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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 VI

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1 Dr. Slayman's license?

2 A: Well, as I said from what I've seen, you know,
3 I thought it was a good superintendent. I
4 thought she cared for the students. She --
5 and, you know, she tried to -- with the
6 community, she tried to interact with the
7 community. And, you know, I thought as a
8 superintendent and as an individual, I thought
9 she was very good. Yeah. And she did her job
10 well. And to my knowledge, I didn't know of
11 any complaints until when that came up, that --
12 ~~during that August -- September leading up to~~
13 that.

14 Q: Thank you. And now Mr. Winburn, he's an
15 attorney with the Department of Education. He
16 has the opportunity to ask you questions and
17 then Mr. Pike, our hearing officer.

18 A: Okay.

19 Q: And I may have follow-up.

20 A: Okay.

21 **MS. McCONNELL - CROSS-EXAMINATION BY MR. WINBURN:**

22 Q: Hey, Ms. McConnell, my name's Scott Winburn.

23 A: Yes.

24 Q: I'm a lawyer with the Department. I appreciate
25 you being here today. I will tell you that we



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1 have a lady in our office, and I want to put it
2 on the record Noelle Redd has been here, I
3 think, 30-something years ---

4 A: Wow.

5 Q: --- and she has been through numerous
6 superintendents and numerous general counsels'
7 office staff, so I can at least identify with
8 the value that you bring to the district and
9 the important role that you play. I certainly
10 never want to disappoint Noelle. So, with that
11 being said on the record -- and I will present
12 it to Noelle if we ever get a transcript.
13 I wanted to ask you a couple of questions about
14 this case. I understood your testimony that
15 you were -- is it fair to say that you were not
16 privy to all the meetings, all of the senior
17 staff meetings?

18 A: Well, you know, like I say, our office, it's
19 adjacent to each other. The door would be
20 open. But then, you know, if they were gonna
21 say something, you know. And that's typical.
22 I imagine that's what you would do if you
23 didn't want ---

24 Q: Sure, sure. So these -- but the senior staff
25 meetings, would you be an -- would you be a



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1 regular attendee of those meetings where the
2 senior staff was meeting, whether it be, you
3 know, in Dr. Slayman's office or a more formal
4 weekly meeting or whatever, would you attend
5 those?

6 A: No.

7 Q: Okay.

8 A: Not -- and with none of my superintendents.
9 I -- you know, I didn't attend ---

10 Q: Right.

11 A: --- the senior staff meetings.

12 Q: Right.

13 A: Uh-huh.

14 Q: Okay. And I think your testimony is pretty
15 clear on the, you know, let's say, your
16 discussion with Ms. Betty Bagley.

17 A: Yeah.

18 Q: Is it also fair to say that you told her I've
19 never seen any or heard any threats being made
20 by Dr. Slayman?

21 A: It's fair to say, yes.

22 Q: Okay. All right. So I wanted to make sure
23 that was discussed with Ms. Bagley.

24 A: Uh-huh.

25 Q: Or that you told her that during that



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1 interview. I didn't it -- I didn't want there
2 to be any confusion that that issue never came
3 up. I mean, in other words, you at some point
4 you told her ---

5 A: That ---

6 Q: --- I've not been -- I'm not aware of any
7 threats or racist remarks?

8 A: Right.

9 Q: Okay. Now, you did mention -- you were asked
10 specifically about Idaho and the trip. And I
11 believe your testimony was that you recall a
12 specific discussion about some sort of
13 technology?

14 A: Yeah. Well, you know, at that time. There's
15 Microsoft and everything. Yeah, she was going
16 to conferences. Yeah.

17 Q: That was part of the reason for the conference
18 was to review some sort of ---

19 A: Yeah.

20 Q: --- technology to be maybe implemented in the
21 school to use; is that right?

22 A: Right.

23 Q: All right. Do you remember her making any
24 statement about diversity or using the word
25 "diversity"?



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1 A: No, I don't remember that.

2 Q: Okay. Now, you also mentioned the word "coup"?

3 A: Yeah.

4 Q: Yeah.

5 A: That's what it appeared to be. Go ahead. I'm
6 sorry.

7 Q: No, no. That's fine. That's fine. I think
8 we've heard the word "mutiny." I think of
9 Mutiny on the Bounty and Captain Bligh. And
10 we'll use maybe another term. How about
11 "regime change"? That's -- well, any of those

12 ~~three words may apply. Question is: Are any~~
13 of the five individuals who filed the
14 grievance, are they with the District now?

15 A: No. Well, I take that back. Mr. ---

16 Q: I'm sorry. I didn't mean to trick you.

17 A: Gardner.

18 Q: Mr. Gardner.

19 A: Yeah.

20 Q: Yes.

21 A: He came back. And he -- you know, he was a
22 part of the cabinet since Dr. Bain's been here.
23 Then he retired. His TERI ran out, but he came
24 back. And he's working now as a teacher at the
25 career center, Chester County Career Center.



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- 1 Q: He's a paid instructor?
- 2 A: Uh-huh.
- 3 Q: Okay. But other than that -- and how -- in
- 4 general, how long did any of those individuals
- 5 stay on with the District after Dr. Slayman
- 6 resigned?
- 7 A: Not long 'cause they was dropping like flies.
- 8 Q: Okay. You would agree that generally speaking,
- 9 a coup ---
- 10 A: Is a takeover.
- 11 Q: And it implies that the folks that are being
- 12 take -- that are doing the takeover gain in
- 13 some way and become in power.
- 14 A: They start that.
- 15 Q: Right. Okay. But are you saying that any of
- 16 the individuals that filed the grievance gain
- 17 power in this case with Chester County School
- 18 District?
- 19 A: No. But the -- Dr. King was a temporary acting
- 20 superintendent.
- 21 Q: Right. And he was voted temporarily to become
- 22 that temporary? Was that a vote?
- 23 A: No. That was an appointment by the chair.
- 24 Q: For three weeks?
- 25 A: Well, I think the rationale -- I know you want



1 to say this is hearsay.

2 Q: No, no. I'm asking ---

3 A: But these are my thoughts is that he was going
4 to roll on into the position of superintendent.

5 Q: Right. But to be clear, he had already failed
6 at that attempt, correct, in applying for ---

7 A: Not King.

8 Q: No, ma'am. In -- he applied at the same time
9 Dr. Slayman applied, is that fair?

10 A: Well, see, I didn't know that.

11 **MS. POLVI:** Jeff Gardner. That was Jeff.

12 ~~A: -- Jeff Gardner, yeah. ---~~

13 Q: Oh, okay. I'm sorry. I'm mistaken then.

14 A: Yeah.

15 Q: Jeff Gardner did that?

16 A: Yeah.

17 Q: Okay. But he never was -- Keith Callicutt came
18 on and he became the interim?

19 A: Right.

20 Q: And then Dr. Bain became the interim --
21 ultimately became the full-time superintendent?

22 A: The superintendent, right.

23 Q: Now, been some question about the
24 superintendent and location of offices. Would
25 you -- would the superintendent, would



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1 Dr. Slayman ask you to go and get Charles or
2 Dr. King and Mr. Gardner from time to time to,
3 like, bring him -- bring them back to her
4 office for some discussion?

5 A: Well, I -- yeah, I would go. I could have
6 called, but I get up and walk. Because you get
7 blood clots if you sit too long.

8 Q: Right.

9 A: So, yeah, I would walk around to their office.

10 Q: At any time would you have come into their
11 office and say you've been summoned?

12 A: I might have said, oh -- I say you're summoned.
13 But, I mean, you know. I'm a carefree person,
14 not meaning that it was ---

15 Q: Yeah, sure, sure.

16 A: So and but I guess some people -- I don't know.

17 Q: Now, is it your testimony that Dr. Slayman
18 never called out Charles?

19 A: No. Not to my knowledge.

20 Q: Never. That that's your testimony, that she
21 never called Charles?

22 A: That's my testimony.

23 Q: All right. And is it your testimony also that
24 she never ever called Jeff Gardner?

25 A: Not to my knowledge.



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- 1 Q: I mean, is that a -- I'm sorry. Is that a ---
- 2 A: No. She's never. Right.
- 3 Q: Okay.
- 4 A: Yeah, that's correct.
- 5 Q: Okay. But you're not familiar with them -- the
- 6 green mile, as you were asked earlier?
- 7 A: Yeah. I don't know anything about a green
- 8 mile. That's my first hearing about the green
- 9 mile.
- 10 Q: Now, were you all -- were you -- did you walk
- 11 around the school, or were you always at your
- 12 desk? -- Did you go to lunch? -- Were you there
- 13 24/7? Can you describe your normal day?
- 14 A: ~~Yeah, I would go to lunch. I take an hour~~
- 15 lunch break.
- 16 Q: Okay.
- 17 A: And I leave the -- I would leave the premises.
- 18 Q: Now, as secretary -- I'm sorry. I'm missing
- 19 the word. Not secretary of the board, or
- 20 counsel -- clerk to the board?
- 21 A: Clerk, uh-huh.
- 22 Q: You interacted with the board quite a bit?
- 23 A: Yes.
- 24 Q: Every -- all the time?
- 25 A: Yeah. But you know now, they don't have

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1 offices at the ---

2 Q: Sure. Understood.

3 A: So and if, like, in the instance, like, if
4 Ms. Lawson want a letter or something written
5 or something, she'd either send it to me and
6 ask me to put it on letterhead, or she would,
7 you know, dictate it to me.

8 Q: Right.

9 A: And but now that's the only one that I would do
10 correspondence for.

11 Q: It fair to say between you and Dr. Slayman or
12 you and other superintendents, other than the
13 superintendent, you had the most direct contact
14 with the board, and you have had that for the
15 last ---

16 A: Supposedly.

17 Q: For the least 37 years?

18 A: Yeah. I can't guarantee, but I'm supposed to
19 be the only one have direct ---

20 Q: Understood. Did you ever tell or advise
21 Dr. Slayman about Mr. Hughes and how he would
22 want to circumvent the process?

23 A: No.

24 Q: Did you ever hear Dr. Slayman say anything
25 negative at all about the sheriff?



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1 A: No.

2 Q: Now, can you tell me when was the last time you
3 spoke to other witnesses about this case or
4 Ms. Polvi?

5 A: Not -- I -- this my first time seeing
6 Ms. Polvi. I don't -- I've never spoken to
7 Ms. Polvi. And I haven't spoken to anybody.
8 Because nobody knew that I was coming here
9 today to testify.

10 Q: Right.

11 A: So I just took a professional day.

12 Q: You are still with the district, correct?

13 A: Yes, I am.

14 Q: You know, you mentioned -- you testified that
15 you thought there was a conspiracy going on?

16 A: Yeah. I said coup but ---

17 Q: Well, right. Yeah. I'm sorry. I'm not trying
18 to change the word on you. Did you ever
19 raise -- if you had those suspicions at that
20 time, did you ever raise them with Dr. Slayman?

21 A: But remember, I told you I did not pick up on
22 that until it was like in that September time.

23 Q: Okay. Kind of after ---

24 A: Yeah.

25 Q: When this all came out?



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- 1 A: Yeah, yeah. That's when I detected.
- 2 Q: Understood. And it's not a test. I'm just
3 trying to get the facts.
- 4 A: It's okay. Go ahead.
- 5 Q: How were the -- how was Shawn Williams to work
6 with? Was she good to work with?
- 7 A: I guess. I don't know. Because remember,
8 she's way over on this other side.
- 9 Q: Right.
- 10 A: So ...
- 11 Q: How about Dr. King?
- 12 A: I guess Dr. King was okay.
- 13 Q: How about ---
- 14 A: The three weeks, you know, that he filled in,
15 he was okay.
- 16 Q: And I'm -- well, that -- but before that when
17 he was part of the cabinet, he and Jeff
18 Gardner, were they pretty good to work with?
- 19 A: Yeah.
- 20 Q: And had you observed them as being hard
21 workers?
- 22 A: No, I didn't observe that.
- 23 Q: Would you say ---
- 24 A: They were kind of laid back.
- 25 Q: You though they were slack?

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1 A: I didn't say that. I said but they were kind
2 of laid back? I didn't -- but I didn't say ---

3 Q: I'm laid back. Yeah. All right. How about
4 Brooke Clinton? What do you think about her?
5 You think ...

6 A: Brooke was -- Brooke was Brooke. I don't know.
7 I -- she was PIO and, you know, she -- I don't
8 know. I think she was just putting a lot of
9 stuff in the community.

10 Q: Do you think that these individuals who filed
11 this grievance, you think they just made it up?

12 A: Well, I can't say. I don't know. But from
13 what I see -- what I saw, you know, like I
14 said, a lot of the stuff to me that I read, it
15 just didn't seem factual.

16 Q: Is it fair to say you didn't see it?

17 A: Right. That -- you're right.

18 Q: Okay. You're not saying that you think they
19 made it up? You just don't really -- you're
20 just here to?

21 A: You remember I told it was like it was a lot of
22 espionage going on?

23 Q: Yes, ma'am.

24 A: It was like you had spies all over the
25 building.



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1 Q: Right.

2 A: You had -- it was -- and this is where I -- but
3 this is where I pick up on it. Because it was
4 like things was just -- I mean, you know, they
5 was just like they was just trying to find
6 stuff. It was like -- and then if I were to --
7 like, say if they were in the break room. And
8 if I would walk in, if they were people
9 talking, they would stop talking, you know.

10 Q: Have you ever heard of the breakfast club in --
11 I think it's in Chester County. Is it
12 Louisville; is that right? You ever heard of
13 the breakfast club?

14 A: Not really. What ---

15 Q: Are you aware of whether Dr. Slayman would
16 attend a group -- a sort of a breakfast group?

17 A: Oh, well, she would have breakfast -- yeah
18 at -- what was it?

19 Q: Country Omelet?

20 A: Country Omelet, yeah. But know it was called
21 a breakfast club.

22 Q: How often would she eat there; do you know?

23 A: No, I can't recall.

24 Q: Did she come back and -- come into the office
25 and say I've been at the Country Omelet. I'm



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1 sorry. I'm five minutes late. Anything like
2 that?

3 A: Well, she'll let me know, you know, if she was
4 there. And I know -- yeah. I don't remember
5 her actually being late as such. But she would
6 say, you know, yeah, I had breakfast at the
7 Country Omelet.

8 Q: And that would happen fairly often, based on
9 what you remember? Not the lateness but the
10 attendance.

11 A: Yeah. But maybe once a month or so or
12 ~~something like that. Now, it wasn't no weekly~~
13 thing that I know of.

14 Q: ~~Did you ever draft documents for Dr. Slayman?~~

15 A: Say this one more time?

16 Q: Did you ever draft documents on your computer
17 for Dr. Slayman?

18 A: Yeah.

19 Q: Did you ever ---

20 A: And mysteriously, you know, they want to say
21 something was wrong with my computer, so they
22 came and took my computer. And, you know, went
23 well, we got to -- whatever it is --
24 reconfigure or whatever they said. So and that
25 was another reason why I think it was



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1 espionage, spying going on. Because they knew
2 that I had information from the superintendent.
3 And so they -- because my computer would only
4 be the only one in the district that would --
5 I mean, our district office that always would
6 have to go into IT.

7 Q: Backing up just a minute, how about Jean Ligon?
8 Did you work with her?

9 A: The only way I deal with Jeannie is that the
10 school board, they had assigned hearing
11 officers. So the hearing officers, when they
12 get ---

13 Q: Expulsions?

14 A: Yeah. And I have to set all that up. And
15 that's the way I would communicate with
16 Jeannie ---

17 Q: Okay.

18 A: --- by sending her whenever children are
19 recommended, I would send her that information.

20 Q: Right. Now, she pretty good to work with?
21 She's testified in this case already. She
22 pretty good to work with?

23 A: Actually, I really don't know, because she's
24 over in this other part over here where ---

25 Q: How long had Ms. Ligon been there?



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1 A: Let's see, gracious me. I'm trying to think.
2 But she's -- let's see it was Dr. Linda. She
3 probably -- she's probably been in that
4 position -- I don't know -- more than ten
5 years, I know. More than ten. Maybe ...

6 Q: You don't have any reason to question her
7 honesty, do you?

8 A: I don't -- I don't really have that much
9 communication with Jeannie other than sending
10 her, you know, information about children.
11 Because of some children, they, you know, they
12 are referred, but some of their offenses might
13 be related to their handicapping condition.

14 Q: All right.

15 A: So their disabilities. So that's why I'll send
16 her the whatever, the students when I'm
17 scheduling hearings.

18 Q: Uh-huh.

19 A: And, you know, and she'll get back. If it's
20 something that the child has done that's
21 related to that child's disability, now, she
22 would call me back and tell me well, we can't
23 have this hearing because of, you know,
24 that's -- the offenses related to his handicap.
25 But other than that, that's the only kind of



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1 communication I'd have with Jeannie.

2 Q: Okay. And you testified that Brooke Clinton
3 indicated to you that Dr. Slayman was scared of
4 you; is that right?

5 A: That's what she told me. 'Cause she ---

6 Q: Okay.

7 A: But this was -- you remember I told you that
8 they had that special meeting, that
9 5:00 o'clock meeting that day the ---

10 Q: Yes, ma'am.

11 A: --- school board. And then like the next day
12 when she was -- came and was telling me about
13 all these things Dr. Slayman done. I said,
14 well -- and have a meeting -- I said, huh-uh,
15 I hadn't seen that. I said, well -- and she
16 said, well, she's scared of you. And I said,
17 why? I'm not an ogre.

18 Q: Now, I would agree with you there. And just to
19 be clear, have you spoken to any other
20 witnesses that have testified in this case
21 already about this case?

22 A: No. I don't know who has testified.

23 Q: Have you spoken to anybody else -- have you --
24 had you spoken to anybody about this case in
25 the last few weeks?



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1 A: No.

2 Q: All right. That's all I have. Thank you.

3 **HEARING OFFICER:** I've got a couple of questions for
4 you.

5 **THE WITNESS:** Okay.

6 **MS. McCONNELL - EXAMINATION BY THE HEARING OFFICER:**

7 **HEARING OFFICER:** I get the layout of the building.
8 So when Dr. Slayman's door was closed, could
9 you ever hear anything through that doorway?
10 Like, if their voices were raised ---

11 A: No.

12 **HEARING OFFICER:** ---- would you have heard it? ----

13 A: If voices are raised, yeah, I could have heard
14 it. But I never heard any raised voices.

15 **HEARING OFFICER:** But did they ever talk loud enough
16 that you could hear a little bit through that
17 door?

18 A: Huh-uh.

19 **HEARING OFFICER:** Okay.

20 **MS. POLVI:** I'm sorry. Verbal for the record.

21 A: Excuse me. No. I'm sorry.

22 Q: But it was possible? I mean, her room was not
23 sound proofed in any way, was it?

24 A: Oh, no, huh-uh.

25 Q: So if they had had raised voices, would you



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1 have ---

2 A: I would have heard, yes.

3 Q: You would have heard it?

4 A: Yes. Even if they were -- if it was several

5 voices or if it were one voice, I would have

6 heard.

7 Q: Okay. Did you ever hear angry voices in her

8 office?

9 A: I never heard, huh-uh -- no.

10 Q: Okay. Please feel free to tell me you don't

11 know the answer to this, if you don't know.

12 A: Okay.

13 Q: Okay? I'm just fishing for answers.

14 A: Okay.

15 Q: What would Brooke Clinton ---

16 A: Uh-huh.

17 Q: --- have to gain out of Dr. Slayman leaving?

18 A: I don't know.

19 Q: Okay. Do you have any idea what Shawn Williams

20 would have to gain if Dr.-- by Dr. Slayman

21 leaving?

22 A: I have no idea. She -- I don't know. Maybe

23 she thought -- well, both -- maybe they thought

24 they were gon' get some other position. I have

25 no idea.



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1 Q: Were Brooke Clinton and Shawn Williams and Jeff
2 Gardner and Dr. King and Anna Stroud, were they
3 all close friends with one another?

4 A: You know, when folk leave the office, you know,
5 people can come together without -- and see I
6 wouldn't have known. They may have. And
7 evidently for them to come together the way
8 they did, they must have had some kind of
9 friendship. They had to have something for all
10 of them to ...

11 Q: Do you consider yourself as having your ear
12 down-to-the-ground?

13 A: What do you mean like trying to eavesdrop?

14 Q: No. No, not at all.

15 A: Oh.

16 Q: I just meant are you someone that people would
17 normally come and talk to and tell things to,
18 sort of what I fondly call the street committee
19 where people might come and tell you things
20 because they trust you and they ---

21 A: No. I don't ---

22 Q: They don't tell you what's going on around the
23 office?

24 A: And I can tell you the reason that they don't
25 is because they know that I'm in close



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1 proximity, or they know that I'm that
2 secretary. So stuff circumvents me because
3 they feel as though whatever they're saying, I
4 would tell it back to the superintendent.

5 Q: I see.

6 A: So and it's always been that way because they
7 know that I have close relation and so ...

8 Q: In all your years of being there, and I won't
9 ask you who, but did you ever get the feeling
10 that any other superintendent was not well
11 liked by the staff?

12 A: No. Not really. We may have had the one that
13 came prior to Dr. Slayman because they
14 probably -- but nobody ever said anything to
15 me. But they just, you know. He was
16 different.

17 Q: Was Dr. Slayman the first female superintendent
18 that you had had?

19 A: Yes.

20 Q: Before Dr. Slayman -- let me rephrase that --
21 When the people in the district office learned
22 that Dr. Slayman was going to be filling the
23 superintendent's position, did you observe any
24 attitudes about having a woman in that
25 position?



1 A: I did not. I did not. And when Dr. Slayman
2 came on, you see a lot of people all these
3 people that you're mostly talking about,
4 these ---

5 Q: The five?

6 A: Yeah. I think with exception of Anna and maybe
7 Shawn -- let me see. Yeah, maybe Shawn. But
8 Brooke -- oh, and Mr.-- no. Gardner was there.
9 Gardner and King and Brooke, they came on when
10 Dr. Slayman came on so ...

11 Q: Meaning that Dr. Slayman hired them?

12 ~~A: -- Yeah. -- She brought them on-board. --~~

13 Q: Okay.

14 ~~A: -- But so, you know, everybody -- at the time when~~
15 she was hired, to my knowledge everybody was in
16 agreement. They were well receptive of having
17 a female as superintendent.

18 Q: And once again, this is within your knowledge.
19 And if you don't have knowledge, feel free to
20 tell me that. Was there any frustration with
21 Brooke Clinton's work, or did -- was there any
22 frustration with her being the public
23 information officer?

24 A: Not to my knowledge. But as I say, it was just
25 like stuff was just getting into the community.



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1 And I'm assuming, because she was in the
2 cabinet meetings, that she had all that
3 information. And I don't know.

4 Q: Can you tell me what you mean by stuff was
5 getting into the community? Was it getting
6 into the newspaper?

7 A: I mean, we had a whole lot of people in the
8 community. They really -- it was unreal.
9 Stuff was leaking out. I remember one time
10 there was going to be a meeting. This was
11 during the September time. And it was gonna --
12 it was a special-called meeting, and I was
13 supposed to send out the agenda to the media
14 notifying them. I was supposed to do it at
15 3:00 o'clock. But at 1:00 o'clock, people out
16 there in the community had it. They were -- it
17 was just like whatever went on in the district
18 office, it was already out there. They already
19 knew.

20 And then you had like residents in the city,
21 they had got ahold to it. They were, I mean,
22 just -- I mean, it was awful. So my thinking
23 now -- and I don't want to blame Brooke. I
24 don't know. But by her being the public
25 information officer, she would have had, you



1 know, not -- she would have had -- privy to the
2 information. She may have put it out there.
3 I don't know. But it was getting out. I don't
4 know. But information was just getting out.
5 And I know that didn't answer your question,
6 did it?

7 Q: No. It did answer my question. Have you lived
8 in Chester all of your life?

9 A: Yes.

10 Q: You know, Ms. McConnell, I come from a small
11 town. And I used to say, as much to my regret,
12 ~~that I could do nothing that my father did not~~
13 find out about. In Chester, if you had some
14 ~~huge problem, with the superintendent like she~~
15 was hostile, she was ---

16 A: But see, none of that came out until this stuff
17 here.

18 Q: I understand. But if that were the case, let's
19 just assume for just a moment that it were, do
20 you think people in the community would have
21 known that? Or do you think ---

22 A: They ---

23 Q: Do you think it would have gotten out?

24 A: If she were hostile, I think that it would
25 have. I think it would have, you know. But as



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1 I say, this stuff did not -- it just went rapid
2 [sic] from that probably like the latter part
3 of August and all that September. All that's
4 been -- it was unreal. That was just -- it was
5 just unreal.

6 Q: So let's go back to the first that you heard of
7 this, okay?

8 A: Uh-huh.

9 Q: Tell me again how you first heard about it.
10 How did you know learn all of a sudden that
11 your boss -- that there were all these
12 allegations about your boss?

13 A: It's when they had -- when the board met that
14 5:00 o'clock meeting.

15 Q: And you were present at the 5:00 o'clock
16 meeting?

17 A: Yeah. But see, it was in executive session, so
18 I couldn't go in.

19 Q: Oh, I see.

20 A: Yeah.

21 Q: Okay.

22 A: And, you know, then -- well, Ms. Lawson, she
23 had told me. She said, you know, this was
24 something that had to be done. But ---

25 Q: But she didn't tell you what it was?



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1 A: No. 'Cause see, I was not knowledgeable of it.
2 And that was -- you know I told you about
3 Brooke. It was the next, and she was talking
4 about how she was, you know, being -- Slayman
5 was all mean and everything. And but when
6 Ms. Bagley -- and I guess they were meeting at
7 that time so that they can get Ms. Bagley to
8 come, I'm assuming. I'm not sure how they
9 worked. But then that's when I started finding
10 out all of this stuff.

11 Q: Were you present in the meeting when the five
12 individuals presented their claims to counsel?

13 A: Huh-uh, no.

14 Q: That was in executive session?

15 A: Yeah.

16 Q: Okay. Okay. I think that's all the questions
17 I have. Please answer any follow-up questions
18 that either Ms. Polvi or Mr. Winburn have.

19 **MS. McCONNELL - REDIRECT EXAMINATION BY MS. POLVI:**

20 Q: Just for the follow up. Is to your knowledge,
21 did Dr. Hughes meet with school staff in after
22 hours and by himself around this time frame of
23 the grievance?

24 A: I don't know.

25 Q: And are Rick Hughes, Dr. Rick Hughes and Denise



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1 Lawson friends, based on what you've observed
2 of their interaction?

3 A: Yeah.

4 Q: Did they think seem pretty close with one
5 another?

6 A: They did.

7 Q: And based on what you observed at board
8 meetings and district office, did Dr. Hughes
9 and Ms. Lawson seem of an accord in terms of in
10 agreement how they were going to approach this
11 grievance?

12 A: They -- yeah. They, did seem like they were in
13 agreement.

14 Q: I want to follow up a little about the computer
15 testimony that you provided with regard to
16 someone taking your computer.

17 A: Uh-huh. The IT.

18 Q: How many times did that happen?

19 A: Well, I think it was two times. And then I had
20 one recently. So that's why I'm trying to
21 gauge so ... But I'm thinking it was two times
22 when Dr. Slayman was the superintendent.

23 Q: And that was during the time frame that she was
24 kind of on vacation, this grievance time at
25 issue?



1 A: No. These was beforehand. This was before
2 that.

3 Q: And what did -- what kind of alarmed you about
4 that? What -- how was that different than in
5 the past?

6 A: Well, like I said, you know, like it was
7 always -- it would be something would be wrong
8 with my hard drive that they'd have to come and
9 get it. And sometimes they to reimage it.

10 Q: And were even having any computer problems at
11 the time?

12 A: No.

13 Q: So this was someone proactively making changes
14 to your computer not at your request?

15 A: Yeah. And you know, and the reason I kind of
16 threw it out there because see, like I have
17 like a lot of documents and like I have scanned
18 documents. And then like when they would take
19 my computer, one of those scanned documents,
20 which -- and I didn't know how -- I should have
21 had -- put them on one of those -- what do you
22 call them? -- ZIP files or whatever. But see,
23 those scanned documents, they're gone. I don't
24 have them anymore. So ---

25 Q: So when your computer was returned to you, it



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1 was missing material that was on it when it
2 left you?

3 A: Right. I wouldn't have it. Or they'd bring me
4 another one. They'd bring me a different one.

5 Q: That had -- that didn't have to same ---

6 A: Right.

7 Q: --- content?

8 A: Right.

9 Q: Okay. And who were the people involved with
10 that, at least that directly spoke with you
11 about it?

12 A: Well, Neil Rollins, he's the IT director. And,
13 you know, he would say that it had to be
14 reimaged.

15 Q: Did you question him about the missing scanned
16 documents?

17 A: No.

18 Q: Were you apprehensive to do so?

19 A: Not really. I, you know, I just assumed I
20 said, well, I guess they're looking for
21 information on my computer.

22 Q: Fair enough. Those are all my questions.

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

24 Q: I have a few follow-ups just for maybe some
25 perspective. Is it fair to say that Chester



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1 County School District remains in the news for
2 various reasons even today?

3 A: Yeah. They was in there today.

4 Q: As I understand it, for example, the newspaper
5 is asked -- has sent a FOIA for all of
6 Dr. Bain's e-mails?

7 A: Uh-huh.

8 Q: Is that right?

9 A: Uh-huh.

10 Q: And the ---

11 A: Excuse me. Yes.

12 Q: -- Yes, ma'am. -- And the response as I understand
13 it -- you may or may not know this, but it's
14 been reported that the response from Dr. Bain
15 is that'll be \$29,000 for her e-mails. Is that
16 your understanding?

17 A: Yes.

18 Q: Okay. So right now as we speak, there is
19 ongoing controversy of a sort with the current
20 superintendent in Chester, and there is news
21 being reported about those controversies; is
22 that fair to say?

