

BEFORE THE ARKANSAS DEPARTMENT OF EDUCATION
STATE BOARD OF EDUCATION

November 12, 2015

E X H I B I T S

A-9: WAIVER REQUEST - MELANIE J. WILLIAMS

EXHIBIT ONE (1)
PLSB File

A-10: WAIVER REQUEST - DANNA M. STROZYK

EXHIBIT ONE (1)
Emails between PLSB and Ms. Strozyk re: Waiver Hearing
(10/21/15)

A-11: WAIVER REQUEST - SHARON DAVIS-WILLIAMS

PLSB EXHIBIT ONE (1)
PLSB File

EDUCATOR EXHIBIT ONE (1)
Educator's File

A-12: WAIVER REQUEST - KERRI WILLIAMS

PLSB EXHIBIT ONE (1)
PLSB Correspondence

EDUCATOR'S EXHIBIT ONE (1)
Timeline of Events, Georgia Legal Records,
Misc. Correspondence

(cont.)

A-13: WAIVER REQUEST - BRUCE MADDOX

PLSB EXHIBIT ONE (1)

Statement by Mr. Maddox and Character References

EDUCATOR'S EXHIBIT ONE (1)

Educator's File

C E R T I F I C A T E

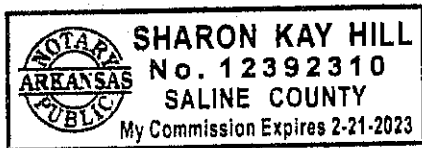
I, SHARON K. HILL, a Certified Court Reporter and Notary Public, do hereby certify that the exhibits contained herein, as listed above, are true and correct copies of the exhibits provided to me during the captioned proceeding.

WITNESS MY HAND AND SEAL THIS DATE: November 20, 2015.



Sharon K. Hill

SHARON K. HILL, CCR
Certified Court Reporter
Certificate No. 670





ARKANSAS
DEPARTMENT
OF EDUCATION

Arkansas Professional
Licensure Standards Board

Integrity ■ Knowledge ■ Professionalism

ADE Case ID: 3041335

August 19, 2015

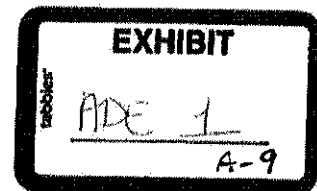
PERSONAL AND CONFIDENTIAL

Via Regular and Certified Mail: 91 7199 9991 7035 6965 5413

Ms. Melanie J. Williams



RE: Child Maltreatment Registry



Dear Ms. Williams:

Our office has been notified of a true finding against you from the Child Maltreatment Central Registry (the "registry") concerning: **Inadequate Supervision; 09/09/2014**. With a "true" finding on the registry, you are ineligible for licensure and employment in Arkansas public schools. Ark. Code Ann. §§ 6-17-410 and 6-17-411(b)(1)(B). As a result, the Department will recommend that the State Board revoke or not re-issue your license.

If you believe you are eligible to have your name removed from the registry, you should contact the **Department of Human Services, 501-682-0405**, for information concerning that process. You should advise this office **within fourteen (14) days** of the date of this letter that you have started the name removal process with DHS. If you are successful in getting your name removed from the registry, our office may be able to withdraw this letter.

You are entitled to a waiver hearing before the State Board of Education regarding your ineligibility for licensure and employment with an Arkansas public school as a result of the "true" finding. Ark. Code Ann. § 6-17-410(e). Please submit your written request for a waiver hearing to this office **within thirty (30) days of the date of this letter**. If you begin a process for name removal during that time, your appeal with the State Board of Education will be placed on hold pending the outcome of the DHS name removal process.

Alternatively, you may consent to surrender your license. A form for that surrender has been enclosed. The consent to surrender your license would be placed on the State Board's consent agenda at the next possible meeting date. The result would be permanent revocation of your license.

Arkansas Department of Education, Professional Licensure Standards Board
Four Capitol Mall Box 30, Little Rock, AR 72201
(501) 371-8014 main office; (501) 682-3781 fax

The contents of this message may be protected by attorney client privilege, state, or federal law from public disclosure. If you are not the intended recipient you are notified that disclosing, copying, and distributing may be strictly prohibited.

If you have any questions, please feel free to contact me by phone at (501) 682-0166 or by e-mail at Jennifer.Liwo@arkansas.gov.

Sincerely,
Jennifer N. Liwo
Jennifer N. Liwo
Staff Attorney, PLSB/Educator Licensure

Arkansas Department of Education, Professional Licensure Standards Board

Four Capitol Mall Box 30, Little Rock, AR 72201

(501) 371-8014 main office; (501) 682-3781 fax

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Jennifer Liwo (ADE)

From: Melanie Williams [REDACTED]
Sent: Monday, August 31, 2015 3:32 PM
To: Jennifer Liwo (ADE)
Subject: Request for Waiver from Melanie Williams

Hi Ms. Liwo,

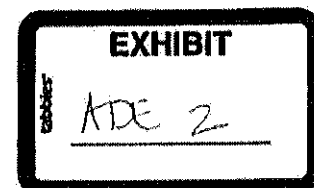
I received a letter notifying me of a recommendation to revoke my Arkansas teaching license. I am writing to request a hearing for a waiver of the offense on file.

I have hired a lawyer to represent me, and his name is Steve Smith. His office address is [REDACTED] Little Rock AR 72211, and the phone number is [REDACTED]. If I need to email this letter to another official as well please let know. Also, if there are any follow up actions I need to complete, please notify me. Thank you for your cooperation.

Kindest regards,

Melanie Williams

[REDACTED]



Jennifer Liwo (ADE)

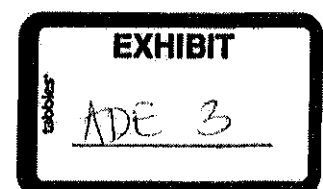
From: Jennifer Liwo (ADE)
Sent: Tuesday, September 08, 2015 2:18 PM
To: 'Melanie Williams'
Subject: Letter Acknowledging Request for State Board Waiver Hearing
Attachments: Letter Acknowledging Request for Waiver Hearing.pdf

Ms. Williams,

Please see the attached letter concerning your request for a waiver hearing. The letter will also be mailed to you tomorrow.

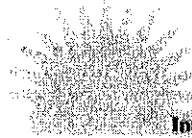
Jennifer N. Liwo
PLSB Attorney
Arkansas Department of Education
Professional Licensure Standards Board
4 Capitol Mall, Box 30
Little Rock, AR, 72201
Telephone: (501) 682-0166
Fax: (501) 682-3781
E-mail: Jennifer.Liwo@arkansas.gov

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ARKANSAS DEPARTMENT OF EDUCATION



*Arkansas Professional
Licensure Standards Board*

Integrity ■ Knowledge ■ Professionalism

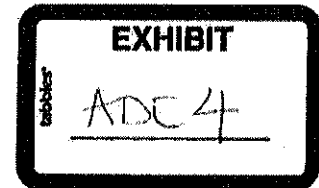
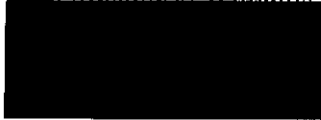
AELS CID: 3041335

September 9, 2015

PERSONAL AND CONFIDENTIAL

Via Regular Mail and Certified Mail: 91 7199 9991 7035 6965 8483

Ms. Melanie J. Williams



Re: Waiver Hearing Request

Dear Ms. Williams:

I have received your letter requesting a waiver hearing before the Arkansas State Board of Education ("Board") concerning the following disqualification:

DHS True Finding; Inadequate Supervision; 09/09/2014

The hearing is scheduled **for October 8, 2015**. The Board meets at **10:00 a.m.** in the Auditorium of the Arkansas Department of Education – Arch Ford Education Building, Four Capitol Mall, Little Rock, 72201. The hearings are typically held at the end of the agenda. As the time at which any agenda item is heard is within the Board's discretion, I am unable to tell you exactly when your matter will be heard.

The information considered by the Board at the hearing includes, but is not limited to:

- Age of the educator at the time of the offense;
- The circumstances surrounding the offense;
- The length of time since the offense;
- Subsequent work history;
- Employment references;
- Character references; and/or
- Other evidence demonstrating that the applicant does not pose a threat to the health or safety of school children or school personnel.

Arkansas Department of Education, Professional Licensure Standards Board

Four Capitol Mall Box 30, Little Rock, AR 72201

(501) 371-8014 main office; (501) 682-3781 fax

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Please provide me with a written statement and any supporting documents that at a minimum address those considerations, including the names and phone numbers of persons who may verify information contained in your statement or documentation. **The aforementioned written statement and document(s) must be provided no later than Wednesday, September 16, 2015.**

Enclosed is an excerpt of Section 8 from the Rules Governing Background Checks and Licensure Revocation. Please read the excerpt as it applies to the hearing process. The full content of the rules can be viewed online at <http://www.arkansased.gov/divisions/legal/rules> under Rules – Current.

You may, but are not required to, be represented by an attorney at any stage of this process.

If you have any questions, feel free to contact me by phone at (501) 682-0166 or by e-mail at Jennifer.Liwo@arkansas.gov.

Sincerely,

Jennifer N. Liwo

Jennifer N. Liwo
Staff Attorney, Ethics & Licensure

Enclosures (*Section 8-Rules Governing Background Checks and Licensure Revocation, Requesting a Waiver Hearing*)

cc: Ivy Pfeffer, Assistant Commissioner, HR/Educator Licensure
Darrick Williams, Director of Educator Licensure

*Arkansas Department of Education, Professional Licensure Standards Board
Four Capitol Mall Box 30, Little Rock, AR 72201
(501) 371-8014 main office; (501) 682-3781 fax*

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- 7.06 After making its decision, the State Board shall reduce its decision to writing and shall mail copies of the decision to the Fiscal Officer or Applicant and the Superintendent of the affected school district.

8.00 STATE BOARD HEARING PROCEDURES

- 8.01 Each party shall exchange exhibits and witness lists thirty (30) calendar days before the scheduled hearing date, unless both parties agree to a shorter period of time.
- 8.02 Requests for subpoenas must be received in the Office of Legal Counsel not less than ten (10) calendar days before the hearing date.
- 8.03 Each party will have the opportunity to present an opening statement of no longer than five (5) minutes, beginning with the representative of the Department of Education. The Chairperson of the State Board may, only for good cause shown and upon the request of either party, allow either party additional time to present their opening statements.
- 8.04 Each party will be given twenty (20) minutes to present their cases, beginning with the representative of the Department of Education. The Chairperson of the State Board may, only for good cause shown and upon the request of either party, allow either party additional time to present their cases.
- 8.05 Every witness giving oral testimony must be sworn under oath by the court reporter and shall be subject to direct examination, cross examination, and questioning by the State Board.
- 8.06 For the purposes of the record, documents offered during the hearing by the Department of Education shall be clearly marked in sequential, numeric order (1, 2, 3).
- 8.07 For the purposes of the record, documents offered during the hearing by the appealing public school district, open-enrollment public charter school, Applicant, or licensee shall be clearly marked in sequential, alphabetic letters (A, B, C).
- 8.08 The Department of Education shall have the burden of proving, by a preponderance of the evidence, that cause for the proposed licensure action exists, and that the recommended disposition from the Department be adopted.
- 8.09 While the scope of each party's presentation ultimately lies within the Board Chairperson's discretion, case presentation should be arranged in such a way as to avoid redundant testimony.

- 8.10 After both parties have presented their cases, the State Board may allow each party to present limited rebuttal testimony.
- 8.11 After making its decision, the State Board shall reduce its decision to writing and shall mail copies of the decision to each party, each party's attorney, and the superintendent or director of any interested public school district or open-enrollment public charter school.
- 8.12 The Board's written decision shall constitute the final agency action for purposes of judicial review pursuant to the Arkansas Administrative Procedure Act, Ark. Code Ann. § 25-15-201 *et seq.*



ARKANSAS DEPARTMENT OF EDUCATION

REQUESTING A WAIVER OF A DISQUALIFYING OFFENSE

The Arkansas Department of Education has received information indicating that you are ineligible for licensure as outlined in Ark. Code Ann. § 6-17-410 et seq.

Ark. Code Ann. § 6-17-410

provides that the Department of Education shall not issue a first-time license nor renew an existing license and shall revoke any existing license not up for renewal of any person who has a true report in the Child Maltreatment Central Registry or has pled guilty or nolo contendere to or has been found guilty of any of [certain listed] offenses, *including offenses which have been expunged or pardoned.*

Ark. Code Ann. § 6-17-411

requires a background check for initial employment with a charter school, school district, or education service cooperative.

You are entitled to a hearing in front of the State Board of Education regarding denial of your license.

Ark. Code Ann. § 6-17-410(f) authorizes the State Board to grant waivers of the licensure eligibility provisions of § 6-17-410(c) upon request of an affected applicant for licensure.

State Board of Education meetings occur once a month, at **10:00 a.m.** in the Auditorium of the Arkansas Department of Education –Arch Ford Education Building, Four Capitol Mall, Little Rock, AR, 72201. Meeting dates may be found at: http://www.arkansased.org/events/event_categories/state-board-of-education.

You may but are not required to be represented by an attorney at any stage of this process.

1 Request A Hearing

To request a hearing for a waiver of the disqualifying offense, you must submit your **written request** to the Department by mail, fax, or email, **within thirty (30) days** of the date you are notified of the disqualification.

2 Provide Documentation

The Department will confirm your request for a waiver and ask you to provide a written statement and any supporting documents that at a minimum address the circumstances that the Board will consider (see STEP 3), including the names and phone numbers of persons who may verify information contained in your statement or documentation. You must also provide a signed and notarized form providing authorization for the release of criminal records from courts and law enforcement. If your documentation is received less than six (6) weeks before the scheduled State Board meeting the matter will be postponed until after all documentation is received and reviewed by the Department.

3 Accept Or Reject The Department's Recommendation

After reviewing the documentation received from you or from other agencies, the Department will advise you of its decision to:

- Recommend a waiver to the State Board, including any conditions for licensure, such as:

- Probation or suspension for a specific period of time;
- Counseling, rehabilitation, or training;
- Background check at end of probation or suspension;
- No other disqualifying offenses or ethics violations during the probation or suspension period;
- Recommend that the State Board not issue, not renew, or revoke the license as applicable; or
- Decline to make a recommendation.

You will be given the opportunity to accept or reject the recommendation.

- If you **accept** the recommendation, the matter will be placed on the State Board's consent agenda. The consent agenda is voted on at that public meeting, and therefore, any documents presented to the State Board are public. If the matter is submitted on the consent agenda, you do not have to appear at the meeting. However, sometimes the State Board members have questions, and you may want to be there to respond to those questions. The State Board has the final decision and may accept a recommendation on the consent agenda or reject the recommendation and afford the educator the opportunity for a hearing at a later date.
- If you **reject** the recommendation you will proceed to a hearing.

4 State Board Hearing

If you request a hearing, you should appear at the meeting and be prepared to present your case and answer questions from the State Board members. If you request a hearing and do not appear, the State Board may decide the matter without you being present. Hearings are conducted at a public meeting of the State Board that is videoed by live streaming and archived. All documents provided to the State Board are public record. You should consult the Rules Governing Background Checks and Licensure Revocation for information on the hearing process (Section 8). The rules are online at <http://www.arkansased.org/> under Rules – Current.

The circumstances that the State Board may consider includes, but is not limited to:

- The age at which the crime or incident was committed
- The circumstances surrounding the crime or incident
- The length of time since the crime or incident
- Subsequent work history
- Employment references
- Character references
- Other evidence demonstrating that the applicant does not pose a threat to the health or safety of school children or school personnel.

The State Board typically makes a decision at the time of the State Board meeting at which the consent agenda or hearing is considered.

You may obtain further information by contacting:

Jennifer N. Liwo
 Staff Attorney, PLSE/Ethics & Licensure
 Arkansas Department of Education
 Four Capitol Mall Box 30
 Little Rock, AR 72201
 (501) 682-0166 voice; (501) 682-3781 fax
Jennifer.Liwo@arkansas.gov

Jennifer Liwo (ADE)

From: Jennifer Liwo (ADE)
Sent: Wednesday, October 21, 2015 2:33 PM
To: 'Danna Strozyk'
Cc: Cheryl Reinhart (ADE); Jean Robertson (ADE)
Subject: RE: Wavier Hearing

Ms. Strozyk,

Thank you for letting me know.

Jennifer N. Liwo
PLSB Attorney
Arkansas Department of Education
Professional Licensure Standards Board
4 Capitol Mall, Box 30
Little Rock, AR, 72201
Telephone: (501) 682-0166
Fax: (501) 682-3781
E-mail: Jennifer.Liwo@arkansas.gov

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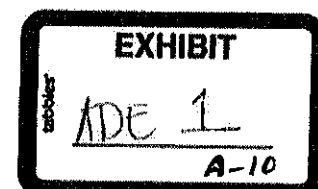
From: Danna Strozyk
Sent: Wednesday, October 21, 2015 12:34 PM
To: Jennifer Liwo (ADE)
Subject: Wavier Hearing

Ms. Liwo,

I received your letter outlining the date and time of the waiver hearing. I do however regret to inform you that I must decline the hearing. I appreciate your time and help in my situation. If you need anything further, please feel free to contact me at

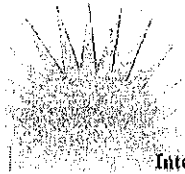
Sincerely,

Danna Strozyk





ARKANSAS
DEPARTMENT
OF EDUCATION



Arkansas Professional
Licensure Standards Board

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AELS CID: 26887

July 14, 2015

PERSONAL AND CONFIDENTIAL

Ms. Sharon Williams
[REDACTED]

VIA REGULAR MAIL AND CERTIFIED MAIL

RETURN RECEIPT REQUESTED NO.: 91 7199 9991 7035 6965 2528

RE: Revocation of your Arkansas teaching license

Dear Ms. Williams:

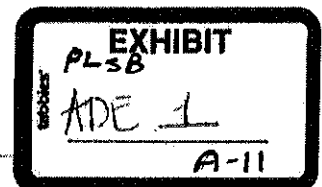
We have received the following information that reveals a disqualifying offense for licensure under Ark. Code Ann. § 6-17-410:

Date of conviction:	April 14, 2015
Nature of offense:	Georgia RICO Act violation
Arresting Agency:	Fulton County, GA Sheriff's Office

Arkansas law provides that the State Board of Education shall not issue or renew the license of any person who pleads guilty to certain enumerated offenses. Ark. Code Ann. § 6-17-410(c). In addition, you are ineligible for employment in any public school under Ark. Code Ann. § 6-17-411. Therefore, the Department will recommend that the State Board of Education **revoke** your license.

You are entitled to a hearing before the State Board of Education regarding denial of your license. Ark. Code Ann. § 6-17-410(f) authorizes the State Board to grant waivers of the licensure eligibility provisions of § 6-17-410(c) upon request of an affected applicant for licensure. To request a hearing for a waiver of the disqualifying offense, you must submit your written request to this office, by mail or by email, **within thirty (30) days** of the date of this letter.

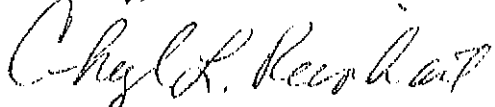
Arkansas Department of Education, Professional Licensure Standards Board
Four Capitol Mall Box 30, Little Rock, AR 72201
(501) 371-8014 main office; (501) 682-3781 fax



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If you have any questions, please feel free to contact me by phone at (501) 682-9983, or by email at Cheryl.Reinhart@arkansas.gov.

Sincerely,



Cheryl L. Reinhart
Director, PLSB

cc: Ivy Pfeffer, Asst. Commissioner
Karli Saracini, Director, Educator Licensure

*Arkansas Department of Education, Professional Licensure Standards Board
Four Capitol Mall Box 30, Little Rock, AR 72201
(501) 682-8014 main office; (501) 682-3781 fax*

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MANN & MORAN, PC

Attorneys

August 27, 2015

VIA CERTIFIED MAIL RETURN

RECEIPT REQUESTED NO.

7015 0640 0003 1866 0067

VIA FACSIMILE TO Cheryl L. Reinhart

(501) 682-3781

VIA E-MAIL TO:

Cheryl.Reinhart@arkansas.gov

Cheryl L. Reinhart, Director, PLSB
Arkansas Department of Education
Four Capitol Mall
Box 30
Little Rock, Arkansas 72201

**RE: Sharon Davis-Williams
Request for Hearing**

EXHIBIT

ADE 2

Dear Ms. Reinhart:

On or about July 30, 2015, Sharon Davis-Williams received your July 14, 2015, Notice of License Revocation & Right to Hearing pursuant to Ark. Code Ann. 6-17-410 (e)(1). Your July 14, 2015, Notice of License Revocation contends that the basis for the proposed license revocation is due to a disqualifying offense to which Sharon Davis-Williams pled guilty. Contrary to your contention, Sharon Davis-Williams' has never pled guilty to a disqualifying offense and the Georgia RICO Act violation to which you refer remains unresolved at this time.

Pursuant to Ark. Code Ann. 6-17-410 (e)(2) and within the thirty (30) day statutory time limit, Sharon Davis-Williams hereby formally exercises her right to an evidentiary hearing before the State Board of Education on the issue of her license revocation and a hearing for a waiver of the alleged disqualifying offense as provided for in Ark. Code Ann. 6-17-410 (f).

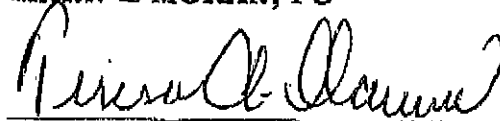
All future correspondence and notices surrounding this proposed license revocation and the requested hearing should be directed to my attention at the

address below. Additionally, I may be reached via e-mail at:
tma1234@bellsouth.net.

Should you have any questions or require any additional information,
please to not hesitate to contact me.

Your assistance is appreciated.

Sincerely,
MANN & MORAN, PC

A handwritten signature in cursive script, appearing to read "Teresa A. Mann", written over a horizontal line.

Teresa A. Mann

cc: Sharon Davis-Williams



ARKANSAS DEPARTMENT OF EDUCATION

Arkansas Professional
Licensure Standards Board

Integrity ■ Knowledge ■ Professionalism

AELS CID: 26887

September 1, 2015

PERSONAL AND CONFIDENTIAL

Via Regular Mail and Certified Mail: 91 7199 9991 7035 6965 8162

Ms. Teresa A. Mann
Mann & Moran, PC
1618 Thompson Avenue
East Point, GA 30344

Re: Waiver Hearing Request

Dear Ms. Mann:

I have received your letter requesting a waiver hearing before the Arkansas State Board of Education ("Board"). The waiver hearing will concern your client's conviction on the following offense:

Georgia RICO Act Violation

The hearing is scheduled for November 12, 2015. The Board meets at 10:00 a.m. in the Auditorium of the Arkansas Department of Education – Arch Ford Education Building, Four Capitol Mall, Little Rock, 72201. The hearings are typically held at the end of the agenda. As the time at which any agenda item is heard is within the Board's discretion, I am unable to tell you exactly when your client's matter will be heard.

The information considered by the Board at the hearing includes, but is not limited to:

- Age of the educator at the time of the offense
- The circumstances surrounding the offense
- The length of time since the offense
- Subsequent work history
- Employment references
- Character references
- Other evidence demonstrating that the applicant does not pose a threat to the health or safety of school children or school personnel.



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Please provide me with a written statement and any supporting documents that at a minimum address those considerations, including the names and phone numbers of persons who may verify information contained in your statement or documentation. **The aforementioned written statement and document(s) must be provided no later than Wednesday, October 21, 2015.**

I have enclosed an excerpt from the Rules Governing Background Checks and Licensure Revocation. Please read Section 8 of these rules as they apply to the hearing process. The full content of the rules may also be viewed online at <http://www.arkansased.org/> under Rules – Current.

If you have any questions, feel free to contact me by phone at (501) 682-0166 or by e-mail at Jennifer.Liwo@arkansas.gov.

Sincerely,
Jennifer N. Liwo
Jennifer N. Liwo
Staff Attorney, Ethics & Licensure

Enclosures (*Excerpt-Section 8 of the Rules Governing Background Checks and Licensure Revocation, Requesting a Waiver of a Disqualifying Offense*)

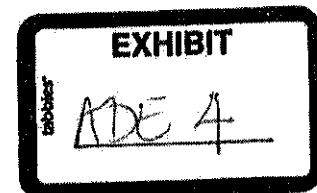
cc: Ivy Pfeffer, Assistant Commissioner, HR/Educator Licensure
Darrick Williams, Director of Educator Licensure

*Arkansas Department of Education, Professional Licensure Standards Board
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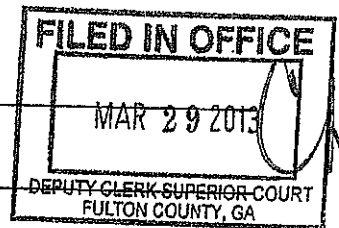
INDICTMENT FILED IN FULTON SUPERIOR COURT, GEORGIA

Specifically Count I-Pages 9-18, 21, and 60



INDICTMENT

Clerk No. _____



FULTON SUPERIOR COURT

THE STATE OF GEORGIA

V.

BEVERLY HALL Ct 1, 2, 3, 18
MILLCENT FEW Ct 1, 19
SHARON DAVIS-WILLIAMS Ct 1, 6-8
TAMARA COTMAN Ct 1, 4
MICHAEL PITTS Ct 1, 5
CHRISTOPHER WALLER Ct 1, 9-11, 16
GREGORY REID Ct 1, 9, 14, 15, 17
SANDRA WARD Ct 1, 9, 11, 12
STARLETTE MITCHELL Ct 1, 9, 13, 14
KIMBERLY ODEN Ct 1, 9
ARMSTEAD SALTERS Ct 1, 20, 21, 23
SHERIDAN ROGERS Ct 1, 20, 22
DANA EVANS Ct 1, 24, 25, 28, 31
ANGELA WILLIAMSON Ct 1, 24, 32, 33, 36
DERRICK BROADWATER Ct 1, 24, 26, 29, 34
SHAYLA SMITH Ct 1, 24, 26, 35
DESSA CURB Ct 1, 27, 30
LERA MIDDLEBROOKS Ct 1, 37, 39, 40
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O.C.G.A. § 16-10-20
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TRUE BILL

March 29, 20 13

Dandi. Croy
Grand Jury Foreperson

PAUL L. HOWARD, JR., District Attorney

The Defendant waives copy of
indictment, list of witnesses,
formal arraignment and pleads
_____ Guilty.

Defendant

Attorney for Defendant

Assistant District Attorney

This ____ day of _____, _____

The Defendant waives copy of
indictment, list of witnesses,
formal arraignment and pleads
_____ Guilty.

Defendant

Attorney for Defendant

Assistant District Attorney

This ____ day of _____, _____

The Defendant waives copy of
indictment, list of witnesses,
formal arraignment and pleads
_____ Guilty.

Defendant

Attorney for Defendant

Assistant District Attorney

This ____ day of _____, _____

STATE OF GEORGIA, COUNTY OF FULTON

IN THE SUPERIOR COURT OF SAID COUNTY

THE GRAND JURORS, selected, chosen and sworn for the County of Fulton, to wit:

- | | |
|----------------------------------------|---------------------------------------|
| 1. Danielle M. Conley, Foreperson | 14. Kelton, Melissa J. |
| 2. Ronald J. Greer, Asst. Foreperson | 15. Lotton, Robert C. |
| 3. Regina Trolman, Secretary | 16. Loi, Deborah C. |
| 4. Anellia M. Johnson, Asst. Secretary | 17. Merrill, Michelle C. |
| 5. Brown, Jamica B. | 18. Nabors, Eric L. |
| 6. Craig, Daren P. | 19. Plant, Mekia T. |
| 7. Cuddy, Kimberly L. | 20. Rothenberg, Clive B. |
| 8. Fleming, Celestine S. | 21. Scott, Frederick L. |
| 9. Gonsamer, Stephanie N. | 22. Trotter, Kelly J. |
| 10. Graubart, Cynthia S. | 23. Whitney, Paul J. |
| 11. Hall, Annie M. | 24. Christopher Henry A.J. |
| 12. Hand, William L. | 25. Donald Archibald A.J. |
| 13. Hutchinson, Sandra H. | 26. Margaret Simmons A.J. |

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**COUNT 1: VIOLATION OF GEORGIA RACKETEER INFLUENCED AND CORRUPT
ORGANIZATIONS ACT, O.C.G.A § 16-14-4 (c)**

in the name and on behalf of the citizens of the State of Georgia, do charge and accuse

**BEVERLY HALL
MILLICENT FEW
SHARON DAVIS-WILLIAMS
TAMARA COTMAN
MICHAEL PITTS
CHRISTOPHER WALLER
GREGORY REID
SANDRA WARD
STARLETTE MITCHELL
KIMBERLY ODEN
ARMSTEAD SALTERS
SHERIDAN ROGERS
DANA EVANS
ANGELA WILLIAMSON
DERRICK BROADWATER
SHAYLA SMITH
DESSA CURB
LERA MIDDLEBROOKS**

**PAMELA CLEVELAND
SHANI ROBINSON
DIANE WEBB BUCKNER
GLORIA IVEY
LISA TERRY
INGRID ABELLA-SLY
WENDY AHMED
LUCIOUS BROWN
CAROL DENNIS
TAMEKA GOODSON
TABEEKA JORDAN
CLARIETTA DAVIS
DONALD BULLOCK
THERESIA COPELAND
SHEILA EVANS
WILLIE DAVENPORT
FRANCIS MACK**

with the offense of **VIOLATION OF RACKETEER INFLUENCED AND CORRUPT ORGANIZATIONS ("GEORGIA RICO ACT")**, O.C.G.A. § 16-14-4 (c), for the said accused together with unindicted coconspirators, in the State of Georgia and County of Fulton, on or between the **31st day of May, 2005** and the **1st day of December, 2012**, the exact date(s) being unknown to the Grand Jurors at this time, unlawfully conspired and endeavored to acquire and maintain, directly and indirectly, an interest in and control of U.S. Currency, the property of the Atlanta Public School System ("APS") and the Georgia Department of Education ("GaDOE") as further specified below, through a pattern of racketeering activity, in violation of **O.C.G.A. § 16-14-4 (a)**, and while employed by and associated with APS, unlawfully conspired and endeavored to conduct and participate in, directly and indirectly, APS through a pattern of racketeering activity, in violation of **O.C.G.A. § 16-14-4 (b)**, as described below and incorporated by reference as if fully set forth herein; contrary to the laws of said State, the good order, peace and dignity thereof;

DEFINITIONS

APS: Atlanta Public School System, formally the "Atlanta Independent School System." A school system in the City of Atlanta, Fulton County, Georgia.

AYP: Adequate Yearly Progress. Part of the No Child Left Behind Act of 2001. AYP is a measure of year-to-year student achievement on statewide assessments. Schools, school districts, and states must demonstrate a certain level of performance on reading, English/language arts, and mathematics assessments. Schools that "meet" AYP for two consecutive years are designated as "Distinguished Schools," a status that entitles the school to a monetary award. Schools that "do not meet" AYP for two consecutive years in the same subject area are designated as "Needs Improvement" ("NI") schools. Each year that a school fails to make AYP, its NI status increases, requiring progressively more involved state participation in the school's management, as follows:

NI-1: School must implement a School Improvement Plan and must offer Public School Choice.

NI-2: Same as NI-1 and funding for Supplemental Education Services (e.g. after school tutorial programs) must be set aside in the school's Title I allocation.

NI-3: Same as NI-2. A School Corrective Plan must also be put in place to include at least one of the following: replace all or most of the school's staff, implement a new curriculum, decrease management authority at the school level, hire an outside expert to advise the school, extend the school year/school day, or restructure the school's internal organizational arrangement.

NI-4: Same as NI-3. A School Restructuring Plan must be created to include at least one of the following: reopen the school as a public charter school, replace all or most of the school's staff, enter into a contract with a private management company to operate the school, or any other major restructuring of the school's governance arrangement.

NI-5: Same as NI-4. The school must implement the Restructuring Plan developed and approved in the previous year.

NI-6: Same as NI-5. The GaDOE will conduct a School Performance Review and Needs Assessment. Based on the assessment, the GaDOE makes a recommendation to the State Board of Education and an Improvement Contract is created.

NI-7: Same as NI-6. The school must implement the Improvement Contract and the school becomes a Contract-Monitored School Year 1.

NI-8: Same as NI-7. The school becomes a Contract-Monitored School Year 2. The GaDOE performs another System Performance Review and Needs Assessment and develops a Management Contract for the school.

NI-9: Same as NI-8. The school must implement the Management Contract and becomes a Contract-Managed School Year I.

NI-10: Same as NI-9. The school also becomes a Contract-Managed School Year 2 and must update the Management Contract.

BRC: Blue Ribbon Commission. The BRC was created by Beverly Hall and the Atlanta Education Fund, and was authorized by a resolution of the Atlanta Board of Education. The BRC was charged with conducting an independent investigation of Atlanta Public Schools as a result of the state's erasure analysis of APS' spring 2009 CRCT.

CRCT: Criterion-Referenced Competency Test. A standardized test used in Georgia as the AYP assessment tool for elementary and middle schools. The CRCT evaluates grades 1-8 in reading, language arts, and mathematics. Grades 3-8 are also tested in science and social studies.

GaDOE: Georgia Department of Education. The agency that governs public education in the state of Georgia. The GaDOE manages funding and testing for local educational agencies accountable for student achievement. The Department is managed by the State Superintendent of Schools.

GOSA: Governor's Office of Student Achievement. A State agency which provides accountability for Georgia's schools, pre-K through postsecondary levels. The intent is to improve student achievement and school completion in Georgia.

IEP: Individualized Education Program. A plan that is developed by a team of people including teachers, other qualified personnel, parents/guardians, and the student, if appropriate. The purpose of the IEP is to ensure that a child with certain disabilities or impairments attending a public elementary or secondary education institution receives appropriate, specialized instruction and related accommodations.

- NCLB:** No Child Left Behind Act of 2001. NCLB is a United States Act of Congress that reauthorized the Elementary and Secondary Education act, which included Title I, the government's aid program for disadvantaged students. NCLB requires states to develop and administer basic skills assessments to all students at select grade levels in order to receive federal school funding. Georgia's statewide assessment is the CRCT.
- OIR:** Office of Internal Resolution/Employee Relations within APS. This office processes and investigates complaints and reports of employee wrongdoing and related employment matters.
- Paraprofessional:** Also called "parapro." Paraprofessional educators generally assist teachers in the classroom, supervise students outside of the classroom, or provide administrative support for teaching under the teacher's supervision.
- PDP:** Professional Development Plan. A plan developed and used to correct perceived deficiencies in teachers' and administrators' performance. Its purpose is to encourage and support professional improvement in specified areas.
- PEC:** Program for Exceptional Children. Program offering specialized, educational testing, evaluation and other services to eligible children with certain disabilities or impairments. Each eligible student must have an IEP.
- SRT:** School Reform Team. APS was organized into four (4) geographically aligned areas comprised of elementary and middle schools, each headed by an executive director. The structure was intended to provide greater accountability and faster services to schools and parents.
- Targets:** An accountability program implemented under Beverly Hall's administration, consisting of specific performance goals set for each school at the beginning of the school year. The targets were based on quantifiable measures, primarily CRCT performance, and also included factors such as attendance, and enrollment in rigorous academic courses.
- Test Coordinator:** An individual, usually a teacher assigned to a school, with responsibility for overseeing proper test administration during the testing period.

THE ENTERPRISE

The Atlanta Independent School System (hereinafter "APS") was created in 1870 and is an independent school system. *Lane v. City of Atlanta*, 267 Ga. 843, 483 S.E.2d 575 (1997).

APS is a governmental entity and constitutes an "enterprise" as that term is defined in O.C.G.A. § 16-14-3(6).

THE NATURE OF THE CONSPIRACY
AND THE MEANS BY WHICH IT WAS ACCOMPLISHED

While Superintendent of APS, Beverly Hall set annual performance objectives for APS and the individual schools within it, commonly referred to as "targets." If a school achieved 70% or more of its targets, all employees of the school received a bonus. Additionally, if certain system-wide targets were achieved, Beverly Hall herself received a substantial bonus. Targets for elementary and middle schools were largely based on students' performance on the Criterion Referenced Competency Test ("CRCT"), a standardized test given annually to elementary and middle school students in Georgia. Additionally, student attendance was a contributing factor to achieving targets and obtaining bonuses.

Beverly Hall's targets often set more rigorous goals for schools than Adequate Yearly Progress ("AYP"), a measure of year-to-year student achievement on statewide assessments created under the No Child Left Behind Act of 2001 ("NCLB"). Under Beverly Hall's target system, schools had to perform at a higher standard on the CRCT than otherwise required by the State in order to receive a bonus. AYP required schools to have a certain percentage of students merely pass the CRCT.

The Georgia Department of Education ("GaDOE") requires that the CRCT be administered under tightly-controlled conditions to prevent tampering and other irregularities that could affect test results. Any deviations from these procedures are prohibited. Beverly Hall was required, by statute, to abide by and enforce the regulations of the GaDOE regarding test administration and to certify in writing that those regulations had been followed.

APS principals and teachers were frequently told by Beverly Hall and her subordinates that excuses for not meeting targets would not be tolerated. When principals and teachers could not reach their targets, their performance was criticized, their jobs were threatened and some

were terminated. Over time, the unreasonable pressure to meet annual APS targets led some employees to cheat on the CRCT. The refusal of Beverly Hall and her top administrators to accept anything other than satisfying targets created an environment where achieving the desired end result was more important than the students' education.

To satisfy annual targets and AYP, test answer sheets were altered, fabricated, and falsely certified. Test scores that were inflated as a result of cheating were purported to be the actual achievement of targets through legitimately obtained improvements in students' performance when, in fact, the conspirators knew those results had been obtained through cheating and did not reflect students' actual academic performance.

As part of the conspiracy, employees of APS who failed to satisfy targets were terminated or threatened with termination, while others who achieved targets through cheating were publicly praised and financially rewarded. For example, teachers who reported other teachers who cheated were terminated, while teachers who were caught cheating were only suspended. The message from Beverly Hall was clear: there were to be no exceptions and no excuses for failure to meet targets.

Beverly Hall placed unreasonable emphasis on achieving targets; protected and rewarded those who achieved targets through cheating; terminated principals who failed to achieve targets; and ignored suspicious CRCT score gains at schools within APS. As a result, cheating became more and more prevalent within APS, until by the time the 2009 CRCT was administered, cheating was taking place in a majority of APS's 83 elementary and middle schools. This was substantiated by GOSA's erasure analysis, which identified 43 APS elementary and middle schools with at least one out of four classrooms within those schools having a statistically improbable number of erasures changing wrong answers to right answers. GOSA's erasure

analysis identified an additional 9 APS elementary and middle schools as having at least one out of five classrooms with a statistically improbable number of erasures changing wrong answers to right answers. Confessions by dozens of APS employees subsequently confirmed what GOSA's statistical analysis indicated; widespread cheating occurred on the 2009 CRCT.

It was further a part of the conspiracy and endeavor that targets achieved through cheating were used to obtain financial and other rewards for many of the conspirators.

It was further part of the conspiracy and endeavor that targets achieved through cheating were used by Beverly Hall to obtain substantial performance bonuses.

It was further part of the conspiracy and endeavor that Beverly Hall and other conspirators would interfere with, suppress and obstruct investigations into cheating using various methods. Conspirators would refuse to investigate reports of cheating; suppress and deny the existence of reports of cheating; fail to act upon APS investigators' conclusions that cheating was occurring; suppress and deny the APS investigators' conclusions that cheating was in fact occurring; fail and refuse to provide complaints of cheating to the Governor's Special Investigators, the Georgia Bureau of Investigation ("GBI") and investigators from the Fulton County District Attorney's Office; and intimidate witnesses with the intent to hinder, delay, or prevent the communication of criminal offenses to law enforcement officers. When questioned by the Governor's Special Investigators and law enforcement officers, many of the conspirators made false statements – some under oath – denying their knowledge of and participation in the cheating.

It was further part of the conspiracy and endeavor that each Defendant agreed that a conspirator would commit, attempt to commit, or solicit, coerce, or intimidate another person to commit at least two acts of racketeering activity.

ACTS OF RACKETEERING ACTIVITY

The following acts constitute a pattern of racketeering activity in that they were committed in furtherance of one or more incidents, schemes, or transactions that had the same or similar intents, results, accomplices, victims or methods of commission or otherwise were interrelated by distinguishing characteristics.

ACTS OF RACKETEERING BY SENIOR ADMINISTRATORS OF APS

BEVERLY HALL served as the Superintendent of APS, in which capacity she was employed by and associated with APS. In her capacity as the Superintendent, **BEVERLY HALL** conspired and endeavored to violate the Georgia RICO Act through a pattern of racketeering activity, as described herein below in this Count.

MILLCENT FEW served as the Chief Human Resources Officer of APS, in which capacity she was employed by and associated with APS. In her capacity as the Chief Human Resources Officer, **MILLCENT FEW** conspired and endeavored to violate the Georgia RICO Act through a pattern of racketeering activity, as described herein below in this Count.

SHARON DAVIS-WILLIAMS served as the Executive Director of SRT-1 for APS, in which capacity she was employed by and associated with APS. In her capacity as the SRT-1 Executive Director, **SHARON DAVIS-WILLIAMS** conspired and endeavored to violate the Georgia RICO Act through a pattern of racketeering activity, as described herein below in this Count.

