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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM THE ADMINISTRATIVE LAW COURT

S. Phillip Lenski, Administrative Law Judge

Case No. 2020-000950

Dr. Agnes SlaymanAppellant

v.

South Carolina Department of EducationRespondent.

RECORD ON APPEAL - VOLUME VIII

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EDUCATION SEPTEMBER 16, 2015

Chester superintendent returns; officials still quiet on reason for extended absence

Superintendent Agnes Slayman has not acknowledged Herald's questions

Chester County school district is under investigation by state education department

Details of Slayman's 'personal leave' undisclosed; board members have talked privately



Agnes Slayman

BY ANNA DOUGLAS
adouglas@heraldonline.com

CHESTER — Superintendent Agnes Slayman appeared to have returned to work at her Chester County School District office Wednesday, with district officials still not saying why she's been absent from work the past few weeks.

Slayman, too, has not answered The Herald's questions about her leave of absence this month. On Wednesday, the Chester school district's spokeswoman forwarded a reporter's questions to the superintendent. Slayman did not respond.

The day before Slayman's return to the district office, The Herald reported the Chester County School District is under a state Department of Education investigation for alleged grade



tampering. Chester County school board Chairwoman Denise Lawson said Tuesday any state probe comes months after the district's own internal investigation into the unspecified claims.

Lawson said she could not provide details about the issue, but she told The Herald that one employee involved no longer works in Chester County schools. She said district leaders looked into the issue last school year and handled it appropriately.

Slayman could not be reached for comment this week about the state investigation.

The S.C. Department of Education has not yet finished its inquiry into the claim of grade "adjustments" or tampering. Officials have not indicated that the current investigation is tied to Slayman's recent unexplained "personal leave."

Still, several questions posed to the Chester school board and the district office have gone unanswered this month including whether Slayman's recent absence was a choice or a request from supervisors, and whether the superintendent was paid while on leave.

This week, school board trustees spent more than two hours behind closed doors meeting with two attorneys to discuss Slayman's employment. Two weeks ago, board members met privately for three hours with an attorney but would not say whose employment they talked about.

On Monday, during a brief public portion of a school board meeting, board members voted 6-1 to hear an employee or employees' "grievance," but would not specify who the complaint or complaints were filed against.

Lawson has said the day-to-day business of the school district has gone on in Slayman's absence this month. She told The Herald on Tuesday the top priority of the district - to educate children - has not been affected by the board's deliberations or the superintendent's leave.

Chester County schools serve more than 5,200 students.

Slayman's leave of absence this month came at a time of contention and uncertainty in the district over who would provide security at home high school football games.

Relations apparently became strained between the school district and the Chester County Sheriff's Office this summer after district officials replaced deputies with private security guards on school grounds. District officials, the sheriff's office, the City Council and the County Council all were involved in discussions this summer over whether city police officers could have legal jurisdiction to work as security at Chester High School games, though the football stadium sits outside Chester city limits.

Normally, sheriff's deputies would be in uniform at home athletic events, but that arrangement seemed to be no longer a guarantee when the district swapped deputies for security guards as school security officers. Earlier this month, sheriff's office and district employees drew up an agreement to have deputies at games - at least for the short term.

Slayman, who soon will reach her four-year anniversary with the school district as superintendent, has not publicly commented on the football game security issue.

Before arriving in Chester in January 2012, Slayman worked in the Kershaw County school district. Her career in education spans nearly 30 years, including time spent as a teacher, principal and assistant superintendent.

The superintendent earns a \$150,000 salary, paid for by taxpayers in Chester County.

Anne Douglas: 803-329-4068, @ADouglasHerald

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COMMENTS

EDUCATION SEPTEMBER 16, 2015

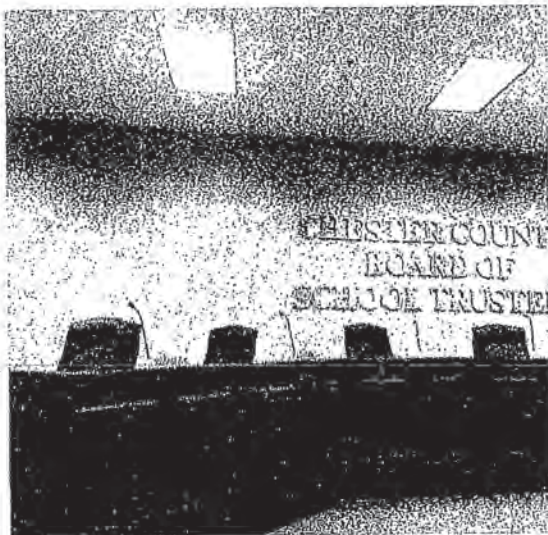
S.C. education agency investigates claim of grade tampering in Chester County

09/16/2015

Officials say previous local investigation, action took place

No indication the inquiry is tied to superintendent's "personal leave"

School board chairwoman says district has acted appropriately



BY ANNA DOUGLAS

adougla@heraldonline.com

CHESTER — South Carolina's public education oversight agency is investigating an allegation of "grade adjustments" or tampering within the Chester County School District, The Herald learned Tuesday.

Spokesman Dino Teppara confirmed the state Department of Education is "looking into" the claim. He said his office could not comment on details of the case, citing the ongoing investigation.

Denise Lawson, chairwoman of the Chester County school board, said she could not speak to the state's investigation. She did say the district took action during the past school year, in response to allegations against an employee.

"That employee is no longer working in the district," Lawson said, without identifying the employee or the substance of the allegations. "It was handled in an appropriate action."

At least one state legislator was contacted within the past year in reference to a concern about the Chester County school district, but he said he does not know any details about the investigation. Sen. Creighton Coleman, D-Winnsboro, whose district includes Chester County, said he advised that constituent to contact the school district and, if necessary, the Department of Education.

It was unclear Tuesday what led to the state investigation and whether any school district employees face further discipline in connection with the alleged grade tampering. It's also unclear when the investigation began and how long it could last.

The Department of Education has the authority to investigate claims regarding a range of school or district issues, including teacher conduct, accountability and standards, and administrative issues. In some cases, school districts are required by law to report instances of educator misconduct to the state.

Additionally, school districts have their own policies and procedures for investigations. Lawson said Chester County officials look into all claims and allegations.

"We take that serious; we don't brush that aside," she said, adding that the district appropriately investigated the allegations and took the correct responsive actions.

This month in Chester, other questions have loomed about Superintendent Agnes Slayman's unexplained, indefinite leave of absence from work. There has been no indication from state or district officials that Slayman's leave is connected to the current grade-tampering investigation.

Lawson and others have said they cannot offer details about Slayman's leave of absence or talk about recent private board discussions surrounding the superintendent's employment. District officials also have discussed this month behind closed doors at least one employee "grievance," but have not tied that matter to Slayman's absence.

Those discussions have taken place in executive session during two September board meetings. This week, two attorneys met with school board members in private to discuss Slayman's employment and the employee complaint.

Officials have repeatedly declined to say publicly why Slayman has been on leave, whether she's being paid, or when she may return.

At a board meeting Monday – apparently unrelated to the state investigation – school board members voted 6-1 to hear at least one employee grievance at a later date. Trustee Patricia Housley voted against hearing the complaint but did not specify why she was opposed.

Lawson stressed Tuesday that Slayman's absence has not affected the quality of education in Chester schools. Administrators and teachers, she said, are committed to the education, well-being and safety of Chester students.

"These kids deserve the best we can give them," she said.

School board members are limited in what information can be made public related to recent meetings, Lawson said, and she understands parent questions and concerns and wants them to continue to be involved in their children's education.

"We want them to care," she said.

Anita Douglas: 803-329-4068, @ADouglasHerald

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COMMENTS

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THE SCHOOL DISTRICT OF CHESTER COUNTY
509 DISTRICT OFFICE DRIVE
CHESTER, SOUTH CAROLINA 29706

October 1, 2014

Dr. Agnes Slayman, Superintendent
Chester County School District
509 District Office Drive
Chester, South Carolina 29706

Dear Dr. Slayman:

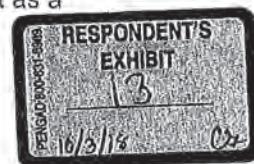
I am writing on behalf of the Chester County Board of School Trustees to provide a summary of your annual performance evaluation for the 2013-2014 school year.

All seven board members met in executive session on September 15, 2014, to review and discuss your performance and progress toward our mutually agreed upon critical areas and goals. The critical areas assessed with corresponding AdvancED goals were Board-Superintendent Relations, Instruction, Facilities, Technology, Human Resources, Operations, Budget, Recognitions, Community Relations/Professional Growth, and Community Connections.

The board unanimously commends your outstanding performance during the past school year and compliments you for your continued demonstrated energy and dedication to our students and your focus upon increasing academic achievement and the improvement of teaching and learning.

Your demonstration to a high standard of ethics, honesty, fairness and integrity has earned you the respect of this board, as well as your professional colleagues, school district employees, and members of the community. You have maintained a quality relationship with the board by keeping the board informed on issues, needs, and operations of the school system with immediate response and feedback to our questions and concerns – always making decisions with transparency. We have appreciated your professional advice to the board on items requiring board action with your appropriate recommendations being based upon thorough study and analysis. Your vision for the future of our district and cooperation with us has helped the board to develop attainable goals for the district's schools and programs including receiving AdvancED accreditation. You have truly rebuilt the trust, image and reputation of our entire school district in a very short period of time.

We are proud of your recognitions from the South Carolina Association of Career and Technology Educators and the South Carolina Association of School Resource Officers. While these are state accolades, you have brought national attention to our district as a



Dr. Agnes Slayman, Superintendent
October 1, 2014
Page 2

Duke Energy Power Partner (one of 18 in the nation), a Microsoft Alliance Partnership member (first in the southeast and one of 12 in the United States), a presenter at a Microsoft event in New York City, recognition as Bronze Medal Schools by the *U.S. News and World Report* to Great Falls High School and Lewisville High School, and an EnvisionSC partnership with countries around the globe.

Locally, you have spearheaded our first year implementation of hiTEC and the distribution and training for use of tablets by teachers and high school students along with a hiTEC celebration bringing together 200+ individuals, businesses and politicians. You have also served on numerous boards and developed partnerships with local universities. Your active participation in community life and affairs has helped to gain extra funding and visibility for our district.

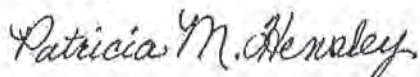
We especially commend your efforts toward improved employee morale, which has led to staff stabilization and an improvement in teacher retention, as well as a balanced budget with funds being spent wisely while maintaining adequate control and accounting procedures.

As you well know, one of our cooperatively developed improvement goals for 2014-2015 is to continue to focus on increasing academic achievement especially in the area of literacy. We will also study, review and support your efforts toward a salary study which will promote retention and provide competitive salaries for our employees and a facilities study to assist us in planning for future building and operational needs – both as two of our three goals.

In conclusion and based upon your outstanding evaluation, the board members voted unanimously to amend your contract to increase your annual annuity contribution by 2 percent; extend buyout on your contract to the fiscal year; extend your contract two years through June 30, 2019; increase your travel allowance to \$800.00 per month; increase vacation to 30 days with 45 days accrual; and increase your salary by 5 percent retroactive to July 1, 2014.

Should you wish to respond in writing to the results of this evaluation, you may do so. A copy of this letter along with any response will be placed with your contract.

Sincerely,



Patricia M. Hensley
Board Chair

PMH:cm

c: All Board Members

STATE OF SOUTH CAROLINA)
)
 COUNTY OF CHESTER)
)
) PROFESSIONAL EMPLOYMENT
) AGREEMENT BETWEEN THE
) BOARD OF TRUSTEES OF
) CHESTER COUNTY SCHOOL DISTRICT
) AND DR. AGNES SLAYMAN

This contract of employment is made and entered into this 1st day of December 2011, by and between the Chester County School District Board of Trustees (hereinafter referred to as either "the Board" or "the District") and Dr. Agnes Slayman (hereinafter referred to as "the Superintendent").

WHEREAS, the Board desires to provide the Superintendent with a written employment contract in order to enhance administrative stability and continuity within the schools, which the Board believes generally improves the quality of its overall educational program; and

WHEREAS, the Board and the Superintendent believe that a written contract is necessary to describe specifically their relationship and to serve as the basis for effective communication between them as they fulfill their respective duties and responsibilities in the operation of the schools of Chester County;

NOW, THEREFORE, the Board and the Superintendent, for the consideration herein specified, agree as follows:

1. TERM

The Board, in consideration of the promises herein contained of the Superintendent, hereby employs and the Superintendent hereby accepts employment as Superintendent of the District for a term commencing January 1, 2012, and ending June 30, 2015. Prior to January 1, 2012, Dr. Agnes Slayman shall be designated Superintendent-Elect by the Board and shall perform any and all duties in this position as may be deemed appropriate and agreed upon by the parties. The Superintendent-Elect shall be paid a per diem based upon her



contractual salary as provided herein and reimbursed for all reasonable expenses related to the performance of her duties as Superintendent-Elect.

2. CERTIFICATION AND RESPONSIBILITIES
OF THE SUPERINTENDENT

The Superintendent will furnish throughout the life of this contract a South Carolina School Superintendent's Professional Certificate issued by the South Carolina Department of Education.

The Superintendent shall have charge of the administration of the District under the direction of the Board. She shall be the chief executive officer for the Board; shall select, organize and assign all personnel, as best serves the District, subject to the approval of the Board; shall oversee the instructional program and business affairs of the District; shall from ~~time to time suggest regulations, rules, and procedures deemed necessary for the well ordering of~~ the District; and in general perform all duties incident to the office of Superintendent as prescribed by Board policy and such other duties as may be prescribed by the Board from time to time. The Superintendent shall have the right to attend all Board meetings and all Board and citizen committee meetings, serving as an ex officio member and providing administrative recommendations on each item of business considered, except as otherwise provided herein. The Board may only meet in executive session without the Superintendent or her representative for the purpose of discussing the Superintendent's evaluation, compensation, Board and Superintendent relations, and/or individual Board member actions or Board member relations with other Board members.

The Board, individually and collectively, shall promptly refer all substantive criticisms, complaints, and suggestions called to the Board's attention to the Superintendent for study and appropriate action, and the Superintendent shall investigate such matters, or cause such matters to be investigated, and when requested or is otherwise necessary, shall inform the Board

of the results of such investigations. Requests for substantive information shall be made to the Superintendent and not to individual members of the District staff.

The Superintendent agrees to devote her time, skill, labor, and attention to said employment during the term of this contract, provided, however, that the Superintendent may undertake various professional duties and obligations, including writing, lecturing, and speaking engagements. The Board should be provided with notice of any such commitments which may require or involve a significant time commitment.

The District encourages the continuing professional growth of the Superintendent through her participation, as she might decide in light of her responsibilities as Superintendent, in (a) the operations, programs, and other activities conducted or sponsored by local, state, and national school administrator and school board associations; (b) seminars and courses offered by public or private educational institutions; and (c) informational meetings with other persons whose particular skills or backgrounds would serve to improve the capacity of the Superintendent to perform his professional responsibilities for the District. In its encouragement, the District shall permit a reasonable amount of released time for the Superintendent to attend such matters and pay for the necessary fees for travel and subsistence expenses as provided by the District in the annual budget.

3. COMPENSATION

The Board shall pay the Superintendent an annual salary of One Hundred and Forty Thousand Dollars (\$140,000.00). The annual salary rate shall be paid to the Superintendent in accordance with the schedule of salary payments in effect for other certificated employees of the District. The Board and the Superintendent may mutually agree to adjust the salary and benefits (including severance pay) of the Superintendent during the term of this contract, based on satisfactory performance, but in no event shall the Superintendent be paid less than \$140,000. Any adjustments made during the life of this contract shall be in the form of an

amendment and become part and parcel of this contract, but it shall not be deemed that the District and the Superintendent have entered into a new contract or that the termination date of the existing contract has been extended. The Superintendent shall have the option of designating any part of her salary to be contributed directly by the District to an annuity plan of the Superintendent's choice.

4. BENEFITS

(a) The Superintendent shall be entitled to all benefits of administrative employees of the District, including but not limited to, leave, insurance protection, retirement programs, and choice of tax sheltered annuities.

(b) The Superintendent shall be entitled to a minimum of ten days of vacation, effective January 1, 2012, in addition to all legal and other holidays recognized by the District.

(c) The District will provide the Superintendent with a term life insurance policy, face value of One Hundred Thousand Dollars (\$100,000.00), with the beneficiaries to be designated by the Superintendent, so long as she is employed by the District.

(d) The Superintendent shall be provided with a cellular telephone and/or personal data assistant, a laptop computer, a home facsimile machine, and a telephone line at home to support the facsimile machine for use in the performance of her duties under this Agreement. The Superintendent may also utilize these resources for reasonable personal use.

(e) The District shall make an annual contribution to an annuity of the Superintendent's choosing in an amount equivalent to three percent (3%) of the Superintendent's contractual annual salary, all contributions to be conditioned upon a satisfactory evaluation as determined in good faith by the Board. The first contribution should be made on or before December 1, 2013, if earned.

(f) The District shall provide the Superintendent and her family with a comprehensive medical insurance program, under the South Carolina State Insurance Program, which coverage shall include dental and vision insurance.

5. EXPENSES

(a) The District shall pay the Superintendent's dues to the American Association of School Administrators, the South Carolina Association of School Administrators, and any other professional group membership which the Superintendent believes is necessary to maintain and improve her professional skills. The Board shall further pay or reimburse the Superintendent for reasonable expenses incurred by the Superintendent in the continuing performance of her duties under this employment contract, as provided in the District budget.

(b) Additionally, the District shall reimburse the Superintendent for all reasonable expenses, as determined by the Board in good faith, incurred in relocating the Superintendent and her family from their present residence in Kershaw to the District. The Superintendent agrees to establish a residence and locate her family within the District on or before January 1, 2013.

(c) Should the Superintendent seek and be granted a release from her employment prior to January 1, 2014, the Superintendent shall reimburse the District for all moving expenses advanced pursuant to this contract. Said provision shall not apply should the Superintendent seek release from the contract due to personal health problems. The Superintendent's obligation for reimbursement pursuant to this paragraph shall be limited to the actual dollar amount which she received from the District for moving expenses.

6. AUTOMOBILE ALLOWANCE

The Board shall provide the Superintendent with a monthly automobile allowance, to be determined annually, but not less than Five Hundred Dollars (\$500.00) monthly,

for reimbursement for any intra-District travel. Any professional travel outside the District shall be reimbursed pursuant to existing District policy.

7. PROFESSIONAL LIABILITY

The District agrees that it shall defend, hold harmless, and indemnify the Superintendent from any and all demands, claims, suits, actions, and legal proceedings brought against the Superintendent in her individual capacity or in her official capacity as an agent/employee of the District, provided the incident or occurrence giving rise to the claim or action took place while the Superintendent was acting within the scope of her employment and, provided the Superintendent and the District do not have adverse interests in the matter. In no case shall an individual Board member be considered personally liable for indemnifying the Superintendent against such demands, claims, suits, actions, and legal proceedings.

8. MEDICAL EXAMINATION

In light of the unique nature of the professional duties of the Superintendent, the District shall, at its expense, provide to the Superintendent a complete annual medical examination by a physician licensed to practice medicine in South Carolina. The Superintendent shall direct the physician to advise the Board, in writing, of the continued fitness of the Superintendent to perform her duties. The contents of the report shall be kept confidential.

The first such report shall be provided to the Board Chairman on or before March 1, 2012. The receipt of an acceptable report as provided herein shall be a condition precedent to the Superintendent's continued employment pursuant to this contract.

9. EVALUATION

The Board and Superintendent shall meet at least once annually and may include other appropriate school officials of the District for the purpose of establishing District goals and objectives for the ensuing school year. Said goals and objectives shall be reduced to writing and be among the criteria by which the Superintendent is evaluated as hereinafter provided. This

annual meeting shall normally be held during the summer with the initial such meeting conducted on or before July 1, 2012.

The Board shall evaluate the performance of the Superintendent at least once a year during the term of this agreement. For this purpose, the Superintendent shall submit to the Board a recommended format for conducting the evaluation. The Board shall meet and discuss the proposed format, attempting in good faith to reach consensus with the Superintendent as to a mutually agreeable evaluation format. Thereafter, the Board shall adopt an evaluation format and shall evaluate the Superintendent pursuant thereto.

To conclude the evaluation, the Board shall meet in executive session for the purpose of discussing the results of the evaluation and any related matters, such as the terms of the Superintendent's contract. The results of the evaluation and any conclusions drawn by the Board shall be shared with the Superintendent, both verbally, in executive session, and in the form of a written summary. The Superintendent shall have the right to respond to the results either during the executive session, or in writing, following the executive session. Any written response, along with the written summary of the results, shall be made a part of the Superintendent's personnel file. Following the Superintendent's evaluation or her written response, and at the request of either party, the Board may meet with the Superintendent in executive session to discuss the matter further.

The annual evaluation shall normally be conducted during the fall, with the first annual evaluation scheduled for the fall of 2012. The Board, however, reserves the right to conduct an interim evaluation of the Superintendent's performance after the first three months of the Superintendent's employment under this contract.

10. RENEWAL

If the District does not notify the Superintendent in writing, before December 1, 2014, that this employment contract will not be renewed, it shall be deemed that the District has

renewed this employment contract for one year, extending from the termination date set forth above; said practice shall remain in effect for each subsequent year of the contract. The Superintendent shall remind the Board in writing of the existence of this automatic renewal clause on or before September 1, 2014, and each year thereafter by September 1.

11. TERMINATION

This contract shall be terminated by:

- (a) mutual agreement of the parties;
- (b) disability of the Superintendent;

In the event of disability by illness or incapacity, the Board may terminate this contract by written notice to the Superintendent at any time after the Superintendent has exhausted any accumulated sick leave and such other leave as may be available, and has been absent from her employment, for whatever cause, for a continuous period of 90 days. Except for any notification which may be required by law, including but not limited to COBRA, all obligations of the District shall cease upon such termination.

If a question arises concerning the capacity of the Superintendent to return to her duties, the Board may require the Superintendent to submit to a medical examination, at District expense, to be performed by a certified physician of the Board's choice. The physician shall submit a report to the Board as to whether the Superintendent is fully capable of fully resuming her duties and responsibilities.

- (c) discharge for cause;

Discharge for cause shall constitute conduct which is prejudicial to the District, including but not limited to unprofessional conduct, neglect of duty, insubordination or incompetency. Notice of discharge for cause shall be given in writing and the Superintendent shall be entitled to appear before the Board, in executive session, to discuss such causes. If the Superintendent chooses to be accompanied by legal counsel at such meeting, she shall bear any

costs therein involved. Following the meeting, the Superintendent shall be provided notice, in writing, of the results of the meeting.

(d) unilateral termination of the Superintendent;

The Board may, at its option, unilaterally terminate this agreement upon an affirmative vote of a majority of the Board at any regular or special meeting of the Board. In the event of such termination, the Superintendent shall not be entitled to appear before the Board; however, the District shall pay to the Superintendent, upon the execution of a complete release satisfactory to the Board, severance pay the equivalent of six month's salary or the balance due on the contract, whichever is less. It is understood that this option should be exercised only after reasonable efforts pursuant to paragraph 11(a) of the contract has been concluded;

(e) death of the Superintendent.

12. ADMINISTRATIVE LEAVE

At any time during the term of this Agreement when the Board Chairman deems it in the best interest of the District, he/she may advise and then place the Superintendent on administrative leave with full pay and benefits. Such administrative leave shall continue until the Board as a whole meets and decides otherwise.

13. SAVINGS CLAUSE


If, during the term of this contract, it is found that a specific clause of the contract is illegal under either federal or state law, the remainder of the contract not affected by such ruling shall remain in force.

14. DECLARATION OF THE GOVERNOR

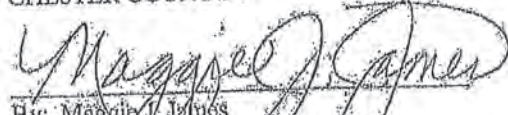
As required by S.C. Code Ann. § 59-18-1580, this contract shall be void should the Governor of South Carolina declare that the office of Superintendent in Chester County School District is vacant.

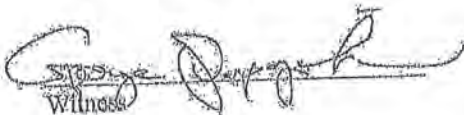
IN WITNESS WHEREOF, the Board has caused this employment contract to be approved in its behalf by its duly authorized Chairman and the Superintendent has approved this employment contract effective on the day and year specified above.

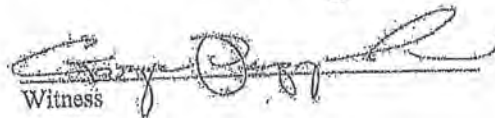
SUPERINTENDENT


Dr. Agnes Slayman
Superintendent

BOARD OF TRUSTEES
CHESTER COUNTY SCHOOL DISTRICT


By: Maggie J. James
As Its: Chairman


Witness


Witness

December, 15th, 2011

Chester, South Carolina

STATE OF SOUTH CAROLINA)	FIRST AMENDMENT TO THE
)	PROFESSIONAL EMPLOYMENT
COUNTY OF CHESTER)	AGREEMENT BETWEEN THE
)	BOARD OF TRUSTEES OF
)	CHESTER COUNTY SCHOOL DISTRICT
)	AND DR. AGNES SLAYMAN

The Board of Trustees of Chester County School District has entered into an employment contract with Dr. Agnes Slayman whereby the said Dr. Slayman was employed to serve the Chester County School District as Superintendent. The said contract of employment is still in effect. It now appears that the Board of Trustees and Dr. Slayman are desirous of amending the said contract in the following particulars:

(1) Paragraph 1 (Term) of the contract shall be amended so as to extend the term for two years or through June 30, 2017. Accordingly, paragraph 1, as amended, shall provide:

The Board, in consideration of the promises herein contained of the Superintendent, hereby employs and the Superintendent hereby accepts employment as Superintendent of the District for a term commencing January 1, 2012, and ending June 30, 2017.

(2) Paragraph 4 (Vacation) of the contract shall be amended to increase the Superintendent's vacation allowance by five days, or to fifteen days annually. Additionally, the Superintendent may accrue up to thirty days of earned but unused vacation. Accordingly, paragraph 4(b), as amended, shall provide:

The Superintendent shall be entitled to a minimum of fifteen days of vacation annually, in addition to all legal and other holidays recognized by the District. The Superintendent may accrue up to 30 earned but unused days of vacation, for which she will receive reimbursement at her daily rate of pay upon her separation from employment with the District.

(3) Paragraph 6 (Automobile Allowance) of the contract shall be amended to

increase the Superintendent's monthly automobile allowance by \$150 for in-District travel.

Accordingly, Paragraph 6, as amended, shall provide:

The Board shall provide the Superintendent with a monthly automobile allowance, to be determined annually, but not less than Six Hundred Fifty Dollars (\$650.00) monthly, for reimbursement for any intra-District travel. Any professional travel outside the District shall be reimbursed pursuant to existing District policy.

(4) Paragraph 10 (Renewal) of the contract shall be amended so as to reflect the new renewal date based upon the two-year extension granted by the Board. Accordingly, paragraph 10, as amended, shall provide:

If the District does not notify the Superintendent in writing, before December 1, 2016, that this employment contract will not be renewed, it shall be deemed that the District has renewed this employment contract for one year, extending from the termination date set forth above; said practice shall remain in effect for each subsequent year of the contract. The Superintendent shall remind the Board in writing of the existence of this automatic renewal clause on or before September 1, 2016, and each year thereafter by September 1.

IN WITNESS WHEREOF, the Board has caused this First Amendment to the employment contract to be approved on its behalf by its duly authorized Chairman and the Superintendent has approved this employment contract effective on the day and year specified below.

SUPERINTENDENT



Dr. Agnes Slayman
Superintendent

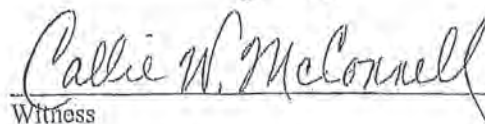


Witness

BOARD OF TRUSTEES
CHESTER COUNTY SCHOOL DISTRICT



By: Maggie J. James
As Its: Chairman



Witness

October, 15, 2012

Chester, South Carolina

STATE OF SOUTH CAROLINA)	SECOND AMENDMENT TO THE
)	PROFESSIONAL EMPLOYMENT
)	AGREEMENT BETWEEN THE
COUNTY OF CHESTER)	BOARD OF TRUSTEES OF
)	CHESTER COUNTY SCHOOL DISTRICT
)	AND DR. AGNES SLAYMAN

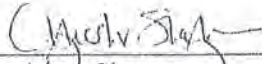
The Board of Trustees of Chester County School District has entered into an employment contract with Dr. Agnes Slayman whereby the said Dr. Slayman was employed to serve the Chester County School District as Superintendent. The said contract of employment is still in effect. It now appears that the Board of Trustees and Dr. Slayman are desirous of amending the said contract in the following particulars:

(1) Paragraph 3 (Compensation) of the contract shall be amended so as to reflect the salary increase of 1½% granted by the Board, effective July 1, 2013. Accordingly, paragraph 3, as amended, shall provide:


The Board shall pay the Superintendent an annual salary of One Hundred Forty-Four Thousand Nine Hundred Forty-Two Dollars (\$144,942.00). The annual salary rate shall be paid to the Superintendent in accordance with the schedule of salary payments in effect for other certificated employees of the District. The Board and the Superintendent may mutually agree to adjust the salary and benefits (including severance pay) of the Superintendent during the term of this contract, based on satisfactory performance, but in no event shall the Superintendent be paid less than \$144,942.00. Any adjustments made during the life of this contract shall be in the form of an amendment and become part and parcel of this contract, but it shall not be deemed that the District and the Superintendent have entered into a new contract or that the termination date of the existing contract has been extended. The Superintendent shall have the option of designating any part of her salary to be contributed directly by the District to an annuity plan of the Superintendent's choice.

IN WITNESS WHEREOF, the Board has caused this Second Amendment to the employment contract to be approved on its behalf by its duly authorized Chairman and the Superintendent has approved this employment contract effective on the day and year specified below.

SUPERINTENDENT

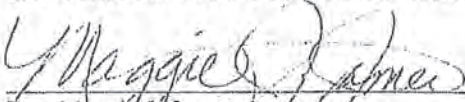


Dr. Agnes Slayman
Superintendent

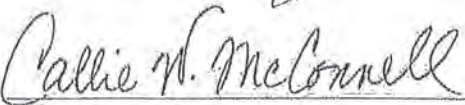


Witness

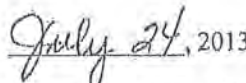
BOARD OF TRUSTEES
CHESTER COUNTY SCHOOL DISTRICT



By: Maggie James
As Its: Chairman



Witness



Chester, South Carolina

STATE OF SOUTH CAROLINA

COUNTY OF CHESTER

) THIRD AMENDMENT TO THE
) PROFESSIONAL EMPLOYMENT
) AGREEMENT BETWEEN THE
) BOARD OF TRUSTEES OF
) CHESTER COUNTY SCHOOL DISTRICT
) AND DR. AGNES SLAYMAN

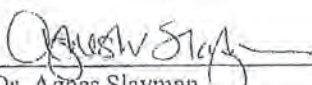
The Board of Trustees of Chester County School District has entered into an employment contract with Dr. Agnes Slayman whereby the said Dr. Slayman was employed to serve the Chester County School District as Superintendent. The said contract of employment is still in effect. It now appears that the Board of Trustees and Dr. Slayman are desirous of amending the said contract in the following particulars:

(1) Paragraph 4(e) (Benefits) of the contract shall be amended so as to increase the District's annual annuity contribution by two percent, or to five percent of the Superintendent's total salary, contingent upon a satisfactory evaluation. Accordingly, paragraph 4, as amended, shall provide:

(e) The District shall make an annual contribution to an annuity of the Superintendent's choosing in an amount equivalent to five percent (5%) of the Superintendent's contractual annual salary, all contributions to be conditioned upon a satisfactory evaluation as determined in good faith by the Board. The contribution should be made on or before December 1 of each year, if earned.

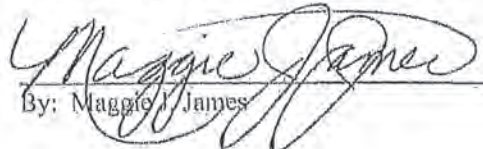
IN WITNESS WHEREOF, the Board has caused this Third Amendment to the employment contract to be approved on its behalf by its duly authorized Chairman and the Superintendent has approved this employment contract effective on the day and year specified below.

SUPERINTENDENT



Dr. Agnes Slayman

BOARD OF TRUSTEES
CHESTER COUNTY SCHOOL DISTRICT



By: Maggie James

STATE OF SOUTH CAROLINA)	FOURTH AMENDMENT TO THE
)	PROFESSIONAL EMPLOYMENT
)	AGREEMENT BETWEEN THE
COUNTY OF CHESTER)	BOARD OF TRUSTEES OF
)	CHESTER COUNTY SCHOOL DISTRICT
)	AND DR. AGNES SLAYMAN

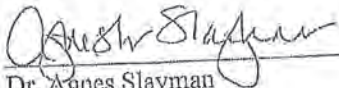
The Board of Trustees of Chester County School District has entered into an employment contract with Dr. Agnes Slayman whereby the said Dr. Slayman was employed to serve the Chester County School District as Superintendent. The said contract of employment is still in effect. It now appears that the Board of Trustees and Dr. Slayman are desirous of amending the said contract in the following particulars:

(1) Paragraph 11(d) (Unilateral Termination of the Superintendent) of the contract shall be amended so as to require a vote of a super majority of the Board to reach a decision on unilateral termination. Accordingly, paragraph 11(d), as amended, shall provide:

(d) The Board may, at its option, unilaterally terminate this agreement upon an affirmative vote of five members of the Board at any regular or special meeting of the Board. In the event of such termination, the Superintendent shall not be entitled to appear before the Board; however, the District shall pay to the Superintendent, upon the execution of a complete release satisfactory to the Board, severance pay the equivalent of six month's salary or the balance due on the contract, whichever is less. It is understood that this option should be exercised only after reasonable efforts pursuant to paragraph 11(a) of the contract has been concluded

IN WITNESS WHEREOF, the Board has caused this Fourth Amendment to the employment contract to be approved on its behalf by its duly authorized Chairman and the Superintendent has approved this employment contract effective on the day and year specified below.

SUPERINTENDENT

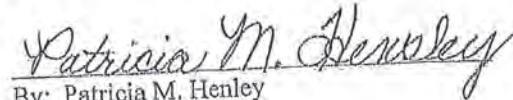

Dr. Agnes Slayman
Superintendent

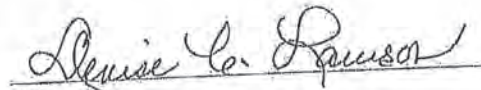

Witness

Feb. 27, 2014

Chester, South Carolina

BOARD OF TRUSTEES
CHESTER COUNTY SCHOOL DISTRICT


By: Patricia M. Henley
As Its: Chair


Witness

STATE OF SOUTH CAROLINA)	FIFTH AMENDMENT TO THE
)	PROFESSIONAL EMPLOYMENT
)	AGREEMENT BETWEEN THE
COUNTY OF CHESTER)	BOARD OF TRUSTEES OF
)	CHESTER COUNTY SCHOOL DISTRICT
)	AND DR. AGNES SLAYMAN

The Board of Trustees of Chester County School District has entered into an employment contract with Dr. Agnes Slayman whereby the said Dr. Slayman was employed to serve the Chester County School District as Superintendent. The said contract of employment is still in effect. It now appears that the Board of Trustees and Dr. Slayman are desirous of amending the said contract in the following particulars:

(1) Paragraph 1 (Term) of the contract shall be amended so as to extend the term for two years or through June 30, 2019. Accordingly, paragraph 1, as amended, shall provide:

The Board, in consideration of the promises herein contained of the Superintendent, hereby employs and the Superintendent hereby accepts employment as Superintendent of the District for a term commencing January 1, 2012, and ending June 30, 2019.

(2) Paragraph 3 (Compensation) of the contract shall be amended so as to increase the Superintendent's salary by 5%, effective July 1, 2014. Accordingly, paragraph 3, as amended, shall provide:

The Board shall pay the Superintendent an annual salary of One Hundred Fifty-Two Thousand One Hundred Eighty-Nine Dollars (\$152,189.00). The annual salary rate shall be paid to the Superintendent in accordance with the schedule of salary payments in effect for other certificated employees of the District. The Board and the Superintendent may mutually agree to adjust the salary and benefits (including severance pay) of the Superintendent during the term of this contract, based on satisfactory performance, but in no event shall the Superintendent be paid less than \$152,189.00. Any adjustments made during the life of this contract shall be in the form of an

amendment and become part and parcel of this contract, but it shall not be deemed that the District and the Superintendent have entered into a new contract or that the termination date of the existing contract has been extended. The Superintendent shall have the option of designating any part of her salary to be contributed directly by the District to an annuity plan of the Superintendent's choice.

(3) Paragraph 4(b) (Vacation) of the contract shall be amended to provide that the Superintendent may accrue up to forty-five days of earned but unused vacation.

Accordingly, paragraph 4(b), as amended, shall provide:

(b) The Superintendent shall be entitled to a minimum of thirty days of vacation annually, in addition to all legal and other holidays recognized by the District. The Superintendent may accrue up to 45 earned but unused days of vacation, for which she will receive reimbursement at her daily rate of pay upon her separation from employment with the District.

(4) Paragraph 4(e) (Benefits) of the contract shall be amended so as to increase the District's annual annuity contribution by two percent, or to seven percent of the Superintendent's total salary, contingent upon a satisfactory evaluation. Accordingly, paragraph 4, as amended, shall provide:

(e) The District shall make an annual contribution to an annuity of the Superintendent's choosing in an amount equivalent to seven percent (7%) of the Superintendent's contractual annual salary, all contributions to be conditioned upon a satisfactory evaluation as determined in good faith by the Board. The contribution should be made on or before December 1 of each year, if earned.

(5) Paragraph 6 (Automobile Allowance) of the contract shall be amended so as to increase the amount of the monthly automobile allowance. Accordingly, paragraph 6, as amended, shall provide:

The Board shall provide the Superintendent with a monthly automobile allowance, to be determined annually, but not less than Eight Hundred Dollars (\$800.00) monthly, for reimbursement for any intra-District travel. Any

professional travel outside the District shall be reimbursed pursuant to existing District policy.

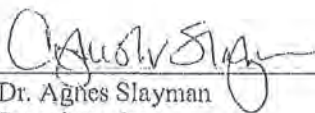
(5) Paragraph 11(d) (Unilateral Termination of the Superintendent) of the contract shall be amended so as to require a vote of a super majority of the Board to reach a decision on unilateral termination. Accordingly, paragraph 11(d), as amended, shall provide:

(d) The Board may, at its option, unilaterally terminate this agreement upon an affirmative vote of five members of the Board at any regular or special meeting of the Board. In the event of such termination, the Superintendent shall not be entitled to appear before the Board; however, the District shall pay to the Superintendent, upon the execution of a complete release satisfactory to the Board, severance pay the equivalent of twelve month's salary. It is understood that this option should be exercised only after reasonable efforts pursuant to paragraph 11(a) of the contract has been concluded.

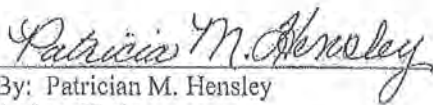
IN WITNESS WHEREOF, the Board has caused this Fifth Amendment to the employment contract to be approved on its behalf by its duly authorized Chairman and the Superintendent has approved this employment contract effective on the day and year specified below.

SUPERINTENDENT

BOARD OF TRUSTEES
CHESTER COUNTY SCHOOL DISTRICT



Dr. Agnes Slayman
Superintendent



By: Patricia M. Hensley
As Its: Chair



Witness



Witness

September 22, 2014

Chester, South Carolina

www.onlinechester.com

The NEWS REPORTER

EXPANDED: Emails allude to issues cited in Bagley report

By Travis Jenkins

Tuesday, November 17, 2015 at 10:08 pm (Updated: November 17, 11:56 pm)

Some of the issues that hastened Dr. Agnes Slayman's exit from the Chester County School district are alluded to in emails sent and received from her work account, but none conclusively prove the allegations that she fostered a hostile work environment.

In late August, not long after the start of the school year, Slayman went on leave without an explanation. It was later revealed that School Board Chair Denise Lawson had requested she do so while an investigation was ongoing. Betty Bagley, a 46-year educator and herself a former superintendent, came to Chester to interview staff members about Slayman's behavior and management style. The resulting report helped lead to Slayman's resignation (she was paid \$300,000 to leave while remaining as a consultant if needed for Interim Superintendent Keith Callicutt). The report was eventually made public and painted an ugly picture.

The report deemed Slayman's behavior as "spiteful, vengeful, mean, cruel, vicious, bullying, insensitive, paranoid, moody, divisive and hostile" and that it had become worse in the last two years of her three-year tenure. The report indicates that Slayman discouraged and frowned on absences, even those related to bereavement or family illness, and reacted coldly to the death of family members of employees. When one employee's brother passed away, she allegedly asked if he really needed more than one day off for bereavement. She discouraged the same employee from using leave to attend the funeral of a nephew because "things are busy." Staff "has to beg for time off, even for professional meetings" and wait "until she is in a good mood to ask for leave." Staff members indicated they are told to stay close to their phones and that "it is almost not worth asking off." She was said to have berated an employee for taking a vacation in July when an issue arose in August and allegedly would not speak to employees who asked for time off. She was said to expect a call back to her within five minutes whenever she called, 24 hours a day, seven days a week, regardless of circumstances. Those looking at jobs outside the district were said to be disloyal and Slayman was heard to give poor references to hamper the ability of employees to obtain employment elsewhere and to insult employees behind their backs to other employees. Slayman is alleged to have made inappropriate racial statements, including having said of a trip earlier this year to speak at a national education conference in Idaho that "Idaho is 95 percent white and as a result is 'heaven.'" An employee wondered whether not getting a promised raise had a racial component, given that Idaho comment. She is alleged to have gotten angry that a black security officer was assigned to Lewisville Elementary School and told a school administrator "He is black, fix it." Another level of that Idaho trip was Slayman supposedly telling staff members not to tell other board members that the board chair went on the trip, because they had also wanted to go. Beyond that, the report details that Slayman made statements that ranged from demeaning to threatening. She reportedly called employees "stupid" on numerous occasions, pointed at senior staff members standing in a row and asked if they had shared information with people, told an employee who had to make special child care



arrangements to attend a meeting "I don't need you here" when she arrived and frequently berated employees. She apparently veered into darker language at times, telling employees "I will cut your throat out if you ever speak to the board again," "take this to the grave or I'll kill you," "I will crucify you" and "I will cut your knees out from under you." She apparently told principals she would kill them during a security meeting and said of a non-employee "He doesn't know who he is dealing with, I'll cut his throat out." Some of her harshest language was directed at School Board Member Dr. Richard Hughes, about whom she said "That SOB, I am going to kill that Rick Hughes" and "that SOB better not have made a deal with the other board members." Slayman was also portrayed as being controlling, telling staff members to "unfriend" certain people on social media because "the board would be upset." She told senior staff not to speak to the school board or make eye contact with them and not to make facial expressions during board meetings. There was a list of people and groups with whom staff were instructed not to speak including Chester County Supervisor Shane Stuart, Chester County Sheriff Alex Underwood, the telephone company, the YMCA, The United Way, The Hazel Pittman Center, Boy Scouts or Girl Scouts and various media outlets, including the Chester News and Reporter. In regards to Underwood, she allegedly directed employees to interview students in an effort to "get" Underwood and have a coach fired, saying "I will get that guy this time, he is screwed." No context of any kind was provided in the report. It did appear that Slayman had an interest in what the sheriff was up to, or that those around her thought she did. Multiple articles written about the sheriff were forwarded to Slayman. A Charlotte TV station did a piece on Underwood and his wife, dubbing them "Chester County's very own power couple." A link to that story was sent to Slayman, though she had no comment. When the Sheriff's Office and the City of Chester Police had conflict over office space during the summer, prompting the city to move all its offices out of the law-enforcement complex and into City Hall, she was sent a news story on the event. She simply responded with "Wow!"

The Bagley report stated that Slayman often sent "terse" emails to employees, which was part of the overall atmosphere of hostility. As alluded to in the report, it does appear that Slayman frequently emailed employees very early in the morning and well past regular work hours. And while "terse" is subjective, there did not appear to be many, if any, emails of that nature among the approximately 4,000 pages the News & Reporter reviewed. There was one, to an unknown person about a topic that was not expounded upon, which was critical of an employee. "I am very concerned about this. She circumvented you and the principal, even with the issues we had last year, remember. She knew better. Please look into this and advise me," she wrote. In another email, while on her trip to Idaho, a principal emailed asking for a "quick breather" before the school year started. The principal wanted two days off, saying he had spent the summer interviewing potential new teachers, and said he was glad to know Slayman was enjoying some off-time herself. She wrote back that she was not off, she was speaking at a conference and that while she wouldn't deny the principal the requested time off, she was concerned that the only two openings remaining in the district were in that school and that the jobs didn't open up during the summer, they'd been open since the previous school year ended. She told the principal it was a big year for that particular school on many fronts, including public perception. The allegations that Slayman denied people time off or was cold and indifferent toward the health of the family members of employees are not supported by her emails. That doesn't mean such feelings weren't conveyed in person, on phone calls or on emails from a personal account (which she did have, as evidenced by the fact that she would occasionally email items or reminders to herself from one to the other), but there were dozens

of requests for time off for illnesses of family members. In each case, Slayman granted those requests, told those offering to work from home to just take care of their ill loved one and sent well-wishes. She often sent short messages like "Outstanding" or "Good work" when receiving news of some type of achievement or success. There was no racial language in any of her emails, though the Idaho trip which allegedly sparked some type of racial comment is discussed at great length. Hundreds of pages of emails dealt with her trip to speak in front of other educators. Many dealt with the logistics of the trip, the technical end of her presentations and in fine-tuning the address she would make. At one point, Slayman did seem to get a little perturbed over some back-and-forth over the availability of Internet service or Wi-Fi for her presentation. She was finally told a line could be secured for \$100.

"\$100 is nothing compared to bad Internet...Good Lord," she answered.

The Bagley report mentions that Slayman did not want district employees telling board members that Lawson was attending. An email from an organizer of the event does confirm that Slayman and Lawson both had rooms reserved, but no emails mention the need to keep quiet about it to anyone. There did seem to be some type of misunderstanding, however. "I just wanted to confirm that I double-checked your reservation and you do not have two reservations under your name. One executive suite is for you and one executive suite is for Denise Lawson," Sally Bouvia emailed from Idaho.

Slayman was apparently a fan of Idaho, for whatever reason.

"I came home bragging about your state to my colleagues, staff and my husband. My husband and I are actually going to take some time off later this year just to go back to Idaho and visit," she wrote to one of the event organizers.

Her address was apparently well-received.

"Buzz is still going from your keynote. You made a great impact as a leading-edge superintendent...we sure are big fans of Chester County School District," Bouvia wrote.

The Bagley report mentions some type of "breakfast cabinet," a group of unnamed men with whom Slayman ate breakfast each morning at the Country Omelet in Richburg. The report says she often worried about how they would feel about her decisions on issues and that she didn't want to upset the group or go against their wishes. Slayman said no district business was discussed at the meetings. There is one reference to her eating at the Country Omelet, as she emailed Lawson on July 29 and asked her to meet her there. "Is there any way that you could meet me in the morning on your way to work at the Country Omelet to sign the TAN that was talked about in June?" Slayman emailed.

The emails indicate that Slayman was already planning for the future. On July 30, she engaged in an email conversation about the possibility of the district going to a four-day instructional week.

"I am game for doing this next year...Denise is on board, wants me to survey teachers," she wrote.

Slayman was pleased with the results of the South Carolina High School League's realignment plan as well, which will kick in next year.

"Based on the realignments, I am looking for some region championships this year, maybe a few state championships," she wrote to district athletic directors.

There were a number of emails about development of a facilities plan, including the selection of an architectural firm. She was intrigued; apparently, by an article she was forwarded about building construction in another county.

"Take a look at the costs for the career center and an elementary school (in Cherokee, which cost \$20 million and \$17 million respectively). I need you to reach out to their person and find

out how they are building that career center so cheaply," she wrote to Jeff Gardner, the district's associate superintendent for operations. Many of the other allegations, including that Slayman tried to damage the opportunity for people in the district to receive employment elsewhere, are not touched on or indicated in the emails reviewed. Some of the entities whom Slayman allegedly told district staff not to speak with did converse with Slayman via email, but there is no indication in the emails of her having a problem with any of them.

www.onlinechester.com

The NEWS & REPORTER

EXPANDED: Slayman's emails give insight into security issue

By Travis Jenkins

Tuesday, November 17, 2015 at 10:05 pm (Updated: November 17, 11:56 pm)

Former Chester County Schools Superintendent Dr. Agnes Slayman went to great lengths to convince the public and district employees that a plan to drop Chester County Sheriff's Office-provided school resource officers for a private security firm would not have a negative impact on school safety.