23 A: Yes.

24 Q: Okay. Yes, ma'am?

25 A: Okay. But then see the rational is all those



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1 e-mails and, you know, your tech person or
2 whomever would have to extract the e-mails ---

3 Q: Yes, ma'am.

4 A: --- you had to pay them by the hour. And you
5 had to redact certain information. But now,
6 after Dr. Bain met with the reporter, she asked
7 him what specifically he was wanting ---

8 Q: Right.

9 A: --- then he told her. So then they got that
10 part out, and it didn't cost \$29,000.

11 Q: Right. And, again -- well, and Dr. Bain --
12 Dr. Slayman has responded to a FOIA. It's in
13 some of the documents where she did turn over
14 information pursuant to FOIA.

15 A: Uh-huh.

16 Q: Correct?

17 A: Uh-huh. Excuse me, yes.

18 Q: No, I just want to point out that, you know,
19 respectfully, this information about the
20 hostile work environment came out. That's why
21 we're here, right?

22 A: Uh-huh.

23 Q: And there wasn't ---

24 A: Yes.

25 Q: That's all right. It wasn't -- in your mind,



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1 was there some huge delay between the time
2 Dr. Slayman came on board and these allegations
3 arising? I mean, how would you describe it?
4 Do you think it just all of a sudden? Well,
5 how would you describe it?

6 A: That's the way it appeared to me. Because as
7 I had said before, it looked like we had a
8 wonder working environment. We'd have
9 get-togethers, you know, and Dr. Slayman
10 participated. It just seemed like it was
11 great. And then, as I said, that January ---

12 Q: Right.

13 A: That January those few months down, it looked
14 like everything changed.

15 Q: Right. And that's what I wanted to ask you
16 about.

17 A: Yeah.

18 Q: 'Cause you've testified ---

19 A: Okay.

20 Q: --- from January to the Bagley report?

21 A: Yeah, right. Right.

22 Q: Yes, ma'am. Oh, and one other follow-up. When
23 you were saying that these individuals would go
24 to lunch, did any of the secretaries go with
25 them?



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1 A: Oh, no.

2 Q: Okay. So this is senior staff going out?

3 A: Yeah, yeah.

4 Q: Okay.

5 **MS. McCONNELL - EXAMINATION BY THE HEARING OFFICER:**

6 **HEARING OFFICER:** I have just have one follow-up
7 question.

8 A: Okay.

9 **HEARING OFFICER:** Let me make sure I understood what
10 you said. What you -- about the computer being
11 taken.

12 A: Right.

13 **HEARING OFFICER:** So you, as far as you knew, were
14 not experiencing any difficulties with your
15 computer at all? You thought it was perfectly
16 fine; is that accurate?

17 A: I didn't have any complaints.

18 **HEARING OFFICER:** And so an IT guy just shows up and
19 says ---

20 A: Yeah. Like -- well, they're saying that he was
21 gon' change it out, swap it out. And so -- and
22 then he said they had to reimage mine. So they
23 would give me a different computer each time.

24 **HEARING OFFICER:** Was it an upgraded computer or a
25 newer computer?



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1 A: Yeah. It would be a newer. But all of my
2 information from the previous one ...

3 **HEARING OFFICER:** I see. And those scanned
4 documents, just in general terms, what would
5 those scanned documents have dealt with that
6 you didn't get back?

7 A: It could have been any number of things. It
8 could have been let's see. What would I've
9 had. Could have been letters, you know, that
10 were scanned. And when scanned, they would
11 have been sent -- could have been letters sent
12 here to the State Department.

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

14 A: ~~Because -- but they -- they would have been on~~
15 my hard drive. But they would have been
16 scanned to go elsewhere.

17 **HEARING OFFICER:** So when Dr. Callicutt was there,
18 you were his administrative assistant as well?

19 A: Yes.

20 **HEARING OFFICER:** So you ended up having to draft a
21 letter that went to ---

22 A: I did not. I found out about it, but I did
23 not -- I did not draft the letter.

24 **HEARING OFFICER:** So he did not give it to you to
25 do?



1 A: No.

2 **HEARING OFFICER:** So you didn't refuse to do it; you
3 just -- you didn't do it?

4 A: I never had it, huh-uh.

5 **HEARING OFFICER:** He didn't give it to you to do?

6 A: That's right.

7 **HEARING OFFICER:** Do you know who he gave it to?

8 A: I don't.

9 **HEARING OFFICER:** So you ---

10 A: Unless someone in HR. I don't know. But it
11 wasn't me.

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

13 A: You're welcome.

14 **MS. POLVI:** Just one brief follow-up.

15 **MS. McCONNELL - REDIRECT EXAMINATION BY MS. POLVI:**

16 Q: On that thread, with regard to superintendent
17 correspondence, when Dr. Slayman was
18 superintendent, you essentially were -- kind of
19 the processes is that all, you know,
20 correspondence went through you first and then
21 it went to Dr. Slayman; is that right?

22 A: Right. I would see it supposedly, you know.
23 I open the -- is that what you mean? I would
24 open it and date stamp it.

25 Q: Right. And with regard to Anna Stroud, if



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1 there was any FMLA paperwork, that would have
2 gone through HR and not through the
3 superintendent's office; would that be
4 accurate?

5 A: I think the superintendent would have had to
6 sign off on it.

7 Q: Did you ever see that paperwork with regard to
8 Anna Stroud?

9 A: I never saw it.

10 Q: So no FMLA paperwork came through your way?

11 A: I didn't see it.

12 Q: Okay. -- Thank you. ---

13 **MS. McCONNELL - EXAMINATION BY THE HEARING OFFICER:**

14 ~~HEARING OFFICER:~~ Would --- when Dr. Slayman was
15 there, if she wrote a letter that pertained to
16 an employee, would that have gone through
17 you ---

18 A: Yeah. Now, if she ---

19 **HEARING OFFICER:** --- or would she have sent that
20 through HR?

21 A: She -- no. She would sent that to me. And,
22 you know, I would have typed it.

23 **HEARING OFFICER:** And then you would have forwarded
24 it on to HR eventually?

25 A: If it were something dealing with an employee,



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1 yeah. They would have got a copy.

2 **HEARING OFFICER:** Okay.

3 A: And that would -- you know, you make your
4 notations at the bottom of the letter, you
5 know, CC personnel file or, uh-huh.

6 **HEARING OFFICER:** Okay. But personnel wouldn't have
7 written a letter on behalf of Dr. Slayman.
8 Whenever you were there, you would have written
9 that letter?

10 A: I would have written it, yeah.

11 **HEARING OFFICER:** That would have been the normal
12 protocol; would that be correct?

13 A: That's -- yeah, that's protocol.

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

15 **MS. McCONNELL - RECROSS-EXAMINATION BY MR. WINBURN:**

16 Q: Ms. McConnell, are you aware that the letter
17 sent by Dr. Callicutt, Shawn Williams was
18 actually copied and so was y'all's attorney,
19 Allison Hanna?

20 A: No. I didn't do that.

21 Q: All right. So at this time ---

22 A: And I don't use that kind of letterhead.

23 Q: Okay. Are you aware that, by law,
24 Dr. Callicutt had to report this to us?

25 **MS. POLVI:** Object to the form. That's an issue of



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1 that case, but I would object to that
2 conclusion being made. I mean, that's very
3 arguable.

4 **MR. WINBURN:** She's -- y'all been asking her a whole
5 bunch of questions about this letter and
6 imaging of a computer. And I don't want to get
7 too far field but ---

8 **MS. POLVI:** I'm fine if you rephrase it, but
9 you're ---

10 **Q:** Are you aware ---

11 **HEARING OFFICER:** Sustained.

12 **Q:** ~~Is it your testimony that the no~~
13 superintendent ever sent out correspondence
14 ~~without sending it through you in 31 years?~~

15 **A:** To my knowledge. But, you know, folk can do
16 what folk want to do. But to my knowledge ---

17 **Q:** I understand. And it's not a test. I
18 appreciate your time. One other follow-up.
19 Are you suggesting with this testimony about
20 your computer there was some plot to take
21 documents off your computer?

22 **A:** I'm gonna rephrase that. Because as I told
23 her -- told Ms. ---

24 **HEARING OFFICER:** Pike.

25 **A:** Ms. Pike. They came and took my computer, but



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1 they did bring me another computer.

2 Q: Right.

3 A: Which was a different one, which, you know.
4 But my documents that were on there on my other
5 computer, they were gone.

6 Q: Okay.

7 A: Because I, you know -- I had not backed them up
8 or anything. So and I never did get those
9 back.

10 Q: Okay.

11 **HEARING OFFICER:** Can I see that letter again?
12 Maybe you can get it faster than I can.

13 **MS. McCONNELL - EXAMINATION BY THE HEARING OFFICER:**

14 **HEARING OFFICER:** Can you tell me who would have
15 used that letterhead?

16 A: I don't know. But I'll tell you, when I do
17 stuff, I don't call people doctor. I would
18 have said Vernon -- well, I would have said V.
19 Callicutt -- V. Kenneth Callicutt. Then I
20 would have put a comma Ph.D. or E.D. And
21 that's the way -- and then I would have put,
22 like, if he were interim, I would have put
23 interim under the bottom. So I don't know.
24 And as -- there again as I said, I know
25 where -- who this -- did this. I don't know.



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1 And I don't use this kind of font. I use
2 arial. I always use arial. So but I don't
3 know.

4 **HEARING OFFICER:** Okay.

5 A: And I wish I could but ...

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

7 I don't -- did either of you have any follow-up
8 on what I just asked.

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

10 **HEARING OFFICER:** Okay. All right. Thank you,
11 Ms. McConnell.

12 -----(Witness excused.)-----

13 (Off the record.)

14 ~~ANGELA H. BAIN, Ph.D., SPHR, having been duly sworn,~~
15 testifies as follows:

16 **DR. BAIN - DIRECT EXAMINATION BY MS. POLVI:**

17 Q: So I'll start with some kind of background
18 questions before we get into some follow-up.
19 But in terms of background, let's start with
20 what is your current position?

21 A: I'm the superintendent in Chester County School
22 District in Chester, South Carolina.

23 Q: How long have you been in that role?

24 A: Let's see, since February 1st, 2016. So that
25 would be almost, what, two and a half years.



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1 Well, two years and eight months.

2 Q: And tell us about how you first heard about the
3 position.

4 A: Let's see. I was retired from the Department
5 of Education and doing some consulting work on
6 my own and received a call and asked if I would
7 be interested in speaking with the board about
8 the interim position for Chester.

9 Q: And what is your background in the educational
10 career field?

11 A: Whoo, okay. Well, I have -- this is my 39th
12 year, I think, 38th or 39th year in education.
13 I have a degree in psychology. My B.A. is in
14 psychology. I have a masters in education. An
15 MBA and a Ph.D. in education leadership and
16 policy, as far as my formal training is
17 concerned. I've been a teacher, assistant
18 principal, principal, assistant superintendent,
19 chief HR officer, human resources officer, and
20 college professor in education, and education
21 administration. So I think I've run the -- and
22 now superintendent.

23 Q: And how long were you employed at the
24 Department of Education?

25 A: The first time, about three years. And the



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1 second time, I came with Molly as one of her
2 deputies in January '15. And I retired in
3 September '15.

4 Q: So with regard to the first meeting that you
5 had with Chester County School Board where you,
6 you know, spoke to the board, did they relay
7 any information to you about the type of job
8 that you would be filling, like kind of the --
9 I guess, kind of where things were leaving off
10 with the interim superintendent and where thing
11 were gonna be going?

12 A: Well, I probably asked a lot of the questions
13 at that point. Because when they called just
14 to ask me to come talk with them, I said, well,
15 I'll come talk to them, because I've been
16 reading about Chester County in the eClippings.
17 And so I came to talk to them, and I've had --
18 read -- before I got there, I read two years'
19 worth of board meeting agendas and minutes, and
20 I read two years' worth of articles in both the
21 Rock Hill Herald and the local paper, which is
22 the Chester News and Reporter. So I kind of
23 had a feel for what was going on.

24 Q: And when you transitioned to the interim
25 superintendent role first before you became the



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1 full-time superintendent ---

2 A: Uh-huh.

3 Q: --- did you have any kind of exchange with
4 Dr. Callicutt from him serving as the interim
5 superintendent to you serving as the interim
6 superintendent?

7 A: No, I really didn't. I think -- he was
8 leaving. Let me just think about this time
9 line a minute. He was leaving the end of
10 January. And he told them at the beginning of
11 January that he was gonna be gone at the end of
12 January. And so they were pretty anxious to
13 get someone on board.

14 So when I came to talk to them, I really think
15 it was like January 26th or 27th. And at that
16 point, the only -- I didn't sit down and talk
17 with him once they called me and offered me
18 that position as interim. I was anxious to
19 talk to him, but we did speak on the phone one
20 time before I took over in February.

21 Q: And describe for us what you and Dr. Callicutt
22 discussed at that time during your phone
23 conversation.

24 A: Excuse me. What was that?

25 Q: With Dr. Callicutt, you know, with your, I



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1 guess, kind of one transition phone call, what
2 was the kind of communication that y'all
3 discussed?

4 A: Just where the district was and then he offered
5 his help, anything that I needed. It really
6 wasn't that long of a conversation.

7 Q: Okay. And when you came the superintendent of
8 Chester County School District, who was on your
9 senior cabinet?

10 A: Let's see, Charles King was the -- I think they
11 called them associate superintendents. Jeff
12 ~~Gardner was another associate superintendent.~~
13 Charles was the instructional person, and Jeff
14 ~~was operations.~~ And Anna Stroud was the
15 executive director for finance. Shawn Williams
16 was the human resources executive director.
17 And I left one out. Oh, Brooke Clinton, she
18 was the public information officer.

19 Q: So with regard to ---

20 **MS. POLVI:** I'm just gonna borrow Exhibit 8, I
21 believe it is. Thank you.

22 Q: So this Exhibit 8 is the grievance that was
23 filed with regard to Dr. Slayman, and it's
24 dated September 8th, 2015. And it's signed by
25 five individuals. Were those the five



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1 individuals that you just listed that were
2 still in those roles?

3 A: Yes.

4 Q: So let's kind of go one by one, talking about
5 them. So let's start with Charles King. And
6 I think you described as him being kind of a
7 supervisor over instruction; would that be
8 accurate?

9 A: Right.

10 Q: How would you describe his performance?

11 A: I would like to have had someone who was a
12 little more on the ball.

13 Q: And did Dr. King ever tell you about his
14 aspirations to become a superintendent?

15 A: He did.

16 Q: What did he tell you?

17 A: That that was his goal and that he had applied
18 for several superintendent positions and that
19 he had aspirations to be a superintendent.

20 Q: With regard to Jeff Gardner, what were -- what
21 was his performance like when you were his
22 supervisor?

23 A: Again, I really wanted more -- more timely
24 followthrough with Jeff on some -- on his
25 tasks.



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1 Q: And with Anna Stroud, how would you describe
2 her performance?

3 A: Again, Anna was out a lot. And the same thing
4 with followthrough and timeliness on getting
5 her work done.

6 Q: And how would you describe Shawn Williams'
7 performance in her role?

8 A: She was chief -- I think her title was
9 executive director for HR. And when I first
10 got there, one of the things that I did and
11 I -- this is some background information -- is
12 ~~I met with every principal at their school and~~
13 ask how there were things -- some things that
14 ~~I could do to help them and what they felt~~
15 needed. And the majority of principals had
16 complaints about Shawn and about Anna Stroud
17 specifically, those two. That they didn't
18 follow through, that they were -- I think one
19 description of Shawn was that she did not have
20 a good, quote, bedside manner and so ---

21 MR. WINBURN: Hearsay.

22 THE WITNESS: A person told me that.

23 MR. WINBURN: Yeah. That would be hearsay.

24 HEARING OFFICER: Okay. Rephrase your question.

25 Q: Let's just -- with regard to exclusion of what



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1 people told you specifically about them ---

2 A: Uh-huh.

3 Q: Still you can tell us about what you concluded
4 from those follow-ups.

5 A: I had teachers who called and complained about
6 her and how she treated them.

7 Q: And how would you describe Brooke Clinton's
8 performance?

9 A: Brooke wanted to sensationalize. As PIO, she
10 wanted to sensationalize a lot of things and
11 wanted to overexpose it, I guess. And I was
12 trying to coach her on how to be better at
13 that. And she was part time as well, so there
14 were some followthrough issues there.

15 Q: Accurate to say that of those five individuals,
16 only Jeff Gardner is currently an employee of
17 the district?

18 A: He currently an employee; yes.

19 Q: So with regard to Dr. King, when did his
20 employment end with the district?

21 A: I think effective July, end of July 2016.

22 Q: So you would have been his supervisor for
23 essentially the second half of the school year?

24 A: Well, he actually left his position in April,
25 but he was paid through July 2016.



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1 Q: What prompted his departure in April?

2 A: Well, I guess everybody in this room is privy
3 to that. It's on the website so -- there was
4 an issue with him and a district office person.
5 He was her clinical -- I guess, clinical
6 supervisor is what you would call it or
7 supporting supervisor through Western
8 Governor's University while she was working on
9 her administrative certification. And it came
10 to my attention that he had allowed her access
11 to his files where he had to document her and
12 observe her. And he gave her access, and
13 she -- where she actually did the work or the
14 reports that he was supposed to be doing.

15 So ---

16 Q: And what was that individuals name?

17 A: Her name -- oh, I forgot. Kelly
18 Lunsford-Thomas.

19 Q: And what kind type of feedback did you provide
20 to Dr. King about your concerns?

21 A: Well, I met with him. Actually, I met with
22 Kelly and he in the same room the first time,
23 and he denied giving her access. And then we
24 had an e-mail that shows that he did. So at
25 that point, I became very concerned about



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1 whether he was being truthful with me or not.

2 Q: And what happened next after that, meeting
3 with -- between the three of you?

4 A: Well, I put Kelly on administrative leave with
5 pay until we can investigate. And I did some
6 investigation through Western Governor. They
7 provided me with documents. And, of course, I
8 had to report that to them. And then I
9 reported this to the Department of Education.
10 And, gosh, there's a lot to this, but that's
11 basically how it ended up that we reported her
12 to the Department of Education and then also
13 Dr. King.

14 Q: With regard to Dr. King, did he relay anything
15 to you with regard to any concerns he may or
16 may not have had about Dr. Slayman?

17 A: When I met with him during this time? During
18 this ---

19 Q: Or at any time.

20 A: I don't -- I think they tried to be very -- I
21 don't think that they really wanted to talk
22 about that with me. And when they started it
23 down that road, I just said we -- that this is
24 we're not gonna go -- we're not going there.

25 Q: Did you try to give each of the grievants a



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1 clean slate?

2 A: Sure, of course. I mean, that's -- I was new.
3 I just -- I wanted to see for myself.

4 Q: And what did you -- in terms of we kind of went
5 one by one, but what did you determine from
6 having worked then with these five grievants,
7 what did you see?

8 A: Well, I have very high expectations, and I felt
9 like they could do more, all of them. That's
10 my assessment of all of them.

11 Q: With regard to Jeff Gardner, when did his
12 ~~tenure as a associate superintendent of sorts,~~
13 when did that end?

14 ~~A: This past June, the 30th, 2018.~~

15 Q: And did that coenlist with the end of his TERI?

16 A: Yes, it did.

17 Q: So was his change from his current role
18 voluntary?

19 A: Yes.

20 Q: And then with regard to Anna Stroud, when did
21 she cease working for the district?

22 A: May 31st, 2017.

23 Q: And did that coincide with the end of her TERI?

24 A: It did.

25 Q: Did she leave voluntarily?



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1 A: We eliminated the position.

2 Q: And what was the reasoning behind that?

3 A: When I got there in February 2016, the board
4 directed me to hire a CFO. She was not a CFO,
5 and I don't see any -- I didn't see any
6 documentation where she had any college at all.
7 And so I had a concern as well, but the board
8 said that they have been working with her for
9 years. In fact, there was a letter in her file
10 about that they required her to get a degree.
11 This was written back in 2006 by another
12 superintendent, and he directed her to do that,
13 and she didn't do it. So I met with her in
14 March and told her that the board had given me
15 the directive to get a CFO and that I would be
16 bringing in a CFO.

17 Q: And was the superintendent who was the signator
18 on the 2006 letter, would that be Mr. Campbell?

19 A: It was.

20 Q: With regard to Shawn Williams, when did her
21 employment with the district cease?

22 A: I think it was June 2016 at the end of her --
23 that year.

24 Q: Was that a voluntary transition for her to seek
25 a comparable position at another school



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1 district?

2 A: She did. She went to -- I believe it was
3 Orangeburg Five.

4 Q: And with regard to Brooke Clinton, when did her
5 employment with the district cease?

6 A: April 2016.

7 Q: What were the circumstances resolving around
8 the end of her employment?

9 A: Brooke apparently had an opportunity for
10 another job at the Chamber. She was not happy
11 with some decisions that I made, and she made
12 ~~that very clear to me that she wasn't.~~ So
13 she -- I think at that point after we had that
14 ~~conversation at least back in February '16,~~ I
15 think that's when she began to look for another
16 job. And she was forthright with me she was
17 looking for another job.

18 Q: When Brooke Clinton left to seek other
19 employment, and she -- you testified that she
20 had some disagreement with some of your
21 decisions, describe for us kind of how your
22 perception is of -- let me -- good Lord.
23 Restart that garbled question. Is -- let me
24 simplify it as well.

25 With regard to Brooke Clinton, I think you



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1 testified that she had -- it's kind of
2 sensationalized some things?

3 A: Uh-huh.

4 Q: What did you observe her sensationalizing?

5 A: One example is -- and we had a discussion about
6 it and I was trying to coach her about how to
7 kind of pull back on some of that. We had a
8 handicapped student in a wheelchair who had a
9 toy gun in his wheelchair. I think he was
10 sitting on it or had it in the back of him.
11 And she came to me with that information and,
12 you know, let me know that it was a toy, which
13 was great. But she wanted to notify all
14 parents of the -- this particular cluster of
15 schools. We had three areas in this one area.
16 She wanted to notify all parents. And I said,
17 no, we will only notify the parents of the
18 students who are on that bus, who are on the
19 special needs bus. That was one. I said
20 that's overdone.

21 A second example that I can give you is there
22 was a private Facebook page, and I don't really
23 know how it came to her, but she came to show
24 me this Facebook page. And a parent who had a
25 child's lunch tray, and it has certain items on



1 it and the, you know, the whole -- there was a
2 comment list, as you know, on Facebook. And
3 the comment list said -- it's just terrible.
4 She said, well, I think we need to respond to
5 this. And I said, now tell me this is a
6 Facebook page that's private, or are they
7 responding on our page, on the district's page?
8 And she said it's a private page. So I said,
9 well, if it comes to us on our page because
10 we -- if we are in the business of responding
11 to private Facebook pages, then we're gon' be
12 really busy. -- So in my opinion -- and this is
13 what I'd like for you to do -- just wait and
14 see if anybody pops it on our page. And if
15 they do then, I have three answers for them.
16 Number one, we follow USDA guidelines; number
17 two, we follow the State student nutrition
18 guidelines; and number 3, these middle school
19 students get to choose their food. So this kid
20 chose his food. I said so I'm not worried
21 about it. So those were two examples that I
22 can think of right now that I think she didn't
23 like it that I told her no.
24 And then the third -- I guess there was a third
25 time where we were in budget meetings, and she

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1 kind of was rolling her eyes at the principals.
2 And just -- and after the second one, I just
3 said, Brooke, you might not -- you know, you
4 might have some other things that you may want
5 to do besides sit in budget meetings with
6 principals. And she slammed her -- so if you
7 don't want me to stay. She slammed her tablet
8 and her notebook closed and just walked out.
9 And then she sent me an e-mail while we were in
10 the next budget meetings, I'd like to see you.
11 So that's -- that was in February.
12 And so to me, that was kind of the beginning of
13 the end of her not wanting to work in the
14 district. Because I was giving her some
15 direction, and she really didn't need to be in
16 those budget meetings. And I'd never had -- in
17 my experience working budget meetings, I never
18 had a PIO in budget meetings. So she didn't
19 like it that I told her that she could leave.
20 So she was not happy with me.

21 Q: And that type of behavior, is that different
22 than what you would expect of someone in a
23 senior cabinet?

24 A: Oh, certainly.

25 Q: Did the board members ever express any concern



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1 to you about any of these senior cabinet
2 members, the five that we're discussing?

3 A: Yes.

4 Q: And what were that -- what were those concerns?

5 A: With Anna, I've already kind of told you a
6 little bit about that. They were concerned
7 that she did not follow through in what she was
8 told to do in 2006.

9 **MR. WINBURN:** Hearsay.

10 **HEARING OFFICER:** Rephrase.

11 Q: Are any concerns that you relayed to the board
12 that were substantiated?

13 A: Yes.

14 Q: And what were they?

15 A: Anna Stroud did not have the degree that she
16 was supposed to have and she was directed in
17 the letter from Barry Campbell in 2006.

18 And then Shawn Williams, they had had
19 complaints and so had I from teachers about how
20 she treated them. She was not very
21 professional with them. I think that's it
22 right now.

23 Q: I want to ask you some questions about time
24 frame that you served as the deputy state
25 superintendent of education. What departments



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1 were you supervising?

2 A: Teacher certification, teacher evaluation --
3 teacher and principal certification and
4 evaluation, human resources, family and
5 community engagement office -- gosh, I've got
6 to think of what I did. I can't even remember.
7 There have been so many.

8 Q: Several under your umbrella?

9 A: Several.

10 Q: And was the -- related to teacher licensure,
11 educational licensure, were you familiar with
12 that processes?

13 A: Yes.

14 Q: And describe the process that normally is used
15 to handle related -- issues related to an
16 educator's certificate?

17 A: Issues with like revocation or ---

18 Q: Any type of disciplinary action.

19 A: Disciplinary action. Okay. Well, I mean, if
20 a district were to report it, then this would
21 go into office of general counsel, and then the
22 office of certification would then be involved.
23 And there's usually an officer who kind of
24 reviews it and then gets it to perhaps the
25 State board of education for action. And



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1 there's -- there are varying levels of what can
2 happen to an educator's certificate at that
3 point.

4 Q: And is there a timing best practice on when an
5 individual is supposed to be notified if
6 there's been a complaint against their
7 certificate?

8 A: Well, I think it depends on, you know, the
9 workload, number one. But generally, you would
10 want to do -- push these through as soon as
11 possible so that you can at least give the
12 educator the decision in a timely manner.

13 Q: For an individual to be notified about two and
14 a half years after a complaint, is that normal
15 or outside the norm?

16 MR. WINBURN: Objection. She's not an expert.

17 MS. POLVI: This is basic factual -- I mean, this is
18 her position and -- that he previously held,
19 and it's relevant knowledge. Part of the
20 claims in this case relate ---

21 MR. WINBURN: Did she serve in general counsel's
22 office?

23 MS. POLVI: This is clearly factual information upon
24 which she, without having an expert witness
25 designation, can testify to.



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1 MR. WINBURN: Have you alleged prejudice?

2 HEARING OFFICER: Wait a minute.

3 MS. POLVI: There are due process claims involved in
4 this case.

5 HEARING OFFICER: I think you need to lay some
6 foundation that this is part of what she had
7 knowledge of here at the Department.

8 MS. POLVI: Before you answer that last question, if
9 we can backtrack a little bit ---

10 A: Uh-huh.

11 Q: --- can you lay some more foundation to that
12 effect?

13 A: Well, in 1998 -- it was a long time ago -- I
14 was also working at the Department of
15 Education. And I worked -- the office was over
16 on Pickens Street under the office of teacher
17 certification, I think it was called back then.
18 But I was the director for ADEPT, which is the
19 teacher evaluation system. And it was brand
20 new then. And as part of that office,
21 sometimes teachers would be evaluated and they
22 wouldn't pass their evaluation.

23 And so part of my job as the director of ADEPT
24 was to sit in -- we called it the TRTC
25 committee at that time, Teacher Recruitment



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1 and -- oh, I don't remember what TRTC stands
2 for back then. But I worked there in that
3 office for three years. And so, yes, I'm
4 familiar with that process and the timeliness
5 time lines.

6 **MS. POLVI:** Is that sufficient, or do we need to go
7 further?

8 **HEARING OFFICER:** That's different than disciplinary.

9 A: Well, we did have to do disciplinary hearings,
10 and I had to be in on it as the director. And
11 so when we had a report from anyone -- because
12 ~~I had to monitor the evaluations. -- If someone~~
13 were being nonrenewed because they weren't --
14 ~~they didn't pass their evaluation, then it had~~
15 to go through those committees. And so each
16 year that we would send those lists through.
17 And so that's -- I'm familiar with that time
18 line.

19 **MR. WINBURN:** Apples and oranges.

20 **MS. POLVI:** As a deputy state superintendent of
21 education, she would have knowledge about
22 licensure matters for educators. And as a
23 superintendent -- both. But I mean it's ---

24 **HEARING OFFICER:** I think you need to ask her about
25 the process for disciplinary procedures.



1 Q: What is the process for disciplinary
2 procedures?

3 A: Well, it goes to general counsel. And then
4 they involve the office of certification. And
5 then if there was a representative that sits in
6 on some of those hearings, then that
7 representative would sit in on the -- in the
8 hearings.

9 Q: When you have been in a role at the Department
10 of Education and with ADEPT, when a issue is
11 brought to a teacher or a educator's attention
12 or some complaint has been made, what is the
13 time line that you were privy to, the up and
14 notice time frame?

15 A: Well, usually it was within a couple of months
16 when it would come before the TRTC.

17 Q: And this complaint, with regard to
18 Dr. Callicutt filing it in October 2015,
19 preceded your time as superintendent at the
20 Chester County School District, but were you
21 made aware of the complaint being filed once
22 you became superintendent?

23 A: Once I became superintendent?

24 Q: Yes.

25 A: Not until I received, I think, a letter in



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1 January from office of general counsel that
2 this was coming back up -- January 2018 that
3 this was coming back up. And then I was -- I
4 didn't realize that that had been reported to
5 the Department.