MICHAEL PITTS served as the Executive Director of SRT-2 for APS, in which capacity he was employed by and associated with APS. In his capacity as the SRT-2 Executive Director, **MICHAEL PITTS** conspired and endeavored to violate the Georgia RICO Act through a pattern of racketeering activity, as described herein below in this Count.

TAMARA COTMAN served as the Executive Director of SRT-4 for APS, in which capacity she was employed by and associated with APS. In her capacity as the SRT-4 Executive Director, **TAMARA COTMAN** conspired and endeavored to violate the Georgia RICO Act through a pattern of racketeering activity, as described herein below in this Count.

A. FALSE STATEMENTS AND WRITINGS, O.C.G.A. § 16-10-20

- 1) **BEVERLY HALL**, in the County of Fulton and State of Georgia, on or about the **2nd day of October, 2009**, did knowingly and willfully make and use a false document, by completing and submitting a Superintendent's Test Certification to the GaDOE, knowing the same to contain false statements, to wit: that "[APS] adhered to all written regulations and procedures relating to testing and test administration, including the distribution and collection of test materials, test security, use of test results and department testing dates and the reporting of irregularities established in the Student Assessment Handbook, System and School Test Coordinator Manuals";
- 2) **SHARON DAVIS-WILLIAMS**, in the County of Fulton and State of Georgia, on or between the **19th day of April, 2009** and the **8th day of May, 2009**, the exact dates being unknown to the Grand Jurors at this time, did knowingly and willfully conceal and cover up, by a trick, scheme, or device, a material fact, to wit: that during the 2009 CRCT at Perkerson Elementary School, test monitor Dr. Jackie Boyce was told by students that their teacher gave them correct answers, in violation of the testing rules and regulations set forth by the GaDOE;
- 3) **SHARON DAVIS-WILLIAMS**, in the County of Fulton and State of Georgia, on or between the **19th day of April, 2009** and the **8th day of May, 2009**, the exact dates being unknown to the Grand Jurors at this time, did knowingly and willfully make and use false documents and writings, to wit: a standardized test feedback form, by causing Dr. Jackie Boyce to omit his written observation that during the 2009 CRCT at Herndon Elementary School said monitor witnessed a teacher pointing out correct answers to students causing said students to change their answers from wrong to right, in violation of the testing rules and regulations set forth by the GaDOE;

in a matter within the jurisdiction of APS, a political subdivision of the State of Georgia, the GaDOE, and the Governor's Office of Student Achievement ("GOSA"), departments or agencies of state government, which conduct constitutes racketeering activity pursuant to O.C.G.A. § 16-14-3(9)(A)(xv).

B. THEFT BY TAKING, O.C.G.A. § 16-8-2

- 4) **BEVERLY HALL**, in the County of Fulton and State of Georgia, on or between the 9th day of October, 2006 and the 31st day of October, 2006, the exact dates being unknown to the Grand Jurors at this time, while an employee of a government institution in breach of her duties as such employee, did unlawfully take U.S. currency, the property of APS, with the intention of depriving said owner of said property, by causing APS to issue her a monetary bonus based on 2006 CRCT results for schools in APS which she knew were false;
- 5) **BEVERLY HALL**, in the County of Fulton and State of Georgia, on or between the 10th day of September, 2007 and the 31st day of October, 2007, the exact dates being unknown to the Grand Jurors at this time, while an employee of a government institution in breach of her duties as such employee, did unlawfully take U.S. currency, the property of APS, with the intention of depriving said owner of said property, by causing APS to issue her a monetary bonus based on 2007 CRCT results for schools in APS which she knew were false;
- 6) **BEVERLY HALL**, in the County of Fulton and State of Georgia, on or between the 1st day of September, 2008 and the 31st day of October, 2008, the exact dates being unknown to the Grand Jurors at this time, while an employee of a government institution in breach of her duties as such employee, did unlawfully take U.S. currency, the property of APS, with the intention of depriving said owner of said property, by causing APS to issue her a monetary bonus based on 2008 CRCT results for schools in APS which she knew were false;
- 7) **BEVERLY HALL**, in the County of Fulton and State of Georgia, on or between the 14th day of September, 2009 and the 31st day of October, 2009, the exact dates being unknown to the Grand Jurors at this time, while an employee of a government institution in breach of her duties as such employee, did unlawfully take U.S. currency, the property of APS, with the intention of depriving said owner of said property, by causing APS to issue her a monetary bonus based on 2009 CRCT results for schools in APS which she knew were false;
- 8) **BEVERLY HALL**, in the County of Fulton and State of Georgia, on or between the 4th day of November, 2009 and the 30th day of September 2010, the exact dates being unknown to the Grand Jurors at this time, while an officer or employee of a government institution in breach of her duties as such officer or employee, did unlawfully take U.S. currency, the property of the GaDOE, with the intention of depriving said owner of said property, by causing the Distinguished District monetary award from the GaDOE to be issued to Parks Middle School by reporting 2009 CRCT results that she knew were false;

9) **BEVERLY HALL**, in the County of Fulton and State of Georgia, on or between the 4th day of November, 2009 and the 30th day of September 2010, the exact dates being unknown to the Grand Jurors at this time, while an officer or employee of a government institution in breach of her duties as such officer or employee, did unlawfully take U.S. currency, the property of the GaDOE, with the intention of depriving said owner of said property, by caused the Distinguished District monetary award from the GaDOE to be issued to Benteen Elementary School by reporting 2009 CRCT results that she knew were false;

10) **BEVERLY HALL**, in the County of Fulton and State of Georgia, on or between the 4th day of November, 2009 and the 30th day of September 2010, the exact dates being unknown to the Grand Jurors at this time, while an officer or employee of a government institution in breach of her duties as such officer or employee, did unlawfully take U.S. currency, the property of the GaDOE, with the intention of depriving said owner of said property, by causing the Distinguished District monetary award from the GaDOE to be issued to D.H. Stanton Elementary School by reporting 2009 CRCT results that she knew were false;

which conduct constitutes racketeering activity pursuant to O.C.G.A. § 16-14-3(9)(A)(ix).

C. INFLUENCING WITNESSES, O.C.G.A. § 16-10-93

11) **TAMARA COTMAN**, in the County of Fulton and State of Georgia, on or about the 17th day of November, 2010, did knowingly intimidate Principal Jimmie Hawkins, and other APS employees, with the intent to hinder or delay the communication of information related to the commission of a criminal offense to GBI and other law enforcement officers investigating cheating in APS;

12) **MICHAEL PITTS**, in the County of Fulton and State of Georgia, on or between the 1st day of August, 2010, and the 31st day of August, 2010, did knowingly intimidate Dorothea Wilson, and other staff at Parks Middle School, with the intent to hinder or delay the communication of information related to the commission of a criminal offense to GBI and other law enforcement officers investigating cheating in APS;

D. FALSE SWEARING, O.C.G.A. § 16-10-71

13) **BEVERLY HALL**, in the County of Fulton and State of Georgia, on or about the 18th day of May, 2011, having been administered a lawful oath or affirmation, did knowingly and willfully make false statements to the Governor's Special Investigators, to wit:

- a. That she never received complaints about Parks Middle School or **CHRISTOPHER WALLER** after he became principal;
- b. That she never met with Reginal Dukes in connection with his investigation into complaints about **CHRISTOPHER WALLER** at Parks Middle School;

14) **MILLICENT FEW**, in the County of Fulton and State of Georgia, on or about the 1st day of June 2011, having been administered a lawful oath or affirmation, did knowingly and willfully make false statements to the Governor's Special Investigators, to wit:

- a. That she never ordered the destruction of early drafts of the Deerwood investigation completed by outside investigator Penn Payne;
- b. That she did not meet with Reginal Dukes in connection with his investigation into complaints about **CHRISTOPHER WALLER** at Parks Middle School;

15) **SHARON DAVIS-WILLIAMS**, in the County of Fulton and State of Georgia, on or about the 3rd day of May, 2011, having been administered a lawful oath or affirmation, did knowingly and willfully make false statements to the Governor's Special Investigators, to wit:

- a. That she did not receive a testing irregularity report from Jackie Boyce;
- b. That she has not asked anybody to change information or misrepresent information regarding the 2009 CRCT; and
- c. That she reported the allegation that a teacher gave students the answers on the CRCT to the Research, Planning, and Accountability ("RPA") office;

which conduct constitutes racketeering activity pursuant to O.C.G.A. § 16-14-3(9)(A)(xv);

ACTS OF RACKETEERING CONCERNING PARKS MIDDLE SCHOOL

CHRISTOPHER WALLER served as the Principal of Parks Middle School, in which capacity he was employed by and associated with APS. In his capacity as Principal, **CHRISTOPHER WALLER** conspired and endeavored to violate the Georgia RICO Act through a pattern of racketeering activity, as described herein below in this Count.

GREGORY REID served as the Assistant Principal of Parks Middle School, in which capacity he was employed by and associated with APS. In his capacity as Assistant Principal, **GREGORY REID** conspired and endeavored to violate the Georgia RICO Act through a pattern of racketeering activity, as described herein below in this Count.

SANDRA WARD served as the Instructional Facilitator and, in 2010, as the Testing Coordinator, at Parks Middle School, in which capacities she was employed by and associated with APS. In her capacity as Instructional Facilitator and Testing Coordinator, **SANDRA WARD** conspired and endeavored to violate the Georgia RICO Act through a pattern of racketeering activity, as described herein below in this Count.

STARLETTE MITCHELL served as a teacher at Parks Middle School, in which capacity she was employed by and associated with APS. In her capacity as a teacher, **STARLETTE MITCHELL** conspired and endeavored to violate the Georgia RICO Act through a pattern of racketeering activity, as described herein below in this Count.

KIMBERLY ODEN served as a teacher at Parks Middle School, in which capacity she was employed by and associated with APS. In her capacity as a teacher, **KIMBERLY ODEN** conspired and endeavored to violate the Georgia RICO Act through a pattern of racketeering activity, as described herein below in this Count.

E. 2006: FALSE STATEMENTS AND WRITINGS, O.C.G.A. § 16-10-20

- 16) **CHRISTOPHER WALLER**, in the County of Fulton and State of Georgia, on or between the 1st day of August, 2005 and the 8th day of February, 2006, the exact date(s) being unknown to the Grand Jurors at this time, did solicit Stacey Johnson to knowingly and willfully make and use false documents and writings, by asking her to participate in falsifying students' answer sheets on the 2006 CRCT for Parks Middle School;
- 17) **CHRISTOPHER WALLER**, in the County of Fulton and State of Georgia, on or between the 29th day of March, 2006 and the 26th day of April, 2006, the exact date(s) being unknown to the Grand Jurors at this time, did solicit Damany Lewis to knowingly and willfully make and use false documents and writings, by asking him to participate in falsifying students' answer sheets on the 2006 CRCT for Parks Middle School;
- 18) **CHRISTOPHER WALLER**, in the County of Fulton and State of Georgia, on or between the 29th day of March, 2006 and the 26th day of April, 2006, the exact date(s) being unknown to the Grand Jurors at this time, did solicit Crystal Draper to knowingly and willfully make and use false documents and writings, by asking her to participate in falsifying students' answer sheets on the 2006 CRCT for Parks Middle School;

- 19) **CHRISTOPHER WALLER, GREGORY REID, and SANDRA WARD**, in the County of Fulton and State of Georgia, during the CRCT testing period on or between the **17th day of April, 2006** and the **26th day of April, 2006**, the exact date(s) being unknown to the Grand Jurors at this time, did knowingly and willfully make and use false documents and writings, knowing the same to contain false entries, by falsifying students' answer sheets on the 2006 CRCT answer sheets for students at Parks Middle School;
- 20) **BEVERLY HALL**, in the County of Fulton and State of Georgia, on or between the **10th day of May, 2006** and the **20th day of December, 2006**, the exact dates being unknown to the Grand Jurors at this time, in violation of her duty as APS superintendent, pursuant to O.C.G.A. § 20-2-109 and the testing rules and regulations set forth by the Georgia Department of Education ("GaDOE"), did knowingly and willfully conceal and cover up, by a trick, scheme, or device, material facts, to wit: **BEVERLY HALL** received a complaint that **CHRISTOPHER WALLER** was pressuring teachers to cheat on the Spring 2006 CRCT at Parks Middle School and after Reginal Dukes' report concluded that cheating had occurred on the Georgia Eighth Grade Writing Assessment at Parks Middle School and the results of the Spring 2006 CRCT at Parks Middle School had likely been compromised, intentionally failed to report this information to the GaDOE and the Georgia Professional Standards Commission ("PSC");
- 21) **MICHAEL PITTS**, in the County of Fulton and State of Georgia, on or between the **10th day of May, 2006** and the **20th day of December, 2006**, the exact dates being unknown to the Grand Jurors at this time, did knowingly and willfully conceal and cover up, by a trick, scheme, or device, material facts, to wit: **MICHAEL PITTS** received complaints that **CHRISTOPHER WALLER** was pressuring teachers to cheat on the Spring 2006 CRCT at Parks Middle School and after Reginal Dukes' report concluded that cheating had occurred on the Georgia Eighth Grade Writing Assessment at Parks Middle School and the results of the Spring 2006 CRCT at Parks Middle School had likely been compromised, intentionally failed to report this information to the PSC;

all in a matter within the jurisdiction of APS, a political subdivision of the State of Georgia; the GaDOE, and the Governor's Office of Student Achievement ("GOSA"), departments or agencies of state government, which conduct constitutes racketeering activity pursuant to O.C.G.A. § 16-14-3(9)(A)(xv).

F. 2006: THEFT BY TAKING, O.C.G.A. § 16-8-2

22) **BEVERLY HALL**, in the County of Fulton and State of Georgia, on or between the 17th day of April, 2006 and the 20th day of December, 2006, the exact dates being unknown to the Grand Jurors at this time, while an officer or employee of a government institution in breach of her duties as such officer or employee, did unlawfully take U.S. currency, the property of APS, with the intention of depriving said owner of said property, by causing APS to issue a monetary bonus to APS employees at Parks Middle School based on falsified test results on the 2006 CRCT for Parks Middle School;

23) **CHRISTOPHER WALLER, GREGORY REID, and SANDRA WARD**, in the County of Fulton and State of Georgia, on or about the 20th day of December, 2006 and while employees of a government institution in breach of their duties as such employees, did unlawfully take U.S. currency, the property of APS, with the intention of depriving said owner of said property, by causing APS to issue each of the accused a monetary bonus based on falsified test results on the 2006 CRCT for Parks Middle School;

which conduct constitutes racketeering activity pursuant to O.C.G.A. § 16-14-3(9)(A)(ix).

G. 2007: FALSE STATEMENTS AND WRITINGS, O.C.G.A. § 16-10-20

24) **CHRISTOPHER WALLER**, in the County of Fulton and State of Georgia, on or between the 28th day of March, 2007 and the 26th day of April, 2007, the exact date(s) being unknown to the Grand Jurors at this time, did solicit Damany Lewis to knowingly and willfully make and use false documents and writings, by asking him to participate in falsifying students' answer sheets on the 2007 CRCT for Parks Middle School;

25) **CHRISTOPHER WALLER**, in the County of Fulton and State of Georgia, on or between the 28th day of March, 2007 and the 26th day of April, 2007, the exact date(s) being unknown to the Grand Jurors at this time, did solicit Crystal Draper to knowingly and willfully make and use false documents and writings, by asking her to participate in falsifying students' answer sheets on the 2007 CRCT for Parks Middle School;

26) **CHRISTOPHER WALLER, GREGORY REID, SANDRA WARD, and STARLETTE MITCHELL**, in the County of Fulton and State of Georgia, during the CRCT testing period on or between the 16th day of April, 2007 and the 26th day of April, 2007, the exact date(s) being unknown to the Grand Jurors at this time, did knowingly and willfully make and use false documents and writings, knowing the same to contain false entries, by falsifying students' answer sheets on the 2007 CRCT answer sheets for students at Parks Middle School;

all in a matter within the jurisdiction of APS, a political subdivision of the State of Georgia; the GaDOE and GOSA, departments or agencies of state government, which conduct constitutes racketeering activity pursuant to O.C.G.A. § 16-14-3(9)(A)(xv).

H. 2007: THEFT BY TAKING, O.C.G.A. § 16-8-2

27) CHRISTOPHER WALLER, GREGORY REID, SANDRA WARD, and STARLETTE MITCHELL, in the County of Fulton and State of Georgia, on or about the **20th day of December, 2007** and while employees of a government institution in breach of their duties as such employees, did unlawfully take U.S. currency, the property of APS, with the intention of depriving said owner of said property, by causing APS to issue each of the accused a monetary bonus based on falsified test results on the 2007 CRCT for Parks Middle School;

which conduct constitutes racketeering activity pursuant to O.C.G.A. § 16-14-3(9)(A)(ix).

I. 2008: FALSE STATEMENTS AND WRITINGS, O.C.G.A. § 16-10-20

28) CHRISTOPHER WALLER, in the County of Fulton and State of Georgia, on or between the **31st day of March, 2008** and the **1st day of May, 2008**, the exact date(s) being unknown to the Grand Jurors at this time, did solicit Damany Lewis to knowingly and willfully make and use false documents and writings, by asking him to participate in falsifying students' answer sheets on the 2008 CRCT for Parks Middle School;

29) CHRISTOPHER WALLER and GREGORY REID, in the County of Fulton and State of Georgia, on or between the **31st day of March, 2008** and the **1st day of May, 2008**, the exact date(s) being unknown to the Grand Jurors at this time, did solicit Crystal Draper to knowingly and willfully make and use false documents and writings, by asking her to participate in falsifying students' answer sheets on the 2008 CRCT for Parks Middle School;

30) CHRISTOPHER WALLER, in the County of Fulton and State of Georgia, on or between the **31st day of March, 2008** and the **1st day of May, 2008**, the exact date(s) being unknown to the Grand Jurors at this time, did solicit Dorothea Wilson to knowingly and willfully make and use false documents and writings, by asking her to participate in falsifying students' answer sheets on the 2008 CRCT for Parks Middle School;

31) GREGORY REID, in the County of Fulton and State of Georgia, on or between the **31st day of March, 2008** and the **1st day of May, 2008**, the exact date(s) being unknown to the Grand Jurors at this time, did solicit Latasha Smiley to knowingly and willfully make and use false documents and writings, by asking her to participate in falsifying students' answer sheets on the 2008 CRCT for Parks Middle School;

32) GREGORY REID, in the County of Fulton and State of Georgia, on or between the **31st day of March, 2008** and the **1st day of May, 2008**, the exact date(s) being unknown to the Grand Jurors at this time, did solicit Charles Mitchell to knowingly and willfully make and use false documents and writings, by asking him to participate in falsifying students' answer sheets on the 2008 CRCT for Parks Middle School;

33) **CHRISTOPHER WALLER, GREGORY REID, SANDRA WARD, STARLETTE MITCHELL,** and **KIMBERLY ODEN**, in the County of Fulton and State of Georgia, during the CRCT testing period on or between the **21st day of April, 2008** and the **1st day of May, 2008**, the exact date(s) being unknown to the Grand Jurors at this time, did knowingly and willfully make and use false documents and writings, knowing the same to contain false entries, by falsifying students' answer sheets on the 2008 CRCT answer sheets for students at Parks Middle School;

34) **CHRISTOPHER WALLER**, in the County of Fulton and State of Georgia, did knowingly and willfully make and use a false document and writing, by completing, signing, and submitting a CRCT School Certification Form for Parks Middle School to APS dated the **5th day of May, 2008**, knowing the same to contain false statements, to wit:

- (1) The written plans for testing were followed, including all directives in the *Examiner's Manual*, the *Testing Coordinator's Manual*, and system correspondence;
- (2) There was ethical behavior on the part of [staff] involved in the test administration; any suspected testing irregularity/ circumstance has been reported to the system coordinator;

all in a matter within the jurisdiction of APS, a political subdivision of the State of Georgia; the GaDOE and GOSA, departments or agencies of state government, which conduct constitutes racketeering activity pursuant to O.C.G.A. § 16-14-3(9)(A)(xv).

J. 2008: THEFT BY TAKING, O.C.G.A. § 16-8-2

35) **CHRISTOPHER WALLER, GREGORY REID, SANDRA WARD, STARLETTE MITCHELL,** and **KIMBERLY ODEN**, in the County of Fulton and State of Georgia, on or about the **19th day of December, 2008** and while employees of a government institution in breach of their duties as such employees, did unlawfully take U.S. currency, the property of APS, with the intention of depriving said owner of said property, by causing APS to issue each of the accused a monetary bonus based on falsified test results on the 2008 CRCT for Parks Middle School;

which conduct constitutes racketeering activity pursuant to O.C.G.A. § 16-14-3(9)(A)(ix).

K. 2009: FALSE STATEMENTS AND WRITINGS, O.C.G.A. § 16-10-20

- 36) **CHRISTOPHER WALLER**, in the County of Fulton and State of Georgia, on or between the **27th day of March, 2009** and the **30th day of April, 2009**, the exact date(s) being unknown to the Grand Jurors at this time, did solicit Damany Lewis to knowingly and willfully make and use false documents and writings, by asking him to participate in falsifying students' answer sheets on the 2009 CRCT for Parks Middle School;
- 37) **CHRISTOPHER WALLER**, in the County of Fulton and State of Georgia, on or between the **27th day of March, 2009** and the **30th day of April, 2009**, the exact date(s) being unknown to the Grand Jurors at this time, did solicit Crystal Draper to knowingly and willfully make and use false documents and writings, by asking her to participate in falsifying students' answer sheets on the 2009 CRCT for Parks Middle School;
- 38) **CHRISTOPHER WALLER**, in the County of Fulton and State of Georgia, on or between the **27th day of March, 2009** and the **30th day of April, 2009**, the exact date(s) being unknown to the Grand Jurors at this time, did solicit Dorothea Wilson to knowingly and willfully make and use false documents and writings, by asking her to participate in falsifying students' answer sheets on the 2009 CRCT for Parks Middle School;
- 39) **GREGORY REID**, in the County of Fulton and State of Georgia, on or between the **27th day of March, 2009** and the **30th day of April, 2009**, the exact date(s) being unknown to the Grand Jurors at this time, did solicit Charles Mitchell to knowingly and willfully make and use false documents and writings, by asking him to participate in falsifying students' answer sheets on the 2009 CRCT for Parks Middle School;
- 40) **CHRISTOPHER WALLER**, in the County of Fulton and State of Georgia, on or between the **27th day of March, 2009** and the **30th day of April, 2009**, the exact date(s) being unknown to the Grand Jurors at this time, did solicit Adrienne Powell to knowingly and willfully make and use false documents and writings, by asking her to participate in falsifying students' answer sheets on the 2009 CRCT for Parks Middle School;
- 41) **CHRISTOPHER WALLER, GREGORY REID, SANDRA WARD, STARLETTE MITCHELL**, and **KIMBERLY ODEN**, in the County of Fulton and State of Georgia, during the CRCT testing period on or between the **21st day of April, 2009** and the **30th day of April, 2009**, the exact date(s) being unknown to the Grand Jurors at this time, did knowingly and willfully make and use false documents and writings, knowing the same to contain false entries, by falsifying students' answer sheets on the 2009 CRCT answer sheets for students at Parks Middle School;

42) **CHRISTOPHER WALLER**, in the County of Fulton and State of Georgia, did knowingly and willfully make and use a false document and writing, by completing, signing, and submitting a CRCT School Certification Form for Parks Middle School to APS dated the 30th day of April, 2009, knowing the same to contain false statements, to wit:

- (1) The written plans for testing were followed, including all directives in the *Examiner's Manual*, the *Testing Coordinator's Manual*, and system correspondence;
- (2) There was ethical behavior on the part of [staff] involved in the test administration; any suspected testing irregularity/ circumstance has been reported to the system coordinator;

all in a matter within the jurisdiction of APS, a political subdivision of the State of Georgia; the GaDOE and GOSA, departments or agencies of state government, which conduct constitutes racketeering activity pursuant to O.C.G.A. § 16-14-3(9)(A)(xv).

L. 2010: FALSE STATEMENTS AND WRITINGS, O.C.G.A. § 16-10-20

43) **CHRISTOPHER WALLER, GREGORY REID, and SANDRA WARD**, in the County of Fulton and State of Georgia, on or between the 27th day of April, 2010 and the 6th day of May, 2010, did knowingly and willfully make and use a false document and writing, to wit: a testing irregularity report, knowing the same to contain a false statement, to wit: that Chynel Walker removed a test instruction manual from Megan Eckert's classroom;

44) **CHRISTOPHER WALLER, GREGORY REID, and SANDRA WARD**, in the County of Fulton and State of Georgia, on or between the 27th day of April, 2010 and the 6th day of May, 2010, did intimidate and coerce Megan Eckert to knowingly and willfully make and use a false document and writing, to wit: a testing irregularity report, knowing the same to contain a false statement;

45) **CHRISTOPHER WALLER** and **SANDRA WARD**, in the County of Fulton and State of Georgia, did knowingly and willfully make and use a false document and writing, by completing, signing, and submitting a CRCT School Certification Form for Parks Middle School to APS dated the **28th day of April, 2010**, knowing the same to contain false statements, to wit:

(1) The written plans for testing were followed, including all directives in the *Examiner's Manual*, the *Testing Coordinator's Manual*, and system correspondence;

(2) There was ethical behavior on the part of [staff] involved in the test administration; any suspected testing irregularity/circumstance has been reported to the system coordinator;

46) **SANDRA WARD**, in the County of Fulton and State of Georgia, on or about the **20th day of October, 2010**, did knowingly and willfully make a false statement to a GBI agent, to wit: that she did not participate in, assist with or have knowledge of anyone erasing or changing answers on students' CRCT answer sheets;

47) **STARLETTE MITCHELL** in the County of Fulton and State of Georgia, on or about the **20th day of October, 2010** did knowingly and willfully make a false statement to a GBI agent, to wit: that she did not participate in, assist with or have knowledge of anyone erasing or changing answers on students' CRCT answer sheets;

48) **STARLETTE MITCHELL** in the County of Fulton and State of Georgia, on or about the **15th day of December, 2010** did knowingly and willfully make a false statement to a GBI agent, to wit: that she only participated in changing answers on students' CRCT answer sheets in 2009;

49) **GREGORY REID**, in the County of Fulton and State of Georgia, on or about the **20th day of October, 2010**, did knowingly and willfully make a false statement to a Georgia Bureau of Investigations ("GBI") agent, to wit: that he did not participate in, assist with or have knowledge of anyone erasing or changing answers on students' CRCT answer sheets;

all in a matter within the jurisdiction of APS, a political subdivision of the State of Georgia; the GaDOE and GOSA, departments or agencies of state government, which conduct constitutes racketeering activity pursuant to O.C.G.A. § 16-14-3(9)(A)(xv).

M. 2010: FALSE SWEARING, O.C.G.A. § 16-10-71

50) CHRISTOPHER WALLER, in the County of Fulton and State of Georgia, on or about the 18th day of April, 2011, having been administered a lawful oath or affirmation, did knowingly and willfully make false statements to the Governor's Special Investigators, to wit:

- a. That he was not aware of any improprieties whatsoever with respect to how CRCT testing was conducted at Parks Middle School;
- b. That he was not aware of any adult changing answers on students' CRCT answer sheets;
- c. That he did not have any knowledge of teachers at Parks Middle School keeping tests later than they should have;

51) GREGORY REID, in the County of Fulton and State of Georgia, on or about the 18th day of April, 2011, having been administered a lawful oath or affirmation, did knowingly and willfully make false statements to the Governor's Special Investigators, to wit:

- a. That he was not aware teachers were cheating on the CRCT at Parks Middle School;
- b. That he did not suggest or direct teachers to cheat;
- c. That he did not have any knowledge of teachers at Parks Middle School keeping tests later than they should have;

which conduct constitutes racketeering activity pursuant to O.C.G.A. § 16-14-3(9)(A)(xv).

ACTS OF RACKETEERING CONCERNING GIDEONS ELEMENTARY SCHOOL

ARMSTEAD SALTERS served as Principal of Gideons Elementary School, in which capacity he was employed by and associated with APS. In his capacity as Principal, **ARMSTEAD SALTERS** conspired and endeavored to violate the Georgia RICO Act through a pattern of racketeering activity, as described herein below in this Count.

SHERIDAN ROGERS served as the testing coordinator at Gideons Elementary School, in which capacity she was employed by and associated with APS. In her capacity as the testing coordinator, **SHERIDAN ROGERS** conspired and endeavored to violate the Georgia RICO Act through a pattern of racketeering activity, as described herein below in this Count.

N. 2008: FALSE STATEMENTS AND WRITINGS, O.C.G.A. § 16-10-20

- 52) ARMSTEAD SALTERS and SHERIDAN ROGERS**, in the County of Fulton and State of Georgia, during the CRCT testing period, on or between the **21st day of April, 2008** and the **1st day of May, 2008**, the exact date(s) being unknown to the Grand Jurors at this time, did solicit Bernadine Macon to knowingly and willfully make and use false documents and writings, by asking her to participate in falsifying students' answer sheets on the 2008 CRCT for Gideons Elementary School;
- 53) ARMSTEAD SALTERS and SHERIDAN ROGERS**, in the County of Fulton and State of Georgia, during the CRCT testing period, on or between the **21st day of April, 2008** and the **1st day of May, 2008**, the exact date(s) being unknown to the Grand Jurors at this time, did solicit Daisy Bowser to knowingly and willfully make and use false documents and writings, by asking her to participate in falsifying students' answer sheets on the 2008 CRCT for Gideons Elementary School;
- 54) ARMSTEAD SALTERS and SHERIDAN ROGERS**, in the County of Fulton and State of Georgia, during the CRCT testing period, on or between the **21st day of April, 2008** and the **1st day of May, 2008**, the exact date(s) being unknown to the Grand Jurors at this time, did solicit Veronica Jordan to knowingly and willfully make and use false documents and writings, by asking her to participate in falsifying students' answer sheets on the 2008 CRCT for Gideons Elementary School;
- 55) ARMSTEAD SALTERS and SHERIDAN ROGERS**, in the County of Fulton and State of Georgia, during the CRCT testing period, on or between the **21st day of April, 2008** and the **1st day of May, 2008**, the exact date(s) being unknown to the Grand Jurors at this time, did solicit Oliver Banks, Jr. to knowingly and willfully make and use false documents and writings, by asking him to participate in falsifying students' answer sheets on the 2008 CRCT for Gideons Elementary School;
- 56) SHERIDAN ROGERS**, in the County of Fulton and State of Georgia, during the CRCT testing period, on or between the **21st day of April, 2008** and the **1st day of May, 2008**, the exact date(s) being unknown to the Grand Jurors at this time, did solicit Tremelia Donaldson to knowingly and willfully make and use false documents and writings, by asking her to participate in falsifying students' answer sheets on the 2008 CRCT for Gideons Elementary School;

- 57) **SHERIDAN ROGERS**, in the County of Fulton and State of Georgia, during the CRCT testing period, on or between the **21st day of April, 2008** and the **1st day of May, 2008**, the exact date(s) being unknown to the Grand Jurors at this time, did solicit Denethia Weddington-Ward to knowingly and willfully make and use false documents and writings, by asking her to participate in falsifying students' answer sheets on the 2008 CRCT for Gideons Elementary School;
- 58) **SHERIDAN ROGERS**, in the County of Fulton and State of Georgia, during the CRCT testing period, on or between the **21st day of April, 2008** and the **1st day of May, 2008**, the exact date(s) being unknown to the Grand Jurors at this time, did solicit Cheryl Hunt to knowingly and willfully make and use false documents and writings, by asking her to participate in falsifying students' answer sheets on the 2008 CRCT for Gideons Elementary School;
- 59) **ARMSTEAD SALTERS** and **SHERIDAN ROGERS**, in the County of Fulton and State of Georgia, during the CRCT testing period, on or between the **21st day of April, 2008** and the **1st day of May, 2008**, the exact date(s) being unknown to the Grand Jurors at this time, did knowingly and willfully make and use false documents and writings, knowing the same to contain false entries, by falsifying students' answer sheets on the 2008 CRCT answer sheets for students at Gideons Elementary School;
- 60) **ARMSTEAD SALTERS** and **SHERIDAN ROGERS** in the County of Fulton and State of Georgia, did knowingly and willfully make and use a false document and writing, by completing, signing, and submitting a CRCT School Certification Form for Gideons Elementary School to APS dated the **2nd day of May, 2008**, knowing the same to contain false statements, to wit:

- (1) The written plans for testing were followed, including all directives in the *Examiner's Manual*, the *Testing Coordinator's Manual*, and system correspondence;
- (2) There was ethical behavior on the part of [staff] involved in the test administration; any suspected testing irregularity/circumstance has been reported to the system coordinator;

all in a matter within the jurisdiction of APS, a political subdivision of the State of Georgia; the GaDOE and GOSA, departments or agencies of state government, which conduct constitutes racketeering activity pursuant to O.C.G.A. § 16-14-3(9)(A)(xv).

O. 2008: THEFT BY TAKING, O.C.G.A. § 16-8-2

61) ARMSTEAD SALTERS and SHERIDAN ROGERS, in the County of Fulton and State of Georgia, on or about the **19th day of December, 2008** and while employees of a government institution in breach of their duties as such employees, did unlawfully take U.S. currency, the property of APS, with the intention of depriving said owner of said property, by causing APS to issue each of the accused a monetary bonus based on falsified test results on the 2008 CRCT for Gideons Elementary School;

which conduct constitutes racketeering activity pursuant to O.C.G.A. § 16-14-3(9)(A)(ix).

P. 2009: FALSE STATEMENTS AND WRITINGS, O.C.G.A. § 16-10-20

62) ARMSTEAD SALTERS and SHERIDAN ROGERS, in the County of Fulton and State of Georgia, during the CRCT testing period, on or between the **21st day of April, 2009** and the **30th day of April, 2009**, the exact date(s) being unknown to the Grand Jurors at this time, did solicit Bernadine Macon to knowingly and willfully make and use false documents and writings, by asking her to participate in falsifying students' answer sheets on the 2009 CRCT for Gideons Elementary School;

63) ARMSTEAD SALTERS and SHERIDAN ROGERS, in the County of Fulton and State of Georgia, during the CRCT testing period, on or between the **21st day of April, 2009** and the **30th day of April, 2009**, the exact date(s) being unknown to the Grand Jurors at this time, did solicit Daisy Bowser to knowingly and willfully make and use false documents and writings, by asking her to participate in falsifying students' answer sheets on the 2009 CRCT for Gideons Elementary School;

64) ARMSTEAD SALTERS and SHERIDAN ROGERS, in the County of Fulton and State of Georgia, during the CRCT testing period, on or between **21st day of April, 2009** and the **30th day of April, 2009**, the exact date(s) being unknown to the Grand Jurors at this time, did solicit Veronica Jordan to knowingly and willfully make and use false documents and writings, by asking her to participate in falsifying students' answer sheets on the 2009 CRCT for Gideons Elementary School;

65) ARMSTEAD SALTERS and SHERIDAN ROGERS, in the County of Fulton and State of Georgia, during the CRCT testing period, on or between the **21st day of April, 2009** and the **30th day of April, 2009**, the exact date(s) being unknown to the Grand Jurors at this time, did solicit Oliver Banks, Jr. to knowingly and willfully make and use false documents and writings, by asking him to participate in falsifying students' answer sheets on the 2009 CRCT for Gideons Elementary School;

- 66) **ARMSTEAD SALTERS** and **SHERIDAN ROGERS**, in the County of Fulton and State of Georgia, during the CRCT testing period, on or between the **21st day of April, 2009** and the **30th day of April, 2009**, the exact date(s) being unknown to the Grand Jurors at this time, did solicit Tremelia Donaldson to knowingly and willfully make and use false documents and writings, by asking her to participate in falsifying students' answer sheets on the 2009 CRCT for Gideons Elementary School;
- 67) **ARMSTEAD SALTERS** and **SHERIDAN ROGERS**, in the County of Fulton and State of Georgia, during the CRCT testing period, on or between the **21st day of April, 2009** and the **30th day of April, 2009**, the exact date(s) being unknown to the Grand Jurors at this time, did solicit Denethia Weddington-Ward to knowingly and willfully make and use false documents and writings, by asking her to participate in falsifying students' answer sheets on the 2009 CRCT for Gideons Elementary School;
- 68) **ARMSTEAD SALTERS** and **SHERIDAN ROGERS**, in the County of Fulton and State of Georgia, during the CRCT testing period, on or between the **21st day of April, 2009** and the **30th day of April, 2009**, the exact date(s) being unknown to the Grand Jurors at this time, did solicit Cheryl Hunt to knowingly and willfully make and use false documents and writings, by asking her to participate in falsifying students' answer sheets on the 2009 CRCT for Gideons Elementary School;
- 69) **ARMSTEAD SALTERS** and **SHERIDAN ROGERS**, in the County of Fulton and State of Georgia, during the CRCT testing period, on or between the **21st day of April, 2009** and the **30th day of April, 2009**, the exact date(s) being unknown to the Grand Jurors at this time, did knowingly and willfully make and use false documents and writings, knowing the same to contain false entries, by falsifying students' answer sheets on the 2009 CRCT answer sheets for students at Gideons Elementary School;
- 70) **ARMSTEAD SALTERS** and **SHERIDAN ROGERS** in the County of Fulton and State of Georgia, did knowingly and willfully make and use a false document and writing, by completing, signing, and submitting a CRCT School Certification Form for Gideons Elementary School to APS dated the **4th day of May, 2009**, knowing the same to contain false statements, to wit:

- (1) The written plans for testing were followed, including all directives in the *Examiner's Manual*, the *Testing Coordinator's Manual*, and system correspondence;
 - (2) There was ethical behavior on the part of [staff] involved in the test administration; any suspected testing irregularity/circumstance has been reported to the system coordinator;
- all in a matter within the jurisdiction of APS, a political subdivision of the State of Georgia; the GaDOE and GOSA, departments or agencies of state government, which conduct constitutes racketeering activity pursuant to O.C.G.A. § 16-14-3(9)(A)(xv).

Q. 2010: INFLUENCING WITNESSES, O.C.G.A. § 16-10-93

71) **ARMSTEAD SALTERS**, in the County of Fulton and State of Georgia, on or between the 30th day of June, 2010 and the 17th day of November, 2010, did knowingly intimidate Oliver Banks, Jr., and other Gideons Elementary School employees, with the intent to hinder or delay the communication of information related to the commission of a criminal offense to GBI and other law enforcement officers investigating cheating in APS;

which conduct constitutes racketeering activity pursuant to O.C.G.A. § 16-14-3(9)(A)(xiv).

R. 2010: FALSE STATEMENTS AND WRITINGS, O.C.G.A. § 16-10-20

72) **SHERIDAN ROGERS** in the County of Fulton and State of Georgia, on or about the 21st day of October, 2010, did knowingly and willfully make false statements to a GBI agent, to wit:

- a. That she did not return CRCT booklets to teachers so they could change answers;
- b. That she did not instruct teachers to change answers on CRCT answer sheets; and
- c. That she was not present while other teachers changed students' answers on the CRCT answer sheets;

all in a matter within the jurisdiction of APS, a political subdivision of the State of Georgia; the GaDOE and GOSA, departments or agencies of state government, which conduct constitutes racketeering activity pursuant to O.C.G.A. § 16-14-3(9)(A)(xv).

ACTS OF RACKETEERING CONCERNING DOBBS ELEMENTARY SCHOOL

DANA EVANS served as Principal of Dobbs Elementary School, in which capacity she was employed by and associated with APS. In her capacity as Principal, **DANA EVANS** conspired and endeavored to violate the Georgia RICO Act through a pattern of racketeering activity, as described herein below in this Count.

ANGELA WILLIAMSON served as a teacher at Dobbs Elementary School, in which capacity she was employed by and associated with APS. In her capacity as a teacher, **ANGELA WILLIAMSON** conspired and endeavored to violate the Georgia RICO Act through a pattern of racketeering activity, as described herein below in this Count.

DERRICK BROADWATER served as a teacher at Dobbs Elementary School, in which capacity he was employed by and associated with APS. In his capacity as a teacher, **DERRICK BROADWATER** conspired and endeavored to violate the Georgia RICO Act through a pattern of racketeering activity, as described herein below in this Count.

SHAYLA SMITH served as a teacher at Dobbs Elementary School, in which capacity she was employed by and associated with APS. In her capacity as a teacher, **SHAYLA SMITH** conspired and endeavored to violate the Georgia RICO Act through a pattern of racketeering activity, as described herein below in this Count.

DESSA CURB served as a teacher at Dobbs Elementary School, in which capacity she was employed by and associated with APS. In her capacity as a teacher, **DESSA CURB** conspired and endeavored to violate the Georgia RICO Act through a pattern of racketeering activity, as described herein below in this Count.

