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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 V

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1 did they reflect the same experience that you'd
2 had with Dr. Slayman?

3 A: No. It was surprising.

4 Q: I think I've covered most of the questions that
5 I wanted to ask you. Something might trigger
6 after, you know, after some follow-up. But my
7 last question would be: Is there anything else
8 that I haven't covered that you think is
9 important for Ms. Pike to consider during this,
10 you know, potential disciplinary hearing with
11 regard to Dr. Slayman's certificate?

12 A: No. I can't think of anything. It's just
13 surprising. I am surprised that something like
14 this would get this far, and I'm astounded. I
15 mean, you got teachers -- you got one over here
16 at A.C. Flora today that's just exposed himself
17 on the Internet.

18 MR. WINBURN: We'll suspend him by the end of the
19 day probably.

20 A: Yeah, yeah. You know, that kind of stuff is
21 where you suspend a certificate. And I'm just
22 surprised. I don't think that, you know, this
23 merits this.

24 Q: Thank you. And Mr. Winburn may have questions
25 for you followed by also Ms. Pike, of course.



MR. MOORE - CROSS-EXAMINATION BY MR. WINBURN:

Q: Mr. Moore, my name's Scott Winburn. I'm a lawyer for the Department. I just got a few questions to follow up on. So you said, I think, that the folks that were working were for the district that you interacted were good people; is that fair to say?

A: Uh-huh.

Q: Sorry. Is that a "yes"?

A: Yes. That's right.

Q: All right.

A: I mean, I was impressed with Charles King. I thought Charles King was a man of honor. He's a Marine. Even had the yellow footsteps in his office.

Q: Right.

A: And I'm an Air Force officer, and I thought -- I was impressed that he was a man of honor. And, you know, this astounds me.

Q: What astounds you?

A: This conspiracy happened.

Q: How do you know it's a conspiracy?

A: Well, that's what she said.

Q: I'm asking you.

A: Yeah. That's the only thing I know is what ---



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1 Q: All right.

2 A: --- what was intimated here just a minute ago.

3 Q: You intimated it?

4 A: No. Y'all did, just a second ago.

5 Q: Okay.

6 A: You were talking about the other people in
7 the -- you know, other senior staff.

8 Q: All right. So you mentioned earlier that --
9 and please don't -- you know, don't -- I'm not
10 trying to quote you on it, but you basically
11 said based on the Bagley report that you've
12 lost any respect for Betty Bagley; is that fair
13 to say?

14 A: Yes. That's exactly right.

15 Q: And why is that?

16 A: I thought she did a hatchet job on a former
17 fellow superintendent myself.

18 Q: Have you ever talked to Betty Bagley about it?

19 A: No. I won't talk to her. I don't have any
20 reason to.

21 Q: When you have strong opinions about it, why do
22 you think that up to this point in your life
23 did you change your mind about Betty Bagley?

24 A: She did a great job in Anderson 5. She did a
25 great job in one of these districts down here.



1 Good instructional superintendent. But then to
2 take a job like that and to take the stuff that
3 was reported on Dr. Slayman, just astounded me
4 that somebody would do that.

5 Q: Did -- do you know whether the board took any
6 action on that in Betty Bagley's report?

7 A: Do what?

8 Q: Do you know if the board took any action on
9 Betty Bagley's report?

10 A: No. No.

11 Q: You don't know, or the answer is no?

12 A: The answer is no.

13 Q: Okay. It blew it off?

14 A: I don't know which board.

15 **MS. POLVI:** Object to the form.

16 A: Which board?

17 Q: The school board.

18 A: Which one are you talking about?

19 Q: The school board.

20 A: Chester School Board?

21 Q: Yes.

22 A: All I know is what I read in the paper.

23 Q: Okay.

24 A: In the Chester times or whatever that paper is.

25 Q: All right.



1 A: I mean, I had no interaction with the board
2 after that.

3 Q: But before this -- and I'll just submit to you,
4 submitted -- or the date on the report is
5 September 3rd, 2015. Before that date and --
6 or before you read it, I'd say, you understood
7 Betty Bagley had a good reputation?

8 A: Yes.

9 Q: All right. And in your mind, she ruined her
10 reputation ---

11 A: Yes.

12 Q: --- is that true? Okay. Do you know
13 Ms. Bagley is a witness in case?

14 A: I don't know.

15 Q: Okay.

16 A: Not my -- not my responsibility.

17 Q: What did you do to prepare for your testimony
18 today? Did you talk to Ms. Slayman?

19 A: No. Dr. Slayman gave us the times and all
20 that, and I printed this stuff out because I
21 wanted you to see what we did.

22 Q: Okay. So you did a salary study; is that
23 correct?

24 A: That's correct.

25 Q: And you do salary studies to help districts?



1 A: Right.

2 Q: 'Cause they may not have the expertise to
3 go ---

4 A: Right.

5 Q: I'm sorry. Let me finish my question. To go
6 into as much depth and to be as thorough as you
7 have been?

8 A: Right.

9 Q: And you've been in 30-something districts?

10 A: We've done -- we've taken the salaries of
11 30-something districts. I think we're 10 of 15
12 different studies. So, for instance, this is
13 a study of Chesterfield County. We done
14 Spartanburg too. We have done Rock Hill.
15 We've done McCormick. We've done, oh, I don't
16 know -- Marlboro and, you know, all over the
17 place.

18 Q: Right.

19 A: But that's a Chesterfield study. I just
20 brought to show you. We've gotten very
21 sophisticated procedures on that now.

22 Q: Right. And so you present that, and you
23 provide expertise; is it fair to say?

24 A: That's correct.

25 Q: To districts that otherwise just don't have the



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1 capacity maybe or the time or the energy, the
2 money to be as thorough as you?

3 A: That's right.

4 Q: All right. And that's what you provided
5 for ---

6 A: Right.

7 Q: And one of the beneficiaries of that study
8 would have been Anna Stroud; is that correct?

9 A: Yeah.

10 Q: Now, you also said we wanted to move her back
11 into a -- or -- I'm sorry. Let me strike that.
12 I understood you to say that the idea may have
13 been to move Anna back to a specialist
14 position?

15 A: Yeah. Or some other thing. She probably would
16 have retained her salary. But, you know, I won
17 her recommendation, and it -- very clear in
18 that meeting that was had that we would -- Anna
19 was not to be fired.

20 Q: Was she in that meeting.

21 A: No.

22 Q: All right.

23 A: This was in executive session.

24 Q: All right.

25 A: And it came -- you know, we're not talking



1 about firing the woman. One of us said that
2 and, you know, the idea was that she continue
3 on 'til he retired.

4 Q: Right. But as I ---

5 A: Bring a chief finance officer.

6 Q: I understand your testimony, based on your
7 discussions with Anna that she did not want
8 anyone to be hurt?

9 A: Dr. Slayman did not want anybody to be hurt.

10 Q: But you testified earlier that Anna Stroud kept
11 saying I don't want anybody to get hurt?

12 A: Yeah.

13 Q: Is that true?

14 A: Yeah, that's true.

15 Q: All right. So she said it; Dr. Slayman said
16 it; and you say it?

17 A: Yeah.

18 Q: Y'all all said the same thing?

19 A: Yeah.

20 Q: Okay. All right. So y'all did what Anna
21 Stroud wanted to do; is that right?

22 A: We did, you now, to protect the people of the
23 district; yeah.

24 Q: Right. Now, you said she needed better people,
25 meaning Dr. Slayman?



1 A: Yeah.

2 Q: Who are you thinking about whenever you say

3 that?

4 A: Principals were weak. I'm not gon' call names.

5 Heck, I don't even remember some of the names

6 but principals ---

7 Q: Anybody else?

8 A: Principals were weak.

9 Q: Okay.

10 A: I had some questions about some of the district

11 office staff.

12 Q: Like who?

13 A: Well, I was concerned about some of the

14 instructional stuff.

15 Q: All right. Would Jeff Gardner be one of those

16 you were ---

17 A: No. Jeff ---

18 Q: --- concerned about?

19 A: No. Jeff, I wasn't concerned about Jeff.

20 Q: Okay.

21 A: And I thought that Charles was doing a good

22 job.

23 Q: Okay.

24 A: That was my impression. I did have concerns

25 about Anna. And Shawn, I never did get to know



1 her that well. I just had just a few
2 interactions with her. I was down there one
3 time, she gave me the flu but ...

4 Q: Now, I think -- I'm sorry to retread on this.
5 Anna Stroud back to a specialist position, does
6 that mean that she was either undertaking
7 multiple positions at the time of the salary
8 study?

9 A: No.

10 Q: What do you mean by that?

11 A: She was director of finance for the district.

12 Q: All right.

13 A: There's no multiple positions there.

14 Q: All right.

15 A: Now, I did note that she was doing things that
16 a director of finance should not be doing. I
17 was there working on something else one day.
18 Anna had all this money and all on her desk.
19 A director of finance doesn't do that. That's
20 a secretary's job.

21 Q: Right.

22 A: And, you know, I don't doubt Anna was working.

23 Q: Right.

24 A: And working hard. But my thing was just bring
25 in a chief financial officer to coordinate the



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1 whole thing.

2 Q: And was she do -- or in your view, was she
3 undertaking any activities that a CFO would
4 normally undertake?

5 A: She was, yeah.

6 Q: Okay.

7 A: But she didn't have the qualifications to do
8 so.

9 Q: Understood.

10 A: And the board had already apparently had made
11 that point.

12 Q: Now, you also testified about communicating
13 with the board. Did you mean to say that
14 employees of the district are strictly
15 forbidden from communicating to the board for
16 any reason?

17 A: Absolutely.

18 Q: Okay. Do you think that's constitutional ---

19 A: About school matters.

20 Q: Okay.

21 A: You do not talk to the board. You work for the
22 superintendent. If you got a problem and you
23 need to appeal, you go to the superintendent
24 first, then to the board. But you don't have
25 that right to go around undercutting a



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1 superintendent.

2 Q: I'm not talking about undercutting. I'm
3 talking about communicating.

4 A: Yeah. We don't communicate.

5 Q: Period.

6 A: No.

7 Q: Okay.

8 A: Now, they may ask you questions and you have to
9 answer them truthfully, but you better tell
10 that superintendent that.

11 Q: All right.

12 A: I mean, that's the way we operate in
13 Spartanburg County.

14 Q: Well, we're talking about Chester County.

15 A: Yeah, I know. And I wish everybody operated
16 like Spartanburg County. We wouldn't have the
17 problems we have in this state.

18 Q: How many districts y'all got in Spartanburg?

19 A: Seven.

20 Q: Yeah. Okay.

21 A: And they're all darn good.

22 Q: Okay. Now, how many days -- I don't know if
23 you -- we got to a round number. How much days
24 were you in the office suite where Charles
25 King, Jeff Gardner, and Dr. Slayman and the



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1 rest were?

2 A: About -- you mean, how many days I was in the
3 district with -- back there?

4 Q: No. For the period of time that you were
5 there, you were there for 2012 to 2013?

6 A: 'Till 2015 really. We did the final report to
7 that board in November 2015 but ...

8 Q: So how often would you be on site?

9 A: Maybe once a month, something like that.

10 Q: All right.

11 A: Now, sometimes I was down there for three or
12 four days a week. And, you know, we were going
13 back and forth to Chesterfield and Marlboro
14 and, you know, I can't tell you how many days.

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

16 A: And when we visited that -- you know, we were
17 visiting to get more input on what we need to
18 do. And we didn't charge for that kind of
19 stuff.

20 Q: Okay. Thank you.

21 **HEARING OFFICER:** I don't have any questions of
22 Ms. Moore.

23 Do you have any follow-up?

24 **MS. POLVI:** Huh-uh. Mr. Moore, thank you for your
25 time and coming today. We appreciate it.



1 Do you need any of that for on the record in
2 terms of ---

3 **HEARING OFFICER:** I don't. Now, it's up to you
4 whether you want to put it on the record.

5 Mr. Moore, with your indulgence, can I take a
6 peek at it and see ---

7 **MR. WINBURN:** We can stipulate to some of it if you
8 want. I mean ...

9 **THE WITNESS:** And this -- I mean, there's some
10 missing stuff in here. I mean, this file was
11 a foot thick when I threw -- finally cleaned it
12 out. And I printed this off the computer.

13 **MS. POLVI:** Maybe -- 'cause I think these two are
14 the ones you referred to the most.

15 **THE WITNESS:** Yeah.

16 **MS. POLVI:** Maybe -- do you have those in electronic
17 where you could e-mail them to me and ---

18 **THE WITNESS:** Yeah. I can. I don't -- I'm not --
19 I'm away from my office now, but I can to that.
20 But you ---

21 **MS. POLVI:** Even -- 'cause we have a continuance.
22 Even if you can't do it today.

23 **THE WITNESS:** Okay.

24 **MS. POLVI:** You know, early next week or ...

25 **THE WITNESS:** And here's some other things too



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1 that -- like we look at ELA growth and past,
2 compared for -- this something we never do. We
3 help the districts that actually students. We
4 matched them up to look at the growth. We
5 looked at that to try to provide them --
6 provide the district that. Math failure
7 reports, we developed math failure reports to
8 go in the classroom.

9 Dr. Slayman had a question about facility
10 issues. This is a map where every kid in the
11 district by grade lived. We created that for
12 them. Those are the kind -- and we didn't
13 charge for that stuff. This is showing how
14 well one particular school did on ELA, and you
15 can see -- this was color coded. You see that
16 they didn't do too well.

17 And it's just, you know, my thing is this:
18 We've sat here and we've discussed all this
19 stuff, hadn't said one darn thing about student
20 achievement and how this affects student
21 achievement. In this state, we spend more time
22 doing these kind of things about adults than we
23 do about what's in the classroom and what's in
24 student achievement. Adults are some of the
25 biggest problems we have in our school



1 districts. And if you look at some of these
2 failing districts that you've got across the
3 state, they're not constituted for kids.
4 They're constituted for adults. And they're
5 constituted for the adults to profit. And can
6 name you boards and examples and every thing
7 else.

8 **MS. POLVI:** We've taken over three districts. We
9 know.

10 **THE WITNESS:** Yeah. Well, you should have taken
11 them over a lot earlier.

12 **MS. POLVI:** Well, I wasn't here then.

13 **THE WITNESS:** And I'll tell you. I bet you I could
14 tell you to some rocks to look under.

15 **MR. WINBURN:** We might -- go off the record.

16 (Off the record.)

17 (Witness excused.)

18 **JIMMY LITTLEFIELD**, having been duly sworn, testifies
19 as follows:

20 **MR. LITTLEFIELD - DIRECT EXAMINATION BY MS. POLVI:**

21 Q: Good afternoon Dr. Littlefield.

22 A: Hello.

23 Q: I'm Shannon Polvi. I'm an attorney for
24 Dr. Slayman during this essentially
25 disciplinary hearing that we have before



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1 Ms. Pike, and I'll be asking you questions
2 today. We're gonna get to things that relate
3 directly to her time as superintendent in
4 Chester.

5 A: Okay.

6 Q: But first, I want to get a little more
7 information about you. What are your
8 professional credentials?

9 A: I have a teaching certificate. My certificate
10 was first issued in 1969, so this is my 50th
11 year of having a South Carolina certificate.
12 I have a teaching certificate, supervisor,
13 principal, superintendent. I served as a
14 teacher for two years, a district-level
15 administrator for 16 years, a superintendent
16 for 23 years. And I retired. Currently, I
17 have a consulting company. We've been
18 consulting with school districts for eight or
19 nine years now since retirement.

20 Q: Okay. Well, thank you for that background. I
21 want to ask a little bit of follow-up about
22 time frame as -- during the time that you were
23 superintendent. How many school districts did
24 you supervise?

25 A: One.



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1 Q: And were you ---

2 A: I was in Spartanburg County School District 1,
3 which is one of seven school districts in
4 Spartanburg County. The way we operate, you're
5 responsible for your school district. But then
6 every six years -- seven years, you're
7 responsible to be the chair of the entire
8 county. And by that, some of the countywide
9 decisions come your way. For example, by
10 closing school is a good example, since you
11 closed school yesterday. You coordinate the
12 closing of school. You actually serve as the
13 clearinghouse for that and why you don't make
14 the decision, you're the person responsible for
15 that. And any countywide decisions come your
16 way in the seventh year you, as a
17 superintendent, have to be responsible for
18 that, even though you have to pull the other
19 six superintendents together to make those
20 decisions and it's still that way today.

21 Q: And just in terms of, again, also some
22 background, as Ms. Pike's familiar with the
23 education field, but nonetheless, I think it's
24 important to have on the record. You know, as
25 a superintendent, what are the primary kind of



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1 duties and responsibilities of a
2 superintendent?

3 A: Well, the superintendent is responsible to a
4 school board. The school board in our case was
5 nine members who were elected. And those
6 individuals hired me -- their primary
7 responsibility is to employ the superintendent.
8 The superintendent's responsibility then is to
9 make sure that all the policies, the school
10 board are implemented, that the laws of the
11 state of South Carolina and the federal
12 government are implemented. And then you're
13 ultimately responsible for the all the other
14 departments in the school district. You're
15 responsible for hiring the district level
16 people. Then you are responsible for hiring
17 the principals, who then are responsible for
18 hiring the teachers. But at the end of the
19 day, all that responsibility comes back to you.
20 So you're overseeing personnel, curriculum,
21 operations, maintenance, transportation
22 anything that can go on in a school district,
23 ultimately you're overseeing it or responsible
24 for. And you're held accountable for held by
25 your school board, who then holds -- is held



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1 accountable by the community.

2 Q: And there's -- at the essence, this is a
3 complaint about a hostile work environment with
4 regard to Dr. Slayman's senior cabinet. And so
5 I want to ask some follow-up about the
6 interactions, you know, best practice-wise
7 between the senior cabinet and a
8 superintendent. With regard to the
9 communications that go between a superintendent
10 and a senior cabinet, how would you describe
11 what you would think is a norm?

12 A: Well, the norm in terms of anything that goes
13 on in the school district?

14 Q: With specifics to the senior cabinet and the
15 superintendent.

16 A: Okay. First of all, there has to be direct
17 communication in a meeting. So you have
18 meetings, and you would have direct
19 communication with those individuals. There
20 each one of them, of course, would have their
21 own place in the district office. By that, I
22 mean office. And then you would, on occasion,
23 go directly to those offices to have
24 communication with them. You have e-mails that
25 would go to them. But so much of the



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1 communication goes on in direct communication
2 with the individual in their office or
3 somewhere in that building, or in meetings with
4 them individually or collectively.

5 Q: And following on that thread, would it be
6 normal for a superintendent with senior cabinet
7 to sometimes have scheduled meetings but
8 sometimes superintendent need to talk to one of
9 their senior cabinet members with a sense of
10 urgency?

11 A: Yeah. And I would say that that second one
12 that you described is more common than the
13 first, because you can have scheduled meetings
14 and those meeting can go on. But as a
15 superintendent, if something happens and you
16 need to go meet with an individual person,
17 you're the boss, so you go in and no matter
18 what they're doing, they need to see you. You
19 need to communicate with them. So many times
20 that takes place in the individual office of
21 that department, or it could happen in the
22 superintendent's office when an employee is
23 called to the superintendent's office.

24 Q: And when you were serving as superintendent
25 roles, how frequent would you, say, go to a



1 senior cabinet member of your staff with a
2 sense of urgency-type of matter? How frequent,
3 a couple times of day, once a day, less?

4 A: Well, I would go -- on a normal day, I would go
5 to probably see some of those people sometimes
6 two or three times a day. As far as urgency is
7 concerned, that's hard to quantify to me. But
8 if you had -- an urgent situation come up, then
9 you would go take care of it. And I think the
10 first example that I gave or the first scenario
11 was probably more prevalent, more common where
12 you just go meet with those people about
13 situations as to whether it's dealing with a
14 personnel situation or your maintenance
15 director or, you know, an assistant
16 superintendent for personnel. Just go meet
17 with them about a matter that has come to your
18 attention, whether it be a matter that has come
19 because of a communication from the State
20 Department of Education or from dealing with a
21 parent or dealing with an employee or dealing
22 with a student.

23 Q: And knowing that the senior cabinet are the
24 people that a superintendent works with most
25 frequently, would you describe that you're



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1 interactions with the senior cabinet as a
2 superintendent might be, let's say, of a more
3 casual nature than how you would interact with
4 other people you -- of the staff, parents,
5 students, board members? Would it be
6 different?

7 A: Yes, it would, I would say. And it may be
8 because we're there in that office or in that
9 building all the time. So, you know, you would
10 do it more casually than if a parent were to
11 come in and you were having to deal with a
12 parent. It's probably more casual than if you
13 were dealing with a principal because the
14 principals are out in their buildings and your
15 communication with them on a day-to-day basis
16 is more by e-mail or telephone.
17 But the other people on your staff, especially
18 the senior staff, that is get out of your desk,
19 go -- I mean out of your chair, go to their
20 office and sit down and talk to them. Or they
21 come in and sit down and talk with you. And
22 the superintendent should have an open-door
23 policy, so especially for those people who need
24 to see you and let them come in.

25 Q: And would it be normal for a senior cabinet



1 staff member in a school district to address
2 any concerns of a superintendent if they have
3 them?

4 A: Sure, it would be.

5 Q: I want to kind of transition to asking you a
6 little more about the specifics of Chester
7 County School District. Actually, let me
8 backtrack even one step further. I don't think
9 we've established on the record yet. How long
10 have you known Dr. Slayman?

11 A: I knew of Dr. Slayman before 2013 because she
12 applied for a superintendent's position where
13 some of the people that I knew directly had
14 applied for the same position. I first met
15 Dr. Slayman in, I believe it was 2013 -- spring
16 of 2013. So for five years, a little over five
17 years.

18 Q: And how would you describe your interactions
19 with her during those about five years?

20 A: During the time that we worked there, which
21 would have been about two years, I think,
22 during the spring of '13 and then -- '13-'14
23 school year and then '14-'15 school year would
24 have been the time. And I don't know that I've
25 actually seen her since 2015. So it's been



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1 over three years since we've actually seen each
2 other. She was very professional, or I saw her
3 to be very professional. She knew what she
4 wanted to do as a superintendent and what she
5 needed to have other people do in order to move
6 the school district along. But in all my
7 relationships with her were very professional,
8 given me the information that we need, tell us
9 what she would like for us to do as a
10 consulting group. And then we'd go to it and
11 come back and sit down and meet with her and
12 have an interaction about what we had found out
13 or what we had discovered or what we would
14 recommend.

15 Q: And with regard to the consulting time frame,
16 I think you've already testified about two
17 years you worked with the Chester County School
18 District in a consultant capacity?

19 A: Correct.

20 Q: And what type of work were you performing as a
21 consultant?

22 A: The first thing that we went to do was to work
23 with the reading instruction. And the State
24 Department had pulled back from the money
25 because we were still in a down economy -- and,



1 of course, we still are in a down economy in
2 terms of education funding. But they had asked
3 us to you come in and take a look at how they
4 were training their reading specialists,
5 reading teachers, classroom teachers, and
6 reading. I have a group of people that does
7 it. I cannot do it and I -- I don't know how
8 to do that. But I have people that can do it.
9 So we have those people come in or to come in
10 and meet with Dr. Slayman.
11 First thing that she asked us to go though was
12 to see if we could look at her budget and find
13 money in the budget to help pay for that. And
14 I had worked with those school districts to
15 do -- to analyze budgets and to determine which
16 moneys with certain pots of money coming from
17 either the State or the feds that you could use
18 to do the reading instruction, to do the
19 coaching and training. And we found some pots
20 of money that she was currently using for some
21 other things. She redirected that money. And
22 that was the first couple of things that we
23 did.
24 Then from that point on, we did -- she asked us
25 to take a look at the organization of the

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1 district, because she was a brand new
2 superintendent. I can't remember when she came
3 or how long she had been there. Had not been
4 very long. But she said how about taking a
5 look at the way this district's organized.
6 That district is very similar in size to the
7 one that I would -- that I operated. I think
8 we had 5,000, a little over 5,000 students, and
9 they had somewhere in the neighborhood of 5- or
10 6,000 students or 4- to 6-. So it wasn't a
11 whole lot of difference in terms of the size.
12 So she asked us to take a look at the
13 organization, organizational structure that had
14 been there, the organizational structure as she
15 had proposed, which meant we had to talk with
16 some people, some people in the district office
17 to find out exactly what they did. We could
18 see it on paper, we needed to know a little bit
19 more about what each person did, talk with
20 those folks. Came back with our
21 recommendations to her on how we would
22 organization the district staff and how they
23 should be set up. She had already done a good
24 bit of that, because she had already hired some
25 of those people and put them in place. Then we

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1 were asked to do a salary study. Then we were
2 asked to assist with -- in the initial phases
3 of a facility study, because that's something
4 that we had expertise in. And we completed
5 that. Then I -- we did some training in the
6 high school, so data analysis. That was
7 Mr. Moore's specialty. He did some data
8 analysis of some work in the high schools. And
9 I think those are things that we did for them.

10 Q: And you referenced discussions with people in
11 the schools and in the district office during
12 those different time frames where you've served
13 as consultant. What did you observe with
14 regard to Dr. Slayman's interactions with
15 anyone that she was interacting with when you
16 were personally present?

17 A: Professional, as any -- as a superintendent
18 should be. And working and communicating
19 directly with her district office staff as well
20 principals and the board and principals. And
21 that, again, she, on occasion, would be there
22 to just observe us when we were meeting with
23 those people. Sometimes she would participate
24 in our discussions with whether it be the
25 reading coaches or the reading instructors or



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1 the principals, but always there to support.
2 And I'll tell you as a superintendent, one of
3 the things that helps establish a good
4 relationship with your staff is that if you
5 attend functions like that, even if you're only
6 there because when a superintendent is present,
7 people sense the importance of that issue or
8 that meeting. If superintendents, especially
9 in districts the size of the one that she was
10 in or the one that I was in, if you're not
11 there, then people don't -- sometimes don't
12 take it -- you know, she doesn't really care or
13 he doesn't really care -- don't know how
14 important this is to the superintendent,
15 therefore I don't know if it's important to me
16 as a participant.

17 Q: When you were consulting with Chester County
18 School District while Dr. Slayman was
19 superintendent, do you feel that she was trying
20 her best to be a good superintendent?

21 A: I do.

22 Q: And did you perceive any type of hostile work
23 environment between her and her senior cabinet?

24 A: No.

25 Q: And how would you describe your personal



1 observations of the interactions you have with
2 the senior cabinet about how they felt in their
3 job?

4 A: We interacted with the district staff, but
5 there were about six or -- five or six of those
6 people that we worked with on a continuous
7 basis over the two-year period. They treated
8 us very professionally. They took their jobs
9 seriously. They wanted to see the school
10 district improve. They felt like that there
11 had -- there was a lot -- were a lot of things
12 that needed to be done in that district, and
13 they wanted to move as fast as they possibly
14 could, whether it was related to finance or
15 personnel or curriculum and instruction. So
16 they took their job seriously, and they treated
17 us professionally, and interaction was very
18 cordial.

19 Q: And will you -- how would you describe the
20 morale that you received in the district office
21 when you were there?

22 A: I thought the morale was good. I thought the
23 environment in that district office was very
24 good, because you could sense it. And as long
25 as I've been around in education, I can sense



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1 going into a district office or a school
2 building, you could sense it by your
3 interactions with other people. While they may
4 not say anything that, hey, I really like it
5 here; or, hey, I hate it here; you can sense
6 that by after you've worked with them for a
7 while. And I did not see anything that would
8 have told me that the morale in that district
9 office or that district was bad.

10 Q: And to follow up on that thread, just a few
11 kind of specific types of questions. Did you
12 ever see Dr. Slayman yell at anybody?

13 A: No.

14 Q: Did you ever see Dr. Slayman threaten anybody?

15 A: No.

16 Q: Did you ever see Dr. Slayman act in any manner
17 that you felt was hostile towards employees?

18 A: No.

19 Q: And when you were serving in the consultant
20 role, did you have a specific area within the
21 district office that you worked?

22 A: Yes. They had us in a conference room that was
23 outside the superintendent's administrative
24 assistant's office, so we were very close to
25 the middle of the building, the middle of the



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1 cluster where Dr. Slayman's office was. It was
2 just kind of around the corner, as I remember.
3 Again, it's been over three years since I've
4 been there but. But I know -- I think their
5 office was sitting here, and our little
6 workroom was here (indicating). And so you
7 came out going into their office kind of that
8 way (indicating). And I know you can't hear
9 that on the tape, but that was at a good
10 description of it on the table.

11 Q: And fair to say that where you were working
12 from when you were in the district office was
13 within earshot of Dr. Slayman's office?

14 A: Yes.

15 Q: And considering also that proximity, based on
16 your observations when you were physically
17 there, was Dr. Slayman's door typically open
18 when she wasn't meeting with someone in a
19 private setting?

20 A: Yes. As I remember it, that was the case.

21 Q: And how long were you working intermittently
22 out of the conference room time frame-wise?

23 A: In terms of what day? Like, we might have been
24 there 15 or 20 times over the course of two
25 years. And when we were there, we were



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1 typically there for an entire day. And roughly
2 by that, I mean from 8:00 o'clock 'til 2:00 or
3 3:00 o'clock in the afternoon. Sometimes
4 longer.

5 Q: Would that average over maybe about once or
6 twice a month?

7 A: Yeah. About a couple of times a month. Just
8 depending on what the need was.

9 Q: Fair to say it wasn't localized to one day that
10 you were in the district office. You were
11 there on several occasions?

