lead us to say that we were gonna, you know,
23 move him or fire him or anything to that
24 nature; no.

25 Q: Any with regard to Brooke Clinton?



1 A: Ms. Clinton, not really. But just noticing
2 some of the things myself -- I was a
3 communications major at Winthrop University
4 back, you know, when we had dial-up phones.
5 But she didn't seem real adept at putting out
6 information properly. I'll just -- you know,
7 there was sometimes things that were put out
8 that had grammatical errors and those kinds of
9 things, and she just didn't seem to quite have
10 a handle on that particular position.

11 Q: And with regard to Shawn Williams?

12 A: I didn't have any idea about Ms. Williams.

13 Q: And any with regard to Anna Stroud?

14 A: None other than what's already been discussed.

15 Q: Did any of the staff within the school district
16 inform you that the grievants were seeking to
17 add additional people to complain about
18 Dr. Slayman?

19 A: Not that I remember.

20 Q: With regard to the senior leadership with the
21 district, had you or any of the board ever
22 expressed concern that any of the senior staff
23 had had facial reactions to things during
24 meetings that you were concerned about?

25 A: I personally did not.



1 Q: You, with your time on the Chester County
2 School Board, how many superintendents did you
3 overlap with with regard to leadership?

4 A: How many superintendents ---

5 Q: During your tenure?

6 A: During my tenure? It was just -- it was
7 Dr. Slayman, Dr. Callicutt was interim, and
8 then Dr. Angela Bain.

9 Q: Based on your interactions with Dr. Slayman,
10 were they at all out of the norm that you felt
11 they should be with regard to her as
12 superintendent?

13 A: No. I thought everything was going along
14 great.

15 Q: And did you ever see Dr. Slayman act in a
16 manner that you felt was hostile?

17 A: No. Never. She was always happy and smiling
18 and laughing.

19 Q: When was the first time that you heard that
20 Dr. Callicutt had filed a complaint with regard
21 to Dr. Slayman?

22 A: It wasn't too long ago. I can't remember
23 exactly. A few months ago.

24 Q: Fair to say that Dr. Callicutt's time as
25 superintendent or working with the district did



1 not overlap with Dr. Slayman's?

2 A: It did not.

3 Q: So he would have had to obtain information from
4 some source other than his own personal
5 knowledge?

6 A: That would be correct.

7 Q: And it was not at the instruction of the board?

8 A: No.

9 Q: And just to be clear, as in, no, it -- that the
10 board didn't instruct or, no, they did?

11 A: The board, to my knowledge, while I was on the
12 board -- and I was on the board the whole time
13 that Dr. Callicutt was there -- we did not
14 authorize him to do anything like that.

15 Q: Was it appropriate for board and district
16 interaction to be through the services of the
17 superintendent?

18 A: I'm sorry. I don't understand the question.

19 Q: It was kind of a confusing question. I
20 apologize. Is it fair to say that the
21 superintendent directly reports to the school
22 board?

23 A: That's correct.

24 Q: And the superintendent is an administrative
25 role over all of the school district?



1 A: That's correct.

2 Q: And so the superintendent, he or she would need
3 to be the person reporting to the district
4 board information?

5 A: Correct.

6 Q: And did Dr. Slayman, during her time when you
7 sat on the board, perform those duties as
8 expected?

9 A: Yes.

10 **MS. POLVI:** Beg indulgence, if we could do a quick
11 break?

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

13 (Off the record.)

14 Q: If you could turn to Respondent's Exhibit 3,
15 it's the largest pack right there the front of
16 you?

17 (Respondent's Exhibit Number 3 was introduced into
18 the record at this time.)

19 A: Which one is it?

20 Q: 3. It's the meeting note -- the school board
21 meeting notes. This pocket of documents
22 relates to board meeting minutes. Do these
23 look familiar to what you've seen?

24 A: Yes.

25 Q: And if we turn to about halfway through the



1 packet, the documents that's dated
2 September 21st, 2015.

3 A: Okay.

4 Q: There's a couple different versions of this
5 document. There's three different versions.
6 Do you recall being sent multiple versions as
7 the meeting agenda for September 21st, 2015?

8 A: Yes, I do.

9 Q: Were those changes related to discussing the
10 grievance filed against Dr. Slayman?

11 A: Yes.

12 Q: And during that meeting that ultimately
13 occurred on September 21st, 2015, fair to say
14 that there was no action taken with regard to
15 Dr. Slayman?

16 A: Correct.

17 Q: And looking at these meeting minutes -- and
18 take the time you need if you need to refresh
19 your recollection -- but accurate to say that
20 there was never a vote by the board to take any
21 action with regard to Dr. Slayman ending her
22 employment?

23 A: That's correct.

24 MS. POLVI: I'd like to enter Exhibit 3 into the
25 record?



1 MR. WINBURN: No objection.

2 HEARING OFFICER: No -- I'm sorry. No objection?

3 MR. WINBURN: No objections.

4 HEARING OFFICER: Okay. So entered.

5 (Respondent's Exhibit Number 3 was admitted into
6 evidence.)

7 Q: Next, I want to draw your attention to Exhibit
8 23. This is a four-page document dated
9 August 30th, 2018. Appears to be signed by
10 you. Is that your signature?

11 (Respondent's Exhibit Number 23 was introduced into
12 the record at this time.)

13 A: Yes.

14 Q: And is this a statement you provided about
15 things related to Dr. Slayman?

16 A: Yes. It's the best of my recollection.

17 Q: And I don't think there's a need to go through
18 each. But accurate to say that they're
19 truthful to the best of your knowledge?

20 A: Yes.

21 MS. POLVI: And I would, maybe just for expediency
22 of time, could I reference, Ms. Pike, to her
23 statement without needing to go through it
24 all ---

25 HEARING OFFICER: Okay.



1 **MS. POLVI:** --- for record purposes?

2 **HEARING OFFICER:** Is there any objection to the
3 statement, Mr. Winburn?

4 **MR. WINBURN:** Well, and again it relates to this --
5 very much the same thing, telling Bick
6 Halligan, telling Allison Hanna. You know, I
7 just don't -- I feel uncomfortable being party
8 to entering this into the record. I just ---

9 **HEARING OFFICER:** Can we redact those parts out of
10 this?

11 **MS. POLVI:** Which parts do you propose?

12 **MR. WINBURN:** Yeah. I mean, it's just full of --
13 and I'm not disparaging the statement, of
14 course, but all I'm saying is, you know,
15 Mr. Halligan said this and, you know, the
16 negotiations of her contract. And I just don't
17 know what this has to -- I don't see the
18 relevance. But mainly my main concern is to
19 avoid an issue of -- I mean, it's her
20 privilege, but it's also the board's
21 privileged, and that's what I'm not sure is
22 clear in my mind.

23 **HEARING OFFICER:** Why don't we do this. Why don't
24 we let Ms. Stroman testify but not with regard
25 to anything that was in executive session or



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1 attorney-client privilege.

2 And then you and Mr. Winburn get together and
3 perhaps you could redact this document such
4 that it would be something that we could place
5 into evidence.

6 **THE WITNESS:** Does -- may I ask a question?

7 **HEARING OFFICER:** Yes.

8 **THE WITNESS:** Does the attorney have the privilege
9 or does the client?

10 **MR. WINBURN:** The board is my concern.

11 **HEARING OFFICER:** Yeah.

12 **MR. WINBURN:** You are not -- you're not the entire
13 board.

14 **THE WITNESS:** Almost.

15 **MR. WINBURN:** And I just don't know the rule on
16 that.

17 **THE WITNESS:** Yeah. I guess -- that was why ---

18 **MR. WINBURN:** I really don't.

19 **THE WITNESS:** That was why I put it in there
20 because ---

21 **HEARING OFFICER:** Well, actually, you know, the
22 attorney also has the privilege. I mean, if
23 the attorney were asked.

24 **MR. WINBURN:** Yes. But I think it can be waived.

25 **HEARING OFFICER:** Yes, it can.



1 MR. WINBURN: Can it be waived ---

2 HEARING OFFICER: Yes, it can.

3 MR. WINBURN: --- the client, absolutely. But ---

4 THE WITNESS: It would have to be the entire board.

5 HEARING OFFICER: Yes.

6 MR. WINBURN: That's kind of what I'm thinking.

7 THE WITNESS: The majority of the board or the
8 entire board.

9 MR. WINBURN: And I honestly don't know the law on
10 that. That's my concern.

11 HEARING OFFICER: I think we can get around this
12 though if we redact this document.

13 MS. POLVI: I'm agreeable. Is it -- I guess,
14 Mr. Winburn, if you just send me a proposal of
15 what you want to ---

16 MR. WINBURN: Sure.

17 MS. POLVI: --- redact, and then we can work it
18 out ---

19 MR. WINBURN: That's fine.

20 MS. POLVI: --- and then resubmit it.

21 HEARING OFFICER: Yeah.

22 MR. WINBURN: And I suspect that she can testify
23 about her rationale and -- on all of that and
24 what transpired globally, but I don't know that
25 we could get into the basically the privileged



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1 stuff that worries me a bit.

2 **HEARING OFFICER:** And why don't we just say for now
3 that we agree to admit Respondent's Exhibit
4 Number 23, subject to the redactions that the
5 two of you agree upon.

6 **MR. WINBURN:** I think that's fine.

7 **MS. POLVI:** That's fine.

8 **HEARING OFFICER:** Okay.

9 Q: So, Ms. Stroman, with regard to -- I want to
10 ask you about kind of the information that you
11 have towards the top of the second page.

12 A: Uh-huh.

13 Q: Okay. After this grievance was filed -- filed,
14 was there -- let me back up. I'll make it an
15 even broader question.

16 How would you describe how Dr. Slayman was
17 portrayed after this grievance was filed?

18 A: It was horrible. It was obvious, as you can
19 read in my statement, someone inside the
20 executive session was talking to people
21 outside. Dr. Slayman was treated -- I've never
22 seen any treatment like that before in my life.
23 She was portrayed as the wicked witch on a
24 Facebook page. It was called county politics.
25 But the only politics ever discussed on it was



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1 the school board. And it was obvious that the
2 things that were put on there, there was some
3 thread of what was talked about in the
4 executive sessions.

5 And it would find its way onto the Facebook
6 page, but it wasn't the whole truth. You know,
7 it wasn't -- of course, you know, you've played
8 the game where you'd talk to people, whisper in
9 their ear. And by the time it gets to the end,
10 it changes. Well, that was kind of what it
11 seemed like was going on. Somebody was telling
12 somebody, and somebody was telling somebody
13 what was going on inside board room.

14 And it was just -- it was the most vicious
15 thing I've ever witnessed on somebody who
16 had -- that, to my knowledge, had never done
17 anything to harm anyone, not personally, not
18 physically. In fact, if anything, Dr. Slayman
19 would always go to bat for people to say, well,
20 one thing I know -- and, again, I hope -- I
21 think these discussions were outside of
22 executive session and just maybe just in
23 conversation -- but to some or one particular
24 member of senior staff who we didn't feel like
25 had the credentials to be doing the job,



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1 several of the board members suggested that she
2 be terminated because she had not lived up to
3 what was signed in her -- she was supposed to
4 go back and get her credentials and she never
5 did. And because she was near the end of her
6 TERI, Dr. Slayman said, well, I would rather
7 not do that. I would rather just let her
8 finish her TERI because I don't want to hurt
9 her.

10 And those are always the kinds of things that
11 Dr. Slayman would say to anybody that --
12 anything that came to us about the staff, it
13 was always, well -- there were other
14 individuals that were eventually moved. And

15 Dr. Slayman didn't really want to move them
16 because she didn't want to upset the apple
17 cart, so to speak. Wanted to wait 'til the end
18 of the school year and maybe do something
19 differently, move people around. She was very
20 cognizant of other people's feelings. That's
21 why when I saw the Bagley report, I was
22 absolutely floored and why I did not believe
23 it. It just was so out of character of what I
24 had seen from Dr. Slayman and if they could put
25 this out and just ruin her life -- it's gon'



1 make me cry.

2 Q: I next want to ask you about Respondent's
3 Exhibit 12.

4 **(Respondent's Exhibit Number 12 was introduced into**
5 **the record at this time.)**

6 Q: This is a news article that refers to the
7 Chester superintendent, Dr. Slayman and a image
8 of her here saying about returning to work.
9 Have you seen that news article before?

10 A: I did.

11 Q: And when we look at the date here,
12 September 16th, 2015, other than the call that
13 Ms. Lawson had to you saying that she was gonna
14 instruct Dr. Slayman to go on vacation, did the
15 board ever vote that Dr. Slayman should not be
16 at work?

17 A: No.

18 Q: So the action to put, if this was such an
19 action, to put Ms. -- excuse me -- Dr. Slayman
20 out of work, it was by Ms. Lawson?

21 A: Yes. And it was done as such as, as I said
22 before, protecting her, letting her take
23 vacation rather than placing her on
24 administrative leave.

25 **MS. POLVI:** And I just move to have Respondent's



1 Exhibit 12 into evidence, not necessarily for
2 the truth of the matter asserted, just as a
3 time line or events as they were occurring.

4 MR. WINBURN: That's fine. No objection.

5 HEARING OFFICER: All right. Respondent's Exhibit
6 12 is admitted.

7 (Respondent's Exhibit Number 12 was admitted into
8 evidence.)

9 Q: Next, I want to ask about Respondent's Exhibit
10 10.

11 (Respondent's Exhibit Number 10 was introduced into
12 the record at this time.)

13 A: Okay.

14 Q: This is a brief news article that was published
15 on September 29th, 2015, stating that the
16 Chester County School Board of trustees will
17 hold a special-called meeting on, Wednesday,
18 September 30th, 2015, at 6:00 p.m. in the
19 executive board room. Purpose of the meeting
20 is to continue discussion of employment
21 grievance, contractual matter related to the
22 former superintendent, receipt of legal advice
23 related to grievance and contractual matter,
24 and discussion of interim superintendent in
25 executive session. Does this put a kind of



1 time marker on when Dr. Slayman had resigned?

2 A: I believe so.

3 Q: And when Dr. Slayman left employment with the
4 Chester County School District, that was a
5 voluntary resignation?

6 A: Yes, it was.

7 MS. POLVI: I'd move to begin for Respondent's
8 Exhibit 10 just for a time marker.

9 MR. WINBURN: I just want to see what it is. I
10 don't -- 10?

11 THE WITNESS: 10.

12 MS. POLVI: Yes, 10.

13 MS. MOORE: Which one is that?

14 MS. POLVI: It's a news article published on
15 September 29th, 2015.

16 THE WITNESS: It includes an advertisement ---

17 MR. WINBURN: I'm not -- I don't know -- okay.
18 Sure.

19 HEARING OFFICER: Okay. Then respondent's Exhibit
20 10 is admitted.

21 (Respondent's Exhibit Number 10 was admitted into
22 evidence.)

23 Q: Next, I'd like to ask you about Exhibit 20.
24 It's a news article published on
25 September 30th, 2015. Indicates the headline



1 states: Chester board votes employee
2 complaints moot. Was the vote that it refers
3 to there a public vote related to the
4 grievances that were filed by the five
5 grievants against Dr. Slayman?

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

8 A: Yes.

9 Q: So did the board take any further action other
10 than to vote that the complaints were moot?

11 A: No.

12 Q: I'd like to ask about the second page, which
13 indicates here it's page 3. But not sure why
14 the other's missing. But actually the

15 pertinent part of what I wanted to ask you
16 about is the third paragraph from the top.
17 Says earlier in the day district officials
18 released to the public a ten-page investigative
19 report detailing allegations made against the
20 former superintendent. Did the board ever
21 authorize any publication of the ten-page
22 Bagley report?

23 A: Never.

24 **MS. POLVI:** I'd like to enter Exhibit 20.

25 **MR. WINBURN:** No objection.



1 **HEARING OFFICER:** All right. Respondent's Exhibit
2 20 is admitted.

3 **(Respondent's Exhibit Number 20 was admitted into**
4 **evidence.)**

5 Q: The last article I want to ask you about is
6 Exhibit 15.

7 **(Respondent's Exhibit Number 15 was introduced into**
8 **the record at this time.)**

9 A: Okay.

10 **HEARING OFFICER:** Exhibit?

11 **MS. POLVI:** 15, one-five.

12 **HEARING OFFICER:** Oh, 15.

13 Q: These are two news articles that -- one's
14 identified as 10:05 p.m. and the other is 10:08
15 p.m. Have you seen those news articles before?

16 A: Yes.

17 Q: Were they related to Dr. Slayman?

18 A: Yes.

19 Q: What was your opinion as a school board member
20 when you saw this news article?

21 A: I was disgusted, because apparently, again,
22 someone who had access to board materials had
23 leaked this to the media. And the way it was
24 written by the editor was -- well, I couldn't
25 believe it. But it just -- again, to think



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1 that, you know, you could put stuff like this
2 in the paper that was never proven, Dr. Slayman
3 didn't have any chance to speak out against it
4 and never did say anything against any of the
5 five people. She never went to the paper with
6 anything. And I believe that she certainly
7 could have but -- well, I'll just leave it
8 there.

9 **MS. POLVI:** I'd like to bring into evidence
10 Respondent's Exhibit 15.

11 **MR. WINBURN:** No objection.

12 **HEARING OFFICER:** Okay. Respondent's Exhibit 15
13 admitted.

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

16 **Q:** We've covered a lot of information during your
17 testimony. Is there anything that's important
18 for Ms. Pike to know that you have personal
19 knowledge about that I haven't asked you about?

20 **A:** Let me think a second. The only thing I guess
21 I would like to say is that between the time of
22 April, I believe it was, and August 1st,
23 Dr. Slayman went from being the best
24 superintendent we ever had to the wicked witch
25 of the west, and that just doesn't happen. To



1 me, it seemed as if this was a mutiny. I pride
2 myself in having common sense. And when your
3 common sense tells you that this just can't be
4 so, you start to look at it. And, again, and
5 I know that you have a problem with me talking
6 about the law firm, but I never felt they
7 represented the board as a whole. I felt that
8 they represented one or two members of the
9 board. And the rest of us were left out of
10 loop. And that we were guided and misguided
11 into doing things that we knew or that we felt
12 in our hearts couldn't be right.

13 Because the majority of the board supported
14 Dr. Slayman. It was four out of the seven.
15 And then one of the three really didn't want to
16 voice an opinion one way or the other. At
17 first, he rejected the Betty Bagley report.
18 But at some point, the other two board
19 members -- well, actually in the beginning,
20 there was six of us that supported her, and
21 that included Ms. Lawson. But I don't know
22 what was said to her. She never confided in me
23 that anything was said to her, but I feel like
24 somebody told her something that was more than
25 likely not true that caused her to change and

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1 be really vindictive and really against
2 Dr. Slayman.
3 Dr. Fort, who's now deceased, of course, he
4 can't speak for himself. But he -- like I
5 said, at first he said I don't believe this.
6 But we were directed. In fact, I put a
7 statement in the paper that I was sorry that I
8 voted to accept her resignation because I felt
9 like that we had been misrepresented by our
10 attorneys. And Bick Halligan e-mailed me and
11 said that he had directed us not to say
12 anything. And at the time I told him, I said,
13 you work for us; we don't work for you. And I
14 was very, very upset with him. And eventually
15 we voted -- the four of us who supported
16 Dr. Slayman, we voted to fire Childs & Halligan
17 because we felt that we had been
18 misrepresented.
19 We didn't have all -- the four of us that
20 supported her did not have the information that
21 the other two had. We never knew, and I still
22 do not know to this day who made the call to
23 the board member, which board member it was.
24 I know it wasn't one or the four of us, and I
25 know it wasn't Dr. Fort. And I don't believe



1 it was Ms. Lawson. I believe it was
2 Dr. Hughes. Still to this day, I do not know
3 who made that phone call. And if I had it to
4 do over again -- you know, you live and
5 learn -- this would have been stopped. It
6 would have been stopped in its tracks. And it
7 would have been, had it been filed as a
8 grievance, and I would have insisted that an
9 outside law enforcement person question these
10 people under oath rather than having something
11 like this that could -- that did ruin
12 Dr. Slayman's career and her life. It's not
13 fair.

14 Q: I have one follow-up with regard to that, if I
15 may. The night, or close to it, that this
16 initial grievance call occurred -- and we know
17 it was some time frame in August 2015 -- wasn't
18 that the same time frame that the next
19 evaluation was supposed to be given with regard
20 to Dr. Slayman?

21 A: Yes.

22 Q: I wanted to ask you about -- there's been some
23 discussion with regard to Dr. Slayman having
24 breakfast with some other community leaders
25 during her tenure as superintendent. Is there



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1 anything wrong with Dr. Slayman getting
2 breakfast with other community leaders?

3 A: I never felt it was a problem. I know two of
4 the men that were in the breakfast club. And
5 I thought that it was good that she was able to
6 go out in the community and talk with community
7 leaders. And I'm sure, knowing Dr. Slayman and
8 knowing how thorough she was and how she would
9 stick to protocol, that she would never discuss
10 anything out in the open with community leaders
11 about things that went on in the school board
12 that were priveleged information. She just
13 wouldn't do that. And I don't know whether --
14 well, I just -- I'll just leave it at that.

15 Q: And additional follow-up, there was some
16 question about the chief of security's salary.
17 Did the board authorize to pay the chief of
18 security in the 60,000 range?

19 A: Yes.

20 Q: And was that a board decision?

21 A: Yes.

22 Q: Those are all my questions. I may have
23 follow-up. But Mr. Winburn has the opportunity
24 to ask you follow-up question as well.

25 **MS. STROMAN - CROSS-EXAMINATION BY MR. WINBURN:**



1 Q: Thank you, Ms. Stroman. My name's Scott
2 Winburn. I am in the general counsel's office
3 here with the Department. I do have some
4 questions. I'm gonna try to go back -- go sort
5 of in reverse order. I want to clear one thing
6 up. It's been a lot of discussion about the
7 Bagley report, who reported what, when it was
8 reported, how it was reported. And I'll just
9 submit to you that our office deals with
10 complaints of unprofessional conduct. And I
11 don't believe I am wrong in this, but our
12 office -- it doesn't matter how we find out
13 about it. Sometimes we find out about cases in
14 the news. Sometimes it can be a letter from
15 someone that is very credible and we
16 investigate those cases. So I just -- I'll
17 just say that to you. I know that's -- it may
18 be halfway improper for me to share that
19 information with you. I just want to make sure
20 that you understand that the witnesses that --
21 or the information contained in this report,
22 there have been -- I don't know -- five or six
23 witnesses who have testified under oath in this
24 case already as part of this proceeding. Do
25 you understand that?



1 A: Sure.

2 Q: Okay. Now, you've testified a minute ago --
3 and I'm trying to quote it -- but I think you
4 testified, to my knowledge, I have never seen
5 Dr. Slayman do anything to harm anyone. Is
6 that ---

7 A: That's correct.

8 Q: That's accurate? Again, to your knowledge.
9 You were testifying about what you observed --
10 what you have observed over time; is that fair
11 to say?

12 A: Yes.

13 Q: All right. Now, you didn't work with
14 Dr. Slayman on a day-to-day basis?

15 A: No, I did not.

16 Q: You did work with Jeff Gardner as a principal?

17 A: I did.

18 Q: Was he a good principal?

19 A: He was pretty good.

20 Q: Okay. All right. Let me ask you this:
21 Discussion about Anna Stroud and that she -- I
22 would just paraphrase your testimony. You
23 understood that she was overpaid; is that a
24 fair statement?

25 A: Yes.



1 Q: You understand that she may have been taking
2 on -- wearing multiple hats as the executive
3 director of finance? Do you understand that?

4 A: Sure.

5 Q: Okay. So you had to hire a CFO. You wanted to
6 hire a CFO; is that right?

7 A: That's correct.

8 Q: All right. So was she serving as CFO, the same
9 function as CFO and the same function as a
10 executive director of finance, if those two are
11 separate in any way?

12 A: I suppose so.

13 Q: All right. So was there a restructuring that
14 you're aware of around 2007, 2008 that related
15 to the recession where positions were
16 eliminated but never refilled by warm bodies?

17 A: I was not on the board at that time.

18 Q: All right. So if it's -- it's possible, basing
19 on what I'm hearing you testify to, that Anna
20 Stroud did wear multiple hats and she was paid
21 as executive director of finance but had
22 other -- served other roles for the district?

23 A: Perhaps.

24 Q: Okay. Keith Callicutt, again, lots of
25 discussion about Mr. Callicutt not -- the board



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1 did not approve of Mr. Callicutt reporting the
2 complaint to us?

3 A: Correct.

4 Q: All right. Now, if a teacher, for example,
5 threatens another teacher, I won't -- I will
6 rip your throat out, does the board -- if that
7 teacher is fired or if that teacher is
8 approached by the principals, like,
9 Ms. Johnson, you can't say that. You just
10 can't do it. We're gotta -- we're gonna have
11 to fire you. Now, if that is then reported the
12 Department, is that something that the board
13 has to approve, in your mind?

14 A: I do not know.

15 Q: Okay. I'd submit to you that it is not. It is
16 my regulation that they are -- those incidents
17 are reported, and we take them very seriously.
18 Been a lot of talk about the Bagley report.
19 I'd like to enter into evidence. And as I
20 understand it, you don't believe the
21 allegations?

22 A: I do not.

23 Q: All right.

24 **HEARING OFFICER:** What's the number?

25 **MR. WINBURN:** It was part of another exhibit. We'll



1 just probably have to renumber it, ten pages.

2 **HEARING OFFICER:** And what -- which one was it part
3 of? Was it one of yours?

4 **MR. WINBURN:** It was part of, I think, Exhibit 13.

5 **HEARING OFFICER:** Of yours?

6 **MR. WINBURN:** Yes, ma'am.

7 **HEARING OFFICER:** Okay.

8 **MR. WINBURN:** Would it be easier just to separate it
9 out since we've separated it already once
10 before? Maybe we ...

11 **HEARING OFFICER:** All right. So I believe we
12 entered 13.

13 **MR. WINBURN:** We entered 13 but less the Bagley
14 report.

15 **HEARING OFFICER:** Okay. All right.

16 **MS. POLVI:** Less the Bagley report and that one page
17 prior to it.

18 **MR. WINBURN:** Yes, yes, yes.

19 **HEARING OFFICER:** Okay. This (indicating)?

20 **MR. WINBURN:** Yes.

21 **HEARING OFFICER:** Okay. So we're gonna leave
22 Charles King's statement as 13.

23 **MR. WINBURN:** Yes.

24 **HEARING OFFICER:** And then we'll renumber this ---

25 **MR. WINBURN:** We'll try to enter that later.



1 HEARING OFFICER: Okay. All right. We'll just take
2 that out for right now.

3 MR. WINBURN: Okay.

4 HEARING OFFICER: And then this is the Bagley
5 report.

6 MS. POLVI: No objection.

7 HEARING OFFICER: Then this will be entered as
8 Petitioner's Exhibit Number 14.

9 (Petitioner's Exhibit Number 14 was marked for
10 identification purposes and admitted into evidence.)

11 MR. WINBURN: Okay. So we are separating it as 14?
12 Okay. Good.

13 HEARING OFFICER: Yes.

14 Q: So and you've read it?

15 A: Yes.

16 Q: Okay. So based on my understanding of what
17 transpired, the superintendent, Dr. Slayman,
18 voluntarily resigned; is that correct?

19 A: That's correct.

20 Q: All right. And she signed a release? She
21 signed documentation -- you know, she signed
22 off on that transaction as far as you know?

23 A: Yes, yes. As far as I know.

24 Q: As far as you know, that's called a voluntary
25 release?



1 A: I don't know what a voluntary release is.

2 Q: Okay. That's fine. But she -- it's not
3 like -- your -- it's your understanding that
4 she affixed her signature to some documents
5 that said I am resigning; I agree; let's go
6 home ---

7 A: Right.

8 Q: --- and call it a day?

9 A: Right.

10 Q: And she -- the board -- the arrangement was
11 that you'll -- that she was paid \$300,000 as
12 part of that transaction?