S. 2008: FALSE STATEMENTS AND WRITINGS, O.C.G.A. § 16-10-20

73) DANA EVANS, ANGELA WILLIAMSON, DERRICK BROADWATER and SHAYLA SMITH, in the County of Fulton and State of Georgia, during the CRCT testing period, on or between the **21st day of April, 2008** and the **1st day of May, 2008**, the exact date(s) being unknown to the Grand Jurors at this time, did knowingly and willfully make and use false documents and writings, knowing the same to contain false entries, by falsifying students' answer sheets on the 2008 CRCT, thereby causing them to falsify their 2008 CRCT answers sheets at Dobbs Elementary School;

74) **DESSA CURB**, in the County of Fulton and State of Georgia, during the CRCT testing period, on or between the **21st day of April, 2008** and the **1st day of May, 2008**, the exact date(s) being unknown to the Grand Jurors at this time, did knowingly and willfully make and use false documents and writings, knowing the same to contain false entries, by falsifying students' answer sheets on the 2009 CRCT answer sheets for students at Dobbs Elementary School;

75) **DANA EVANS**, in the County of Fulton and State of Georgia, did knowingly and willfully make and use a false document and writing, by completing, signing, and submitting a CRCT School Certification Form for Dobbs Elementary School to APS dated the **2nd day of May, 2008**, knowing the same to contain false statements, to wit:

- (1) The written plans for testing were followed, including all directives in the *Examiner's Manual*, the *Testing Coordinator's Manual*, and system correspondence;
- (2) There was ethical behavior on the part of [staff] involved in the test administration; any suspected testing irregularity/circumstance has been reported to the system coordinator;

all in a matter within the jurisdiction of APS, a political subdivision of the State of Georgia; the GaDOE and GOSA, departments or agencies of state government, which conduct constitutes racketeering activity pursuant to O.C.G.A. § 16-14-3(9)(A)(xv).

T. 2008: THEFT BY TAKING, O.C.G.A. § 16-8-2

76) **DANA EVANS, ANGELA WILLIAMSON, DERRICK BROADWATER, SHAYLA SMITH** and **DESSA CURB**, in the County of Fulton and State of Georgia, on or about the **19th day of December, 2008**, and while employees of a government institution in breach of their duties as such government employees, did unlawfully take U.S. currency, the property of APS, with the intention of depriving said owner of said property, by causing APS to issue each of the accused a bonus check based on falsified test results on the 2008 CRCT for Dobbs Elementary School;

which conduct constitutes racketeering activity pursuant to O.C.G.A. § 16-14-3(9)(A)(ix).

U. 2009: FALSE STATEMENTS AND WRITINGS, O.C.G.A. § 16-10-20

77) **DANA EVANS, ANGELA WILLIAMSON, DERRICK BROADWATER** and **SHAYLA SMITH**, in the County of Fulton and State of Georgia, during the CRCT testing period, on or between the **21st day of April, 2009** and the **30th day of April, 2009**, the exact date(s) being unknown to the Grand Jurors at this time, did knowingly and willfully make and use false documents and writings, knowing the same to contain false entries, by falsifying students' answer sheets on the 2009 CRCT, thereby causing them to falsify their 2009 CRCT answers sheets at Dobbs Elementary School;

78) **DESSA CURB**, in the County of Fulton and State of Georgia, during the CRCT testing period, on or between the **21st day of April, 2009** and the **30th day of April, 2009**, the exact date(s) being unknown to the Grand Jurors at this time, did knowingly and willfully make and use false documents and writings, knowing the same to contain false entries, by falsifying students' answer sheets on the 2009 CRCT answer sheets for students at Dobbs Elementary School;

79) **DANA EVANS**, in the County of Fulton and State of Georgia, did knowingly and willfully make and use a false document and writing, by completing, signing, and submitting a CRCT School Certification Form for Dobbs Elementary School to APS dated the **30th day of April, 2009**, knowing the same to contain false statements, to wit:

(1) The written plans for testing were followed, including all directives in the *Examiner's Manual*, the *Testing Coordinator's Manual*, and system correspondence;

(2) There was ethical behavior on the part of [staff] involved in the test administration; any suspected testing irregularity/circumstance has been reported to the system coordinator;

all in a matter within the jurisdiction of APS, a political subdivision of the State of Georgia; the GaDOE and GOSA, departments or agencies of state government, which conduct constitutes racketeering activity pursuant to O.C.G.A. § 16-14-3(9)(A)(xv).

V. 2010: FALSE STATEMENTS AND WRITINGS, O.C.G.A. § 16-10-20

80) **DERRICK BROADWATER** and **SHAYLA SMITH**, in the County of Fulton and State of Georgia, during the CRCT testing period, on or between the **20th day of April, 2010** and the **30th day of April, 2010**, the exact date(s) being unknown to the Grand Jurors at this time, did knowingly and willfully make and use false documents and writings, knowing the same to contain false entries, by falsifying students' answer sheets on the 2010 CRCT, thereby causing them to falsify their 2010 CRCT answers sheets at Dobbs Elementary School;

81) **DANA EVANS**, in the County of Fulton and State of Georgia, did knowingly and willfully make and use a false document and writing, by completing, signing, and submitting a CRCT School Certification Form for Dobbs Elementary School to APS dated the 29th day of April, 2010, knowing the same to contain false statements, to wit:

- (1) The written plans for testing were followed, including all directives in the *Examiner's Manual*, the *Testing Coordinator's Manual*, and system correspondence;
- (2) There was ethical behavior on the part of [staff] involved in the test administration; any suspected testing irregularity/circumstance has been reported to the system coordinator;

all in a matter within the jurisdiction of APS, a political subdivision of the State of Georgia; the GaDOE and GOSA, departments or agencies of state government, which conduct constitutes racketeering activity pursuant to O.C.G.A. § 16-14-3(9)(A)(xv).

W. 2011: FALSE STATEMENTS AND WRITINGS, O.C.G.A. § 16-10-20

82) **DERRICK BROADWATER**, in the County of Fulton and State of Georgia, on or about the 8th day of February, 2011, did knowingly and willfully make a false statement to a GBI agent, to wit: that he did not participate in, assist with or have knowledge of anyone giving students answers during the CRCT;

83) **DESSA CURB**, in the County of Fulton and State of Georgia, on or about the 21st day of February, 2011, did knowingly and willfully make a false statement to a GBI agent, to wit: that she did not participate in, assist with or have knowledge of anyone erasing or changing answers on students' CRCT answer sheets;

84) **DANA EVANS** with in the County of Fulton and State of Georgia, on or about the 27th day of February, 2011 did knowingly and willfully make false statements to a GBI agent, in violation of O.C.G.A. § 16-10-20, to wit:

- a. That she did not hear anything about cheating at Dobbs Elementary School;
- b. That she did not allow teachers to cheat at Dobbs Elementary School;

85) **ANGELA WILLIAMSON** in the County of Fulton and State of Georgia, on or about the 1st day of March, 2011, did knowingly and willfully make a false statement to a GBI agent, to wit: that she did not participate in, assist with or have knowledge of anyone giving students answers during the CRCT;

all in a matter within the jurisdiction of APS, a political subdivision of the State of Georgia; the GaDOE and GOSA, departments or agencies of state government, which conduct constitutes racketeering activity pursuant to O.C.G.A. § 16-14-3(9)(A)(xv).

X. 2012: FALSE SWEARING, O.C.G.A. § 16-10-71

86) DERRICK BROADWATER, in the County of Fulton and State of Georgia, on or about the **25th day of April, 2012**, having been administered a lawful oath by a hearing officer authorized to conduct Fair Dismissal Act hearings pursuant to O.C.G.A. § 20-4-940, did knowingly, willfully, and falsely swear

- a. That he did not cheat on the CRCT at Dobbs Elementary School;
- b. That he did not give students answers on the CRCT;
- c. That he did not encourage students to erase and change their answers on the CRCT;

87) ANGELA WILLIAMSON, in the County of Fulton and State of Georgia, on or about the **9th day of June, 2012**, having been administered a lawful oath by a hearing officer authorized to conduct Fair Dismissal Act hearings pursuant to O.C.G.A. § 20-4-940, did knowingly, willfully, and falsely swear that she did not give students answers to the CRCT at Dobbs Elementary School;

88) SHAYLA SMITH, in the County of Fulton and State of Georgia, on or about the **27th day of August, 2012**, having been administered a lawful oath by a hearing officer authorized to conduct Fair Dismissal Act hearings pursuant to O.C.G.A. § 20-4-940, did knowingly, willfully, and falsely swear that she never gave any students answers on any CRCT;

89) ANGELA WILLIAMSON, with the offense of **FALSE SWEARING**, in violation of O.C.G.A. § 16-10-71, for the said accused, in the County of Fulton and State of Georgia, on or about the **1st day of December, 2012**, having been administered a lawful oath by a hearing officer authorized to conduct Fair Dismissal Act hearings pursuant to O.C.G.A. § 20-4-940, did knowingly, willfully, and falsely swear

- a. That she did not prompt or give students correct answers to the CRCT at Dobbs Elementary School;
- b. That she did not cheat at any point on the 2009 CRCT at Dobbs Elementary School;

which conduct constitutes racketeering activity pursuant to O.C.G.A. § 16-14-3(9)(A)(xv).

ACTS OF RACKETEERING CONCERNING DUNBAR ELEMENTARY SCHOOL

LERA MIDDLEBROOKS served as Principal of Dunbar Elementary School, in which capacity she was employed by and associated with APS. In her capacity as Principal, **LERA MIDDLEBROOKS** conspired and endeavored to violate the Georgia RICO Act through a pattern of racketeering activity, as described herein below in this Count.

PAMELA CLEVELAND served as a teacher at Dunbar Elementary School, in which capacity she was employed by and associated with APS. In her capacity as a teacher, **PAMELA CLEVELAND** conspired and endeavored to violate the Georgia RICO Act through a pattern of racketeering activity, as described herein below in this Count.

SHANI ROBINSON served as a teacher at Dunbar Elementary School, in which capacity she was employed by and associated with APS. In her capacity as a teacher, **SHANI ROBINSON** conspired and endeavored to violate the Georgia RICO Act through a pattern of racketeering activity, as described herein below in this Count.

GLORIA IVEY served as a teacher at Dunbar Elementary School, in which capacity she was employed by and associated with APS. In her capacity as a teacher, **GLORIA IVEY** conspired and endeavored to violate the Georgia RICO Act through a pattern of racketeering activity, as described herein below in this Count.

Y. 2009: FALSE STATEMENTS AND WRITINGS, O.C.G.A. § 16-10-20

90) **LERA MIDDLEBROOKS**, in the County of Fulton and State of Georgia, during the CRCT testing period, on or between the **21st day of April, 2009** and the **30th day of April, 2009**, the exact date(s) being unknown to the Grand Jurors at this time, did solicit Rose Neal to knowingly and willfully make and use false documents and writings, by asking her to participate in falsifying students' answer sheets on the 2009 CRCT for Dunbar Elementary School;

91) LERA MIDDLEBROOKS, SHANI ROBINSON, PAMELA CLEVELAND and DIANE BUCKNER WEBB, in the County of Fulton and State of Georgia, during the CRCT testing period, on or between the 21st day of April, 2009 and the 30th day of April, 2009, the exact date(s) being unknown to the Grand Jurors at this time, did knowingly and willfully make and use false documents and writings, knowing the same to contain false entries, by changing students' answers from wrong to right on the 2009 CRCT answer sheets for students at Dunbar Elementary School;

92) GLORIA IVEY, in the County of Fulton and State of Georgia, during the CRCT testing period, on or between the 21st day of April, 2009 and the 30th day of April, 2009, the exact date(s) being unknown to the Grand Jurors at this time, did knowingly and willfully make and use false documents and writings, knowing the same to contain false entries, by falsifying students' answer sheets on the 2009 CRCT, thereby causing them to falsify their 2009 CRCT answers sheets at Dunbar Elementary School;

93) LERA MIDDLEBROOKS, in the County of Fulton and State of Georgia, did knowingly and willfully make and use a false document and writing, by completing, signing, and submitting a CRCT School Certification Form for Dunbar Elementary School to APS dated the 4th day of May, 2009, knowing the same to contain false statements, to wit:

(1) The written plans for testing were followed, including all directives in the *Examiner's Manual*, the *Testing Coordinator's Manual*, and system correspondence;

(2) There was ethical behavior on the part of [staff] involved in the test administration; any suspected testing irregularity/circumstance has been reported to the system coordinator;

all in a matter within the jurisdiction of APS, a political subdivision of the State of Georgia; the GaDOE and GOSA, departments or agencies of state government, which conduct constitutes racketeering activity pursuant to O.C.G.A. § 16-14-3(9)(A)(xv).

Z. 2010: FALSE STATEMENTS AND WRITINGS, O.C.G.A. § 16-10-20

94) GLORIA IVEY, in the County of Fulton and State of Georgia, on or about the 18th day of October, 2010, did knowingly and willfully make a false statement to a GBI agent, to wit: that she did not participate in, assist with or have knowledge of anyone giving students answers to the CRCT;

95) DIANE WEBB BUCKNER, in the County of Fulton and State of Georgia, on or about the 19th day of October, 2010, did knowingly and willfully make a false statement to a GBI agent, to wit: that she did not participate in, assist with or have knowledge

96) **PAMELA CLEVELAND**, in the County of Fulton and State of Georgia, on or about the 19th day of October, 2010, did knowingly and willfully make a false statement to a GBI agent, to wit: that she did not participate in, assist with or have knowledge of anyone erasing or changing answers on students' CRCT answer sheets;

all in a matter within the jurisdiction of APS, a political subdivision of the State of Georgia; the GaDOE and GOSA, departments or agencies of state government, which conduct constitutes racketeering activity pursuant to O.C.G.A. § 16-14-3(9)(A)(xv).

AA. 2010: INFLUENCING WITNESSES, O.C.G.A. § 16-10-93

97) **LERA MIDDLEBROOKS**, in the County of Fulton and State of Georgia, on or about the 11th day of April, 2011, did knowingly intimidate Rose Neal, with the intent to hinder or delay the communication of information related to the commission of a criminal offense to GBI and other law enforcement officers investigating cheating in APS;

which conduct constitutes racketeering activity pursuant to O.C.G.A. § 16-14-3(9)(A)(xiv).

ACTS OF RACKETEERING CONCERNING HUMPHRIES ELEMENTARY SCHOOL

LISA TERRY served as a teacher at Humphries Elementary School, in which capacity she was employed by and associated with APS. In her capacity as a teacher, **LISA TERRY** conspired and endeavored to violate the Georgia RICO Act through a pattern of racketeering activity, as described herein below in this Count.

INGRID ABELLA-SLY served as a teacher at Humphries Elementary School, in which capacity she was employed by and associated with APS. In her capacity as a teacher, **INGRID ABELLA** conspired and endeavored to violate the Georgia RICO Act through a pattern of racketeering activity, as described herein below in this Count.

WENDY AHMED served as a teacher at Humphries Elementary School, in which capacity she was employed by and associated with APS. In her capacity as a teacher, **WENDY AHMED** conspired and endeavored to violate the Georgia RICO Act through a pattern of racketeering activity, as described herein below in this Count.

BB. 2009: FALSE STATEMENTS AND WRITINGS, O.C.G.A. § 16-10-20

98) **LISA TERRY, INGRID ABELLA-SLY and WENDY AHMED** with the offense of **FALSE STATEMENTS AND WRITINGS**, in the County of Fulton and State of Georgia, during the CRCT testing period, on or between the **21st day of April, 2009** and the **30th day of April, 2009**, the exact date(s) being unknown to the Grand Jurors at this time, did knowingly and willfully make and use false documents and writings, knowing the same to contain false entries, by falsifying students' answer sheets on the 2009 CRCT, thereby causing them to falsify their 2009 CRCT answers sheets at Humphries Elementary School;

all in a matter within the jurisdiction of APS, a political subdivision of the State of Georgia; the GaDOE and GOSA, departments or agencies of state government, which conduct constitutes racketeering activity pursuant to O.C.G.A. § 16-14-3(9)(A)(xv).

CC. 2009: THEFT BY TAKING, O.C.G.A. § 16-8-2

99) **LISA TERRY, INGRID ABELLA-SLY and WENDY AHMED**, in the County of Fulton and State of Georgia, on or about the **18th day of December, 2009**, and while employees of a government institution in breach of their duties as such government employees, did unlawfully take U.S. currency, the property of APS, with the intention of depriving said owner of said property, by causing APS to issue each of the accused a bonus check based on falsified test results on the 2009 CRCT for Humphries Elementary School;

which conduct constitutes racketeering activity pursuant to O.C.G.A. § 16-14-3(9)(A)(ix).

DD. 2010: FALSE STATEMENTS AND WRITINGS, O.C.G.A. § 16-10-20

100) **INGRID ABELLA-SLY**, in the County of Fulton and State of Georgia, on or about the **27th day of October, 2010**, did knowingly and willfully make a false statement to a GBI agent, to wit: that she did not participate in, assist with or have knowledge of anyone giving students answers to the CRCT;

101) **WENDY AHMED**, in the County of Fulton and State of Georgia, on or about the **27th day of October, 2010**, did knowingly and willfully make a false statement to a GBI agent, to wit: that she did not participate in, assist with or have knowledge of anyone giving students answers to the CRCT;

all in a matter within the jurisdiction of APS, a political subdivision of the State of Georgia; the GaDOE and GOSA, departments or agencies of state government, which conduct constitutes racketeering activity pursuant to O.C.G.A. § 16-14-3(9)(A)(xv).

ACTS OF RACKETEERING CONCERNING KENNEDY MIDDLE SCHOOL

LUCIOUS BROWN served as Principal of Kennedy Middle School, in which capacity he was employed by and associated with APS. In his capacity as Principal, **LUCIOUS BROWN** conspired and endeavored to violate the Georgia RICO Act through a pattern of racketeering activity, as described herein below in this Count.

CAROL DENNIS served as the secretary at Kennedy Middle School, in which capacity she was employed by and associated with APS. In her capacity as a secretary, **CAROL DENNIS** conspired and endeavored to violate the Georgia RICO Act through a pattern of racketeering activity, as described herein below in this Count.

TAMEKA GOODSON served as an Instructional Coach at Kennedy Middle School, in which capacity she was employed by and associated with APS. In her capacity as an Instructional Coach, **TAMEKA GOODSON** conspired and endeavored to violate the Georgia RICO Act through a pattern of racketeering activity, as described herein below in this Count.

EE. 2009: FALSE STATEMENTS AND WRITINGS, O.C.G.A. § 16-10-20

102) **LUCIOUS BROWN**, in the County of Fulton and State of Georgia, during the CRCT testing period, on or between the **21st day of April, 2009** and the **30th day of April, 2009**, the exact date(s) being unknown to the Grand Jurors at this time, did solicit Barbara McDaniel to knowingly and willfully make and use false documents and writings, by asking her to participate in falsifying students' answer sheets on the 2009 CRCT for Kennedy Middle School;

103) **LUCIOUS BROWN, CAROL DENNIS and TAMEKA GOODSON**, in the County of Fulton and State of Georgia, during the CRCT testing period, on or between the **21st day of April, 2009** and the **30th day of April, 2009**, the exact date(s) being unknown to the Grand Jurors at this time, did knowingly and willfully make and use false documents and writings, knowing the same to contain false entries, by changing students' answers from wrong to right on the 2009 CRCT answer sheets for students at Kennedy Middle School;

104) **LUCIOUS BROWN**, in the County of Fulton and State of Georgia, did knowingly and willfully make and use a false document and writing, by completing, signing, and submitting a CRCT School Certification Form for Kennedy Middle School to APS dated the **30th day of April, 2009**, knowing the same to contain false statements, to wit:

- (1) The written plans for testing were followed, including all directives in the *Examiner's Manual*, the *Testing Coordinator's Manual*, and system correspondence; and
- (2) There was ethical behavior on the part of [staff] involved in the test administration; any suspected testing irregularity/circumstance has been reported to the system coordinator;

all in a matter within the jurisdiction of APS, a political subdivision of the State of Georgia; the GaDOE and GOSA, departments or agencies of state government, which conduct constitutes racketeering activity pursuant to O.C.G.A. § 16-14-3(9)(A)(xv).

ACTS OF RACKETEERING CONCERNING DEERWOOD ACADEMY

TABEEKA JORDAN served as a teacher at Deerwood Academy, in which capacity she was employed by and associated with APS. In her capacity as a teacher, **TABEEKA JORDAN** conspired and endeavored to violate the Georgia RICO Act through a pattern of racketeering activity, as described herein below in this Count.

FF.2008: FALSE STATEMENTS AND WRITINGS, O.C.G.A. § 16-10-20

105) **TABEEKA JORDAN**, in the County of Fulton and State of Georgia, during the CRCT testing period, on or between the **21st day of April, 2008** and the **1st day of May, 2008**, the exact date(s) being unknown to the Grand Jurors at this time, did solicit Lavonia Ferrell to knowingly and willfully make and use false documents and writings, by asking her to participate in falsifying students' answer sheets on the Summer 2008 CRCT Retest for students at Deerwood Academy;

106) **TABEEKA JORDAN**, in the County of Fulton and State of Georgia, during the CRCT testing period, on or between the **21st day of April, 2008** and the **1st day of May, 2008**, the exact date(s) being unknown to the Grand Jurors at this time, did solicit Margaret Merkersen to knowingly and willfully make and use false documents and writings, by asking her to participate in falsifying students' answer sheets on the Summer 2008 CRCT Retest for students at Deerwood Academy;

- 107) **TABEEKA JORDAN**, in the County of Fulton and State of Georgia, during the CRCT testing period, on or between the **21st day of April, 2008** and the **1st day of May, 2008**, the exact date(s) being unknown to the Grand Jurors at this time, did knowingly and willfully make and use false documents and writings, knowing the same to contain false entries, by erasing and changing students' answers from wrong to right on the Summer 2008 CRCT Retest for students at Deerwood Academy;

all in a matter within the jurisdiction of APS, a political subdivision of the State of Georgia; the GaDOE and GOSA, departments or agencies of state government, which conduct constitutes racketeering activity pursuant to O.C.G.A. § 16-14-3(9)(A)(xv).

GG. 2009: FALSE STATEMENTS AND WRITINGS, O.C.G.A. § 16-10-20

- 108) **TABEEKA JORDAN**, in the County of Fulton and State of Georgia, during the CRCT testing period, on or between the **21st day of April, 2009** and the **1st day of May, 2008**, the exact date(s) being unknown to the Grand Jurors at this time, did solicit Lavonia Ferrell to knowingly and willfully make and use false documents and writings, by asking her to participate in falsifying students' answer sheets on the 2009 CRCT answer sheets for students at Deerwood Academy;
- 109) **TABEEKA JORDAN**, in the County of Fulton and State of Georgia, during the CRCT testing period, on or between the **21st day of April, 2009** and the **30th day of April, 2009**, the exact date(s) being unknown to the Grand Jurors at this time, did solicit Margaret Merkerson to knowingly and willfully make and use false documents and writings, by asking her to participate in falsifying students' answer sheets on the 2009 CRCT answer sheets for students at Deerwood Academy;
- 110) **TABEEKA JORDAN**, in the County of Fulton and State of Georgia, during the CRCT testing period, on or between the **21st day of April, 2009** and the **30th day of April, 2009**, the exact date(s) being unknown to the Grand Jurors at this time, did knowingly and willfully make and use false documents and writings, knowing the same to contain false entries, by falsifying students' answer sheets on the 2009 CRCT answer sheets for students at Deerwood Academy;

all in a matter within the jurisdiction of APS, a political subdivision of the State of Georgia; the GaDOE and GOSA, departments or agencies of state government, which conduct constitutes racketeering activity pursuant to O.C.G.A. § 16-14-3(9)(A)(xv).

HH. 2009: THEFT BY TAKING, O.C.G.A. § 16-8-2

- 111) **TABEEKA JORDAN**, in the County of Fulton and State of Georgia, on or about the **18th day of December, 2009**, and while an employee of a government institution in breach of her duties as such government employee, did unlawfully take U.S. currency, the property of APS, with the intention of depriving said owner of said property by causing APS to issue the accused a bonus check based on falsified test results on the 2009 CRCT for Deerwood Academy;

which conduct constitutes racketeering activity pursuant to O.C.G.A. § 16-14-3(9)(A)(ix).

ACTS OF RACKETEERING CONCERNING VENETIAN HILLS ELEMENTARY SCHOOL

CLARIETTA DAVIS served as Principal of Venetian Hills Elementary School, in which capacity she was employed by and associated with APS. In her capacity as Principal, **CLARIETTA DAVIS** conspired and endeavored to violate the Georgia RICO Act through a pattern of racketeering activity, as described herein below in this Count.

II. 2009: FALSE STATEMENTS AND WRITINGS, O.C.G.A. § 16-10-20

- 112) **CLARIETTA DAVIS**, in the County of Fulton and State of Georgia, during the CRCT testing period, on or between the **21st day of April, 2009** and the **30th day of April, 2009**, the exact date(s) being unknown to the Grand Jurors at this time, did solicit Milagros Moner to knowingly and willfully make and use false documents and writings, by asking her to participate in falsifying students' answer sheets on the 2009 CRCT answer sheets for students at Venetian Hills Elementary School;
- 113) **CLARIETTA DAVIS**, in the County of Fulton and State of Georgia, during the CRCT testing period on or between the **21st day of April, 2009** and the **30th day of April, 2009**, the exact date(s) being unknown to the Grand Jurors at this time, did knowingly and willfully make and use false documents and writings, knowing the same to contain false entries, by falsifying students' answer sheets on the 2009 CRCT answer sheets for students at Venetian Hills Elementary School;

114) CLARIETTA DAVIS, in the County of Fulton and State of Georgia, did knowingly and willfully make and use a false document and writing, by completing, signing, and submitting a CRCT School Certification Form for Venetian Hills Elementary School to APS dated the 30th day of April, 2009, knowing the same to contain false statements, to wit:

- (1) The written plans for testing were followed, including all directives in the *Examiner's Manual*, the *Testing Coordinator's Manual*, and system correspondence; and
- (2) There was ethical behavior on the part of [staff] involved in the test administration; any suspected testing irregularity/circumstance has been reported to the system coordinator;

all in a matter within the jurisdiction of APS, a political subdivision of the State of Georgia; the GaDOE and GOSA, departments or agencies of state government, which conduct constitutes racketeering activity pursuant to O.C.G.A. § 16-14-3(9)(A)(xv).

JJ. 2009: THEFT BY TAKING, O.C.G.A. § 16-8-2

115) CLARIETTA DAVIS, in the County of Fulton and State of Georgia, during the CRCT testing period on or about the 18th day of December, 2009, and while an employee of a government institution in breach of her duties as such government employee, did unlawfully take U.S. currency, the property of APS, with the intention of depriving said owner of said property by causing APS to issue the accused a bonus check based on falsified test results on the 2009 CRCT for Venetian Hills Elementary School;

which conduct constitutes racketeering activity pursuant to O.C.G.A. § 16-14-3(9)(A)(ix).

**ACTS OF RACKETEERING CONCERNING B.E. USHER/COLLIER HEIGHTS
ELEMENTARY SCHOOL**

DONALD BULLOCK served as testing coordinator at Usher/Collier Heights Elementary School, in which capacity he was employed by and associated with APS. In his capacity as testing coordinator, DONALD BULLOCK conspired and endeavored to violate the Georgia RICO Act through a pattern of racketeering activity, as described herein below in this Count.

KK. 2009: FALSE STATEMENTS AND WRITINGS, O.C.G.A. § 16-10-20

- 116) DONALD BULLOCK, in the County of Fulton and State of Georgia, during the CRCT testing period, on or between the 21st day of April, 2009 and the 30th day of April, 2009, the exact date(s) being unknown to the Grand Jurors at this time, did solicit Mary Ware to knowingly and willfully make and use false documents and writings, by asking her to participate in falsifying students' answer sheets on the 2009 CRCT answer sheets for students at Usher/Collier Heights Elementary School;
- 117) DONALD BULLOCK, in the County of Fulton and State of Georgia, during the CRCT testing period, on or between the 21st day of April, 2009 and the 30th day of April, 2009, the exact date(s) being unknown to the Grand Jurors at this time, did solicit Stacy Smith to knowingly and willfully make and use false documents and writings, by asking her to participate in falsifying students' answer sheets on the 2009 CRCT answer sheets for students at Usher/Collier Heights Elementary School;
- 118) DONALD BULLOCK, in the County of Fulton and State of Georgia, on or between the 28th day of April, 2009 and the 4th day of May, 2009, did knowingly and willfully make and use a false document and writing, knowing the same to contain false statements, by completing, signing, and submitting a CRCT School Certification Form for Usher/Collier Heights Elementary School to APS, to wit:
- (1) The written plans for testing were followed, including all directives in the *Examiner's Manual*, the *Testing Coordinator's Manual*, and system correspondence; and
 - (2) There was ethical behavior on the part of [staff] involved in the test administration; any suspected testing irregularity/circumstance has been reported to the system coordinator;

all in a matter within the jurisdiction of APS, a political subdivision of the State of Georgia; the GaDOE and GOSA, departments or agencies of state government, which conduct constitutes racketeering activity pursuant to O.C.G.A. § 16-14-3(9)(A)(xv).

LL. 2010: FALSE STATEMENTS AND WRITINGS, O.C.G.A. § 16-10-20

119) **DONALD BULLOCK**, in the County of Fulton and State of Georgia, on or about the **26th day of October, 2010**, did knowingly and willfully make false statements to a GBI agent, to wit:

- a. That he did not assist with anyone with getting tests to change answers on students' CRCT answer sheets;
- b. That he was not aware of any teachers erasing anything on students' CRCT tests in 2009;

in a matter within the jurisdiction of APS, a political subdivision of the State of Georgia; the GaDOE and GOSA, being departments or agencies of state government, which conduct constitutes racketeering activity pursuant to O.C.G.A. § 16-14-3(9)(A)(xv).

MM. 2010: FALSE SWEARING, O.C.G.A. § 16-10-71

120) **DONALD BULLOCK**, in the County of Fulton and State of Georgia, on or about the **23rd day of April, 2012**, having been administered a lawful oath by a hearing officer authorized to conduct Fair Dismissal Act hearings pursuant to O.C.G.A. § 20-4-940, did knowingly, willfully, and falsely swear that he followed the testing guidelines and did not allow teachers improper access to testing materials;

which conduct constitutes racketeering activity pursuant to O.C.G.A. § 16-14-3(9)(A)(xv).

ACTS OF RACKETEERING CONCERNING BENTEN ELEMENTARY SCHOOL

SHEILA EVANS served as a teacher at Benteen Elementary School, in which capacity she was employed by and associated with APS. In her capacity as a teacher, **SHEILA EVANS** conspired and endeavored to violate the Georgia RICO Act through a pattern of racketeering activity, as described herein below in this Count.

THERESIA COPELAND served as testing coordinator at Benteen Elementary School, in which capacity she was employed by and associated with APS. In her capacity as testing coordinator, **THERESIA COPELAND** conspired and endeavored to violate the Georgia RICO Act through a pattern of racketeering activity, as described herein below in this Count.

NN. **2009: FALSE STATEMENTS AND WRITINGS, O.C.G.A. § 16-10-20**

121) **SHEILA EVANS**, in the County of Fulton and State of Georgia, during the CRCT testing period, on or between the **21st day of April, 2009** and the **30th day of April, 2009**, the exact date(s) being unknown to the Grand Jurors at this time, did knowingly and willfully make and use false documents and writings, knowing the same to contain false entries, by falsifying students' answer sheets on the 2009 CRCT, thereby causing them to falsify their 2009 CRCT answers sheets at Benteen Elementary School;

122) **THERESIA** in the County of Fulton and State of Georgia, on or about the **30th day of April, 2009**, did knowingly and willfully make and use a false document and writing, knowing the same to contain false statements, by completing, signing, and submitting a CRCT School Certification Form for Benteen Elementary School to APS, to wit:

(1) The written plans for testing were followed, including all directives in the *Examiner's Manual*, the *Testing Coordinator's Manual*, and system correspondence; and

(2) There was ethical behavior on the part of all staff and all students involved in the test administration; any suspected testing irregularity/circumstance has been reported to the system coordinator;

all in a matter within the jurisdiction of APS, a political subdivision of the State of Georgia; the GaDOE and GOSA, departments or agencies of state government, which conduct constitutes racketeering activity pursuant to O.C.G.A. § 16-14-3(9)(A)(xv).

OO. 2009: THEFT BY TAKING, O.C.G.A. § 16-8-2

- 123) **THERESIA COPELAND** and **SHEILA EVANS**, in the County of Fulton and State of Georgia, on or about the **18th day of December, 2009**, and while employees of a government institution in breach of their duties as government employees, did unlawfully take U.S. currency, the property of APS, with the intention of depriving said owner of said property, by causing APS to issue each of the accused a bonus check based on falsified test results on the 2009 CRCT for Benteen Elementary School;

which conduct constitutes racketeering activity pursuant to O.C.G.A. § 16-14-3(9)(A)(ix).

PP.2010: FALSE STATEMENTS AND WRITINGS, O.C.G.A. § 16-10-20

- 124) **THERESIA COPELAND** with the offense of **FALSE STATEMENTS AND WRITINGS**, in violation of O.C.G.A. § 16-10-20, for the said accused, in the County of Fulton and State of Georgia, on or about the **10th day of November, 2010**, did knowingly and willfully make false statements to a GBI agent, to wit:

- a. That she knew nothing about anyone cheating on the test;
- b. That she followed testing protocol and tests were put back in the vault after the materials were returned from teachers;
- c. That she was not involved in cheating at Benteen Elementary School;

all in a matter within the jurisdiction of APS, a political subdivision of the State of Georgia; the GaDOE and GOSA, departments or agencies of state government, which conduct constitutes racketeering activity pursuant to O.C.G.A. § 16-14-3(9)(A)(xv).

ACTS OF RACKETEERING CONCERNING D.H. STANTON ELEMENTARY SCHOOL

WILLIE DAVENPORT served as Principal at D.H. Stanton Elementary School, in which capacity she was employed by and associated with APS. In her capacity as testing coordinator, **WILLIE DAVENPORT** conspired and endeavored to violate the Georgia RICO Act through a pattern of racketeering activity, as described herein below in this Count.

FRANCIS MACK served as testing coordinator at D.H. Stanton Elementary School, in which capacity she was employed by and associated with APS. In her capacity as testing coordinator, FRANCIS MACK conspired and endeavored to violate the Georgia RICO Act through a pattern of racketeering activity, as described herein below in this Count.

QQ. 2009: FALSE STATEMENTS AND WRITINGS, O.C.G.A. § 16-10-20

125) WILLIE DAVENPORT, in the County of Fulton and State of Georgia, on or between the 30th day of April, 2009 and the 30th day of May, 2009, the exact date(s) being unknown to the Grand Jurors at this time, did knowingly and willfully make and use false documents and writings, knowing the same to contain false entries, by submitting to APS attendance records for students at D.H. Stanton Elementary School reflecting students as present when they were absent from school;

126) WILLIE DAVENPORT and FRANCIS MACK, in the County of Fulton and State of Georgia, on or about the 1st day of May, 2009, did knowingly and willfully make and use a false document and writing, knowing the same to contain false statements, by completing, signing, and submitting a CRCT School Certification Form for D.H. Stanton Elementary School to APS, to wit:

- (1) All test materials were stored in a locked central location prior to, during, and after the test administration each day;
- (2) The written plans for testing were followed, including all directives in the *Examiner's Manual*, the *Testing Coordinator's Manual*, and system correspondence; and
- (3) There was ethical behavior on the part of [staff] involved in the test administration; any suspected testing irregularity/circumstance has been reported to the system coordinator;

all in a matter within the jurisdiction of APS, a political subdivision of the State of Georgia; the GaDOE and GOSA, departments or agencies of state government, which conduct constitutes racketeering activity pursuant to O.C.G.A. § 16-14-3(9)(A)(xv).

OVERT ACTS IN FURTHERANCE OF THE CONSPIRACY

1.

On or about the 31st day of May, 2005, after Carver High School Principal Tony Overstreet was notified that his contract with APS would not be renewed, Superintendent **BEVERLY HALL** told Mr. Overstreet that she was "not interested in incremental gains."

2.

On or between the 3rd day of August, 2005 and the 4th day of August, 2005, the APS Office of Internal Resolution ("OIR") investigated a cheating allegation by Leah Cauley, a teacher at C.W. Hill Elementary School. At the conclusion of OIR's investigation, **BEVERLY HALL** approved a 20 day suspension for the teacher OIR confirmed to have cheated. **BEVERLY HALL** terminated the whistleblower, Leah Cauley.

3.

On or between the 4th day of January, 2006 and the 11th day of January, 2006, Stacey Johnson told **MICHAEL PITTS**, the Executive Director of SRT-2, that **CHRISTOPHER WALLER** was pressuring teachers to cheat on the spring 2006 CRCT. **MICHAEL PITTS** did not report the allegation to APS for investigation.

4.

On or between the 4th day of January, 2006 and the 28th day of February, 2006, Tameka Grant informed **MICHAEL PITTS** that **CHRISTOPHER WALLER** was pressuring teachers to cheat on the spring 2006 CRCT. Although **MICHAEL PITTS** was the Executive Director of SRT-2, he did not report the allegation to APS for investigation.

5.

On or between the 10th day of January, 2006 and the 23rd day of January, 2006, **BEVERLY HALL** received a complaint which alleged cheating on the Eighth Grade Writing Assessment at Parks Middle School. As Superintendent of APS, **BEVERLY HALL** had a statutory duty to report testing violations to the GaDOE pursuant to O.C.G.A. § 20-2-109, but she failed to make the required report.

6.

On or about the 12th day of January, 2006, after receiving a complaint that **CHRISTOPHER WALLER** was pressuring teachers to cheat on the Spring 2006 CRCT, **MICHAEL PITTS** attended a faculty meeting at Parks Middle School and told the staff to "stop complaining" about **CHRISTOPHER WALLER** because no complaints would affect his status as the principal of Parks Middle School.

7.

On or about the 13th day of January, 2006, **BEVERLY HALL** and **MICHAEL PITTS** received a complaint which alleged that **CHRISTOPHER WALLER** was falsifying student attendance and records for student participation in after school tutorial services. The complaint further alleged that **CHRISTOPHER WALLER** was sexually harassing female employees and pressuring teachers to cheat on the Spring 2006 CRCT at Parks Middle School. **BEVERLY HALL** sent a memorandum with a copy of the complaint to **MILLCENT FEW**, Chief Human Resources Officer for APS. The memorandum read, "Please investigate and inform me." **BEVERLY HALL** scratched out the words "inform me."

8.

On or about the 17th day of January, 2006, **CHRISTOPHER WALLER** submitted a letter to **MICHAEL PITTS** requesting that whistleblowers Stacey Johnson and Tameka Grant be administratively transferred out of Parks Middle School.

9.

On or about the 17th day of January, 2006, **MICHAEL PITTS** was interviewed by Reginal Dukes, a private investigator hired by APS to investigate the Parks Middle School complaints. At the time of the interview, **MICHAEL PITTS** had directly received a complaint from Stacey Johnson that **CHRISTOPHER WALLER** was pressuring teachers to cheat on the upcoming spring 2006 CRCT. When Reginal Dukes asked **MICHAEL PITTS** if any concerns had come to his attention relevant to Dukes' investigation, **MICHAEL PITTS** intentionally withheld his knowledge of this complaint.

10.

On or about the 8th day of February, 2006, after being retaliated against by **CHRISTOPHER WALLER** when she reported that **CHRISTOPHER WALLER** was pressuring teachers to cheat, Stacey Johnson resigned. Before Ms. Johnson could collect her belongings, **CHRISTOPHER WALLER** directed a school resource officer to escort her off the property. At the time she left, she informed **MICHAEL PITTS** about **CHRISTOPHER WALLER's** pattern of sexual harassment and retaliation against her. Although **MICHAEL PITTS** was the Executive Director of SRT-2, he failed to report the allegations to APS for investigation.

11.

On or about the 15th day of March, 2006, Reginal Dukes, an external investigator hired by APS to investigate the Parks Middle School complaints, sent APS his preliminary findings. Mr. Dukes reported that, among other things, the Georgia Eighth Grade Writing Assessment "may have been compromised" after **CHRISTOPHER WALLER** "persuaded,[sic] coerced teachers to cheat on the test" and **CHRISTOPHER WALLER** was "threatening and intimidating teachers not to reveal information pertinent to [Dukes'] investigation." Despite Dukes' report, **BEVERLY HALL** took no action against **CHRISTOPHER WALLER**.

12.

On or about the 10th day of May, 2006, Reginal Dukes met with **BEVERLY HALL**, **MICHAEL PITTS**, and **MILLCENT FEW** to discuss his investigative conclusions. At this meeting, **MICHAEL PITTS** withheld his knowledge of the complaints he received from Stacey Johnson and Tameka Grant that **CHRISTOPHER WALLER** had pressured teachers to cheat on the Spring 2006 CRCT.

13.

On or between the 10th day of May, 2006 and the 30th day of June, 2006, **BEVERLY HALL** received Reginal Dukes' final investigative conclusions that employees at Parks Middle School cheated on the Eighth Grade Writing Assessment by preparing students with a nearly identical writing prompt prior to the administration of the test. The writing prompt is the topic statement that students are required to write an essay-style discussion to test their writing abilities. Mr. Dukes also advised that there was reason for concern about the accuracy of student attendance and grades at Parks Middle School; that further investigation was needed into **CHRISTOPHER WALLER's** questionable managerial practices; and that the security of the Spring 2006 CRCT may have been compromised. **BEVERLY HALL** had a statutory duty to report testing violations to the GaDOE pursuant to O.C.G.A. § 20-2-109, but she did not make the required report. **BEVERLY HALL** took no action against **CHRISTOPHER WALLER** after receiving the final report.

14.

On or between the 10th day of May, 2006 and the 30th day of May, 2006, **BEVERLY HALL** received the Spring 2006 CRCT results for APS, which included the results for Parks Middle School. The results showed large score gains for Parks Middle School compared to the school's performance the previous year. As a result of the Spring 2006 CRCT results, Parks Middle School achieved both AYP and its APS targets for the first time. Despite **BEVERLY HALL's** knowledge of Dukes' report concerning cheating at Parks Middle School, **BEVERLY HALL** did not report this information to the GaDOE.

15.