12 A: Yes.

13 Q: Did members of the senior staff ever act as if
14 they were afraid of Dr. Slayman when you were
15 around?

16 A: No.

17 Q: And what would you describe Dr. Slayman's
18 demeanor when you saw her interacting with
19 other employees within the district office?

20 A: Again, it was professional. Whatever the issue
21 was they were dealing with and then they were
22 dealing with it directly, there would be
23 communication between Dr. Slayman and the
24 individual that when she would talk, they would
25 talk. She would ask questions. They would



1 respond to questions. Then they would
2 cordially depart and move on to their next
3 assignment.

4 Q: And knowing that no superintendent's perfect,
5 but would you say that Dr. Slayman comported
6 herself with what you would expect a
7 superintendent to be when you observed her?

8 A: That's correct.

9 Q: Did you observe Dr. Slayman seek opinions and
10 advice voice from people outside of just her
11 own decision making?

12 A: Yes.

13 Q: And how often do you think she sought advice
14 from the senior cabinet when you saw?

15 A: Well, when we were there, if we were having a
16 meeting with senior cabinet or anybody that she
17 had brought in to deal with us while we were
18 there, then she would ask us or tell us what
19 the situation was. She would ask our opinion.
20 She would ask for a opinion of her staff
21 related to whatever area they were responsible
22 for. So it wasn't like she was just there
23 telling us what to do or telling them. She was
24 seeking advice from them as well as us.

25 Q: And with your 23 years as a superintendent, 16



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1 years as district leader and consulting work,
2 would you say it is normal for a superintendent
3 to be active in the community in which they're
4 leading?

5 A: Correct. Better be.

6 Q: Well, describe that for us.

7 A: Well, you work for the community. You work at
8 the pleasure of a school board who's elected by
9 the community. You're gonna embrace -- and the
10 community is ultimately gon' get whatever it
11 wants, so to you need to know what the pulse of
12 the community is as you deal with any issue in
13 your school district. So you need to seek as
14 much advice and input by listening as much as
15 you can, but also you have to be a convener of
16 some of those activities such as hearings or
17 times when you bring public in or when you
18 become members of civic clubs or any kind of
19 group in the community, so that you can tell
20 them what you're doing as well as listen to
21 them about what might be the interest of the
22 community.

23 Q: And would it be outside of the norm for a
24 superintendent to go to breakfast with
25 community members?



1 A: No.

2 Q: I want to track back to the salary study. Tell
3 us a little bit more about what that was kind
4 of in this time frame of, I believe, 2015 when
5 it's occurring.

6 A: Yeah. We were asked by the Olde English
7 Consortium to take a look at -- do a survey of
8 salaries in that entire consortium. And,
9 again, teachers had not received a raise and
10 still haven't received a raise in about ten
11 years. And people -- the other people over in
12 that area had not received a raise, teacher
13 assistants, secretaries, and those kind of
14 folks. And they had had a salary study that
15 had been completed somewhere around 2007, '08
16 just before the financial crisis had hit.
17 But the consortium asked us to do a survey, so
18 we agreed to do the survey for the entire
19 consortium, which would have been all the
20 districts in the Olde English Consortium, about
21 eight or nine districts. The York districts,
22 Chesterfield, Chester, Cherokee, those are the
23 districts, plus whoever else is over there. So
24 we agreed to do it for them, give them the
25 survey back. And we had a situation where two



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1 of the other districts -- two districts asked
2 us to go beyond the survey and to actually
3 complete salary studies, which would be the to
4 do the analysis after the survey was done and
5 do the analysis and make the comparisons and
6 show exactly sale by sale on a salary schedule
7 of how they compared to the other districts as
8 well as the average and then to take a look at
9 jobs and job description and make sure that the
10 job descriptions were matching the salary
11 classifications and the salaries. So we did
12 that over a period of time, a long period of
13 time. Don't remember how long it was, but it
14 was a long period of time.

15 Q: And how would you describe Dr. Slayman's
16 approach to the staff with regard to that
17 study? Was she trying to get additional salary
18 for her team?

19 A: Yes. That's the point of the salary study,
20 that -- to make the comparisons and then see
21 where you stand in relationship with other
22 folks in similar positions and other school
23 districts, neighboring school districts. So
24 she was wanting to see if the salaries in
25 Chester County compared favorably with salaries



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1 in the other districts in the -- in that area.
2 And possibly -- because we have done salary
3 studies all over the state, so we were
4 providing a little bit of input to how -- as to
5 how these compared to others. But she was
6 trying to get a good gauge on how they stood in
7 relationship to the salaries to entice people
8 to come to work there.

9 Q: When you were performing the salary studies,
10 was there any concern about the finance
11 department within the district, the Chester
12 County School District?

13 A: Any concern from the finance department?

14 Q: Right. Or any of your own concern?

15 A: Well, we were working getting most of our
16 financial information from the finance
17 department. Sometimes we felt like that we
18 were not getting the information in a timely
19 manner. I know in one situation, Joe Moore,
20 who actually did the salary study indicated to
21 me that he was actually given the wrong salary
22 schedule from the finance department, and he
23 did the study based on that salary schedule
24 from the school district. And when he went to
25 meet with everybody -- and I was not at the



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1 meeting when he met with the senior staff and
2 the finance department and Dr. Slayman. They
3 realized that he'd used the wrong schedule for
4 Chester County, which meant that he had to go
5 back in and put the regular schedule or the new
6 schedule. And I met on occasion with the
7 finance -- with Ms. Stroud, and we generally
8 were just mostly getting the information from
9 her. That's basically what we were trying to
10 get.

11 Q: And during your interactions with Ms. Stroud,
12 did she ever express any concern about
13 Dr. Slayman?

14 A: No.

15 Q: Based on your time and as a successful
16 superintendent and -- with -- in the education
17 field, if there was a hostile work environment,
18 do you think you would have detected it?

19 A: I do.

20 Q: And did you detect any such hostile work
21 environment?

22 A: No. Not at all.

23 Q: Did you ever hear Dr. Slayman make any negative
24 remarks about the sheriff's department in
25 Chester?



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1 A: No.

2 Q: Was there discussion about financial
3 restructuring part of the salary study?

4 A: Yes. I know we talked about it. I don't know
5 if it was part of the salary study, but I know
6 it was discussed.

7 Q: And as a superintendent, fair to say that
8 you're charged -- superintendent's charged with
9 placing the right people in the right
10 leadership roles; is that accurate?

11 A: That's correct.

12 Q: And would it be a superintendent's
13 responsibility to give their leaders feedback
14 to try to improve their performance?

15 A: Yes.

16 Q: Would you say that as your time, you know,
17 through these many years in leadership, do
18 people react when they get negative feedback?
19 Have they reacted in adverse ways?

20 A: Yes.

21 Q: During the professional relationship that
22 you've had with Dr. Slayman since, give or
23 take, five years, have you ever heard her
24 mislead anybody, as far as you know?

25 A: No.



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1 Q: When you served as a superintendent for 23
2 years, how would you describe your expectations
3 and how a senior cabinet should or shouldn't
4 communicate directly with the school board?

5 A: The only person that should be communicating
6 with the school board in an official capacity
7 would be the superintendent. I would not
8 expect anybody else that worked for me, whether
9 it be a teacher, a teacher assistant, bus
10 driver, or a senior cabinet member to speak to
11 the school board about any official matter
12 unless they came before the board and presented
13 a report or made a complaint directly to the
14 school board in an official open session.

15 Q: Have you ever read what's kind of been
16 published that's called the Bagley report?

17 A: When ever it came out, I read it. But I have
18 not looked at it since.

19 Q: And when you read it, based on what you
20 observed at the Chester County School District,
21 what was your reaction to the material?

22 A: I didn't see any of this is what I've seen.
23 But I did not see the things that were -- a lot
24 of the things that were in there. I, again,
25 specifically I don't remember all that was in



1 there, but I don't remember -- that was not a
2 characterization of the school district nor
3 Dr. Slayman as I would have written it.

4 Q: Is there anything else that you feel is
5 important for Ms. Pike to know as she hears
6 this disciplinary hearing that you want her to
7 know about?

8 A: No. Again, coming back to that last question,
9 when we -- when I -- my partner, Mr. Moore, and
10 I saw that report, we were just shocked at what
11 was in the report, and we both said that if it
12 was going on, it sure didn't happen while we
13 were there.

14 Q: Thank you. And Mr. Winburn may have questions
15 for you as well as Ms. Pike. And I may have
16 follow-up.

17 **MR. LITTLEFIELD - CROSS-EXAMINATION BY MR. WINBURN:**

18 Q: Okay. Thank you. Mr. Littlefield, my name's
19 Scott Winburn. I'm a lawyer for the
20 Department. And I think you and I spoke on the
21 phone a couple of time?

22 A: Yeah.

23 Q: Yeah. Not about this case.

24 A: No. It was different.

25 Q: Right. And good to meet you. Sorry it's under



1 these circumstances, but I appreciate your
2 willingness to be here and help us with this
3 process. A couple of question I had for you,
4 and I'll try to -- I guess I may be going in
5 reverse a little bit. But the Bagley report,
6 do you know Ms. Betty Bagley?

7 A: I do.

8 Q: Can you speak to what you know about her
9 qualifications as an educator?

10 A: She was a superintendent -- well, she had to be
11 a teacher at some point, but I know that she
12 was a superintendent in Bamberg. I knew her as
13 superintendent then. Then she moved to
14 Anderson -- was in one of the Anderson
15 districts for quite a number of years, which is
16 upstate about an hour from us. So the Upstate
17 superintendents sometimes would get together.
18 And, of course, statewide, superintendents
19 would get together. So I know she was a
20 superintendent and she was a good
21 superintendent.

22 Q: Okay.

23 A: And they did good things.

24 Q: Okay. And I think you testified earlier that
25 you worked on a continuous basis for about a



1 two-year period but later testified that that
2 meant you were really on a contract for two
3 years working on these projects for two years;
4 is that fair to say?

5 A: That's fair.

6 Q: Okay. And you -- based on your estimate, I
7 wrote down 15 to 20 times that you, you know --
8 even though you may have been doing work
9 outside the district, you were actually on site
10 15 to 20 times during that period of time?

11 A: Yeah.

12 Q: Okay.

13 A: Yes.

14 Q: Question about direct communication or
15 communication with the board, for subordinates
16 to communicate with the board, I understand
17 your testimony was that in an official
18 capacity, not to do that; correct?

19 A: Correct.

20 Q: Now, does that mean -- in your mind, does that
21 mean no communication even on matters that are
22 not really in an official capacity or even --
23 not even particularly substantive matters?
24 What do you think official capacity means, in
25 your mind?



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1 A: Official capacity means that I would expect
2 that the individual -- and you would expect
3 this especially in a small community like they
4 have in Chester or where I was -- that board
5 members are gonna be friends, that are
6 educators, that are teachers. They're bus
7 drivers that are senior-level cabinet people.
8 And then they would have their social functions
9 when that I could talk. If the board member
10 asked a question, a general question about
11 education, I would expect them to answer that.
12 If they ask a specific question that the
13 individual in their discretion -- knew that
14 they should not be talking to the board about,
15 if they are making any complaint about any
16 other person, if they're talking about any
17 policy decisions that would be of a specific
18 nature that might be coming before the board,
19 I would not expect them to talk to that person.

20 Q: Okay.

21 A: But I would expect them to be cordial and
22 answer the questions best they could. But,
23 again, they have that responsibility back to
24 the superintendent first.

25 Q: Right.



1 A: And then if they have an issue with the
2 superintendent's decision, to go to the full
3 board to address whatever the situation is.

4 Q: And it's a legal term, I'm sure you're
5 familiar. But in my mind, you're saying, no,
6 there should not be any ex parte communications
7 about matters that may come before the board?
8 And those could be personnel matters; those
9 could be specific policy matters?

10 A: Correct.

11 Q: Okay. And since you've read the Bagley report,
12 I may read from it just very briefly. But
13 you've been a superintendent for 23 years?

14 A: Correct.

15 Q: Yeah. And you have last served as
16 superintendent in Spartanburg?

17 A: Spartanburg 1.

18 Q: Spartanburg 1. Okay. Based on your experience
19 as superintendent, can you think of any
20 circumstance where it would be appropriate for
21 a superintendent who have -- to have told a
22 subordinate, quote, I will cut your throat out
23 if you ever speak to the board again? Can you
24 imagine any circumstance where that would be
25 appropriate conduct as a superintendent?



1 A: No.

2 Q: Or, I will crucify you; or, if I go down,
3 you're going down with me, those types of
4 comments, you wouldn't expect to come from a
5 superintendent?

6 A: No, not at all.

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

8 **HEARING OFFICER:** I don't have any questions.

9 **MS. POLVI:** Just brief follow-up.

10 **MR. LITTLEFIELD - REDIRECT EXAMINATION BY MS. POLVI:**

11 Q: I want to put in context with regard to your
12 time as a superintendent. My understanding is
13 you had some recognitions for that time. Just
14 for -- of the record, what recognitions did you
15 have while you were superintendent?

16 A: Well, I was the SCASA Superintendent of the
17 Year toward the end of my career. Almost every
18 organization that gave awards at some point --
19 when you think about 23 years, somebody's gon'
20 come and award these things. And so I received
21 almost every one of those awards from the
22 guidance and from the athletic association and
23 from reading groups, those kind of --
24 superintendent of the year. I got those kind
25 of awards over the years.



1 Q: And during the time frame that you served as a
2 consultant, I want to put in context, with
3 regard to the Bagley report, essentially the
4 people who are interviewed are individuals
5 identified as potentially complainants, let's
6 but it that way. Would you as a consultant
7 expect that to get a true picture of what was
8 going on, you would need to interview other
9 people than those who were complaining?

10 A: To get a true picture? All right. Full
11 picture, yes.

12 Q: And would that mean people who are beyond those
13 just identified by the complainers?

14 A: Yes. I would do that.

15 Q: And that maybe extensive inquiry into the
16 accusations would require some more than just
17 maybe one follow-up with the person being
18 accused?

19 A: I would think so.

20 Q: And Mr. Winburn asked you about some
21 statements. I'm gon' crucify you, cut your
22 throat, those kind of statements in terms of
23 things. I guess I'd ask, in terms of times
24 that you've been superintendent, have words
25 that you've said been taken out of context from



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1 (Off the record.)

2 **HEARING OFFICER:** Okay. After everybody has looked
3 at their schedule, it is our plan that we are
4 going to continue this case on Thursday,
5 November the 1st. It will go all day for all
6 the witnesses that Ms. Polvi has scheduled.
7 And then we will plan on finishing up, if
8 there's any left, on Friday, November the 2nd,
9 and it this will be in the afternoon after a
10 morning hearing that's already been scheduled
11 here at SCDE. So does anybody have -- and we
12 will begin at 9:00 a.m. on the 1st,
13 November the 1st.

14 Anybody have anything else that needs to go on
15 the record.

16 (No audible response.)

17 **HEARING OFFICER:** All right. And we are gonna
18 adjourn, and I see you all then on the 1st.

19 (There being nothing further, the administrative
20 hearing concluded at 3:30 p.m.)

21 DAY FOUR - THURSDAY, NOVEMBER 1, 2018

22 **REVEREND BILL STRINGFELLOW**, having been duly sworn,
23 testifies as follows:

24 **HEARING OFFICER:** Okay. Ms. Polvi, your witness.

25 **REVEREND STRINGFELLOW - DIRECT EXAMINATION BY MS.**



1 **POLVI:**

2 Q: You comfortable?

3 A: Uh-huh.

4 Q: Okay. We'll start off with some background
5 questions just to give Ms. Pike an opportunity
6 to know some things about you.

7 A: Uh-huh.

8 Q: What is your profession?

9 A: Preacher.

10 Q: And how long have you been a preacher?

11 A: 55 years.

12 Q: And which church or churches do you preach at?

13 A: At the moment, I'm at Boozer Chapel in
14 Newberry, South Carolina.

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

16 A: Know Dr. Slayman by interviewing her for
17 superintendent of Chester County School
18 District when I first met her.

19 Q: And how long have you resided in Chester
20 County?

21 A: All my life. 76 years.

22 Q: And how familiar are you with the community?
23 Are you frequently involved?

24 A: I'm involved in the community. Of course, I'm
25 the President of the to NAACP, Chester Branch.



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1 So I practically know everybody in Chester
2 County.

3 Q: And did you have relatives that work for
4 Chester County School District?

5 A: Yes. Half of Chester County School District is
6 kin to me.

7 Q: And how many relatives have worked for the
8 District?

9 A: My wife for 40 years, my daughter 30 years.
10 Got a nephew, 23; one niece, 24, I believe.
11 Got another niece been there 25, another nephew
12 been there 20. I got some cousins. Altogether
13 probably 150 years of education.

14 Q: And have you also had relatives go through the
15 school district from being educated?

16 A: Yes.

17 Q: About how many?

18 A: Hundreds, I can't ... More recently, my
19 granddaughter finished Chester County School
20 District, who is an assistant solicitor at
21 Lexington County.

22 Q: And how long were you serving on the Chester
23 County School Board?

24 A: Between my whole tenure, been about 28 years.

25 Q: And can you explain to Ms. Pike kind of the



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1 structure of the school board, how it typically
2 operates?

3 A: It has a seven-board member. And it operates
4 and as far as election, one is given every two
5 years. And the structure they will -- we come
6 together and the board will make decisions and
7 pass them on to the superintendent. And along
8 with the superintendent collaborate with the
9 board.

10 **HEARING OFFICER:** I'm sorry. Did you say seven
11 members?

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

13 **HEARING OFFICER:** Okay. And I'm sorry. Did you say
14 that -- let me make sure I heard you -- that
15 they're elected every two years?

16 **THE WITNESS:** They're elected every four years, but
17 every two years, they would ---

18 **HEARING OFFICER:** Right.

19 **THE WITNESS:** --- two or three would be re-elected.

20 **HEARING OFFICER:** Okay. Thank you.

21 **THE WITNESS:** You're welcome.

22 **HEARING OFFICER:** I'm sorry.

23 Q: And with regard to the hiring of Dr. Slayman,
24 can you tell us about her interview process?

25 A: Her interview process was -- I had to think --



1 but we went through Dr. Slayman and probably
2 five other candidates.

3 Q: And were you aware of a gentleman named Jeff
4 Gardner applying for the superintendent
5 position?

6 A: Yes. He was interviewed at the same time.

7 Q: And did he do an interview to the board?

8 A: Yes.

9 Q: Was your -- well, what was your understanding
10 of his desire? Did he want to be the
11 superintendent?

12 A: He wanted to be the superintendent, but he
13 wasn't qualified to become a superintendent.

14 Q: When you were on the board, were Charles King,
15 Jeff Gardner, Brooke Clinton, Anna Stroud, and
16 Shawn Williams serving in Dr. Slayman's senior
17 cabinet?

18 A: Yes.

19 Q: And can you describe for us, at the board
20 meetings were there times that the senior
21 cabinet spoke to the board?

22 A: Yes.

23 Q: And did you ever see Dr. Slayman discourage
24 those individuals from speaking with the board?

25 A: No, ma'am. Not at all.



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1 Q: And when you say not at all, can you explain to
2 us kind of what your impression of -- or what
3 you observed her interaction with her senior
4 cabinet in your observations?

5 A: My observation from what I've seen, they were
6 very pleasant. She was very pleasant with
7 them. And there was no hesitant of anything
8 they wanted to ask. At least they asked me,
9 anyway, all the time. We had no problem with
10 that with no communication.

11 Q: So would it be fair to say that the senior
12 cabinet felt comfortable to speak with you?

13 A: Yes, ma'am.

14 Q: What knowledge do you have of anyone filing a
15 hostile work environment related to
16 Dr. Slayman?

17 A: The gentlemen -- the two gentlemen you just
18 called and Shawn and Anna was part of that
19 group that said the environment was hostile to
20 them. And the real problem, if I can say this,
21 that Dr. Slayman came in as a superintendent
22 that had leadership skills, and she demanded
23 that you do your job. And they had a bunch of
24 people that wasn't doing their job.

25 Q: What concerns, if any, did you have about this



1 hostile work environment complaint?

2 A: When I looked at it, it wasn't a hostile
3 environment complaint. It was something
4 that -- I seen in a video that really didn't
5 want to do what they were asked to do or told
6 to do or assigned to do. And they were
7 hesitant to do that. And if I can say that
8 part of it, I don't know about the ladies, but
9 the men was fearful -- it happened all the time
10 when black, white, purple, green, whatever you
11 call it sometime is afraid of strong powerful
12 womens.

13 Q: Did you ever hear Dr. Slayman speak to her
14 senior cabinet in a manner that you thought was
15 inappropriate?

16 A: No, ma'am.

17 Q: And did you ever see Dr. Slayman yell at her
18 senior cabinet?

19 A: No, ma'am.

20 Q: As a life-long resident of Chester County with,
21 you know, relatives and friends in the school,
22 do you believe that if a hostile work
23 environment was occurring, you would have
24 known?

25 A: Yes, indeed.



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1 Q: Prior to the grievance being filed, had you
2 heard of anyone complaining about poor
3 treatment from Dr. Slayman?

4 A: No, ma'am.

5 Q: During the years that Dr. Slayman was
6 superintendent, did you feel she had the
7 support from the majority of employees?

8 A: Yes.

9 Q: And during the years that Dr. Slayman was
10 superintendent, did you feel she had the
11 support of the majority of the community?

12 A: Yes, she did.

13 Q: And are there any other reasons that you think
14 the senior cabinet made these allegations of a
15 hostile work environment against Dr. Slayman?

16 A: One, Dr. King wanted to be superintendent, and
17 I think he conspired with one of the board
18 members that that was gon' take place. The
19 board member conspired with him that that would
20 take to get rid of Dr. Slayman.

21 Q: Did you have any personal interactions with any
22 of the senior cabinet that would have struck
23 you as something that was gonna lead to some
24 kind of complaint against Dr. Slayman?

25 A: No, ma'am.



1 **MR. WINBURN:** Objection. Calls for speculation.

2 **HEARING OFFICER:** Overruled.

3 Q: And I think I've already asked this, but I just
4 want to make sure we've covered it. Did any of
5 the senior staff mention to you that they were
6 working in a hostile work environment?

7 A: No, ma'am.

8 Q: And about how frequently did you personally
9 interact with the senior cabinet?

10 A: Almost every day when I was on the board for
11 some reason I out in the building or in the
12 working area where they was at.

13 Q: Did any of the senior cabinet ever appear to
14 you when you were physically looking at them
15 that they had any kind of emotional issues
16 going on?

17 A: No, ma'am.

18 Q: And did any of the senior staff ever give you
19 any indication that they were having health
20 issues because of any treatment from
21 Dr. Slayman?

22 A: No, ma'am.

23 Q: Did any of the senior staff appear to be afraid
24 or intimidated in any kind of manner?

25 A: No.



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1 Q: And when you mentioned that you saw the senior
2 cabinet almost every day, did anyone ever leave
3 Dr. Slayman's office in tears or upset when you
4 were around?

5 A: No. I haven't seen that.

6 Q: Did you ever hear Dr. Slayman make any
7 threatening remarks to anyone?

8 A: No, ma'am.

9 Q: I have some water. We have a jug over there.
10 Do you need some?

11 A: I'm fine right at the moment.

12 Q: With regard to the filing of this grievance,
13 when did you first become aware of it?

14 A: I think when the paper was published in the
15 Chester News and Reporter.

16 Q: And what was your reaction?

17 A: I was astounded. I couldn't believe what I was
18 reading in the paper. I recognized it wasn't
19 the truth, but I just -- it was amazing to know
20 that this happened and I would not have known
21 it when I picked up on it. I guess I have a
22 sense for knowing things and seeing things, and
23 I would have sensed it from working with
24 Dr. Slayman if this had took place.

25 Q: How would you describe -- and be as descriptive



1 as you can -- when you observed Dr. Slayman
2 interacting with her senior cabinet prior to
3 this grievance, kind of close in time? How
4 would you describe their interactions that you
5 observed?

6 A: They were acting normal or the same. They
7 didn't seem to be changing any behavior. I
8 guess they could have been doing it behind the
9 scene.

10 Q: And one of the things that -- that's kind of
11 come out through some other testimony was about
12 that Dr. Slayman kind of went to bat for some
13 of these people who are grievants. Did you --
14 were you ever present when Dr. Slayman defended
15 Anna Stroud, Shawn Williams, Charles King, Jeff
16 Gardner, Brooke Clinton in terms of their
17 performance in their job?

18 A: No. I was not present during that.

19 Q: Have you ever heard Dr. Slayman make any
20 comments that you felt were insensitive?

21 A: No, ma'am.

22 Q: There's been some question about time off. Did
23 anyone ever bring any question to you about
24 whether they were given time off to go on
25 vacation, things of that sort?



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1 A: No. Not at all. And let me add, if a person
2 had the vacation time or whatever they were
3 requesting and they requested in a proper
4 manner, they would be able to grant it to them.

5 Q: And did Dr. Rick Hughes have any conversations
6 with you about his opinion about Dr. Slayman?

7 A: No. No, ma'am.

8 Q: And did Mrs. Denise Lawson ever have any
9 conversations with you about her opinion of
10 Dr. Slayman?

11 A: No, ma'am.

12 Q: And I think you already mentioned that Charles
13 King and Jeff Gardner both had sought to be
14 superintendent of Chester County School
15 District. Do you know of any reasons why Anna
16 Stroud, Shawn Williams, or Brooke Clinton would
17 want to file this grievance with regard to
18 Dr. Slayman?

19 A: One, Ms. Stroud was -- didn't actually do
20 her -- perform her job in a proper manner, and
21 she was not qualified to do it.

22 Q: And were you on the board at the time that Anna
23 Stroud was instructed to obtain the necessary
24 educational requirements for her job?

25 A: Yes.



1 Q: And was that instruction given to her?

2 A: Yes, ma'am.

3 Q: And was Ms. Stroud's pay frozen as a result?

4 A: Yes, indeed.

5 Q: When you visited the district office, what did
6 you observe with regard to Dr. Slayman's door?
7 Was it open, closed, what frequency?

8 A: It was open.

9 Q: During your interactions with Dr. Slayman, did
10 he ever try to coerce or make someone try to
11 falsify any information, that you observed?

12 A: No, ma'am.

13 Q: So some of the grievance from pretty much each
14 grievant relates to their opinions about
15 private security in the school district. Can
16 you describe kind of what your understanding is
17 of why the private security was put in place in
18 the school rather than the school resource
19 officers from the sheriff's office?

20 A: One, when newly elected Sheriff Underwood was
21 elected, he came with a hostile -- with him
22 that he -- I'm like -- I'm taking over. The
23 school belongs to me. The way he disrespected
24 the superintendent and thought the
25 superintendent was not in charge of the school.



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1 And from that, the county council cut the
2 funding of the resource officers. And so
3 therefore the school cannot absorb all that
4 cost by itself.

5 Q: And around when did that kind of county council
6 vote about the funding occur?

7 A: It happened every year when during their budget
8 process. And during this particular budget
9 process, they -- it was changed -- I think the
10 old county manager was gone now and had lost
11 his job to a new county manager. So that --
12 during that period, the new county manager, I
13 guess, didn't have in it in his budget. There
14 was not enough money for it, and so they
15 decided not to do it.

16 Q: And as a result of that shift in budget, was
17 the result that a school resource officer was
18 not available for every school in Chester
19 County School District?

20 A: That's correct.

21 Q: And you've mentioned -- and I'm paraphrasing --
22 I think in your testimony I think said you felt
23 Sheriff Underwood had disrespected the
24 superintendent. Can you describe for us what
25 prompted you to develop that opinion?



1 A: Well one, when his attitude when the
2 superintendent wanted to speak with him, he
3 would always make issues he could not see the
4 superintendent or he wouldn't come to see the
5 superintendent. But then he started putting
6 allegations out in the community through -- I'm
7 not sure he was doing it -- a young lady named
8 Mel Carter was posting stuff on Facebook and
9 stuff about the sheriff was not being treated
10 fair or the sheriff was not getting the
11 opportunity to put the resource officer -- but
12 this was half true. It was not the real truth.

13 Q: And is it accurate to say that some of the
14 contentiousness seemed to originate from the
15 sheriff's office?

16 A: Yes.

17 MR. WINBURN: Objection. Calls for speculation.

18 HEARING OFFICER: Mr. Stringfellow, do you know that
19 for a fact?

20 THE WITNESS: Yes, ma'am.

21 HEARING OFFICER: Okay. If you know that for a
22 fact, then you can certainly testify to it.

23 THE WITNESS: Yes, ma'am, I know that for a fact.

24 Q: And your daughter, is it accurate that your
25 daughter served as the mayor of Chester for a



1 significant amount of time?

2 A: Yes, ma'am.

3 Q: And about how long was she mayor?

4 A: She was mayor for 12 years. And before then,
5 she was City Councilman for eight years.

6 Q: And during that time, were you also very
7 involved in the community?

8 A: Yes.

9 Q: And how would you describe the sheriff's office
10 relationship with other kind of leaders in the
11 community such as, like, City police, fire
12 department, county council, school district.

13 A: He had built a hostile environment between all
14 the agencies, because he felt that he -- all of
15 the agents was under his control rather than
16 ~~acting through the sheriff and this is my~~
17 department and running the sheriff's
18 department. He was so aggressive until he --
19 the City department wouldn't used to interact
20 with them, and so they had -- as a matter of
21 fact, he put them out of the police department.
22 They had to relocate.