6 Q: Did the board, at any time when you were being
7 hired as superintendent or any time thereafter,
8 ever discuss with you that they had any
9 knowledge of the complaint being filed?

10 A: No. We didn't discuss that.

11 Q: Are there any grievance, senior cabinet
12 employees' statements on file at Chester County
13 School District related to Dr. Slayman?

14 A: Ask that again?

15 Q: Are there any type of like, grievance or like
16 senior cabinet statements that are on file with
17 the district?

18 A: Not that I don't know of. The first time I saw
19 senior cabinet statements was in the packet
20 that the Department of Education sent to me
21 back in September, I think, of this year.

22 Q: Is there a copy of the complaint? Like once
23 you became aware of it, did you see any copy of
24 the complaint filed by Dr. Callicutt to the
25 Department of Education about Dr. Slayman on



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1 file with the district?

2 A: The only time I saw that, again, was in the
3 packet that I received from the Department of
4 Education about in September of 2018.

5 Q: And we have a copy of the letter. So assuming
6 that, you know, it was sent on the date it was
7 sent, would a superintendent need to keep a
8 record of that somewhere on file of a complaint
9 being sent?

10 A: I would think so, yes. But if you're not aware
11 of it, if you don't know about it, you can't
12 track it.

13 Q: Okay.

14 A: And I became aware of this September and
15 that -- but then in -- well see, January '18,
16 I think there were something, that this hearing
17 was coming about. And so I want to make sure
18 that I'm clear on that. I've never seen the
19 letter, which was in October, until this packet
20 came to me. But I saw a letter from office of
21 general counsel. Might have been Mr. Winburn
22 that wrote the letter stating that this was
23 coming -- this case was coming forward.

24 Q: And to -- just so it can be clear on the
25 record, so Dr. Callicutt did not leave a record



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1 of this complaint ever being filed with the
2 district as far as you know?

3 A: I don't know if he left it with the district.
4 He did not leave it with me. And neither did
5 he make me aware of that in our first -- our
6 first and probably last conversation over the
7 phone before I took over.

8 Q: So fair to say the first time that you heard
9 about it as the acting and present
10 superintendent was January 2018?

11 A: Yes.

12 Q: Was Dr. Hughes serving as a board member with
13 the school district during your tenure as
14 superintendent?

15 A: Yes. He was actually on the interview group,
16 I guess you could call it, that interview when
17 I came to talk to them initially. And he
18 didn't attend any other board members -- board
19 meetings after that. He apparently, right
20 after that, resigned from the school board.

21 Q: Were you aware of Dr. King serving as the
22 acting superintendent for about three weeks
23 before Dr. Callicutt became the interim?

24 A: No.

25 Q: And did Dr. King discuss that with you at all?



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1 A: No.

2 Q: And were you aware of Denise Lawson supporting
3 those -- the efforts of Dr. King becoming
4 superintendent?

5 A: I heard it, yes.

6 Q: And how did you come to have that
7 understanding?

8 A: Let me think. It was probably from
9 Ms. Stroman, one of the school board members.

10 Q: Do you believe that Dr. King was promised the
11 superintendent's role by either/and Denise
12 Lawson and Dr. Hughes?

13 A: Do I believe that?

14 Q: Yes.

15 A: I don't know. I don't know. I don't think so.
16 I mean, I don't have any knowledge of it. Did
17 I hear that? Yes. But I didn't have any
18 personal knowledge.

19 Q: When you first became superintendent and you
20 were named interim, how would you describe your
21 first interactions with Dr. King?

22 A: They were very positive.

23 Q: Did at any time that that type of interaction
24 change?

25 A: Somewhat, yes, later on. And that was



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1 generally when I confronted him with the
2 information about Kelly Lunsford-Thomas that I
3 previously mentioned.

4 Q: And how would you describe your initial
5 conversations with Jeff Gardner when you became
6 superintendent?

7 A: He was guarded, but he was pleasant.

8 Q: And did that change at any time?

9 A: With Jeff, he was always guarded. But he was
10 always friendly.

11 Q: Has the Chester County School District received
12 any bills for legal services related to
13 Dr. Slayman and the State Department of
14 Education exclusive of potentially White &
15 Story's representation?

16 A: Yes.

17 Q: Which firm are those bills from or firms?

18 A: One firm, Duffie & Charles.

19 MR. WINBURN: That's the relevance for all this?
20 What's that got to do with the price of tea in
21 China?

22 MS. POLVI: I think that's relevant in terms of just
23 at least having it on the record. I'm moving
24 on to my question something ---

25 MR. WINBURN: I'd like to strike it. I don't



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1 understand what legal bills have to do with
2 anything?

3 A: Is that in regard to Dr. Slayman and the State
4 Department of Education is that the attorneys
5 who have been hired by the district are White
6 & Story, so if any other bills have come in, I
7 think it's relevant for it to be on the record
8 as to some other interference in the process.
9 This is solely about Dr. Slayman's complaint
10 with the Department of Education that's pending
11 in this disciplinary ---

12 MR. WINBURN: Are you saying that there are legal
13 bills related to our pursuit of this case?

14 MS. POLVI: The -- I mean, the question spoke for
15 itself. The answer spoke for itself. I don't
16 think we need to spend more time on it.

17 HEARING OFFICER: I have to question the relevance
18 of that one too, because, I mean, we're here
19 about conduct relating to a hostile
20 environment. I don't know that we're here
21 about legal bills. I'm gonna strike that. Go
22 ahead.

23 MR. WINBURN: If Dr. Bain wants to testify to it,
24 I'd love to hear it. But I don't know. I
25 just -- I don't -- don't know. You want to



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1 strike it or not.

2 **HEARING OFFICER:** Listen, if y'all want it in the
3 record, the two of you agree, I -- that's fine.
4 If you want to maintain your objection ---

5 **MR. WINBURN:** I'll maintain my objection. I -- just
6 we've been here 33 minutes, and so we'll keep
7 going. I'll maintain my objection. I don't
8 know -- I don't understand why it's relevant.

9 **HEARING OFFICER:** All right. I'll strike it.

10 **MR. WINBURN:** What's the relevance.

11 **HEARING OFFICER:** Let's go.

12 ~~Q: With regard to each of the individuals, I'd~~
13 like to go one by one with regard to the
14 grievants. Is -- Charles King, if he applied
15 to work for you again, would you hire him?

16 A: Ask me that again?

17 Q: If Charles King applied to work for you again,
18 would you hire him?

19 A: No.

20 Q: And if Shawn Williams applied to work for you
21 again, would you hire her?

22 A: No.

23 Q: And if Jeff Gardner applied for a promotion,
24 would you promote him?

25 A: No.



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1 Q: And if Brooke Clinton applied to be rehired,
2 would you rehire her?

3 A: No.

4 Q: And are those for the reasons that you've
5 already testified to?

6 A: That's correct.

7 Q: During the time frame that these five grievants
8 were supervised by you, did you ever feel that
9 they took out of context of misrepresented
10 anything that you've said?

11 A: A couple of times.

12 Q: Tell us about those circumstances.

13 A: Well, I've already told you about Brooke. And
14 there were a couple of times where I had to
15 answer questions from the news media that I'm
16 not sure how they got ahold of it. And with
17 regard to Charles King in the investigation
18 with the Kelly Lunsford-Thomas situation, there
19 was an e-mail that showed that he had copied
20 everybody or sent an e-mail to all the
21 principals and copied some of the instructional
22 staff but left me off and then used my name in
23 it that was a little bit -- to me, it looked
24 like he was being undermining because he said
25 this was my idea and not hers.



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1 Q: Any other examples like that come to mind?

2 A: I'm just trying to think. With Anna, she -- I
3 think she withheld information from me a couple
4 of times. And then there was another time
5 where I had called her in in March of '16 and
6 told her about the CFO, that the board had
7 directed me to hire a CFO and that we would be
8 doing that and that she would finish -- be able
9 to finish out her TERI. And then we would
10 eliminate that position. And in December when
11 I called her back in with the HR person to say
12 ~~in May that was to be her last year we're gonna~~
13 eliminate the position, she acted like she
14 never even heard that. And so she didn't --
15 she said she didn't know about that. And I
16 said we talked about this in March. So we
17 ended up having to put it in writing to her
18 just to be sure that it was on the record.

19 Q: And following up on that last testimony with
20 regard to Anna Stroud, were there any other
21 times that you think there could have been some
22 selective memory involved from your senior
23 cabinet?

24 A: I think so. I think there were some things
25 that were withheld because there was an issue



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1 with the -- let's -- for example, active
2 shooter drills versus active shooter training,
3 and Jeff did not tell me about the difference
4 between the two. And it just came to light
5 after he left.

6 Q: Was there any disclosure from any of the five
7 grievants that you see listed in the senior
8 cabinet that you had through the beginning
9 parts of your time as superintendent, was there
10 any health concerns brought to your attention
11 from any of those five individuals?

12 A: Yes.

13 Q: And what were they?

14 **THE WITNESS:** Can I say that without HIPPA or --
15 yes, there were health issues.

16 **HEARING OFFICER:** I'll let you ...

17 **MR. SHERARD:** Yeah, I mean, you can answer.

18 **THE WITNESS:** Okay.

19 A: With Anna Stroud, she said that she had several
20 medical conditions. And I can't name the exact
21 ones, but they -- apparently she had -- she
22 couldn't get up and get going in the mornings
23 and that she was frequently late. And she
24 would wait 'til the last minute or not let me
25 know at all. And I had to find her.



1 And then with Jeff, he had frequent medical
2 issues and was out. And really those are the
3 only two -- Shawn was out some but not quite as
4 much as Anna and Jeff.

5 Q: And with Anna Stroud, was it fair so to say
6 that she was not restricted from her medical
7 needs but that it's an adequate expectation
8 that she needs to notify her supervisor?

9 A: Certainly. We had a discussion about that.

10 Q: And with regard to Anna Stroud's personnel
11 file, were there any reprimands from
12 ~~Dr. Slayman to Anna Stroud for any type of~~
13 attendance-employment-related reprimands?

14 A: I'm not aware, but I do know that Ms. Callie is
15 the one who told me that Anna was out a lot,
16 even before I got there. So and apparently
17 there was -- Anna told me herself that there
18 was -- she had some kind of intermittent FMLA
19 paperwork on file, but I never saw it.

20 Q: With Jeff Gardner being out for medical-related
21 reasons, did he ever indicate to you that those
22 were attributable to Dr. Slayman?

23 A: No.

24 Q: How would you describe the relationship between
25 the Chester County School District and the



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1 sheriff's office at the time you took on the
2 role of superintendent?

3 A: It was pretty contentious.

4 Q: And it's been pretty extensively discussed from
5 lots of different perspectives through the
6 witnesses in the case, but yours is relevant
7 from the kind of back end of Dr. Slayman's
8 grievance time frame is kind of how would you
9 describe the contentiousness? Kind of give us
10 some details.

11 A: I got the impression that the sheriff's office
12 didn't trust us in the district, the school
13 board, the administration. And so they -- and,
14 of course, I had also read the articles in the
15 newspaper. So that's how it was at first.

16 Q: Is information that you've discussed during
17 executive session ever been leaked to the
18 public during your time as superintendent?

19 A: It has.

20 Q: Has that been to the detriment of the district?

21 A: Yes, I think so.

22 Q: Did you have any, like, knowledge as to where
23 the leak or leaks sourced from?

24 A: No direct knowledge. I have my suspicions
25 but ...



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1 Q: And who is the only employee of the school
2 board in the district?

3 A: The superintendent.

4 Q: During your time as the superintendent with the
5 school district, how has your evaluation
6 process occurred?

7 A: I've been evaluated one time, and that was
8 December 2017. And it was just a series of
9 questions and then agree or disagree. And each
10 board member had the opportunity to answer
11 that. And then it was compiled by the board
12 chair.

13 Q: And what was evaluation kind of summary that
14 you received?

15 A: It was mostly positive.

16 Q: I don't recall if I've asked you this or not,
17 so I apologize if it is repetitive, but do you
18 have any knowledge of Jeff Gardner's desire to
19 be a superintendent?

20 A: You know, I talked with all of the senior
21 cabinet, and I know Charles mentioned that he
22 had a desire to be a superintendent. And then
23 I talked with Jeff Gardner and Dena Dunlap, who
24 was our -- at the time, she was executive
25 director for instruction. And because part of



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1 my role there was succession planning, and so
2 Jeff did not express a desire to be
3 superintendent. He said, no, he did want to be
4 a superintendent. He didn't have a desire to
5 be a superintendent. Dena did, and so she
6 proceeded to work on her superintendent
7 certification. And at this point, she's almost
8 done. It's taken her a couple of years but, I
9 encouraged both of them, and he said, no, he
10 didn't want to do it.

11 Q: Do you know if that's different from things
12 that he had relayed in the past, if you happen
13 to ---

14 A: I don't know if, but that's what he told me.

15 Q: During your extensive career in the education
16 field, have you ever been aware of any type of
17 grievance like this where a senior cabinet
18 filed a grievance against a superintendent?

19 A: No.

20 Q: And have you ever been aware of any other
21 superintendent being reported to the Department
22 of Education for unsubstantiated accusations?

23 **MR. WINBURN:** Object to the form.

24 **HEARING OFFICER:** Rephrase the question.

25 Q: For accusations that hadn't yet been proven



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1 true or false?

2 A: I'm not aware; no.

3 Q: And part of follow-up I want to ask you about
4 is about if there's any other personal motives
5 that we haven't already talked about that
6 you're aware of with regard to the five
7 grievants as to why they may or may not have
8 been a part of a grievance, if there are any
9 other reasons that you have personal knowledge
10 of?

11 A: It was discussed about that Charles King wanted
12 ~~to be the superintendent. That's all I know.~~

13 Q: And I've asked you some different questions.
14 And you've given me some different answers to
15 the different types of questions I've given,
16 but I want to do a kind of summary question if
17 we've -- to kind of make sure I haven't missed
18 any key facts. Is if there's any other times
19 that we haven't already talked about that you
20 felt any of these five grievants had misled you
21 in any kind of way?

22 A: I think Anna did quite a bit. I had to
23 struggle with her about coming in late. And
24 then we would have a, you know, an alarm -- a
25 notice from the alarm company that she had gone



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1 in -- because you could tell who goes in --
2 that she -- she would go in after hours a lot
3 and that she would go in on weekends a lot.
4 And I had conversations with her about that and
5 said if you -- if you're -- if you are not able
6 to get your work done, then I need to look at
7 staffing issues. I need to get you some help
8 if you are that far behind. But we can't have
9 you coming in on a typical manner, which she
10 would do frequently. We can't have you coming
11 in because there could be workers' comp issues;
12 somebody could -- you know, you're here at
13 night by yourself. You know, there's -- there
14 are just so many things that you -- that could
15 happen, and I don't want you doing that. If
16 you're overworked and you can't get your job
17 done, let me know and we can get you some help.
18 And so I said if you have to be -- I set this
19 up. If you have to be here in the building
20 after hours, then you have to get my
21 permission, and you have to tell me why you're
22 gonna be here. And she did it for a while.
23 She continued to do it. And then after a
24 while, she would just keep coming in, and I --
25 whether she knew it or not, I got a report

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1 every week about when she came in or not, when
2 anybody came in.

3 And so I worked with her again. And, again,
4 she continued with that same practice. And I
5 finally just said I'm gonna take your access
6 away. I'm gonna take your alarm code and your
7 key. You cannot do this anymore. In fact, I
8 had a meeting with the entire school district
9 office the first time I addressed it, and then
10 the second time individually with her, and the
11 third time I took her access away.

12 Q: ~~I think I've covered most of my things, but~~
13 I've kind of done the same pattern with each
14 witness. If there's something that you think
15 is important to have on the testimony for
16 Ms. Pike, feel free if I haven't asked you
17 about it.

18 A: Okay.

19 Q: Or if not, I could pass the torch for their
20 follow-up questions.

21 A: No. If they ask questions, I may think of
22 something. So I'll do it that way.

23 Q: Mr. Winburn has the opportunity to ask you
24 questions, and then Ms. Pike. And I may have
25 follow-up.



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1 A: All right.

2 **DR. BAIN - CROSS-EXAMINATION BY MR. WINBURN:**

3 Q: Dr. Bain, my name's Scott Winburn. You and I
4 have met before. I'm a lawyer for the
5 Department. I wanted to tell you that on the
6 prehearing statement I'm just letting you know
7 you're witness listed Number 13, and beside it
8 says current superintendent of Chester County
9 School District fact witness, that the school
10 district has no knowledge of a complaint filed
11 with the State Department of Education and
12 would verify that no documentation of board
13 action took place for this filing. Fact
14 witness. Is it your position that the -- there
15 should have been no report of these allegations
16 to the Department?

17 A: I don't have an opinion about that.

18 Q: Okay. So you -- what's listed as to what you
19 were going to testify about, you're not gon'
20 testify about?

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

22 Q: Are you gonna ---

23 A: I don't understand the question.

24 Q: Are you gonna testify at all about your opinion
25 as to whether the report should have been made



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1 to us about these allegations of unprofessional
2 conduct?

3 A: Are you asking me that question?

4 Q: I am asking you that question.

5 A: Will you ask it that way then?

6 Q: Yeah. I just did. Do you understand it?

7 A: Ask me again.

8 Q: Should Dr. Callicutt have notified the
9 Department of these allegations, yes or no?

10 A: I don't think so.

11 Q: You don't?

12 A: Huh-uh.

13 Q: Okay. Why not?

14 A: Well, because I don't think he had
15 substantiated documents, especially after I
16 looked at the documents.

17 Q: Okay. Well, let me ask you this: Did Dr. Bain
18 resign her position amid allegations ---

19 A: I'm Bain. I'm Bain.

20 Q: I'm sorry. Did Dr. Slayman -- I'm getting
21 y'all confused. You are represented by
22 Ms. Polvi as well, correct?

23 MR. SHERARD: She's represented by me.

24 A: I'm -- he's my ---

25 MS. POLVI: In his capacity, he's respecting ---



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1 Q: But you're also represented by Ms. Polvi in a
2 lawsuit; is that correct?

3 **MR. SHERARD:** Not in her capacity as superintendent.

4 Q: Not in your capacity as superintendent, no. Is
5 that a "yes"?

6 A: What question are you wanting me to answer?
7 Just ask me ---

8 Q: I want to know who all's sitting at this table.
9 You are represented by Ms. Polvi's law firm,
10 correct?

11 A: Personally?

12 Q: Personally.

13 A: Yes, I am.

14 Q: Okay. Now, you just testified that you don't
15 believe Dr. Callicutt should have or had the
16 authority to -- I don't know what your
17 testimony would be -- to report this because
18 the allegations are unsubstantiated. Is that
19 what you testified to?

20 A: Did you -- the question was -- you have kind of
21 a dual question there.

22 Q: Okay.

23 A: You said that did he have the authority to. He
24 did have the authority to.

25 Q: Okay. Good. We're getting somewhere. Now,



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1 you testified for almost half an hour about all
2 the negative things about these five folks that
3 filed the grievance. And I'll go back through
4 that in a minute. And then you were given an
5 opportunity to tell Ms. Pike anything else that
6 you think might help her in her deliberations.
7 You got anything nice to say about these five
8 people?

9 A: Oh, sure.

10 Q: Okay. Well, maybe we can get to that. I did
11 catch one thing, to be fair. Around Minute 33,
12 ~~you said that Jeff Gardner was pleasant and~~
13 friendly; is that correct?

14 A: I did say that.

15 Q: All right. How about Jean Ligon. Do you have
16 negative things to say about her?

17 A: No.

18 Q: All right. Do you think she's a credible
19 person?

20 A: Sure. From what I know of her.

21 Q: All right. Do you think these five individuals
22 are credible people?

23 A: No, I don't.

24 Q: None of them?

25 A: No.



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1 Q: Now, you testified -- I'll just generalize
2 here, if it'll help you. You wished Charles
3 King was more timely and had followthrough.
4 You had followthrough issues with Anna Stroud.
5 You complained about what you heard about Shawn
6 Williams' bedside manner. And you said Brooke
7 sensationalize stuff; is that accurate?

8 A: That's correct.

9 Q: All right. Did you reprimand any of these
10 people for these things that you say that are
11 false?

12 A: Well, I certainly like to coach instead of
13 reprimand.

14 Q: Is that a "no"?

15 A: I didn't reprimand but I coached. And I did
16 reprimand actually Anna, as you probably just
17 heard.

18 Q: Right. And you were asked if anybody misled
19 you, and I think you testified maybe three or
20 four times that you think, you think Anna
21 misled you? You don't know.

22 A: Well, I do know, because I gave you an example
23 just a few minutes ago. She did mislead me.

24 Q: Okay. What did she mislead you about?

25 A: Let's see, what was the example I used about



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1 her health issues. She also misled me about
2 the reasons that she was in the office late.
3 So that's a couple, to be exact.

4 Q: And as I understood your testimony, you -- she
5 was coming in to work off hours?

6 A: She was.

7 Q: And you didn't like that. You to stopped her
8 of that. You changed the policy; is that
9 right?

10 A: I didn't change the policy. It wasn't a
11 policy.

12 Q: All right. Now, how do you know these claims
13 were unsubstantiated?

14 A: Well, they only asked five people, from what I
15 could tell in that report. And so when I think
16 you're doing a thorough investigation, you need
17 to ask other people rather than just five. If
18 it's that bad, I think you need to go through
19 and ask other people like the principals who
20 worked with her -- Dr. Slayman I'm referring
21 to. I think you need to ask the people in the
22 district office.

23 Q: Do you know who gave direction to Betty Bagley
24 on about how she was to submit her report?

25 A: I don't know that. No, I don't.



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1 Q: Do you -- so it your testimony that
2 Dr. Callicutt had the authority to report it
3 but that the claims needed to be substantiated
4 before he reported it?

5 A: Dr. Callicutt is the superintendent. And by
6 law, as you know, has to report anything that
7 he thinks is egregious when someone resigns.
8 I just don't think that there was a lot of
9 evidence from what I read that he asked or
10 that -- excuse me -- Ms. Bagley asked enough
11 people as far as the investigation is
12 concerned. That's my opinion.

13 Q: And when you came on board, you didn't think
14 enough about the allegations to even ask what's
15 the status of the Betty Bagley report; what's
16 the status of the allegations?

17 A: No, I wasn't -- I wouldn't be able to do that.
18 I mean, that's not really any of my business.

19 Q: And you also said that Anna -- I mean, Brooke
20 Clinton would sensationalize. Who is your
21 Brooke Clinton right now?

22 A: We have a person who has a dual role. Her name
23 is Rebecca Crouch.

24 Q: And you think she's doing a better job than
25 Brooke Clinton?



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1 A: I do.

2 Q: Do you think she's keeping stuff out of the
3 limelight, out of the news?

4 A: I think that she is informing me along the way,
5 and I think she's doing what I've asked her to
6 do.

7 Q: Would you agree that information about Chester
8 County School District continues to hit the
9 news?

10 A: Is information about -- can you ask that again?

11 Q: Sure.

12 A: I'm not understanding.

13 Q: Let me ask you this: Has everything quieted
14 down in Chester County as far as the school
15 district goes? Are there no controversies
16 right now?

17 A: Oh, gosh. There's always a controversy in
18 school districts, and Chester's not exempt from
19 that.

20 Q: Is that because your new PR person
21 sensationalizes stuff?

22 A: No.

23 Q: All right. Do you think that what was in the
24 news and those two years of articles that you
25 read before you came on, do you think that was



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1 the fault of Brooke Clinton?

2 A: I didn't say that.

3 Q: I'm asking that.

4 A: No, I don't think it's her fault.

5 Q: Okay. Do you have anything positive to say to
6 Ms. Pike about these individuals who filed the
7 grievance?

8 A: Yes. I said I do.

9 Q: All right. Shoot. What does she need to know?

10 A: Well, let's start with Charles King.

11 **MS. POLVI:** I would object to overbroad cross
12 question. I mean, if you had specific things
13 that -- from my direct examination of her that
14 you want to follow up on. But just to
15 broadly ...

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

17 Q: Well, you said none of them were credible; is
18 that right?

19 A: That's what I said.

20 Q: And Jean Ligon's is credible?

21 A: So far, she has been.

22 Q: Okay.

23 A: She still works for us.

24 Q: So does Charles King -- I mean -- I'm sorry.
25 Jeff Gardner works for you?



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1 A: Uh-huh.

2 Q: I'm sorry. Is that a "yes"?

3 A: It is. It's a "yes." He does work for us.

4 Q: And there are zero reprimands from you in these
5 individuals' personnel file; is that fair to
6 say?

7 A: No, that's not fair to say. There's -- I think
8 we had something -- I think I wrote Anna a
9 letter. And I want to clarify ---

10 Q: Do you not ---

11 A: Let me clarify something real quick. With
12 Charles King, I was there from February '16,
13 and he left employment in April, like mid
14 April. Same thing with Brooke, 2016. Shawn
15 left in June. So, I mean, they were there for
16 just a few months with me. And then Jeff
17 stayed on, and Anna stayed on for another year.
18 So I had limited time with Brooke and Charles
19 and Shawn. But the questions that I was asked
20 were what were the issues. And so ...

21 Q: Right. And I asked you probably a more pointed
22 one: Are they credible? And based on your
23 limited time with those individuals, you're
24 willing to tell the hearing officer that you're
25 not credible?



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- 1 A: Not during the time that I worked with'them.
- 2 Q: All right. But you didn't reprimand them for
- 3 not being -- for being liars, did you?
- 4 A: Let's think about Charles King.
- 5 Q: Okay. Let's talk about Charles King.
- 6 A: Let's go on with him.
- 7 Q: All right.
- 8 A: Because he's not credible because I discovered
- 9 some things, and you were in that hearing ---
- 10 Q: I was.
- 11 A: --- with Kelly Lunsford-Thomas. And you heard
- 12 her tell you that he basically gave her the
- 13 link and said you go do it. I don't have time.
- 14 Q: Right.
- 15 A: So to me, that's something that I feel like
- 16 he's not credible.
- 17 Q: Right.
- 18 A: And then ---
- 19 Q: And in that hearing, did he testify?
- 20 A: He did not. Kelly Lunsford did.
- 21 Q: Right. Did you testify?
- 22 A: At the end.
- 23 Q: Did you and I have a conversation in the
- 24 hallway about that?
- 25 A: We did.



1 Q: Did you ever contact the Department or have
2 anyone contact the Department about Charles
3 King after that point?

4 A: No, I don't think so. They contacted me.

5 Q: Okay. You never had anybody contact the
6 Department or anybody on your behalf contact
7 the Department about Charles King?

8 A: No. Well, I mean, I had to send letters in.
9 Our attorneys sent -- after we discovered that
10 about what he did with Western Governors,
11 that -- so, yes, I did.

12 Q: Okay.

13 A: Is that what you're asking me?

14 Q: I'll just leave -- I'll leave it there.

15 A: Okay. All right. So you're good with that.
16 All right. What was the -- I'm losing track of
17 the line of questioning here.

18 **MS. POLVI:** If you could just hold tight 'til he
19 asks the next one.

20 **THE WITNESS:** Okay.

21 A: Ask the next one.

22 Q: All right. Brooke Clinton, you said she
23 sensationalize. How was she not credible?

24 A: Brooke is very immature. And if she didn't get
25 her way -- just like the example I gave you in



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1 the budget hearing. If she didn't get her way,
2 she would slam things, and she would pout, and
3 she would not speak to you so ---

4 Q: Did you reprimand her for slamming things and
5 pouting?

6 A: Well, we had a conversation about it.

7 Q: That's a "no"?

8 A: It was more of a coaching conversation. That's
9 not a "no." It's what I just said.

10 Q: Yeah.

11 A: So ...

12 Q: Who else? You said -- the jury -- so the
13 jury's out on Jean Ligon. You think so, so
14 far, she's credible. Anything else you want to
15 say about Shawn? Any more disparaging remarks
16 about any of these other witnesses?

17 **MS. POLVI:** Objection. And that needs to be
18 stricken. I mean, she's testifying to the
19 credibility of the witnesses. That is a
20 relevant question for me. She's not
21 disparaging these individuals. She is
22 testifying to factual things. She's given
23 examples for each of her statements.

24 **HEARING OFFICER:** Sustained. Rephrase your question.

25 Q: Any other examples that would aid the hearing



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1 officer in her deliberations about how all five
2 of these people who testified in this case
3 under oath are not credible?

4 A: Well, I thought we were going individually
5 so ---

6 Q: Tell me who else.

7 A: We went with Charles King. I don't have a
8 really good impression of him because of what
9 he did in that hearing -- in that situation --
10 or that case. And then in the e-mail that he
11 sent that was very undermining of me. All

12 right. -- So that's him. -- I've already talked
13 with you about Brooke. With Anna, as I told
14 you, there were some things that she was into
15 where she was insubordinate. And then ---

16 Q: Now she's insubordinate? How was that?

17 A: Well, I told her three times not to do
18 something, and she did it anyway. Remember
19 that line of questioning?

20 Q: I do.

21 A: All right. So that's what I'm getting at.
22 That's insubordinate. I'm her boss. I told
23 her not to do it. She did it.

24 Q: Right.

25 A: Three times. So we're gon' -- so that's



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1 Brooke, Anna, Charles. And then Shawn, Shawn
2 was -- to me, she was very negative to me. She
3 seemed very sharp and snappy with me any time
4 I gave her a directive. And so that's her.
5 The principals came to me and said that she
6 didn't handle a few situations correctly.
7 And then with Jeff, I've later learned with
8 Jeff, he had trouble all along with
9 followthrough and now specifically I've learned
10 that he didn't follow through on some
11 situations with the sheriff's department with
12 active shooter training, not active shooter
13 drills. And so that's -- I think that's all
14 five of them. So there -- that's why I say I
15 don't think that they're credible.

16 Q: And just to be -- well, let's take Jeff
17 Gardner. Your position is that he's not
18 credible because he doesn't have followthrough,
19 right?

20 A: That's part of it; yes.

21 Q: No. That's the only thing you've testified to.
22 You're basing his credibility on his lack of
23 followthrough. I want to be real clear about
24 that. Anything else?