On or about the 10th day of May, 2006 and the 20th day of December, 2006, after observing the Spring 2006 CRCT results showing large score increases at Parks Middle School, and despite her knowledge of Reginal Dukes' investigative conclusions and previous complaints that **CHRISTOPHER WALLER** had pressured teachers to cheat, **BEVERLY HALL** approved monetary bonuses for **CHRISTOPHER WALLER** and the Parks Middle School employees.

16.

On or about the 4th day of August, 2006, Tameka Grant was transferred out of Parks Middle School by **MICHAEL PITTS**. This action was taken after Tameka Grant complained directly to **MICHAEL PITTS** earlier that year that **CHRISTOPHER WALLER** was pressuring teachers to cheat on the Spring 2006 CRCT.

17.

On or between the 20th day of September, 2006, **BEVERLY HALL** met with Justina Collins, a Cascade Elementary School parent who raised concerns about the improbability of her daughter's high CRCT scores relative to her actual academic performance. Following that meeting, on or about the 15th day of November, 2006, **BEVERLY HALL** sent Ms. Collins a letter stating that no testing violations occurred with respect to her daughter's CRCT administration.

18.

On or between the 1st day of April, 2007 and the 30th day of August, 2007, **BEVERLY HALL** met with a representative of the Annie E. Casey Foundation regarding the Foundation's interest in helping retain **CHRISTOPHER WALLER** as Principal of Parks Middle School. Despite **BEVERLY HALL**'s knowledge of Reginal Dukes' investigative conclusions and previous complaints that **CHRISTOPHER WALLER** pressured teachers to cheat, **BEVERLY HALL** encouraged the Annie E. Casey Foundation to pay **CHRISTOPHER WALLER** additional money for the purpose of keeping him employed at APS, without informing the Foundation of the cheating complaints at the school.

19.

On or about the 14th day of August, 2007, **BEVERLY HALL** was interviewed by the Annie E. Casey Foundation about the dramatic turnaround at Parks Middle School. Despite **BEVERLY HALL**'s knowledge of Reginal Dukes' investigative conclusions and previous complaints, including the complaints that **CHRISTOPHER WALLER** pressured teachers to cheat on the Spring 2006 CRCT, **BEVERLY HALL** withheld this information and instead praised **CHRISTOPHER WALLER** for his leadership at Parks Middle School.

20.

On or about the 24th day of October, 2007, **MICHAEL PITTS** submitted a letter of recommendation on behalf of **CHRISTOPHER WALLER** for the Atlanta Families Award which included a payment of \$7500. **MICHAEL PITTS** touted **CHRISTOPHER WALLER**'s "dynamic work ethic" and "noteworthy accomplishments throughout his lucrative career within the Atlanta Public School System," even though **MICHAEL PITTS** had knowledge of **CHRISTOPHER WALLER**'s sexual harassment complaints and complaints that he pressured teachers to cheat on the Spring 2006 CRCT.

21.

On or about the 31st day of January, 2008, the State of Georgia Superintendent of Schools Office forwarded an anonymous letter to **BEVERLY HALL** stating that cheating had occurred on the CRCT at Coan Middle School for the last three years. **BEVERLY HALL** did not complete an investigation into this allegation.

22.

On or between the 31st day of January, 2008 and the 31st day of December, 2008, Imogene Redwine, a special education teacher at Brown Middle School, initiated a grievance about being placed on a PDP for her students' low test scores. During the grievance process, Ms. Redwine submitted a cheating complaint to OIR and notified SRT-1 Executive Director **SHARON DAVIS-WILLIAMS** that she was being harassed and retaliated against by the principal. **SHARON DAVIS-WILLIAMS** denied the grievance and Ms. Redwine was notified that her complaints of cheating and retaliation were unfounded.

23.

On or between the 21st day of April, 2008 and the 15th day of July, 2008, Keylina Clark, a parent at Blalock Elementary School, reported to SRT-4 Executive Director, **TAMARA COTMAN** that her child's teacher gave students the answers during the Spring 2008 CRCT at Blalock Elementary School. Despite **TAMARA COTMAN**'s promise that she would investigate the matter, Ms. Clark never received any further communication regarding her concerns. **TAMARA COTMAN** did not report the complaint to APS for investigation.

24.

On or about the 15th day of July, 2008, Keylina Clark contacted OIR and filed a cheating complaint after receiving no response from **TAMARA COTMAN** regarding her complaint that her child's teacher gave students answers during the Spring 2008 CRCT at Blalock Elementary School. On or about the 12th day of September, 2008, **BEVERLY HALL** issued a letter to Ms. Clark informing her that there was no reasonable basis to conclude that a violation occurred.

25.

On or between the 1st day of February, 2009 and the 21st day of April, 2009, **WILLIE DAVENPORT**, Principal of D.H. Stanton Elementary School, withdrew students prior to the Spring 2009 CRCT administration because she believed the students would not perform well on the test and would negatively affect the school's AYP and targets.

26.

On or about the 14th day of April, 2009 Kathleen Mathers, the Director for GOSA, spoke with **BEVERLY HALL** regarding GOSA's concerns about testing improprieties during the Summer 2008 CRCT Retest at Deerwood Academy. Ms. Mathers strongly urged **BEVERLY HALL** to increase the testing security for the Spring 2009 CRCT administration at Deerwood Academy. **BEVERLY HALL** indicated that she would provide the additional security, but failed to do so.

27.

On or between the 14th day of April, 2009 and the 25th day of August, 2009, **MILLICENT FEW** withheld Reginal Dukes' Parks Middle School investigative report and other responsive OIR cheating related documents from the Atlanta Journal Constitution ("AJC") in response to an Open Records Act request for "all complaints supporting documentation, findings and any and all related documents made to the Office of Internal Resolution since March 2006 concerning allegations of Employee Wrongdoing involving all types of parties in the following categories: Misrepresentation/Falsification (Testing, Grading, Applications, other instruction), Public Funds/Property and Improper Remunerative Conduct."

28.

On or between the 14th day of April, 2009 and the 25th day of August, 2009, **MILLICENT FEW** withheld OIR's complete list of complaints involving testing misconduct from the AJC in response to an Open Records Act request for "all complaints supporting documentation, findings and any and all related documents made to the Office of Internal Resolution since March 2006 concerning allegations of Employee Wrongdoing involving all types of parties in the following categories: Misrepresentation/Falsification (Testing, Grading, Applications, other instruction), Public Funds/Property and Improper Remunerative Conduct."

29.

On or about the 8th day of May, 2009, **SHARON DAVIS-WILLIAMS** issued a memorandum of understanding to Dr. Jackie Boyce regarding an incident at Herndon Elementary School where students told Dr. Boyce that their teacher had given them answers on the CRCT. **SHARON DAVIS-WILLIAMS** stated that the allegation of cheating had been investigated and was determined to be unfounded. **SHARON DAVIS-WILLIAMS** also reprimanded Dr. Boyce about the incident. Contrary to **SHARON DAVIS-WILLIAMS'** statement that the matter had been investigated, the allegation was never submitted to OIR for investigation.

30.

On or about the 9th day of June, 2009, after several unsuccessful attempts by Kathleen Mathers to meet with **BEVERLY HALL** to deliver GOSA's preliminary report concerning the Deerwood Academy Summer 2008 CRCT Retest Audit, two GOSA employees attended APS' leadership retreat, where **BEVERLY HALL** was speaking. The GOSA employees hand delivered the report to **BEVERLY HALL**, despite her attempts to avoid receiving the report.

31.

On or about the 19th day of June, 2009, APS hired an external investigator, Attorney Penn Payne, to investigate the allegations in GOSA's Deerwood Academy audit report. On or between the 23rd day of June, 2009 and the 15th day of July, 2009, **BEVERLY HALL** instructed **MILLCENT FEW** to ensure that OIR destroy drafts of Penn Payne's Deerwood Academy investigation, including Ms. Payne's initial draft, which stated that cheating may have occurred. **MILLCENT FEW** instructed Colinda Howard, the Director of OIR, to destroy the drafts. **MILLCENT FEW** ensured the documents were destroyed by watching Ms. Howard shred all drafts.

32.

On or about the 7th day of July, 2009, **BEVERLY HALL** issued a letter to Kathleen Mathers representing that APS' internal investigation was complete and found no basis to substantiate allegations that cheating took place at Deerwood Academy. **BEVERLY HALL** issued this statement although Ms. Payne's investigation was not complete and **BEVERLY HALL** had not received Ms. Payne's final report on the Deerwood Academy investigation.

33.

On or about the 4th day of August, 2009, the State of Georgia Superintendent of School's Office forwarded an anonymous letter to **BEVERLY HALL** and **MILLCENT FEW** which stated that "retaliation runs rampant within APS" against educators who speak out about cheating. The letter appealed for an investigation into cheating be conducted in APS schools. **BEVERLY HALL** and **MILLCENT FEW** did not complete an investigation into this allegation.

34.

On or about the 13th day of November 2009, **BEVERLY HALL** announced that two experts were being hired to investigate claims of possible cheating raised by an October, 2009 Atlanta Journal Constitution ("AJC") article regarding APS schools that had "highly improbable" test score gains. Doug Reeves, an instructional consultant, was asked to make a "brief inquiry" into the instructional practices in the schools and give an opinion as to whether those practices could have contributed to the score increases. Andrew Porter, a statistician, was asked to determine the "accuracy and validity of the AJC's findings and identify alternative explanations for what [was] found." **BEVERLY HALL** promised that upon completion, both reports would be made public.

35.

On or about the 27th day of April, 2010, **MICHAEL PITTS** was interviewed by KPMG representatives, Aneil Sharma and Chris Roane in connection with the Blue Ribbon Commission's ("BRC") investigation into cheating on the 2009 CRCT. Despite his knowledge about the previous complaints he received from both Stacey Johnson and Tameka Grant, and his knowledge of Reginal Dukes' investigative conclusions from 2006, when **MICHAEL PITTS** was asked about his knowledge of cheating on the CRCT, he withheld this information.

36.

On or about the 18th day of May, 2010, Andrew Porter emailed his final report to **BEVERLY HALL**. Mr. Porter's report concluded that while the test results did not prove that cheating occurred, "they do point to student achievement gains and losses that are highly unusual and for which cheating could be one explanation." **BEVERLY HALL** did not communicate further with Mr. Porter regarding his report and failed to make the report public as promised.

37.

On or between the 19th day of July, 2010 and the 22nd day of July, 2010, APS received an Open Records Act request from the AJC for "[t]he report completed by Andrew Porter, dean of the University of Pennsylvania Graduate School of Education, concerning CRCT results." APS denied having a copy of the report because **BEVERLY HALL** claimed to have deleted the report from her computer.

38.

On or between the 1st day of August, 2010 and the 30th day of August, 2010, **MICHAEL PITTS** attended a staff meeting at Parks Middle School and told Parks' employees, including Kelli Smith, Dorothea Wilson, and others, that by admitting knowledge of cheating to GBI agents and the Governor's Special Investigators they would only get themselves in trouble.

39.

On or between February, 2005 and August, 2010, **CHRISTOPHER WALLER** engaged in conduct intended to pressure, intimidate and coerce teachers to cheat and conceal cheating at Parks Middle School each year on the CRCT. This conduct included threats, retaliation, and sexual harassment.

40.

On or between the 1st day of January, 2005 and the 31st day of December, 2010, **BEVERLY HALL** publicly misrepresented the academic performance of schools throughout APS, including but not limited to Parks Middle School.

41.

On or about the 1st day of September, 2010 and the 1st day of June, 2011, **MILLICENT FEW** received a subpoena to produce all cheating complaints to the Governor's Special Investigators. Contrary to the subpoena, **MILLICENT FEW** withheld Reginal Dukes' Parks Middle School investigative report and other responsive OIR cheating related documents.

42.

On or about the 24th day of May, 2011, after receiving a second subpoena from the Governor's Special Investigators specifically requesting the Reginal Dukes' investigative file, **MILLICENT FEW** ordered Nicole Lawson, an OIR employee, to compose a memorandum to close the 2006 Parks Middle School investigation file. **MILLICENT FEW** then edited the note to state that Reginal Dukes' finding that Parks Middle School cheated on the Georgia Eighth Grade Writing Assessment was unfounded.

43.

On or between the 26th day of April, 2004 and the 28th day of June, 2010, **BEVERLY HALL** reviewed numerous CRCT cheating investigations concerning schools throughout APS. **BEVERLY HALL** approved findings that unsubstantiated cheating in most of those investigations.

44.

On or between the 21st day of April, 2009 and the 30th day of April, 2009, during the 2009 CRCT administration, the culture at APS created by **BEVERLY HALL** was such that cheating occurred at many schools in APS, including but not limited to: Beecher Hills Elementary School, Bethune Elementary School, Coan Middle School, Woodson Elementary School, F.L. Stanton Elementary School, Fain Elementary School, Grove Park Elementary School, Hutchinson Elementary School, Jackson Elementary School, M. A. Jones Elementary School, Parkside Elementary School, Thomasville Heights Elementary School, Toomer Elementary School, and Finch Elementary School. APS employees at these schools admitted to cheating but have not been charged due to their confessions, cooperation, and truthful testimony.

COUNT 2: FALSE STATEMENTS AND WRITINGS, O.C.G.A. § 16-10-20

and the GRAND JURORS aforesaid, in the name and on behalf of the citizens of the State of Georgia, do charge and accuse **BEVERLY HALL**, with the offense of **FALSE STATEMENTS AND WRITINGS**, in violation of O.C.G.A. § 16-10-20, for the said accused, in the County of Fulton and State of Georgia, on or about the **2nd day of October, 2009**, did knowingly and willfully make and use a false document and writing, by completing and submitting a Superintendent's Test Certification to the GaDOE, knowing the same to contain false statements, to wit: that "[APS] adhered to all written regulations and procedures relating to testing and test administration, including the distribution and collection of test materials, test security, use of test results and department testing dates and the reporting of irregularities established in the Student Assessment Handbook, System and School Test Coordinator Manuals"; in a matter within the jurisdiction of APS, a political subdivision of the State of Georgia; the GaDOE and GOSA, departments or agencies of state government; contrary to the laws of said State, the good order, peace and dignity thereof;

COUNT 3: THEFT BY TAKING, O.C.G.A. § 16-8-2

and the GRAND JURORS aforesaid, in the name and on behalf of the citizens of the State of Georgia, do charge and accuse **BEVERLY HALL** with the offense of **THEFT BY TAKING**, in violation of O.C.G.A. § 16-8-2, for the said accused in the County of Fulton and State of Georgia, on or about the **18th day of December, 2009**, and while employees of a government institution in breach of their duties as government employees, did unlawfully take U.S. currency, the property of APS, with the intention of depriving said owner of said property, by causing APS to issue her a monetary bonus based on 2009 CRCT results for schools in APS which she knew were false; contrary to the laws of said State, the good order, peace and dignity thereof;

COUNT 4: INFLUENCING WITNESSES, O.C.G.A. § 16-10-93

and the GRAND JURORS aforesaid, in the name and on behalf of the citizens of the State of Georgia, do charge and accuse **TAMARA COTMAN** with the offense of **INFLUENCING WITNESSES**, in violation of O.C.G.A. 16-10-93, for the said accused, in the County of Fulton and State of Georgia, on or about the **17th day of November, 2010**, the exact date(s) being unknown to the Grand Jurors at this time, did knowingly intimidate Jimmie Hawkins, and other principals under her supervision, with the intent to hinder or delay the communication of information related to the commission of a criminal offense to GBI and other law enforcement officers investigating cheating in APS; contrary to the laws of said State, the good order, peace and dignity thereof;

COUNT 5: INFLUENCING WITNESSES, O.C.G.A. § 16-10-93

and the GRAND JURORS aforesaid, in the name and on behalf of the citizens of the State of Georgia, do charge and accuse **MICHAEL PITTS** with the offense of **INFLUENCING WITNESSES**, in violation of O.C.G.A. 16-10-93, for the said accused, in the County of Fulton and State of Georgia, on or between the **1st day of August, 2010**, and the **31st day of August, 2010**, the exact date(s) being unknown to the Grand Jurors at this time, did knowingly intimidate Dorothea Wilson, and other staff at Parks Middle School, with the intent to hinder or delay the communication of information related to the commission of a criminal offense to GBI and other law enforcement officers investigating cheating in APS; contrary to the laws of said State, the good order, peace and dignity thereof;

COUNT 6: FALSE STATEMENTS AND WRITINGS, O.C.G.A. § 16-10-20

and the GRAND JURORS aforesaid, in the name and on behalf of the citizens of the State of Georgia, do charge and accuse **SHARON DAVIS-WILLIAMS**, with the offense of **FALSE STATEMENTS AND WRITINGS**, in violation of O.C.G.A. § 16-10-20, for the said accused, in the County of Fulton and State of Georgia, on or between the **19th day of April, 2009** and the **8th day of May, 2009**, the exact dates being unknown to the Grand Jurors at this time, did knowingly and willfully conceal and cover up the material fact that during the 2009 CRCT at Perkerson Elementary School a proctor was told by students that their teacher gave them correct answers, in violation of the testing rules and regulations set forth by the GaDOE, in a matter within the jurisdiction of APS, a political subdivision of the State of Georgia; the GaDOE and GOSA, departments or agencies of state government; contrary to the laws of said State, the good order, peace and dignity thereof;

COUNT 7: FALSE STATEMENTS AND WRITINGS, O.C.G.A. § 16-10-20

and the GRAND JURORS aforesaid, in the name and on behalf of the citizens of the State of Georgia, do charge and accuse **SHARON DAVIS-WILLIAMS**, with the offense of **FALSE STATEMENTS AND WRITINGS**, in violation of O.C.G.A. § 16-10-20, for the said accused, in the County of Fulton and State of Georgia, on or between the **19th day of April, 2009** and the **8th day of May, 2009**, the exact dates being unknown to the Grand Jurors at this time, did knowingly and willfully make a false document, to wit: a standardized test feedback form, by causing a test monitor to omit his written observation that during the 2009 CRCT at Herndon Elementary School said monitor witnessed a teacher pointing out correct answers to students causing said students to change their answers from wrong to right, in violation of the testing rules and regulations set forth by the GaDOE, in a matter within the jurisdiction of APS, a political subdivision of the State of Georgia; the GaDOE and GOSA, departments or agencies of state government; contrary to the laws of said State, the good order, peace and dignity thereof;

COUNT 8: FALSE SWEARING, O.C.G.A. § 16-10-71

and the GRAND JURORS aforesaid, in the name and on behalf of the citizens of the State of Georgia, do charge and accuse **SHARON DAVIS-WILLIAMS**, with the offense of **FALSE SWEARING**, in violation of O.C.G.A. § 16-10-71, for the said accused, in the County of Fulton and State of Georgia, on or about the 3rd day of May, 2011, having been administered a lawful oath or affirmation, did knowingly and willfully make false statements to the Governor's Special Investigators, to wit:

- a. That she did not receive a testing irregularity report from Jackie Boyce;
- b. That she has not asked anybody to change information or misrepresent information; and
- d. That she reported the allegation that a teacher gave students the answers on the CRCT to the Research, Planning, and Accountability ("RPA") office;

contrary to the laws of said State, the good order, peace and dignity thereof;

PARKS MIDDLE SCHOOL

COUNT 9: FALSE STATEMENTS AND WRITINGS, O.C.G.A. § 16-10-20

and the GRAND JURORS aforesaid, in the name and on behalf of the citizens of the State of Georgia, do charge and accuse **CHRISTOPHER WALLER, GREGORY REID, SANDRA WARD, STARLETTE MITCHELL and KIMBERLY ODEN** with the offense of **FALSE STATEMENTS AND WRITINGS**, in violation of O.C.G.A. § 16-10-20, for the said accused, in the County of Fulton and State of Georgia, during the CRCT testing period, on or between the 21st day of April, 2009 and the 30th day of April, 2009, the exact date(s) being unknown to the Grand Jurors at this time, did knowingly and willfully make and use false documents and writings, knowing the same to contain false entries, by changing students' answers from wrong to right on the 2009 CRCT answer sheets for students at Parks Middle School, in a matter within the jurisdiction of APS, a political subdivision of the State of Georgia, the GaDOE and GOSA, departments or agencies of state government; contrary to the laws of said State, the good order, peace and dignity thereof;

COUNT 10: FALSE STATEMENTS AND WRITINGS, O.C.G.A. § 16-10-20

and the GRAND JURORS aforesaid, in the name and on behalf of the citizens of the State of Georgia, do charge and accuse **CHRISTOPHER WALLER** with the offense of **FALSE STATEMENTS AND WRITINGS**, in violation of O.C.G.A. § 16-10-20, for the said accused, in the County of Fulton and State of Georgia, on or about the 30th day of April, 2009, did knowingly and willfully make and use a false document and writing, knowing the same to contain false statements, by completing, signing, and submitting a CRCT School Certification Form for Parks Middle School to APS, to wit:

- (1) The written plans for testing were followed, including all directives in the *Examiner's Manual*, the *Testing Coordinator's Manual*, and system correspondence;
- (2) There was ethical behavior on the part of all staff and all students involved in the test administration; any suspected testing irregularity/circumstance has been reported to the system coordinator;

in a matter within the jurisdiction of APS, a political subdivision of the State of Georgia; the GaDOE and GOSA, departments or agencies of state government; contrary to the laws of said State, the good order, peace and dignity thereof;

COUNT 11: FALSE STATEMENTS AND WRITINGS, O.C.G.A. § 16-10-20

and the GRAND JURORS aforesaid, in the name and on behalf of the citizens of the State of Georgia, do charge and accuse **CHRISTOPHER WALLER** and **SANDRA WARD** with the offense of **FALSE STATEMENTS AND WRITINGS**, in violation of O.C.G.A. § 16-10-20, for the said accused, in the County of Fulton and State of Georgia, on or about the 28th day of April, 2010, did knowingly and willfully make and use a false document and writing, knowing the same to contain false statements, by completing, signing, and submitting a CRCT School Certification Form for Parks Middle School to APS, to wit:

- (1) The written plans for testing were followed, including all directives in the *Examiner's Manual*, the *Testing Coordinator's Manual*, and system correspondence;
- (2) There was ethical behavior on the part of all staff and all students involved in the test administration; any suspected testing irregularity/circumstance has been reported to the system coordinator;

in a matter within the jurisdiction of APS, a political subdivision of the State of Georgia; the GaDOE and GOSA, departments or agencies of state government; contrary to the laws of said State, the good order, peace and dignity thereof;

COUNT 12: FALSE STATEMENTS AND WRITINGS, O.C.G.A. § 16-10-20

and the GRAND JURORS aforesaid, in the name and on behalf of the citizens of the State of Georgia, do charge and accuse **SANDRA WARD**, with the offense of **FALSE STATEMENTS AND WRITINGS**, in violation of O.C.G.A. § 16-10-20, for the said accused, in the County of Fulton and State of Georgia, on or about the **20th day of October, 2010**, did knowingly and willfully make a false statement to a GBI agent, to wit: that she did not participate in, assist with or have knowledge of anyone erasing or changing answers on students' CRCT answer sheets, in a matter within the jurisdiction of APS, a political subdivision of the State of Georgia, the GaDOE and GOSA, departments or agencies of state government; contrary to the laws of said State, the good order, peace and dignity thereof;

COUNT 13: FALSE STATEMENTS AND WRITINGS, O.C.G.A. § 16-10-20

and the GRAND JURORS aforesaid, in the name and on behalf of the citizens of the State of Georgia, do charge and accuse **STARLETTE MITCHELL**, with the offense of **FALSE STATEMENTS AND WRITINGS**, in violation of O.C.G.A. § 16-10-20, for the said accused, in the County of Fulton and State of Georgia, on or about the **20th day of October, 2010**, did knowingly and willfully make false statements to a GBI agent, to wit: that she did not participate in, assist with or have knowledge of anyone erasing or changing answers on students' CRCT answer sheets, in a matter within the jurisdiction of APS, a political subdivision of the State of Georgia, the GaDOE and GOSA, departments or agencies of state government; contrary to the laws of said State, the good order, peace and dignity thereof;

COUNT 14: FALSE STATEMENTS AND WRITINGS, O.C.G.A. § 16-10-20

and the GRAND JURORS aforesaid, in the name and on behalf of the citizens of the State of Georgia, do charge and accuse **STARLETTE MITCHELL**, with the offense of **FALSE STATEMENTS AND WRITINGS**, in violation of O.C.G.A. § 16-10-20, for the said accused, in the County of Fulton and State of Georgia, on or about the **15th day of December, 2010**, did knowingly and willfully make a false statement to a GBI agent, to wit: that she only participated in erasing and changing answers on students' CRCT answer sheets in 2009; in a matter within the jurisdiction of APS, a political subdivision of the State of Georgia, the GaDOE and GOSA, departments or agencies of state government; contrary to the laws of said State, the good order, peace and dignity thereof;

COUNT 15: FALSE STATEMENTS AND WRITINGS, O.C.G.A. § 16-10-20

and the GRAND JURORS aforesaid, in the name and on behalf of the citizens of the State of Georgia, do charge and accuse **GREGORY REID** with the offense of **FALSE STATEMENTS AND WRITINGS**, in violation of O.C.G.A. § 16-10-20, for the said accused, in the County of Fulton and State of Georgia, on or about the **20th day of October, 2010**, did knowingly and willfully make a false statement to a GBI agent, to wit: that he did not participate in, assist with or have knowledge of anyone erasing or changing answers on students' CRCT answer sheets; in a matter within the jurisdiction of APS, a political subdivision of the State of Georgia, the GaDOE and GOSA, departments or agencies of state government; contrary to the laws of said State, the good order, peace and dignity thereof;

COUNT 16: FALSE SWEARING, O.C.G.A. § 16-10-71

and the GRAND JURORS aforesaid, in the name and on behalf of the citizens of the State of Georgia, do charge and accuse **CHRISTOPHER WALLER**, with the offense of **FALSE SWEARING**, in violation of O.C.G.A. § 16-10-71, for the said accused, in the County of Fulton and State of Georgia, on or about the **18th day of April, 2011**, having been administered a lawful oath or affirmation, did knowingly and willfully make false statements to the Governor's Special Investigators, to wit:

- a. That he was not aware of any improprieties whatsoever with respect to how CRCT testing was conducted at Parks Middle School;
- b. That he was not aware of any adult changing answers on students' CRCT answer sheets;
- c. That he did not have any knowledge of teachers at Parks Middle School keeping tests later than they should have;

contrary to the laws of said State, the good order, peace and dignity thereof;

COUNT 17: FALSE SWEARING, O.C.G.A. § 16-10-71

and the GRAND JURORS aforesaid, in the name and on behalf of the citizens of the State of Georgia, do charge and accuse **GREGORY REID**, with the offense of **FALSE SWEARING**, in violation of O.C.G.A. § 16-10-71, for the said accused, in the County of Fulton and State of Georgia, on or about the **18th day of April, 2011**, having been administered a lawful oath or affirmation, did knowingly and willfully make false statements to the Governor's Special Investigators, to wit:

- a. That he was not aware teachers were cheating on the CRCT at Parks Middle School;
- b. That he did not suggest or direct teachers to cheat;
- c. That he did not have any knowledge of teachers at Parks Middle School keeping tests later than they should have;

contrary to the laws of said State, the good order, peace and dignity thereof;

COUNT 18: FALSE SWEARING, O.C.G.A. § 16-10-71

and the GRAND JURORS aforesaid, in the name and on behalf of the citizens of the State of Georgia, do charge and accuse **BEVERLY HALL**, with the offense of **FALSE SWEARING**, in violation of O.C.G.A. § 16-10-71, for the said accused, in the County of Fulton and State of Georgia, on or about the **18th day of May, 2011**, having been administered a lawful oath or affirmation, did knowingly and willfully make false statements to the Governor's Special Investigators, to wit:

- a. That she never received complaints about Parks Middle School or **CHRISTOPHER WALLER** after he became principal;
- b. That she never met with Reginal Dukes in connection with his investigation into complaints about **CHRISTOPHER WALLER** at Parks Middle School;

contrary to the laws of said State, the good order, peace and dignity thereof;

COUNT 19: FALSE SWEARING, O.C.G.A. § 16-10-71

and the GRAND JURORS aforesaid, in the name and on behalf of the citizens of the State of Georgia, do charge and accuse **MILLICENT FEW**, with the offense of **FALSE SWEARING**, in violation of O.C.G.A. § 16-10-71, for the said accused, in the County of Fulton and State of Georgia, on or about the **1st day of June, 2011**, having been administered a lawful oath or affirmation, did knowingly and willfully make false statements to the Governor's Special Investigators, to wit to wit:

- a. That she never ordered the destruction of early drafts of the Deerwood investigation completed by outside investigator Penn Payne;
- b. That she did not meet with Reginal Dukes in connection with his investigation into complaints about **CHRISTOPHER WALLER** at Parks Middle School;

contrary to the laws of said State, the good order, peace and dignity thereof;

GIDEONS ELEMENTARY SCHOOL

COUNT 20: FALSE STATEMENTS AND WRITINGS, O.C.G.A. § 16-10-20

and the GRAND JURORS aforesaid, in the name and on behalf of the citizens of the State of Georgia, do charge and accuse **ARMSTEAD SALTERS** and **SHERIDAN ROGERS** with the offense of **FALSE STATEMENTS AND WRITINGS**, in violation of O.C.G.A. § 16-10-20, for the said accused, in the County of Fulton and State of Georgia, during the CRCT testing period, on or between the **21st day of April, 2009** and the **30th day of April, 2009**, the exact date(s) being unknown to the Grand Jurors at this time, did knowingly and willfully make and use false documents and writings, knowing the same to contain false entries, by changing students' answers from wrong to right on the 2009 CRCT answer sheets for students at Gideons Elementary School in a matter within the jurisdiction of APS, a political subdivision of the State of Georgia; the GaDOE and GOSA, departments or agencies of state government; contrary to the laws of said State, the good order, peace and dignity thereof;

COUNT 21: FALSE STATEMENTS AND WRITINGS, O.C.G.A. § 16-10-20

and the GRAND JURORS aforesaid, in the name and on behalf of the citizens of the State of Georgia, do charge and accuse **ARMSTEAD SALTERS** and **SHERIDAN ROGERS** with the offense of **FALSE STATEMENTS AND WRITINGS**, in violation of O.C.G.A. § 16-10-20, for the said accused, in the County of Fulton and State of Georgia, on or about the 4th day of May, 2009, did knowingly and willfully make and use a false document and writing, knowing the same to contain false statements, by completing, signing, and submitting a CRCT School Certification Form for Gideons Elementary School to APS, to wit:

- (1) The written plans for testing were followed, including all directives in the *Examiner's Manual*, the *Testing Coordinator's Manual*, and system correspondence;
- (2) There was ethical behavior on the part of all staff and all students involved in the test administration; any suspected testing irregularity/circumstance has been reported to the system coordinator;

in a matter within the jurisdiction of APS, a political subdivision of the State of Georgia, the GaDOE and GOSA, departments or agencies of state government; contrary to the laws of said State, the good order, peace and dignity thereof;

COUNT 22: FALSE STATEMENTS AND WRITINGS, O.C.G.A. § 16-10-20

and the GRAND JURORS aforesaid, in the name and on behalf of the citizens of the State of Georgia, do charge and accuse **SHERIDAN ROGERS** with the offense of **FALSE STATEMENTS AND WRITINGS**, in violation of O.C.G.A. § 16-10-20, for the said accused, in the County of Fulton and State of Georgia, on or about the 21st day of October, 2010, did knowingly and willfully make false statements to a GBI agent, to wit:

- a. That she did not return CRCT booklets to teachers so they could change answers;
- b. That she did not instruct teachers to change answers on CRCT answer sheets; and
- c. That she was not present while other teachers changed students' answers on the CRCT answer sheets;

in a matter within the jurisdiction of APS, a political subdivision of the State of Georgia, the GaDOE and GOSA, departments or agencies of state government; contrary to the laws of said State, the good order, peace and dignity thereof;

COUNT 23: INFLUENCING WITNESSES, O.C.G.A. § 16-10-93

and the GRAND JURORS aforesaid, in the name and on behalf of the citizens of the State of Georgia, do charge and accuse **ARMSTEAD SALTERS** with the offense of **INFLUENCING WITNESSES**, in violation of O.C.G.A. 16-10-93, for the said accused, in the County of Fulton and State of Georgia, on or between the **30th day of June, 2010** and the **17th day of November, 2010**, the exact date(s) being unknown to the Grand Jurors at this time, did knowingly intimidate Oliver Banks, Jr., and other Gideons Elementary School employees, with the intent to hinder or delay the communication of information related to the commission of a criminal offense to GBI and other law enforcement officers investigating cheating in APS; contrary to the laws of said State, the good order, peace and dignity thereof;

DOBBS ELEMENTARY SCHOOL

COUNT 24: FALSE STATEMENTS AND WRITINGS, O.C.G.A. § 16-10-20

and the GRAND JURORS aforesaid, in the name and on behalf of the citizens of the State of Georgia, do charge and accuse **DANA EVANS, ANGELA WILLIAMSON, DERRICK BROADWATER** and **SHAYLA SMITH** with the offense of **FALSE STATEMENTS AND WRITINGS**, in violation of O.C.G.A. § 16-10-20, for the said accused, in the County of Fulton and State of Georgia, during the CRCT testing period, on or between the **21st day of April, 2009** and the **30th day of April, 2009**, the exact date(s) being unknown to the Grand Jurors at this time, did knowingly and willfully make and use false documents and writings, knowing the same to contain false entries, by giving students correct answers to the 2009 CRCT, thereby causing them to falsify their 2009 CRCT answers sheets at Dobbs Elementary School, in a matter within the jurisdiction of APS, a political subdivision of the State of Georgia, the GaDOE and GOSA, departments or agencies of state government; contrary to the laws of said State, the good order, peace and dignity thereof;

COUNT 25: FALSE STATEMENTS AND WRITINGS, O.C.G.A. § 16-10-20

and the GRAND JURORS aforesaid, in the name and on behalf of the citizens of the State of Georgia, do charge and accuse **DANA EVANS** with the offense of **FALSE STATEMENTS AND WRITINGS**, in violation of O.C.G.A. § 16-10-20, for the said accused, in the County of Fulton and State of Georgia, on or about the **30th day of April, 2009**, did knowingly and willfully make and use a false document and writing, knowing the same to contain false statements, by completing, signing, and submitting a CRCT School Certification Form for Dobbs Elementary School to APS, to wit:

- (1) The written plans for testing were followed, including all directives in the *Examiner's Manual*, the *Testing Coordinator's Manual*, and system correspondence;
- (2) There was ethical behavior on the part of all staff and all students involved in the test administration; any suspected testing irregularity/circumstance has been reported to the system coordinator;

in a matter within the jurisdiction of APS, a political subdivision of the State of Georgia, the GaDOE and GOSA, departments or agencies of state government; contrary to the laws of said State, the good order, peace and dignity thereof;

COUNT 26: FALSE STATEMENTS AND WRITINGS, O.C.G.A. § 16-10-20

and the GRAND JURORS aforesaid, in the name and on behalf of the citizens of the State of Georgia, do charge and accuse **DERRICK BROADWATER** and **SHAYLA SMITH** with the offense of **FALSE STATEMENTS AND WRITINGS**, in violation of O.C.G.A. § 16-10-20, for the said accused, in the County of Fulton and State of Georgia, during the CRCT testing period, on or between the **20th day of April, 2010** and the **30th day of April, 2010**, the exact date(s) being unknown to the Grand Jurors at this time, did knowingly and willfully make and use false documents and writings, knowing the same to contain false entries, by giving students correct answers to the 2010 CRCT, thereby causing them to falsify their 2010 CRCT answers sheets at Dobbs Elementary School, in a matter within the jurisdiction of APS, a political subdivision of the State of Georgia, the GaDOE and GOSA, departments or agencies of state government; contrary to the laws of said State, the good order, peace and dignity thereof;

COUNT 27: FALSE STATEMENTS AND WRITINGS, O.C.G.A. § 16-10-20

and the GRAND JURORS aforesaid, in the name and on behalf of the citizens of the State of Georgia, do charge and accuse **DESSA CURB** with the offense of **FALSE STATEMENTS AND WRITINGS**, in violation of O.C.G.A. § 16-10-20, for the said accused, in the County of Fulton and State of Georgia, during the CRCT testing period, on or between the **21st day of April, 2009** and the **30th day of April, 2009**, the exact date(s) being unknown to the Grand Jurors at this time, did knowingly and willfully make and use false documents and writings, knowing the same to contain false entries, by changing students' answers from wrong to right on the 2009 CRCT answer sheets for students at Dobbs Elementary School in a matter within the jurisdiction of APS, a political subdivision of the State of Georgia; the GaDOE and GOSA, departments or agencies of state government; contrary to the laws of said State, the good order, peace and dignity thereof;

COUNT 28: FALSE STATEMENTS AND WRITINGS, O.C.G.A. § 16-10-20

and the GRAND JURORS aforesaid, in the name and on behalf of the citizens of the State of Georgia, do charge and accuse **DANA EVANS** with the offense of **FALSE STATEMENTS AND WRITINGS**, in violation of O.C.G.A. § 16-10-20, for the said accused, in the County of Fulton and State of Georgia, on or about the **29th day of April, 2010**, did knowingly and willfully make and use a false document and writing, knowing the same to contain false statements, by completing, signing, and submitting a CRCT School Certification Form for Dobbs Elementary School to APS, to wit:

- (1) The written plans for testing were followed, including all directives in the *Examiner's Manual*, the *Testing Coordinator's Manual*, and system correspondence;
- (2) There was ethical behavior on the part of all staff and all students involved in the test administration; any suspected testing irregularity/circumstance has been reported to the system coordinator;

in a matter within the jurisdiction of APS, a political subdivision of the State of Georgia, the GaDOE and GOSA, departments or agencies of state government; contrary to the laws of said State, the good order, peace and dignity thereof;

COUNT 29: FALSE STATEMENTS AND WRITINGS, O.C.G.A. § 16-10-20

and the GRAND JURORS aforesaid, in the name and on behalf of the citizens of the State of Georgia, do charge and accuse **DERRICK BROADWATER** with the offense of **FALSE STATEMENTS AND WRITINGS**, in violation of O.C.G.A. § 16-10-20, for the said accused, in the County of Fulton and State of Georgia, on or about the **8th day of February, 2011**, did knowingly and willfully make false statements to a GBI agent, to wit: that he did not participate in, assist with or have knowledge of anyone giving students answers during the CRCT; in a matter within the jurisdiction of APS, a political subdivision of the State of Georgia, the GaDOE and GOSA, departments or agencies of state government; contrary to the laws of said State, the good order, peace and dignity thereof;

COUNT 30: FALSE STATEMENTS AND WRITINGS, O.C.G.A. § 16-10-20

and the GRAND JURORS aforesaid, in the name and on behalf of the citizens of the State of Georgia, do charge and accuse **DESSA CURB** with the offense of **FALSE STATEMENTS AND WRITINGS**, in violation of O.C.G.A. § 16-10-20, for the said accused, in the County of Fulton and State of Georgia, on or about the **21st day of February, 2011**, did knowingly and willfully make false statements to a GBI agent, to wit: that she did not participate in, assist with or have knowledge of anyone giving students answers during the CRCT; in a matter within the jurisdiction of APS, a political subdivision of the State of Georgia, the GaDOE and GOSA, departments or agencies of state government; contrary to the laws of said State, the good order, peace and dignity thereof;

COUNT 31: FALSE STATEMENTS AND WRITINGS, O.C.G.A. § 16-10-20

and the GRAND JURORS aforesaid, in the name and on behalf of the citizens of the State of Georgia, do charge and accuse **DANA EVANS** with the offense of **FALSE STATEMENTS AND WRITINGS**, in violation of O.C.G.A. § 16-10-20, for the said accused, in the County of Fulton and State of Georgia, on or about the **27th day of February, 2011**, did knowingly and willfully make false statements to a GBI agent, to wit:

- a. That she did not hear anything about cheating at Dobbs Elementary School;
- b. That she did not allow teachers to cheat at Dobbs Elementary School;

in a matter within the jurisdiction of APS, a political subdivision of the State of Georgia, the GaDOE and GOSA, departments or agencies of state government; contrary to the laws of said State, the good order, peace and dignity thereof;

COUNT 32: FALSE STATEMENTS AND WRITINGS, O.C.G.A. § 16-10-20

and the GRAND JURORS aforesaid, in the name and on behalf of the citizens of the State of Georgia, do charge and accuse **ANGELA WILLIAMSON** with the offense of **FALSE STATEMENTS AND WRITINGS**, in violation of O.C.G.A. § 16-10-20, for the said accused, in the County of Fulton and State of Georgia, on or about the **1st day of March, 2011**, did knowingly and willfully make false statements to a GBI agent, to wit: that she did not participate in, assist with or have knowledge of anyone giving students answers during the CRCT; in a matter within the jurisdiction of APS, a political subdivision of the State of Georgia, the GaDOE and GOSA, departments or agencies of state government; contrary to the laws of said State, the good order, peace and dignity thereof;

COUNT 33: FALSE SWEARING, O.C.G.A. § 16-10-71

and the GRAND JURORS aforesaid, in the name and on behalf of the citizens of the State of Georgia, do charge and accuse **ANGELA WILLIAMSON**, with the offense of **FALSE SWEARING**, in violation of O.C.G.A. § 16-10-71, for the said accused, in the County of Fulton and State of Georgia, on or about the **9th day of June, 2012**, having been administered a lawful oath by a hearing officer authorized to conduct Fair Dismissal Act hearings pursuant to O.C.G.A. § 20-4-940, did knowingly, willfully, and falsely swear that she did not give students answers to the CRCT at Dobbs Elementary School; contrary to the laws of said State, the good order, peace and dignity thereof;