23 Q: And there's been some allegations in the
24 grievance that the security -- private security
25 was put in place by Dr. Slayman. Is that



1 accurate or it -- would that be that it would
2 be the board's decision?

3 A: It was the board's decision. She may recommend
4 it, but it was the board's decision.

5 Q: And you -- were you aware of Dr. Hughes'
6 reaction to the hiring of the private firm for
7 the schools?

8 A: Yes. Him and -- I wasn't on the board at the
9 time, but him and Underwood conspired to --
10 because he was working for the county, the
11 doctor for the stockade.

12 **HEARING OFFICER:** I'm sorry. They conspired to do
13 what?

14 **THE WITNESS:** They were conspired to work together.
15 They were working together.

16 **HEARING OFFICER:** Okay.

17 Q: Accurate to say that -- and just I think we've
18 established this -- but that you worked with
19 Denise Lawson?

20 A: Uh-huh.

21 Q: I'm sorry?

22 A: Yes, ma'am.

23 Q: Thank you. And that you worked with
24 Dr. Hughes?

25 A: I didn't work with him. I run against him and



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1 defeated him.

2 Q: And that in -- and during the time frame that
3 you were on the board, let's -- I don't think
4 we've covered that yet. What were the years
5 that you were on the school board?

6 A: I defeated Dr. Hughes in 2011, I believe --
7 2010.

8 Q: During your time on the school board, how well
9 or how would you describe Dr. Slayman's
10 interactions with the board?

11 A: It was very good. Very positive. Because I
12 went to the national -- state convention board
13 meeting with Dr. Slayman, and she was always
14 very pleasant to be around.

15 Q: During your times that you were present with
16 ~~Dr. Slayman and other school board members,~~ did
17 she seem to treat the school board members in
18 an equal manner?

19 A: Yes.

20 Q: And was there a time where Dr. Slayman started
21 to present personnel information in executive
22 sessions rather than the personnel director,
23 Shawn Williams, during that presentation?

24 A: In -- state that again now?

25 Q: Was there a time in the board meetings that



1 Dr. Slayman started to present personnel
2 information in executive session rather than
3 her HR director, Shawn Williams?

4 A: Not to my knowledge. If it was something that
5 she directly wanted to say to the board and not
6 Ms. Williams.

7 Q: During your time on the school board, was there
8 ever a time period that the senior cabinet did
9 not speak with you?

10 A: No, ma'am.

11 Q: So it's pretty continuous that the senior
12 cabinet could communicate with you as a board
13 member?

14 A: Yes, ma'am.

15 Q: Do you have any knowledge as to who was
16 publicizing things related to Dr. Slayman and
17 the grievance filed against her to the media?

18 A: I'm not aware of who was doing it, but it was
19 getting to the media through some means. I'm
20 not sure.

21 Q: What impact did Dr. Slayman have on the Chester
22 County School District?

23 A: She had a great impact on the Chester County
24 School District. She set it up where the
25 school district was progressing and moving



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1 forward over in the 21st Century.

2 Q: And is someone that's involved in the community
3 and is a board member, you know, this is a
4 disciplinary hearing with regard to
5 Dr. Slayman's license. Is there anything that
6 you think Ms. Pike needs to know that we
7 haven't talked about?

8 A: I don't think -- I just think that she -- that
9 some -- I'm not sure who started it, but
10 someone in those five or maybe somebody else
11 was trying to discredit Dr. Slayman from doing
12 her job as superintendent. And one of the
13 board members, as the acting superintendent for
14 the Dr. Slayman, came -- was originally from
15 Chester. And he conspired with some of the
16 ~~board members to send this letter to the State~~
17 Department.

18 Q: And the interim superintendent you're referring
19 to, is that Dr. Callicutt?

20 A: Yes.

21 Q: And if a superintendent is issuing a complaint
22 about a former superintendent, should the
23 school board be notified?

24 A: Yes.

25 Q: Prior to this grievance -- allegations being



1 made, how would you describe the morale in the
2 district office when you've visited the office?

3 A: It was real good. I think maybe at one of the
4 highest points that it's ever been, 'cause I
5 worked with many superintendents in Chester
6 County so ...

7 Q: And on that thread, I won't hold you to an
8 exact. Because you have been in the community
9 for a long time, about how many superintendents
10 have you observed -- an estimate's fine --
11 coming through the school district?

12 A: Before I got involved in the school district,
13 there -- we had a, at that time, a public
14 superintendent who had to run to be elected.
15 And that was Henry Steed [ph]. And he stayed
16 superintendent about 25, 30 years. And after
17 him, I seen then the superintendent was
18 appointed -- elected -- appointed by the board
19 and about seven or eight different
20 superintendents.

21 Q: And of those appointed by the board, how would
22 you compare Dr. Slayman to the others?

23 A: She was one of the best superintendents that I
24 ever worked for.

25 Q: And thank you for taking the time to be here



1 today. I've concluded the majority of the
2 questions I want to ask. I might have
3 follow-up. Mr. Winburn has the opportunity to
4 ask you questions, as well as Ms. Pike.

5 A: Okay.

6 REVEREND STRINGFELLOW - CROSS-EXAMINATION BY MR.
7 WINBURN:

8 Q: Mr. Stringfellow, my name's Scott Winburn. I'm
9 a lawyer for the South Carolina Department of
10 Education. I appreciate you being here today.
11 I'm just gonna ask you a couple questions. As
12 Ms. Polvi mentioned, this is a disciplinary
13 hearing. And we, again, appreciate you being
14 here to get the facts. I wanted to know what
15 you did to prepare for your testimony today?
16 Did you talk to Ms. Polvi about your testimony?

17 A: No.

18 Q: Okay.

19 A: I met her the first time a few minutes ago.

20 Q: First time you met?

21 A: Uh-huh.

22 Q: Okay. Good. Now, you mentioned eight
23 superintendents -- well, Mr. Steed or it may
24 have been Dr. Steed -- was superintendent for
25 25 or 30 years?



- 1 A: Uh-huh.
- 2 Q: And then when the -- so about how long ago did
3 the superintendent become appointed or elected
4 by the board? How many years ago would that
5 have been approximately.
- 6 A: Approximately 30 years.
- 7 Q: Okay. You -- but eight different
8 superintendents is what you remember?
- 9 A: Approximately, yeah. It may be more.
- 10 Q: Right. Okay. How would you describe
11 service -- are you on the school board now?
- 12 A: No.
- 13 Q: How would you describe generally service on a
14 school board, a local school board? Is it
15 generally harmonious, or is it contentious?
- 16 A: It's usually harmonious. As a matter of fact,
17 I'm running for school board again.
- 18 Q: Can't get enough of it?
- 19 A: No. And I would often tell people the reason
20 I'm running again is because I need to bring
21 some direction back to the school board.
- 22 Q: I understand.
- 23 A: And the worst school board I ever sat on -- and
24 I sat on with many -- has been former
25 educators. They come back and they want to fix

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1 some things, some things that their side wasn't
2 like this side or something going on all the
3 time.

4 Q: Right. Okay. That's fair enough. Now, I
5 wanted to ask you about timing. You know,
6 there's been some discussion about the
7 grievance that was filed. And I'll just submit
8 to you the date on the letter -- and it's a
9 letter to Ms. Lawson from these five
10 individuals, which is Dr. King, Mr. Gardner,
11 Shawn Williams -- Ms. Williams, Ms. Stroud, and
12 Ms. Clinton. You're familiar with this?

13 A: Yes, sir.

14 Q: Okay. And the date on that letter is
15 September 8th, 2015. Now, before that, it's
16 our understanding that Ms. Betty Bagley had a
17 report -- or developed a report, and the date
18 on it is September 3rd, so five days before
19 this grievance?

20 A: Uh-huh.

21 Q: Is that your understanding?

22 A: Yes, sir.

23 Q: Can you tell Ms. Pike what your understanding
24 was of the charge or the task given to
25 Ms. Bagley? What was she supposed to do, and



1 how fast was she supposed to do it?

2 A: Again, I wasn't on the board at that time, but
3 from outside and observing it. I'm not sure
4 what the limit she was supposed to had on it,
5 but after reading her report, that was the
6 worst report I read from, a person that was
7 suppose to been in her category.

8 Q: I'm sorry?

9 A: It was a poorest report I ever seen from a
10 person that was supposed to been in her
11 category that was able to write reports. It
12 was a bad ---

13 Q: You've never seen a report like this? But in
14 terms of the timing, do you have any
15 understanding of what -- when she was brought
16 on, what prompted her to be called in to
17 provide this report?

18 A: If my memory serves me correctly, I think
19 Dr. Slayman had been out of state to some
20 conference. I'm not sure what it was. And
21 from that -- after coming back, this what led
22 up to this report.

23 Q: Okay.

24 A: Because they said some racial remarks made
25 that ---



1 Q: Okay. But is it your understanding that
2 Ms. Bagley interviewed with these same folks
3 that filed the letter; is that your
4 understanding?

5 A: Yes, sir, uh-huh.

6 Q: All right. And, again, her report preceded the
7 grievance letter by five days, according to the
8 dates?

9 A: Right.

10 Q: Okay. Now, can you tell us whether you
11 worked -- you did not work in the office with
12 the senior staff?

13 A: No, sir.

14 Q: Okay. And you weren't privy to all of the
15 meetings with -- that the senior staff would
16 have had with Dr. Slayman?

17 A: No, sir.

18 Q: Okay. I think you testified it was your
19 thought that there were a lot of people --
20 strike that.

21 Do you know how much interaction there was
22 between the sheriff's office and Dr. Slayman
23 once Defender was brought on as the -- to serve
24 in a security role? Do you know how much
25 interaction they had with one another after



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1 that point?

2 A: Dr. Slayman and the sheriff?

3 Q: Yes, sir.

4 A: Not much. Maybe not at all 'cause the sheriff
5 was, let's say, got very hostile for some
6 reason.

7 Q: And you believe that is the sheriff's -- it's
8 the fault of the sheriff in that?

9 A: Yes, indeed.

10 Q: All right. You also testified that
11 Ms. Stroud's pay was frozen during the time
12 when you were serving on the board?

13 A: Yes, sir.

14 Q: She was not fired?

15 A: No, sir.

16 Q: All right. And do you know whether she
17 received good audits, satisfactory reports on
18 her bookkeeping?

19 A: Yes, sir.

20 Q: She did receive that?

21 A: Yes, sir.

22 Q: But it is it is accurate that she did not have
23 the credential -- the accounting background and
24 the board wanted her to pursue those
25 credentials?



1 A: Yes, sir.

2 Q: Okay. Now, so you defeated Dr. Hughes in 2011;

3 is that about right?

4 A: Yes, sir.

5 Q: Did he come back on the board?

6 A: Yes. He come back and defeated me.

7 Q: And then y'all -- okay. So all right. And

8 did -- so those were contentious races. Do you

9 remember what the votes were -- in, let's say

10 in 2011 when you defeated him, do you know what

11 the breakdown was?

12 A: Breakdown, I think I had 5,600 or something

13 like that.

14 Q: Was this an at-large seat or ---

15 A: At-large seat.

16 Q: Okay. Do you remember what his would have been

17 when you defeated his ---

18 A: His was 5,000 and something.

19 Q: We're talking about a few votes here?

20 A: Yeah. I beat him by a hundred, 200 votes.

21 Q: Yeah. And then when he defeated you, do you

22 remember what the breakdown -- I don't want to

23 bring up bad memories. I just ...

24 So he came back and he ran again, as I

25 understand it. So he defeated you. Let's say



1 the margin was pretty close. And then he no
2 longer -- when did he roll off the board; do
3 you remember? Or is he still on the board?

4 A: No. He off the board. He left probably six
5 months, if the last that long. I'm not
6 sure ---

7 Q: Okay.

8 A: --- the time of it. But when he defeated me,
9 he was not living in Chester; he was living in
10 North Carolina.

11 Q: Right, right. I did know that. So he was
12 serving on the board at some point, and he was
13 holding that seat, but he had actually moved to
14 North Carolina?

15 A: That's right.

16 Q: And I'll just say, I believe his -- for the
17 record, I think his wife is sick. I don't know
18 if you know that.

19 A: Yes, sir.

20 Q: Okay. I don't know if that has anything to do
21 with the move or not, but I've communicated
22 with him. Okay. And so you are serving again
23 and -- or you were seeking a seat on the at
24 large -- as an at-large board member?

25 A: Yes.



1 Q: All right. Who's -- you're in opposition?

2 A: Yes. Dr. Anne Collins and former school board
3 member Jim Stroman.

4 Q: Okay. All right. So, well, two out of
5 those -- I -- forgive my ignorance. Will two
6 of the top two vote-getters become the at-large
7 members?

8 A: Just one.

9 Q: Just one of the three?

10 A: Uh-huh.

11 Q: So will you have to win over 50 percent of the
12 vote or there'll be a run off?

13 A: No. One vote would ---

14 Q: Whoever wins the ---

15 A: Yes.

16 Q: --- most votes?

17 A: It's nonpartisan.

18 Q: Okay. Cool. All right. Well, good luck with
19 that. You probably got to go campaign after
20 this?

21 A: Yes, sir.

22 Q: Well, you look ready. I wish you well. I have
23 run for office and, man, my wife tells me if I
24 ever do it again, it'll be with my second wife.
25 So I didn't have the guts to run for school



1 board, and so I admire you for that.

2 All right. I think that's all I have. Thank
3 you.

4 A: You're welcome.

5 **REVEREND STRINGFELLOW - EXAMINATION BY THE HEARING**
6 **OFFICER:**

7 **HEARING OFFICER:** Mr. Stringfellow, I just have a
8 couple of questions for you. All right. So
9 you came on the school board in 2011?

10 A: It -- I believe it was 2011. I may have been
11 2010. But frank, January 2011. Yes.

12 **HEARING OFFICER:** January of 2011. And then you
13 served for two years and then Dr. ---

14 A: No. I served for -- it may have been earlier
15 than that. But I served for four years,
16 because I was on the board for two years
17 under -- with Dr. Slayman.

18 **HEARING OFFICER:** Okay. And let's see. If I'm --
19 memory serves me -- and y'all correct me if I'm
20 wrong -- Dr. Slayman came on in 2012?

21 A: '12, that's right.

22 **HEARING OFFICER:** And so you were there until 2014?

23 A: That's right.

24 **HEARING OFFICER:** So you were for certain there from
25 January of 2011 to -- through 2014?



1 A: Uh-huh.

2 **HEARING OFFICER:** Okay. Okay.

3 May I see that exhibit, please? Thank you.

4 You talked for a little bit about Dr. Charles

5 King, and you talked about Mr. Jeff Gardner.

6 Let's talk about Ms. Shawn Williams for a
7 moment.

8 A: Uh-huh.

9 **HEARING OFFICER:** Were you aware of issues involving
10 Ms. Williams' employment? Was she doing her
11 job? Were there issues there? I'm trying to
12 figure out why she would sign a grievance.

13 A: I really don't know. But Ms. Williams was
14 given every opportunity -- from very small
15 school district when she came to Chester in the
16 capacity she was in, would get every
17 opportunity to do her job. But I'm not sure
18 why she would sign an agreement -- a statement
19 like this.

20 **HEARING OFFICER:** But as far as you know, she was
21 doing a good job?

22 A: A average job. Let's put it that way. There
23 was some things she might have not been doing.
24 She should have been doing she wasn't doing.

25 **HEARING OFFICER:** Can you give me an example?



1 A: Well, this is my opinion now. She wasn't doing
2 a lot of recruiting that I thought, teachers
3 she should have been recruiting.

4 **HEARING OFFICER:** Okay. Was there anything else
5 that you noticed that she should have been
6 doing that she wasn't?

7 A: She had a tendency of being out quite a bit,
8 for some reason or another.

9 **HEARING OFFICER:** Okay. We've talked a little bit
10 about Ms. Stroud. What about Ms. Brooke
11 Clinton? Was she doing her job?

12 A: I think she was. And then I think she was
13 overdoing her job. Some things that she was
14 sharing with Dr. Slayman -- was sharing with
15 her that should have been press released stuff
16 she was sharing with the community prior to it
17 coming out in the press release.

18 And maybe if I say this, one of those
19 hindsight -- I think is Dr. Slayman had a
20 chance to do it again, she wouldn't have hired
21 her.

22 **HEARING OFFICER:** So I'm sorry. Let me see if I
23 understood what you said. So Ms. Clinton was
24 releasing things to the press before she should
25 have been releasing them to the press?



1 A: Yes, uh-huh.

2 **HEARING OFFICER:** Okay. When you were interacting
3 with the board members on a daily basis, were
4 you coming into their office suite to interact
5 with them?

6 A: Yes, ma'am.

7 **HEARING OFFICER:** And on an average, how long would
8 you stay in their office suite?

9 A: Maybe -- sometimes five, ten minutes.
10 Depending on what I wanted to talk to them
11 about or say to them about or ask them about
12 something that's going on in the district.

13 **HEARING OFFICER:** Okay. Would you say that on an
14 average you stayed in there about five or ten
15 minutes?

16 A: Yes.

17 **HEARING OFFICER:** Ms. Stringfellow, were you chairman
18 of the board ---

19 A: No.

20 **HEARING OFFICER:** --- at any point?

21 A: No, ma'am.

22 **HEARING OFFICER:** Okay. So at the time that you
23 rotated off the board in 2014, were things
24 going well for Dr. Slayman at that point?

25 A: Yes, ma'am. Very well.



1 **HEARING OFFICER:** Was it generally -- to your
2 knowledge, was the board pleased with her as a
3 whole?

4 A: Yes, ma'am.

5 **HEARING OFFICER:** And Dr. Hughes was not on the
6 board at that particular point?

7 A: No, ma'am. Yes.

8 **HEARING OFFICER:** Dr. Hughes came back on in 2014
9 when you rotated off; right?

10 A: '15, I believe, when he came back and -- 'cause
11 he didn't swear in 'til January '15.

12 **HEARING OFFICER:** Okay, okay. So from 2012 to 2014,
13 Dr. Hughes was not on the board?

14 A: That's right.

15 **HEARING OFFICER:** Was 2011 the first time that you
16 were voted on to the school board?

17 A: No, ma'am.

18 **HEARING OFFICER:** Oh, you were on before that?

19 A: Yes, ma'am.

20 **HEARING OFFICER:** How many times?

21 A: Totally, I served approximately 28 years. And
22 so it's been a long time.

23 **HEARING OFFICER:** Over a period -- quite a few
24 years?

25 A: Yes, ma'am.



1 **HEARING OFFICER:** And in your experience on board,
2 have you ever had anything like this to happen
3 before?

4 A: No. Once when I first came back on the board,
5 now, we had a superintendent that Dr. Hughes
6 was responsible for him being the
7 superintendent 'cause he was parted of that
8 group that elected him. He should have never
9 been elected superintendent. I'm not going
10 into details why he -- but and when we get
11 back, we find that this man -- as a matter of
12 fact, he came to the State Department and
13 worked, because they say Chester County was
14 crazy for letting him go. And he didn't last
15 here three months before they shipped him back.
16 They found out that we wasn't so crazy.

17 **HEARING OFFICER:** Okay. Was Dr. Hughes on the board
18 prior to this as well over the years?

19 A: Yes, ma'am. He had served one full -- he
20 served one term at the District 6 seat. And
21 then he run for a at-large seat. And me and
22 him -- and that's when I defeated him.

23 **HEARING OFFICER:** So were y'all jockeying back and
24 forth over the years for that at-large seat?

25 A: No, ma'am. It wasn't until we made it



1 nonpartisan that he decided to run for ...

2 **HEARING OFFICER:** Okay. So he doesn't have the
3 lengthy history on the board then that you do?

4 A: No, ma'am.

5 **HEARING OFFICER:** Would that be accurate?

6 A: Yes, ma'am.

7 **HEARING OFFICER:** Okay. So was he on the board
8 prior to 2011?

9 A: Yes, ma'am.

10 **HEARING OFFICER:** He was?

11 A: Uh-huh.

12 **HEARING OFFICER:** As a District 6 person?

13 A: Yes, ma'am.

14 **HEARING OFFICER:** So was he serving with you in 2011
15 on the board?

16 A: No.

17 **HEARING OFFICER:** Okay. So he must have rotated off
18 of ---

19 A: He rotated, yes, ma'am.

20 **HEARING OFFICER:** Somewhere ---

21 A: In between.

22 **HEARING OFFICER:** --- in between. Okay. I got it.
23 Did y'all ever serve on the board together?

24 A: No.

25 **HEARING OFFICER:** Okay. You mentioned that your



1 daughter was the mayor?

2 A: Yes, ma'am.

3 **HEARING OFFICER:** Was your daughter the mayor during
4 this period of time from 2012 to 2014?

5 A: Yes.

6 **HEARING OFFICER:** And when -- let's see where I can
7 find his name -- the new sheriff was elected,
8 did she also have problems with the new
9 sheriff?

10 A: She had just went off when he got sworn in.

11 **HEARING OFFICER:** I see. Okay. If this is within
12 your knowledge, then answer it. And if it's
13 not, then please feel free to tell me it's not.

14 A: Okay.

15 **HEARING OFFICER:** Did -- what was it that the new
16 sheriff had to gain by making Dr. Slayman look
17 bad?

18 A: One -- I'm not sure what he had to gain. One,
19 he wanted to be in control of every agency in
20 Chester County. He felt they come under his
21 umbrella. He just -- got a feeling about
22 the -- out of the control who was actually in
23 charge of that, he was on the court, and he
24 decided he backed away a few weeks ago, months
25 ago. He feels that everything was under his



1 control and he wanted control of Chester
2 County. And one that -- when he was in school,
3 he didn't finish high school in Chester County,
4 so he had to come to Fairfield County and
5 finish school. And so I think he -- that was
6 a bitter pill in his mouth ever since.

7 **HEARING OFFICER:** Oh, no. Did he flunk out of
8 school in Chester?

9 A: No, he didn't flunk out. They put him out.

10 **HEARING OFFICER:** Oh. So once again, if this is
11 within your knowledge, then please answer it.
12 If it's not, then please tell me that. By
13 controlling the school district, do you mean
14 controlling the SROs?

15 A: No. His thing was he think -- he thought the
16 superintendent should answer to him. That's
17 right. That's what he was thinking. And he's
18 not that far off that base now, that he still
19 think the superintendent should be answering to
20 him. Not the superintendent actually in
21 request anything from him and that they work
22 together. In his job -- for some reason or
23 other, he didn't want to do that. And one of
24 ladies that was prompting him to -- calling the
25 shots, she's passed on now. And so he done



1 kind of cooled down because he don't have that
2 outlet no more.

3 **HEARING OFFICER:** Do you have personal knowledge of
4 whether the current superintendent of Chester
5 County has had any issues with the sheriff?

6 A: She breathing some now with him ...

7 **HEARING OFFICER:** Can you just share with me what
8 the nature of those issues are?

9 A: One, that he claim that he don't have access to
10 do, like, training that he wants to do. The
11 board granted him that. I'm not sure what else
12 he want from them. And he then -- he wanted
13 the board to actually spend money to put more
14 resource officers in every school, but he want
15 the school district actually foot that bill.

16 **HEARING OFFICER:** So is there still private security
17 in the schools, or is it now SROs?

18 A: It's still private security.

19 **HEARING OFFICER:** It's still private security. So
20 then he ---

21 A: Maybe one of the school has a -- one -- I mean,
22 from his sheriff department just recently was
23 hired.

24 **HEARING OFFICER:** So he wants to control the private
25 security people?



1 A: He want all that under his umbrella. But he
2 not so much to control them. If he -- if
3 they're there, he want them to be under
4 umbrella where he can give the orders and tell
5 what to do from day-to-day operation.

6 **HEARING OFFICER:** Have you had conversations about
7 the school with this sheriff?

8 A: Yes, ma'am.

9 **HEARING OFFICER:** Okay. Was that while you were a
10 board member?

11 A: While I was aboard member and -- well, no.
12 Because see, when he got elected, I was gone
13 off the board. But I was -- not being a board
14 member, I had conversation with him.

15 **HEARING OFFICER:** Okay.

16 A: Of course, we don't talk much because I'm not
17 quite his cup of tea.

18 **HEARING OFFICER:** I don't think I have any further
19 questions.

20 Do either of you have any follow-up to what
21 I've asked?

22 **MS. POLVI:** Briefly.

23 **REVEREND STRINGFELLOW - REDIRECT EXAMINATION BY MS.**

24 **POLVI:**

25 Q: And I think it was clear on the record but just



1 to clarify, you're -- you were on the Chester
2 County School Board up until the end of
3 December 2014?

4 A: Yes.

5 Q: And then Dr. Hughes started his tenure when
6 it -- after he was elected, that would have
7 been the beginning of January 2015?

8 A: That's right.

9 Q: So you were still on the school board as of,
10 give or take, about eight months prior to this
11 grievance?

12 A: Yes.

13 Q: And note about with your daughter, time frame
14 that she was serving as mayor, she was also a
15 teacher in ---

16 A: Yes.

17 Q: --- Chester County School District?

18 A: That's correct.

19 Q: So those were contemporaneous with each other?

20 A: Yes, ma'am.

21 Q: In total, about how many years was Dr. Hughes
22 on the board?

23 A: He spent probably four and a half years, four
24 or six years, something like -- I'm not sure
25 the last time he -- he didn't stay long. I'm



1 not sure if he stayed a year or two years from
2 '15 to when he got elected.

3 Q: And I think there was some kind of implication,
4 if not testimony, from one of the grievants
5 about implying that the discontent between
6 Dr. Slayman and the sheriff was somehow race
7 related? Do you believe that to be the case?

8 A: No.

9 Q: And for the record, you're the same race as the
10 sheriff, Sheriff Underwood?

11 A: Yes, I am.

12 Q: Well, let's go ahead and put it on the record.
13 I don't know if I'd asked you that, but we're
14 in the same room. What is your race?

15 A: Black.

16 Q: Okay. And then just for the purposes of the
17 transcript, because it's in -- it's just in
18 writing later. Let's see. I think those are
19 all my follow-ups. Thank you.

20 MR. WINBURN: That's all I have.

21 HEARING OFFICER: Mr. Stringfellow, thank you.

22 (Witness excused.)

23 (Off the record.)

24 MAGGIE JAMES, having been duly sworn, testifies as
25 follows:



1 HEARING OFFICER: Okay, Ms. Polvi.

2 MS. JAMES - DIRECT EXAMINATION BY MS. POLVI:

3 Q: I'll be asking you questions first.

4 A: Oh, okay.

5 Q: So we'll start -- before we get kind of in the
6 meat and potatoes of the testimony, just get
7 some of your background.

8 A: Okay.

9 Q: What is your profession?

10 A: I'm a retired Health and Human Service
11 Specialist II with the Department of Health and
12 Human Services. Been with the State government
13 for 34 years.

14 Q: How long have you been a Chester County School
15 Board member?

16 A: I was first elected in 1993, and I served until
17 January 2007. And I was off the board for
18 three years, and I went back on in
19 January 2011.

20 Q: And to the present?

21 A: Yes, and to the present. Yes, uh-huh.

22 Q: So tell us in terms of the time frame that you
23 were on the board when Dr. Slayman was applying
24 for the job, kind of how that application
25 process went.



1 A: The application process went smoothly. She was
2 one of the top three candidates that we
3 selected to bring back for a second interview.
4 And, of course, she rated high. And she was
5 the one that we chose. And at the time, I was
6 the chairman of the board.

7 Q: And was Jeff Gardner one of the other
8 applicants for the superintendent position at
9 that time?

10 A: Yes, he was. He had applied. We didn't think
11 he had the skills or the knowledge to be
12 superintendent. But out of a courtesy, we were
13 advised by our attorney just as a courtesy to
14 interview him so that we would have that out of
15 the way.

16 Q: When you interviewed Mr. Gardner, did he appear
17 to want to position?

18 A: Yes. He thought he had the position just
19 automatically, because he was already employed
20 with the district. But that was never any of
21 the board members' intention to have him as
22 superintendent. We just did it as a courtesy.

23 Q: And what were the questions in your mind with
24 regard to Mr. Gardner to make that conclusion
25 that he should not be superintendent?



1 A: For one, he didn't have the qualifications. He
2 didn't have the certificate nor the background
3 to be superintendent.

4 Q: And under Dr. Slayman's leadership as
5 superintendent, did she promote Mr. Gardner?

6 A: Yes. He eventually got promoted to the
7 district office.

8 Q: During your time -- during, I guess, his entire
9 time that he was in a leadership administrative
10 role with Chester County School District, did
11 he struggle in that role?

12 A: Yes.

13 Q: And can you describe that?

14 A: Sometimes things -- people want positions that
15 they're really not qualified for or they can't
16 take the stress of dealing with what they
17 wanted so badly and were not able to handle.
18 And he could not handle the position. He came
19 across as being weak-minded in handling some of
20 his duties. And he didn't want to obey
21 authority and he made the comment especially he
22 was resentful of Dr. Bain because he said was
23 not gonna take orders from a woman. He didn't
24 like having to -- her being his superior.

25 Q: And Dr. Bain was the -- is the superintendent



1 now?

2 A: Yes.

3 Q: And was his supervisor at the time he made the
4 statement?

5 A: He did that while Dr. Slayman was his
6 superintendent. That's what he was telling
7 people on the outside. Be it that he was doing
8 that because he was resentful that he did not
9 get the position or that was his comeback or
10 that was his defense mode for not getting the
11 position. He said he wasn't taking no orders
12 from a woman.