The News & Reporter obtained and reviewed more than 4,000 pages of Slayman's work emails through a Freedom of Information Act request. The emails cover much of her final six months on the job. Slayman came to the district in 2012. Her tenure included a number of successes, including increased test scores and international recognition for embracing technology. Earlier this year she was one of only a handful of state school superintendents to be invited to the White House for a meeting with President Barack Obama. However, all the outward success masked internal problems, according to the so-called "Bagley Report" which was compiled just prior to her resignation in late September and released publicly in October. The report was based on interviews conducted by Betty Bagley, a 46-year educator who has worked as a superintendent in both Bamberg and Anderson Counties. The interviews took place from Aug. 31 through Sept. 3, when Slayman was on personal leave at the request of the board. It is noted that the people interviewed did so "with the belief that their jobs could be in jeopardy and that there were no personal gains (promotions or money) from sharing their experiences. They responded to direct questions and shared personal accounts of events they personally witnessed involving Slayman. The report detailed how Slayman allegedly created a hostile work environment, would do professional hatchet-jobs on those who sought to leave the district for work elsewhere, often said she'd "kill" or "crucify" people and made racist statements (see related story). Slayman, through an attorney, denied most all of the allegations, but did meet with Bagley and admitted to having said she'd kill someone "on maybe two occasions." Much of the report dealt with the move away from SROs to private security officers provided by Defender Services. Chester County Sheriff Alex Underwood criticized that move as "reckless" and "stupid," and said it would endanger the safety of students and that he would consider withdrawing his own child from the district as a result. Defender Services was contracted to put an armed guard in all nine schools, where there had been only four SROs to spread among those campuses before. The South Carolina Sheriff's Association sought an opinion on the matter from Attorney General Alan Wilson, who said private security guards were not legally empowered to make arrests on public property and that schools were public property. That led Slayman to approach the City of Chester. She addressed the council, asking that they request a jurisdictional extension from the county. Off duty officers were already providing security at extracurricular events (though they could not make arrests or detain anyone and Underwood sent all involved parties a letter stating he would not give them that authority), but if granted an extension, Chester High School, Chester Park and Chester Middle would have all been in the city's jurisdiction. That would empower

officers to detain people and make arrests at games but it would also allow city police to respond to those three schools in emergency situations, which Slayman requested. It would also have cut Underwood out of the process entirely, since Chester County Council could grant that extension. Chester County Council considered the idea, but there were legal questions about the contract the city (which approved the idea) presented. Legal advice was received on the request but no vote was ever taken by the council. Representatives from city and county government have both confirmed recently that the issue is now "dead." The report says Slayman interviewed "the ultimately successful security chief" (former Chester Police Chief Andre' Williams) prior to actual interviews and told him he had the job outside the normal interviewing process. The position was advertised publicly in the News & Reporter with a pay rate of \$38,000 a year, but the report says Slayman made staff "gross up" the pay to \$62,000 a year. The district has confirmed that Williams makes \$61,200 a year, plus benefits. However, Williams does perform additional duties, including many on off-hours to earn extra pay. Thirteen days before the Chester County School Board voted to allow Slayman to place more security in schools, on April 8, she received an email noting that a school district in Anderson County makes use of private security. Jeff Gardner, the district's associate superintendent for operations, forwarded her an email from an unnamed person in Anderson District Five. "We do use a private security firm for security officers in the elementary schools. Just in passing, I have heard things from some of the elementary principals. The company we use is Defender Services. We pay the company \$25 an hour," the email said. Interestingly, in May, after Chester schools had a deal in place with Defender Services, a security officer had his weapon taken away from him by a student in Anderson Five, which caused a brief firestorm in Chester among those already unhappy that SROs would no longer be present in schools. Ten days before the meeting where Slayman would be empowered to seek additional security for schools, she was forwarded an email from her secretary, Callie McConnell, from Sgt. Dwayne Robinson of the Chester County Sheriff's Office, indicating that Underwood knew the issue was forthcoming and wanted to talk about it. "The sheriff (Alex Underwood) has requested to be placed on 'The Agenda' not 'Public Comment' for the next school board meeting," the email says. "Thanks for your reply, but persons who are not affiliated with the district can only address the board when it is time for public comment. If a person wishes to address the board during public comment that individual has to follow the guidelines as indicated," McConnell responded to Robinson. Slayman made School Board Chair Denise Lawson aware of the issue. "Take a look at this," Slayman wrote, forwarding Lawson the related emails. "We are holding to our guidelines." McConnell received another email. She told Slayman she'd not read it, but the subject line said "Will we be on the 'Agenda?'" School Board Member Dr. Richard Hughes would ultimately recuse himself from the vote because he is a contracted employee of the county and the Sheriff's Office. There was some back-and-forth in the crafting of his statement on the issue. A deal with Defender Services apparently came together very quickly. On April 17, Slayman was emailed a proposal by a representative of the company named Aaron Crowe. "Having carefully examined the specifications, the general provisions, the indemnity and minimum insurance specifications, as well as the premises and conditions affecting the work, the undersigned hereby proposes and furnishes all labor and supervision to perform the work as covered by the specifications outlined and attached for the following sum," Crowe wrote. The proposal was for a cost of \$7,261.95 a week and \$261,426.60 annually, for nine security officers and one manager/captain. It is unknown if bids were sought from any other security provider, but none are indicated in Slayman's emails. "It looks fine. We need to ensure the

hours for the officers are noted somewhere in the document as 7:30-3:30 for 36 weeks," Slayman replied. She said School Board Member Dr. Laurens Fort had questions about the type of guns the guards would carry and wondered if the officers would have been trained in "Shoot/Don't Shoot." Although the use of SROs would soon end, an email on April 20 notes that the district paid the registration fee for all four SROs and Robinson for a DARE conference and paid for hotel rooms for them as well. After the board vote on April 21, Slayman became inundated with emails from various media outlets. Most were asking Slayman to comment on rumors they'd heard about SROs being dropped. Slayman either did not respond to those emails or dealt with them over the phone or in person. McConnell emailed Slayman on April 24. "Mrs. (Brenda) Fort (Great Falls High School principal) said she has been getting calls from people of Great Falls concerning the school security. She wants to talk to you about the calls," McConnell wrote. Emails from newspapers and TV stations continued for both Slayman and District Public Information Officer Brooke Clinton seeking comments. In one email, it is noted that Slayman had met with principals on at least two occasions to discuss the security issue and had actually given them talking points to use with the public. One principal emailed her that "most people's main concerns" are "are these individuals from the area and are they qualified? I don't believe they care if they work for the sheriff or not." The principal noted that there will now be an armed security officer in every building, not four SROs to spread out among four buildings as before and that the district has successfully farmed out services before, like hiring the Budd Group to handle custodial services. Another principal said the move to get an armed officer in every building showed the commitment the district had to protecting children and providing a safe environment. Another principal email, which was actually sent to a person not employed by the district who'd made a public comment on the situation, said the majority of district personnel were supportive of the move. That may have been the case, but some in the community did not share that view. A parent of children attending Chester County Schools (whose name, like many in the emails, was redacted) sent Slayman a lengthy email critical of the switch away from SROs. "I was very disappointed that you did not bring this issue to the parents of the children you serve. As a mother, not having a chance to give my opinion when you made a decision as important as this regarding the safety of my children is unacceptable," she wrote. Further, the mother, who said her husband works in law enforcement, questioned Slayman's characterization of the officers as "highly trained SLED officers." "Are you aware that SLED certified guards at most only need eight hours of training to receive the highest certification that is available?" she asked, in comparing that training to the minimum 12 weeks training SROs receive. She said she was not comfortable having a person with so little training carrying a gun on school premises or having them responsible for protecting kids. Slayman, Clinton and principals sent emails back-and-forth to craft what would serve both as a press release and a letter to parents about the issue. It went through some tweaks and principals were encouraged to personalize it in some way before sending it home to parents. On April 28, Clinton was dealing with a family illness and emailed Slayman that she could work from home. Slayman told her not to worry about it, to take care of her sick family member. "I don't think the media will bother you as I see it is no longer a top story," Slayman wrote. Another parent emailed Slayman, though, making reference to the riots occurring at the time in Baltimore. "It brings into focus the fact that we need local law enforcement for our protection and certainly our children need immediate aid should it be needed and that is not going to come from Columbia, S.C.," the parent wrote. One email said the sheriff was using the issue for purposes beyond only protecting children, though it is

difficult to tell if Slayman wrote it or if it was forwarded to her, or who it was sent to because so many names are redacted. "While the sheriff discounts these security guards, it should denoted that the guards will be retired military and law enforcement officers in good physical shape. They aren't newbies with only eight hours training (as stated by one county deputy). So the sheriff's effort to excite the public by lessening the security guards' abilities is without merit and biased," the email says. It further states that the sheriff needs to focus on protecting the whole county, and that "people are freaking out because the sheriff has created a frenzy in an attempt to protect his budget, personnel and the children...not just the children." When Defender Services was first introduced, Slayman said the security officers would have DARE training. It was revealed later that only law enforcement officers could receive DARE certification. Slayman emailed a Defender representative about the issue and was told they were inquiring about their officers receiving that training as well. "Please let me know when you get an answer, yes or no—this is a huge item to be addressed," Slayman wrote. "Agnes, we are waiting on a response from the federal program and also the state...worst case we could develop a comparable program and not call it DARE," Crowe responded. The issue carried well into the start of the new school year. A Charlotte TV station emailed asking Slayman to do a phone interview on an early newscast to discuss the first day of school in August. She forwarded the request to Clinton and asked her to advise. "This what you did last year. Depends on what you want to do. Can't promise they won't at least ask about security," Clinton said. On Aug. 4, Associate Superintendent for Curriculum Dr. Charles King emailed Slayman about the state Attorney General's office issuing its opinion that private security guards can't make arrests on public property. "(Redacted) has briefed me a little on the most recent goings on re: security," King wrote, punctuating it with a frowning emoji. There was apparently an issue with some schools not being fully staffed security-wise. "Please keep me posted on the progress of the security guards," Slayman wrote to King, Gardner and Clinton on Aug. 5. "If we are not fully staffed, how will you handle this Friday's event? (which may have been the Chester County Football Jamboree, scheduled for the next Friday). You folks need to talk in the morning. I will have two hours mid-morning." The issue was apparently quickly resolved, per a response from Gardner. Defender services and the security issue in general were rarely mentioned in the emails in her final few weeks working for the district.

2014-2015

Rob and Agnes Slayman

From: Agnes Slayman
Sent: Friday, October 17, 2014 8:08 AM
To: Brooke Clinton; Shawn Williams; Anna Stroud; Jeff Gardner; Charles W. King
Subject: Bosses Day

Thank you all very much for the gift card. I greatly appreciate your thoughtfulness and support. It is a pleasure to work with you! We make a great team!

Dr. Agnes M. Slayman
Superintendent
Chester County School District
509 District Office Drive
Chester, SC 29706
(803) 581-9502



Give it up
Senior Canada's!
😊
Senior & Hope

Thank you
for all you
do.
Charles

We couldn't miss
this chance to wish
a best at nice at you...

Thanks for all you do!

Enjoy your days!
Ed & Shawn

Have a great
day!
Love
Anne

... good luck, success,
and happiness
in everything you do.

Have a Wonderful
Boss's Day

Senior Cabinet

2016 Application

South Carolina Superintendent of the Year Program

South Carolina Association of School Administrators
121 Westpark Blvd. Columbia, SC 29210

Please complete the entire application, including your answers to the following questions. Email the application and four letters of support to April Griffin via email at april@scasa.org on or before April 10, 2015. Information provided by the candidate in this application may be used in communication about this program.

Personal Information

Name: Agnes M. Slayman Nickname: N/A
 Complete name of school system: Chester County School District
 Office address: 509 District Office Drive
 City: Chester State: South Carolina Zip: 29706
 Phone: 803.379.3149 (cell) Fax: 803.581.6965 E-mail: aslayman@chester.k12.sc.us

Education

Schools Attended	Degrees	Dates
University of South Carolina, Columbia	Doctor of Philosophy (Ph.D.) Education Administration	1997
University of South Carolina, Columbia	Educational Specialist (Ed.S.) Education Administration	1994
University of South Carolina, Columbia	Master's In Education (M.Ed.) Education Administration	1987
University of South Carolina, Columbia	Bachelor of Arts In Education (B.A.) Secondary Education	1982

Administrative Experience

Positions Held	School Systems	Dates
Superintendent	Chester County School District	Jan. 2012-present
Assistant Superintendent Instruction Executive Director of Secondary Education	Kershaw County School District	2003-Dec. 2011
Principal of North Central High School	Kershaw County School District	2002-2003
Principal of North Central High/Middle School	Kershaw County School District	1997-2002
Assistant Principal, Lugoff-Elgin High School	Kershaw County School District	1991-1997
Program Administrator, Sunimer School	Morris Village, South Carolina Department of Mental Health	1988-1991



Professional development activities

	Dates
1. South Carolina School Boards Association, Annual Conference	2012-present
2. Microsoft's Showcase Schools Redefining Learning Conference, Bellevue, Washington	March 2015
3. President Obama's ConnectEd Superintendent's Summit, White House One (1) of 120 superintendents nationally - invitation only event.	November 2014
4. Microsoft Global Forum, Miami, Florida, Speaker and Conference Attendee	November 2014
5. Winthrop Administrative Leadership Training, attendee w/ Principals and District Leadership	June 2014

Publications/Articles/Presentations

	Dates
1. Microsoft In Education You Tube Video on Transforming Education in Chester County	December 2014
2. Microsoft Global Education Forum, Miami, Speaker - Public/Private Partnerships	October 2014
3. Blog with Margo Day, Vice President of U.S. Education Microsoft, White House ConnectED	June 2014
4. District Administration Magazine, Technology Integration	January 2013
5. Business Mobility Conference, New York City, Speaker	November 2013
*Speaker at Idaho Administrators Conference	August 2015
*Speaker at AASA and ASCD (see conf. programs, unable to attend) future invitation extended	Feb/March 2015
*Speaker at FETC State Technology Education Conference (Florida), ISTE (New York), One to One Symposium (Texas), National Staff Development Conference (Tennessee), Technology Think Tank (California-Invitation only);	2004-2014
*Windows Wide Open and Tech Net (articles/blogs) National White Paper on Technology Integration, SCETV <u>In Our Schools</u> on Technology, SCASA technology presentation; CoSN Case Study, Technology and Learning magazine, Scholastic, Touch magazine (International)	2004-2014
*Consultant with Educational Collaborators an International Group of Collaborators Specializing in Strategic Planning, Professional Development and Technology Integration around the globe	2010-present

Community/Leadership

	Dates
1. Chester County Economic Development, Executive Board	2012-present
2. Upper Midlands Rural Health Network, Board of Directors	2012-present
3. Rotarian (Chester 2012-present and Kershaw 2003-2011)	2003-present
4. Chester Lions Club, Member	2015
5. Chester County Development Foundation, Board of Directors and Secretary	2013

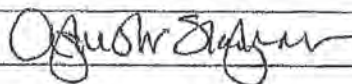
1. Explain a strategy you have employed to close a district-level gap in one of the following areas: socioeconomic status, ethnicity, special education or gender. Please use specific data to describe the gap before your strategy was employed and after your strategy was employed. The gap you chose may apply to any student grade-level or subject area. Describe why you believe what you did, rather than something else, led to the change.

The district's mission statement reads "A Great Place to Grow, Committed to Excellence for ALL Students." ALL students—not just students with means. I was hired to use my past experiences and expertise to lead the Chester County School District through a one-to-one technology initiative—no small task given its 82% poverty rate. As I led my team to develop this complex program, we focused on the need to close academic gaps using technology, not exacerbate ones between our have and have-not children. From this desire to serve our entire student population came our hiTEC initiative (*Helping Integrate Technology, Education and Careers*). Based on a survey, approximately 71.7% of our high school students and their families would not be financially capable of purchasing a personal tablet/laptop nor would these same students have home Internet access; their lack of technology exposure was keeping these students from being proficient users of state-of-the-art devices and software. After the implementation of hiTEC, all high school students now have access to a tablet 24/7. Through a private business partnership I forged, our students also now have free Wi-Fi hotspots located throughout our county. We are already seeing drastic changes in the classroom. An exciting example is from a veteran English teacher at our largest high school. Fall 2013 End Of Course scores (prior to hiTEC) were at 72.8 (average score) with a 64.3% student pass rate. Fall 2014 End of Course scores (2 semesters after hiTEC launched) showed remarkable student growth and were at 78.8 (average score) with a 95.8% pass rate! This teacher firmly believes the use of technology contributed to this dramatic increase—technology allows students to be actively engaged in the learning process. hiTEC levels the playing field here in Chester County and gives ALL students equal opportunities to grow and explore.

As another creative part of hiTEC, we have started Telemedicine and C.A.T.C.H. (Coordinated Approach to Child Health). Telemedicine enables students who become ill while at school to be virtually examined by a physician (medical instruments are equipped with cameras) without ever leaving the office of the school nurse. One of the most important elements tied to student achievement is the time a student spends in class with a quality teacher. Programs such as Telemedicine help us keep our students healthy so student absences from class will be minimized. Since Telemedicine began last year, all three Telemed schools have seen an increase in student attendance rates, from an average of 95.6% to 96.4%. Our C.A.T.C.H. program is designed to help students learn healthy lifestyle choices and develop positive habits such as daily exercise. Our new C.A.T.C.H. "brain gym" has fun kid-sized exercise equipment that face computer monitors. While a student exercises on a piece of equipment, he/she can practice multiplication tables or review state capitals from a PowerPoint presentation on display. Students have very much enjoyed this program and attendance rates at our two C.A.T.C.H. schools have also increased from 95.85% to 96.25%. The academics have followed. Both C.A.T.C.H. schools made significant academic gains and raised their ESEA report card grades to a "B."

I also want hiTEC to give our students the skills needed to be college and career ready. I created the SWAT team (Students Working to Advance Technology) as a way to add qualified technicians to our Information Technology staff. High school students receive instruction through our Career Center and are then paid to complete tech-related maintenance throughout our schools. Not only have these students enjoyed hands-on learning, but our district has saved much money and man-power by using in-house help. Last year our SWAT team set up two new labs, saving the district an estimated \$4,850.00 on these projects alone. These students also reimaged more than 100 laptops that were not being used (they needed upgrades to run on our system) but now are in the hands of elementary students. Team members are experts in repairing printers, Promethean boards, and broken tablets across the entire district.

Quantitative data only tells part of our story. Qualitative data tells the other. When you walk into classrooms and see teachers acting as facilitators and students engaged in their learning that is transformation. When students who did not even know what a tablet was, how to turn it on, or did not know how to email are producing amazing classroom products—that is leveling the playing field. When the focus for the beginning of a school year changes from a motivational speaker to teachers conducting sessions and sharing ways to integrate technology into classrooms and personalizing learning, that is change taking place. When staff chooses to take risks and allows students to show what is possible by giving them control and responsibility as interns in buildings and classrooms; then we are truly becoming committed to providing a college and career ready workforce. When the business community actively supports the changes being made in the district, invests in the changes, and are cheerleaders for the district—those are genuine partnerships! hiTEC has changed the classrooms of the Chester County School District into technology-rich learning environments. The initiative is improving the quality of education (and life) of students—giving our young people the skills they will need to compete in a global economy. I am very proud that my administrators, teachers, board members, business and industry leaders, and community members have accepted my ideas and embraced these important and progressive changes, and that students of all ages—from all backgrounds—are already seeing the benefits from our concerted effort.



Signature of Applicant

2. Explain what you have done to clearly communicate to all constituencies the purpose of your district, the future it is creating and the indicators of progress you are tracking. How have you brought diverse members of your community together in support of your school district? Also, describe the specific actions you expect your staff to take to achieve the district's long-term purpose and short-term goals.

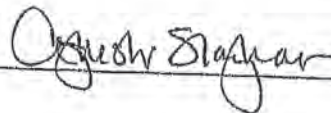
When I began working for the Chester County School District, I knew I needed to accurately communicate our primary mission to all stake holders: *academic excellence for all students*. I particularly challenged employees to always ask themselves "Is this plan/idea in the best interest of our students and will it raise student achievement?" With a strong clear mission in focus, I set about working with our school board and school leaders to create a road map to success. We settled on four important goals to move our district forward: 1. Hire the best people for all positions. 2. Have facilities that support a technology-rich learning environment. 3. Be good stewards of our money and focus it on teaching and learning. 4. Ensure our graduates are able to compete in a global economy by providing them with access to technology.

I next established "Superintendent Cabinets." There are five cabinets—teacher, administrator, support, student, and parent. These Cabinets meet throughout the year; members are updated on district happenings/events, especially those pertaining to the four goals. Members are also encouraged to give feedback to me and my senior staff. The Cabinets have been an excellent way to disseminate and gather information. It is vital to hear various perspectives and I have made significant changes based on recommendations from these groups.

Acknowledging that our district had a serious perception issue in the community, I knew it was important to restore our Communications Department to correct our image; I hired a district alumna as the Public Information Officer (PIO). She oversees "Communication Contacts" in each school; these contacts manage each school's Facebook page and website, and pump weekly information/news to our PIO, our local newspaper, radio and television stations. The district also boasts a very active website, phone app/Call Connect system, Facebook page, and Twitter account. These resources are invaluable in keeping parents and community members connected to our schools. Photos posted show engaged and excited students learning in their classrooms, on field trips, playing sports, receiving awards, doing community service, and performing in plays and concerts. Statistics from social media sites give us instant feedback on which news stories most interest parents, grandparents, and/or students. I also have staff members conducting surveys to monitor employee, parent and student thoughts and opinions.

Keeping my Board of School Trustees updated on district matters and involved in important decisions has made these members strong vocal advocates of our district. I also work closely with local legislators to keep both me and them up-to-date on state and federal education issues. Together, we all promote our district in the community and beyond. I recently met with top educators from the United States Department of Education at the White House to discuss technology integration. I have also spoken at several Microsoft conferences and participated in case studies for them—all in an effort to share best practices with others and establish our district as a national leader in K-12 education. I serve on several boards, including Economic Development, and am an active member of the Lions Club and Rotary. I attend many school and community events both as a participant and as a guest speaker, plus I rarely miss a football game at any of my three high schools! Being highly visible and approachable in the community has helped me bring diverse members together to accomplish our mission. I have had tremendous support from local business and industry, as well as significant financial contributions for specific programs (such as C.A.T.C.H. and Telemedicine) from groups such as the Chester Healthcare Foundation and Chester County Public Education Foundation. New partnerships with TruVista Communications and York Technical College are further proof that we are communicating our mission effectively and are getting the support of influential organizations.

I understand that most importantly I need my team of administrators and teachers to buy-in to our mission. They are our school ambassadors in the community and I expect my staff to work diligently to push us forward. I have not been disappointed! Together, we are providing excellent opportunities for our students and are truly focused on academic success for ALL.



Signature of Applicant

3. Please include four letters of support. Letters from current staff will not be considered.

Please see attached letters of support

- A. ✓ Chester County Legislative Delegation
- B. ✓ Denise C. Lawson, Chairman, Chester County Board of School Trustees
- C. ✓ Dr. Michael Fanning, Director, Olde English Consortium
- D. ✓ Mr. Brian Singleton, President & CEO, TruVista Communications
- E. ✓ Mr. William H. Bundy, President, Chester Healthcare Foundation
- F. ✓ Rev. Terry O. Feaster, Pastor, Mt. Olive Baptist Church

F. G. "GREG" DELLENEY, JR.
CHAIRMAN



HOME ADDRESS
127 WEST END STREET
CHESTER, SC 29706

The South Carolina House of Representatives
Judiciary Committee

H. O. Box 11887
Columbia, South Carolina 29211
(803) 734-3120

March 25, 2015

Ms. Elizabeth A. Phibbs
Interim Executive Director
SC Association of School Administrators
121 Westpark Blvd.
Columbia, SC 29210

Dear Ms. Phibbs,

We, the Chester County Legislative Delegation, are honored to recommend Agnes Slayman as the Superintendent of the Year for the State of South Carolina. Mrs. Slayman has served as the Superintendent of Chester County Schools since 2012. There is no doubt that during this short time in Chester that she has made a huge difference in our schools. We believe that Chester has never had a Superintendent with the people skills, passion for education, and dedication to children that we have witnessed in Agnes over the past three years.

Shortly after Agnes' arrival in Chester, she began meeting with legislators and district teachers in order to build strong relationships with teachers and community leaders. The relationships that she has built with legislators and teachers have never been better in Chester County. Teachers have better morale. Parents feel they have someone in the Superintendent's office that cares and is open to listening to their concerns. The Chester County School Board is made up of a diverse group of individuals. Under prior Superintendents Board meetings were long and at often times combative. Because of Agnes' leadership style, the Board now works together and as a result, they are accomplishing great things in the Chester County Schools. Mrs. Slayman has also reached out to the business community and has served on the Economic Development Board of the County and she has forged both the private business/public education partnership with our local communication company, TruVista.

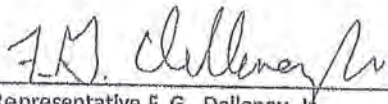
Mrs. Slayman has worked hard to improve the district's overall image and she has been successful. Because of her hard work, we are now able to recruit and retain the brightest educators. Because of her hard work, new businesses and families are moving to Chester. Because of her hard work, she was selected to attend the US Department of Education's Connect ED summit at the White House this past fall. While in Washington, DC she heard President Obama speak on the importance of technology

Integration in education and then she met with top education leaders from all over the country. Agnes has also traveled at the request (and funding) of Microsoft to talk about the transformation of our

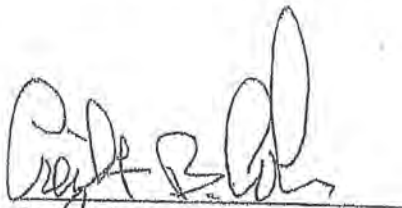
district into a leader in technology in the classroom. There is no doubt that the image of Chester County Schools has remarkably improved under Agnes' leadership.

Agnes Slayman is an exceptional leader and has the character and work ethic that is beyond reproach. There is no one more deserving or better qualified to be named the South Carolina Superintendent of the Year.

Sincerely,



Representative F. G. Dellaney, Jr.
Chairman of the Chester County Delegation
SC House District 43



Senator Creighton B. Coleman
SC Senate District 17



Representative Dennis C. Moss
SC House District 29



Representative Mary Gail K. Douglas
SC House District 41

Chester Healthcare Foundation

Wm. H. Bundy *President*

P.O. Box 249
Chester, SC 29706

Daniel C. Peach *Chairman*

803-581-2027
Fax 803-581-2028

April 2, 2015

Ms. Elizabeth A. Phibbs
Interim Executive Director
SC Association of School Administrators
121 Westpark Boulevard
Columbia, South Carolina 29210

Dear Ms. Phibbs:

It is with pleasure that I respond to a request to provide a reference regarding Dr. Agnes Slayman for the honor of Superintendent of the Year.


I have known Dr. Slayman since her arrival in Chester County. She began with a "bang" and has not slowed down. Dr. Slayman has worked hard to bring the Chester County School District to its new precipice. Her involvement with advancing computerization within the district is without equal.

Dr. Slayman's not "can do" but "will do" attitude is infectious but not with a "down-your-throat" approach. Dr. Slayman may be short of stature, but is filled with a "tall" spirit for the accomplishment of established goals and objectives.

In addition to her role as superintendent, Dr. Slayman is an avid and supportive community worker, as evidenced by her undying efforts with Rotary, the Chester Development Association, and the Chester County Public Education Foundation.

Finally, Dr. Slayman is the only individual I have ever known who utilizes "barriers" to accomplishing goals and objectives as "stepping-stones" to success.

If I may provide additional information, please contact me.



Wm. H. Bundy
President

Terry O. Feaster
521 Pecan Court
Chester, SC 29706
revtofeaster@truvista.net

April 8, 2015

Ms. Elizabeth A. Phibbs
Interim Executive Director
SC Association of School Administrators
121 Westpark Blvd.
Columbia, SC 29210

Re: Superintendent of the Year Nomination

Dear Ms. Phibbs,

I am pleased to submit this nomination in support of Dr. Agnes Slayman for Superintendent of the Year. Dr. Slayman is a very active and visible superintendent throughout our wonderful community. I have been impressed with Dr. Slayman's participation at the events held by the schools within Chester County School District. In addition to making sure learning is a top priority, she supports all area sports teams, the arts, and reading programs. She also builds into her busy schedule time for classroom reading to students.

Dr. Slayman is cognizant of the fact that educating children is not limited to the school classroom and has partnered with the local clergy and faith community to implement a mentoring program for at risk youth in our school district. Dr. Slayman's desire and goal is that no child is lost and that all children have their voices heard.

It will be a well-deserved accolade for Dr. Agnes Slayman, the fine superintendent of the Chester County School District, to be named Superintendent of the Year for South Carolina. I am honored to call her my friend and a friend to the children of Chester County!

Sincerely,



Pastor Terry O. Feaster

Olde English Consortium

1014 McCandless Road, Chester, South Carolina 29706

Phone (803) 385-5143 * Fax (803) 385-2174

FanningOEC@gmail.com

www.oldeenglishconsortium.org

April 6, 2015

Ms. Elizabeth Phibbs
Interim Executive Director
South Carolina Association of School Administrators
121 Westpark Blvd., Suite A
Columbia, SC 29210

Dear Ms. Phibbs,

I am honored to recommend Dr. Agnes Slayman for SCASA Superintendent of the Year. I have had the pleasure of working with Dr. Slayman for the past four years and find her to be a tireless, passionate advocate for Chester County. Before she arrived, Chester had been through a number of "short-time" superintendents. Immediately upon her arrival, Dr. Slayman focused on building (and re-building) relationships throughout the county. These relationships have served as the *foundation* for her successful educational reforms - transforming Chester County Schools from mediocre to a leader in our consortium region.

The Olde English Consortium (OEC) is a 501-C-3, non-profit, educational collaborative seeking to promote excellence in education through collaboration. Founded in 1976, the OEC's members include the Cherokee, Chester, Chesterfield, Clover, Fairfield, Fort Mill, Lancaster, Rock Hill, and York school districts, as well as our two higher education partners - Winthrop University and the University of South Carolina Lancaster. A goal of the OEC is to bring all educational stakeholders together to improve education throughout the region. The focus of the consortium is on professional development and student achievement - sharing resources among districts (and higher education partners) in order to improve the quality of teaching & learning in public school classrooms.

As Executive Director of the OEC, I have been impressed with Dr. Slayman's commitment to collaboration; enthusiasm for tackling tough issues; and knack for seeing and replicating cutting-edge best practices here in Chester County. I have served the OEC since 1998. For many of these years, I was excited Chester was in the OEC - so that they could learn from the Fort Mill's, Rock Hill's, and Clover's of our region. Chester County students (including my own son) deserved the same quality education of these wealthier, progressive districts. Having Chester in the consortium insured that they were able to learn and steal from other surrounding districts - improving teaching & learning in our Chester County Schools. But since Dr. Slayman arrived, she has *flipped the script!* We now have these same districts coming to Chester to learn about what Chester County Schools are doing with Microsoft... how Chester created WiFi throughout the county... and how Chester has transformed its image to a cutting-edge, progressive destination for our best & brightest educators!

Dr. Slayman didn't simply come to Chester from Kershaw with her "plan for reform" in place. From *Day One*, she began building, nurturing, and sustaining relationships with all of our stakeholders - *finding out from them* what they saw as the major problems... what they wanted out of their local public schools. She has been a constant presence throughout Chester County. And not just a "drop in" guest; but an active participant and leader on everything from school-community partnerships, faith-based and community action groups, and local

*Serving Cherokee, Chester, Chesterfield, Clover, Fairfield, Fort Mill, Lancaster, Rock Hill, & York Schools
Winthrop University and the University of South Carolina Lancaster*

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chambers of commerce and our Economic Development Board. Dr. Slayman built a vision together with educators, business leaders, preachers, parents, etc. -- uniting a county which had been stuck in mediocrity. Not only did these relationships build support for change; but they allowed Dr. Slayman to accomplish more than she could have on her own.

Perhaps the biggest example of her collaborative educational reform efforts has been in the area of technology. In recent years, numerous districts have moved towards implementing one-to-one computer programs. Dr. Slayman heard her community cry that their students were just as deserving of such a program as surrounding districts; but she also faced the economic reality that Chester didn't have the financial resources that their neighbors had to *pay* for one-to-one computers. In developing her relationships, she was able to nurture one with Microsoft which led to Chester becoming a state and national leader in its classroom technology efforts. As a result Chester's unique Microsoft "one-to-one" initiative, in the last year, Dr. Slayman was one of a select few superintendents nationwide to be invited to attend the US Department of Education's ConnectEd summit at the White House.

But what is good is a computer in the hands of every child... of every family household in Chester County, if folks in this poorer, rural county have little access to the internet at home? Dr. Slayman worked with her local community to identify this as not just an *educational*, but a *community* problem. As a result of those early nurtured relationships, she partnered with TruVista and local businesses to offer free WiFi hotspots all across Chester County. Little ole' Chester County -- long the follower of neighboring York districts -- is now a leader in both instructional technology and connecting local, rural families with the rest of the world via WiFi Internet access.

Collaborative problem-solving is a mark of the Slayman superintendency. She meets regularly with both lawmakers and teacher-leaders -- insuring there is proactive legislative policy coming out of Columbia to meet the needs identified in Chester County. Dr. Slayman brings all stakeholders together to improve the school district's image -- in order to attract and retain the very best educators and businesses into the County. No better testament to this effort is the recent acquisition of Giti Tires and their investment coming into Chester County. This major economic development effort was a result of legislators, county council, the local chamber of commerce, the governor and, yes, Dr. Agnes Slayman -- all working together to secure a major manufacturing plant to employ thousands of workers in a county with one of the highest unemployment rates in the state. These types of collaborative victories are examples of Dr. Slayman's dedication to improving the quality of life for Chester County students, their parents, and our entire community.

Over the past 17 years, I have worked with 60+ superintendents and I continue to be impressed with all that Dr. Slayman has accomplished in these last few years. Of my eleven members, I get to see, first-hand, Chester's accomplishments the most because the OEC office is located in downtown Chester. Additionally, last year, Dr. Slayman was elected by her peers to serve as the Chairperson of the OEC Board of Directors. In her role as chair, our 11 consortium member districts/institutions began to tackle many of our increasing challenges: from teacher evaluation to new standards & assessments to a new "Read-to-Succeed" initiative. Dr. Slayman used her team-building skills to focus on Olde English Consortium like a laser-beam on helping our members districts accomplish state mandates more efficiently and effectively than they'd be able to do on their own.

*Serving Cherokee, Chester, Chesterfield, Clover, Horryfield, Fort Mill, Lancaster, Rock Hill, & York Schools
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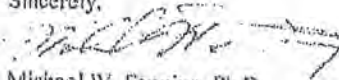
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As a result of Dr. Slayman's collaborative work with her fellow superintendents, the OEC has been able to, among other things, co-sponsor the first two "State Championships in Academies" in the history of South Carolina; provide rich content-specific staff development to thousands of OEC educators, across district lines; and bring the best and brightest from across the state and country to our region. Dr. Slayman has led her region's superintendents to refocus their legislative advocacy efforts to a more collaborative approach - citing the "power in numbers" need for a more collective voice. Under her leadership, we have regular meetings with our legislators and key state leaders - not just meeting with them; but nurturing and sustaining real relationships, like Dr. Slayman has done locally in Chester County.

I am honored to recommend Dr. Agnes Slayman for State Superintendent of the Year. Dr. Slayman is a tireless advocate for public education and her local community. She is an outstanding educational leader. She would represent SCASA and the state's superintendents well. Please do not hesitate to contact me if I can provide further information.

Sincerely,



Michael W. Fanning, Ph.D.

Executive Director

Olde English Consortium

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Winthrop University and the University of South Carolina Lancaster*



Brian Singleton
112 York St.
Chester, SC 29706

April 6, 2015

Ms. Elizabeth Phibbs
Interim Executive Director
South Carolina Association of School Administrators
121 Westpark Blvd., Suite A
Columbia, SC 29210

Dear Ms. Phibbs,

I am honored to nominate Chester County School District's Superintendent Dr. Agnes Slayman for SCASA Superintendent of the Year. I have gotten to know Dr. Slayman through our joint work on the Chester County Economic Development Board. She has a deep understanding of the impact of the local school system on economic development. She realizes that businesses need a well-educated workforce—potential employees who have both soft and technical skills. In her three years as superintendent, Dr. Slayman has focused on improving the district by implementing progressive programs such as hiTEC (Helping Initiate Technology, Education and Careers), a one-to-one initiative that places tablets in the hands of all high school students.

As Dr. Slayman began to develop hiTEC, she worked hard to build support for the program. She kept parents and students up-to-date on the process but also reached out to local businesses for help. State-of-the-art tablets are essential for today's students, but in Chester County, many families simply cannot afford access to the Internet. Although TruVista Communications provides excellent service county-wide, school leaders requested that Wi-Fi hotspots be placed in public places throughout the district to ensure that all students have fair and equal online access after school hours. TruVista was pleased to partner with the Chester County School District to provide these access points. Students can now receive free Internet connection using their district-issued device when they connect to one of these hotspots.

The partnership between TruVista and the Chester County School District was a first of its kind private business/public education venture in South Carolina. I am proud to have been part of the process and, like Dr. Slayman, want to invest in the future of this county through the education of its young people. Dr. Slayman has been instrumental in bringing positive innovative changes to the district, and is well deserving of this fine award.

In closing, I ask that you give strong consideration of Dr. Slayman for this prestigious award. She certainly possesses the qualities you associate with leadership in education and her achievements driving positive change for our students has been extraordinary. Thank you for your serious consideration and I wish you much success in all future endeavors.

Highest Regards,

J. Brian Singleton- President & CEO

Denise C. Lawson
805 Lingle Lane
Chester, SC 29706

April 8, 2015

Ms. Elizabeth Phibbs
Interim Executive Director
South Carolina Association of School Administrators
121 Westpark Blvd., Suite A
Columbia, SC 29210

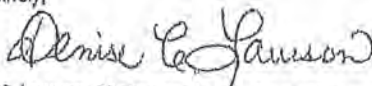
Dear Ms. Phibbs,

It is my pleasure to recommend Dr. Agnes Slayman as a candidate for the distinct honor of SCASA Superintendent of the Year for 2015. As a twenty-one year veteran of the Chester County School Board of Trustees, I have had the opportunity to work with numerous superintendents. When I first met Dr. Slayman, aside from her excellent qualifications, I was impressed by her enthusiasm, her energy, and her expressions as she shared her vision for our district and our students. While faced with the challenges of a rural, high unemployment county, Dr. Slayman recognizes these things can impact achievement, but is adamant it is not an absolute. It is not an excuse for children not to learn and to be successful. Her strategy is this, first you must set the bar to compete in a global environment. Then you must hire and retain the best of the best. This month we will be given the results of a salary study she initiated to promote retention and provide competitive salaries for our employees to close the hiring gap with other districts. In the short three years she has been our superintendent I have witnessed more progress than ever before. Her determination to provide an opportunity, a highly qualified faculty, the resources needed, and a safe and welcoming environment to every student in the district is phenomenal. At the center of every project, proposal, program, or vision Dr. Slayman contemplates two questions: "Is this in the best interest of our students and will this endeavor increase student achievement?" This is who she is, a champion for children.

So many changes and opportunities have occurred in the last three years. Due to limited space I cannot list them all. Under the leadership of Dr. Slayman, we were chosen to be a Microsoft Partnership District; one of twelve in the United States. We are recognized today as a leader in technology integration. The HITEC program (Helping Integrate Technology, Education and Careers) is a One-to-One technology initiative. This program provides all high school students the opportunity to use and take home their own tablets. Dr. Slayman built a relationship with TruVista and Comporium Communication to supply Wi-Fi hotspots throughout the county with no cost to the district. This technology has provided every student and their families an opportunity to explore the world and prepare for the future. This initiative began with placing Promethean boards in all classrooms and has led to Telemedicine, one of two in the state. Dr. Sam Stone, using state of the art technology, can check the vital signs of a sick student examine their ears and throat and the student never leaves the school. With the generosity of the Chester Healthcare Foundation and the confidence they had in our leadership this was all made possible. Dr. Slayman also orchestrated a partnership with York Technical College to bring a Youth Apprenticeship program to our county. Through more networking, we now have EnvisionSC in our schools. Our students are connecting with classrooms all over the world by using video technology. Our children are learning first hand other cultures, foreign languages and sharing their life as a South Carolina student in a rural community. Dr. Slayman established the C.A.T.C.H. (Coordinated Approach to Child Health) Initiative in two of our elementary schools to "grow" healthier children which was funded by a local grant. The district is fully accredited and received high marks by AdvanceED. We have numerous Palmetto Gold and Silver schools and Lewisville High School received a perfect 100 on the SC report card for the past two years.

In conclusion, Dr. Agnes Slayman has demonstrated a high standard of ethics, honesty, integrity and fairness; she has earned the respect of this board, the legislative community, her professional colleagues, the school district employees and the community. She is a very modest person and is quick to tell you she has not accomplished this alone. She has an amazing talent of bringing together the people of the community, business leaders, school personnel, parents and students to be a part of her "team". Whether she is having breakfast at a local restaurant solving the world's problems, on the sidelines of a school sports event or meeting at the White House to discuss technology with the President of the United States, she is one outstanding female, one outstanding superintendent, one outstanding advocate for children, ALL children. In my humble opinion, you will not find another person more deserving of SCASA Superintendent of the Year than Dr. Agnes Slayman. As I stated earlier in this letter, she is a champion for kids.

Respectfully,



Denise C. Lawson, Chairman, Chester County School Board of Trustees



THE SCHOOL DISTRICT OF CHESTER COUNTY

509 DISTRICT OFFICE DRIVE
CHESTER, SOUTH CAROLINA 29706

PUBLIC STATEMENT

The Chester County Board of School Trustees completed Dr. Agnes Slayman's performance evaluation for the 2013-2014 school year during executive session at their regularly scheduled board meeting on September 15, 2014.

The Board Chair, Patricia Hensley, read the following statement in open session:

"This Board of School Trustees unanimously concur that the Chester County School District is fortunate to have you as our committed educational leader. You are truly dedicated to our students as you focus your efforts on increasing student achievement and improvement of teaching and learning. We especially appreciate your efforts to work with this Board to provide governance and leadership, to give purpose and direction to our work, and to assist us with providing resources and support systems for our schools."

The board commends the district's achievement of AdvancEd accreditation and its continued hiTEC initiative. The district has also achieved national recognitions as a Duke Energy Power Partner, a member of the Microsoft Alliance Partnership, the EnvisionSC Global program and *U.S. News and World Report's* awarding Great Falls High School and Lewisville High School Bronze level recognition.

In recognition of Dr. Slayman's outstanding performance evaluation, the board unanimously extended the superintendent's contract through June 30, 2019. The board and the superintendent set goals for the 2014-2015 school year to increase academic achievement, promote competitive salaries for employees, and provide school facilities that support technology and student learning.

The board looks forward to working with Dr. Slayman in planning for the future of the students of Chester County Schools.

(Mrs.) Patricia M. Hensley
Chair, Chester County
Board of School Trustees



To: Dr. Slayman

From: Rusty and Jackle P [REDACTED]

Re: Mrs. Ligon

The purpose of the letter is to inform you of the situation with my son, [REDACTED] Logan P [REDACTED] and dealing with the CCSD department of special services under the supervision of Mrs. Jeanie Ligon, director.

My son struggled to pass Spanish in all 5 years he was in college. He went to after school tutoring, mandatory baseball study halls and had his notes copied for him along with extra time on test but all of this was not helping. It wasn't until my wife talked with Patti Davis, a school psychologist at Fort Mill High School, we found out that our school district should have sent in the proper paperwork (being a waiver) for him to be able to waive foreign language due to his learning disability. Mrs. Davis said that she had to do it for several of her former students. Mrs. Ligon told us at one point she has never done this.

We got in touch with Mrs. Kim Shannon at Lander University. She works in the department of special services at Lander. She told us all we needed to do was get the paperwork from our school district. So we contacted Mrs. Della Hunsucker, who tested Logan his senior year, the early part of January. Mrs. Hunsucker told me she is retired but would look into what she needed to do to get the proper paperwork to Lander. On the next day, Jan 8th, Mrs. Ligon called my wife and they discussed what was needed. My wife didn't know what forms or papers were needed to be sent but neither did Mrs. Ligon so my wife gave Mrs. Ligon the phone number of Mrs. Shannon at Lander. We even ask Dr. Sam Stone to write Lander to let them know of his disability but that wasn't enough or wasn't what they needed. On Jan 16th, Mrs. Shannon from Lander told us that what Mrs. Hunsucker sent wasn't what she needed. As she states in a previous email she needed a letter requesting a waiver because of his learning disability. She had the psychological report from CCSD but needed to have added that it was in the best interest of the student that his foreign language be waived by a waiver form.

We were not sure why Mrs. Ligon got involved because she never had any dealings (never attended an IEP meeting one) with my son. She doesn't even know my son who she calls [REDACTED] and everyone that has had any dealings with my son knows that he goes by Logan. My only guess is that Mrs. Hunsucker had been retired and she was taking it on herself to try to tell us what he needed to do like take a sign language class that was not even offered at Lander or even being diagnosed with having anxiety.

My next step was to get those involved that knew my son like Mrs. Lancaster, his high school resource teacher and Dr. Knox, his principal. They said they would write a letter asking for the foreign language to be waived in hopes that would help. Dr. Knox told me he would call Mrs. Ligon to ask her to advocate for a former student, my son. She did not.

My wife and daughter wanted to meet with Mrs. Ligon early in the morning on March 4th (because Logan emailed Mrs. Ligon to give us permission to speak on his behalf). We requested first thing Wednesday morning but didn't hear from Mrs. Ligon. I called Dr. Slayman to give her a heads up to



why my wife was going to be at the district office and to talk with her about what was going on with my son and Mrs. Ligon. Dr. Slayman said she knew that Mrs. Ligon would know what to do. She also will discuss with her my concerns. On the morning of the meeting my wife sat outside the district office from 8:10 until around 8:30 (when the office was open). She sat inside waiting on Mrs. Ligon for several more minutes. When Mrs. Ligon showed up at 8:40 she told my wife that she didn't have time to meet with her because she was expecting my wife at 7:30 (but she didn't get in touch with her to let her know that she would be available at 7:30 and the time on the door said 8:30) The conversation went as follows in the lobby of the district office: My wife said, "When I called you in January, why didn't you tell me then you didn't know what to do about Logan." Mrs. Ligon said, "Jackie I'm a mother too".

Lander wasn't asking for Mrs. Ligon's opinion, they were asking for her to look at the report and ask for a waiver that any school psychologist could have come to that conclusion.

After we got no help from Mrs. Ligon, Jackie took off work and headed to Lander. She got to talk with Mrs. Shannon of special services. We asked her what our next option was. She told us we could hire Dr. Cleveland, a Lander school psychologist. We paid \$300.00 to have Dr. Cleveland re-evaluate Logan. The conclusion was to tell us to compare the 2 reports, exactly what was on the CCSD psychological report (with the addition that she believed his foreign language needed to be waived). The report states what they wanted Mrs. Ligon to state as follows: "Please keep in mind that being tested doesn't mean you will receive the accommodations. A recommendation will be made according to your results and the office of student disabilities makes the final accommodations". Dr. Cleveland told us that she couldn't believe that the CCSD wouldn't do the same thing and whoever the director of special services was should be more aware of the process and her job should be in jeopardy for making us pay the \$300.00 to do what CCSD could have done. Note: this was only to suggest that his foreign language be waived not change his grade. This has nothing to do with his grades but his disabilities.

It should also be noted that on all IEP meetings (as of today) for seniors it is now suggested they each have another psychological evaluation done if they are going to college with things such as waivers for foreign language added in the reports.

EDUCATION SEPTEMBER 30, 2015 (Wed)

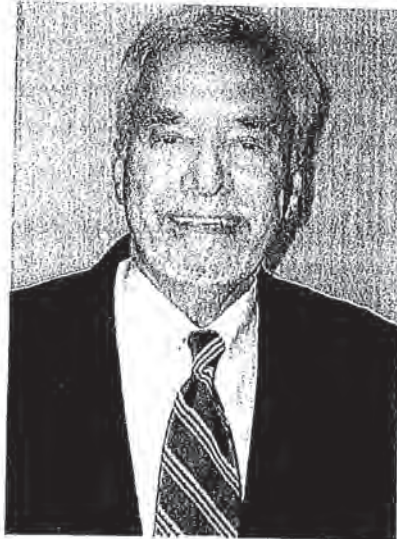
Chester board votes employee complaints 'moot,' names interim superintendent

HIGHLIGHTS

Wednesday brought another late-night session for Chester school trustees

Interim superintendent formerly worked in Fort Mill, Lancaster & Florence County

Board talked with attorneys about ex-superintendent and outstanding employee complaints



< 1 of 3 >

The Chester County school board has hired former Fort Mill Superintendent Keith Callicutt as the district's interim superintendent in the wake of the resignation of Superintendent Agnes Slayman.

BY ANNA DOUGLAS
adouglass@heraldonline.com

CHESTER — A Chester native and former Fort Mill school district superintendent will serve as Chester County schools' interim administrative leader, officials announced Wednesday.

Chester school board trustees unanimously voted Wednesday night to pay Keith Callicutt — previously a principal and superintendent in other public school systems across South Carolina — the same daily rate as Agnes Slayman was earning until her resignation from the superintendent job last Thursday.

<http://www.heraldonline.com/news/local/education/article37150815.html>



Page Four: Vita of Agnes M. Slayman

CERTIFICATIONS:

Superintendent
Secondary Principal and Supervisor
Elementary Principal and Supervisor
Social Studies
Special Education Emotionally Disabled
South Carolina Principal and Teacher Evaluation Certified
Southern Association of Colleges and Schools CASI Team Evaluator

RECOGNITIONS/AWARDS

Chester County School District (2012-2015)

- 2015 Keynote Speaker for Idaho State Administrators Conference: Transforming Education
- 2015 Chester County Youth Apprenticeship Program recognized by U.S. Department of Labor
- 2015 Nominated by Entire School Board, Business Leaders, Entire Legislative Delegation, and School Administrators for South Carolina Superintendent of the Year
- 2015 Recognized by the MLK Celebration Committee of Chester County at the Chester County Council Meeting by Mary Guy for Exemplary Participation in the 2015 Martin Luther King Committee Activities in Chester County
- 2014 Selected to attend President Obama's White House ConnectEd Superintendent's Summit
(One of 120 superintendents nationally at the invitation only event)
- 2014 Speaker on International Panel at Microsoft's Global Forum in Miami, Florida
- 2014 Two high schools named U.S. News and World Report Best in the Nation Bronze Schools
- 2014 Educator of the Year by the South Carolina Resource Officers Association
- 2014 Nominated by external individual for S.C. Superintendent of the Year
- 2013 Speaker at Microsoft's Business Mobility Conference in New York City, New York
- 2013 Superintendent of the Year, S.C. Career and Technology Administrators Association
- 2013 Chester County School District named Microsoft Alliance Partnership School District
(Only school district in the southeast and one of 12 in the United States)
- 2013 Agnes Slayman and Chester County School District named Duke Energy Power Partners
- 2012 Great Falls Elementary selected as Microsoft Pathfinder School
(One of 99 schools in 51 countries and only 1 of 6 in the United States)

Kershaw County School District (1991-2011)

- Nominated by internal administrators for S.C. School Administrator of the Year
- District Received Palmetto Pillar Technology Award by the Columbia Chamber of Commerce
- Selected for Palmetto Leadership - Kershaw County Chamber of Commerce and Clemson University
- Served as Administrators Program Mentor and Administrator/Student Teacher Site Supervisor

Richland School District One (1983-1991)

- Special Schools Teacher of the Year (Richland School District One)
- Recipient of Teacher Incentive Program Award (Richland School District One)

Other:

- National and State Education Speaker – ISTE (New York); Speaker at FETC (Florida); Speaker One to One Symposium (Texas), Keynote at National Staff Development Conference (Tennessee); Keynote Technology Think Tank (California, invitation only), Speaker SCASA (South Carolina); CoSN Case Study; SCETV *In Our Schools*; You Tube Video – Transforming Education in Chester County

PUBLICATIONS:

- Collaborated on Windows Wide Open and Tech Net (articles, blogs); Authored National White Paper on Technology Integration; Collaborated on short articles in magazines (*Technology and Learning, Scholastic, District Administration, Touch Magazine*)

Prior to the Superintendent appointment, I served a consultant on an international technology team with a company that assisted educational systems across globe in the planning, implementation, and assessment of instructional technology initiatives.