COUNT 34: FALSE SWEARING, O.C.G.A. § 16-10-71

and the GRAND JURORS aforesaid, in the name and on behalf of the citizens of the State of Georgia, do charge and accuse **DERRICK BROADWATER**, with the offense of **FALSE SWEARING**, in violation of O.C.G.A. § 16-10-71, for the said accused, in the County of Fulton and State of Georgia, on or about the **25th day of April, 2012**, having been administered a lawful oath by a hearing officer authorized to conduct Fair Dismissal Act hearings pursuant to O.C.G.A. § 20-4-940, did knowingly, willfully, and falsely swear:

- a. That he did not cheat on the CRCT at Dobbs Elementary School;
- b. That he did not give students answers on the CRCT;
- c. That he did not encourage students to erase and change their answers on the CRCT;

contrary to the laws of said State, the good order, peace and dignity thereof;

COUNT 35: FALSE SWEARING, O.C.G.A. § 16-10-71

and the GRAND JURORS aforesaid, in the name and on behalf of the citizens of the State of Georgia, do charge and accuse **SHAYLA SMITH**, with the offense of **FALSE SWEARING**, in violation of O.C.G.A. § 16-10-71, for the said accused, in the County of Fulton and State of Georgia, on or about the **27th day of August, 2012**, having been administered a lawful oath by a hearing officer authorized to conduct Fair Dismissal Act hearings pursuant to O.C.G.A. § 20-4-940, did knowingly, willfully, and falsely swear that she never gave any students answers on any CRCT; contrary to the laws of said State, the good order, peace and dignity thereof;

COUNT 36: FALSE SWEARING, O.C.G.A. § 16-10-71

and the GRAND JURORS aforesaid, in the name and on behalf of the citizens of the State of Georgia, do charge and accuse **ANGELA WILLIAMSON**, with the offense of **FALSE SWEARING**, in violation of O.C.G.A. § 16-10-71, for the said accused, in the County of Fulton and State of Georgia, on or about the **1st day of December, 2012**, having been administered a lawful oath by a hearing officer authorized to conduct Fair Dismissal Act hearings pursuant to O.C.G.A. § 20-4-940, did knowingly, willfully, and falsely swear:

- a. That she did not prompt or give students correct answers to the CRCT at Dobbs Elementary School;
- b. That she did not cheat at any point on the 2009 CRCT at Dobbs Elementary School;

contrary to the laws of said State, the good order, peace and dignity thereof;

DUNBAR ELEMENTARY SCHOOL

COUNT 37: FALSE STATEMENTS AND WRITINGS, O.C.G.A. § 16-10-20

and the GRAND JURORS aforesaid, in the name and on behalf of the citizens of the State of Georgia, do charge and accuse **LERA MIDDLEBROOKS, SHANI ROBINSON, PAMELA CLEVELAND** and **DIANE BUCKNER WEBB**, with the offense of **FALSE STATEMENTS AND WRITINGS**, in violation of O.C.G.A. § 16-10-20, for the said accused, in the County of Fulton and State of Georgia, during the CRCT testing period, on or between the **21st day of April, 2009** and the **30th day of April, 2009**, the exact date(s) being unknown to the Grand Jurors at this time, did knowingly and willfully make and use false documents and writings, knowing the same to contain false entries, by changing students' answers from wrong to right on the 2009 CRCT answer sheets for students at Dunbar Elementary School; in a matter within the jurisdiction of APS, a political subdivision of the State of Georgia, the Georgia Department of Education and GOSA, departments or agencies of state government; contrary to the laws of said State, the good order, peace and dignity thereof;

COUNT 38: FALSE STATEMENTS AND WRITINGS, O.C.G.A. § 16-10-20

and the GRAND JURORS aforesaid, in the name and on behalf of the citizens of the State of Georgia, do charge and accuse **GLORIA IVEY** with the offense of **FALSE STATEMENTS AND WRITINGS**, in violation of O.C.G.A. § 16-10-20, for the said accused, in the County of Fulton and State of Georgia, during the CRCT testing period, on or between the **21st day of April, 2009** and the **30th day of April, 2009**, the exact date(s) being unknown to the Grand Jurors at this time, did knowingly and willfully make and use false documents and writings, knowing the same to contain false entries, by giving students correct answers to the 2009 CRCT, thereby causing them to falsify their 2009 CRCT answers sheets at Dunbar Elementary School; in a matter within the jurisdiction of APS, a political subdivision of the State of Georgia; the GaDOE and GOSA, departments or agencies of state government; contrary to the laws of said State, the good order, peace and dignity thereof;

COUNT 39: FALSE STATEMENTS AND WRITINGS, O.C.G.A. § 16-10-20

and the GRAND JURORS aforesaid, in the name and on behalf of the citizens of the State of Georgia, do charge and accuse **LERA MIDDLEBROOKS** with the offense of **FALSE STATEMENTS AND WRITINGS**, in violation of O.C.G.A. § 16-10-20, for the said accused, in the County of Fulton and State of Georgia, on or about the **4th day of May, 2009**, did knowingly and willfully make and use a false document and writing, knowing the same to contain false statements, by completing, signing, and submitting a CRCT School Certification Form for Dunbar Elementary School to APS, to wit:

- (1) The written plans for testing were followed, including all directives in the *Examiner's Manual*, the *Testing Coordinator's Manual*, and system correspondence;
- (2) There was ethical behavior on the part of all staff and all students involved in the test administration; any suspected testing irregularity/circumstance has been reported to the system coordinator;

in a matter within the jurisdiction of APS, a political subdivision of the State of Georgia, the GaDOE and GOSA, departments or agencies of state government; contrary to the laws of said State, the good order, peace and dignity thereof;

COUNT 40: INFLUENCING WITNESSES, O.C.G.A. § 16-10-93

and the GRAND JURORS aforesaid, in the name and on behalf of the citizens of the State of Georgia, do charge and accuse **LERA MIDDLEBROOKS** with the offense of **INFLUENCING WITNESSES**, in violation of O.C.G.A. 16-10-93, for the said accused, in the County of Fulton and State of Georgia, on or about the **11th day of April, 2011**, the exact date(s) being unknown to the Grand Jurors at this time, did knowingly intimidate Rose Neal, with the intent to hinder or delay the communication of information related to the commission of a criminal offense to GBI and other law enforcement officers investigating cheating in APS; contrary to the laws of said State, the good order, peace and dignity thereof;

COUNT 41: FALSE STATEMENTS AND WRITINGS, O.C.G.A. § 16-10-20

and the GRAND JURORS aforesaid, in the name and on behalf of the citizens of the State of Georgia, do charge and accuse **GLORIA IVEY** with the offense of **FALSE STATEMENTS AND WRITINGS**, in violation of O.C.G.A. § 16-10-20, for the said accused, in the County of Fulton and State of Georgia, on or about the **18th day of October, 2010**, did knowingly and willfully make a false statement to a GBI agent, to wit: that she did not participate in, assist with or have knowledge of anyone giving students answers to the CRCT; in a matter within the jurisdiction of APS, being a political subdivision of the State of Georgia, the GaDOE and GOSA, departments or agencies of state government; contrary to the laws of said State, the good order, peace and dignity thereof;

COUNT 42: FALSE STATEMENTS AND WRITINGS, O.C.G.A. § 16-10-20

and the GRAND JURORS aforesaid, in the name and on behalf of the citizens of the State of Georgia, do charge and accuse **DIANE WEBB BUCKNER** with the offense of **FALSE STATEMENTS AND WRITINGS**, in violation of O.C.G.A. § 16-10-20, for the said accused, in the County of Fulton and State of Georgia, on or about the **19th day of October, 2010**, did knowingly and willfully make false statements to a GBI agent, to wit: that she did not participate in, assist with or have knowledge of anyone erasing or changing answers on students' CRCT answer sheets; in a matter within the jurisdiction of APS, a political subdivision of the State of Georgia, the GaDOE, GOSA, and the GBI, departments or agencies of state government; contrary to the laws of said State, the good order, peace and dignity thereof;

COUNT 43: FALSE STATEMENTS AND WRITINGS, O.C.G.A. § 16-10-20

and the GRAND JURORS aforesaid, in the name and on behalf of the citizens of the State of Georgia, do charge and accuse **PAMELA CLEVELAND** with the offense of **FALSE STATEMENTS AND WRITINGS**, in violation of O.C.G.A. § 16-10-20, for the said accused, in the County of Fulton and State of Georgia, on or about the **19th day of October, 2010**, did knowingly and willfully make false statements to a GBI agent, to wit: that she did not participate in, assist with or have knowledge of anyone erasing or changing answers on students' CRCT answer sheets; in a matter within the jurisdiction of APS, a political subdivision of the State of Georgia, the GaDOE and GOSA, departments or agencies of state government; contrary to the laws of said State, the good order, peace and dignity thereof;

HUMPHRIES ELEMENTARY SCHOOL

COUNT 44: FALSE STATEMENTS AND WRITINGS, O.C.G.A. § 16-10-20

and the GRAND JURORS aforesaid, in the name and on behalf of the citizens of the State of Georgia, do charge and accuse **LISA TERRY, INGRID ABELLA-SLY** and **WENDY AHMED** with the offense of **FALSE STATEMENTS AND WRITINGS**, in violation of O.C.G.A. § 16-10-20, for the said accused, in the County of Fulton and State of Georgia, during the CRCT testing period, on or between the **21st day of April, 2009** and the **30th day of April, 2009**, the exact date(s) being unknown to the Grand Jurors at this time, did knowingly and willfully make and use false documents and writings, knowing the same to contain false entries, by giving students correct answers to the 2009 CRCT, thereby causing them to falsify their 2009 CRCT answers sheets at Humphries Elementary School; in a matter within the jurisdiction of APS, a political subdivision of the State of Georgia, the GaDOE, and GOSA, departments or agencies of state government; contrary to the laws of said State, the good order, peace and dignity thereof;

COUNT 45: THEFT BY TAKING, O.C.G.A. § 16-8-2

and the GRAND JURORS aforesaid, in the name and on behalf of the citizens of the State of Georgia, do charge and accuse **LISA TERRY, INGRID ABELLA-SLY** and **WENDY AHMED** with the offense of **THEFT BY TAKING**, in violation of O.C.G.A. § 16-8-2, for the said accused in the County of Fulton and State of Georgia, on or about the **18th day of December, 2009**, and while employees of a government institution in breach of their duties as government employees, did unlawfully take U.S. currency, the property of APS, with the intention of depriving said owner of said property, by causing APS to issue each of the accused a bonus check based on falsified test results on the 2009 CRCT for Humphries Elementary School; contrary to the laws of said State, the good order, peace and dignity thereof;

COUNT 46: FALSE STATEMENTS AND WRITINGS, O.C.G.A. § 16-10-20

and the GRAND JURORS aforesaid, in the name and on behalf of the citizens of the State of Georgia, do charge and accuse **INGRID ABELLA-SLY** with the offense of **FALSE STATEMENTS AND WRITINGS**, in violation of O.C.G.A. § 16-10-20, for the said accused, in the County of Fulton and State of Georgia, on or about the **27th day of October, 2010**, did knowingly and willfully make a false statement to a GBI agent, to wit: that she did not participate in, assist with or have knowledge of anyone giving students answers to the CRCT; in a matter within the jurisdiction of APS, a political subdivision of the State of Georgia, the GaDOE and GOSA, departments or agencies of state government; contrary to the laws of said State, the good order, peace and dignity thereof;

COUNT 47: FALSE STATEMENTS AND WRITINGS, O.C.G.A. § 16-10-20

and the GRAND JURORS aforesaid, in the name and on behalf of the citizens of the State of Georgia, do charge and accuse **WENDY AHMED** with the offense of **FALSE STATEMENTS AND WRITINGS**, in violation of O.C.G.A. § 16-10-20, for the said accused, in the County of Fulton and State of Georgia, on or about the **27th day of October, 2010**, did knowingly and willfully make a false statement to a GBI agent, to wit: that she did not participate in, assist with or have knowledge of anyone giving students answers to the CRCT; in a matter within the jurisdiction of APS, a political subdivision of the State of Georgia, the GaDOE and GOSA, departments or agencies of state government; contrary to the laws of said State, the good order, peace and dignity thereof;

KENNEDY MIDDLE SCHOOL

COUNT 48: FALSE STATEMENTS AND WRITINGS, O.C.G.A. § 16-10-20

and the GRAND JURORS aforesaid, in the name and on behalf of the citizens of the State of Georgia, do charge and accuse **LUCIOUS BROWN, CAROL DENNIS and TAMEKA GOODSON** with the offense of **FALSE STATEMENTS AND WRITINGS**, in violation of O.C.G.A. § 16-10-20, for the said accused, in the County of Fulton and State of Georgia, during the CRCT testing period, on or between the **21st day of April, 2009** and the **30th day of April, 2009**, the exact date(s) being unknown to the Grand Jurors at this time, did knowingly and willfully make and use false documents and writings, knowing the same to contain false entries, by changing students' answers from wrong to right on the 2009 CRCT answer sheets for students at Kennedy Middle School; in a matter within the jurisdiction of APS, a political subdivision of the State of Georgia, the GaDOE and GOSA, departments or agencies of state government; contrary to the laws of said State, the good order, peace and dignity thereof;

COUNT 49: FALSE STATEMENTS AND WRITINGS, O.C.G.A. § 16-10-20

and the GRAND JURORS aforesaid, in the name and on behalf of the citizens of the State of Georgia, do charge and accuse **LUCIOUS BROWN** with the offense of **FALSE STATEMENTS AND WRITINGS**, in violation of O.C.G.A. § 16-10-20, for the said accused, in the County of Fulton and State of Georgia, on or about the **30th day of April, 2009**, did knowingly and willfully make and use a false document and writing, knowing the same to contain false statements, by completing, signing, and submitting a CRCT School Certification Form for Kennedy Middle School to APS, to wit:

- (1) The written plans for testing were followed, including all directives in the *Examiner's Manual*, the *Testing Coordinator's Manual*, and system correspondence; and
- (2) There was ethical behavior on the part of all staff and all students involved in the test administration; any suspected testing irregularity/circumstance has been reported to the system coordinator;

in a matter within the jurisdiction of APS, a political subdivision of the State of Georgia, the GaDOE and GOSA, departments or agencies of state government; contrary to the laws of said State, the good order, peace and dignity thereof;

DEERWOOD ACADEMY

COUNT 50: FALSE STATEMENTS AND WRITINGS, O.C.G.A. § 16-10-20

and the GRAND JURORS aforesaid, in the name and on behalf of the citizens of the State of Georgia, do charge and accuse **TABEEKA JORDAN** with the offense of **FALSE STATEMENTS AND WRITINGS**, in violation of O.C.G.A. § 16-10-20, for the said accused, in the County of Fulton and State of Georgia, during the CRCT testing period, on or between the **21st day of April, 2009** and the **30th day of April, 2009**, the exact date(s) being unknown to the Grand Jurors at this time, did knowingly and willfully make and use false documents and writings, knowing the same to contain false entries, by erasing and changing students' answers from wrong to right on the 2009 CRCT answer sheets for students at Deerwood Academy; in a matter within the jurisdiction of APS, a political subdivision of the State of Georgia, the GaDOE and GOSA, departments or agencies of state government; contrary to the laws of said State, the good order, peace and dignity thereof;

COUNT 51: THEFT BY TAKING, O.C.G.A. § 16-8-2

and the GRAND JURORS aforesaid, in the name and on behalf of the citizens of the State of Georgia, do charge and accuse **TABEEKA JORDAN** with the offense of **THEFT BY TAKING**, in violation of O.C.G.A. § 16-8-2, for the said accused in the County of Fulton and State of Georgia, on or about the 18th day of December, 2009, and while an employees of a government institution in breach of her duties as government employees, did unlawfully take U.S. currency, the property of APS, with the intention of depriving said owner of said property by causing APS to issue the accused a bonus check based on falsified test results on the 2009 CRCT for Deerwood Academy; contrary to the laws of said State, the good order, peace and dignity thereof;

VENETIAN HILLS ELEMENTARY SCHOOL

COUNT 52: FALSE STATEMENTS AND WRITINGS, O.C.G.A. § 16-10-20

and the GRAND JURORS aforesaid, in the name and on behalf of the citizens of the State of Georgia, do charge and accuse **CLARIETTA DAVIS** with the offense of **FALSE STATEMENTS AND WRITINGS**, in violation of O.C.G.A. § 16-10-20, for the said accused, in the County of Fulton and State of Georgia, during the CRCT testing period on or between the 21st day of April, 2009 and the 30th day of April, 2009, the exact date(s) being unknown to the Grand Jurors at this time, did knowingly and willfully make and use false documents and writings, knowing the same to contain false entries, by erasing and changing students' answers from wrong to right on the 2009 CRCT answer sheets for students at Venetian Hills Elementary School; in a matter within the jurisdiction of APS, a political subdivision of the State of Georgia; the GaDOE and GOSA, departments or agencies of state government; contrary to the laws of said State, the good order, peace and dignity thereof;

COUNT 53: FALSE STATEMENTS AND WRITINGS, O.C.G.A. § 16-10-20

and the GRAND JURORS aforesaid, in the name and on behalf of the citizens of the State of Georgia, do charge and accuse **CLARIETTA DAVIS** with the offense of **FALSE STATEMENTS AND WRITINGS**, in violation of O.C.G.A. § 16-10-20, for the said accused, in the County of Fulton and State of Georgia, on or about the **30th day of April, 2009**, did knowingly and willfully make and use a false document and writing, knowing the same to contain false statements, by completing, signing, and submitting a CRCT School Certification Form for Venetian Hills Elementary School to APS, to wit:

- (1) The written plans for testing were followed, including all directives in the *Examiner's Manual*, the *Testing Coordinator's Manual*, and system correspondence; and
- (2) There was ethical behavior on the part of all staff and all students involved in the test administration; any suspected testing irregularity/circumstance has been reported to the system coordinator;

in a matter within the jurisdiction of APS, a political subdivision of the State of Georgia, the GaDOE and GOSA, departments or agencies of state government; contrary to the laws of said State, the good order, peace and dignity thereof;

COUNT 54: THEFT BY TAKING, O.C.G.A. § 16-8-2

and the GRAND JURORS aforesaid, in the name and on behalf of the citizens of the State of Georgia, do charge and accuse **CLARIETTA DAVIS** with the offense of **THEFT BY TAKING**, in violation of O.C.G.A. § 16-8-2, for the said accused in the County of Fulton and State of Georgia, on or about the **18th day of December, 2009**, and while an employee of a government institution in breach of her duties as a government employee, did unlawfully take U.S. currency, the property of APS, with the intention of depriving said owner of said property by causing APS to issue the accused a bonus check based on falsified test results on the 2009 CRCT for Venetian Hills Elementary School, contrary to the laws of said State, the good order, peace and dignity thereof;

USHER/COLLIER HEIGHTS ELEMENTARY SCHOOL

COUNT 55: FALSE STATEMENTS AND WRITINGS, O.C.G.A. § 16-10-20

and the GRAND JURORS aforesaid, in the name and on behalf of the citizens of the State of Georgia, do charge and accuse **DONALD BULLOCK** with the offense of **FALSE STATEMENTS AND WRITINGS**, in violation of O.C.G.A. § 16-10-20, for the said accused, in the County of Fulton and State of Georgia, during the CRCT testing period, on or between the **21st day of April, 2009** and the **30th day of April, 2009**, the exact date(s) being unknown to the Grand Jurors at this time, did knowingly and willfully make and use false documents and writings, knowing the same to contain false entries, by erasing and changing students' answers from wrong to right on the 2009 CRCT answer sheets for students at Usher/Collier Heights Elementary School; in a matter within the jurisdiction of APS, a political subdivision of the State of Georgia, the GaDOE, and GOSA, departments or agencies of state government, contrary to the laws of said State, the good order, peace and dignity thereof;

COUNT 56: FALSE STATEMENTS AND WRITINGS, O.C.G.A. § 16-10-20

and the GRAND JURORS aforesaid, in the name and on behalf of the citizens of the State of Georgia, do charge and accuse **DONALD BULLOCK** with the offense of **FALSE STATEMENTS AND WRITINGS**, in violation of O.C.G.A. § 16-10-20, for the said accused, in the County of Fulton and State of Georgia, on or between the **28th day of April, 2009** and the **4th day of May, 2009**, did knowingly and willfully make and use a false document and writing, knowing the same to contain false statements, by completing, signing, and submitting a CRCT School Certification Form for Usher/Collier Heights Elementary School to APS, to wit:

- (1) The written plans for testing were followed, including all directives in the *Examiner's Manual*, the *Testing Coordinator's Manual*, and system correspondence; and
- (2) There was ethical behavior on the part of all staff and all students involved in the test administration; any suspected testing irregularity/circumstance has been reported to the system coordinator;;

in a matter within the jurisdiction of APS, a political subdivision of the State of Georgia, the GaDOE and GOSA, departments or agencies of state government; contrary to the laws of said State, the good order, peace and dignity thereof;

COUNT 57: FALSE STATEMENTS AND WRITINGS, O.C.G.A. § 16-10-20

and the GRAND JURORS aforesaid, in the name and on behalf of the citizens of the State of Georgia, do charge and accuse **DONALD BULLOCK** with the offense of **FALSE STATEMENTS AND WRITINGS**, in violation of O.C.G.A. § 16-10-20, for the said accused, in the County of Fulton and State of Georgia, on or about the **26th day of October, 2010**, did knowingly and willfully make false statements to a GBI agent, to wit:

- a. That he did not assist with anyone with getting tests to change answers on students' CRCT answer sheets;
- b. That he was not aware of any teachers erasing anything on students' CRCT tests in 2009;

in a matter within the jurisdiction of APS, a political subdivision of the State of Georgia, the GaDOE and GOSA, departments or agencies of state government; contrary to the laws of said State, the good order, peace and dignity thereof;

COUNT 58: FALSE SWEARING, O.C.G.A. § 16-10-71

and the GRAND JURORS aforesaid, in the name and on behalf of the citizens of the State of Georgia, do charge and accuse **DONALD BULLOCK**, with the offense of **FALSE SWEARING**, in violation of O.C.G.A. § 16-10-71, for the said accused, in the County of Fulton and State of Georgia, on or about the **23rd day of April, 2012**, having been administered a lawful oath by a hearing officer authorized to conduct Fair Dismissal Act hearings pursuant to O.C.G.A. § 20-4-940, did knowingly, willfully, and falsely swear that he followed the testing guidelines and did not allow teachers improper access to testing materials; contrary to the laws of said State, the good order, peace and dignity thereof;

BENTEN ELEMENTARY SCHOOL

COUNT 59: FALSE STATEMENTS AND WRITINGS, O.C.G.A. § 16-10-20

and the GRAND JURORS aforesaid, in the name and on behalf of the citizens of the State of Georgia, do charge and accuse **SHEILA EVANS** with the offense of **FALSE STATEMENTS AND WRITINGS**, in violation of O.C.G.A. § 16-10-20, for the said accused, in the County of Fulton and State of Georgia, during the CRCT testing period, on or between the **21st day of April, 2009** and the **30th day of April, 2009**, the exact date(s) being unknown to the Grand Jurors at this time, did knowingly and willfully make and use false documents and writings, knowing the same to contain false entries, by giving students correct answers to the 2009 CRCT, thereby causing them to falsify their 2009 CRCT answers sheets at Benteen Elementary School; in a matter within the jurisdiction of APS, a political subdivision of the State of Georgia, the GaDOE, and GOSA, departments or agencies of state government; contrary to the laws of said State, the good order, peace and dignity thereof;

COUNT 60: THEFT BY TAKING, O.C.G.A. § 16-8-2

and the GRAND JURORS aforesaid, in the name and on behalf of the citizens of the State of Georgia, do charge and accuse, **THERESIA COPELAND** and **SHEILA EVANS** with the offense of **THEFT BY TAKING**, in violation of O.C.G.A. § 16-8-2, for the said accused in the County of Fulton and State of Georgia, on or about the **18th day of December, 2009**, and while employees of a government institution in breach of their duties as government employees, did unlawfully take U.S. currency, the property of APS, with the intention of depriving said owner of said property, by causing APS to issue each of the accused a bonus check based on falsified test results on the 2009 CRCT for Benteen Elementary School; contrary to the laws of said State, the good order, peace and dignity thereof;

COUNT 61: FALSE STATEMENTS AND WRITINGS, O.C.G.A. § 16-10-20

and the GRAND JURORS aforesaid, in the name and on behalf of the citizens of the State of Georgia, do charge and accuse **THERESIA COPELAND** with the offense of **FALSE STATEMENTS AND WRITINGS**, in violation of O.C.G.A. § 16-10-20, for the said accused, in the County of Fulton and State of Georgia, on or about the **30th day of April, 2009**, after said accused committed a testing violation by obtaining and using an actual copy of the 2009 CRCT to prepare students prior to the test administration, did knowingly and willfully make and use a false document and writing, knowing the same to contain false statements, by completing, signing, and submitting a CRCT School Certification Form for Benteen Elementary School to APS, to wit:

- (1) The written plans for testing were followed, including all directives in the *Examiner's Manual*, the *Testing Coordinator's Manual*, and system correspondence; and
- (2) There was ethical behavior on the part of all staff and all students involved in the test administration; any suspected testing irregularity/circumstance has been reported to the system coordinator;

in a matter within the jurisdiction of APS, a political subdivision of the State of Georgia, the GaDOE and GOSA, departments or agencies of state government; contrary to the laws of said State, the good order, peace and dignity thereof;

COUNT 62: FALSE STATEMENTS AND WRITINGS, O.C.G.A. § 16-10-20

and the GRAND JURORS aforesaid, in the name and on behalf of the citizens of the State of Georgia, do charge and accuse **THERESIA COPELAND** with the offense of **FALSE STATEMENTS AND WRITINGS**, in violation of O.C.G.A. § 16-10-20, for the said accused, in the County of Fulton and State of Georgia, on or about the **10th day of November, 2010**, did knowingly and willfully make false statements to a GBI agent, to wit:

- d. That she knew nothing about anyone cheating on the test;
- e. That she followed testing protocol and tests were put back in the vault after the materials were returned from teachers;
- f. That she was not involved in cheating at Benteen Elementary School;

in a matter within the jurisdiction of APS, a political subdivision of the State of Georgia, the GaDOE and GOSA, departments or agencies of state government; contrary to the laws of said State, the good order, peace and dignity thereof;

COUNT 63: FALSE STATEMENTS AND WRITINGS, O.C.G.A. § 16-10-20

and the GRAND JURORS aforesaid, in the name and on behalf of the citizens of the State of Georgia, do charge and accuse **SHEILA EVANS** with the offense of **FALSE STATEMENTS AND WRITINGS**, in violation of O.C.G.A. § 16-10-20, for the said accused, in the County of Fulton and State of Georgia, on or about the **10th day of November, 2010**, did knowingly and willfully make false statements to a GBI agent, to wit:

- g. That she did not give students answers to the CRCT;
- h. That she did not answer questions to the CRCT for students;
- i. That she did not participate in any cheating at Benteen Elementary School;

in a matter within the jurisdiction of APS, a political subdivision of the State of Georgia, the GaDOE and GOSA, departments or agencies of state government; contrary to the laws of said State, the good order, peace and dignity thereof;

D.H. STANTON ELEMENTARY SCHOOL

COUNT 64: FALSE STATEMENTS AND WRITINGS, O.C.G.A. § 16-10-20

and the GRAND JURORS aforesaid, in the name and on behalf of the citizens of the State of Georgia, do charge and accuse **WILLIE DAVENPORT** with the offense of **FALSE STATEMENTS AND WRITINGS**, in violation of O.C.G.A. § 16-10-20, for the said accused, in the County of Fulton and State of Georgia, on or between the **30th day of April, 2009** and the **30th day of May, 2009**, the exact date(s) being unknown to the Grand Jurors at this time, did knowingly and willfully make and use false documents and writings, knowing the same to contain false entries, by submitting to APS attendance records for students at D.H. Stanton Elementary School reflecting students as present when they were absent from school; in a matter within the jurisdiction of APS, a political subdivision of the State of Georgia, the GaDOE, and GOSA, departments or agencies of state government; contrary to the laws of said State, the good order, peace and dignity thereof;

COUNT 65: FALSE STATEMENTS AND WRITINGS, O.C.G.A. § 16-10-20

and the GRAND JURORS aforesaid, in the name and on behalf of the citizens of the State of Georgia, do charge and accuse **WILLIE DAVENPORT** and **FRANCIS MACK** with the offense of **FALSE STATEMENTS AND WRITINGS**, in violation of O.C.G.A. § 16-10-20, for the said accused, in the County of Fulton and State of Georgia, on or about the **1st day of May, 2009**, did knowingly and willfully make and use a false document and writing, knowing the same to contain false statements, by completing, signing, and submitting a CRCT School Certification Form for D.H. Stanton Elementary School to APS stating that:

- (1) All test materials were stored in a locked central location prior to, during, and after the test administration each day;
- (2) The written plans for testing were followed, including all directives in the *Examiner's Manual*, the *Testing Coordinator's Manual*, and system correspondence; and
- (3) There was ethical behavior on the part of all staff and all students involved in the test administration; any suspected testing irregularity/circumstance has been reported to the system coordinator;

contrary to the laws of said State, the good order, peace and dignity thereof.

PAUL L. HOWARD, JR., District Attorney

Part 2
Exhibits 11-12-15

MANN & MORAN, PC

Attorneys

October 21, 2015

VIA CERTIFIED MAIL RETURN
RECEIPT REQUESTED NO.
7015 0640 0003 1866 0074

VIA E-MAIL TO:
Jennifer.Liwo@arkansas.gov

Jennifer N. Liwo, Staff Attorney
Ethics & Licensure
Arkansas Department of Education,
Professional Licensure Standards Board
Four Capitol Mall, Box 30
Little Rock, Arkansas 72201

RE: Sharon Davis-Williams
AELS CID: 26887




Dear Ms. Liwo:

Thank you for your letter dated September 1, 2015 regarding the *Waiver Hearing Request* on behalf of Dr. Sharon Davis-Williams. Per the instructions set forth therein, attached hereto please find supporting documentation addressing considerations to be utilized by the Board in connection with Dr. Davis-Williams' waiver request. As instructed, the names and telephone numbers of those persons who may verify the information contained in the statements or references are contained therein.

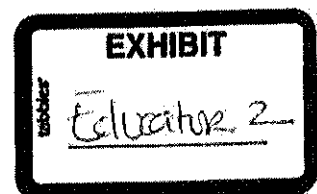
If any additional information is needed or required, please do not hesitate to contact me via e-mail at: tma1234@bellsouth.net or at the address/telephone number below.

Your assistance is appreciated.

Sincerely,
MANN & MORAN, PC


Teresa A. Mann

STATEMENT IN SUPPORT OF SHARON DAVIS-WILLIAMS



**WRITTEN STATEMENT OF SUPPORT FOR
SHARON DAVIS - WILLIAMS
AELS CID - 26887**

In 2009 the Atlanta Journal-Constitution published an article wherein it questioned extraordinary gains and losses on the Criterion-Referenced Competency Tests (CRCT) throughout the State of Georgia. Following the article the Governor's office commissioned an investigation to look into many of the results disclosed by the news article. The investigation resulted in a report commonly referred to as "The Governor's Report" which was released in July 2011. The Report detailed test-tampering in 44 of Atlanta's 56 public schools in 2009. The 56 elementary and middle schools were divided into four School Reform Teams. As a result of the investigation, many teachers, principals, and assistants from all four School Reform Teams either confessed to cheating or to having knowledge that cheating occurred. Those who confessed were either given immunity from prosecution or given very generous plea deals.

At the time of the investigation, Dr. Sharon Davis-Williams (Dr. Davis-Williams) served as an Executive Director for School Reform Team 1. She served in this capacity from school year 2004-2005 through and including school year 2010-2011. During any given school year, there were anywhere from fourteen to twenty schools and principals under Dr. Davis-Williams' supervision. Dr. Davis-Williams' job duties and responsibilities did not require her to have day to day interaction or encounters with the students who attended the schools within her School Reform Team.

On March 29, 2013, Dr. Davis-Williams was one of thirty-five educators and administrators indicted by a Fulton County Georgia grand jury for Violation of Racketeer Influenced and Corrupt Organizations Act (RICO) and various other substantive offenses. Specifically, Dr. Davis-Williams was indicted on four separate counts. In addition to RICO, the conspiracy count, Dr. Davis-Williams was charged with two counts of False Statements and Writings and one count of False Swearing. Dr. Davis-Williams was never accused of playing an active role in assisting the students with cheating. Instead, Dr. Davis-Williams was accused of ignoring and/or covering up cheating. When the trial commenced in August 2014 only twelve of the thirty-five original defendant's remained. Following an eight month jury trial that ended on April 1, 2015, Dr. Davis-Williams was acquitted of the three charges that accused her of ignoring and/or covering up cheating, but found guilty of violating RICO. On April 30, 2015, Dr. Davis-Williams was sentenced to ten years to serve three and the balance of seven on probation. (See *Final Disposition Sheet* attached hereto). Dr. Davis-Williams' incarceration has been deferred pending the appeal of her conviction. In May 2015 Dr. Davis-Williams turned sixty years old.

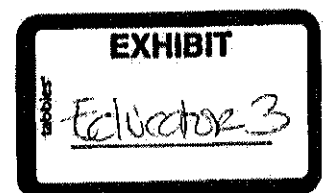
Although Dr. Davis-Williams was found guilty of violating Georgia's RICO statute, an adjudication of her guilt is being deferred at this time, pursuant to

Georgia's First Offender Statute, as ordered by the Honorable Jerry Baxter (See Page 3 of the Final Disposition Sheet attached hereto). Pursuant to Georgia's First Offender Statute (See Official Code of Georgia Annotated §42-8-60 and §42-8-62 attached hereto) a court, following a verdict of guilty, has the authority to withhold an adjudication of guilt against the Defendant until after the Defendant has fulfilled certain conditions as prescribed by the Court. If and when a Defendant satisfies the Court's conditions, then the Defendant is discharged of the convicted offense, without an adjudication of guilt, and deemed to be completely exonerated of the offense charged. On the other hand, if the Defendant does not satisfy the Court's conditions, then the Defendant can be adjudicated guilty. Finally, per the First Offender Statute "a discharge is not a conviction of a crime and may not be used to disqualify any application for employment or appointment to office in either the public or private sector." (See Official Code of Georgia Annotated §42-8-63 attached hereto).

In the present instance, Dr. Davis-Williams was notified on July 14, 2015, of this Board's intent to revoke her license as the result of her guilty plea to a disqualifying offense. However, the attached documentation clearly demonstrates that Dr. Davis-Williams has never pled guilty nor been adjudicated guilty of committing any criminal offense. In contrast, the undisputed facts are that while Dr. Davis-Williams has been found guilty by a jury, the trial judge has never entered an order adjudicating her guilt and therefore it cannot be said that Dr. Davis-Williams violated a disqualifying offense. It is because Dr. Davis-Williams' criminal guilt remains unresolved at this time and may ultimately result in her being exonerated that her request for a waiver of the alleged disqualifying offense should be granted. In addition to Dr. Davis-Williams' First Offender status, this Board should also grant her request for a waiver due to the fact that she has formally initiated her post-conviction remedies by filing a Motion for New Trial. Although the outcome of her post-conviction efforts cannot be determined at this time, it is highly prejudicial and unfair to revoke her license until a final decision has been made.

In addition to this statement, Dr. Davis Williams has attached a detailed work history and several professional and character references. For the reasons set forth above and the references given in her support, Dr. Davis-Williams respectfully prays that this Board grant her request for a waiver of disqualifying offense.

FINAL DISPOSITION SHEET



☐ Amended Sentence ☐ Modified Sentence ☐ Revoked 1st Offender Sentence ☒ Re-Sentence

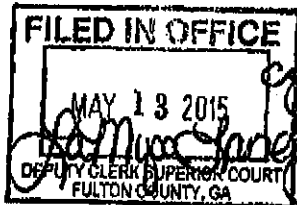
IN THE SUPERIOR COURT OF FULTON COUNTY, STATE OF GEORGIA

STATE OF GEORGIA vs

SHARON DAVIS-WILLIAMS

CRIMINAL ACTION #:
13SC117954

May- June Term of 2015



Clerk to complete if incomplete:

OTN(s):

DOB: [REDACTED]

GA. ID#:GA-052188133

Final Disposition:
FELONY With PROBATION

First Offender/ Conditional Discharge entered under :

☒ O.C.G.A. § 42-8-60 ☐ O.C.G.A. § 16-13-2

☐ Repeat Offender as imposed below

PLEA:

☐ Repeat Offender Waived

☐ Negotiated

☐ Non-negotiated

VERDICT:

☒ Jury

☐ Non-Jury

The Court enters the following judgment:

Count	Charge (as indicted or accused)		Disposition Guilty; Not Guilty; Guilty-Afford; Guilty-Lesser in; Not Pros; Nolo; Dead Docket Order; Guilty-1 st Offender; Guilty-1 st Offender Afford	Sentence	Fine	Concurrent/ Consecutive, Merged, Suspende Commute to Time Served
1	RACKETEERING	<i>16-14-4(C)</i>	GUilty-FIRST OFFENDER ACT (O.C.G.A. 42-8-80)	10(TEN) YEARS TO SERVE 3(THREE) YEARS AND BALANCE OF 7(SEVEN) YEARS TO BE SERVED ON PROBATION		
5	FALSE STATEMENTS AND WRITINGS	16-10-20	JURY VERDICT NOT GUILTY			
6	FALSE STATEMENTS AND WRITINGS	16-10-20	JURY VERDICT NOT GUILTY			
7	FALSE SWEARING	16-10-71	DIRECTED VERDICT OF ACQUITTAL			

The Defendant is adjudged guilty or sentenced under First Offender/Conditional Discharge for the above-stated offense(s); the Court sentences the Defendant to confinement in such institution as the Commissioner of the State Department of Corrections may direct, with the period of confinement to be computed as provided by law.

Sentence Summary: The Defendant is sentenced for a total of : 10(TEN) YEARS TO SERVE 3(THREE) YEARS AND BALANCE OF 7(SEVEN) YEARS TO BE SERVED ON PROBATION

13SC117954

SHARON DAVIS-WILLIAMS

☒ with the
served

3(THREE) YEARS

first to be served in confinement and the remainder to be

on probation; or ☐ to be served on probation.

The Defendant is to receive credit for time served in custody: ☐ from ☐; or ☐ as determined by the
custodian.

☐ 1. The above sentence may be served on probation provided the Defendant shall comply with the
Conditions of Probation Imposed by the Court as part of this sentence.

☒ 2. Upon service of 3(THREE) YEARS, the remainder of the sentence may be served on
probation; PROVIDED, that the Defendant shall comply with the Conditions of Probation Imposed by the Court
as part of this sentence.

☐ 3. The Court sentences the Defendant as a recidivist under O.C.G.A.:

☐ § 17-10-7(a); ☐ § 17-10-7(c); ☐ § 16-7-1(b); ☐ § 16-8-14(b); or ☐ §

GENERAL CONDITIONS OF PROBATION

The Defendant is subject to arrest for any violation of probation. If probation is revoked, the Court may
order incarceration. The Defendant shall comply with the following General Conditions of Probation: 1) Do not
violate the criminal laws of any governmental unit and be of general good behavior. 2) Avoid injurious and
vicious habits. 3) Avoid persons or places of disreputable or harmful character. 4) Report to the Probation
Officer as directed and permit the Probation Officer to visit you at home or elsewhere. 5) Work faithfully at
suitable employment insofar as may be possible. 6) Do not change your place of abode, move outside the
jurisdiction of the Court, or leave Georgia without permission of the Probation Officer. If permitted to move or
travel to another state, you agree to waive extradition from any jurisdiction where you may be found and not
contest any effort by any jurisdiction to return you to this State. 7) Support your legal dependents to the best of
your ability. 8) When directed, in the discretion of the Probation Officer: (a) submit to evaluations and testing
relating to rehabilitation and participate in and successfully complete rehabilitative programming; (b) wear a
device capable of tracking location by means including electronic surveillance or global positioning satellite
systems; (c) complete a residential or nonresidential program for substance abuse or mental health treatment;
and/or (d) agree to the imposition of graduated sanctions as defined by law. 9) Make restitution as ordered by
the Court.

FINE SURCHARGES or ADD-ONS: The Court assesses all fine surcharges or add-ons as required by
the laws of the State of Georgia and as are applicable to offense(s) for which the Defendant has been
convicted.

- 1) The Court orders that: ☒ the Defendant shall pay the probation supervision fee as required by law; or
☐ the probation supervision fee is waived.
- 2) If counsel was provided under the Georgia Indigent Defense Act: ☐ the Defendant shall pay the \$50
Public Defender Application Fee; or ☐ the Public Defender Application Fee is waived.
- 3) If counsel was provided at public expense: ☐ the Defendant shall pay attorney's fees of
\$ to County; or attorney's fees are waived.
- 4) The Defendant shall pay the Crime Lab Fee as required by law.