13 A: That's correct.

14 Q: All right. So once she was -- once she had
15 resigned, is it your understanding that that
16 mooted the Bagley report? In other words, is
17 it your understanding that the board did not
18 really have to determine the merits of the
19 complaint, i.e., the complaint made by these
20 individuals on the senior staff? Does make
21 sense?

22 A: Yes.

23 Q: Okay. So is it fair to say that the board
24 never adjudicated, never determined through
25 interviews, investigations, whether the



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1 allegations contained in the Bagley report were
2 accurate?

3 **MS. POLVI:** I would object to that question. I
4 believe, again, the testimony from earlier that
5 we've heard would be that it's a
6 mischaracterization. Because as we've heard,
7 the grievants all testified, or at least the
8 majority, I believe, did that they did, indeed,
9 present their concerns themselves to the board
10 and had their opportunity to be heard.

11 **MR. WINBURN:** Okay.

12 Q: But the board has never voted to determine we
13 agree with these folks that filed the
14 complaint? But the board never made that
15 determination as part of their business taken
16 up by the board? It was never determined ---

17 A: Are you asking ---

18 Q: --- yes, we're gonna vote. We're gonna vote
19 and say all right. Yeah, more likely than not
20 some of these allegations are true. Y'all
21 never made the determination as to whether the
22 truth or the accuracy of that -- the Bagley
23 report?

24 **MS. POLVI:** Again, I would object. I think, again,
25 the -- even the grievants themselves testified



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1 that they presented and the board voted about
2 this matter.

3 **HEARING OFFICER:** Well, they presented. Did they
4 testify that the board voted with regard to
5 that?

6 **MR. WINBURN:** No, ma'am.

7 **HEARING OFFICER:** I don't -- I didn't hear that.

8 **MS. POLVI:** Ms. Stroman, you can clarify, I guess.

9 **THE WITNESS:** We did not vote. Well, I'll tell you
10 how the moot thing came out and ---

11 Q: Okay.

12 A: I may be talking of school again, but I'm just
13 gonna say.

14 Q: I just want your understanding. That's all
15 right. Not a test, I promise you.

16 A: We wanted to vote that the grievants -- and I
17 can't remember what the term is now but -- was
18 without merit. We did not believe -- the
19 majority of the board did not believe that the
20 grievants had merit.

21 Q: Okay.

22 A: And there were several reasons why. Number
23 one, they didn't follow board policy procedure
24 in the -- in presenting the grievance. They
25 never came to us and talked to us and --



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1 individually or as a group. They never came to
2 the board and told us ahead of time, I guess
3 you'd say, what was going on with Dr. Slayman.
4 It went from a call to a single board member
5 into an EEOC investigation, then was changed to
6 a grievance. And it was -- I told someone it
7 was like we were on a train that we knew was
8 about to wreck, but we couldn't get off and we
9 couldn't stop it. Even though we had the
10 majority of the votes, the ones of us who had
11 experience with -- well, I'll just say the ones
12 of us who never saw anything that would
13 indicate that Dr. Slayman behaved in that
14 manner.

15 Q: Okay.

16 A: And even if all five of them said it, again, I
17 believe it was a mutiny. And, you know, you
18 can get one person that's strong enough and get
19 them five, six, ten people to say whatever.

20 Q: Right.

21 A: And so our attorney talked us out of voting it
22 as it not having any merit because he kept --
23 he said that they could sue the school district
24 if we did. And it was always about suing the
25 school district.



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1 Q: Who suing the school district now?

2 A: Well, now?

3 Q: Yes.

4 A: Yeah. Well, I mean, I'm not on the board now.

5 Q: How many lawsuits does the school district
6 have?

7 A: Well, two. But ---

8 Q: And who are those from?

9 A: Dr. Slayman and Dr. Angela Bain.

10 Q: Okay. Not Keith Callicutt? Not ---

11 A: I'm not -- but I'm not talking about that.

12 Q: Okay.

13 A: I'm talking about the attorney.

14 Q: All right.

15 A: He said he was trying to keep us out of a
16 lawsuit. And so he talked us into just saying
17 it was moot rather than without merit. So
18 that's how we got to the point. We wanted to
19 make a statement that would try to put this to
20 bed so Dr. Slayman could get her life back. I
21 mean, we had agreed -- we voted to give her
22 \$300,000, and that just wasn't -- that wasn't
23 just because we liked her a lot. I mean, that
24 was -- some of us did like her a lot and
25 thought she did a great job.



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1 Q: She wanted to avoid litigation; is that fair to
2 say?

3 A: Exactly.

4 Q: Right.

5 A: We wanted to avoid litigation.

6 Q: Okay.

7 A: We wanted Dr. Slayman to be able to leave. We
8 knew that all this stuff in the paper was going
9 to harm her.

10 Q: Did she sue -- did she sue the paper; do you
11 know?

12 A: I don't know. You'll have to ask Dr. Slayman
13 that.

14 Q: All right... I will... All right... So according
15 to this, this is -- I'm reading from the
16 Chester County School District, minutes of a
17 special meeting with board school trustees
18 district office September 30th. At the bottom
19 it says, on motion of Ms. Stroman, seconded by
20 Ms. James, the board voted unanimously, seven
21 to nothing, to deny the employment grievance as
22 moot. So what is -- so basically y'all just
23 cast it aside seven to nothing that it's moot
24 even though you say, your testimony is four of
25 the seven were ready to say the grievance is



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1 totally inaccurate, the claims in here are not
2 valid?

3 A: That's because our attorney advised us to do
4 that.

5 Q: Okay.

6 A: And unfortunately, we listened to him.

7 Q: And I've got no friends to reward or -- I'm not
8 getting into law firms. And, again, I just
9 share that with you. I just -- I've shared my
10 objection based on the ---

11 A: I understand.

12 Q: --- the -- that legal issue. Okay. So you
13 also testified that Dr. Slayman was very open
14 with you. Never sent you anything in writing
15 but would call you at the drop of a hat?

16 A: Right.

17 Q: I'm paraphrasing.

18 A: Right.

19 Q: Okay. Did she call you about threatening Shawn
20 Williams?

21 A: No.

22 Q: She did not?

23 A: No.

24 Q: Okay. Did she call you and tell you I just
25 threatened Shawn Williams and she came back and



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1 she -- we had a discussion about it after that
2 and I probably shouldn't have done that ---

3 **MS. POLVI:** I would ---

4 **Q:** A conversation like that ever happen?

5 **A:** No.

6 **MS. POLVI:** I would object. Again, it's -- that any
7 such threat -- I mean, the testimony speaks for
8 itself as to what was said. Again, disputed as
9 to any such threats of -- that's assuming
10 things -- several things within the questions
11 that are not in the record.

12 **HEARING OFFICER:** Well, now, wait a minute.
13 Ms. Williams did testify that she was
14 threatened by Dr. Slayman, so he's asking
15 this ---

16 **MR. WINBURN:** I'll rephrase it.

17 **HEARING OFFICER:** --- if she knew ---

18 **MR. WINBURN:** Right.

19 **HEARING OFFICER:** --- of that.

20 **Q:** And I think your answer was you were -- no such
21 conversation -- no such call from Dr. Slayman
22 to you ever took place where she's reporting,
23 gosh, I had this incident come up at work today
24 that I'm ashamed of and I'd like to share it
25 with you?



1 A: No.

2 Q: Nothing like that? Now, you also testified, I
3 believe, that these folks that filed a
4 grievance never came to you as a board member
5 or other members, to the best of your
6 knowledge, and say I've got a problem, I don't
7 know how to deal with it; is that ---

8 A: That's correct.

9 Q: Okay. Now, if I ask you to assume, would it
10 surprise you that there -- if there's been
11 testimony here where Dr. Slayman specifically
12 forbade -- forbid ---

13 **HEARING OFFICER:** Forbade.

14 **MS. POLVI:** Forbade. Thank you.

15 Q: --- her subordinates from communicating with
16 the board, would that surprise you?

17 A: I don't believe that to be true.

18 Q: Okay. Would it surprise you that if there was
19 testimony that, if believed, the witnesses
20 contend that Dr. Slayman often said things
21 like, I will crucify him; I will kill him; I --
22 go rip his head off, would that surprise you?

23 A: Well, my mother used to tell me she was gonna
24 knock my head off ---

25 Q: Okay.



1 A: --- when I misbehaved or if I did something
2 that she didn't like. And I had -- I certainly
3 didn't believe that my mother would actually
4 knock my head off.

5 Q: That's fair. Did your mother follow up by
6 saying I carry -- I've got a CWP?

7 A: Well, she didn't.

8 Q: Okay. Well ---

9 A: She had access to weapons.

10 Q: All right.

11 A: And a fly swatter was one of the worst.

12 Q: I've been hit with a fly swatter.

13 I know you get what I'm driving at ---

14 A: I do.

15 Q: --- is that there -- that these -- I'll submit
16 to you there has been testimony in this case
17 where these individuals have come before
18 Ms. Pike. It's a very difficult job. And have
19 testified about their experiences?

20 MS. POLVI: I object to the form. Is it -- again,
21 we agreed that witnesses would be sequestered,
22 and this is exactly contradictory to --
23 essentially, again, they weren't -- she wasn't
24 here to hear ---

25 MR. WINBURN: I've got ---



1 MS. POLVI: --- what they actually testified to, and
2 he's about to paraphrase testimony.

3 Q: I've got -- the point of my question is: They
4 testified under oath, and you testified that --
5 earlier that you believed the Bagley report
6 couldn't be believed because they didn't
7 testify under oath. And my question is: Would
8 it matter to you if these individuals were
9 willing to come to this event and testify under
10 oath about what they experienced? Would that
11 change your mind at all?

12 A: It depends.

13 Q: Okay.

14 A: Actually, I -- there was one time that I was
15 talking with Dr. Slayman, and she said
16 something to the effect -- now, I'm gonna tell
17 you something, if you tell it, I'll have to
18 kill you. We both laughed.

19 Q: She laughed?

20 A: We both laughed.

21 Q: Okay.

22 A: I certainly knew that she was not going to kill
23 me. And a lot of people talking euphemisms and
24 colloquialisms and all kinds of -isms ---

25 Q: Depends on the circumstances.



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1 A: And it depends on the circumstance. And it
2 depends on the context as well.

3 Q: Right, right.

4 A: I don't believe for a second that Dr. Slayman
5 said I'm gonna kill you and I have a concealed
6 carry permit.

7 Q: Do you know what ---

8 A: She's told me she had a concealed carry permit
9 when we've talked about -- when we were talking
10 about the Defender stuff. And I said, good, I
11 need one. My husband used to do that and but
12 I don't have one. So, you know, to put those
13 two things together is a lot different than
14 saying all right; I'm gon' have to kill you
15 next time. It's the way it was put together.
16 And that's why I didn't believe it.
17 She may have said things to those effects. But
18 out of context, if you read that on a piece of
19 paper, it looks horrible. But if you're there
20 in context, you laugh about it. And I don't --
21 I'm gon' stop.

22 Q: No. That's fine. But you also testified that
23 those individuals making these claims had no
24 reason not to lie if they were asked questions
25 by Betty Bagley and not under oath. Is that



1 your testimony?

2 A: Yeah.

3 Q: They have no reason to ---

4 A: If they have ---

5 Q: --- not to lie?

6 A: Again, I said they may have had and I believe
7 them to have had an ulterior motive.

8 Q: In general, what was that ulterior motive?

9 A: Well, I think Anna Stroud thought she was gonna
10 be fired.

11 Q: Okay.

12 A: And that was a pretty good thought on her part
13 because they were many on the board that wanted
14 her fired. I didn't have enough knowledge at
15 the time that I served on the board to come to
16 that conclusion to when all this started to
17 happen. But, of course, you know, through the
18 course of things, I did hear that Anna Stroud
19 was not -- she didn't have the education and
20 that the reason that they left her in place
21 there was because she promised to get the
22 education that was needed for the job
23 description.

24 And, again, I -- Jeff Gardner, I got along
25 great with Jeff as my principal in high school.



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1 But he was the third candidate and -- before
2 Dr. Slayman was hired. And that was when my
3 husband was on the board and two -- the top two
4 dropped out. They gave him -- it was a
5 courtesy, from what I understand, a courtesy
6 interview, so they would have three people.
7 And he -- I remember that after the other two
8 people had dropped out, Mr. Gardner called a
9 meeting, a faculty meeting. And we were all in
10 the faculty meeting, and he told us that he was
11 most likely going to the district office. And
12 he talked about how much he appreciated working
13 with us and, you know, those kinds of things,
14 that he would miss all of us and hoped that
15 there would be someone good to come in to
16 replace him.
17 And I think he was very hurt when the board
18 decided to reopen the superintendent search.

19 Q: Did you ever have any conversations about him
20 being hurt or feeling hurt, having hurt
21 feelings?

22 A: No. We never had a conversation, but you, you
23 know, you can read people pretty well when
24 you've known them for a while.

25 Q: All right. Now, did Dr. Slayman support the



1 sheriff?

2 A: I don't really know -- I don't really know. I
3 think at first she did.

4 Q: It's a small community?

5 A: Well, Dr. Slayman was new to the community.

6 Q: Uh-huh.

7 A: And Sheriff Underwood was a new sheriff.

8 Q: Right.

9 A: And it's my understanding -- again, I was not
10 on the board at that time when it first started
11 but that she did try to work with Sheriff
12 Underwood with the SROs. I mean, I -- they
13 didn't start off with animosity, but the
14 relationship, as I understand it, broke down
15 with when we decided to hire Defender.

16 Q: And did she allow the sheriff's deputies to
17 train with Defender employees?

18 A: I don't know the answer to that.

19 Q: Well, wouldn't it be important -- I mean, do --
20 you testified earlier that Defender employees
21 don't have guns; they don't have arrest -- I
22 don't think you've testified about arrest
23 powers, but they don't ---

24 A: We knew that.

25 Q: You knew that?



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1 A: Yes.

2 Q: Okay. Do you know if they can do CPR, Defender

3 employees?

4 A: They did not have ---

5 Q: They cannot ---

6 A: They were not certified, as well as I remember,

7 in CPR.

8 Q: But you're not sure?

9 A: I'm not positive.

10 Q: All right. How about first aid? Can they

11 provide first aid; do you know?

12 A: Well, I imagine.

13 Q: Okay. So but is it your testimony you're not

14 sure whether there was any training, any

15 interactions between Defender employees and the

16 sheriff's department in terms of active-shooter

17 training, for example?

18 A: I don't believe there was any active shooter

19 training at that time, but I'm not -- I'm just

20 not positive.

21 Q: All right.

22 A: I know that Sheriff Underwood was very angry.

23 And from what I understand, he pulled the

24 deputies once we hired Defender.

25 Q: Right.



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1 A: And I don't know -- well, I just don't know the
2 rest of that story, whether it was him or
3 whether Dr. Slayman decided that we didn't need
4 the sheriff if we had Defender.

5 Q: Okay. The conversation that you had with
6 Dr. Slayman about Idaho, I thought I heard you
7 testify something along the lines of very
8 little diversity. What did you mean by that?

9 A: Well, that was the way Dr. Slayman described
10 it.

11 Q: Okay. She said very little diversity?

12 A: Very little diversity among the people.

13 Q: Okay.

14 A: And so -- and that was the way she talked. I
15 never heard her call an African American black.

16 Q: Right.

17 A: She always referred to African American as
18 African Americans. She called -- well, we have
19 very few Hispanics in the community. We have
20 more toward the Louisville area, I think. But
21 I've never heard her say anything -- you know,
22 never heard her say anything derogatory about
23 any person, any race, any people.

24 Q: Understood.

25 A: Any religion or anything.



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1 Q: Right. Okay. Just a few more. The breakfast
2 club, as they called it, was that a daily
3 thing, do -- or do you know?

4 A: I don't know. I was never invited.

5 Q: I was gonna ask you that. I meant to ask you
6 that to start with. Me neither. But I'm gonna
7 ask a hypothetical -- and they might object to
8 it -- but in -- it -- she is receiving -- and
9 everybody seems to -- I believe your testimony
10 indicated that there -- you know, she sought
11 counsel in the most general terms from this
12 group that she had breakfast with; is that your
13 understanding?

14 A: No.

15 Q: Okay. Did she meet with a group of men, I
16 guess, mostly men -- I don't know if women were
17 in this breakfast club or not -- and discuss
18 events of the day in your community in Chester?

19 A: I have no way of knowing, but that would be my
20 assumption.

21 Q: All right. Assuming they do, is it -- would
22 there ever be a problem, in your mind and as a
23 board member, former board member, if
24 Dr. Slayman, as superintendent, ever defer to
25 the breakfast club over her senior staff?



1 A: I don't understand what you're trying to ask.

2 Q: Well, would it be improper in your mind if she
3 took the advice of the breakfast club over and
4 against the advice of her senior staff, their
5 employees in the district?

6 A: Concerning what kind of matter?

7 Q: Any matter.

8 A: Now, if she was going to the breakfast club and
9 saying should I spend \$20,000 on computers ---

10 Q: Fair enough.

11 A: --- you know, I -- that would probably not be
12 something she should ask ---

13 Q: Well, as a board member, would it concern you
14 if at times she was more differential to the
15 breakfast club than she was to her own senior
16 staff?

17 A: I just -- there's no way to answer that
18 question.

19 Q: Okay.

20 A: I mean, to say board differential to one than
21 the other is -- they don't -- those things
22 don't mesh. You can have conversations with
23 friends about a number of things and they can
24 give you some advice and you can take it or
25 leave, and then you can go to work and you say,



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1 well, you know, my friend was telling me --
2 giving me some advice about this, and I think
3 that's a good idea, and use that same advice at
4 work, that's not being differential to one
5 group over another, in my book.

6 I mean, to me, the breakfast club, from what I
7 understand, was -- it was just -- she went --
8 she ate breakfast every morning and she's down
9 in the community and those guys were there and
10 they just started a friendly conversation and
11 it just got to be a regular thing. Because
12 it's like my dad goes to a -- used to go to a
13 coffee club at Gene's Restaurant. They'd leave
14 Sunday school and be late for church, go down
15 and drink coffee and, you know, talk about the
16 world events and solve all the problems, then
17 go to church late.

18 Q: Yes.

19 A: You know, it's just ---

20 Q: You know, it's worse places for them to be.

21 A: And I think I know what you're driving at.

22 Q: Yeah, yeah. And it's probably -- it's just --
23 I think in the context -- I was trying to ask
24 in the context of you as a board member would
25 it have concerned you ---



1 A: If ---

2 Q: --- if she wasn't listening to the guidance and
3 the advise of the professionals that are being
4 paid in their executive positions within the
5 Chester County School District.

6 A: At that point ---

7 Q: And instead of listening to those folks, she
8 goes and says, well, I got to see what the
9 breakfast club wants me to do here. And I'm
10 not suggesting that testimony's existed. I'm
11 just saying as a board member, does it cause
12 you any concern whatsoever in the hypothetical
13 that I've posed to you?

14 A: It's hard to answer a hypothetical.

15 Q: That's fair. I won't push it.

16 Okay. Authorizing the head of security
17 Andre -- I forget his name.

18 A: Williams.

19 Q: Yes, ma'am. \$60,000, the board authorized
20 that?

21 A: Yes. It was first advertised. It was put out
22 it was gonna be -- Defender was gonna do that
23 particular job. Dr. Slayman came to the board
24 and said that she would like to have the person
25 over that as an employee of the district.



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1 Q: I understand.

2 A: And I wanted to offer something that would be
3 comparable to a teacher's salary.

4 Q: Why wasn't it advertised at \$60,000 then?

5 A: I can't answer that question.

6 Q: Do you know if any of Jeff Gardner or Charles
7 King were aware that the salary was to be
8 increased to \$60,000?

9 A: I don't know the answer to that.

10 Q: When you're advertising for positions in the
11 district, is it typical to advertise one amount
12 and then almost double it a few days later
13 after the person is -- has -- as the person is
14 preparing to sign the documents? Is that
15 common?

16 A: No, that's not common. But from my
17 understanding of it, there was -- I believe
18 that there was an error in calculating too, as
19 well I remember. This has been, you know,
20 several years ago now, and I'm old.

21 Q: Oh, you're not old.

22 A: But the board was aware of it. Now, whether
23 Mr. Gardner or Dr. King was aware, I don't know
24 the answer to that.

25 Q: Sure.



1 A: I would certainly believe that Dr. Slayman
2 would have discussed it with them.

3 Q: And when you mean -- what do you mean by that,
4 discussed it with them while they're doing the
5 interviews?

6 A: You know, I don't remember if we decided to
7 change it before the interviews took place or
8 after the interviews take -- took place. I
9 really don't remember, you know, which came
10 first. But I do know that when it was first
11 advertised, it was done so by Defender. It was
12 for a Defender person. And I don't know if
13 that was ever changed. I just don't remember,
14 you know, all of that.

15 Q: Switching gears real quick, were you aware of
16 any other personnel issues that were brought
17 before the -- strike that. You can't talk
18 about personnel issues in an executive session.

19 A: Right.

20 Q: If you would just give me one second?
21 Oh, yeah. Did you guys change the salary by
22 vote of some sort of this gentleman? Wouldn't
23 that be in the minutes somewhere?

24 A: I really don't remember. I don't remember
25 taking a vote on it. The vote would have been



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1 taken out in public, and I don't remember
2 voting on it.

3 Q: Oh, so it could have been something she just --
4 one of those phone calls that you got from her?

5 MS. POLVI: Object to the form.

6 Q: Could have been? I'm asking. Could it be just
7 a conversation with Dr. Slayman?

8 A: No. This was in a board meeting. In fact, it
9 was in executive session.

10 Q: Okay. So I didn't mean to ask of executive
11 session information.

12 Then after you come out of executive session,
13 you have to vote on stuff. So you don't
14 remember it being a vote?

15 A: I don't remember it being a vote. I remember
16 we discussed it was a personnel issue but ...

17 Q: That's fine.

18 A: I do remember that we -- that -- I think what
19 the vote was is that we would hire -- that
20 particular position would be a school district
21 position, I think is what we voted on.

22 Q: I think that's all I have. Thank you.

23 HEARING OFFICER: Follow-up?

24 MS. POLVI: Brief.

25 HEARING OFFICER: Sure.



MS. STROMAN - REDIRECT-EXAMINATION BY MS. POLVI:

Q: Have -- Mr. Winburn asked you about whether subordinates would be forbidden to speak with the school board. Did the senior staff, indeed, speak with you during the time frame that you sat on the Chester County School Board?

A: Yes.

Q: And did that include Anna Stroud?

A: Yes.

Q: Did that include Brooke Clinton?

A: Yes.

Q: Did that include Shawn Williams?

A: I don't remember -- yes. I think Shawn talked -- oh, I -- you know, it would be more like in passing and just friendly talk.

Q: Did that include Jeff Gardner?

A: Absolutely.

Q: Did that include Charles King?

A: Yes.

Q: And just want to clarify some time frame if -- there was some questions about the timing of the training of Defender. Isn't it accurate that actually Defender put in place is right around the same time that this complaint gets

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1 lodged against Dr. Slayman?

2 A: Yes.

3 Q: And that Dr. Slayman wasn't even a
4 superintendent when Defender started?

5 A: That's correct.

6 Q: Would you as a board member -- and let me
7 preface this -- is that Mr. Winburn, in the
8 initial part of his cross-examination, asked
9 you about whether you knew that the board of --
10 excuse me -- the Department of Education, State
11 board can investigate concerns as they see fit.
12 Do you recall that?

13 A: Yes.

14 Q: But would you, as a board member, expect that
15 the superintendent inform you when they would
16 be reporting the former superintendent?

17 A: I would expect that as a board member.

18 Q: And no such notice was ever given to the board?

19 A: No.

20 Q: Okay. Thank you.

21 **HEARING OFFICER:** Any follow-up?

22 **MR. WINBURN:** Yes. One.

23 **MS. STROMAN - RECROSS-EXAMINATION BY MR. WINBURN:**

24 Q: Respectfully, what is the difference between a
25 teacher threatening another teacher, I will rip



1 your throat out, and the right of the board to
2 sign off on the report to the Department versus
3 a superintendent allegedly making such threat
4 and you guys having to sign off as a board?
5 What distinction is there between a certificate
6 holder who is a superintendent versus a
7 certificate holder who is on the front lines
8 and is a teacher? Is there one?

9 A: I would think, now, if a schoolteacher -- say
10 for example, if I as a school teacher, went
11 across the hall and I was mad at a teacher
12 across the hall from me and I told her -- well,
13 let's say that -- well, say I threatened her
14 and she goes to the principal. Okay. Does the
15 principal go straight to the State Department
16 of Education to report that?

17 Q: No.

18 A: Or does the principal go to the superintendent
19 and report that?

20 Q: She resigns. What -- you answered a question.
21 You -- I understand your testimony was this,
22 that because -- by virtue of the fact that
23 she's a superintendent, y'all thought that
24 y'all needed to sign off on a report to us?

25 A: No. That's not what I said at all.



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1 Q: Okay.

2 A: That would be -- in my view, that was the chain
3 of command. That's respect for the board
4 members. If I, as an interim superintendent,
5 was going to do something that I knew that the
6 majority of the board did not agree with, then
7 I would certainly go to the board as a
8 courtesy, if nothing else, not that he would
9 have to do it.

10 Q: To get their -- so you're not testifying that
11 they ---

12 A: That he ---

13 Q: --- that sign-off is required?

14 A: No, I'm not testifying to that.

15 Q: All right.

16 A: That not in our board policy. I mean, I've
17 never seen anything like this. We don't
18 have -- I don't know if ---

19 Q: I just wanted to make sure I understood you.

20 A: --- made the board policies any better than it
21 used to be. But that was not board policy, no.
22 But I assume that that would be courtesy and
23 chain of command.

24 Q: Understood. So they -- he didn't even run it
25 by you?



1 A: No. Had no idea.

2 Q: He didn't tell you he was doing it?

3 A: He didn't tell us anything about that.

4 Q: Okay.

5 A: When he resigned, he -- the thing that I
6 remember that he said that night was that he
7 thought that he could come and help heal
8 Chester, and apparently there were board
9 members -- I was one he was talking about --
10 that was not going to let him do that. And so
11 he thought that he could not -- he could no
12 longer do what he had hoped he could do for
13 Chester.

14 Q: Why do you think he was talking about you when
15 he said that?

16 A: Because I was steadfast in my belief that
17 Dr. Slayman was innocent. And three other
18 board members were as well. And I think.
19 Dr. Callicutt was -- well, I can't -- I
20 shouldn't say that because I don't know what
21 was in his head. I hope that he had the best
22 interest of the school district at heart. But
23 would you have done that, had you been an
24 interim superintendent and knowing what had
25 been in the papers and knowing that her career



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1 had been upended like it was?

2 Q: Respectfully, if the ---

3 A: Without knowing ---

4 Q: --- law required me to it ---

5 A: Without going to the board and discussing it
6 with the board?

7 Q: Wouldn't make any deference.

8 A: Well, I wouldn't.

9 Q: I understand. Yeah. And I think -- I think
10 it -- yeah. Sure.

11 A: You know, my granddaddy always said two heads
12 are better than one, even if one's a goat head.
13 So, you know, you don't always have all the
14 information. Some -- you got other people's
15 perspectives.

16 Q: That's right. And I ---

17 A: That's helps you decide.

18 Q: I totally agree with you there. I don't have
19 any other questions.

20 **HEARING OFFICER:** Any ---

21 **MS. POLVI:** I do not.

22 **MS. STROMAN - EXAMINATION BY THE HEARING OFFICER:**

23 **HEARING OFFICER:** I just have one quick question for
24 you.

25 A: Okay.



1 **HEARING OFFICER:** And if I'm getting into something
2 that was in executive session, just stop me,
3 okay.

4 A: Okay.

5 **HEARING OFFICER:** Because I have no way of knowing.