25 A: Well, there were several examples of lack of



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1 followthrough.

2 Q: That relates to credibility how?

3 A: Well, because when you're the boss and you tell
4 somebody to do something and you give them a
5 deadline and they don't meet the deadline and
6 continue to have to tell them over and over
7 again, then that's not credible. I can't trust
8 you.

9 Q: So you're willing to say that they -- these
10 witnesses are lying about the things that
11 Dr. Slayman said?

12 A: No, I'm not.

13 MS. POLVI: Object.

14 MR. SHERARD: I'm gonna object to that too. I
15 mean ---

16 MR. WINBURN: You're not a party to this.

17 HEARING OFFICER: Sustained. Sustained.

18 Q: But you want the hearing officer to believe
19 that these individuals are not credible? Is
20 that what you want to leave with ---

21 A: In my belief that -- the experiences that I've
22 had, they were not credible for me.

23 Q: Okay. Do you go to the breakfast omelet or the
24 Country Omelet for breakfast?

25 A: No. Well, let's see. I do go there sometimes.



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1 Q: How often do you go?

2 A: I went -- I took my senior staff there about
3 three weeks ago, and I treated them to
4 breakfast. And we had our senior staff
5 meeting. And then probably back in the summer
6 I went. Why were you asking that question?

7 Q: You do understand that the Department has a
8 role in investigating claims of unprofessional
9 conduct?

10 A: I do.

11 Q: Whether those claims are unsubstantiated at the
12 time of report or whether they're substantiated
13 at the time of report. Am I right?

14 A: Ask that again?

15 Q: Do the claims have to have been adjudicated by
16 the district first in order for the Department
17 to take up the charge and pursue the case?

18 A: I don't think so.

19 Q: Okay. All right. That's all I have.

20 **HEARING OFFICER:** Do you have some follow-up?

21 **MS. POLVI:** I do. Thank you.

22 **DR. BAIN - REDIRECT EXAMINATION BY MS. POLVI:**

23 Q: I want to ask you about the last line of
24 Mr. Winburn's questioning with regard to taking
25 up the charge is that the statute that's kind



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1 of at issue is reporting when someone resigns
2 under questionable circumstances. Is that a
3 fair summary of the statute?

4 A: Yes, yes.

5 Q: And so if a board has made the determination
6 that they've heard the grievance, they found it
7 moot, should the next superintendent who had no
8 personal knowledge of it whosoever make a
9 complaint about it?

10 MR. WINBURN: Mischaracterizes facts in evidence.

11 MS. POLVI: Dr. Callicutt wasn't even there until
12 after Dr. Slayman left, so it's not a
13 mischaracterization. He would have no
14 knowledge.

15 MS. POLVI: Your call.

16 HEARING OFFICER: Rephrase that question.

17 MS. POLVI: Sure.

18 Q: Is Dr.-- is it your opinion that Dr. Callicutt
19 voluntarily made this report versus something
20 that he had to do?

21 A: I don't know.

22 Q: That's fair. And I wanted to -- Mr. Winburn
23 asked you some follow-up about kind of the
24 Country Omelet, things of that sort. And I
25 want to kind of redirect a similar line of



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1 thought, a little different is that community
2 involvement. Is it normal for a superintendent
3 to be involved in the community in which they
4 are leading the school district?

5 A: Yes, it is.

6 Q: And would you, in your current role, need to be
7 interacting with community leaders such as the
8 city council, the fire department,
9 philanthropies in the community, things of that
10 sort?

11 A: Yes, I do.

12 Q: Would there be anything nefarious with a
13 superintendent having breakfast with community
14 members?

15 A: No. I do that actually when I'm invited. I
16 mean, for lunch and -- we had lunch meetings.
17 We have breakfast meetings. We have Rotary.
18 I'm at Rotary every Tuesday for lunch.

19 Q: Those are all my follow-up. Thank you.

20 **HEARING OFFICER:** Can we take a quick break and then
21 come back? And I do have some questions for
22 you.

23 (A break was taken.)

24 **DR. BAIN - EXAMINATION BY THE HEARING OFFICER:**

25 **HEARING OFFICER:** Okay. Dr. Bain, you have heard



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1 just a little bit -- a tiny little bit about
2 the Country Omelet, AKA the breakfast club.

3 A: Okay.

4 **HEARING OFFICER:** Do you participate in the
5 breakfast club?

6 A: No, I don't. Not the one that you're
7 referencing.

8 **HEARING OFFICER:** Okay.

9 A: I don't have a breakfast club.

10 **HEARING OFFICER:** Okay. So do you -- as part of
11 your community involvement, do you associate
12 with those same people that are in the
13 breakfast club?

14 A: I really only know of two people that are in
15 the breakfast club. And they are -- yes,
16 they're on committees with me.

17 **HEARING OFFICER:** Okay.

18 A: So, yeah, I mean, I associate with them.

19 **HEARING OFFICER:** Do they influence any of your
20 decisions ---

21 A: No.

22 **HEARING OFFICER:** --- with regard to the school
23 district?

24 A: No. I mean, I take what they suggest and mull
25 it over with what other people have said. So,



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1 sure. I mean, you want to get input from
2 everybody.

3 **HEARING OFFICER:** Sure. I really think that's all
4 the questions I have for you. You were really
5 very clear in your answers. I think that's it.

6 A: Okay.

7 **MS. POLVI:** I don't have any follow-up.

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

9 **HEARING OFFICER:** Okay. Thank you, Dr. Bain.

10 (Witness excused.)

11 (There being nothing further, the administrative
12 hearing concluded at 5:24 p.m. and resumed November
13 2, 2018, at 2:13 p.m.)

14 DAY FIVE - FRIDAY, NOVEMBER 2, 2018

15 **HEARING OFFICER:** So we are back on the record with
16 the case of in the matter of Dr. Agnes Slayman,
17 Educator Certificate Number 134958. All right.
18 We just looked through some exhibits and
19 confirmed what was admitted and what was not
20 admitted. And it's my understanding that y'all
21 have some additional documents to at admit into
22 the record.

23 Mr. Winburn, do you want to start with what
24 you ---

25 **MR. WINBURN:** Sure. I'd like to have Petitioner



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1 Exhibit Number 13 admitted with the exception
2 of the final -- the last page of that exhibit.

3 **HEARING OFFICER:** All right. And it's my
4 understanding that we are agreeing that you are
5 going to admit Exhibit Number 22, minus the
6 privileged redactions that we discussed
7 yesterday that were in the record; is that
8 correct, Ms. Polvi?

9 **MS. POLVI:** Correct.

10 **HEARING OFFICER:** Okay. All right. So Petitioner's
11 Exhibit Number 13 and Respondent's Exhibit
12 Number 22. And with respect to the 22, it will
13 be those redactions that are on the record from
14 yesterday.

15 **(Petitioner's Exhibit Number 13 and Respondent's**
16 **Exhibit Number 22 were admitted into evidence.)**

17 **HEARING OFFICER:** Okay. Now, do you have additional
18 ones?

19 **MS. POLVI:** Yes, please.

20 **HEARING OFFICER:** Okay.

21 **MS. POLVI:** I'd also seek to admit Respondent's
22 Exhibit Number 1, which is a two-page document.

23 **HEARING OFFICER:** Okay.

24 **MS. POLVI:** And Respondent's Exhibit 16 ---

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



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1 **MS. POLVI:** --- which was a two-page document, and
2 Respondent's Exhibit 26, which was Ms. Callie
3 McConnell's depiction of the office yesterday.

4 **MR. WINBURN:** Do you mind describing what 16 and
5 Number 1 are again? Okay. Sorry.

6 **MS. POLVI:** 1 is the two-page document from Shawn
7 Williams' testimony, and Number 16 is a
8 two-page document from -- related to a boss'
9 day card.

10 **MR. WINBURN:** Okay. Thank you.

11 **HEARING OFFICER:** Any objections, Mr. Winburn?

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

13 **HEARING OFFICER:** All right. Then Number 16, Number
14 1, and Number 26 for the respondent are now
15 admitted.

16 **(Respondent's Exhibit Numbers 1, 16, and 26 were**
17 **admitted into evidence.)**

18 **HEARING OFFICER:** All right. Ms. Polvi, who will be
19 our first witness today?

20 **MS. POLVI:** Mr. John Stiver wishes to supplement his
21 testimony, so we're gonna call him
22 telephonically.

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

24 **(Off the record.)**

25 **JOHN STIVER,** having been previously duly sworn,



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1 testifies as follows:

2 **HEARING OFFICER:** Mr. Stiver, this is Melane Pike,
3 and I'm the hearing officer. Just please
4 remember that you remain under oath.
5 So please, Ms. Polvi, if you have questions for
6 him, go forward.

7 **MR. STIVER - REDIRECT EXAMINATION BY MS. POLVI:**

8 Q: Can you hear me okay, Mr. Stiver?

9 A: I can.

10 Q: And just reaffirm that you understand you're
11 under oath for the record.

12 A: Yes, ma'am.

13 Q: Thank you. You contacted me saying that you
14 had additional information you wanted to
15 provide to the hearing officer for this
16 hearing, so feel free. Go ahead and state what
17 you needed to state.

18 A: Okay. On October the 8th, I talked to Shannon
19 Polvi about providing clarification concerning
20 days I had worked in the district.

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

22 A: And additional testimony after referring to my
23 notes. And she suggested I provide you this
24 information which I gave to Ms. Pike and
25 Mr. Wilburn [sic].



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1 I was licensed in North Carolina and
2 South Carolina as a teacher, a middle school
3 principal, a high school principal, and a
4 superintendent. My contract for Chester County
5 School District was for 146 days from July 2013
6 to June 2014. After referring to my calender
7 (phone interference) ---

8 (Off the record.)

9 Q: Mr. Stiver, are you still there?

10 A: I'm still here.

11 Q: Thank you. And then just slow down just a
12 teeny bit for our court reporter. But if we
13 can just -- she said the last part she heard
14 was with regard to -- let her -- she's gonna
15 read out the last part and just pick up from
16 there.

17 A: Okay. That would be fine.

18 **COURT REPORTER:** My contract for Chester County
19 School District was for 146 days -- we can go
20 after the date.

21 A: Okay. From July 2013 to June 2014. After
22 referring to my calender of work for the
23 district, I was out of the district office
24 approximately 25 full days for deployment and
25 training. Since the schools are close to



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1 district office, most visits to the schools
2 were two to four hours at a time and back to
3 the office. Of the three days a week that I
4 was there, I met either Dr. King or
5 Mr. Gardener at the start of each work day and
6 ate lunch with Dr. King and Mr. Gardner at
7 least once a week.

8 As testified, the only concern shared with me
9 was the number of times that Dr. Slayman had
10 called them to her office. I'd never heard any
11 comments that related to a hostile work
12 environment from Dr. King, Mr. Gardner, or

13 Mrs. Stroud. I have been an administrator for
14 approximately 30 years and served as a
15 technology consultant for five years. In my
16 roles as technology consultant and
17 administrator, one of my tasks was to evaluate
18 personnel. From my observations, Dr. King,
19 Mr. Gardner, and Mrs. Stroud had difficulty
20 managing their assigned responsibilities. And
21 that was the context of what I had mailed you.

22 Q: Thank you. Is there anything else that you
23 want to add while we're on the record?

24 A: No. I think that's fine.

25 Q: Thank you. I don't have any further follow-up,



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1 but Mr. Winburn or Ms. Pike might.

2 A: Okay.

3 **MR. STIVER - RECROSS-EXAMINATION BY MR. WINBURN:**

4 Q: Mr. Stiver, based on your observations, did any
5 of those individuals have difficulty telling
6 the truth?

7 A: I would have no -- as far as telling the truth
8 in regards to what, anything?

9 Q: Anything. You want to make a comment about
10 their work ethic, but I'd like to know what
11 your thoughts are on whether they have a
12 problem telling the truth.

13 A: I'm not aware of any issues becoming in contact
14 with them or them not telling me the truth.

15 Q: All right. Thank you.

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

17 **HEARING OFFICER:** Mr. Stivers [sic], just so that I
18 understand, this is Melane Pike.

19 A: Yes, ma'am.

20 **HEARING OFFICER:** You said that your calendar
21 reflected that you were in the district office
22 for 25 full days of training. Did I understand
23 that correctly.

24 A: No. I said that I was out of the district
25 office, the schools, for approximately 25 days,



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1 full days where I didn't -- I might have
2 checked in to the district office, and then I
3 went to the school or I went directly to the
4 school and then report to the district office.

5 **HEARING OFFICER:** Okay. So you would have been
6 in -- if I understand what you're saying, you
7 would have been in the district office for at
8 some point during the day for 25 days?

9 A: Yes.

10 **HEARING OFFICER:** Okay. And many of those days you
11 ate lunch with Dr. King and Mr. Gardner?

12 A: At least once a week, I did.

13 **HEARING OFFICER:** Okay.

14 A: I don't have that documented, but that's
15 usually we did eat lunch at least once a week
16 or more depending on how the schedules were.
17 Because there were times that we did things --
18 as far as the technology, all three of us were
19 involved in those items at the same time and at
20 the same location.

21 **HEARING OFFICER:** Okay. So was it always Dr. King
22 and Mr. Gardner together or sometimes one or
23 the other?

24 A: One or the other.

25 **HEARING OFFICER:** But not together?



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1 A: Sometimes it was together, but it just depended
2 on people's work schedules.

3 **HEARING OFFICER:** Okay. All right. I understand.
4 Thank you very much.

5 A: You're welcome.

6 **HEARING OFFICER:** All right. If there's not any
7 further questions, then I think we can dismiss
8 Mr. Stiver.

9 **MS. POLVI:** Yes. Thank you, Mr. Stiver.

10 **HEARING OFFICER:** Thank you for your testimony,
11 Mr. Stiver.

12 (Witness excused.)

13 **MS. POLVI:** Mr. Boyd, unfortunately he was here
14 yesterday, but he's starting a new job this
15 week. So that's part of the concern in terms
16 of scheduling. So I would intend to now call
17 Dr. Slayman.

18 **MR. WINBURN:** Do you intend to call him at a later
19 time?

20 **MS. POLVI:** I'm still hoping that he'll be able to
21 be available today, but we haven't confirmed.
22 He called -- we're playing phone tag also. He
23 called me back at the office when I was over
24 here yesterday so -- to try to coordinate. But
25 unfortunately we just haven't been able to get



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1 ahold of him, and his voice mail box is full.

2 **HEARING OFFICER:** Was he subpoenaed?

3 **MS. POLVI:** No. He's voluntarily appearing. He
4 came yesterday. It's just -- it's -- honestly,
5 it's just logistical difficulties, my
6 understanding, of his new job.

7 **HEARING OFFICER:** If we can do him after 5:00, do
8 you think he could come?

9 **MS. POLVI:** We'll keep trying.

10 **DR. SLAYMAN:** That's what I was doing right now is
11 calling. You know, I think he started that job
12 this week because he's driving from -- I think

13 he's driving from Rock Hill to town.

14 **HEARING OFFICER:** So the job is here in Columbia?

15 **DR. SLAYMAN:** That's why yesterday ---

16 **HEARING OFFICER:** We're off the record for just a
17 minute.

18 **(Off the Record.)**

19 **HEARING OFFICER:** Dr. Slayman, will you please be
20 sworn in by the court reporter?

21 **AGNES M. SLAYMAN, PH.D.,** having been duly sworn,
22 testifies as follows:

23 **HEARING OFFICER:** Ms. Polvi?

24 **DR. SLAYMAN - DIRECT EXAMINATION BY MS. POLVI:**

25 **Q:** We're going to start with the similar pattern



1 as the other witnesses where I'll ask you some
2 background information before we get into the
3 content of why we're here.

4 A: Okay.

5 Q: If you can go ahead and tell us about your
6 background in the educational career field?

7 A: I began in education in 1982 as a classroom
8 teacher, then became a special education
9 teacher.

10 **HEARING OFFICER:** Hold on a second. Just -- do we
11 need to leave a telephone out in the event
12 that ---

13 **(Off the record.)**

14 A: In 1982 I began as a classroom teacher, special
15 education. In 1991 I became a high school
16 assistant principal. In 1997 or '8, somewhere
17 in there -- anyway, I went from an assistant
18 principal in a high school to a high school
19 principal and a middle school principal, was
20 given the option of -- a new school was being
21 built choosing -- and that was at North Central
22 High School. Whether to remain with the high
23 school or go to the middle school, I chose to
24 stay with the high school. From that point in
25 2004, became an assistant superintendent for



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1 curriculum and instruction. And then in
2 January 1, 2012, was named the superintendent
3 in Chester County School District.

4 Q: And ---

5 A: And I'm certified as an elementary, middle, and
6 high school principal and supervisor,
7 superintendent, special education teacher.

8 Q: And I'd like to show before you Respondent's
9 Exhibit 21, which is your CV or resume.

10 **(Respondent's Exhibit Number 21 was marked for**
11 **identification purposes.)**

12 A: Uh-huh.

13 Q: Does this accurately depict your
14 accomplishments and your educational kind of
15 background in the field?

16 A: It does. And there's also another position on
17 there, and that was after I resigned my
18 position as superintendent. Chester County
19 School District kept me on as a liaison to the
20 board, a consultant until June 30th, 2016.

21 Q: And let's talk a little bit more about that.
22 When did your employment end with Chester
23 County School District?

24 A: September. I think it was September 24th or
25 -5th. Somewhere around in there, the end of



1 September 2015.

2 Q: And as part of the contract that was executed
3 with Chester County School District, were you
4 continuing to be a consultant employee until
5 the end of the school year?

6 A: I was.

7 MS. POLVI: I'd like to enter 21 into evidence.

8 MR. WINBURN: No objection.

9 HEARING OFFICER: Okay. So moved.

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

12 Q: Tell us, what was your experience like in the
13 school district prior to Chester and Kershaw?

14 A: I had been in that school district for a little
15 over 20 years, as you heard, as an
16 administrator. Had a great deal of support.
17 As a matter of fact, when the position of
18 assistant superintendent -- well, as an
19 assistant principal at the largest high school
20 in the district, when the principalship came
21 open, I was selected for that and became the
22 first female high school principal in the
23 history of that district and then remained
24 there really as the only high school female for
25 a long time. I don't think there's been



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1 another one since. And my peers sat on an
2 interview team along with district level
3 personnel and community leaders and selected me
4 to fill the role of assistant superintendent
5 for curriculum and instruction. And that was
6 because of the academic gains that the school
7 that -- I went into the most rural school
8 district in the county with the highest poverty
9 and the test scores that were not very good.

10 Q: And during the time frame of 1982 until the
11 grievance of why we're here was filed in 2015,
12 had anyone else ever made a complaint against
13 you, anything close to this type of nature?

14 A: I've never had a complaint made against me
15 since I started with the State government in
16 1977.

17 Q: Prior to the grievance being filed in
18 September 2015, how would you describe your
19 performance as a superintendent with Chester
20 County School District?

21 A: If you will look at the evaluations that I was
22 given by the board of trustees for the time
23 that I was there, they were exemplary. They
24 did not have anything negative to say during
25 that time. And the evaluations were -- that



1 were signed were unanimous.

2 Q: And I won't duplicate the testimony that we've
3 already entered through Ms. James and
4 Ms. Stroman with regard to your
5 accomplishments. Well, there's two we hadn't
6 yet entered. Respondent's Exhibit 5 and
7 Respondent's Exhibit 4. I'm just gonna to pass
8 those over to you. Let's go one by one. Tell
9 us about that first document.

10 **(Respondent's Exhibit Numbers 4 and 5 were introduced**
11 **into the record at this time.)**

12 A: This is the September 2013. It's my evaluation
13 which would have begun January of 2012. It was
14 for the '12-'13 school year, and it was the --
15 this is the public statement that was written
16 to the press about my evaluation.

17 Q: And what was the evaluation that you received?

18 A: Let me -- give me just a second to look. Well,
19 it says that it was unanimous. At this meeting
20 the board publicly expressed its unanimous and
21 strong approval of Dr. Slayman's performance
22 and her commitment to the children of the
23 district as well as to her staff and community
24 at large. The board in particular commends
25 Dr. Slayman for her efforts to ensure not only



1 a balanced budget but to place additional funds
2 in the district fund balance as well as her
3 vision and commitment to all the children to
4 have access to current technology resources
5 that are so necessary. The board is proud to
6 announce that Dr. Slayman received the
7 Superintendent of the Year Award from the
8 South Carolina Career and Technology Educators
9 Association for the 2012-'13 school year, not
10 to mention the numerous awards and accolades
11 our students and staff have received, based on
12 their hard work and dedication to education and
13 learning.

14 And then they amended my contract and gave me
15 a raise, and they extended my contract. And it
16 says the board is thrilled with the leadership
17 that Dr. Slayman continues to provide,
18 commences her for her tireless dedication to
19 our students and community and her vision for
20 the future and looks forward to working with
21 her for many years to come.

22 Q: And which exhibit number was that one?

23 A: Exhibit 5.

24 **MS. POLVI:** I'd like to move that into evidence.

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



1 HEARING OFFICER: Okay. So moved.

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

4 Q: And the next exhibit that you have in hand?

5 A: This is the accomplishments for the '13-'14
6 school year. And what I had to do -- well,
7 what I chose to do was to go by each of the
8 areas that were assigned to me: Board
9 superintendent relations, instruction,
10 facilities, technology, human resources
11 operations, budget, and then recognitions, and
12 community and professional growth, and
13 community connections. And I submitted these
14 to the board of trustees for my evaluation.
15 And, again, my contract was extended, and I
16 received amendments for these things.

17 MS. POLVI: I'd like to move that into evidence.

18 MR. WINBURN: No objection. I think that was
19 already in.

20 MS. POLVI: I think that was a different one.

21 MR. WINBURN: Okay. Yeah.

22 A: That's exhibit 4.

23 MR. WINBURN: Okay.

24 MS. POLVI: Exhibit 4.

25 MR. WINBURN: No objection.



1 HEARING OFFICER: So moved.

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

4 Q: And I'm gonna stay kind of on the thread in
5 terms of this kind of topic of recognitions and
6 things. The next exhibit I wanted to ask you
7 about is Respondent's Exhibit 24, which is a
8 compilation of awards and recognitions that you
9 have received. If you can review through those
10 documents first to confirm that they are awards
11 and recognitions that you've received, then
12 I'll move to enter it and ask you about it.

13 (Respondent's Exhibit Number 24 was introduced into
14 the record at this time.)

15 A: They are.

16 MS. POLVI: I'd like to move to have those entered
17 into evidence.

18 MR. WINBURN: Can I look at them?

19 MS. POLVI: Yes.

20 MR. WINBURN: I think I've got it.

21 MS. POLVI: Any objection?

22 MR. WINBURN: Oh, no objection. I'm sorry.

23 HEARING OFFICER: So moved.

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



1 MS. POLVI: Thank you.

2 Q: So, Ms. Slayman, if you can tell us about the
3 awards and recognitions.

4 A: I'll go, I guess, chronologically. Just for
5 Chester County; is that correct?

6 Q: Yes, please.

7 A: All right. We had one of our schools in 2012,
8 Great Falls Elementary, selected as a
9 Pathfinder School. In 2013, myself and Chester
10 County School District was named a Duke Energy
11 Power Partner. In 2013, our school district --
12 Chester County School District was named a
13 Microsoft Alliance Partnership. There was only
14 one -- it was the only school district in the
15 Southeast and was only one of 12 school
16 districts in the United States to get that
17 recognition. In 2013 I was invited to be a
18 speaker at Microsoft's mobility conference in
19 New York, which was a big deal for the school
20 district because it was with business and
21 educational leaders from across the world that
22 was there.

23 In 2014 I was nominated for South Carolina
24 Superintendent of the Year. In 2014 I was
25 named the educator of the year by the



1 South Carolina Resource Officers Association.
2 In 2014 for the first time two of the high
3 schools in Chester County School District was
4 named Bronze Schools by US News and World
5 Report. In 2014 I was selected to serve on an
6 international panel in Miami, Florida, for
7 Microsoft's global forum. We spoke about the
8 infusion of technology and to education. And
9 I believe I was on there with the United States
10 Department of Education's individual.

11 In 2014 I was one of 120 superintendents from
12 across the nation selected to attend President
13 Obama's White House Connected Superintendent
14 Summit where we talked about advancing
15 education and advancing the students across the
16 United States through academics.

17 In 2015 I was recognized by the Martin Luther
18 King celebration committee and was actually one
19 of their -- I was the grand master of the
20 parade. I was the first superintendent to be
21 given that honor.

22 In 2015 I was nominated by the entire school
23 board, all of the CEOs of the -- from business
24 and industry, the legislative delegation for
25 Chester County, Fairfield County, and Cherokee,



1 I think. And the school -- for the
2 South Carolina School Administrators
3 South Carolina Superintendent of the Year
4 award, that was in April of 2015.

5 In 2015 Chester County School District received
6 the Youth Apprenticeship Program recognized by
7 the United States Department of Labor, and that
8 was because we put in a program where the kids
9 could actually get their certification and walk
10 out by working on the computers inside the
11 school district. They didn't have to go
12 anywhere. We hired them.

13 And in 2015, I was -- in August, I was selected
14 to go be the keynote speaker for the Idaho
15 State Administrators Conference talking about
16 transforming education, and that included
17 administrators from Idaho and I think it was
18 Wyoming. It was another -- there were two
19 states that married together to do that.

20 You want me to talk about these other things
21 that are in here?

22 Q: The ones that relate to Chester. And then the
23 rest, we can ---

24 A: Okay.

25 Q: --- you know, will be in the record.



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1 A: We set up a partnership with GT. I actually
2 sat on the committee with the County Chester
3 Development Association to kind -- to help
4 bring GT into Chester County. That meant a
5 great deal for Chester County because they
6 needed new industry to go in there. It's a
7 high-poverty area, especially the school
8 district. We established a partnership with
9 York Technical College. I had done the same
10 thing in Kershaw where our kids could
11 participate in apprenticeship programs and get
12 certifications. We did some things with

13 Microsoft on that too.

14 I participated in a Supreme Court case which
15 dealt with the funding for Chester County
16 School District students that lived in an area
17 that came into Chester that were technically in
18 another county's school district, and we
19 prevailed. We set up Telemedicine so that our
20 kids didn't have to leave the schools to go do
21 doctors. And our local physician provided
22 medical care for them. We did a -- had in
23 innovative CATCH program there. I had the
24 support of business and industry to put Junior
25 Olympic archery and rocketry, competitive bass



1 fishing, clay shooting, robotics. And some of
2 those things, I think, are still in place.
3 This was a really big deal. We -- the children
4 in that area didn't have access to Wi-Fi. And
5 in order to make the technology successful, we
6 had to provide them with access to that. So
7 the CEO of TruVista, I met with him. And he
8 agreed to let me have free Wi-Fi for our kids
9 and our teachers across the county. And so
10 then what I did is I went to all the separate
11 county areas and met with mayors and fire
12 department chiefs and libraries and wherever I
13 could get somebody that would allow that Wi-Fi
14 hotspot to be put there. And I had support.
15 Everybody joined in. It was a pretty -- first
16 time that anybody had heard of that. That kind
17 of let to me being able to go to Washington to
18 talk.

19 We constructed a new district office at that
20 point. For the first time in the history of
21 that district, there was a partnership between
22 the school district and County government. I
23 worked with the County supervisor and the
24 government leaders and the County counsel to
25 get the school district on the roster to be



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1 considered to have items that we could not
2 afford put into their one-cent sales tax
3 referendum. And they agreed. Had never done
4 that before. And so things that we couldn't
5 afford like playground equipment, new
6 playgrounds and courts and other things got
7 funded. And they're still reaping that funding
8 today. And it's my understanding they they're
9 getting 31 cents on the dollar for that school
10 district and will do that for quite some time.
11 We were a beta site, two beta test products.
12 And my teachers -- well, I was actually
13 offered, because of the partnership with
14 Microsoft, the opportunity to travel
15 internationally. I can't remember where -- I
16 know -- anyway, I was offered the opportunity
17 to travel nationally. South America was one.
18 Over in -- near Russia was another place. And
19 instead of me taking those opportunities, I
20 gave them to teachers because I felt it was
21 better for teachers to go and share best
22 practices to come back and improve the
23 classrooms than for me go get them when I was
24 not directly involved in the students.
25 And then I did some other things and was a



1 national speaker on a lot of other things and
2 wrote some articles and was in some
3 publications.

4 Q: Thank you. And the next one I'm gonna ask you
5 about ---

6 MS. POLVI: We did enter this one, right? Oh, we
7 have not?

8 If -- I'd like to move to enter Respondent's
9 Exhibit 24.

10 MR. WINBURN: No objection.

11 HEARING OFFICER: So moved.

12 (Respondent's Exhibit Number 24 was admitted into
13 evidence.)

14 MS. POLVI: Quick thing off the record.

15 (Off the record.)

16 Q: I'm gonna ask you next about Respondent's
17 Exhibit 17. This is a 2016 application for
18 South Carolina Superintendent of the Year
19 Program. Is this your application?

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

22 A: It is.

23 Q: And does it include the packet that was
24 submitted?

25 A: It does.



1 Q: Before I ask you more about it, I'd like to go
2 ahead and move to have Respondent's Exhibit 17
3 into the record.

4 MR. WINBURN: No objection.

5 HEARING OFFICER: So moved.

6 (Respondent's Exhibit Number 17 was admitted into
7 evidence.)

8 Q: The first couple of pages are your application.
9 First five pages, to be specific. Is that
10 information that you drafted?

11 A: I did. Brooke Clinton actually helped me draft
12 this. We drafted this together. 'Cause
13 normally what I would do is I would write
14 something up, and I always needed somebody to
15 go behind me to read. It's really hard to read
16 your own writing. And so she and I worked on
17 this together. She proofed it for me.

18 Q: And looking at the packet, the actual
19 submission date is not on here, but it does
20 state that it would need to be submitted on or
21 before April 10th, 2015. Be accurate to say
22 that this was being completed probably in the
23 early months of 2015?