SPECIAL CONDITIONS OF PROBATION

The Defendant is advised that violation of any Special Condition of Probation may subject the
Defendant to a revocation of probation and the Court may require the Defendant to serve up to the balance of
the sentence in confinement. The Defendant shall comply with all Special Conditions of Probation: ☐ as

designated on the attached Inventory of Special Conditions of Probation; or [X] as follows: *(import conditions to be imposed from Inventory of Special Conditions of Probation)*. Defendant is required to complete 2000 hours of community service to be assigned and directed by Fulton County District Attorney's office . District Attorney's office is to send compliance and completion report to supervising probation officer upon defendant 's fulfillment of community service. Defendant is required to pay \$10,000.00 fine and to be given the entire duration of probation to pay in its entirety. As of April 14th, 2014 defendant is out of custody on appeal bond and is to remain as such until time that all pending appeals have been heard and ruled upon. Any violations of this sentence or conditions are to be returned to Judge Baxter.

FIRST OFFENDER OR CONDITIONAL DISCHARGE

(If designated by the Court)

The Defendant consenting hereto, it is the judgment of the Court that no judgment of guilt be imposed at this time but that further proceedings are deferred and the Defendant is hereby sentenced to confinement at such institution as the Commissioner of the State Department of Corrections or the Court may direct, with the period of confinement to be computed as provided by law.

Upon violation of the terms of probation, upon conviction for another crime during the period of probation, or upon the Court's determination that the Defendant is or was not eligible for sentencing under the First Offender Act or for Conditional Discharge, the Court may enter an adjudication of guilt and proceed to sentence the Defendant to the maximum sentence as provided by law.

Upon fulfillment of the terms of this sentence, or upon release of the Defendant by the Court prior to the termination of this sentence, the Defendant shall stand discharged of said offense without court adjudication of guilt and shall be completely exonerated of guilt of said offense charged.

For Court's Use:

The Hon. TERESA A MANN, Attorney at Law, represented the Defendant by:
[x] employment; or [] appointment.

Evelyn Parker

Court Reporter

SO ORDERED this 8th day of May, 2015


JERRY BAXTER
Judge of Superior Court
Atlanta Judicial Circuit

Judge Jerry W. Baxter

(print or stamp Judge's name)

FIREARMS – If you are convicted of a crime punishable by imprisonment for a term exceeding one year, or of a misdemeanor crime of domestic violence where you are or were a spouse, intimate partner, parent, or guardian of the victim, or are or were involved in another similar relationship with the victim, it is unlawful for you to possess or purchase a firearm including a rifle, pistol, or revolver, or ammunition, pursuant to federal law under 18 U.S.C. § 922(g)(9) and/or applicable state law.

Acknowledgment: I have read the terms of this sentence or had them read and explained to me. If all or any part of this sentence is probated I certify that I understand the meaning of the order of probation and the conditions of probation. I understand that violation of a special condition of probation could result in revocation of all time remaining on the period of probation.

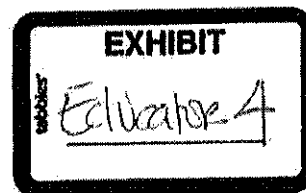
Defendant

GEORGIA STATUTORY LAW

O.C.G.A. §42-8-60

O.C.G.A. §42-8-62

O.C.G.A. §42-8-63



Section 42-8-60 Probation before adjudication; violations; nonapplicability

(a) Upon a verdict or plea of guilty or a plea of nolo contendere, but before an adjudication of guilt, in the case of a defendant who has not been previously convicted of a felony, the court may, without entering a judgment of guilt and with the consent of the defendant:

- (1) Defer further proceeding and place the defendant on probation as provided by law; or
- (2) Sentence the defendant to a term of confinement as provided by law.

(b) Upon violation by the defendant of the terms of probation, upon a conviction for another crime during the period of probation, or upon the court determining that the defendant is or was not eligible for sentencing under this article, the court may enter an adjudication of guilt and proceed as otherwise provided by law. No person may avail himself or herself of this article on more than one occasion.

(c) The court shall not sentence a defendant under the provisions of this article and, if sentenced under the provisions of this article, shall not discharge the defendant upon completion of the sentence unless the court has reviewed the defendant's criminal record as such is on file with the Georgia Crime Information Center.

(d) The court shall not sentence a defendant under the provisions of this article who has been found guilty of or entered a plea of guilty or a plea of nolo contendere for:

- (1) A serious violent felony as such term is defined in Code Section 17-10-6.1;
- (2) A sexual offense as such term is defined in Code Section 17-10-6.2;
- (3) Sexual exploitation of a minor as defined in Code Section 16-12-100;
- (4) Electronically furnishing obscene material to a minor as defined in Code Section 16-12-100.1;
- (5) Computer pornography and child exploitation, as defined in Code Section 16-12-100.2; or
- (6) (A) Any of the following offenses when such offense is committed against a law enforcement officer while such officer is engaged in the performance of his or her official duties:
 - (i) Aggravated assault in violation of Code Section 16-5-21;
 - (ii) Aggravated battery in violation of Code Section 16-5-24; or
 - (iii) Obstruction of a law enforcement officer in violation of subsection (b) of Code Section 16-10-24, if such violation results in serious physical harm or injury to such officer.
- (B) As used in this paragraph, the term "law enforcement officer" means:
 - (i) A "peace officer" as such term is defined in paragraph (8) of Code Section 35-8-2;
 - (ii) A law enforcement officer of the United States government;

(iii) A person employed as a campus police officer or school security officer;

(iv) A conservation ranger; and

(v) A jail officer employed at a county or municipal jail.

HISTORY: Ga. L. 1968, p. 324, § 1; Ga. L. 1982, p. 1807, § 1; Ga. L. 1985, p. 380, § 1; Ga. L. 1986, p. 218, § 1; Ga. L. 2006, p. 379, § 26/HB 1059; Ga. L. 2012, p. 172, § 1/SB 231.

Section 42-8-62 Discharge of defendant

(a) Upon fulfillment of the terms of probation, upon release by the court prior to the termination of the period thereof, or upon release from confinement, the defendant shall be discharged without court adjudication of guilt. Except for the registration requirements under the state sexual offender registry and except as otherwise provided in Code Section 42-8-63.1, the discharge shall completely exonerate the defendant of any criminal purpose and shall not affect any of his or her civil rights or liberties; and the defendant shall not be considered to have a criminal conviction. It shall be the duty of the clerk of court to enter on the criminal docket and all other records of the court pertaining thereto the following:

"Discharge filed completely exonerates the defendant of any criminal purpose and shall not affect any of his or her civil rights or liberties, except for registration requirements under the state sexual offender registry and except with regard to employment providing care for minor children or elderly persons as specified in Code Section 42-8-63.1; and the defendant shall not be considered to have a criminal conviction. O.C.G.A. 42-8-62."

Such entry shall be written or stamped in red ink, dated, and signed by the person making such entry or, if the docket or record is maintained using computer print-outs, microfilm, or similar means, such entry shall be underscored, boldface, or made in a similar conspicuous manner and shall be dated and include the name of the person making such entry. The criminal file, docket books, criminal minutes and final record, and all other records of the court relating to the offense of a defendant who has been discharged without court adjudication of guilt pursuant to this subsection shall not be altered as a result of that discharge, except for the entry of discharge thereon required by this subsection, nor shall the contents thereof be expunged or destroyed as a result of that discharge.

(b) Should a person be placed under probation or in confinement under this article, a record of the same shall be forwarded to the Georgia Crime Information Center. Without request of the defendant a record of discharge and exoneration, as provided in this Code section, shall in every case be forwarded to the Georgia Crime Information Center. In every case in which the record of probation or confinement shall have been previously forwarded to the Department of Corrections, to the Georgia Crime Information Center, and to the Identification Division of the Federal Bureau of Investigation and a record of a subsequent discharge and exoneration of the defendant has not been forwarded as provided in this Code section, upon request of the defendant or his attorney or representative, the record of the same shall be forwarded by the clerk of court so as to reflect the discharge and exoneration.

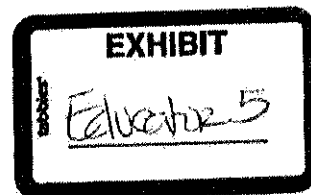
HISTORY: Ga. L. 1968, p. 324, § 2; Ga. L. 1978, p. 1621, § 1; Ga. L. 1982, p. 1807, § 3; Ga. L. 1985, p. 283, § 1; Ga. L. 1986, p. 442, § 1; Ga. L. 1990, p. 735, § 1; Ga. L. 2001, p. 1004, § 2; Ga. L. 2003, p. 840, § 4.

Section 42-8-63 Effect of discharge

Except as otherwise provided in this article, a discharge under this article is not a conviction of a crime under the laws of this state and may not be used to disqualify a person in any application for employment or appointment to office in either the public or private sector.

HISTORY: Ga. L. 1978, p. 1621, § 2.

SHARON DAVIS-WILLIAMS' WORK HISTORY



Sharon Davis Williams Work History

August 2015-Present- Gideon's Promise-Volunteer Outreach Projects; Primary Focus: Designing & Implementing "Know Your Rights" Campaign; Research and grant writing; Assisting Development Coordinator in outreach projects; and Answering prisoner's mail.

2012-2013- INDEPENDENT EDUCATION CONSULTANT; Evans Newton, Scottsdale, AZ; PRIMARY Focus: Perform educational administrative and staff services on products and services developed by the company to end of sustaining school transformation.

2004- 2012 Atlanta Public Schools, Atlanta, GA, Executive of K-8 Schools Area 1- Primary Focus: Supported the Superintendent in the leadership and management of 18 elementary and 5 middle schools to improve the performance of all personnel to the end of increasing the success of all students under my general supervision. More than 10,000 students and their families were served.

1999-2004 Gary Community School Corporation, Gary, IN ASSISTANT TO THE SUPERINTENDENT/ASSISTANT SUPERINTENDENT FOR CURRICULUM & INSTRUCTION; Primary Focus: Supported the Superintendent in the leadership and management of 16 elementary, 8 middle and 4 high schools that served 17,500 students and their families.

1988- 1999 Little Rock School District, Little Rock, AR SCHOOL LEADERSHIP Primary Focus: Provided leadership and supervision of instructional and support personnel to the end of influencing growth of student learning.

1987-1988 Little Rock School District, Little Rock, AR SCHOOL COUNSELOR Primary Focus: Provided a prevention counseling program for K-6 students

1979-1987 Little Rock/North Little Rock School Districts, SPEECH PATHOLOGIST/SPECIAL EDUCATOR Primary Focus: Diagnosis, development and implementation of Individual Education Plans [IEPs] for special education students.

1977-1979 ARKANSAS River Valley Area Council, Russellville, AR REGIONAL SERVICE PROVIDER FOR HEADSTART Primary Focus: Coordinated the delivery of speech and language services in 9 counties.

PROFESSIONAL & PERSONAL CHARACTER REFERENCES

Judge Olly Neal, Retired AR Court of Appeals

Mary E. Guinn, Ed.D.

Kathy M. Augustine, Ed.D.

Wayne Spencer Jack, Ed.D.

Lillie M. Scull, Retired Elementary School Principal

Joy Eichelberger, Ed.D., CEO, ETC LLC

Ilham N. Askia, Executive Director, Gideon's Promise

EXHIBIT

Educator 6

Arkansas Department of Education
Professional Licensure Standard Board
One Capitol Mall, Suite 4C-216
Little Rock, AR 72201

October 19, 2015

To Whom It May Concern

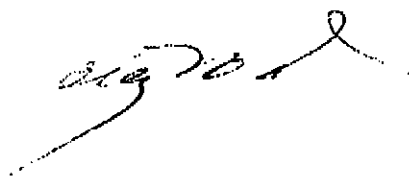
In the matter of: Dr. Sharon Davis Williams

This correspondence is provided on behalf of Dr. Davis Williams who I have known virtually all of her life. Sharon was born in Mariana, AR and spent her formative years there. Raised by loving and caring grandparents, she demonstrated a determination to grow beyond the confines of the limitations of her immediate environment. I had an opportunity to personally observe her as one who had a desire to help the neediest in our community. I founded the Lee County Community Health Clinic to provide health services to the poor and elderly. Sharon, while still in high school stepped forward to help staff our clinic as a clerical assistant. In that role she managed patient records that were critical to the operation of the clinic. After graduation from high school, I watched her leave behind her family and friends and journey to Little Rock after she had earned admission to the University of AR at Little Rock. A review of her work history will show that others recognized her work ethic as she practiced her profession as an educator. Drawing upon her personal experiences, it was easy to discern her deep belief that poor children, not only can learn, given the right environment and resources they will meet performance expectations set for them.

I am fully aware of the circumstances that have brought into question Dr. Davis Williams' fitness to continue serving as an active practitioner in her chosen field. As a former Officer of the Court and member of the AR Judiciary, I am keenly aware that although we have a good criminal justice system, it is not without flaws. One need only review current events and the growing consensus to effect much needed reforms in our system of justice. It is also instructive to note that Dr. Davis Williams was found not guilty of all charges brought against her except the GA State RICO Act. A crime she was convicted of solely because she was employed by the Atlanta Public Schools and indicted as a co-conspirator based upon a legal assertion that if any one of the 35 people indicted was found guilty of racketeering, all of those indicted were guilty of racketeering. Stated differently, the defendants fell victim to "guilt by association".

Summarily, as you deliberate, I ask that you consider the many years of unblemished service that Dr. Davis Williams has provided to children who attend public schools. I also ask that you recognize that the case has not reached final resolution owing to pending motions for a new trial and an appeal that is before the court. There is nothing in Dr. Davis Williams' record indicating that she has ever done anything to harm children.

Her need to retain her license to practice is to enable her to continue her work with adults in her field. During her tenure as an active professional, she has accumulated a wealth of information that will help those who work directly with children.

A handwritten signature in black ink, appearing to read "Olly Neal", with a stylized flourish at the end.

Judge Olly Neal [Retired]
AR Court of Appeals



Mary E. Guinn, Ed.D



**Arkansas Department of Education
Professional License Standards Board**

This letter is written in support of Dr. Sharon D. Williams' request for consideration of a Waiver in order to maintain her professional license in the State of Arkansas. I have known Dr. Davis for more than 30 years as a professional colleague and as her supervisor as the Superintendent of Schools in Gary, Indiana. While in Arkansas, Dr. Davis and I served as colleagues in the field of education and administration in the Little Rock School District while also pursuing our doctoral degrees at the University of Arkansas at Little Rock. I can attest to her professional commitment to children and to her character.

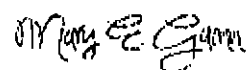
Dr. Davis, a Lee County Arkansas native is uniquely aware of the struggles of poor children and the need to succeed in life to overcome personal circumstances. She has been instrumental in setting high expectations poor students throughout her career. Specifically, she was recognized in State Department of Education research conducted by the University of Arkansas at Little Rock as one of only three schools in the tri-district Pulaski County school districts that demonstrated a decrease in the achievement gap. She along with two colleagues with whom she had worked closely shared similar philosophies and received similar results.

As the Superintendent of Schools in Gary, Indiana, I recruited Dr. Davis as the Special Assistant to the Superintendent with the responsibilities of a Chief of Staff. In this role, she was responsible for ensuring that all policies and procedures of the Board were implemented and responsible for creating policies where needed. Dr. Davis was charged with implementing a Test Security Policy consistent with the one that we had both used in the State of Arkansas. Components of this policy continue to operate in the district. Dr. Davis was also responsible for assisting me in the day-to-day operation of the district where over ninety percent of the children were poor. Her commitment and expectations for high quality teaching and learning mirrored those she had for the children of Arkansas. Dr. Davis performed her professional responsibilities with a high degree of integrity and gained the respect of both policymakers and staff.

Dr. Davis is a trustworthy, hardworking educator that has given her life to successfully educating all children. Her commitment has been passed on to many family members including her two daughters who now work as teachers. In addition to influencing her family, she can be credited with mentoring teachers to become administrators with a belief that all children can be successfully educated with high quality staff.

For these stated reasons, I ask you to strongly consider her request for consideration of a Waiver to maintain her Arkansas certification. Thank you for attention to this request. If I can be of further assistance, please let me know.

Sincerely,

A handwritten signature in cursive script, appearing to read "Mary E. Guinn".

Mary E. Guinn, Ed.D

Kathy M. Augustine, Ed.D



October 13, 2015

Dear Board Members:

It is with great humility and without reservation of her character that I implore you to continue the Professional Licensure of Dr. Sharon Davis Williams. I believe that Dr. Williams' steadfast stand for truth and justice while enduring unconceivable professional, public and personal treatment, humiliation and loss is testimony to her faith, courage, moral conviction and integrity.

As the former Deputy Superintendent of Atlanta Public Schools, I had the opportunity of working with and supervising Dr. Davis Williams as one of my Executive Directors of Schools during her tenure in the system. She distinguished herself as a visionary, passionate educator and systems thinker. She was committed to and acted on her belief that all children possessed an innate ability to learn and would learn under the right conditions.

Sharon expertly demonstrated her vast knowledge, understanding and experiences in the areas of best instructional practices, adult learning and development, and organizational change. Sharon consistently exhibited virtues characteristic of exemplary leaders, especially, integrity, commitment, accountability, honesty, courage, empathy, and dependability. Early on, Sharon earned the respect and trust of the skillful, high performing educational leaders on my team. I observed that her peers recognized her strong leadership abilities and embraced her as a valuable asset to the team. Often, they chose her to represent their voices.

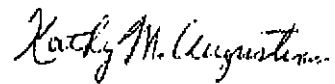
Sharon led the largest K-8 cluster of schools consisting of the most seasoned principals. She successfully guided, supported, and monitored the work of her principals, teachers, and area office team. Sharon's way of working with her team depicted her belief in establishing shared purpose and fostering collaboration. She created and actively participated on collaborative work teams to assess progress and identify and address common problems as a unit. The impact of her work with her team resulted in sustainable academic gains on the state criterion-referenced tests (CRCT) and National Assessment of Educational Progress (NAEP) in her schools during her tenure and years after she was unjustly removed from the system.

Continuous learning and professional growth were hallmarks of Sharon's leadership in the Atlanta Public Schools. Sharon was usually an early adopter of new knowledge and trailblazing practices to advance teaching and learning, services and communication between schools and the central office. She routinely took the initiative to go beyond the expected and pursue a deeper understanding of new practices in order to better support her team's learning and growth. System leaders and staff, consultants and foundation partners often acknowledged Sharon's strategic and insightful contributions to the learning experiences.

In closing, I cannot begin to understand or describe the heartbreak surrounding the unimaginable circumstances Sharon has experienced over these past 4 years. Her stand on truth and hope for justice through the appeals process is a testimony of her belief that righteousness will prevail. I can only hope that through my depiction of what I observed during my work with Sharon that you understand my

confidence in her innocence, outstanding character and abilities. And, that you honor her request to continue her professional license to practice as an educator. .

Respectfully yours,

A handwritten signature in cursive script that reads "Kathy M. Augustine".

Kathy M. Augustine, Ed.D

October 12, 2015

Arkansas Department of Education
Professional Licensure Standards Board
One Capitol Mall, Suite 4C-216
Little Rock, Arkansas 72201

To Whom It May Concern:

I am writing you on behalf of Dr. Sharon Davis-Williams. My reason for writing to you is to ask that the Arkansas Professional Licensure Standards Board not revoke Dr. Davis-Williams' professional license.

I have known Dr. Sharon Davis-Williams since 2003 when she came to work in the Atlanta Public Schools. I served as an elementary school principal under her supervision. I worked under her leadership until my retirement in 2007.

My experiences as a principal under Dr. Davis-Williams' leadership proved to be invaluable to my professional growth. I found her to be supportive of me in my role. I also found her to be knowledgeable of sound teaching practices. She encouraged collegiality among her principals and during our meetings asked us to share research-based best practices that could be useful in our respective buildings.

For example, at my school, Dr. Davis-Williams observed student work in the area of literacy and writing on one her many walkthroughs. She saw the results our school had achieved as a result of the standards based approach we used. She asked me to share my knowledge with my colleagues and scheduled a principals' meeting at my school. I delivered a half-day session on literacy and writing that included actual classroom observations and a review of student work and artifacts.

In 2010, Dr. Davis-Williams asked me to come out of retirement to serve as the interim principal of one her schools. I gladly did so because of my respect for her as an educator who has the best interests of children as a priority.

During the 2010-2011 school year, I gained renewed respect for Dr. Davis-Williams because I was aware of her deep concern for not only students but for teachers and staff members as well who were innocent victims of other peoples' misguided actions. I worked closely with Dr. Davis-Williams and witnessed firsthand, her care and commitment in making sure all students received a sound education.

I have the highest regard for Dr. Sharon-Davis Williams. I know she is a person of high integrity. Although I knew her as an educator first, I got to know her as a mother and as a grandmother as well. We shared stories about our children and grandchildren. We have the same thing in common; we both want the same opportunities for the students we serve as we want for our own children and grandchildren.

In closing, I again request that the Arkansas Professional Licensure Standards Board allows Dr. Sharon-Davis Williams to retain her professional credentials. She is, in my opinion an educator who can continue to contribute and to bring about positive results for the children whom she touches.

Sincerely,


Wayne Spencer Jack, Ed. D

October 13, 2015

Arkansas Professional Licensure Standards Board

Arkansas State Department of Education

Four Capitol Mall

Little Rock, Arkansas 72201

Re: Character Letter for Sharon Davis-Williams

To Whom It May Concern:

I am very pleased to write a character letter in support of Dr. Sharon Davis-Williams' Waiver Request. I have known Sharon for more than twenty-five years as my supervisor, mentor and colleague. On a more personal basis, and perhaps the most valuable relationship is the one that I am fortunate to continue sharing with her as my good friend. We enjoy visits and telephone conversations as often as possible.

When I met Sharon in the early 1990's, I was a teacher and she was an assistant principal in Little Rock School District, Little Rock, Arkansas. I often observed her interacting with teachers and students. She appeared to be considerate, caring, and empathetic. Those characteristics in a leader led me to seek a teaching position the following year in a school under Sharon Davis-Williams' leadership. I realized that she truly had those attributes and many more admirable ones. I was able to closely observe her dedicated and enthusiastic service to children, parents, teachers and other administrators. I learned much and acquired valuable experiences through her supervision.

Being a parent herself, Sharon frequently spoke to her students about the importance of setting goals and believing in themselves. As a school leader, she involved children in experiences to help them build self-esteem and positive self-concepts. I particularly liked that Sharon implemented and maintained an exemplary "Student of the Week" program in our school. Many students began to improve academically and socially through their involvement in the program and the individual attention they received.

For several years, Sharon served as an administrator in schools heavily populated with students and families identified as low socio-economic status. She vigorously engaged in necessary and oftentimes challenging meetings, and long hours of committed work to ensure that these students received equal

and deserving resources to be able to move toward achieving their goals. In addition, I can vividly remember seeing Sharon interacting with the school's PTA to advise and plan for immediate and future needs of our students. Many more resources and school improvements were achieved through her committed and devoted work with parent and community leaders. Positive, and mutually respectful relationships grew from these encounters.

The daily tasks, rigorous work load and responsibilities of a school leader can be very demanding and even stressful to many who've chosen these roles. Despite the obvious challenges surrounding her role; Sharon never showed signs of stress or anxiety. To say it mildly, "she keeps her cool". Sharon Davis-Williams is a role model and great example of a patient and level-headed person.

Finally, it touches my spirit to acknowledge how much I admire Sharon's self-motivation, confidence, and perseverance. I am sure that these attributes helped her in becoming the loving mother and grandmother that she is today. My friend, Sharon Davis-Williams, continues to extend love, loyalty and support to many; and our lives are greatly impacted. I ask you to strongly consider her request.

Sincerely,



Lillie M. Scull,

Retired Elementary School Principal

Little Rock School District



[REDACTED]
October 14, 2015

Arkansas Department of Education
Professional Licensure Standards Board
One Capitol Mall, Suite 4C-216
Little Rock, Arkansas 72201

RE: Sharon Davis Williams

To Whom It May Concern,

I am honored to pen this character reference for Dr. Sharon Davis Williams. Having known Sharon for a relatively short period of time (2-3 years), I have been highly impressed with her level of commitment and loyalty to those areas in her life that matter most; her faith, her family, and her profession.


Dr. Williams and I fellowship at the same church, belong to the same Sunday school class, are prayer partners and friends. She is a loyal and faithful Christian and seeks to know the Word of God through consistent study, and apply the Word of God to all aspects of her life. Serving the Church through the Board of Christian Education, Dr. Williams volunteers her expertise to guide the educational program of the Church. Her word is trustworthy and true and she is careful not to make commitments she is doubtful of keeping. Faithful, trustworthy and committed describe her Christian character.

A devoted wife, mother and grandmother, Dr. Williams has dedicated her life to caring for and nurturing her family. The character and integrity of her two daughters are testament to what she poured into them. Their and her husband's love, respect, and faith in her is demonstrated in the relentless support of her current situation with the Atlanta Public Schools trial. Maintaining her innocence, the family never asked her to compromise her integrity to ease the burden of the potential outcome. Devoted, hard-working, reliable, dedicated, loyal and a woman of integrity define her familial characteristics.

Sharon's commitment to her faith and family is consistent with her commitment to the education of low income disenfranchised children. She worked endless hours to ensure the best possible education for the students assigned to her schools. In addition, she provided the support necessary to build the capacity of staff members under her supervision. Dr. Williams is stellar leader who cared for and supported her staff by their own testimony. Supportive, respectful, and a leader by example illustrate her professional character.

Loyal, faithful, dedicated, honest, hardworking, reliable, caring, dedicated and trustworthy only begin to define the character of my friend, Dr. Sharon Davis Williams. I urge you to consider these attributes in your deliberation. Education without Dr. Williams would be a disservice to the plethora of children, families and administrators who need and deserve her expertise and experience.

Sincerely,


Joy Eichelberger, Ed.D.
CEO, ETC LLC
Leadership and School Improvement Specialists
[REDACTED]

cc: [REDACTED]



Strengthening Public Defenders. Transforming Public Defense.

October 13, 2015

To Whom It May Concern:

I am pleased that Dr. Sharon Davis-Williams is serving as a volunteer at Gideon's Promise, a non-profit, 501c3 designated organization that works to ensure equal justice for poor people across the country. As a former educator serving on administrative and school level teams in public school systems, I am confident that Dr. Davis-Williams will continue to be an asset to our outreach efforts teaching the youth about the justice system and in other areas where she is needed. I have witnessed countless times the sheer joy she exudes when interacting with children including my two small children. Our entire team is pleased that she is working with us. I cannot imagine how we have managed without her.

Gideon's Promise was founded in 2007 by MacArthur 'Genius' Fellow, Jonathan Rapping who is a Professor of Law at Atlanta's John Marshall Law School and Harvard Law School. Mr. Rapping began the organization after witnessing countless citizens being inadequately represented due to the lack of support and resources given to well-meaning public defenders. In 2013, the organization and three of its heroic public defenders starred in the Emmy-nominated, HBO Documentary, *Gideon's Army*, which shed light on the many professional and personal challenges public defenders face as they try to provide quality representation to the poor.

The mission of Gideon's Promise is to mobilize a community that will effectively and zealously advocate for equal justice for the indigent impacted by the criminal justice system. We recruit, train and mentor public defenders working in under resourced communities across the country. Our main goal is to equip public defenders with the necessary tools to help repair the broken justice system which will ultimately end mass incarceration and keep families together. We also educate the community about the inner workings of the justice system and encourage them to play an active role in supporting public defenders.

In order for our organization to succeed in its mission, it is imperative that we involve the community in our efforts to support our most vulnerable citizens. Dr. Davis-Williams will assist us in our community outreach projects which include but are not limited to:

- Educating underserved communities in the metro-Atlanta area about the collateral consequences of a criminal conviction;
- Answering prisoner mail received from across the country
- Coordinating a Know Your Rights Campaign for Atlanta's youth
- Collaborating with community leaders about ways that Gideon's Promise can support them;
- Developing partnerships with key organizations interested in social justice
- Research and writing community improvement grants
- Assisting Development Coordinator in outreach event projects

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Gen. Counsel, NBA Players Association

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Tiffany Brown
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Education Consultant

Nelson Fernandez
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President/Founder
Jonathan Rapping
Professor, Atlanta's John Marshall Law School

Executive Director
Ilham Asikia

Dr. Davis-Williams volunteers at minimum 100 hours a month. Our very small staff is stretched thin, and we find it quite difficult to carry the workload without volunteer support. We are extremely pleased that Dr. Davis-Williams will be able to help us in our outreach efforts to educate people about the public defender crisis. If you have any questions, feel free to contact me any time at ilham@gideonspromise.org or 404.525.4505.

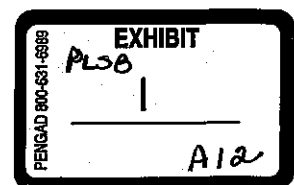
Sincerely,

A handwritten signature in black ink, appearing to read 'Ilham N. Askia', written over a horizontal line.

Ilham N. Askia
Executive Director

ADE EXHIBIT 1

EMAILS



From: Melissa Jacks (ADE)
To: Cheryl Reinhart (ADE)
Subject: Kerri Williams
Date: Friday, January 02, 2015 10:44:58 AM

Cheryl,

Sending you an application for adding an area by reciprocity because when Sandy looked her up on NASDTEC she has since had her Georgia license revoked. This license was revoked in August of 2014 while she held an Arkansas license.

Melissa Jacks

Program Support Manager
Educator Licensure Unit
Arkansas Department of Education
Four State Capitol Mall, Room 106B
Little Rock, AR 72201
501-682-4342
Melissa.Jacks@Arkansas.Gov
www.ArkansasEd.org



From: Cheryl Reinhart (ADE)
To: Melissa Jacks (ADE)
Subject: RE: Kerri Williams
Date: Friday, January 02, 2015 2:03:00 PM

NASDTEC information is that the license was revoked based on a criminal offense. We need to write to her and find out what the criminal offense was. I can send that letter and let you know the results. Until then, we don't need to go further with her license.

--Cheryl



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From: Melissa Jacks (ADE)
Sent: Friday, January 02, 2015 12:43 PM
To: Cheryl Reinhart (ADE)
Subject: RE: Kerri Williams

89608

Melissa Jacks

Program Support Manager
Educator Licensure Unit
Arkansas Department of Education
Four State Capitol Mall, Room 1068
Little Rock, AR 72201
501-682-4342
Melissa.Jacks@Arkansas.Gov
www.ArkansasEd.org



From: Kerri Williams (ADE)
To: Cheryl Reinhart (ADE)
Subject: Update
Date: Friday, January 30, 2015 12:05:04 PM

Mrs. Reinhart,

I wanted to update you on my progress with Georgia. I have spoken with them and they have given me instructions on the procedures for reversal of the revocation. I am in the process of completing the letter to them and I will keep you updated on the progress. If you have any questions please do not hesitate to contact me.

Thanks!

Kerri Williams, Ed.S.

School Improvement Specialist
Division of Public School Accountability
School Improvement Unit
Arkansas Department of Education
Four Capitol Mall, Mail Slot 26
Little Rock, AR 72201

Office: (501) 682-5250

Cell: (501) 366-1099

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From: Kerri Williams (ADE)
To: Cheryl Reinhart (ADE)
Subject: Update
Date: Wednesday, February 18, 2015 3:28:43 PM

Ms. Reinhart,

I wanted to update you on the status of my case in Georgia. They are allowing me to petition the commission to reapply for my certification. I have the packet 95% complete, I am waiting on letters of reference from my previous employers. I will give you a copy of the packet when it is complete. I am hoping to have it mailed by this weekend if weather permits. If you have any questions please do not hesitate to contact me.

Thank you,

Kerri Williams, Ed.S.

School Improvement Specialist
Division of Public School Accountability
School Improvement Unit
Arkansas Department of Education
Four Capitol Mall, Mail Slot 26
Little Rock, AR 72201

Office: (501) 682-5250

Cell: (501) 366-1099

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From: Kerri Williams (ADE)
To: Cheryl Reinhart (ADE)
Subject: Update
Date: Wednesday, March 04, 2015 9:55:15 AM

Good Morning,

I wanted to update you that I have sent the packet to Georgia and hopefully I will have an official update within the next few weeks.

Thanks!

Kerri Williams, Ed.S.

School Improvement Specialist
Division of Public School Accountability
School Improvement Unit
Arkansas Department of Education
Four Capitol Mall, Mail Slot 26
Little Rock, AR 72201

Office: (501) 682-5250

Cell: (501) 366-1099

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From: Kerri Williams (ADE)
To: Cheryl Reinhart (ADE)
Subject: Update from Georgia
Date: Monday, April 27, 2015 3:46:39 PM
Attachments: DOC042715-04272015154639.pdf

Ms. Reinhart,

I wanted to update you on the process of my packet that I sent in to Georgia. I received this letter Friday and will be going to have my fingerprints done today to send off for the report. Soon as I hear something I will let you know.

Kerri Williams, Ed.S.
School Improvement Specialist
Division of Public School Accountability
School Improvement Unit
Arkansas Department of Education
Four Capitol Mall, Mail Slot 26
Little Rock, AR 72201

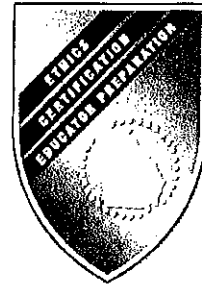
Office: (501) 682-5250
Cell: (501) 366-1099

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Protecting Georgia's Higher Standard of Learning

**Georgia Professional
Standards Commission**



April 16, 2015

Kerri Hendrix Williams
2005 Dakota Drive
North Little Rock, AR 72116

RE: Petition Package

Dear Ms. Williams:

The Professional Standards Commission (PSC) has received your documents petitioning for the right to reapply. Included in the packet was a consent form, which was signed to allow the PSC to obtain your Georgia criminal history report. However, other documentation is needed. In order to complete the process and provide the most comprehensive information to the PSC, it is necessary for you to provide this office with a FBI criminal history report as an out-of-state resident. Please visit the FBI website for directions in obtaining said report.

Feel free to contact the office should you have any questions.

Sincerely,


Tanis Miller
Legal Officer

From: Cheryl Reinhart (ADE)
To: "Kerri Williams (ADE)"
Subject: RE: Update from Georgia
Date: Wednesday, August 26, 2015 1:22:00 PM

Kerri, have you had your Georgia license reinstated yet?
Thanks ,
Cheryl

Cheryl L. Reinhart
Director, Professional Licensure Standards Board
Arkansas Department of Education
Four Capitol Mall, Box 30
Little Rock, AR 72201
501.352.6194 mobile
501.682.9983 office
501.682.3781 fax
Cheryl.Reinhart@arkansas.gov

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-----Original Message-----

From: Kerri Williams (ADE)
Sent: Monday, April 27, 2015 3:47 PM
To: Cheryl Reinhart (ADE)
Subject: Update from Georgia

Ms. Reinhart,
I wanted to update you on the process of my packet that I sent in to Georgia. I received this letter Friday and will be going to have my fingerprints done today to send off for the report. Soon as I hear something I will let you know.

Kerri Williams, Ed.S.
School Improvement Specialist
Division of Public School Accountability School Improvement Unit Arkansas Department of Education Four
Capitol Mall, Mail Slot 26 Little Rock, AR 72201

Office: (501) 682-5250
Cell: (501) 366-1099

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From: Kerri Williams
To: Cheryl Reinhart (ADE)
Subject: License
Date: Friday, September 04, 2015 10:47:05 AM

Good Morning,

I recieved the notification that my arkansas lincense will be revoked based on the issue with Georgia (that we hae been in communication about). I talked with Georgia today and my case will go before the board on October 8 and I should recieve notification with 5 business days of that meeting. Is there any way that we can hold off a little longer until I get things resolved with Goergia. The FBI criminal history that I had to do for them took 15 weeks from the date the FBI recieved it to get it back to Georgia. Any information you can provide me on how I should proceed I would greatly appreciate.

Thanks!

--

Kerri Williams, Ed.S.

School Improvement Specialist
Watson Chapel School District
4100 Camden Road
Pine Bluff, AR 71603
(870) 879-0220 - office
(870) 550-3236 - cell

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From: Cheryl Reinhart (ADE)
To: "Kerri Williams"
Subject: RE: License
Date: Tuesday, September 08, 2015 7:20:00 AM

Ms. Williams, I will reschedule this for the November 12 State Board meeting, and if this is cleared up by then, we will cancel that. However, as this has been lingering since at least January of this year, the Department is not inclined to extend it further.

Best regards,

Cheryl L. Reinhart

Director, Professional Licensure Standards Board
Arkansas Department of Education
Four Capitol Mall, Box 30
Little Rock, AR 72201
501.352.6194 mobile
501.682.9983 office
501.682.3781 fax
Cheryl.Reinhart@arkansas.gov

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From: Kerri Williams [mailto:kwilliams@wcmail.k12.ar.us]
Sent: Friday, September 04, 2015 10:47 AM
To: Cheryl Reinhart (ADE)
Subject: License

Good Morning,

I recieved the notification that my arkansas lincense will be revoked based on the issue with Georgia (that we hae been in communication about). I talked with Georgia today and my case will go before the board on October 8 and I should recieve notification with 5 business days of that meeting. Is there any way that we can hold off a little longer until I get things resolved with Goergia. The FBI criminal history that I had to do for them took 15 weeks from the date the FBI recieved it to get it back to Georgia. Any information you can provide me on how I should proceed I would greatly appreciate.

Thanks!

--

Kerri Williams, Ed.S.

School Improvement Specialist
Watson Chapel School District
4100 Camden Road

From: Kerri Williams
To: Cheryl Reinhart (ADE)
Subject: Re: License
Date: Tuesday, September 08, 2015 8:32:38 AM

I understand I had no idea Georgia would take this long to act. Thank you for your assistance.

On Tuesday, September 8, 2015, Cheryl Reinhart (ADE) <Cheryl.Reinhart@arkansas.gov> wrote:

Ms. Williams, I will reschedule this for the November 12 State Board meeting, and if this is cleared up by then, we will cancel that. However, as this has been lingering since at least January of this year, the Department is not inclined to extend it further.

Best regards,

Cheryl L. Reinhart

Director, Professional Licensure Standards Board

Arkansas Department of Education

Four Capitol Mall, Box 30

Little Rock, AR 72201

501.352.6194 mobile

501.682.9983 office

501.682.3781 fax

Cheryl.Reinhart@arkansas.gov

www.arkansased.org

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From: Kerri Williams
To: Cheryl Reinhart (ADE)
Subject: Re: License
Date: Thursday, October 08, 2015 2:13:41 PM

Ms. Reinhart,

I have received word from Georgia that they denied my right to reapply for my teaching license and it will remain revoked. I am not sure what to do at this point and how this affects my Arkansas license. Can you advise?

On Tue, Sep 8, 2015 at 7:20 AM, Cheryl Reinhart (ADE) <Cheryl.Reinhart@arkansas.gov> wrote:

Ms. Williams, I will reschedule this for the November 12 State Board meeting, and if this is cleared up by then, we will cancel that. However, as this has been lingering since at least January of this year, the Department is not inclined to extend it further.

Best regards,

Cheryl L. Reinhart

Director, Professional Licensure Standards Board

Arkansas Department of Education

Four Capitol Mall, Box 30

Little Rock, AR 72201

501.352.6194 mobile

501.682.9983 office

501.682.3781 fax

Cheryl.Reinhart@arkansas.gov

www.arkansased.org

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From: Cheryl Reinhart (ADE)
To: Kerri Williams
Subject: Re: License
Date: Thursday, October 08, 2015 2:28:53 PM

I think you will need to go forward with asking the State Board for a waiver.

--Cheryl

Cheryl L. Reinhart
Director, Professional Licensure Board
Arkansas Department of Education

Sent from my iPhone

On Oct 8, 2015, at 2:13 PM, Kerri Williams <kwilliams@wemail.k12.ar.us> wrote:

Ms. Reinhart,

I have received word from Georgia that they denied my right to reapply for my teaching license and it will remain revoked. I am not sure what to do at this point and how this affects my Arkansas license. Can you advise?

On Tue, Sep 8, 2015 at 7:20 AM, Cheryl Reinhart (ADE)
<Cheryl.Reinhart@arkansas.gov> wrote:

Ms. Williams, I will reschedule this for the November 12 State Board meeting, and if this is cleared up by then, we will cancel that. However, as this has been lingering since at least January of this year, the Department is not inclined to extend it further.

Best regards,

Cheryl L. Reinhart

Director, Professional Licensure Standards Board

Arkansas Department of Education

Four Capitol Mall, Box 30

Little Rock, AR 72201

501.352.6194 mobile

501.682.9983 office

501.682.3781 fax

Cheryl.Reinhart@arkansas.gov

From: Cheryl Reinhart (ADE)
To: [Kerri Williams \(kwilliams@wcmail.k12.ar.us\)](mailto:Kerri.Williams@wcmail.k12.ar.us)
Subject: FW: License
Date: Friday, October 16, 2015 4:54:00 PM

Ms. Williams, I am just following up with you about your license waiver request. As indicated in the email below, the hearing is scheduled for Thursday, November 12. You have already sent in your supporting documents. You will need to appear in person to speak to the Board. You are entitled to have an attorney represent you, but it is not required. If you plan to have any witnesses speak at the hearing, please send me their names before the hearing date.

Let me know if you have any questions.

Cheryl L. Reinhart

Director, Professional Licensure Standards Board
Arkansas Department of Education
Four Capitol Mall, Box 30
Little Rock, AR 72201
501.352.6194 mobile
501.682.9983 office
501.682.3781 fax
Cheryl.Reinhart@arkansas.gov

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From: Cheryl Reinhart (ADE)
Sent: Tuesday, September 08, 2015 7:21 AM
To: 'Kerri Williams'
Subject: RE: License

Ms. Williams, I will reschedule this for the November 12 State Board meeting, and if this is cleared up by then, we will cancel that. However, as this has been lingering since at least January of this year, the Department is not inclined to extend it further.