PROFESSIONAL AND COMMUNITY AFFILIATIONS:

Chester

Chester County Economic Development, Executive Board of Directors
Chester County Development Foundation, Board of Directors, Secretary
Olde English Consortium, Board of Directors, Chairman and Vice-Chairman
Upper Midlands Rural Health Network, Board of Directors
Chester County Public Education Foundation, Board of Directors, Secretary
Chester County Chamber of Commerce, Member
Chester Rotary, Member
Chester Lions Club, Member
Chester County First Steps, Member
Education Leadership Advisory Board for Winthrop University
South Carolina Association of School Administrators, Superintendent's Division, Member
American Association of School Administrators, Member
Phi Delta Kappa, Professional Association for Administrators, Member
Delta Kappa Gamma Society International, Upsilon Chapter, Member
Alpha Delta Kappa International, Alpha Psi Chapter, Member
South Carolina School Boards Association, Member
National Association for Supervision and Curriculum Development, Member

Kershaw

Lugoff Optimists, Kershaw County, Member and Secretary
Fine Arts Center of Kershaw County, Board Member
Multi-Cultural Committee of Kershaw County, Board Member
West Wateree Rotary, Member
Kershaw County Teen Health Coalition, Board Member
United Way of Kershaw County, Board Member
Kershaw County Mental Health Association, Member
Kershaw County Gang Coalition Task Force, Founding Co-Chairperson, Member
Delta Kappa Gamma Society International, Upsilon Chapter, Member
Alpha Delta Kappa International, Alpha Psi Chapter, Member
National Association for Supervision and Curriculum Development, Member

SIGNIFICANT ACCOMPLISHMENTS

CHESTER COUNTY SCHOOL DISTRICT

- District attained system-wide accreditation from AdvancED.
- Microsoft partnership provided teachers and administrators with access to professional development opportunities and certifications funded by Microsoft. The professional development activities were targeted towards the sharing of “best” instructional practices among educators from across the globe. I offered my professional travel opportunities to Prague and Barcelona to Chester teachers so they could share best practices which would ultimately benefit the students in the classrooms.
- Served as a keynote speaker at events in the United States on the topic of transforming education in Chester County (example: Idaho State Administrators Conference, Microsoft’s Business Mobility Conference in New York, and in Miami on an International Panel at Microsoft’s Global Forum).
- Selected to meet with senior staff of the United States Department of Education in a group meeting at the White House (1 of 120 superintendents nationally) and also was provided an opportunity to meet individually with these individuals to talk discuss challenges and solutions facing P-12 education in the United States.
- Students in the district were also provided opportunities to BETA test products and earn industry technology certifications.
- I worked in collaboration with the Chester County Supervisor, County government leaders, and business leaders to place school district capital projects on the County One Cent Sales Tax referendum. The referendum passed. This was the first time in history that this collaboration took place between the school district and county government.
- Led the construction of a new district office building under budget and on time.
- I developed a partnership with the local telecommunications provider and we established the first public education/private industry partnership in South Carolina that provided free internet access across Chester County that served school district students and staff. Community members partnered with the school district and allowed WI-FI hot spots to be placed on government, community, and private/business locations.
- I jointly worked with community leaders and philanthropic organizations to secure funding for students participating in newly implemented after school programs in elementary and middle schools such as: Jr. Olympic Archery, Rocketry, Competitive Bass Fishing, Clay Shooting, and Robotics.
- The district implemented Telemedicine – a program that allows local physicians to use technology to remotely examine sick students at schools, provide diagnoses, and write prescriptions.
- The CATCH (Coordinated Approach to Child Health) research based program that positively impacts student achievement was developed and implemented. This program placed fitness equipment in an elementary school so children could exercise while learning.
- A partnership between the Chester County School District and York Technical College enabled Chester County students to attend dual enrollment programs free of charge.
- Supreme Court case regarding funding for students from out of district attendance areas – the district prevailed.
- Through an established partnership with York Technical College and the South Carolina Youth Apprenticeship program, the district implemented an apprenticeship program which received recognition from the U.S. Department of Labor – Advanced Manufacturing.
- Established district internship program in Technology – win-win for students and district in IT repair.
- Set up partnership with Giti Tire – district placed 3D printers and teacher training and set up competition in Science and Mathematics sponsored by Giti with cash awards for teachers and students.

Chester superintendent attends education technology summit

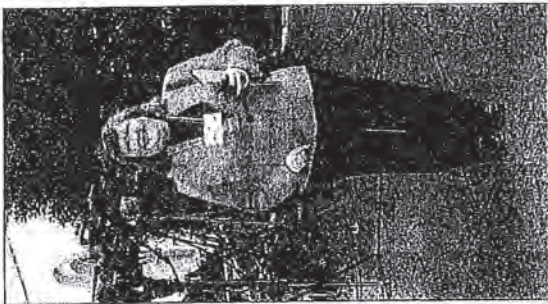


PHOTO SUBMITTED
 Agnes Slayman, Chester County School District superintendent, stands outside the White House earlier this week.

Meeting held in D.C. focused on bringing schools into digital age

By RACHEL SOUTHMAYD
 rsouthmayd@heraldonline.com

When Agnes Slayman became superintendent of the Chester County school district, she never imagined her job would lead her to the White House and a seat among an elite group of superintendents dedicated to expanding the role of technology in education.

Slayman was one of just over 100 superintendents selected to take part in Connected to the Future in Washington, D.C., a one-day meeting about "the potential of education technology and the innovations needed to bring America's

schools into the digital age," according to the official release from the White House.

The superintendents, who represented 30 states, spent Wednesday learning about what other school districts were doing, speaking with leaders from U.S. Department of Education, including Secretary of Education Arne Duncan, and hearing a speech from President Barack Obama.

Friday morning, Slayman was back in her office in Chester, calling her trip an "overwhelming and humbling experience."

"The superintendents that were there in attendance were just phenomenal," Slayman said.

During his speech, Obama announced his plan to connect all most all students in the United

States through high-speed broadband Internet in libraries and schools. Technology in schools will help students, parents and educators become "future ready," according to Obama's plan.

"It was very inspiring to be on the front end of President Obama's initiative and to be in that same inaugural class of superintendents that feel the same way about the value of technology and the value of developing a skilled work force," she said.

In Chester County, educators are ahead of the ballgame when it comes to connectivity and devices,

Slayman said. In the last year, the district's hiTEC I-1 initiative has put a Microsoft tablet into the hands of every high school stu-

SEE SLAYMAN, PAGE 6E

SLAYMAN

CONTINUED FROM PAGE B

dent. Eighth-graders were recently given the devices, as well.

Comporium and Tim Vista have worked to create WiFi "hotspots" in the community so students can get con-

nected when they're not at school, she said, and the district has many other programs in place that encourage or promote the use of technology.

Slayman's trip to Washington, and her participation in the Connected conference, have inspired her to ramp up

perintendents took the "Future Ready District Pledge," and in the near future, regional summits will be held to spread Connected's message to more schools and school leaders.

Rachel Southmayd
 803-729-4672



CHESTER COUNTY

1476 J.A. Cochran By-Pass

COUNCIL MEETING

Council Chambers

January 20, 2015
6:00 p.m.

Chairman Carlisle Roddey– Presiding

AGENDA

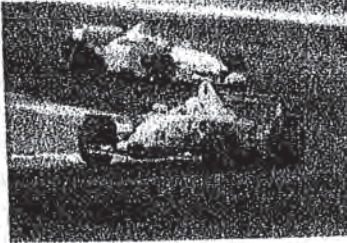
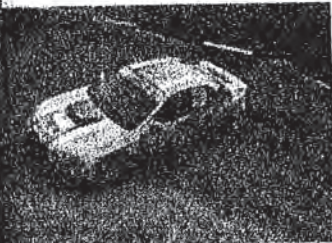
- I. Call to Order**
- II. Pledge of Allegiance & Invocation**
- III. Approval of Minutes** - (Tab #1)
 1. Chester County Council Meeting of December 1, 2014
 2. Chester County Council Special Called Meeting of December 15, 2014
- IV. Citizen's Comments**
- V. Presentation by Council Member Guy**
- VI. Ordinances and Resolutions**
 1. 2nd Reading of AN ORDINANCE (In Title Only) AUTHORIZING (1) THE EXECUTION AND DELIVERY OF A FEE IN LIEU OF TAX AND INCENTIVE AGREEMENT ("INCENTIVE AGREEMENT") BETWEEN CHESTER COUNTY, SOUTH CAROLINA ("COUNTY"), AND [PROJECT PHOENIX], ACTING FOR ITSELF AND ONE OR MORE AFFILIATES OR OTHER PROJECT SPONSORS, ("COMPANY"), PURSUANT TO WHICH THE COUNTY SHALL COVENANT TO ACCEPT CERTAIN NEGOTIATED FEES IN LIEU OF *AD VALOREM* TAXES WITH RESPECT TO THE ESTABLISHMENT OF MANUFACTURING FACILITIES LOCATED IN THE COUNTY ("PROJECT"); (2) CERTAIN SPECIAL SOURCE CREDITS IN CONNECTION WITH THE PROJECT; (3) THE BENEFITS OF A MULTI-COUNTY INDUSTRIAL OR BUSINESS PARK TO BE MADE AVAILABLE TO THE COMPANY; AND (4) OTHER RELATED MATTERS. - (Tab #2)
 2. 1st Reading of AN ORDINANCE AUTHORIZING CERTAIN ECONOMIC INCENTIVES, INCLUDING PAYMENT OF A FEE IN LIEU OF PROPERTY TAXES, PURSUANT TO A FEE AGREEMENT BETWEEN CHESTER COUNTY, SOUTH CAROLINA, AND



MLK Celebration Committee of Chester County
118 Cushman Drive Chester, South Carolina 29706
Mrs. Mary A. Guy, Chairperson, 803-385-3271
January 18-19, 2015



"Whatever your life's work is, do it well..." Dr. M. L. King, Jr.



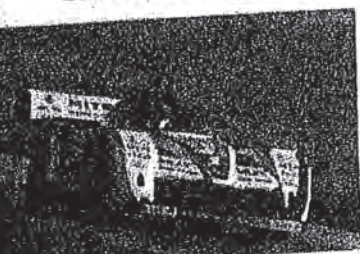
**Giti Tire
Manufacturing (USA) Ltd**
is proud to establish the
“Giti Tire Math and Science Award”
for the
Chester County School District
in Guiding & Inspiring Tomorrow’s Innovators
on the 12th of February, 2015

Agnes Slayman

Dr. Agnes Slayman, Superintendent
Chester County School District

Enki Tan

Dr. Enki Tan, President
Giti Tire Manufacturing (USA) Ltd





**SOUTH CAROLINA ASSOCIATION
OF SCHOOL RESOURCE OFFICERS**

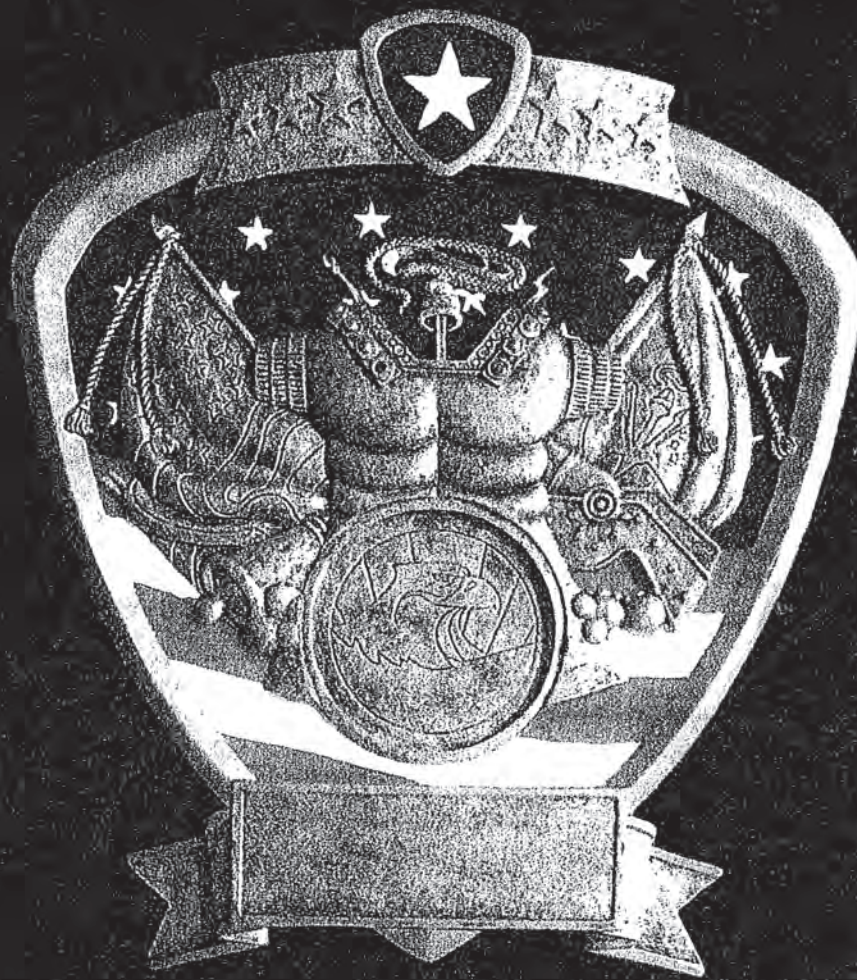
Educator of the Year

Presented to

Dr. Arnes Slayman

For Your Outstanding Support of the
School Resource Officer Program
with the School Community and Your
Dedication as an Educator.

Presented This 26th Day of June, 2014
Zina D. Harper, President

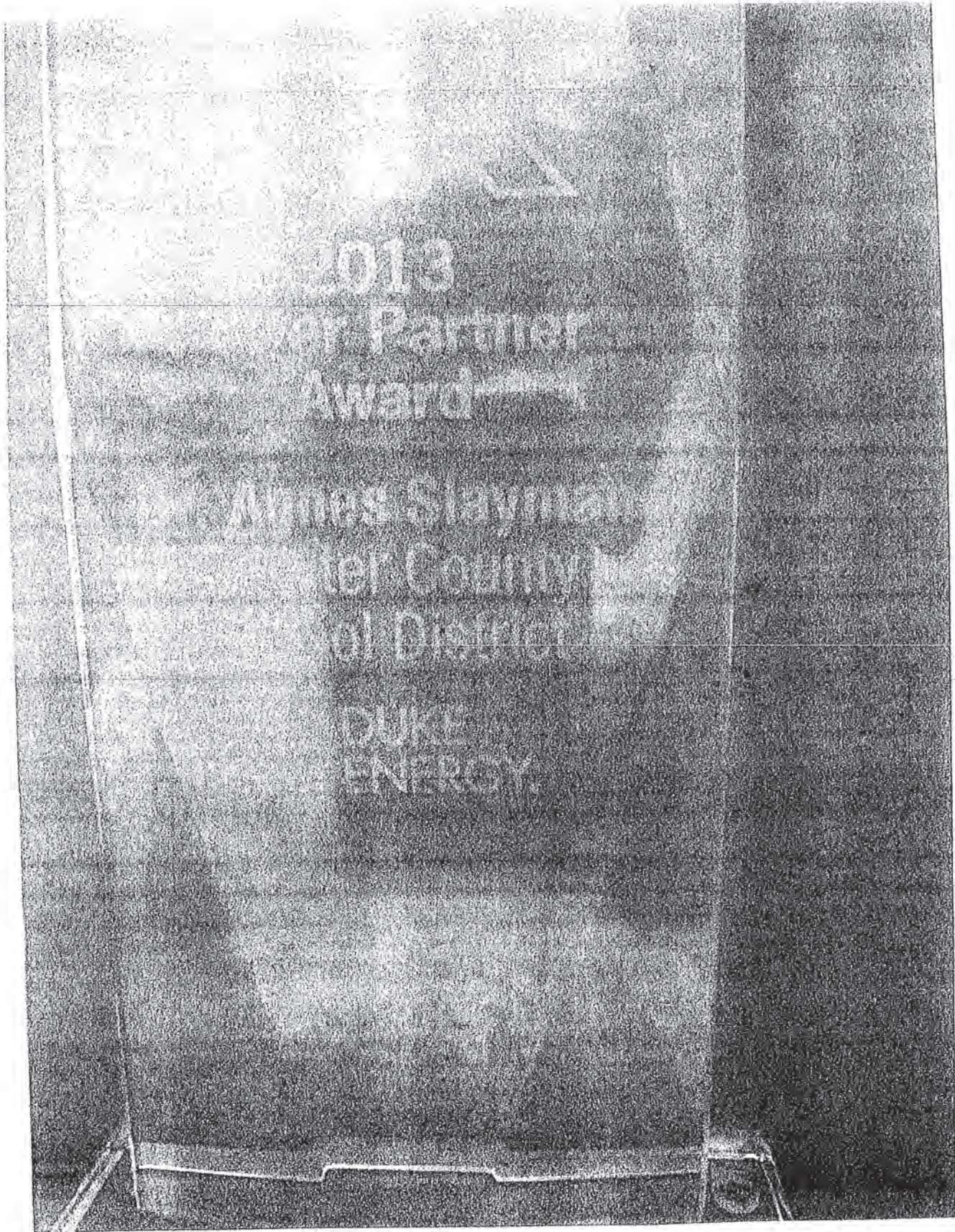


PRESENTED TO
DR. AGNES SLAYMAN

"IF YOUR ACTIONS INSPIRE PEOPLE TO DREAM MORE,
LEARN MORE, DO MORE AND BECOME MORE,
YOU ARE A LEADER."

----JOHN QUINCY ADAMS

LEWISVILLE HIGH SCHOOL ARMY JROTC
MARCH 10, 2012



1657

1804



Outstanding School Superintendent
Presented to

DR. AGNES SLAYMAN

For Active Support, Professional
Concern and Leadership
For Career Technology Education

*Career & Technology Education
Administrators' Division
South Carolina Association
of School Administration*

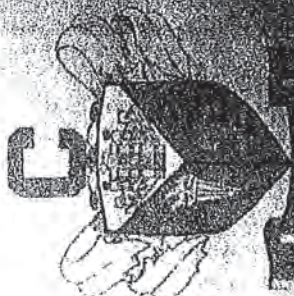
2013

Certificate of Appreciation

In honor of your outstanding contribution to the University of North Carolina
we proudly present this certificate of appreciation.

Dr. Johnnie M. ...

for her dedication and excellent service to the
students of the University of North Carolina.



Chancellor

Johnnie M. ...
Student Body President

Student Council Advisor

Johnnie M. ...
Student Council Assistant Advisor

CHESTER CYCLONE BATTALION

CERTIFICATE OF APPRECIATION

PRESENTED TO

DR. AGNES SLAYMAN

28 MARCH 2013

In recognition for your outstanding support to Chester Senior High School JROTC. Your time, cooperation, and efforts greatly contributed to the overall success of the Cyclone Battalion's 2012 -2013 School Year. This support reflects great credit upon you, and your dedication to our organization.



Boyd Joye

Boyd Joye
LTC, US Army, (Retired)
Senior Army Instructor



James Banks

James Banks
MSG, US Army, (Retired)
Army Instructor

www.onlinechester.com

The NEWS & REPORTER

A Slayman Timeline

By Brian Garner

Tuesday, September 29, 2015 at 11:14 pm (Updated: September 30, 8:41 am)

Dr. Agnes Slayman became Chester County School Superintendent in 2012. Since that time she has brought national and international recognition to the Chester County School District and its programs. Here are some of the school and district accomplishments during that tenure:

2012

Work begins on new district administration offices

Seven county schools earn Palmetto Gold or Silver Awards

A decision is reached in the Mitford district case; Fairfield County is ordered to pay Chester County over \$1 million for the cost of educating students from the Mitford area

School district Facebook page initiated

Lewisville High receives 100 on Federal Report Cards

The weekly High Fives celebrating school students, faculty and staff successes, are begun

Great Falls Elementary School is named a Microsoft Pathfinder School

School district begins Grow Your Own Leaders program

GFES principal and teacher attend Microsoft Global Forum in Prague, Czech Republic

In the wake of the Sandy Hook Elementary school shootings, the CCSD moves to improve security

2013

CCSD creates Mentor Me program

Three county schools earn Palmetto Gold or Silver Awards

CCSD named a Microsoft Partner district – the first in the southeast, only one in the state and one of 12 in the nation

hiTEC 1:1 initiative begins; tablets distributed to students in three high schools

CCSD receives AdvancED accreditation

School of Inquiry gets first place in Dick & Tunky Riley WhatWorksSC Award

Slayman arranges with TruVista and Comporium to provide free wi-fi hotspots around county for students

2014

The school district took their first steps onto the world stage as they began the groundwork to be part of the EnVision S.C. World Class Scholars program.

CCSD demoed their telemedicine program, allowing Chester physician Dr. Sam Stone to make "virtual housecalls" with students at Chester Park Elementary. Some of the people who helped fund the program were the Upper Midlands Rural Health Network and supported by the Chester Healthcare Foundation.

Four county schools win Palmetto Gold or Silver Awards.

Great Falls Elementary teacher Rachel McAbee and principal Wendell Sumter were invited to attend the Microsoft Global Forum in Barcelona, Spain.

GFES named a Microsoft Showcase School.

The school district rolled out their hiTEC (Helping to Integrate Technology Education and Careers) tablet deployment for all three high schools. Students went through a day of deployment as the tablets were handed out and they were taught how to use them.

The schools of Great Falls High and Lewisville High School were nationally ranked in 2014 in a US News & World Report ranking. Both Great Falls High and Lewisville High received national-level Bronze rankings at Best High Schools by the news magazine.

The Chester County School District's hiTEC initiative was the topic of the latest post on the Microsoft in Education blog.

CCSD is the subject of a documentary video commissioned by Microsoft to showcase the district's successes using technology in learning. The film team would be in the district that November, school board members were told.

In addition to the documentary, Microsoft invites Dr. Slayman to attend the Microsoft Global Forum in Miami in November.

In November, Maria Potenza, a Senior Product Manager for Microsoft in Education and a film crew spent a week in Chester County.

Close on the heels of the Microsoft documentary being filmed, Superintendent Dr. Agnes Slayman became one of over 100 educators invited to the White House for the ConnectED to the Future Summit and asked to sign a pledge along with President Obama, for the ConnectED Initiative, "a convening of superintendents and other educators from across the county who will lead their school and districts in the transition to digital learning.

Dr. Slayman would be one of eight superintendents who would be highlighted nationally as a participant in the ConnectED summit.

2015

CCSD introduces a district app

Microsoft Director of Educational Leadership visits school district

GFES Principal Wendell Sumter featured in Microsoft blog

CCSD, Giti Tire establish GITI Math & Science Award

EnVision World Class Scholars program underway in several schools in district

COLT becomes STEAM school

Robotics program begun at Lewisville Middle

COLT has first Appy Hour education app showcase

CCSD moves to get more security officers on more school campuses

CCSD contracts with Defender Security to provide security services

CCSD facility study architects selected

District starts 3-D printer training and programs; 3-d printer is purchased for every school

hiTEC initiative moves into lower grades; grades 4-8 receive tablets

CCSD partners with York Tech, Apprenticeship Carolina, local businesses for Youth

Apprenticeship program

District SAT scores come in better than state average



Office of the Press Secretary

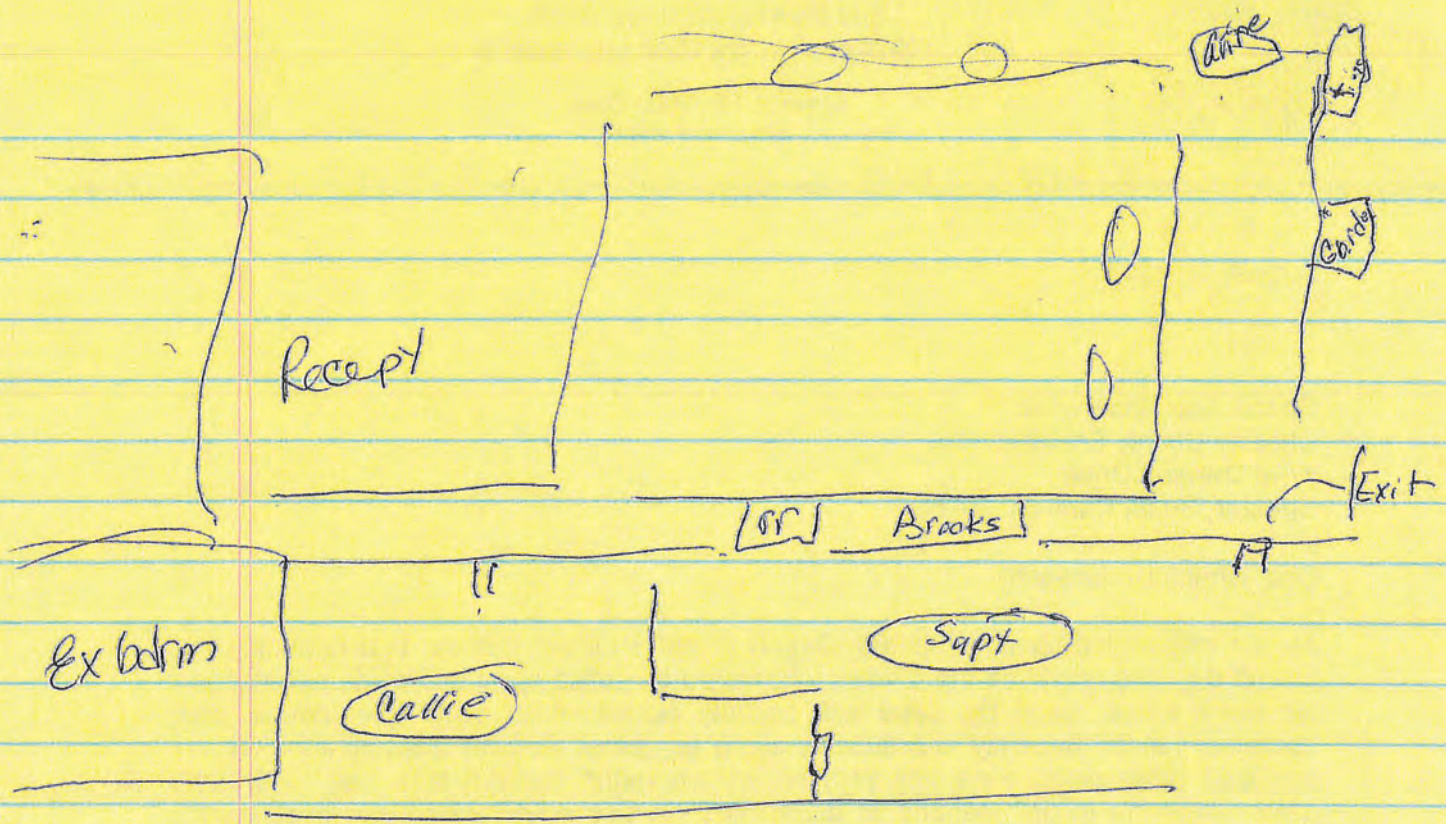
FOR IMMEDIATE RELEASE
November 14, 2014

White House to Host ConnectED to the Future Event

WASHINGTON, DC – On Wednesday, November 19, President Obama will host “ConnectED to the Future,” a convening with superintendents, and other educators from across the country, who will lead their schools and districts in the transition to digital learning. The event builds on the momentum of the ConnectED Initiative, a plan the President announced in 2013, to connect 99% of students to high speed internet and empower teachers with the technology they need to transform teaching and learning. An important part of this initiative is ensuring that digital connectivity supports innovation in America’s classrooms. That is why, this fall, the Administration launched the Future Ready Pledge to help school districts develop a culture where teachers harness the power of technology to personalize learning and provide quality digital content that fosters student inquiry and creativity. Through this pledge, superintendents from across the country are committing to lead a transition in their districts to innovative teaching using technology. Signatories will also work in partnership to share best practices with other school districts. During the event, President Obama will host a digital pledge signing ceremony with over one hundred superintendents to be joined virtually by hundreds more across the country.

Since the President’s call to action in support of the ConnectED Initiative, more than \$4 billion in public and private funding has been committed toward expanding high-speed Internet connectivity for America’s schools and libraries. Additional details about the conference will be released at a later date.

Ex 26



PENGAD 800-631-5883
RESPONDENT'S EXHIBIT
 26
 11/1/18 Slayman
 CE



THE SCHOOL DISTRICT OF CHESTER COUNTY
509 DISTRICT OFFICE DRIVE
CHESTER, SOUTH CAROLINA 29706

10

Agnes M. Slayman, Ph.D.
Superintendent

August 18, 2015

Sheriff Alex Underwood
Chester County Sheriff's Office
2740 Dawson Drive
Chester, South Carolina 29706

Dear Sheriff Underwood:

As our responding agency (Chester County Sheriff's Office) it is our understanding that Sheriff deputies would be the officers who would be called upon to provide assistance if the need arises, as is the case with security alarms which occur after normal daily operation hours. Recently, our security alarm company, Security Central, informed our principals (after alarms were triggered) that 911 personnel stated to them that the Sheriff's office would no longer respond to alarm calls on any school campuses because the school district was using a security company to provide services. The security company we employ is used mainly during the school day. We are requesting clarification from you regarding the information being given to the alarm company and then our employees. Thank you in advance for your attention to this matter, it is greatly appreciated.

Sincerely,

Agnes M. Slayman, Ph.D.
Superintendent



Agnes Slayman

From: H. L. Erwin
Sent: 17 August, 2015 5:12 PM
To: Agnes Slayman
Cc: Jerry Digh

*Chester
→ Co. Sheriff's
Dept*

Security Central informed me yesterday that the police informed them that the police department does not provide security to LMS. I came to answer the alarm and the company was trying to also call the police. I'm sharing this information for you to be aware of it.

Thanks,
H.L. Erwin



14

Security

Delete Reply Reply all Forward

Mark as unread

JM

Janet Montgomery

Tue 8/18/2015 1:28 PM

To: Andre Williams;

Cc: H. L. Erwin; Jerry Digh;

August 18, 2015

Chief Williams,

On the morning of August 16, 2015, I was notified by Security Central of Statesville, North Carolina around 5:45am. that the alarm was going off at Lewisville Middle School. I informed Security Central that I would get dressed and go to the school. They (Security Central) informed me that they attempted to call the police concerning the alarm but was told that the police no longer provided security for Lewisville Middle School. I proceeded to the school to answer the alarm and check the building.

Thank you,
H. L. Erwin
Principal
Lewisville Middle School



8/18/2015

17

ID: ATRAVIS

08/18/2015 12:28

Customer Activity Report

All Activity
Lewisville Middle School
Customer ID: [REDACTED]
08/16/2015 00:00:00 Thru 08/16/2015 23:59:59
[Customer's Local Time Zone]

Lewisville Middle School [YX/6041]
(803) 789-5858

3595 Lancaster Highway
RICHBURG SC 29729

Date	Day	Time	Log Description
08/16/2015	Sun	00:39:40	Interior Burg (BA2) 'Gym Foyer Motion Detector' (System: 1 Area: 1 Zone: 29) (Alarm) RL: YX TX-ID: 6041 Key: E132 OA: 1 OZ: 29 Con: PK - Closed 00:46 Caller-ID - Not Found (803) 789-6461
		00:39:52	Contact Customer - Lewisville Middle School at Site [(803) 789-5858] - Result: Not In
		00:41:12	Contact Authority - CHESTER CITY POLICE [P] at Site [(803) 385-5433] - Result: Contacted
		00:42:28	Police - Name: 927 [Dispatched]
		00:42:37	Suspend - Time: up to 1 Minutes
		00:44:44	Contact Keyholder - HS Erwin at Home [(803) 581-6396] - Result: Left Message
		00:45:37	Contact Keyholder - Jerry Digh at Home [(803) 482-6408] - Result: Contacted
		00:46:27	Comment - NOTIFIED
		00:46:30	Close
		00:39:44	Temperature Report (DA) 'Freezer Box High Temperature' (System: 1 Area: 1 Zone: 24) (Alarm) RL: YX TX-ID: 6041 Key: E131 OA: 1 OZ: 24 Closed 00:42 Caller-ID - Not Found (803) 789-6461
		00:42:46	Close Comment - wb
		00:46:11	Customer View
		00:48:22	Comment - oper 902 advised that his sargent told him that this should be given to security and they would be happy to meet them on scene
		06:04:15	Temperature Report (DA) 'Freezer Box High Temperature' (System: 1 Area: 1 Zone: 24) (Alarm) RL: YX TX-ID: 6041 Key: E131 OA: 1 OZ: 24 Oper-Force - Closed 06:10 Caller-ID - Not Found (803) 789-6461
		06:10:22	Operator Cancel/Close Comment - WB
		06:04:18	Interior Burg (BA2) 'Kitchen Motion Detector' (System: 1 Area: 1 Zone: 28) (Alarm) RL: YX TX-ID: 6041 Key: E132 OA: 1 OZ: 28 Con: PK - Closed 06:10 Caller-ID - Not Found (803) 789-6461
		06:05:09	Contact Customer - Lewisville Middle School at Site [(803) 789-5858] - Result: Not In
		06:05:49	Contact Authority - CHESTER CITY POLICE [P] at Site [(803) 385-5433] - Result: Contacted
		06:07:31	Police - Name: 910 [Not Dispatched] Comment - ADVISED WILL NOT BE RESPONDING/SAID I NEEDED TO CALL THE SCHOOL SECURITY
		06:07:43	Contact Keyholder - HS Erwin at Home [(803) 581-6396] - Result: Contacted
		06:09:58	Comment - HS NOTIFIED
		06:10:17	Close
		07:47:49	Perimeter Burg (BA1) 'Kitchen Storage Door' (System: 1 Area: 1 Zone: 22) (Alarm) RL: YX TX-ID: 6041 Key: E131 OA: 1 OZ: 22 Con: PK - Closed 07:54 Caller-ID - Not Found (803) 789-6461
		07:48:08	Contact Customer - Lewisville Middle School at Site [(803) 789-5858] - Result: Not In



16

08/18/2015 12:28

ID: ATRAVIS

Lewisville Middle School [YX/6041]
(803) 789-5858

3595 Lancaster Highway
RICHBURG SC 29729

<u>Date</u>	<u>Day</u>	<u>Time</u>	<u>Log Description</u>
		07:48:42	Contact Authority - CHESTER CITY POLICE [P] at Site [(803) 385-5433] - Result: Contacted
		07:51:46	Police - Name: 918 [Not Dispatched] Comment - ADVISED THEY DO NOT DISPATCH FOR THIS SCHOOL ANYMORE, ADVISED WE SHOULD BE CALLING SCHOOL SECURITY
		07:51:49	Contact Keyholder - HS Erwin at Home [(803) 581-6396] - Result: Left Message
		07:52:58	Contact Keyholder - Jerry Digh at Home [(803) 482-6408] - Result: Contacted
		07:54:25	Comment - MRS DIGH TOOK MESSAGE
		07:54:27	Close
		07:47:51	Perimeter Burg (BA1) 'Cafe Hall Motion Detector' (System: 1 Area: 1 Zone: 27) (Alarm) RL: YX TX-ID: 6041 Key: B131 OA: 1 OZ: 27 Dup-Event - Closed 07:54 Caller-ID - Not Found (803) 789-6461
		07:54:33	Close Comment - WB

Agnes Slayman

11

From: Sheriff Underwood <sheriffunderwood@chesterso.com>
Sent: 18 August, 2015 7:54 PM
To: Agnes Slayman
Cc: Joanie Winters
Subject: Alarm Calls

Superintendent Slayman:

In response to your letter, the Chester County Sheriff's Office will always provide assistance to the Chester County community. The Chester County Sheriff's Office has and will continue to respond to all alarm calls that are received through our 911 Dispatch Center. To better serve the school district, we ask that a key holder be available to respond as well, during and after normal business hours.

Thank you,
Alex Underwood
Sheriff
Chester County Sheriff's Office
2740 Dawson Drive
Chester, S.C. 29706
phone: (803) 581-5131
fax: (803) 581-5552
sheriffunderwood@chesterso.com

I

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1817



CHS

12

On August 18th I received a call from the alarm company about 2:30AM. The alarm company informed me that we had an alarm coming from the kitchen area. They informed me that they had dispatched the police. About 30 minutes later the company called again and said the city of Chester police would not respond. I informed the company that we were in the county. They said they would make that call. In about 30 minutes the alarm company said the sheriff office would not respond to school alarms, because the school district had their own security company to take care of those calls. I thank them for efforts and hung up.



September 8, 2015

Denise Lawson, Board Chair
905 Lingle Lane
Chester, SC 29706

Dear Mrs. Lawson,

We are formally filing an official grievance due to a hostile work environment, implications of ethical violations, and racial and threatening remarks by Dr. Agnes Slayman, Superintendent of the Chester County School District.

We are requesting a closed door meeting of the Board as a group to present our concerns to the Board of Trustees. We respectfully request that Dr. Slayman not be in attendance during this meeting.

Sincerely,

Dr. Charles King, Associate Superintendent of Instruction



Mr. Jeff Gardner, Associate Superintendent of Operations



Ms. Shawn Williams, Executive Director of Human Resources



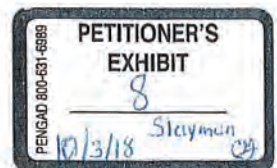
Mrs. Anna Stroud, Executive Director of Finance



Mrs. Brooke Clinton, Public Information Officer



Cc: Allison Hanna, Attorney



From: Brooke Clinton
To: Griggs, Joel
Subject: Clinton information
Date: Friday, January 08, 2016 1:58:19 PM

Dear Mr. Griggs,

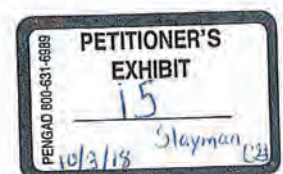
Our HR Director Shawn Williams asked that I contact you with my name and information related to the Slayman situation. I would be more than happy to talk with you if needed.

I never typed any "official notes" but rather hand-wrote information for Mrs. Bagley, which she should have in her possession. Before the Bagley investigation, senior staff shared very little with each other regarding specific information Dr. Slayman shared with us individually. After the investigation began, I learned just how often I had been lied to or manipulated by Dr. Slayman for her own gain or purpose. Even the night she was first put on leave she called me at home and demanded to know who had filed the original "hostile work environment" complaint and instructed me NOT to reveal she had discussed personnel issues with me. The entire experience has been highly stressful and has made me very, very sad. I am a graduate of our district and was so proud to serve as the Public Information Officer. The horrible press has been a professional nightmare and an embarrassment to us all. I take this situation seriously. I have NO desire to retaliate against Dr. Slayman but do know that my top loyalties lie with the district. My young children are students here and I strongly believe in our mission. I know we have wonderful teachers and talented students and I am more than ready to re-shift the focus to THEM!

I am at your disposal!

Brooke

Brooke Clinton, Public Information Officer
Chester County School District
Office: 803-581-9563
Cell: 803-374-6022
Home: 803-684-9320
Personal cell: 80-209-2143



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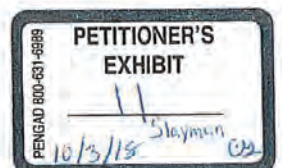
Enter
Total Pages

Dr. Slayman is a not-a nice person. She is selfish, vindictive, and cruel. In short, she is a bully.

She is a paranoid individual who allows her fear to rule her actions without any concern for the people she negatively impacts. She has turned against many & has begun to slander them.

She has allowed her infatuation with Dr. Knox to justify her actions which are detrimental to the district and hurtful to individuals. She has chosen her membership in her "Breakfast Club" with her "Political Advisors" over doing what is best for the children of the District.

While Dr. Slayman is very smart and has very good ideas, she strives to implement her initiatives



mislead the Board regarding the
framing of his ideas.

Alienated:

1. Dr Sam + Athletic Trainers.

• Brought in Moore Clinic +

• Hired 3 trainers

• Cost increase FY15 = 75,000 - to 103,866 = 28,866

2. County Supervisor

• Will not communicate w/ Shane

• Response to letter to enter into MOA

Build new field - potential cost \$500k

• Cancelled scheduled events at County Facility
+ moved to Pine Station

• Sends communication to whom it may concern

• Accuses him of working against District
in presence of others

• Refers to him as "special"

3. Sher. H.

• Ended more than 15 yr arrangement to
provide SRD's - cost → increase in FY 16 - \$239,451

• A7th school 24,271 39,192

• SRD 9,428

• CHS SRD 27,690

• 1st Tr. M. 1120

261,426

LOST

DARE

PI DARE

The security issue. When she makes a decision that
 was NEVER about the things she will put her
 safety of students + staff. the Sheriff. she is giddy. You can
 always cement her position how she deligitates being
 in the break room club. +
 with Dr. Knox.

- Told Principals they would all receive an officer.
- Told Board, security personnel could carry guns + arrest (w/ handcuffs) when presented in Spring but received letter in Nov from CH stating no arrest powers.
- Refused to allow access to cameras
- Refused to allow Sheriff's Dept to provide active shooter + other safety training - \$6,000-
- Publicly accused Sheriff of working slander against her District - architects, attorney
- Would not give me a copy of the contract with Defendu. Stated she was holding it close because, "I am at war with the Sheriff."
- Argued that the contract was not public information.
- Told the Board security officers had been hired when stand-ins were present for meet/greet
- Truista communications after they

members asked questions that put a bad light on Detroit, and she became angry with Rotary Club.

- She is the Red Queen in "Alice in Wonderland" - all some one disagrees with her, its "OFF WITH THEIR HEAD!!!"

- Mike Jamnik who heads up the Old English Consortium disagreed with Dr. Eagan about his being present at a meeting. After this disagreement, she has tried to cut out the Districts memberships and participation in the OEC. This organization provides staff the opportunity to collaborate with surrounding Districts, grant writing services, numerous hours for professional development for administrators and teachers, and is responsible for the Academic Challenge + Junior Scholars Program.

Inappropriate

- Larry King Live - \$27,900
- Additional costs for Board member to travel when on trip to Washington DC - BM was on personal business.
- Told Jeannie Ligon to write letter to Linda Falai fixing history of a student
- Dismissed District business w/ "Breakfast Club" / "Political Advisors".

- Terry Tinker told sister Karen Kern about security firm at Sunday lunch before Board authorized Dr. Slayman to enter into agreement

- Screamed at staff frequently

- Threatened staff

- "I will cut your throat."

- "I will cut your legs off."

- "Do not make facial gestures in Board Meetings"

- "If I catch you talking to the Board."

- Told Board we were having a salary study at a cost of \$11.00 per student. It was actually a cost comparison. She, Mr. G. + Dr. K.

- It was not authorized. There was no trade-

a treatment of cabinet is degrading + impacts job for many a negative manner.

- Directed Ms McConnell to search the building for us.
- When angry with a member of cabinet, she would by pass them + go to subordinates requesting info. Often cabinet member had to "fix" issues which resulted.
- Would make staff feel bad for taking leave:
 - Brooke - FMLA
 - Charles - Death - Brother, Nephew, Sister-in-Law
 - Jeff - Neck injuries / needs surgery would not take leave.
 - Me
- Attending meetings O&D / Conferences afraid to go or would require staff to return without ^{allowing time to} attending session
- Told me I was "too transparent" by providing school allocation breakdowns. - Greg
- Directed me to remove salary \$50K + from website because "it is causing me problems." Double talk for Dr. Knoy is mad because Mr. Tiller is being pd more than him.
- 2 the records - husband +

- Anyone who made her angry or disagreed with her would be "cut off" & mistreated.
- Conducts meetings/makes decisions w/out input from cabinet members in the area
 - Does not include Shau in Personnel issues
 - Does not include Jeff in safety, security
 - Does not include Brooke on PR
 - Does not include on Financial
- Mislead Board about the way to hold a Bond Referendum to maintain debt service. However, this is not accurate. - Not sure who she was getting advice from.
- Has told us that the Board goes along with everything that she says & did not want to upset them because she had them in a "spook place".

Disregards
opinions &
suggestions
of others.
Dan Dr. knows
his opinion is
not heard.

• She tries to conduct the business that should be delegated to cabinet & she crosses the boundaries because she is not fully aware of regulations.

me

- Would meet ^{above} with the Board & discuss budget, when Board "did not know" something, she would blame me & state she had not been told.
- On at least two occasions, went to the Board with information from LHS principal Dr. Knox, about me without getting info. from me. Information from Dr. Knox was not truthful. Dr. Slayman
 - Pupil Activity
 - Annual school Allocations
- She has damaged my reputation with the Board by discrediting me and Chairing the Faldy.
 - Had Dr. Littlefield investigate me.
 - I felt as though I were being accused of stealing. Did not know if I would be fired, demoted, prosecuted, have a pay cut.
 - Dr. Littlefield presented to Board in Executive Session. I was never informed.
 - When I contacted audit firm because of the way I was being treated by Senior Partner & then told Superintendent I did so because I would not know I was accused of

- I have been left out of discussions involving financial decisions.
- I have been excluded from meetings.
- I have been demeaned, my advice has been dismissed or I have been talked down.
- I have been told the Board did not want to raise my pay because I do not hold a 4yr degree although I have been performing the job since 2008, have had excellent evaluations, flawless audits, was instrumental in identifying issues in FY 2009 that indicated financial problems on the horizon which enabled District to make cuts + prepare for recession.
 - Durlough ^{during} deepest period of financial crisis
 - Teachers + all other employees - 1 day
 - Principals + administrators - 2 days
- Sharon + I were promised in July 2013 that she and I would have our pay moved to the mid-point on Band 06 once the audit was presented "if the audit was good."

5-11-11 11:11:11 11-11-11

have been @ 82,156.92 was
paid 76,464.21 - Difference FY 14-
15 - @ 5692.71

- FY 15-16 - 2% raise - salary
would have been @ 83,800.00,
being pd @ 77,993. - Difference FY 15-
16 - @ 5807.06.

• FY 13-14 @ 5526.90

FY 14-15 @ 5692.71

FY 15-16 @ 5807.06

\$17,026.67

]} \$11,219.61 LOST
x2
shown + me
Totals
\$22,439.22

- was told if I obtained SCASBO
certification, she could justify
raising my pay. Certification obtained
in Nov 2014.

- Have been told by cabinet that:

- I am being targeted by Dr. Skayman

- She has called me a spy for the
sheriff

- She does not trust me

- She plans to reorganize Department
and bring in a CFO over me.

- After each Board meeting, I actually
in not heard "Dr. I shall have a

- I have fibromyalgia. When my symptoms began & the fatigue & aches/pains caused me to miss work, she continually treated me as though I were lying about not feeling well. She has told me that she would bring someone in from another District to replace me and they would be able to do the job immediately.
- When I take leave (SL, VAC, Personal, PD) I normally work additional hours on weekends or after hours to ensure the job is done and still have my leave docketed. It is normal for me to work 50 hrs or more per week.
- I have discussed the ^{work} issues with my doctor at each visit. Since Dr. Stagner began w/ the District, I have seen my personal physician at least a dozen times over the last 2 1/2 years. During the conversations I

stress of an experience at work increases the FM symptoms.

- I have my flaws! I may not be the best employee, but I am loyal. I have constantly been supportive of Dr. Gagnon. I have not spoken publicly opposing her. I do not participate in the petty conversations where people have attacked her appearance or any other personal issues.
- I have advised her to the best of my ability giving true and honest insight which is most likely the root of her actions against me.
- She accused me of providing inaccurate information.
- I believe I have a legal case against her.
- I do not want to be involved in this.

the District financially liable.
I believe that if she is allowed
to continue to behave in this
manner, she will cause some-
one to react violently.

Anna B. Stroud
Executive Director of Finance

- Possession and possible destruction of Federally protected medical information
 - After Dr. Slayman became superintendent, I began having to be out sick. Prior to that I rarely missed work due to me not feeling well, but I was always exhausted and was experiencing extreme pain in my muscles even though I was not doing anything that would cause the muscle pain. I was also having frequent inner ear infections with severe vertigo type symptoms which made coming to work impossible. I thought the exhaustion was due to me working long nights and many weekends which I had been doing consistently for at least two years when Dr. Slayman came to Chester and continue to do. I visited my GP several times for the exhaustion and each time I had the vertigo symptoms and brought medical excuses. Dr. Slayman became increasingly angry each time I had to be out. She made me feel like I was lying about being sick.
 - During my office visits with my GP, I would be in tears because I felt like I was going to lose my job based on Dr. Slayman's comments and actions when I had to be out. My GP decided my weeping, exhaustion and unexplained pain were symptoms of depression and attempted to give me anti-depressants. I did not take them because I did not believe I was depressed and thought it was the stress. This prolonged the eventual diagnosis of Fibromyalgia which came in the fall of 2013. I shared this information with Dr. Slayman shortly after being diagnosed.
 - Since I was never out of work for more than a couple of days at a time and would normally still work late hours and weekends well exceeding my required 37.5 hours, I did not realize that I should have my doctor complete FMLA paperwork. Shawn advised me to have my doctor complete the forms to document my condition and need for intermittent time off after going to her office because of the way Dr. Slayman was treating me.
 - I had my Rheumatologist complete the necessary forms which were returned to me. I gave the forms to our Benefits Coordinator, Deloris Jackson. I recently learned last week that Dr. Slayman took the paperwork from Shawn shortly after I gave it to Deloris.
 - Brooke Clinton told me that one morning when I did not attend a Cabinet meeting that she asked where I was and Dr. Slayman made a disparaging remark. Brooke reminded her that I had a documented medical condition. Brooke told me that Dr. Slayman then told her that I did not have any paperwork in my file.
 - For Dr. Slayman to have my medical information and to discuss it is illegal. Further, because of the way she has acted towards me and for her to say it did not exist, I believe her taking the paperwork is another example of her targeting me.
- Witnesses
 - Shawn Williams, Executive Director of HR, Deloris Jackson, Benefits Coordinator, and Brooke Clinton, Public Information Officer
- Evidence
 - Emails from Deloris Jackson

Re: FMLA Form - Anna Stroud

Page 1 of 2

Re: FMLA Form

Anna Stroud

Wed 9/16/2015 3:55 PM

To: Deloris Jackson <DJackson@chester.k12.sc.us>

Thank you.

Anna

Anna B. Stroud
Executive Director of Finance
Chester County School District
509 District Office Drive
Chester, SC 29706
(803) 581-9524
(803) 581-2536 fax

Be the change you wish to see in the world. Gandhi

From: Deloris Jackson
Sent: Wednesday, September 16, 2015 2:11 PM
To: Anna Stroud
Subject: RE: FMLA Form

Anna,
Shawn kept your FMLA paperwork when *gave it to her to sign. I think she gave it to Ms. Slayman, not sure. I don't know where it is.*

From: Anna Stroud
Sent: Wednesday, September 16, 2015 11:02 AM
To: Deloris Jackson <DJackson@chester.k12.sc.us>
Subject: FMLA Form

Deloris,

Could you give me a copy of my FMLA form that I turned in last year, please? I understand that I have to update this annually and need to verify the date it was last completed so that I can make sure to have my doctor complete a new one. Also, I will need a blank form,

<https://outlook.office.com/owa/>

9/19/2015

Re: FMLA Form - Anna Stroud

Page 2 of 2

I apologize for asking, but I have not been able to locate the copy I kept.

Thank you,

Anna

Anna B. Stroud
Executive Director of Finance
Chester County School District
509 District Office Drive
Chester, SC 29706
(803) 581-9524
(803) 581-2536 fax

Be the change you wish to see in the world. Gandhi

Security

- ❖ Endangered students by:
 - Not allowing officers to train inside the buildings.
 - Not permitting the officers to have access to the security cameras.
 - Not allowing the officers to have blueprints of the buildings. (only Great Falls)
 - Not providing keys to the officers.
 - Evidenced by School Resource Officers.

- ❖ Gave the Chief the job before any interviews were held. Advertised the position at \$38,000, negotiated to \$39,000, which ended up at \$62,000.
 - Evidenced by Human Resource Director, witness and payroll

- ❖ Asked me to lie to the board about what we were going to do (hire security group). Said if it goes before the board, tell them it's a motion to approve crisis management. So we can get county money before Shane Stuart knows what we are up to.
 - Evidence based on notes taken that day during conversation.