24 A: It was. It was done during probably I would
25 say late March, April for submission by the



1 deadline. Yeah.

2 Q: And how would you describe Brooke Clinton's
3 support of you being nominated as a
4 Superintendent of the Year?

5 A: She was great. I could not have completed this
6 by myself. It was a lot to be able to do when
7 you're managing a lot of other things.

8 Q: And did she ever indicate to you that she felt
9 you were anything less than someone who should
10 receive the South Carolina superintendent of
11 the year program for 2016?

12 A: No. As a matter of fact, she was one of the
13 ones that helped me coordinate it. The
14 individuals who gave the letters, I would call
15 them and ask them if they would do it. And she
16 would help to make sure that things were there.
17 And if somebody didn't have something, she
18 would help get that.

19 Q: And looking after your application section,
20 there's a two-page document, a letter dated
21 March 25th, 2015, from the South Carolina House
22 of Representatives Judiciary Committee with the
23 four representatives' signatures. Is this a
24 document that's recommending you to be the
25 Superintendent of the Year?



1 A: It is. It's signed by Representative Delleney;
2 from Chester, Senator Coleman, who was at that
3 time representing Chester; Representative
4 Dennis Moss and Representative MaryGail
5 Douglas.

6 Q: And the next letter after that is a document
7 from Mr. Bundy from the health care -- at
8 Chester Health Care Foundation. Did he support
9 you for the honor of Superintendent of the
10 Year?

11 A: Yes, he did.

12 Q: And the next is Pastor Feaster, the letter
13 dated April 8th, 2015. Did he support you for
14 this nomination?

15 A: Yes, he did.

16 Q: The next is a three-page document from
17 Mr. Michael Fanning, the executive director of
18 Olde English Consortium. Did he support you
19 for this nomination of Superintendent of the
20 Year?

21 A: Yes, he did.

22 Q: And next is a letter from the president and CEO
23 of TruVista, Mr. Singleton. Did he support you
24 for nomination of Superintendent of the year?

25 A: Yes, he did.



1 Q: And the next is a letter from Chairperson
2 Denise Lawson. Did she support you for the
3 nomination of Superintendent of the Year?

4 A: She did. Even though she signed the letter,
5 the letter was supported by the entire board.

6 Q: And is this for the same calender year when
7 this grievance was later filed against you?

8 A: It is three and a half months prior to this
9 taking place.

10 Q: So let's kind of set the scene of 2015. How
11 would you describe the start of the 2015-2016
12 school year?

13 A: I thought it went well. We had a great opening
14 of school. We had a great convocation where
15 everybody came in. It just went well. I mean,
16 I don't remember anything out of the ordinary.

17 Q: And what happened around August 18th, 2015,
18 that would be relevant for Ms. Pike to be aware
19 of.

20 A: Well, I know we were having -- our security
21 team was occurring around that time. It would
22 have been somewhere prior to -- they were
23 coming on board around the first part of
24 somewhere in August because they were being
25 hired during the summer and coming in. I don't



1 know the date that school started, but I
2 know -- you know, we were starting football and
3 everything else during that time.

4 Q: With regard to the grievance, when did you
5 first find out that some kind of grievance was
6 filed?

7 A: Denise Lawson -- I was at a -- I remember this
8 like it was yesterday. I was at a volleyball
9 match at -- because two of our schools were
10 competing against each other and I was getting
11 in my car to go home. And she called me and
12 said that something bad was going on. And I
13 said, what? And she said something bad is
14 happening that's going on. And she said I
15 don't know what it is. I don't know what's
16 going on exactly. I'm trying to find out. And
17 I made the remark back, look, I said.
18 Somebody's saying that I took money? Are they
19 saying that, you know, did something with a
20 kid. I mean, what's going on here? Because I
21 had no -- I just couldn't fathom anything. It
22 was just out of the blue.
23 And she said, look, I just need you to take
24 some vacation. You haven't had any time off
25 anyway, 'cause traditionally I just -- I really



1 didn't take time off. And she said you and Rob
2 just go down to the beach and take a few days.
3 And I'm not gonna kid you. It rattled me
4 pretty bad.

5 Q: And did that call from Ms. Lawson occur on
6 August 25th, 2015? On or around?

7 A: It was in August, and I would say it was end of
8 August. It's -- I'd have to look back at my
9 statement where I put dates together to know
10 that. I know it was late August.

11 Q: When Mrs. Lawson asked to you go on vacation,
12 was it your understanding that that was her
13 instructing you that you had to?

14 A: Yeah, 'cause she said it pretty strongly to
15 take vacation. But she didn't make it seem
16 like anything -- she told me not to worry -- I
17 do remember that -- and told me that she just
18 needed to find out exactly what was going on.
19 She didn't have a clue herself. She didn't
20 know.

21 Q: Did you believe her at that time?

22 A: Yeah. I hadn't -- I didn't have any reason not
23 to. Well, she had just come back two, three
24 weeks earlier with me from a -- the convention
25 where I spoke out of state.



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1 Q: Did you come to an understanding that things
2 were happening later that you weren't aware of
3 at the time?

4 A: Yes, yes.

5 Q: And what was that?

6 A: Later on throughout that and then after I
7 resigned, I found out that I had a board member
8 who was meeting with employees. I didn't know
9 it was the senior staff at the time, because
10 the first inclination that I had that the
11 senior staff had actually filed a grievance
12 or -- and even who really it was, was the night
13 the grievance was heard. When I saw them get
14 up and go to the back to the boardroom, that
15 room where the -- their grievance was heard is
16 when I actually knew everybody that was
17 involved. Until that night, I didn't know. I
18 had suspicions, and Denise and -- Denise Lawson
19 and Sandra Stroman told me, you know, that Anna
20 Stroud, I think they -- she said Anna Stroud
21 was a part of that. And I think she was the
22 one that they first mentioned.

23 Q: And that meeting that you described where the
24 grievants stood up, was that on August 27th,
25 2015, or is that a later one?



1 A: It would be the date that the board heard the
2 grievance, the grievance from the five
3 individuals. And I think that was after -- I
4 want to say that was in September of 2015.

5 Q: So let's talk about Betty Bagley's
6 investigation. When did you first find out
7 that you were gonna be asked to be speaking
8 with Betty Bagley?

9 A: Mrs. Lawson called -- either called me or
10 e-mailed me. I wish I had my time line.
11 Either called me or e-mailed. She might
12 have -- must have called me and told me that
13 there was gonna be a lady -- and I knew that
14 some folks were involved in this. She had
15 mentioned the names of Anna Stroud. Maybe
16 Shawn Williams, I'm not sure. She didn't
17 mention -- I don't -- the others. But she said
18 that she was gonna be investigating -- that
19 they said that I had put them in a hostile work
20 situation and she was gonna be doing an
21 investigation. And she asked me if I would go
22 first part of the September -- it was before
23 Labor Day -- and meet with Mrs. Bagley. And I
24 told her yes. And she said that -- again, she
25 just assured me at that point, she said, look.



1 don't worry about this. We've got to get this
2 looked at and make sure that there's nothing
3 wrong here.

4 Q: And I want to show you Respondent's Exhibit 9.
5 Is this the scheduling of you meeting with
6 Ms. Bagley?

7 **(Respondent's Exhibit Number 9 was introduced into**
8 **the record at this time.)**

9 A: Yes, yes. And the date then had to be moved
10 because there was a conflict with Ms. Bagley's
11 schedule. It was originally September 1st, and
12 then it moved to a different date.

13 Q: Was it postponed to the next day?

14 A: Uh-huh.

15 Q: I'm sorry. For the record?

16 A: Yes, yes.

17 **MS. POLVI:** I'd like to move to have Respondent's
18 Exhibit 9 into evidence?

19 **MR. WINBURN:** May I see it? No objection.

20 **HEARING OFFICER:** So moved.

21 **(Respondent's Exhibit Number 9 was admitted into**
22 **evidence.)**

23 Q: So tell us about the interview that -- or what
24 type of interview did you have with Ms. Bagley?

25 A: I was under the impression that it was for her



1 to ask some questions and about -- and just
2 gather information. And it was not gonna be
3 anything judgmental. But -- and she did. She
4 told me that the senior staff -- it was at that
5 point that I -- she said senior staff. And she
6 said you've got -- your senior staff has said
7 that they have -- there -- they -- I wish I had
8 my notes -- that they don't -- you're putting
9 them -- I don't know if she used the word
10 "hostile work environment." She may have. But
11 she said that they had made the accusations
12 that I later saw in the statements that
13 Mr. Winburn provided to you. I had never seen
14 those statements until this summer to know.
15 And she called out the things that you later
16 saw in the Bagley report and asked me about
17 them.

18 The thing that bothered me most about this was
19 this was supposed to be an investigation. And
20 she asked me during that time would I resign.
21 She asked me two or three times would I just go
22 ahead and resign. And I had told her, no, that
23 I wanted the opportunity to work with my staff
24 and to make things right, that if that is what
25 they were feeling, then I wanted the

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1 opportunity to fix it. And that's exactly what
2 I said. I was looking for my notes.

3 Q: And at this point that time frame of your
4 interview occurred around September 2nd,
5 2015 ---

6 A: Uh-huh.

7 Q: --- nothing has been put in writing to you
8 whatsoever at this time?

9 A: No. I was only asked to take vacation. And I
10 was never put on administrative leave and -- I
11 had my notes too. I found them.

12 And she said that -- I mean, I never was told
13 that the board meetings that were being held --
14 because I think there were some board meetings
15 held during that time -- that they were about
16 me and about my -- really my employment
17 contract.

18 Q: And what concerns, if any, did you have about
19 kind of how these events transpired that you
20 just discussed?

21 A: She -- because Mrs. Lawson and Mrs. Stroman,
22 when they came to my house, they came to my
23 house and assured me that this investigation
24 would clear this stuff up and for me not to
25 worry. And I have my notes here, 'cause I was



1 smart enough to go home and write some things
2 up when I talked to them. And I when she
3 called me on August the 25th, she said
4 something bad was going on. For your
5 protection, I need you to go on leave,
6 vacation, or personal, some kind of leave. You
7 and Rob hadn't had vacation. On August the
8 27th, they had a special-called board meeting.
9 And after the meeting, I was given a call where
10 Ms. Lawson and Ms. Stroman asked to come to my
11 house. And I told them that they could come.
12 And that's when Mrs. Stroman told me not to
13 resign and I didn't have to worry -- 'cause I
14 said, look, what's going on? Are we gonna be
15 fired? Are we gonna be terminated? And she
16 told me I didn't have to worry about
17 termination. And they did tell me that
18 Dr. Hughes received a call from Anna Stroud and
19 that she was thinking about filing a lawsuit.

20 **MR. WINBURN:** Hearsay.

21 **THE WITNESS:** I'm just telling you what the board
22 members said.

23 **MR. WINBURN:** Yeah.

24 **HEARING OFFICER:** What's your position?

25 **MS. POLVI:** Is that with regard to that, I'd say



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1 it's admission of a party opponent in this
2 scenario is that in terms of the -- it's about
3 the grievants, and it's is district that's
4 acknowledging, you know, who's making the
5 accusation or one of them at this point.

6 **MR. WINBURN:** The testimony is that Anna Stroud
7 called Dr. Hughes, and then Anna Stroud's
8 testified Dr. Hughes has been not been called
9 as a witness. It's rank hearsay.

10 **HEARING OFFICER:** It is hearsay. I'll take it out.
11 Keep going.

12 A: I could only tell you that what was directly
13 said to me was that Mrs. Lawson and
14 Mrs. Stroman looked at me at this point and
15 said that they did not know exactly who was
16 involved or what the specific allegations were
17 being raised by the individuals. And that was
18 on the 27th, so that's why that was said.
19 Then that's when Mrs. Lawson said that the
20 board met and wanted to inform me of the
21 process that would be used and that I would be
22 being interviewed by Mrs. Bagley and that
23 Mrs. Bagley would also be interviewing the
24 senior staff since the complaints originated
25 from -- she didn't know two or three people on



1 the senior cabinet. She still had not named
2 them at that point. She told me not to worry.
3 She told me they were gonna keep the issue
4 quiet and try to protect me, that that's why
5 the board didn't come out in open session and
6 vote to pull me on -- put me on administrative
7 leave. And, again, Ms. Stroman told me I
8 didn't have to worry, that I wouldn't be
9 terminated. And Ms. Lawson stated that
10 everyone on the board knew that I made folks
11 mad because I had to discipline them.
12 And, you know, that if anyone chose to go
13 further, then everyone had that option and that
14 I told them that I was worried because while I
15 was out, that what was to prevent these people,
16 whoever how many there were, from getting
17 together to corroborate their stories and get
18 stories straight. And Ms. Lawson then told me
19 I would be on leave Friday the 28th and Monday
20 the 31st -- because that's when Labor Day was
21 coming up -- and then through the 1st and that
22 everybody would be told I would be on vacation.
23 I would then -- I would meet with Mrs. Bagley.
24 And then on the 3rd the board would meet again.
25 And she also said that she was gonna meet with



1 Charles King, the associate superintendent, and
2 tell him that I was out of pocket. And I asked
3 her why. I said why am I having to take off
4 Wednesday, Thursday, and Friday if this
5 investigation isn't gonna be taking place until
6 August the 31st and I wouldn't be interviewed
7 until the 1st. And Mrs. Lawson told me that
8 she wanted to make sure the County council
9 meeting was held before the interviews took
10 place. And she stated that I was on leave so
11 I would not be at work wondering who was making
12 the allegations. And Mrs. Lawson asked me not
13 to contact district employees, and I told her
14 what -- I would not, that I didn't like it
15 because I felt like I was being punished, but
16 I would do as I was asked.
17 She told me not to worry. She told me that Rob
18 and I, you know, go to the beach, again.
19 Mrs. Lawson told me that she wished that I
20 could have heard what the board members were
21 saying that night that they met.

22 **MR. WINBURN:** Hearsay.

23 **THE WITNESS:** This is what Mrs. Lawson is saying.

24 **MR. WINBURN:** I understand.

25 **A:** She indicated that they were supporting me.



1 That's what she said.

2 **MR. WINBURN:** And that's hearsay, what Ms. Lawson
3 said the board said.

4 **HEARING OFFICER:** Testify as what your understanding
5 was.

6 A: My understanding was that the board was
7 supporting me that night that they met.

8 Q: So let's transition. Let's pause there with
9 the time line. And I want to re- kind of
10 orient towards a couple of things that I think
11 it's important for us to focus on is that as of
12 this time, with regards to your time line --
13 and I don't want that to distract you, so go
14 ahead and kind of close that up for the next
15 couple of series of questions.

16 A: Okay.

17 Q: Is that at this time, you know, we're at the
18 end of August 2015, beginning of
19 September 2015. Was there any basis for your
20 senior staff making a complaint about you?

21 A: I didn't -- I was shocked. I mean, I was
22 devastated to even hear that anybody -- I was
23 shocked. I'm okay.

24 Q: So let's go one by one.

25 A: Okay.



1 Q: Let's talk about these grievants.

2 A: Okay.

3 Q: And your working relationship with them.

4 A: Okay.

5 Q: And I'm gonna kind of group it in a kind of
6 couple different ways. Let's go one by one
7 talking about the working relationship before
8 the grievance is filed ---

9 A: Okay.

10 Q: --- because that's all the relevant time
11 period. After that, you know, end of your
12 employment kind of snowballs with that vacation
13 time.

14 A: It does.

15 Q: So let's start with Anna Stroud. What was Anna
16 Stroud's position?

17 A: Anna Stroud was the director of finance.

18 Q: And how long was she in that role when you were
19 her supervisor?

20 A: When -- she was there when I arrived on January
21 of 2012 and was there when I resigned in
22 September of 2015.

23 Q: So describe for us how Anna Stroud was doing in
24 her job.

25 A: Anna had some difficulty. She had inherited



1 that job from a lady with a finance degree who
2 had left. And she told me this. And I -- and
3 it's -- and it was true. She had kind of a
4 template for a budget that was left. And she
5 plugged the numbers in and made the budget
6 work, as long as you were within that template.
7 I was asking to do some things that were
8 different because I was trying to move money
9 around to put in place some innovative
10 programs. And in order to do that, you have
11 to -- you had to look at funding sources and do
12 some things. And I don't think she was
13 comfortable with that, which is why I think she
14 had a little bit of difficulty with doing that.
15 The board was frustrated with her because ---

16 Q: Let me pause you before we transition. When
17 you talk about comfort level, is that related
18 to her skills and abilities of being able to
19 readjust a budget different than how she'd been
20 doing it for the last several years?

21 A: Yes, yes.

22 Q: And what kind of struggles did that involve?
23 Give us some detail.

24 A: Well, you had to be able to really understand
25 some of the items that you -- or the funds that



1 you were gonna be asked to take and move to
2 some other places. And she would tell me, no,
3 that I couldn't do that. And then I would
4 later check either up here with the State
5 Department, or I would check with other
6 superintendents when, in fact, I could move
7 that money in order to afford other things.
8 But -- and don't get me wrong. She was very
9 knowledgeable on what she did within that box
10 that she operated in. But she also, for
11 whatever reason, had difficulty giving you a
12 number.

13 Like, the board really wanted to know what our
14 fund balance would be, and I would want to know
15 where we were at within the month as to how we
16 looked on our fund balance and our expenditures
17 from comparing it to the year prior, year to
18 date, and where we were at this point in time.
19 'Cause I wanted to make sure that we weren't --
20 we were prepared if there were some cuts
21 coming. And she was not able to provide that
22 number. Didn't -- it -- I think she was able
23 to provide it. I don't think she liked having
24 to provide it because it kind of nailed you
25 down as to where the budget really was.



1 Q: And with her performance in finance, let's talk
2 about a couple of the things related to her job
3 specific. When did you become aware of that
4 she'd been instructed by the previous
5 superintendent and the board that she needed to
6 get additional educational requirements for her
7 job?

8 A: I actually hired Dr. Littlefield as a
9 consultant the come in to help me to
10 restructure the financing to afford those
11 programs because Anna was not able to do that
12 at that point. And so as a piece of him coming
13 in and looking at the overall budget is -- and
14 we were presenting some of this to the board
15 throughout this, the board asked to look at
16 salaries for all employees.

17 And when I gave them the salaries, they noticed
18 that Mrs. Stroud's salary was at the same level
19 as Ms. Williams' salary was. And they didn't
20 understand how that happened. Well, I didn't
21 know at that point how that had happened
22 because I had no knowledge that -- we were in
23 the middle of a salary study too with
24 Dr. Littlefield, so they were the ones that
25 informed me that Barry Campbell had frozen her



1 salary, that by their direction because when
2 she was hired she told them that she was
3 getting her degree, finishing her degree like
4 shortly. I mean, it wasn't like two years from
5 now or whatever. I would say within the next
6 few months. And she did not do it. It came to
7 their attention during Barry Campbell's tenure
8 that she ---

9 Q: And you referred to "they" a couple times. Are
10 you referring to the board?

11 A: The board, board members. It would be the
12 people who had been on the board a long time:

13 Denise Lawson, Maggie James, Gene Boyd. The
14 board members who had been there from that
15 tenure, during that time that would have
16 knowledge of that.

17 And so they questioned me about why those
18 salaries, when they got those salaries, looked
19 the way they were. And I went back in, and we
20 were looking. And, you know, I reported to
21 them that I did not know. I mean, I didn't
22 know anything about a freezing of salary. And
23 then I asked Mrs. Stroud about that.

24 Q: How did Mrs. Stroud respond to you questioning
25 that she had gotten raises then the board had



1 already told her explicitly she was not allowed
2 to get raises?

3 **MR. WINBURN:** Objection. Assumes facts not in
4 evidence.

5 **HEARING OFFICER:** Rephrase.

6 **MS. POLVI:** Several witnesses have testified about
7 it.

8 **HEARING OFFICER:** Rephrase your question.

9 Q: How did Ms. Stroud respond to you question --
10 your questions?

11 A: I went to her and told her that the board
12 members had told me that her salary had been
13 frozen by Barry Campbell and was that the
14 truth. And she told me that she couldn't --
15 either she couldn't remember -- either she
16 couldn't remember or, yes, it was. And I said,
17 well, the board members are telling me that
18 your salary was supposed to be frozen. Why is
19 your salary -- why have you been getting a
20 percentage of increases in your salary is where
21 it is from where it was to Barry Campbell. And
22 then there's information in her file that says
23 it from Barry Campbell and -- or was when I was
24 there. And she looked at me and she smiled and
25 she said, well, the board adopted the budget.



1 And I looked at her and I said, Anna, what do
2 you mean the board adopted the budget? Well,
3 the board adopted the budget. And I looked at
4 her and I said, Anna, are you telling me that
5 every time the board adopted the budget and
6 gave employees a raise, that you got the raise?
7 And she just smiled at me and walked out of my
8 office.

9 Q: When did that conversation occur?

10 A: I would say probably '13 -- no.
11 Dr. Littlefield was there in '15. Somewhere
12 '14, '15 because -- or late -- yeah, somewhere
13 in the '14, '15 time frame. Because prior to
14 that, I had already placed Anna on an
15 improvement plan.

16 Q: Tell us about what kind of improvement plan.

17 A: Let me see, and I can tell you exactly what it
18 says. I did her evaluation, because that was
19 one of the things the board was on in July of
20 2013, and gave her some goals, just as I would
21 every person that reported directly to me. I
22 commended her for what she'd done, for her hard
23 work, and told her what a good job she had done
24 with the reserve and being able to meet
25 expenditures and add money to the reserve.



1 Because she really did do a good job with that.
2 But then I told her that I had goals for her.
3 One was based on attendance and punctuality.
4 She had difficulty getting to work on time.
5 Communication: There were complaints coming
6 from the school buildings, and even within the
7 district office from the two associate
8 superintendents, Charles King and Jeff Gardner
9 and even at times Shawn Williams, about not
10 getting information in a timely manner. I had
11 issues getting information in a timely manner.
12 Sometimes I would have vendors call me that had
13 not been responded to or even information that
14 a board meeting, that meets once a month, you
15 normally take a budget update to show everybody
16 where you're at. And I couldn't get that for
17 her to mail out packets. It was very difficult
18 to get that information. Sometimes she would
19 have to bring it in at the board meetings. And
20 I told her you just need to talk with me.
21 Returning telephone calls, responding to
22 e-mails, communication of the financial
23 standing on a monthly basis, to come in and
24 talk with me and give me those updates.
25 And then professional growth: I really wanted



1 her to complete a finance course through the
2 South Carolina Association of School Business
3 Officers. And I even offered for the school
4 district -- we -- the school district paid for
5 her to take that course, because I felt that
6 that would help her. And I just wanted the
7 proof that she completed and passed the course.

8 Q: And how did Anna Stroud -- how did she react to
9 you when you provided that constructive
10 feedback?

11 A: I think that -- I don't know if this was the
12 first time that someone had put anything in
13 writing with her or not. I tried to do this in
14 as sensitive a manner as I could because I did
15 not want it to be, you know, you drop the
16 hammer on somebody. Did not want that. I
17 wanted her to improve. I liked Anna. I really
18 did. And I told her, I said she's bright.
19 She's very conscientious. But I think Anna, at
20 that point, which it wasn't, thought that I was
21 trying to get rid of her at that point. And I
22 was not. I was trying to help her keep her job
23 and do well.

24 Q: And what had you done to -- what did you do
25 with regard to communicating to the board



1 asking to give Anna enough time to make those
2 changes versus terminating her employment?

3 A: Well, it wasn't until 2015 that they found out
4 that she had been given raises, that raises
5 were placed on her and that that's why she was
6 where she was at in her salary. And prior
7 that, they kept wanting me to hire a CFO. And
8 at that point in June of 2015, they wanted me
9 to terminate her. And I did not do it. I
10 wanted Anna to be able to finish her TERI. I
11 wanted to work with her. I tried to do that
12 from this, you know, from this evaluation on.
13 I went to the board for her and for
14 Ms. Williams to ask to give them an increase in
15 their salary. I was not their -- I went
16 against the board. The board will tell you
17 that. Those board members will tell you that.

18 Q: And one of the things that you referenced is
19 about attendance with regard to Ms. Stroud.
20 What type of feedback did you give her about
21 attendance?

22 A: I told her -- and I actually have it in
23 writing -- that she needed to be at work by
24 8:00 a.m. on a regular basis, that that was the
25 same expectation I had for all employees, that



1 we had discussed her tardiness and her
2 absenteeism several times, that if a situation
3 arose that prevented her from coming to work
4 just to call me on my cell or text me or e-mail
5 me. But, you know, communicate with me. And
6 that I did not want her coming to work if she
7 was ill and that when it happened just to call
8 me, and that if I could help her any way with
9 that goal, just ask me. And that, you know, to
10 complete leave sheets for that.

11 And I got -- her staff wouldn't hear from her
12 when she was out, and I would go around to look
13 for her if I had a question and she wouldn't be
14 there. And they'd just say she's not here.
15 And I'd say do you know where she's at. And
16 they would not know. And there was actually a
17 couple of times when I didn't get an answer
18 either at her home or on her phone, and I was
19 worried about her. I got -- I stopped what I
20 was doing and got in my vehicle and headed
21 towards her house to check on her, I mean. And
22 I got her one -- usually right before I got to
23 her house, you know, she'd tell me that she was
24 sick or whatever and that was fine. And, I
25 mean, you know, when somebody's sick, you know



1 they're sick. I don't question whether you're
2 sick or -- if you tell me you're sick, you're
3 sick. If you tell me you need to be late,
4 you're late, you know.

5 Q: And when you followed up with Ms. Stroud about
6 her attendance, based on that testimony, is it
7 accurate to say that you were following up
8 largely because she wasn't contacting you, a
9 no-call/no-show ---

10 A: Correct.

11 Q: --- versus a please tell me when you're gonna
12 be out?

13 A: Right. And she got better. After that last
14 time that I went, was physically on the way to
15 her house and called and was -- and left a
16 message and said, look, I'm on my way to -- I
17 even called her husband. Because I said, Do
18 you know where Anna's at? I said I'm kind of
19 worried about her. And he said, well, no.
20 She's not there? And I said, no. Well, I'm
21 going over there. And I headed over there and
22 then she called me.

23 Q: And when you said you were headed over there,
24 is that out of ---

25 A: Headed to her house.



1 Q: --- concern or were you going to write her up?

2 A: Oh, yeah. No. I was worried about her.

3 Q: There's been some allegations from Ms. Stroud
4 in her written documents and in her testimony
5 about denials of time off related to FMLA. Did
6 you ever deny Anna Stroud any FMLA time off?

7 A: I never denied any employee time off. If you
8 had the time to take, it was yours to take. I
9 have -- I can tell you for example that, you
10 know, she wrote -- and, for example, she wrote
11 me and said that she had to take her -- Max --
12 Maxie, her husband, to the ER and that she
13 won't be in first thing, and I told her thanks
14 for letting me know, that the condition -- I
15 wrote what it was, but I'm not gon' say that
16 'cause of HIPPA here. Is was awful, no
17 worries, take care of Maxie. These are my
18 responses.

19 No, she said something about that she couldn't
20 connect from home. I needed some information
21 and she said do you need it go in their
22 packets, and I said no, just give it to me
23 Monday so I can edit the document like the
24 board and I talked this morning. Hope you feel
25 better. Okay. Hope you feel better. I can --



1 I told her thanks. Told her please see me when
2 you get here. Glad you're feeling better.
3 Told me she had -- even for anything. I mean,
4 it didn't matter.

5 You didn't have to be sick. I just -- you were
6 part of the senior staff. If there was
7 something that came up, you had to have it. I
8 mean, I can tell you that -- let me find it in
9 here. She was out July 29; July 30, 2015;
10 July 2nd. You know, I mean, I never responded
11 in a negative way. And I have that. I have
12 documentation of that.

13 Q: And Mrs. Stroud was allowed to take leave when
14 requested?

15 A: Whenever she needed. She -- you know, she
16 asked me -- if she would ask me for a day and
17 needed to change it like this one that she
18 needed to take one day here and change it for
19 this, I said sounds good. Her son was sick.
20 I'll be there when I can. I said sounds good.
21 There's something going around in the schools
22 that's not good. I hope he feels better.

23 Q: And just for clarity of when you're testifying,
24 just say kind of what she said and then what
25 your response was.



1 A: Okay, okay. She just said ---

2 Q: What was that last one?

3 A: She said I just slipped and fell going to my
4 car. I didn't get hurt but have to change and
5 will be a little late. And these are all 2015.
6 And I said take your time. Make sure you're
7 okay.

8 I'm having slight vertigo this morning. I took
9 some sinus medication. It's getting better but
10 not enough to come in now. I'll try to get
11 there by 9:00. I said thanks. Hope you feel
12 better. Please let me know when you get in.
13 Matt was able to come home, so I won't be in.
14 Call if you need anything. I said enjoy your
15 time off with Matt. Glad he got home.

16 I'm upgrading my Internet at home, and the
17 technician has to come and install the modem.
18 They said I couldn't do it. They'll have --
19 they have a window of 2:00 to 5:00 or -- on 2/5
20 between 9:00 and 1:00, and they will call me
21 and it should only take a few minutes, and I'll
22 try to get there around lunch but wanted to
23 give you a heads up and I -- in case I have to
24 run out for a few minutes. I said no problem.
25 I have a really bad headache this morning and



1 have been having stomach issues since
2 yesterday. Since I have my eye appointment in
3 the afternoon, will it be okay if I take a sick
4 day. And I said sure.

5 Q: So are all those examples of correspondence
6 where, for several reasons, not even just
7 FMLA ---

8 A: Right.

9 Q: --- relayed that Ms. Stroud wanted off and you
10 said yes in every circumstance?

11 A: Absolutely. And even up and through August 16
12 of 2015 when she was telling me that her
13 husband had that medical issue and that she
14 wouldn't be in first thing in the morning and
15 that she'll either come in or let me know if
16 she had to take him to Rock Hill. And I said
17 thanks for letting me know, that these things
18 were awful, and no worries. Take care of
19 Maxie.