Best regards,

Cheryl L. Reinhart

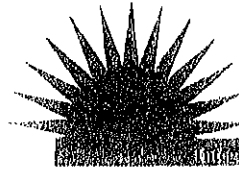
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Arkansas Department of Education
Four Capitol Mall, Box 30
Little Rock, AR 72201
501.352.6194 mobile
501.682.9983 office
501.682.3781 fax

ADE EXHIBIT 2

CORRESPONDENCE



ARKANSAS
DEPARTMENT
OF EDUCATION



Arkansas Professional
Licensure Standards Board

AELS CID: 89608

January 14, 2015

PERSONAL & CONFIDENTIAL

Ms. Kerri Williams
2005 Dakota Drive
North Little Rock, AR 72116

VIA REGULAR MAIL AND CERTIFIED MAIL

RETURN RECEIPT REQUESTED NO.: 91 7174 4441 7032 4718 5874

RE: License Revocation

Dear Ms. Williams:

At this time, your request to add an area to your Arkansas teaching license by reciprocity is denied. Our office has received information that Georgia revoked your teaching license in August 2014, and that the revocation was based on a criminal offense. Therefore, within fourteen (14) days of the date you receive this letter, please provide to this office documentation of the reason for the revocation of your license in Georgia, including the date and nature of the criminal offense involved. If we do not receive a response from you within that time, we will require a current background check.

If you have any questions, please feel free to contact me by phone at (501) 682-9983, or by email at Cheryl.Reinhart@arkansas.gov.

Sincerely,

Cheryl L. Reinhart
PLSB Director

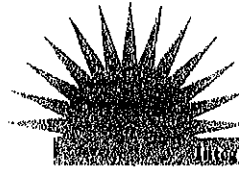
cc: Ivy Pfeffer, Asst. Commissioner, HR/Licensure/Educator Effectiveness
Karli Saracini, Director, Office of Educator Licensure

Arkansas Department of Education, Professional Licensure Standards Board
Four Capitol Mall Box 30, Little Rock, AR 72201
(501) 371-8014 voice (501) 682-3781 fax

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ARKANSAS
DEPARTMENT
OF EDUCATION



Arkansas Professional
Licensure Standards Board

AEELS CID: 89608

August 31, 2015

PERSONAL & CONFIDENTIAL

Ms. Kerri Williams
2005 Dakota Drive
North Little Rock, AR 72116

VIA REGULAR MAIL AND CERTIFIED MAIL
RETURN RECEIPT REQUESTED NO.: 91 7199 9991 7035 6965 3921

RE: License Revocation

Dear Ms. Williams:

As we have previously discussed, our office has received information that Georgia revoked your teaching license in August 2014, and that the revocation was based on a criminal offense. Under Arkansas Code Annotated § 6-17-413, the Department of Education issued you a standard teaching license by reciprocity, conditioned on your out-of-state license being in good standing.

Arkansas Code Annotated § 6-17-410 provides that the State Board may take action on a teaching license for the following cause:

Failing to establish or maintain the necessary requirements and standards set forth in Arkansas law or State Board rules and regulations for teacher licensure.

Therefore, on that basis, the Department will recommend that the State Board of Education **revoke your teaching license.**

Ark. Code Ann. § 6-17-410 entitles you to request a hearing before the State Board of Education regarding this action on your license. To request a hearing you must submit your written request to this office, by mail or by email, **within thirty (30) days** of the date you receive this letter. **If you do not sign for the certified letter and the letter sent by regular mail is not returned to this office, we will deem the letter received as of the tenth calendar day from the date of this letter.**

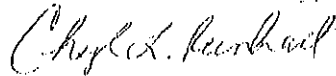
Arkansas Department of Education, Professional Licensure Standards Board
Four Capitol Mall Box 30, Little Rock, AR 72201
(501) 371-8014 voice (501) 682-3781 fax

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August 31, 2015

If you have any questions, please feel free to contact me by phone at (501) 682-9983, or by email at Cheryl.Reinhart@arkansas.gov.

Sincerely,



Cheryl L. Reinhart
PLSB Director

cc: Ivy Pfeffer, Asst. Commissioner for Educator Effectiveness/Licensure/Child Nutrition
Darrick Williams, Director/ Educator Licensure

*Arkansas Department of Education, Professional Licensure Standards Board
Four Capitol Mall Box 30, Little Rock, AR 72201
(501) 682-3303 main office; (501) 682-3781 fax*

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ADE EXHIBIT 3

GEORGIA LICENSE

Protecting Georgia's Higher Standard of Learning

Georgia Professional
Standards Commission



July 15, 2014

VIA CERTIFIED AND REGULAR U.S. MAIL

Ms. Kerri Eugenia Hendrix
1051 Pine Street
Arkadelphia, AR 71923

RE: Disciplinary Action before the Georgia Professional Standards Commission
Case # 12-7-72

Dear Ms. Hendrix:

The Professional Standards Commission (Commission) is charged with the investigation of matters involving violations of any law or the Code of Ethics by Georgia educators and the discipline of educators who violate the law or the code. The Commission is authorized, under O.C.G.A. §20-2-984.5(c), to recommend that an educator be warned, reprimanded, or monitored or that a certificate be suspended, denied or revoked. The grounds for disciplinary action by the Commission include Standard 1 (Legal Compliance), Standard 4 (Honesty), Standard 9 (Required Reports) and Standard 10 (Professional Conduct). See Rule 505-6-.01, Rules of the Professional Standards Commission.

The Commission conducted an investigation regarding an allegation that you violated the law, Georgia Department of Education Rules, or the Code of Ethics by the following action(s):

- Failure to report criminal conviction to the PSC

On July 10, 2014, the Commission found probable cause to believe that you breached the Code of Ethics and recommended that a sanction of **revocation** is appropriate. In response to the recommended sanction, you must do one of the following:

- request a hearing (Option A)
- sign the enclosed Consent Order (Option B)
- fail to respond within 30 days (Option C)

Option A

You are entitled to a hearing in this matter, before the Commission can take final action against your certificate. At the hearing, you may present evidence that disproves the allegation or mitigates the sanction. An administrative law judge (ALJ) from the Office of State Administrative Hearings

conducts the hearing and makes a recommendation in the form of an Initial Decision.

Ethics Division · 200 Piedmont Ave, Suite 1702 · Atlanta, Georgia · 30334-9032 · Phone (404) 232-2700 · Fax (404) 232-2720

If you desire a hearing in this matter, you must do two things:

- First, you must request in writing by a clear, written expression that you want the opportunity to contest the Commission's proposed sanction.
- Second, you must mail or fax (number below) the request to Nancy Teele, Professional Standards Commission, 200 Piedmont Avenue, Suite 1702, Atlanta, GA 30334-9032, within thirty (30) calendar days after service of this notice [Rule 505-6-.04]. *Service of this notice occurs on the date the notice was mailed by certified mail to the address you specified after receiving written notice of the investigation or to your last known address [Rule 505-6.03].* To meet the thirty (30) day deadline, your hearing request must be received (denoted by a "Received" date stamp) by the PSC no later than **August 14, 2014**.

Option B

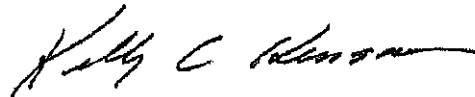
In lieu of a hearing, you may settle this matter with the enclosed Consent Order. You may wish to discuss the Consent Order with an attorney. If you accept the Consent Order, the matter can be concluded without the delay, time and expense of a formal hearing. The Commission must receive the signed Consent Order by no later than **August 14, 2014**, to meet the thirty (30) day deadline and for consideration at its **September 11, 2014**, meeting. **Return the original signed and notarized Consent Order to Nancy Teele (address below).** You may wish to keep a copy of the signed, notarized document for your personal records.

Option C

Failure to return the signed consent order or to request a hearing within the thirty (30) day time period shall operate as a waiver of your right to contest the proposed sanction. In such event, the proposed sanction will become the final decision of the Commission [Rule 505-6-.04].

If you or your attorney has questions, you may contact Nancy Teele at (404) 232-2631 or (800) 537-5996. The Ethics Division fax number is (404) 232-2720.

Sincerely,



Kelly C. Henson

KCH: nt

Enclosure



BEFORE THE GEORGIA PROFESSIONAL STANDARDS COMMISSION

STATE OF GEORGIA

IN THE MATTER OF:

Kerri Eugenia Hendrix,
Certificate # 648260

Respondent.

*
*
*
*
*
*

PSC NO. 12-7-72

CONSENT ORDER

By agreement of the Georgia Professional Standards Commission ("Commission") and Kerri Eugenia Hendrix ("Respondent"), the following disposition of this matter is entered pursuant to the provisions of the Georgia Administrative Procedure Act, codified as O.C.G.A. §50-13-13(a)(4).

FINDINGS OF FACT

The Respondent holds a certificate issued by the Georgia Professional Standards Commission and held such certificate during times relevant to the matters asserted herein.

2.

The Respondent was arrested for felony Theft by Taking in 2008 and sentenced to two (2) years' probation under the first offender program in March 2009. The Respondent failed to report the offense or the sentence to the Commission. The Respondent resigned from her employing school system when her criminal history was disclosed.

CONDITIONS OF REVOCATION

1.

Respondent, holder of Certificate # 648260 to practice as an educator in the State of Georgia pursuant to Chapter 2 of Title 20 of the Official Code of Georgia Annotated, hereby freely, knowingly and voluntarily agrees to this Consent Order by the Georgia Professional Standards Commission. Respondent hereby acknowledges that this is a revocation of her certificate. Respondent knowingly forfeits and relinquishes all right, title and privilege of

holding herself out as and being able to practice as an educator in the public schools in the State of Georgia, unless and until such time as her certificate may be reinstated or a new certificate issued. Respondent shall not serve as a volunteer or be employed as an educator, paraprofessional, aide, substitute teacher, or in any other position in a public school in the State of Georgia. Respondent will not seek or accept employment or any service position in any agency serving children under the age of 18.

2.

Respondent shall not be eligible to petition to apply for a new certificate or reinstatement until three (3) years from the effective date of this revocation. Respondent understands and agrees that the decision to reinstate or reissue a certificate will be within the sole discretion of the Commission. Respondent also understands and agrees that should the Commission consider a petition to apply for a new certificate, the Commission shall have access to the entire investigative file in this matter.

3.

Approval of this Consent Order by the Georgia Professional Standards Commission shall in no way be construed as condoning Respondent's conduct and shall not be construed as a waiver of any lawful rights possessed by the Commission.

4.

This Consent Order shall not become effective unless and until approved by the Georgia Professional Standards Commission, at which time it shall become effective immediately.

5.

Respondent acknowledges that she has read this Consent Order and understands the terms and sanctions described herein. Respondent understands and agrees that the Commission shall have the authority to review the investigative file and all relevant evidence in considering the Consent Order. Respondent further understands that this Consent Order, once approved, shall constitute a public record that may be disseminated as a disciplinary action of the Commission. If this Consent Order is not approved, it shall not constitute an admission against interest in this proceeding or prejudice the ability of the commission to adjudicate this matter. Respondent hereby consents to the terms and sanctions contained herein.

[SIGNATURES FOLLOW ON NEXT PAGE]

CONSENTED TO:

KERRI EUGENIA HENDRIX
Respondent

Sworn to and subscribed before me

this _____ day of _____, _____.

NOTARY PUBLIC

My Commission expires:

SO ORDERED, this _____ day of _____, _____.

APPROVED:

GEORGIA PROFESSIONAL
STANDARDS COMMISSION

BY:

PENNY L. ELKINS, Ph.D.
Chairperson

ATTEST:

KELLY C. HENSON
Executive Secretary

[Log Out](#)[Clearinghouse](#) [NASDTEC Home](#) [Help Desk](#) [Feedback](#)**CERT ID SEARCH RESULTS****ARKANSAS DEPARTMENT OF EDUCATION - RECORD MATCH****[CANCEL](#)****Instructions**

A single record was found that matched the Certification ID you have entered. Please review the record information at right and verify this is the same person. If it is not, press **CANCEL** and recheck the Certification ID.

All actions recorded for this person are listed below the name information. Clicking on an action link will generate a complete Clearinghouse for this Certification ID record.

Certification ID **431673109**

First Name KERRI
Last Name HENDRIX
Middle Name/Initial EUGENIA
Maiden Name
Date of Birth 09/15/1976
mm/dd/yyyy

Clearinghouse Actions

Action Type	Jurisdiction	Transaction Date	Date of Action
Revocation/Invalidation	GA	08/20/2014	08/20/2014
Denial	GA	10/08/2015	10/08/2015

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[Log Out](#)

[Clearinghouse](#) [NASDTEC Home](#) [Help Desk](#) [Feedback](#)
[Return](#) | [Search Index](#)
Certification ID **431673109**
First Name **KERRI**
Last Name **HENDRIX**
Middle Name/Initial **EUGENIA**
Maiden Name
Date of Birth **09/15/1976**
 mm/dd/yyyy

Action Date **08/20/2014**
Effective Date **08/20/2014**
Transaction Date **08/20/2014**
Jurisdiction **GEORGIA**
License Type **Not employed as an educator at time of action**
Grade Classification
Action Type **Revocation/Invalidation**
Action Details
YES **Is the reported action based on a criminal conviction(s)?**
Type **Theft Related**
NO **Is the action based upon sexual misconduct that did not result in a criminal conviction?**
NO **Is the action based upon non-sex related acts or crimes committed against a child?**
NO **Is the action based upon a drug or alcohol related misconduct?**
NO **Is the action based upon any manner of test or document fraud?**
NO **Is the action based upon the misuse of school computers or other equipment?**
NO **Is the action based upon fiscal impropriety?**
NO **Is the action based upon educator employment contract violation?**
NO **Is the action based upon the failure to repay a debt owed covered by state statute (e.g. default on student loan, child support)?**
NO **Is the action based upon an action taken in another jurisdiction?**



Certification ID 431673109

First Name KERRI

Last Name HENDRIX

Middle Name/Initial EUGENIA

Surname

Date of Birth 09/15/1976
mm/dd/yyyy

Action Date 10/08/2015

Effective Date 10/08/2015

Transaction Date 10/08/2015

Jurisdiction GEORGIA

License Type Classroom teacher - art, music, PE, drama

Grade Classification Middle/Junior High School

Action Type Denial

Action Details

- YES Is the reported action based on a criminal conviction(s)?
- Type Theft Related
- NO Is the action based upon sexual misconduct that did not result in a criminal conviction?
- NO Is the action based upon non-sex related acts or crimes committed against a child?
- NO Is the action based upon a drug or alcohol related misconduct?
- NO Is the action based upon any manner of test document fraud?
- NO Is the action based upon the misuse of school computers or other equipment?
- NO Is the action based upon fiscal impropriety?
- NO Is the action based upon educator employment contract violation?
- NO Is the action based upon the failure to repay a debt owed covered by state statute (e.g. default on student loan, child support)?
- NO Is the action based upon an action taken in another jurisdiction?

ADE EXHIBIT 4

ARKANSAS LICENSE

PLAF

MAIL TO:
EDUCATOR LICENSURE
DEPARTMENT OF EDUCATION
ROOMS 106B & 107B
FOUR CAPITOL MALL
LITTLE ROCK, AR 72201-1071



APPLICATION FOR EDUCATOR'S LICENSE

Arkansas

DEPARTMENT OF EDUCATION
Educator Licensure

84608

Telephone No: (501) 682-4342

Fax No: (501) 682-4898

Web Page: www.arkansased.org

NOTICE

Incomplete applications will be returned
without action, with omissions checked.

F A CR

PLEASE PRINT IN INK OR TYPE

Central Registry Check:		All coursework must be documented by providing original college transcripts:	Applicable Fees:
<input type="checkbox"/> Being Forwarded To DHS	<input type="checkbox"/> On File		
Non Criminal Background Check:		<input type="checkbox"/> Enclosed <input type="checkbox"/> Being Forwarded <input type="checkbox"/> On File	<input type="checkbox"/> Enclosed <input type="checkbox"/> Pay Online
<input type="checkbox"/> Being Forwarded To AR State Police	<input type="checkbox"/> On File		

Date: 12/19/14

Date of Birth: 9/15/76

SSN: 431-67-3109

Name: Kerri

Eugenia

Williams

Hendrix

First

Middle

Last

Maiden

Mail License To: Kerri Williams

Home Phone: _____

Cellular Phone: _____

Work Phone: _____

Fax: _____

Email: _____

2005 Dakota DR

Street and/or Route Number

Apartment #

North Little Rock

City

AR 72116

State

Zip

Years of Licensed Teaching Experience: _____

FOR STATISTICAL PURPOSES ONLY: Gender: <input type="checkbox"/> Male <input checked="" type="checkbox"/> Female Ethnicity: Check One <input type="checkbox"/> Hispanic / Latino <input checked="" type="checkbox"/> Non-Hispanic / Latino Race: Check one or more <input type="checkbox"/> American Indian Or Alaskan Native <input type="checkbox"/> Asian or Pacific Islander <input checked="" type="checkbox"/> Black or African American <input type="checkbox"/> White <input type="checkbox"/> Native Hawaiian or Other Pacific Islander <input type="checkbox"/> Other	PROCESSING FEE CHECK ONE (IF APPLICABLE) <input type="checkbox"/> \$75 - 5 YEAR STANDARD <input type="checkbox"/> \$75 - 5 YEAR RENEWAL <input type="checkbox"/> \$50 - DUPLICATE <input type="checkbox"/> \$75 - 5 YEAR TECHNICAL PERMIT PLEASE NOTE: NO PERSONAL CHECKS ACCEPTED: Money orders or cashier checks only. Educators can pay on-line by credit card or electronic check at https://www.ark.org/teachers/licensure	Have you ever held an Arkansas teaching license? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Have you ever had a license revoked in any state? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Have you ever had a "true finding" with the Arkansas Department of Human Services Child Maltreatment Central Registry? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes, what was the finding? _____ Have you ever pled guilty or pled nolo contendere (no contest) or been found guilty of a crime? <input type="checkbox"/> Yes <input type="checkbox"/> No If yes, was the crime a <input type="checkbox"/> Felony or <input type="checkbox"/> Misdemeanor What was the date and crime for which you were convicted? _____ Is your license currently under disciplinary review? <input type="checkbox"/> Yes <input type="checkbox"/> No
	RECEIVED DEC 22 2014	

Please be aware that the Arkansas Department of Education has access to and must consider any background check reflecting a conviction (pleading guilty or nolo contendere (no contest) or being found guilty by a jury or judge) for any offense listed in Ark. Code Ann. § 6-17-410 as well as any felony involving physical or sexual injury, mistreatment, or abuse against another, including records that have been expunged, sealed or subject to a pardon. For any questions about this, please call the ADE legal office @ (501) 682-4227.

Please indicate the application type.

<input type="checkbox"/> Provisional	<input type="checkbox"/> Non-Traditional (APPEL)	<input type="checkbox"/> Converting Initial to Standard	<input type="checkbox"/> Duplicate
<input type="checkbox"/> Standard	<input type="checkbox"/> Non-Traditional MAT/MED/MTLL	<input type="checkbox"/> Converting Provisional to Standard	<input checked="" type="checkbox"/> Name Change
<input type="checkbox"/> Reciprocity	<input type="checkbox"/> Teach for America	<input type="checkbox"/> Career & Technical Permit	<input type="checkbox"/> Correction
<input type="checkbox"/> Renewal	<input type="checkbox"/> Teacher Corps	<input checked="" type="checkbox"/> Adding Degree	<input type="checkbox"/> Change of Address Only
<input type="checkbox"/> Lifetime License	<input type="checkbox"/> Professional Teaching Permit	<input checked="" type="checkbox"/> Adding an Area	
	<input type="checkbox"/> Provisional Professional Teaching License		

Please indicate the degree level of your license.

<input type="checkbox"/> Less than Bachelor's	<input type="checkbox"/> Bachelor's	<input type="checkbox"/> Master's	<input checked="" type="checkbox"/> Specialist	<input type="checkbox"/> Doctorate
To be completed by applicant only when adding an additional licensure area by testing.				
Licensure Area(s)		Grade Level		
Educational Leadership		P-12		

Signature of Applicant: Kerri Williams

07/01/2013



ADK ANICAC

DEPARTMENT OF EDUCATION

EDUCATOR'S LICENSE

KERRI EUGENIA WILLIAMS

MASTERS

CODE	AREA	TYPE	GRADE LEVEL	VALID FROM	VALID TO
082	SECONDARY PHYSICAL EDUCATION	STANDARD	7 - 12	1/1/2014	12/31/2018
085	ELEMENTARY PHYSICAL EDUCATION	STANDARD	K - 6	1/1/2014	12/31/2018
086	MIDDLE SCHOOL PHYSICAL EDU	STANDARD	5 - 8	1/1/2014	12/31/2018
087	COACHING	STANDARD	7 - 12	1/1/2014	12/31/2018
271	COACHING	STANDARD	K - 12	1/1/2014	12/31/2018

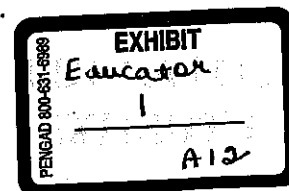
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COMMISSIONER OF EDUCATION

DIRECTOR - EDUCATOR LICENSURE

Timeline of Events for Kerri Williams

- July 2004 – Began working in Cobb County School District in Georgia
- July 2008 – Arrest occurred
- March 2009 – Petition for First Offenders Act and placed on probation for 2 years (attachment 1)
- July 20, 2011 – Completed all requirements of the court and received an order of discharge from the courts (attachment 2)
- July 2012 – Left Georgia to return back to Arkansas at Assistant Professor at Henderson State University
- October, 2012 - Notified by Investigator Langston Jackson, Georgia Professional Standards Commission that a complaint had been filed against my license. Informed me that I needed to send a letter explaining the arrest from 2008. (attachment 3)
- October 9, 2012 – Sent Investigator Jackson email regarding complaint with letter attached and court documents
- October 9, 2012 – Investigator Jackson replied that he had received all information.
- December 11, 2013 – I applied to have my GA license renewed
- December, 2013 – Interviewed for a School Improvement position at ADE
- January 2014 – Offered position at ADE and applied for teaching license
- January 15, 2014 – Spoke to Cheryl Reinhart regarding background check and submitted court documentation (attachment 4)
- January, 22, 2014 – Began working at ADE
- February, 2014 – Arkansas issued my Arkansas teaching license
- February 7, 2014 – Received an email from the professional standards commission ethics division that I did not need to answer “yes” on personal affirmation question #7. (attachment 5)
- February 7, 2014 – Responded with the request from the ethics division (attachment 6)
- March 26, 2014 – Georgia License were issued and renewed until 6/30/2018
- July 15, 2014 – Letter from Georgia Professional Standards Commission (never received-moved to a new address in June, 2014) (attachment 7)
- January 14, 2015 – Notified from ADE that my request for reciprocity is denied due to Georgia revoking my license on August, 20, 2014 (attachment 8)
- January 28, 2015 – Contacted Georgia Ethics Division regarding steps to appeal the decision and remove the revocation. (attachment 9)
- February 13, 2015 – Issued a letter to the Commissioner at Georgia Professional Standards Commission for a rule waiver request (attachment 10)
- February 28, 2015 – The Commissioner allowed me to request a rule waiver and the packet was sent to Georgia Professional Standards Commission.



- March 19, 2015 – Contacted the Ethics division on the status of my packet (attachment 11)
- October 8, 2015 – Received notification that the Professional Standards Commission denied my waiver to reapply for my Georgia license (attachment 12)

GEORGIA DEPARTMENT OF CORRECTIONS
PROBATION DIVISION

STATE OF GEORGIA

Vs

Kerri Eugenia Hendrix

SID# GA3661971A

DOB: 9/15/76

SS# 431-67-3109

Arrest Date: 06/28/08

Docket No. 08-5931-05

County of Cobb

In the Superior Court

PETITION FOR DISCHARGE OF DEFENDANT (FIRST-OFFENDER ACT)

COMES NOW THE undersigned Anitra Gilford and respectfully states to this Honorable Court that Kerri Eugenia Hendrix was on the 10th day of March, 2009 Placed on probation with said defendant's consent under the provisions of the Act for Probation of First Offenders, as specified in the Official Code of Georgia, and with further proceedings being deferred in accordance with said Act for a period of 2 YEARS.

THE DEFENDANT being eligible for discharge as shown by having fulfilled the terms of said probation and upon review of the Defendant's criminal record as on file with Georgia Crime Information Center (attached hereto):

WHEREFORE, it is respectfully requested that the above named defendant be discharged under the provisions of said Act.

This 20th day of July, 2011.



Anitra Gilford
PROBATION OFFICER

ORDER OF DISCHARGE

WHEREAS the above named defendant, having been placed on probation on the 10th day of March, 2009 for a period of 2 Years in accordance with the provisions of the Probation for First-Offenders Act, as specified in the Official Code of Georgia, without an adjudication of guilt, and...

WHEREAS, this Court having been petitioned by the Defendant's Probation Officer and having reviewed the Defendant's criminal record showing eligibility for sentencing;

WHEREFORE IT IS ORDERED AND DIRECTED that in accordance with the provision of the Probation of First-Offenders Act as specified in the Official Code of Georgia:

- A. The defendant be discharged without court adjudication of guilt.
- B. That this discharge shall completely exonerate the defendant of any criminal purpose.
- C. That this discharge shall not affect any of said defendant's civil rights or liberties.
- D. The defendant shall not be considered to have a criminal conviction.
- E. This discharge may not be used to disqualify a person in any application for employment or appointment to office in either the public or private sector by reason of criminal conviction unless otherwise permitted by law.

IT IS FURTHER ORDERED AND DIRECTED that the Georgia Crime Information Center be notified of said discharge in accordance with the provisions of said Act as Amended.

ORDERED THIS 26th day of July, 2011

JUDGE Dorothy Robinson
COURT, COBB SUPERIOR

Court Rules
Clerk of Superior Court, Cobb County
www.cobbcountyga.com
Jay C. Stephenson

Filed In Office Aug-11-2011 10:12:52
ID# 2011-0098264-CR
Page 1

EDUCATOR
EXHIBIT 2



IN THE SUPERIOR COURT OF COBB COUNTY
STATE OF GEORGIA

STATE OF GEORGIA

INDICTMENT NO. 08-9-5931-05

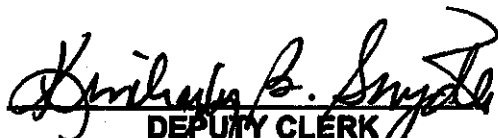
VS.

Kerri Eugenia Hendrix

DISCHARGE FILED COMPLETELY EXONERATES THE DEFENDANT OF ANY CRIMINAL PURPOSE AND SHALL NOT AFFECT ANY OF HIS/HER CIVIL RIGHTS OR LIBERTIES, EXCEPT FOR REGISTRATION REQUIREMENTS UNDER THE STATE SEXUAL OFFENDER REGISTRY; AND EXCEPT WITH REGARD TO EMPLOYMENT PROVIDING CARE FOR MINOR CHILDREN OR ELDERLY PERSONS AS SPECIFIED IN CODE SECTION 42-8-63.1; AND THE DEFENDANT SHALL NOT BE CONSIDERED TO HAVE A CRIMINAL CONVICTION O.C.G.A. 42-8-62.

DATE: 8/11/11

JAY C. STEPHENSON
CLERK, SUPERIOR COURT


DEPUTY CLERK
COBB SUPERIOR COURT

EDUCATOR
EXHIBIT 3

2

Subject: RE: Letter of Explanation for Kerri Hendrix
From: Langston Jackson (Langston.Jackson@GAPSC.com)
To: kerrihj@yahoo.com;
Date: Tuesday, October 9, 2012 11:38 AM

Thank you, I will place this in your file.

Langston M. Jackson, Investigator
Georgia Professional Standards Commission
Educator Ethics Division
404-232-2634 Office
404-232-2720 Fax

From: Kerri Hendrix-Jackson [mailto:kerrihj@yahoo.com]
Sent: Tuesday, October 09, 2012 12:31 PM
To: Langston Jackson
Subject: Letter of Explanation for Kerri Hendrix

Mr. Jackson,
Attached is the letter of explanation in regards to my case.
Kerri Hendrix

EDUCATOR
EXHIBIT 4

Home Mail Search News Sports Finance Weather Games Answers Screen Flickr Mobile Upgrade to the new Firefox v Search Mail Search Web Home Kerri



Compose

Search results Delete Move Sort More

Inbox (157)

Drafts

Sent

Spam (536)

Trash

> Folders

> Smart Views

Unread

Starred

People

Social

Travel

Shopping

Finance

> Recent

RE: Kerri Jackson

Cheryl Reinhart (ADE)

Jan 15, 2014

To me

Thank you. I've received both pages and am reviewing them now.
--Cheryl

Cheryl L. Reinhart

Attorney, Ethics & Licensure

Arkansas Department of Education

Professional Licensure Standards Board

Four Capitol Mall, Box 30

Little Rock, AR 72201

501.682.9983 direct line

501.682.3781 fax

Cheryl.Reinhart@arkansas.gov

Sponsored



First Time Ever
Absolute Zero
\$0 Fed \$0 State
\$0 to File
TurboTax.com

From: kerrihj@yahoo.com [<mailto:kerrihj@yahoo.com>]

Sent: Wednesday, January 15, 2014 11:54 AM

To: Cheryl Reinhart (ADE)

Subject: Kerri Jackson

Attached

Sent via the Samsung Galaxy Mega™, an AT&T 4G LTE smartphone

EDUCATOR
EXHIBIT 5

1/26/2015

4 <https://us-mg6.mail.yahoo.com/neo/launch?.rand=5gj7blh5u25q1>

Subject: *PSC Requested Information* ACTION REQUIRED...

From: Jennifer Cobb (jennifer.cobb@GAPSC.com)

To: kerrihj@yahoo.com;

Cc: Langston.Jackson@GAPSC.com;

Date: Friday, February 7, 2014 9:35 AM

Good morning Ms. Hendrix,

I am with the Professional Standards Commission Ethics Division. I see on an application dated **December 11, 2013** that you answered "YES" to Personal Affirmation question #7. A "YES" answer automatically starts a new investigation but I also see that there has been a previous investigation conducted by the PSC regarding your certification. The application states that you should not include matters that the PSC has investigated or is investigating. Before beginning a new investigation I would like to ask: what is the nature of this "YES" answer, are you reporting a new offense or is this in reference to the matter that the PSC has previously investigated?

If you could *please reply back TO THIS EMAIL* with a statement clarifying this situation it would be greatly appreciated. Please feel free to call or email me if you have any questions regarding this matter.

Regards,

Jennifer Cobb, Legal Secretary

Georgia Professional Standards Commission

Ethics Division

200 Piedmont Avenue, Suite 1702

Atlanta, GA 30334-9032

404-232-2652 (desk)

404-232-2720 (fax)

jennifer.cobb@gapsc.com

**EDUCATOR
EXHIBIT 6**

Subject: RE: *PSC Requested Information* ACTION REQUIRED...
From: Jennifer Cobb (jennifer.cobb@GAPSC.com)
To: kerrihj@yahoo.com;
Date: Friday, February 7, 2014 10:12 AM

Thank you Ms. Hendrix, I will include this information with your file.

Please be advised that the application states above the affirmation questions DO NOT include matters that the PSC has investigated or is currently investigating. So unless you are making us aware of a new situation, please mark "NO" on your future application. Thank you.

Best regards,

Jennifer Cobb, Legal Secretary

Georgia Professional Standards Commission

Ethics Division

jennifer.cobb@gapsc.com

From: Kerri Hendrix-Jackson [mailto:kerrihj@yahoo.com]
Sent: Friday, February 07, 2014 11:02 AM
To: Jennifer Cobb
Subject: Re: *PSC Requested Information* ACTION REQUIRED...

It was from an arrest in 2008 that was investigated by Mr. Jackson at GPSC. I wasn't for sure to mark it or not mark it because I knew you had it on file and I didn't want to "lie" about anything. If you need any other information please let me know. It was handled through First Offenders Act and there was not guilty or admission to guilt in the pleading.

From: Jennifer Cobb <jennifer.cobb@GAPSC.com>
To: "kerrihj@yahoo.com" <kerrihj@yahoo.com>
Cc: Langston Jackson <Langston.Jackson@GAPSC.com>
Sent: Friday, February 7, 2014 9:24 AM
Subject: *PSC Requested Information* ACTION REQUIRED...

**EDUCATOR
EXHIBIT 7**

Protecting Georgia's Higher Standard of Learning

**Georgia Professional
Standards Commission**



July 15, 2014

VIA CERTIFIED AND REGULAR U.S. MAIL

Ms. Kerri Eugenia Hendrix
1051 Pine Street
Arkadelphia, AR 71923

RE: Disciplinary Action before the Georgia Professional Standards Commission
Case # 12-7-72

Dear Ms. Hendrix:

The Professional Standards Commission (Commission) is charged with the investigation of matters involving violations of any law or the Code of Ethics by Georgia educators and the discipline of educators who violate the law or the code. The Commission is authorized, under O.C.G.A. §20-2-984.5(c), to recommend that an educator be warned, reprimanded, or monitored or that a certificate be suspended, denied or revoked. The grounds for disciplinary action by the Commission include Standard 1 (Legal Compliance), Standard 4 (Honesty), Standard 9 (Required Reports) and Standard 10 (Professional Conduct). See Rule 505-6-.01, Rules of the Professional Standards Commission.

The Commission conducted an investigation regarding an allegation that you violated the law, Georgia Department of Education Rules, or the Code of Ethics by the following action(s):

- Failure to report criminal conviction to the PSC

On July 10, 2014, the Commission found probable cause to believe that you breached the Code of Ethics and recommended that a sanction of **revocation** is appropriate. In response to the recommended sanction, you must do one of the following:

- request a hearing (Option A)
- sign the enclosed Consent Order (Option B)
- fail to respond within 30 days (Option C)

Option A

You are entitled to a hearing in this matter, before the Commission can take final action against your certificate. At the hearing, you may present evidence that disproves the allegation or mitigates the sanction. An administrative law judge (ALJ) from the Office of State Administrative Hearings

**EDUCATOR
EXHIBIT 8**

conducts the hearing and makes a recommendation in the form of an Initial Decision.

Ethics Division • 200 Piedmont Ave, Suite 1702 • Atlanta, Georgia • 30334-9032 • Phone (404) 232-2700 • Fax (404) 232-2720

If you desire a hearing in this matter, you must do two things:

- First, you must request in writing by a clear, written expression that you want the opportunity to contest the Commission's proposed sanction.
- Second, you must mail or fax (number below) the request to Nancy Teele, Professional Standards Commission, 200 Piedmont Avenue, Suite 1702, Atlanta, GA 30334-9032, within thirty (30) calendar days after service of this notice [Rule 505-6-.04]. *Service of this notice occurs on the date the notice was mailed by certified mail to the address you specified after receiving written notice of the investigation or to your last known address [Rule 505-6.03].* To meet the thirty (30) day deadline, your hearing request must be received (denoted by a "Received" date stamp) by the PSC no later than **August 14, 2014**.

Option B

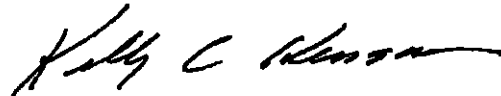
In lieu of a hearing, you may settle this matter with the enclosed Consent Order. You may wish to discuss the Consent Order with an attorney. If you accept the Consent Order, the matter can be concluded without the delay, time and expense of a formal hearing. The Commission must receive the signed Consent Order by no later than **August 14, 2014**, to meet the thirty (30) day deadline and for consideration at its **September 11, 2014**, meeting. **Return the original signed and notarized Consent Order to Nancy Teele (address below).** You may wish to keep a copy of the signed, notarized document for your personal records.

Option C

Failure to return the signed consent order or to request a hearing within the thirty (30) day time period shall operate as a waiver of your right to contest the proposed sanction. In such event, the proposed sanction will become the final decision of the Commission [Rule 505-6-.04].

If you or your attorney has questions, you may contact Nancy Teele at (404) 232-2631 or (800) 537-5996. The Ethics Division fax number is (404) 232-2720.

Sincerely,



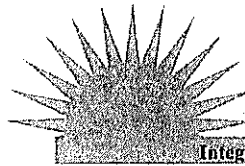
Kelly C. Henson

KCH: nt

Enclosure



ARKANSAS
DEPARTMENT
OF EDUCATION



Arkansas Professional
Licensure Standards Board
Integrity ■ Knowledge ■ Professionalism

AELS CID: 89608

January 14, 2015

PERSONAL & CONFIDENTIAL

Ms. Kerri Williams
2005 Dakota Drive
North Little Rock, AR 72116

VIA REGULAR MAIL AND CERTIFIED MAIL

RETURN RECEIPT REQUESTED NO.: 91 7199 9991 7032 4718 5874

RE: License Revocation

Dear Ms. Williams:

At this time, your request to add an area to your Arkansas teaching license by reciprocity is denied. Our office has received information that Georgia revoked your teaching license in August 2014, and that the revocation was based on a criminal offense. Therefore, within fourteen (14) days of the date you receive this letter, please provide to this office documentation of the reason for the revocation of your license in Georgia, including the date and nature of the criminal offense involved. If we do not receive a response from you within that time, we will require a current background check.

If you have any questions, please feel free to contact me by phone at (501) 682-9983, or by email at Cheryl.Reinhart@arkansas.gov.

Sincerely,

Cheryl L. Reinhart
PLSB Director

cc: Ivy Pfeffer, Asst. Commissioner, HR/Licensure/Educator Effectiveness
Karli Saracini, Director, Office of Educator Licensure

Arkansas Department of Education, Professional Licensure Standards Board
Four Capitol Mall Box 30, Little Rock, AR 72201
(501) 371-8014 voice (501) 682-3781 fax

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EDUCATOR
EXHIBIT 9

Subject: RE: *PSC Requested Information* ACTION REQUIRED...
From: Jennifer Cobb (jennifer.cobb@GAPSC.com)
To: kerrihj@yahoo.com;
Date: Wednesday, January 28, 2015 1:04 PM

Ms. Hendrix,

I will contact you at about 4:15. I am in the middle of a few things but I will be happy to explain to you what steps you would need to take to try and rectify this matter.

Regards,

Jennifer Cobb, Legal Secretary

Georgia Professional Standards Commission

Ethics Division

jennifer.cobb@gapsc.com

From: Kerri Hendrix-Jackson [mailto:kerrihj@yahoo.com]
Sent: Wednesday, January 28, 2015 1:59 PM
To: Jennifer Cobb
Subject: Re: *PSC Requested Information* ACTION REQUIRED...

I am not sure if you attempted to call me. If so I am currently in a meeting and can return your call in about an hour.

Kerri Hendrix

From: Kerri Hendrix-Jackson <kerrihj@yahoo.com>
To: Jennifer Cobb <jennifer.cobb@GAPSC.com>
Sent: Wednesday, January 28, 2015 11:53 AM
Subject: Re: *PSC Requested Information* ACTION REQUIRED...

Ms. Cobb,

**EDUCATOR
EXHIBIT 10**

Good afternoon I would like to speak with you regarding steps that I can take regarding the revocation of my license. I am contacting you because of communication that we had previously when I received my renewed license. That communication is in the below portion of the email. I have also reached out to the investigator that was assigned to my case, Mr. Jackson and he has not responded to my voicemail or emails. My license was revoked in August 2014. GAPSC sent me a certified letter that I never received due to me not living in Georgia anymore. Because I did not receive the letter with a 14 day deadline I had no knowledge that I was to appear regarding the revocation of my license. I am trying to figure out what steps I can take to get this changed based on the circumstances. This is currently impacting my current license that I hold in Arkansas. Please provide me with any information that you have so I can proceed to get this issue resolved. I appreciate any information you can give me.

Thanks

Kerri Hendrix (501) 218-6392

From: Kerri Hendrix-Jackson <kerrihj@yahoo.com>
To: Jennifer Cobb <jennifer.cobb@GAPSC.com>
Sent: Friday, February 7, 2014 10:34 AM
Subject: Re: *PSC Requested Information* ACTION REQUIRED...

OK thank you for the information.

From: Jennifer Cobb <jennifer.cobb@GAPSC.com>
To: Kerri Hendrix-Jackson <kerrihj@yahoo.com>
Sent: Friday, February 7, 2014 10:12 AM
Subject: RE: *PSC Requested Information* ACTION REQUIRED...

Thank you Ms. Hendrix, I will include this information with your file.

Please be advised that the application states above the affirmation questions DO NOT include matters that the PSC has investigated or is currently investigating. So unless you are making us aware of a new situation, please mark "NO" on your future application. Thank you.

Best regards,

Jennifer Cobb, Legal Secretary
Georgia Professional Standards Commission
Ethics Division
jennifer.cobb@gapsc.com

From: Kerri Hendrix-Jackson [<mailto:kerrihj@yahoo.com>]
Sent: Friday, February 07, 2014 11:02 AM
To: Jennifer Cobb
Subject: Re: *PSC Requested Information* ACTION REQUIRED...

It was from an arrest in 2008 that was investigated by Mr. Jackson at GPSC. I wasn't for sure to mark it or not mark it because I knew you had it on file and I didn't want to "lie" about anything. If you need any other information please let me know. It was handled through First Offenders Act and there was not guilty or admission to guilt in the pleading.