- ❖ Attempted to use Influence to block Giti tire contract with American Security.
 - Evidence based on notes taken that day during conversation.

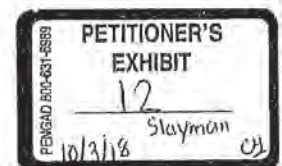
- ❖ Asked me to withhold from the board that Defender did not administer first aid or CPR.
 - Evidence from notes taken the day of conversation.

- ❖ Instructed Chief Williams to hire an officer who had been fired from the Highway Patrol because of favors to a legislator.
 - Evidenced by myself and Chief Andre' Williams the day of the conversation.

- ❖ SLED (Wayne Freeman) expressed concern that deputies were not included in training. Board asked if we were training together. We were not training together, but she told the board we were.
 - Evidenced by attending work place meeting.

- ❖ Lied to the board and told them each Defender officer was permanent.
 - Evidenced by myself and conversation was witnessed by Brooke Clinton.

- ❖ Will not allow finance or anyone else to see the final Defender contract.
 - Evidenced by myself, Anna Stroud and Greg McDow.



- ❖ Instructed me to hire a white officer after a black officer was in place because the administration team was black and the population was white
 - Evidenced by notes taken the day of conversation.
- ❖ Racial comment- Town in Idaho is 95% white. Where are they? Who? The black people, 95% white, heaven man heaven.
 - Evidenced by notes taken the day of the conversation.

Other

- ❖ Stated that she would "rip Rickey Campbell's throat out" and "I swear I'll kill him"
 - Evidenced by notes taken at the time of the incident.
- ❖ Immediately after the board meeting she stated that "SOB had better not have made a deal without the rest of the board." Also, on two different occasions, she stated that "I'm going to kill Rick Hughes."
 - Evidenced by notes from the conversation.
- ❖ She stated that "I will kill him" referring to Danny Scruggs. She told Dr. Charles King to go "Rip his throat out."
 - Evidenced by notes, Dr. Charles King and Chief Andre' Williams.

The board was concerned about the district safety training that the sheriff department and first responders training not being coordinated so that we all worked together.

The first meeting with the Sheriff and the principals did not go so well. He was aggravated with some of the questions asked and was short with his answers.

Shortly after the Sheriff requested to do active shooter training scenarios in the schools and wanted blueprints of schools. As told to me, put him off.

Mr. Iraks at CMS had his window open and stepped thru it to go to his car. The SRO was there and stepped back in thru the window. The sheriff put the incident in an article that was in the Chester paper.

After that, AS set out to get him out of the schools. CK and I urged her to go talk to him, but she refused. The sheriff sent word by his officers that he wanted to patch things up. She still refused.

11/13/14

Called into her office and told there was going to be a workplace violence training at 10:00 and 2:00. Said that Carlisle told her about it. Said we would go together or I would go to one and she would go to the other. I said I would go to the 10:00. I attended. Sheriff and Officer Sprouse put on the training. They emphasized the need to train in buildings they may have to respond to. They mentioned ATL. Training was very similar to Wayne Freemans and Threat Suppression. After the training Sheriff shook my hand and said "we need to mend fences over there, I called her 2 weeks ago and she has not called me back." When I returned she asked if the training was similar to what we were doing and I said yes. She said "good, now I can tell the board our trainings mesh." I was sent as an unknowing spy to bolster her notion to use security service over the Sheriff's Department. I felt I had been betrayed. She did not attend the 2:00 session. This is not what the board meant. Our trainings don't mesh and we have no ideas what will happen in a crisis.

11/17/14

Told to give bullet points on using a security service. Gave points which she said she would discuss in the closed session. She has not told me how these people will be used.

We installed around 600 security cameras in the schools and she would not let the officers look at footage.

Numerous times said she was going to cut the Sheriff's throat.

Went after his "supposed" girlfriend.

We had active shooter training by Wayne Freeman from SLED. He told AS that he had trained some of the deputies to be trainers. AS told me to tell him no, it had to be him.

Wayne brought a couple of deputies with him to the GF training.

After that, AS said find a private security agency. We hired, Threat Suppression. Can't remember the cost, around 1000-1400 per training.

We first met with American Securities. AS spoke poorly of the sheriff, how he tried to make us look bad. American Securities mentioned that the relationship needed to be patched up. AS said no, it's beyond that point. After that meeting they would not return our phone calls.

AS said Maggie James was friends with the Sheriff and that we would have to keep what we wanted to do from her or she would tell the sheriff and the county might not fund us. Asked me numerous times if we could get around the RFP and board approval. I asked Anna several times and each time she said it did not have to go thru a RFP but it should go before the board because it was so much money. AS then asked me to lie to the board.

All districts that I checked recommended a blend of SRO's and security. AS instead no deputies in the schools.

When interviewed for a chief of security. AS gave us many indications she wanted Andre' Williams. Then she would say "it's up to you" We knew we had to pick Andre'. The salary was advertised at 38k. She had Shawn up it to \$62,000 so he would take home 39, 000. AS will not give the final contract to accounting.

Daily- we never know when we will be called in for some suspicion of telling someone something. It's not unusual for her to spend 2 or more hours going over scenarios of who did what or who said what or how we can "fix" something. She will sit in her office and yell "Jeff" "Jeff!" Others in the office in think it's funny, I'm totally wrecked by it because I don't know if she's going to go off on me or have me call someone or what.

She will leave us out of important meeting and then give us directives. Then if a principals question the decision, ask Jeff why did you change the facilities use form? (Because you told me to.) I didn't know it was because she was mad at the YMCA director. Over and over this type of thing happened and has totally wrecked me. I cannot do my job because of the constant interference and paranoid behavior.

We have to endure it or we know we will be moved or let go.

Anyone would consider it intimidating.

Calls people Idiots, Jerks.

Ridicules us in public, especially Charles.

Shawn did not receive her raise because AS was targeting Anna.

We have no process we can avail for grievances. She coerces information from everyone.

Torpedoed Lee Green job opportunity.

Called Superintendent where Betty Jones Geddings went and told her she was toxic, after she was let out of her contract.

AS made Charles and I interrogate cheerleaders about Kim Sanders having an affair with Sheriff Underwood. Keeps asking for out notes to use against him.

Witness to senior staff for threatening Physical harm, shooting, cut our throats.

Leave out finance and HR in all major decisions.

Intimidated Brooke to the point of her not taking FMLA.

Calls us we have 5 minutes to respond 24-7.

Jeannette says she have never been so intimidated as when she tries to say Jeannette tried to incite a riot.

Gov called a state of emergency at 6:05 called off school and when we came in she would not speak to us.

She still meets with Bill Stringfellow.

Stroman went to Washington.

Denise to Idaho.

Duane Graham is concerned is being a target. Wrote him up for writing a letter to support a church member.

Cur out throats, kill you, cut the knees out from under you.

Threatening principals, I'll shoot you.

Allison Hannah, Rick Jiran, Sam Stone, Rotary, United Way, Hazel Pittman, Boy Scouts, Girl Scouts, YMCA, OEC, Sheriff, Comporium, County- Anyone, County Supervisor and the Herald quit all communication with the above.

Salary study- said that Anna and Shawn did not do their job. He did a salary study. Did not do a salary study. It's a comparison where she hand plcs each salary. She has promised Shawn a promotion and will not do it because of Anna.

AS did not investigate a sexual allegation and wrote the person up who reported it.

\$30,000 to create a promotional video for Microsoft.

Robin Taylor asked why did we supplement our officers with security? she started talking about demoting her.

Phone calls to Maggie, Denise are inflammatory gossip lies who said what/

Met on instructional fair.

Treats people differently based on how they would affect her.

What are the options?

With Anna the board has been put personally at risk.

Board can be sued individually and as a sitting board over the security.

She leaves board members out and tells some stuff and others other stuff.

Spending money outside of what the board has approved.

Demands loyalty and does not give any.

Security was only established to get back at the Sheriff.

Ask others in cabinet if others agree with her moves.

Told principals, Anna and Shawn did do their jobs and that's why they didn't get a raise.

Her group thinks it's a joke when she gets sent back to us all fired up.

Calls them her legal political and cabinet advisors.

We all think that she is doing damage in the district. (Brooke)

Had Brooke drive her to an interview on her own time.

Trying her best to put everything in Lewisville. "There is nothing more I'd like to see then to close Chester down."

When we met with architects, she told them Alex and Shane would attack us. Many derogatory remarks about them. Architects said mend fences. She said "no".

When we had the tablets with the cameras. She would not let officers use them because of the Sheriff. No concern for the students.

Referred to Shane as being different to the architects. I took this to mean sexual orientation.

We now have no true traffic control. Talked about using ROTC. I recommended not.

Does not tell us when she is out or where she will is.

I retired in December with 25 1/2 years because I feared I would be fired or indicted at any time. I wanted to be sure I at least had my retirement.

AS has told an unnamed source that if she were to have trouble from the board about the sheriff she would just quit. Doesn't have to work.

I applied for a job in Cherokee as Associate Superintendent for Operations. I told Slayman from the beginning what I was doing. I told her it was more money, which it was, between 8-15,000 more a year. The interview went very well and I was called by the district and told I was a finalist. The HR director called and said the superintendent would like for you to come meet with her Tuesday at 5pm. Can you do that? I said yes. I told AS about that also. She said "fine. Go ahead, I already have someone to replace you." Soon after Brooke came to me upset and said she had heard AS talking to the Superintendent Moore and that she sunk me. I called Cherokee and told them I was withdrawing my name because of the long drive. I did not ask Brooke what she had said. I was devastated. She shut me out of meeting and did not talk to me for 2 weeks.

In board meeting we were told not to make any facial expressions or to look at the board when we are seated.

09/25/14

Dwayne called to set up dated for training. Wants to know if we can use Sprouse or Poole? I asked if ATL should be included since its out kids there also? "No they get their training thru Underwood. We don't need those women there. Later I talked to Jeanine Ligon and she said we were setting up for a lawsuit if something happened and ATL had been left out. I again asked AS if we should invite them, "NO."

09/22/14

Are we are required by law to give EMS diagrams of our buildings? If not by law, they do not need to know. They will give that to Underwood and he'll bring a gun in or something in on a deputy dressed like a student.

01/17/14

Dwayne Robinson called and asked if the sheriff dept. could walk through the schools looking for the gas cut offs, etc. Asked for a floor plan. AS said to tell them no, we will need to look at another day. Why would they want to walk through the schools? I said in case of an emergency. She said no, there are wanting to make us look bad.

01/09/14

Dwayne Robinson requested keys for Vic Haynes or Rito Crank. AS said "keys are kept for use by SRO's. Dwayne said has Ms. Brace assigned keys to _____, he is responsible for both sets. AS says do not give key to other officers. I had to say no w/o explanation.

09/22/14

As instructed me to get Allison to tell us whether we are required by law to give the diagram of building to EMS.

08/15/14

Brought into Dr. Slayman's office and asked who could be talking to Sam Stone about his role in games said he was all worked up about it. Said it had to be Rick C and I said no he had never done something like that. Said she would "cut his throat" if she found out he did. (in parking lot as she left. "I swear I'll kill him if he did."

12/02/14

Jeannette S asked me to check on hiring a bus mechanic to school district to help his retirement. Said "Please don't let AS know. I can't take that again." She'll think we are trying to pressure her somehow.

Two bus drivers requested to see the superintendent because she told everyone at convocation they were getting a 3% raise. In fact not everyone did, including the bus drivers. The bus drivers were talking about walking off the job. After several day, AS agreed to see one. The bus driver was very cordial and AS said that she too lived paycheck to paycheck and that a salary study was being done and everyone's pay would be going up. When the driver left AS flew into a fit and said "get her over here. If she sent them you're going to have to find a new director. I swear I will kill her." I called Jeannette and she came over. AS sat down in the chair next to her and leaned over directly in front of Jeannette's face. She said "Jeanette if I find out you sent that driver over here, I'll have your job for trying to incite a riot." (Not exact quote, but something close to this.) Jeannette's face went pale and she looked at me and said "Oh, Lord NO." AS said "I will not be pushed around! Tell me exactly what you said to them!" Jeannette said she had tried to explain to them that it was a mistake.

AS continued to tell Jeanette it better not happen again. Later Jeanette called me and kept

saying Oh my Lord, oh my Lord she's not going to fire me is she? I have never been spoken to like that before in my life! Jeanette request that I meet her at the transportation office now and she will only come over here when she is summoned. She often starts our conversations with "Are you alright?" AS blamed her remark about the 3% raise on Brooke Clinton because Brooke help wright her speech.

In the case of the parent CK was dealing with, AS said that this was a case where the child would be justified to commit patricide.

I found out the practice field was built incorrectly, batters have the sun in their eyes. She said get the architect to give us a proposal to fix it. The architect gave the proposal in executive session. The cost could be up to \$300k more or less depending on which proposal we look at. Rick Hughes said he had a problem with spending that kind of money on a field at a middle school when we were planning to build a new high school and we had a great field to play on anyway. After that meeting AS looked at me and said that SOB, I'm going to kill Rick Hughes.

09/23/14

"Call Grazler Rhea. Board said they are not interested in selling any property. I said we're not selling it, we're giving them an easement so they can clean that ditch out and help the neighborhood. "Have you been over there?" Those people don't care about that drainage. It's a slum man. They are up to something. Tell her the board has indicated they are not interested in selling any property. They might give permission to clean the ditch, but if we sell the property there is talk of building apartments where the old mill was and that is what this is all about. "And they might build something on the property we sell them and we won't be able to cross it." I have explained that they can't build on it or bar us from it. I had clocked 19 hours in to this project before the executive session.

07/09/14

During conversation with Willford (A parent about baseball), he made the accusation that transcripts had been changed at CHS. She said that she would fire every principal, teacher, assistants, etc. Then looked at me and said that would have happened when you were there. I said no. Williford said no, Mr. Gardner was never a problem. She asked would that have happened for the last several years. He again said not. So are you saying you didn't hear this when Gardner was there. No. She looked at me and said if he did I'll fire you and your assistants, guidance and teachers.

12/01/14

During cabinet meeting w/ CK, AS, Anna, Brooke, SW, Me, Brooke brought up a school that had a full run through active shooter and reunification training. She said that all first responders had

practiced in the buildings and knew the layout by heart. AS then told the group that I had attended a training meeting (work-place safety) and that the Sheriff had called me out. I told everyone that the sheriff office had talked about being able to work with the charter school and that the others in the room did not realize that he was not talking about the district schools. She said she was going to the council meeting tonight because the Sheriff was speaking and she wanted to see what he was going to say.

1/16/15

AS brought CK, NR and JG in her office. Discussion was one for one k-12. NR told AS that he would need more people. He also said he needed to move some up to tech 2. He said they would need better pay. AS said tell them we're doing a salary study. NR said they've heard that before, for the last 3 years. AS said I can't do everything at once. AS said that she would tell us something but if told anyone she would "kill us". She said the district would be debt free in 2016. The district would be rich. Talked with her about revamping Lewisville Café.

1/21/15

During conversation with CK and myself, AS talked about Carlisle's race, Officer McCoy's computer, Sheriff and Anna. While talking about Carlisle she told us she would kill you if we told anyone. Can't remember why the remark was said.

01/23/15

James Britton was brought in at 9:30 am to discuss his credentials work experience, etc. AS told him he made her feel "very comfortable" He questioned out RFQ for A/E services. I told hi, about Littlefield and gave him his work until now, as AS.

08/17/15

As I went into our 4:00 meeting seated were Charles, Shawn and Dena. Before I was in AS sight she said loudly to the others, "no, I have a Tressa and Jeff issues" Her issue with me was that a parent asked her to call them about an attendance issue. Mr. Grimm lived in Chester but his son stayed w/his Grandmother and he wanted to talk to the superintendent. She said if I couldn't hand my departments she would give it to Charles and give me something else to do.

At CHS ...about 2 weeks after she became superintendent... fix this or I'll cut the leg out from under you. That was a stupid thing to do.

Kim Sanders – not a Chester County School District Employee, was the cheerleading coach. She was also rumored to be having an affair with the sheriff. AS got wind of this and found out that a girl, Bailey B [REDACTED], that had been staying at Kim's house had a falling out with her. (I don't know how all that came about) CK, AS and I met with the Bailey, and her mother in Slayman's

office and Salyman had her tell everything she knew about the Sheriff and Kim. AS then sent Charles and I to interview all the cheerleaders and gave us questions to ask.

Do you know of anything inappropriate going on with your coach?

Have you heard any conversations about her? Seen any activities your coach may have done you want to tell us about?

We went to CHS and questioned 7 girls. One of the girls was Khalia H [REDACTED] Kim's daughter. She broke down crying and said Bailey had been thrown off the squad and was making up rumors about her mother and the sheriff. Faith M [REDACTED] said Bailey wanted back on the team and was mad.

CK and I came back and reported to AS that Bailey had been staying with Kim at her house that she perhaps has gotten too close to her and that when she was dismissed from the squad she had said Kim was having an affair with the Sheriff. AS said go over there and fire her, pressure her and make her resign or something. CK and I were very uncomfortable with this. #1 we knew this was a vendetta against the sheriff. #2 we really had no proof. We decided we would approach her as she had lost her effectiveness to be a coach by getting too close to Bailey and causing division in the squad due to rumors of her having an affair. She denied the affair, but said she would resign because it was hurting her girls. And she didn't feel she could be effective anymore. AS asked CK and I for the notes from the meeting with the girls numerous times. We concluded she was going to use them against the sheriff so we said we could not find them.

AS called while I was making rounds and wanted to know if the person being sent to LES met the "criteria". Pat Henseley and Denise will be all over this. Pat has already called wanting to know if this was the right this to do by putting in Defender.

I called Andre' Williams, asked if we had someone to send to LES that met the criteria. He said he had talked to AS and she was ok with the officer he was sending over to LES. 10:15 met AS coming out of LHS on road flashed lights to get her to stop. She said "Have you seen the permanent security guard he brought to LES. I said no. She said "he's black. Fix It."

I called Vernon Siebert at Defender and asked him if he had hired a permanent officer for LES. He said no. I told him AS said the criteria was they had to be white. I could tell her was stunned. I went home with such a headache.

I called my Doctor and was written out of work for the next 2 days. Tuesday the 18th and Wednesday the 19th of August.

AS talks about her Concealed Weapons Permit and how she carries a gun. Mentioned she doesn't feel safe, especially after the County Politics Facebook page came out. I am really concerned she could lose it and hurt or kill someone. The reporter being killed by a coworker has shaken me up.

American Security and GITI

4/9/15

I brought references for R2, R1, and Anderson 3. She asked if I had called Greenville. I said no. She then asked me to close the doors and then asked again if this would have to go through the RFP process. I said no, it was a service. She then asked me if it would have to go through board approval and I said I didn't know. She said if it does, I'll need you to word it in a way that won't clue them into what we are trying to do. Something like a motion to approve Crisis Management...Blah Blah.. That way we can get County money before Stewart figures out what we are up to.

On 4/8/15, I was called and asked if I had read the paper. I said sort of. She said look whose sponsoring the rodeo. American Security...they are in cahoots with the sheriff. She said we were set-up. She said that's ok...I'll fix them, just wait and watch. Previously she had said had "fixed" their contract with GT, that they would never get it. They did.

First met with Defender at the Front porch. AS, CK and me. AS worked through several scenarios. She asked me twice to check with Anna to see if it had to be bid out. Also, does it have to go through the board approval? I asked Anna and she said it could really go either way, but with that much money, the board needed to know and approve...just in case. AS stated she wanted to get around board approval and an RFP.

After our meeting AS met with Joe Branham, Brad Jordan and one other. I was not present, but she asked me to escort them in. Later she said she had them on board to give her all the money they had provided for SRO's. Then she said "even so, in a district with a \$38 mil budget, another \$130,000 we can afford. She drew up a proposal and said "we're safe as long as we go under the auspices of placing an officer in every school. She laughed and said "the sheriff is done".

AS said Fort and Lawson wanted to meet with Defender. She had me call and tell defender to meet with him at the D.O. Met with Defender and Fort. He had numerous concerns about weapons and training, in particular shoot- don't shoot. Defender said they were trained once in shoot don't shoot. They also said their officers did not administer first-aid or CPR. I had told AS about this and she told me to call them back. I did and they were very evasive about this. She said "the board does not need to know that"

In executive session, I was asked to introduce them. I said they were defender security, a large Impressive Firm, and that Dr. Slayman should be introducing them because she had met with them much more than I had.

8/12/15

Revised Powerpoint

Conference call with AAG...BC will fix

"Rick, (board chair) has a difficult time not being supt"

8/10/15

That SOB better not have made a deal w/o the rest of the board

8/12/15

To me - "I'm going to kill Rick Hughes". "I sent Denise over to "fix" him. We're going to "fix" him.

8/12/15

Prior to meeting w/Bob Danron and Frannie-

To Ben Thompson on the phone - One of our board members who was the board chair years ago has gone rogue. He can't take it that he's not superintendent. But our board is hot and their going to "fix him".

8/11/15

At lunch during convocation told Brooke our PR sucked because the Sheriff always beat us to the punch with negative press. Brooke turned red and said "you are about to offend me".

8/17/15

Called in to AS office. "I've been dealing with attendance issues." Charles has too. So, do you want me to take attendance out from under you and give you something else or are you going to handle it? I said "I need to know what you're talking about before I can do anything about it." She said, "a Tracey Belton called Tressa and Mrs. Moseley, grandmother of Matthew G [REDACTED]." They contacted Tressa and she came to us. Are you going to handle it or do I take the department away from you?" I said "I'll handle it. This is the first I've heard of it." I had just walked in from directing traffic since we no longer had deputies helping. I called Mr. G [REDACTED] and Tressa was already handling the Belton case. A.S. will not talk to a parent. Mr. G [REDACTED] did not like my answer and emailed Slayman. She emailed him back.

8/20/15

Told AT Williams to watch Scruggs, if he left the office and left doors unlocked, let her know. "I will kill him". Have previously called CK and told him to go "rip his throat out."

She refuses to give Greg or Anna the Defender contract. Greg asked Friday, Aug. 21, 2015.
"Noone will see that but me!" (AS)

Previously, when we were discussing the board agenda, I asked her if Defender should do intro's, since neither she nor I were really very familiar with all aspects. She said, "what you don't know is I am very familiar with them because I have met with them numerous times alone."

At one point she said "are we doing the right thing?" I knew it was a set-up to say she had asked me. I said yes, you're getting more officers in the buildings.

If this security goes down, you're going down with me. When Charles was quoted in the paper, she told him, "now you're in it as deep as we are. You'll go down with us."

AS said "I lied to the board and told them each officer was permanent." You better have an officer for every school. You went on vacation in July when you could have done this" "pay them more money, I don't care. You will have all those positions filled before that meeting.

The chief and I were alone with her in the board room and she asked the chief to leave for a moment. When he left, she said "I want a white officer down there. The board chair's grandchild is there and you know that most of Lewisville is white. They won't stand for all black administrators and a black officer...YOU FIX THAT!"

First time I realized there was a problem was when she said "you were stupid to do that and if it happens again, I'll cut you off at the knees."

Said of David Brunt..."He doesn't know who he's dealing with. I'll cut his throat out.

AS showed me pictures of the little town in Idaho. Pointed out that there was maybe 2 or 3 cars on the streets midday. Then she said "when I stepped off the plane, I looked at Denise and said, where are they?" Denise said "Who?" She said, "the black people". Then she (AS) said it's 95% white, heaven man, heaven. I almost said "what are you doing in Chester?"

I'm very afraid I'm going to say something and get fired or demoted.

I couldn't carry the burden of knowing how she felt about black people, so I went to Shawn and told her. She was stunned.

AS called while I was making rounds and wanted to know if the person being sent to LES met the "criteria". Pat Henseley and Denise will be all over this. Pat has already called wanting to know if this was the right this to do by putting in Defender.

I called Andre' Williams, asked if we had someone to send to LES that met the criteria. He said he had talked to AS and she was ok with the officer he was sending over to LES. 10:15 met AS coming out of LHS on road flashed lights to get her to stop. She said "Have you seen the permanent security guard he brought to LES, I said no. She said "he's black. Fix it."

I called Vernon Siebert at Defender and asked him if he had hired a permanent officer for LES. He said no. I told him AS said the criteria was they had to be white. I could tell her was stunned. I went home with such a headache.

I called my Doctor and was written out of work for the next 2 days. Tuesday the 18th and Wednesday the 19th of August.

Charles King

①

When this matter started last Tuesday (8/25), Dr. Slayman called me late that evening to let me know she was being investigated because of an allegation of a hostile workplace...one of the first things in the course of the conversation she said was "if I go down, you know you're going down with me." She proceeded to inquire what I knew about the situation, making me "guess" (among senior staff and principals), who is the complainant. She also said "I'm really not upset about this...I'm actually amazed how much this actually is not bothering me." Her last comment to me in that call was "we never talked, this conversation never happened." Notable is that I have also received two calls (Wednesday and Friday) from Jim Knox (Principal of Lewisville High School) who indicated that Dr. Slayman called him. He asked very probing questions about the situation, and I indicated to him that I wasn't in a position to discuss it. This made me very uncomfortable.

So I write all of this knowing that this could be the end of my job in Chester and possibly my career.

She had an agenda upon my being hired...within months, I was directed to either move, release, or reassign several staff members...some who had done a good job.

In the beginning of my tenure in Chester she would harshly criticize me in front of staff and then later meet with me to tell me that she really didn't mean all that (she) said, just that she didn't want to show preferential treatment, for me, in front of her staff...she had to "establish the chain of command and let people know where things stand."

Last summer, she berated and yelled at me in front of all of the principals (multiple witnesses) with her finger in my face because a board member wanted information on her grandchild that was not legal to release (the teacher assignment). Several principals were appalled at her openly vicious treatment of me, and told me they were sorry that she did that in front of them and to me. She has treated me harshly in front of staff too many times to count.

She threatened me when a word (itinerary) was misspelled on a school board agenda. "If you want to keep your job, you WILL not let this happen again...the board will crucify you over this if it happens again!"

She terribly berated Col. Blair Turner (former Associate Superintendent, now deceased) because he shared some information with a principal that she thought should not have been shared. She told him that if he wants to remain in his job then he would never divulge anything without her permission. I truly believe that Blair's health decline was contributable to her treatment of him. She would say to me frequently, "he doesn't know what he is doing...it's time for him to go...he's too sick to be working." She even asked me if I thought her treatment to him caused his health to get worse.

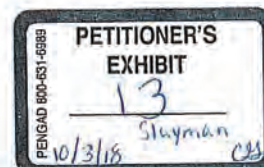
I have witnessed her derogatory remarks (to name but a few):

To Shawn: "I'll rip your throat out"

To Jeff: "I'll cut your knees out from under you...that was stupid"

To Brooke: "you screwed up my speech...this could cost you your job"

She asked me (in reference to Danny Scruggs, Director of the Alternative School) the other day - "Go and rip Danny's head off for me." (regarding a locked/unlocked door in his school).



1707
1854

KING

2

She threatened an assistant principal and a teacher with their job after they wrote a reference letter for a student who had gotten charged with a crime. They both wrote the letters as personal reference, not in their official capacity. She told me that because of that, "neither of them will never be more than what they are now and they'll be lucky if I don't fire them."

She asked our Director of Special Services (Jeanie Ligon) to amend and/or falsify a record of service (for a previous student) to the point that Jeanie asked the superintendent "do I need to get my attorney involved?"

Last year (2014), the instructional fair was awesome...everyone raved over it. However, she stated to me "you really screwed it up...the breakfast sucked, a board member said the breakfast was awful and I didn't like it either. Next year I want eggs, grits, and biscuits." This year (2015), she said I "screwed it up because Brooke's session was not included in the agenda" (this was because Brooke was late getting the request in to my secretary). Again, it is notable that the event was awesome.

The principals left a recent meeting...one stated, "she just threatened to kill us if we disagreed with her or said anything against the security stuff."

She questions everyone's ability and everyone's loyalty (Jeff, Anna, Shawn, Brooke) regularly...she has told me repeatedly that she will "get rid of Anna" (this has been stated for years now), that it's time for Shawn to go, and "I (Agnes) made a mistake hiring Jeff." She has said "I don't trust Brooke" on numerous occasions. Interestingly, she has made the comment, "I don't mess with Callie...she is too connected."

There is overwhelming environment of anxiety, unease, and tension that is lingering and ever-present. When Jeff and I are "summoned" by Callie (this happens 10-15 times in a single day on some days) to her office, we solemnly (seriously) commiserate that we are "walking the mile." We never know what we are walking into. Even as I arrive early (usually 30-45 minutes every day) to get extra work performed, she would summon me to her office, or come sit in my office. However, this did cease to a degree when she started having breakfast with her "legal advisors," "breakfast consultants," "table talk group." When she began having breakfast with that group (usually daily), she started getting to the office around 8-8:10am. Now, she advises me and/or Jeff daily about the advice she gets from her "group" regarding district business.

She has no consideration for our work time. When she summons, we must obey without question, no matter what we are doing. The principals recently complained to her that an impromptu morning meeting that she called during the first week of school was inconvenient (because they had meetings in-house that they were leading)...the result? She changed the meeting to Friday at 3:30PM (more inconvenient for all) and stated "that'll fix them from complaining." She had Jeff change the meeting time three separate times.

She does not consider our schedules for her agenda. If she needs a meeting or wants us to report to her, it must happen right now, no matter that the meeting that I am presiding over has been on the schedule for weeks, or that the meeting is currently in progress. There have been no significant issues to arise (as I recollect) to so urgently pull principals or other staff from their respective roles.

She has told me and Jeff that when she calls either/both of us, if we do not answer, she expects a call back to her within 5 minutes 24/7/365.

KING

3

Newspaper article about the new security firm...one of my quotes in the article was "keep our kids safe." She summoned me to her office. Her reaction to me in front of Jeff? "You're in this deep with Jeff and me now, if we go down you go down too!"

She sends terse e-mails to my instructional staff. They have often called me upset or even crying, concerned that they are about to lose their jobs...there is always that veil of not knowing what to expect.

We have to kowtow/beseech her for any time off (vacation, medical, continuing education, or professional meetings). We must wait until we think she is in a good mood and of a demeanor that the request would be considered.

She grills me about SCASA and other professional meetings..."Why do you need to go? Those are worthless!" I lose vacation days every year because she harangues me if I request time off and/or if I actually do get time off...it's no longer worth the effort to ask for time off. Comments like "do you really need the days off," "can I call you if I need something," "we've got issues, stay close to the phone," are rampant. She has even called me to tell me that she "really needs for me to come in, can I cancel a day off." All of these have been unwarranted. I cannot truthfully think of a single request that was urgent enough to cancel leave time. Just so I wouldn't have to ask for time off, I've allowed a previous bone graft to deteriorate. She would always question and judge for these types of requests.

On one occasion, she would not speak to me for over a week after I had a day off. Again, I have lost vacation days each year.

If I am off of work or on the weekend she will send call, text or send multiple e-mails with such messages as "this needs to be dealt with immediately," "this is urgent, see me first thing about this," "I am upset about this," "we need to discuss immediately," "get this out asap," etc. Many of these are sent late Fridays or over the weekend. Many times she will not respond when I ask for more information.

In my opinion, she has fractured community relations with the Sheriff, the County Supervisor, and other entities. I believe much of this is all self-created and driven by her breakfast group...she has relayed that to me and Jeff continually. She meets daily with her breakfast club that she refers to as her "legal team." She comes in every morning to tell me/us what her "team" has discussed what she needs to do. She discusses personnel issues and other "district sensitive" matters with her breakfast group.

She has estranged us from working with other local agencies, such as Hazel-Pittman and the Clemson Extension Agency. At the county council meeting on August 31st, there was great concern that "Dr. Slayman refuses to meet face-to-face with the County Supervisor or the County Sheriff."

She never lets an issue go. She rehashes it again and again to continue the drama. There is never closure. There are situations or issues that are prolonged for weeks, and months...issues that have long reached resolution and finality...it is as if there is no crisis then one will be relived or made new again.

My brother passed away and she asked me if I really needed more than one day off for bereavement. My nephew (same brother) died in a car accident a few months later and she asked if I really needed to go to his funeral because we did not have time to spare for it. I told her I had to go because I was a pallbearer.

I've had 2 very close friends die since then, but have not taken the time to go to their funerals because I simply do not want to be made to feel derelict in my duties by doing so.

KING

4

I have asked my physician for a sleep aid because working for her so consumes me that I sometimes stay up all night agonizing about what will happen the next day or what drama I will face. I assume this is what having PTSD is like. I am disappointed in myself that it has escalated to the point that I have developed stomach issues.

Once, when we were discussing health matters, she told me "don't worry, if you work for me long enough, you'll take blood pressure medicine too...see, it's already happened to Jeff."

I pride myself in being even-keeled and caring about my staff. It's hard to work for her as she hobbles, oppresses and suppresses her staff.

I feel I can't effectively do my job working for her. The work environment is tense, edgy, and volatile. This is minute-to-minute. I worry about the staff very deeply. Dr. Slayman is controlling to the point that we are stifled.

She directed me, Jeff, and Brooke to go interview Chester High School cheerleaders to force an alleged situation about the Sheriff to unfold and to force a cheerleader sponsor to resign. She said, "I'll get that guy this time, he is screwed."

Inappropriate interviews and meetings were held with prospective vendors regarding the security change in the district. One of these meetings had a very "inappropriate" tone.

She has monitored social media and has directed me to unfriend some people on Facebook, cited to me that "the board would be upset."

Worthy of note...I believe I've known her long enough to truthfully say that in my opinion, I do not believe that she can change even if she is given time off. She has evolved to epitomize the traits she loathed the most in her previous position (particularly her treatment by her two previous superintendents)...she was horribly mistreated by them, to the point on being on the verge of losing her job. She has become worse to her employees than her previous superintendents were to her.

I like to think that I am ready to be a Superintendent and will have my own district one day. The fear I have is that she won't let me leave or will block me from leaving. I know she did that with Jeff, Lee Green, and Shawn, and I strongly suspect she has done that with me. Admittedly, I've applied in other places. I have no proof, but once she got involved I did not get chosen. I was a finalist last winter for a Superintendent's position in Florence 2...after I did not get selected, Dr. Slayman said that she had talked numerous times to the Chair of that board (also the head of the search committee). She said she had gotten "very close to him." At that point, she stated that if I would "stick with her" she would "get my money right" by summer (2015). Obviously this has not happened.

She has always been very controlling and driven, and she is a masterful delegator...but she has not always been so hostile, divisive, spiteful, vindictive, and cruel.

I feel like I have to stand up now and protect the staff, even if she throws me under the bus and I "go down with her." I need to protect them. I am hoping that only the senior staff will have to be interviewed.

Ms. Williams was directed to "gross up" the chief of security's salary

Sadly, what I have learned from Dr. Slayman is what not to do and how not to treat people as a leader.

September 8, 2015

Denise Lawson, Board Chair
905 Lingle Lane
Chester, SC 29706

Dear Mrs. Lawson,

We are formally filing an official grievance due to a hostile work environment, implications of ethical violations, and racial and threatening remarks by Dr. Agnes Slayman, Superintendent of the Chester County School District.

We are requesting a closed door meeting of the Board as a group to present our concerns to the Board of Trustees. We respectfully request that Dr. Slayman not be in attendance during this meeting.

Sincerely,

Dr. Charles King, Associate Superintendent of Instruction



Mr. Jeff Gardner, Associate Superintendent of Operations



Ms. Shawn Williams, Executive Director of Human Resources



Mrs. Anna Stroud, Executive Director of Finance



Mrs. Brooke Clinton, Public Information Officer



cc: Allison Hanna, Attorney



Dr. Charles King

Primary Concerns I have witnessed:

She attempted to force the Director of Special Services (Mrs. Jean Ligon) to alter IDEA records of a former student. The director refused, to the point she (Mrs. Ligon) had to threaten to procure her attorney. Things got so terse and tense that Mrs. Ligon asked the superintendent "do I need to get my attorney involved?" **I witnessed this interaction.

Ms. Williams (HR Director) was directed to "gross up" the chief of security's salary. The job posting indicated a salary of \$38K...immediately after the chief was hired, he was "grossed up" to the \$60's, so that he would "draw" in the high 30's. The public was not informed of this, nor was the entire board. We Mr. Gardner and I conducted the interviews, she would not allow us to tell the candidates (if they asked) whether or not the position would be district employed or Defender employed. This made the interviews very uncomfortable...we (the district) pay benefits, and Defender does not. **Mr. Gardner, Ms. Williams, and I were involved in this interaction.

Newspaper article about the new security firm...one of my quotes in the article was "keep our kids safe." She summoned me to her office. Her reaction to me in front of Jeff? "You're in this deep with Jeff and me now, if we go down you go down too!" She stated to me and Mr. Gardner, "I (Slayman) lied to the board and told them you were in on all of the interviews." She also lied to the public and the board about the guards having arrest powers. The board attorney informed the superintendent last November that the guards would not have arrest powers. She still told the board and the public that they would. **Mr. Gardner and I were present.

**She stated to me that she dismissed Mrs. Stroud's sexual harassment claim as bogus and that she (Mrs. Stroud) was just trying to save her job.

Just yesterday (9/17), she had two individual board members in her office at separate times for hours each. One (not the Chairperson) even sat in on a newspaper interview. This is a policy violation. **This is documented on video and be other personnel.

Hostile Workplace/Inappropriate Activity I have witnessed:

Continual threatening/derogatory remarks (to name but a few):

To Ms. Williams: "I'll rip your throat out"

To Mr. Gardner: "I'll cut your knees out from under you...that was stupid"

To Mrs. Clinton: "you screwed up my speech...this could cost you your job"

She asked me (in reference to Danny Scruggs, Director of the Alternative School) the other week - "Go and rip Danny's head off for me." (regarding a locked/unlocked door in his school).

The principals left a meeting...one stated to me, "she just threatened to kill us if we disagreed with her or said anything against the security stuff." **All principals witnessed this threat.**

She threatened an assistant principal and a teacher with their job after they wrote a reference letter for a student who had gotten charged with a crime. They both wrote the letters as personal reference, not in their official capacity. **She told me** that because of that, "neither of them will never be more than what they are now and they'll be lucky if I don't fire them."

When this matter started last Tuesday (8/25), Dr. Slayman called me late that evening to let me know she was being investigated because of an allegation of a hostile workplace...one of the first things in the course of the conversation she said was **"you know if I go down, you you're going down with me."** She proceeded to inquire what I knew about the situation, making me "guess" (among senior staff and principals), who is the complainant. She also said "I'm really not upset about this...I'm actually amazed how much this actually is not bothering me." Her last comment to me in that call was **"I was not supposed to call you, we never talked, this conversation never happened."** Notable is that I have also received two calls (Wednesday and Friday) from Jim Knox (Principal of Lewisville High School) who indicated that Dr. Slayman called him. He asked very probing questions about the situation, and I indicated to him that I wasn't in a position to discuss it. **This made me very uncomfortable and I felt that it was a breach of ethics.**

She directed me, Jeff, and Brooke to go interview Chester High School cheerleaders to force an alleged situation about the Sheriff to unfold. **She said to me of the Sheriff, "I'll get that guy this time, he is screwed."** She has been on a headhunt against the Sheriff since he has been elected.

She constantly questions everyone's ability and everyone's loyalty (Jeff, Anna, Shawn, Brooke) regularly...**she has told me repeatedly** that she will "get rid of Anna" (this has been stated for years now), that "it's time for Shawn to go," and "I (Agnes) made a mistake hiring Jeff." She has said "I don't trust Brooke" on numerous occasions. Interestingly, she has made the comment, "I don't mess with Callie...she is too connected."

Last summer, **she berated and yelled at me in front of all of the principals** (multiple witnesses) with her finger in my face because a board member wanted information on her grandchild that was not legal to release (the teacher assignment). Several principals were appalled at her openly vicious treatment of me, and told me they were sorry that she did that in front of them and to me. She has treated me harshly in front of staff too many times to count.

She threatened me when a word (itinerary) was misspelled on a school board agenda. "If you want to keep your job, you WILL not let this happen again...the board will crucify you over this if it happens again!"

Without a doubt, she has used her position to fracture community relations with the Sheriff, the County Supervisor, and other entities. She blatantly refuses to meet with the Sheriff or the County Supervisor. I believe much of this is all self-created and driven by her breakfast group...she has relayed that to me and Jeff continually. She meets daily with her breakfast club that she refers to as her "legal team." She comes in every morning to tell me/us what her "team" has discussed what she needs to do. **She admits (in front of senior staff) that she discusses personnel issues and other "district sensitive" matters with her breakfast group.** She advises me and/or Mr. Gardner daily about the advice she gets from her "group" regarding district business.

Several principals recently complained to her that an impromptu morning meeting that she called during the first week of school was inconvenient (because they had meetings in-house that they were leading)...the result? She changed the meeting to Friday at 3:30PM (more inconvenient for all) and stated "that'll fix them from complaining." She had Jeff change the meeting time three separate times.

There is **always** an overwhelming environment of anxiety, unease, and tension that is lingering and ever-present. When Mr. Gardner and I are "summoned" by Ms. McConnell (this happens 15-20 times in a single day on many days) to her office, we never know what her temperament will be. It is always dramatic and urgent, no matter what the situation.

The work environment is always tense, edgy, and volatile when she is here. This is minute-to-minute. I worry about the staff very deeply. Dr. Slayman is controlling and explosive to the point that we are stifled.

I like to think that I am ready to be a Superintendent and will have my own district one day. The fear I have is that she won't let me leave or will block me from leaving. I know she did that with Mr. Gardner, Lee Green, and Ms. Williams, and I strongly suspect she has done that with me. Admittedly, I've applied in other places. I was a finalist last winter for a Superintendent's position in Florence 2...after I did not get selected, Dr. Slayman said that she had talked numerous times to the Chair of that board (also the head of the search committee). She said she had gotten "very close to him." I believe this was very inappropriate, especially when she stated to me that "he and I have become very good friends." At that point, she stated that if I would "stick with her" she would "get my money right" by summer (2015). Obviously this has not happened. Of the other two places I applied, I find it ironic that she invited both of those superintendents to the Chester District Office and that she might be "interested in one of those jobs."

Dr. Charles King

**Report Prepared
For
Chester County School District Board of Trustees
September 3, 2015**

This report details information gathered on August 31 and September 1-3, 2015, by Betty Bagley operating as a special consultant to the district board of trustees. As an introduction to my background, I have not had the opportunity to work or visit at anytime in Chester County. To my knowledge I don't know anyone who lives in Chester County nor have I spoken with anyone except for the individuals that I have interviewed.

I have been an educator for the last 46 years in districts across the state. My education portfolio includes degrees from Southern Wesleyan University, The Citadel, and Clemson University. Presently I am a PHD Candidate in leadership at Clemson University. Work experiences range from classroom teacher to district superintendent. For twenty years I served as superintendent in Bamberg School District One and Anderson School District Five. Presently I work as an adjunct instructor at Anderson University responsible for leadership growth in graduate students who aspire to be administrators. In addition, I work across the state promoting innovative educational strategies that will move our students toward meeting the requirements of The Profile of the South Carolina Graduate.

During the course of my career, I have been fortunate to be honored as The 2000 Rural Educator of the Year (sponsored by the South Carolina Association for Rural Education), 2008 Superintendent of the Year, and the 2013 Life-Time Achievement Recipient (both sponsored by the South Carolina Association of School Administrators).

The charge was to investigate allegations made by a district employee that the Superintendent had created a hostile work environment for district office employees.

The following individuals were interviewed: Jeff Gardner, Shawn Williams, Brooke Clinton, Anna Stroud, Dr. Charles King, Jean Ligon, Callie McConnell, and Dr. Agnes Slayman.

Initially, I would like the Board to understand that:



- Individuals who gave their insights and knowledge into the assessment of the district's culture did so with the belief that their jobs could be in jeopardy and that there were no personal gains (promotions or money) from sharing their experiences.
- Also, individuals gave personal accounts or told of events they personally witnessed in interactions with the Superintendent.
- Individuals spoke freely and also provided personal notes to me as the consultant.
- Further, more than half of the senior staff currently are under physicians' care for work stress and depression because of their work environment. Staff members shared their individual concerns about the health and stress of their colleagues, talking about how difficult it is to watch each other struggle with blood pressure, tears, and trembling.
- Each individual stressed that there is not a conspiracy to undermine the Superintendent but rather each wanted to share their personal concerns about the well-being of the district.
- There are individuals who are considering a lawsuit against the district due to the degree, length, and duration of the hostile environment that they have endured.

I am going to describe the results of my interviews and provide details of the more serious allegations.

- The Superintendent's behaviors have been described as spiteful, vengeful, mean, cruel, vicious, bullying, insensitive, paranoid, moody, divisive, and hostile. These are the actual words used by the staff. Here are some examples:
 - The Superintendent said publicly to staff "our PR program sucks."
 - The Superintendent spoke about a staff member being out with his dying mother and questioned why he would take off time to be with her. After his mother passed away, and as the Superintendent was leaving the funeral, she

commented "Well now she's dead so he doesn't have an excuse to be out anymore."

- Superintendent met with Transportation Director and intimidated her by leaning over directly in front of her face and stating "If I find out you sent that driver over here, I'll have your job for trying to incite a riot".
- Superintendent has been described as a "paranoid individual who allows her fear to rule her actions without any concern for the people she negatively impacts".
- Superintendent has been described as "not a nice person". Her leadership style has been described as "selfish, vindictive, cruel, and bullying".
- Superintendent has "very good ideas but she strives to implement her initiatives with the idea of being the first to do something without fully investigating and planning implementation".
- Staff receives "terse emails" that will often leave the staff upset or even crying. "Staff is concerned about losing their job . . . there is always that veil of not knowing what to expect".
- Superintendent rehashes issues again and again. "There are situations or issues that are prolonged for weeks and months . . . issues that have long reached resolution and

finality . . . it is as if there is no crisis then one will be relived or made new again”.

- “There is an overwhelming environment of anxiety, unease, and tension that is lingering and ever-present”.
- The Superintendent rescheduled a meeting to a Friday afternoon at 3:30 after the principals stated they had a conflict in the morning, and then she said “that’ll fix them from complaining.”
- The Superintendent talks about individual staff members to others: “I am going to get rid of her,” “I made a mistake hiring him,” “It’s time for her to go,” and “I don’t trust her.”
- The Superintendent informed a staff member that the Board Chair instructed her to contact another Superintendent and report that an employee who was released from her position was “toxic” even though the employee was in good standing.
- In front of others, the Superintendent has called employees “stupid” on numerous occasions.
- In front of others, the Superintendent told an employee “you screwed up my speech; that could cost you your job.”
- After an employee’s brother passed away, the Superintendent asked if the employee really needed more than one day off for bereavement. The Superintendent did not want the same employee to use leave for his nephew’s funeral because “things are busy.” The employee was a pall bearer and did use leave.
- The Superintendent lined up senior staff members in a row and while pointing her finger at them angrily asked if they had shared information

- After requesting an employee to be at a meeting outside of regular hours, which required costly child-care arrangements, when the employee arrived at the meeting the Superintendent said publicly "I don't need you here."
- The Superintendent has told staff members on several occasions "if I go down, you are going down with me."
- Dr. Slayman contacted one employee after being placed on leave and asked the employee to "rank the odds" of who complained to the Board about her. At the end of the call, the Superintendent said "This conversation never happened."
- She loudly berated a cabinet member in a principals' meeting, putting her finger in the employee's face.
- After Colonel Turner's health began declining, she discussed his medical issues with and told others he was too sick to work. After his death, she asked an employee if her harsh treatment of Colonel Turner contributed to his death.
- The Superintendent has made threatening remarks to the staff on numerous occasions, estimated as 1-2 times a week. Examples of threats include:
 - In a cabinet meeting the Superintendent said to an employee, "I will cut your throat out if you ever speak to the Board again." This was in response to the employee thanking the Board for attending an event.
 - "Take this to the grave or I will kill you."
 - "I will crucify you."
 - "I will cut your knees out from under you," "I will kill you," and "will cut your legs off."
 - In reference to an employee, the Superintendent instructed a cabinet member to "go and rip his head off."

- Principals are concerned because she said she would kill them in a meeting about security.
- Regarding a non-employee, "He doesn't know who he is dealing with; I'll cut his throat out."
- After an employee brought a concern to the Superintendent's attention, she became so upset and said of the employee's supervisor "I swear I will kill her" and berated the supervisor in front of others.
- After a Board meeting, the Superintendent told an employee "That SOB I am going to kill that Rick Hughes." Also, "that SOB better not have made a deal with the other Board members."
- When staff makes a mistake or is believed to make a mistake, the Superintendent will threaten with "if you want to keep your job, you will not let this happen again . . . the Board will crucify you over this if it happens again" or "the Board will be upset." She routinely threatens their employment. An example is when a word was misspelled on an agenda, and she said in front of others, "if you want to keep your job you will not let this happen again."
- The work environment has been described as "tense, edgy, and volatile".
- Staff feels professionally threatened.
- Staff has been directed to unfriend some people on social media because "the board would be upset".

The staff members reported several potential ethical issues, including the following:

- The Superintendent told a principal that "you don't have to have him [an employee] back" when the employee was called up for required military leave that could not be rescheduled.

- The Superintendent asked an employee to provide false information to a college about a former student. The coercion was so severe that the employee asked if she needed to get her own attorney.
- The Superintendent required an employee to drive her to a job interview in another county during the workday.
- The Superintendent interviewed the ultimately successful security chief prior to the actual interviews and outside the regular process and told him he had the job. Also, the Superintendent advertised the position at \$38,000, but then required staff to "gross up" the salary to \$62,000.
- She told an employee that Idaho is 95% white and as a result is "heaven." This upset staff greatly.
- Two employees promoted to Executive Director and were told by the Superintendent that they would receive a raise at the end of the year if the fund balance was good. Raises were not provided to either employee due to one not having a degree. However, since the Idaho comment was made, one of the employees believes that race may be a factor.
- The Superintendent commented in a meeting that a child would be justified in committing patricide or killing his parents.
- The Superintendent asked the staff to lie to the Board about the security officer issue so that no one would know what she was trying to do. Instructed staff not to tell Board that Defender officers did not provide first aid or CPR. The senior staff has not yet seen a final contract for Defender.
- She blamed a student for allowing a staff member, who was fired, to "come on to her" and refused to allow the child to transfer to another high school because the principal did not want her. Even though the student was not a discipline

problem, the Superintendent would allow a transfer only to the alternative school.

- The Superintendent was very upset that there was a black security officer assigned at LES. She angrily told a senior administrator "He is black; fix it!"
- The Superintendent accused an outside administrator of "setting us up" and directed an employee to lie in order to get out of the meeting.
- The Superintendent directed several employees to interview cheerleaders in an effort to force the sponsor to resign and "get" the Sheriff by saying "I will get that guy this time, he is screwed."
- The Superintendent directed the senior staff not to tell the other Board members that the Board Chair went to Idaho because others had wanted to go.