6 A: If I can remember.

7 **HEARING OFFICER:** All right. What I want to ask
8 about is, you were testifying about the fact
9 that those five people that signed the
10 grievance then came to the board and talked to
11 the board; is at that accurate?

12 A: Kind of.

13 **HEARING OFFICER:** Okay.

14 A: It was during a meeting, and there was lots of
15 community people, the ones who'd been whipped
16 up the social media and the Facebook pages
17 and ...

18 And the four of us who were in favor of
19 Dr. Slayman we had also been vilified. We had
20 targets put on our heads on Facebook. And did
21 I think that was a physical threat? No. I
22 knew that they meant they were targeting us to
23 vote us out. Again, I think I have pretty good
24 common sense.

25 But during that meeting, we -- they -- the



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1 grievants kept saying that we were gonna go
2 public. They were gon' go public with
3 everything, and we were trying to keep it out
4 of the public domain, even though that was a
5 moot point then. And we probably should have
6 just let it blown up out in the open. But we
7 were trying to do what we thought was best for
8 the district, what we thought was best for
9 Dr. Slayman, and what we thought was best for
10 the five people.

11 So they came and they sat down. It was in this
12 room. It was the technology room, and so it
13 was like an auditorium kind of thing. And we
14 were sitting way up here, and they were sitting
15 way down there, which was not good optics
16 anyway (indicating). And we were allowed to
17 ask questions to them. And one of board
18 members got kind of heated with Ms. Stroud.
19 And the attorney, Mr. Nichols, I believe it
20 was, stopped her. And so I had questions, and
21 so I questioned Dr. King about his relationship
22 prior with Dr. Slayman, and he talked about
23 that they -- yes, they were good friends but
24 things had changed and blah blah blah. And we
25 were sitting there, and our attorneys, the



1 board's attorneys, didn't ask them anything.
2 Jeff Gardner said a few things, and he said he
3 kept some notes -- and it was mostly about
4 Defender. And everything kind of came -- all
5 came back to Defender services and the sheriff.
6 And the other common denominator with that was
7 Dr. Hughes.

8 Dr. Hughes was the physician for the
9 sheriff's -- for the County. He, you know,
10 was -- for the inmates. And his salary was
11 \$200,000-some odd a year. And it was pretty
12 well known around the school district and
13 the -- with the sheriff that Dr. Slayman and
14 the sheriff didn't like each other very much.
15 And it just seemed odd that Dr. Hughes got on
16 the board, and then after Dr. Slayman was
17 vilified and her career ruined, Dr. Hughes
18 resigned from the board. And it just seemed
19 like an odd coincidence to me. And I'll leave
20 it at that. But as -- and then while we were
21 sitting there, Allison Hanna's phone went off
22 and she said, uh-oh, the Bagley report's in the
23 paper.

24 **MR. WINBURN:** Executive session.

25 **HEARING OFFICER:** Yeah.



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1 A: So I thought, well, there's no need to ask any
2 more questions. I mean, you know, we just well
3 go out and shout it to the world because it
4 just was shouted to the world. Who dropped it?
5 I don't know. I have my suspicions, but I
6 can't testify under oath to that. I don't
7 know. But that was all the interaction. As
8 far as our board policy, the grievance was if
9 you have a grievance, it was supposed to go to
10 the superintendent. Now, had Dr. Slayman told
11 me that she was gon' cut my legs off or rip my
12 throat out, I would have gone and I would have
13 sat down with her and I'd say, Dr. Slayman, did
14 you really mean bodily harm to me? You know,
15 I ---

16 **HEARING OFFICER:** But she works for you, correct?

17 A: No. I'm saying if I was one of her employees.

18 **HEARING OFFICER:** Oh.

19 A: The grievance policy says you go to the
20 superintendent. The senior staff takes the
21 grievance to the superintendent. And we were
22 told, well, see they couldn't do that because
23 she was the person they were grieving against.
24 I said, well, they're supposed to come to the
25 board. That was what the policy said.



1 Instead, they wrote just a little snippet of a
2 letter, which they all signed, and they said
3 they were bringing a group grievance.

4 Again, it was that train on the track that we
5 could not stop. And it just -- it had a life
6 of its own because it was fueled by someone who
7 had knowledge of what was going on in the
8 boardroom, who leaked it to press and who put
9 it on Facebook. And that's the only
10 interaction that I -- that we had with the
11 grievants.

12 **HEARING OFFICER:** In your interactions with the
13 staff, with the senior cabinet members ---

14 A: Uh-huh.

15 **HEARING OFFICER:** Was it frequent that y'all
16 would -- you and others, as board members,
17 would pick up the phone and call those senior
18 cabinet members?

19 A: No. It was not -- that was not part of what
20 the board would do.

21 **HEARING OFFICER:** Is it fair to say that the
22 majority of your communications would have been
23 directly with Dr. Slayman?

24 A: Yes.

25 **HEARING OFFICER:** Okay. Do you ever recall where



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1 any of the senior cabinet members called a
2 member of the board?

3 A: The only time that I know that a senior cabinet
4 member called one board member was to report
5 the incident of -- that Dr. Slayman had been
6 mean and cruel and what have you.

7 **HEARING OFFICER:** Okay.

8 A: But it was never brought -- that person never
9 came to the full board and discussed exactly
10 what happened. The only thing that we knew was
11 once the Bagley report was done.

12 **HEARING OFFICER:** And that person never put it in
13 writing; is that correct?

14 A: Not that I know of.

15 **HEARING OFFICER:** Okay. I think that's all
16 questions that I have.
17 Do either of y'all have any questions in
18 follow-up?

19 **MS. POLVI:** No. Thank you.

20 **MR. WINBURN:** No, ma'am.

21 **HEARING OFFICER:** All right.

22 **THE WITNESS:** Thank you.

23 **HEARING OFFICER:** Thank you very much.

24 **(Witness excused.)**

25 **(Off the record.)**



1 **HEARING OFFICER:** Let's let the court reporter swear
2 you in.

3 **JAMES E. STROMAN,** having been duly sworn, testifies
4 as follows:

5 **HEARING OFFICER:** All right, Ms. Polvi.

6 **MS. POLVI:** Thank you.

7 **MR. STROMAN - DIRECT EXAMINATION BY MS. POLVI:**

8 **Q:** My name is Shannon Polvi. I am an attorney with
9 Cromer, Babb, Porter & Hicks, and I represent
10 Dr. Slayman. This is a disciplinary matter
11 related to her educator license and I believe
12 you have some information that would be
13 relevant for Ms. Pike to hear.

14 **A:** Okay.

15 **Q:** First, let me ask you just some background
16 information about yourself.

17 **A:** Okay.

18 **Q:** How are you connected to the education field?

19 **A:** Well, I'm married to a teacher for 44 years and
20 also served on the Chester County School Board.
21 And I had four children -- excuse me -- three
22 children that graduated from public schools in
23 Chester. And I was on the State school board
24 for four years.

25 **Q:** And that was, what, four years?



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1 A: Yes, ma'am.

2 Q: And during the time frame that you were on the
3 Chester County School Board, were you on the
4 board when Dr. Slayman was hired?

5 A: Yes, I was. And if memory serves me, it was
6 like two thousand -- January of 2005 -- wait a
7 minute. I was on it for two years before I
8 went on the State. So it was in January, I
9 remember, but 2005, 2006.

10 Q: 2012 maybe?

11 A: I'm sorry. I'm sorry.

12 Q: I think a little further back.

13 A: I was sitting up there zoned out. Yeah.

14 Q: Okay.

15 A: That's correct to give then, because two years
16 after that, I was on the State board. So it
17 was on January in 2014 when I went to the State
18 board? I'm thinking. Pardon me.

19 Q: And you were on the State board until earlier
20 this year 2018?

21 A: January '18, 2018.

22 Q: And that was for the normal term?

23 A: Usually we go off on the 31st, but if some --
24 a member is not, in the district I represent
25 has not been named, then you would still attend



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1 until the new person gets sworn in. And so I
2 was there in January, and the new person came
3 in in February.

4 Q: Describe during the time frame that you
5 interacted with Dr. Slayman on the Chester
6 County School Board. How was interactions?
7 Describe those?

8 A: As a board member, well, I was very pleased
9 with her. She seemed -- she was very
10 congenial. She was well liked in the
11 community. She knew her job, and she did her
12 job. One thing impressed me about her, she was
13 a special ed teacher. And -- when she started
14 teaching, she was a special ed teacher. My
15 wife was a special ed teacher, and it takes a
16 special person to be a special ed teacher.

17 Q: And I want to ask you a little bit more about
18 the hiring process. Was a gentleman named Jeff
19 Gardner at one; point considered his hat in the
20 ring for the superintendent position?

21 A: Yes, he was.

22 Q: And tell us about that, please.

23 A: Well, there were -- to other individuals and
24 Jeff Gardner applied for it. It was kind of
25 like a -- he had qualifications, but it was



1 all -- it was a courtesy interview that you
2 give someone for the district who wanted to
3 apply for the job, it's gonna be very
4 embarrassing if you didn't even hear him, so he
5 was -- we actually interviewed him. So he was
6 one of the top three.

7 Q: And were you -- well, actually let me rephrase.
8 When Mr. Gardner was not hired for the
9 position, what was his response?

10 A: I don't think he was very happy about it. What
11 happened was the other two individuals
12 dropped -- received jobs elsewhere, so he was
13 the only person left standing. And the board
14 considered -- just because the board, at the
15 time if I can remember, decided to go and open
16 it back up so we would have three people to
17 choose from because we were trying to hire the
18 best person we could for our school district
19 and not just the only one left.

20 Q: And Dr. Slayman supplied her application when
21 it was reopened?

22 A: Yes. Along with some other folks.

23 Q: With regard to the -- there's a couple of
24 individuals I want to ask you about. Did you
25 interact with Anna Stroud in the capacity of



1 the finance director role?

2 A: Yeah. She was in financial office and actually
3 took over the finance director while I was
4 serving on the board, because I served
5 approximately nine years.

6 Q: Were you on the board when there was a time
7 frame discussion about Ms. Stroud's salary
8 being frozen?

9 A: Yes.

10 Q: Will you please tell us about that?

11 A: Well, the salary -- Ms. Stroud did not -- she
12 was hired and she said she was finishing up her
13 college degree, and one stipulation was that
14 she would have to finish her college degree.
15 And she didn't. And so the salary was frozen
16 because she had not completed what she said she
17 gon' do when she was hired.

18 Q: And was there any type of time limit on that
19 salary freeze?

20 A: Yes, it was. The time limit was it was to be
21 when she completed her coursework in college,
22 which she said she was gonna do.

23 Q: During the time frame that you were on the
24 school board, had she done so?

25 A: No.



1 Q: Was that a concern that you had on the
2 board ---

3 A: Yes.

4 Q: --- about?

5 A: Not myself but other people on the board also.

6 Q: With regard to Brooke Clinton, was she in any
7 type of employment capacity with the school
8 district when you were on the school board?

9 A: Yeah. I think when she first started, she was
10 like part-time public relations person. Again,
11 that's -- I just remember her being part-time.
12 But I think later on she was brought on
13 full-time by Dr. Slayman.

14 Q: And with regard to -- I'm gon' backtrack to ---

15 A: Sure.

16 Q: --- Anna Stroud before I ask more about with
17 regard to Brooke Clinton.

18 A: Yes, ma'am.

19 Q: During the time frame that you were at Chester
20 County School District and Ms. Stroud was and
21 Dr. Slayman was, did you ever observe
22 Dr. Slayman treat Ms. Stroud in any type of
23 hostile way?

24 A: No, ma'am.

25 Q: During the time frame that Brooke Clinton,



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1 yourself, and Dr. Slayman were at the Chester
2 County School District, did you ever see
3 Dr. Slayman treat Brooke Clinton with
4 hostility?

5 A: No, ma'am.

6 Q: I'm going to ask you some additional follow-up
7 about Jeff Gardner. With regard to Jeff
8 Gardner, were you on the board when he was
9 promoted from principal to associate
10 superintendent?

11 A: Yes, ma'am.

12 Q: And tell us about that process.

13 A: There was a vacancy available and, you know,
14 I -- from what I recall, he was interviewed.
15 And he had career -- school experience in
16 construction. And I think he had been a
17 contractor at one time. So that was taken into
18 consideration. Plus he was with the district
19 and knew the district. I knew Mr. Gardner. He
20 was an assistant principal with the high
21 school, an he was the principal. And I've
22 known him for, you know, years. My wife taught
23 at the high school, and I had known him, and I
24 liked him.

25 Q: And did Dr. Slayman support Mr. Gardner when he



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1 was applying for the job?

2 A: She brought a recommendation for us to hire
3 him. She could hire him with recommendation if
4 the board approved.

5 Q: With regard to Jeff -- during the time frame
6 that Jeff Gardner, yourself, and Dr. Slayman
7 were at Chester County School District, did you
8 ever see Dr. Slayman treat Jeff Gardner with
9 hostility?

10 A: I didn't see her treat anybody with hostility.

11 Q: During the time frame that you were at the
12 school district, did you also overlap with
13 Charles King?

14 A: Yes. It was -- and, again, my memory's foggy
15 on this, but I -- she was -- she brought -- I
16 remember her talking to us about him and said
17 that she was wanting to hire him because she
18 had worked with him for years past. And he, I
19 think, was teaching at some online university
20 and running a gymnasium I just thought.
21 Weightlifting place or something. I recall
22 that. But she -- we respected her decision.

23 Q: And based on that testimony, fair to say that
24 Dr. Slayman was supporting the advancement of
25 Mr. King's career?



1 A: Sure. Yes, ma'am. She thought he went best on
2 the staff.

3 Q: During the time frame that Charles King,
4 yourself, and Dr. Slayman were at the school
5 district, did you ever see Dr. Slayman treat
6 Dr. King with any hostility?

7 A: Not that I recall; no. And I never even heard
8 anything about anybody being mistreated,
9 because I've been in Chester for a long time,
10 and my wife had been through -- she's taught in
11 the elementary school, the junior high school,
12 and the high school. And my kids were
13 straight -- they were -- went at different
14 ages, so I had a lot of contacts with teachers
15 in the area. Plus I go to the largest church
16 in Chester County and a number of people that
17 are there either work in the district office or
18 in the -- as teachers. And people would come
19 and tell me things bout what they didn't like
20 about their classroom. Either the air
21 conditioner wasn't exactly the right
22 temperature or something like that. But I
23 never heard anything from any of the people and
24 staff. And I felt like they would have come to
25 me and tell me.



1 Q: And did you work with Shawn Williams with HR?

2 A: Yes, ma'am.

3 Q: And with regard to Ms. Williams, did you ever
4 observe Dr. Slayman -- during the time frame
5 that you, Ms. Williams, and Dr. Slayman were
6 all at the district, did you ever observe
7 Dr. Slayman treat Ms. Williams with any
8 hostility?

9 A: No, ma'am.

10 Q: With regard to the -- actually, let me
11 backtrack for a little more.

12 Is it -- this is a disciplinary matter
13 regarding what's largely been publicized about
14 allegations of a hostile work environment. Are
15 you aware of any motives of the individuals who
16 were the grievants about why they might file
17 such a complaint against Dr. Slayman?

18 A: No, ma'am.

19 Q: And with regard to ---

20 **MR. WINBURN:** I'm sorry. Was that a ---

21 **THE WITNESS:** I said, no, ma'am.

22 **MR. WINBURN:** Okay.

23 Q: And with regard to the kind of time frame at
24 the time it was filed, September 2015, you were
25 not on the Chester County School Board?



1 A: No, ma'am, I was not.

2 Q: I want to ask you a little bit of follow-up
3 about school board addressing grievances.
4 Is -- what is your understanding of what the
5 best practice would be for a grievance process?

6 A: We have -- in our policy and procedure manual,
7 we have a policy to that addresses grievances.
8 I just know that because I was -- had a rainy
9 day and I looked over the policy at one time.
10 It was a looking thing so ... But most things
11 did -- it comes from -- it was probably from
12 the school board association, but a lot of our
13 policies mirror theirs, and they kind of
14 provided them to us. And we just have to -- we
15 fine-tune them sometimes. Different other
16 policies, we'd fine-tune them so we would
17 actually -- to meet our particular situation in
18 the district. Tends to worry or whatever. But
19 I don't remember this one being the ones.

20 Q: With your involvement in Chester community for
21 an extended period of time, can you describe
22 kind of how the politics of the community were
23 in 2015?

24 A: Well, it was a situation involving security
25 personnel. And we -- and this is something I



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1 faced when I was on the board too. We didn't
2 have enough SROs, sworn police officers from
3 the county to supply in the schools. And we
4 were concerned about getting more. And, you
5 know, everything, you know, in a small county,
6 everything's politics. Of course, the -- at
7 that time the sheriff wanted to have more of
8 his people so he could add to the staff. But
9 the County wouldn't give him any money, so
10 money was that there.

11 And so we were -- we -- they were faced at the
12 time with either having contracted the security
13 services at the school or having no one at the
14 school. And that concern -- that can really
15 concern me that a school was not protected,
16 because if something happened like happened up
17 at Sandy Hook or whatever like that, that would
18 be terrible. How could you -- how could a
19 board -- I wasn't on the board at the time --
20 but how could you actually look a parent in the
21 face and tell them that their child is dead
22 because there's not a security guard there? So
23 somebody would -- that's a hard thing to
24 explain to someone.

25 Q: With the -- with regard to security, did the



1 conversation about school security start in
2 2015, or was that and ongoing board focus?

3 A: It was being -- we talked about it prior that,
4 and I can't give you the date. And I'm not --
5 I can't say if Dr. Slayman was there or not,
6 but it was of the concern that we were gon'
7 look into it. That was the thing we were gon'
8 do because it was -- wasn't right, to share a
9 security officer between school and the
10 distance between the schools. And the
11 elementary schools were basically not being
12 covered.

13 Q: Beg your indulgence for a moment.

14 A: Sure.

15 (Off the record.)

16 Q: To follow up on that least thread, during the
17 years that you were on the Chester County
18 School Board, had you sought to get this --
19 essentially, the County to give additional
20 funding for more SROs?

21 A: It was -- yeah. That was a ongoing situation,
22 trying to get more funding for SROs. And the
23 county supervisor would act up.

24 Q: And the County supervisor had declined to give
25 additional funding before Sheriff Underwood was



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1 ever even elected, right?

2 A: That was back in the past, 'cause that was
3 something that came up in the past.

4 Q: And there had been some question about
5 community reaction to Sheriff Underwood after
6 his election because of his race. Were the --
7 not with regard to Ms. Slayman but some other
8 testimony. Is that -- I just want to put in
9 context the denial of funding didn't start when
10 Sheriff Underwood became sheriff? That was --
11 also occurred with the white sheriff as well?

12 A: Yes.

13 Q: How would you describe, based on your personal
14 observations, Dr. Slayman's interaction with
15 community leaders around Chester County?

16 A: Everybody I talked to liked her. She was
17 outgoing, friendly, always smiling.

18 Q: And would it benefit the school district to
19 have a superintendent who was attending
20 different social events, interacting with the
21 community and different venues?

22 A: When you get to know people and they get to
23 know you, you can hear other ideas from various
24 groups of business groups or any or any other
25 group that would tell you about what's going on



1 and what the instruction they wanted the school
2 system to be going in.

3 Q: And Chester County is a small enough county
4 where there's just one school district, right?

5 A: That's correct. It's about the -- by size-wise
6 it's the 22nd in the state.

7 Q: And from that perspective, would it be fair to
8 say that a superintendent should know the
9 heartbeat of what's going on in the county?

10 A: Yes. At that particular time when I was on,
11 there economic one time, Chester County was
12 like number one or two -- number two in
13 unemployment in the state. So the funds were
14 not flowing into the county. And that's one
15 reason I always say that the, you know, the
16 money just wasn't there. They didn't have the
17 money to do it with. I'm talking about the
18 county supervisor.

19 Q: And from the county perspective, the school
20 district perspective, is budget always a
21 concern in terms of trying to bring in new
22 revenue?

23 A: Oh, yes. Yes, ma'am.

24 Q: And I think I've covered most of what I wanted
25 to ask you about, but is there anything that



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1 you think is important for Ms. Pike to know
2 that I have not asked you about?

3 A: I guess the only thing I would like to say is
4 I was shocked when I heard the complaints.
5 And -- because, you know, if anything -- and
6 that's on the side -- and I've sat on the
7 school board. People love to talk to you about
8 various things. I can tell you about the
9 number of times that somebody lived a mile or
10 so from where the district lines was from one
11 school to the other and they wanted -- I always
12 say that -- talk with Dr. Slayman about it.
13 And then later on you would say -- you would
14 see them and you asks him, well, happened did
15 it go. And I said, you know, she would be the
16 person to talk. So she was -- she said she
17 didn't do what I wanted her to do, but she was
18 listening -- listened to me and she was very
19 kind and, you know, just pleasurable. It
20 was -- so she met people real well. So I heard
21 even though didn't get -- they didn't get what
22 they wanted, they were very satisfied with how
23 they were being treated.
24 So I would, you know, you would think with kids
25 in school and my wife teaching, that you would



1 think that if it's anything going on that you
2 would hear something. People love to talk.

3 **MS. POLVI:** Those are all my questions. I have may
4 have follow-up, but Mr. Winburn has a
5 opportunity to ask you questions.

6 **MR. STROMAN - CROSS-EXAMINATION BY MR. WINBURN:**

7 Q: Good evening, Mr. Stroman. I appreciate you
8 being here.

9 A: Yes, sir.

10 Q: Yeah. Scott Winburn for the Department.
11 Mentioned you knew Jeff Gardner?

12 A: Right.

13 Q: Known him your whole life -- or his whole life?

14 A: No. I -- I'm old, but I'm not that old. I
15 moved to Chester County in '71 or '72 after I
16 got out of service. And I probably met him
17 when he was assistant principal at the high
18 school because my wife used to work there.
19 Plus, like I said it's -- got to know him
20 'cause his son was friends with my son.

21 Q: Would you call him a trustworthy person, in
22 your view?

23 A: I have no reason to doubt his trust. I mean,
24 I have no -- I cannot quote you anything ---

25 Q: No. You don't know of an occasion where



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1 he's -- you've known him to mislead anybody; is
2 that fair to say?

3 A: No. I've not -- never heard of that?

4 Q: You also mentioned Shawn Williams. You worked
5 with Shawn Williams ---

6 A: Yes.

7 Q: --- a little bit? Same question: Did you find
8 her to be a good person to work with, as a
9 member of the board and she is, I guess, head
10 of HR?

11 A: Yes, sir. That's what she was in, HR; yes.

12 Q: Did you find her to be a trustworthy account
13 owner any ---

14 A: Trustworthy means -- what's the -- you know ---

15 Q: Whatever your definition is.

16 A: I was -- you hadn't -- didn't hear anything
17 negative about her.

18 Q: Credible?

19 A: I didn't hear anything negative about her.

20 Q: Okay. Now, you mentioned Sandy Hook?

21 A: Uh-huh.

22 Q: And I wanted to know if you knew about any
23 specific training that was undertaken between
24 the sheriff's department and the folks with
25 Defender? Was there any exchange of



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1 information there?

2 A: That was not -- I cannot recall. That doesn't
3 mean that it didn't.

4 Q: Right.

5 A: Because that was something that was not my in
6 my wheelhouse. I mean, that's something that
7 I wouldn't be following because, as a board
8 member, you set policy and objectives ---

9 Q: Sure.

10 A: --- and you have your people to ---

11 Q: But in -- let me ask you this, if you can
12 answer this question: You spoke some about the
13 socioeconomics of Chester?

14 A: Sure.

15 Q: Not having a whole lot of money coming into the
16 county?

17 A: That's correct.

18 Q: Would you agree that your public services,
19 including the sheriff's department, the police
20 department, EMS, there needs to be coordination
21 among those services, especially in a county
22 that doesn't have a whole lot of money floating
23 around.

24 A: Yes.

25 Q: Agree with that statement?



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1 A: I would think that everybody should get along,
2 even though -- fire departments.

3 Q: Right.

4 A: Everyone should strive to get along with people
5 of the community.

6 Q: Okay. Questions about Anna Stroud: Did you
7 know her to be a solid bookkeeper for the
8 county?

9 A: I had questions about her bookkeeping.

10 Q: Okay. What kind?

11 A: She was -- lots of times, she was not
12 forthcoming with information. She -- when I --
13 we inform we have questions, I have to get back
14 to you. She didn't anticipate questions. I
15 got a masters in business administration, so
16 I -- you know, I would have questions. And
17 then the next time I ask them and she wouldn't
18 have the information.

19 Q: Did he wear -- did she -- I'm sort of -- in
20 general, wearer of multiple hats as executive
21 director of finance? Did she do one job, or
22 did she have sort of a couple of jobs in that
23 position? Does that make sense?

24 A: I couldn't answer your question. I knew she
25 was director and she had people working under



1 her, so she -- it wasn't like she was by
2 herself.

3 Q: Right.

4 A: She had at least two or three people on the
5 office with her who were -- worked on budgets
6 and things like that.

7 Q: Were you aware of any restructuring that had
8 occurred around '07, '08 within the district
9 with regard to finance where positions were
10 eliminate due -- eliminated and never really
11 replaced due to the downturn of the committee?

12 A: No, I do -- I can't recall that.

13 Q: Okay. That's all I have.

14 **HEARING OFFICER:** Any redirect?

15 **MR. WINBURN:** I'm good.

16 **MR. STROMAN - EXAMINATION BY THE HEARING OFFICER:**

17 **HEARING OFFICER:** I've got just a couple questions.
18 Let's talk about Anna Stroud just for a second.
19 Obviously, the school district has to be
20 audited every year?

21 A: Yes, ma'am.

22 **HEARING OFFICER:** Did any of those audits come back
23 bad?

24 A: Not that I recall while I was serving.

25 **HEARING OFFICER:** Okay. So were there really



1 questions about her bookkeeping, or she just
2 couldn't respond to a question that y'all might
3 have asked?

4 A: It was questions that as -- that you would
5 expect someone in her position to anticipate
6 and could answer the questions.

7 **HEARING OFFICER:** I see.

8 A: And it would be like she -- if -- and the next
9 time she would have that answer to that
10 question the next meeting, but then it would be
11 like another one like, well, I don't have that
12 or I'll have to get back to you or I'll have
13 to -- and, you know, you would expect someone
14 in that position to be able to answer financial
15 questions. And that concerned us.

16 **HEARING OFFICER:** Okay.

17 A: Concerned me and other people on the board. I
18 can't speak for the whole board, but I was
19 concerned about that because you got to know
20 where the money is. You got to keep it up.
21 You gotta know where everything's -- what's
22 happening.

23 **HEARING OFFICER:** Was it number-specific-type
24 questions, or was it more ---

25 A: Example would be: Hey, how much money do we



1 have in the funds?

2 **HEARING OFFICER:** I'm sorry?

3 A: How much money do we have right now for a
4 certain -- you know, a certain fund? And, you
5 know -- well I'd have go back and get that.
6 You can put that on a spreadsheet and be able
7 to come up with.

8 **HEARING OFFICER:** So she wouldn't bring those
9 spreadsheets with her.

10 A: Or -- and we were meeting in the district
11 office, which had her office there. And if it
12 was there, she could have gone back and gotten
13 it.

14 **HEARING OFFICER:** I see.

15 A: I just didn't think that she was preparing the
16 board for information.

17 **HEARING OFFICER:** I see. Okay. So the management
18 letters that the auditing firm provide,
19 typically provide every year, those managements
20 letters were not of concern?

21 A: I think we've got good audits every time.
22 That's what you want to know. They, you
23 know -- auditors, they look at a small piece at
24 one time, so they can't tell you everything.
25 They say -- ask for what we looked at, it's



1 what was there. And that's, again, I don't
2 remember any being outside of realm of that.

3 **HEARING OFFICER:** Okay. I want to go back to the
4 issue of the SROs for just a minute.

5 A: Okay.

6 **HEARING OFFICER:** I'm a little bit confused. I
7 think I just didn't hear your testimony.