13 **MR. WINBURN:** I'd like to object to that as hearsay.
14 It's in. I'd like to hear whatever Ms. James
15 has to say about all these statements. But I
16 just want to note for the record that is rank
17 hearsay. We'll continue.

18 **HEARING OFFICER:** Okay. Go ahead.

19 Q: With regard to interactions that Mr. Gardner
20 had in his capacity in an administrative role
21 in a senior cabinet ---

22 A: Uh-huh.

23 Q: --- how would you describe your observations of
24 his interactions with Dr. Slayman when you were
25 present?



1 A: I guess it was kind of short. Her -- whatever.

2 Q: Did that seem to be a mutual feeling or
3 directed from either Dr. Slayman or
4 Mr. Gardner?

5 A: Basically from him.

6 Q: And did you draw any conclusions as to what was
7 the source of that kind of short and curt
8 interaction?

9 A: Just knowing that -- like I said, that that was
10 resentment with him not being the
11 superintendent.

12 Q: So during your time on the Chester County
13 School Board, fair to say that you've been
14 actively involved in the community?

15 A: I'm very much so.

16 Q: And how long did you serve in the board chair
17 capacity?

18 A: Three years from 2011 and until 2014.

19 Q: And after you, Denise Lawson served in that
20 role?

21 A: Yes. No -- I think -- let me see. Was it
22 Denise? I think Ms. Hensley served in that
23 role.

24 Q: So it was Ms. Hensley and then Ms. Lawson?

25 A: Yes. Then it went back to her, uh-huh.



1 Q: How long have you lived in Chester County?

2 A: All of my life.

3 Q: And are you familiar with employees and the
4 people involved with the school district?

5 A: Yes.

6 Q: And what family do you have that worked with
7 the school district.

8 A: My daughter works at Chester Middle School,
9 administrative assistant.

10 Q: And when did you first meet Dr. Slayman?

11 A: When she came to be interviewed for the
12 position.

13 Q: And how would you describe Dr. Slayman's
14 performance as superintendent?

15 A: She was a great superintendent. She was really
16 forward thinking. She had a goal set for the
17 students of our district. She was well
18 received by the community. Let's see, she just
19 had everything on go. We upgraded all of the
20 technology in all of the schools. She worked
21 with the phone company to get the entire county
22 Wi-Fi'd, not only in Chester but Comporium out
23 of Rock Hill that handles Lancaster County,
24 they were -- she was able to work out an
25 agreement with them for the children that live



1 in the eastern part of Chester to be able to
2 have available Wi-Fi service. She worked out
3 that with them. And she was chosen to even go
4 to Washington to serve on a national committee
5 for education.

6 Q: And that was during the time frame that she was
7 superintendent in Chester?

8 A: Yes. That was the highlight -- one of the
9 highlights of her career when she went to
10 Washington DC to meet with the President,
11 Barack Obama, and be a part of that.

12 Q: And on kind of that same thread, I want to ask
13 about a couple of exhibits that relate to
14 Dr. Slayman's evaluations and things of that
15 sort.

16 A: Okay.

17 Q: So I've got Exhibit -- I'm going to ask you
18 first about Exhibit 7 and 5.

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

21 Q: We can skip 7 'cause 5 included -- 7 has both.

22 **HEARING OFFICER:** I'm sorry. You're going to 5?

23 **MS. POLVI:** Actually 'cause it actually has both of
24 those.

25 **HEARING OFFICER:** All right. I'm totally confused



1 here. I thought for certain ... I see that
2 there I get it. Okay. Hold on. So you're
3 going to 7?

4 **MS. POLVI:** Yes, please. Okay. Very good.

5 **Q:** So you have before you Exhibit 7. And they are
6 a series of documents that relate to the
7 evaluations given to Dr. Slayman in her
8 capacity as superintendent for the year of 2012
9 to 2013. Were you a school board member at
10 that time?

11 **A:** Yes, I was.

12 **Q:** And were these the evaluation information given
13 to Dr. Slayman?

14 **A:** It were -- it is.

15 **Q:** And it includes correspondence from you. Is
16 that, indeed, your signature?

17 **A:** Yes. That's most definitely my signature.

18 **Q:** And with regard to the information within it,
19 we don't need to read it in verbatim.

20 **A:** Okay.

21 **Q:** But can you summarize what this information is?

22 **A:** This is a letter letting her know that we've
23 done a summary of her performance and that all
24 seven board members met and had the discussion,
25 and that it was unanimous that we were pleased



1 with her performance as the superintendent of
2 the Chester County School District.

3 Q: And on the back of the exhibit is a public
4 statement. Is that public statement that's
5 given out to the community affirming that same
6 evaluation?

7 A: Yes, correct.

8 Q: Thank you.

9 A: Uh-huh.

10 Q: So the next is Exhibit 6.

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

13 A: Uh-huh.

14 Q: This Exhibit 6 is a memo from Dr. Slayman to
15 the board dated August 10th, 2014, regarding
16 her next evaluation for the calender year of
17 2013 and 2014. Is this information she
18 provided to the board?

19 A: Yes, it is.

20 Q: Do you think it accurately reflects the
21 accomplishments that she had during that school
22 year?

23 A: It does. I've seen it before, and I've had
24 copies of it. Still have copies of a lot of
25 her information.



1 HEARING OFFICER: I'm sorry. What exhibit is this?

2 MS. POLVI: This is 6.

3 HEARING OFFICER: 6. And have these already been
4 admitted?

5 MS. POLVI: Oh, well, then let me go ahead and ask
6 can 6 and 7 be admitted into evidence?

7 MR. WINBURN: Sure. No objection.

8 HEARING OFFICER: All right. So admitted.

9 (Respondent's Exhibit Numbers 6 and 7 were admitted
10 into evidence.)

11 MS. POLVI: Thank you.

12 Q: And with regard to -- again, we don't need to
13 read it in verbatim.

14 A: Uh-huh.

15 Q: But would this be the type of format that the
16 board asks of a superintendent to submit prior
17 to their evaluation?

18 A: Yes, it is.

19 Q: And did the -- goodness, gracious. I put two
20 words together there. Did the board vote with
21 regard to Dr. Slayman's evaluation for 2013,
22 2014?

23 A: Yes. Yes, we did. To accept this as -- for
24 her record, for her employment record, because
25 it was so detailed and we was -- we knew all



1 these things had happened. We knew that she
2 had accomplished all of them, and we were very
3 proud, and she was very proud as well. Uh-huh.

4 Q: Thank you.

5 A: Uh-huh.

6 Q: And the next two exhibits relate to the same
7 evaluation, Exhibits 13 and 18.

8 **(Respondent's Exhibit Numbers 13 and 18 were**
9 **introduced into the record at this time.)**

10 A: Uh-huh.

11 Q: I'm handing you 13. This is a letter dated
12 October 1st, 2014, to Dr. Slayman. And is it
13 accurate that this is the letter from the board
14 with regard to Dr. Slayman's 2013-2014
15 evaluation?

16 A: Yes, it is.

17 Q: And this content would have been authorized by
18 the whole board as a body?

19 A: Yes. Unanimous. It was unanimous.

20 Q: And what was the kind of total evaluation
21 ranking?

22 A: I don't remember exactly, but it was very high.
23 I know that, uh-huh.

24 **MS. POLVI:** I'd like to admit Exhibit 13 into
25 evidence.



1 **MR. WINBURN:** No objection. Did you admit -- I'm
2 sorry -- Number 6 already?

3 **HEARING OFFICER:** Yes. 6 and 7.

4 **MR. WINBURN:** Okay. I was thinking we were doing 5.
5 That's fine.

6 **(Respondent's Exhibit Number 13 was admitted into**
7 **evidence.)**

8 **Q:** And then Exhibit 18 follows up on the same.
9 This is the public statement.

10 **(Respondent's Exhibit Number 18 was introduced into**
11 **the record at this time.)**

12 **A:** Uh-huh.

13 **Q:** Is this the public statement issued by the
14 board with regard to Dr. Slayman's positive
15 evaluation?

16 **A:** Yes, it is.

17 **Q:** And was this authorized by the whole board?

18 **A:** It was. Entire. The entire board.

19 **MS. POLVI:** I'd like to admit Exhibit 18 into
20 evidence.

21 **HEARING OFFICER:** Any objection?

22 **MR. WINBURN:** No, ma'am. No objection.

23 **HEARING OFFICER:** So moved.

24 **(Respondent's Exhibit Number 18 was admitted into**
25 **evidence.)**



1 Q: And would this evaluation that occurred around
2 October 1st of 2014 have been Dr. Slayman's
3 last evaluation as superintendent?

4 A: Yes.

5 Q: And was Dr. Slayman's next evaluation scheduled
6 within about a week of when this grievance was
7 filed, give or take?

8 A: Give or take, it was time for her evaluation to
9 be done, and it was being stalled. The process
10 was being stalled, and we didn't know why. I
11 didn't know why.

12 Q: With regard to Exhibit 14, these are
13 Dr. Slayman's contracts to be employed as
14 superintendent with Chester County School
15 District. Were you on the board during the
16 time frame that all of these were agreed upon?

17 **(Respondent's Exhibit Number 14 was introduced into**
18 **the record at this time.)**

19 A: Yes. Yes. Yes, they are, uh-huh.

20 Q: And one of the kind of underlying questions, I
21 guess, kind of in the record is whether
22 Dr. Slayman voluntarily resigned. Is it
23 accurate to say that Dr. Slayman voluntarily
24 resigned and concluded her contract with the
25 school district?



1 A: Yes, she did.

2 Q: And did the board ever vote to take any action
3 with regard to Dr. Slayman's contract with the
4 district?

5 A: What do you mean?

6 Q: Happy to clarify. Is it fair to say that the
7 board did not vote to remove Dr. Slayman from
8 her position?

9 A: No, we did not.

10 Q: And we're gonna do some quick follow-up with
11 regard to that, but let me go ahead and ---

12 A: Okay.

13 MS. POLVI: Can we enter Exhibit 14 into the record?

14 MR. WINBURN: No objection.

15 HEARING OFFICER: So moved.

16 (Respondent's Exhibit Number 14 was admitted into
17 evidence.)

18 Q: So now I want to kind of transition a little
19 bit to ask you about the grievants, is that
20 there are five grievants who signed the
21 grievance that ultimately goes before the
22 board. Is that accurate to your recollection?

23 A: Yes. It was a last-minute thing.

24 Q: And with -- those would be Charles King, Jeff
25 Gardner, Shawn Williams, Anna Stroud, and



1 Brooke Clinton?

2 A: Yes.

3 Q: And prior to the filing of their grievance, is
4 what I want to ask you about first, is prior to
5 the board being notified, did you have any
6 inclination that there was any alleged hostile
7 work environment between Dr. Slayman and the
8 five grievants?

9 A: None whatsoever.

10 Q: And what was your observations with regard to
11 how Dr. Slayman interacted with her senior
12 cabinet prior to this grievance being filed?

13 A: It was normal for a senior cabinet reaction.
14 There was just totally nothing, no evidence of
15 anything being wrong.

16 Q: So now, let's transition to kind of this time
17 frame when the grievance first comes to
18 knowledge. And I'll kind of give you the
19 opportunity to just kind of explain the way you
20 recall. Kind of when -- how did this start, at
21 least when you first found out?

22 A: When I first found out, it was late one evening
23 around 8:30. I received a call from the board
24 chair, Denise Lawson, in reference to something
25 was going on. She was very vague, did not give



1 a lot of details, and just said that she was
2 going to place Dr. Slayman -- well, basically
3 on vacation. She said to just -- she told her
4 to use vacation time, that there was something
5 happening and it was gonna have to -- we were
6 gon' have to have a meeting, but she didn't
7 know when the meeting was going to be and she
8 would be getting back with me.

9 Q: And about how long did that call with
10 Ms. Lawson take?

11 A: I guess probably five minutes or less because
12 she wasn't detailed.

13 Q: And at that time, did she indicate that anybody
14 had made a complaint about anything?

15 A: No.

16 Q: So what happens next after that?

17 A: I think she called up -- according to my notes,
18 is she said that we would have a special-called
19 meeting, uh-huh.

20 Q: And actually we can use that to kind of follow
21 with an outline. I've got that you refer to
22 the notes as Exhibit 22?

23 MR. WINBURN: Those are the notes in front of her?

24 MS. POLVI: Yeah.

25 Q: So let's kind of run through these one by one



1 and kind of start. So I see here you've got as
2 July 1st, 2015, chair -- and the D.L. would be
3 Denise Lawson?

4 A: Yes.

5 Q: Says e-mail regarding superintendent's
6 evaluation coming up. And then the next note
7 you have here is July 27th, 2015. There's an
8 e-mail from Denise Lawson that the
9 superintendent's evaluation will be done in
10 August. And then explain the next paragraph.

11 A: I questioned her as to why it was -- the dates
12 kept changing. And that she -- I believe she
13 said people were on vacation and board members
14 were on vacation and maybe -- I guess some
15 staff members were probably on vacation or the
16 superintendent wouldn't be available. Just
17 very vague in giving us -- giving me an
18 explanation. At that time, I didn't know what
19 was going on.

20 Q: And had there already been -- kind of in this
21 July time frame, had there already been talks
22 about that the evaluation would occur during
23 July 2015?

24 A: Yes, uh-huh.

25 Q: And the -- you mention here you said the



1 conspiracy players were fully on board with a
2 plan. Who do you consider that to be?

3 A: The five people that were making -- getting
4 ready, I guess, to make a grievance and
5 Dr. Hughes, Dr. Richard Hughes. Because
6 they -- that was seemed to be her confidant in
7 all of this.

8 Q: And "her" being Denise Lawson?

9 A: Yeah, Denise Lawson. Yes.

10 Q: In the note here August 10, 2015: A normal
11 board meeting was held. There are no
12 special-called meetings by Denise Lawson
13 between August 11th, 2015, and August 24th,
14 2015. Would there normally be special-called
15 meetings?

16 A: No.

17 Q: But nothing is discussed kind of privately with
18 the board?

19 A: No, nothing.

20 Q: Okay. So and then you note here you get a call
21 on August 25th, 2015, from Denise Lawson around
22 8:30. And is that the same conversation you
23 just testified about?

24 A: Yes.

25 Q: And I see here you described it as being



1 blindsided with Denise Lawson taking that
2 action. Did you think that asking Dr. Slayman
3 to go on vacation seemed out of the norm?

4 A: Yes.

5 Q: And what made you think that?

6 A: It made me think that because, as a board
7 chair, she didn't have the authority to do that
8 without the consent of other board members.
9 She took it upon herself individually to do
10 that without consulting us and just calling us
11 and telling us about it -- and calling and
12 telling me about it. And I guess she called
13 everyone else and told them as well.

14 Q: So if these grievants, the five individuals are
15 gonna be filing a grievance, at least as of
16 this time, you were not aware of it as a board
17 member?

18 A: No.

19 Q: And you note you say at -- down at the bottom
20 of this first page, Chair Denise Lawson made
21 this decision on her own without a
22 special-called meeting and without board
23 members knowing or taking action as a body.
24 Would it be accurate to say that that should
25 have been something that the board did as a



1 body?

2 A: Yes. And the reason why I say that is because
3 that by her calling everyone on the phone, the
4 media had not been notified, so that was like
5 an illegal meeting. Any time you talk to over
6 seven people on our board -- and four people
7 are a quorum. So if you call all six of us and
8 her being the seventh, then she violated FOIA
9 doing that.

10 Q: And you note on the -- I'm looking at the top
11 of the second page. You say she even had
12 notified Dr. Slayman and told her not to
13 contact any staff or any board members before
14 she had formally took this action.

15 A: Uh-huh.

16 Q: Why was that concerning to you?

17 A: Because I didn't feel like she had the
18 authority to do that, as a board member and
19 past chair as well.

20 Q: And on the next paragraph, the next dated notes
21 here, August 27th, 2015?

22 A: Uh-huh.

23 Q: Special-called meeting with Attorney Allison
24 Hanna and Attorney Bick Halligan. And it goes
25 on to say that there's some reference being



1 made to an EEOC complaint being filed?

2 A: Uh-huh.

3 Q: Was any EEOC complaint even ever filed?

4 A: No. No civil rights either.

5 Q: And later in this paragraph you state, then
6 Dr. Richard Hughes interrupted her (Denise
7 Lawson) and said that he was the board member
8 person that had received the call and went on
9 to explain what he was told by the employee
10 that had called him?

11 **MR. WINBURN:** I'm sorry. Were are you reading that?

12 **MS. POLVI:** The last -- second to last sentence
13 under the first paragraph.

14 **MR. WINBURN:** First full paragraph?

15 **MS. POLVI:** Right.

16 **MR. WINBURN:** And just to be clear, Ms. James is
17 attending this meeting she's referring to?

18 **THE WITNESS:** Yes, I was there.

19 **MR. WINBURN:** Okay.

20 Q: And did that, indeed, occur where Dr. Hughes
21 acknowledged that he was the person who was the
22 board member essentially initiating a contact
23 about a grievance?

24 A: Yes. She was trying to explain it to us, and
25 she couldn't answer the questions that we were



1 asking. And that's when he interrupted her so
2 we wouldn't be second-guessing where it all
3 came from. He interrupted and said he was the
4 one -- she was trying to portray that she had
5 been contacted and not him. And then that's
6 when he interrupted her and said he was the
7 one. He took ownership of it, uh-huh.

8 Q: So as of August 27th, 2015, Denise Lawson and
9 Dr. Rick Hughes are the two board members who
10 have had communications with these supposed
11 grievants?

12 A: Uh-huh.

13 Q: But the other five board members, you five
14 don't know?

15 A: Had no knowledge.

16 Q: Okay. You go on in the next paragraph and say
17 that you were advised to act immediately. How
18 did you perceive that?

19 A: As a rush to judgment.

20 Q: Is this the time -- or is it a later date when
21 Betty Bagley is proposed as a investigator by
22 lawyers?

23 A: I don't think it happened at this time. They
24 went into a whole lot of hearsay, things that
25 they wanted us to do, the lawyers did. I don't



1 think it came up at this meeting. Because they
2 kept harping on the fact that the -- they could
3 go through the EEOC and civil rights division,
4 and we didn't want -- we didn't need that and
5 the district didn't need that. And I was
6 saying let's have it that way. I wanted to be
7 out in the open. But apparently they were
8 seeming as if they were trying to protect the
9 complainants.

10 Q: And these next couple of paragraphs, you
11 describe the interactions and the statements
12 made. Are those all accurate to your
13 recollection of what occurred during that
14 meeting?

15 A: Yes.

16 Q: And then I'll go ahead and let those paragraphs
17 speak for themselves in the record. But I want
18 to go ahead and translate to the next page on
19 3.

20 **MR. WINBURN:** I'm sorry. Is this in the record?

21 **MS. POLVI:** Well ---

22 **HEARING OFFICER:** I don't think it has been admitted
23 yet.

24 **MS. POLVI:** I'd like to enter Exhibit 22 into the
25 record.



1 **MR. WINBURN:** It's got tons of hearsay and -- from
2 the lawyers. And I think we might be in the
3 same position we were with the other statement
4 that we were working on the redactions. I'm
5 not sure if we've ever fully resolved that or
6 not.

7 **MS. POLVI:** This one I'm definitely gonna object to
8 having it fully complete in the record. She's
9 testified that she was present for these
10 circumstances that -- she's documenting
11 experiences she had firsthand.

12 **MR. WINBURN:** And she's here to testify too, so she
13 can testify to everything that she knows or saw
14 or did as a -- as the board member. I mean,
15 it's got -- it's just full of stuff. I
16 asked -- you know, Bick Halligan, Allison
17 Hanna ...

18 **MS. POLVI:** Well, the Betty Bagley report is full of
19 hearsay and it's in the record so this is I
20 mean ...

21 **MR. WINBURN:** Well, and every one of those witnesses
22 testified too. They testified about what they
23 observed.

24 **HEARING OFFICER:** And she's testifying with regard
25 to what she observed. I mean, as long as she



1 testifies consistent with this statement ...

2 **MR. WINBURN:** And the same problem with privilege
3 and, you know, that you get into the advice of
4 counsel when she, in my view, doesn't hold the
5 privilege. The board holds the privilege from
6 Allison Hanna and Bick Halligan.

7 **HEARING OFFICER:** Could we agree to redact the
8 portions that were attorney-client privilege
9 out of this?

10 **MS. POLVI:** I would not. I would say it needs to be
11 in the -- it's directly relevant to like how
12 this grievance develops. And it's -- these are
13 facts in the record. And if she's the current
14 board member, and this is her testimony. She's
15 able to testify to that effect.

16 **MR. WINBURN:** And Exhibit 13 is not in for the
17 same -- very same reason. You objected to
18 that, which is Dr. King's notes. You know, if
19 it aids -- can we go off the record for a
20 minute?

21 **(Off the record.)**

22 **HEARING OFFICER:** Let's start again here. All
23 right. Your objection is?

24 **MR. WINBURN:** My objection is this entire exhibit
25 contains rank hearsay. It contains privileged



1 information that Ms. James is seeking to have
2 admitted and -- Ms. -- Dr. Slayman's lawyer is
3 seeking to have admitted, which I believe could
4 obliterate the privilege that the lawyers for
5 the school board have with the board. Again,
6 it contains hearsay statements. I concede that
7 it is -- it appears to be an attempt to lay out
8 the facts as Ms. James knows them. If Madam
9 Hearing Officer is inclined to introduce this
10 and accept this as evidence, I would just -- I
11 would ask that Dr. King's notes be admitted for
12 the very same reasons that counsel for
13 Dr. Slayman is using for rationale for the
14 admittance of this.

15 **HEARING OFFICER:** Ms. Polvi, since Ms. James is
16 here, why can she not testify to all of this?

17 **MS. POLVI:** I think it's important for several
18 different reasons is that Ms. James -- that we
19 can put on the record as to this document is
20 signed by Ms. James on -- and it's an 11-page
21 statement. It's a thorough outline of a time
22 line of events that address the relevancy to
23 this disciplinary hearing, and she can testify
24 as to what day that she drafted it. Obviously,
25 it was not today that she drafted it, so it is



1 a more recent in time time line to events when
2 they occurred to the date -- we're in 2018.
3 These events occurred in 2015. So they are a
4 reflection of an earlier time frame that she
5 wrote up these events and reflect her
6 recollection as to that time.

7 And to supplement her testimony today -- also,
8 I mean, if it were not -- be entered, then we
9 need to one by one all the facts. I'm trying
10 to expedite this hearing time frame, not have
11 to review through 11 pages of the facts to have
12 her put the same information on the record. So
13 the whole point is for her to be able to
14 answer. This is her statement. This was
15 drafted by her. And then we can kind of hit on
16 the some of the key events that were relevant
17 to this disciplinary hearing. But all of this
18 time frame spans the exact, you know, period of
19 time at issue in the grievance.

20 **HEARING OFFICER:** I'm gonna deny the admission of
21 the document. And I would tell you let's take
22 her through each and every one of them to
23 present any -- I think that's the safest thing
24 to do in this circumstance.

25 **MS. POLVI:** So just to be clear on the record, do I



1 need -- I think we've covered the first half of
2 the first page time line. I think I'm gonna
3 need to start back at August 25th.

4 Q: Okay. Ms. James, though it is not a part of
5 the record, you can still, of course, look at
6 it to refresh your recollection as need be.

7 So on August 25th, 2015, can you testify as to
8 what occurred? And if it is your decision to
9 do so, you can read what your recollection was.

10 A: On August 25th, 2015, Chair Denise Lawson
11 called around 8:30 to inform me that something
12 bad was happening in the district and that it
13 involved the superintendent, Dr. Agnes Slayman.
14 She stated that she did not know exactly what
15 was going on but that Dr. Slayman was on
16 vacation and she would just tell her to take
17 personal leave and return on Friday. I asked
18 what was it about, and Chair Denise Lawson
19 stated that she did not have all the details
20 but that we would need a special-called meeting
21 on Thursday, August the 27th, 2015, and the
22 attorneys would be present to inform us on what
23 was happening.

24 I felt blindsided as a board member because as
25 Chair Denise Lawson has always felt and feels



1 that she is the only board member that can be
2 trusted with info of this magnitude and know no
3 one else could be trusted with this personal
4 info about the school district but her or
5 someone she would try to impress like
6 Dr. Richard Hughes. She told me that she was
7 doing this for the superintendent's well being.
8 She (Chair Denise Lawson) told me that she had
9 told Agnes that she was not to contact any
10 board members or school personnel. Chair
11 Denise Lawson made this decision on her own
12 without a special-called meeting and without
13 the board members knowing or taking action as
14 a board to agree with this. She even had
15 already notified Dr. Slayman and told her not
16 to contact any staff or any board members
17 before she formally took this action.

18 On August 27th, 2015, at the special-called
19 meeting where Attorney Allison Hanna and
20 Attorney William Bick Halligan note
21 Mr. Halligan had never ---

22 **MR. WINBURN:** You're getting into privilege about,
23 I'll just note my argument.

24 **THE WITNESS:** In all of my years on the board ever
25 been present before -- for any legal matters



1 involving our district.

2 **MR. WINBURN:** Still privileged, Ms. Pike.

3 **THE WITNESS:** Chair Denise Lawson explained that
4 she ---

5 **MR. WINBURN:** Ms. Polvi?

6 **HEARING OFFICER:** All right. Hold on just for a
7 second, please.

8 **MS. POLVI:** I mean, there's no privilege when she's
9 saying that he's never even been present before
10 for any legal matter.

11 **HEARING OFFICER:** No.

12 **MS. POLVI:** So he's not representing -- you know,
13 there's no advice of counsel there. And even
14 then, I mean, there's no -- there's question as
15 to whether the board was even seeking their
16 legal advice. And Ms. James was on the board
17 at that time. So that's up to her. I'm not
18 serving any kind of advisory role to Ms. James,
19 and I'm not telling her how to testify
20 whatsoever.

21 **HEARING OFFICER:** All right. That paragraph is not
22 necessarily -- there's nothing privileged in
23 that paragraph. Keep going, Ms. James.

24 **A:** Okay. Chair Denise Lawson explained that she
25 had received information about Dr. Slayman



1 being hostile and harassing some employees.
2 (She was being very vague.) And they were
3 going to file an EEOC and a civil rights
4 complaint on Dr. Slayman. Asked how many and
5 she (Denise Lawson) said she was unsure. Then
6 Dr. Richard Hughes interrupted her (Denise
7 Lawson) and said that he was the board member
8 person that had received the call and went on
9 to explain what he was being told by the
10 employee that had called him. (Note: Chair
11 Denise Lawson was trying to cover for
12 Dr. Richard Hughes as if she was the person who
13 was first contacted.) The attorneys Allison
14 Hanna ---

15 **HEARING OFFICER:** All right. Now, we were getting
16 into privilege here.

17 **THE WITNESS:** Okay.

18 **MR. WINBURN:** And I will ask. And I'll put it back
19 on the record, and we can clear this up if we
20 have to. But the special-called meeting, is
21 that in executive session? Because we've
22 already -- I don't know -- earlier in the
23 month -- last month, actually -- had a
24 discussion about all the executive session
25 meetings were inherently privileged, the



1 special-called meeting.

2 **MS. POLVI:** But, again, this is a disciplinary
3 matter. And whether or not Dr. Slayman ---

4 **MR. WINBURN:** It's the law of the case.

5 **MS. POLVI:** --- is that ultimately I'm not advising
6 how a board member should testify but that
7 ultimately if a board member has relevant
8 information to this disciplinary hearing as to
9 whether any action should be taken against
10 Dr. Slayman's, you know, license, my argument,
11 as her counsel, is that all relevant
12 information should be available to the
13 Department of Education to determine was my
14 client acting in a manner that warrants
15 disciplinary action. And you can't piecemeal
16 it without knowing the facts that are occurring
17 that are -- and, again, we're at the point
18 where it's not even clear who's complaining, as
19 to why, who. You now, where is this complaint
20 even originating from? And Maggie James is one
21 of the individuals who can testify as to where
22 is this gray area even -- where did it begin?

23 **MR. WINBURN:** I would agree -- I want the hearing
24 officer to hear as much as she possibly can.
25 Don't misunderstand. But, again, if this



1 relates to privileged information, I have a
2 real problem with it -- whether it's relevant
3 to the -- let's, say the contents of the Betty
4 Bagley report, I don't necessarily think that
5 the interworkings of the board and the
6 advisement of counsel to the board is relevant
7 in this matter, much less our responsibility as
8 in this proceeding to maintain privilege and
9 for the board members here testifying to
10 understand that they may be violating privilege
11 on behalf of the entire school board.

12 **MS. POLVI:** What ---

13 **MR. WINBURN:** What complicates matters further is
14 that you filed a lawsuit while we're trying to
15 schedule this matter that implicates the board
16 members that you're testifying about.

17 **MS. POLVI:** This lawsuit and this disciplinary
18 hearing are two -- and as you have frequently
19 noted, are two very separate venues in a very
20 separate issue. The lawsuit most definitely
21 has some interconnected facts because there's
22 extreme concern that the named defendants in
23 that lawsuit violated my client's rights. What
24 the issue ---

25 **MR. WINBURN:** And you have excluded the lawyers in



1 this case in a private hearing. That is the
2 other thing that complicates this case, and
3 here you are trying to obliterate privilege to
4 get at ---

5 **MS. POLVI:** That is entirely inaccurate. And if you
6 had let me finish with my last statement was
7 that I'm willing to stipulate that this
8 paragraph, the attorneys on forward, we can
9 skip. I mean, I would stipulate that that
10 paragraph is something where, you know, I think
11 there's question. I think we can move on to
12 the next paragraph. And then the next one
13 after that, I think we can address. But
14 again ---

15 **MR. WINBURN:** You can continue.