20 Q: And what you are your response?

21 A: Uh-huh, that was my response.

22 Q: Okay. With regard to Ms. Stroud's statement,
23 when she filed this grievance against you, she
24 starts it by calling you not a nice person,
25 selfish, vindictive, cruel, a bully. Did she



1 ever communicate like that with you when you
2 interacted?

3 A: Huh-uh. Even at the time right before all this
4 happened, her son that was still in school, in
5 middle school, very artistic just a really
6 gifted child. And she would bring in his
7 artwork, and we would look at that. And she'd
8 bring her son by. And when he got to high
9 school and joined ROTC -- I mean, she was in my
10 office and she'd come in and sit down on the
11 couch and, you know, we'd talk about her family
12 and ---

13 Q: Is that the type of senior staff that would be
14 having a hostile work environment?

15 A: No.

16 Q: Mrs. Stroud made accusations against you, and
17 I quote, as having chosen her membership and
18 her breakfast club with her political advisors
19 over doing what is best for the children of the
20 district. What is your response to that?

21 A: As a -- number one, I don't know why she would
22 have that perception, but you would have to ask
23 her that. And I don't mean this in a bad way.
24 As a superintendent, you have to have antennas
25 out everywhere. You have to listen to



1 community people and parents and students and
2 business people 'cause everybody comes at
3 things -- and staff -- comes at things from
4 their own experiences and perspective. And I
5 would -- did a -- I did a lot of listen, but
6 the decisions that you make as a superintendent
7 rest on your shoulders. So I don't mean it
8 that it didn't matter. Your opinion did
9 matter, but I had the whole picture, not just
10 that laser focus. And I made decisions that I
11 made based on that whole picture. Nobody was
12 gonna influence me to the point that they were
13 directing me in the direction of the district
14 or the decisions, if that makes sense.

15 Q: And on that thread, tell us about what was
16 entailed with the senior cabinet meetings?
17 Like, let me even break it down to more detail.
18 I'm gonna do a couple questions. How
19 frequently did you meet with your senior staff?

20 A: Depending on what was going on, we tried to
21 meet once a week. And we usually tried to meet
22 on a Monday. And we would meet at 9:00 o'clock
23 and everybody would go around the table and
24 tell what was on their plate for that week and
25 what had been going on. And I would -- Mondays



1 were really good times for me because we had
2 board meetings that night. And I usually tried
3 to keep them in the loop on what they should be
4 prepared for, if something was coming up in
5 their area or something unusual would happen.
6 And I have to go back to something, now that
7 I'm talking about this, to your last question
8 about the breakfast club. The breakfast club
9 people were community people that would flow in
10 and out. It wasn't the same stagnant group of
11 individuals. But there were firefighters that
12 attended those meetings, and there was a rub
13 between the fire department and the sheriff's
14 department. So maybe that is an issue. I
15 don't know. That's speculation so ...

16 Q: And so with the senior cabinet meetings
17 occurring, give or take, once a week, describe
18 for us what type of interactions you were
19 having with your senior staff at those types of
20 meetings?

21 A: At my senior cabinet meetings?

22 Q: Right.

23 A: They just went around the table and said what
24 was going on, and we talked about what -- like
25 what I said -- I was -- what I might be needing



1 from them or what they might be needing from me
2 or what items we might be having come up. We
3 planned for like when we were gonna do school
4 visits. If it was the end of the year, we
5 would plan -- 'cause everybody's split up and
6 we hit different schools for awards ceremonies
7 and stuff. It was just general whatever was
8 going on.

9 Q: And was it an interactive, you know, to sound
10 colloquial, a knights at the round table style
11 where every single senior cabinet member was
12 allowed to speak?

13 A: Oh, yeah. Because what we would do -- it's
14 funny. Just like students in a cafeteria have
15 specific seats and they don't move from them,
16 the senior staff each had specific spots. And
17 they came in and sat. And sometimes I would --
18 we would start down at that end, or sometimes
19 we would start -- different people would start,
20 and then it would rotate around with everybody
21 saying what was happening, what was going on.

22 Q: And were you giving your senior staff, up to
23 the time of this grievance, an opportunity to
24 be heard?

25 A: Either they -- my door was open. They had



1 access to me whenever they needed it. They
2 could reach me by phone. They could reach me
3 by text. They could come in my office. I
4 never, unless it was somebody already in there,
5 denied them the opportunity. They were the
6 leadership of the district with me. And
7 towards the end of the month from like April
8 on, it was kind of hard to meet every week
9 because, you know, you're at the end of the
10 school year and everybody wants your attention.

11 Q: And I want to ask you about your knowledge of
12 Ms. Stroud's connection with the sheriff's
13 office. What was that?

14 A: I knew that they had a very close relationship.
15 I cannot remember if it was that they went to
16 school together or -- I don't -- I just know
17 that they knew each other very well. And it
18 was -- I think Ms. Stroud either said this in
19 her testimony or in her statement -- that I
20 knew it well enough that when I went -- I was
21 the only public official other than Mrs. James
22 who went to Sheriff Underwood's swearing in.
23 And I -- it just perplexed me. I mean, I
24 didn't have a history at that point of why.
25 And I went back and I asked her. I mean, I was



1 comfortable enough to ask her about that,
2 about, you know where is everybody else at and
3 why are they not here.

4 And at that point, is when she told me that,
5 you know, they had known each other. And I
6 know that her husband would have known him. I
7 don't know if he worked for him, alongside him,
8 or what. But I knew that they hadn't known
9 each other because he was a deputy. He'd been
10 in law enforcement a long time.

11 Q: During your time as superintendent in the
12 district, was Mr. Stroud, the spouse of Anna
13 Stroud, employed working at schools in the
14 district in terms of an SRO status?

15 A: He did. As a matter of fact, when I first got
16 there, he was the school resource officer for
17 Louisville High School. And I would see him at
18 football games. And, you know, he'd give me a
19 special parking place, save me a parking place
20 to get into the games. 'Cause I tried to hit
21 all the games that were home that -- at that
22 weekend.

23 Q: And did that relationship in terms of the --
24 for example, Mr. Stroud saving you a parking
25 space, did that change when the board decided



1 to change from SROs to the private security?

2 **MR. WINBURN:** Leading.

3 A: I ---

4 **HEARING OFFICER:** Rephrase your question.

5 Q: Was there -- what, if any, change occurred when
6 the SROs were no longer doing the security for
7 the schools?

8 A: What you need to understand is that when that
9 change took place from the SROs to the security
10 team, I was only in the district for maybe one
11 or two games. And at that point, I would say
12 no. Maxie Stroud was just a very nice man.
13 And I would think no. But I don't know that --
14 if he was there or not. I remember I was at a
15 Chester football game. It was the only
16 football game I went to. After that point,
17 everything started happening. And so I really
18 didn't get to see that.

19 Q: And since we're kind of on this topic, go ahead
20 and tell us, what concerns did you personally
21 have as to the SROs in the school district?

22 A: I had had -- I first got concerns brought to me
23 by the principals about SROs. That's normally
24 what would happen 'cause my interactions with
25 the school resource officers would only be when



1 I went in and out of buildings or
2 extracurricular events. But principals, number
3 one, put -- told me that -- complained that
4 school resource officers, if we have an
5 accident or something happening out somewhere,
6 that they would be pulled out of the buildings
7 without their knowledge by their supervisors.
8 And they were not covered.

9 And that was a big issue for principals in
10 general. Every year on their needs list --
11 because before we developed a budget, we got a
12 needs list from the principals of their top
13 items. And security in every school was an
14 item. So that was number one. But sometimes
15 they just weren't there, and they weren't there
16 for days. They had to go to training, and
17 there would not be anybody available to cover
18 it to be in that school, especially if it was
19 a high school. So I know that that was one of
20 the issues that we had.

21 When we started with looking at the security
22 personnel, the deputies wanted to work our
23 athletic events, and I wanted them to work our
24 athletic events. But for whatever reason, they
25 were under the impression that they could not



1 be there. And my -- I had high school -- they
2 had a meeting. And even one of my high school
3 principals told them that I wanted them to be
4 doing our coverage at our events. And it just
5 it just developed into a contentious
6 relationship between the school district and
7 the sheriff's department.

8 Q: And what occurred on -- a week before
9 Mrs. Lawson calls you. She calls you on August
10 25th ---

11 A: Right.

12 Q: --- 2015. What happened on -- what kind of
13 notification did you receive on August 18th,
14 2015?

15 A: Oh, well, I will tell you what I noticed did
16 start happening after the security team was
17 hired. We had some alarm calls go off at our
18 schools in the Louisville area and the Chester
19 area. And the principals informed me that when
20 the alarms would go off, the normal operation
21 was if the alarms go off, then 9-1-1 is
22 notified, and 9-1-1 tells the alarm company
23 that they're sending a deputy. Well, in these
24 instances 9-1-1 told the principals that
25 the ---



1 MR. WINBURN: It's hearsay.

2 THE WITNESS: I have documentation of this.

3 MR. WINBURN: Present it.

4 THE WITNESS: Okay.

5 MR. WINBURN: 9-1-1 tells told the deputies that ...

6 A: 9-1-1's responsibility -- well, no. I can't
7 even say that.

8 Q: Just hold back 'till we -- go ahead and get the
9 document that you're referring to -- or
10 documents.

11 A: Yeah. Let me give you the principal's
12 statement. That way, you know. 'Cause it
13 prompted me to write a response to the sheriff.

14 Q: Just go ahead and the ---

15 A: All right. This is the ---

16 Q: Well, just hold tight. Hold tight. Grab the
17 principal's documents, the 9-1-1 security
18 dispatch folks, and the -- your letter to the
19 sheriff.

20 A: Okay.

21 Q: And his response. Let's just make that an
22 exhibit.

23 A: Okay.

24 Q: So there's ...

25 A: Yep and then let me find my letter. That's it.



1 MS. POLVI: We'll just make a couple copies to ---

2 HEARING OFFICER: Show those to ---

3 MR. WINBURN: That's fine. I really don't want to
4 hold up. I just don't know what all this has
5 to do with anything. We've been here a long,
6 long time. And I ---

7 MS. POLVI: I'm happen to --

8 MR. WINBURN: What's that?

9 MS. POLVI: --- put on the -- to -- it's directly
10 relevant is that a week after that, is when
11 miraculously this grievance all of a sudden
12 comes into existence.

13 MR. WINBURN: Oh, yeah. And this has been presented
14 in your materials, I assume?

15 MS. POLVI: No. That -- she was gonna testify to
16 it, but if it's necessary ---

17 MR. WINBURN: Oh, yeah. We started this a month
18 ago.

19 MS. POLVI: You're objecting to her testifying about
20 it, so we have the records to ---

21 MR. WINBURN: No. I'm objecting -- she's talking
22 about 9-1-1 telling the principals something.

23 HEARING OFFICER: Okay. Hold on a minute. So do
24 you have an objection to this?

25 MR. WINBURN: I don't know. I don't know. I don't



1 know. I'd like for her to testify to it if she
2 wants to. I want to see everything she's got
3 though. I'm gonna ask for that, everything
4 she's looked at.

5 **THE WITNESS:** Some of these are my personal notes.

6 **MR. WINBURN:** That doesn't matter.

7 **MS. POLVI:** You did not send any discovery responses
8 or subpoena for those records.

9 **MR. WINBURN:** She is under oath, and she's referring
10 to her notes, and I'm entitled to those just as
11 if she is being deposed.

12 **HEARING OFFICER:** Well, we'll get there and -- we'll
13 get there on that in just a minute.

14 **MR. WINBURN:** That's fine.

15 **HEARING OFFICER:** So are you ---

16 **MS. POLVI:** No, you're not.

17 **MR. WINBURN:** Okay.

18 **THE WITNESS:** Anyway, what I'm ---

19 **HEARING OFFICER:** So are we admitting this or not?
20 Do you object to that?

21 **MR. WINBURN:** That's fine. She sent a letter to
22 Sheriff Underwood. This purports to be a
23 letter to Sheriff Underwood.

24 **THE WITNESS:** And he responded back that he would
25 respond.



1 MR. WINBURN: Okay. It's fine.

2 HEARING OFFICER: Okay. So let's admit these.
3 Please mark them as separate documents.

4 MS. POLVI: Well, let's -- we'll make copies for
5 everybody so that if ---

6 MS. MOORE: If you'll go ahead and mark them first
7 and ---

8 HEARING OFFICER: Yeah. That way that ...

9 (Off the record.)

10 (Respondent's Exhibit Numbers 27, 28, 29, 30, and 31
11 was marked for identification purposes.)

12 Q: So Dr. Slayman, with regard to August 18th,
13 2015, what occurred?

14 A: I had received two statements -- well, two
15 calls from principals, and I asked them to put
16 it in writing. And they talked about their --
17 the first one is from Chester High School where
18 the gentleman talked about the ---

19 HEARING OFFICER: Can you tell me what -- which ---

20 THE WITNESS: It's the second sheet.

21 HEARING OFFICER: It's the second sheet of which
22 exhibit?

23 THE WITNESS: It has CHS -- Exhibit 27.

24 HEARING OFFICER: Okay. All right.

25 A: And it says on August 18th, I received a call



1 from the alarm company about 2:30 a.m. The
2 alarm company informed me that we had an alarm
3 coming from the kitchen area. They informed me
4 that they had dispatched the police. 30
5 minutes later -- about 30 minutes later, the
6 company called again and said the City of
7 Chester Police would not respond. I informed
8 the company that we were in the county. They
9 said they would make that call. And about 30
10 minutes, the alarm company said the sheriff's
11 office would not respond to take -- let's see.
12 I lost my place -- would not respond to school
13 alarms because the school district had their
14 own security company to take care of those
15 calls. I thanked them for their efforts and
16 hung up. Then the second one is from -- I
17 don't know if you want that one. It's a
18 different day. It's August 17th.

19 **HEARING OFFICER:** Okay.

20 **Q:** And what correspondence did you send to Sheriff
21 Underwood about that circumstance?

22 **A:** I sent him a letter. I tried to call and
23 couldn't get an answer, so I sent a letter that
24 said I -- Dear Sheriff Underwood, as our
25 responding agency (Chester County Sheriff's



1 Office) it is our understanding that sheriff's
2 deputies would be the officers who would be
3 called upon to provide assistance if the need
4 arises, as is the case with security alarms
5 which occur after normal daily operation hours.
6 Recently our security alarm company, Security
7 Central, informed our principals after alarms
8 were triggered that 9-1-1 personnel stated to
9 them that the sheriff's office would no longer
10 respond to alarm calls on any school campuses
11 because the school district was using a
12 security company to provide services. The
13 security company we employ is used mainly
14 during the school day. We are requesting
15 clarification from you regarding the
16 information being given to the alarm company
17 and then our employees. Thank you in advance
18 for your attention to this matter. It is
19 greatly appreciated. Sincerely, Agnes M.
20 Slayman, superintendent.

21 Q: Did you ever receive a response to this
22 correspondence?

23 A: I did. And that response is -- it should have
24 been in here. Let me make sure you -- it's in
25 here. But he e-mailed me back. I thought it



1 was in there.

2 Q: Is it that document that's in the middle of the
3 table?

4 A: Yes, this is it. It's on August the 18th,
5 2015. And it says, Superintendent Slayman ---

6 **THE WITNESS:** Do I need to stop?

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

8 A: Superintendent Slayman, in response to your
9 letter, the Chester County Sheriff's Office
10 will always provide assistance to the Chester
11 county community. The Chester County Sheriff's
12 Office has and will continue to respond to all
13 alarm calls that are received through our 9-1-1
14 dispatch center. To better serve the school
15 district, we ask that a key holder be available
16 to respond as well during and after normal
17 business hours. Thank you, Alex Underwood,
18 Sheriff, Chester County Sheriff's office.

19 **HEARING OFFICER:** Okay. And so we'll want to -- are
20 you going to admit that? Is there a problem?

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

22 (Off the record.)

23 **HEARING OFFICER:** So this one will be Exhibit ...

24 **COURT REPORTER:** 31.

25 **HEARING OFFICER:** 31. All right. Admitted.



1 (Respondent's Exhibit Numbers 32 was marked for
2 identification purposes.)

3 HEARING OFFICER: And that was an e-mail?

4 THE WITNESS: Yes, ma'am.

5 (Off the record.)

6 MS. POLVI: Just to clarify about the move to admit
7 Respondent's 27 through 32?

8 MR. WINBURN: No objection.

9 HEARING OFFICER: So admitted.

10 (Respondent's Exhibit Numbers 27, 28, 29, 30, 31, and
11 32 were admitted into evidence.)

12 Q: With regard to the series of events, as time
13 has passed, did you feel that you bringing up
14 concerns to the sheriff's office was connected
15 to then what happens with the grievance?

16 A: I did. Because I find it coincidental that all
17 of this was occurring at the same time.

18 Q: So let's transition back to Anna Stroud. When
19 Dr. Littlefield was performing financial
20 reviews of the district in 2015, was he largely
21 reviewing work that was done by Ms. Stroud
22 because there -- she's finance director? It's
23 the topics that he was looking at and what her
24 scope of employment was was similar?

25 A: Yes, yes. But he wasn't just doing that. I



1 mean, he was doing a salary study as well.

2 Q: In terms of individuals on your senior cabinet,
3 what, if any, times were you in discussions
4 with your senior cabinet where they proposed
5 changes in the hierarchy, meaning within the
6 senior cabinet, who reported to who?

7 A: That would have happened individually, and
8 there would have been times -- especially with
9 Dr. King. He came to me and proposed that
10 we -- that he and Jeff split the district.
11 They had some responsibilities, but they did
12 not have the branches of human resources and
13 finance. And so they proposed to me that
14 instead of having a senior cabinet that had
15 five members on it, that the senior cabinet
16 could be consolidated and have Mr. Gardner,
17 Dr. King, and myself be the senior cabinet and
18 public information and putting those branches
19 and various scenarios. At times, Dr. King
20 would propose to have -- and they do have this
21 in some districts -- to be like the second in
22 command with everybody else under that one
23 individual. Everybody wanted to be in charge
24 of somebody.

25 Q: With regard to Ms. Stroud, one of the topics



1 that she allèges relates to her alleging sexual
2 harassment. What do you know about that?

3 A: I know a great deal about it. I had had an
4 issue in ---

5 **THE WITNESS:** Can I look at my notes?

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

7 A: I had had -- there was an issue that developed
8 that really wasn't even related to this. I had
9 had a vendor actually call me, and it was our
10 auditor. And I was on the road somewhere, and
11 the vendor said that he had been contacted by
12 Mrs. Stroud and was I breaking the district's
13 contract with the vendor. And I told him
14 absolutely not. 'Cause number one, I don't
15 have -- the superintendent doesn't have to
16 authority to solely enter into or break
17 contracts. So this occurred on November the
18 26th and, you know, when I got back to the
19 district office, you know, I told Anna. I
20 said ---

21 **HEARING OFFICER:** Excuse me. What year?

22 **THE WITNESS:** Oh, 2013.

23 **HEARING OFFICER:** Okay. Go ahead, please.

24 A: And I said, Anna, do you why I want to talk?
25 Do you know why you're here? And Anna Stroud



1 responded, yes, ma'am. And that I told Anna,
2 I said, you know, you usurped the board's
3 authority when you contacted a vendor and asked
4 them -- talked to them about either breaking
5 the -- maybe breaking the contract or sending
6 in a different auditor to the district. And I
7 said, Anna, did this happen? And she shook her
8 head and said that yes, that it did and that
9 she had talked to the individual who was the
10 CEO or president of the company, Larry Finney,
11 and that -- and I told her. I said, well, the
12 way I know about this is Mr. Finney called me
13 on his way back -- on my way back from
14 Chesterfield. And I told her. I said, You
15 don't have permission for me or the board to
16 make that kind of call. And I told her that
17 that was really did show a lack of judgement on
18 her part.

19 And also we had had a meeting with the auditor
20 a few days before or within the last couple of
21 weeks, and it had gotten pretty heated with the
22 auditor who was there and with Mrs. James and
23 myself. The heated part was between the
24 auditor and Mrs. Stroud to the point that I --
25 we heard the end of the audit, and I ended the



1 meeting. It was that heated. And apparently
2 after they left my office, they went back to
3 Mrs. Stroud's office and had words again.
4 Because I could hear those words when I went
5 down the hall towards the office.

6 And then Anna -- that is when Anna made the
7 complaint about Mr. Madden, who was the
8 auditor. And my antennas immediately went up.
9 She told me that he made her -- she stated
10 that -- let me see here. And there were two
11 auditors in that heated -- that audit. And
12 Anna stated that she did not see how a young,
13 attractive man like this auditor would be
14 attracted to an older woman. She told me that
15 it would not be a problem. It would be doable.
16 And I'm just listening. She stated that the
17 other auditor stated to her that he could tell
18 Anna and Dr. Slayman were as close as they were
19 not a year ago and that Mrs. James was
20 initially mad but that after the hearing about
21 the charter school, he felt it brought Anna and
22 Mrs. James back together.

23 I asked Anna why she didn't tell me about being
24 made to be felt -- to feel uncomfortable before
25 the meeting today. And she told me she didn't



1 want to get anybody into trouble. And Anna
2 said that she did not like feeling vulnerable
3 to men. And I asked Anna if she felt like she
4 was being harassed, and she said yes. And that
5 she felt if this gentleman was harassing her,
6 but it was happening in front of other people.
7 And I immediately started to investigate this.

8 Q: So what steps did you take the investigate
9 Ms. Stroud's complaint?

10 A: I talked to Anna about it. I told her I would
11 not tolerate any kind of harassment. I asked
12 her to give me a statement about what was going
13 on. I immediately notified our attorneys, and
14 then I operated under attorney's advice from
15 that to the point that I then got in touch with
16 that gentleman who owned that company, that
17 president of that company. And I brought him
18 down and the individual that Anna was being
19 uncomfortable with down. And I don't remember
20 if the attorney was there or not. I want to --
21 I think they may have been, but I don't know
22 that for sure. But I was there. And we put
23 this gentleman under the microscope for this.

24 MR. WINBURN: Ms. Pike, I just want to state for the
25 record. I don't mind hearing about all this,



1 but this is a trial within a trial within a
2 trial. And I just would request respectfully
3 that we just keep it moving forward.

4 **MS. POLVI:** We've hit a lot of topics. This is ---

5 **MR. WINBURN:** I agree.

6 **HEARING OFFICER:** Well, my problem is that we
7 allowed Ms. Stroud to testify about this
8 specifically. So I think we need to allow
9 Dr. Slayman to, likewise, testify about it
10 because her story is different than
11 Ms. Stroud's testimony about it.

12 **MR. WINBURN:** Okay.

13 A: I believe that for part of this, maybe the
14 section where we talked to Mr. Finney, the
15 owner of the company -- that Shawn Williams may
16 have also been in there. And I really do
17 believe that I -- that a representative from
18 Childs & Halligan was in there. And anyway --
19 yep, 'cause it says Mrs. Clinkscales and I
20 spoke with you about this matter. You said you
21 felt uncomfortable and harassed, and then we
22 talked about this. We talked about what she
23 had said and that I said she indicated that he
24 had made a statement to her in the conference,
25 meaning that we had where Mrs. James was at



1 during that audit about, see, I told you you
2 should have gone to lunch with me and that you
3 took it to mean that if you had gone the lunch
4 with me. And that you took it to mean that if
5 you had gone to lunch with him, he would not
6 have noted any concerns. And that's why they
7 had the heated discussion, because there were
8 some concerns noted in the audit.

9 You also stated he asked to take you to dinner
10 anyway. We talked about that, and I said, you
11 know, I couldn't confirm whether the statement
12 was made because I didn't hear the comment.
13 And there was simply no way that we could have
14 heard it where their positions were in that
15 setting, where we were all sitting. But the
16 bottom line to all of this for Mr. Winburn is
17 I told her in closing, I expect you to report
18 immediately -- to me immediately, should you
19 believe any comments or conduct occurs in the
20 future that constitutes sexual harassment or
21 really harassment of any kind and that as a
22 school system that we can't address problems
23 that we don't know about and for her to let me
24 know if she had any other concerns and that if
25 I could assist her in any way professionally or



1 personally.

2 Q: So based on your follow-up in investigating
3 Ms. Stroud's complaint, what was your
4 conclusion?

5 A: I don't know. I really -- Ms. Stroud felt that
6 something was there, and I took it serious.
7 And I wanted to her know that I was not gonna
8 let that happen. But are you asking me if I
9 thought it happened or not? I mean, clarify
10 for me what you're asking me.

11 Q: Well, did Ms. Stroud have an opportunity to be
12 heard?

13 A: Oh, absolutely. I wanted to know everything
14 that she had to say, everything.

15 Q: And did she ever report -- this occurred, it
16 appears to be, 2013. Did she ever report any
17 other concerns until later she files a
18 grievance against you?

19 A: No, no. Because I really assured her and
20 kind -- and -- 'cause that's a very serious
21 thing. If that's going on, it's got -- I
22 needed to take care of it. And that's what I
23 wanted her to know. I would not let her be
24 subject to that. I misunderstood what you were
25 asking me.



1 Q: With regard to Ms. Stroud before I move on to
2 the next grievant, is there anything else that
3 you think is important to put on the record in
4 rebuttal to what Ms. Stroud testified to?

5 A: Ms. Stroud, if I recall correctly, had a lot of
6 stuff in her written and verbal testimony. And
7 there are -- there were things in there such
8 as -- there was something written in there
9 about a video that we had done. I guess what
10 I need folks to know is there is a lot of
11 communication with the superintendent and a
12 board that takes place in an executive session
13 where other members of that senior cabinet
14 would not have been present and would not have
15 heard that discussion. So some of the things
16 that they were having perceptions about was
17 not -- they didn't have the whole picture of
18 what the discussion was because they weren't
19 there to hear it.

20 You know, I liked Anna. I defended Anna. I
21 was told in June -- point blank in June of 2015
22 to terminate her and -- when it was found that
23 her salary was raised. You know, and the one
24 that -- I was one of the ones that passed two
25 budgets to -- that got raised. And Dr. Hughes



1 asked me not to do that. And I really didn't
2 want to do that, which is why I didn't. I
3 wanted ---

4 Q: What is the "that" that you're referring to?

5 A: I did not want to terminate Anna. And I went
6 against the board. And I told the board that
7 in July because they kept asking me when I was
8 gonna do it. And I said I want to give her
9 another chance. And some of them were not
10 happy with that. And I wanted her to at least
11 make it to where she finished her TERI out. I
12 felt like we owed that to her.
13 And they wanted me to hire a CFO. And I told
14 the board -- I told Anna that. I had -- I was
15 up front with her and told her that the board
16 wanted that to happen. She was not happy with
17 that at all and felt like she should have been
18 named the CFO.

19 Q: And as you've seen, Anna Stroud is one of the
20 signators on Petitioner's Exhibit 8 that is the
21 September 8th, 2015, grievance filed. And it
22 states, due to a hostile work environment,
23 implications of ethical violations and racial
24 and threatening remarks. Did Anna Stroud,
25 based on your opinion and perception and



1 experience being her supervisor, have a basis
2 to file this grievance against you?

3 A: No, she did not.

4 Q: And having heard her testimony earlier in this
5 hearing and having read her statement that she
6 submitted, how do you respond to it?

7 A: That statement is her view and her perception.
8 I do not agree with the contents of what is in
9 there. Take a look at that statement. You
10 will see repetitions of that, almost verbatim
11 some of those things, from one individual to
12 another that is on there. There are things in
13 there that she would -- that she has written as
14 a firsthand witness to that she wouldn't have
15 even had knowledge of because she wasn't
16 present.

17 Q: And how -- when we look at the written
18 statement that Ms. Stroud wrote, which is kind
19 of a laundry-list thing of everything she can
20 think of negative to say about you. What, if
21 any, of these did she ever discuss with you
22 prior to putting it in writing and submitting
23 it?

24 A: She never discussed anything with me other than
25 that harassment complaint that we just talked



1 about.

2 Q: Now, let's move on to Brooke Clinton. What was
3 Brooke Clinton's role?

4 A: Brooke Clinton was the public information
5 officer.

6 Q: How long did you supervise her?

7 A: From her date of hire, which I think was maybe
8 sometime in '13 or -- 2013 or 2014.

9 Q: And how would you describe your working
10 relationship with Brooke Clinton?

11 A: I had a great -- I thought I had a great
12 working relationship with her. She was a good
13 writer. She helped me to put the district in
14 a positive light. She had some issues, but
15 overall, I enjoyed being around Brooke.

16 Q: And you heard the same testimony I did earlier
17 in the trial when Brooke Clinton stated that
18 she was not part of this grievance until other
19 people approached her and I think in that
20 quote, she learned the -- well, let me
21 paraphrase 'cause I don't have the quote in
22 front of me. But she said the -- she was not
23 a part of this grievance until other people
24 told her that you were some way lying and
25 manipulating her; is that at all accurate?



1 A: No. Well, I heard -- she made that statement.

2 Q: How would you respond to that statement?

3 A: I would say absolutely not. I did not -- I was
4 very genuine with Brooke. I knew her family.
5 I -- my husband and I did funny things for
6 their kids. She sent me pictures of her
7 family, and we talked about her family. She
8 was another one who would come in and sit in my
9 office and sit on the couch or sit in my chair.
10 I thought we worked very well together.

11 Q: And before this grievance was filed, did you
12 have any knowledge that other members of the
13 senior staff were trying to convince Brooke
14 Clinton that somehow you were taking some kind
15 of action that she should be concerned with?

16 A: No. And I would have never thought that Brooke
17 would have taken part in this.

18 Q: And let's talk about the time frame that
19 precedes immediately precedes this grievance.
20 How close in time to Brooke Clinton filing this
21 grievance had you and your husband made
22 Halloween costumes or costumes of a sort for
23 her children?