8 A: Okay. I'm sorry. I'll speak louder.

9 **HEARING OFFICER:** No. I think I just didn't hear
10 it. Maybe my ears are too cold at this point.
11 But at any rate, I understand that there was
12 not enough SROs to supply the schools. And as
13 a board, you were all concerned about that?

14 A: Right.

15 **HEARING OFFICER:** So what was happening was -- and
16 please tell me where I'm wrong in this -- your
17 elementary schools did not have any SROs?

18 A: I can't say that -- they shared an SRO with,
19 like, a school close to them, so they did, but
20 it wasn't a full-time SRO.

21 **HEARING OFFICER:** Okay.

22 A: You're talking about something that's gone, you
23 know, good years back. I just remember the
24 general ---

25 **HEARING OFFICER:** Right.



1 A: --- nature of that. But they didn't have one
2 in the building. If they had an unruly parent
3 that came in ---

4 **HEARING OFFICER:** Right.

5 A: --- they would have to call and ask them to
6 come over here. And the problem with SROs is
7 that they also have dual duty. If you got a
8 big accident out on I-77, which was about four
9 of five miles from school. They might have to
10 respond to that.

11 **HEARING OFFICER:** Oh, I see.

12 A: And the schools would be -- nobody there.

13 **HEARING OFFICER:** Right. So at that point in time,
14 do you happen to remember how many SROs you
15 had?

16 A: No, ma'am. I'm sorry.

17 **HEARING OFFICER:** Okay.

18 A: I could probably look back and try to find that
19 for you.

20 **HEARING OFFICER:** No. That's okay. So ---

21 A: Four or five, I think. Something like that
22 rings, but I, again, I don't want to be
23 misquoted on that. But it wasn't that many at
24 all.

25 **HEARING OFFICER:** So when the independent security



1 company came in, were all the SROs pulled out?

2 A: No, ma'am. Not that I'm aware of. That
3 transpired after I had left.

4 **HEARING OFFICER:** Okay.

5 A: But they actually filled in and supplemented,
6 so we had someone ---

7 **HEARING OFFICER:** So ---

8 A: From reading the paper, what it was, every
9 school had a SRO when they came in.

10 **HEARING OFFICER:** So at the time you were on the
11 board ---

12 A: They did not.

13 **HEARING OFFICER:** The thought process was, in terms
14 of talking about an independent security
15 company coming in, that that was merely to
16 supplement the SROs?

17 A: To make sure that every school had a security
18 person there that can respond if there's some
19 type of tragedy, to avert a tragedy. And at
20 the time we looked at, I don't think Defender
21 was even -- they had not -- these companies had
22 not started thinking about doing stuff in
23 schools.

24 **HEARING OFFICER:** I see.

25 A: And we were kind of being proactive, that we



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1 needed to address that.

2 **HEARING OFFICER:** I understand. That's all my
3 questions.

4 Any follow-up from anything I might ask?

5 **MS. POLVI:** No. Thank you.

6 **MR. WINBURN:** No.

7 **HEARING OFFICER:** Okay. Thank you very much
8 Mr. Stroman.

9 (Witness excused.)

10 (Off the record.)

11 **HEARING OFFICER:** We're going to continue this
12 hearing on Friday, October the 12th. And let's
13 go off ---

14 (Off the record.)

15 **HEARING OFFICER:** All right. So tonight's session
16 has ended, and we will reconvene on October the
17 12th at 9:00 a.m. Thank you.

18 (There being nothing further, the administrative
19 hearing concluded at 7:56 p.m. and resumed October
20 12, 2018, at 9:26 a.m.)

21 DAY THREE - FRIDAY, OCTOBER 12, 2018

22 **HEARING OFFICER:** We are back on the record again.
23 This is in the matter of Agnes Stroman -- I'm
24 sorry -- Slayman. And we are continuing with
25 Ms. Polvi's witnesses.



1 MS. POLVI: Thank you.

2 MR. AGEE - DIRECT EXAMINATION BY MS. POLVI:

3 Q: Good morning, Mr. Agee.

4 A: Hey.

5 Q: I'll be asking you some questions as we kind of
6 go through, and I'm gonna start with some
7 background about you before we get into the
8 pertinent information you have with regards to
9 Dr. Slayman. What are your professional
10 credentials?

11 A: I am a registered -- a retired registered
12 licensed dietitian in the state of
13 South Carolina. Retired a number of years ago,
14 I guess, actually from the Department of Mental
15 Health where I was the director of food
16 services for the state of South Carolina. I
17 was a Army dietitian, and I retired from the US
18 Army Reserve as a rank of Lieutenant Colonel.

19 Q: How long have you resided in the Chester County
20 area?

21 A: Well, I was born in 1946 and lived here except
22 for the years when I was doing my graduate work
23 at the Medical College in Virginia at Richmond,
24 and I lived approximately three years on Hilton
25 Head Island back in the '70s.



1 Q: So for the time frame that Dr. Slayman was the
2 superintendent with the Chester County School
3 District, did you reside in Chester County?

4 A: Yes, I did.

5 Q: How familiar are you with the staff, teachers,
6 and parents in the Chester County School
7 District?

8 A: I'm sorry. I really apologize. I didn't bring
9 my hearing aids. That's totally my fault.

10 Q: How familiar are you with the staff, parents,
11 and teachers involved with the Chester County
12 School District?

13 A: Well, obviously, I know them. I'm more
14 familiar with the people down around Richburg
15 and the school down there named Louisville. My
16 children went to Louisville back in the
17 '80s and '90s, and I was involved a good bit
18 with that. Having come back and retired and
19 become the fire chief in Richburg. We have a
20 lot of school interworking relationships with
21 the school system in Richburg.

22 Q: And how long have you been the fire chief in
23 Richburg?

24 A: Since 1999.

25 Q: And how do you know Dr. Slayman?



1 A: Dr. Slayman -- that's interesting.
2 Dr. Slayman, the first time I ever met her, she
3 was standing in a line at the Subway sandwich
4 shop in Richburg, and I didn't know who she
5 was. And we got to talking. It turned out it
6 was her. And that's the first time I ever met
7 her. And that was right after she came to
8 Chester County as the superintendent
9 probably -- I don't know -- 2012, something
10 like that.

11 Q: Do you have any knowledge as to why you were
12 asked to be a witness today?

13 A: I'm sure y'all have all heard of the infamous
14 breakfast club. That information beat you
15 back -- beat me back to Chester the other day
16 when I came down here. Having read the paper,
17 which I do and keep with things and stuff, I
18 obviously know about the lawsuit with
19 Dr. Slayman and the school system. I also know
20 about the lawsuit with Dr. Bain and the school
21 system and the previous superintendents of the
22 school system that have been hired and
23 contingent to be on the payroll. So, yes, I'm
24 familiar with that from the standpoint of
25 reading it in the paper and the scuttlebutt in



1 the community about what also went on.

2 Q: So let's talk about -- you referenced the
3 breakfast club. Did you attend breakfast with
4 Dr. Slayman during times that she was
5 superintendent?

6 A: Well, I probably am the originator of the
7 breakfast club. For many years when I worked
8 down here, I would go by and eat breakfast and
9 sit down and read the newspaper. And then when
10 I went in business for myself, I left the
11 Department of Mental Health and started a
12 business consulting and I was -- when I wasn't
13 flying all over the United States, I would go
14 up and sit down and read the paper. And so it
15 started a little group of guys started coming
16 in and, you know, it kind of got to be a
17 gathering place for some of the guys in the
18 community, farmers. You have at it. And
19 Dr. Slayman occasionally would only come in and
20 sit down and have breakfast.

21 Q: What type of discussions took place when
22 Dr. Slayman was present?

23 A: Oh, I have no earthly idea. We'd talk about
24 how many bales of hay you get off a acre. We'd
25 talk about how many bales of cotton you would



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1 get off a acre. We would talk about it -- the
2 coroner, Chester County coroner comes down and
3 occasionally has breakfast, and we'd talk about
4 who died and what funeral home got them. It
5 could -- there's no agenda. It was just people
6 coming in and sitting down and shooting a
7 breeze and talking.

8 Q: And would you say that it's a normal
9 conversation in terms of people just talking in
10 the community of what takes place at the
11 breakfast?

12 A: Oh, absolutely. I mean, we would have people
13 like -- Ralph Norman comes occasionally.
14 Several lawyers come. Just different people
15 come in with different conversations. We even
16 had Fox News down there one day doing an
17 interview within the group of people in the
18 restaurant because of the people sitting
19 around. But, you know, obviously we talked
20 about anybody and anything that came up.
21 Mostly fire though. I will have to say we
22 talked an awful lot about the fire service.

23 Q: Did Dr. Slayman ever share personnel
24 information that you would consider protected
25 at breakfast?



1 A: Do what now?

2 Q: Did Dr. Slayman ever share any personnel
3 information at breakfast that you would
4 consider to be protected?

5 A: No.

6 Q: Did Dr. Slayman ever solicit from the breakfast
7 club any type of guidance as to how she should
8 make personnel decisions?

9 A: No. She's got a big stick. What are we gon'
10 tell her to do? That's just not -- that's
11 ridiculous.

12 Q: It's been alleged that someone at the breakfast
13 club referred to the sheriff as a black boy.
14 Do you have knowledge of that ever being said
15 in your presence?

16 A: Do what now? I'm sorry.

17 Q: And I don't think that the allegation is that
18 Dr. Slayman said it, but there was some kind of
19 allegation that somebody referred to the
20 sheriff as a black boy. Did you ever hear that
21 being used?

22 A: I've never heard that. Obviously, the sheriff
23 is a black person.

24 Q: And did anybody ever say anything
25 derogatory ---



1 A: Not to my knowledge.

2 Q: --- about his race?

3 A: It's common knowledge who he is.

4 Q: And did anyone ever say anything derogatory
5 about his race at the breakfast?

6 A: Not to my knowledge as to far -- his father and
7 I were very good friends. His father,
8 unfortunately, passed away, but Mr. Underwood
9 and I served on the Chester Health Care
10 Foundation Board for many years together. So
11 I don't think anybody would say anything bad
12 about the sheriff in my presence, knowing the
13 relationship that I had with his father.

14 Q: Regarding the hiring of Defender as the
15 security group for the Chester County School
16 District, did anybody at the breakfast club
17 have any influence that you observed on
18 Dr. Slayman with regard to that?

19 A: I don't know of anything as it relates to that,
20 other than what I read in the newspaper that
21 the Chester School District secured the
22 services of some private security agency. Now,
23 one thing that I do know, and I have been told
24 this and -- the sheriff's chief deputy or
25 deputy of the sheriff's department, a guy named



1 Keto Crank [ph], a deputy named Keto Crank went
2 to the local Rotary Club and got up and said
3 that every student in Chester High School was
4 a hoodlum. And I do know that. I do know that
5 for -- from that. I think as I understand it,
6 from the person that told me that. Dr. Slayman
7 was there and heard that, and numerous other
8 people also heard it. I did not hear it
9 personally, but I was told directly by somebody
10 that was there. So for the knowledge of me,
11 it's hearsay, but she can answer for herself.

12 Q: With regard to the breakfast club, is there
13 anything else that's important for Ms. Pike to
14 know with regard to what it was?

15 A: Well, you know, you could say a lot of stuff
16 about a lot of people. I could say
17 something -- I was just kidding about him going
18 the Wofford. That doesn't mean anything. He
19 went to Wofford. Wofford's a very good school.
20 Very action very good school. I mean, a very,
21 very good school. I've never heard anything
22 derogatory said. Now, do we pick on each
23 other? Absolutely. They pick on me if I wear
24 a white shirt and tie 'cause I hadn't done this
25 in years.



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1 You know, but as far as being derogatory
2 towards somebody and saying something bad about
3 them or trying to say that we influenced her
4 into doing anything, that's just not the case.
5 Do we argue about politics? Absolutely. Do we
6 argue about how to fix it? Absolutely. But
7 most of it is about the fire service, because
8 there's several people around that table that
9 are talking about the fire service. And when
10 you take the fire service, and you get up in
11 the middle of the night and you go do the stuff
12 that you do and you do it for free, it gets
13 really, really aggravating when somebody else
14 throws a rock in that glass house at you.

15 And so Dr. Slayman was very supportive of the
16 fire service. The security things that she
17 did, the things that she put on at the school
18 system and asked us to come and participate for
19 the first time we ever had been asked to
20 participate in security things and things like
21 that, you know, she was a supporter of the fire
22 service in Chester County and we really
23 appreciated it. And so that made her a really
24 part of our group of people that we talked
25 about.



1 Q: With regard to the breakfast club, one or more
2 of the complainants with regard to Dr. Slayman
3 seemed to allege that somehow she took the
4 purported advice from the breakfast club over
5 her senior cabinet. Based on your observations
6 being at this breakfast club, what's your
7 opinion about that?

8 A: Well, I don't know what she did when she left
9 the breakfast club and how she ran her job.
10 Dr. Slayman and I had a professional
11 relationship. I never went to dinner with
12 Dr. Slayman or her husband. I never invited
13 her to my home, and she never invited me to her
14 home. Other than the fact that she supported
15 the fire department and she came down to our
16 barbecues and our hot dog sales and things like
17 that, and as a part of the community and did
18 that. What she did on her dime, on what she
19 was working, I have no knowledge of that, other
20 than what I've read in the paper.
21 And the accusations made against her, from my
22 knowledge of sitting around that table and the
23 things that I know about her, I find
24 extraordinarily difficult to believe. In fact,
25 I do not believe them. I think it's real easy



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1 to say things about people. I mean, I --
2 things I've heard said about me from all this
3 is ridiculous, you know. But I'll stand up and
4 take up for myself. So I don't believe all
5 that foolishness.

6 Q: And with regard to the grievants. Did any of
7 the senior cabinet ever speak with you about
8 any concerns they had about Dr. Slayman's
9 leadership?

10 A: Now, who is that?

11 Q: Well, with regard to Brooke Clinton, Anna
12 Stroud, Charles King, Jeff Gardner, or Shawn
13 Williams.

14 A: I know -- I would know Charles King if he
15 walked in the door. I would know Jeff Gardner
16 if he walked in the door. I would not know
17 Anna Stroud if she walked in the door. I would
18 not know Ms. Williams if she walked in the
19 door. And I would know Brooke Clinton if she
20 walked in the door. I've met her three or four
21 times. And now, it's my understanding, she is
22 the director or whatever you call -- the lady
23 over -- the person over the Chamber of
24 Commerce.

25 When you shake that saltshaker, you will find



1 they all relate back to one person. When you
2 go these people all tend to be -- Ms. Stroud's
3 husband works for the sheriff; Ms. Clinton's
4 family, as I understand it, it's my
5 understanding, has donated a fair sum of money
6 to his reelection campaign. It's my
7 understanding that Mr. King is not from Chester
8 County, so I don't know what his deal is. And
9 I don't think Mr. Gardner lives in Chester
10 County. So I don't have any knowledge or any
11 conversations with those people. I have spoken
12 with Ms. Clinton a couple of times.

13 Q: What was your reaction when you read about the
14 allegations with regard to Dr. Slayman?

15 A: Well, like I said just a moment ago, I -- you
16 know, they've hired seven superintendents in
17 Chester County. In the last -- the last seven
18 superintendents in Chester County have been
19 hired and fired. The current superintendent
20 that's there right now, her contract ends in
21 June. And she is -- in fact, I was in a
22 meeting with her Wednesday, and they have not
23 contacted her or had any conversation with her
24 about extending her contract. So she's gone.
25 So that'll be the seventh superintendent that's



1 been in Chester County in the last period of
2 time. So it's a revolving door up there.

3 Q: And do you have any other knowledge about the
4 allegations against Dr. Slayman as to any
5 evidence whether to rebut them?

6 A: I don't have any knowledge, other than what I
7 just got through telling you. As far as I know
8 and the working relationship that she's had in
9 the community that I will say, Dr. Slayman did
10 an excellent job. Because the next three or
11 four things I'm gon' tell you, I think they
12 relate to what you just asked me.

13 The state of South Carolina has a fee in lieu
14 of tax agreement with a lot of industries. And
15 the county counsel in every county gets 100
16 percent of the fee in lieu of tax money. They
17 don't have to give a dime to anybody except who
18 they want the give it to. Now, Chester
19 County's unique. There's only about five or
20 six of these school districts in the state that
21 are unique to Chester County and that they have
22 their own taxing authority. So low and behold,
23 the school district gets absolutely nothing.
24 But Dr. Slayman went to County Supervisor Roddy
25 and cut a deal and got 30 percent of every fee



1 and lieu of tax money coming into Chester
2 County. That's a good deal when you don't get
3 anything and you get 30 percent. And that's
4 still in effect because the County Council just
5 voted again on it the other night to continue
6 to give the school district 30 percent of the
7 fee and lieu of taxes. And then Chester County
8 right now with the growth that's getting ready
9 to take place and the industry taking place up
10 there, that's a lot of money.

11 On the other side of this deal, Dr. Slayman
12 came to the Chester Health Care Foundation,
13 which I've told you a few minutes ago I was
14 involved in, and I don't remember exactly this
15 deal, but she got substantial money from the
16 Chester Health Care Foundation to go into the
17 classrooms of the Chester School District to
18 help in the education of these children. I
19 know -- I saw because she invited us to go see
20 it. And it was in place. It was working. The
21 kids and the teachers, we talked to those and
22 we gave her -- or gave the school system
23 tremendous amounts of money, as compared to our
24 foundation. The other thing that she did --
25 there were two other things that I think

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1 that -- you have to take all this, as I said,
2 as a saltshaker -- the school district did not
3 have the money to hire trainers for the
4 athletic programs. They did not have money to
5 buy supplies for the athletic trainers in the
6 school system. She cut that deal. And the
7 health care foundation gave her the money along
8 with the Chester Hospital to fund the trainers
9 that got put in the three high schools. She
10 cut the deal to get the supplies and to remodel
11 the rooms for the trainers to work to take care
12 of the kids. And that didn't come out of
13 taxpayers' money. That came out of foundation
14 money. That came out her ability to
15 communicate with the citizens in Chester
16 County.

17 And the best thing that she did, we had a young
18 man up there, one just recently died too, that
19 had a heart problem. And he was playing
20 football on Friday night, at Chester High
21 School and he died. He died on the football
22 field because nobody had checked him, and his
23 physical exam did not disclose his heart
24 problem. She cut a deal with the Health Care
25 Foundation. I'll make that sound -- that's not



1 really a good way to verbalize it. She came to
2 the Health Care Foundation, and the Health Care
3 Foundation funds the money to check every
4 student that plays sports in Chester County
5 from the eighth grade up to make sure that's
6 now done. And that's not a good steward of the
7 money of Chester County, if that's not a good
8 steward of people looking after the kids in
9 Chester County, I'm sorry. I believe her. I
10 know what she's done. I know that it
11 continues. The athletic trainer program
12 continues, and the screening for the kids for
13 the heart defects continues. And it will
14 continue. I get emotional about it 'cause it's
15 very, very important.

16 Q: Thank you for that information. When you've
17 interacted with Dr. Slayman and other staff
18 members of Chester County School District
19 during the time she was superintendent, what
20 were your observations?

21 A: Well, like I said, most of the interaction I
22 have with Dr. Slayman and others like Dr. Knox,
23 who was the principal down at Louisville High
24 School, Ms. Snipes, who's now the principal at
25 Louisville High School, and the football



1 coaches and the -- and some of the teachers
2 that are originally are from Louisville or from
3 Richburg. And I never heard any complaints
4 whatsoever.

5 The -- and one thing about Chester County too
6 that comes back to your question, Chester
7 County's been 30,000 people since 1900. 30,000
8 people since 1900. That's 120 years with the
9 same thing. Nothing goes on in Chester County
10 that everybody doesn't know about. Everybody's
11 kin to each other. Everybody's -- has
12 knowledge of it. And Dr. Slayman, in the
13 working relationship with the people in the
14 Louisville School System that I had direct

15 knowledge of, I don't think I heard anything
16 ever said bad about her because she looked
17 after the students.

18 Q: And how would -- and I think you've touched on
19 this some, but I want to just ask kind of a
20 general question is: How would you describe
21 Dr. Slayman's relationships with the
22 organizations in the community?

23 A: With ---

24 Q: With community organizations?

25 A: Oh, I think they were great. I mean, she was



1 part of them. She didn't go not participate.
2 Everybody knew who she was. She wiggled away
3 into being the grand marshal of the little fire
4 department Christmas parade, driving the fire
5 truck. We let her drive the fire truck up
6 through there. Obviously, she had connections
7 within the school system within the community
8 that all that occurred. I didn't just say you
9 come drive the fire truck. I mean, that's a
10 little committee where the little group of guys
11 and the ladies in the fire department select
12 who's gon' be the grand marshal. And it's not
13 like Nikki Haley being the ambassador to the
14 United Nations, but it's a pretty good honor
15 for our little community to have her involved
16 in that.

17 Q: During the years that you've known Dr. Slayman,
18 have you ever seen her yell at anybody?

19 A: No.

20 Q: Have you ever seen her threaten anyone?

21 A: Now, I've never seen Dr. Slayman be any way
22 accept professional. Now, getting up, cutting
23 up, kidding about riding down through Main
24 Street in the John Deere Gator to get in the
25 fire truck, that's a lot of slaphappy and



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1 things like that going on.

2 Q: Based on your essentially life-long residence
3 in Chester County and knowing, it seems, a lot
4 of people involved in the county, did you ever
5 observe any type of hostile work environment
6 sourcing from Dr. Slayman's administration?

7 A: No. And like I said, the part of -- the
8 Chester part of it, I wouldn't know an awful
9 lot about. But as far as the Louisville part
10 of it, I've never seen anything or even heard
11 anybody say anything bad about it.

12 Q: And I think that's a good point is that
13 sometimes there's been reference to Chester and
14 Louisville. Are those kind of the two largest
15 towns in the county?

16 A: Well, Chester has -- Chester County has one,
17 two -- five towns. They call Chester a city,
18 but it's really a town. You have the little
19 town of Lowrys. You have the little town of
20 Richburg. You have another little town of Fort
21 Lawn. You have the little town of Great Falls.
22 Like I said, it's about 30,000 people in the
23 whole county, so you don't have an awful lot of
24 that.

25 It's a very small school system. But when you



1 look at the test scores of the school system,
2 there's a certainly disparity between
3 Louisville and Great Falls and Chester. The
4 Health Care Foundation, which, as I've just
5 told you, and the J. Marion Sims Foundation,
6 commissioner surveyed by the University of
7 South Carolina Upstate, to look at the test
8 scores of the kids in -- the J. Marion Sims is
9 a big foundation over in Lancaster. It's part
10 of the Old Springs thing. The commission has
11 studied and they looked at the county and they
12 looked at Lancaster County and looked at
13 Chester County, and they looked at Fairfield
14 County and they looked at the test scores.
15 Now, this was somewhat right after about the
16 time all this -- the test scores come out --
17 came out about the same time Dr. Slayman was
18 probably leaving. But the test scores in
19 Chester County, 80.4 percent of the kids in
20 Chester County cannot read above the third
21 grade level compared to the state.
22 84.7 percent of them in the eighth grade cannot
23 do mathematics above the state level in Chester
24 County. Thank God for Fairfield County 'cause
25 they're at 91 percent on math.



1 But we didn't break it down because we didn't
2 want to -- when you look at it, Louisville
3 scores much, much higher. Much, much higher.
4 They score on the level of Nation Ford High
5 School in Fort Mill where, full disclosure is,
6 my two grandchildren go. One of them's
7 finished now, but the other one's a junior.
8 There's not a comparison. And when you look at
9 the Chester High School and when you look at
10 the Great Falls High School, those test scores
11 are just not there. But the little Louisville
12 school is much better. And all of that was
13 what she was driving toward in working with the
14 community and working with that to try to
15 improve those scores countywide but obviously
16 trying to put the resources into Louisville.
17 So we -- it's some really smart kids that have
18 come out of Louisville and gone on to school.
19 Some really smart kids.

20 Q: Now, I want to ask you a little bit more
21 follow-up about the relationship with the
22 Chester County Sheriff's Office or Chester
23 Sheriff's Office. Is -- what is your knowledge
24 about Dr. Slayman's interaction while she was
25 superintendent with the sheriff's office? Or



1 sheriff's department, excuse me.

2 A: Well, one I just got through saying about a
3 County deputy going to the rotary club and
4 saying what he said, if I were Dr. Slayman, I
5 would have been upset with that. If she heard
6 that directly and I'm under -- my understanding
7 is she was in the room when that statement was
8 made. So I don't know what her relationship
9 was with the sheriff, but according to the
10 paper, there were a number of instances where
11 the sheriff was involved in some issues that
12 forced Dr. Slayman to make some real hard
13 choices about what went on in the -- between
14 the school district and that.
15 And I don't want to get into all that, but
16 it -- you can read the paper as well as I can,
17 between the sheriff and a coach in the school
18 system. The sheriff was involve -- was invited
19 one day -- the only other thing that I could
20 say about that I have direct knowledge of, the
21 sheriff was invited to a security briefing in
22 the school system where everybody in Chester
23 County, every first responder in Chester County
24 was invited to come. And everybody showed up
25 on a shooting incident and how to handle these



1 types of things, and everybody came except the
2 sheriff's office. They did not show up. And
3 so I don't know what her relationship was, but
4 those are the two things that I specifically
5 know.

6 Q: Did Dr. Slayman ever say anything that would
7 have given you the impression that the
8 sheriff's department was excluded from the
9 district, meaning they couldn't come to
10 district events?

11 A: No. She didn't give me any excuse. And then
12 in interest of full disclosure, there was a
13 serious incident with the sheriff with the fire
14 service. And I'll tell you what that is right
15 now. In Chester County when you go out of
16 Chester going to Spartanburg, there is a --
17 it's Highway 9 and there's a curve out there
18 called Dead Man's Curve, everybody in the
19 county knows a Dead Man's Curve. And on a
20 snowy day, there was a wreck in that -- in Dead
21 Man's Curve and a tractor-trailer jackknifed
22 and was off the road, and the fire department
23 was involved in trying to get the driver out
24 and everything. They asked the 9-1-1 dispatch
25 center for a sheriff to send some deputies to



1 direct traffic to try to keep the traffic off
2 the firemen down in the road and all this
3 stuff. And the sheriff refused to send
4 deputies.

5 So at any rate, the chief of the fire
6 department said something on the radio and --
7 to the extent that the next time an election
8 came up -- he shouldn't have said it, but he
9 said it -- that the fire service would remember
10 that he couldn't get any help out of the
11 sheriff's office. A little while later the
12 fire chief was in handcuffs laying on the road
13 in the snow. The sheriff had arrested him.

14 15 or 20 minutes after he was laying in the
15 road with his brother, the sheriff uncuffed him
16 and let the fire chief go back to doing what
17 his job was. That night nine deputies, nine
18 deputies went and arrested the fire chief and
19 his brother, a former Chester County School
20 Board member and a former Chester County
21 Counsel member and put them in jail on Saturday
22 night. And he arrested them one -- 30 minutes
23 after the magistrate had left for the night.
24 So they had to spend the night in jail, and
25 they were not released until Sunday.



1 MR. WINBURN: Jeez.

2 A: Every fire chief in Chester County met. I was
3 the president of the Fire Chiefs Association at
4 that time. They met and they authorized, made
5 a security -- to secure an attorney. We hired
6 Nexsen and Pruet down here in Columbia. And to
7 make a long story short, the attorney general
8 of the state of South Carolina, we sat in a
9 room with him. And six deputy attorney
10 generals, they threw it all out, wiped out
11 every record on it and everything. The fire
12 chief and his brother sued the sheriff civilly
13 and won. We don't have any problems with the
14 sheriff of Chester County and the fire service
15 to this day.