16 **HEARING OFFICER:** All right. So let's take out this
17 next paragraph beginning with the Attorneys
18 Allison Hanna and Bick Halligan. Let's take
19 out that paragraph. And let me see about the
20 next one. All right.

21 **MS. POLVI:** I think we can skip the first sentence.
22 The next paragraph, I think, is fine. The
23 first sentence should be skipped. And then,
24 again, Ms. James can make the determination
25 thereafter. But I would just stipulate that



1 the sentence and the next -- the last paragraph
2 should be ...

3 **HEARING OFFICER:** All right. So let's go to --
4 let's skip over that paragraph beginning the
5 Attorneys Allison Hanna and Bick Halligan.
6 We're gonna remove that. Start with, I
7 remember stating, Ms. James, and then we'll ...

8 **MS. POLVI:** Oh, one more page back.

9 A: Okay. I remember stating along with another
10 board member (Sandra Stroman) to let them file
11 the EEOC and civil rights complaint. I stated
12 if that is what they want to do and let them if
13 they were that concerned about their rights and
14 freedom were being violated, then let the chips
15 fall where they will or may. I also stated
16 that they would have to be able to prove the
17 allegations, and they would not be able to
18 present any hearsay (he-say/she-say) evidence.
19 And start there?

20 **HEARING OFFICER:** All right. Let's take it out of
21 the next paragraph. The first sentence
22 certainly needs to come out. I think you can
23 testify about Dr. Richard Hughes told the
24 employee that he would place a call from the
25 staff member representing the others that were



1 involved. And then let's leave out the part
2 about him calling Allison Hanna and what she
3 said. And then you can pick up within
4 Dr. Richard Hughes said he called the chair.
5 All right. And let's keep going with this, and
6 then we'll redact as we go.

7 A: So Dr. Richard Hughes told the employee that he
8 would place a call from the staff member
9 representing the others that were involved.

10 **HEARING OFFICER:** Okay. And then skip down to the
11 bottom.

12 A: Then Dr. Richard Hughes said he called Chair
13 Denise Lawson at this conversation ...

14 **HEARING OFFICER:** Okay. Go ahead. It's all right.

15 A: And informed her. Continue?

16 **HEARING OFFICER:** Go ahead.

17 A: At this meeting, neither Chair Denise Lawson or
18 Dr. Richard Hughes would disclose the identity
19 of the employees. They, especially Dr. Richard
20 Hughes, seemed to want to protect the
21 complainants more than the superintendent who
22 we was supposed to be concerned about or have
23 her best interests -- (Dr. Slayman's) interests
24 at heart. They, Chair Denise Lawson and
25 Dr. Richard Hughes, already seemed to have made



1 their conclusion even before the investigation.

2 They were procomplainants from day 1.

3 **HEARING OFFICER:** All right. Now hold on just a
4 second. Let's skip the next sentence and go
5 to -- go the next paragraph.

6 A: Several of us as board members (Gene Boyd,
7 Patricia Hensley, Sandra Stroman, and yours
8 truly, Maggie James) questioned why the
9 reporting person or persons had not followed
10 district policy regarding employee grievances
11 and filed that way instead of going straight to
12 a board member, Dr. Richard Hughes.
13 Dr. Richard Hughes said the person that called
14 him felt like they were comfortable talking
15 with him and speaking for the others.

16 **HEARING OFFICER:** Okay. Now, we've got a problem
17 right here.

18 **MS. POLVI:** We can just skip that paragraph. I'm
19 not gonna contest that part.

20 **HEARING OFFICER:** Okay.

21 **MS. POLVI:** But let's start with the, A date.

22 **HEARING OFFICER:** Okay. Go ahead.

23 A: A date was set for the investigation to be done
24 ASAP (Friday 8/28/15 and Monday 8/31/15).

25 **HEARING OFFICER:** Okay.



1 A: Continue?

2 **HEARING OFFICER:** Go ahead.

3 A: To expedite this matter, the next
4 special-called meeting to receive the Betty
5 Bagley report would be Thursday September 3rd,
6 2015.

7 **HEARING OFFICER:** Okay. Go ahead.

8 A: I specifically asked that the investigator talk
9 with only senior staff members, the
10 superintendent, and board secretary only and
11 that I did not want principals or any other
12 staff to be involved to prevent too much
13 unnecessary chaos in the district.

14 **HEARING OFFICER:** Okay.

15 A: On September 3rd, 2015, at the special-called
16 meeting, Betty Bagley was present with the
17 Bagley report, which was her notes.

18 **HEARING OFFICER:** Okay. Was her notes. And
19 then ---

20 A: That stated was not to be in ---

21 **HEARING OFFICER:** Wait. Whoa. Skip down to Betty
22 Bagley began by.

23 A: Betty Bagley began by introducing herself and
24 that she did not know anyone in Chester or any
25 of the complainants previously.



1 **HEARING OFFICER:** Okay.

2 A: Continue?

3 **HEARING OFFICER:** Continue.

4 A: Betty Bagley stated that one person (Jeff
5 Gardner) stated he had to seek medical
6 attention for emotional problems and be out of
7 work constantly because he was so stressed and
8 basically scared of Dr. Slayman and her
9 tirades. He stated she had prohibited him from
10 being able to do his job and work with certain
11 individuals in the community. People in the
12 community also stated to me and maybe a few
13 other board members that Jeff Gardner made the
14 comment, he did not want no woman telling him
15 what to do.

16 **MR. WINBURN:** Hearsay.

17 **MS. POLVI:** In this situation, it's a party
18 opponent. He's a grievant, so I would say it's
19 an exception to hearsay.

20 **MR. WINBURN:** I'd say she references people in the
21 community. Generally, it's just some broad
22 statement, and it is rank hearsay. She -- it's
23 already testified to earlier.

24 **HEARING OFFICER:** Did you hear him say that?

25 **THE WITNESS:** No, I did not hear him. I was just



1 told that by, like I say, people in the
2 community and some people on staff.

3 **HEARING OFFICER:** Okay. Let's -- I think that is
4 hearsay. Let's take that out. Okay. You can
5 continue, Ms. James.

6 A: Another employee, (Shawn Williams) stated that
7 she told Dr. Slayman that she could not state
8 to a person if you do not handle your job, I
9 will chop your legs off. This person (Shawn
10 Williams) also said that she felt discriminated
11 against. It seems as if she was chosen as an
12 African American to file the civil rights
13 complaint by being racially discriminated
14 against. Shawn Williams stated that she had
15 applied for a job in another district and
16 blamed Dr. Slayman for giving a bad reference,
17 which was later found to be untrue. In FOIA'd
18 e-mails by Dr. Slayman by News and Reporter
19 paper of Chester, South Carolina. When the
20 News and Reporter FOIA'd Dr. Slayman's e-mail,
21 this was disproven. Dr. Slayman had given her
22 a glowing recommendation for the job she had
23 applied for in another district. Shawn
24 Williams was being untruthful and exaggerating.
25 Continue?



1 **HEARING OFFICER:** Continue.

2 A: Another employee (Dr. Charles King) stated he
3 felt uncomfortable being around her even though
4 he (Dr. Charles King) had known and worked with
5 her previously in another district and she
6 brought him to Chester and made him the
7 associate superintendent of instruction.
8 Dr. King also relayed to the board in the
9 grievance hearing that he and he wife had gone
10 on several vacations together with Dr. Slayman
11 and her husband. If he (Dr. King) felt that
12 uncomfortable, why would he uproot himself and
13 family, move to live in Chester and be around
14 someone who would pretend later to be so afraid
15 of and intimidated by. Dr. King stated that he
16 had never seen her like this before. It is
17 questionable about what Dr. King was trying to
18 indirectly imply with this last statement.

19 Another employee, Anna Stroud, finance director
20 stated that she felt Dr. Slayman just did not
21 like her. No real reason given as to how she
22 came to this conclusion. She stated that she
23 often had to be out sick because she was being
24 harassed and that Dr. Slayman had her
25 investigated for no reason. She did not know



1 why or for what reason, which was not the
2 truth. Dr. Slayman had a financial auditor to
3 come in to check our financial status and a
4 discrepancy was found.

5 Another employee, Brooke Clinton, the public
6 information officer, accused Dr. Slayman of
7 trying to use her as a chauffeur to take her
8 (Dr. Slayman) to a doctor appointment in Rock
9 Hill one time. She stated she had small
10 children and had to rearrange her schedule
11 because of this. She would also eavesdrop on
12 Dr. Slayman's phone calls because her office
13 was directly behind the superintendent's
14 office. The board would later find out about
15 this after Dr. Slayman resigned. Brooke
16 Clinton in her position and connection as PIO
17 and others (Denise Lawson, Dr. Richard Hughes,
18 Dr. Charles King) were also the persons
19 orchestrating the high-tech lynching of
20 Dr. Slayman. Why? Everything the board would
21 discuss in executive session was exactly what
22 the News and Reporter would publish, as well as
23 all of the social pundits on Facebook and
24 release of -- over social media.

25 Everything that Dr. Slayman said and did became



1 newsworthy for the News and Reporter, The
2 Herald, The Charlotte Observer, CN2, WSOC TV 9,
3 WBTV-3, The State, and Channel 10 News in
4 Columbia. They descended upon Chester like we
5 may have been Washington D.C., New York City,
6 or Hollywood. They were harassing and defaming
7 not only Dr. Slayman, but also the four board
8 members of the school board as well. Some of
9 the other district employees began to join them
10 in their efforts on social media, newspapers,
11 et cetera. They had special pages on Facebook
12 named Jerry Mandur and County Government they
13 gave all the confidential info discussed in
14 executive session on board members that were
15 not following their plan and kept the community
16 charged up against Dr. Slayman and us. This
17 page also targeted me, Gene Boyd, Patricia
18 Hensley, Sandra Stroman, and I said myself,
19 Maggie James, on a daily -- on a daily -- and
20 I guess I left off the word "basis." Also a
21 former board member and very prominent business
22 in Chester were also targeted. I was
23 personally being attacked over social media
24 with pictures of stalking (my car and
25 whereabouts) unauthorized surveillance. This



1 meeting was the first time for Gene Boyd,
2 Patricia Hensley, Sandra Stroman, Maggie James
3 to hear the names of the complainant, even
4 though all of us already had our suspicions as
5 to who some of them were. This meeting
6 confirmed their identities and very personal
7 motives.

8 Up to this time and date, only Chair Denise
9 Lawson and Dr. Richard Hughes and Dr. Lauren
10 Fort were the only three informed board members
11 that knew what was actually -- what was
12 actually had knowledge of what was going on and
13 who the complainants were. This is -- was the
14 first time for us (the other four board
15 members) to receive the names of the
16 complainants. I already had my suspicions as
17 to who some of them were. I asked to very
18 pointedly and directly to Chair Denise Lawson
19 and Dr. Richard Hughes which one of them
20 Dr. Charles King or Jeff Gardner, did you all
21 (Denise and Dr. Hughes) promise her job to.
22 Dr. Hughes banged his hand on the table and
23 yelled at me, Maggie, we did not promise her
24 (Dr. Slayman's) job to anybody. I told him
25 (Dr. Hughes), oh, yes, you did. That is what



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1 this is all about. When I made that statement,
2 Chair Denise Lawson and Dr. Richard Hughes did
3 not respond.

4 At least five board members did not know who
5 the complainants were -- and that's a redundant
6 statement. I guess I had -- my page doing
7 this. We asked who they were. I believe that
8 gave us the names Anna Stroud, Shawn Williams,
9 Jeff Gardner, Dr. Charles King, and Brooke
10 Clinton. The attorneys implied that the
11 complainants ---

12 **HEARING OFFICER:** Whoa, whoa, whoa.

13 A: Oh, yeah. I can't read that.

14 **HEARING OFFICER:** I think you need to skip down to I
15 believe Sandra Stroman.

16 A: Okay, okay. I believe Sandra Stroman asked why
17 they had not followed the grievance policy for
18 employees according to the board policy and had
19 contacted one specific board member
20 (Dr. Richard Hughes).

21 **HEARING OFFICER:** Now, okay. Now, let's stop there.

22 A: Okay.

23 **HEARING OFFICER:** And then -- okay. You can
24 begin -- when you get down to ... Read the
25 first sentence of the next paragraph.



1 A: Okay. I had checked EEOC requirements for
2 filing a complaint and also the Civil Rights
3 Act about discrimination since this was the
4 basis for their claims.

5 **HEARING OFFICER:** Then -- let's see. Skip down to
6 the next paragraph, after I read and presented,
7 dah, dah dah ...

8 A: After I read and presented the basis for filing
9 with the EEOC and Civil Rights division, I
10 stated that that is what the complainants need
11 to do. If they feel that the board was not
12 being receptive to their demands to file it,
13 because their complaints did not meet the level
14 necessary. And we (the board) would take our
15 chances and face the consequences, that the
16 board had been sued before.

17 **HEARING OFFICER:** Okay.

18 A: Uh-huh.

19 **HEARING OFFICER:** Wait a minute. Then skip down to
20 on September the 8th, 2015?

21 A: On September 8th, 2015, another board member --
22 board meeting was scheduled. I was preparing
23 to leave my home to attend when I received a
24 telephone call from Chair Denise Lawson telling
25 me not to come, that she was opening and



1 adjourning the meeting because she had just
2 received a letter signed by the grievants
3 requesting a grieving -- grievance hearing to
4 be held in open session.

5 **HEARING OFFICER:** Okay. All right. Hold on just a
6 second here. I think you can state this next
7 beginning with Dr. Lauren Fort seemed like an
8 unwilling participant. It's up at the top of
9 page 8.

10 A: I don't have my pages numbered. Oh, okay.
11 Dr. Lauren. Okay. I see it.
12 Dr. Lauren Fort seemed like an unwilling
13 participant because he would go on to say that
14 he really liked Dr. Slayman. Dr. Fort seems to
15 be confused because he was being persuaded by
16 Chair Denise Lawson to go along with all of
17 this.

18 **HEARING OFFICER:** Okay. Stop there.

19 A: Okay.

20 **HEARING OFFICER:** And I think you can pick up with,
21 Prior to September 21st, 2015.

22 A: Okay. Prior to September 21st, 2015,
23 Dr. Slayman had never been apprized by the
24 board Chair Denise Lawson of the previous
25 special-called board meetings that were



1 basically about her and her employment with the
2 district. The board meeting agendas, also
3 prior to this date, never reflected for public
4 and media coverage that our board meetings were
5 about the superintendent. Board Chair Denise
6 Lawson kept reiterating in her concerns that
7 she was protecting Dr. Slayman's interest in
8 all of her actions, yet certain persons in
9 senior staff were receiving executive-session
10 info that they were sharing on a bogus Jerry
11 Mandur Facebook page and County Government
12 Facebook page and to community persons almost
13 immediately after we would leave these
14 meetings. Continue?

15 **HEARING OFFICER:** Continue.

16 A: A few principals (Dr. Knox, Marty Tiller, along
17 with the complainants) started recruiting
18 efforts of other principals and staff to join
19 their complaints against Dr. Slayman. They
20 would go on to rally a few employees and the
21 community to wear T-shirts to the grievance
22 hearing that stated wear red for public ed.
23 September 21st, 2015, the community and TV
24 stations were there for what was supposed to be
25 a public grievance hearing for the employees in



1 full force. On a 5-2 vote, the board agenda
2 was amended with a change for the grievance to
3 be held in executive session. While
4 transitioning to executive session, I overheard
5 Dr. Richard Hughes talking on his cell phone
6 telling someone, release it now. Right now.
7 He was yelling to someone, right now. Not
8 knowing what was happening, we all were
9 informed ---

10 **HEARING OFFICER:** Whoa, whoa.

11 A: Okay. So stop right there, yeah.

12 **HEARING OFFICER:** Okay. You can start with, all the
13 grievants were in executive session. Down at
14 the bottom of page.

15 A: All of the grievants were in the executive
16 session along with their lawyer and relayed to
17 the board all they had said in the Betty Bagley
18 report. It was at this time that we, the
19 board, found out who had made the infamous call
20 to Dr. Richard Hughes. It was Anna Stroud,
21 finance director. She stated that she had
22 known Dr. Hughes for a number of years and he
23 served as her son's baseball coach a few years
24 ago. And she had come to know him and felt
25 comfortable calling him on behalf of herself



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1 and the others.

2 **HEARING OFFICER:** Hold on just a second. Okay.
3 Finish out that paragraph.

4 A: Okay. Details of their statements in the
5 executive session is previously mentioned in my
6 comments from the Betty Bagley report. On a
7 4-3 motion, the board voted to obtain more info
8 concerning grievance. No action was taken at
9 this meeting.

10 **HEARING OFFICER:** Okay.

11 A: Continue?

12 **HEARING OFFICER:** Continue.

13 A: September 24th, 2015, while transitioning to --
14 that was redundant. That was a statement that
15 I had already given. Do I need to read it
16 again?

17 **HEARING OFFICER:** No. All right.

18 A: Okay.

19 **HEARING OFFICER:** So wait a minute. I'm confused.

20 A: I know.

21 **MS. POLVI:** I think we can jump to the several board
22 member sentence.

23 **HEARING OFFICER:** So did -- on which date was
24 Dr. Hughes talking on his phone and saying
25 release it now? Was it September 21st?



1 **THE WITNESS:** It was on the 21st. It was the 21st.

2 **HEARING OFFICER:** Okay. All right. Let's see. Was
3 there something else in here? I think under
4 September 24th, 2015, I think you could start
5 with Dr. Slayman reluctantly resigned her
6 position.

7 A: Uh-huh. Dr. Slayman reluctantly resigned her
8 position, bowing to outside/inside pressure.
9 The board chair Denise Lawson along ---

10 **HEARING OFFICER:** Whoa.

11 A: Okay. I got to hold that one.

12 **MR. WINBURN:** I'm sorry. We're on page 9?

13 **HEARING OFFICER:** Yeah. Skip that next sentence and
14 start out with, it was during this executive
15 session that Dr. Hughes ---

16 A: It was during this executive session that
17 Dr. Hughes literally begged for just one board
18 member to defect and vote with him, Denise
19 Lawson, and Dr. Fort so that it would nullify
20 Dr. Slayman's contract settlement amount. He
21 was furious and very angry that Boyd, Hensley,
22 Stroman, and James would not and did not accept
23 what he was asking. She was totally ignored.
24 It did not happen by four board members.

25 **HEARING OFFICER:** Okay. Go ahead.



1 A: Okay. September 30, 2015, in executive session
2 we interviewed candidates for interim
3 superintendent. Dr. Keith Callicutt was
4 selected. Also we discussed the grievants'
5 decision as to accept it as no merit or moot.

6 **HEARING OFFICER:** Okay. Stop right there, please.

7 A: Okay.

8 **HEARING OFFICER:** Okay. Start with, after exiting
9 the executive session we (the board) voted ---

10 A: After exiting executive session, we (board)
11 voted unanimous to deny the employment
12 grievance as moot.

13 **HEARING OFFICER:**

14 **MS. POLVI:** That last part -- the next one's not
15 attorney-client privilege in any kind of way.
16 That's public.

17 **HEARING OFFICER:** No, it's not. You can go ahead
18 and read that.

19 **MR. WINBURN:** Which one is that?

20 **HEARING OFFICER:** We're at the top of page 10.

21 **MR. WINBURN:** While I have it, all of this
22 discussion that was in executive session, I'm
23 still afraid -- and I'll just reiterate for the
24 record -- that all of that in executive session
25 is privileged. I understand Ms. Polvi's



1 position, but I just wanted to state that for
2 the record.

3 **HEARING OFFICER:** I'm gonna allow that. Let's move
4 on. And we're on December 15th -- let's see,
5 where are we? No. Wait. Up at the top of the
6 page. I'm sorry. On top of page 10.

7 A: Okay. It was at the November 16, 2015, that
8 the board by a 4-3 vote voted to release the
9 law firm of Childs and Halligan, PA, LLC. They
10 were given a certain time to complete any
11 pending cases they had at the time. Since they
12 had brought Dr. Callicutt to this board, he
13 seemed to have felt a loyalty to them and
14 appeared upset with the board for taking this
15 action.

16 December 15th, 2015: It has always been my
17 belief that when Dr. Callicutt became interim
18 superintendent that it was just a temporary
19 setup by Chair Denise Lawson and Dr. Richard
20 Hughes to put someone they already wanted in
21 place. It was and appears apparent, I
22 believe -- and that focused ---

23 **MS. POLVI:** You can say that.

24 **HEARING OFFICER:** That's not ---

25 **MS. POLVI:** That's your opinion.



1 **HEARING OFFICER:** Yeah. That's not attorney-client
2 privilege.

3 **A:** And it's true opinion. It was and appears
4 apparent, I believe, that attorneys Allison
5 Hanna and Halligan had focused on things
6 blowing over and we would be receptive to
7 hiring Dr. Charles King as interim
8 superintendent. The board would have settled
9 down from all of the negative and social media
10 coverage and that he (Callicutt) would just
11 stay long enough that it would give Chair
12 Denise Lawson and Dr. Hughes a greater chance
13 to further execute their plan for Dr. Charles
14 King to become interim
15 superintendent/superintendent very soon. Since
16 Dr. Callicutt had agreed to handle the
17 superintendent search, he raised the question
18 to the board asking if Dr. Slayman was to
19 apply, would we consider her application.
20 Based on our comments that evening,
21 Dr. Callicutt abruptly resigned effective
22 immediately or January 30, 2016, unless a
23 replacement could be found sooner if the board
24 so desired.

25 I was personally disappointed with



1 Dr. Callicutt and his actions. I knew from
2 attending and graduating from high -- Chester
3 Senior High School and the neighborhood from
4 which we both came, he had portrayed himself to
5 be a God-fearing Christian man. Dr. Callicutt
6 being the educated respected professional, a
7 teacher, a principal, and a superintendent with
8 career accomplishments to be involved at this
9 level was troubling, especially after all the
10 opportunities life had afforded him. It was
11 very disappointing that he would join in and be
12 a part of something he basically only had
13 hearsay knowledge of. Because I thought I knew
14 him, it was shocking to me to believe that he
15 would come into this situation and join in with
16 two board members (Chair Denise Lawson and
17 Dr. Richard Hughes) employees that had made
18 unsubstantiated allegations on a person that he
19 had never personally worked with or known.
20 Dr. Callicutt seemed to have aligned himself
21 with a few principals, and they had been
22 meeting and urged him on how to control the
23 board members that were not conforming and how
24 to get back at us politically. I felt that
25 Dr. Callicutt even tried to throw the four



1 board members that were not going along under
2 the bus to the district and the general public.
3 Dr. Callicutt had met with these principals,
4 and they had planned to walk out of the
5 district and were recruiting assistant
6 principals, teachers, and other staff to join
7 them if we brought back the former
8 superintendent Dr. Slayman.

9 Dr. Callicutt may have also been aware of the
10 principals recommendation being released by
11 board member Chair Denise Lawson or Dr. Richard
12 Hughes or staff members because they had access
13 to this information, and I believe they gave it
14 to the News and Reporter of Chester,
15 South Carolina.

16 January 25th, 2016: Dr. Callicutt's last
17 meeting as interim superintendent. Chair
18 Denise Lawson and Dr. Richard Hughes had
19 enlisted the help of WSOC TV, The Herald, the
20 News and Reporter, and other news media outlets
21 to be present. The community, district staff,
22 teachers and formally elected officials and
23 school board member to speak on public forums.
24 Even though they knew that allegations had been
25 considered moot, they were still trying to keep



1 the public engage -- enraged against board
2 members -- certain board members and the
3 district as a whole.

4 I would like to make it clear -- it very clear
5 that I, Maggie J. James, as a member of the
6 Chester County Board of School Trustees, did
7 not give permission, nor did I ever vote,
8 authorize, verbally, or written consent at any
9 time for Dr. Keith Callicutt to submit a letter
10 to the South Carolina Department of Education
11 that asked for Dr. Agnes Slayman's
12 superintendent's license or teaching
13 certificate be revoked on the baseless and
14 unsubstantiated allegations that were made
15 against her.

16 These statements that I have given are true to
17 the best of my ability, knowledge, and
18 remembrance of 2015 and 2016. I hope it gives
19 insight as to what I, along with other board
20 members, had to personally endure from board
21 colleagues, district staff, principals,
22 teachers, parents, community, and other elected
23 officials of Chester County.

24 Q: And from that testimony I'm gonna have some
25 additional follow-up questions. Based on the



1 information that was presented to you at the
2 time the grievance was filed ---

3 A: Uh-huh.

4 Q: --- did you, as a board member, believe that
5 Dr. Slayman had subjected any of her
6 supervisees to a hostile work environment?

7 A: No.

8 Q: And had you ever observed Dr. Slayman yell at
9 anyone?

10 A: No.

11 Q: And had you ever observed Dr. Slayman treat her
12 senior cabinet in any way less than respectful?

13 A: No.

14 Q: And had Dr. King and Mr. Gardner obtained their
15 positions as a result of Dr. Slayman hiring
16 them?

17 A: Yes.

18 Q: With regard to Shawn Williams and the HR
19 director position, during her testimony, she
20 essentially cited to one incident as a basis
21 for hostile work environment that occurred
22 about two years prior to the grievance. Did
23 Ms. Williams ever bring that to your attention?

24 A: No.

25 Q: And did she continue in her role as HR director



1 throughout the time that Dr. Slayman was
2 superintendent?

3 A: Yes, she did.

4 Q: With regard to Anna Stroud, can you give us
5 your recollection of kind of what issues were
6 involved with her position and pay based on
7 education?

8 A: Well, first of all, the board was misinformed
9 about her educational credentials.

10 Q: And we've heard some of that background,
11 but ---

12 A: Uh-huh.

13 Q: --- you know, each person can have different
14 recollections. So what was your recollection
15 of what had occurred with regard to her
16 credentials?

17 A: That she was in school and she was working on
18 getting a degree. And she was given a certain
19 length of time to complete it. And with the
20 changing of superintendents, it just fell
21 through the cracks with the new ones that were
22 coming on, and I guess they didn't know to ask
23 her or to check with her to see if she had ever
24 received a degree to be in that position and
25 with the salary. Because we were receiving



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1 critique from the public that knew that this
2 person did not have the educational background
3 to be in a position of this prominence.

4 Q: And when that instruction was given to
5 Ms. Stroud, accurate to say -- and I don't
6 remember exactly, but I believe -- was it Barry
7 Campbell that was the superintendent at that
8 time?

9 A: Yes, uh-huh.

10 Q: And so if Dr. Slayman was following up on that,
11 it wasn't even at her own initiation; it would
12 have been from the board and the prior
13 superintendent?

14 A: Yes.

15 Q: Do you believe or do you have any knowledge to
16 say whether Anna Stroud feared for her job?

17 A: No. She thought she had it made.

18 Q: There's been some reference kind of
19 interchangeably within the Bagley report and
20 the grievance statements and testimony about
21 their opinions about Defender and the security
22 change. Can you explain to us what prompted
23 the school board to vote to place private
24 security Defender in place rather than strictly
25 the school resource officers through the



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1 sheriff's office?

2 A: The funds had been cut from the State of
3 South Carolina from the legislature that year.
4 And the County was not able to appropriate
5 enough funds for resource officers that the
6 State told them they would have to pick up. So
7 in order to supplement that, the board as a
8 whole decided that we would go a different
9 route. And that's how Defender came into play.
10 Because we were trying to cover -- we realized
11 after the Sandy Hook shooting of the children
12 that where the State and the federal government
13 had been concentrating on the larger children,
14 that they had forgotten about the elementary
15 school children. And so as a board, we decided
16 that they needed to be covered as well. And
17 with the funds that we had allocated for that,
18 we would be able to pay a security company to
19 come in and protect the schools, the elementary
20 schools and the middle school.

21 Q: And there had been some question I think at
22 some point during testimony about whether or
23 not Dr. Slayman followed the advice of her
24 senior cabinet. During the time frame that she
25 was superintendent, did you see Dr. Slayman



1 periodically follow the advice of her senior
2 cabinet?

3 A: I was never privy to know what her senior
4 cabinet would have been telling her.

5 Q: Right.

6 A: They never shared it with the board in any of
7 our meetings.

8 Q: But they the senior cabinet spoke at other
9 times during meetings?

10 A: Yes. When they would get up and give their
11 reports. But it was never mentioned, anything
12 other than what the curriculum was happening in
13 the secondary and the primary part.

14 Q: And during your time frame as a board member in
15 Chester County ---

16 A: Uh-huh.

17 Q: --- that would be 1993 to 2007 and then 2011 to
18 the present, has -- have any other, I guess,
19 leaders, administrators in the district ever
20 brought these type of complaints against a
21 superintendent?

22 A: No.

23 Q: Would this be this type of action was outside
24 of the norm?

25 A: Way outside of the norm.



1 MS. POLVI: I beg indulgence if we could take a
2 quick comfort break?

3 HEARING OFFICER: Sure.

4 (A break was taken.)

5 HEARING OFFICER: Ms. Polvi?

6 Q: I don't recall if I asked you this already, so
7 I apologize if it's repetitive. But were you
8 aware of Dr. King and Jeff Gardner, both at
9 different times, seeking the superintendent
10 position at Chester County School District?