The staff members reported other issues, including the following:

- Senior leadership team told not to speak to the Board or make eye contact, and if they did to make sure there are no facial expressions during a board meeting.
- Senior leadership team told to not speak to the Herald Newspaper, Telephone Company, County Supervisor, Sheriff, YMCA, Boy/Girl Scouts, Hazel Pittman, United Way, Chester Paper, and TV stations.
- The staff has to beg for time off, even for professional meetings. They report waiting until she is in a good mood to ask for leave. The Superintendent makes comments such as: "Do you really need the day off?" and "Please stay close to the phone." The staff indicated that it is almost not worth asking off. She will not speak to employees after they ask for time off. She berated an employee for taking vacation in July when an issue later arose in August.

- Two senior leadership team members were told that when the Superintendent calls, she expects a call back to her within 5 minutes 24/7/365 no matter what.
- The Superintendent has no consideration for staff's schedules. If the Superintendent needs a meeting or wants staff to report to her, it must happen right now no matter if staff is conducting a meeting. When summoned, staff must obey without question, no matter what is being done.
- The Superintendent is known to not speak to or look at members of the senior leadership team when displeased with their actions and believes they are not loyal if they wish to leave the district's employment. The Superintendent has hampered their ability to leave the district with poor references that have been overheard by others. She routinely uses the silent treatment with staff.
- The Superintendent meets with a group of men that have been described by her as her "legal advisors", "breakfast consultants", "table talk group", and "political and breakfast cabinet advisor". Senior staff knows and believes that District personnel and other legal matters are discussed with this group.
- Superintendent has said on a number of occasions "if she went against her 'breakfast club' she would be ruined".

I also spoke with Dr. Slayman for almost three hours. She said she was surprised by the complaint and is shocked by her staff's perception of her and her management style. She either denied or attempted to explain the alleged conduct and comments. She did admit she had said on maybe 2 occasions that she would kill someone. She stated that she can "fix" the situation.

Conclusions

1. I believe that the staff has accurately explained and described their work environment. The hostile environment has escalated over the past 2 years.

two individuals were also consultants for Slayman in Chester. The OGC has heavily criticized me for accepting the testimony of consultants who were only periodically in the school district over the testimony of the five grievants. However, my reason for attributing weight to the testimony of Stiver and Teal was not because they were consultants, but because they had been previous employees of Slayman. Both testified that they had never experienced bullying by Slayman nor had Slayman created a hostile atmosphere in Kershaw. In fact, Stiver testified that he and Slayman had disagreed from time to time during their employer/employee relationship but had always worked out their differences in an amicable and professional manner. I found this to be very significant in that it establishes a course of conduct that is very different from that described by the five grievants.

Likewise, Callie McConnell (McConnell), Slayman's administrative assistant in Chester, testified that she had never seen or heard the behaviors described by the five grievants. Notably, her office was immediately outside of Slayman's office and she had daily contact with Slayman and the senior cabinet members. She testified that Slayman's door was left open except when discussing confidential matters. She also testified that she could have heard raised voices through Slayman's closed door if such had occurred. However, she testified that she had never heard raised voices coming from Slayman's office. Finally, she testified that she had never seen evidence of a hostile work environment during Slayman's tenure with the District. McConnell stated that she had a good working relationship with Slayman and enjoyed working for her. Notably, McConnell is African-American and she testified that she had not seen evidence of racism or racist remarks from Slayman. In fact, Slayman had promoted more African Americans into administrative positions than any other superintendent.

The testimony of the School Board (Board) members was also important in that their testimony served to invalidate allegations of the five grievants that Slayman had failed to inform Board members of critical information or had misrepresented such information to Board members. Their testimony also corroborated Slayman's allegations that certain political machinations played a role in this case.

At this point, I had heard testimony on behalf of Slayman from the following:

1. two previous employees of Slayman's from the Kershaw School District who testified that Slayman had never conducted herself in the manner described by the five grievants when she was in that district;
2. Slayman's administrative assistant who testified that she interacted with Slayman daily, that her office was adjacent to Slayman's, and that she had never witnessed any of the behaviors described by the grievants;
3. Board members who testified that Slayman had informed them of the very matters that the five grievants alleged that Slayman had failed to inform the Board about or had misinformed the

Board about, and that they had heard no rumors of the behavior described by the grievants in the small Chester community; and

4. other witnesses who attested to Slayman's courteous and professional conduct.

Conversely, I had heard testimony from five grievants who described horrendous, abusive behavior on the part of Slayman and I had heard testimony from Ligon who had not witnessed any of it.

Because of the highly factual nature of this case and the conflicting testimony of the witnesses, an assessment of the credibility of the witnesses and their testimony was key to making findings of fact and to providing the SBE with a reasonable recommendation regarding disciplinary action. There was no testimony or evidence that suggested that any of Slayman's witnesses had credibility issues with their character or the testimony they gave. Notably, the OGC has not alleged any credibility issues with Slayman's witnesses.

Alternatively, the prior conduct of two of the OGC's witnesses brought their character and the truth and veracity of their testimony into question. The testimony of Gardner also exhibited credibility issues. The testimony of the remaining witnesses was given little weight as discussed below. The only OGC witness who did not exhibit concerns (credibility or otherwise) was Ligon. However, her testimony was of little value in that she admitted that she did not witness any of the behavior described by the five grievants.

OGC witnesses Dr. Charles King (King) and Stroud presented the most egregious credibility issues. Per the testimony of Dr. Angela Bain (Bain), successor to Slayman's position in the District, King supervised an employee's administrative certification through Western Governor's University. This required that he observe and document her work through the University. During this period, he allowed the employee to access the portal where his documentation was to be placed. The employee, in turn, completed the documentation in King's name and submitted such to the University. He initially denied giving the employee access but was confronted with an email proving that he provided access. Bain investigated this through the University and obtained documentation. King then left the employ of the District and the matter was reported to SCDE. Contrary to the comment of the OGC, King did testify regarding this matter and admitted that he resigned as a result of it. (See Tr. p. 137-138, L. 25-15 and p. 154-155, L. 24-6). More specifically, King testified that he forwarded the employee a link for the purpose of her checking her status. He further testified that he was never offered the opportunity to refute the allegation or provide testimony on his own behalf. However, it is undisputed that the link that he sent allowed her to submit false documentation in his name per the documents obtained by Bain and that he initially denied doing such until confronted with the evidence. I found Bain's testimony regarding this matter to be credible.

The OGC correctly notes that the transcript does not state that the employee provided the email. It states "And then we had an e-mail that shows that he did". (Tr. p. 1090, L. 3-4) This was my misreading of the transcript, not facts taken from another case as the OGC states. However, for purposes of this case, it is irrelevant who provided the email – what matters is that there was an email showing that King, in fact, provided the access and was untruthful with Bain about such. I will correct my misstatement in the amended report but my assessment of the credibility of King remains the same.

King was also implicated in a matter prior to the one named above. That matter involved the use of the District's Mi-Fi at his rental home in Chester. King first testified that he borrowed a Mi-Fi that was not being used. (See Tr. p. 132-133, L. 25-4). He then testified that Slayman was okay with him using the Mi-Fi in that it was in lieu of a cell phone and that she had never confronted him about it. (See Tr. p. 133-134, L. 6-5). Slayman testified that the Mi-Fi was purchased by the District for use by employees going to conferences who may be in places where you could not get internet service. Slayman began looking for the Mi-Fi to take to a conference and discovered by accident that King had it. She testified that she did not know that he was using it at home and she demanded that he return it. She further testified that he became upset when she indicated that they would need to discuss this. (See Tr. p. 1250 – 1252, L. 18-6). King's testimony with regard to this was inconsistent in that he first stated that he borrowed the Mi-Fi, then stated that it was given to him in lieu of a cell phone. Further, it is highly doubtful that Slayman and/or the District intended to provide King with free home internet service when such was not offered to the Superintendent. (See Tr. p. 1251, L. 22-24). Slayman's testimony on this point was consistent and believable.

The Mi-Fi incident brings up two credibility concerns. First and foremost is King's unauthorized use of District property. Second, is his conflicting testimony with regard to use of the Mi-Fi. I do not find King to be a credible witness and I do not find his testimony in this case to be credible.

The OGC attempts to bolster King's credibility by stating that he was so well respected that he was appointed interim administrator. This statement is misleading. At the time of his appointment to the position of interim superintendent, there is no evidence that the Board was aware of the Mi-Fi incident in that Slayman and King never finished their discussion about this incident due to the grievance. Further, the incident involving King providing the employee access to the portal for his submissions to Western Governor's University occurred after Slayman's tenure as superintendent and well after he had served as interim superintendent. Thus, these matters were unknown to the Board at the time of his appointment to that position. Further, King admits that Board member Lawson informed him that his role as interim was temporary until they could find another interim and that the only reason he was named interim was that he was the only one in the building with a superintendent certification. (See Tr. p. 131-132, L. 23-11). Notably, Dr. Keith Callicut was thereafter named Interim Superintendent.

As noted in my report, Stroud was the most venomous of the five grievants. In making this statement, I was attempting to convey that Stroud was openly hostile in her testimony about Slayman. It is undisputed that Stroud did not have the credentials to be the Director of Finance for the District, but nonetheless, was serving in that position. Various school board members testified that she lacked competency and that her salary had been frozen prior to Slayman's tenure in the District until such time as Stroud completed certain educational requirements. Stroud did not complete the educational requirements but continued to take raises. The OGC defends this by stating that the Board passed the budgets with her raises in them. Although not stated in these terms in the transcript, the stark reality is that Stroud used her knowledge of the budget process to make unauthorized transfers of money to herself. School Boards do not vote on each employee's salary by line item. Thus, it would have been impossible for them to know without drilling down into the salary amount for each employee in Stroud's department that Stroud had given herself a raise. Notably, the only way this was discovered was when a salary study was conducted and the Board could not understand why Stroud's salary was the same as Williams' salary. (See Tr. p. 1184-1185, L. 12-19). This is a significant credibility concern. I do not find Stroud to be a credible witness.

Gardner was having job performance issues. These were noted in testimony by Board members and Slayman. (See Tr. p. 557, L. 13-18; Tr. p. 885-886, L. 18-9; Tr. p. 1279-1280, L. 21-25). Also, Gardner had applied for the superintendent's position at the time that Slayman was hired and was disappointed that he did not get the job. In fact, he had even told those he worked with that he would be moving to the District office, but this did not come to pass and Slayman was hired instead. The OGC states that Gardner only sought the interim superintendent position which is consistent with Gardner's testimony. However, numerous other witnesses testified that he applied for the superintendent's job and voiced his expectation that he would be selected to others. Please see Tr. p. 555, L. 8-10; Tr. p. 598-599, l. 24-16; Tr. p. 624-625, L. 16-20; Tr. p. 844, L. 12-22; Tr. p. 884-885, L. 17-13. It should be noted that Mr. Gardner became quite hostile and agitated when he was asked about this in cross examination. This testimony can be found at Tr. p. 245-246, L. 17-23.

As the testimony progressed in this case, I began to see that many of the allegations Gardner made against Slayman were refuted by other witnesses, leaving the credibility of his other statements in question. I have outlined those in my report. Curiously, he was the only person who alleged hearing any racial remarks from Slayman and he was the only person present when Slayman purportedly made each of the remarks. Per the testimony of Williams, Gardner then relayed these alleged comments to her, which, in turn, influenced her to sign the grievance. Notably, Williams is African American. One of the racial remarks purported to have been made by Slayman to Gardner was about her trip to Idaho. Slayman also discussed the Idaho trip with Mrs. Stroman (Stroman), a Board member. Stroman testified to the comments made to her by Slayman about this trip. Many of the words were the same but the context was very different with no racial overtones.

In other testimony by Gardner, he admitted that he could not afford to lose his job in that he had a family to support. (Tr. p. 238-239, L. 12-23). He also admitted at one point in his testimony that he was the person who orchestrated the grievance. This testimony was corroborated by King. (Tr. p. 128-129, L. 18-2). However, Gardner attempted to recant that admission as his testimony proceeded. (Tr. p. 219-220, L. 7-13).

Finally, in a very interesting line of testimony, Gardner has benefited from the firing of his supervisor in the past. He was Assistant Principal at Chester High School and later became Principal after his supervisor, the Principal, was fired. (Tr. p. 239-242, L. 25-14).

Based upon the above, I do not find his testimony to be credible.

The OGC emphasizes the testimony of Gardner stating that his health concerns are related to Slayman's treatment of him. For the reasons stated above, I do not find this testimony to be credible. First, there is no documentary evidence showing that he had health concerns. Further, there is no proof that these health concerns were caused by Slayman as opposed to stress caused by the inability to perform his job.

Williams, the Director of Human Resources, testified regarding an incident that happened with Slayman approximately two years before the grievance was signed. She confronted Slayman about the incident immediately after it occurred, Slayman apologized, and the matter was resolved by both parties. Williams admitted that Slayman never exhibited this conduct to her again. Yet, Williams elected to sign this grievance two years after the fact and long after the time frame to file a grievance had expired. Williams testified that she did not sign the grievance until Gardner relayed racial statements purportedly made by Slayman to her. (Tr. p. 268, L. 18-22). Slayman admits that an incident occurred between Ms. Williams and herself, however, she denies making the statement described by Williams and others. Although I believe that some incident occurred between Slayman and Williams, I do not believe that it was of the severity described in the testimony. Williams has many years of experience in Human Resources. In this instance, she served as the Director of Human Resources. If she experienced conduct of the magnitude and severity she described, it was incumbent upon her as the Director of Human Resources to report that conduct to the appropriate authority within the time frames established by the District. Instead, she chose to handle the matter via a private conference with Slayman. However, two years later, she dredged this matter up after hearing about a purported racial statement. This is very troubling to me and I did not give great weight to her testimony.

The OGC has taken issue with my reference to the District's policy regarding the time period for filing a grievance in that such was not introduced at the hearing. I properly took judicial notice of the policy in that it is readily available on the internet and I provided the website in my original report on page 24 at footnote 46. S.C. Rules of Evidence, Rule 201 governs judicial notice and makes clear that a court may take judicial notice whether requested or not. It further states that "[a] judicially noticed fact must be one not subject to reasonable dispute in that it is either (1)

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generally known within the territorial jurisdiction of the trial court or (2) capable of accurate and ready determination by resort to sources whose accuracy cannot reasonably be questioned. The Chester County School District's website is such a source.

Clinton, the Public Information Officer for the District, was moved to sign the grievance based on statements from coworkers alleging physical ailments caused by Slayman and alleging matters that led Clinton to believe that Slayman had been untruthful to her. There was no testimony in the record indicating that she questioned the validity of these statements (See Tr. p. 336-337, L. 20-21; Petitioner's Exhibit 15). This is reflective of the naivete I found in other portions of her testimony. For example, she testified that Slayman "could hold you on a hook and scare you". To illustrate this, she testified that Slayman had sent her an email indicating that she was upset with her, but was not available that day to discuss the email with Clinton. Clinton interpreted Slayman's failure to meet with her that day to be an attempt to "hold her on a hook and scare her". It should first be noted that the email that was the genesis of this statement was never introduced into evidence. Thus, the actual language used by Slayman in the email is unknown. Second, there was no acknowledgement by Clinton that Slayman may have had other concerns that day which precluded her from being immediately available to Clinton, but sent the email to Clinton as a reminder to discuss the issue. This matter was not addressed with Slayman on direct or cross examination. Clinton's decision to join the grievance was, by her own admission, colored by the influence of others. Based upon this, I did not give weight to her testimony.

Because of the issues described above with the OGC's witnesses, it would have been most helpful to have corroborating witnesses testify to the events that took place in the presence of others. For example, King testified that he was berated by Slayman at an administrator's retreat in front of a cadre of principals. It would have been helpful to have some of those principals who observed this behavior to testify to the event. Likewise, Gardner testified that Slayman berated the supervisor of the bus drivers. However, the supervisor of the bus drivers was not called to testify. The OGC has taken issue with my statements regarding this. The OGC suggests that Slayman could have called these witnesses. In another passage discussing the Bagley Report, the OGC suggests that I could have subpoenaed other Board members for testimony. The burden of proof in this matter lies with the OGC, not with Slayman. Thus, it was the duty of the OGC to call the witnesses to prove its case. Further, it would have been inappropriate for me, as the hearing officer in this matter, to subpoena anyone. Both parties were represented by legal counsel and it was their duty to provide testimony to prove their case.

In the following paragraphs, I will respond to other comments of consequence of the OGC whereby my findings need to be explained or clarified or where the OGC's comment is not supported by the record. My failure to respond to a particular comment is not to be construed as agreement with the OGC, but rather that I do not feel the comment to be of such consequence that I should respond to it.

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1. The OGC incorrectly states that I omitted the fact that the Board voted 4 to 3 to accept Slayman's resignation. Please see footnote 1, page 4 of my original report whereby this information was stated.

2. The OGC has correctly stated that I did not discuss "the improvement plan/expectations". This 'plan' was never adopted by the Board, and there was no documentation introduced into the record with regard to it. Accordingly, I did not include it in my report. The facts in the record pertaining to this are as follows. At some point after the Bagley Report was provided to the Board but before the September 8, 2015 grievance letter, attorneys for the District drafted a proposed improvement plan. According to the testimony of Board Member Maggie James, the Board refused to adopt it and Slayman testified that she refused to agree to it. Slayman was then tasked with drafting her own improvement plan. She testified that she intended to retitle the document "Expectations" and she changed the wording because there was no basis for the allegations. She resigned before this was finished when "all that spectacle got so bad". (Tr. p. 983-984, L. 10-10; Tr. p. 1375-1381, L. 14-2). The fact that Slayman was being allowed to draft her own "improvement plan/expectations" is significant. The action of allowing Slayman that privilege indicates that the majority of Board members did not believe the allegations against her, but were providing themselves legal cover in the form of an improvement plan to show that the allegations had been addressed. If the Board had believed the allegations against Slayman, immediate action would have been necessary in the nature of either a dismissal or a tightly drafted improvement plan with no option for negotiation. Out of an abundance of caution, I will include information related to this in the report and I will note the lack of documentary evidence.

3. The OGC emphasizes Dr. Slayman's refusal to work with the new Chester County Sheriff, Alex Underwood, and the strain this purportedly placed on Gardner. In testimony at the hearing, the OGC attempted to tie this to the hostile work environment claim. There was much testimony about this from a panoply of different witnesses from both sides. The gist of this testimony was that the sheriff did some active shooter training in the schools and noted certain weaknesses. Thereafter, the sheriff publicized the weaknesses. This, in turn, placed the schools in danger in that it told the public where the schools could be accessed. Slayman addressed her displeasure regarding this issue with the sheriff. The problems with the sheriff were not limited to the schools, but extended to many other county services, such as the fire and EMS services as well as the County Supervisor. With this as history, it would be inappropriate and unfair to second guess Slayman's decisions with regard to the sheriff. However, it should be noted that the District later sponsored first responder training and the sheriff's office was invited but elected not to come.

Notably, since this hearing, Sheriff Alex Underwood has been indicted on federal charges of abuse of police power, false arrest, conspiracy, and other charges. He has been removed from office by Governor McMaster. Interestingly, the charges of abuse of police power coincide with the testimony of Slayman and the other board members who testified regarding the political nature of

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this grievance and the belief that it is tied to the replacement of the SRO's in the schools with Defender officers. Notably, each of the five grievants blamed Slayman for the removal of the SRO's, rather than the actual decision maker, which was the Board. The following are two very interesting passages of testimony from Maggie James, Board Member, and Slayman about the events of this period: Tr. p. 949-950, L. 7-10; Tr. p. 1398-1401, L. 12-18. In reading these passages, please remember that it was Anna Stroud's telephone call to Dr. Hughes that relayed the news of these allegations against Slayman. Anna Stroud's husband worked for the new sheriff, Alex Underwood. Dr. Hughes was the doctor for the jail.

4. The OGC states that the issue of inappropriate discussions of District matters with local breakfast club members was not an issue in this case, but addressed in my report. The OGC further notes that this issue was not noted in their prehearing statement or Proposed Order. It should first be noted that the OGC's prehearing statement was never entered into evidence at the hearing. Out of an abundance of caution, I looked at all the issues raised by the five grievants that could result in unprofessional conduct since such issues had been raised in testimony.

5. The OGC's last two paragraphs on page 33 indicate, in essence, that I have gone to great lengths to issue a recommendation in favor of Slayman. That is an unfair and untrue assessment. I have approached this case in the same disinterested, detailed manner that I have approached all other cases. I have no personal interest in this matter and the only people that I knew walking into this hearing were the court reporter and the staff of the OGC. I had heard of King and the incident described by Bain through testimony in another hearing. However, Bain's testimony in this case was consistent with her prior testimony in that case as it relates to King. King did not testify in the prior case. Thus, there are no findings of fact other than what was testified to in this case.

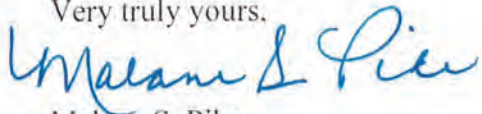
The bottom line here is that the OGC's case against Slayman has been seriously maligned by the credibility issues of its witnesses. These issues cannot be glossed over or ignored. On the other hand, Slayman had a host of witnesses, two of which were former employees of Slayman, who testified that they had never witnessed this type of behavior. There were no credibility issues with Slayman's witnesses. Based on this, my recommendation remains the same – that the action against Slayman be dismissed.

I would strongly recommend that the Board read this transcript in its entirety before making a decision in this matter. I will amend my report in the next few days to reflect certain matters contained herein and I will redistribute to the parties.

Thank you for the opportunity to provide this response. I will be happy to answer any questions you may have and can be available at the Board meeting if needed.

Ms. Del-Gratia Jones, Chair
May 29, 2019
Page Eleven

Very truly yours,



Malane S. Pike
Hearing Officer

cc: Scott Winburn, Esquire
Shannon Polvi, Esquire

MALANE S. PIKE

Attorney at Law

Post Office Box 729 White Rock, South Carolina 29177 (805) 622-1495

VIA CERTIFIED MAIL AND EMAIL

April 19, 2019

Shannon Polvi, Esquire
Cromer Babb Porter & Hicks, LLC
PO Box 11675
Columbia, SC 29211

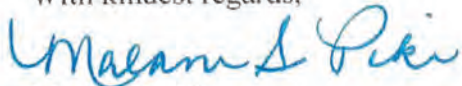
E. Scott Winburn, Esquire
S.C. Department of Education
1429 Senate Street
Columbia, SC 29201

RE: In the Matter of Agnes M. Slayman
Educator Certificate #134958

Dear Ms. Polvi and Mr. Winburn:

Enclosed please find the Hearing Officer's Report and Recommendation in the above referenced matter. If you object to this report, please provide me with your written objections no later than close of business on Friday, April 26, 2019. I will consider any objections made and submit a final report to the State Board of Education for consideration at the next meeting. The South Carolina Department of Education will notify you with regard to date, time, and place of this meeting.

With kindest regards,



Malane S. Pike

Enclosure

**STATE OF SOUTH CAROLINA
STATE BOARD OF EDUCATION**

In the Matter of Dr. Agnes Slayman)	HEARING OFFICER'S REPORT AND RECOMMENDATION
)	
Certificate #134958)	
_____)	

STATEMENT OF THE CASE

This is a matter of alleged unprofessional conduct in the nature of workplace harassment and intimidation of employees. SCDE is requesting that disciplinary action be taken against Dr. Agnes Slayman's (Slayman) educator certificate pursuant to S.C. Code Ann. §59-25-160 (2004). Pursuant to S.C. Code Ann. §59-25-170 (2004), the South Carolina Department of Education notified Slayman of potential disciplinary action against her teaching certificate and informed her of her right to a hearing via letter dated March 28, 2018, sent Certified and Regular Mail. Slayman timely requested a hearing and such was held over a period of five (5) days on October 3, 2018, October 4, 2018, October 12, 2018, November 1, 2018, and November 2, 2018 at the SCDE offices located at 1429 Senate Street, Columbia, South Carolina. Slayman requests that no disciplinary action be taken against her certificate in that the allegations are untrue.

This matter is properly before the South Carolina Board of Education ("State Board") pursuant to S.C. Code Ann. §59-25-150 (2004). It was referred to a hearing officer pursuant to S.C. Code Ann. §59-5-70(B) (2004).

After considering the evidence presented and the testimony of the parties and witnesses, it is recommended that the State Board dismiss this action against Slayman's teaching certificate #134958 for the reasons stated below.

APPEARANCES

On behalf of SCDE:

Scott Winburn, Esquire
Holly Hadden, Esquire
Katie Nilges, Law Clerk
Tracy Moore, Paralegal
Sara Brakmann, Law Clerk
Taylor Yarnel, Intern
South Carolina Department of Education
Office of General Counsel

Ken Puett, Chief Information/Security Officer
South Carolina Department of Education

Dr. Charles King, Witness
Former Assistant Superintendent for Instruction
Chester County School District

Leonard Jeffers (Jeff) Gardner, Witness
Former Assistant Superintendent for Operations
Chester County School District

Shawn Williams, Witness
Former Chief Human Resource Officer
Chester County School District

Brooke Clinton, Witness
Former Public Information Officer
Chester County School District

Anna Stroud, Witness
Former Director of Finance
Chester County School District

Carol Jean Ligon, Witness
Executive Director of Special Services
Chester County School District

On behalf of the Chester School District:

J. Alexander Sherard, Esquire

On behalf of Dr. Slayman:

Shannon Polvi, Esquire
Cromer, Babb, Porter & Hicks, LLC

John Mark Stiver, Witness
Consultant hired by Chester County School District

Sandra Stroman, Witness
Former member of Chester County School Board

James E. Stroman, Witness
Former member of Chester County School Board

John Agee, Witness
Fire Chief in Richburg

Cyrus Corbett, Esquire
Attorney for John Agee

Bill Bundy, Witness
Chester Health Care Foundation

Robert Allen Teal, Witness
Consultant for Chester County School District

Charles Gerald Moore, Witness
Consultant for Chester County School District

Dr. Jimmy Littlefield, Witness
Consultant for Chester County School District

Rev. William Stringfellow, Witness
Former member of Chester County School Board

Maggie James, Witness
Current member of Chester County School Board

Callie McConnell, Witness
Former Administrative Assistant to Slayman
Chester County School District

Dr. Angela Bain, Witness
Current Superintendent
Chester County School District

Dr. Agnes Slayman, Witness
Former Superintendent
Chester County School District

FINDINGS OF FACT

Having observed the witnesses and exhibits presented at the hearing, I make the following Findings of Fact:

1. Slayman holds a valid South Carolina professional educator certificate and has over thirty-two years of experience. She has no prior record of disciplinary action with the State Board. She

holds a Bachelor's, a Master's and a Doctoral degree, all conferred upon her by the University of South Carolina. Her past educational experience includes being a special education teacher, a high school assistant principal, a high school principal, Kershaw School District Assistant Superintendent for Curriculum and Instruction, and Chester School District Superintendent.

2. Slayman was employed in the Kershaw School District for over 20 years. She was the first female high school principal in the history of that district.

3. Slayman was employed with the Chester County School District (District) as the Superintendent in January 2012 and served in that capacity until her resignation on September 24, 2015.¹

4. Throughout her tenure with the District, she received various honors, awards, and accolades for her innovative methods of bringing the District into the twenty first century and for bringing additional money into the District. Some of those included:

a. Slayman received the Superintendent of the Year Award from the S.C. Career and Technology Education Association for the 2012-2013 school year.

b. For 2012, Great Falls Elementary was selected as a Pathfinder School.

c. For 2013, Slayman and the District were named a Duke Energy Power Partner.

d. For 2013, the District was named a Microsoft Alliance Partnership. The District was the only one named in the Southeast and only one of 12 in the United States.

e. In 2013, Slayman was invited to be a speaker at the Microsoft Mobility Conference in N.Y. This conference was attended by business and educational leaders from around the world.

f. In 2014, Slayman was nominated for the S. C. Superintendent of the Year.

g. In 2014, Slayman was named Educator of the Year by the S.C. Resource Officers Association.

h. In 2014, two high schools in the District were named Bronze Schools by U.S. News and World Report.

i. In 2014, Slayman was selected to serve on an international panel for Microsoft's Global Forum, to speak about the infusion of technology into education.

¹ The School Board voted 4-3 to accept Dr. Slayman's resignation.

- j. In 2014, Slayman was one of 120 superintendents from across the U.S. invited to attend President Obama's White House ConnectED Superintendent Summit to discuss advancing education and advancing students across the U.S. through academics.
- k. In 2015, Slayman was recognized by the Martin Luther King Celebration Committee as the Grand Master of the parade. She was the first superintendent to be given that honor.
- l. In 2015, Slayman was nominated by the school board, the CEO's from business and industry, and the legislative delegation for Chester, Fairfield and Cherokee Counties for the S.C. School Administrators' S.C. Superintendent of the Year award.
5. On or about August 2015, Anna Stroud (Stroud), then Director of Finance, called Dr. Rick Hughes (Hughes), a District School Board member (Board), to advise him that Slayman's senior staff members intended to file a grievance against her. Hughes maintained the confidentiality of his informant and the other grievants. Thus, the other Board members were not aware who the grievants were.
6. Attorneys for the Board were contacted and the Board authorized an investigation to be done. At this point, nothing in writing had been submitted by the grievants and the Board was acting on the verbal communication between Stroud and Hughes.
7. Betty Bagley (Bagley) was hired to conduct the investigation. She was instructed by the Board that her investigation was restricted to interviews with the five senior staff members as well as Slayman and Slayman's administrative assistant. The Board, other than Hughes, did not know at this time that the five senior staff members were the grievants, but directed Bagley to interview them in that those were the people who worked closest with Slayman. A very short time frame was given for this investigation and Bagley was instructed not to prepare a written report, but to verbally report her findings to the Board. Bagley made written notes of the interviews she conducted and these later became known as the "Bagley Report". Bagley delivered an oral report to the Board on September 3, 2015. Bagley did not testify at Slayman's disciplinary hearing, however her notes (i.e. the "Bagley Report") were entered into evidence.²
8. During Bagley's interview with Slayman, Bagley asked Slayman if she would resign. Slayman told Bagley that she would not. There is no testimony in the record that suggests that Bagley was authorized to request Slayman's resignation. Slayman was never again asked to resign.
9. A written letter, dated September 8, 2015, addressed to the Board Chair, Denise Lawson, and signed by each of the five senior staff members was filed with the Board. Those senior staff members were:

Dr. Charles King, former Assistant Superintendent for Instruction
Leonard Jeffers Gardner, former Assistant Superintendent for Operations

² See Petitioner's Exhibit 14

Shawn Williams, former Chief Human Resource Officer
Brooke Clinton, former Public Information Officer
Anna Stroud, former Director of Finance

The letter read as follows:

We are formally filing an official grievance due to a hostile work environment, implications of ethical violations, and racial and threatening remarks by Dr. Agnes Slayman, Superintendent of the Chester County School District.

We are requesting a closed door meeting of the Board as a group to present our concerns to the Board of Trustees. We respectfully request that Dr. Slayman not be in attendance during this meeting.

(See Petitioner's Exhibit 8).

10. On September 21, 2015, the five grievants were allowed to express their grievances regarding Slayman to the Board in executive session. Slayman was not present.

11. Slayman voluntarily resigned thereafter without the Board ever taking any formal action against her. She and the Board entered into an agreement whereby Slayman was brought back as a consultant until June 30, 2016. The majority of the Board did not believe the claims being made against Slayman and wanted to vote that the claims had "no merit". However, the Board was strongly advised that they should vote that the claims were "moot" because Slayman had resigned.

12. Slayman resigned because she felt that she would not be able to supervise the grievants in the future or provide direction to the District in that her actions would constantly be questioned.³

13. By letter dated October 14, 2015, SCDE received notice of Dr. Slayman's resignation and the allegations of the five employees. This letter was sent by the Interim District Superintendent, V. Keith Callicut, Ph.D (Callicut) pursuant to Regulation, R. 43-58.1. The school board did not vote on this action and was not aware that Callicut had sent the letter to SCDE. Thereafter, SCDE initiated an investigation into this matter which ultimately culminated in the five day hearing from which this recommendation is being written.

14. The events of this matter were chronicled in news reports and in postings on social media. The "Bagley Report" was anonymously leaked to the press. Slayman and the Board members were followed and continually harassed by the press and others.

15. Slayman has been unable to obtain employment since her resignation. Slayman was also harmed in that she did not get to complete her TERI and had to begin drawing retirement.

³ Tr. p. 1340, L. 5-9

16. The five grievants testified at the hearing. A summary of important facts about each of them as well as the allegations made by each is found below. Please note that the allegations referenced below are not findings of fact that the allegations are truthful, but rather, are findings of fact that these allegations have been made against Slayman.

Dr. Charles King (King)

17. King was hired by Slayman in July 2012 to work for the District as the Assistant Superintendent of Instruction. He reported directly to Slayman. Prior to this, King and Slayman had a long working relationship with each other in Kershaw County, spanning approximately 20 years, some of which involved King working directly for Slayman. When Slayman applied for the position of Superintendent in Chester, King wrote a recommendation to the Board in support of Slayman for this position.

18. In the Summer of 2015 just before the grievance was filed, Slayman discovered that King was using the District's Mi-Fi at home because he did not have internet service there. He was not authorized to use it for that purpose and Slayman made him return it. King became upset over this.⁴

19. King continued to work for the District after Slayman's resignation until April 2016. At that time, King was supervising an employee's administrative certification through Western Governor's University. As such, he was required to observe her and document her work to the University. He allowed this employee access to the portal where his documentation was to be placed. The employee, in turn, completed the documentation in King's name and submitted such to the University. He initially denied giving the employee access but was confronted with an email proving that he had provided such access. He left the employ of the District as a result of this matter and the matter was reported to SCDE.⁵

20. King aspired to be a school superintendent and applied for superintendent positions but was not hired. He was briefly appointed as Interim Superintendent in Chester until Callicut was hired and again, just before Dr. Angela Bain (Bain) was hired. He is currently employed as a principal at Midway Elementary School in Kershaw County.

21. In testimony at the hearing, King alleged the following:

- a. Slayman would summon him to meetings irrespective of other meetings he may be participating in.
- b. Slayman allowed her "breakfast group", composed of the fire chief, the coroner, and numerous other individuals, to influence her decisions with regard to the District.

4 Tr. p. 1250-1252, L. 18-4

5 Tr. p. 1089-90, L. 4-19; p. 1130-1131, L. 10-16

- c. At an administrator's retreat, Slayman, in a very loud and boisterous tone with her finger pointed at him, chastised and chided him in front of almost the entire cadre of principals.⁶
- d. Slayman did not support the newly elected sheriff and did not agree with him coming into the schools to point out security deficiencies. As a result, she endorsed the hiring of a security chief and contracting with a private security agency to provide security to the schools as a replacement for the School Resource Officers (SRO's).
- e. Slayman was not truthful with the school board in that she did not advise them that the private security agency did not have arrest powers and she led them to believe that the officers present at a luncheon announcing the replacement of the SRO's were the actual officers who would be placed in the schools.
- f. He observed aggressive behavior on the part of Slayman. To wit, he heard Slayman state "I will kill that son of a bitch" referring to Rick Hughes, then school board member; "I will rip your throat out" referring to Williams; "I will cut your knees out from under you if you do this again", referring to Gardner.
- g. He was sent by Slayman to conduct an investigation of an alleged illicit affair between the cheerleading coach and the new sheriff. In doing this, King had to question some of the cheerleaders. The coach ultimately resigned.

22. King never attempted to talk to Slayman about any comments she made to him, however, he suggested to her that she may have been a bit strong with others.

Leonard Jeffers Gardner (Gardner)

23. Gardner was the principal of Chester High School at the time Slayman was hired. She promoted him to Assistant Superintendent of School Operations in August 2012 and he held this position until his TERI ended in 2018. During this period, he was over Food Service, Attendance, Transportation, Maintenance, Athletics, IT, Security, and Building and Construction Projects. He is currently employed with the Chester County Career Center as a Carpentry Instructor.

24. Gardner orchestrated the filing of the letter of grievance.⁷ At or about the time that the letter of grievance was being drafted in 2015, Gardner opted to retire and go on the TERI program. Prior to that, Slayman had raised concerns with him about his work performance in that his work was not being completed in a timely fashion. Angela Bain (Bain), the Administrator succeeding Slayman, also raised similar concerns with him during her tenure as superintendent, as well as various Board members and consultants.

⁶ In further testimony, King admitted that this conversation occurred outside of the meeting room and only four or five principals witnesses it. (Tr. p. 35-38, L. 22-9)

⁷ Tr. p. 219, L. 7-25; p. 128-129, L. 18-2

25. Gardner was a contender for the job of District Superintendent when Slayman applied. However, Gardner was given only a courtesy interview in that he was unqualified for the job.

26. In testimony at the hearing, Gardner alleged the following:

- a. Slayman made threatening comments such as "cut your throat out"; "kill you" and referred to the fact that she had a CWP because she was afraid of the politics in that area.
- b. Slayman forbade him from speaking to the new sheriff and the county supervisor. In addition, the SRO's did not have access to school cameras or keys to school buildings.
- c. Gardner was left out of meetings involving his areas of responsibility but was later berated for not knowing what was going on in that area. He was told by Slayman that he would go down along with Dr. King and herself.
- d. Slayman was paranoid about making decisions. As a result, she would make decisions and then change them multiple times.
- e. Slayman instructed Gardner to tell the school Board that the officers from the private security firm present at a luncheon announcing the replacement of the SRO's were the actual officers who would be placed in the schools, when, in fact, they were not. He was also instructed not to advise the Board that the private security firm did not administer first aid or CPR.
- f. Slayman made racial comments to the effect that the criteria for the security officer assigned to Louisville Elementary School was that he be white. Slayman also made a racial comment about Idaho being "Heaven, man, Heaven" in that it was 95% white.
- g. Slayman berated Dr. King in front of principals and administrators at a retreat. This incident involved shaking a finger in his face.
- h. Slayman instructed Gardner and King to get rid of a cheerleading coach who was allegedly having an illicit affair with the newly elected sheriff. Gardner was not comfortable with this in that he and King were interviewing students about this and the students were becoming upset. As a result of the interviews, it appeared that this may have been the product of a false rumor started by a cheerleader who was not pleased with her placement on the squad. The cheerleading coach opted to resign her position in that she felt she could no longer be effective.
- i. In response to a situation where three bus drivers requested a meeting with Slayman regarding a raise, Slayman later met with the supervisor of the bus drivers and told her "if I find out that you sent those bus drivers over here, I'll have your job for

inciting a riot.”

j. Slayman told Shawn Williams in a cabinet meeting that she would cut her throat out.

27. Gardner did not discuss any of the above allegations with Slayman prior to instigating the letter of grievance.

28. Gardner frequently complained about others that he worked with to Slayman, such as Anna Stroud and Shawn Williams. In addition, King and Gardner frequently approached Slayman individually encouraging her to reorganize the District Office to give that individual more power.

29. Slayman’s remarks about having a CWP were made in a conversation with several people, including Gardner, about home security. Slayman was asked if she could ever use it. She responded that she could if she felt threatened in her home.⁸

30. Slayman is Hispanic and denies making any racial comments. Slayman’s comments were that there were no people when she got off the plane.⁹ She also discussed her Idaho trip with Board Member S. Stroman whose testimony corroborated this account. See below.

31. Slayman informed the Board members that the Defender officers present at the “meet and greet” may not be the same officers assigned to the schools. She also informed the Board that Defender did not have arrest capabilities. The testimony of the Board members corroborates this. See below. However, the Defender officers had not been fully staffed at the time of the “meet and greet” was due to Gardner’s failure to complete the task.

32. Slayman denies instructing Gardner and King to get rid of the cheerleading coach. A distraught parent along with her distraught daughter came to Slayman’s office to report that the cheerleading coach was using the students to cover for her sexual rendezvous and taking the students to locations to meet with this individual. The parent and the daughter were in Slayman’s office when she assigned the task to Gardner and King to meet with the principal and interview the students. Slayman only had one side of the story and she asked Gardner and King to “find out what was going on”.¹⁰

33. Gardner had strong connections to Hughes in that Hughes was the baseball coach for Chester High School when Gardner was the principal of that school.¹¹

Shawn Williams (Williams)

34. Williams was the Director of Human Resources (later renamed the Executive Director of

⁸ Tr. p. 1278-1279, L. 11-20

⁹ Tr. p. 1322-1324, L.24-1

¹⁰ Tr. p. 1283-1284, L.8-24; p. 1355-1356, L. 5-5

¹¹ Tr. p. 1391, L. 20-24

Human Resources) in the District from July 2011 until June 2016. Thus, Williams was employed with the District for the entirety of Slayman's tenure as superintendent.

35. In testimony at the hearing, Williams alleged the following:

- a. On August 19, 2013, Williams thanked Board Members for participating in the new teacher orientation. The next day in a cabinet meeting, Slayman told Williams that she would slit her throat if she ever spoke to the Board members again. Williams left the meeting and reflected on the statement. She later went back to Slayman and discussed that she felt the statement was a threat. Slayman apologized and told her that she did not mean it that way. Slayman never made such a statement to Williams again.
- b. Williams heard Slayman tell other people that she would crucify them, rip his/her throat out, and kill them. Williams does not believe that she intended to do such things but nonetheless used this type of intense language.
- c. Williams acknowledged that it was a very tense time in the District with the SRO/private security transition.
- d. Certain principals expressed concerns to Williams that Slayman had told them she would kill them if they talked to anyone about the school security issue.
- e. Slayman had an open door policy but employees did not feel comfortable going to her.
- f. Slayman would be "the nicest person ever"¹² on one day and then be upset the next.
- g. Slayman's threatening comments exhibited a level of frustration and anger.
- h. The "breaking straw"¹³ for Williams was the racial comment about Idaho being Heaven. Williams did not hear this comment personally but was relying on information provided to her by Gardner.

36. Williams is currently employed with Richland School District 2 as the Chief Human Resource Officer. She was also employed in Orangeburg after leaving the District.

37. Slayman denies making the statement that she would slit Williams' throat. She admits making a remark to Williams to the effect of "I'll have to kill you". However, this remark was made in the vernacular and not meant as a threat. When Williams later advised Slayman that the remark was offensive and that she interpreted it as a threat, Slayman apologized and never made

¹² Tr. p. 301, L. 2-3

¹³ Tr. p. 268, L. 18-22

such a comment to Williams again.¹⁴

Brooke Clinton (Clinton)

38. Clinton was the Public Information Officer for the District. She was hired by Slayman shortly after Slayman's employment with the District and remained after Slayman's departure. Clinton left the District in April 2016 and is currently employed with the Chester County Chamber of Commerce.

39. Clinton was not a part of the original group that verbally complained about Slayman. She was later drawn into signing the grievance after conversations with the other complainants and reading the "Bagley Report".

40. In testimony at the hearing, Clinton alleged the following:

- a. Slayman would tell them one thing in the morning and change her mind by the afternoon. She frequently elevated matters to crisis stage when, in fact, the matter was not a crisis.
- b. Slayman's decisions were based on emotion and not rational behavior which could have put school children in danger. An example of this was that Slayman refused to allow SRO's to view live camera feeds from the schools in that this would be giving the sheriff that access. Clinton believed that this decision was based on Slayman's dislike of the sheriff and not the safety of the school children.
- c. Slayman always provided professional support when Clinton needed it in her position (e.g. with wording or getting additional information from other sources).
- d. Slayman "could hold you on a hook and scare you".¹⁵ As an example, Clinton relayed an incident in which Slayman sent her an email stating that she was really upset with her. Clinton could not get access to Slayman that day and was distressed regarding what the issue was. The next morning, she met with Slayman who advised her that she expected Clinton to produce correct work and that Clinton had misspelled a word. Clinton produced evidence to Slayman that her spelling was correct in that the word had an American and an English spelling. Slayman was then fine.
- e. Clinton's most stressful event was the incident between Williams and Slayman. Slayman told Williams that she should not have spoken to the Board. She further told Williams, "I will slit your throat if you ever do that again."¹⁶
- f. Slayman used a lot of threatening language but she would use it in different ways. She

14 Tr. p. 1264, L.19-22; p. 265, L. 6-11

15 Tr. p. 325, L. 24-25

16 Tr. p. 328, L. 15-18

would commonly use it in a joking manner (e.g. "I'm gon' kill you" ¹⁷). However, she could also use it when she was agitated (e.g. "I'll crucify him"¹⁸).

- g. This type of language was a part of Slayman's vernacular. She would tell Clinton, "take this to your grave or I'll, you know, kill you if you say it".¹⁹ Clinton never interpreted this as a threat in the way that she interpreted Slayman's statement to Williams.
- h. There were comments reported in the "Bagley Report" that Clinton had never heard.²⁰
- i. Clinton's decision to sign the grievance hinged on her learning "the depth of what was happening to some of the other senior staff members".²¹

Anna Stroud (Stroud)

41. Stroud began working for the District in 2001 as an accounting supervisor and retired from the District as the Executive Director of Finance. Her position was eliminated by the Board at the end of her TERI in May 2017. She is currently employed with an accounting practitioner in Chester.

42. Stroud's husband was a past SRO in the District and she had strong ties to the newly elected sheriff.

43. Stroud also had strong ties to Hughes, a board member who did not favor Slayman. Hughes had been her son's coach and also served as her son's emergency contact when it was discovered that he had a heart ailment.

44. Stroud's lack of education and credentials to perform her job as Director of Finance had long been a point of contention with the Board. Stroud only possessed an Associate degree. The Board froze her salary until such time as she completed certain financial courses. This was done prior to Slayman's employment with the District. In the summer of 2015, Slayman discovered that Stroud had been giving herself raises each time the school employees were voted a raise but had failed to complete the requisite financial courses. Slayman confronted Stroud about this prior to the filing of the grievance.

45. Slayman was asked by the Board to terminate Stroud but Slayman argued against that in order to allow Stroud to complete her TERI.

47. It was Stroud who contacted Hughes to complain of the hostile environment created by Slayman.

17 Tr. p. 329, L. 11-15

18 Tr. p. 329, L. 18-20

19 Tr. p. 331, L. 5-7

20 Tr. p. 360, L. 9-13

21 Tr. p. 336-337, L.24-3

48. In testimony at the hearing, Stroud alleged the following:

- a. Slayman dispensed with a dual enrollment agreement with York Technical College and increased the District's relationship with USC Lancaster. Stroud alleged that this did not benefit the children in that it lessened the number of courses that were available for the children toward a college degree while in high school.
- b. Stroud was never given a copy of the Defender Contract (the contract for the new school security officers) in that Slayman wanted to keep the terms close to the vest. All other District contracts were kept in the Finance office.
- c. Stroud was concerned for her child's safety under the new security officers.
- d. Slayman became concerned that one of her senior staff had leaked confidential information. She lined them up and asked each one of them "Did you tell?"²²
- e. Slayman told her senior staff that she would cut their knees out from under them if they told certain things.
- f. Slayman was constantly finding or creating problems that were not factual about Stroud's job performance and about the Finance Department.
- g. Slayman frequently summoned her senior staff to her office because something was wrong or someone had done something.
- h. Slayman told Williams that she would cut her throat out.
- i. Slayman told the senior staff that if they talked to a board member, she'd fire them.
- j. Slayman told the Board that the security officers could carry guns and make arrests when, in fact, they did not have that legal authority.
- k. Slayman would not work with the new sheriff to provide active shooter training.

49. Active shooter training was provided by the sheriff.²³ In addition, there was also training for first responders. The sheriff was invited to this but did not attend.²⁴

Jeanne Ligon (Ligon)

50. Ligon, a school psychologist and the executive director of special services for the District,

22 Tr. p. 387, L. 15 -18

23 Tr. p. 1409, L. 16-21

24 Tr. p. 1404-1405, L. 5-11

testified on behalf of SCDE. She was not a member of Slayman's senior cabinet. She never witnessed the events described by the five complainants. She claimed to have heard senior cabinet members being summoned to Slayman's office by Slayman calling out their first name, however, several other witnesses disputed this in that the positions of the offices would not have allowed this.

51. To counter the above allegations, Slayman produced the testimony of four (4) school district members, four (4) consultants hired by the District, the current school superintendent who replaced Slayman, Slayman's administrative assistant, and two other people who had significant dealings with Slayman. The significant points of this testimony are found below.

Consultants on Behalf of Slayman

52. The four (4) consultants testifying on behalf of Slayman were:

John Mark Stiver (Stiver)
Robert Allen Teal (Teal)
Charles Moore (Moore)
Dr. Jimmy Littlefield (Littlefield)

53. All four consultants found Slayman to be extremely professional and never witnessed the behaviors described by the five senior staff members.

54. Both Stiver and Teal worked under Slayman's supervision in the Kershaw School District. Slayman was always pleasant and professional. Neither had any experiences with Slayman similar to the allegations of the five complainants. Neither saw any evidence of a hostile environment in their work as a consultant with the District or evidence of low morale.

55. After retirement, Stiver became a technology consultant and contracted with the District during Slayman's tenure. Having worked with King, Gardner, and Stroud during the contract period, it was his observation that all three had problems managing their assigned responsibilities.

56. Teal had 22 years of association with Slayman. Their last task together in Kershaw was a comprehensive Title 9 audit complaint. This required that they spend a very large amount of hours together. Slayman never exhibited harmful, negative, or hostile behavior. Every association with her was professional.²⁵

57. Moore, another consultant, was hired by the District to do a salary study. After working with Stroud, he had concerns about her abilities. His study advocated the hiring of a CFO.

58. Moore read the Bagley Report and concluded that somebody conspired to damage Slayman. He never experienced any of the behaviors Slayman was accused of. The content of the Bagley Report ruined his positive feelings for Betty Bagley.

25 Tr. p. 749-751, L. 11-25

59. Littlefield was also a consultant in the District. Slayman requested that he analyze her budget in an effort to find money to train the District's reading specialist. Prior to his consultancy business and his retirement, Littlefield was a District Superintendent in Spartanburg for 23 years. Littlefield found Slayman to always be professional. In his words, "She knew what she wanted for the District and what she needed from other people to move the District along".²⁶ Having been a superintendent for so long, he could sense the environment by his interactions with the people employed there. His sense of the District office was that the environment and the morale were good.

60. Littlefield also addressed the need for a superintendent to have communication with the surrounding community. As superintendent, Slayman worked at the pleasure of the school board, who was elected by the community. Thus, she needed to know the pulse of the community to deal with issues in the District. Also, the superintendent should be the only person who should be communicating with the school board in an official capacity.

School Board Members on Behalf of Slayman

61. Four members of the school board testified on behalf of Slayman. Those members were:

- a. **Sandra Stroman (S. Stroman)** – School Board member from 2014 to 2017, which encompassed the filing of this grievance and Slayman's resignation.
- b. **James Stroman (J. Stroman)** - husband of S. Stroman - School Board member when Slayman was hired – left position in 2014 to become member of State Board of Education.
- c. **Rev. Bill Stringfellow (Stringfellow)** – School Board member for 28 years - He rotated off the Board in December 2014 after being defeated by Hughes and just before the allegations involving Slayman arose.
- d. **Maggie James (James)** - School Board member from 1993 to 2007, and again from 2011 to present. She was on the School Board throughout Slayman's tenure with the District.

62. The testimony of these Board members is important in that they were able to explain the events that transpired during this period and put into perspective many of Slayman's actions that the grievants complained of.