16 So all of that was in the paper. And
17 Dr. Slayman, I'm sure, saw that just as much as
18 we saw the other thing. So in the interest, as
19 I said, full disclosure, sometimes people just
20 don't understand that a fire chief in the state
21 of South Carolina, the law says no man shall
22 interfere with him. No man. Sheriff, nobody.
23 And sometimes they take exception to that.
24 Just like she's a superintendent of the school
25 district. Anybody that's got any sense knows



1 she can't do anything unless she gets four
2 votes from the school board. It's seven
3 members on the school board. You don't --
4 can't count the four -- you learned that in the
5 first grade -- you can't do anything. So
6 everything Dr. Slayman did had to be okayed by
7 the school board.

8 Q: With regard to Defender being hired, some of
9 the grievants seemed to oppose that. Do you
10 have any knowledge about how that hiring of
11 Defender, from a political standpoint, could be
12 connected to a hostile work environment
13 complaint?

14 A: Oh, I don't have any idea other than I know it
15 probably -- we read the sheriff's office case,
16 I mean, I didn't mean to say that. But you
17 have to understand, to come back to what I said
18 a little while ago, Chester County School
19 District is its own taxing authority. The
20 county council does not have to give them a
21 dime. And the Chester County Council voted to
22 allow so many "SROs", as I understand the term,
23 to be put into the school system. But it
24 wasn't very many, because they just approved a
25 fourth one the other night. So the school



1 district was totally responsible for hiring the
2 security for the school system. They'd had to
3 pay the county council or pay the SROs out of
4 their own pocket to pay for all this stuff. So
5 I have no idea why she hired security, other
6 than whatever it was. But she didn't have to
7 hire the SROs. I mean, the county council
8 wasn't gon' pay for it.

9 Q: And during the times that you've spoken with
10 Dr. Slayman during her time as superintendent,
11 did she say any negative remarks about her
12 senior staff?

13 A: I've never heard her say anything about it.

14 Q: And did she ever ask you any advice on
15 decisions that, say, a senior staff member
16 would be making within the district?

17 A: No. I mean, no. I've -- I wasn't never
18 superintendent, but I used to have a whole lot
19 of people that worked for me at the Department
20 of Mental Health. And I wouldn't ask anybody
21 what some -- how to run my department.

22 Q: And to your knowledge, were there any
23 relationships that existed between the members
24 of Dr. Slayman's senior staff and the sheriff's
25 department?



1 A: Other than what I said, there -- at least one
2 of them, Ms. Stroud's husband works directly
3 for the sheriff's department. And I don't know
4 about the rest of them. I don't -- other than
5 giving money, I don't know. But one of them's
6 husband is a -- is now a bailiff for the
7 sheriff. He used to be a police officer with
8 the sheriff's department. He's a bailiff now,
9 as I understand it.

10 Q: And there's been an inclination made that
11 somehow Dr. Slayman selected the security group
12 because of a dislike of the sheriff's office.
13 Do you believe that to be the motive why the
14 school district selected Defender ---

15 MR. WINBURN: I'm gonna object.

16 A: I have no knowledge of how that would be.

17 MR. WINBURN: That's fine. We'll leave it. It just
18 calls for speculation.

19 MS. POLVI: I now can move on. I think your answer
20 covered probably the same of what your
21 objection was.

22 MR. WINBURN: I'm fine with his answer.

23 Q: Prior to the grievance, which I think you've
24 identified that you read about in the media,
25 did you have any observations of Dr. Slayman's



1 interactions with the school district, any
2 staff that would give you an inclination that
3 there was any type of hostile work environment?

4 A: No.

5 Q: And as a leader in the community, did you
6 attend different events with employees in the
7 school district?

8 A: If they were Louisville, I would have been
9 there. But like I said, there's a number of
10 them I have no idea who they are.

11 Q: And I think I already asked this, but I just
12 want to make sure that I did. Did you ever
13 hear Dr. Slayman make any remarks that you
14 believe are of a threatening nature?

15 A: That a what now?

16 Q: Did you ever hear Dr. Slayman make any remarks
17 that are of a threatening nature?

18 A: No.

19 Q: Did you ever hear Dr. Slayman, in kind of her
20 normal communications, say anything like
21 cutting people's knees out from under them or
22 ripping their throat out or killing them?

23 A: No. I've never heard anything. In fact, the
24 only thing that I've ever heard about
25 Dr. Slayman is from Ms. McCrory, who was a



1 school board member, who I grew up with, who I
2 went to high school with, and who lives right
3 next to the fire department basically and said
4 how wonderful her job was done and that she
5 supported Dr. Slayman and what she was doing in
6 the school system. Ms. Hensley, she's -- she
7 changed -- obviously married so ...

8 Q: And as a community member, do you think the
9 school district improved under Dr. Slayman's
10 leadership?

11 A: I'm sorry?

12 Q: As a community member, do you think the school
13 district improved under Dr. Slayman's
14 leadership?

15 A: Oh, it definitely was -- how do you get -- yes.
16 She was able to communicate with people that
17 were gonna support her and put money to the
18 school system. And that occurred.

19 Q: And I think you've already discussed some of
20 the Health Care Foundation in your earlier
21 testimony, but is it accurate to say that
22 that's largest philanthropic organization in
23 Chester County?

24 A: Yes.

25 Q: And prior to Dr. Slayman being able to work out



1 the contributions that would help the school
2 district, had that been done by previous
3 superintendents?

4 A: Not to my knowledge. The Health Care
5 Foundation began sometime in 2005 when we
6 leased the hospital, and that's where the money
7 came from that, to back up just a touch. Part
8 of Chester County is serviced by the J. Marion
9 Sims Foundation. The Great Falls area and the
10 Fort Lawn area are funding areas of the J.
11 Marion Sims, so technically the Chester Health
12 Care Foundation would be the largest foundation
13 in Chester County. But the J. Marion Sims, if
14 you looked at how much money they gave Great
15 Falls, it would be X, but their funding base is
16 much larger than the Chester Health Care. They
17 got about \$80 million.

18 Q: With Dr. Slayman being involved with kind of
19 what's called this breakfast club, did her
20 involvement in the community and community
21 leaders benefit the school district, based on
22 your personal observations?

23 A: Well, there's a whole bunch of people come and
24 sit down at that table about every morning, and
25 they're all basically wanting something. And



1 it's a smart place to come sit down and learn
2 about baling hay and raising cows and fighting
3 fire.

4 Q: With regard to Dr. Slayman, is there anything
5 that, you know, you know of that's important
6 for Ms. Pike to know in her deliberations over
7 this disciplinary issue?

8 A: Well, as I said to say this, Chester County's
9 a very small area. Tuesday night the zoning
10 board of appeals approved the construction of
11 295 homes in Richburg. 295 homes, which are
12 gonna -- right now are projected at one student
13 per household. There's probably more than
14 that, but we projected one student per
15 household, two voters per household. Right
16 cross the street, the board of appeals has
17 approved the construction of 100 apartments and
18 a three-rise -- three-story-rise apartment
19 complex. And three miles up the road, they
20 have approved 595 additional homes. So for the
21 first time since 1900, Chester County has the
22 potential to grow. This woman was taking the
23 school system, in John Agee's opinion, in the
24 direction that it needed to be going in.
25 I really don't want to throw rocks in my glass



1 house. That's one of my favorite expressions.
2 You can't build a house without building a
3 foundation. And what Dr. Slayman was doing, in
4 my opinion, she was coming in, working within
5 the community, starting that foundation up
6 under that house, up under that school system
7 where we don't have 80-something percent of the
8 kids that can't read above the third grade
9 level or 84 percent of the kids that can't do
10 mathematics.

11 Now, my family is very fortunate. My mother
12 was a physical therapist in the '40s. My dad
13 was an alcoholic. My mama busted her butt to
14 educate my brother and my sister. Now. We
15 have six children. Three lawyers, a doctor, an
16 architect, and a CPA out of that little family
17 that went through this little school system in
18 Chester County. If you don't think I'm not
19 interested in it, you would be making a
20 mistake.

21 In my opinion of her is she was building that
22 foundation. Seven superintendents can you
23 imagine trying to go through that? The problem
24 is Wilbur Grant, Senator Grant messed us up
25 years ago. There has to be an accountable



1 person that looks after stuff. In Chester
2 County, we have a supervisor form of
3 Government. That means we elect the county
4 supervisor. And the guy that's in there now
5 has done a great job, but he's got a high
6 school education. I'm not throwing rocks at
7 him again.

8 The school board is a seven-member board. It
9 used to be bipartisan, and Linda Short, Senator
10 Short changed it to a nonpartisan race. And
11 our school board Chairman wants to be the
12 supervisor. Now, this is all John Agee's
13 opinion. You asked me. And instead of letting
14 the superintendent, who has to have the
15 qualifications and the credentials to be that
16 run the school, they want to run it. Now, you
17 got the two cents' worth. You got me up on my
18 stump, and I gave it to you.

19 You cannot educate kids if you don't teach them
20 in the classroom and want them to learn. If
21 you want them to learn, they know it, and they
22 will learn it. And, you know, that's ...

23 I care. It's right there. And I put my two
24 cents every day in my community.

25 Q: Thank you, Mr. Agee. I may have follow-up, but



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1 Mr. Winburn has an opportunity to ask you
2 questions, and Ms. Pike may have questions for
3 you as well.

4 **MR. AGEE - CROSS-EXAMINATION BY MR. WINBURN:**

5 Q: Mr. Agee, my name's Scott Winburn. I am a
6 lawyer for the Department of Education. When
7 you said that Chester had about thirty -- 20-
8 or 30,000 people, you had me there. I grew up
9 in Marlboro County ---

10 **HEARING OFFICER:** Wait a minute. I don't think we
11 ever swore Mr. Agee in.

12 **MR. WINBURN:** Oh, that's good.

13 **MS. MOORE:** I just realized that.

14 **HEARING OFFICER:** We need to do that.

15 **MS. POLVI:** Yes, yes, yes. I guess we're gonna put
16 on the record is it understood that your
17 testimony for the whole duration is
18 considered --

19 **THE WITNESS:** That's why he's here.

20 **MS. POLVI:** Yes.

21 **JOHN AGEE,** having been duly sworn for previous
22 testimony and as follows:

23 Q: Marlboro, I believe, is probably held steady at
24 about 29,000 people for over a hundred years as
25 well. So I'm quite familiar with small towns.



1 I grew up there, went the high school there.
2 We had one high school. I just wanted to
3 introduce myself so you knew who you were
4 talking to. I've been with the Department and
5 a lawyer for Molly Spearman for about three
6 years. So just for fun, can you describe where
7 this breakfast club meets? I -- and do y'all
8 sit at the same table?

9 A: Richburg is a big place. The town of Richburg
10 is a small place.

11 Q: Yeah.

12 A: The town of Richburg -- and I will get to your
13 point -- has about 165, 170 people in it. The
14 community of Richburg is this big place, and
15 it's the school district. The school system is
16 Richburg. It is -- the Louisville School
17 District is Richburg. I-77 runs right through
18 Chester County and Highway 9, which comes
19 through Marlboro ---

20 Q: Uh-huh.

21 A: --- crosses there. And right there are the
22 truck stops, the McDonald's, the Burger Kings,
23 the Kentucky Fried Chicken and everything.

24 Q: Right.

25 A: And there's a little local restaurant there at



1 the truck stop and it's named The Country
2 Omelet.

3 Q: Right.

4 A: That it's been run by the same guy for
5 20-something years and his family. And we meet
6 there. We have the same waitress that pretty
7 much takes care of us all the time. We don't
8 complain about the food, 'cause if you complain
9 about the food, you might not get any the next
10 day.

11 Q: Understood.

12 A: The price is set because he got tired of having
13 to argue about what charge to us, so we all pay
14 a set fee. And so the boy that runs it, he's
15 in the fire department. So kind of everybody
16 in the community is part of the fire
17 department. So each person has their own
18 specialties of what they do and how they
19 contribute. So that's kind of how it's done.
20 So if you want to have breakfast in Richburg
21 and you want to be a part of that, not
22 necessarily a part of the breakfast club, but
23 if you want to have breakfast, it's not any
24 place to go except you can go to Mickey D's and
25 get a biscuit or you can come to an omelette



1 and sit down and get eggs and grits and bacon.
2 Q: Right.
3 A: And that's what it is, just a local ---
4 Q: How many people do you think are in your -- at
5 your table?
6 A: It can be anywhere from 4 to 10 or 12.
7 Q: And y'all sit at the same spot every time?
8 A: Same spot. Everybody's got a pecking order.
9 I've got the same seat.
10 Q: Are you at the head of table?
11 A: No.
12 Q: Okay.
13 A: No.
14 Q: That's -- I don't want to ---
15 A: The coroner's the ---
16 Q: Well, you don't want -- got it.
17 A: You laughing, so I'm laughing.
18 Q: No. I like it.
19 A: For the sake of argument, the coroner, Chester
20 County Coroner, who is the most powerful person
21 in Chester County ---
22 Q: Uh-huh.
23 A: --- he sits there (indicating). The head
24 farmer sits here, and I sit right here
25 (indicating). Charlie Barber, another farmer,



1 he sits right there (indicating). The goat
2 farmer sits right there, and sometimes a lawyer
3 will sit there. Sometimes another lawyer will
4 sit there. Sometimes the judge will sit there.

5 Q: Right.

6 A: So it's kind of a -- but I'm gon' sit in my
7 spot.

8 Q: I understand.

9 A: The coroner's gon' sit there so ...

10 Q: I just wanted to set the scene. And how -- is
11 this every day, every morning?

12 A: Basically five days a week. It's a certain
13 group of people on Saturday. We bring the
14 funeral director in. He comes in and then one
15 of the radio guys for the Department of
16 Transportation. And then on Sundays it's
17 usually the farmer and myself, and we get to
18 talk fire because he's the fire guy at the
19 neighboring department.

20 Q: Right. And I don't want you to misunderstand
21 that -- I am not making fun. There was a place
22 in Bennettsville called Nick's, and he was one
23 of the, you know, the small town that -- in the
24 old days you'd call him the Greek or -- it was
25 a Greek gentleman. And if -- he was gon' give



1 you whatever he wanted to give you to eat so
2 you -- and there was a contingency of gentlemen
3 who would eat there daily. So I'm quite
4 familiar with that. I just wanted to set the
5 scene 'cause there had been some testimony
6 about it, and I wanted to make sure I could
7 picture it in my mind.

8 How often would Dr. Slayman attend?

9 A: Maybe couple or three times a week. It
10 wouldn't be every day but a couple to three
11 times a week.

12 Q: And how far is Richburg from -- how long does
13 it take you to get from Richburg where the
14 Country Omelet is to downtown Chester?

15 A: 10 minutes, 12 minutes.

16 Q: Okay. Now, does the current superintendent,
17 does she meet with you, Dr. Bain?

18 A: No. She lives just right up the street. She
19 lives almost across from where Dr. Slayman used
20 to live. She doesn't come, obviously.

21 Q: Okay. Oh, why do you say it that way?

22 A: Well, she and I are very good friends. And
23 but, you know, the ramifications of the
24 foolishness, in my opinion, that have been in
25 the paper, it just doesn't benefit her. But



1 she and I -- when a meeting Tuesday and talking
2 the growth of Richburg and these house and
3 stuff. So she's a very nice lady. I like her
4 a lot. She rides a motorcycle so what's there
5 not to like.

6 Q: Did not know that. You never know what you're
7 gonna hear. That's good.

8 A: You can't ask me something about people that
9 live in Chester County because I pretty much
10 know them all.

11 Q: I get it. Okay. How did you prepare for your
12 testimony today?

13 A: I didn't prepare anything other than I talked
14 with Cyrus.

15 Q: All right. Did you talk with Dr. Slayman a
16 little bit?

17 A: I talked with her because I asked her where I
18 needed to come. But basically that's about the
19 only thing. But I hadn't had any conversations
20 with her. Like I told you, I have a
21 professional relationship with Dr. Slayman.
22 And the best thing to do in these kinds of
23 things -- and obviously, I just told you a
24 little while ago I worked for the Department of
25 Mental Health. So this is not an unknown --



1 this meeting right here is not an unknown
2 entity.

3 Q: Understood. Did you talk with Ms. Polvi about
4 your testimony?

5 A: I'm sorry?

6 Q: Have you talked to Ms. Polvi about your
7 testimony?

8 A: I met Ms. Polvi the other day when she came
9 down and saw me in the conference room
10 downstairs, and that's the only time I've ever
11 met her.

12 Q: Okay. Fair enough. As I understand your
13 testimony -- I'm sort of paraphrasing -- you
14 were asked generally some questions about her
15 relationship with -- Dr. Slayman's relationship
16 with some of the folks who filed the grievance.
17 As I understood it, you said you weren't sure
18 how she ran her job, you know. You don't have
19 any direct testimony to provide the hearing
20 officer about how Dr. Slayman basically
21 interacted with those individuals; is that fair
22 to say?

23 A: That's correct.

24 Q: Okay. Now, that -- as I understand your
25 testimony, again, correct me if I'm wrong, you



1 testified similarly about Dr. Slayman's
2 relationship with the sheriff. Is it fair to
3 say that you didn't know the precise -- the
4 nature of the relationship?

5 A: No. if it wasn't in the paper, I wouldn't know
6 anything about that.

7 Q: Okay. Now, you did mention something, I
8 believe, about the sheriff and a coach. What
9 were you referring to?

10 A: There was an article in the paper where a
11 coach -- the cheerleader coach -- a mother of
12 a cheerleader took her child to Dr. Slayman's
13 office -- and I don't remember every little
14 detail -- but made some allegation that the
15 sheriff and the cheerleader coach were involved
16 in some kind of relationship.

17 Q: Okay.

18 A: And the cheerleader coach resigned.

19 Q: Okay. And that is the extent of your
20 knowledge?

21 A: That's the extent of my knowledge.

22 Q: Okay. Mr. Agee, would you consider yourself a
23 character witness for Dr. Slayman today?

24 A: I don't ---

25 MS. POLVI: And I'm gonna just put an objection ---



1 A: --- that I know her character ---

2 **MS. POLVI:** Quick thing, Mr. Agee.

3 Just an objection is he's testified to facts.
4 I mean, just to ascertain what type of witness
5 he is, I don't think he can testify to that
6 effect. But if he's -- can testify to -- that
7 he's also providing character. But he's
8 testified to factual.

9 **HEARING OFFICER:** He did testify to facts. I'm
10 gonna overrule that objection.

11 **MR. WINBURN:** Right.

12 Q: Well, I'll put up a little bit -- I'll ask you
13 a different way. What -- you testified just a
14 minute ago that you have no testimony to
15 provide here today about Dr. Slayman's
16 relationship with Anna Stroud, Jeff Gardner,
17 Charles King. I believe the mentioned Brooke
18 Clinton, and those individuals; is that
19 accurate?

20 A: Yes.

21 Q: Okay. And you mentioned Shawn Williams, but
22 I -- if I'm -- heard correctly, Ms. Polvi never
23 called her by name. How do you know about
24 Ms. Shawn Williams?

25 A: I thought she said Ms. Williams.



1 MS. POLVI: I did.

2 MR. WINBURN: Okay.

3 Q: Well I may -- what do you know about
4 Ms. Williams?

5 A: I have no idea who she is.

6 Q: Okay. All right. I think that's all I have.

7 MR. CORBETT: If it would be all right, may I ask
8 some questions on his behalf?

9 MR. WINBURN: No.

10 MR. CORBETT: Okay.

11 MR. WINBURN: I'm sorry.

12 MR. CORBETT: That's fine.

13 MR. WINBURN: I mean, if there's anything you need
14 to clear up, that's fine. But since you're not
15 a party ---

16 MR. CORBETT: It was strictly clarifications about
17 the breakfast club but if ---

18 MR. WINBURN: Okay. Well, yeah. I mean ---

19 HEARING OFFICER: And I may hit them.

20 MR. WINBURN: Yeah, she may.

21 HEARING OFFICER: So just ---

22 MR. CORBETT: Okay.

23 HEARING OFFICER: Give me just a second here and let
24 me ---

25 MR. WINBURN: Sorry.



1 **MR. CORBETT:** You're fine. I should have checked
2 before.

3 **MR. AGEE - EXAMINATION BY THE HEARING OFFICER:**

4 **HEARING OFFICER:** You mentioned that Chester County
5 had hired seven superintendents, counting
6 Ms. Bain.

7 A: I'm sorry. I don't have my hearing ---

8 **HEARING OFFICER:** You mentioned that Chester County
9 had hired seven superintendents, including
10 Dr. Bain. And, of course, Dr. Slayman is one
11 of those. Can you give me just a little bit of
12 background as to why there's such a turnover in
13 the superintendents in Chester County?

14 A: I thought I said that. But to clarify what I
15 think is you have a school board that has no --
16 they're not answerable to anybody. They were
17 created by Wilbur Grant as a
18 special-purpose-type district years ago that
19 they elect seven board members. And then they
20 elect a chairman out of that seven. It used to
21 be a bipartisan school board, Republicans,
22 Democrats. They had a lady on there that
23 worked for the Department of Social Services.
24 She would not resign. Somebody forced the
25 issue she had to resign, so she went to Judge



1 Short. Judge Short introduced legislation in
2 the legislature and change the school board
3 from a partisan to a nonpartisan race. She's
4 right back on the school board.

5 You have a group of people that care -- I'm not
6 saying they don't care. But you have
7 Ms. Hensley, who was the principal at
8 Louisville Elementary for many, many years.
9 Got on the school board. And she, I thought,
10 did a real good job at trying to hold
11 accountable working with Dr. Slayman. You had
12 a gentleman that got elected to the school
13 board this last time, and he had an axe to
14 grind, Dr. Hughes. And the people that caused
15 all this are not here, these people that you're
16 dealing with. But you had Dr. Hughes on the
17 school board.

18 So at any rate, you got seven board members up
19 there that know everything about education.
20 And they go hire a superintendent and get them
21 to come in. And then they won't let them do
22 their job. When they told people accountable,
23 and you're supposed to work and give a fair
24 day's work for a fair day's wage, they might
25 not necessarily be the case in John Agee's



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1 opinion.

2 There's -- it's just like I said a few minutes
3 ago, there's hardly anybody you can ask me
4 about in Chester County that I don't have some
5 knowledge of. And that is getting ready to
6 change. That is getting ready to change.
7 You're getting ready to have 1200 homes, 2400
8 more adults, and a whole bunch more kids. And
9 these people are gon' come into Chester County
10 are gon' be like the people coming into Indian
11 Land, like the people coming into Fort Mill.
12 They're going to hold these people accountable.
13 When the 2020 census takes place, it's going to
14 change. So she -- to -- it -- they just won't
15 let him do his job.

16 **HEARING OFFICER:** Back up and tell me who -- again,
17 who it is that appoints the school board
18 members? Who it is that appoints the school
19 board members again?

20 A: They all run for election.

21 **HEARING OFFICER:** Oh, they now run for election?
22 But previously you said they were appointed
23 by ...

24 **MR. WINBURN:** Can I?

25 **HEARING OFFICER:** Yes.



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1 **MR. WINBURN:** I think so that the County manager --
2 I think who you are testifying to that is
3 popularly elected. But these seven districts,
4 are they -- there's no are there any at-large
5 members?

6 **THE WITNESS:** One of them's at large, but they elect
7 their own chairman. In other words, the County
8 supervisor runs, and he runs at large. And
9 what he -- when he gets elected, he is the
10 boss.

11 **Q:** Okay.

12 **A:** He sets the agenda. He sets the budget. He
13 hires and fires all the people that work for
14 the County. The County council has really
15 nothing to do with it. They -- once they
16 approve the budget, then for the sake of
17 argument, they're out of it. School board's
18 completely different. Now, the school board,
19 in my opinion -- and I have one of those -- the
20 chairman wants to be like him. But you can't
21 be -- by State law, thank God, the Department
22 of Education sets the credentialing of these
23 people. And they have to have a certain
24 education. They have to have a certain
25 background. They have to go through all this



1 stuff. It's no different from when I was a
2 dietitian. You have to pass all these exams
3 and all this stuff. And but the problem is the
4 school board, in my opinion again, won't let
5 them do the job. If you go in there and you
6 hold Bessie Sue accountable and say, hey, you
7 got to work, and she goes to the chairman and
8 the chairman comes back and says, Dr. Slayman,
9 you can't make her do that. But what's she
10 gon' do?

11 Q: Was Dr. Slayman the only female that attended
12 your breakfast club?

13 A: Oh, no, no. We're nondiscriminatory. We may
14 have -- it's several other ladies within the
15 community. Nurses that come in and get off on
16 a third shift and come in and eat breakfast.
17 Jay's wife may come. My wife won't get up that
18 early. You know, I mean, it's -- it can be
19 anybody. There's no agenda to the breakfast
20 club. He loves doing woodworking and he comes
21 in occasionally and tells us what he's done.
22 And so, you know, it's not anybody -- he just
23 described it in Bennettsville. This goes all
24 over the United States. This is not -- it's
25 like going to the beauty shop. I don't mean



1 that -- please don't that out of -- any
2 derogatory comment. But it's no different than
3 you going to the beauty shop and sitting around
4 talking about whatever.

5 Q: Columbia had its own breakfast club at the
6 Elite Epicurean Restaurant years ago. I always
7 knew that I could find my father there if I
8 needed him. That was a for-sure thing. So I
9 get it. I understand.

10 Let me see if there was anything else that I
11 wanted to ask you. I think that was it.
12 Was there any follow-up for each of you?

13 **MR. WINBURN:** Did you want to speak outside about --
14 it doesn't matter.

15 You want to go off the record for just a
16 second?

17 **HEARING OFFICER:** Yeah, let's go off the record.

18 **(Off the record.)**

19 **MR. AGEE - REDIRECT EXAMINATION BY MS. POLVI:**

20 Q: So just a brief follow-up with regard to the
21 breakfast club. Is there any reason to believe
22 that the breakfast club had any connection to
23 any of the individuals who attended, any
24 connection to Defender?

25 A: I personally don't. And I would find it hard



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1 to phantom what I know about the people that
2 are there that they would have any kind of
3 relationship with that. I don't even know who
4 they were. But to my knowledge, I can't
5 imagine they would have any.

6 Q: And to your knowledge, did anyone that attends
7 the breakfast at the Country Omelet benefit
8 from Defender being selected as security over
9 the SROs with the sheriff's department?

10 A: No. I'd certainly didn't.

11 Q: And I think it's clear on the record but just
12 to confirm, you -- earlier in your testimony
13 you referenced a fire chief who was arrested
14 and had the lawsuit. Fair to say that was not
15 you?

16 A: No. That was a fire chief of the West Chester.
17 His name was Andrew Martin and his brother
18 Tommy Martin. And Tommy was the former Chester
19 County School Board member, and he left the
20 school board and was elected to the County
21 Counsel.

22 Q: Okay. Thank you.

23 **HEARING OFFICER:** Anything else?

24 **MR. WINBURN:** Nothing from the Department.

25 **HEARING OFFICER:** All right. Thank you very much



1 for coming.

2 (Witness excused.)

3 (Off the record.)

4 **BILL BUNDY**, having been duly sworn, testifies as
5 follows:

6 **MR. BUNDY - DIRECT EXAMINATION BY MS. POLVI:**

7 Q: Good morning, Mr. Bundy.

8 A: Good morning.

9 Q: My shame is Shannon Polvi. I'm with Cromer,
10 Babb, Porter & Hicks, and I'm representing
11 Dr. Slayman.

12 A: Sure.

13 Q: And we've identified you as a fact witness with
14 some information relevant to the disciplinary
15 proceeding with regard to the Department of
16 Education.

17 A: Okay.

18 Q: So first before I get into the specifics, I
19 want to get a little background on you. What
20 are your professional credentials?

21 A: Obtained a BS degree in pharmacy from USC and
22 practiced and -- at Chester County Hospital as
23 director of pharmacy and then returned to Duke
24 University and obtained an MHA and retired
25 after 30 years. And now I am president of the



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1 Chester Health Care Foundation.

2 Q: And please tell us a little bit about the
3 Chester Health Care Foundation.

4 A: The Chester Health Care Foundation evolved in
5 October of 2004 from the sale of the Chester
6 County Hospital and Nursing Center, and the
7 assets are used for distribution in Chester
8 County for health care services or projects.