11 A: Yes.

12 Q: And what motivations, if any, are you aware of
13 why Brooke Clinton would be a signator on the
14 grievance?

15 A: You want my opinion as to why?

16 Q: Yes, please.

17 A: She's kind of a spoiled brat to me. She's used
18 to having her way.

19 Q: And was there a some manner that, you know, you
20 think she and Dr. Slayman became different in
21 terms of how they were viewing the district and
22 things?

23 A: In my opinion, she was kind of like a takeover
24 person. Even though she's not the
25 superintendent, she probably thought that she



1 was a great advisor or she should be
2 listening -- Dr. Slayman should have been
3 listening to her for -- or for her opinions,
4 that kind of personality.

5 Q: When you were in the district office, did you
6 notice whether Dr. Slayman's door was usually
7 open or closed?

8 A: It was usually open.

9 Q: And did Dr. Slayman ever seek to remove any of
10 her senior cabinet, as far as you're aware?

11 A: Say that again?

12 Q: Did she ever seek to remove any of her senior
13 cabinet from their jobs?

14 A: Oh, no.

15 Q: Did you think at any point, based on your
16 personal knowledge, they perceived her as
17 somehow doing some kind of effort towards
18 harming their employment?

19 A: No.

20 Q: There was some question about the hiring salary
21 of the person who would be an employee of the
22 district but overseeing the security,
23 essentially the director of security over
24 Defender.

25 A: Uh-huh.



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1 Q: Is that accurate that there was one employee
2 who was gonna be employed by the district, but
3 the rest of Defender would be private, it
4 would, you know, be a private entity?

5 A: Yes, uh-huh.

6 Q: And the pay with regard to the individual who
7 would be the head of security that's a district
8 employee, how was that pay determined?

9 A: The pay was determined that that person was to
10 be on the district payroll. And it would
11 commence based on that person's years of
12 experience as a security person coming from
13 either inside or outside.

14 Q: And so that salary would potentially vary based
15 on who the person was actually selected?

16 A: Yes.

17 Q: As a board member, did you know that the
18 Defender officers did not have arrest powers
19 prior to them being hired?

20 A: We did. I did, uh-huh.

21 Q: Are the Defender officers still employed with
22 the Chester County School District?

23 A: They are.

24 Q: And that the start of their time serving the --
25 with the district coalesced around the same



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1 time that this grievance was filed against
2 Dr. Slayman?

3 A: Yes.

4 Q: And during your time on the board and
5 interacting with Dr. Slayman, how well did
6 Dr. Slayman communicate with you?

7 A: Daily almost.

8 Q: And how would you describe your communications,
9 the manner, friendly, cordial?

10 A: Yeah, very cordial. I didn't have any
11 problems.

12 Q: And is the superintendent in charge of guiding
13 the mission of the district in terms of what
14 they're instructing to their senior cabinet?

15 A: Yes.

16 Q: Are the senior cabinet supposed to follow the
17 guidance and decisions of their superintendent?

18 A: They are.

19 Q: When Dr. Hughes ran for the school board a
20 second time to begin essentially a tenure that
21 would start at the beginning of January 2015,
22 did you have any suspicions as to why he was
23 running?

24 A: Yes, I did.

25 Q: And what were they?



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THE STATE OF SOUTH CAROLINA
In the Administrative Law Court

APPEAL FROM THE SOUTH CAROLINA DEPARTMENT OF
EDUCATION

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

Dr. Agnes Slayman,

Appellant,

v.

South Carolina Department
of Education,

Respondent.

RECORD ON APPEAL

Volume III

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1 A: Well, the main suspicion I had, I couldn't
2 understand why someone who had sent his
3 children to private schools want to be over
4 community children that were in public school.

5 Q: And was Dr. Hughes, part of his job in income
6 sourcing from the sheriff's office?

7 A: Yes.

8 Q: And did his decision to run, Dr. Hughes,
9 timingwise, did that occur after discussions
10 had already started that Defender or private
11 security firm would be hired in lieu of the
12 sheriff's office for SRO purposes?

13 A: It came right after, I think, he came on the
14 board, because he recused himself from -- he
15 was very -- seemed very distraught about that.
16 And I can remember saying to him -- I asked him
17 why was he so very scared of his position, and
18 he said I'm just trying to keep my job, uh-huh,
19 and get along or something to that effect.
20 Because he seemed just petrified of the
21 sheriff. I don't know for what reason that may
22 have been, uh-huh.

23 Q: With regard to your earlier testimony, we
24 talked some about the Betty Bagley report.
25 Is -- there's always been some kind of



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1 confusion as to kind of the chicken and the
2 egg, what happened first. Is the first time
3 you heard any details of what was being
4 complained about with Dr. Slayman, did that
5 source from the Betty Bagley investigation?

6 A: Yes.

7 Q: And that the grievance was filed after she
8 wrote up a document, which we kind of refer to
9 the Betty Bagley report?

10 A: Well, we were told there would be no document
11 at first, that she would just make her report
12 and that would be it.

13 Q: What were you told about how the Bagley report
14 was compiled?

15 A: We told the attorneys who were to be -- who she
16 would talk with, we told them the people that
17 we would allow them to speak with, mainly the
18 senior staff. We didn't know at that time,
19 like I said, who it was coming from. So the
20 senior staff because we felt like they would
21 know.

22 Q: And who was the person or, you know, or persons
23 who first proposed Betty Bagley? Like, how did
24 she even come into the picture?

25 A: Through Attorney Allison Hanna.



1 Q: With regard to the transition of Dr. Slayman
2 out of her position and someone in need of an
3 interim role, you now, the district in need of
4 an interim role, when did Dr. Callicutt begin
5 with the district?

6 A: It was almost immediate as an interim. I think
7 in my notes it was the 30th when we had the
8 special-called meeting and he was -- we
9 interviewed several candidates, and he was the
10 one that we all basically knew because of his
11 ties to Chester. And he was selected that
12 night.

13 Q: And the complaint that was filed with the
14 Department of Education, you were not aware of
15 it at the time it was sent?

16 A: Never knew about it at all. Never made aware
17 of it until recently until all of this came up.

18 Q: And when Dr. Callicutt became interim
19 superintendent, what type of onboarding or kind
20 of introduction to the district occurred?

21 A: He had meetings with all of the board members.
22 He met with the senior staff. He met with all
23 of the principals and probably met with a few
24 teachers as well. And like I said, because
25 Chester was his home at one time, there may



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1 was the supervisor for Springs Industries for
2 years. Dr. Hughes' father came in as the
3 doctor for Springs Industries. So, yes, he
4 knew. He also knew me because we lived on
5 opposite sides of the street. Basically he was
6 raised on Gail Mill Hill. That's what we used
7 to call it. Dr. Callicutt and, as well
8 Dr. Hughes, they were part of that Gail Mill
9 Hill crowd that they had residence for his
10 father when he came in to Chester as the doctor
11 for Springs Industries so they had a special
12 place. And I went to school -- I graduated
13 from high school with Dr. Hughes' brother. So
14 that's the connection I know we had. And
15 Dr. Callicutt's brother was an outstanding CHS
16 football player. A lot of people knew him in
17 Chester, and they knew connections. Okay.

18 Q: And with regard to earlier in your testimony,
19 you referred to, release it, I think is the --
20 there was some reference to a statement on a
21 telephone call?

22 A: Uh-huh.

23 Q: Did you make any conclusions based on what you
24 heard as to what was being released?

25 A: At the time, we were on our way into executive



1 session, and we were coming through a crowd of
2 people. And he was just yelling. He was
3 behind me, and he was just yelling so -- do it
4 now, right now. And I wondered what was going
5 on because we were going into executive
6 session. You know, a crowd of people all
7 around us. What was so urgent of what was
8 happening that he was making that kind of
9 statement. And at the time, I couldn't imagine
10 it. And then right after we got into that was
11 when Allison told us that the Bagley report had
12 been released.

13 Q: And did you connect those two dots as somehow
14 being causally related?

15 A: Yes, uh-huh.

16 Q: And what do you believe -- based on your
17 personal observation, what do you believe was
18 being -- do it now, what was being done?

19 A: That whoever was on the outside that had the
20 report, that they were being told to release it
21 to the media. Because it was just like
22 clockwork while we were in the hearing. And
23 before I could get home, people's phones were
24 buzzing all over the place.

25 Q: I'm kind of towards the conclusion here. I



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1 want to follow up a little bit about the
2 grievants in and of themselves. Is that you,
3 as a board member, hearing essentially the same
4 information we've heard throughout this
5 disciplinary hearing, what was your conclusion
6 from hearing the grievants?

7 A: I didn't believe them. I said that from day
8 one when Ms. Bagley came with the report to us
9 the night she came that I didn't believe any of
10 it. And when she left the room or was
11 dismissed, she rolled her eyes at me that
12 night. And I guess she was thought she was
13 intimidating me for saying what I believed.
14 Because it didn't have weight with me at all.
15 It all seemed to be made up, uh-huh.

16 Q: And I've covered, I think, the bulk of what I
17 wanted to ask you about. And but before I hand
18 over the torch for other questions, is there
19 anything that I haven't asked you about that
20 you think is important for Ms. Pike to know?

21 A: Dr. Slayman was an outstanding leader of our
22 district during the time that she served. It
23 was very disheartening to know that she was
24 surrounded by the kind of people that would set
25 out to destroy someone's career. I had never



1 been caught up in any situation like that
2 before that brought on personal attacks from
3 people in the community. I felt threatened.
4 My life was in danger. I had people following
5 me, people taking pictures of me at various
6 places. It was just an onslaught of things on
7 the media, on social media. Information was
8 being put out there. I had a drawing of
9 someone went on a map of Chester community and,
10 I guess, googled earth and googled my home and
11 put it out there on the Facebook page.

12 It was just unbelievable how they were able to
13 enrage a community against the educational
14 process for our children trying to disrupt the
15 educational process for the children of Chester
16 County all because they thought they were gonna
17 gain something personally. And I know that you
18 may think you have a harvest, but you reap what
19 you sow. And karma can really be something
20 when it comes back into your own life.
21 Dr. Slayman did not deserve what happened to
22 her, and I just -- as a board member, I just
23 hope and pray that I never have to live through
24 anything like that again in my life.

25 Q: I thank for your testimony. And Mr. Winburn



1 has the opportunity to ask you questions, as
2 well Ms. Pike.

3 A: Okay.

4 **MS. JAMES - CROSS-EXAMINATION BY MR. WINBURN:**

5 Q: Ms. James, my name's Scott Winburn. I'm a
6 lawyer for the Department. I've just got a
7 couple things. Do you think any of the folks
8 that filed the grievance are credible?

9 A: No.

10 Q: Not one?

11 A: No.

12 Q: Okay. Now, you asked -- you were asked for a
13 commonality. And if I may, Petitioner's
14 Exhibit 8 is a letter to you, I believe. Dear
15 Ms. Lawson, we are formally filing an official
16 grievance due to a hostile work environment,
17 implications of ethical violations, and racial
18 and threatening remarks by Dr. Slayman,
19 superintendent of the Chester County School
20 District.

21 Next paragraph: We are requesting a
22 closed-door meeting of the board as a group to
23 present our concerns to the board of trustees.
24 We respectfully request that Dr. Slayman not be
25 attendance during this meeting, sincerely,



1 Dr. Charles King, Mr. Jeff Gardner, Ms. Shawn
2 Williams, Ms. Anna Stroud, and Ms. Brooke
3 Clinton. Now, you agree you received that
4 letter?

5 A: I did.

6 Q: All right. So in terms of commonality, would
7 you not agree that they all signed it? Did
8 they sign it?

9 A: Yes, they signed it.

10 Q: And did they -- included in that letter would
11 be ethical -- allegations of ethical
12 violations, racial and threatening remarks? Do
13 you agree with that?

14 A: No.

15 Q: That's what they wrote?

16 A: Yeah.

17 Q: That they all wrote that?

18 A: Yeah. But I don't agree with it.

19 Q: All right.

20 A: Uh-huh, I'm not agreeing with it.

21 Q: All right.

22 A: Uh-huh.

23 Q: Now, you mentioned -- let me back up a minute.
24 You said they were three candidates for
25 superintendent at the time Dr. Slayman was



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1 being hired. Who were the top three
2 candidates?

3 A: A gentleman from North Carolina and one from
4 South Carolina.

5 Q: Do you remember who the South Carolina
6 gentleman was?

7 A: He's a current superintendent now in a county.
8 But I can't remember his -- I think his last
9 name was Sanders, but I don't remember his
10 first name.

11 Q: Okay. Let me ask you about petitioner --
12 Respondent's Exhibit Number 6. Now, this is,
13 just for the interest of time, two board
14 members from Dr. Slayman, August 10th, 2014?

15 A: Uh-huh.

16 Q: So I wanted to highlight a couple of things for
17 you or ask you questions. Under facilities,
18 now these are -- this is a list
19 accomplishments, right? Would you agree with
20 that ---

21 A: Let me see that.

22 Q: --- generally?

23 A: Let me see the exhibit.

24 Q: Sure.

25 **HEARING OFFICER:** What exhibit is that?



1 Respondent's ---

2 MR. WINBURN: Exhibit 6.

3 HEARING OFFICER: Okay.

4 MS. POLVI: I've give you a copy in one second.

5 A: Which page?

6 Q: On page 4.

7 A: Page 4, okay.

8 Q: I'm sorry. Let's do page 3. Let's go in
9 order, so facilities ...

10 A: Uh-huh.

11 Q: Now, would you agree that Jeff Gardner was over
12 facilities?

13 A: He was.

14 Q: So this is a list of his accomplishments in
15 part contributed by Ms. -- Dr. Slayman:
16 Security cameras placed in all schools, buzzer
17 door systems, IP phones placed in classrooms,
18 work to maximize use of capital improvement
19 funds, and energy audit completed. Those are
20 listed in this document, correct?

21 A: Yes, it is.

22 Q: All right. And you'll agree Jeff Gardner was
23 in charge of facilities at the time?

24 A: He was doing the facilities.

25 Q: Now, while we're on the topic of Mr. Gardner,



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1 you essentially -- I think it's testified to --
2 initially I didn't object to it. You said that
3 you heard he didn't want to be ordered around
4 by a woman, essentially?

5 A: Yes.

6 Q: Right? And so but yet you also testified that
7 Dr. Slayman asked him to come work for her; is
8 that true?

9 A: He had been trying to get in the district
10 office for some time?

11 Q: And who asked him this time?

12 A: I guess he applied for the job that was open.
13 She didn't ask him to come ---

14 Q: Oh, she didn't?

15 A: He applied for it.

16 Q: Weil, maybe she'll testify. The -- did she
17 decide on who to hire as her cabinet?

18 A: Usually, the -- a person goes through a
19 committee, and the committee make
20 recommendations. And that doesn't mean that
21 the person has the job. The superintendent has
22 the final say.

23 Q: Did he work for a woman?

24 A: Yes, he did. He accepted the position from a
25 woman.



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1 Q: Thank you.

2 A: Uh-huh.

3 Q: All right. Now, going on down, Brooke Clinton,
4 who was in charge of technology, I guess,
5 generally. Bottom of page 4, public relations
6 officer provides effective communication via
7 website, Facebook, phone messages, continue
8 relationships with the media, evidenced by
9 effective communication during inclement
10 weather. That was Brooke Clinton, right.

11 A: Yes.

12 Q: And you called her a spoiled brat?

13 A: She is.

14 Q: Okay.

15 A: Uh-huh.

16 Q: Do you know if she testified in this case?

17 A: I don't know whether she came to this hearing
18 or not.

19 Q: Did you speak to her about the grievance that
20 she filed?

21 A: No.

22 Q: You didn't? Okay. Did you speak to any of
23 these individuals about the grievance they
24 filed?

25 A: They didn't file a grievance.



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1 Q: What is this? We've been talking about it ---

2 A: Only thing they did was give us that sheet. We
3 met with them in executive session, and they
4 sat and told what they wanted to selectively.

5 Q: And you never asked a single question?

6 A: No. I had no reason to.

7 Q: You didn't believe it.

8 A: No.

9 Q: You thought they were full of it?

10 A: Yes.

11 Q: Okay. So do you know if any of these
12 individuals testified under oath in this case
13 to Ms. Pike?

14 A: I don't have any idea who has been here and who
15 has not.

16 Q: Do you care if they've testified?

17 A: That is not up to me to decide whether they did
18 or didn't or what they said.

19 Q: Okay.

20 A: Uh-huh. I'm here for myself.

21 Q: I understand. Human resources, same exhibit,
22 page 4: Continue to Grow your own Leaders
23 Program, continue support staff of the year
24 award, increased applicants, registered for
25 district teaching recruitment, emphasized



1 diversity in recruitment, improved employee
2 morale. Now, Shawn Williams was in charge of
3 that, right?

4 A: Right.

5 Q: All right. Did she do a good job?

6 A: No.

7 Q: Okay. Operations, I don't know who was in
8 charge of that. Dr. King, maybe. Update
9 emergency crisis management plans in all
10 schools: Do you agree that's listed?

11 A: It's listed, but he didn't facilitate that.

12 Q: All right. I'm not sure who did. Maybe this
13 was Jeff Gardner again. Joint training with
14 first responders at Great Falls area in
15 district office. Do you know if that included
16 the sheriff's department in the joint -- as a
17 first responder?

18 A: I cannot say, because right at this present
19 time, we are talking with the sheriff's
20 department. And let them tell it, they have
21 never been able to get in any of our schools
22 and do any training whatsoever.

23 Q: Okay.

24 A: Uh-huh.

25 Q: How about budget? Now, this is a good one.



1 Budget, who was in charge of the budget at the
2 time?

3 A: Well, the superintendent is always ex officio
4 of the budget.

5 Q: But who in her office serves in the role of
6 finance director, CFO, et cetera? Who would
7 serve ---

8 A: We didn't have a CFO at that time.

9 Q: Yeah. I know. Was it fair that Ms. Stroud was
10 kind of wearing multiple hats?

11 A: She was a director.

12 Q: Okay.

13 A: Uh-huh.

14 Q: Audits conducted as needed. No irregularities
15 found. Do you agree with that?

16 A: Not entirely.

17 Q: Okay.

18 A: Uh-huh.

19 Q: How about the third one from the bottom,
20 financial audit receives, quote, all clear from
21 Green Finney and Horton. Now, is that any of
22 that attributable to Ms. Stroud in her diligent
23 work ethic?

24 A: I would say she was a ---

25 Q: She got lucky?



1 A: No, she didn't get lucky. She just followed
2 the pattern that had already been set by the
3 previous person that held that position. So it
4 was more of a copycat-type setup that she
5 had -- that she was continuing.

6 Q: Okay. She just right -- place right time, huh?
7 Okay. So you gave Dr. Slayman increases based
8 on, in part, these items; is that fair to say?
9 You increased her annuity. You increased her
10 travel budget \$800 a month; is that fair to
11 say?

12 A: We did.

13 Q: Okay. But you froze Ms. Stroud's -- you froze
14 her salary because of her credentials; is that
15 right?

16 A: The board did that. I did not do it. The
17 board -- it was a board decision.

18 Q: Okay.

19 A: Because she had a certain length of time to
20 provide her credentials that she had done what
21 was asked of her.

22 Q: Okay. Now, there's been -- I want to go back.
23 You testified at the beginning that prior to
24 the filing of the grievance, you were not aware
25 of these allegations?



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1 A: No.

2 Q: All right. So I just want to be real clear on
3 this. The grievance, as you understand it, is
4 this a formal letter? It's dated September the
5 8th. This is Petitioner's Exhibit 8. Is that
6 what you're referring to?

7 A: About the grievance?

8 Q: Right.

9 A: We received that secondhand. I don't consider
10 it to be official because it's not on any
11 official stationery. Did not come from the
12 lawyer that was there representing them. It
13 was something that they did as a last-ditch
14 effort.

15 Q: How do you know it didn't come from the lawyer
16 representing them?

17 A: Because it would have been on his stationery,
18 and it's not on any official stationery.

19 Q: Do you know whether he was advising them at the
20 time?

21 A: No, I don't.

22 Q: Do you know whether a EEOC requirement requires
23 a formal written grievance to be filed?

24 A: That wouldn't be under EEOC. That would be --
25 they did not follow the procedures set forth in



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1 the Chester County School District policy
2 manual for filing a grievance.

3 Q: All right. And so would -- what should they
4 have done, according to you?

5 A: I don't have the policy manual here before me.
6 So I'm not gonna guess.

7 Q: Yes, ma'am. But you've been testifying a whole
8 lot about the way they went about it was wrong.

9 A: Uh-huh.

10 Q: I want to know the right way they should have
11 reported this.

12 A: Okay. But since I don't have the policy manual
13 to give you word for word.

14 Q: Right. I just want to know your understanding.
15 That's all.

16 A: I know my understanding. But I don't have it
17 here before me to give you the word for word,
18 so I'm not gon' sit here and try -- I don't
19 have the entire grievance manual memorized. So
20 I'm not gonna be guessing.

21 Q: Okay. So back to the Betty Bagley report. I
22 understand your testimony, you were the one who
23 told her, instructed her let's just talk to the
24 senior staff?

25 A: Uh-huh.



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1 Q: Is that because you knew that the allegations
2 were coming from senior staff?

3 A: We were trying to limit the scope because we
4 did not -- as a board, we did not want the
5 district disrupted. And so I did not make that
6 decision alone. It was made with the other
7 board members as well.

8 Q: Right. But it's in your statement, right?

9 A: Yes. And I spoke out about it; yes.

10 Q: Right.

11 A: Uh-huh.

12 Q: So she was ---

13 A: But they -- just because I did that, they
14 didn't have to go along with me. They could
15 have said no.

16 Q: But you would agree ---

17 A: They went with everybody else.

18 Q: You would agree that based on her report ---

19 A: Uh-huh.

20 Q: --- she's only listed Jeff Gardner, Shawn
21 Williams, Brooke Clinton, Anna Stroud, Charles
22 King, Jean Ligon -- Callie McConnell will be
23 here today, I believe -- and Dr. Slayman.
24 Those are the folks she interviewed; is that
25 your understanding?



1 A: Yes.

2 Q: And you agreed at the time to limit it to those
3 people?

4 A: Yes.

5 Q: At the time, were you aware of any of the
6 allegations, the underlying allegations?

7 A: No.

8 Q: But you approved of Betty Bagley to come in and
9 do her investigations?

10 A: Along with other board members.

11 Q: Sure.

12 A: I couldn't approve it by myself.

13 Q: Right. But you were ---

14 A: I'm a member of a seven-member board, and it
15 takes all of us.

16 Q: Right. Let's talk about that -- those seven
17 votes. Now, on mootness, you guys voted 7 to
18 nothing to determine that the allegations
19 contained in the Betty Bagley report were moot;
20 is that correct?

21 A: We wanted it to be no merit.

22 Q: But that's not what happened?

23 A: No. Because the attorneys advised us that
24 "moot" was the better word for it.

25 Q: Did you ever have a -- you never questioned a



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1 single person who's made these allegations.
2 Workers in your district, you never asked them
3 one single question?

4 A: I had no reason to try to interrogate anyone.
5 I'm not an investigator.

6 Q: But you're on the board?

7 A: Yes.

8 Q: And they appeared before you guys to try to
9 tell their story; is that correct?

10 A: That was a setup. It was a setup. They were
11 scripted in what they were saying because they
12 had an attorney present.

13 Q: But aren't you supposed to be a neutral arbiter
14 of things that come before you as the governing
15 board of the district?

16 A: I am neutral in the respect that people are
17 sometimes not honest.

18 Q: Well, you think all five of these people are
19 not honest?

20 A: I certainly do.

21 Q: Okay. All right. You but to be real clear on
22 this, the board did not vote on the merits of
23 the allegations one way or another? They
24 decided -- the board decided now that she has
25 resigned, Dr. Slayman has resigned, we are



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1 going to consider this moot, and we're not
2 going to take it up to make a final
3 determination; is that a fair way to frame it?

4 A: Our attorneys -- and you trust the attorneys --
5 you feel that they're giving you correct
6 information.

7 Q: All right. But they work for you.

8 A: We wanted to go with no merit, and they kept
9 insisting on the moot will take care of that.

10 Q: On what basis would you have voted no merit if
11 you didn't ask a single question?

12 A: I didn't need to ask them any questions.

13 Q: Okay. As to the -- I hope I'm real clear in
14 the record. I'm gon' try to be. What is your
15 understanding of the duties to report
16 allegations of unprofessional conduct to the
17 State Department? I mean, is it your belief
18 that Dr. Keith Callicutt broke a law, violated
19 in some ethics? What is your position as to
20 Keith Callicutt's report of the allegations?

21 A: Being that he was the interim, he was not there
22 firsthand, anything that he would have written
23 would have been, as you, per se, hearsay. So
24 why was he to be believed in sending a letter
25 down here without authorization from the board



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1 being instructed by the entire board, and not
2 two members to send that type of letter down
3 here requesting that.

4 Q: Now, do you think he had to get your
5 permission?

6 A: Yes. The entire board. Not my permission, the
7 board permission.

8 Q: Would you agree that Dr. Slayman resigned amid
9 allegations of unprofessional conduct?

10 A: She resigned amid the pressure and, I would
11 say, underhanded, undermined tactics of
12 lawyers -- of a lawyer, uh-huh.

13 Q: So is that a "yes" or a "no"? Were there
14 allegations in the community that she had
15 behaved unprofessionally, yes or no?

16 MS. POLVI: Object to the form. That's not the
17 question that he asked previously. It was ---

18 MR. WINBURN: Well, I'm asking another one.

19 Q: Were there allegations of unprofessional
20 conduct alleged against Dr. Slayman?

21 A: By the grievants, not by the community and by
22 the grievants.

23 Q: All right.

24 A: Not by the community; by the grievants.

25 Q: Right. You would agree that five people



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1 alleged she misbehaved essentially? She had
2 acted unprofessionally, would you agree with
3 that? Just the mere allegations. I'm not
4 asking you to believe it or not ---

5 A: No, agreeing to anything that they did, because
6 I'm telling you, they were unreal. They
7 were -- it was a conspiracy. It was a
8 deliberate conspiracy.

9 Q: For what?

10 A: Of two people I know, individuals that wanted
11 her position.

12 Q: Well, how about Shawn Williams? What's her
13 beef? What's Brooke Clinton's beef? What's
14 Anna Stroud's problem?

15 A: All of them had takeover mentally. They didn't
16 want to do what they were told to do.

17 Q: Oh, yeah?

18 A: They felt like they didn't have to listen to
19 Dr. Slayman. They didn't have to do what she
20 wanted for the district. They thought they had
21 the better advice for the district.

22 Q: Is that -- any of that ---

23 A: They were like little subsuperintendents.

24 Q: Is any of that in this report, Betty Bagley's
25 report?



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1 A: No. Did you ask me my opinion?

2 Q: Yeah. I want to know. Again, if the board
3 voted 7 to zero to declare the allegations in
4 the Betty Bagley report as moot, is it fair to
5 say that the board, Chester County, never
6 adjudicated those allocations -- allegations,
7 never made findings of whether they had merit
8 or whether they had no merit?

9 A: We knew that they didn't have merit.

10 Q: But you voted seven to nothing to not make that
11 determination?

12 A: Yeah.

13 Q: Right. And still you kept saying let the EEOC
14 handle it. Let the chips fall where they may
15 if they need to sue us. And y'all didn't let
16 the chips fall where they may. You never asked
17 them a single question, fair?

18 A: They never filed the EEOC. They never filed
19 the civil rights.

20 Q: Okay.

21 A: They didn't even have to have our permission to
22 do that. They could have done that on their
23 own.

24 Q: All right. So I'll try to get you to answer
25 this question again: What do you think they



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1 should have done in order to pursue their
2 claims in a way that complied with district
3 policy?

4 A: Filed the grievance the way it was supposed to
5 be filed with the Chester County School
6 District personnel policy regarding the
7 grievance procedure and not contact the board
8 member that you know personally to get a heads
9 up.

10 Q: All right. Hold on a sec. Do you know whether
11 it -- Dr. Callicutt would have been required by
12 law to report these allegations to the
13 Department?

14 A: Considering that he was an interim, I would
15 still think that it would take board action for
16 him to be able to do that. For him to have not
17 done that shows his disrespect and his
18 disregard for the authority that we had a
19 board.

20 Q: So is that a no? He didn't have the authority?
21 He wasn't required by law to report it?

22 A: I'm not gon' argue the law on -- with you.

23 Q: Fair enough. Going to your statement
24 briefly -- and I'll try to finish up. And
25 there are some points that I got to hit. On



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1 page 3 you say they, especially Dr. Richard
2 Hughes, seemed to want to protect the
3 complainants more than the superintendent who
4 was supposed to be concerned about or have he
5 best -- that's in parentheses -- Dr. Slayman's
6 interest at heart. So is it your position that
7 your board -- your -- as a board member,
8 Dr. Slayman's interests supersede those of any
9 district employee? Is that your position?

10 A: As a board member, we hired her. And he was
11 not a part of that. She was hired to oversee
12 the business as well as the general aspects of
13 the district.

14 Q: But you would agree that the complainants, all
15 five of these individuals, are employees of the
16 district, right?

17 A: They're employees.

18 Q: Did you not ---

19 A: They were employees.

20 Q: Did you not believe that they need to be heard?

21 A: They had a conspiracy going. And for
22 various -- whatever, various or personal
23 reasons they may have had that they thought
24 maybe was gonna advance their careers. I don't
25 know.