63. The following represents a synopsis of the testimony that was common to most or all board members:

- a. Slayman's interactions with the Board were always professional and cordial and

²⁶ Tr. p. 815, L. 11-14

Slayman's interactions with her staff always appeared to be professional and cordial. Slayman was an outstanding leader of the District. She was innovative and brought technology to the forefront in that county. The Board was very pleased with her.

b. The Board members as well as other witnesses expressed disbelief that behavior of the nature expressed by the five complainants could exist without the knowledge of others. Chester is a small community and each of these Board members have strong ties to that community. For example, S. Stroman taught in 3 schools in that community for over 25 years; has friends on Slayman's staff and in the schools; attends the largest church in Chester; and her husband, J. Stroman, is a previous Board member. Neither she nor her husband heard of any problems regarding Slayman. Conversely, the Board heard immediately about problems with a prior superintendent.

c. The Board, as a body, never voted to terminate Slayman.

d. Slayman was very good at keeping the Board advised of what she was doing and how she was doing it. She made personal telephone calls to each of the Board members as opposed to sending emails or text messages.

e. Members of Slayman's senior cabinet regularly addressed the Board members throughout Slayman's tenure with the District.

f. The issue of security in the District's schools had been an issue for many years prior to Slayman's tenure with the District. At the time of the Sandy Hook incident, the District only had four School Resource Officers (SRO's) serving nine schools. The elementary schools had no SRO's. If there was an accident on the interstate, the SRO's were subject to being called by the sheriff to go to the accident, thus leaving the schools with no security. Another determining factor was that the County had advised the District that it could no longer fund a part of the SRO's salary and the District could not afford this additional cost. The Board determined that Defender was a cost effective means of providing the needed security to all the schools. It was a Board decision to contract with Defender and to have that contract remain confidential.

g. Slayman advised the Board that officers at the "meet and greet" may not be the permanent officers. The Board was also aware that Defender did not have arrest powers. However, there was nothing to prevent law enforcement from being called.

h. Board members noted various problems with members of Slayman's staff as follows:

1) Slayman promoted Gardner to the District office but he struggled in that role. He had difficulty getting tasks completed and it appeared that he could not handle the position. He came across as weak minded and did not want to obey authority.

2) Gardner applied for the Superintendent position at the same time as Slayman. He was given a courtesy interview but was never really considered for the position

because he was not qualified.

- 3) Shroud was not qualified for the job she held and could not seem to provide the school board members with the information that they wanted and needed. When asked by Board members to report on how much money the District had in various funds, she could not do so.
- 4) Shroud was instructed by the Board to obtain the necessary educational requirement for her job and was given a time frame in which to do it. Her salary was frozen until such time as she met the Board's requirements.
- 5) Clinton did not display good attention to detail in that she would send documents out with grammatical errors in them.
 - i. The filing of the grievance against Slayman appeared to be politically motivated.
 - j. The investigation conducted by Betty Bagley into the allegations against Slayman and the resulting "Bagley Report" did not produce reliable information.
 - k. Dr. Callicutt, the interim superintendent, never informed the School Board that he was going to notify the State Board of the Slayman matter. The Board members were surprised by his actions and felt that they should have been notified of this prior to him taking action.

64. Stringfellow is a pastor and a lifetime resident of Chester. He was on the School Board for 28 years. He has numerous family members employed in the District's schools and is very well known in the Chester community.

65. Stringfellow was in and out of the District office almost every day. He never witnessed evidence of a hostile environment nor did he ever hear of any complaints against Slayman relating to a hostile environment or otherwise. Stringfellow had worked with many past superintendents in the District and he felt that the morale in the District office during Slayman's tenure was the highest he had ever seen it.²⁷

66. Stringfellow observed that Slayman was a superintendent with leadership skills and she demanded that her employees do their job. He also observed that some employees were not doing their job.²⁸

67. Stringfellow was aware that there was tension between the new Sheriff and Slayman. Stringfellow was aware of instances in which the sheriff was disrespectful to Slayman.

68. James asked that the Board limit Bagley's investigation to senior staff members to prevent

²⁷ Tr. p. 860, L. 9-15

²⁸ Tr. p. 846, L 4-8

unnecessary chaos in the District and because she felt that senior staff would know. She did not know at that time that senior staff had filed the grievance.

69. Hughes began his term on the board in January 2015 and the decision was made by the Board to replace the SRO's with a private security firm in April 2015. Hughes was also the doctor for the jail and thus worked with the sheriff. The sheriff was not in favor of the plan to replace the SRO's in that he would be losing the use of those officers.

70. Slayman had a conversation with S. Stroman about her trip to Idaho. The comments were that Idaho was sparsely populated with vast territory; the air was clean; and the sky was beautiful. As such, it was close to Heaven. S. Stroman concluded that the allegations made by Gardner were taken out of context.²⁹

Slayman's Administrative Assistant on Behalf of Slayman

71. Callie McConnell (McConnell) was Slayman's administrative assistant in the District. Her office is adjacent to the superintendent's office and she interacted with Slayman daily. She had a good rapport with Slayman and enjoyed working for her.

72. McConnell's opinion of Slayman as superintendent of the District is as follows:

...she's very knowledgeable about the job that was to be done. She was careful about the children, you know. She wanted the best for the children. And actually I felt, you know, she was really putting us on the map, 'cause Chester was so small, you know. But and she was bringing a lot of the technology. She brought a lot of that into play. She made it so that students could get access to tablets, computers, you know. And as I say, you know, she was good with the children, the parents, you know. She always tried to – if parents had problems, she would try to work them out, you know. I thought she did an exceptional job ...³⁰

73. McConnell never heard Slayman yell at anyone nor did she ever observe Slayman making racial or threatening remarks. Further, she did not hear anyone say that Slayman had made threatening remarks to them.

74. Slayman hired more African American people into administrative positions than any of the other superintendents that McConnell has known.

75. McConnell was interviewed by Betty Bagley for approximately 8 to 10 minutes. McConnell's comments were all positive with regard to Slayman. When the Bagley Report was later published, McConnell saw that it contained no references to her comments about Slayman.

29 Tr. p. 543-544, L. 9-18

30 Tr. p. 1002-03, L. 20-9

76. McConnell never observed Slayman misleading the Board in any way.

77. McConnell was familiar with the circumstances regarding the activities of the cheerleading coach that Slayman requested King and Gardner investigate. A parent reported to Slayman that the cheerleading coach wanted her daughter to cover for her while she met the Sheriff. The parent was disturbed about these facts and provided a written statement with regard to the matter.

Others Who had Dealings with Slayman

78. John Agee (Agee) was the originator of the "breakfast club", a group of residents who congregated at a local restaurant for breakfast. Slayman frequently joined them for breakfast. The "breakfast club" was open to anyone who wanted to sit with Agee and have breakfast.

79. The conversation at the breakfast club centered around community matters but was mostly about the fire service because Agee was chief of the fire service.

80. Slayman did not share any confidential information about the District during these breakfasts. Nor did she solicit guidance from the "breakfast club" on District matters.³¹

81. Slayman was very supportive of the fire service. She invited the fire service to participate in security training put on by the District. This was the first time that the fire service had ever been asked to participate in such events with the District and it was much appreciated by Agee and the fire service.³²

82. Slayman's relationship with community organizations was excellent. She did not just go – she participated.³³

83. Agee's observations of Slayman were nothing but professional. He never observed Slayman yelling at anyone or threatening anyone. Further, he never heard any rumors of a hostile work environment during Slayman's administration.³⁴

84. Bill Bundy (Bundy) is president of the Chester Health Care Foundation and chairman of the District's Public Education Foundation. Slayman solicited funds from Bundy for mini-grants and scholarships. She obtained \$150,000 over time for various school programs. Bundy interacted with Slayman weekly with regard to these various matters.

85. Bundy found Slayman to be professional with a great deal of integrity.³⁵ Bundy saw no indication of a hostile environment, nor did he ever observe her yelling or threatening anyone.

31 Tr. p. 653-654, L. 25-9

32 Tr. p. 657, L. 12-20

33 Tr. p. 665, L. 15-23

34 Tr. p. 666-667, L. 14-8

35 Tr. p. 709, L. 15-17

APPLICABLE LAW

1. S.C. Code Ann. § 59-25-150 (2004) provides that the State Board of Education may revoke or suspend the certificate of any person for just cause.
2. S.C. Code Ann. § 59-25-160 (2004) defines “just cause”. Section 59-25-160 (4) states that “just cause” may consist of unprofessional conduct.
3. S.C. Code Ann. (Regulations) 43-58 states that the State Board of Education has the legal authority to deny, revoke, or suspend a certificate, or issue a public reprimand for a variety of causes including unprofessional conduct.
4. The standard of proof in a professional disciplinary matter is preponderance of the evidence. *Anonymous (M-156-90) v. State Board of Medical Examiners*, 329 S.C. 371, 496 S.E.2d 17 (1998).
5. “A preponderance of the evidence stated simply is that evidence which convinces as to it truth”. *State v. Scott*, 420 S.C. 108 at 113, 800 S.E.2d 793 at 796 (Ct. App. 2017). Stated differently, the “facts supporting the claim are more probable than their nonexistence”. *U.S. Steel Min. Co., Inc. v. Director, Office of Workers’ Compensation Programs, U.S. Dept of Labor*, 187 F.3d 384 (4th Cir. 1999).

RECOMMENDATIONS

Having carefully considered all the testimony and exhibits, I find that there is insufficient probative evidence to prove the allegations of unprofessional conduct in the nature of workplace harassment and intimidation of employees or on any other basis alleged herein and described below. The evidence presented at the hearing in support of these allegations was the testimony of five employees that comprised Slayman’s senior cabinet.³⁶ This testimony was riddled with statements that were contradicted by the testimony of numerous other witnesses, thereby making the truth and veracity of such highly questionable. Several of these employees were also disgruntled over job performance issues or other issues related to the job, raising further issues of credibility. Tragically, these five individuals put into motion a chain of events that culminated in a media frenzy, marking an end to Slayman’s otherwise unblemished education career.

The bulk of their testimony mirrored each other. Of the allegations made, the ones that would be actionable against Slayman’s certificate can be condensed into the following five categories:

- A. Hostile treatment of the five complainants and others to include intimidation, public degradation, threats such as “I will rip your throat out”, “I will kill you”, “I will cut your legs off” as well as reference to the fact that she had a CWP;

³⁶ Although a sixth employee testified, she could not provide probative evidence as to any of the matters complained of.

- B. Failure to provide adequate security for the schools by hiring Defender Industries to provide such security as opposed to SRO's from the sheriff's office;
- C. Providing false information to School Board members;
- D. Racists remarks; and
- E. Inappropriate discussion of confidential District matters with local "breakfast club" members and adherence to their opinions.

The paragraphs below will examine each of these allegations as well as issues involving the five employees making these allegations.

I. The Allegations

- A. **Hostile treatment of the five complainants to include intimidation, public degradation, threats such as "I will rip your throat out", "I will kill you", "I will cut your legs off"**

This allegation is by far the most serious of the allegations made against Slayman. However, in examining all of the evidence presented, I cannot say by a preponderance of that evidence that this allegation is truthful.

Prior to Slayman's employment with the District, she was employed in the Kershaw School District for over twenty years. Her record there was unblemished and she was continually promoted to higher positions. Two witnesses, Teal and Stiver, worked for Slayman in Kershaw and testified with regard to their experiences with her. Their experience with Slayman was professional and pleasant. Teal spent an extensive amount of time with Slayman while in Kershaw and was adamant that she never exhibited harmful, negative or hostile behavior. Notably, King (one of the grievants) also worked for Slayman in Kershaw. When Slayman offered him a job in the District working for her again, he did not hesitate to take it. Two other consultants for the District and four board members testified that their interactions with Slayman had likewise been professional and pleasant, with no evidence of the behaviors noted above.

The four Board members and the four consultants went on to testify that they had the opportunity to observe Slayman's interactions with her staff and that such interactions were always pleasant. Three of the Board members³⁷ and the four consultants had the opportunity to observe the atmosphere and morale in the District office. They all testified that such was very good. None of these eight people saw evidence of the hostile environment described by the five employees.

Slayman's administrative assistant, McConnell, whose office was adjacent to Slayman's,

³⁷ James Stroman was not questioned with regard to whether he had observed the atmosphere and/or morale in the District Office and thus, did not testify with regard to this matter.

testified that she had a good rapport with Slayman and had never seen these behaviors that the five grievants alleged. In fact, she described the filing of this grievance as a "coup".³⁸

Curiously, the only evidence in the record regarding this egregious behavior is the testimony of the five grievants. Despite the fact that King and Gardner allege that King was berated publicly by Slayman in front of certain principals, those principals were not brought forth to corroborate this behavior. Similarly, Gardner's allegation that Slayman treated the supervisor of the bus drivers in a hostile manner was not corroborated by testimony of the supervisor that purportedly suffered this treatment. It should also be noted that none of the grievants other than Williams (discussed *infra.*) ever approached Slayman regarding any matters that offended them prior to filing this grievance.

It was duly noted by several witnesses that Chester is a small, tightly knit community. As such, it is highly unlikely that knowledge of this type of behavior could be suppressed for three years, especially given the deeply rooted connections of the Board members and the fact that Slayman's purported behavior was not just behind closed doors. Notably, problems with the prior superintendent quickly reached the ears of Board members. This begs the question of why this type of shocking and reprehensible behavior would not have been fodder for discussion all over Chester.

I further place no reliance on the Bagley Report and the conclusions therefrom due to the limited scope of the investigation. The requirements imposed on Bagley's investigation by the Board were that she could only speak to the five grievants as well as Ligon, Slayman, and McConnell and the investigation was to be concluded in a very short timeframe (i.e. a few days). By placing time and scope limitations on Bagley, the Board unwittingly precluded Bagley from arriving at a fair and accurate conclusion.^{39 40} As a result, the report made affirmative conclusions about Slayman's conduct toward her staff with no attempt to verify the truth of the information received, even though, as noted above, some of the alleged acts occurred in front of others.⁴¹ The report also made affirmative conclusions regarding Slayman's treatment of persons other than those being interviewed, without first verifying these incidents with the people involved.⁴² Finally, there is no mention in the report that further investigation was needed or advisable. There was no testimony and no documentary evidence introduced at the hearing to indicate that Bagley went back to the Board to request that the scope of her investigation be expanded to these other parties and there is no evidence that she informed the Board of these shortcomings in her

38 Tr. p. 1009, L. 15-24

39 At the time that Bagley was hired for this assignment, the Board as a whole was unaware of who the grievants were. Thus, my statements regarding the restrictions placed on Bagley are not meant to suggest that the Board's intentions in imposing such restrictions were impure. In fact, the majority of the Board supported Slayman and felt that the allegations were false. The Board was, in fact, attempting to protect Slayman by limiting knowledge that these accusations had been made.

40 Bagley is now employed with SCDE and did not testify at the hearing. However, her "report", which was nothing more than her notes from the interviews, was introduced as evidence and admitted as Petitioner's Exhibit 14.

41 For example, see Petitioner's Exhibit 14, p. 5 at the fourth bullet; p. 7 at the seventh bullet. These incidents could have been corroborated with third parties.

42 See Petitioner's Exhibit 14, p. 3 at first full bullet; p 6 at first bullet and last bullet.

presentation.

Another serious shortcoming of the Bagley Report is that it did not portray all the information that was provided to Bagley. For example, McConnell was interviewed by Bagley but McConnell's comments, which were positive toward Slayman, were not reflected in Bagley's report. This is quite disturbing in that the purpose of Bagley's investigation was for use by the Board in making a determination with regard to serious allegations of misconduct. The fact that McConnell's office was immediately outside of Slayman's door and McConnell never saw or heard the behaviors described by the grievants is a significant fact and should have been reported to the Board. For all the reasons stated above, this report has been given no weight in my recommendation.

While the evidence does not support the behaviors as described by the five grievants, the evidence does support that Slayman used phrases such as "if you tell anyone, I'll have to kill you" in her everyday speech. These phrases were used in the vernacular and were never meant as a threat. In fact, there was testimony that Slayman used such phrases in her conversations with Board members. No board member ever took offense at the use of the phrase, felt threatened by it, or gave it any thought until the filing of this grievance.

The evidence also supports the conclusion that some type of confrontation occurred between Slayman and Williams in August of 2013. To Williams' credit, she addressed the matter with Slayman and Slayman apologized. There was never another incident of this type between Slayman and Williams. Slayman's and Williams' testimony on these points is consistent. However, the language used and the severity of this incident is in question in that Slayman and Williams differ on the characterization of the event. In Williams' words, Slayman told her "she would slit my throat if I ever spoke to the Board members again".⁴³ Slayman denies using that verbiage but admits making a remark such as "I'll have to kill you".⁴⁴ Williams' further testimony was inconsistent with regard to whether she felt threatened. At one point in the testimony, she indicated that she was embarrassed, while in another she considered Slayman's language to be a threat. And in another, she testified that she knew Slayman was not going to act on the language. In later testimony, she stated that the language exhibited a level of frustration and anger.⁴⁵

It should be noted that this incident occurred in 2013 and the grievance was filed in 2015. Pursuant to the Chester County School District Board Policy Manual, Policy AR GBK-R, grievances must be filed within 10 days following the event giving rise to the grievance.⁴⁶ Thus, the time frame for filing a grievance on this event had long passed. It is interesting that this event, which had been amicably settled, was dredged up in a grievance in 2015 by the Chief Human Resource Officer who should have been aware of the 10 day rule.

43 Tr. p. 264, L. 4-7

44 Tr. p. 1262-1263, L. 21-6

39 Tr. P. 264-265, L. 9-12; p. 266, L. 8-18; p. 308, L. 7-18

46 <https://boardpolicyonline.com/?b=chester>

B. Failure to provide adequate security for the schools by hiring Defender Industries to provide such security as opposed to SRO's from the sheriff's office.

This issue generated much testimony at the hearing. The five grievants allege that Slayman placed the District's children in danger by replacing SRO's with Defender Industry security personnel in all the District's schools. However, this allegation was soundly contradicted by testimony of each of the four Board members. Each of the four board members testified that the issue of school security was being discussed prior to Slayman's employment with the District. The Board had long been concerned that the elementary schools had no security and the middle schools had very minimal security. Private security firms had been discussed as a possible solution. School security became a top priority during Slayman's administration due to the fact that the County could no longer support a portion of the costs for the SRO's and the District could not afford to fund the entire cost of such. The Sandy Hook Elementary School shooting incident in December 2012 emphasized the immediate need for security in all the District's schools. The testimony of the Board members establishes that the Board determined Defender to be the most cost effective solution and it was the Board's decision to hire Defender. Slayman was operating at the direction of the Board in contracting with Defender Industries and placing Defender's employees in the schools. As such, I find the grievants' testimony regarding this matter to be untrue and their allegations of misconduct as it relates to this issue to be without merit.

Stroud alleges that Slayman wrongfully refused to allow Stroud access to the Defender contract. This allegation is, likewise, false. The testimony of the Board members establishes that the Board decreed that the Defender contract was to be kept confidential. Slayman was once again acting at their direction. The allegation made by Stroud is thus without merit.

C. Providing false information to School Board members

The grievants alleged that Slayman did not inform the Board that the Defender employees present at a meeting to introduce the new security firm were not the actual officers who would be placed in the schools. Each of the four board members testified that they were aware of this fact at the time of the meeting. Thus, this allegation is without merit.

The grievants also alleged that Slayman did not inform the Board that the Defender officers did not have arrest powers. Again, each of the four board members testified that they were are aware of this fact. Thus, this allegation is, likewise, without merit.

In other testimony relating to this issue, the Board members were very complimentary of Slayman's diligence in keeping the Board informed. Her efforts were lauded for calling each Board member individually as opposed to texting or emailing the group. There was no testimony from the Board members that Slayman ever misled them or failed to inform them of matters they needed knowledge of. Accordingly, I find no evidence to support the grievants allegations in this regard.

D. Racists remarks

Gardner, one of the five grievants, testified to two racist remarks purportedly made by Slayman to him. The first was regarding Slayman's trip to Idaho. The remark was purportedly to the effect that Idaho had few African-Americans and was Heaven. Gardner then repeated this remark to other grievants who accepted it for the truth. In fact, Gardner's allegations of this remark influenced Williams, who is also African-American and admittedly did not hear the remark, to sign the grievance.⁴⁷

Slayman denied this allegation stating that she had commented on the sparse population in Idaho, which she compared to Heaven. Slayman admits that she stated that Idaho lacked diversity but denies that her statement regarding Heaven referred to the lack of diversity. Slayman is Hispanic and was always concerned about having a balance in diversity in the schools.⁴⁸ Slayman discussed the Idaho trip with S. Stroman when she returned. S. Stroman's account of that conversation corroborated Slayman's testimony.⁴⁹ S. Stroman went on to testify that she had never heard Slayman say anything derogatory about "any person, any race, any people".⁵⁰ S. Stroman concluded that the allegation took Slayman's comments out of context, just as the Bagley Report took Slayman's use of the vernacular out of context.⁵¹ Stroman further observed that Slayman had facilitated the promotion of African Americans into higher positions.⁵²

The second alleged remark was to the effect that the security officer for Louisville Elementary School had to be white. Slayman denied this and alluded that the officer actually placed in that school was black.⁵³ There was no further testimony regarding this allegation.

In addition to the comments made by S. Stroman above, James, who is African American, also expressed that she did not believe these allegations.⁵⁴

Likewise, Slayman's administrative assistant, McConnell, who is also African American, testified that she had never witnessed Slayman acting in a racist manner or making racist comments. She further testified that Slayman had promoted more African Americans than any other superintendent that she had known.⁵⁵

Finally, King admitted that he had never heard her make racial remarks.⁵⁶

47 Tr. p. 264-265, L. 18-3

48 Tr. p. 1322-23, L. 24-14

43 Tr. p. 543-544, L. 9-18

50 Tr. p. 602, L. 19-21

51 Tr. p. 543, L. 9-15

52 Tr. p. 545, L. 1-8

53 Tr. p. 1324, L. 2-16

54 Tr. p. 959-960, L. 23-6

55 Tr. p. 1027, L. 16-25

56 Tr. p. 83, L. 8-14

By the preponderance of the evidence, I find that these allegations are without merit.

E. Inappropriate discussion of District matters with local "breakfast club" members and adherence to their opinions

During her tenure as Superintendent, Slayman regularly had breakfast with certain community leaders. Her senior cabinet referred to the people who participated in these breakfasts as "the breakfast club". Each of the five grievants testified that Slayman made decisions based upon these breakfast club meetings. Slayman invited her senior staff to have breakfast with her and these leaders, however, only two, namely King and Gardner, testified that they had attended. Both testified that they attended one breakfast.

When the consultants and the Board members were questioned at the hearing about the propriety of Slayman having breakfast with community leaders, the overwhelming response was that this was both proper and a good practice. Further, John Agee, one of the county leaders comprising the "breakfast club", testified that the discussions centered around news in the County, with a lot of emphasis placed on the fire service since Agee was the fire chief. Per Agee, Slayman never shared confidential District business in these breakfasts.

From evidence cited above, it appears that this allegation is based upon conjecture as opposed to actual fact since only two of the senior cabinet members ever attended these breakfasts and they both attended only one. I find that neither King nor Gardner had sufficient knowledge on the basis of one breakfast to know if District business was discussed. Accordingly, I find that this allegation has no merit.

II. Credibility Issues With Witnesses

A. Dr. Charles King

King has been involved in two matters that bring into question the truth and veracity of his testimony in this case. First, during Slayman's administration, King utilized the District's MiFi for personal use at his home without notice to or prior authorization by the District. When questioned about this by Slayman, he became very upset. The grievance was filed immediately thereafter and Slayman never got the opportunity to complete that discussion with him. Although King's defense was that he did not take a District cell phone when offered, this fact did not legitimize his appropriation of the District's MiFi.

The second incident occurred after Slayman's departure from the District. This incident involved King's clinical supervision of an employee who was seeking to upgrade her administrative certification. King gave the employee his password and allowed her access to his files where he was to observe and evaluate her. The employee accessed these files and prepared the reports that King was supposed to prepare. When this was discovered by the District, he denied having given the employee his password. However, the employee provided the email in

which King did this. King left the employ of the District and was reported by the District to SCDE.⁵⁷

In addition to the above, certain of the allegations espoused by King against Slayman have been conclusively proven to be false (i.e. namely those related to Slayman's truthfulness to the Board).

Finally, King aspired to be a district superintendent. This is made clear in Petitioner's Exhibit 13 at page 4 where he states "I like to think that I am ready to be a Superintendent and will have my own district one day". He also let this be known to Slayman's successor, Angela Bain.⁵⁸

Based upon all of the above, I do not find King's testimony to be credible in this matter.

B. Jeff Gardner

Like King, Gardner also had an interest in becoming superintendent. Gardner applied for the position of Superintendent in 2012 along with Slayman. He was never seriously considered for the position in that he was deemed unqualified and only given a courtesy interview.

According to the testimony of the four consultants, the four Board members and Slayman, Gardner had problems completing his work on a timely basis. Some witnesses questioned his competency for the Assistant Superintendent position. Slayman had to address issues relating to Gardner's job performance with him during her tenure with the District. In her words, Gardner "struggled to keep all the balls in the air" and he was really frustrated.⁵⁹ Gardner was fearful of losing his job in that he was raising three children, two of which were in college.⁶⁰ Thus, Gardner had a motive to want Slayman gone.

Looking at the substance of his allegations against Slayman in light of other testimony at the hearing, it appears that certain of these allegations were false, taken out of context, or embellished. He then spread this information to others. Evidence of this is found in the testimony of Williams who signed the grievance because of Gardner's allegations of racial statements made by Slayman.

Based upon the above, I do not find Gardner's testimony to be credible.

C. Anna Stroud

Stroud's testimony at the hearing was the most venomous of the five grievants. In the Summer of 2015 just before the filing of the grievance, Slayman discovered that Stroud had knowingly taken pay raises in direct violation of an order by the Board that Stroud's salary was to be frozen

57 Tr. p. 1089, L. 4-19

58 Tr. p. 1086, L. 18-24

59 Tr. p. 1280, L. 3-16

60 Tr. p. 238, L. 12-23

until she completed certain educational requirements. This was an act of dishonesty and it brings into question the truth and veracity of her testimony in this matter.

It further establishes a motive for filing a grievance against Slayman in that Stroud was fearful of losing her job. The record in this case is resplendent with testimony by Board members and consultants critical of Stroud's job performance. Stroud was aware that the Board had discussed her termination on several occasions.

Finally, Stroud had strong ties to both the new sheriff and Hughes, neither of which favored Slayman. Stroud's husband worked for the new sheriff and was a prior SRO in the Chester schools. Stroud provided a significant amount of testimony regarding her affiliations with the new sheriff and Hughes as well as her opinions and fears regarding the failure to use SRO's in the schools. Certain allegations made by Stroud relating to the use of private security officers as opposed to SRO's were proven to false in subsequent testimony.

Based upon the above, I do not find Stroud's testimony to be credible.

CONCLUSION

After reviewing all the testimony and exhibits presented in this case, I find that SCDE has failed to prove by a preponderance of the evidence that the allegations against Slayman are true. Slayman's witnesses were all credible and had nothing to gain by their testimony on behalf of Slayman. In contrast, three of the five grievants evidenced substantial credibility concerns. The remaining two were convinced to sign onto the grievance based upon the representations of others. While Slayman admittedly used phrases such as "I'll have to kill you", those phrases were used in the vernacular, were never meant as threats, and would not have been seen as a threat by a reasonable person.

The one issue that is concerning is the incident between Williams and Slayman. It appears from the testimony that the conversation between those two in August of 2013 became intense and Slayman admittedly used one of her common phrases in the vernacular. Williams admitted that she knew that Slayman did not mean the phrase literally (i.e. there was no intent on Slayman's part to harm Williams). While this was not an ideal choice of words, I do not believe that such rises to the level of unprofessional conduct. It has been well established that these phrases in the vernacular were a regular part of Slayman's speech. Notably, Slayman had vast experience in managing people over the years and this issue had never arisen in the past. This leads me to the conclusion that the use of the phrase in this incident was taken out of context. However, even if Williams' context is believed, Slayman has been punished in a manner that far exceeds any reasonable punishment for this type of infraction. Her career and reputation have been destroyed by the allegations in this grievance and the media frenzy that ensued. She will likely never work again.

Based on the preponderance of the evidence presented, I recommend that this action against Dr. Agnes Slayman's teaching certificate #134958 be dismissed.



Malane S. Pike, Esquire
Hearing Officer

April 19, 2019
Date

Record on Appeal Note:

The Record on Appeal has made every attempt to match with the prescribed order of materials listed in Rule 210. The prescribed order places a full copy of the hearing transcript prior to other exhibits, such as this copy of the package presented to the State Board of Education.

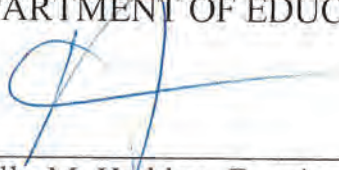
Because the transcript is voluminous in nature, the Respondent has not repeated the transcript here for the Record on Appeal. It was submitted in this spot for the original package given for review by the State Board of Education, as noted on the index page of the State Board Package.

CERTIFICATE OF COMPLIANCE

The undersigned counsel for the Respondent South Carolina Department of Education certifies that the Record on Appeal complies with the Supreme Court's Revised Order Concerning Personal Identifying Information and Other Sensitive Information in Appellate Court Filings, issued April 15, 2014.

SOUTH CAROLINA
DEPARTMENT OF EDUCATION

BY: _____


Holly M. Hadden, Esquire
Assistant General Counsel
Office of General Counsel
Division of Legal Affairs
1429 Senate Street, Suite 1015
Columbia, SC 29201
(803) 734-1807

Attorney for Respondent

Columbia, South Carolina

October 28, 2019

FILED

OCT 28 2019

SC ADMIN LAW COURT

PROOF OF SERVICE OF RESPONDENT'S BRIEF

THE STATE OF SOUTH CAROLINA
In the Administrative Law Court

APPEAL FROM THE SOUTH CAROLINA DEPARTMENT OF EDUCATION

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

Dr. Agnes Slayman,

Appellant,

v.

South Carolina Department of Education,

Respondent.

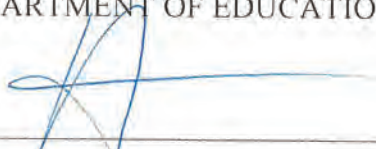
PROOF OF SERVICE

I certify that I have served the Record on Appeal on Dr. Agnes Slayman's counsel, Shannon Polvi, by hand delivering a copy of it to her office at 1418 Laurel Street, Suite A, Columbia, South Carolina 29201, on October 28, 2019.

October 28, 2019

SOUTH CAROLINA
DEPARTMENT OF EDUCATION

By: _____


Holly M. Hadden, Esquire
Assistant General Counsel
Office of General Counsel
Division of Legal Affairs
1429 Senate Street, Suite 1015
Columbia, SC 29201
(803) 734-1807
Attorney for Respondent

FILED

OCT 28 2019

2. I conclude your staff's health has been adversely affected as a result of the harassing, intimidating and hostile work environment.
3. I believe the Superintendent has lost the trust and respect of her team to the point that she cannot be an effective leader. A system cannot move forward without effective leadership, trust and mutual respect.
4. I conclude that the Superintendent has the ability to show different faces to different groups of people in order to manipulate outcomes and serve her own purpose.
5. I believe that the Superintendent's ongoing conduct and pattern of comments have possible serious legal ramifications for this school system. Legal action is under consideration by the senior leadership team.

Submitted by: Betty T. Bagley

Date: September 14, 2015

From: [Winburn, Scott](#)
To: [Shannon Polvi](#); [Malane Pike](#)
Cc: [Moore, Tracy](#)
Subject: RE: Dr. Slayman
Date: Monday, November 26, 2018 11:07:56 AM

Shannon,

I was hoping to avoid a protracted back and forth with supplemental briefing and objections that you mention. Litigants often submit competing orders for consideration in complex matters. Mostly, I thought providing a written summation/proposed order would benefit Ms. Pike's deliberations given the span of time we've been dealing with. The Department has been more than accommodating to your client, your witnesses, and your schedule, including the two additional weeks Ms. Pike approved for Mr. Boyd's affidavit. The Department's 6 witnesses provided their testimony back on October 3rd. The Department **does not** contend that its case is prejudiced by the span of time. To the contrary, the length of this hearing speaks to the Department's interest to ensure due process. The Department does not contend that this is a particularly complex case based on the record, and our proposal was aimed at sharing the Department's view of the case in the form of a written summation or proposed order, only if doing so would aid the Hearing Officer.

Of course, I defer Ms. Pike.

Thanks,
Scott

From: Shannon Polvi <Shannon@CBPHlaw.com>
Sent: Wednesday, November 21, 2018 4:24 PM
To: Winburn, Scott <SWinburn@ed.sc.gov>; Malane Pike <pikemal@gmail.com>
Subject: RE: Dr. Slayman

Good afternoon,

Scott, sorry I missed your call. I'm assuming you were calling about this. I've been tied up coordinating witnesses for an arbitration next week since I'm about to leave out of town for the Thanksgiving holiday. I'm about to run out the door now.

I oppose the below since we have the hearing opening and closing and witness testimonies already on the record. Without the transcript, I would feel at a disadvantage that there is high likelihood something important could be left out. Both/either party has the opportunity to submit objections / supplemental brief prior to the final determination by the Board, so that should suffice.

Have a Happy Thanksgiving,
Shannon

Shannon Polvi
CROMER BABB PORTER & HICKS, LLC

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From: Winburn, Scott <SWinburn@ed.sc.gov>
Sent: Wednesday, November 21, 2018 2:57 PM
To: Shannon Polvi <Shannon@CBPHlaw.com>; Malane Pike <pikemal@gmail.com>
Subject: RE: Dr. Slayman

Mr. Pike,

Given the span of time from the first witness to the last, and for the sake of judicial economy the Department would propose that both sides send written closing argument and/or proposed orders in this matter. I believe this may, at a minimum, aid in your deliberations and simplify the issues for determination.

Thank you for your consideration of this request.

Scott

From: Shannon Polvi <Shannon@CBPHlaw.com>
Sent: Monday, November 19, 2018 10:47 AM
To: Malane Pike <pikemal@gmail.com>; Winburn, Scott <SWinburn@ed.sc.gov>
Subject: Dr. Slayman

Dear Malane and Scott,

Gene Boyd and I played phone tag over the last two weeks and unfortunately I was not able to get him in to do an affidavit, so I do not have one to supplement the record further. But thankfully we have Maggie James and Sandra Stroman testimony already in the record and his testimony would be similar to both of their testimonies.

Sincerely,
Shannon

Shannon Polvi
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From: [Shannon Polvi](#)
To: [Henry Gunter](#)
Subject: RE: In the Matter of Agnes M. Slayman
Date: Friday, September 6, 2019 12:56:40 PM

Thank you, I look forward to meeting you on Tuesday.

Shannon Polvi

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From: Henry Gunter <vhgunter@ed.sc.gov>
Sent: Friday, September 06, 2019 8:46 AM
To: Shannon Polvi <Shannon@CBPHlaw.com>
Subject: RE: In the Matter of Agnes M. Slayman

Hey Shannon,

I hope you are doing well. We are still on schedule for 11:30 on Tuesday. The State Board members are given a packet of documents from the case one week before the hearing. The materials do include the hearing officer's report and recommendation. The transcript of the hearing, the Department's exceptions, and the Hearing Officer's response to those exceptions are also included, so the State Board will have knowledge about the underlying facts going into the meeting. Please let me know if you have any other questions.

Thanks,
Henry

V. Henry Gunter, Jr.
Deputy General Counsel
SC Department of Education
1429 Senate Street
Columbia, South Carolina 29201
803-734-8105 | phone
803-734-4384 | fax
vhgunter@ed.sc.gov

<http://www.ed.sc.gov>

From: Shannon Polvi <Shannon@CBPHlaw.com>
Sent: Thursday, September 5, 2019 6:10 PM
To: Henry Gunter <vhgunter@ed.sc.gov>
Subject: RE: In the Matter of Agnes M. Slayman

Dear Henry,

Just wanted to reconfirm the below, that we're on schedule for the State Board hearing at 11:30am on Tuesday, September 10th.

With regard to the materials given to the Board members, will they already have Ms. Pike's recommendation available to them prior to the hearing? I want to plan my 3 minutes the most efficiently based on their level of knowledge on the matter already.

Thanks,
Shannon

Shannon Polvi

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From: Henry Gunter <vhgunter@ed.sc.gov>
Sent: Monday, July 15, 2019 8:51 AM
To: Shannon Polvi <Shannon@CBPHlaw.com>
Subject: In the Matter of Agnes M. Slayman

Hey Shannon,

I apologize for my late response, I was out of the office Thursday and Friday and am catching up on emails. The State Board hearing will begin around 11:30. Please just let me know if you have any other questions. Thank you.

V. Henry Gunter, Jr.

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1429 Senate Street
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803-734-4384 | fax
vhgunter@ed.sc.gov
<http://www.ed.sc.gov>

From: Shannon Polvi <Shannon@CBPHlaw.com>
Sent: Thursday, July 11, 2019 10:45 PM
To: Henry Gunter <vhgunter@ed.sc.gov>
Cc: Kate Ray <Kate@cbphlaw.com>
Subject: RE: In the Matter of Agnes M. Slayman

Dear Henry,

Thank you for the information. Dr. Slayman and I will attend the meeting. I intend to make a brief address to the State Board on Dr. Slayman's behalf.

What is the scheduled start time? Kate will calendar it for me and inform our client of the details.

Thanks,
Shannon

Shannon Polvi

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From: Henry Gunter <vhgunter@ed.sc.gov>
Sent: Monday, July 08, 2019 3:49 PM
To: Shannon Polvi <Shannon@CBPHlaw.com>
Subject: In the Matter of Agnes M. Slayman

Good afternoon Shannon,

I hope you are doing well. My name is Henry Gunter and I am the deputy general counsel in charge of educator certification at the SC Department of Education. I just wanted to reach out to you regarding the date Dr. Slayman's case will go before the State Board. We are planning to present Ms. Slayman's case to the board at their meeting on September 10, 2019. As you probably have been informed, you and Dr. Slayman have the right to attend the State Board meeting and, if you choose, you may address the State Board for up to three minutes regarding the case. If you decide to attend the meeting, please let us know in advance so that we may notify the State Board and make arrangements with our building's security to have your names added to the visitor list. If you have any questions, please let me know. Thank you.

V. Henry Gunter, Jr.
Deputy General Counsel
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**Licensure Cases
Before the State Board of Education Educator Licensure Committee
September 10, 2019**

Teacher's Name: Agnes M. Slayman
Certificate Number: 134958
Charge: Unprofessional Conduct
Recommended Action: Contested Recommendation
Education Summary: Agnes M. Slayman earned her Bachelor's Degree in 1982, her Master's Degree in 1987, and her Doctorate Degree in 1997 from the University of South Carolina-Columbia. Dr. Slayman earned her Professional Certificate in 1997 and has over 33 years of teaching experience.

Exhibits

09-10-19	Order of Public Reprimand (for consideration)	Page 2
09-10-19	Order of Dismissal (for consideration)	Page 5
05-29-19	Letter to Board Chair from Hearing Officer Report and Recommendation	Page 8
07-09-19	SCDE's Objections to Report and Recommendation	Page 19
04-19-19	Hearing Officer Report and Recommendation	Page 54
11-02-18	Transcript of Hearing	Page 85
11-01-18		
10-12-18		
10-04-18		
10-03-18		

BEFORE THE SOUTH CAROLINA STATE BOARD OF EDUCATION

In the Matter of the
Disciplinary Action of the
Educator Certificate of
Agnes M. Slayman
Certificate 134958

ORDER OF PUBLIC REPRIMAND

SUMMARY OF THE CASE

The South Carolina State Board of Education (State Board) considered this matter on September 10, 2019. The South Carolina Department of Education (SCDE) notified Dr. Slayman of potential disciplinary action against her teaching certificate and informed her of her right to a hearing via a certified letter dated March 28, 2018. Dr. Slayman timely requested a hearing through her counsel, and such was held, beginning October 3, 2018, with the record being closed November 19, 2018. On April 19, 2019, the SCDE and Dr. Slayman received the hearing officer's report and recommendation. The hearing officer recommended that the action against Dr. Slayman be dismissed. On April 26, 2019, the SCDE submitted its written objections to the hearing officer and counsel for Dr. Slayman. After considering the evidence, testimony, the report and recommendation presented, and objections of the SCDE, the State Board voted to publicly reprimand Dr. Slayman.

FINDINGS OF FACT

This is a disciplinary matter involving unprofessional conduct. It is alleged that Dr. Slayman acted in an unprofessional manner by harassing, intimidating, and creating a hostile work environment for employees while serving as Superintendent of the Chester County School District (District).

The State Board has jurisdiction in this matter, pursuant to S.C. Code Ann. § 59-25-150 (2004). Dr. Slayman holds a valid South Carolina professional educator certificate and has over thirty-two years of experience. She has no prior record of disciplinary action with the State Board. Dr. Slayman was employed with the Chester County School District (District) as the Superintendent beginning in 2013 and ending with her resignation in 2016.

On October 14, 2015, the SCDE received a letter from the District reporting Dr. Slayman's resignation following an investigation into allegations that she threatened subordinates and created a hostile work environment for some employees. The District was made aware of allegations against Dr. Slayman in a grievance submitted by five employees (all cabinet level positions) on September 5, 2015. The District Board of Trustees, in executive session, heard the grievance on September 21, 2015. Dr. Slayman denied all allegations in the grievance hearing before the District Board of Trustees.

Dr. Slayman denied every allegation lodged by the cabinet members at the SCDE hearing as well. Yet, during the hearing, testimony revealed that the board members had considered at least some corrective action against Dr. Slayman in the form of an improvement plan. Dr. Slayman conceded that an improvement plan existed at the time of her resignation, giving credence to the allegations made by cabinet members (For example: The testimony of one cabinet member revealed that she was explicitly threatened by Dr. Slayman in front of her peers. More specifically, this threat occurred during a staff meeting where Dr. Slayman said to her that if she ever spoke directly to the Board again, Dr. Slayman would "slit her throat". The cabinet member further testified that she was shaken by the threat. This testimony was corroborated by the testimony of all of the SCDE's witnesses. Additionally, a second cabinet member provided testimony that corroborated the testimonies of the other SCDE witnesses. Most notable, the cabinet member described one specific instance where he was publically berated by Dr. Slayman in front of other principals in the district. Not only was this testimony corroborated by the other witnesses in this hearing, Dr. Slayman declined to call a single principal, assistant principal or a teacher in her defense, despite naming a multitude individuals as potential witnesses in this case). However, Dr. Slayman ultimately entered into a settlement agreement with the District and resigned her position as Superintendent, effective September 30, 2015. Further, as part of that agreement, Dr. Slayman continued employment as a consultant with the District until June 30, 2016.

After considering the evidence presented at the hearing, the hearing officer's recommendation and report, and the SCDE's objections, the State Board finds that the evidence presented demonstrates that Dr. Slayman engaged in conduct that was inappropriate and unprofessional for a District Superintendent.

CONCLUSIONS OF LAW

"The South Carolina Board of Education may, for just cause, either revoke or suspend the certificate of any person." S.C. Code Ann. §59-25-150 (2018); The State Board may, for just cause, issue a public reprimand. S.C. Code Ann. Regs. 43-58 (2018). Just cause includes unprofessional conduct. S.C. Code Ann. §59-25-160. The State Board finds that the evidence presented supports its conclusion that just cause does not exist to suspend or revoke the professional educator certificate of Agnes M. Slayman and that the issuance of a Public Reprimand to Dr. Slayman by the State Board is an appropriate sanction in this matter. The State Board finds that the record outlined above demonstrates that Dr. Slayman engaged in unprofessional conduct.

Now, therefore, it is hereby ordered that a Public Reprimand is issued to Agnes M. Slayman, certificate 134958. The public reprimand of Dr. Slayman, certificate 134958, shall be reported to the NASDTEC Clearinghouse and all South Carolina school districts within thirty days from the date of this order.

AND IT IS SO ORDERED.

South Carolina State Board of Education

Del-Gratia Jones, Chair

Columbia, South Carolina
September 10, 2019

BEFORE THE SOUTH CAROLINA STATE BOARD OF EDUCATION

In the Matter of the
Disciplinary Action of the
Educator Certificate of
Agnes M. Slayman
Certificate 134958

ORDER OF DISMISSAL

SUMMARY OF THE CASE

The South Carolina State Board of Education (State Board) considered this matter on September 10, 2019. The South Carolina Department of Education (SCDE) notified Dr. Slayman of potential disciplinary action against her teaching certificate and informed her of her right to a hearing via a certified letter dated March 28, 2018. Dr. Slayman timely requested a hearing through her counsel, and such was held, beginning October 3, 2018, with the record being closed November 19, 2018. On April 19, 2019, the SCDE and Dr. Slayman received the hearing officer's report and recommendation. The hearing officer recommended that the action against Dr. Slayman be dismissed. On April 26, 2019, the SCDE submitted its written objections to the hearing officer and counsel for Dr. Slayman. After considering the evidence, testimony, the report and recommendation presented, and objections of the SCDE, the State Board voted to dismiss this matter.

FINDINGS OF FACT

This is a disciplinary matter involving unprofessional conduct. It is alleged that Dr. Slayman acted in an unprofessional manner by harassing, intimidating, and creating a hostile work environment for employees while serving as Superintendent of the Chester County School District (District).

The State Board has jurisdiction in this matter, pursuant to S.C. Code Ann. § 59-25-150 (2004). Dr. Slayman holds a valid South Carolina professional educator certificate and has over thirty-two years of experience. She has no prior record of disciplinary action with the State Board. Dr. Slayman was employed with the Chester County School District (District) as the Superintendent beginning in 2013 and ending with her resignation in 2016.

On October 14, 2015, the SCDE received a letter from the District reporting Dr. Slayman's resignation following an investigation into allegations that she threatened subordinates and created a hostile work environment for some employees. The District was made aware of allegations against Dr. Slayman in a grievance submitted by five employees (all cabinet level positions) on September 5, 2015. The District Board of Trustees, in executive session, heard the grievance on September 21, 2015. Dr. Slayman denied all allegations in the grievance hearing before the District Board of Trustees.

Dr. Slayman denied every allegation lodged by the cabinet members at the SCDE hearing as well. Yet, during the hearing, testimony revealed that the board members had considered at least some corrective action against Dr. Slayman in the form of an improvement plan. Dr. Slayman conceded that an improvement plan existed at the time of her resignation, giving credence to the allegations made by cabinet members. However, Dr. Slayman ultimately entered into a settlement agreement with the District and resigned her position as Superintendent, effective September 30, 2015. Further, as part of that agreement, Dr. Slayman continued employment as a consultant with the District until June 30, 2016.

After considering the evidence presented at the hearing, the hearing officer's recommendation and report, and the SCDE's objections, the State Board finds that this matter should be dismissed.

CONCLUSIONS OF LAW

"The South Carolina Board of Education may, for just cause, either revoke or suspend the certificate of any person." S.C. Code Ann. §59-25-150 (2018); The State Board may, for just cause, issue a public reprimand. S.C. Code Ann. Regs. 43-58 (2018). Just cause includes unprofessional conduct. S.C. Code Ann. §59-25-160. The State Board finds that the evidence presented supports its conclusion that just cause does not exist to suspend or revoke the educator certificate of Agnes M. Slayman in this matter.

Agnes M. Slayman, Certificate 134958
Order of Dismissal
September 8, 2019
Page 3

Now, therefore, it is hereby ordered that the matter of Agnes M. Slayman, certificate 134958, be dismissed. The dismissal of the matter of Dr. Slayman, certificate 134958 shall be reported to the NASDTEC Clearinghouse and all South Carolina school districts within thirty days from the date of this order.

AND IT IS SO ORDERED.

South Carolina State Board of Education

Del-Gratia Jones, Chair

Columbia, South Carolina
September 10, 2019

MALANE S. PIKE

Attorney at Law

Post Office Box 729 White Rock, South Carolina 29177 (803) 622-1495

VIA EMAIL

May 29, 2019

Ms. Del-Gratia Jones, Chair
State Board of Education
1429 Senate Street
Columbia, SC 29201

RE: In the Matter of Agnes M. Slayman
Educator Certificate #134958

Dear Ms. Jones:

I am in receipt of the Office of General Counsel's (OGC) exceptions to my report in the above referenced matter. I would like to first state that I commend the OGC for providing its exceptions directly to the State Board in that it now allows us to air these issues prior to the State Board making its decision. Although I do not agree with the exceptions cited by the OGC, I certainly respect their position in that reasonable minds can differ. I have responded to the OGC's exceptions in the paragraphs below. I am also issuing an amended report to address the OGC's comments, however, my recommendation remains the same. Because of the wide disparity between the OGC's view of the evidence in this case and my view of the evidence in this case, I would strongly encourage the Board members to read the transcript and the exhibits before making a decision.

I was greatly troubled by this case and I spent many weeks analyzing all of the evidence provided at the hearing. The OGC presented the testimony of five grievants whose complaints against Dr. Slayman (Slayman) centered around several general themes common to all five. The OGC's sixth witness was Jeanne Ligon (Ligon). Ligon did not witness any of the behavior described by the grievants but did claim to have seen Brooke Clinton (Clinton) and Anna Stroud (Stroud) upset at various times, and Shawn Williams (Williams) upset on one occasion. Ligon testified that these people did not always discuss why they were upset but she understood it to be work related. She also observed Jeff Gardner (Gardner) when he appeared to be "visibly shaken or upset". However, she did not testify that this was linked to Slayman or was work related. When asked about her relationship with Slayman, she testified that she had a positive working relationship with Slayman and that she felt supported in the position that she held.

Ligon related one incident with Slayman in which she felt intimidated. That incident involved Slayman asking questions of Ligon relating to a previous IEP student who was about to graduate from college and needed a letter to address a purported disability which would have exempted him



**STATE OF SOUTH CAROLINA
DEPARTMENT OF EDUCATION**

MOLLY M. SPEARMAN
STATE SUPERINTENDENT OF EDUCATION

April 26, 2019

Ms. Del-Gratia Jones, Chair
State Board of Education
1429 Senate Street
Columbia, SC 29201

Re: In the Matter of Agnes M. Slayman
Educator Certificate #134958

Dear Madam Chair:

Please find enclosed the Office of General Counsel's (OGC) exceptions to the hearing officer's report and recommendation shown in red. I have copied the hearing officer and Ms. Polvi on this correspondence. Given the sheer volume of testimony in this case, I thought it best to include the State Board of Education (SBE) in this correspondence and include excerpts of the testimony so that the SBE can be as fully informed as possible as to aid in your deliberations when you ultimately decide this case. I have also included the OGC's proposed order submitted to the hearing officer, which summarized our recommendation. As you can see, the hearing officer has sided with the testimony of consultants over the employees in this case.

Based on her uncharacteristic omission of critical details, the draft report and recommendation is atypical. As written, the recommendation presents a very misleading account of the hearing and the issues presented for consideration. Most importantly, it unnecessarily seeks to diminish the testimony of witnesses called by the OGC.

This a case about bullying. The hearing officer and Dr. Slayman have made this case about the alleged victims, rather than the accused. In the attached document, I have made a good faith effort to include information that I believe to be critical to your deliberations. I do not have a stake in the outcome of this case but I do have a duty to the SBE, and, I believe, to the witnesses who testified voluntarily, willingly, and in good faith to uphold our process.