9 Q: How do you know Dr. Slayman?

10 A: I knew Dr. Slayman because of her position with
11 the school system and in regards to working
12 with her on their seeking grants for health
13 care services in the school.

14 Q: And tell us a little bit more about the grants
15 that Dr. Slayman sought to obtain.

16 A: Well, I think we, over her time, approved
17 around \$150,000 for the school system. One
18 program I remember is a program called, CATCH,
19 C-A-T-C-H, for Coordinated Approach to
20 Childhood Health. And we worked with them on
21 that and then numerous other smaller
22 minigrants.

23 Q: And what is the CATCH program? What
24 essentially benefits does it have?

25 A: Well, it essentially -- the students are



1 continuously moving and exercising while
2 learning and involved various equipment and
3 pieces of equipment and -- but it was really a
4 very good program.

5 Q: And how long have you resided in Chester
6 County?

7 A: Essentially all of my life with the exception
8 of ten years when I lived in Winnsboro.

9 Q: And relatively nearby. With regard to the time
10 frame that Dr. Slayman was superintendent, did
11 you reside in Chester County?

12 A: Yes.

13 Q: And ---

14 A: I think so. We relocated to Chester in 2015.

15 Q: So during the time frame that you observed
16 Dr. Slayman as superintendent, what were your
17 observations?

18 A: I thought she was extremely professional. I
19 thought she was -- first of all, I think she's
20 a good friend, and I think she provided good
21 leadership. I was unaware of the accusations
22 until the press -- essentially reading them in
23 the press. So I come to the situation very
24 surprised at the allegations. It was the
25 opposite of the individual that I knew and



1 worked with.

2 Q: And for our benefit, how much did you interact
3 with Dr. Slayman while she was superintendent?

4 A: I would say weekly. I also, because of my
5 position, served as chairman of the school
6 system's public education foundation and
7 working with her on teaching -- teacher
8 minigrants and scholarships and other such
9 issues.

10 Q: When you were involved as chairman and
11 essentially helping with the teacher
12 minigrants, did you also interact with other
13 school district staff ---

14 A: Uh-huh.

15 Q: --- in addition to Dr. Slayman?

16 A: Yes.

17 Q: And how would you describe her interactions,
18 meaning Dr. Slayman, with other staff when you
19 were present?

20 A: From my observations, I thought they were
21 smooth and well.

22 Q: When you were involved with the school
23 district, did anyone ever come to you with any
24 concerns about Dr. Slayman?

25 A: No.



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1 Q: And has anyone ever come to you about any
2 concerns about Dr. Slayman?

3 A: No.

4 Q: Have you ever seen Dr. Slayman yell at anyone?

5 A: No.

6 Q: Have you ever seen Dr. Slayman threaten anyone?

7 A: No.

8 Q: And with regard to Dr. Hughes, Dr. Rick Hughes,
9 do you know Dr. Hughes?

10 A: I do.

11 Q: And do you know him to have been the individual
12 who's on school board during some of the time
13 Dr. Slayman was superintendent?

14 A: Yes.

15 Q: And do you have any knowledge about any
16 influence he had with regard to Dr. Slayman?

17 A: It is my understanding that he was a key piece
18 in the ultimate results.

19 Q: And what knowledge do you have to base that on?

20 A: Essentially press reports and relationships
21 with other people in Chester.

22 Q: Did you observe any changes in the school
23 district when Dr. Hughes joined the school
24 board?

25 A: No.



1 Q: And do you know of any connection he has with
2 the sheriff's department?

3 A: I know that he served as the jail physician.

4 **HEARING OFFICER:** The what position? I'm sorry.

5 **THE WITNESS:** I'm sorry. He was a physician at the
6 jail.

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

8 Q: And that's connected with or run by the
9 sheriff's department?

10 A: Correct.

11 Q: Based on your knowledge, did Dr. Slayman try to
12 work with the sheriff's department?

13 A: From my observation, she did.

14 Q: And did she ever say anything adverse to the
15 sheriff's department when you were present?

16 A: No.

17 Q: Do you have any knowledge about why the school
18 board was considering a outside security group?

19 A: Just general information really. I know that
20 they had the SROs provided by the sheriff's
21 department. My understanding is essentially a
22 business decision of what was most economical
23 for the school system.

24 Q: When you have had interactions with the Chester
25 County School District, did you also have



1 interactions with kind of what people would
2 consider the senior cabinet, higher leadership?

3 A: Essentially, yeah. Uh-huh.

4 Q: How often your interact with them?

5 A: Just really upon their request for grants,
6 whatever frequency that was.

7 Q: Did you ever have any indication that there was
8 any type of hostile work environment sourcing
9 from Dr. Slayman's leadership?

10 A: Not from my observations.

11 Q: And is it accurate to say that you attended
12 events such as like the Chamber of Commerce
13 dinner ---

14 A: True.

15 Q: --- that Dr. Slayman would have attended with
16 the senior cabinet?

17 A: Correct.

18 Q: Did you ever observe any type of appearance
19 that there was any type of morale issues or
20 discontent between Dr. Slayman and her
21 leadership?

22 A: Not from my observations. As I stated, I was
23 quite surprised.

24 Q: Did you ever hear Dr. Slayman make any type of
25 offensive statements to anybody?



1 A: No, I didn't.

2 Q: I'm going to ask you a little bit more about
3 the Chester County -- or Chester Health Care
4 Foundation. Has the foundation provided funds
5 that have helped the District?

6 A: Yes.

7 Q: And did those type of funds help fund athletic
8 supplies and trainers?

9 A: Uh-huh, yes.

10 Q: And who asked for that funding?

11 A: Usually it was either the -- well, it was not
12 the -- really the coach. It was the athletic
13 trainers.

14 Q: And did you ever see other school district
15 leadership when Dr. Slayman was superintendent
16 when she was not present?

17 A: Yes.

18 Q: And did any of them ever bring any concerns to
19 you about her?

20 A: No.

21 Q: And did they act in any way scared or outside
22 of the norm in demeanors when you interacted
23 with senior cabinet?

24 A: Not from any observations.

25 Q: And did any of the staff that you interacted



1 with ever report any type of concerns about
2 Dr. Slayman?

3 A: Not to me.

4 Q: We've covered a lot of the key things that I
5 wanted to ask you about. Is there anything
6 that you have personal knowledge about that you
7 feel I have not asked about that would be
8 relevant for Ms. Pike to consider in his
9 disciplinary hearing?

10 A: I would -- again, do not mind stating that I'm
11 here on behalf of Dr. Slayman. But I found her
12 to be, as I said, professional, with a great
13 deal of integrity. And, again, in interacting
14 with her staff and principals and coaches and
15 all the various individuals that requested
16 grants, again, there was never any indication
17 to me of any problems that existed.

18 Q: Thank you. And I may have some follow-up.

19 A: Okay.

20 Q: But Mr. Winburn and Ms. Pike may have questions
21 for you.

22 A: Okay.

23 **MR. BUNDY - CROSS-EXAMINATION BY MR. WINBURN:**

24 Q: Mr. Bundy, may name's Scott Winburn, a lawyer
25 with the Department. I just have a few follow-



1 up questions. I think you mentioned that you
2 interacted with senior staff as far as the
3 grants that you had helped administer were
4 concerned; is that right?

5 A: Correct.

6 Q: So it's \$150,000 over how many years?

7 A: I'd say three, four, three or four years.

8 Q: Okay. How much were the grants generally if it
9 was a general number, three or four?

10 A: Well, there's really not an average number.
11 Again, the CATCH program was approximately half
12 of that figure. Well, maybe even more. We
13 were just very dedicated to that initiative,
14 wanted it expanded into each of the schools.
15 But, you know, the grants ranged from a
16 thousand dollars for individual teacher
17 requests to around 5- or \$7500 for the athletic
18 trainers for their supplies. And, you know,
19 it's just a odd and various number. I don't
20 know if we really have an average grant amount.

21 Q: And that's what I'm getting at is how often
22 were you actually in the office where the
23 senior staff's offices would be?

24 A: I'd say just once a month.

25 Q: And how long would you stay in that office when



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1 you were -- would this be for like a meeting?

2 A: Probably so.

3 Q: Okay. And generally who would you meet with?

4 A: Either the associate superintendents or the
5 principals. I met with Ms. Ligon as the chief
6 nursing individual or health contact there at
7 the schools. But just various and sundry
8 individuals.

9 Q: Right.

10 A: Just based on nature of the request, really.

11 Q: Sure. But in general, these meetings, these
12 once-a-month meetings, would they be all day,
13 half a day?

14 A: Oh, no, no, no. No. I'd have a standing --
15 based on my career, I've had a number of
16 meetings. I do not -- I believe any meeting
17 that -- can be accomplished within an hour.

18 Q: Okay.

19 A: And if not, then it can be continued at a later
20 date.

21 Q: I think my boss would agree with that idea.

22 A: It's just -- that's my way. Again ---

23 Q: Her name is Cathy Hazelwood.

24 A: I'll give it an hour and that's it. Otherwise
25 it's general discussion.



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1 Q: Understood, understood. I'm I take the same
2 sort of approach with witnesses too, so I'll be
3 quick.

4 Any -- let's see. You mentioned observations,
5 I believe, with regard to Dr. Slayman's
6 relationship with the sheriff. What kind of
7 observations would you be referring to ---

8 A: Now, I've really never observed her with the
9 sheriff.

10 Q: Okay.

11 A: And really did not have knowledge of any
12 relationships that she had with the sheriff.

13 Q: Okay. Give me one second. I think that's all
14 I have.

15 A: Okay.

16 **MR. BUNDY - EXAMINATION BY THE HEARING OFFICER:**

17 **HEARING OFFICER:** Is it Dr. Bundy?

18 A: No.

19 **HEARING OFFICER:** Mr. Bundy. Okay.

20 A: Yes.

21 **HEARING OFFICER:** All right. Mr. Bundy, I have one
22 question.

23 A: Okay.

24 **HEARING OFFICER:** You mentioned that Dr. Rick Hughes
25 was on the school board?



1 A: Yes.

2 **HEARING OFFICER:** And you also mentioned that he was
3 a key piece in the ultimate result. Can you
4 explain that a little bit more?

5 A: Well, let's go down this path. When we moved
6 to Chester in 2015, we purchased Dr. Hughes'
7 house.

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

9 A: At which time he relocated to White Mountain,
10 North Carolina. And it was my personal
11 impression that at that time he should have
12 removed himself from the school board because
13 of not being a county resident.

14 But back to your question, Dr. Hughes and I
15 have a long-term relationship from my role as
16 CEO with the hospital in his -- as the
17 emergency room physician. I personally feel
18 that Dr. Hughes is driven by monetary return.
19 I think he's a excellent physician, but I think
20 Dr. Hughes has a tendency to drift into areas
21 that may not be his expertise. But that's my
22 personal opinion.

23 **HEARING OFFICER:** And how did Dr. Hughes -- if you
24 know the answer to this, please respond. If
25 you don't, I understand that. How did



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1 Dr. Hughes impact the school board? I
2 understand he was a school board member.

3 A: Yes.

4 **HEARING OFFICER:** But how did -- what did he do that
5 impacted the school board?

6 A: I honestly do not know that answer.

7 **HEARING OFFICER:** Do you have any direct knowledge
8 of anything that he may have done that impacted
9 Dr. Slayman?

10 A: Not directly.

11 **HEARING OFFICER:** Okay. So would it be fair to that
12 say that anything you do know is merely
13 hearsay?

14 A: I would say that's probably accurate.

15 **HEARING OFFICER:** Okay. All right.

16 **MS. POLVI:** Just a clarification with regard to
17 about Dr. Hughes and the school board, not
18 generally, right? Just for clarification of
19 your question?

20 **HEARING OFFICER:** Yes.

21 **MS. POLVI:** All right.

22 **HEARING OFFICER:** Yes.

23 **MS. POLVI:** All right. Okay.

24 **THE WITNESS:** And then just another brief follow-up.

25 **MR. BUNDY - REDIRECT EXAMINATION BY MS. POLVI:**



1 Q: With regard to the grievance that was filed
2 with -- against Dr. Slayman, it was initiated
3 there's been testimony that it initiated from
4 a school board member, the process starting.
5 Do you know who that school board member was?

6 A: I assume it was Dr. Hughes, but I do not know.

7 Q: Thank you.

8 **MR. BUNDY - RECROSS-EXAMINATION BY MR. WINBURN:**

9 Q: I can't help myself. Did you have a good
10 relationship with the transaction where you
11 bought Dr. Hughes' house?

12 A: Oh, yeah.

13 Q: Okay.

14 A: That was fine.

15 Q: All right. Do you know if Dr. Hughes is named
16 as a witness in this case?

17 A: I believe he is.

18 Q: Okay.

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

20 **HEARING OFFICER:** Anything further?

21 **MS. POLVI:** No. Thank you.

22 **HEARING OFFICER:** All right. Thank you so much,
23 Mr. Bundy.

24 (Witness excused.)

25 (Off the record.)



1 **ROBERT ALLEN TEAL**, having been duly sworn, testifies
2 as follows:

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

4 **MR. TEAL - DIRECT EXAMINATION BY MS. POLVI:**

5 Q: Good morning, Mr. Teal. I am an attorney with
6 Cromer, Babb, Porter & Hicks, and I'm
7 representing Dr. Slayman with regard to this
8 disciplinary hearing before the Department of
9 Education. And I'll be asking you some
10 questions about things that you know related to
11 the time frame when she was superintendent.
12 But first, let's get a little more background
13 about you. What are your professional
14 credentials?

15 A: Received a bachelors degree from Francis Marion
16 University, a masters degree from the
17 University of South Carolina, educational
18 specialist degree from Winthrop University, and
19 appointed as a summary court judge some years
20 ago by our local delegation and went through
21 the training with SLED and sat on that bench.

22 Q: And in terms of your tenure with the education
23 field, how long were you in the education
24 field?

25 A: 39 years.



1 Q: How long have you known Dr. Slayman?

2 A: Since 1996.

3 Q: And how -- in what capacities have you known
4 Dr. Slayman in the education field?

5 A: After 23 years in the Chesterfield County
6 Schools District and various positions, I moved
7 to Kershaw County as director of the Career and
8 Technology Center. And when I went there in
9 1996, Dr. Slayman was an assistant principle
10 with Lugoff-Elgin High School. And during our
11 working together within that district, I stayed
12 in that position for 12 years as Dr. Slayman
13 moved to -- from an assistant principal to
14 principal of North Central High School and from
15 North Central High School to the district
16 office as director of instruction.

17 Q: And shortly I'm gonna ask you about time frames
18 when she was superintendent. But during the
19 time frames of those previous times that you
20 have worked with one another, how would you
21 describe Dr. Slayman and how she performs
22 herself in the work place?

23 A: Well, let me go back and say, the last four
24 years I was in the district. And during my
25 time as director of Career and Technology, we



1 worked together -- she was a district -- as a
2 district employee. I was in her department of
3 instruction. And the last four years I was
4 employed from 2008 to '12, I served as director
5 of pupil services, which included the duties as
6 a hearing officer, which was also under
7 Dr. Slayman's supervision or under her
8 department. Now, ask me that question again,
9 because I forgot to say that.

10 Q: That's actually your testimony is a good segue
11 to: Time that you've worked with Dr. Slayman,
12 how did she kind of comport herself in terms of
13 her interactions that you observed?

14 A: Very professional. Again, she handled the
15 department -- and I had an opportunity again to
16 work with her -- the school, nevertheless. My
17 position was very similar to a principal's
18 position, so I had an opportunity to work with
19 her in that as well as the district office.
20 But, you know, professional, I mean, when a
21 meeting was called or a meeting was held and if
22 she was in charge of that meetings, you knew
23 exactly what was going to be covered. It was
24 covered and covered thoroughly. Demeanor-wise,
25 couldn't have been any more professional.



1 Q: And at any point during time frames that you've
2 worked with Dr. Slayman, have you ever observed
3 her give anybody, what you perceive as to be a
4 hostile work environment, treat someone to a
5 hostile work environment that she supervised?

6 A: No. And that includes a long, long period of
7 time in the various circumstances in dealing
8 with staff at the high school level because we,
9 in a manner, shared the staff. My staff and
10 her staff shared students. And so I had the
11 opportunity to work with her in -- with
12 employees, you know, and with co-employees and
13 people that -- of the same level in terms of
14 the organization of the school district and not
15 the first time, never.

16 Q: And with regard to the Chester County School
17 District, in what capacity did you work with
18 the Chester County School District when
19 Dr. Slayman was the superintendent?

20 A: I believe Dr. Slayman left in December of two
21 thousand and was it '11 or '12?

22 DR. SLAYMAN: '12.

23 A: '12 to become superintendent of Chester County.
24 And I continued working at the District in my
25 capacity. But after 39 years and doing the



1 business of the school work and doing the
2 judicial work that I had assumed and was given
3 or did, you know, I had an opportunity again to
4 sometimes -- I guess it was in the fall of
5 2012, I went to Chester. Dr. Slayman called
6 me, she has a career center there. And I knew
7 the director, Dr. Lee Green, and I had worked
8 together. And we had done a comprehensive
9 needs assessment in the past there at -- in
10 Kershaw County. And she wanted a similar
11 product and some areas reviewed, so I worked
12 with Dr. Green for the better part of a year.
13 I think it went from like maybe September over
14 into March or April. Once, twice a month I
15 would spend a day with his career center, his
16 staff and during that time, had an opportunity
17 to work with the high school principals that --
18 who sent students to the career center for a
19 portion of their day. And so we completed that
20 project and, you know, I think it turned out to
21 be a good product and to help the school make
22 some decisions that they needed to make in
23 serving students.
24 And we finished that up in '13, I believe it
25 was. And then in 2015, Dr. Slayman called me.



1 They were considering the implementation of a
2 youth apprenticeship program, which would
3 involve pulling the high school principals
4 together and the career center director and
5 working with her district staff and the school
6 staff to implement that program. And it was --
7 it had just -- again, the apprenticeship is
8 certainly not anything new, but the school
9 districts were just getting into that because
10 of some changes in the law and different things
11 and allowing students to go on a work site.
12 But to shorten that and to bring it to closure,
13 I spent from -- I think we started maybe in
14 February and finished in April of 2015, and we
15 were able to join partnership with York County
16 Technical or a college along with Chester
17 County School District and implement that youth
18 apprenticeship program for them and that
19 comprehensive type program was one of the first
20 three or four in the state. And, again, I
21 think it was a good product and a good process
22 for students to go to the work force with the
23 credential and continue with college while in
24 high school.

25 Q: And during the time frame that you were with



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1 the Chester County School District the -- about
2 a year in 2012 and then the -- about three
3 months in 2015, how would you describe your
4 observations of Dr. Slayman interacting with
5 senior cabinet staff?

6 A: Again, a number of staff, I remember, would
7 know more if I saw them. But I worked with
8 several that I could -- I think I could recall
9 their names. Again, it was the type business
10 and the type relationship I would expect and
11 consider appropriate for a school district.
12 Dr. Slayman, while she -- time did not permit
13 her to sit with us in every meeting, I would
14 say 95 percent of the time, she would come
15 speak and take any questions that the staff
16 had. But the majority of it was I would be
17 working with her staff and the high school
18 principals since this was -- and the career
19 center director since it was for students at
20 that level. But it was, again -- it was
21 professional, and it was what I would expect to
22 do. And quite frankly, I don't think a lot of
23 superintendents would have given the amount of
24 time and the interest that she gave, which was
25 a very positive signal, I think, to her staff.



1 And they responded very well. A very
2 professional job.

3 Q: During the time frames that you were working
4 with the Chester County School District when
5 Dr. Slayman was superintendent, did anyone ever
6 bring any concerns to you about Dr. Slayman?

7 A: In terms of a negative concern, in terms of a
8 problem?

9 Q: Right.

10 A: Not one.

11 Q: During your time frame with the District, did
12 you have a professional relationship or that
13 you worked with Charles King?

14 A: I did. I knew Charles King before he went to
15 Chester. He and I worked together during part
16 of his education career where he was a
17 assistant principal, elementary and middle
18 school principal in Kershaw County. And I knew
19 Charles King, Dr. King, before and during that
20 time. During most of the meetings that we had
21 for the youth apprenticeship program, Dr. King
22 would be there. There was a couple that he
23 didn't -- it was kind of a type work and things
24 we were doing that didn't -- he was kind of --
25 the type work and the things we were doing



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1 didn't require him to be there, but he
2 generally was at the meetings as well as during
3 the other project. Lee Green was at those but,
4 no.

5 One employee did talk at one point in time
6 about having a lot to do. It was not -- it was
7 in -- it was, I think the title would be Public
8 Information Officer. You know, she would --
9 and it was -- I think the reason for that was
10 I did not have a staff. As a matter of fact,
11 I kind of leaned on each of the resources and
12 the resources from there. So she would remind
13 me that she had other duties and a lot of
14 things to do. Not in a negative way but in
15 terms of, you know, I guess, you know,
16 reminding me, you know, she had a job and I was
17 brining in another one, I guess.

18 But it was a positive experience I -- you know.
19 And it was short because of the timing. I was
20 respectful of the high school principals. They
21 were getting ready for graduation, springing
22 forward. So, I mean, their wagon was full.
23 And I told them that, you know, that we would
24 do, with their approval, as much of the work
25 and make it as, you know, less burdensome for



1 them as possible. And I, having been a
2 principal, as many of us, I knew what they were
3 under in April and March getting ready for
4 their closing and registration and all of that.
5 So we were -- we had to push it, but we did it
6 without trying to burden them.

7 Q: And knowing that you were there with the
8 District during the latter part of the last
9 year that Dr. Slayman was superintendent, the
10 last school year, were there any inklings in
11 your mind of any hostile work environment in
12 the district office?

13 A: Never witnessed any. And I -- I had -- I went
14 into her administrative assistants' area. I
15 went into the instructional staff. Because the
16 instructional assistants were the ones that
17 primarily helped me with developing the
18 documents and collecting the data and, you
19 know, we developed partnerships with York
20 Technical College. And we also had to deal
21 with a lot of the business industry community
22 because they were our partners and for the
23 students. So I want to say that I had an
24 opportunity to work or be around that
25 environment a considerable amount of time



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1 during that period of time. And working with
2 them, I just never heard of any kind of an
3 issue or any kind of complaint or see anyone
4 that looked like they were -- they had enough.
5 And it just -- very professional people, you
6 know. Very professional.

7 Q: And I think -- I you believe your testimony,
8 you had known Dr. Slayman professionally since
9 1996. How long had you known Charles King
10 professionally?

11 A: Charles was in the District whenever I started
12 there. I cannot be, you know -- I believe
13 Charles may have been an assistant principal at
14 North Central High School during that time.
15 I -- it seems that's where I first met him.
16 And shortly after, he went to be a principal of
17 an elementary school and the principal of a
18 middle school. So knew him almost the entire
19 time I was -- you know, that he was there. He
20 left before 2012 from the District.

21 Q: And knowing that y'all had had a long
22 professional relationship, do you think if he
23 had been suffering from a hostile work
24 environment from his supervisor, i.e., during
25 the 2015 time frame when you were working



1 together, he would have told you about it?

2 **MR. WINBURN:** Objection. Calls for speculation.

3 **HEARING OFFICER:** Sustained.

4 Q: Did Charles King ever say to you that
5 Dr. Slayman subjected him to a hostile work
6 environment?

7 A: No.

8 Q: Based on your observations of working with
9 Charles King and Dr. Slayman, do you believe
10 Dr. Slayman subjected Charles King to a hostile
11 work environment?

12 **MR. WINBURN:** Same objection.

13 **MS. POLVI:** Based on personal observations.

14 **HEARING OFFICER:** I'll let you ask that.

15 A: I had an opportunity again to work, I guess,
16 primarily with Charles because whenever I
17 wanted agendas to go out and information to go
18 to the principals, I felt like it was -- would
19 provide a better impact coming through Charles.
20 So most of my communication through e-mails and
21 phone calls was with Charles. So if there were
22 such an occurrence, you know, he had the
23 opportunity to share that. And I think our
24 working relationship probably would have given
25 him the -- or he would have -- he could have



1 mentioned something. But to answer your
2 question, never did I -- do I recall him
3 mentioning anything about a term "hostile work
4 environment" or, you know, things not going
5 well with his position there in Chester.

6 Q: And with regard to your observations, was
7 that -- what were your observations with regard
8 to Dr. Slayman and Charles King's interactions
9 when you were present?

10 A: Again, the three of us had a history of working
11 together. And when I went there, I saw two
12 people that I thought were very pleased with
13 the positions they had, with the jobs they were
14 doing, and the way things were going. We did
15 have time -- or an opportunity to have lunch on
16 a couple of occasions, and it was business as
17 usual. Again, I -- just no indication of such.

18 Q: During the time frames that you were at Chester
19 County School District, did you ever observe
20 anything that you would describe as a morale
21 issue?

22 A: No.

23 Q: When you were with the Chester County School
24 District, did you observe whether Dr. Slayman's
25 door was typically open, closed?



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1 A: When I went up there, I tried to touch base
2 with Dr. Slayman. And I would go through,
3 again, the main office and go to her
4 administrative assistant, and I don't remember
5 the door being closed. Now, if we were
6 talking, she may get up while I was sitting
7 there and close the door. But when I left, as
8 well as when we worked together, the door was
9 open.

10 Q: What type of interactions did you observe with
11 regard to how Dr. Slayman interacted with
12 Charles King, Jeff Gardner, Shawn Williams,
13 Brooke Clinton, and Anna Stroud?

14 A: Okay. I think I only know three of those,
15 Charles, King, Jeff Gardner, and Brooke -- did
16 you say Clinton?

17 Q: Clinton.

18 A: She's the public information or whatever -- the
19 media? I don't know what her title was. She
20 did the press and all of that. That would be
21 the only three I think I recall meeting or
22 being around when Dr. Slayman was there. And,
23 again, it was very congenial. I mean,
24 professional, of course. But, you know, no
25 indication of any kind of controversy or any



1 kind of problems with them.

2 I remember Jeff because he was principal at
3 Chester High School, I believe, when I was
4 working on the project at the career center.
5 And I think maybe during the time from there to
6 '15, he may have moved to the operations or
7 the -- of the Department of Operations, if it's
8 called that. Our terms are different from
9 place to place. But I think it was Department
10 of Operations. And he only came in a couple of
11 meetings there when we were setting up things.
12 Really that time did not necessitate him being
13 there. But again, I did have an opportunity to
14 meet with those. Now, Brooke, I had a lot of
15 communication by e-mail and there because a
16 tremendous amount of what we were doing would
17 go out to the business and industry and the
18 public and setting up those meetings with the
19 various publics that we served. And, again,
20 the only thing -- and I don't know if you would
21 call it a negative -- she would remind me that,
22 you know, she had a lot to do. Never in a
23 negative way. It was just, I guess, to keep me
24 from adding more to her plate.

25 Q: During the times that you've worked with



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1 Dr. Slayman since 1996, have you ever seen
2 Dr. Slayman yell at people?

3 A: No.

4 Q: And have you ever seen Dr. Slayman threaten
5 anyone?

6 A: Absolutely not.

7 Q: During the time frames that you worked with Dr.
8 Slayman since 1996, have you ever seen anything
9 that you would describe as hostility sourcing
10 from her to people she worked with?

11 A: No.

12 Q: During the time frame that Dr. Slayman was
13 superintendent, did you observe Dr. Slayman ask
14 others for advice and their opinions?

15 A: Well, when we were developing and kicking this
16 program off, so to speak, she asked for input.
17 In particular, the three high school principals
18 because they were the key on whether this would
19 succeed or not succeed if this were supportive
20 of it. And so we always included them along
21 with the opportunity. If they were busy, they
22 could send a representative. But we wanted
23 every school represented.