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1 Q: Okay. You also indicated -- I think we've
2 covered it, but I want to ask a different way.
3 On page 5, Dr. Slayman had a financial auditor
4 to come in and check our financial status and
5 then a discrepancy was found. Do you know what
6 that discrepancy was?

7 A: Any time anyone come into the administrative
8 role as she came into, it is customary that
9 they have the books checked. And seeming that
10 that was part of her job to know exactly where
11 taxpayers' dollars were going, how they were
12 being spent, she had the authority to do what
13 was necessary in order to make sure that the
14 reins that she was taking over were correct.

15 Q: Okay. You also, in your statement, indicated
16 a few principals -- and then you name them --
17 starting recruiting efforts of other principals
18 and staff to join their complaints against
19 Dr. Slayman. Now, do you know whether any
20 principals are listed to testify in this case?

21 A: Have no idea.

22 Q: Okay. What was the vote to accept her
23 resignation? Was it 7 to nothing, 4 to 3?

24 A: No. It was eventually accepted as -- we were
25 split.



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1 Q: Okay. And you also in your report -- I'm
2 sorry -- your statement on page 9, indicate
3 that on a 4-3 motion the board voted to obtain
4 more information concerning the grievance. Is
5 that your recollection? That's on page 9. Oh,
6 I'm sorry. Okay. No. I think this is after
7 the Bagley report with a board vote.

8 A: And yes because we weren't sure about all of
9 the things that she had had to say in that
10 report.

11 Q: So this meeting of the five folks that filed
12 the grievance, is that what you're referring to
13 was the 4-3 vote to hold the meeting or -- with
14 them and ask them questions, or what do you
15 remember about that?

16 A: We either wanted more information from them and
17 not just one simple statement that they may
18 have given or that we were told about in the
19 report from Ms. Bagley.

20 Q: But you didn't ask one single additional
21 question because you didn't believe them; fair
22 to say?

23 A: Ms. Bagley gave her report, and I stated at
24 that time my position. And I stand by it.

25 Q: Now, again, on the bottom of page 9 -- and I



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1 think we have covered this. And I'm not asking
2 you for a legal conclusion. I just want to
3 know your understanding. The last sentence,
4 after exiting executive session, we --
5 parentheses, the board -- voted unanimously to
6 deny the employment grievance as moot. And in
7 your mind, does that basically mean we decided
8 not to take up the grievance?

9 A: We took up the grievance. We heard from the
10 people. The attorneys advised that moot would
11 mean that it basically did not exist, based on
12 their definition, the definition that they gave
13 us. And that's what we acted on.

14 Q: And, again, is it your understanding that
15 Mr. Callicutt resigned after he asked you guys
16 what -- whether you would consider
17 Dr. Slayman's application if she reapplied?

18 A: You asking me -- say that again?

19 Q: I'm sorry. There was consideration for what --
20 what would the board do had the -- had
21 Dr. Slayman reapplied for the job? Was there
22 discussion about that?

23 A: No, not that I can remember. No direct
24 discussion on it.

25 Q: So between the Bagley report and this grievance



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1 filed on September 8th, was there consideration
2 for bringing Dr. Slayman back in and letting
3 her come back to work?

4 A: That had not been discussed.

5 Q: Was there -- was it ever discussed that
6 Dr. Slayman would come back from the, quote,
7 vacation that she was on? What's your
8 recollection of that?

9 A: When she was on vacation, we -- she came back.
10 And she worked. And the same employees that
11 had stated what they wanted from her, the same
12 day she returned, they made the same complaint
13 again.

14 Q: In the form of this ---

15 A: No.

16 Q: --- September 8th ---

17 A: They did it verbally. They called the
18 chair ---

19 Q: Okay.

20 A: --- and told her.

21 Q: Do you know whether Dr. Slayman was to come
22 back under an improvement plan of some sort?

23 A: There was an improvement plan, but it was the
24 plan she was gonna write up as to what she
25 would be doing differently.



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1 Q: Do you remember what some of those changes were
2 going to be?

3 A: No, I don't.

4 Q: But it's your testimony that Dr. Slayman was
5 going to write up an improvement plan?

6 A: Basically the attorneys were trying to -- I
7 don't want to say write up something, some
8 bogus -- something that was not credible,
9 because it wasn't accepted if they did it,
10 whatever they gave us at that time. And you're
11 asking me things that you're trying -- from
12 three, almost four years ago now. I don't
13 remember all the exact details.

14 Q: That's okay. I'm not ---

15 A: You know.

16 Q: --- this is not a test.

17 A: So but I do know that she had an improvement
18 plan. Theirs was not acceptable to us, the one
19 that we may have been given by a lawyer -- the
20 lawyers. But her improvement plan was the one
21 that was presented to us.

22 Q: Okay.

23 A: Uh-huh.

24 Q: And I'll try to finish up. My apologies. The
25 bottom of page 10, your statement -- well, you



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1 made this for the record: Because I thought I
2 knew him, it was shocking to me to believe that
3 he would come into this situation and join in
4 with two board members, Chair Denise Lawson and
5 Richard Hughes, the employees that had made
6 unsubstantiated allegations on a person that he
7 had never personally worked with or known.
8 Now, you said unsubstantiated; is that correct?

9 A: Correct.

10 Q: But they weren't refuted. The allegations were
11 never refuted by the board officially?

12 **MS. POLVI:** Object to the form of the question.

13 Q: It's a question. Were the allegations ever
14 refuted, saying this didn't happen?

15 A: I stand by what I said here, unsubstantiated
16 allegations.

17 Q: Okay. I think that's all I have. Thank you
18 for your time.

19 **MS. JAMES - EXAMINATION BY THE HEARING OFFICER:**

20 **HEARING OFFICER:** I have just one question for you?

21 A: Sure.

22 **HEARING OFFICER:** And it'll be easy, I think.

23 A: Okay.

24 **HEARING OFFICER:** You had testified that
25 Dr. Callicutt seemed to have aligned himself



1 with the a few principals and they had been
2 meeting and urged him on how to control the
3 board members. What -- and feel free to tell
4 me you don't know this, if you don't know it.

5 A: Uh-huh.

6 **HEARING OFFICER:** What interest did Dr. Callicutt
7 have in all of this?

8 A: That is the same question I have asked myself
9 ever since I found out that he did this. What
10 interest was it going to serve him, a man that
11 I considered to have had a stellar career in
12 education, to have joined in on basically
13 hearsay information and send the letter, which
14 I have never seen, here to the State Department
15 of Education against Dr. Slayman?

16 **HEARING OFFICER:** Do you know if Dr. Callicutt had
17 any connections to Dr. King or to Mr. Gardner
18 or Ms. Williams or any of those people?

19 A: Not to my knowledge. I have no way of knowing
20 that, in the field of education, if they had
21 ever met him ---

22 **HEARING OFFICER:** Right.

23 A: --- they knew him going to conferences. I have
24 no knowledge of any of that, you know.

25 **HEARING OFFICER:** Do you know if Dr. Callicutt had



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1 any relationship with Dr. Hughes?

2 A: Yes. I believe they had a connection because
3 of the connection that I had stated
4 previously ---

5 **HEARING OFFICER:** With Springs?

6 A: --- that his father working for Springs and his
7 mother worked for Springs and Dr. Hughes'
8 father being the doctor for Springs Industries
9 in Chester County. And he may have known --
10 Dr. Callicutt may have known Dr. Hughes'
11 brother who was two years behind -- he was my
12 classmate. He was two years behind, because
13 Dr. Callicutt was two years ahead of me in high
14 school. He graduated with my sister. So, yes,
15 they should have known each other very well,
16 uh-huh.

17 **HEARING OFFICER:** And had Dr. Callicutt been a
18 superintendent somewhere else in another
19 district and had retired? Was that the
20 situation there?

21 A: He had been in Fort Mill.

22 **HEARING OFFICER:** Okay. And was the superintendent
23 in Fort Mill?

24 A: Yes, he was the superintendent at Fort Mill.

25 **HEARING OFFICER:** And was he retired -- was he



1 retired from that position?

2 A: Yes, he retired, I believe. He may have gone
3 another place after he left Fort Mill, but I
4 don't know where. I just remember him being --
5 that was -- I think when he became
6 Superintendent of the Year while he was in Fort
7 Mill. And because he was a Chesterite, you
8 know, we were enthused about that when that
9 happened for him.

10 **HEARING OFFICER:** Was there ever any discussion of
11 Dr. Callicutt coming out of retirement to take
12 the Chester position?

13 A: He said from day one that he didn't want the
14 position.

15 **HEARING OFFICER:** Okay.

16 A: You know, he wanted to stay in retirement. He
17 was just coming to help us out. And that's why
18 I believe the connection with Dr. Hughes came
19 in, you know, he the reason why he came forward
20 to Chester, uh-huh.

21 **HEARING OFFICER:** Did he come forward and apply, or
22 did someone on the board reach out to him?

23 A: I think someone on the board reached out to
24 him.

25 **HEARING OFFICER:** But as far as you know, he just



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1 applied?

2 A: I cannot tell you how the attorneys went about
3 selecting him, because there were two, three
4 people, I think they brought before us. One
5 maybe -- it's either two or three people that
6 they brought that night, and he was the one
7 that we basically selected.

8 **HEARING OFFICER:** So y'all did not advertise for
9 that position?

10 A: No. Not for that interim position. It was not
11 advertised.

12 **HEARING OFFICER:** Let me ask a question.

13 A: Sure.

14 **HEARING OFFICER:** In the past when y'all had a
15 superintendent to resign or retire ---

16 A: Uh-huh.

17 **HEARING OFFICER:** --- did you typically advertise
18 for an interim?

19 A: I'm trying to remember. Only if we did not
20 have someone in-house that we felt could take
21 the position. Now, Dr. King acted as interim
22 during the interim of us getting
23 Dr. Callicutt ---

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

25 A: --- for like, I think, three weeks. He was



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1 allowed to be in that position. But it was a
2 position that we knew we were not gonna let him
3 stay in, as a board, basically.

4 **HEARING OFFICER:** Was that a unanimous -- do you
5 think that was a unanimous decision that he was
6 not going to stay in that position, or was --
7 were there people on the board that really
8 wanted him to say?

9 A: Which one now?

10 **HEARING OFFICER:** Dr. King.

11 A: There were probably two, at least two I know
12 that probably wanted him to stay in that
13 position. Yeah, uh-huh.

14 **HEARING OFFICER:** Okay. So did you at all find it
15 to be strange that the attorneys would bring
16 three people as suggested interims or interim
17 superintendents?

18 A: No, I did not. Because judging from, I guess,
19 the vibes that they received from the board,
20 they knew that we were not gonna accept
21 Dr. King.

22 **HEARING OFFICER:** In the past, had the attorneys
23 brought y'all candidates for an interim?

24 A: Not that group of attorneys, no.

25 **HEARING OFFICER:** But others had? Other attorneys



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1 had in the past?

2 A: Yes. One other time.

3 HEARING OFFICER: Okay.

4 A: Uh-huh.

5 HEARING OFFICER: So when it -- once Dr. Callicutt
6 resigned ---

7 A: Uh-huh.

8 HEARING OFFICER: --- you were left again with no
9 one in that position.

10 A: Uh-huh.

11 HEARING OFFICER: And if I'm recalling correctly,
12 you didn't have -- you had not conducted
13 interviews, had you at that point, for the new
14 superintendent?

15 A: No, we had not.

16 HEARING OFFICER: So what did y'all do then after
17 Dr. Callicutt resigned?

18 A: Then after Dr. Callicutt resigned -- I'm trying
19 to think did we have we the new attorneys. I
20 think we were under new counsel. And they had
21 a pool of, I guess, retirees or people that
22 wanted to be interim superintendents. And they
23 brought us the list.

24 HEARING OFFICER: And ---

25 A: --- of other people.



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1 **HEARING OFFICER:** And so you selected another
2 retired superintendent from that list to
3 fulfill the position until you could hire a
4 permanent person; is that accurate?

5 A: Uh-huh.

6 **HEARING OFFICER:** And so what -- who was that
7 person?

8 A: Dr. Angela Bain.

9 **HEARING OFFICER:** So she was your interim?

10 A: Uh-huh.

11 **HEARING OFFICER:** And then ---

12 A: She went on to be hired as the full-time
13 superintendent.

14 **HEARING OFFICER:** Okay.

15 A: Uh-huh.

16 **HEARING OFFICER:** Now, when y'all hired a -- the new
17 superintendent ---

18 A: Uh-huh.

19 **HEARING OFFICER:** --- did y'all accept applications,
20 or did you put out an advertisement?

21 A: No, we did not. We were pleased with the job
22 performance that she had done as the interim in
23 the time frame that she had been with us, and
24 we decided to hire her. Everyone was pleased
25 with what she was able to accomplish in the



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1 length of time that she was with us.

2 **HEARING OFFICER:** Okay. And was Dr. Hughes still on
3 the board at that time when Dr. Bain was hired
4 as the superintendent?

5 A: I'm trying to think. It was somewhere in
6 the -- I don't -- can't remember if he was
7 there or he had resigned or if he resigned
8 shortly after that. I can't -- like I said, I
9 don't have those dates before me, uh-huh.

10 **HEARING OFFICER:** So was there any objection to
11 Dr. Bain from your board?

12 A: Just one member.

13 **HEARING OFFICER:** And which member was that?

14 A: Denise Lawson, uh-huh.

15 **HEARING OFFICER:** Did she object to Dr. Bain being
16 the interim as well?

17 A: No, she didn't object to that.

18 **HEARING OFFICER:** So there were no other candidates
19 though for superintendent; is that correct?

20 A: No, huh-uh.

21 **HEARING OFFICER:** Okay. Thank you very much for
22 your testimony.

23 **MS. POLVI:** I just have brief, quick follow-up.

24 **HEARING OFFICER:** Oh, I'm sorry. Excuse me.

25 **MS. JAMES - REDIRECT EXAMINATION BY MS. POLVI:**



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1 Q: Brief follow-up. Mr. Winburn asked you some
2 questions about, kind of paraphrasing but
3 saying, you know, the grievants hadn't been
4 asked a single question. Isn't it accurate
5 that actually they'd been communicating with
6 board members for over a month before
7 Dr. Slayman's end of employment?

8 A: They had.

9 Q: And that they had been interviewed by
10 Ms. Bagley at the instruction of the board?

11 A: Yes.

12 Q: And that they had actually even appeared before
13 you physically at the board meeting?

14 A: Yes.

15 Q: So wouldn't that amount to being heard by the
16 board.

17 A: Yes. We heard from them. They wanted to come
18 and -- they wanted a closed-door meeting, and
19 we wanted it to be open. Because it was like
20 a -- to me, I considered a high-tech lynching
21 because they had -- it was a media spectacle
22 that night.

23 Q: And let's draw into question these individuals'
24 motives is that five senior cabinet get
25 together and file a grievance together



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1 seemingly as a goal to remove Dr. Slayman ---

2 A: Uh-huh.

3 Q: --- would you agree?

4 A: Yes.

5 Q: And that once this grievance was filed and
6 Dr. Slayman was ousted out of her job one way
7 or another -- she voluntarily resigned -- but
8 things were heating up; would that be accurate,
9 that she voluntarily resigned but this would
10 have been a very hard work environment for her
11 to work when her five senior cabinet members
12 have tried to remove her from her job?

13 A: I would assume that it would be personally for
14 anyone to try to stay with that kind of
15 hostility from five people.

16 Q: And the board voted moot, right?

17 A: Yes.

18 Q: But Dr. King didn't file any EEOC complaint,
19 did he?

20 A: No.

21 Q: Dr. King didn't file a complaint with any other
22 governmental entity, did he?

23 A: No.

24 Q: Dr. King didn't even complain to the Department
25 of Education, did he?



1 A: No.

2 Q: Dr. King didn't even file a lawsuit, did he?

3 A: No.

4 Q: Shawn Williams, did she file an EEOC complaint?

5 A: No.

6 Q: Did Shawn Williams complain to any other

7 governmental entity?

8 A: No.

9 Q: Did Shawn Williams complain to the Department

10 of Education?

11 A: No.

12 Q: And did Shawn Williams file a lawsuit?

13 A: No.

14 Q: Jeff Gardner, did he file any EEOC complaint?

15 A: No.

16 Q: Did Jeff Gardner file a single governmental

17 entity complaint?

18 A: No, he did not.

19 Q: Did Jeff Gardner complain to the Department of

20 Education?

21 A: No, he did not.

22 Q: Did Jeff Gardner file a lawsuit?

23 A: No, he did not.

24 Q: Shawn Williams, did we -- hold on. We've done

25 King, Charles -- did we do Charles King?



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1 A: Stroud.

2 Q: Next we need Anna Stroud. Thank you. Anna
3 Stroud, did Anna Stroud file an EEOC complaint?

4 A: No.

5 Q: Did Anna Stroud file any complaints with
6 governmental entities?

7 A: No.

8 Q: Did Anna Stroud file a complaint with the
9 Department of Education?

10 A: No, she did not.

11 Q: And did Anna Stroud file a lawsuit?

12 A: No.

13 Q: Brooke Clinton, did Brooke Clinton file an EEOC
14 complaint?

15 A: No.

16 Q: Did Brooke Clinton complain to any of
17 governmental entity?

18 A: No.

19 Q: Did Brooke Clinton file a complaint to the
20 Department of Education?

21 A: No.

22 Q: And did Brooke Clinton file a lawsuit?

23 A: No.

24 Q: And I hope -- went on such a roll.

25 **MS. POLVI:** Did I go through the five? Did I do all



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1 five?

2 **COURT REPORTER:** Uh-huh.

3 Q: Okay. So accurate to say just a summation,
4 make sure I asked all the right questions, all
5 five grievants who filed this grievance, once
6 they ousted Dr. Slayman from her position, did
7 not take a single other action, did they?

8 A: None.

9 Q: Thank you.

10 **MS. JAMES - RECROSS-EXAMINATION BY MR. WINBURN:**

11 Q: Quick follow-up. Did Dr. Angela Bain file a
12 lawsuit against the board chair?

13 A: We're not here to discuss her, and I'm not
14 gonna discuss it.

15 Q: I'm here to ask you that question. I want to
16 know about the litigious nature of Chester
17 County. Did Angela Bain file a lawsuit against
18 the board chair?

19 A: I am not gonna answer that.

20 Q: Okay. Well, we'll allow judicial notice of the
21 lawsuit. Did Dr. Slayman file a lawsuit
22 against the board or members of the board,
23 former members of the board in connection with
24 this case?

25 A: Not with this case; no.



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1 Q: Oh, okay. All right. I don't have any further
2 questions.

3 MS. POLVI: Thank you for your time, Ms. James.

4 (Witness excused.)

5 (A recess was taken.)

6 CALLIE McCONNELL, having been duly sworn, testifies
7 as follows:

8 HEARING OFFICER: All right. Ms. Polvi.

9 MS. POLVI: Thank you.

10 MS. McCONNELL - DIRECT EXAMINATION BY MS. POLVI:

11 Q: So I'll be asking you some questions, and we'll
12 kind of start with background, a little bit
13 about you, your employment history, things of
14 that sort. Who is your current employer?

15 A: Chester County School District.

16 Q: How long have you been employed there?

17 A: Actually since 1976 as employed by the school
18 district.

19 Q: And in what role or roles have you performed?

20 A: I was at the high school. I was at Chester
21 High School for three years. And I've worked
22 there as a teacher's assistant. And from there
23 in 1979, I came to the district office. At
24 that time, I was the -- I came as the secretary
25 to the assistant superintendent for



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1 instruction. And I was that for a year. And
2 my boss at that time was Mrs. Sue Cantrell.
3 She was there in that position for one year.
4 And then we got a new superintendent, who was
5 Mr. Ed Lavenhouse [ph]. And she was, you know,
6 kind of released under him. And then I became
7 the district receptionist and backup secretary
8 to his personal secretary. And I was that for
9 seven years. And then when his personal
10 secretary left, then I rolled into that
11 position in 1987. And I've been the secretary
12 to the superintendent since 1987.

13 Q: That's a long, long time period.

14 A: Yeah. 31 years as a superintendent secretary.

15 Q: And physically, where is your office located
16 within the district office?

17 A: Okay. My office is adjacent to the
18 superintendent's office.

19 Q: And with regard to the superintendent's office,
20 fair to say that because of the position that
21 you hold and the geographic location, you are
22 closely interacting with the superintendent on
23 a daily basis?

24 A: Yes.

25 Q: How would you describe an average day in your



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1 work place in terms of the day-to-day
2 activities that you perform?

3 A: Okay. An average day, it's -- well, I'm
4 dealing not only with the superintendent, but
5 I also am dealing with the public as well. So
6 it's just a regular work day. I mean, I
7 wouldn't find anything, you know, abnormal or
8 anything. It's just a regular work day.

9 Q: And during the time frame that Dr. Slayman was
10 the superintendent of Chester County School
11 District, did you work with her during her
12 entire tenure as superintendent?

13 A: Yes.

14 Q: And how would you describe your interactions
15 with Dr. Slayman?

16 A: I thought they were very good. You know, my
17 office, as I said, is adjacent to hers. And,
18 you know, she and I, we communicated. And
19 whatever, you know, she needed, I would provide
20 it or and ...

21 Q: And with regard to, I guess, communications
22 style, how would you describe Dr. Slayman's
23 communication style?

24 A: I thought she communicated well. She, I mean,
25 you know, to me, from what I'm -- what I was



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1 exposed to, she communicated well. And, you
2 know, she just had a good attitude, from what
3 I saw. You know, and whatever -- if she needed
4 work done, you know, she would come. She would
5 ask, you know, and I just -- well, in fact, I
6 just enjoyed working for her. I would put it
7 that way. I think we had a good rapport.

8 Q: And during your 31 years in the -- or actually
9 even more, is it the years that you worked in
10 the district office, how many superintendents
11 do you think worked during that time period?

12 A: I had -- let's see. I've had -- technically,
13 I've had eight superintendents, and then I've
14 had, I think, two superintendents to be
15 interims. But they were superintendents
16 because let's see. It was -- yeah,
17 Dr. McDaniels and Mr. Taylor, yeah. And so in
18 all and all, I had really ten superintendents,
19 and then I've had interims with exception of
20 the two that were superintendents. I've had
21 four interims that were not superintendents,
22 but they were maybe assistant superintendents,
23 acting superintendents. Yeah.

24 Q: And how would you describe Dr. Slayman's
25 performance and just capacity as a



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1 superintendent in comparison to the other ten
2 or so that you've worked with?

3 A: Well, you know, each one has a different way of
4 doing things, and I've learned a lot from each.
5 And I thought, you know, that Dr. Slayman, she
6 was really -- she's very knowledgeable about
7 the job that was to be done. She was careful
8 about the children, you know. She wanted the
9 best for the children. And actually I felt,
10 you know, she was really putting us on the map,
11 'cause Chester was so small, you know. But and
12 she was bringing a lot of the technology. She
13 brought a lot of that into play. She made it
14 so that the students could get access to
15 tablets, computers, you know. And as I say,
16 you know, she was good with the children, the
17 parents, you know. She always tried to -- if
18 parents had problems, she would try to work
19 them out, you know. I thought she did an
20 exceptional job, and I'm just gon' be frank
21 with you.

22 Q: And with the -- I'll transition a little bit in
23 terms of asking you about interactions that you
24 observed. With regard to the senior staff that
25 worked with Dr. Slayman while she was



1 superintendent, how would you describe what you
2 observed of her interactions with them?

3 A: Well, I don't really know. I -- as far as I
4 know, you know, from what I've seen, they would
5 have their senior staff meetings. And, you
6 know, she was open with them. And but now,
7 sometime, you know, like if it's something
8 confidential where, yeah, they would close the
9 door, you know, if they had something
10 confidential. And but other than that, I
11 thought everything was fine I thought until I
12 learned differently.

13 Q: And that's a perfect segue for kind of what --
14 when did you first become aware that something
15 different was being alleged?

16 A: I would say maybe about a month or two before
17 all of this stuff -- all these things that went
18 down. I mean, I really was surprised when I
19 found out that the board were looking at
20 actions against her and they were, you know,
21 really trying to put stuff together, 'cause
22 they were asking me and I'm saying, huh-uh, I
23 don't see any of this stuff.

24 Q: And who did you tell that to, that you weren't
25 seeing anything of what was being alleged?



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- 1 A: Well, they were gonna have -- they had a
2 5:00 o'clock -- the board had a 5:00 o'clock
3 call meeting one day. And well, the board
4 chair was telling me that it was a whole lot of
5 stuff going. And I told her, I said, well, I
6 didn't know anything about it. She said, well,
7 it's a whole lot going on, and we have to look
8 into it. And then they had that meeting. That
9 was a special-called meeting.
10 And then like maybe within the week or so, then
11 the lady who was the public information
12 officer, she was telling me about all these
13 things that, you know, it was just the
14 atmosphere was just horrible. And I told
15 her -- and then but she did tell me -- I said,
16 well, I don't see any of that. And she said,
17 well, no 'cause she's scared of you. I said,
18 scared of me? I'm not an ogre. I mean, and so
19 and but and then she said -- and she was kind
20 of crying -- this was the PIO.
21 Q: Brooke Clinton?
22 A: Oh, yeah. Yeah.
23 Q: But go ahead and continue. I just wanted to
24 verify?
25 A: But -- yeah, but that was it. And then



1 because, as I say, I never knew that it was
2 really like kind of disguised, I'm assuming.
3 Because I never knew that they were, you know,
4 saying that, you know, all these things. I
5 didn't know.

6 Q: And did anyone ask you to provide testimony
7 essentially adverse to Dr. Slayman?

8 A: Say that one more time?

9 Q: Did anyone ask you to say negative things about
10 Dr. Slayman.

11 A: No, huh-uh.

12 Q: And when Brooke Clinton was speaking with you
13 about the testimony you just referenced, give
14 us a little more context. Was that something
15 she approached you or you approached her?

16 A: No. She came -- we were standing in the
17 doorway. She came -- well, yeah. She came to
18 my door. Yeah. She came in to my door. And
19 we were standing in the doorway and, you know,
20 she was kind of teary-eyed like, and she was
21 saying that ...

22 Q: And other than making kind of the generality
23 statement, well, did she give you any specifics
24 as to why she was saying she was upset?

25 A: Huh-uh, he didn't give me any specifics.



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1 Q: Based on your observations, was there any
2 hostile work environment when you were around
3 from Dr. Slayman to her senior cabinet?

4 A: I never saw it. I'll put it that way. I'll
5 never -- I never saw it. And I thought
6 everything was cordial. I really -- I thought
7 the atmosphere but, you know.

8 Q: So when the grievance was filed and Dr. Slayman
9 was not there, would it be accurate to say that
10 you were surprised?

11 A: Yeah.

12 Q: And based on your observations, do you think
13 Dr. Slayman was surprised?

14 A: She probably was. I know she was.

15 Q: And prior to Brooke Clinton coming to you
16 around the time frame of the grievance being
17 filed, had anyone else ever come to you, senior
18 staff or otherwise, to make any concern about
19 Dr. Slayman?

20 A: Huh-uh.

21 Q: I'm sorry. For the record?

22 A: No. I'm sorry. No.

23 Q: It's natural. I'm not being rude when I remind
24 you. It's that we just want to make sure
25 Cortney can put it all down in writing.



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1 A: Okay.

2 Q: With regard to Dr. Slayman's office door, would
3 you describe her door more frequently open or
4 more frequently closed?

5 A: Open. It was open.

6 Q: Did you ever hear Dr. Slayman yell at anybody?

7 A: I never heard, huh-uh.

8 Q: How would you describe what you observed of
9 Dr. Slayman's interactions with district
10 employees, as a whole?

11 A: District employees, I would -- very good. And
12 you know, we had -- we would have like in our
13 office like would have like little social get-
14 togethers, you know, kind of like keep the
15 atmosphere, you know, positive. Dr. Slayman,
16 she was -- you know, participated in it and
17 everybody else. I say I thought it was a
18 cordial atmosphere. And I did, truthfully.

19 Q: With the ---

20 **MS. POLVI:** Mr. Winburn, do mind if I borrow this
21 just 'cause you already have it out?

22 **MR. WINBURN:** No, no, no. Have at it.

23 **MS. POLVI:** Thank you.

24 **MR. WINBURN:** It's the court reporter's.

25 Q: This is Petitioner's Exhibit 8 in the record.



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1 It is the grievance that's filed September 8th,
2 2015, from five senior cabinet members to
3 Mrs. Lawson, the board chair. Did you ever see
4 this document?

5 A: I've never seen this.

6 Q: Okay. And the document, I'm just gonna ask you
7 about some follow-ups with the first sentence.
8 It says, We are formally filing an official
9 grievance due to a hostile work environment,
10 implications of ethical violations, and racial
11 and threatening remarks by Dr. Slayman. I want
12 to kind of break it down piece by piece of each
13 of those. Did you ever observe Dr. Slayman
14 giving a hostile work environment to any of
15 these five people?

16 A: I -- huh-uh. I ---

17 MS. POLVI: Excuse me.

18 A: No.

19 Q: And did you ever observe any implications of
20 ethical violations in general or with regard to
21 these five people?

22 A: No.

23 Q: And did you ever observe Dr. Slayman using
24 racial or threatening remarks?

25 A: No. Not at all.



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1 Q: Is there anything that comes to your mind as to
2 why these five individuals would sign a
3 grievance with regard to Dr. Slayman?