Thank you for your consideration of this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "E. Scott Winburn".

E. Scott Winburn
Deputy General Counsel
Office of General Counsel

Ms. Del-Gratia Jones, Chair
April 19, 2019
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Enclosed

cc: Malane Pike, Esq.
Shannon Polvi, Esq.

**STATE OF SOUTH CAROLINA STATE BOARD
OF EDUCATION**

In the Matter of Dr. Agnes Slayman))
Certificate 134958))

HEARING OFFICER'S
REPORT AND RECOMMENDATION

STATEMENT OF THE CASE

This is a matter of alleged unprofessional conduct in the nature of workplace harassment and intimidation of employees. SCDE is requesting that disciplinary action be taken against Dr. Agnes Slayman's (Slayman) educator certificate pursuant to S.C. Code Ann. §59-25-160 (2004). Pursuant to S.C. Code Ann. §59-25-170 (2004), the South Carolina Department of Education notified Slayman of potential disciplinary action against her teaching certificate and informed her of her right to a hearing via letter dated March 28, 2018, sent Certified and Regular Mail. Slayman timely requested a hearing and such was held over a period of five (5) days on October 3, 2018, October 4, 2018, October 12, 2018, November 1, 2018, and November 2, 2018 at the SCDE offices located at 1429 Senate Street, Columbia, South Carolina. Slayman requests that no disciplinary action be taken against her certificate in that the allegations are untrue.

This matter is properly before the South Carolina Board of Education ("State Board") pursuant to S.C. Code Ann. §59-25-150 (2004). It was referred to a hearing officer pursuant to S.C. Code Ann. §59-5-70(8) (2004).

After considering the evidence presented and the testimony of the parties and witnesses, it is recommended that the State Board dismiss this action against Slayman's teaching certificate #134958 for the reasons stated below.

APPEARANCES

On behalf of SCDE:

Scott Winburn, Esquire
Holly Hadden, Esquire
Katie Nilges, Law Clerk
Tracy Moore, Paralegal
Sara Brakmann, Law Clerk
Taylor Yarnel, Intern
South Carolina Department of Education
Office of General Counsel

Ken Puett, Chief Information/Security Officer South Carolina Department of Education

Dr. Charles King, Witness

Former Assistant Superintendent for Instruction Chester County School District

Leonard Jeffers (Jeff) Gardner, Witness

Former Assistant Superintendent for Operations Chester County School District

Shawn Williams, Witness

Former Chief Human Resource Officer Chester County
School District

Brooke Clinton, Witness

Former Public Information Officer Chester County School District

Anna Stroud, Witness Former Director of Finance

Chester County School District

Carol Jean Ligon, Witness

Executive Director of Special Services Chester County School District

On behalf of the Chester School District:

J. Alexander Sherard, Esquire

On behalf of Dr. Slayman:

Shannon Polvi, Esquire

Cromer, Babb, Porter & Hicks, LLC

John Mark Stiver, Witness

Consultant hired by Chester County School District

Sandra Stroman, Witness

Former member of Chester County School Board

James E. Stroman, Witness

Former member of Chester County School Board

John Agee, Witness Fire Chief in Richburg

Cyrus Corbett, Esquire Attorney for John Agee

Bill Bundy, Witness

Chester Health Care Foundation

Robert Allen Teal, Witness

Consultant for Chester County School District

Charles Gerald Moore, Witness

Consultant for Chester County School District

Dr. Jimmy Littlefield, Witness
Consultant for Chester County School District

Rev. William Stringfellow, Witness
Former member of Chester County School Board

Maggie James, Witness
Current member of Chester County School Board

Callie McConnell, Witness
Former Administrative Assistant to Slayman Chester County School District

Dr. Angela Bain, Witness
Current Superintendent Chester County School District

Dr. Agnes Slayman, Witness
Former Superintendent Chester County School District

FINDINGS OF FACT

Having observed the witnesses and exhibits presented at the hearing, I make the following Findings of Fact:

1. Slayman holds a valid South Carolina professional educator certificate and has over thirty-two years of experience. She has no prior record of disciplinary action with the State Board. She holds a Bachelor's, a Master's and a Doctoral degree, all conferred upon her by the University of South Carolina. Her past educational experience includes being a special education teacher, a high school assistant principal, a high school principal, Kershaw School District Assistant Superintendent for Curriculum and Instruction, and Chester School District Superintendent.
2. Slayman was employed in the Kershaw School District for over 20 years. She was the first female high school principal in the history of that district.
3. Slayman was employed with the Chester County School District (District) as the Superintendent in January 2012, and served in that capacity until her resignation on September 24, 2015.¹
4. Throughout her tenure with the District, she received various honors, awards, and accolades for her innovative methods of bringing the District into the twenty first century and for bringing additional money into the District. Some of those included:
 - a. Slayman received the Superintendent of the Year Award from the S.C. Career and Technology Education Association for the 2012-2013 school year.
 - b. For 2012, Great Falls Elementary was selected as a Pathfinder School.

1. The School Board voted 4-3 to accept Dr. Slayman's resignation

- c. For 2013, Slayman and the District were named a Duke Energy Power Partner.
- d. For 2013, the District was named a Microsoft Alliance Partnership. The District was the only one named in the Southeast and only one of 12 in the United States.
- e. In 2013, Slayman was invited to be a speaker at the Microsoft Mobility Conference in N.Y. This conference was attended by business and educational leaders from around the world.
- f. In 2014, Slayman was nominated for the S. C. Superintendent of the Year.
- g. In 2014, Slayman was named Educator of the Year by the S.C. Resource Officers Association.
- h. In 2014, two high schools in the District were named Bronze Schools by U.S. News and World Report.
- i. In 2014, Slayman was selected to serve on an international panel for Microsoft's Global Forum, to speak about the infusion of technology into education.
- j. In 2014, Slayman was one of 120 superintendents from across the U.S. invited to attend President Obama's White House ConnectED Superintendent Summit to discuss advancing education and advancing students across the U.S. through academics.
- k. In 2015, Slayman was recognized by the Martin Luther King Celebration Committee as the Grand Master of the parade. She was the first superintendent to be given that honor.
- l. In 2015, Slayman was nominated by the school board, the CEO's from business and industry, and the legislative delegation for Chester, Fairfield and Cherokee Counties for the S.C. School Administrators' S.C. Superintendent of the Year award.

Dr. Slayman was served by the same five senior cabinet members who filed the grievance. Further, Slayman conceded that the grievants were good employees who helped her achieve these accomplishments. Yet, this recommendation goes to great length to disparage and discredit these same individuals without telling the full story. Tr. p. 1326, L. 4-17.

5. On or about August 2015, Anna Stroud (Stroud), then Director of Finance, called Dr. Rick Hughes (Hughes), a District School Board member (Board), to advise him that Slayman's senior staff members intended to file a grievance against her. Hughes maintained the confidentiality of his informant and the other grievants. (Speculation and irrelevant. Further, this is not supported by the record as Dr. Hughes did not testify) Thus, the other Board members were not aware who the grievants were. (Speculation on the part of the hearing officer. Maggie James was the only witness to allege that Stroud called Hughes. The hearing officer implies that the full board testified in this matter. That is simply not the case. Of the witnesses called by Slayman, only two of them were members of the board when this matter occurred.)

6. Attorneys for the Board were contacted and the Board authorized an investigation to be done. At this point, nothing in writing had been submitted by the grievants and the Board was acting on the verbal communication between Stroud and Hughes. (Irrelevant and an assumption that the board was acting only based on Stroud and Hughes. Furthermore, the hearing officer erroneously finds below that Jeff Gardener was the "instigator" of the grievance. This is contradictory.)

7. Betty Bagley (Bagley) was hired to conduct the investigation. She was instructed by the Board that her investigation was restricted to interviews with the five senior staff members as well as Slayman and Slayman's administrative assistant. The Board, other than Hughes, did not know at this time that the five senior staff members were the grievants, but directed Bagley to interview

them in that those were the people who worked closest with Slayman. A very short time frame was given for this investigation and Bagley was instructed not to prepare a written report, but to verbally report her findings to the Board. Bagley made written notes of the interviews she conducted and these later became known as the "Bagley Report". Bagley delivered an oral report to the Board on September 3, 2015. Bagley did not testify at Slayman's disciplinary hearing, however her notes (i.e. the "Bagley Report") were entered into evidence.²

8. During Bagley's interview with Slayman, Bagley asked Slayman if she would resign. Slayman told Bagley that she would not. There is no testimony in the record that suggests that Bagley was authorized to request Slayman's resignation. Slayman was never again asked to resign.

9. A written letter, dated September 8, 2015, addressed to the Board Chair, Denise Lawson, and signed by each of the five senior staff members was filed with the Board. Those senior staff members were:

Dr. Charles King, former Assistant Superintendent for Instruction
Leonard Jeffers Gardner, former Assistant Superintendent for Operations
Shawn Williams, former Chief Human Resource Officer Brooke Clinton, former Public Information Officer Anna Stroud, former Director of Finance

The letter read as follows:

We are formally filing an official grievance due to a hostile work environment, implications of ethical violations, and racial and threatening remarks by Dr. Agnes Slayman, Superintendent of the Chester County School District.

We are requesting a closed door meeting of the Board as a group to present our concerns to the Board of Trustees. We respectfully request that Dr. Slayman not be in attendance during this meeting.

(See Petitioner's Exhibit 8).

10. On September 21, 2015, the five grievants were allowed to express their grievances regarding Slayman to the Board in executive session. Slayman was not present.

11. Slayman voluntarily resigned thereafter without the Board ever taking any formal action against her. (Misleading. Here, the hearing officer omits the fact that the board voted 4-3 to accept Slayman's resignation. Further, she omits the board agreed to pay Slayman \$300,000 in a settlement agreement. Tr. p. 586, L. 8-11. Most glaring is the hearing officer's omission of Slayman's "Improvement Plan", which was being considered by the board in response to Slayman's behavior towards the grievants. In fact, Slayman testified that she drafted one version of an Improvement Plan herself. Tr. p. 1375, L 15-17. Yet, the hearing officer completely omits this detail.) She and the Board entered into an agreement whereby Slayman was brought back as a consultant until June 30, 2016. The majority of the Board did not believe the claims being made against Slayman and wanted to vote that the claims had "no merit". (This is not substantiated by the record. Plus, it is belied by the IMPROVEMENT PLAN, and the fact that all board members DID NOT

² See Petitioner's Exhibit 14

TESTIFY.) However, the Board was strongly advised that they should vote that the claims were "moot" because Slayman had resigned. (This is favorable to OGC's position, but, nevertheless, the hearing officer should strike as the statement goes to attorney-client privilege between the full board and their attorney)

12. Slayman resigned because she felt that she would not be able to supervise the grievants in the future or provide direction to the District in that her actions would constantly be questioned.³

13. By letter dated October 14, 2015, SCDE received notice of Dr. Slayman's resignation and the allegations of the five employees. This letter was sent by the Interim District Superintendent, V. Keith Callicut, Ph.D (Callicut) pursuant to Regulation, R. 43-58.1. The school board did not vote on this action and was not aware that Callicut had sent the letter to SCDE. (Strike, irrelevant, gratuitous and confusing. Any certified individual who resigns or is terminated from employment amid allegations of unprofessional conduct (as is the case here), that educator must be reported to the SCDE by law). Thereafter, SCDE initiated an investigation into this matter which ultimately culminated in the five day hearing from which this recommendation is being written.

14. The events of this matter were chronicled in news reports and in postings on social media. The "Bagley Report" was anonymously leaked to the press. Slayman and the Board members were followed and continually harassed by the press and others. (Irrelevant, and confusing. Slayman testified that she was followed and harassed, but failed to provide any concrete evidence showing this was the case. Further, and again, based on my previous comments regarding board members testifying, the "board" did not testify).

15. Slayman has been unable to obtain employment since her resignation. (Strike, irrelevant. This statement might be relevant to mitigation of the penalty for unprofessional conduct. Yet, the hearing officer omits the \$300,000.00 settlement package (referenced above) and Slayman provided no concrete evidence that she had been turned down for positions specifically because of these allegations). Slayman was also a harmed in that she did not get to complete her TERE and had to begin drawing retirement. (This is not a damages hearing. It is not a civil tort matter. This is not a case about anyone's retirement. Further, it should be noted that Slayman was advised by counsel throughout this matter. Speculating about Slayman's harm is grossly inappropriate, and again, the statement warrants a response that Slayman VOLUNTARILY RESIGNED from her position, and signed a settlement agreement.)

16. The five grievants testified at the hearing. A summary of important facts (Obviously, the hearing officer omits a multitude of "important facts", please continue to review additions in red) about each of them as well as the allegations made by each is found below. Please note that the allegations referenced below are not findings of fact that the allegations are truthful, but rather, are findings of fact that these allegations have been made against Slayman.

Dr. Charles King (King)

17. King was hired by Slayman in July 2012 to work for the District as the Assistant Superintendent of Instruction. He reported directly to Slayman. Prior to this, King and Slayman

³ Tr. p. 1340, L. 5-9

had a long working relationship with each other in Kershaw County, spanning approximately 20 years, some of which involved King working directly for Slayman. When Slayman applied for the position of Superintendent in Chester, King wrote a recommendation to the Board in support of Slayman for this position.

18. In the Summer of 2015 just before the grievance was filed, Slayman discovered that King was using the District's Mi-Fi at home because he did not have internet service there. He was not authorized to use it for that purpose and Slayman made him return it. King became upset over this.⁴ (Competing testimony offered by King was intentionally omitted by the hearing officer. Testimony was offered by King where he stated that he had no idea Slayman even had concerns regarding the Mi-Fi. Further, he was given permission to use the Mi-Fi in place of having a district-issued cell phone. Both of which, King testified that Slayman was aware of. Tr. p. 132-134, L. 18-14.)

19. King continued to work for the District after Slayman's resignation until April 2016. (In fact, King was so well respected by his colleagues that he was initially appointed as acting Interim Superintendent by the Board Chair before Dr. Callicut was appointed). At that time, King was supervising an employee's administrative certification through Western Governor's University. As such, he was required to observe her and document her work to the University. He allowed this employee access to the portal where his documentation was to be placed. The employee, in turn, completed the documentation in King's name and submitted such to the University. He initially denied giving the employee access but was confronted with an email proving that he had provided such access. (Strike, confusing, blatant attempt to discredit King. This evidence was presented by Dr. Angela Bain, the current Superintendent in Chester County School District. Tr. p. 1089-1090, L 7- 18. In this case, it would only make sense for the hearing officer to make a finding as to Bain's credibility. Interestingly, Bain testified that all five grievants were bad workers who lacked credibility. In addition, King did not testify to this situation, nor was he asked whether he denied it. It is worth noting that Ms. Polvi and the hearing officer could have asked King this question.) He left the employ of the District as a result of this matter and the matter was reported to SCDE.⁵ (Interestingly, Ms. Polvi argued fervently that King had been reprimanded by the SCDE. King has never been reprimanded by the SCDE. Tr. p. 135, L. 9-24.)

20. King aspired to be a school superintendent and applied for superintendent positions but was not hired. He was briefly appointed as Interim Superintendent in Chester until Callicut was hired and again, just before Dr. Angela Bain (Bain) was hired. He is currently employed as a principal at Midway Elementary School in Kershaw County.

21. In testimony at the hearing, King alleged the following:

- a. Slayman would summon him to meetings irrespective of other meetings he may be participating in.
- b. Slayman allowed her "breakfast group", composed of the fire chief, the coroner, and numerous other individuals, to influence her decisions with regard to the District.
- c. At an administrator's retreat, Slayman, in a very loud and boisterous tone with her finger

⁴ Tr. p. 1250-1252, L. 18-4

⁵ Tr. p. 1089-90, L. 4-19; p. 1130-1131, L. 10-16

- pointed at him, chastised and chided him in front of almost the entire cadre of principals.⁶
- d. Slayman did not support the newly elected sheriff and did not agree with him coming into the schools to point out security deficiencies. As a result, she endorsed the hiring of a security chief and contracting with a private security agency to provide security to the schools as a replacement for the School Resource Officers (SRO's).
 - e. Slayman was not truthful with the school board in that she did not advise them that the private security agency did not have arrest powers and she led them to believe that the officers present at a luncheon announcing the replacement of the SRO's were the actual officers who would be placed in the schools.
 - f. He observed aggressive behavior on the part of Slayman. To wit, he heard Slayman state "I will kill that son of a bitch" referring to Rick Hughes, then school board member; "I will rip your throat out" referring to Williams; "I will cut your knees out from under you if you do this again", referring to Gardner.
 - g. He was sent by Slayman to conduct an investigation of an alleged illicit affair between the cheerleading coach and the new sheriff. In doing this, King had to question some of the cheerleaders. The coach ultimately resigned.

22. King never attempted to talk to Slayman about any comments she made to him, however, he suggested to her that she may have been a bit strong with others.

Leonard Jeffers Gardner (Gardner)

23. Gardner was the principal of Chester High School at the time Slayman was hired. She promoted him to Assistant Superintendent of School Operations in August 2012 and he held this position until his TERA ended in 2018. During this period, he was over Food Service, Attendance, Transportation, Maintenance, Athletics, IT, Security, and Building and Construction Projects. He is currently employed with the Chester County Career Center as a Carpentry Instructor.

24. Gardner orchestrated the filing of the letter of grievance.⁷ (Misleading at best. The footnote only sites part of Mr. Gardner's testimony and frankly stands for exactly the opposite of what the hearing officer claims. In response to the **next** question on page 220 of the transcript, Gardner testified: "It **wasn't** organized by one person." (*Emphasis added*). Tr. p. 220, L. 1-13. Furthermore, the grievants were represented and advised by counsel to make the grievance in writing. The hearing officer also seems to rely upon a portion of King's testimony without giving the full account. Later, and throughout this report, the hearing officer makes every effort to paint King as a liar.) At or about the time that the letter of grievance was being drafted in 2015, Gardner opted to retire and go on the TERA program. (According to testimony, Gardner continued to work for the district as chief operations officers and was allowed to finish out TERA. Additionally, at the time of hearing, Gardner had returned to teaching as a carpentry instructor, a position that he had held for many years. Tr. p. 171, L. 19-25; Tr. p. 243, L. 3-15.) Prior to that, Slayman had raised concerns with him about his work performance in that his work was not being completed in a timely fashion. Angela Bain (Bain), the Administrator succeeding Slayman, also raised similar concerns with him during her tenure as superintendent, as well as various Board members and

⁶ In further testimony, King admitted that this conversation occurred outside of the meeting room and only four or five principals witnesses it. (Tr. p. 35-38, L. 22- 9)

⁷ Tr. p. 219, L. 7-25 ; p. 128-129, L. 18-2

consultants.

25. Gardner was a contender for the job of District Superintendent when Slayman applied. However, Gardner was given only a courtesy interview in that he was unqualified for the job. (Misleading, and Gratuitous. Gardner testified that he was asked by others to consider serving as interim Superintendent, prior to Slayman being hired. He also conceded that he never sought his Superintendent's certification. Tr. p. 245, L. 14-16. This statement of fact is obviously meant to belittle and discredit Gardner. A lifelong resident of Chester, who has spent his career as a teacher, serving his community honorably for almost thirty years without even a hint of blemish on his reputation. In fact, Mr. Stroman (a former Board member in Chester and later a thoughtful member of the SBE) testified that he had known Mr. Gardner for years and he vouched for his character.

26. In testimony at the hearing, Gardner alleged the following:

The hearing officer completely omits arguably the most substantive and policy related point of contention, which fell under Gardner's purview: Slayman's refusal to cooperate with the Sheriff, which was raised in the OGC's proposed order to the hearing officer, and dismissed out of hand. Gardner testified very clearly about the need for joint training, while Slayman refused. Tr. p. 193, L. 2 – p. 194, L. 6.

On this topic, Slayman's testimony included the following: "I was frustrated with the sheriff...I'd let him do some active-shooter training in the schools *at one point*...(emphasis added) Oh , my God, 2014 maybe (as to when training occurred)...I don't know – I think they attended, but I know they were invited...-- I don't think they attended; no...No. Might have been Brooke that had – I don't know. Jeff or Brooke. Somebody – we – the school district invited all these people. It would either have been Brooke or Jeff or myself. Probably not me, but probably have been Brooke or Jeff...But I know we held training and we invited them..." Tr. P. 1371 – 1374. "I don't know what he (Gardner) is talking about in terms of what he sees as training..." The hearing officer ignores this issue.

The hearing officer also fails to identify testimony related to the hiring of the chief SSO, which was corroborated by King. Gardner testified that he later determined that he lied to the other applicants also about the starting salary after Slayman immediately doubled the salary of the position as soon as the applicant was chosen. Tr. p. 185, L. 1-19.

The hearing officer also fails to mention that Gardner attributes major health problems to the stress created by Slayman. He even sought help and counseling through the employee assistance program, as well as through his family doctor. Tr. p. 200, L. 11-21. Gardner testified that he was never on medication before, but now takes anxiety medication. He also explained that he served as principal, but the stress created by Dr. Slayman was significantly greater than his time as principal. Tr. p. 204, L. 10-25.

a. Slayman made threatening comments such as "cut your throat out"; "kill you" and referred to the fact that she had a CWP because she was afraid of the politics in that area. (No, Gardner testified that he made a note (his notes are in evidence) about Slayman's paranoia related to the County Sherriff. Gardner's actual testimony is as follows: "She

referred to driving at night and not knowing whether she would be stopped by an officer that the sheriff may have put out. She said, I carry - I carry a CWP because I'm worried about the politics around here." Tr. p. 176, L. 4-10.)

b. Slayman forbade him from speaking to the new sheriff and the county supervisor. In addition, the SRO's did not have access to school cameras or keys to school buildings.

c. Gardner was left out of meetings involving his areas of responsibility but was later berated for not knowing what was going on in that area. He was told by Slayman that he would go down along with Dr. King and herself. (Slayman agrees she made similar comments, but conveniently claims they were in jest.)

d. Slayman was paranoid about making decisions. As a result, she would make decisions and then change them multiple times.

e. Slayman instructed Gardner to tell the school Board that the officers from the private security firm present at a luncheon announcing the replacement of the SRO's were the actual officers who would be placed in the schools, when, in fact, they were not. He was also instructed not to advise the Board that the private security firm did not administer first aid or CPR.

f. Slayman made racial comments to the effect that the criteria for the security officer assigned to Louisville Elementary School was that he be white. (Providing the actual testimony here would be helpful to the SBE. Jeff Gardner referred to his detailed notes about his exchange with Slayman regarding Louisville High School: "I flashed my lights to get her (Slayman) to stop. She said, have you see the permanent security guard he brought to LSS [sic]. I said no. She said, he's black. Fix it." Gardner testified that he then called Mr. Siebert at Defender and relayed that very directive from Slayman. Specifically, the directive that the officer had to be white. Tr. p. 188, L. 9-21.) Slayman also made a racial comment about Idaho being "Heaven, man, Heaven" in that it was 95% white.

g. Slayman berated Dr. King in front of principals and administrators at a retreat. This incident involved shaking a finger in his face.

h. Slayman instructed Gardner and King to get rid of a cheerleading coach who was allegedly having an illicit affair with the newly elected sheriff. Gardner was not comfortable with this in that he and King were interviewing students about this and the students were becoming upset. As a result of the interviews, it appeared that this may have been the product of a false rumor started by a cheerleader who was not pleased with her placement on the squad. The cheerleading coach opted to resign her position in that she felt she could no longer be effective.

i. In response to a situation where three bus drivers requested a meeting with Slayman regarding a raise, Slayman later met with the supervisor of the bus drivers and told her "if I find out that you sent those bus drivers over here, I'll have your job for inciting a riot."

j. Slayman told Shawn Williams in a cabinet meeting that she would cut her throat out.

27. Gardner did not discuss any of the above allegations with Slayman prior to instigating the letter of grievance. (Misleading as to Gardner's testimony. See comment above. Gardner specifically testified that it was a group decision to file a grievance, not to mention that the group was represented by Attorney Al Nickels. Furthermore, Gardner testified candidly that he "chickened out" about confronting Slayman; that he was afraid of being fired so close to retirement, and that he had witnessed Slayman make remarks such as "we need to get rid of

her..."; speaking about another principal who challenged Slayman. The OCG could find nothing in the record that Slayman ever refutes this particular claim that she threatened to get rid of the principal.)

28. Gardner frequently complained about others that he worked with to Slayman, such as Anna Stroud and Shawn Williams. (The OGC requests that the hearing officer cite this testimony) In addition, King and Gardner frequently approached Slayman individually encouraging her to reorganize the District Office to give that individual more power. (Not supported by the record. However, even if this is accepted as true, it undermines Slayman's, and the hearing officer's, theory about a grand scheme for a coordinated coup carried out by the grievants.)

29. Slayman's remarks about having a CWP were made in a conversation with several people, including Gardner, about home security. (This is not Gardner's testimony. The hearing office must either declare that she believes Slayman's account over Mr. Gardner's account, or, she must somehow reconcile these two very different accounts about the CWP. The hearing officer should also determine whether portions of Gardner's notes regarding this testimony are not reliable, since Gardner's notes about his conversations with Slayman are in evidence.) Slayman testified she was asked if she could ever use it. She responded that she could if she felt threatened in her home.⁸ (The hearing officer must address claimant's credibility specifically.)

30. Slayman is Hispanic and denies making any racial comments. Slayman's comments were that there were no people when she got off the plane.⁹ She also discussed her Idaho trip with Board Member S. Stroman whose testimony corroborated this account. See below.

31. Slayman informed the Board members that the Defender officers present at the "meet and greet" may not be the same officers assigned to the schools. (To reiterate a very important point, the Board did not testify. The hearing officer must state that she believes Slayman's account over Gardner's and the other witnesses. Furthermore, the hearing officer fails to address the fact that Slayman misled her cabinet, including her head of security, Gardner, about the meeting.) She also informed the Board that Defender did not have arrest capabilities. The testimony of the Board members corroborates this. (Misleading. Again, the Board did not testify, and it is not known.) See below. However, the Defender officers had not been fully staffed at the time of the "meet and greet" was due to Gardner's failure to complete the task. (This is a red herring. The hearing officer's attempt to cherry-pick here is astounding. Rather than address the issue of who knew what, she includes this inaccurate claim, which is not relevant and not supported by the record. According to Gardner, Slayman told him that she had many conversations with Defender that he did not have, despite the fact that he was overseeing security. Tr. p. 225-227, L. 19-15. According to Gardner, Slayman knew more about the transition to Defender and would have been the one to know about the staffing issue, not Gardner as the hearing officer declares without providing the full record. It was during these same discussion about Defender that Slayman was heard to say; "if I am going down, you are going down with me." This testimony is established in the record (Tr. p. 227, L. 6-15) and has not been refuted.)

32. Slayman denies instructing Gardner and King to get rid of the cheerleading coach. (To make

⁸ Tr. p. 1278-1279, L. 11-20

⁹ Tr. p. 1322-1324, L.24-1

this statement, the hearing officer is essentially determining that Gardner and King lied, under oath, about this directive from Slayman. The report and recommendation must so reflect.) A distraught parent along with her distraught daughter came to Slayman's office to report that the cheerleading coach was using the students to cover for her sexual rendezvous and taking the students to locations to meet with this individual. The parent and the daughter were in Slayman's office when she assigned the task to Gardner and King to meet with the principal and interview the students. Slayman only had one side of the story and she asked Gardner and King to "find out what was going on".¹⁰ (Again, for these allegations to be accepted as factual, the hearing officer must make a finding she does not believe Gardner's and King's testimony about their impression and recollection of the directive and they both perjured themselves by lying under oath.)

33. Gardner had strong connections to Hughes in that Hughes was the baseball coach for Chester High School when Gardner was the principal of that school.¹¹ (This is pure speculation on the part of Slayman and the hearing officer accepts it as gospel. The hearing officer and Ms. Polvi could have asked Gardner about Hughes. But, instead, Gardner testified very specifically that Slayman made the following statement about Hughes: "we've got a board member that's gone rogue. He's -- we're gonna fix him. She said, I've got one of the board members talking to him now. We're going to fix him. I'll -- that was when she said, I'll cut his throat out." Tr. p. 203, L. 16 -24.)

Shawn Williams (Williams)

34. Williams was the Director of Human Resources (later renamed the Executive Director of Human Resources) in the District from July 2011 until June 2016. Thus, Williams was employed with the District for the entirety of Slayman's tenure as superintendent.

35. In testimony at the hearing, Williams alleged the following:

- a. On August 19, 2013, Williams thanked Board Members for participating in the new teacher orientation. The next day in a cabinet meeting, Slayman told Williams that she would slit her throat if she ever spoke to the Board members again. Williams left the meeting and reflected on the statement. She later went back to Slayman and discussed that she felt the statement was a threat. Slayman apologized and told her that she did not mean it that way. Slayman never made such a statement to Williams again.
- b. Williams heard Slayman tell other people that she would crucify them, rip his/her throat out, and kill them. Williams does not believe that she intended to do such things but nonetheless used this type of intense language.
- c. Williams acknowledged that it was a very tense time in the District with the SRO/private security transition.
- d. Certain principals expressed concerns to Williams that Slayman had told them she would kill them if they talked to anyone about the school security issue.
- e. Slayman had an open door policy but employees did not feel comfortable going to her.
- f. Slayman would be "the nicest person ever"¹² on one day and then be upset the next.
- g. Slayman's threatening comments exhibited a level of frustration and anger.

¹⁰ Tr. p. 1283-1284, L.8-24; p. 1355-1356, L. 5-5

¹¹ Tr. p. 1391, L. 20-24

¹² Tr. p. 301, L. 2-3

h. The "breaking straw"¹³ for Williams was the racial comment about Idaho being Heaven. Williams did not hear this comment personally but was relying on information provided to her by Gardner. (However, Ms. Williams testified that principals or an assistant superintendent would complain to her as the Human Resources Director. She described the complaints as: "constant, constant, constant..." Tr. p. 268, L. 1-22.)

36. Williams is currently employed with Richland School District 2 as the Chief Human Resource Officer. She was also employed in Orangeburg after leaving the District.

37. Slayman denies making the statement that she would slit Williams' throat. She admits making a remark to Williams to the effect of "I'll have to kill you". However, this remark was made in the vernacular and not meant as a threat. (Again, the hearing officer must make a finding about who she believes. Specifically, the hearing officer either accepts Williams' account as the truth, which is corroborated by all other witnesses, except Slayman, OR, does the hearing officer believe Slayman's account over the testimony of multiple witnesses? As to the specific words used: "slit your throat" is not considered vernacular in any region on earth) When Williams later advised Slayman that the remark was offensive and that she interpreted it as a threat, Slayman apologized and never made such a comment to Williams again.¹⁴ (No. Williams advised Slayman that others could be fired for making such a statement. Tr. p. 328-329. "I'll have to kill you" "in the vernacular", the phrase Slayman claims to have used and the words the hearing officer has opted for, would not have warranted such an admonition from the Director of Human Resources.)

Brooke Clinton (Clinton)

38. Clinton was the Public Information Officer for the District. She was hired by Slayman shortly after Slayman's employment with the District and remained after Slayman's departure. Clinton left the District in April 2016 and is currently employed with the Chester County Chamber of Commerce.

39. Clinton was not a part of the original group that verbally complained about Slayman. She was later drawn into signing the grievance after conversations with the other complainants and reading the "Bagley Report". (Misleading. Hearing officer omits Clinton testified she cared for Slayman, which is why her involvement in the grievance was personally difficult. Clinton also explained that she was a witness to many of the allegations contained in the Bagley Report and she was asked to corroborate the accounts. Tr. 363, L. 10-20.)

40. In testimony at the hearing, Clinton alleged the following:

- a. Slayman would tell them one thing in the morning and change her mind by the afternoon. She frequently elevated matters to crisis stage when, in fact, the matter was not a crisis.
- b. Slayman's decisions were based on emotion and not rational behavior which could have put school children in danger. An example of this was that Slayman refused to allow SRO's to view live camera feeds from the schools in that this would be giving the sheriff that access. Clinton believed that this decision was based on Slayman's dislike of the sheriff and

¹³ Tr. p. 268, L. 18-22

¹⁴ Tr. p. 1264, L.19-22; p. 265, L. 6-11

not the safety of the school children.

c. Slayman always provided professional support when Clinton needed it in her position (e.g. with wording or getting additional information from other sources).

d. Slayman "could hold you on a hook and scare you".¹⁵ As an example, Clinton relayed an incident in which Slayman sent her an email stating that she was really upset with her. Clinton could not get access to Slayman that day and was distressed regarding what the issue was. The next morning, she met with Slayman who advised her that she expected Clinton to produce correct work and that Clinton had misspelled a word. Clinton produced evidence to Slayman that her spelling was correct in that the word had an American and an English spelling. Slayman was then fine.

e. Clinton's most stressful event was the incident between Williams and Slayman. Slayman told Williams that she should not have spoken to the Board. She further told Williams, "I will slit your throat if you ever do that again."¹⁶ (Understatement. No. Clinton testified that in her "entire career...one of the most stressful moments of my career....And I will never forget. She told Shawn that she should not have spoken to the board, she looked at her, and in a very deliberate voice she said I will slit your throat if you ever do that again.... My hands were shaking so hard. I've never gotten over it." Tr. p. 328, L. 1-21. It is also critical to note that all witnesses were sequestered to maintain the integrity of the hearing. No witness heard any other witnesses testify. Yet, each of their account about this exchange in particular were strikingly similar. Furthermore, the hearing officer even had to admonish Ms. Polvi for suggesting somehow that the SCDE was "coaching" witnesses.)

f. Slayman used a lot of threatening language but she would use it in different ways. She would commonly use it in a joking manner (e.g. "I'm gon' kill you"¹⁷). However, she could also use it when she was agitated (e.g. "I'll crucify him"¹⁸).

g. This type of language was a part of Slayman's vernacular. (In an effort to somehow excuse Slayman for her unprofessional behavior, the hearing officer suggests Slayman used her own slang or vernacular. Someone's "own" vernacular is an oxymoron. It is possible Chester County, as a region, had its own vernacular, but Slayman did not establish that she was using Chester County vernacular when she threatened to "slit" Ms. Williams' throat. Webster's Dictionary defines vernacular as "using a language or dialect native to a region...") She would tell Clinton, "take this to your grave or I'll, you know, kill you if you say it".¹⁹ Clinton never interpreted this as a threat in the way that she interpreted Slayman's statement to Williams.

h. There were comments reported in the "Bagley Report" that Clinton had never heard.²⁰

i. Clinton's decision to sign the grievance hinged on her learning "the depth of what was happening to some of the other senior staff members".²¹

Anna Stroud (Stroud)

41. Stroud began working for the District in 2001 as an accounting supervisor and retired from

¹⁵ Tr. p. 325, L. 24-25

¹⁶ Tr. p. 328, L. 15-18

¹⁷ Tr. p. 329, L. 11-15

¹⁸ Tr. p. 329, L. 18-20

¹⁹ Tr. p. 331, L. 5-7

²⁰ Tr. p. 360, L. 9-13

²¹ Tr. p. 336-337, L.24-3

the District as the Executive Director of Finance. Her position was eliminated by the Board at the end of her TERI in May 2017. She is currently employed with an accounting practitioner in Chester.

42. Stroud's husband was a past SRO in the District and she had strong ties to the newly elected sheriff. (Red herring. Speculation and irrelevant.)

43. Stroud also had strong ties to Hughes, a board member who did not favor Slayman. Hughes had been her son's coach and also served as her son's emergency contact when it was discovered that he had a heart ailment. (Irrelevant. Again, Hughes did not testify. Must we have called every board member? And if so, why did Slayman not call all board members herself? She obviously was selective in the board members she asked to testify. This is made evident by the fact that of the "board" members Slayman did call, only two of them were board members at the time of the matter in question. Thus, to reiterate, any assumption the hearing officer places on testimony from the "board" members should automatically be taken with a grain of salt as she has mischaracterized them as being active members of the board during this time.)

44. Stroud's lack of education and credentials to perform her job as Director of Finance had long been a point of contention with the Board. Stroud only possessed an Associate degree. The Board froze her salary until such time as she completed certain financial courses. This was done prior to Slayman's employment with the District. In the summer of 2015, Slayman discovered that Stroud had been giving herself raises each time the school employees were voted a raise but had failed to complete the requisite financial courses. Slayman confronted Stroud about this prior to the filing of the grievance. (This is yet another red herring and an effort to discredit and belittle Ms. Stroud. The hearing officer omits the fact that the district received favorable audit reports every year Stroud served as Director of Finance. The hearing officer omits the testimony confirming that the Board approved proposed budgets, which included the purported illegal raises Stroud supposedly gave herself. The hearing officer omits testimony, uncontroverted by Stroud, that Stroud once reported a sexual harassment claim against a vendor and was subsequently reprimanded by Slayman for reporting the incident.)

45. Slayman was asked by the Board to terminate Stroud but Slayman argued against that in order to allow Stroud to complete her TERI.

47. It was Stroud who contacted Hughes to complain of the hostile environment created by Slayman. (Red herring. Strike. Irrelevant. This case is about the victims of alleged bullying, not board politics.)

48. In testimony at the hearing, Stroud alleged the following:

- a. Slayman dispensed with a dual enrollment agreement with York Technical College and increased the District's relationship with USC Lancaster. Stroud alleged that this did not benefit the children in that it lessened the number of courses that were available for the children toward a college degree while in high school.
- b. Stroud was never given a copy of the Defender Contract (the contract for the new school security officers) in that Slayman wanted to keep the terms close to the vest. All

other District contracts were kept in the Finance office.

- c. Stroud was concerned for her child's safety under the new security officers.
- d. Slayman became concerned that one of her senior staff had leaked confidential information. She lined them up and asked each one of them "Did you tell?"²²
- e. Slayman told her senior staff that she would cut their knees out from under them if they told certain things.
- f. Slayman was constantly finding or creating problems that were not factual about Stroud's job performance and about the Finance Department.
- g. Slayman frequently summoned her senior staff to her office because something was wrong or someone had done something.
- h. Slayman told Williams that she would cut her throat out.
- i. Slayman told the senior staff that if they talked to a board member, she'd fire them.
- J. Slayman told the Board that the security officers could carry guns and make arrests when, in fact, they did not have that legal authority.
- k. Slayman would not work with the new sheriff to provide active shooter training.

49. Active shooter training was provided by the sheriff.²³ (The Hearing officer completely misses the point here. In the same testimony the hearing officer cites, Slayman refers to training provided *before* "things didn't go well" with the Sherriff. Gardner testified very clearly as to his effort to mend fences *after* things had gone off the rails. And he testified regarding the extent to which Slayman was willing to maintain a grudge against the Sherriff by refusing to hold a joint training with Defender employees. Slayman refers to this same training in earlier testimony, which is also referenced above, that she let the Sherriff do training "at one point." Further, Gardner's testimony was never directly refuted by Slayman.) In addition, there was also training for first responders. The sheriff was invited to this but did not attend.²⁴

Jeanne Ligon (Ligon)

50. Ligon, a school psychologist and the executive director of special services for the District, testified on behalf of SCDE. She was not a member of Slayman's senior cabinet. She never witnessed the events described by the five complainants. (Hearing officer omits critical testimony here. Testimony which was most certainly probative of the facts at issue. Ms. Ligon testified very clearly that she witnessed various members of the senior cabinet come to her office to seek refuge and counsel from the very stressful environment created by Slayman. Tr. p. 478-486. She was a fact witness, and observed these professionals when they were visibly upset by the behavior of Slayman. For the hearing officer to dismiss, out of hand, the value of Ligon's testimony makes a mockery of the process she is presiding over and diminishes the courage Ligon showed in providing her testimony. Below, the hearing officer goes out of her way to describe all the corroborating witnesses the OGC *should* have called, in addition to the five grievants, yet she reports to the SBE that Ligon's testimony had no bearing on this case. Absurd. Furthermore, Ligon also presented a testimony that she felt pressured by Slayman to change a student's records related to his eligibility for a 504 plan. Ligon provided this testimony as the overseer of special education and felt so threatened by Slayman that she asked whether she should have a lawyer present.) She claimed to have heard senior cabinet members being summoned to Slayman's office by

²² Tr.p.387,L.15-18

²³ Tr. p. 1409, L. 16-21

²⁴ Tr. p. 1404-1405, L. 5-11

Slayman calling out their first name, however, several other witnesses disputed this in that the positions of the offices would not have allowed this.

51. To counter the above allegations, Slayman produced the testimony of four (4) school district members, four (4) consultants hired by the District, the current school superintendent who replaced Slayman, Slayman's administrative assistant, and two other people who had significant dealings with Slayman. The significant points of this testimony are found below.

Consultants on Behalf of Slayman

The hearing officer spends a disproportionate amount of time inflating the value of the witnesses presented by Slayman. The OGC tried (in vain apparently) to point out that every witness presented by Dr. Slayman had very little interaction with the grievants. Slayman's own testimony could not have more clearly articulated the OGC's position. Yet this testimony is disregarded by the hearing officer:

Q: Why was Callie McConnell the only employee to testify?

A: *She is the only one that would have worked close enough to me, other than the senior cabinet.* And, you know, this has been hard enough to get people to come in here. And I have had no contact with those people since I left.

52. The four (4) consultants testifying on behalf of Slayman were:

John Mark Stiver (Stiver)
Robert Allen Teal (Teal)
Charles Moore (Moore)
Dr. Jimmy Littlefield (Littlefield)

53. All four consultants found Slayman to be extremely professional and never witnessed the behaviors described by the five senior staff members.

54. Both Stiver and Teal worked under Slayman's supervision in the Kershaw School District. Slayman was always pleasant and professional. Neither had any experiences with Slayman similar to the allegations of the five complainants. Neither saw any evidence of a hostile environment in their work as a consultant with the District or evidence of low morale.

55. After retirement, Stiver became a technology consultant and contracted with the District during Slayman's tenure. Having worked with King, Gardner, and Stroud during the contract period, it was his observation that all three had problems managing their assigned responsibilities. *(The hearing officer must qualify this finding, and explain/cite for the SBE the amount of time Mr. Stiver actually spent in the district, so the SBE may judge the appropriateness of a consultant providing an opinion about the work ethic of his employers.)*

56. Teal had 22 years of association with Slayman. Their last task together in Kershaw was a comprehensive Title 9 audit complaint. This required that they spend a very large amount of hours together. Slayman never exhibited harmful, negative, or hostile behavior. Every association with her

was professional.²⁵

57. Moore, another consultant, was hired by the District to do a salary study. After working with Stroud, he had concerns about her abilities. His study advocated the hiring of a CFO.

58. Moore read the Bagley Report and concluded that somebody conspired to damage Slayman. He never experienced any of the behaviors Slayman was accused of. The content of the Bagley Report ruined his positive feelings for Betty Bagley. (Moore's conclusion about a report is a red hearing, irrelevant and including Moore's conclusion about the report is wholly inappropriate in light of the fact the hearing officer opines about how the author of the report should have done a better job, but gives her report no weight)

59. Littlefield was also a consultant in the District. Slayman requested that he analyze her budget in an effort to find money to train the District's reading specialist. Prior to his consultancy business and his retirement, Littlefield was a District Superintendent in Spartanburg for 23 years. Littlefield found Slayman to always be professional. In his words, "She knew what she wanted for the District and what she needed from other people to move the District along".²⁶ Having been a superintendent for so long, he could sense the environment by his interactions with the people employed there. His sense of the District office was that the environment and the morale were good. (Red herring. The hearing officer must qualify this finding, and explain/cite for the SBE the amount of time Dr. Littlefield actually spent in the district, so the SBE may judge the appropriateness of a consultant providing an opinion about the morale of his employers. Dr. Littlefield spent 15- 20 total days in the district over a two year period. Tr. p. 823, L. 8-10.)

60. Littlefield also addressed the need for a superintendent to have communication with the surrounding community. As superintendent, Slayman worked at the pleasure of the school board, who was elected by the community. Thus, she needed to know the pulse of the community to deal with issues in the District. Also, the superintendent should be the only person who should be communicating with the school board in an official capacity.

School Board Members on Behalf of Slayman

61. Four members of the school board testified on behalf of Slayman. Those members were:

- a. **Sandra Stroman (S. Stroman)** - School Board member from 2014 to 2017, which encompassed the filing of this grievance and Slayman's resignation.
- b. **James Stroman (J. Stroman)** - husband of S. Stroman - School Board member when Slayman was hired - left position in 2014 to become member of State Board of Education.
- c. **Rev. Bill Stringfellow (Stringfellow)** - School Board member for 28 years - He rotated off the Board in December 2014 after being defeated by Hughes and just before the allegations involving Slayman arose.
- d. **Maggie James (James)** - School Board member from 1993 to 2007, and again from 2011 to present. She was on the School Board throughout Slayman's tenure with the District.

62. The testimony of these Board members is important in that they were able to explain the events

²⁵ Tr. p. 749-751, L. 11-25

²⁶ Tr. p. 815, L. 11-14

that transpired during this period and put into perspective many of Slayman's actions that the grievants complained of. (Misleading. Many of the board members were not serving at time in question. Further, the hearing officer fails to reconcile how she believes these individuals, who were not employees, could provide valuable context, and yet, Ligon, a longtime employee and actual eyewitness to the morale and conditions existing at the time, had absolutely no worthy testimony.)

63. The following represents a synopsis of the testimony that was common to most or all board members:

As mentioned above, conspicuously absent in the hearing officer's report is any mention of the various Improvement Plans being considered by the Board (and Slayman) immediately prior to her voluntary resignation)

- a. Slayman's interactions with the Board were always professional and cordial and Slayman's interactions with her staff always appeared to be professional and cordial. Slayman was an outstanding leader of the District. She was innovative and brought technology to the forefront in that county. The Board was very pleased with her. (Yet, immediately prior to Slayman's resignation, multiple versions of Improvement Plans were being considered in response to Slayman's unprofessional behavior toward her staff and principals.)
- b. The Board members as well as other witnesses expressed disbelief that behavior of the nature expressed by the five complainants could exist without the knowledge of others. Chester is a small community and each of these Board members have strong ties to that community. For example, S. Stroman taught in 3 schools in that community for over 25 years; has friends on Slayman's staff and in the schools; attends the largest church in Chester; and her husband, J. Stroman, is a previous Board member. Neither she nor her husband heard of any problems regarding Slayman. Conversely, the Board heard immediately about problems with a prior superintendent. (Red herring. Misleading. Even the hearing officer describes a so-called media frenzy regarding Slayman.)
- c. The Board, as a body, never voted to terminate Slayman. (Misleading. The Board did vote to accept Slayman's resignation).
- d. Slayman was very good at keeping the Board advised of what she was doing and how she was doing it. She made personal telephone calls to each of the Board members as opposed to sending emails or text messages.
- e. Members of Slayman's senior cabinet regularly addressed the Board members throughout Slayman's tenure with the District.
- f. The issue of security in the District's schools had been an issue for many years prior to Slayman's tenure with the District. At the time of the Sandy Hook incident, the District only had four School Resource Officers (SRO's) serving nine schools. The elementary schools had no SRO's. If there was an accident on the interstate, the SRO's were subject to being called by the sheriff to go to the accident, thus leaving the schools with no security. Another determining factor was that the County had advised the District that it could no longer fund a part of the SRO's salary and the District could not afford this additional cost. The Board determined that Defender was a cost effective means of providing the needed security to all the schools. It was a Board decision to contract with Defender and to have that contract remain confidential.

g. Slayman advised the Board that officers at the "meet and greet" may not be the permanent officers. (According to Stroman, one of just two board members serving at the time.) Board was also aware that Defender did not have arrest powers. However, there was nothing to prevent law enforcement from being called.

h. Board members noted various problems with members of Slayman's staff as follows:

1) Slayman promoted Gardner to the District office but he struggled in that role. He had difficulty getting tasks completed and it appeared that he could not handle the position.

He came across as weak minded and did not want to obey authority. (Including the comment about Gardner being "weak-minded" is inappropriate and only aimed at belittling this good man. As a reminder, testimony establishes that senior cabinet members were to have no contact with board members. Tr. p. 143, L. 17-23.)

2) Gardner applied for the Superintendent position at the same time as Slayman. He was given a courtesy interview but was never really considered for the position because he was not qualified.

3) Stroud was not qualified for the job she held and could not seem to provide the school board members with the information that they wanted and needed. When asked by Board members to report on how much money the District had in various funds, she could not do so.

4) Stroud was instructed by the Board to obtain the necessary educational requirement for her job and was given a time frame in which to do it. Her salary was frozen until such time as she met the Board's requirements.

5) Clinton did not display good attention to detail in that she would send documents out with grammatical errors in them.

i. The filing of the grievance against Slayman appeared to be politically motivated. (Speculation. The grievants were advised by counsel to file the grievance. Additionally, Slayman could not identify a single way the grievants benefited.)

j. The investigation conducted by Betty Bagley into the allegations against Slayman and the resulting "Bagley Report" did not produce reliable information.

k. Dr. Callicutt, the interim superintendent, never informed the School Board that he was going to notify the State Board of the Slayman matter. The Board members were surprised by his actions and felt that they should have been notified of this prior to him taking action.

64. Stringfellow is a pastor and a lifetime resident of Chester. He was on the School Board for 28 years. He has numerous family members employed in the District's schools and is very well known in the Chester community.

65. Stringfellow was in and out of the District office almost every day. He never witnessed evidence of a hostile environment nor did he ever hear of any complaints against Slayman relating to a hostile environment or otherwise. Stringfellow had worked with many past superintendents in the District and he felt that the morale in the District office during Slayman's tenure was the highest he had ever seen it.²⁷(Misleading to the SBE. Mr. Stringfellow was not a member of the board when Slayman resigned voluntarily, and he was not party to the proposed improvement plans being discussed at that time.)

²⁷ Tr. p. 860, L. 9-15

66. Stringfellow observed that Slayman was a superintendent with leadership skills and she demanded that her employees do their job. He also observed that some employees were not doing their job.²⁸ (Misleading. The testimony cited: "And they had a bunch of people that wasn't doing their job." This testimony is not substantial enough for a finding.)

67. Stringfellow was aware that there was tension between the new Sheriff and Slayman. Stringfellow was aware of instances in which the sheriff was disrespectful to Slayman.

68. James asked that the Board limit Baggley's investigation to senior staff members to prevent unnecessary chaos in the District and because she felt that senior staff would know. She did not know at that time that senior staff had filed the grievance.

69. Hughes began his term on the board in January 2015 and the decision was made by the Board to replace the SRO's with a private security firm in April 2015. Hughes was also the doctor for the jail and thus worked with the sheriff. The sheriff was not in favor of the plan to replace the SRO's in that he would be losing the use of those officers. (Red hearing. Strike. The Sherriff did not testify.)

70. Slayman had a conversation with S. Stroman about her trip to Idaho. The comments were that Idaho was sparsely populated with vast territory; the air was clean; and the sky was beautiful. As such, it was close to Heaven. S. Stroman concluded that the allegations made by Gardner were taken out of context.²⁹ (Misleading. Ms. Stroman corroborated Gardner's testimony. In fact, Ms. Stroman confirmed that Slayman commented about the lack of diversity. Tr. p. 543, L. 24-4).