24 And that would -- I was -- you know,
25 Dr. Slayman would come in just as -- before we



1 would start each of your planning and work
2 sessions and ask if they had questions or seek
3 their input. That was kind of the way she did
4 things even back when we worked together and
5 during instructional meetings and during
6 planning sessions during the previous district
7 when we worked together.

8 Q: With regard to the time frame that you've known
9 Dr. Slayman professionally since 1996, have you
10 ever observed her ever intentionally mislead
11 anyone?

12 A: No.

13 Q: Did Charles King or Jeff Gardner or Brooke
14 Clinton, the three senior staff that you've
15 testified you had interactions with, did any of
16 them ever complain to you about not being able
17 to get time off?

18 A: No.

19 Q: And did -- was there any time that you weren't
20 able to take time off if you needed it?

21 A: During our working together in Kershaw County?

22 Q: Or any time.

23 A: Oh, yeah. I was -- flexibility and, you know,
24 working around never was an issue. I mean, you
25 know, we'd schedule meetings there. And, you



1 know, again, if, you know, if Dr. Slayman was
2 not available, we -- the staff took care of
3 what we needed to take care of. And we would
4 generally set that up, you know, beforehand to
5 work with as many calenders as possible. But,
6 no, that was never an issue. I never heard
7 anyone say that was an issue.

8 Q: There's been reference to, I guess, a manner in
9 which Dr. Slayman called people, you know,
10 saying, hey, Charles. And it meaning, I think
11 I -- an intent to have Charles come to
12 Dr. Slayman's office. Did you ever observe
13 anything like that?

14 A: Well, no. And his office was located in an
15 area where if she did, I guess another one of
16 maybe his staff might could hear that. I don't
17 know if his office was -- would even make that
18 practical. But, no, not while I was there.

19 Q: Did you observe Dr. Slayman ever pull anyone
20 out of meetings or tasks to meet with her right
21 away?

22 A: Not during my time of working with those two
23 projects; no.

24 Q: What is the -- with your, I think you said, 39
25 years of education?



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1 A: Uh-huh.

2 Q: What is to protocol for relationships between
3 staff of a district and a school board? And
4 I'm taking out the is superintendent between.
5 Is it normal for staff to interact with school
6 board members a lot, a little bit, somewhere in
7 between?

8 A: No. I don't believe in that. And you -- in
9 regards to school business or school
10 information, no. And I've been on the
11 receiving end of that. And, you know, my
12 personal philosophy is, you know, you could
13 tell a board member where to find the
14 information or what to do to get that
15 information. But, no, it's -- you know, that's
16 not appropriate, was not appropriate for, you
17 know, to share or to ask opinions directly with
18 the board member. Don't believe in that.
19 Didn't practice it. Didn't approve of anyone
20 that did.

21 Q: And would it be fair to say that the
22 appropriate process for staff interactions with
23 the board is to go through a superintendent?

24 A: Absolutely. I think, again, an organizational
25 chart in a process is very critical, you know,



1 for someone to bypass or to think that's not
2 protocol, asking for problems. Maybe where it
3 could be okay once -- one of two things. But
4 in the end that's a very deep pit.

5 Q: And during the time frame that you've worked
6 with Dr. Slayman, intermittently since 1996,
7 have you ever observed Dr. Slayman ever
8 discuss, you know, personnel or contractual
9 matters to people who she shouldn't have?

10 A: No.

11 Q: And the Bagley report was essentially
12 publicized. Did you read it?

13 A: I saw it briefly. I didn't -- since it was
14 public information, just blown away with it.

15 Q: Based on your -- solely on your personal
16 observations working with these individuals,
17 ones that you've already identified in your
18 testimony, what is your opinion about what you
19 observed with regard to what was accused in the
20 Bagley report?

21 **MR. WINBURN:** Objection. His opinion?

22 **MS. POLVI:** I mean, a witness able to ---

23 **HEARING OFFICER:** Sustained. Sustained. Refresh
24 your question.

25 Q: With regard to the Bagley report that you've



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1 read. Of your personal knowledge, are there
2 anything that you were concerned about?

3 A: I didn't study it in detail, and it's been a
4 while since, you know, that was public. And
5 Dr. Slayman and I, while we may, again, have
6 talked since 2015, we didn't have discussions
7 about that. And, of course, that's not
8 answering your question. I don't remember
9 anything in the writing of that report that I
10 could find any evidence or had ever seen any
11 evidence of. I was kind of surprised that if
12 I -- again, I wish I had read it recently.
13 But, no, there was nothing there that provided
14 any substance, to my knowledge.

15 Q: And as a principal and district-level
16 administrator during your years of being in
17 education field, would you be able to enter,
18 you know, a school district and be able to
19 ascertain whether there were hostile work
20 environment issues pervasively occurring?

21 MR. WINBURN: Objection. Ask for a professional
22 opinion. He's not been established as an
23 expert.

24 MS. POLVI: I'm not putting him in as an expert.
25 This is just, again, is -- you know, he's ---



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1 **HEARING OFFICER:** You can ask him about his
2 observations.

3 Q: If there had been a hostile work environment at
4 Chester County School District, would you have
5 been able to observe it?

6 **MR. WINBURN:** Same objection, but he can answer it.

7 **HEARING OFFICER:** Rephrase that question.

8 Q: With regard to the Chester County School
9 District, your time there, based on your
10 background in the education field, did you
11 observe low morale?

12 A: No, I didn't. As a matter of fact, I was
13 impressed with the staff that I worked with and
14 their eagerness to get this job done, to
15 provide information, to develop the products
16 that they developed. And it was for the amount
17 of time that we were privileged to and put into
18 it, I think it turned out real well. And
19 during that time, again, after serving, again,
20 in the positions and doing the responsibilities
21 that I've done over 39 years, the school
22 climate, work climate, culture, you know,
23 that's something that one can sense.

24 Q: And what was your sense?

25 A: My sense was that, you know, I was impressed



1 with it. I was impressed with the facility,
2 with the employees, with getting things done.

3 Q: Do you believe that Dr. Slayman, when she was
4 superintendent, cared about the staff and
5 students of the Chester County School District?

6 A: I believe that's why she called me or someone
7 like me to do what I did to provide additional
8 opportunities, which absolutely supports your
9 question that she cared. And given the time,
10 I could tell you how I've seen students react
11 for years who came into contact with
12 Dr. Slayman during different activities. It's
13 pretty much was kind of like the pied piper.
14 They went to her. And, you know, if someone
15 didn't like a principal or supervisor, they
16 could turn the other way. But, no. Didn't
17 happen.

18 Q: Those are all my questions. I have may have
19 follow-up, but ---

20 A: Sure.

21 Q: --- Mr. Winburn and Ms. Pike have an
22 opportunity to ask questions as well.

23 **MR. TEAL - CROSS-EXAMINATION BY MR. WINBURN:**

24 **MR. WINBURN:** Mr. Teal, my name's Scott Winburn.
25 I'm a lawyer for the Department, I want to ask



1 you a couple questions just as follow-up. Did
2 you say you worked in Chesterfield for a while?

3 A: I did, 23 years.

4 Q: What was your position in Chesterfield?

5 A: I was a teacher, coach, assistant principal,
6 district employee, and elementary principal,
7 and a high school principal.

8 Q: When were you an elementary principal?

9 A: In 1986, '88.

10 Q: Okay. No. I'm sorry. I'm not quizzing you.
11 My mother was a elementary school teacher in
12 Cheraw and ---

13 A: Uh-huh.

14 Q: --- I don't want to stretch my credibility. I
15 told the previous witness I grew up in
16 Bennettsville, which I did, but my people from
17 Patrick. So you know where that is.

18 A: No. I know your people.

19 Q: Yeah.

20 A: You look like your people. You know Bean
21 Winburn?

22 Q: I do.

23 A: Not that I didn't -- I didn't until you told
24 me. But I can see.

25 Q: 'Cause that's where I grew up.



1 A: Well, I thought so. I didn't know -- my dad
2 was nicknamed Bean as well, so I don't know if
3 you knew him.

4 A: I didn't ---

5 Q: Yeah. This not the first time I have sort of
6 deposed somebody -- I had a case once where the
7 injured worker, who was injured pretty bad, I
8 told him who it was and he kind of sat back in
9 his chair and he had the same reaction you did.
10 I didn't intend for you to have that but
11 anyway ---

12 A: That's okay. You need to be a judge in the
13 community where you grew up.

14 Q: Yeah. I -- anyway, I am -- I definitely -- I
15 still got a little more hair than my -- both my
16 grandfather and my father. It's fading quick.

17 A: Family trait.

18 Q: Anyway so I wanted to get a time line real
19 quick on just how long you were there
20 between -- as I understood your testimony, it
21 was from February to April of 2015, the project
22 that you were on? Can you explain again just
23 for me the time frame?

24 A: Yeah. I think it started in February, and we
25 met a couple of types a month, but a lot was



1 done with just individual meetings. And the
2 reason it's -- it kind of wrapped up, the high
3 school principals, you could tell they were
4 looking at graduation. They were looking at,
5 you know, spring sports, all that coming
6 together. So they had that kind of a look
7 like, you know, I don't need anything else on
8 my plate.

9 Q: Right.

10 A: And so we tried to -- we tried as her staff,
11 Dr. Slayman's staff, and I and we tried to take
12 that burden as much as possible but yet end up
13 with a product that would give the students the
14 technical college and the work opportunity.

15 Q: Right.

16 A: And it did. It did.

17 Q: Now, they -- as I understand you, you did --
18 you mentioned earlier that when you came up
19 there to the office, I'm assuming when you came
20 to the district office to Dr. Slayman's office.
21 How often would that happen while you were
22 there. And how much time? Was that a daily
23 occurrence, a weekly occurrence? What would
24 you say?

25 A: When I was there?



1 Q: When you were there.

2 A: No. I'd say maybe 12 to 15 times during the
3 whole -- during the three months.

4 Q: Okay. And I also just wanted to you follow up
5 on some of the things you said. As I
6 understood your testimony, you mentioned that
7 the folks, the staff were very professional
8 people; is that ---

9 A: Absolutely.

10 Q: Okay. Now, and that you were impressed with
11 the staff?

12 A: I was.

13 Q: Is that fair to stay? I also understand you
14 worked with Charles King?

15 A: I did.

16 Q: And in your time with Dr. King, did you -- was
17 he, in your view, a capable, good worker?

18 A: With all the times I worked with him in the
19 positions, yes. I cannot answer his
20 capabilities as a -- what dealings I had ---

21 Q: Sure.

22 A: --- were very capable and responsive.

23 Q: Right. And that's really all I'm asking about,
24 just to see what your experience was with him.
25 And I'm curious what you think. This is gonna



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1 kind of ask your opinion. But in that context
2 with someone like Charles, would you anticipate
3 somebody confiding in -- you're a temporary
4 worker, correct? A contract worker?

5 A: Yes.

6 Q: Would it -- in your view, would it have been
7 professional for any of the staff to really
8 pull you aside and confide in you about
9 problems they had with their superintendent or
10 specific occasions where they're telling you
11 about an incident that they didn't agree with
12 about the supervisor?

13 A: Probably unlikely for someone. Again,
14 professional but, again, you know, lot of time
15 spent together, some -- you know, if there were
16 unpleasant issues, it would tend to come out,
17 I believe.

18 Q: Right.

19 A: I have no fact of that happening either one way
20 or the other. Again, I felt like I never saw
21 them under duress or under any kind of pressure
22 other than getting this one more project done
23 with all the other projects that comes with
24 running a school district in our school.

25 Q: Understood. And after you completed your



1 project in April of 2015, did you have any
2 other interactions with the -- with Chester
3 County School District?

4 A: No. Not -- there may -- I may have called to
5 see if you know, the apprenticeship got into
6 the registration with the technical college and
7 the District, just a little follow-up on it.
8 The person that we worked with with the State
9 Technical College -- I can't tell what -- this
10 is State Technical College group. He and I
11 continued to talk about apprenticeship and so
12 forth and, you know, it was rolling as it
13 should be. But I didn't go back. I didn't --
14 I did not -- once I finished the project ---

15 Q: Right. Just follow-up on a couple of questions
16 related to communications with the board, I
17 understand your testimony that based on the
18 organizational chart, it would be appropriate
19 to elevate concerns or -- I'm sorry --
20 elevate -- let me strike that.

21 Based on what you testified, I understood that
22 you thought it was best to follow the
23 organizational chart; is that ---

24 A: Protocol.

25 Q: And protocol in terms of communications with



1 the board?

2 A: Absolutely.

3 Q: All right. If -- in your view, would it be
4 unusual for a superintendent to specifically
5 and completely forbid their staff from
6 communicating with the board, or are you just
7 talking about technical issues that the
8 board -- questions that the board may have need
9 to flow through the superintendent? Which one
10 is it? Is it just a ---

11 A: Well, I don't think it's a hard set. I mean,
12 if you -- again, in areas like Chester or
13 Chesterfield County or Kershaw County, somewhat
14 rural but small towns, you're gonna cross
15 paths.

16 Q: Right.

17 A: And you know, a board member may ask a
18 question, but I will tell you and tell anyone
19 if you tell a board member something, it better
20 be something that was public, better be
21 something that he had -- or she had access to
22 in any kind of manner and it -- no opinion
23 about, for example, how a person may do their
24 job.

25 Q: Right. Board doesn't want to hear about



1 in-fighting among staff. Is that kind of what
2 you're saying?

3 A: Well, some would want to hear about everything
4 if you'll talk with them.

5 Q: Sure.

6 A: I've had them to call me and say, you know, any
7 time you got something you want to talk about,
8 call me.

9 Q: Sure. I sort of misspoke. I meant, you know,
10 as -- in terms of an organizational protocol,
11 it's your testimony it would be inappropriate
12 to relay concerns directly to the board for the
13 purposes of trying to create instability and
14 instigate things; is that fair to say?

15 A: Yes.

16 Q: But in terms of a hard stop, absolutely no
17 communication to the board, you're not exactly
18 saying that?

19 A: No. That's impossible in the environments that
20 we operate in.

21 Q: Sure.

22 A: And it very well may be. And I think I had as
23 good a relationship with a superintendent as
24 one would want in the educational field. And,
25 you know, a board member may ask a question.



1 And if it was something that I was responsible
2 for or irrelevant, I may answer it. And I very
3 well may, if I had an opportunity to talk with
4 the superintendent, let them know that. But if
5 they ask me -- for example, I run a career and
6 technology center, and if they ask me something
7 about a high school facility somewhere, you
8 know, I got real blank in the way I can respond
9 to that.

10 Q: Understood. I think that's all I have.

11 A: Okay. Thank you.

12 **HEARING OFFICER:** I don't have any questions,
13 Mr. Teal.

14 Anything follow-up?

15 **MR. TEAL - REDIRECT EXAMINATION BY MS. POLVI:**

16 Q: Just a brief one thing I hadn't asked yet and
17 wanted to see if you had personal knowledge
18 about. Did you and Dr. Slayman ever discuss
19 concealed weapons permits?

20 A: You know, I believe we probably -- I have one.
21 The only time I've ever taken it out of my
22 wallet was to pay SLED 50 more dollars to get
23 it renewed.

24 I think we kind of talked about it when we both
25 got our concealed weapons permit. You know,



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1 traveling, you know, to the coast to the beach
2 or, you know, places like that, you know, being
3 legal and being safe, sometimes that comes --
4 you know, that's -- in this day and time,
5 that's not a bad thing. I would want my wife
6 to have one and be legal with it. Now, to
7 answer, I guess specifically, I believe we not
8 ours about the same time. She may have gotten
9 hers a little before I did, but I'm guessing it
10 was probably ten years ago or so.

11 Q: And you discussing it in any way with
12 Dr. Slayman, is that in any way a type of
13 threat that she would use it, by her talking
14 about a concealed weapons permit?

15 A: No. It was just a process. What do you do to
16 get one, you know, what do you do with it and
17 what's the value of it as far as it making
18 anyone for dangerous as a bigger threat or
19 saying, hey, I got this permit. That's just a
20 legal document to be legal.

21 Q: Thank you.

22 **HEARING OFFICER:** Anything further?

23 **MR. WINBURN:** Nothing further.

24 **HEARING OFFICER:** All right. Thank you, Mr. Teal.

25 I appreciate your you coming.



(Off the record.)

HEARING OFFICER: All right. We're back on the record, and we have Mr. Robert Allen Teal, who has come back and said that he'd like to make an additional statement.

THE WITNESS: Okay. The -- some of the things that we talked about today, I hope I've answered them well enough. But I wanted to go back to a couple of things. When Dr. Slayman, before she left the Kershaw County, we had worked very closely as principal career center director and then, you know, with her staff as the director of pupil services. But the last task she and I worked on together was a comprehensive Title 9 audit complaint for the school district. And what that required us to do is to spend every minute of every day, when I didn't conduct hearings or deal with athletic issues or student issues, to work on that project. It would be unbelievable how many hours. And I just wanted to let this group know I just believe that if there had been any harmful, negative, hostile bone in this person's body, that I would have had the opportunity to be a recipient or to hear or see it. And it never,



1 ever happened. And I don't know who's -- I
2 heard a list read.

3 I'll tell you something else that's
4 interesting. Again, we talked a lot in '15,
5 but we may be -- talked a couple of times a
6 year after that, every three or four months,
7 because she has a place at the beach, and I
8 have a place at the beach. And not only were
9 we professional colleagues, but we had an
10 opportunity to have dinner with her husband and
11 my wife. Again, I want to -- I'm amazed when
12 I read that report sometime ago and at this
13 meeting today that these accusations, the basis
14 of them is unbelievable to me because I know
15 this person. And I'm here today again to speak
16 on her behalf put also to answer any of the
17 fact-based questions that I possibly can. I
18 wanted you to know that, again, that I don't
19 know who said what or what occurred, but it
20 never occurred in the 22 years of my
21 association with this individual. And I just,
22 again, don't believe that, you know, a person's
23 going to change their habits or their nature
24 overnight. But just as this has been
25 professional, I found every place I've worked



1 with her just as professional and just as, you
2 know, on top and as it should be from what I
3 would want and expect to be a part of.

4 But anyway, I wanted to come back and make
5 sure, again, that it established that -- I
6 don't know how many witnesses you talked with.
7 I don't know. We don't talk about that. I
8 believe -- and I asked her when she first
9 called me, I said, well, you don't have to tell
10 me anything 'cause I want to tell them and talk
11 to them with very, very clear, you know, mind.
12 And I don't need to know all of who did what.
13 I only know the other because, again, I
14 wondered what happened. And I don't know all
15 that happened, and we don't discuss these
16 things. We never have and personal atmosphere.
17 Didn't need to professional because, you know,
18 just didn't call us -- didn't provide the
19 opportunity or make it necessary. But anyway,
20 that's all I have to say.

21 **HEARING OFFICER:** Thank you.

22 **(Witness excused.)**

23 **(Off the record.)**

24 **CHARLES MOORE,** having been duly sworn, testifies as
25 follows:



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MR. MOORE - DIRECT EXAMINATION BY MS. POLVI:

Q: Good afternoon, Mr. Moore. My name's Shannon Polvi. I'm an attorney with Cromer, Babb, Porter & Hicks, and I'm representing Dr. Slayman with regard to this disciplinary hearing before the Department of Education. So I'll be asking you some questions that are directly relevant to her tenure as superintendent, your personal knowledge of that. But before we get into those details, I'm gonna ask you a little bit about your background. What are your professional credentials?

A: I am a certified as a superintendent, high school principal, vocational director, biology teacher, agriculture teacher. And my experience has been as a teacher at Norman High School. Was Teacher of the Year in Spartanburg School District 6, was one of the state finalists for Teacher of the Year in 1982, I think. I'm -- my -- I'm getting old. My memory's fuzzy. From that position, I was a state vocational teacher, Vocational Ag Teacher of the Year and ran a nation -- nationally recognized program in agriculture, even got to



1 go to a reception at the White House with --
2 when President Reagan was there.

3 So, you know, and then moved into
4 administration, was an assistant principal at
5 Dorman for two and a half years and then moved
6 to vice principal for two and a half years.
7 And then became principal of Boiling Springs
8 High School and stayed there three years, went
9 back over the Dorman as principal, then went
10 back to Spartanburg District 2 as director of
11 secondary. And I had Boiling Springs, Chesnee,
12 and the three middle schools under my charge
13 and director of technology.

14 Then went back to being a principal again. I
15 didn't much care for district office living and
16 asked to go back to where I could actually make
17 a difference for some people and spent my last
18 ten years as the principal of Boiling Springs
19 High School. I have bachelors, a masters. Got
20 my doctorate at Clemson. Almost finished, but
21 I became a high school principal faster than I
22 thought I was going to and did not get that
23 little paper done and had everything else --
24 passed the comps and everything else. I was
25 ready to go but did not get that finished



1 because I was trying to be an officer in the
2 Air Force Reserve and trying to be a principal
3 and trying to, you know, finish that degree all
4 at the same time. And it just -- it got to
5 where I couldn't do it.

6 Q: Thank you for that background. How do you know
7 Dr. Slayman?

8 A: We got to know Dr. Slayman -- let me cut this
9 thing off and make sure it's not there. I was
10 doing a presentation one time and told
11 everybody else to cut their phones off. And
12 right in the middle of the presentation, phone
13 rings.

14 I got to know Dr. Slayman -- we were asked in
15 2012 or '13 to do a salary study for the Olde
16 English Consortium. And we did the salary
17 study, and then Dr. Slayman asked us to do some
18 additional things for her. And that's how we
19 got to know her.

20 And we did a lot of work for her, you know, in
21 a lot of different areas.

22 Q: And with that description, is it accurate to
23 say that you were a consultant with the Chester
24 County School District?

25 A: Yes. Yes, we were.



1 Q: And how familiar were you with the principal's
2 senior staff during your time as a consultant?

3 A: Very familiar. They were good people. I mean,
4 you know, they were -- you know, they all
5 seemed to be working together. Very, very nice
6 thing. I will tell you, I spent a lot of my
7 time working with a lady named Kelly
8 Lunsford-Thomas, who I think had gotten into
9 some problems. But Kelly was an expert in
10 data, and we worked together with that -- with
11 data in the schools while we were working on a
12 salary study.

13 And if I may, let me show you some things.
14 This is the first thing that Dr. Slayman asked
15 us to do. This is a supplemental
16 recommendation. And, you know, it was beyond
17 anything that Consortium asked us to do. She
18 wanted to look at the supplements for our
19 coaches. And what we did was we took 30
20 districts and we compared supplements. And I
21 found out there were 900 ways to say coach in
22 South Carolina and all these different
23 assistant coaches and all that -- to give her
24 a good idea of what was paid. They weren't
25 even paying their band directors. And they had



1 one state championship band in Louisville down
2 there a few years ago and wasn't even paying
3 him. And so first thing we did was that.
4 Then she asked us to start working on a salary
5 study. And this is an interesting thing.
6 That's the Chester County salary schedule.
7 Now, if you look at this thing, that
8 Dr. Slayman wanted to fix it. It only has
9 three steps: minimum, median, maximum. That's
10 all. Three steps. How in the heck could you
11 get a good principal or an administrator to
12 come into that kind of stuff? And here's the
13 reason. I ask principals and administrators,
14 where are you on these steps? Well, we don't
15 know. I said, when do you know you're going to
16 get a pay raise? We don't know that.
17 There was no consistency on it across the
18 board. It's just when somebody else decided
19 they needed a pay raise. That's the way the
20 thing was set up. And this thing also had
21 seven steps for food service for our food
22 service director. Who the in the heck uses
23 seven steps for a lunchroom manager? And, you
24 know, that's the kind of stuff we took a look
25 at.



1 And I will tell you up front, this particular
2 schedule here, recommendation went to
3 Dr. Slayman in January 2015. And if you look
4 at that thing, it is a salary scale for every
5 position in that district. Only I got really
6 aggravated when I turned it in to Dr. Slayman
7 because we couldn't make the numbers add up.
8 Turns out I was given the wrong one of these on
9 which to base this study. I spent weeks
10 working on this study with the wrong data.

11 Q: And let me just interject quickly. Who
12 provided you the wrong data?

13 A: The District. That's as far as I can swear and
14 say. But I spent weeks doing it. And one
15 of -- the director of finance or whatever her
16 name was -- what's her name?

17 Q: Ms. Stroud? Anna Stroud?

18 A: Anna. Anna was trying to tell us we don't --
19 we need a salary study. And I said, Anna,
20 that's what we're doing. Well, we need to
21 compare the, you know, the job skills and the,
22 you know, and the things that people do on the
23 job. And I said that's not a salary study.
24 That's, you know, a completely different thing.
25 That's, you know, to a scaled study or you know



1 that kind of thing. You know, Anna just had
2 the wrong idea about what this thing was.
3 So we redid that. We took out. We found out.
4 And Dr. -- and I'll just -- let me just read
5 you this thing here. This is the presentation
6 when we went to the board. All right. The
7 objectives were to develop salary scales that
8 had clear steps -- they only had three steps in
9 that mess -- to install a 24- or 28-step scale
10 for every position, to modernize, realign, and
11 revise positions in the old band system -- and
12 that's the administrative band thing -- to
13 establish career pathways so that a person
14 could advance.
15 You see, we in education are really good about
16 advancing ourselves, but the people that work
17 for us in maintenance, the secretaries and all,
18 we don't have a way for them to advance. We
19 stick them in the same position. In one
20 district, this poor person had been in the same
21 position that we did and had been in the same
22 job for about 20-something years and they
23 hadn't advanced. And, you know, to change the
24 structure adversely affecting any structure.
25 Just a minute, I'll talk about that too.



1 We started in 2013 we compared Chester,
2 Lancaster, Rock Hill, Fort Mill, and York. We
3 compared supplements. She -- the District
4 developed supplemental schedules and were
5 approved salary schedules were produced. But
6 they were not adequate to meet the District's
7 needs. What we did was we looked at this thing
8 and -- we really saw that Fort Mill was skewing
9 it to the high end. The highest paid school
10 district in the state of South Carolina is Fort
11 Mill up to 17 years. After 17 years, it's
12 Clover. Those are highest paid school
13 districts. So and we just did a study on that
14 a few month -- a year or so ago.

15 But so we took out that. Then we realigned
16 this thing. There are months more. There are
17 four scales there for every position in that
18 district, that in this particular thing is
19 administrative support at Louisville Middle.
20 We took it out with Chester. We looked at Fort
21 Mill. We looked at all the districts with Fort
22 Mill. We looked at all the districts without
23 Fort Mill in this particular thing. We also
24 dropped Lancaster out the bottom as well
25 because Lancaster was skewing it the other way.



1 But and we went through several derivations of
2 that.

3 We were trying to find a way that the district
4 could afford this and that Dr. Slayman could
5 give her people a raise. We went to
6 10 percent. We recalculated all that stuff on
7 10 percent. And finally we came down to it, we
8 said let's just see if we can do better than
9 Rock Hill, because Rock Hill is stealing her
10 people. So that's the way we set it up.

11 All right. Now, we had a committee, and we
12 went through this particular thing. Now,
13 here's another derivation of the thing as well,
14 with scales. This particular document here
15 shows what we did (indicating). We met in a
16 room for, what, five or six days. I think Anna
17 and the personnel director, whatever her name
18 was were in and out, Charles King, Jeff, and
19 Dr. Littlefield, and I as well. And
20 Dr. Littlefield's in there some; sometimes he
21 wasn't. We went over every position in that
22 district. And what we did was we looked at
23 what effect this thing would have on the people
24 working in that district, every position.
25 Because on something like this, you do no harm.



1 So that's the way we set it up.

2 Anna was in there looking up the schedules, oh,
3 so-and-so here would be hurt with this. Well,
4 let's change that this way so that no one would
5 be hurt in that district. Because, you know,
6 you don't want to do one of these things and go
7 in and hurt people. That's not the idea. And
8 so that's what we did. This was a thorough,
9 exhausting process, but it is very good. In
10 fact, I've recommended it, the same process to
11 some other districts. Number one -- and I'll
12 cover this in a minute -- but it makes
13 allowances to allow the people that work for us
14 to improve, to increase their education. And
15 every position was reviewed. Every position
16 and every person on the scales was examined to
17 ensure that no one would be hurt with the
18 implementation of the new schedule.