4 A: No, I can't, unless it was just -- I don't want
5 to -- unless it is a "coup." I guess that's
6 the word I want to say, because of the fact
7 that I never observed her, you know -- any of
8 that, what, racial, threatening -- and what
9 else was it? -- unethical. 'Cause I never
10 observed any of that.

11 Q: Some of the individuals talked about being
12 under a great deal of stress. Did you observe
13 the senior cabinet being in any type of stress
14 that would have been different than those --
15 anybody in those roles during your, give or
16 take, 40 years at the district office?

17 A: Huh-uh. The -- from what I saw, it was no
18 different from what, you know, anybody else has
19 done.

20 Q: And are those types of jobs, meaning jobs like
21 yours, the senior cabinet, Dr. Slayman, are
22 those naturally stressful jobs in a school
23 district environment?

24 A: I -- well, I'll say maybe the superintendent's
25 because of the fact that if anybody else screws



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1 up, then the superintendent is the one that
2 takes that load. But, you know, in the jobs,
3 if you're -- if you know your job and -- you'll
4 know how to do it, and it wouldn't be that much
5 stressful for you. You know what I'm saying?
6 If you're not -- if you don't really know how
7 to do something, yeah, it could be stressful.

8 Q: Okay.

9 A: Be stressful to you.

10 Q: And did you observe any staff members having
11 health issues that you think could be
12 ~~attributable in any way to Dr. Slayman?~~

13 A: Not to my knowledge.

14 Q: Prior to this grievance coming into existence,
15 what was the mood of the senior staff when you
16 interacted with them?

17 A: There again, you know, I couldn't detect
18 anything. I couldn't detect anything. But
19 then, you know, I might be naive, but I didn't
20 detect anything.

21 Q: But on that front, I mean, you were working
22 there every day?

23 A: Yes.

24 Q: And in order to for someone to come to
25 Dr. Slayman's office, they'd have to come



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1 through you?

2 A: Come through. Yeah, that's right.

3 Q: And there's some kind of question about, I
4 think, some kind of reference to like a green
5 mile, something I think maybe Mr. King or
6 Mr. Gardner testified -- Dr. King or
7 Mr. Gardner testified to, walking the green
8 mile to go and talk with Dr. Slayman. Did you
9 ever hear anything called that?

10 A: Huh-uh.

11 **THE WITNESS:** Excuse me.

12 A: No, no.

13 Q: And there was some kind of indication about,
14 you know, Dr. Slayman like kind of calling
15 someone's name out. Did you ever hear her kind
16 of say like, hey, Jeff, come see me? Did you
17 see -- you ever hear something like that?

18 A: No. 'cause he was way around -- his office is
19 way around there (indicating). I wouldn't
20 heard her call him. Now, she and I, just
21 like -- our room is -- my room is here and hers
22 like there's the doorway (indicating). And,
23 you know she may say, well, Callie, can you
24 come and get this or, you know, Callie, where
25 I can find that? And I was, you know -- we



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1 talked back and forth. But as for hearing
2 her -- somebody way on the other side, no,
3 huh-uh.

4 Q: So fair to say that Dr. Slayman could not have
5 called down to Mr. Gardner in order to kind of
6 beckon him to her office?

7 A: No.

8 Q: And I'll kind of use the example of my office,
9 for instance. I've got where mine's located in
10 my office, there's kind of four other people's
11 offices in close enough distance where if I
12 kind of called out ---

13 A: Right --

14 Q: --- hey, Paul, can I -- can you -- can I talk
15 to you real quick? He'd probably hear me. Did
16 that kind of interaction happen at the district
17 office where the people who are within a normal
18 distance from each other sometimes call out to
19 say, hey, can I talk to you?

20 A: Well, like the only people that were in close
21 proximity to her ---

22 Q: Uh-huh.

23 A: --- would have been me. And now, Brooke
24 Clinton, she had -- to the front side, she had
25 an office (indicating). But our office were,



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1 you know -- we were the only ones there close
2 by.

3 Q: And that makes sense.

4 A: Is this what's making sense (indicating)? She
5 and I had -- our offices were like here and,
6 you know (indicating).

7 Q: And it's even helpful for -- we can even make
8 it an exhibit if we need, but kind of -- you
9 can feel free ---

10 A: Okay.

11 Q: --- to kind of show it out kind of how you are
12 describing it.

13 A: See now, you would walk into my office this
14 way. Okay. And then there's a wall, a slight
15 wall there. And then and you would go into in
16 the superintendent's office. My desk sits
17 here; her desk was there.

18 Q: Go ahead and label -- go ahead and write out my
19 desk and her desk, you know, superintendent's
20 desk.

21 A: Okay.

22 Q: And then if don't mind, just doing kind of the
23 hallway. And then show us where the other
24 folk's offices are.

25 A: Okay.



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1 Q: Kind of in relation to what you're depicting.

2 A: Okay. Now, this is the way our offices were.
3 But there was a little -- let's see. There was
4 a restroom area, and then there was an area
5 there like where Brooke's office would have
6 been. Maybe I should do it this way.

7 Q: But kind of through a wall over a door?

8 A: Maybe I should do it this way because see it
9 was like a hall. Like a hallway this way. And
10 this would have been the restroom, and this
11 would have been Brooke's office. And maybe I
12 ~~should take that -- we might need another sheet~~
13 of paper.

14 Q: No problem. There you go. We'll just scratch
15 this one. You would still have it for
16 reference.

17 A: Okay. All right. Say this is the hall area
18 here. And then you had a restroom and then
19 there's Brooke's office. Okay. And then my
20 office and the superintendent's office. And
21 this is my entrance. My desk was back here.
22 It's this little wall partition like. And then
23 there's a open space that led into her office.
24 And but now, this space here, there was a door
25 that, you know ---



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1 Q: Could be closed if necessary?

2 A: Could be closed, yeah. Could be closed. But
3 most of the time, you know, it was left open.
4 And this was her desk back here (indicating).
5 Let's see. Callie. Let's see. Okay. Now,
6 and then she did have a little back door there,
7 but that was -- she kept that closed. That was
8 the back door.

9 Q: And that actually exits the building?

10 A: Yeah. And she can go right there and go
11 outside the building, exit the building. Okay.
12 But actually you could -- she could only like
13 enter through my area to go into that way.
14 And, you know, since we were so close, we
15 didn't have like no intercom. So we, you know,
16 can just talk -- yeah, back and forth.

17 Q: And go ahead while you still have the picture.

18 A: Okay. Then go up the hall here and go up the
19 hall here (indicating). And then Mr. Gardner,
20 his office would have been here (indicating).
21 And I'll make this little area here,
22 secretary's -- there was some secretary desks
23 here (indicating). And then there was
24 another -- let's see. Yeah. There's another
25 little office here. And the other little



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1 office here. But this is the part of the part
2 where we were in. This is pretty much the
3 layout that goes on up.

4 Q: And Dr. King and Anna Stroud and Shawn Williams
5 would all be even further down the hall, right?

6 A: Yeah. Now, Dr. King would have been here
7 (indicating). K-I-N ...

8 And let's see, and Anna would have been here
9 (indicating). Okay. Anna would have been
10 there (indicating).

11 Q: And but Shawn Williams?

12 A: Now, Shawn was over in the other part. See,
13 you know how our building is? It's in parts.
14 And she was over on the other, which to me is
15 somewhat almost like a satellite world because
16 they are over on that side. And, you know, we
17 are over on this side. But, no, she's not on
18 this side. Because, see, you have like -- you
19 had some offices here, here, here (indicating).
20 Then you have the reception area. And then
21 this other part goes over, and Shawn was over
22 in this other part (indicating).

23 Q: And when someone typically entered
24 Dr. Slayman's office, they weren't coming from
25 the exit; they'd come around through the



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1 reception through you, right?

2 A: Yes. That was -- yeah, then we were coming in,
3 uh-huh.

4 Q: Thank you. And just so that it's with the
5 depiction on the record, can we make this an
6 exhibit?

7 **MR. WINBURN:** No objection.

8 **HEARING OFFICER:** So let's see. That would be
9 Exhibit Number ...

10 **COURT REPORTER:** 26.

11 Q: Exhibit 26. I guess we can do a sticker
12 but ...

13 **(Respondent's Exhibit Number 26 was marked for**
14 **identification purposes.)**

15 Q: And feel free if you need to reference it
16 again. But that way it's in the record just to
17 kind of be along with your testimony about it.

18 A: I'm just sorry I couldn't draw very well.

19 Q: I'm no art major either. It's okay. There's
20 some testimony about fear, intimidation. Did
21 you ever see Dr. Slayman act in a manner that
22 would instill fear or instant ---

23 A: No.

24 Q: --- intimidation?

25 A: No.



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1 Q: And not with the senior staff when you were
2 present?

3 A: Not when I was present, no.

4 Q: Did you ever hear Dr. Slayman make anything,
5 you know, verbal statementswise that you think
6 would be threatening of nature?

7 A: No.

8 Q: Do you think Dr. Slayman ever, you know,
9 treated you with hostility?

10 A: No. We had good rapport.

11 Q: And just for the record on the tone, you were
12 ~~pretty emphatic when you said that, right?~~

13 A: Yes. Yes.

14 Q: And did Dr. Slayman ever treat you in any
15 manner that you felt was disrespectful?

16 A: No.

17 Q: With regard to Dr. Slayman, fair to say that
18 she was your direct supervisor when she was
19 superintendent?

20 A: Yes.

21 Q: And any time that you needed time off, did she
22 give that to you?

23 A: Yes.

24 Q: And did you ever hear her question anyone
25 else's time off?



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1 A: No. I never heard it.

2 Q: Did you ever feel ostracized or in any way kind
3 of left out because you didn't sign on to this
4 grievance?

5 A: No. Not really. Well, they knew not to ask me
6 'cause I didn't have nothing to grieve about.
7 So but, no, huh-uh.

8 Q: Were you present when the grievants with a T-S
9 the, grievants, the individuals, they testified
10 about meeting together. Did you ever observe
11 when they met together?

12 A: Well, yeah. Sometimes they would meet in
13 Dr. King's office.

14 Q: About how many times did you observe that they
15 met as a group in that manner in Dr. King's
16 office with Dr. Slayman not present?

17 A: I don't know. Maybe two, three times.

18 Q: And were those close in time to around when
19 this grievance was filed in end of August,
20 beginning of September 2015?

21 A: Yeah.

22 Q: Was the door closed when they were in the --
23 that meeting?

24 A: Yeah, yeah.

25 Q: Meetings. Did any of the school staff or other



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1 staff at the district office ever say anything
2 negative about Dr. Slayman to you?

3 A: Not to me.

4 Q: One of the kind of questions that's arisen is
5 about whether, you know, Dr. Slayman was open
6 to hearing the advice of her senior cabinet,
7 you know, leaders within the district. Did you
8 observe whether she listened to the advice of
9 other people other than, you know, her own
10 personal opinion on things?

11 A: What do you mean, like getting advice?

12 Q: Right.

13 A: I don't think so. I -- huh-uh.

14 Q: So ---

15 A: No. I don't think so.

16 Q: Did she ever, like, seek your advice or opinion
17 on things?

18 A: No.

19 Q: And with regard to the senior cabinet meetings,
20 those would have been kind of separate ---

21 A: Right.

22 Q: --- in their own closed-door environment?

23 A: Well, like I say, the only time -- if they were
24 gonna close the door is like if they were --
25 maybe something confidential or something. But



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1 other than that, the doors would be open. And
2 they were kind of like strategizing.

3 Q: Well, and to that point, when the door was open
4 and you heard strategizing, that was more than
5 just Dr. Slayman strategizing? That was other
6 people inputting?

7 A: Yeah.

8 Q: So people were allowed to give their opinions?

9 A: Yeah.

10 Q: There's been some references kind of within the
11 record that you may or may not be privy to, but
12 references to the Defender security being put
13 in place rather than the sheriff's office
14 officers being the school resource officers.

15 A: Uh-huh.

16 Q: Can you tell us what you recall about that kind
17 of transition? Was that a contentious
18 decision?

19 A: No. Now, I know about Defender. They came and
20 made their presentation. But the part with the
21 sheriff, he -- I don't know how to say. He
22 wanted to take over the things. He wanted to
23 come in, and he wanted officers and everything
24 in the school as opposed to the Defender group.
25 But the Defender people, they -- you know, they



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1 came in. They made their presentation and
2 everything, what they offered. And so, you
3 know, we decided to go with them. And it was
4 agreed upon the board.

5 Q: All right. And with that, what kind of -- do
6 you remember of the interactions around it?
7 Did the -- well, let me scratch that. I'll --
8 so I don't give you a compound question. Let
9 me refocus it a little bit more narrowly. Did
10 you hear any of the senior cabinet express
11 opinions that they didn't want Defender in
12 place or private security instead of the
13 sheriff's office?

14 A: They didn't express it around me.

15 Q: Were you ever present when Dr. Hughes was
16 relaying his opinion about the hiring of a
17 private security at the schools?

18 A: No. Because they would have discussed that in
19 executive session.

20 Q: And in your role, do you typically attend the
21 board meetings, exclusive of the executive
22 session?

23 A: Yeah, yeah. I attend all of them. Actually,
24 I'm the board clerk too.

25 Q: And how long have you performed that role?



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1 A: Ever since I've been the superintendent's
2 secretary; 1987.

3 Q: So if anybody knows the school district, it's
4 you?

5 A: Some.

6 Q: With regard to the senior staff, let's talk
7 about this time frame of September 2015.
8 Dr. Slayman goes on vacation. She's out of the
9 office. Describe for us what was happening in
10 the office when Dr. Slayman wasn't there, she's
11 on vacation, this grievance is filed.

12 A: Well, it's pretty much the same, you know.
13 They -- as I say, you know, they kind of like
14 went to lunch together, the senior staff. And,
15 you know, I'll say this: A lot of the stuff
16 that was done, it kind of circumvented me, you
17 know. I was kind of like excluded from any of
18 this stuff. They would go together, go to, you
19 know, lunch together. They would -- and, you
20 know, I told you about sometime that they would
21 meet in Dr. King's office. And they just --
22 well, it was -- I don't know. It was just a
23 time. It was not a good time.. Because after
24 I found out what was going on, it was -- I
25 don't think -- but, you know, the operation



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1 continued. The operation was going on as
2 usual. But so I don't know.

3 Q: Based on what you observed with their
4 closed-doored meetings, going to lunch, did you
5 think some kind of plan was in place?

6 MR. WINBURN: Objection. It's calling ---

7 A: No.

8 MR. WINBURN: Calls for speculation.

9 HEARING OFFICER: If it's within your personal
10 knowledge, you can testify to it.

11 THE WITNESS: Okay.

12 A: --- Ask it again? ---

13 Q: Sure. Based on your observations of the senior
14 staff having some closed-door meetings in
15 Dr. King's office, going to lunch together
16 around this time, did that make you conclude
17 that some plan was in place?

18 A: It might be off the record but, yeah, it did
19 make me. Because if there was -- if I have to
20 say, it was just like there was some kind of
21 espionage, some kind of like spy stuff going
22 on. It was just, you know -- it was crazy.
23 So, yeah, from my observation and, you know, it
24 is what it is.

25 Q: When you observed the senior cabinet during



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1 this time frame of kind of the start of that
2 2015-2016 school year, did you see them
3 smiling, acting normal?

4 A: Everything I thought was in place, yeah. They
5 was acting normal I was think -- I thought up
6 until like I say -- it was like really end of
7 September. Like, that was the month because we
8 had convocation that August, and everything --
9 looked like everything was just, I mean -- just
10 on the up and up. And then the next thing I
11 heard was, you know, all of this had come
12 about.

13 Q: And with the district office, I understand some
14 people might kind of stagger and not all start
15 on the exact same day, but when was everybody,
16 for the most part, back from summer vacation
17 and really working in the district office?

18 A: Well, everybody, you know -- like the summer
19 was over, so everybody -- like, convocation in
20 August, so everybody would have been back at
21 full time at work.

22 Q: And it seemed normal at that start?

23 A: Yeah.

24 Q: I'm -- well, let me preface. Did you ever read
25 the Bagley report when it was published in the



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1 media?

2 A: I read it, huh-uh.

3 Q: What was your opinion of it when you read it,
4 knowing you know, your personal experiences in
5 the district office?

6 A: I thought a lot of it was untruthful. I saw
7 some statements by some people that I did not
8 see go into the room. Because I forgot to put
9 that part. My office is here, and our
10 executive board room is here (indicating). And
11 that's where the -- yeah, I forgot.

12 ~~Q: -- Feel free, if you want to update it? --~~

13 A: Okay. This is the executive board room and
14 this is where they were (indicating). This is
15 where the people were going in talking to her
16 (indicating). And from ---

17 Q: And "her" being Betty Bagley?

18 A: Yes. And -- oh, and when I read the
19 information in the paper, I said, well, now I
20 never saw those people go in. I never saw them
21 going into the office, into the board room.

22 Q: And you referenced that -- and I'm
23 paraphrasing, but I think you said that you
24 felt a lot of it was untruthful. What were
25 some of the things that struck you as being



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1 untruthful?

2 A: She had in there something about the racial
3 part, the racist and about threatening remarks.
4 And I was -- because I couldn't see her as
5 being somebody racist because she had too many
6 minorities or African American people working
7 for her. She hired more African American
8 people into administrative positions than any
9 of the other superintendents that I've known
10 of. And so the racist part, I couldn't see
11 that. The threatening part, 'cause like I say,
12 I never heard any threat -- as a matter of
13 fact, I never heard anybody say that she had
14 threatened them. I had never heard that.
15 And what was the other part? I don't know.
16 But those two, they kind of like stood out to
17 me.

18 Q: And did you meet with Ms. Betty Bagley as well?

19 A: Yes. She interviewed me for about -- I'd say
20 about five minutes. I guess I wasn't saying
21 what she wanted to hear, because the others,
22 they were in there for about 30 and 45 minutes.
23 But she was so ...

24 Q: And during the -- would you describe that
25 meeting as brief?



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1 A: Talking about with me?

2 Q: Right.

3 A: Very brief.

4 Q: And that brief meeting, what did you tell
5 Ms. Bagley -- well, I guess let's start with:
6 What did she ask you about?

7 A: Well now, you know, that's been a good minute,
8 so I don't remember exactly but -- I can't
9 remember exactly what all she asked. But I
10 know that I told her that I thought Dr. Slayman
11 was, you know -- she did an exception -- well,
12 ~~job and I thought she was putting us on the map~~
13 because, you know, she had gone to Washington
14 she -- for that superintendent's conference
15 with the President and everything like that.
16 And I was, you know, when she was -- I told her
17 I didn't see anything that she had done that
18 was -- that I felt uncomfortable with. And but
19 I don't remember exactly all, but it lasted
20 about I would say ten minutes at the maximum,
21 maybe eight. But she didn't keep me in there
22 no longer.

23 Q: And how would you describe her receptiveness to
24 when you were saying positive things about
25 Dr. Slayman?



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- 1 A: Well, she was just listening. And then after
2 a while, then she said, well, okay. She said,
3 well, I thank you for your comments. And then,
4 you know. But she was listening, you know.
5 She wasn't really questioning, you know, why
6 did I -- had this feelings.
- 7 Q: And with -- when you read the Bagley report
8 later once it was published in the media, did
9 you see the positive comments that you relayed
10 included in that report?
- 11 A: No. I didn't see anything -- everything that
12 I saw was negative.
- 13 Q: Fair to say that the statements you made were
14 excluded from the report?
- 15 A: Excluded, right.
- 16 Q: Did that concern you?
- 17 A: Well, yeah. Well, I just told her everything
18 that I had the interview, but she didn't have
19 anything down there about what I said so ...
- 20 Q: And you mentioned in your testimony that you
21 are the clerk to the board ---
- 22 A: Yes.
- 23 Q: --- as well?
- 24 A: Yes.
- 25 Q: And that you've held that job for more than 30

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1 years?

2 A: 31.

3 Q: 31 years. And describe, you know -- goodness
4 gracious, you've been in, I guess, who knows
5 how many board meetings those 31 years, but
6 quite a few. How is the normal board meeting
7 structured in terms of does the superintendent
8 communicate the majority of the report to the
9 board and then some supplemental reports from
10 the different senior cabinet leaders?

11 A: Yes. Now, what -- there was a like a board
12 ~~brief, board update or something to let the~~
13 board -- you know, to keep the board informed.

14 Q: And does the board meeting typically follow the
15 meeting outlined that's established beforehand?

16 A: Now, what do you mean outlined? You mean like
17 our agenda that we send out?

18 Q: Right.

19 A: Yeah. It follows the agenda.

20 Q: And did you ever see Dr. Slayman tell any of
21 the senior cabinet they weren't allowed to talk
22 to the board?

23 A: No.

24 Q: There was information released from the board
25 meetings to the media. Do you know who



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1 released that information?

2 A: Huh-uh. Concerning?

3 Q: Dr. Slayman?

4 A: No, I don't.

5 Q: Okay. Before Dr. Hughes served on the board,
6 did you ever hear any of the executives session
7 information being put to the public?

8 A: No. And the -- this might be -- I know I might
9 be saying something that I'm -- you're not
10 asking me, but it looks like -- it looked like
11 when Dr. Hughes came on the board that January,
12 it's just like the atmosphere just changed. It
13 was just different. Because before that, it
14 was like the meetings were cordial. But
15 then -- and that January when he came on, it
16 looked like, you know, everything was just --
17 I don't know, like it was contention. It
18 was -- the atmosphere just changed. I'll put
19 it that way.

20 Q: Once Dr. Slayman was on vacation and not in the
21 office but had not yet resigned from the
22 position, was the information that was being
23 shared accurate, based on what you observed in
24 terms of the negative things that were being
25 said about her?



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1 A: I -- no. Tell me that again. What are you --
2 let me hear that again? What are you asking?
3 Q: The negative information that was being said
4 about Dr. Slayman ---
5 A: Right.
6 Q: --- and was being discussed kind of this time
7 frame between September 8th, 2015, and ---
8 A: And all out in the community and all that kind
9 of stuff?
10 Q: Right.
11 A: Okay.
12 Q: Was that truthful to the best of what you
13 observed in the office? Was that negative
14 information truthful about Dr. Slayman?
15 A: No. You know it's ---
16 Q: Just want to make sure it's on the record.
17 A: No, no.
18 Q: But and you're pretty emphatic, it's -- just so
19 that it's clear on the record in terms of your
20 response to that question?
21 A: Right.
22 Q: There was some question about Dr. Slayman's --
23 she went on a trip to Idaho. Do you remember
24 that?
25 A: Yeah.



1 Q: And do you remember her kind of commenting
2 about it? Do you remember the context of what
3 we said about the trip?

4 A: No. She just said it was a nice trip. But
5 that -- that's all that I recall. And it had
6 something to do with the technology too, you
7 know. Microsoft, we were getting involved with
8 that.

9 Q: When Dr. Slayman was on that trip to Idaho, did
10 you observe whether the senior cabinet was
11 meeting together as a group during that time?

12 A: I can't remember. And if so, y'all, they could
13 have met over in the other part too without my
14 knowing it.

15 Q: Were you aware of Jeff Gardner wanting to be
16 superintendent?

17 A: He had come for an interview. That was before
18 we had moved into our office where we are now.

19 Q: And what do you know about that?

20 A: Not much, only that he interviewed at -- I
21 don't think he had the credentials to be a
22 superintendent. I don't know this, but he was
23 a principal at Chester High School.

24 Q: Were you aware of Dr. King ever saying that he
25 wanted to be superintendent?



1 A: No. I've never heard him say it. But now he
2 did serve as acting superintendent when
3 Dr. Slayman stepped down.

4 Q: And about how long was that time period?

5 A: Three weeks.

6 Q: Do you know -- well, let's backtrack. Is --
7 who put Dr. King in that acting superintendent
8 role for those three weeks?

9 A: Ms. Lawson, the board chair.

10 Q: And during those three weeks where Dr. King was
11 acting as superintendent, did he move like
12 himself, his -- workingwise out of his office --
13 down the hall to where the superintendent's
14 office was?

15 A: No. He never moved in. But like
16 correspondence, he would get me to, you know,
17 write it for him and then sign it as he was
18 acting superintendent.

19 Q: So to follow up on that, Dr. King did, you
20 know, act in terms of actually taking actions
21 or letterhead as acting superintendent?

22 A: Yeah, yeah.

23 Q: When, if you recall -- and you might not
24 remember the exact date, but do you remember
25 around what day Dr. King started in that



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1 capacity as acting superintendent?

2 A: No. But I do, you know -- Ms. Lawson wrote a
3 letter and, you know. So the date would be on
4 the letter. I just can't remember putting him
5 in that capacity.

6 Q: And I want to ask you a little bit more about
7 Anna Stroud. Do you remember what action was
8 taken with regard to Anna Stroud's salary?

9 A: Anna, well, at one point, the board had frozen
10 her salary. But I don't know. Somewhere along
11 the way, hers got unfrozen. I -- you know, I
12 don't ever recollect, you know, when it was
13 unfrozen, but -- and I don't know if she
14 unfroze it or whom. I don't know.

15 Q: In terms of that she did ultimately get pay
16 raises even after the board had voted to freeze
17 her salary?

18 A: Yeah.

19 Q: Okay. Were you -- was it known kind of within
20 the office that Mr. Stroud, Mrs. Stroud's
21 husband, worked with the sheriff's office?

22 A: Yep.

23 Q: And describe for us kind of that connection,
24 you know, in terms of their -- you know, did he
25 come to the district office from time to time,



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1 anything like that?

2 A: Well, yeah sometimes he would. But, you know,
3 he also worked in one of the schools. I'm not
4 sure which one. I'm not sure if it was one of
5 the Great Falls or one of the Louisville
6 Elementary Schools. You know, I'm not really
7 sure. But he did something in the school
8 district as well as being sheriff's -- with the
9 sheriff's department. Or with law enforcement,
10 I'll put it that way.

11 Q: Did you ever observe Dr. Slayman discuss any,
12 ~~you know, sensitive personnel information that~~
13 she shouldn't have with any inappropriate
14 person?

15 A: No.

16 Q: And this will kind of take you off a different
17 track in terms of my next couple of questions.
18 But were you aware that Dr. Slayman has a
19 concealed weapons permit?

20 A: No. I didn't know.

21 Q: If Dr. Slayman had a concealed weapons permit,
22 does that mean she's any kind of threat to
23 anybody?

24 A: I wouldn't think so. I wouldn't think so.

25 Q: Lots of people in South Carolina have them?



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1 A: That's true.

2 Q: I don't.

3 A: Even some -- I don't either, but you have some
4 preachers that have them so ... But, no, I ...

5 Q: And I think you testified to this earlier in
6 your testimony, but do you believe that
7 Dr. Slayman cared about the employees and the
8 students of Chester County School District?

9 A: I do.

10 Q: And considering that you helped prepare the
11 board agenda every board meeting and you were
12 present at all of the board meetings, give or
13 take, you know through the last 31 years and
14 including the ones that Dr. Slayman was the
15 superintendent, did you ever observe her
16 mislead the board in any kind of way?

17 A: No.

18 Q: Just want to ask you. There was -- there's the
19 incident involving a cheerleading coach with a
20 parent and a student at Chester High School
21 that's somewhat relevant to why we're here, so
22 I want to ask you if you have any personal
23 knowledge about that. Do you remember that
24 involving the former cheerleading coach and a
25 parent and a student at Chester High School?



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1 A: I do.

2 Q: Tell us about that, what you remember.

3 A: Well, it kind of stemmed around the sheriff.
4 And this parent had called Dr. Slayman to
5 report that the coach -- the -- well, and she
6 really was not an employee of the district.
7 But, you know, she was a coach for the
8 cheerleaders. She wanted her to -- wanted the
9 parent's daughter to cover for her while she
10 met up with the sheriff. And so she came --
11 the mom was disturbed about it, and she came
12 and she met with Dr. Slayman. And she had a
13 written statement, and I still have the
14 parent's statement. You know, and they -- and
15 so, you know, from what I've gathered, you
16 know, the coach resigned. She just resigned.

17 Q: And the -- to preface back on the complaint
18 from the parent is that the coach asked the
19 student to cover when there was a romantic
20 rendezvous?

21 MR. WINBURN: It's hearsay.

22 THE WITNESS: Well, it might be hearsay, but that's
23 what the mom said.

24 MR. WINBURN: I'm sorry. Do you have the statement?

25 THE WITNESS: Yeah. I've got the -- yeah. And I



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1 still have the letter.

2 **MR. WINBURN:** Okay.

3 **MS. POLVI:** And the door was opened with regard to
4 the other -- the grievants testifying to
5 Dr. King and Mr. Gardner about it.

6 **MR. WINBURN:** Not as to hearsay, it wasn't.

7 **HEARING OFFICER:** I'm to going allow it.

8 Q: With regard to the parent's complaint, when you
9 saw it, did you think it was concerning?

10 A: Uh-huh, yes.

11 Q: And do you think it was legitimate for
12 Dr. Slayman to follow up on that parent's
13 concern?

14 A: Well, yeah. Well, you know, just to find out
15 if it were so, because, you know, people can
16 make accusations.

17 Q: And did -- were you present when Dr. Slayman
18 talked with Dr. King and Mr. Gardner about it?

19 A: No.

20 Q: I think I've covered most of the information
21 that I wanted to cover, but this is the time
22 where if there's something I haven't asked you
23 about. Is there anything important that you
24 think Ms. Pike needs to know with regard to the
25 potential discipline that's been lodged upon



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