24 A: Oh, my Lord. We did that -- it wasn't for
25 Halloween. It was -- we were having -- our



1 opening of school, was gonna be like a super
2 hero theme thing. And so I don't know how we
3 got on the subject, but we were talking about
4 it one day, and I told her that I would make
5 her -- one of her sons like Flash, and the
6 other one liked something else and that we
7 would make masks for her. And we did.

8 But we exchanged e-mails all the time. I have
9 a birthday the end of July. She wished me a
10 happy birthday, sent me an e-mail to that
11 effect. You know, we talked about their
12 rabbits. I mean, it was just -- I probably was
13 too close to Brooke. But we were very
14 familiar. She was very familiar with Rob. Her
15 kids called him Mr. Rob. She called him
16 Mr. Rob -- and that's Rob Slayman, my husband.
17 And like I said, I knew her mom and her dad.
18 You know, I'd been up to their farm and had ice
19 cream and her uncle was a mayor who helped me
20 put a Wi-Fi hot spot in.

21 Q: You heard testimony from Ms. Clinton, I think,
22 related to -- I think she had concerns about
23 leave time as well. What's your response to
24 that?

25 A: She never had a problem with leave. When she



1 first got there, her house burned. And I let
2 her come and go as she pleased. When her
3 children were sick, it wasn't an issue. Matter
4 of fact, some of the time I had to, she would
5 try to work on -- I want to -- I don't know if
6 she took FMLA or was taking -- gonna take FMLA
7 or something, but I told her she could not work
8 while she was off, that she needed to be off.
9 And I would -- I said that to a lot of people:
10 When you're off, your off.

11 And I mean, you know, if her child -- she had
12 vertigo. And when she would have it, I'd tell
13 her to stay home, don't come. And sometimes
14 there were things that we could do by phone.
15 But if you were sick, I didn't want you --
16 anybody or not even her -- not anybody doing
17 something -- from home. You needed to be away
18 from the district.

19 Q: And what did you do for Ms. Clinton when she
20 adopted a baby girl?

21 A: She actually had -- she called me and had to
22 leave immediately. I didn't realize adoptions
23 were like this, that when you get the call, you
24 have to go. And so she had to go immediately
25 to do that, and called me one night and was



1 really excited about it. And, you know, I told
2 her, you know, congratulations, to let me know
3 if she got a little boy or little girl. I
4 don't know if that point she knew. And I even
5 let her bring her daughter when she needed to
6 come to work and didn't have anybody to care
7 for her. She would bring -- she brought her
8 daughter to work.

9 Q: And were those things that you were going above
10 and beyond to help her with?

11 A: I just thought it was the right thing to do.

12 Q: With regard to ---

13 A: And I also let her work from home when she
14 wanted to and needed to.

15 Q: Did you see the advice and opinion of
16 Ms. Clinton?

17 A: Always. She was from there and had her -- an
18 ear around that community, and she knew
19 community connections. I was an outsider, so
20 I didn't know who was related to who and who
21 was connected to who. But she did, and she
22 would know the history. Just like some of
23 those others. Like Jeff Gardner knew some
24 history and Anna Stroud knew some history and
25 Callie McConnell knew some history, the



1 individuals from the -- and board members had
2 history. And I would say that what they were
3 giving me was history lessons.

4 Q: And I believe it's already in the record, but
5 there is a letter from Brooke Clinton to the
6 Department of Education investigator Joel
7 Griggs on January 8th, 2016, and Ms. Clinton
8 reiterates some allegations related to lies and
9 manipulation. Did Brooke Clinton ever talk
10 with you even once about accusing you of lying
11 or manipulating in any kind of way?

12 A: No. And I am going to tell you, when I was
13 allowed to go back to work -- there was a
14 break. I was asked to take vacation by
15 Ms. Lawson. And then I was allowed to go back
16 to work for a few days. And I was very
17 cautious at that point about being alone with
18 any of these folks. I made sure I was in the
19 presence of Callie McConnell or someone else.
20 Brooke, I know she had to watch because she
21 made sure that Callie was not there and walked
22 in to my office. And I looked at her. I said,
23 Brooke, I can't meet with you right now. I
24 said we need to wait. I'm waiting for Callie
25 to get back. And she started crying. And she



1 looked at me and she said, Oh, Dr. Slayman, I'm
2 so sorry. You're gonna hear some -- that
3 people said some really bad things about you.
4 And I looked at her and I said, you can't talk
5 to me about this. I said but don't worry about
6 it. I said, I made a good hire when I hired
7 you. So don't worry about it. Let's talk
8 about something else. And we talked about
9 something else. There were -- I think it
10 was -- by that time, I was getting tons of
11 media requests, and I think it was that that we
12 moved on to.

13 Q: When Brooke Clinton ---

14 A: So I had no idea.

15 Q: And when Brooke Clinton had that conversation
16 with you, that would have been around the time
17 frame that she signed this grievance?

18 A: I'm assuming that grievance was signed in
19 September. And she had to have because she
20 made references people had said some very bad
21 things about you. I just -- those were her
22 words.

23 Q: Did she give you any inclination that she was
24 one of the people making these accusations?

25 A: I don't know if by that time -- she didn't tell



1 me she did, but I don't know if at that time --
2 I just don't know. I don't think -- I
3 didn't -- I'll put it to you like this: I
4 didn't have any inclination that she had said
5 those things. Well, I -- and I still don't
6 know what she said because there's not a
7 statement in there that indicates what her
8 written statement is.

9 Q: And with regard to Brooke Clinton, she's one of
10 the other signators on this grievance that
11 accuses you of a hostile work environment,
12 implications of ethical violations, and racial
13 and threatening remarks. Based on having
14 worked with Brooke Clinton, was there any basis
15 for her to make those accusations against you?

16 A: No. And she -- no, no.

17 Q: And let's talk about context of you working
18 with Brooke Clinton. There was some question
19 about a time she drove you to a hospital in
20 North Carolina?

21 A: She did.

22 Q: What were the circumstances of that?

23 A: I had -- Charlotte is a really big city, and
24 I'm not used to that. And I had gone up there.
25 My husband had gone with me and I had had a



1 mammogram prior, and there was an issue with
2 the mammogram. And I had to go back. And I
3 think she may have gone back with me. I had to
4 go back up some -- a CD of the as a results.
5 And Rob could not go. Rob was in Sumter. And
6 so I was trying to get directions of how to get
7 up there 'cause there was a lot of construction
8 going on on the interstate up there. There
9 always is. And I was looking for a back way to
10 go. And I knew Brooke knew how to go up to
11 Charlotte, and so I asked her how to -- what is
12 the best way to get up there. And she was
13 explaining it to me.
14 And she said -- she was one of the few that I
15 would even tell some things to. And, you know,
16 I told her I was going up to get a CD of those
17 mammograms and could she give me directions,
18 and she said, well, why don't I just take you.
19 And I said no, no. I said but I'd to have --
20 I said if you want to, ride with me. I said I
21 wouldn't mind having the company go up and then
22 you can direct me. And she said, no, I'm
23 getting ready to pick the kids up, 'cause it
24 was after the work day. And she said and I
25 don't want to change car seats out. You ride



1 with me. And I said are you sure. And she
2 said yeah. And this was in August. This same
3 month that -- right before all this stuff was
4 happening. And so we got in her car and she
5 took me up to Charlotte. I went and picked the
6 CDs up, and we were coming back.

7 And on the way back, I told her, I said let me
8 buy some ice cream for all of us. And we went
9 by McDonald's. She didn't, at first, want to
10 do that 'cause it was gonna ruin the kids. But
11 we did. We went to McDonald's. And I offered
12 to pay for her gas. And I was just thankful
13 that she helped me out. I didn't see anything
14 unethical about that. I didn't coerce anybody.
15 I didn't force anybody to do it. It was like
16 if I took you to the car place, you know, to
17 pick up your car or to drop it off or
18 something. She said she didn't mind, 'cause I
19 kept saying, no, no, you know.

20 Q: And was it the time where you were fearful that
21 you had breast cancer?

22 A: Yes. And they're still watching that spot.

23 Q: And was that -- what was your perception of
24 Brooke Clinton taking you, when you were
25 concerned about having breast cancer, to the



1 hospital?

2 A: She was really concerned. I mean, she told me
3 she was, that she was worried and all that.
4 And even when I went back for that week, that
5 was one of the things she asked me, was I okay.
6 And I told her don't worry about it, that I'm
7 gon' be fine.

8 Q: And is that type of the -- of relationship
9 something that you think would be indicative of
10 a hostile work environment?

11 A: No.

12 Q: With regard to Brooke Clinton, one of questions
13 I think that's been asked by one of the
14 attorneys here through the process was all of
15 this is gonna be about motivations. And one of
16 the questions was with Brooke Clinton. What
17 would be her motivation or motivations? Why do
18 you think she filed this grievance against you?

19 A: Of all the positive things that Brooke had,
20 Brooke could also be led, if they makes any
21 sense. And I don't know if she -- I don't
22 know. I wish I knew. You know, I know that
23 she expressed in her testimony that -- about
24 the sheriff's department, but at no point in
25 time did she indicate to me that she didn't --



1 felt for her child's safety in the school. And
2 I don't know if -- you know, I know she was
3 really good friends -- that senior staff was
4 really good friends, which is what I wanted
5 them to be with each other. Anna recommended
6 Brooke for the job. Shawn and Brooke were like
7 this, I mean, really tight (indicating). I
8 don't know if that was a piece of it or not.

9 Q: And I think through the testimony, it's clear
10 that Charles King, Jeff Gardner, and Anna
11 Stroud were essentially the initial grievants.
12 And Shawn Williams and Brooke Clinton are added
13 on. Did you know at any point that these
14 grievants, your senior cabinet, were meeting
15 essentially behind your back to file a
16 grievance?

17 A: I know I was told that, but as Mr. Winburn
18 would say, I didn't know that firsthand. But
19 I had an inkling. I was told by too many
20 people. Callie McConnell told me to my face
21 that that was going on.

22 Q: And was that around the time frame of
23 August 2015?

24 A: Yes, it was.

25 Q: And I think I used the word "mutiny" during the



1 opening statement of this hearing. Is -- what
2 are your feelings about that?

3 A: Sad. I'm very sad about all this. From the
4 testimony that I sat and heard and from the
5 statements that I read, other than Brooke's
6 statement, because I don't see an individual
7 statement from her and the fact that they said
8 under oath that they had met together several
9 times, it does look like it was a conspiracy or
10 a mutiny or collusion or whatever you want to
11 call it. That's the only conclusion that I can
12 draw.

13 Q: Next, I want to ask you about Dr. Charles King.
14 What was his role at the Chester County School
15 District when you supervised him?

16 A: That's an interesting story. I hired Dr. King
17 as the assistant -- associate superintendent
18 for instruction. He was actually the owner of
19 a gym prior to me hiring him. He taught online
20 classes at the University of Phoenix. But the
21 one thing that when I went in and was assessing
22 the district that I could tell was that I
23 needed someone to lead instruction or to help.
24 But I -- when you're a superintendent, you're
25 a specific kind of superintendent.



1 Dr. Littlefield was finance. But I was
2 instruction. And so even though I knew
3 Charles' background wasn't as strong, I knew
4 that I could help him and that he would be
5 okay. He had other qualities that I thought
6 would make him a good leader in that position.
7 And so interviews were conducted, and I had
8 principals and others that sat on that. And I
9 hired him in July of 2012. And one of the
10 reasons that I asked him when he was -- before
11 he took the job, as I looked at him and I
12 said -- and I told the board this -- that I was
13 hiring for that position and I -- because I
14 needed someone to help protect me, that the
15 situation up there had been so tumultuous for
16 a very long time with superintendents, and I
17 felt that Charles could be a good eyes and ears
18 for me with everything out there and help to
19 kind of be that second sense. And I told him
20 that. I said your job is to help me know
21 what's going on. Your job is -- I will help
22 you with the instruction part, but part of that
23 is for you to protect me so that we can survive
24 this environment.
25 And I told -- and the board had concerns.



1 Because he wasn't directly coming out of a
2 school and his degree was from an online
3 university and he was teaching at an online
4 university, so I had to convince them that that
5 would not interfere and all that stuff, and we
6 hired him. And I thought he was a good hire
7 for the position.

8 Q: And had you previously supervised Dr. King?

9 A: Oh, Dr. King and I worked together at the high
10 school where I was the principal. We had
11 worked there -- we had known -- well, I don't
12 know that we knew each other very well, but we
13 were both in Kershaw County School District for
14 a long time. And he applied for the
15 principal's job at North Central High School
16 when I did. I didn't know him at that point.
17 And I got selected as the principal.

18 Q: How would you describe your working
19 relationship during this time?

20 A: We had a pretty good relationship. He was
21 going through some personal stuff. And then
22 when the schools split -- remember when I told
23 you I was offered either the high school or the
24 middle school and I chose the high school, he
25 became the middle school principal. And then



1 we just kind of parted ways at that point.
2 But I joined his gym. I knew his wife really
3 well. They knew Rob and I really well. And we
4 ate dinner together. We, you know, took a
5 vacation together, that kind of stuff. I knew
6 his family.

7 Q: And tell us about that vacation.

8 A: Well, we went down to the beach one day. But
9 that was when I was in -- I don't know if -- I
10 was in -- I wasn't in Chester at that point.
11 About taking that -- we did that when I was in
12 Kershaw.

13 Q: And that was with your spouses?

14 A: With our spouses, correct.

15 Q: While we're on the vacation note. How soon --
16 well, let me backtrack even. Did Dr. King ask
17 you anything about a vacation at your beach
18 house?

19 A: Oh, yeah. He did that the end of July. He
20 said he might want to take a break and could he
21 use my place. And I told him absolutely if it
22 was not rented to -- because I rent it -- if it
23 was not rented, that I didn't have any problem
24 with them doing that and to let me know. And
25 I didn't think anything unusual of that 'cause,



1 you know. I just didn't. I would do that --
2 there's other people that are friends of mine
3 that I would do that for.

4 Q: And when you say the end of July, that would be
5 2015?

6 A: End of July 2015, yeah.

7 Q: So someone alleging a hostile work environment,
8 would they be asking to use your vacation home?

9 A: No. And he asked -- I will tell you this:
10 We -- in February of '15 when the
11 South Carolina School Boards Association
12 conference is held, our spouses rode down there
13 together, and he and I rode down there together
14 because we had scheduling conflicts to where,
15 you know, we had to go at -- like, we left in
16 the morning, and they came in the evening after
17 they got off work. And that was for a school
18 board's conference 'cause he served on the
19 board of trustees in Kershaw County at that
20 point. And it would not be -- it would not --
21 he went to conferences with me. If I have the
22 opportunity, I would take principals or other
23 district staff. And he -- Charles King was --
24 he went to Miami with me. Because I was trying
25 to expose him to as much curriculum stuff as,



1 you know, he could get to learn new things then
2 come back and bring information back and sent
3 him to conferences.

4 Q: And were you doing that ---

5 A: And we did that in 2015; yeah.

6 Q: Were you doing that at the request of Dr. King
7 that he had aspirations to be a superintendent?

8 A: I knew he did. And one of the things I told
9 him was that I would help him. Being in that
10 assistant superintendent position after not
11 having any position was an excellent
12 opportunity to be able to do that. If he went
13 up there and was successful, he stood a better
14 chance of being able to get another role. And
15 we talked about the fact that if I retired or
16 when I left there that me might be a good
17 candidate for that position.

18 Q: And Dr. King seemed to have a negative spin on
19 the frequency of how often you guys -- you and
20 Dr. King spoke on a daily in the workplace.
21 Was there anything out of the norm with the
22 frequency in which you spoke?

23 A: No. I would not say so. Because if I had a --
24 if I was really packed with my agenda that day,
25 sometimes I could go through the day and not



1 really see anybody but Callie. Sometimes I
2 could go through a week, depending on what was
3 going on. Especially around times of the
4 budget when I was dealing with the board, I
5 really didn't have time to really talk to
6 anybody or see anybody. But then there were
7 other times that I would need to see you if I
8 had questions or talk with you. So it varied.
9 I mean, it just depended. And I didn't
10 provide -- I mean, you wouldn't know whether --
11 why I was not seeing you or seeing you because,
12 I mean, that wasn't my role was to provide with
13 an explanation of that.

14 Q: And with regard to the five grievants, I'm
15 gonna backtrack and ask about all five. 'Cause
16 not all them, but I think at least some,
17 accused of hostile type of talk, a raised voice
18 of some sort. Did you shout at them or raise
19 your voice with any kind of hostile manner that
20 would substantiate these kind of accusations.

21 A: No, I did not. If my voice raised, I could get
22 excited about things if something -- and you
23 would hear it. But you even heard from
24 Ms. McConnell, who was right there, that she
25 didn't hear any o the -- what would be



1 accusations of yelling, screaming that was in
2 there.

3 Q: Page 4 of Dr. King's statement states, I like
4 to think that I'm ready to be a superintendent
5 and will have my own district one day. The
6 hear -- the fear I have is that she won't let
7 me leave or will block me from leaving. And
8 he's referring to you as the she. What is your
9 response to that statement?

10 A: I know for a fact that I saw a job in -- no,
11 Charles saw a job in Lexington 2, and he
12 e-mailed me about it and said I'm thinking of
13 doing this. What do you think? And I said I
14 think it's a good opportunity. Do it. To the
15 point that when I got the reference letter to
16 fill out for him -- it wasn't a letter. It was
17 a form -- to fill out for him, I sent him an
18 e-mail, and I said come talk to me about this,
19 'cause I wanted him to help me fill out the
20 reference letter to make sure I knew what the
21 job was -- 'cause you could have different jobs
22 in the district -- and filled that reference
23 letter out for him.

24 Also in 2015 in January or February, he applied
25 for the job as superintendent in Florence



1 County. There's four of them there, one of the
2 Florence districts. And we kind of
3 practiced-interviewed about what the topics
4 would be that you would be questioned about in
5 that type of interview. 'Cause it's a
6 different interview for a superintendent's job
7 than anything else. And he actually had a
8 pretty good -- some pretty good knowledge
9 'cause he served on a board. And he helped
10 select a superintendent, so he knew some of
11 that stuff.

12 But I gave him a good reference, and I made
13 sure I went back around and told him when I
14 talked to the gentleman that called me about
15 Charles. And actually I really thought Charles
16 was gonna get that job because -- and I told
17 the gentleman on the phone the last time he
18 called. I said look. I said -- 'cause he was
19 down to two candidates. And I said, If you
20 decide to hire Dr. King, please give me some
21 advance notice by calling me if you're gonna
22 make that recommendation 'cause I want to put
23 my board on standby.

24 So when he got to that top two, I went ahead
25 and we had a board meeting and met with the



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1 board. And we were planning a succession plan
2 for how we were gonna handle Dr. King's
3 departure. And we were gonna pull a principal
4 up and put an assistant principal in the
5 principal's job to do Charles' position until
6 the summer came. Because they were gonna put
7 that person in like right away. They didn't --
8 I think they had a -- Dr. Callicutt was the
9 acting superintendent maybe at that point. And
10 but the indications were they were gonna put
11 him in right away.

12 But he was devastated when he did not get that
13 job, big time. And now I know from the
14 testimony that he thought I didn't get it. But
15 the lady who was -- got job, she was an inside
16 candidate who had spent her whole career in
17 that district from student on up. So, I mean,
18 I understood after they made the pick.

19 Q: And Dr. King is one of the grievants who
20 accuses you of fracturing community relations
21 with selection of Defender and this breakfast
22 club. Did he ever even discuss those things
23 with you at any time prior to filing a
24 grievance?

25 A: No. And that's not true. I mean, the



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1 community members -- and I met with community
2 people on different things, for them coming to
3 me or me going to them, up until the day I was
4 asked to take vacation. I mean, I have stacks
5 of notes where my calender was filled with
6 these people coming in to talk to me. No. And
7 even when I went back those few days, I met
8 with people.

9 Q: Dr. King testified about leave time and
10 referenced sadly, I think, when a brother of
11 his passed?

12 A: Yes.

13 Q: Tell us about that circumstance.

14 A: Well, I know his -- I didn't know that brother
15 that passed, but I was really good friends with
16 one of his other brothers. And he told me that
17 Jackie had passed away. And I only went to a
18 couple of funerals in my time in Chester
19 County, and that was one. I went to that
20 funeral. I cleared my schedule and went down
21 there for that. It was in -- held in Camden,
22 South Carolina.

23 Q: And did you ever prevent Dr. King from going to
24 any funerals?

25 A: No. I told him to take the time that he



1 needed. And I saw him and his family, not just
2 his wife, but his sisters. 'Cause I knew all
3 them, and I know his brothers, and spoke to all
4 of them.

5 **MS. POLVI:** Would it be okay if we do a quick
6 comfort break?

7 **HEARING OFFICER:** Yes.

8 **(A break was taken.)**

9 **Q:** We're back on the record, and I'm gonna follow
10 up with things related to Dr. King. Mr. --
11 Dr. King described, and I quote, an
12 overwhelming environment of anxiety, unease,
13 and tension that is lingering and ever present.
14 What is your response to that statement?

15 **A:** I don't know why he would make those
16 statements. The -- even the other witnesses in
17 their testimony and Mr. Teal -- Judge Teal and
18 John Stiver know Charles because they worked in
19 the district with him. Charles would have been
20 comfortable enough to tell him if he was under
21 any kind of duress or stress or whatever. We
22 all knew each other well. We all took
23 conference trips together with spouses in that
24 district. He wasn't a stranger with them.

25 **Q:** Accurate to say that you deny ---



1 you can't do that. And then he said, well, I
2 don't have Internet access at my rental
3 property here. And I looked at him, and I
4 said, Charles, I don't even let the district
5 pay for my Internet access, and I do a lot of
6 district work on it. And I was getting ready
7 to leave for that trip and I looked at him and
8 I said, We're gonna have to discuss this when
9 I get back. And I didn't -- never got a chance
10 to discuss it. But he was upset. He was
11 upset. And he -- I made him bring it to me.

12 Q: And when you talk about that trip, is that the
13 Idaho trip?

14 A: Yes.

15 Q: And when you returned from the Idaho trip is
16 when this grievance is initiated?

17 A: Shortly after that; yeah. And I never got to
18 talk to him about it.

19 Q: And you reported your concerns to the board,
20 did you not?

21 A: I did.

22 Q: And what did you tell the board about your
23 concerns with Dr. King using the Mi-Fi?

24 A: That I was getting ready to have to deal with
25 that situation. 'Cause that's a pretty serious



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1 situation. You're dealing with taxpayer money
2 and State funds and that kind of stuff. And I
3 was gonna have to look into that. And I really
4 kept the board informed. I don't know if you
5 know this, but I kept the board informed on
6 everything that went on in that district. And
7 I told them all the same thing, each one of
8 them. Because that was one of the issues I had
9 when I went up there, is they were not getting
10 the same information.

11 Q: And who reported to you that Dr. King was
12 having an affair with one of his subordinates?

13 A: There were two times. The first time I was --
14 was early on, and it was Anna Stroud. And I
15 think that -- I really think she did not like
16 Dr. King being brought in. Because he -- they
17 knew that I knew him from prior work. And she
18 came over and told me. She said, do you know
19 where he's at? And I said, yeah, I know where
20 he's at. And she said, well, do you know who
21 he's with? And I said, well, no. I mean,
22 'cause I wouldn't. And then she made the
23 accusation that he -- and she said it -- he's
24 having an affair with Kelly Lunsford-Thomas.
25 And I just -- I thought, no.



1 And so I called him and said, man, I need to
2 talk to you about this. I said, are you having
3 an affair? And I told -- and he said no. And,
4 I mean, I didn't have any reason not to believe
5 him, you know. But I thought he needed to
6 know. And, you know, I let him know. I said,
7 well, you need to know. You need to come back
8 and talk to Ms. Stroud, I said, 'cause she's
9 made that comment.

10 Q: And is that the ---

11 A: And that second time was when that principal
12 called ---

13 Q: Well, before the second time -- let's stay on
14 this one -- is that -- was that the same
15 individual who has a disciplinary action with
16 regard to her certificate?

17 A: Yes. That's the one that has that document.

18 Q: And the -- I think the circumstances of that
19 was that -- the accusation was that Dr. King
20 allowed Ms. Kelly Lunsford-Thomas to use his
21 administrator registration essentially to
22 enroll in coursework that -- or say that she
23 completed coursework that she did not?

24 A: That is what's in the document at the State
25 department. That did not occur on my watch,



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1 yes, that's what's in that document.

2 Q: What were the -- what was the other
3 circumstance you were about the refer to?

4 A: The second time was -- and it was between
5 sometime in the spring to early -- I want to
6 say it was before graduation, so somewhere
7 between March and May or in May.

8 Q: Of what year?

9 A: 2015. I had a principal call me from one of
10 the high schools. And I was en route somewhere
11 when I took the call. And he told me did I
12 know that Dr. King was having an affair with
13 Jeannie Ligon. And I said, no, I did not. Are
14 you sure? And he said yes. And I said, well,
15 let me tell you something. I said -- he said,
16 My teachers know. We've got proof. And I
17 said, well -- I said, Once you get your proof,
18 I said, then I will deal with that. I said,
19 but I am not going to address anything that I
20 don't have any kind of evidence on. And then
21 I dropped it at that point. I mean, I wasn't
22 gonna entertain it.

23 Q: With Dr. King, he wrote a statement and
24 provided testimony earlier in this hearing with
25 regard to a grievance, and he alleged as the



1 grievance states, a hostile work environment,
2 implications of ethical violations, and racial
3 and threatening remarks. What -- did you,
4 indeed, do any of those with regard to
5 Dr. King?

6 A: No, I did not. And Dr. King also said under
7 oath -- 'cause I heard this the other day when
8 he testified -- that I did not make any racial
9 remarks. I mean, I heard him say that, if I am
10 remembering this correctly.

11 Q: And how would you describe -- up to this
12 grievance, how would you describe yours and
13 Dr. King's working relationship?

14 A: I thought we had a really good relationship
15 next to Callie McConnell. He was very close to
16 me. I brought him in to protect me in that
17 environment, to help me stabilize that
18 organization. And I thought I could trust him
19 with everything.

20 Q: What was your reaction when you found out that
21 he was one of the individuals making these
22 accusations against you?

23 A: Out of all of them, every one of them, he would
24 have been the last person that I would ever
25 have suspected of doing that. And I was hurt.



1 I wasn't even mad or angry or any of that. I
2 was hurt. And I remain that way for a very
3 long time.

4 Q: And these grievants, in different levels,
5 depict you as a hostile person?

6 A: Yep, they do.

7 Q: Is that the type of treatment that you gave
8 these individuals?

9 A: No, ma'am.

10 Q: And have you taken any retaliatory action
11 towards them even though they've done this to
12 your career?

13 A: No. I have not said a word. When I walked
14 away, I walked away.

15 Q: And you described your reaction as hurt. Is
16 that the reason why you resigned?

17 A: I resigned for a lot of things. I didn't know
18 where my health was going at that point. My
19 dad was really sick. I didn't know how sick.
20 I knew he was really sick, but I didn't -- I
21 don't think I believed he was as sick as what
22 he really, really was. And I was having to
23 make trips to Columbia. But I also knew that
24 with having five individuals who were part of
25 your leadership team filing this complaint,



1 even if the complaint got settled, that I could
2 never work as the superintendent. Because if
3 I tried to criticize someone or correct
4 behavior or make any kind of remark that was
5 anything that was -- could be perceived as
6 negative, then it would be seen as retaliation
7 and my hands would have been tied. And I knew
8 that. And I love that place. But I knew I
9 could not do that job.

10 Q: And in that type of context ---

11 A: And I had the votes to stay. You need to know
12 that.

13 Q: So on that note, fair to say that your
14 resignation was entirely voluntary?

15 A: Yes, it was. And I went -- and nobody knows
16 this except the board, because they were not
17 there. The night that I resigned, I went and
18 met with the board, which I think was highly
19 unusual, and talked with them. And it was --
20 and they knew because I was pretty sad. And
21 some of them cried, and I cried. And then I
22 left.

23 Q: And isn't it true that once this grievance was
24 filed, there could have been no other result
25 than the end of your employment one way or the



1 other because five of your senior cabinet had
2 made it impossible for you to do your job?

3 **MR. WINBURN:** Leading.

4 **HEARING OFFICER:** Rephrase your question.

5 **Q:** Was your job possible once this grievance was
6 filed?

7 **A:** No, it was not. In my view, it was not. Even
8 with the board's support, I do not believe it
9 would. And I'm gonna tell you, it was a circus
10 up there. By the time all this was taking
11 place -- Ms. James was telling you the truth.
12 By the time this took place, social media, the
13 other media outlets were rampant. I had my
14 picture put on a milk carton and put out there
15 on social media: Where is she? I had my
16 picture put out there with a witch's hat. It
17 was incredible.

18 There were three or four fake Facebook accounts
19 that were out there. There was information put
20 out there that was just vicious, really
21 vicious. I was being followed. My picture was
22 taken at my vehicle. Wherever my vehicle was,
23 pictures were taken and posted on Facebook.
24 The location of my house was put out there.
25 And my husband worked in Sumter. This is what



1 bothered me. He traveled there every day and
2 then traveled back, so he was gone a lot. And
3 then he also did travel. And it was a
4 little -- I would say a little unnerving to be
5 there knowing that this was going on. I had
6 television crews show up at my home, banging on
7 my door. I was followed to eating places.
8 And, no, not just the Country Omelet. You
9 know, it was really unsettling. And what I did
10 not know until a year or so ago, because my
11 husband did not tell me, is my husband was
12 being followed. He was being followed by law
13 enforcement from up there and the other people
14 in the community. They really -- it was
15 unbelievable. It was incredible.

16 Q: And did you observe sheriff's office vehicles
17 following you?

18 A: I did. They followed me, and they followed
19 some of the board members. And I -- they
20 followed my husband. And I know that because
21 Rob told me a little while ago that it was not
22 unusual for him to come home from work and then
23 follow them down the interstate. He'd cross
24 the bridge to come into the neighborhood. And
25 instead of coming into the neighborhood where



1 we lived, he would go a different direction.
2 And they followed him everywhere, even to the
3 gas station. And he looked at one of them and
4 said, do you need anything? And the guy said,
5 no, no. You putting gas it? And Rob said
6 yeah.