19 Now, I've never seen a superintendent sit down
20 and do this kind of stuff, but that
21 superintendent did. We established schedules
22 are competitive. We moved everyone in the
23 district to a competitive salary scale so that
24 the district could attract and keep the best
25 positions. And I'll just be honest with you.



1 You're not gon' get quality people on something
2 like this (indicating). It ain't gon' happen.
3 And, you know, it's just not there. And the
4 kind of quality people that Chester needed to
5 move their achievement were not gon' come
6 through something like that. We changed the
7 three step -- administrative asked 24 to 28.
8 We looked at -- said maybe we can't afford 28
9 steps like the teachers, but we can afford 24.
10 Now, you know what I mean by steps? A step is
11 a -- we recommend a zero, 24. You start at
12 Year Zero and then you go up 24. And a step
13 would actually look like something like this
14 (indicating). This is another study that we
15 did. And let me show you what I'm talking
16 about with a step. That's a little pay raise
17 every year all way up as they progress. And in
18 this particular case, this is a salaried
19 nursing position. And you see this is what
20 we'd like to see. Some of these districts have
21 them all over the place. Found one that even
22 had -- well, this one, for instance, a salaried
23 position, when he got up to the 24th year, they
24 got a 5,000 pay raise in one step. They
25 figured that one out. But that's the kind of



1 stuff that we see across the state.

2 Now, a clear scale for maintenance, set up

3 three levels that would reward them when they

4 increased their skills thing. And that really

5 came true to me when we took a look at the

6 maintenance thing at Rock Hill. The best

7 maintenance operation in the state is Rock Hill

8 school -- Rock Hill York 3. They have one of

9 the best setups that everybody else should

10 copy, and I recommend that to other districts

11 too. But they train themselves and increase

12 their certifications. And what we were trying

13 to get them to do was to recognize that in

14 the -- in their pay. We eliminated clutter and

15 repetition. We moved the nurses to teacher

16 scales. There were 14 other positions we moved

17 to teacher scales. We recommend now that

18 nurses be placed on a teacher scale. You don't

19 need a separate scale for nurses.

20 Create a special -- positions what were unique

21 to the district: Develop a way to assign

22 credit for previous experience. You know, when

23 you come to work in a district, you know,

24 especially, you know, in some of these

25 districts, if you're teaching, you taught ten



1 years, you move to a principal, they start you
2 out at Year Zero as a principal again. That's
3 not right. So, you know, we recommend --
4 recommended that, you know, you start out at
5 Year 11 as a principal.

6 Consolidate seven scales for food service to
7 let -- clear pathways for employees. Remove
8 nontech positions from the technical scales.
9 You now have three scales: Salary, hourly, and
10 teacher. And these technical scales and, you
11 know, it's just something threw in there.
12 Revise computer techs so that they're at
13 levels. Establish specialist positions for
14 hourly employees in critical areas such as
15 human relations and finance. And one of the
16 things we believe is, is you've got a person in
17 a finance office and that's all they've ever
18 done in finance that, you know, they're really
19 good in that area, not probably any other
20 areas, we established the specialist positions
21 for them so that you can reward that. You
22 know, I'm military. I liken it to a
23 supersergeant, you know, an E8 or E9, a senior
24 master sergeant, chief master sergeant, that
25 type of thing.

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1 Establish paraprofessional skills: That would
2 reward a person for having more education.
3 Reorganized the administration support scales
4 and gave principals the ability to make
5 assignments within their building. Provided
6 extra administrative support for larger schools
7 within the district framework. Develop three
8 levels of directors and provide more
9 compensation for directors who supervise large
10 numbers of employees.

11 You know, one of the most underrated directors
12 in the thing is the director maintenance. You
13 have to have director of maintenance has more
14 employees than probably anybody else in the
15 district. And we pay them the worst. We also
16 recommended that we add a supplement for
17 persons who've earned a doctoral degree. Each
18 high school was given 15 extra times -- extra
19 days of counselor time. That came out of this
20 that they needed. I think they were trying to
21 run counselors to register on a 210-day
22 counselor. And the school the size of Chester,
23 you need a counselor in there all the time.

24 Q: Now, I have a few follow-ups when you finish
25 that thought.



1 A: Okay. We also recommend they add a chief
2 financial officer and place that financial
3 officer over it. I mean, that's one of the
4 things that I noted with Anna. She kept saying
5 this was a -- wasn't a salary thing. Well, it
6 wasn't a staffing thing. Now, a chief
7 financial officer difference -- would know the
8 difference between a salary study and a
9 staffing study. And this was not a staffing
10 study. And a staffing study would have taken
11 another year or so to do because we would have
12 had to get in there and look at everybody's job
13 skills, what they do, compare them, realign
14 them to another situation.

15 The other thing we did was -- and I'll finish
16 in just a moment. This is a good piece of
17 work, a very good piece of work. And I'm proud
18 of this. I mean, it -- this thing ---

19 Q: And just for the record for our court reporter,
20 what's the title of the work that you're
21 referring to?

22 A: It's Salary Employees Report for July the 15th,
23 2015. This is a result of all the stuff that
24 we did looking at comparing and getting it set
25 up to do better than Rock Hill. And, you know,



1 again, we went over every position in that
2 district to keep somebody from getting hurt.
3 Some people had to freeze for a couple years to
4 get -- to let the scale catch up and that kind
5 of thing, but we made sure nobody got hurt and
6 that was because Dr. Slayman insisted that that
7 be done. And, you know, I would wholeheartedly
8 agree with that kind of stuff.

9 Q: And you segued right to one of my follow-up
10 questions. Was this salary study to try to
11 improve the salaries of essentially all of the
12 district employees and put them on par with
13 what would be expected in the state initiated
14 by Dr. Slayman?

15 A: Yeah. I mean, you know, this other thing is
16 something that's a holder. And I'll tell you,
17 I've been in many, many, many school districts.
18 I've handled 30 or 40 different school
19 districts worth of this stuff. I think about
20 36 or 37, some here in Columbia that I won't
21 even talk about. But -- and a weaker district
22 has this kind of stuff. The reason is this
23 gives the board all types of power on moving
24 people at will instead of being fair to the
25 people that work for them. You know, I've seen



1 this in and, you know, I could name the
2 districts that we've seen this in. We tried to
3 get them out of it. But, you know, it gets to
4 the point where the board tries to control the
5 daily operations of the school, and that is not
6 their job.

7 Q: And would it be fair to say that the efforts to
8 make this salary study that happened, you know,
9 clearly through 2015 up to the results
10 July 15th, 2015, fair to say that that would be
11 Dr. Slayman making efforts to benefit her team,
12 including her senior staff?

13 A: Exactly. I mean, you know, she needed better
14 people. I'm just gon' flat tell you. And
15 Dr. Slayman was long-suffering and very
16 professional. If I had been superintendent of
17 that district, I'd probably last about 15
18 minutes. Because they absolutely wasn't a lot
19 going on in a lot of buildings. And she was
20 trying to move them to help kids. She was
21 trying to get the people in there that needed
22 to be there.

23 Q: And one of the pivotal things I want to follow
24 up on your earlier testimony involving this
25 study that's important that things involved



1 with this hearing is you talked about a
2 committee and that was involved ---

3 A: Uh-huh.

4 Q: --- with the review and you listed off several
5 people. Fair to say that the senior cabinet
6 was asked for their opinion ---

7 A: Oh, yeah.

8 Q: --- by you and by Dr. Slayman to input into
9 this process?

10 A: Yeah. I mean, we had one that comes to mind.
11 Again, my memory's not like what it used to be.
12 We had one, Jeff the -- Gardner, I think his
13 name was. Jeff was saying we had a maintenance
14 guy stuck over here making over \$20 an hour.
15 And we raised the question: Why is that guy
16 there? You know, what's he doing that, you
17 know, justifies that kind of salary? And, you
18 know, Jeff told us real fast. He drives around
19 in a pickup truck with a clipboard. I said, do
20 what? He drives around with a clipboard --
21 with a pickup truck with a clipboard. He knows
22 where all the cut-offs and all the and all the
23 power couplings for all the buildings where.
24 And I said, and you're paying him \$20 an hour
25 to do that? He says yeah. I said, does he do



1 anything else? He said nothing much. That's
2 the kind of stuff that was there. And I
3 said ---

4 Q: And was it -- let me interject one -- my
5 thought on that is would it have been fair to
6 question Mr. Gardner with his supervision on
7 that individual under those circumstances?

8 A: Probably would have, yeah. You know, my
9 question to him was, you know, knowing where
10 all the cut-offs are, do like I did at my
11 school when I was principal. I made a picture
12 of them and put them in the emergency plan. I
13 knew where they were. And you could do the
14 same thing with him. I mean, he could be
15 assigned other duties. I mean, that's probably
16 some valuable experience that needs to have
17 something else to do besides ride around in a
18 pickup truck with a clipboard.

19 Q: And with the review, the committee involved
20 that you described, Charles King, was he in it?

21 A: Yes.

22 Q: Was Shawn Williams in it, the director of HR?

23 A: Yeah, Shawn was -- she was -- they were coming
24 in and out. They were in there some; they were
25 in and out some.



1 Q: And Anna Stroud?

2 A: Some. We had -- sometimes we had to go send --
3 get Anna's assistant, some shaggy long-haired
4 guy or a long beard or something. I don't --
5 I think he shaved and threw me off there. But
6 anyway, we get them in there to help us out.
7 Because, again, we wanted to know down the
8 line -- all right. And it wasn't happening --
9 when you start one of these scales, it may not
10 affect a person through 12 years. But down 15
11 or 16 years, may be where they have to take a
12 hit. We had to look at all that. And what we
13 wanted from them was simulations to see -- you
14 know, to see it to see what it was gon' cost.

15 Q: And when the salary study was going on, fair to
16 stay that that would relate to Anna Stroud in
17 her role with finance?

18 A: Uh-huh.

19 Q: Sorry. For the record, verbal?

20 A: Yeah -- yes.

21 Q: Did you have any impressions over if she felt
22 her job was threatened in any kind of way?

23 A: I have knowledge -- and that's based on a
24 thing -- that Anna was told by the board that
25 she needed to upgrade her credentials, that if



1 she was gon' be the director of finance. It
2 was something along with that. Because we sat
3 in on a board meeting and, you know, that came
4 up in that board meeting. And I'm not sure who
5 were the other board members there. I think
6 the board chairman was there and Dr. Slayman
7 was there. And it came up. And the thing
8 that -- the point that was made, either by
9 Dr. Littlefield or myself is that we're not
10 trying to take Anna's job. We don't want
11 anybody to lose their job. What we're saying
12 is you need a chief finance officer. And Anna
13 can, you know, move back into a specialist
14 position or something. It was nothing to take
15 Anna's job. Now, that's what I'm aware of.

16 Q: And for a school district based on -- I think
17 you said you've done salary studies in 36, 37
18 different school districts around
19 South Carolina. Do -- in those districts that
20 you've observed, do their head finance person
21 have the educational requirements to perform
22 that job?

23 A: Pretty much. Pretty much. Just one or two.
24 Now, let me say this. I've been in those
25 districts, and I've used their things to



1 develop the studies that we've done, okay?
2 Let's make sure we understand that. But, yeah.
3 There's only one other district that really
4 doesn't have a finance person that's actually
5 doing their job. She has the title, but that
6 district is in deep financial trouble. In
7 fact, I think it came out in the paper this
8 morning. But in deep financial trouble. And
9 the -- but, you know, she was a superintendent
10 secretary that moved to a finance director, if
11 you can figure it out that way.

12 Q: And you referenced earlier an in your testimony
13 just a few moments ago that you were at a board
14 meeting and Dr. Slayman was there. Accurate to
15 say that Dr. Slayman was advocating not to
16 remove Anna Stroud from her job?

17 A: Well, wanting to give her a different job. We
18 wanted to bring a chief financial officer in.
19 And, you know, and there was also talk about
20 letting Anna stay 'till she got her TERI or got
21 whatever it was and then go from there. There
22 wasn't anything about throwing Anna out of the
23 door that day. And, you know, that point was
24 made loud and clear in that meeting.

25 Q: With regard to your time with Chester County



1 School District while you were serving as a
2 consultant, did you ever observe Dr. Slayman
3 treat anybody with what you would consider
4 hostility?

5 A: No, I did not.

6 Q: Did you ever observe Dr. Slayman raise her
7 voice to any of the people who she supervised?

8 A: No.

9 Q: Did you ever observe Dr. Slayman make any type
10 of threats to anyone she supervised?

11 A: No.

12 Q: With regard to any conversations that you and
13 Dr. Slayman have had, did you at any time think
14 she ever used odd word choice?

15 A: No. Now, she's a little gamecocky but, you
16 know ...

17 Q: And I think I follow what you mean, but just
18 define what you mean just so that ---

19 A: No.

20 Q: --- we're all on the same ...

21 A: No. She'd give them that old garnet and black
22 every now and then but ...

23 Q: And you're a Clemson fan?

24 A: Yeah. Well, yeah (indicating).

25 Q: Right. Okay. Just making sure -- you know,



1 again, gamecock in South Carolina, we all know
2 that that's probably the USC, but it could also
3 have context to any other terminology.

4 A: Or it may be something.

5 Q: Which is, i.e., the examples so much in this
6 case is about what different meanings can mean
7 about words. Let's see. When you were at the
8 district office in Chester County School
9 District, how many times do you think that was?

10 A: I don't know. It was a bunch. We started in
11 2013 and in 2015, and there were times that we
12 would -- we'd be down there for schedule work.
13 We were also doing aspiring principal training
14 in Chesterfield and Marlboro Counties. And we
15 could come by and stop in to see her about
16 various things and talk to her as we were going
17 through, because we had to go right by Chester
18 on Highway 9 back to Spartanburg. Our business
19 runs two ways, Highway 9 and Highway 321. And
20 those particular things and all those districts
21 are on those two main roads.

22 Q: During times that you were in the district
23 office, were you ever in the vicinity of
24 Dr. Slayman's physical office?

25 A: Yes.



1 Q: How often would you describe you observed her,
2 you know, door open versus closed percentage of
3 times you were there?

4 A: I don't know. We just -- if she had somebody
5 in there in a private conversation, door was
6 closed. And but, you know, we'd go into
7 Callie's office and, you know, wait there until
8 she could see us. Or they'd put us in a
9 conference room right next door.

10 Q: But when you -- when she wasn't already meeting
11 with someone, did -- was the door open or
12 closed?

13 A: It was open, yeah.

14 Q: What kind of interactions did you observe
15 between Dr. Slayman and her senior staff's --
16 for instance, Charles King, Anna Stroud, Jeff
17 Gardner, Shawn Williams, and Brooke Clinton?

18 A: Professionally, I did not see any, you know,
19 negative things, I mean ...

20 Q: And were you aware of when the -- Betty Bagley
21 issued a report and it was publicized in the
22 media? Did you see that?

23 A: I saw it in the media; yeah.

24 Q: And what was your impression of it?

25 A: I thought it was a hit job.



1 Q: And what do you mean by that?

2 A: I meant it looked to me like somebody was
3 conspiring to damage the superintendent, and it
4 ruined all my positive feelings about Betty
5 Bagley.

6 Q: With the Bagley report and your personal
7 observations, were they different, meaning your
8 personal observations than what you were
9 reading about?

10 A: Yes, they were.

11 Q: And how so?

12 A: I was just surprised at, you know, how they
13 made Dr. Slayman out to be such an ogre. I
14 mean, you know, I said, are we talking about
15 the same person? You know, and it looks to me
16 like things were just taken out of context and,
17 you know, negatively interpreted, and sent back
18 towards her.

19 Q: Did you ever hear Dr. Slayman make any negative
20 statements about the sheriff's department?

21 A: No. We came in to a board meeting when that
22 thing happened. But, no. All I know is that
23 the board was voting on replacing the sheriff's
24 deputies with private security. In fact, we
25 are sitting ready to go into the board meeting



1 when some of those private security people and
2 the sheriff, I think, were sitting there. But,
3 you know, that wasn't purview of our activity.

4 Q: In terms of when you were present, was there
5 discussion on why the board was voting to put
6 in private security?

7 A: The -- not directly. You know, it was -- we
8 assumed that it was for -- just a money-saving
9 thing, which now is a common practice to do.
10 I mean, have any of you ever seen Richmond
11 County, Georgia, down in Augusta? They have
12 their own police force with a chief with
13 detectives that works in the school district.
14 I mean, they have they own police force.

15 Q: Was the salary study -- you know, I know that
16 the -- both the SROs, when they were in place
17 and the private security are separate in terms
18 of how ---

19 A: Yes.

20 Q: --- you know, they're not considered employees
21 of this district, but was any of the security
22 personnel part of the salary study?

23 A: No.

24 Q: But were you aware of what the finances would
25 be comparative to SROs versus ---



1 A: No.

2 Q: --- private?

3 A: No. All in very, very, vague, general terms.

4 Q: Based on your years as a school administrator,
5 who would be the -- who would be communicating
6 directly with the board typically in a school
7 district?

8 A: I'll tell you my experience. I'm from
9 Spartanburg County, and I worked for a range or
10 superintendents. The board has on one
11 employee: That's the superintendent. The
12 principals, the district staff is not to
13 communicate with the board. Now, the board can
14 ask them questions. But if they go to
15 getting -- and both boards in those districts
16 in which I worked, I had friends on the board.
17 However, you know, some people I've known a
18 lifetime. However, I would not discuss school
19 policy with them. And when they came up
20 discussing school policy, the minute I could
21 get away from them, I either e-mail the
22 superintendent or called them. I worked for
23 Buddy Jennings in District 2. Buddy Jennings
24 did not like surprises. And you would not want
25 the superintendent to get a question in an open



1 board from something I ran my mouth about, and
2 I wouldn't want it. I wouldn't be there too
3 long. Because the protocol is you work for the
4 superintendent. That's the way we did this
5 salary study and the way we function in all the
6 districts in which we work. We work for the
7 superintendent. We worked in one district and
8 they called us and want us to come back and
9 meet with the board. We said no. We're not
10 coming back and meeting with the board. They
11 were trying to get us between the
12 superintendent and the board. We work for the
13 superintendent. They had had their
14 presentation. But, no. I -- that's -- you
15 absolutely, you know, and you'll run into board
16 members. They're in the community. You know,
17 it's not anything you can do about it. But you
18 don't let that superintendent hang out in the
19 open. That's just wrong.

20 Q: And during the times that you've worked with
21 Dr. Slayman, have you ever observed her
22 intentionally mislead anybody?

23 A: No.

24 Q: Have you ever observed her act in any manner
25 that you felt was not appropriate as a



1 superintendent?

2 A: No.

3 Q: During the salary study that you performed, did
4 the senior staff ever discuss with you any
5 concerns they had about Dr. Slayman?

6 A: No.

7 Q: And I think -- I have a note about a reading
8 program. Did you also ---

9 A: Yeah. We had a reading program that was done.
10 And we had -- we set up a reading program
11 down in Chester and in Chesterfield, and I
12 think we had some in Marlboro too. But anyway,
13 it was set up with some very, very outstanding
14 reading people. And this was before Nikki
15 Haley introduced it to the legislature to have
16 a reading program. And we were training
17 reading teachers. And I forget -- I was doing
18 some of the data on it but -- and we were
19 looking at, you know, training teachers and
20 trainings principals. What we wanted to do was
21 for the principals to be able to go in and
22 recognize, you know, when a teacher was doing
23 a good job reading. I tried training their
24 principals on going in and trying to recognize
25 when a teacher was teaching to the standards.



1 And they blew it off. And, you know,
2 apparently there just wasn't -- wasn't
3 important to them or something. And I don't
4 think that reading program was anything but --
5 you know, it was just kind of not important to
6 them too.

7 But it is an outstanding reading program, and
8 it worked very well for Harrison down in his
9 district. And, you know, we did staffing -- I
10 did staffing over at Chester High School. Paid
11 a visit to them. Went in their classrooms.
12 All I heard going in there was how bad the kids
13 were at Chester High School. They're terrible.
14 They're all over the place, this, that, and the
15 other.

16 Number one, that building lends itself to the
17 problems because it's, you know, made with
18 those -- old pod concept like Laurens and
19 Greenwood and Chapman Elementary and
20 Spartanburg and all them. And, you know, it's
21 hard to supervise kids in that building. I
22 mean, I asked the principal, I said, how many
23 doors do you have to lock before you go home?
24 Each classroom had a outside door. You imagine
25 that in this day of security. 81 doors had to



1 be locked and checked. So, you know, I
2 observed the kids between the times I was
3 working with the teachers. Those kids weren't
4 bad. They were just high school kids. And,
5 you know, weren't bad kids at all.
6 And then when I went in and observed the
7 teachers, I found some interesting things. I
8 did a presentation and the teachers talked to
9 them about their report card, which wasn't
10 good. They had an F on school improvement and
11 trying to explain to them why that was a bad
12 thing. They didn't seem to have a concept that
13 an F is a bad thing on a report card. Of
14 course, State department wasn't doing anything
15 to follow up on it to hold them responsible for
16 it. So, you know, they just blew it off. But
17 went in one classroom, ninth grade physical
18 science teacher. And what I look for when I go
19 in a classroom, I look -- if you look at the
20 teachers when they're teaching, teaching is a
21 series of small events hooked together.
22 Lauren Anderson, we had a training session.
23 Lauren trained us on how to take a look at
24 this. One good thing about University of
25 South Carolina was Lauren Anderson. And Lauren



1 came by and trained us on how to do this. And
2 you look at the kids. You look at what the
3 teacher does. And that teacher in that
4 particular classroom wasted about 30 minutes of
5 that class period with the most inane thing
6 I've ever seen of showing kids pictures of lab
7 equipment, not even color pictures, and having
8 them identify it on a test. And my question of
9 her is, you got this whole lab right behind
10 you. Why not take ten minutes, take them back
11 there, and show it to them? Why did you waste
12 all that time on that? And that's the kind of
13 thing we saw. US history, for instance, it was
14 terrible.

15 Q: When the -- is that all tied in with kind of
16 this reading program that you were helping to
17 try to facilitate in the school district ---

18 A: No. That reading program is primarily
19 elementary and middle. I was looking at high
20 school.

21 Q: And following this thread of thought, you
22 know -- and this is just a summary of my
23 thoughts -- is that you tend to be, you know,
24 an open, honest, frank person; is that fair to
25 say?



1 A: Yes.

2 Q: And that you don't beat around the bush?

3 A: No.

4 Q: And so fair to say that when you interacted
5 with Dr. Slayman, there -- I'm sure there were
6 probably times maybe you didn't agree with each
7 other?

8 A: Very rarely. I know, you know, she'd call and
9 say I want you to take a look at this. Oh,
10 heck not again. But, you know, we operated
11 on -- our business on a very simple thing: The
12 customer's always right. We're not in
13 education. We're a service company. So the
14 customer's right. She want it that way; she
15 got it that way.

16 Q: It -- but you were willing and able to give
17 opinions to her they maybe she didn't agree
18 with?

19 A: I'm sure. I'm sure.

20 Q: So during those times where maybe you're being
21 open and honest and maybe telling Dr. Slayman
22 things that she might not want to hear about
23 her school district, did she ever react in a
24 hostile way towards you?

25 A: No.



1 Q: And did you ever see her act that way towards
2 anyone else?

3 A: No. And, you know, and I'll just tell you up
4 front. She had acted that way, I'd walked out.
5 Because, number one, we weren't get paid to do
6 that. All this data stuff and this extra stuff
7 was above and beyond what we did for the school
8 district. That was value-added stuff that we
9 just threw in trying to help them. You know,
10 I wanted them to be successful. We were there
11 working with them. We walked out of that
12 district, we wanted that district to improve.

13 Q: And when you gave information good, bad, and
14 ugly to Dr. Slayman about the district and
15 obviously, as she is the leader of it, some of
16 it's gonna be good; some of it's gonna be bad,
17 did she ever react towards you if you gave
18 feedback that maybe wasn't, say, an, oh,
19 Chester County School District's the best
20 school district in the whole state of
21 South Carolina, did she react in a way that you
22 found outside of the norm of how a
23 superintendent should react to good, bad, and
24 in between new about their district?

25 A: No. No. And I -- you know, and I didn't hit



1 her over the head with a sledge hammer either.
2 You know, I gave her the information she needed
3 to know. That teacher in Chester High School's
4 wasting time in that classroom. That's hurting
5 your physical science EOCs doing that. She's
6 not getting the stuff there, those kind of
7 things. You know, I'm not gon' hurt somebody
8 but, you know, I told it like it was.

9 Q: And with your -- you know, and my first initial
10 kind of question was about your credentials and
11 I'm gonna summarize and say you've had a
12 successful career in the education field.
13 Based on that career, when you enter a school
14 district, do you feel you're able to make a
15 measurement of what that morale might feel
16 like?

17 A: Sure. I can tell you walking in the front
18 door.

19 Q: And what was your assessment from the time that
20 you were in Chester County School District
21 about morale?

22 A: The thing is you can tell if good things are
23 going on in the school by looking at what is
24 happening at the front desk. If you go in that
25 school and it's lined -- the walls are lined



1 with dead white men and all this kind of stuff,
2 and there's nothing there showing what the kids
3 are doing, then you've got a dead place. You
4 know, the morale was fine. You know, they'd
5 look up; they'd acknowledge you.

6 The lady at the front desk, when we come in the
7 district office, is just as nice as she could
8 be. If we needed to see somebody, they'd come
9 out and get us, take us back to their office.
10 There wasn't any problem with the morale. And,
11 you know, but I just wish they'd been a little
12 student centers, especially in the schools.
13 And that's something that, you know, with the
14 culture -- and I do a lot of work with schools
15 with culture -- it takes six to eight years to
16 change something like that. You just don't do
17 that overnight.

18 Q: And would the same be true that if it's a good
19 culture, it's not gonna change overnight to a
20 bad one?

21 A: No.

22 Q: How so?

23 A: Well, I've seen good cultures ruined real fast
24 by changes in the board and changes in the
25 superintendent. And I'll use an example of one



1 school district, which would work. They were
2 third in the state in improvement scores.
3 Things were really clicking along. They were
4 improving. The superintendent left. They
5 brought in a new superintendent. The board
6 started telling the superintendent what to do.
7 Pew, bottom dropped in. They're down there
8 with Allendale right now, and the bottom
9 dropped out. And the good teachers, the other
10 districts stole the good teachers.

11 And that's -- you know, you can make an
12 environment where it's -- where you can't keep
13 good people. And just plain and simple, if
14 it's not going on in that classroom, it's not
15 going on. And as a principal, that was my job,
16 to make sure that they had what they needed to
17 facilitate what they needed to have what they
18 need in that classroom.

19 Q: And following that thread in terms of things
20 that can change a culture, were you part of
21 the, you know, board meetings and things when
22 Dr. Hughes became part of the school board?

23 A: Who's Dr. Hughes?

24 Q: One of the former school board members for
25 Chester County School District.



1 A: I don't think he was on the board when I was
2 there for a lot of that stuff 'cause I think --
3 this was one doctor of something that goes off
4 and then came back on or something.

5 Q: Uh-huh.

6 A: Was that him?

7 Q: Most likely. He's the only one I'm aware of.

8 A: Yeah.

9 Q: With regard to Anna Stroud, when you interacted
10 with her, did she ever talk with you about her
11 connections to Dr. Hughes?

12 A: No. I didn't want to know that. My job wasn't
13 there to get into board politics with the
14 district. I didn't want to know the politics.
15 Our job is to be the lone ranger. We gon' come
16 in; we help them; we leave our silver bullet;
17 and we go. And they say who was that masked
18 man.

19 Q: And with regard to the senior cabinet, there
20 was -- some of the senior cabinet members or
21 the grievants involved in this matter, did any
22 of them ever discuss with you any of their
23 concerns?

24 A: No.

25 Q: When you read about what the accusations were,