Slayman's Administrative Assistant on Behalf of Slayman

71. Callie McConnell (McConnell) was Slayman's administrative assistant in the District. Her office is adjacent to the superintendent's office and she interacted with Slayman daily. (McConnell testified that due to her close relation with the superintendent, she had little interaction with the senior cabinet. McConnell also testified this had been her experience with all senior cabinets over the last 31 years. Tr. p. 1061-1062, L. 9-10.) She had a good rapport with Slayman and enjoyed working for her.

72. McConnell's opinion of Slayman as superintendent of the District is as follows:

She's very knowledgeable about the job that was to be done. She was careful about the children, you know. She wanted the best for the children. And actually I felt, you know, she was really putting us on the map, 'cause Chester was so small, you know. But and she was bringing a lot of the technology. She brought a lot of that into play. She made it so that students could get access to tablets, computers, you know. And as I say, you know, she was good with the children, the parents, you know. She always tried to - if parents had problems, she would try to work them out, you know. I thought she did an exceptional job...³⁰

²⁸ Tr. p. 846, L 4-8

²⁹ Tr. p. 543-544, L. 9-18

³⁰ Tr. p. 1002-03, L. 20-9

73. McConnell never heard Slayman yell at anyone nor did she ever observe Slayman making racial or threatening remarks. Further, she did not hear anyone say that Slayman had made threatening remarks to them.

74. Slayman hired more African American people into administrative positions than any of the other superintendents that McConnell has known.

75. McConnell was interviewed by Betty Bagley for approximately 8 to 10 minutes. McConnell's comments were all positive with regard to Slayman. When the Bagley Report was later published, McConnell saw that it contained no references to her comments about Slayman. (Please see comments in red related to the multitude of omissions in this report and recommendation)

76. McConnell never observed Slayman misleading the Board in any way.

77. McConnell was familiar with the circumstances regarding the activities of the cheerleading coach that Slayman requested King and Gardner investigate. A parent reported to Slayman that the cheerleading coach wanted her daughter to cover for her while she met the Sheriff. The parent was disturbed about these facts and provided a written statement with regard to the matter. (Red herring. Irrelevant to the issues in question. McConnell also testified that she was not present when Slayman talked to King and Gardner about the situation. Tr. p. 1040, L. 6-8.)

Others Who had Dealings with Slayman

78. John Agee (Agee) was the originator of the "breakfast club", a group of residents who congregated at a local restaurant for breakfast. Slayman frequently joined them for breakfast. The "breakfast club" was open to anyone who wanted to sit with Agee and have breakfast.

79. The conversation at the breakfast club centered around community matters but was mostly about the fire service because Agee was chief of the fire service.

80. Slayman did not share any confidential information about the District during these breakfasts. Nor did she solicit guidance from the "breakfast club" on District matters.³¹

81. Slayman was very supportive of the fire service. She invited the fire service to participate in security training put on by the District. This was the first time that the fire service had ever been asked to participate in such events with the District and it was much appreciated by Agee and the fire service.³²

82. Slayman's relationship with community organizations was excellent. She did not just go - she participated.³³ (Red herring. Irrelevant to the issues in question.)

³¹ Tr. p. 653-654, L. 25-9

³² Tr. p. 657, L. 12-20

³³ Tr. p. 665, L. 15-23

83. Agee's observations of Slayman were nothing but professional. He never observed Slayman yelling at anyone or threatening anyone. Further, he never heard any rumors of a hostile work environment during Slayman's administration.³⁴ (It is inappropriate to make findings on the absence of rumors.)

84. Bill Bundy (Bundy) is president of the Chester Health Care Foundation and chairman of the District's Public Education Foundation. Slayman solicited funds from Bundy for mini-grants and scholarships. She obtained \$150,000 over time for various school programs. Bundy interacted with Slayman weekly with regard to these various matters. (Red herring. Irrelevant to the issues in question.)

85. Bundy found Slayman to be professional with a great deal of integrity.³⁵ Bundy saw no indication of a hostile environment, nor did he ever observe her yelling or threatening anyone.

APPLICABLE LAW

1. S.C. Code Ann. § 59-25-150 (2004) provides that the State Board of Education may revoke or suspend the certificate of any person for just cause.

2. S.C. Code Ann. § 59-25-160 (2004) defines "just cause". Section 59-25-160 (4) states that "just cause" may consist of unprofessional conduct.

3. S.C. Code Ann. (Regulations) 43-58 states that the State Board of Education has the legal authority to deny, revoke, or suspend a certificate, or issue a public reprimand for a variety of causes including unprofessional conduct.

4. The standard of proof in a professional disciplinary matter is preponderance of the evidence. *Anonymous (M-156-90) v. State Board of Medical Examiners*, 329 S.C. 371, 496 S.E.2d 17 (1998).

"A preponderance of the evidence stated simply is that evidence which convinces as to its truth". *State v. Scott*, 420 S.C. 108 at 113, 800 S.E.2d 793 at 796 (Ct. App. 2017). Stated differently, the "facts supporting the claim are more probable than their nonexistence". *US*.

Steel Min. Co., Inc. v. Director, Office of Workers' Compensation Programs, US, Dept of Labor, 187 F.3d 384 (4th Cir. 1999).

RECOMMENDATIONS

Having carefully considered all the testimony and exhibits, I find that there is insufficient probative evidence to prove the allegations of unprofessional conduct in the nature of workplace harassment and intimidation of employees or on any other basis alleged herein and described below. The evidence presented at the hearing in support of these allegations was the testimony of five

³⁴ Tr. p. 666-667, L. 14-8

³⁵ Tr. p. 709, L. 15-17

employees that comprised Slayman's senior cabinet.³⁶ (In this footnote, the hearing officer attempts to hide arguably the most important witness. A witness who was a longtime employee of the district, not a consultant, and not one of the five grievants accused of formulating a coup. Slayman testified: "And I'm gonna tell you, Jeannie Ligon is good." Slayman called Ms. Ligon "PROBABLY THE STRONGEST EMPLOYEE THAT THE DISTRICT HAS." Tr. p. 1291, L. 22-24. Therefore, who better to determine the "morale" of the district than the strongest, and actual, employee of the District? Who better to share with the hearing officer and the SBE what she observed regarding the work environment and the stress under which the senior cabinet was operating while Slayman was at the helm? This testimony was riddled with statements that were contradicted by the testimony of numerous other witnesses, thereby making the truth and veracity of such highly questionable. (The grievants testified consistently even though they were sequestered during the hearing and their stories mirror each other). Several of these employees were also disgruntled over job performance issues or other issues related to the job, raising further issues of credibility. Tragically, these five individuals put into motion a chain of events that culminated in a media frenzy, marking an end to Slayman's otherwise unblemished education career.

The bulk of their testimony mirrored each other. Of the allegations made, the ones that would be actionable against Slayman's certificate can be condensed into the following five categories:

The hearing officer mischaracterizes the issues. The OGC's focus was on Slayman's treatment of her subordinates. The security provided by Defender was not at issue, nor was the so-called "breakfast club" a primary issue, and nor was the fact that Slayman had a CWP ever an issue. The OGC's focus in this case can be summarized in its pre-hearing statement and its proposed Order of Public Reprimand (attached).

- A. Hostile treatment of the five complainants and others to include intimidation, public degradation, threats such as "I will rip your throat out", "I will kill you", "I will cut your legs off" as well as reference to the fact that she had a CWP;
- B. Failure to provide adequate security for the schools by hiring Defender Industries to provide such security as opposed to SRO's from the sheriff's office; (Training was the issue. Gardner's testimony reflects Slayman's willingness to continue her political grudge match with the sheriff to the possible detriment of student safety.)
- C. Providing false information to School Board members;
- D. Racists remarks; and
- E. Inappropriate discussion of confidential District matters with local "breakfast club" members and adherence to their opinions.

The paragraphs below will examine each of these allegations as well as issues involving the five employees making these allegations.

I. The Allegations

A. Hostile treatment of the five complainants to include intimidation, public

³⁶ Although a sixth employee testified, she could not provide probative evidence as to any of the matters complained of. False.

degradation, threats such as "I will rip your throat out", "I will kill you", "I will cut your legs off";

This allegation is by far the most serious of the allegations made against Slayman. However, in examining all of the evidence presented, I cannot say by a preponderance of that evidence that this allegation is truthful.

Prior to Slayman's employment with the District, she was employed in the Kershaw School District for over twenty years. Her record there was unblemished and she was continually promoted to higher positions. Two witnesses, Teal and Stiver, worked for Slayman in Kershaw and testified with regard to their experiences with her. Their experience with Slayman was professional and pleasant. Teal spent an extensive amount of time with Slayman while in Kershaw and was adamant that she never exhibited harmful, negative or hostile behavior. Notably, King (one of the grievants) also worked for Slayman in Kershaw. When Slayman offered him a job in the District working for her again, he did not hesitate to take it. Two other consultants for the District and four board members testified that their interactions with Slayman had likewise been professional and pleasant, with no evidence of the behaviors noted above.

The four Board members and the four consultants went on to testify that they had the opportunity to observe Slayman's interactions with her staff and that such interactions were always pleasant. Three of the Board members³⁷ and the four consultants had the opportunity to observe the atmosphere and morale in the District office. They all testified that such was very good. None of these eight people saw evidence of the hostile environment described by the five employees.

Slayman's administrative assistant, McConnell, whose office was adjacent to Slayman's, testified that she had a good rapport with Slayman and had never seen these behaviors that the five grievants alleged. In fact, she described the filing of this grievance as a "coup".³⁸

Curiously, the only evidence in the record regarding this egregious behavior is the testimony of the five grievants.

(Slayman called just one employee, and she provided this reasoning:

Q. Why was Callie McConnell the only employee to testify?

A: She is the only one that would have worked close enough to me, other than the senior cabinet. And, you know, this has been hard enough to get people to come in here. And I have had no contact with those people since I left.

(Further, please see Ligon's testimony.)

Despite the fact that King and Gardner allege that King was berated publicly by Slayman in front of certain principals, those principals were not brought forth to corroborate this behavior. (The hearing officer refused to listen to the witnesses who were presented, specifically Ligon. Additionally, the hearing officer ignores Slayman's testimony about relevant witnesses (see above). How many witnesses must be presented in this case? 30? The OGC met its burden.

³⁷ Tr.p.1009,L.15-24

³⁸ Tr. p. 1009, L. 15-24

Slayman has a right to present witnesses. Slayman claims that witnesses were hard to reach, ignoring the fact that she presented countless witnesses, the record was left open for her to present others, and she never utilized subpoena power which was afforded). Similarly, Gardner's allegation that Slayman treated the supervisor of the bus drivers in a hostile manner was not corroborated by testimony of the supervisor that purportedly suffered this treatment. (To the contrary, Slayman merely testified that she didn't "think" she behaved as described by Gardner during this exchange. Notably, Slayman never denied making the specific statements alleged by Gardner. Tr. P. 1354.) It should also be noted that none of the grievants other than Williams (discussed *infra*.) ever approached Slayman regarding any matters that offended them prior to filing this grievance. (As noted above, the hearing officer omits their explanations as to why they failed to confront their supervisor. Furthermore, Slayman's absolute refusal to acknowledge any wrongdoing whatsoever is patently obvious that confronting Slayman would have been futile. Tr. p. 1383.)

It was duly noted by several witnesses that Chester is a small, tightly knit community. As such, it is highly unlikely that knowledge of this type of behavior could be suppressed for three years, especially given the deeply rooted connections of the Board members and the fact that Slayman's purported behavior was not just behind closed doors. (Interestingly, the hearing officer omits testimony from Slayman confirming that an improvement plan being discussed by the board included a provision that she would have an "open door" and that Slayman would not "threaten any employee or board member." Tr. p. 1376, L. 12-23). Notably, problems with the prior superintendent quickly reached the ears of Board members. This begs the question of why this type of shocking and reprehensible behavior would not have been fodder for discussion all over Chester. (Strike, speculation).

I further place no reliance on the Bagley Report and the conclusions therefrom due to the limited scope of the investigation. The requirements imposed on Bagley's investigation by the Board were that she could only speak to the five grievants as well as Ligon, Slayman, and McConnell and the investigation was to be concluded in a very short timeframe (i.e. a few days). By placing time and scope limitations on Bagley, the Board unwittingly precluded Bagley from arriving at a fair and accurate conclusion.^{39,40} As a result, the report made affirmative conclusions about Slayman's conduct toward her staff with no attempt to verify the truth of the information received, even though, as noted above, some of the alleged acts occurred in front of others.⁴¹ The report also made

³⁹ At the time that Bagley was hired for this assignment, the Board as a whole was unaware of who the grievants were. Thus, my statements regarding the restrictions placed on Bagley are not meant to suggest that the Board's intentions in imposing such restrictions were impure. In fact, the majority of the Board supported Slayman and felt that the allegations were false. (False. This is not verified. The board did not testify. The hearing officer could have subpoenaed the other board members Slayman failed to call. The Board voted that the findings of the Bagley report were moot, not that they were "without merit". The hearing officer certainly understands "moot" as a term of art, vs. "no merit". In her letter to the OGC, Slayman claimed the findings were without merit, and she claimed not to understand mootness during testimony.) The Board was, in fact, attempting to protect Slayman by limiting knowledge that these accusations had been made.

⁴⁰ Bagley is now employed with SCDE (Incorrect) and did not testify at the hearing. However, her "report", which was nothing more than her notes from the interviews, was introduced as evidence and admitted as Petitioner's Exhibit 14.

⁴¹ For example, see Petitioner's Exhibit 14, p. 5 at the fourth bullet; p. 7 at the seventh bullet. These incidents could have been corroborated with third parties. (The OGC's witnesses did provide corroborating testimony. Hearing officer has already declared Ligon's testimony pointless. Further, Slayman could have called an employee, but she obviously could not locate any other district employees. See Slayman testimony above regarding why she called just one employee witness.)

affirmative conclusions regarding Slayman's treatment of persons other than those being interviewed, without first verifying these incidents with the people involved.⁴² Finally, there is no mention in the report that further investigation was needed or advisable. **(The hearing officer first says that Bagley was hamstrung by the Board. Yet, she assumes Bagley should have, or could have, informed the board that she needed more time to investigate or expand the scope of the investigation. See Slayman's testimony regarding only calling one employee witness. Pure speculation and conjecture, which has no place here.)** There was no testimony and no documentary evidence introduced at the hearing to indicate that Bagley went back to the Board to request that the scope of her investigation be expanded to these other parties and there is no evidence that she informed the Board of these shortcomings in her presentation. **(Again, pure conjecture. Slayman voluntarily resigned less than two weeks after the Bagley report with a settlement agreement in hand worth \$300,000. The only conclusion to be drawn is that if the Bagley report was so woefully inadequate, resignation would not have been the answer.)**

Another serious shortcoming of the Bagley Report is that it did not portray all the information that was provided to Bagley. For example, McConnell was interviewed by Bagley but McConnell's comments, which were positive toward Slayman, were not reflected in Bagley's report. This is quite disturbing in that the purpose of Bagley's investigation was for use by the Board in making a determination with regard to serious allegations of misconduct. The fact that McConnell's office was immediately outside of Slayman's door and McConnell never saw or heard the behaviors described by the grievants is a significant fact and should have been reported to the Board. For all the reasons stated above, this report has been given no weight in my recommendation.

While the evidence does not support the behaviors as described by the five grievants, the evidence does support that Slayman used phrases such as "if you tell anyone, I'll have to kill you" in her everyday speech. These phrases were used in the vernacular and were never meant as a threat. In fact, there was testimony that Slayman used such phrases in her conversations with Board members. No board member ever took offense at the use of the phrase, felt threatened by it, or gave it any thought until the filing of this grievance. **(Misleading and should be removed. Slayman did not call the Board, and only one of her witnesses was a subordinate.)**

The evidence also supports the conclusion that some type of confrontation occurred between Slayman and Williams in August of 2013. To Williams' credit, she addressed the matter with Slayman and Slayman apologized. There was never another incident of this type between Slayman and Williams. Slayman's and Williams' testimony on these points is consistent. However, the language used and the severity of this incident is in question in that Slayman and Williams differ on the characterization of the event. In Williams' words, Slayman told her "she would slit my throat if I ever spoke to the Board members again".⁴³ Slayman denies using that verbiage but admits making a remark such as "I'll have to kill you".⁴⁴ Williams' further testimony was inconsistent with regard to whether she felt threatened. At one point in the testimony, she indicated that she was embarrassed, while in another she considered Slayman's

⁴² See Petitioner's Exhibit 14, p. 3 at first full bullet; p 6 at first bullet and last bullet.

⁴³ Tr. p. 264, L. 4-7

⁴⁴ Tr. p. 1262-1263, L. 21-6

language to be a threat. And in another, she testified that she knew Slayman was not going to act on the language. In later testimony, she stated that the language exhibited a level of frustration and anger.⁴⁵ (I am providing Williams' complete testimony since it has been mischaracterized by the hearing officer. It is worth reiterating that Williams' account of the exchange is corroborated by Gardner, King, Stroud, and Clinton.)

It should be noted that this incident occurred in 2013 and the grievance was filed in 2015. Pursuant to the Chester County School District Board Policy Manual, Policy AR GBK-R, grievances must be filed within 10 days following the event giving rise to the grievance.⁴⁶ Thus, the time frame for filing a grievance on this event had long passed. It is interesting that this event, which had been amicably settled, was dredged up in a grievance in 2015 by the Chief Human Resource Officer who should have been aware of the 10 day rule. (Outside the record. Red herring. Further, the hearing officer questions the rationale of Ms. Williams, whom Slayman nominated for HR Director of the year.)

B. Failure to provide adequate security for the schools by hiring Defender Industries to provide such security as opposed to SRO's from the sheriff's office.

This issue generated much testimony at the hearing. The five grievants allege that Slayman placed the District's children in danger by replacing SRO's with Defender Industry security personnel in all the District's schools. (No. The OGC only tried to highlight the fact that Slayman's running dispute with the Sheriff and her level of paranoia in that connection created a disturbance in the district. Specifically, Gardner testified that additional training and cooperation with the Sheriff was needed, and his efforts were thwarted by Slayman. There is virtually no testimony regarding the District decision to hire Defender. Questions arose regarding implementation.) However, this allegation was soundly contradicted by testimony of each of the four Board members. Each of the four board members testified that the issue of school security was being discussed prior to Slayman's employment with the District. The Board had long been concerned that the elementary schools had no security and the middle schools had very minimal security. Private security firms had been discussed as a possible solution. School security became a top priority during Slayman's administration due to the fact that the County could no longer support a portion of the costs for the SRO's and the District could not afford to fund the entire cost of such. The Sandy Hook Elementary School shooting incident in December 2012 emphasized the immediate need for security in all the District's schools. The testimony of the Board members establishes that the Board determined Defender to be the most cost effective solution and it was the Board's decision to hire Defender. Slayman was operating at the direction of the Board in contracting with Defender Industries and placing Defender's employees in the schools. As such, I find the grievants' testimony regarding this matter to be untrue and their allegations of misconduct as it relates to this issue to be without merit.

Stroud alleges that Slayman wrongfully refused to allow Stroud access to the Defender contract. This allegation is, likewise, false. The testimony of the Board members establishes that the Board decreed that the Defender contract was to be kept confidential. Slayman was once again acting at their direction. The allegation made by Stroud is thus without merit.

⁴⁵ 39 Tr. P. 264-265, L. 9-12; p. 266, L. 8-18; p. 308, L. 7-18 (NOTE: her report references 45 as 39)

⁴⁶ <https://boardpolicyonline.com/?b=chester>

C. Providing false information to School Board members

The grievants alleged that Slayman did not inform the Board that the Defender employees present at a meeting to introduce the new security firm were not the actual officers who would be placed in the schools. Each of the four board members testified that they were aware of this fact at the time of the meeting. Thus, this allegation is without merit. **(Although Stroman testifies to this, it is still discredited by the fact that the four members were not all members of the board at the time.)**

The grievants also alleged that Slayman did not inform the Board that the Defender officers did not have arrest powers. Again, each of the four board members testified that they were are aware of this fact. Thus, this allegation is, likewise, without merit.

In other testimony relating to this issue, the Board members were very complimentary of Slayman's diligence in keeping the Board informed. Her efforts were lauded for calling each Board member individually as opposed to texting or emailing the group. There was no testimony from the Board members that Slayman ever misled them or failed to inform them of matters they needed knowledge of. Accordingly, I find no evidence to support the grievants allegations in this regard.

D. Racists remarks

Gardner, one of the five grievants, testified to two racist remarks purportedly made by Slayman to him. The first was regarding Slayman's trip to Idaho. The remark was purportedly to the effect that Idaho had few African-Americans and was Heaven. Gardner then repeated this remark to other grievants who accepted it for the truth. In fact, Gardner's allegations of this remark influenced Williams, who is also African-American and admittedly did not hear the remark, to sign the grievance. ⁴⁷ **(Please refer to Williams' complete testimony.)**

Slayman denied this allegation stating that she had commented on the sparse population in Idaho, which she compared to Heaven. Slayman admits that she stated that Idaho lacked diversity but denies that her statement regarding Heaven referred to the lack of diversity. Slayman is Hispanic and was always concerned about having a balance in diversity in the schools.⁴⁸ Slayman discussed the Idaho trip with S. Stroman when she returned. S. Stroman's account of that conversation corroborated Slayman's testimony.⁴⁹ **(Stroman's testimony that Slayman discussed diversity with her only corroborates Gardner's account. The hearing officer would have you believe that Slayman traveled to beautiful Idaho, was overcome by the beauty, overcome by the sparseness, and that her thoughts and concerns turned to that state's "lack" of diversity.)** S. Stroman went on to testify that she had never heard Slayman say anything derogatory about "any person, any race, any people".⁵⁰ S. Stroman concluded that the allegation took Slayman's comments out of context, just as the Bagley Report took Slayman's use of the vernacular out of context.⁵¹ Stroman further observed that Slayman had facilitated the promotion of African Americans into higher positions.⁵²

⁴⁷ Tr. p. 264-265, L. 18-3

⁴⁸ Tr. p. 1322-23, L. 24-14

⁴⁹ 43 Tr. p. 543-544, L. 9-18 (NOTE: Malane's report references 49 as 43)

⁵⁰ Tr. p. 602, L. 19-21

⁵¹ Tr.p.543, L.9-15

⁵² Tr. p. 545, L. 1-8

The second alleged remark was to the effect that the security officer for Louisville Elementary School had to be white. Slayman denied this and alluded that the officer actually placed in that school was black.⁵³ There was no further testimony regarding this allegation. **(What Slayman "alluded" to is not known, and should not be a finding.)**

In addition to the comments made by S. Stroman above, James, who is African American, also expressed that she did not believe these allegations.⁵⁴

Likewise, Slayman's administrative assistant, McConnell, who is also African American, testified that she had never witnessed Slayman acting in a racist manner or making racist comments. She further testified that Slayman had promoted more African Americans than any other superintendent that she had known.⁵⁵

Finally, King admitted that he had never heard her make racial remarks.⁵⁶

By the preponderance of the evidence, I find that these allegations are without merit.

E. Inappropriate discussion of District matters with local "breakfast club" members and adherence to their opinions (Not at issue. Please refer to OGC's Pre-Hearing Statement and Proposed Order of Public Reprimand)

During her tenure as Superintendent, Slayman regularly had breakfast with certain community leaders. Her senior cabinet referred to the people who participated in these breakfasts as "the breakfast club". Each of the five grievants testified that Slayman made decisions based upon these breakfast club meetings. Slayman invited her senior staff to have breakfast with her and these leaders, however, only two, namely King and Gardner, testified that they had attended. Both testified that they attended one breakfast.

When the consultants and the Board members were questioned at the hearing about the propriety of Slayman having breakfast with community leaders, the overwhelming response was that this was both proper and a good practice. Further, John Agee, one of the county leaders comprising the "breakfast club", testified that the discussions centered around news in the County, with a lot of emphasis placed on the fire service since Agee was the fire chief. Per Agee, Slayman never shared confidential District business in these breakfasts.

From evidence cited above, it appears that this allegation is based upon conjecture as opposed to actual fact since only two of the senior cabinet members ever attended these breakfasts and they both attended only one. I find that neither King nor Gardner had sufficient knowledge on the basis of one breakfast to know if District business was discussed. Accordingly, I find that this allegation has no merit.

⁵³ Tr. p. 1324, L. 2-16

⁵⁴ Tr. p. 959-960, L. 23-6

⁵⁵ Tr. p. 1027, L. 16-25

⁵⁶ Tr. p. 83, L. 8-14

II. Credibility Issues With Witnesses

A. Dr. Charles King

King has been involved in two matters that bring into question the truth and veracity of his testimony in this case. First, during Slayman's administration, King utilized the District's MiFi for personal use at his home without notice to or prior authorization by the District. When questioned about this by Slayman, he became very upset. (According to Slayman). The grievance was filed immediately thereafter and Slayman never got the opportunity to complete that discussion with him. (Hearing officer implies that King filed the grievance over MiFi...) Although King's defense was that he did not take a District cell phone when offered, this fact did not legitimize his appropriation of the District's MiFi.

The second incident occurred after Slayman's departure from the District. This incident involved King's clinical supervision of an employee who was seeking to upgrade her administrative certification. King gave the employee his password and allowed her access to his files where he was to observe and evaluate her. The employee accessed these files and prepared the reports that King was supposed to prepare. When this was discovered by the District, he denied having given the employee his password. However, the employee provided the email in which King did this. King left the employ of the District and was reported by the District to SCDE.⁵⁷ (What is extremely concerning is that the OGC has not been able to locate, in the record, that the "employee provided the email." The hearing officer appears to use this information from outside of this record. The only source of this information is from an unrelated matter before that came before this hearing officer and the SBE.)

In addition to the above, certain of the allegations espoused by King against Slayman have been conclusively proven to be false (i.e. namely those related to Slayman's truthfulness to the Board). (This implies the board testified. The full board did not testify.)

Finally, King aspired to be a district superintendent. This is made clear in Petitioner's Exhibit 13 at page 4 where he states "I like to think that I am ready to be a Superintendent and will have my own district one day". He also let this be known to Slayman's successor, Angela Bain.⁵⁸

Based upon all of the above, I do not find King's testimony to be credible in this matter.

B. Jeff Gardner

Like King, Gardner also had an interest in becoming superintendent. Gardner applied for the position of Superintendent in 2012 along with Slayman. He was never seriously considered for the position in that he was deemed unqualified and only given a courtesy interview.

According to the testimony of the four consultants, the four Board members and Slayman, Gardner

⁵⁷ Tr. p. 1089, L. 4-19

⁵⁸ Tr. p. 1086, L. 18-24

had problems completing his work on a timely basis. Some witnesses questioned his competency for the Assistant Superintendent position. Slayman had to address issues relating to Gardner's job performance with him during her tenure with the District. In her words, Gardner "struggled to keep all the balls in the air" and he was really frustrated.⁵⁹ Gardner was fearful of losing his job in that he was raising three children, two of which were in college.⁶⁰ Thus, Gardner had a motive to want Slayman gone.

Looking at the substance of his allegations against Slayman in light of other testimony at the hearing, it appears that certain of these allegations were false, taken out of context, or embellished. He then spread this information to others. Evidence of this is found in the testimony of Williams who signed the grievance because of Gardner's allegations of racial statements made by Slayman. **(Misleading. Please read Williams' full testimony).**

Based upon the above, I do not find Gardner's testimony to be credible.

C. Anna Stroud

Stroud's testimony at the hearing was the most venomous of the five grievants. **(Stroud testified that Slayman was a hard worker. All grievants expressed genuine concern for Slayman. The hearing officer omits this testimony. These omissions are highly misleading.)** In the Summer of 2015 just before the filing of the grievance, Slayman discovered that Stroud had knowingly taken pay raises in direct violation of an order by the Board that Stroud's salary was to be frozen until she completed certain educational requirements. This was an act of dishonesty and it brings into question the truth and veracity of her testimony in this matter. **(This was not established by the record. To the contrary, the budgets containing her salary were approved by the Board, a detail which the hearing officer omits.)**

It further establishes a motive for filing a grievance against Slayman in that Stroud was fearful of losing her job. The record in this case is resplendent with testimony by Board members and consultants critical of Stroud's job performance. Stroud was aware that the Board had discussed her termination on several occasions.

Finally, Stroud had strong ties to both the new sheriff and Hughes, neither of which favored Slayman. Stroud's husband worked for the new sheriff and was a prior SRO in the Chester schools. Stroud provided a significant amount of testimony regarding her affiliations with the new sheriff and Hughes as well as her opinions and fears regarding the failure to use SRO's in the schools. Certain allegations made by Stroud relating to the use of private security officers as opposed to SRO's were proven to false in subsequent testimony.

Based upon the above, I do not find Stroud's testimony to be credible.

CONCLUSION

⁵⁹ Tr. p. 1280, L. 3-16

⁶⁰ Tr. p. 238, L. 12-23

After reviewing all the testimony and exhibits presented in this case, I find that SCDE has failed to prove by a preponderance of the evidence that the allegations against Slayman are true. Slayman's witnesses were all credible and had nothing to gain by their testimony on behalf of Slayman. In contrast, three of the five grievants evidenced substantial credibility concerns. The remaining two were convinced to sign onto the grievance based upon the representations of others. While Slayman admittedly used phrases such as "I'll have to kill you", those phrases were used in the vernacular, were never meant as threats, and would not have been seen as a threat by a reasonable person.

The one issue that is concerning is the incident between Williams and Slayman. It appears from the testimony that the conversation between those two in August of 2013 became intense and Slayman admittedly used one of her common phrases in the vernacular. Williams admitted that she knew that Slayman did not mean the phrase literally (i.e. there was no intent on Slayman's part to harm Williams). While this was not an ideal choice of words, I do not believe that such rises to the level of unprofessional conduct. It has been well established that these phrases in the vernacular were a regular part of Slayman's speech. Notably, Slayman had vast experience in managing people over the years and this issue had never arisen in the past. This leads me to the conclusion that the use of the phrase in this incident was taken out of context. However, even if Williams' context is believed, Slayman has been punished in a manner that far exceeds any reasonable punishment for this type of infraction. Her career and reputation have been destroyed by the allegations in this grievance and the media frenzy that ensued. She will likely never work again.

Based on the preponderance of the evidence presented, I recommend that this action against Dr. Agnes Slayman's teaching certificate #134958 be dismissed.

The OGC believes the hearing officer has made her case against the five grievants. In order to justify the unjustifiable, she has had to omit critical facts and diminish other facts while inflating irrelevant ones. Conveniently, the hearing officer somehow determined that Slayman did say the more innocuous variety of threatening statements, while declaring that she did not say the most egregious and specific ones. This was a case about words and behavior. It was not about a "coup". It was not about politics. It was about workplace bullying. The hearing officer simply chose to overcomplicate this matter by making this case about the victims of bullying, rather than focusing on the alleged unprofessional behavior. In her zeal to find reasons why all FIVE greivants are not credible, she omits information, most importantly the improvement plan, and even had to eliminate the testimony of the "strongest employee at the district". The hearing officer even appears to pull in information from outside the record. These omissions are extremely uncharacteristic (with the exception of the Lunsford-Thomas matter) and are unfair to the process. But most importantly, the omissions are unfair to the grievants.

Ultimately, Slayman admits nothing and does not believe she has done anything wrong. When asked that question, she simply said she should have fought harder, that she became too familiar with her subordinates, and that she was sad. Tr. p. 1383, L. 11-20. After more than 1400 pages of testimony, that is simply unacceptable.

from the foreign language requirement of that college. The student had not been assessed for that disability while attending school in the District and Ligon testified that there was nothing that the District could now do with regard to this. However, Slayman continued to discuss this matter with her but phrased her comments in different ways. Slayman ultimately mentioned that the student's family may hire an attorney regarding this. Ligon testified that she felt pressured by this statement to do something she felt would be unethical. However, when Ligon's conversation with Slayman ended, Ligon testified that Slayman did not express any displeasure.

Slayman testified that she did not pressure her or coerce her, but was trying to make sure that the District was covered.

The OGC has criticized the fact that I did not give weight to Ligon's testimony. While I found her to be a credible witness, I did not find her testimony to be helpful in determining this matter. With regard to the circumstance where Ligon found Slayman's behavior to be intimidating, the testimony of Ligon and Slayman were both very credible and were not inconsistent. While Ligon may have found this type of questioning intimidating, Slayman was doing her due diligence to determine if there was a way to help the student and to determine if the District had any liability. Slayman's statement regarding the potential of the student's family hiring a lawyer telegraphed her concern about liability. Further, the fact that Slayman expressed no displeasure with Ligon at the conclusion of the conversation is evidence that there was no intent to pressure Ligon into a specified result. I see no evidence of misconduct in this instance. Ligon's testimony with regard to this matter is found at Tr. p. 470-476, L. 24-13. Slayman's testimony with regard to this matter is found at Tr. p. 1290-1292, L. 22-1.

In addition, Ligon's observations of distressed employees was not sufficient to attribute any misconduct to Slayman or, in the instance involving Gardner, to even link Slayman to the incident. However, out of an abundance of caution, I am adding these facts to my report.

Slayman presented the testimony of four consultants (two of which were previous employees under Slayman in Kershaw), two current school board members, two previous school board members, Slayman's administrative assistant, the current Chester School District Superintendent, two others who had dealings with Slayman as the Chester School Superintendent, and Slayman herself. Contrary to the OGC's assertions, all school board members who testified served at some point during Slayman's tenure. To make that point clear, I listed the tenure of each board member and how that member's tenure coincided with Slayman's tenure as superintendent on page 16 of my original report. As Slayman's witnesses began to testify, it became obvious that many of the issues cited by the five grievants were the product of misinformation or inaccuracies.

Of the complaints cited by the grievants, the most troubling was that of the hostile work environment and bullying. Since Slayman had served in supervisory roles in several positions with the Kershaw School District, I looked very carefully at the testimony of John Stiver (Stiver) and Robert Teal (Teal) in that they were former employees of Slayman in Kershaw. Notably, these

THE STATE OF SOUTH CAROLINA
ADMINISTRATIVE LAW COURT

Dr. Agnes Slayman,

Appellant,

v.

South Carolina Department of Education,

Respondent.

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

BRIEF OF APPELLANT

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STATEMENT OF THE ISSUES ON APPEAL

Dr. Agnes Slayman (“Dr. Slayman”), the Appellant, appeals the Order of Public Reprimand issued by the South Carolina State Board of Education (“SCDE”) on September 10, 2019.

The Public Order of Reprimand is in violation of constitutional and statutory provisions, made upon unlawful procedure, affected by other error of law, clearly erroneous in view of the reliable, probative, and substantial evidence on the whole record, and arbitrary or capricious or characterized by abuse of discretion or clearly unwarranted exercise of discretion. Dr. Slayman asserts that the State Board of Education committed serious errors of law based upon the following grounds:

- I. The SCDE erred in not dismissing the Complaint when it was filed on October 14, 2015.
- II. The Complaint processing and investigation by the SCDE violated Dr. Slayman’s Due Process rights and State Board Regulations and Procedures.
- III. The Hearing before the State Board of Education violated Dr. Slayman’s Due Process rights and State Board Regulations and Procedures.
- IV. The State Board of Education erred when it failed to consider the recommendations of the Hearing Officer that recommended the dismissal of the Complaint against Dr. Slayman.
- V. The State Board of Education erred in issuing the Public Order of Reprimand.

STATEMENT OF THE CASE

Pursuant to S.C. Code Ann. § 59-25-170, the SCDE notified Dr. Slayman of potential disciplinary action against her teaching certificate and informed her of her right to a hearing via letter dated March 28, 2018. Dr. Slayman timely requested a hearing and such was held over a period of five days on October 3, 2018, October 4, 2018, October 12, 2018, November 1, 2018,

and November 2, 2018. Scott Winburn, Deputy General Counsel, represented the SCDE during the pendency of the hearing. Shannon Polvi represented Dr. Slayman during the pendency of the hearing.

Dr. Slayman was accused of unprofessional conduct in the nature of workplace harassment and intimidation of employees. Dr. Slayman requested that no disciplinary action be taken against her certificate in that the allegations are untrue.

On April 19, 2019, the Hearing Officer issued a Report and Recommendation (“R&R”) recommending no disciplinary action be taken against Dr. Slayman’s certificate. The State Board of Education (“State Board”) disregarded the recommendation of the Hearing Officer and issued a Public Reprimand to Dr. Slayman on September 10, 2019.

Dr. Slayman is aggrieved by the Order issued by the State Board of Education. Dr. Slayman has exhausted all administrative remedies prior to this appeal.

Dr. Slayman timely filed her Notice of Appeal within thirty days of the Order issuance. The Court has jurisdiction over this appeal pursuant to S.C. Code Ann. § 59-25-260, S.C. Code Ann. § 1-23-380(B), and S.C. Code Ann. § 1-23-600(E). Pursuant to S.C. Code Ann. § 59-25-260, the State Board of Education filed a certified copy of the record.

STATEMENT OF THE FACTS¹

Dr. Slayman holds a valid South Carolina professional educator certificate and has over thirty-two years of experience. She has no prior record of disciplinary action with the State Board. She holds a Bachelor's, a Master's, and a Doctoral degree, all conferred upon her by the University of South Carolina. Her past educational experience includes being a special education teacher, a

¹ Due to thirty-page limitation in SCALC Rule 37, Dr. Slayman craves reference to the facts as described in the Hearing Officer’s Report and Recommendation and those memorialized in the Hearing Transcripts and exhibits used therein.

high school assistant principal, a middle school principal, a high school principal, Kershaw School District Assistant Superintendent for Curriculum and Instruction, and Chester County School District Superintendent.

Dr. Slayman was employed in the Kershaw School District for over 20 years. She was the first female high school principal in the history of that district.

Dr. Slayman was employed with the Chester County School District as the Superintendent in January 2012 and served in that capacity until her resignation on September 24, 2015. She was also the first female Superintendent in the history of the Chester County School District. Upon information and belief, Dr. Slayman was the first Hispanic Superintendent in the State of South Carolina.

On or about August 2015, Anna Stroud ("Stroud"), then Director of Finance, and Leonard Jeffers Gardner ("Gardner"), then Assistant Superintendent for Operations, called Dr. Rick Hughes ("Dr. Hughes"), a Chester School Board member, to advise him that Dr. Slayman's senior staff members intended to file a grievance against Dr. Slayman. Attorneys for the Board were contacted, and the Board authorized an investigation to be done. At this point, nothing in writing had been submitted by the grievants and the Board was acting on the verbal communication between Stroud, Gardner, and Dr. Hughes.

Betty Bagley ("Bagley") was hired to conduct the investigation. She was instructed by the Board that her investigation was restricted to interviews with the five senior staff members, as well as Slayman and Callie McConnell, the Superintendent's administrative assistant. A very short time frame was given for this investigation and Bagley was instructed not to prepare a written report, but to verbally report her findings to the Board. Bagley made written notes of the interviews she conducted, and these later became known as the "Bagley Report". Bagley delivered an oral report

to the Board on September 3, 2015. Bagley did not testify at Dr. Slayman's disciplinary hearing; however, her the Bagley Report were entered into evidence. (See ROA 1715-1723, Hearing Exhibit 14).

During Bagley's interview with Dr. Slayman, Bagley asked Dr. Slayman more than once if she would resign. Dr. Slayman told Bagley that she would not. There is no testimony in the record that suggests that Bagley was authorized to request Dr. Slayman's resignation. Dr. Slayman was never again asked to resign.

The grievants had met several times together and jointly planned to draft and issue the grievance as a planned group. McConnell, in a career employee with the District who has worked with several Superintendents, testified that she observed the grievants meeting together as a group and that she observed no basis for the allegations against Dr. Slayman.

A written letter was filed with the Board, dated September 8, 2015, addressed to the Board Chair, Denise Lawson, and signed by the five senior staff members: Gardner, Stroud, Dr. Charles King, former Assistant Superintendent for Instruction, Shawn Williams, former Chief Human Resource Officer, and Brooke Clinton, former Public Information Officer. The letter states:

We are formally filing an official grievance due to a hostile work environment, implications of ethical violations, and racial and threatening remarks by Dr. Agnes Slayman, Superintendent of the Chester County School District.

We are requesting a closed door meeting of the Board as a group to present our concerns to the Board of Trustees. We respectfully request that Dr. Slayman not be in attendance during this meeting.

(Record on Appeal ("ROA") 1672).

On September 21, 2015, the five grievants were allowed to express their grievances regarding Dr. Slayman to the Board in executive session. Dr. Slayman was not even told what the allegations were against her, and she was not notified or present at the grievants. Even after the

grievants had solely given their side of the story,² the Board as a body disbelieved these accusations, seeing for themselves that this was a conspiracy against Dr. Slayman, and Dr. Slayman had the votes to remain in her position as Superintendent.

Dr. Slayman voluntarily resigned thereafter, without the Board ever taking any action against her. Dr. Slayman resigned because she felt that she would not be able to supervise the grievants in the future or provide direction to the District in that her actions would constantly be questioned. Dr. Slayman believed that the turmoil these events had caused was not beneficial to anyone involved, so she was trying to make the best decision for the District when faced with such horrible circumstances. (Dr. Slayman Testimony,³ p. 1255, l. 4-11).

Dr. Slayman and the Board entered into an agreement whereby Dr. Slayman was employed as a consultant until June 30, 2016. The majority of the Board did not believe the claims made against Dr. Slayman and wanted to vote that the claims had "no merit". (James Testimony, p. 1050, l. 21). However, the Board was strongly advised by legal counsel that they should vote that the claims were "moot" because Dr. Slayman had resigned. (James Testimony, p. 1050, l. 16-24).

By letter dated October 14, 2015, SCDE received notice of Dr. Slayman's resignation and the allegations of the five employees. The Complaint was sent by the Interim District Superintendent, Dr. V. Keith Callicutt. The Board did not vote on this action and was not aware that Dr. Callicutt had sent the letter to SCDE. Thereafter, SCDE initiated an investigation into this

² Bagley's investigation excluded the positive feedback she received about Dr. Slayman and the Bagley Report excluded all of the rebuttal information given to her by Dr. Slayman and McConnell. (See ROA 1715-1723, Hearing Exhibit 14; see also Hearing Testimony of Dr. Slayman and McConnell). The self-evident focus of Bagley's investigation was to get only one side of the story, that being the grievants' side.

³ Some of the ROA page numbers seemed to get out of order, so in Appellant's Brief, the page numbers of a witnesses translate to the bates numbers in the Hearing transcript page numbers in the top right-hand corner. For example, Dr. Slayman Testimony,³ p. 1255, l. 4-11 is found at ROA 1339 (the number in the bottom right hand corner).

matter which ultimately culminated in the five-day hearing. The five grievants testified at the hearing. A summary of important facts about each of them, as well as the allegations made by each, is found in the Hearing Transcript and the Hearing Officer's R&R.

The events of this matter were chronicled in news reports and in postings on social media. The "Bagley Report" was leaked to media outlets around South Carolina and in other states. Dr. Slayman and certain Board members were followed and continually harassed by the press and others to the depth that Dr. Slayman and certain Board members feared for their safety.

Dr. Slayman has been unable to obtain employment since her resignation. Dr. Slayman was also harmed in that she did not get to complete her TERI, she had to begin drawing retirement early, and Dr. Slayman's earnings and future Social Security benefits are adversely impacted by not finding subsequent employment.

ARGUMENT

Standard of Review

Respondent is an agency under the Administrative Procedures Act, S.C. Code Ann. § 1-23-110 *et seq.* ("APA"); therefore, the APA's standard of review governs this appeal. S.C. Code Ann. §§ 1-23-380 and -600(D); S.C. Code Ann. § 8-17-340. "The scope of judicial review in ... cases arising from the final decision of state agencies is governed by section 1-23-380 of the South Carolina Code." *Trowell v. S.C. Dep't of Pub. Safety*, 384 S.C. 232, 235, 681 S.E.2d 893, 895 (Ct. App. 2009). Section 1-23-380(5) provides:

The court may not substitute its judgment for the judgment of the agency as to the weight of the evidence on questions of fact. The court may affirm the decision of the agency or remand the case for further proceedings. The court may reverse or modify the decision if substantial rights of the appellant have been prejudiced because the administrative findings, inferences, conclusions, or decisions are:

- (a) in violation of constitutional or statutory provisions;
- (b) in excess of the statutory authority of the agency;

- (c) made upon unlawful procedure;
- (d) affected by other error of law;
- (e) clearly erroneous in view of the reliable, probative, and substantial evidence on the whole record; or
- (f) arbitrary or capricious or characterized by abuse of discretion or clearly unwarranted exercise of discretion.

S.C. Code Ann. § 1-23-380(5).

The party challenging an agency decision has the burden of proving convincingly that the agency's decision is unsupported by substantial evidence. *Waters v. S.C. Land Rs. Conservation Comm'n*, 467 S.E. 219, 467 S.E.2d 913 (1996). Substantial evidence is not a mere scintilla of evidence nor the evidence viewed blindly from one side of the case, but is evidence which, considering the record as a whole, would allow reasonable minds to reach the same conclusion as the agency. *Friends of the Earth v. Pub. Serv. Comm'n of S.C.*, 387 S.C. 360, 692 S.E.2d 910 (2010).

I. The SCDE erred in not dismissing the Complaint when it was filed on October 14, 2015.

The Complaint was purportedly filed by Chester County School District on October 14, 2015, yet in actuality it was filed by Dr. Callicutt, the Interim Superintendent who had no personal knowledge of the allegations therein the Complaint that he filed against Dr. Slayman, and it was filed without the knowledge and approval of the Chester County School Board. No one with personal knowledge of the allegations were the complaining parties to the SCDE.

a. The Complaint by Dr. Callicutt was improper under State Board Regulation 43-58.1.

State Board Regulation 43-58.1 ("R43-58.1") is the State Board policy for reporting terminations of certain district employees. In relevant part, R43-58.1 states:

A district superintendent, on behalf of the local board of education, shall report to the Chair of the State Board of Education and the State Superintendent of Education, the name and certificate number of any certified educator who is

dismissed, resigns, or is otherwise separated from employment with that district **based on allegations of misconduct including, but not limited to, misconduct involving drugs, sexual misconduct, the commission of a crime, immorality, moral turpitude, or dishonesty**, *that is reasonably believed by the district superintendent to constitute grounds for revocation or suspension of the certificate issued to the educator by the State Board.* This report is required notwithstanding any termination agreement to the contrary that the district board of trustees or superintendent may enter into with the educator. The reasons for the educator's termination of employment with the district shall also be provided along with all evidence in the possession of the district relating to the termination.

R43-58.1 (emphasis added). It is vital to analyze the bolded and italicized portions of the regulation because a plain reading analysis is pertinent here.

The principles of statutory construction similarly apply to regulatory construction. “The cardinal rule of statutory construction is to ascertain and effectuate the intent of the legislature.” *S.C. Dep't of Soc. Servs. v. Boulware*, 422 S.C. 1, 7–8, 809 S.E.2d 223, 226 (2018) quoting *Hodges v. Rainey*, 341 S.C. 79, 85, 533 S.E.2d 578, 581 (2000); *Michael P. v. Greenville Cty. Dep't of Soc. Servs.*, 385 S.C. 407, 414, 684 S.E.2d 211, 215 (Ct. App. 2009). “What a legislature says in the text of a statute is considered the best evidence of the legislative intent or will. Therefore, the courts are bound to give effect to the expressed intent of the legislature.” *Id.* quoting *Hodges*, 341 S.C. at 85, 533 S.E.2d at 581 (quoting Norman J. Singer, *Sutherland Statutory Construction* § 46.03 at 94 (5th ed. 1992)). “Appellate courts must follow a statute's plain and unambiguous language, and when the language is clear, ‘the rules of statutory interpretation are not needed and the court has no right to impose another meaning.’” *Id.* Accordingly, the Court should apply the plain meaning of R43-58.1.

i. The allegations of misconduct are not within the context of those intended by R43-58.1.

Misconduct is not fully defined within R43-58.1, but the clear intent of the drafters was for this reporting regulation to pertain to misconduct that would amount to conduct so egregious that

it would result in the suspension or revocation of an educator's license. Here, Dr. Slayman's license was not suspended or revoked, only a Public Reprimand was recommended and issued by the SCDE.

The intent to limit mandatory reporting is clear because the regulation states it is intended to apply to misconduct involving drugs, sexual misconduct, the commission of a crime, immorality, moral turpitude, or dishonesty. In a nutshell, the intent of the regulation is to ensure that sexual predators and educators involved in unlawful activities, like stealing money from a school district, do not relocate from one school district to another without there being some record of a pattern of such alarming conduct. No such issues are involved in this case.

ii. The Interim Superintendent could not have a reasonable belief that there were grounds for revocation or suspension of Dr. Slayman's certificate.

Dr. Slayman voluntarily resigned in good standing as superintendent. (ROA 974-975 (James Testimony p. 890, l. 20 - p. 891, l. 9)). After the grievance was filed and heard by the Chester County School Board and after the Bagley Report was discussed on September 8, 2015, the Chester County School Board unanimously reached a consensus to allow Dr. Slayman to return to work. Thereby, the Chester County School Board did not act on the Bagley Report and the false allegations about Dr. Slayman memorialized therein were not adopted by the Chester County School District. Furthermore, on September 30, 2015, the Chester County School Board voted to find the grievance "moot" and the majority of the Board wanted to find "no merit".

Also, on September 30, 2015, the Chester County School District and Dr. Slayman entered into a binding contract. Thereafter, the Chester County School District violated that contract. The pertinent part of Term 8 to this issue is "the District will instruct the Board and administrators not to publicly disparage Dr. Slayman..." and Term 10 states, "the parties recognize that the promises

and covenants contained herein are made in consideration of the mutually agreed separation of Dr. Slayman's employment and are in no way an admission of wrongdoing by either party."

Dr. Slayman was not fired. Dr. Slayman was not found by the Chester County School Board body to have engaged in the conduct alleged in the grievance, and the Chester County School District contractually agreed to that on September 30, 2015. Furthermore, Dr. Slayman continued employment with Chester County School District as a consultant for the time period of September 24, 2015 through June 20, 2016.

Yet, on October 14, 2015, Dr. Callicutt, the Interim Superintendent with no personal knowledge of what he was complaining about, intentionally acted expressly contradictory to the District's contractual and factual findings by falsely alleging that Dr. Slayman had engaged in conduct requiring a report per R43-58.1. The filing of the Complaint was a voluntary report intended to harm Dr. Slayman and the Complaint was filed in direct violation of the contractual agreement executed by Dr. Slayman and the District on September 30, 2015.

Dr. Callicutt's complaint was filed by Chester County School District on October 14, 2015, without the knowledge and approval of the Chester County School Board. Even then Board Chair Denise Lawson is quoted in a January 14, 2016 News & Reporter article as stating she was "not aware of any investigation on Slayman by the state Department of Education". Maggie James, a Chester County School Board member, testified in Dr. Slayman's hearing.

Winburn Q: ...What is your understanding of the duties to report allegations of unprofessional conduct to the State Department? I mean, is it your belief that Dr. Keith Callicutt broke a law, violated in some ethics? What is your position at the Keith Callicutt's report of the allegations?

James A: Being that he was the interim, he was not there firsthand, anything that he would have written would have been, as you, per se, hearsay. So why was he to be believed in sending a letter down here without authorization from the board, and not two members to send that type of letter down here requesting that.