7 I mean, it was -- but the stuff on social
8 media -- I have family in Texas and family in
9 Tennessee. And all this stuff was there. It
10 was in newspapers in Washington and Virginia,
11 Georgia, all over South Carolina articles about
12 what was -- had happened. Google me. Just
13 google me. If you google me, you'll see.

14 Q: What was your understanding of the goals of
15 this process? What were the three things?

16 A: What? Help me.

17 Q: What was Dr. Hughes' goal for this process?

18 A: I -- and I know Mr. Winburn's gonna say it's
19 hearsay. But I was told that he was going to
20 get rid of me. Either I would -- fire me was
21 preferable. He was going to take my license,
22 and he was going to try to put me in jail.

23 Q: With regard to these circumstances that you
24 just described, were those reasons -- other
25 than the allegations, the reasons why you



1 resigned?

2 A: The reasons that I just told you?

3 Q: Yes.

4 A: Yes. It was gonna be an untenable working
5 situation. It was not gonna benefit the
6 district at all either. It was in an uproar.
7 The whole community was in an uproar. And I
8 got the -- the only good thing I got out of
9 this was I got to spend some time with my dad
10 before he passed away. I did get to do that.
11 So that was the benefit out of all this.

12 Q: I want to ask you some questions about Shawn
13 Williams, one of the other grievants. What was
14 her position at the time you were her
15 supervisor?

16 A: She was there when I got there. She was the
17 director of personnel.

18 Q: And how long were you her supervisor?

19 A: Until I resigned in August of -- September of
20 2018 [sic].

21 Q: With regard to Shawn Williams' testimony, the
22 only hostile work environment allegation that
23 she testified to was a statement that she
24 alleged you made in 2013 ---

25 A: Right.



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1 Q: --- and that -- I want to just kind of ask:
2 What do you recall from that circumstance?

3 A: I know I heard her under oath say that she said
4 that I made that remark that I would slit her
5 throat. I deny that. I did make a remark.
6 I'm not gonna deny there was a remark, but I
7 don't use that verbiage. I believe that the
8 remark I would -- could have possibly said
9 would have been something to the effect of, you
10 know, I'll have to kill you. But I wouldn't
11 have done it in a vicious or mean way. But
12 even Sandra Stroman told you that, you know, I
13 would -- I'd make that remark. And you
14 especially did it when you were saying
15 something -- you said, now, I'm gon' tell you
16 this. If you repeat it, I'm gon' have to kill
17 you. So in that kind of context. I do know
18 Shawn did come to me. I ---

19 Q: Let me pause there so it's clear on the record.
20 What type of context?

21 A: I don't remember what that context was. I know
22 that Shawn came to my office.

23 Q: Well, let me backtrack. Is it -- were you
24 actually going to kill her?

25 A: Oh, Lord, no.



1 Q: Had you threatened anybody in any real sense of
2 the word?

3 A: I mean, look at me. No. No, ma'am.

4 Q: And so the context -- and I don't want to put
5 words in your mouth, but was it a colloquial
6 saying ---

7 A: Yes.

8 Q: --- versus an actual threat?

9 A: Yes, yes, yes.

10 Q: Okay. Continue.

11 A: So anyway, she came to me and told me that she
12 didn't appreciate that comment. I don't
13 remember her exact words. And I apologized to
14 her profusely because, you know, I just don't
15 want to hurt anybody's feelings like that.
16 And, you know, she told you I'd never said it
17 again. To the point that, you know, I
18 nominated Shawn for the South Carolina
19 Administrator of the Year. I'm not sure
20 nobody's aware of that. I made that nomination
21 for her to be that in either '14 maybe. She
22 didn't get it, but I nominated her.

23 Q: So based on that, is it fair to say that you
24 supported Shawn Williams in her position?

25 A: Oh, I did. I did.



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1 Q: And the only time you made a statement that she
2 testified to finding offensive, you apologized?

3 A: Oh, absolutely. You know, it's not -- I'm not
4 too good to do that. I make mistakes too.

5 Q: With regard to the testimony, I believe,
6 Ms. Williams testified to the same that during
7 the summer of 2015, you and she had had
8 conversations about her pay and that she was
9 frustrated with her pay?

10 A: She was. She was very frustrated with her pay.
11 And I really wanted to try to do something
12 about that for both she and Anna. And I went
13 to the board in executive session. That is
14 when they -- when I got there, they were called
15 directors. And what I wanted to do was raise
16 them to executive directors. And that is what
17 the board agreed to do. But the board would
18 not give any kind of salary increases at that
19 point. And part of that reason was we were
20 getting to do this salary study, and so they
21 didn't really want to mess with anybody's pay
22 at that point because -- until the salary study
23 showed where everybody was gonna be placed.

24 Q: And had you and Ms. Williams spoken about that
25 during the summer of 2015?



1 A: About her pay? I don't think -- I think I took
2 that to the board in 2014 maybe. It was
3 prior -- if it was in 2015, it would have been
4 early 2015. It wouldn't have been around the
5 time of all this going on.

6 Q: And from the time that you had brought that
7 concern to the board, Ms. Williams' pay had not
8 changed?

9 A: No, no. It was not -- and it was not
10 competitive with other districts.

11 Q: With regard to the latter part of summer 2015,
12 was there ever a circumstance where you spoke
13 with Ms. Williams about her not being present
14 at work?

15 A: I did.

16 Q: What occurred with that instance?

17 A: And that was not something that she was pleased
18 with either. I had a principal call me, and I
19 was looking for her. So I called -- because
20 there was some situation going on in the
21 school. I don't even know what it is now. And
22 I called her office, the -- her assistant in
23 her office and asked her where she was at, and
24 she said that she wasn't there. And I said
25 well, you know -- 'cause I thought, well, is



1 she in the district today. And the individual
2 said no, that they didn't know where she was
3 at. And I said, well, I need to get in touch
4 with her.

5 And so then the secretary told me that she was
6 off, and I said -- I thought, I didn't know you
7 were off. And I said, well, I didn't realize
8 that. And I got word to her secretary. I said
9 please tell her to call me. And I told her, I
10 said, Shawn, I didn't know that you were not
11 here today. You didn't ask to be off. I said,
12 I didn't know that. And we got a situation
13 here. And then about five minute later, her
14 secretary came around with a leave form, and I
15 told her secretary, I said, no. You just keep
16 this and take it back. And I told Shawn on the
17 phone I -- we will talk about this when you
18 come back to work.

19 Q: And what was your concern?

20 A: That I didn't know where she was at. Because
21 normally what the situation is, she didn't have
22 an assistant at that point in time, and so I
23 was kind of the assistant HR if somebody wasn't
24 there. And so I needed to know that kind of
25 stuff so I could handle situations. And the



1 principal -- when the principal called me, he
2 had been looking for her.

3 Q: And did you relay to Ms. Williams at that time
4 that she could have been written up for
5 no-call/no-show?

6 A: I didn't have to do that. She knew that. She
7 was in HR. And she had dealt with other
8 employees with that same situation, so I knew
9 she was aware of that. She knew it was not a
10 good thing.

11 Q: With regard to Ms. Williams and all of the
12 senior staff, were there times that they would
13 complain about each other to you?

14 A: Oh, lord, yes. They did.

15 Q: How did you respond when that occurred?

16 A: None of them were immune from doing that.
17 Charles talked about Shawn. He talked about
18 Brooke. He talked about Anna a lot. He talked
19 about Jeff. Jeff talked about Anna mainly a
20 lot. Some with Brooke. Some with Shawn. He
21 talked about them when he was a principal.
22 But, you know, I listened. And then I sent
23 them back. If they had a -- I -- they had to
24 work this out. And I would look at them and I
25 would listen to them. And Shawn would complain



1 about Anna. And I just sent them back and I
2 said you got to go back and work it out. I
3 said you guys need to sit down and talk about
4 this. And -- you know, 'cause they were
5 adults. That's what they need to do. And
6 sometimes they wanted me to intervene. Make
7 this person do X. And I would say, no, you go
8 talk to that person and, you know, get them to
9 do whatever you need them to do. They'll do
10 it. Just talk to them.

11 Q: And did Dr. King ever request to you a change
12 of who Ms. Williams should report to?

13 A: They did. He did. He wanted -- he had a
14 couple of scenarios. One scenario was him over
15 everybody in an umbrella. And then -- oh, and
16 besides the other part of the talking about
17 each other, the principals did it too. Because
18 they complained about -- especially Anna and
19 Shawn and sometimes Charles and Jeff, depending
20 on what it was, but mainly Anna and Shawn and
21 Brooke.

22 When I heard Dr. Bain say what she said
23 yesterday, I was just going, oh, my Lord.
24 Anyway but, yeah. And then the other scenario
25 was for he and Jeff to divide up the building.



1 Q: And did Dr. King propose that he should
2 supervise Ms. Williams?

3 A: I don't remember whether he wanted to supervise
4 Ms. Williams or Ms. Stroud. But one of them
5 was gonna get Ms. Williams, and one of them was
6 gonna get Ms. Stroud. And then at one point,
7 he was gonna to do everybody. As a matter of
8 fact, I had an associate superintendent who
9 passed away while I was there, and he suggested
10 that he take over all of it at that point. And
11 I told him, no, that we would bring somebody
12 in.

13 Q: With regard to Ms. Williams' aspirations to
14 apply for a different position, how did you
15 respond in regards to references?

16 A: I gave her references. I gave -- she told
17 me -- well, I sent her an e-mail because I saw
18 the job in Lexington-Richland 5 come open. And
19 I said, hey, you might want to look at that.
20 What I didn't know was it was the last day to
21 apply. And so she needed a reference letter,
22 and she asked me if I'd do the reference
23 letter. And that was on like a Thursday or a
24 Friday. And so I went in on a Saturday and did
25 a reference letter for her and e-mailed it to



1 her. And she thanked me for her reference
2 letter.

3 And then later on I asked her how her interview
4 went. And she felt like it didn't go as well
5 as it could have been and didn't get the job
6 but I don't -- I mean, I don't blame her for
7 applying. I mean, you know, if you looked at
8 her salary, she certainly had every reason to
9 seek to do better, to go to a larger district.
10 'Cause that's usually what you do is you go to
11 larger districts.

12 Q: And would you -- you pointing out that
13 position, would that have meant that she would
14 have been paid more in that new job?

15 A: Oh, yeah. Definitely. Chester County had
16 like -- usually a district's paid by the size
17 of the students and the responsibilities. And
18 Chester County only had 5400 kids at that
19 point. And it was Lexington-Richland 5, which
20 is huge. I don't even know how many students
21 they have, but it's large.

22 Q: With regard to the other reason why you had
23 brought that up is had Ms. Williams spoken with
24 you about how she wanted a shorter commute from
25 home?



1 A: I know that her ultimate -- I don't know if it
2 is now. But I knew that one of her aspirations
3 was to get to Greenwood County. I think that
4 is where she -- for whatever reason, she kept
5 talking about Greenwood, one of the districts
6 in Greenwood and going there. And I'm sure --
7 you know, her mom had had cancer and had been
8 fighting cancer, and at that point, had done
9 very well. And she had always talked about
10 going there. And I don't blame her.
11 She was living in a rental home in Chester and
12 drove home every weekend. And that's a haul
13 because there were no direct ways to get from
14 Chester to Greenwood. You had to go all back
15 roads. And I actually kind of worried about
16 her a lot of time when she was driving those
17 back roads to go home, especially if we had
18 inclement weather. I always liked to try to
19 let the people that did not live in the county
20 get out of there early like Charles back to
21 Camden or her down to Greenwood. I told them
22 to get out of that place and get home.

23 Q: And with regard to Ms. Williams, the one time
24 that she brought in her testimony -- as being
25 concerning and that she brought to your



1 attention in 2013, fair to say that she did not
2 do anything else with regard to that concern
3 until she filed a grievance two and a half
4 years later?

5 A: And you heard that in her testimony. She said
6 that was the only time that it happened.

7 Q: And outside of that isolated kind of incident,
8 did you have a good working relationship with
9 Shawn Williams?

10 A: I did. I relied on her. She did the -- most
11 of the legwork for the -- you know, she did the
12 legwork in HR. And, you know, other than
13 her -- the complaints about her effect with
14 folks, I mean, she did a good job.

15 Q: And there's some reference to several
16 statements kind of in the record. Do you
17 dispute the other statements that have been
18 referred to by other people outside of Shawn
19 Williams with the one?

20 A: With the one statement being made?

21 Q: Well, and I can clarify.

22 A: Please.

23 Q: A threatening statement is that do you dispute
24 that you made any type of -- even it could be
25 perceived threatening verbiage to any of the



1 other grievants?

2 A: I do. And I'm gonna tell you why. It has been
3 brought up several times that Chester County is
4 a small county. And it is. If the environment
5 that has been described here was occurring in
6 that county, the board members would know. The
7 brothers and sisters and aunts and uncles that
8 are employed in that district would have known.
9 Way before I was sitting here, there would have
10 been issues up there. I'm telling you,
11 everybody's -- Reverend Bill was very right
12 when he told you that he had a lot of family
13 members inside that district office and in
14 those buildings. I mean, he's related to about
15 everybody.

16 Q: And Shawn Williams is one of the grievants who
17 signs and accuses of a hostile work
18 environment, implications of ethical
19 violations, and racial and threatening remarks.
20 Did you subject Shawn Williams to those
21 statements?

22 A: No. Well, other than one that I told you
23 about.

24 Q: And you've explained the context?

25 A: Yeah.



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1 Q: Next is Jeff Gardner. What was Jeff Gardner's
2 position when you supervised him?

3 A: Jeff Gardner, when I got there, was the
4 principal at Chester High School.

5 Q: And how long was he the principal?

6 A: For me, only until -- when did Blair pass away?
7 Jeff was hired in July of -- or August of 2013.

8 Q: And that would have been a promotional
9 opportunity for him?

10 A: Big time. He had been trying to get to the
11 strict office. And he -- I selected him for
12 that job.

13 Q: And were you aware of him applying for the job
14 that you obtained, superintendent?

15 A: No, ma'am. I wish. I knew that Jeff had
16 applied for the superintendent's job in
17 Chester. But I did not realize, until the
18 testimony that I heard, that it was when I had
19 applied. I thought that it was -- you know,
20 they had -- they'd gone through an interim and
21 a superintendent. I just didn't realize that
22 it -- I knew he had applied, but I didn't
23 realize that it was immediate. It was like --
24 I thought maybe he had applied and then there
25 was a second round when I applied. I knew it



1 was somewhere in there, but I didn't know it
2 was close as when I found out when I was
3 sitting here listening. I wish I had.

4 Q: And in the record, you'll see that Jeff Gardner
5 was documenting, at least appears to be, the
6 long laundry list of things that he had issues
7 with for an extended period of time. Were you
8 aware of that occurring during the time line
9 that we -- that's already in the record?

10 A: I really didn't think about it. Didn't have
11 any reason to. I probably should have.
12 Because I will tell you that one of the things
13 that -- and this was just in a general
14 conversation with him at one point and with
15 Anna at one point. Anna told me at one point
16 that she had helped to help a superintendent
17 out the door. I don't know if it was Barry
18 Campbell. I think it was Barry Campbell, but
19 I could be -- I think it was Barry Campbell.
20 But and then Jeff had told me about the
21 situation with the principal at Chester High.
22 You know, I was -- when I took that job, I was
23 30 years into education. That kind of thought
24 never crossed your mind. I mean, I figured
25 parents had come in and tape you and document



1 you and all that kind of stuff. I just never
2 thought a member of my senior staff would do
3 that and not talk to me. I had been in a large
4 school district and supervised lots of people.
5 I just never thought that.

6 Q: And Mr. Gardner accuses you of creating an
7 environment that made him seek medical help?
8 How would you respond to that?

9 A: I don't -- that is Mr. Gardner's statement. I
10 will tell that you Mr. Gardner is an active
11 mountain biker. He did that every time he
12 could on the weekends. I do know that he hurt
13 his leg one time doing that. And, I mean, I
14 never questioned anybody's medical stuff.
15 He's -- you know, he's also a -- I want to --
16 if I'm right about this, I know he's -- I don't
17 know if it's an expert. He's a -- he's either
18 a black belt or a brown belt or a white belt or
19 whatever you can be in karate. He's very
20 active. You know, and I know we discussed that
21 he had developed -- he had to have his eyes
22 checked and he had -- I didn't see anything
23 unordinary -- inordinary, is guess, is what I
24 would say. He never told me about any medical
25 help other than when you'd have to go to the



1 doctor or he had high blood pressure or
2 something like that.

3 Q: And did you subject him to a hostile work
4 environment, implications of ethical
5 violations, and racial and threatening remarks
6 as signed by him and the grievants?

7 A: No.

8 Q: With Mr. Gardner, I think if I recall
9 correctly -- and I think the record would
10 reflect which witness stated it. But one of
11 the witness -- and I'm pretty sure it was
12 Mr. Gardner -- testified to some kind of --
13 somehow it was a threat for you to have a
14 concealed weapons permit. Give context for
15 that.

16 A: We were all sitting -- I remember that. We
17 were all sitting in my office one day. And I
18 don't know how we got on the subject of our
19 homes and CWPs. Because Anna Stroud has a CWP.
20 Charles King has a CWP. I don't think Jeff
21 Gardner does. But what he was telling me, I
22 said, you know, really, how do you -- you know,
23 I'm thinking of getting a security camera
24 system or an alarm system. I have the alarm
25 system, but I never armed it. And I was



1 thinking about getting a camera system. And he
2 said, well, I'll tell you what I do. I take a
3 \$20 bill and I lay it on the counter in my
4 home. And if that \$20 bill is not there when
5 I come in that door, I know somebody's been
6 there. And I thought that was pretty smart.
7 And I said, well, I have CWP. And he said
8 could you ever use it. And I said, let me tell
9 you, if I'm in my house and it's dark and you
10 come in my house and I don't know who you are
11 and I feel threatened, I said I could. I said,
12 because they tell not to get a CWP unless you
13 have the wherewithal to do that. But I
14 remember that because of that \$20 bill.

15 Q: And context was conversation between several
16 people talking about home safety?

17 A: Oh, my lord, yeah. I don't even know who else
18 was in there. Yeah, yeah. And, you know, I
19 have the CWP, but I never carry a weapon. I
20 don't carry a weapon on me. I don't carry a
21 weapon in my car. And like Allan Teal said, a
22 bunch of us from Kershaw County in my staff and
23 in my department, we all got together on a
24 Saturday afternoon and went down there and took
25 the test and got the CWP.



1 Q: With regard to Jeff Gardner's performance, what
2 was your assessment of his performance as the
3 position after being principal?

4 A: When Jeff first came in, things were not
5 becoming as complicated as they were. But we
6 ended up starting a building program, and the
7 security stuff, and then he had his normal
8 stuff to handle. And I will say that he
9 struggled to keep all the balls in the air, so
10 to speak, and to complete projects and stuff
11 and to get back. Like, they would have things
12 that he would have to take care of, but it
13 would -- for whatever reason, there were just
14 too many balls in the air to handle. So he
15 struggled with that. And he and I had several
16 conversations with that because sometimes there
17 would be things that -- the principals would
18 call that he hadn't gotten back to them on or
19 that I was having to get information back to
20 the board on. And he got really frustrated.
21 And that whole -- I don't remember the details
22 with the Grazier Rhea stuff, but the Grazer
23 Rhea stuff was one of the things. 'Cause the
24 board just kept asking for more and more
25 information and, you know, you don't question



1 a board. We're here to provide a service to a
2 board so they can make a decision. And I know
3 he got frustrated with them because it was sent
4 back multiple times.

5 But also in his defense, the lady who was -- or
6 man -- the individual who was leading that
7 charge didn't do their work in a timely manner.
8 Like, they had a year before to get this
9 information, and they wanted it all at once,
10 and the board delayed.

11 Q: Did Dr. King provide information to you saying
12 that other individuals should report to him or
13 preferred to report to him?

14 A: He did. And I will tell you exactly who.
15 Dr. King came to me and told me that the
16 director of maintenance and -- I don't remember
17 the title -- the attendance person for the
18 district, instead of going to Jeff, they were
19 coming to him with their work issues -- and
20 IT -- and that maybe I needed to consider
21 putting those positions under him. And I did
22 split the IT position between Mr. Gardner and
23 Dr. King because it did have an instructional
24 and an operational task. But I did not move
25 the attendance or the maintenance person under



1 Dr. King.

2 Q: And with regard to feedback to your senior
3 staff, how did you provide it, both good and
4 bad?

5 A: I really liked -- I would either do it on the
6 phone. I don't think that was as much. You
7 know, we e-mailed; we texted; we did phone
8 calls; and we met in person.

9 Q: And are you -- there's different types of
10 leaders. How would you describe yourself as a
11 leader with regard to people who directly
12 report to you?

13 A: My plate was full. And I delegated. I am a
14 delegator for a couple of reasons. One, 'cause
15 my plate was full. But number two is you don't
16 learn unless you are responsible for a task.
17 And I was very aware that I needed for them to
18 have some -- it's a terrible word -- "power"
19 and not let other people think that I was the
20 one that they could go to. They needed to go
21 to them and know that they held the authority
22 to do that. I'm also direct. I mean, if I see
23 something that's not appropriate or right or
24 whatever, I'm gonna ask you to fix it, you
25 know. And if you need resources or help, I'll



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1 give you that too. And that's what I told the
2 board when I was hired.

3 Q: Give context for -- or what is your
4 recollection of this matter that related to a
5 parent complaint and the cheerleading coach?

6 A: The principal called me from Chester High
7 School. This originated out of Chester High
8 School. Well, you know, they called Callie and
9 got ---

10 MR. WINBURN: Hearsay.

11 THE WITNESS: Well, however, Callie became aware
12 that a parent was coming over to see us from
13 Chester High School. And when the parent came
14 later, she was distraught, and so was the kid.
15 It was a female. And my door was open --
16 that's how Callie knows some of this -- and the
17 parent indicated that was there was
18 inappropriate things that were taking place at
19 the school. And the principal -- you're gonna
20 have to ask me a different way 'cause he's gon'
21 say it's hearsay. But the principal told us on
22 the phone. Callie gave the phone to me, and he
23 talked to me. And he told me that the parent
24 was headed over there, that there were some
25 allegation being raised of an inappropriate



1 behavior from the cheerleading coach. I didn't
2 know the depth of it until the parent showed
3 up. But it -- there was enough that the parent
4 wrote a statement. And I gave that statement
5 to Callie, and I called Dr. King and
6 Mr. Gardner in, because I stayed with the
7 parent while the parent was writing the
8 statement, and I told Mr. Gardner and Dr. King
9 to go over there with the principal and to see
10 what was going on and to interview the kids and
11 see. I mean, 'cause we had no clue. The
12 allegation was pretty serious.

13 Q: And what was allegation?

14 A: That the cheerleading coach was having the
15 kids -- basically using the kid and taking the
16 kid to places to meet up with another
17 individual. And who was not on staff at the
18 school.

19 Q: And was that of a sexual nature?

20 A: Both -- the one instance was a sexual nature.
21 But the -- she had provided other information
22 and it took place -- it is a romance kind of
23 thing. Yes, sexual nature and romance.

24 Q: Was there anything wrong with what you were
25 asking Dr. King and Mr. Gardner to do?



1 A: No. I had them do things like that before.
2 I'd sent them out to schools to investigate.
3 You know, they investigated -- I can remember
4 that they investigated an employee one time for
5 grade tampering. And so it wouldn't be unusual
6 for me to have them do it if Ms. Williams
7 wasn't there. And I'm assuming I did this at
8 this point because Ms. Williams must not have
9 been there. Otherwise, she would have been the
10 first point of contact.

11 Q: Was Mr. Gardner one of the senior staff that
12 came to you with complaints about other people?

13 A: Oh, they all did.

14 Q: And did other people complain about Mr. Gardner
15 to you?

16 A: Yes.

17 Q: How would -- there's -- essentially, you have
18 a senior cabinet. How would you describe the
19 strength or weakness of the leadership team?
20 Were they a weak leadership team, average, or
21 above that?

22 A: I think I had some who were not as strong as
23 individuals that when I was in a senior level
24 cabinet. Might not have been as strong as some
25 other folks that I've worked with. But and



1 some of them were stronger than others,
2 depending on what you were dealing with at that
3 point in time. So I would say that they went
4 the spectrum.

5 I mean, you know, in terms of knowledge of
6 their job, you know, I think Anna probably had
7 more issues than others. Jeff was the being
8 able to balance the balls in the air and all
9 the job tasks and complete the tasks. Shawn
10 was pretty good at what she did. And Brooke
11 was pretty good at what she did. She just
12 sometimes -- sometimes you had to reign her in.

13 Q: And with regard to Mr. Gardner, I don't think
14 I've asked this yet. But if I have, I
15 apologize for the repetition. But that
16 Mr. Gardner's one of the individuals who signed
17 excusing you of a hostile work environment,
18 implications of ethical violations, and racial
19 and threatening remarks. Did you subject
20 Mr. Gardner to such an atmosphere?

21 A: No, ma'am.

22 Q: The beginning parts of Mr. Gardner's grievance
23 where he identifies his personal feelings on
24 things is a whole page and more about security
25 and Defender. Did Mr. Gardner ever relay to



1 you any opposition to private security being
2 placed in the school district?

3 A: No, ma'am. He was the primary one to help
4 handle this. He did the calling of the
5 districts to find out who had this in place.
6 He worked with me with the attorneys to
7 determine how we could do this and if it was
8 legal to do this.

9 Q: And with regard to the pay of the individual
10 who would be the head of security but also an
11 employee of the district, Mr. Gardner -- and I
12 believe some others, but Mr. Gardner --
13 testified pretty extensively about why he had
14 a problem with the pay of that individual.
15 What is your response to that testimony?

16 A: Well, there's two things. I don't know why he
17 would have an issue with the pay. We discussed
18 it. We hadn't discussed the exact salary, but
19 we discussed what we would advertise at. We
20 didn't know the kind of individual we were
21 gonna be hiring. The salary that was placed
22 there, as the board members who have testified
23 have told you, was a base salary. If the
24 position was going to be hired by the security
25 group, you don't get benefits. It's just a



1 salary position with nothing in there. But we
2 ended up hiring an individual who was in the
3 South Carolina -- because I tried to put this
4 position initially in the South Carolina
5 retirement system and could not do that. And
6 so when the individual who ultimately got the
7 job, he was a State employee and was in the
8 South Carolina retirement system, so we had to
9 put in benefits and everything with that. And
10 that's like a 24 percent or 20-something
11 percent increase to do that on that salary.
12 And I went back to the board when they --
13 Mr. Gardner and Dr. King are the ones that
14 viewed people for the job -- I didn't even sit
15 in on it -- and the person from Defender, the
16 security group. And when they brought me the
17 name of the individual they recommended, I had
18 asked them, I said, is this the best candidate
19 for the job? And they said yes. And then when
20 I talked to this gentleman, he did not have
21 enough years to be retired and needed the
22 retirement to get to the PORS retirement. He
23 was a police officer. And so I went back to
24 the board and I said, look, this guy's -- we're
25 gon' have to make for him a Chester County

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1 School District employee for him to do this.
2 And we did. There was nothing underhanded with
3 that.

4 Q: And with the salary, accurate to say it was in
5 the 60,000 range?

6 A: Yes. And the reason it was is also because
7 whenever ever you bring an employee in,
8 especially into a -- the school district, you
9 look at their years of experience. And we
10 could also look at his educational level. And
11 so he was placed -- I think he had a bachelors
12 degree maybe. And on a -- because there wasn't
13 a specific slot for a chief of security, we
14 used the salary schedule for the career center
15 and -- because they get their -- a masters
16 degree paid whatever. Anyway it was
17 comparable. And I asked Shawn and Anna about
18 that pay, was that comparable for his years of
19 experience and his degree. And they told me
20 yes.

21 Q: And looking at ---

22 A: But the board knew.

23 Q: And looking at the comparison of pay, this
24 person who was being hired would be the head of
25 security?



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1 A: Yes.

2 Q: And that head of security's pay was still less
3 than the five people who grieved, isn't it?

4 A: Oh, yes. He was on a teacher's pay.

5 Q: So for Mr. Gardner to have a concern about
6 someone else's pay whose far less than his,
7 does that have any basis for a hostile work
8 environment?

9 A: I don't understand why he would be concerned
10 about it. He made more than even Shawn or
11 Anna.

12 **HEARING OFFICER:** Can we take a quick break here?

13 **MS. POLVI:** Of course.

14 **HEARING OFFICER:** Let's go off the record for just a
15 minute.

16 **(A break was taken.)**

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

18 Q: With regard to Mr. Gardner, is there any
19 grounds for why he should have filed a
20 grievance against you that you're aware of?

21 A: Mr. Gardner?

22 Q: Correct.

23 A: I do not know of a reason why.

24 Q: Okay. I've asked you about each of the five
25 grievants. I just want to ask you about the



1 other six witness that appeared during the
2 Department of Education's case in chief was
3 Jeannie Ligon. Essentially Jeannie Ligon spoke
4 about one particular matter. And I don't want
5 to kind of paraphrase it all, but you were here
6 and you recall with regard to a particular
7 incident that she said I think she felt was
8 maybe ethically questionable. Do you recall
9 that?

10 A: I do.

11 Q: What was your response to that incident that
12 she alleged?

13 A: The words that have been used in the witness
14 statements is that I coerced her. I did not
15 ask her to do anything unethical. I did not
16 pressure her or coerce her. I looked at her at
17 the end and said, have we dotted all of our I's
18 and crossed our Ts. That would be something I
19 would normally say. And I think she responded
20 yes. And she said, do I need to get an
21 attorney? And I said no. I just want to make
22 sure that we are covered. Because he kind of
23 indicated or hinted that he may get legal help.
24 And I want to tell you, Jeannie Ligon is good.
25 She's probably the strongest employee that