9

Date: February 13, 2015

Ms. Kerri Hendrix (Williams)
2005 Dakota Drive
North Little Rock, AR 72116

To: Commissioner, Georgia Professional Standards
Georgia Professional Standards Commission – Educator Ethics Division
200 Piedmont Avenue Suite 1702
Atlanta, Georgia 30334-9032

Re: Rule Waiver Request

Dear Commissioner,

I am writing this letter to have the rule 505-6-.02 Section 3 (b) regarding the three year waiting period waived. I was notified on January 14, 2015 from my current employer that my educator license in Georgia was revoked. When I contacted Georgia Professional Standards Commission regarding this information I was informed that I failed to respond to a notice that was sent to me on July 15, 2014 via certified mail. In August 2014, my license was revoked due to a nonresponse of the probable cause letter.

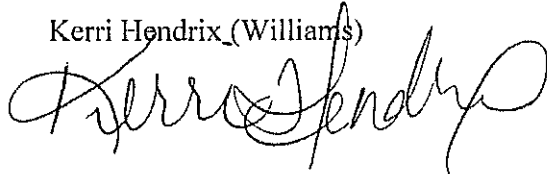
In July, 2012 I relocated from Douglasville, GA to Arkadelphia, AR for a new job opportunity. During the time span from October 2012 to February 2014 I was in communication with Investigator Langston Jackson regarding the investigation for failure to report an arrest from 2008. I had submitted the required documentation via email and spoke with him via telephone. The last communication that was received from Investigator Jackson in 2014 he stated that he would notify me of any updates. As of today I have not been able to contact investigator Jackson. During this time I had my Georgia license renewed and the new license was sent to my new address in Arkadelphia, AR. I did not regularly check the status of my license due to the fact that I had a renewal for the next few years. If I had knowledge and had received the certified letter I would have responded.

I am currently working at the Arkansas Department of Education as a School Improvement Specialist. Due to my position an Arkansas teaching certificate is required. Due to the notification of Georgia revoking my certification it is putting my current certification at risk. Due to the circumstances I am requesting that this rule is waived and I am given the opportunity to defend my teaching license.

I appreciate your time in considering this request.

Sincerely

Kerri Hendrix (Williams)



**EDUCATOR
EXHIBIT 11**

Subject: RE: Question
From: Jennifer Cobb (jennifer.cobb@GAPSC.com)
To: kerrihj@yahoo.com;
Date: Thursday, March 19, 2015 9:41 AM

The certification department will receive an email to continue the processing of your application. I think that Investigator Jackson sends that information to them once a month. So give it until next week and then contact the certification department regarding the status of your application. Thank you.

Regards,

Jennifer Cobb, Legal Secretary
Georgia Professional Standards Commission
Ethics Division
jennifer.cobb@gapsc.com

From: Kerri Hendrix-Jackson [mailto:kerrihj@yahoo.com]
Sent: Thursday, March 19, 2015 9:52 AM
To: Jennifer Cobb
Subject: Question

Ms. Cobb,

I wanted to know about the time it takes to process the packet to request application for certification. I sent my packet in February 20 and was wondering when I should hear something.

Thank you

Kerri Williams

**EDUCATOR
EXHIBIT 12**

Subject: RE: Question
From: Jennifer Cobb (jennifer.cobb@GAPSC.com)
To: kerrihj@yahoo.com;
Date: Thursday, March 19, 2015 10:34 AM

Ms. Hendrix,

Please disregard the information I previously sent to you. Also, please just be patient with our department we are working on various cases and it does take time. If our office needs anything additional from you, someone will reach out to you. Otherwise, rest assure your request is being processed. Thank you.

Regards,

Jennifer Cobb, Legal Secretary
Georgia Professional Standards Commission
Ethics Division
jennifer.cobb@gapsc.com

From: Kerri Hendrix-Jackson [mailto:kerrihj@yahoo.com]
Sent: Thursday, March 19, 2015 11:09 AM
To: Jennifer Cobb
Subject: Re: Question

I believe it was to see if I could apply. I have attached the letter so we are on the same page. Let me know if your previous email is still in effect.

Thanks!

From: Jennifer Cobb <jennifer.cobb@GAPSC.com>
To: Kerri Hendrix-Jackson <kerrihj@yahoo.com>
Sent: Thursday, March 19, 2015 9:41 AM
Subject: RE: Question

**EDUCATOR
EXHIBIT 13**

**Georgia Professional
Standards Commission**



October 8, 2015

Ms. Kerri Eugenia Hendrix
101 Raywood Dr
sherwood, AR 72120

RE: Disciplinary Action before the Professional Standards Commission
Case #15-3-740; Certificate #648260

Dear Kerri Hendrix:

The Professional Standards Commission (PSC) is charged with the investigation of matters involving violations of any law or the Code of Ethics by Georgia educators and the discipline of educators who violate the law or the code. On October 8, 2015, the Commission considered your case and ordered and adjudged to deny you the right to reapply for a Georgia Educator Certificate. The Commission voted to deny your petition because the information provided did not warrant a waiver of the three year waiting period as required by PSC rules.

Should you have any questions regarding this matter, please contact our office at the number shown below.

Sincerely,

Kelly C. Henson

KCH: nt



**ARKANSAS
DEPARTMENT
OF EDUCATION**

**Arkansas Professional
Licensure Standards Board**

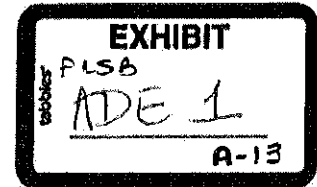
Integrity ■ Knowledge ■ Professionalism

ADE Case ID: 6690919

August 26, 2015

Via Certified and Regular Mail: 91 7199 9991 7035 6965 3280

Mr. Bruce A. Maddox



PERSONAL AND CONFIDENTIAL

Re: Background Check

Dear Mr. Maddox:

In accordance with Ark. Code Ann. § 6-17-410 et seq., this office is required to conduct background checks as a condition of licensure and employment by local school districts. As your background check revealed a disqualifying offense, we will recommend that the State Board of Education **deny** your eligibility for licensure and employment in an Arkansas public school.

Specifically, your background check revealed that you were found guilty of the following disqualifying offense:

Nature of offense:	Possession of Controlled Substance (Felony)
Date of arrest or conviction:	2001/09/14
Arresting Agency:	El Paso County Sheriff's Office (CO)

Arkansas law provides that the State Board of Education shall not issue or renew the license of any person who pleads guilty to certain enumerated offenses. Ark. Code Ann. § 6-17-410(c). In addition, you are ineligible for employment in any public school under Ark. Code Ann. § 6-17-411.

You are entitled to a hearing in front of the State Board of Education regarding the denial of your license based on the disqualifying offense. Ark. Code Ann. § 6-17-410(f) authorizes the State Board to grant waivers of the licensure eligibility provisions upon the request of an affected applicant.

**Arkansas Department of Education, Professional Licensure Standards Board
Four Capitol Mall Box 30, Little Rock, AR 72201
(501) 371-8014 main office; (501) 682-3781 fax**

The contents of this message may be protected by attorney client privilege, state, or federal law from public disclosure. If you are not the intended recipient you are notified that disclosing, copying, and distributing may be strictly prohibited.

To request a waiver hearing concerning the disqualifying offense, you must submit your written request to this office, by mail or by e-mail, within thirty (30) days of the date of this letter.

Further, because the Federal Bureau of Information criminal records check revealed one (1) or more records, we are required to advise you of your right to challenge or complete the accuracy of the information in the record. We have enclosed information outlining your rights. To challenge a record with the Federal Bureau of Investigation contact:

FBI CJIS Division
Attention: Criminal History Analysis Team I
1000 Custer Hollow Road
Clarksburg, WV 26306

(or go to www.fbi.gov, and enter in the search box Challenge of a Criminal History Summary)

You may also consult the FBI website at the following address to obtain further information: <http://www.fbi.gov/about-us/cjis/criminal-history-summary-checks/challenge-of-a-criminal-history-summary>.

You must contact this office within fourteen (14) days of the date of this letter if you intend to challenge or complete the FBI criminal history record or wish to provide this office with additional information about the disposition of the disqualifying offense(s).

If you have any questions, please feel free to contact me by phone at (501) 682-0166 or by e-mail at Jennifer.Liwo@arkansas.gov.

Sincerely,

Jennifer N. Liwo

Jennifer N. Liwo

Staff Attorney, PLSB/Educator Licensure

Enclosures (*Noncriminal Justice Applicant's Privacy Rights, Requesting a Waiver of a Disqualifying Offense*)

cc: Ivy Pfeffer, Assistant Commissioner, HR/Educator Licensure
Darrick Williams, Director of Educator Licensure

Arkansas Department of Education, Professional Licensure Standards Board
Four Capitol Mall Box 30, Little Rock, AR 72201
(501) 371-8014 main office; (501) 682-3781 fax

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Jennifer Liwo (ADE)

From: Clayton Blackstock <cblackstock@mitchellblackstock.com>
Sent: Monday, August 31, 2015 2:45 PM
To: Jennifer Liwo (ADE)
Subject: Bruce Maddox - Request for Waiver Hearing

Jennifer --

We will be representing Bruce Maddox. He is in receipt of your letter of August 26, 2015. We are requesting a waiver hearing on his behalf. He will be submitting a written statement and reference letters shortly. If you want to e-mail us the form to authorize the release of criminal records, we will get it signed and notarized and back to you right away.

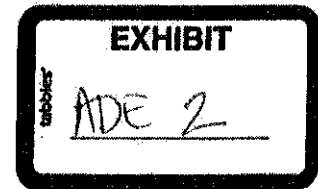
Thanks.

Clayton



Clayton Blackstock • Attorney

1010 West Third Street
P.O. Box 1510
Little Rock, AR 72203-1510
Phone: 501-378-7870
Fax: 501-375-1940
E-mail: cblackstock@mitchellblackstock.com
www.mitchellblackstock.com



Ranked one of the Best Law Firms for Health Care Law in Arkansas
One of few Health Law Firms in Arkansas to be Ranked in the top tier
U.S. News - Best Law Firms

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ATTORNEYS

EUGENE R. WARREN (1909-1980)
MICHAEL W. MITCHELL*
CLAYTON R. BLACKSTOCK**
DAVID IVERS**
EMILY SNEDDON
WILLIAM T. MARSHALL
GREG ALAGOOD
ROBERT W. WRIGHT
JANET PULLIAM
TAMERA DEEVER

P.O. BOX 1510
LITTLE ROCK | ARKANSAS | 72203
FACSIMILE | 501.375.1840

*ALSO LICENSED IN COLORADO
**ALSO LICENSED IN TEXAS

WRITER'S E-MAIL
gblackstock@mitchellblackstock.com

September 24, 2015

VIA FAX NO. 682-3781
HARD COPY TO FOLLOW

Jennifer Liwo, Staff Attorney
Ark. Prof. Licensure Standards Board
Arkansas Department of Education
4 Capitol Mall, Box 30
Little Rock, AR 72201

RE: Bruce A. Maddox

Dear Jennifer:

As I believe you are aware, our law firm represents Bruce A. Maddox. This is notice that Mr. Maddox requests a hearing in front of the State Board of Education regarding your notice of denial of licensure to him dated August 26, 2015.

I understand that you will confirm in writing this request for a hearing. I will be furnishing you with a packet of documentation regarding the factors for the Board to consider as set out in Ark. Code Ann. § 6-17-410.

Please let me know if you have any questions or need additional information from me at this time. As always, I look forward to working with you.

Sincerely,


Greg Alagood

GA/mw

Cc: Bruce Maddox



ARKANSAS
DEPARTMENT
OF EDUCATION

Arkansas Professional
Licensure Standards Board

Integrity ■ Knowledge ■ Professionalism

AELS CID: 6690919

September 30, 2015

PERSONAL AND CONFIDENTIAL

Via Regular Mail and Certified Mail: 91 7199 9991 7035 9920 9327

Mr. Greg Alagood/ Mr. Clayton Blackstock
Mitchell, Blackstock, Ivers, Sneddon & Marshall, PLLC
1010 West Third Street
Little Rock, AR 72201

EXHIBIT

ADE 3

Re: Bruce A. Maddox; Waiver Hearing Request

Dear Mr. Alagood and Mr. Blackstock:

I have received your letters requesting a waiver hearing before the Arkansas State Board of Education ("Board"). The waiver hearing will concern your client's conviction on the following offense:

Possession of Controlled Substance (Felony)

The hearing is scheduled **for November 12, 2015**. The Board meets **at 10:00 a.m.** in the Auditorium of the Arkansas Department of Education – Arch Ford Education Building, Four Capitol Mall, Little Rock, 72201. The hearings are typically held at the end of the agenda. As the time at which any agenda item is heard is within the Board's discretion, I am unable to tell you exactly when your client's matter will be heard.

The information considered by the Board at the hearing includes, but is not limited to:

- Age of the educator at the time of the offense
- The circumstances surrounding the offense
- The length of time since the offense
- Subsequent work history
- Employment references
- Character references
- Other evidence demonstrating that the applicant does not pose a threat to the health or safety of school children or school personnel.

***Arkansas Department of Education, Professional Licensure Standards Board
Four Capitol Mall Box 30, Little Rock, AR 72201
(501) 371-8014 main office; (501) 682-3781 fax***

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Please provide me with a written statement and any supporting documents that at a minimum address those considerations, including the names and phone numbers of persons who may verify information contained in your statement or documentation. **The aforementioned written statement and document(s) must be provided no later than Wednesday, October 21, 2015.**

I have enclosed an excerpt from the Rules Governing Background Checks. Please read the Section 8 excerpt as they apply to the hearing process. The full content of the rules may also be viewed online at <http://www.arkansased.org/> under Rules – Current.

Finally, I have enclosed a form authorizing the release of your client's records. Please have your client complete, sign, and notarize the form. The form should be returned to me. If you have any questions, feel free to contact me by phone at (501) 682-0166 or by e-mail at Jennifer.Liwo@arkansas.gov.

Sincerely,

Jennifer N. Liwo

Jennifer N. Liwo
Staff Attorney, Ethics & Licensure

Enclosures (*Section 8 Excerpt, Request for Release of Records Form*)

cc: Ivy Pfeffer, Assistant Commissioner, HR/Educator Licensure
Darrick Williams, Director of Educator Licensure
Bruce A. Maddox [REDACTED]

Arkansas Department of Education, Professional Licensure Standards Board
Four Capitol Mall Box 30, Little Rock, AR 72201
(501) 371-8014 main office; (501) 682-3781 fax

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El Paso County Sheriff's Office

BOOKING REPORT 0100014730

Location: RELEASED

Booking Number: 0100014730 Inmate PIN: A00201607 Booking Date/Time: 09/05/2001 12:12 Scheduled Release: 09/06/2001 11:48 Release Date/Time: 09/06/2001 11:48 Booking Officer: RUSH, DOROTHEA Entry Officer:
Last Name: MADDOX First Name: BRUCE Middle Name: ALLEN Name Suffix: Juvenile Dispo: Language Spoken: ☒ Booking Complete

Caution:

PERSONAL INFORMATION

Current Address: Home Address:
Phone: Phone:
Residence: S.S.N.: Drivers License: DL: CO:
State ID No.: FBI: Other ID:
Date of Birth: Age 52 Sex M Race W Ethnicity N Height 602 Weight 200 Build
Eyes BLU ☐ Glasses Hair RED Style Length Skin
Facial Teeth Marital Status D Religion CHRISTIAN Yrs Ed. 18
Place of Birth JACKSONVILLE, FL Citizenship US Gang

CHARGES

Statute 18-4-501 CRIMINAL MISCHIEF FTA Level M2 Degree M2 Type
OBTS Booking Case Arrest Date/Time 09/05/2001 09:45
Arrest Location 3842 N. NEVADA COLO SPRINGS CO Arresting Agency ORI EPSF ☐ Domestic
Arresting Officer GRIFFIN Arresting Agency Case No. 01-11097
Warrant Type Warrant Citation C0212001M 004392
Other Chargeable Offense
End Of Sentence Date: Bond Amount 600 Cash Bond Type
Court Case C0212001M 004392 Court Date 09/06/2001 Judge Court Venue CG

Disposition

Comments BOND RTN: 18 SEPT 2001 @ 09:00 IN RM 103
Cleared Bond Cleared Comments

Statute 18-18-405 UNLAWFUL POSS SCH II CONT SUBS Level F4 Degree F4 Type
OBTS Booking Case Arrest Date/Time 09/05/2001 09:45
Arrest Location 3842 N. NEVADA COLO SPRINGS CO Arresting Agency ORI EPSF ☐ Domestic
Arresting Officer GRIFFIN Arresting Agency Case No. 01-11097
Warrant Type Warrant Citation PRELIM1
Other Chargeable Offense
End Of Sentence Date: Bond Amount 1000 - Total Bond Cash - Total Bond Bond Type
Court Case PRELIM1 Court Date 09/06/2001 Judge Court Venue CG

Disposition

Comments BOND INFO: 12 SEPT 2001 @ 15:15 IN RM 102
Cleared Bond Cleared Comments

Statute 42-3-133 USE OF VEHICLE WITHOUT REGISTRATION Level TA Degree TA Type
OBTS Booking Case Arrest Date/Time 09/05/2001 09:45
Arrest Location 3842 N. NEVADA COLO SPRINGS CO Arresting Agency ORI EPSF ☐ Domestic
Arresting Officer GRIFFIN Arresting Agency Case No. 01-11097
Warrant Type Warrant Citation PRELIM1
Other Chargeable Offense
End Of Sentence Date: Bond Amount 1000 - Total Bond Cash - Total Bond Bond Type
Court Case PRELIM1 Court Date 09/06/2001 Judge Court Venue CG

Disposition

Comments BOND INFO: 12 SEPT 2001 @ 15:15 IN RM 102
Cleared Bond Cleared Comments

EXHIBIT

ADE 4

EPC SHERIFF'S OFFICE
Report Released To: AR Dept. by Educ
Date: 10-20-15
Report Released By: AS
Date:

El Paso County Sheriff's Office

BOOKING REPORT 0100014730

Location: RELEASED

Statute 42-4-1409

COMPULSORY INSURANCE

Level T1

Degree T1

Type

OBTS

Booking Case

Arrest Date/Time 09/05/2001 09:45

Arrest Location

Arresting Agency ORI EPSF

☐ Domestic

Arresting Officer GRIFFIN

Arresting Agency Case No. 01-11097

Warrant

Type

Warrant

Citation PRELIM1

Other Chargeable Offense

End Of Sentence Date:

Bond Amount 1000 - Total Bond

Cash - Total Bond

Bond Type

Court Case PRELIM1

Court Date 09/06/2001

Judge

Court Venue CG

Disposition

Comments BOND INFO: 12 SEPT 2001 @ 15:15 IN RM 102

Cleared Bond

Cleared Comments

HOLDS INFORMATION

SCARS/MARKS/TATTOOS

Code	Description	Comment
------	-------------	---------

ALIAS INFORMATION

Name	DOB	SSN
------	-----	-----

EMPLOYMENT

Employer	Address
Phone	
Occupation	How Long <input type="checkbox"/> Part Time <input type="checkbox"/> Student

VEHICLE

License	State	Veh. Year	Make	Model	Style	Color
Impound			Phone			
Address			<input type="checkbox"/> Hold on Vehicle	Hold Agency		
Comments						

BOOKING COMMENTS

LEGAL REPRESENTATION

Attorney Name	Phone	<input checked="" type="checkbox"/> Phone Call Made
---------------	-------	-----------------------------------------------------

NEXT OF KIN

EX-SPOUSE

Name JOY MADDOX
Home Phone
Work Phone

Address

NOTIFICATION

Officer Signature

Inmate Signature

EPC SHERIFF'S OFFICE
Report Released To: AR Dept of Educ
Date:
Report Released By: AS
Date:



EL PASO COUNTY SHERIFF'S OFFICE

27 EAST VERMIJO AVENUE
COLORADO SPRINGS, CO 80903
719.520.7100

INCIDENT REPORT

CASE NUMBER 01011097	SUPPLEMENT NUMBER
CASE TYPE 180101	CAD EVENT NUMBER 1
REPORTING OFFICER 078003 -	REPORT DATE 09/05/2001

INCIDENT

LOCATION [REDACTED]			OCCURRED		DATE	TIME	DAY
PREMISE NAME			ON OR FROM		09/05/2001	09:40	4
JURISDICTION EPSO			TO		09/05/2001	09:40	4
DISTRICT	GRID 9000	SHIFT	REPORTED		09/05/2001	09:45	

RELATED CASE NUMBERS

SYNOPSIS

EPC SHERIFF'S OFFICE
Report Released To: AR Dept of Educ.
Date:
Report Released By: AS
Date: 10-20-15

ADDITIONAL INFORMATION

<input type="checkbox"/> COMPUTER USED	<input type="checkbox"/> BURGLARY	<input type="checkbox"/> MOTOR VEHICLE THEFT
<input type="checkbox"/> FELONY	<input type="checkbox"/> MISDEMEANOR	<input type="checkbox"/> USE OF FORCE
<input type="checkbox"/> SCHOOL RELATED	<input type="checkbox"/> CRIM TRES AUTO	<input type="checkbox"/> ROBBERY
Marijuana	IBR Clear Code	At Risk

STATUS

CASE STATUS CBA	CASE STATUS DATE	DISPOSITION	DISPOSITION DATE	APPROVAL 90025 - Stone, Rosalyn	APPROVAL DATE 03/28/2003
---------------------------	------------------	-------------	------------------	-------------------------------------------	------------------------------------

INCIDENT REPORT	EL PASO COUNTY SHERIFF'S OFFICE	CASE NUMBER 01011097
------------------------	----------------------------------------	--------------------------------

OFFENSES

ENTRY NO 1	VIOLATION/STATUTE 18-18-405		OFFENSE DESCRIPTION					
ATTEMPTED	LEVEL F	DEGREE	COUNTS	NCIC CODE	BCS CODE	DISPOSITION 4	DISPOSITION DATE	
AGENCY CLASSIFICATION		LOCATION OF OFFENSE						
GOC		MODIFIER 1	MODIFIER 2		MODIFIER 3			
COURT		COURT DATE		JUDGE				
COMMENT								
ENTRY NO 2	VIOLATION/STATUTE 42-3-133		OFFENSE DESCRIPTION					
ATTEMPTED	LEVEL F	DEGREE	COUNTS	NCIC CODE	BCS CODE	DISPOSITION 4	DISPOSITION DATE	
AGENCY CLASSIFICATION		LOCATION OF OFFENSE						
GOC		MODIFIER 1	MODIFIER 2		MODIFIER 3			
COURT		COURT DATE		JUDGE				
COMMENT								
ENTRY NO 3	VIOLATION/STATUTE 42-4-1409		OFFENSE DESCRIPTION					
ATTEMPTED	LEVEL F	DEGREE	COUNTS	NCIC CODE	BCS CODE	DISPOSITION 4	DISPOSITION DATE	
AGENCY CLASSIFICATION		LOCATION OF OFFENSE						
GOC		MODIFIER 1	MODIFIER 2		MODIFIER 3			
COURT		COURT DATE		JUDGE				
COMMENT								
ENTRY NO 4	VIOLATION/STATUTE 16-2-110		OFFENSE DESCRIPTION					
ATTEMPTED	LEVEL F	DEGREE	COUNTS	NCIC CODE	BCS CODE	DISPOSITION 4	DISPOSITION DATE	
AGENCY CLASSIFICATION		LOCATION OF OFFENSE						
GOC		MODIFIER 1	MODIFIER 2		MODIFIER 3			
COURT		COURT DATE		JUDGE				
COMMENT								

PROPERTY

ENTRY NO 1	INVOLVEMENT	TYPE	MAKE COLORA	MODEL
SERIAL NUMBER	QUANTITY 2	COLOR	COLOR	OAN
DESCRIPTION L PLAT - KBK7853 (1G)	REF NO 1	EVIDENCE N		
VALUE STOLEN \$1.00	DATE STOLEN 09/05/2001	JURISDICTION STOLEN		
COMMENT 18-18-405 UNLA SALE/POS POSS COCAINE				
ENTRY NO 2	INVOLVEMENT	TYPE	MAKE COLORA	MODEL
SERIAL NUMBER	QUANTITY 1	COLOR	COLOR	OAN
DESCRIPTION D LICE - BRUCE MADDOX (2G)	REF NO 2	EVIDENCE N		
VALUE STOLEN \$1.00	DATE STOLEN 09/05/2001	JURISDICTION STOLEN		
COMMENT 18-18-405 UNLA SALE/POS POSS COCAINE				
ENTRY NO 3	INVOLVEMENT	TYPE	MAKE CAMBRI	MODEL
SERIAL NUMBER	QUANTITY 1	COLOR	COLOR	OAN
DESCRIPTION	REF NO	EVIDENCE		

EPC SHERIFF'S OFFICE
 Report Released To: AR Dept of Educ.
 Date:
 Report Released By: AS
 Date:

INCIDENT REPORT		EL PASO COUNTY SHERIFF'S OFFICE						CASE NUMBER 01011097	
ENTRY NO 4	DESCRIPTION TUBING - PLASTIC W/10 TEASPOONS (3C)								CUSTODY STATUS
	VALUE STOLEN	DATE STOLEN	JURISDICTION STOLEN						
	\$5.00	09/05/2001							
	COMMENT 18-18-405 UNLA SALE/POS POSS COCAINE								
	INVOLVEMENT	TYPE	MAKE				MODEL		
	SERIAL NUMBER	QUANTITY	COLOR	COLOR	OAN	REF NO	EVIDENCE		
		4				4	N		
ENTRY NO 5	DESCRIPTION PARAPH - BLADE/TSPS/TUBE/METAL PIN W/RESIDUE(4C)								CUSTODY STATUS
	VALUE STOLEN	DATE STOLEN	JURISDICTION STOLEN						
	\$1.00	09/05/2001							
	COMMENT 18-18-405 UNLA SALE/POS POSS COCAINE								
	INVOLVEMENT	TYPE	MAKE				MODEL		
	SERIAL NUMBER	QUANTITY	COLOR	COLOR	OAN	REF NO	EVIDENCE		
		1				5	N		
ENTRY NO 6	DESCRIPTION MIRROR - 4" X 6" OVAL W/RESIDUE (5C)								CUSTODY STATUS
	VALUE STOLEN	DATE STOLEN	JURISDICTION STOLEN						
	\$1.00	09/05/2001							
	COMMENT 18-18-405 UNLA SALE/POS POSS COCAINE								
	INVOLVEMENT	TYPE	MAKE				MODEL		
	SERIAL NUMBER	QUANTITY	COLOR	COLOR	OAN	REF NO	EVIDENCE		
		4				6	N		
ENTRY NO 7	DESCRIPTION BAG - PLASTIC W/RESIDUE (6C)								CUSTODY STATUS
	VALUE STOLEN	DATE STOLEN	JURISDICTION STOLEN						
	\$1.00	09/05/2001							
	COMMENT 18-18-405 UNLA SALE/POS POSS COCAINE								
	INVOLVEMENT	TYPE	MAKE				MODEL		
	SERIAL NUMBER	QUANTITY	COLOR	COLOR	OAN	REF NO	EVIDENCE		
		3				7	N		
ENTRY NO 8	DESCRIPTION SCRUBB - BRASS WOOL CHORE BOY W/RESIDUE (7C)								CUSTODY STATUS
	VALUE STOLEN	DATE STOLEN	JURISDICTION STOLEN						
	\$1.00	09/05/2001							
	COMMENT 18-18-405 UNLA SALE/POS POSS COCAINE								
	INVOLVEMENT	TYPE	MAKE				MODEL		
	SERIAL NUMBER	QUANTITY	COLOR	COLOR	OAN	REF NO	EVIDENCE		
		3				8	N		
ENTRY NO 9	DESCRIPTION PARAPH - SCISSORS/BOTTLE OPENER/KNIFE/PADS (8C)								CUSTODY STATUS
	VALUE STOLEN	DATE STOLEN	JURISDICTION STOLEN						
	\$1.00	09/05/2001							
	COMMENT 18-18-405 UNLA SALE/POS POSS COCAINE								
	INVOLVEMENT	TYPE	MAKE				MODEL		
	SERIAL NUMBER	QUANTITY	COLOR	COLOR	OAN	REF NO	EVIDENCE		
		1				9	N		
ENTRY NO 10	DESCRIPTION PARAPH - CLR GRN GLS PIPE W/SCREEN/W/RESIDUE (9G)								CUSTODY STATUS
	VALUE STOLEN	DATE STOLEN	JURISDICTION STOLEN						
	\$1.00	09/05/2001							
	COMMENT 18-18-405 UNLA SALE/POS POSS COCAINE								
	INVOLVEMENT	TYPE	MAKE				MODEL		
	SERIAL NUMBER	QUANTITY	COLOR	COLOR	OAN	REF NO	EVIDENCE		
		1				10	N		
ENTRY NO 11	DESCRIPTION AUTOMO - SIL 1991 4D								CUSTODY STATUS
	VALUE STOLEN	DATE STOLEN	JURISDICTION STOLEN						
	\$1.00	09/05/2001							
	COMMENT 18-18-405 UNLA SALE/POS POSS COCAINE								
	INVOLVEMENT	TYPE	MAKE				MODEL		
	SERIAL NUMBER	QUANTITY	COLOR	COLOR	OAN	REF NO	EVIDENCE		
		1				11	N		

EL PASO SHERIFF'S OFFICE
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 Date:

INCIDENT REPORT		EL PASO COUNTY SHERIFF'S OFFICE				CASE NUMBER 01011097	
SERIAL NUMBER	QUANTITY	COLOR	COLOR	QAN	REF NO	EVIDENCE	
	1				11	N	
DESCRIPTION						CUSTODY STATUS	
ID - BELONGING TO JENNIFER CONGELTON (1BG)							
VALUE STOLEN	DATE STOLEN	JURISDICTION STOLEN					
\$1.00	09/05/2001						
COMMENT							
18-18-405 UNLA SALE/POS POSS COCAINE							

NARRATIVE


2001011097000N01 20010905regrec On 09/05/01, I, Detective John Griffin along with Detective Harlan Calahan both of the El Paso County Sheriff's Office Fugitive Unit, was operating in the north end of Colorado Springs. We were attempting to locate persons wanted on warrants out of El Paso County. Detective Calahan and I arrived at 4700 North Nevada Avenue, which is the Bighorn Motor Lodge North, to attempt to contact a Bruce Maddox. Our records indicated that Maddox had been staying in unit #5 at this location and that he should have a silver colored 1991 Mercury Sable with Colorado temporary 23585P affixed to it. We went into the manager's office area and asked if Maddox was still staying in #5 and at this time showed them a photograph of Maddox. They advised that they recognized Maddox and knew his name, however, they stated that he had moved out the previous day at 11:00 a.m. They advised that he had displayed erratic behavior, where he would sleep all day and stay up and walk around the area all night and therefore they had asked him to leave. Management advised that the best bet would be to check up and down North Nevada Avenue at other area motels. We were also advised that Maddox had shaved his beard and mustache, which had been indicated on his booking photo from 08/16/01. Detective Calahan and I next responded to the B n B Motel, located at 4918 North Nevada Avenue, however, did not locate the subject's vehicle. We next responded to the Peak View Inn, located at 4950 North Nevada Avenue and checked the front and then went to the rear, which is the west, at which time we observed the suspect, Bruce Maddox, driving north through parking lot areas in the aforementioned silver Mercury Sable, however, it was bearing a rear plate only of KBK7853. We followed Maddox north from that location, approximately 400 or 500 yards and then the subject went out to Nevada Avenue and proceeded southbound. Maddox drove south on Nevada Avenue and pulled over at a liquor store at 3842 North Nevada Avenue. He was the only occupant of the vehicle. He exited and went to a pay phone located on the southeast corner of the building. Detective Calahan and I approached Maddox and advised him that he was under arrest for Failure to Appear on an El Paso County warrant case number CO212001M004392 original charge of Criminal Mischief with a \$600.00 bond. As Maddox was placed under arrest, he was handcuffed and then a pat search was conducted. I immediately felt a large bulge in the right front jean pocket of Maddox and I then withdrew the item which made the bulge, which was a clear glass and green glass crack pipe. The pipe had in it a screen which actually appeared to look like a copper scrub brush. I felt that the item could possibly have on it residue from a scheduled II controlled substance. Detective Calahan proceeded to check the subject and all items were to be taken out of his pockets, from this point on, as a precaution and due to the fact that the subject was under arrest and all items would be collected for his property and placed at the Criminal Justice Center (CJC). Detective Calahan retrieved a Colorado identification from the left front jean pocket. This was a Colorado identification card [REDACTED] for Jennifer Lynne Congleton of [REDACTED]. Maddox stated that he did not know Congleton, but that he had found the ID card next to his vehicle days before and was going to try and return it to the subject. Detective Calahan started a search of the vehicle for impound purposes. While he did this, I asked Maddox if there was a registration and proof of insurance in the vehicle and he stated that the plates on it belonged to another one of his vehicles and that he did not have insurance. A check with dispatch showed that the license plate, KBK7853 which was affixed to the rear of this 1991 Mercury Sable, came back to Bruce Maddox on a tan 1993 Jeep utility, expiring 12/01. The Mercury Sable was to be towed and an impound number of I-01-428 was assigned to this vehicle. While Detective Calahan was conducting the inventory search of the vehicle he located several other items which appeared to be related to schedule II controlled substance. He found four small plastic

EL PASO COUNTY SHERIFF'S OFFICE
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INCIDENT REPORT	EL PASO COUNTY SHERIFF'S OFFICE	CASE NUMBER 01011097
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baggies with residue in them, a clear plastic round tube with many spoons in it, one of which also had white residue on it. Calahan also found an oval mirror in a plastic bag in the vehicle with a white powder residue on it. A field test of the residue and baggie #1 showed positive for the presence of cocaine. This test was done in front of Detective Calahan and Detective Sergeant Steve Pease by myself. While processing paperwork, I found a pawn slip in the wallet of Maddox. Had pawn slip #453866 which was dated the 09/04/01, at 1843 hours. The pawn slip was done by employee #969 for a black Member's men's leather jacket and \$40.00 was loaned on this item. Follow-up on this will be done at a later time. Bruce Allen Maddox was transported to the Criminal Justice Center and booked under Booking #0114730 on the outstanding warrant and a Probable Cause Affidavit for: 1. Possession of a Schedule II Controlled Substance, CRS 18-18-405, felony 4 2. Compulsory Insurance Required, CRS 42-4-1409 3. Violation of Registration, CRS 42-3-133 The following is a list of items which were later entered into evidence at the Law Enforcement Bureau. Item 1G was the set of license plates KBK7853. Item 2G the driver's license for Bruce Maddox. Item 3C a plastic tube, brand Cambridge, with 10 teaspoons in it, which Detective Calahan had recovered from the front passenger floorboards of the vehicle. Item 4C was four items which had previously been in item 3C which was a razor blade, teaspoon, glass test tube and a metal push pin, all of which had on them a white residue suspected of being schedule II substance. This was also recovered by Detective Calahan. Item 5C was an oval glass mirror with white residue on it recovered from the passenger floorboard by Detective Calahan. Item 6C was four small Zip-Loc baggies, all containing a residue all recovered by Detective Calahan from the vehicle. Baggies 1, 2 and 3 were from the area of the front passenger floorboard and baggie #4 was from the driver's side rear inside a pair of pants in a pocket. Item 7C was three pieces of copper wool Chore Boy with residue on them, recovered by Detective Calahan. Item 8C was miscellaneous paraphernalia which was a pair of scissors, a bottle opener, knife combination item, and a pack of Chore Boy pads, also recovered by Detective Calahan. Item 9G was the clear and green glass crack pipe with screen which contained residue found in the right front pocket of Bruce Maddox by Detective Calahan. Items 4C, 5C, 6C and 9G were all slated for laboratory request for drug analysis through the Colorado Springs Police Metro Crime Laboratory. A request for same was submitted. The Colorado ID will also be entered as evidence at the El Paso County Sheriff's Office as Item 10G. Case Status: Cleared by Arrest

EPC SHERIFF'S OFFICE
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 Report Released By: 43
 Date:

INCIDENT REPORT	EL PASO COUNTY SHERIFF'S OFFICE	CASE NUMBER 01011097						
 EL PASO COUNTY SHERIFF'S OFFICE 27 EAST VERMIJO AVENUE COLORADO SPRINGS, CO 80903 719.520.7100		SUPPLEMENT INCIDENT REPORT <table border="1"> <tr> <td>CASE NUMBER 01011097</td> <td>SUPPLEMENT NUMBER 1</td> </tr> <tr> <td>CASE TYPE 180101 ()</td> <td>CAD EVENT NUMBER</td> </tr> <tr> <td>REPORTING OFFICER</td> <td>REPORT DATE 09/05/2001</td> </tr> </table>	CASE NUMBER 01011097	SUPPLEMENT NUMBER 1	CASE TYPE 180101 ()	CAD EVENT NUMBER	REPORTING OFFICER	REPORT DATE 09/05/2001
CASE NUMBER 01011097	SUPPLEMENT NUMBER 1							
CASE TYPE 180101 ()	CAD EVENT NUMBER							
REPORTING OFFICER	REPORT DATE 09/05/2001							

INCIDENT

LOCATION				DATE 09/05/2001	TIME 00:00
PREMISE NAME					
DISTRICT	GRID	SHIFT	JURISDICTION EPSO		

STATUS

WORK FLOW STATUS APPROVED	APPROVAL 90025 - Stone, Rosalyn	APPROVAL DATE 03/28/2003
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NARRATIVE


2001011097001N01 20010905regrec On 09/05/01 at approximately 9:30 a.m., I, Detective Harlan James Calahan, along with Detective John Griffin, responded to 4700 North Nevada Avenue, room #5 to look for a suspect by the name of Bruce Allen Maddox, a white male, DOB [REDACTED], for a misdemeanor warrant. Upon arrival to this location we were informed by managers at this hotel that the defendant Maddox had been told to leave the premises because of his strange behavior during the night time hours and that he had possibly moved to one of the other local hotels in the area. We checked a hotel located at 4918 North Nevada Avenue and, as we were approaching the rear of the hotel, we noticed a vehicle that belonged to the suspect, a 1991 grey Mercury Sable exiting that location. It was determined that the suspect, Bruce Allen Maddox, was driving the vehicle. We followed the suspect southbound on Nevada Avenue to 3842 North Nevada Avenue, which is a local liquor store, and observed the suspect making a telephone call. We approached the suspect as he was talking on the telephone. After completion of his call, we identified ourselves as detectives with the El Paso County Sheriff's Office and explained to him that he was under arrest because of a local warrant. After placing the individual in custody and in handcuffs, Detective Griffin patted the suspect down and determined that the suspect had a glass crack pipe in his right front pocket. I checked the left front pocket of the suspect and determined that he had numerous papers, along with an ID card for a female named Jennifer Congleton. After the initial search we placed the suspect in our vehicle, at which time I proceeded to search his vehicle prior to impound and for any other illegal substances. I searched the vehicle, a 1991 Mercury Sable four door, bearing Colorado license plate KBK7853. The license plate on the vehicle was confirmed to be registered to 1993 Jeep utility vehicle expiring 12/01. As I searched the vehicle, I found several plastic baggies with possible schedule II and a plastic container with a razor blade and multiple spoons with one of the spoons having a white residue substance. These items were located on the passenger side of the vehicle, front floor. Also found was a mirror in a plastic bag which was heavily coated with white residue. Also there were two baggies found in the pants pocket of a pair of blue jeans located in the backseat, driver's side, with a white powder residue. All items were suspect with schedule II controlled substance. The vehicle was impounded and towed by Bob's Towing company and we transported the suspect to the Criminal Justice Center (CJC) and booked him on a local bench warrant for Failure to Appear, Criminal Mischief, Unlawful Possession of Schedule II Controlled Substance, Compulsory Insurance and Violation of Registration. At approximately 1:30 p.m., I, Detective Calahan along with Detective Griffin, met with Detective Sergeant Steve Pease at the south sub-station and tested one of the baggies which is labeled #1 for possible cocaine. Upon testing the baggie, it tested positive with an

EL PASO COUNTY SHERIFF'S OFFICE
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INCIDENT REPORT	EL PASO COUNTY SHERIFF'S OFFICE	CASE NUMBER 01011097
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approximate weight of .7 grams. All items were taken to the Law Enforcement Bureau and placed into the evidence facility, locker #3. I have no additional information regarding this case. Case Status: Cleared by Arrest

EPC SHERIFF'S OFFICE
Report Released To: AR Dept of Educ
Date:
Report Released By: AS
Date:

INCIDENT REPORT	EL PASO COUNTY SHERIFF'S OFFICE	CASE NUMBER 01011097
 <p>EL PASO COUNTY SHERIFF'S OFFICE 27 EAST VERMIJO AVENUE COLORADO SPRINGS, CO 80903 719.520.7100</p>	SUPPLEMENT INCIDENT REPORT	
	CASE NUMBER 01011097	SUPPLEMENT NUMBER 2
	CASE TYPE 180101 ()	CAD EVENT NUMBER
	REPORTING OFFICER .	REPORT DATE 09/06/2001

INCIDENT

LOCATION		DATE 09/06/2001	TIME 00:00
PREMISE NAME			
DISTRICT	GRID	SHIFT	JURISDICTION EPSO


STATUS

WORK FLOW STATUS APPROVED	APPROVAL 90025 - Stone, Rosalyn	APPROVAL DATE 03/26/2003
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NARRATIVE

2001011097002N01 20010906regrec On 09/06/01 at 1010 hours, I, Detective Griffin, placed a Colorado ID belonging to a Jennifer Congelton into evidence under #10G. Case Status: Cleared by Arrest

EPC SHERIFF'S OFFICE
Report Released To: AR Dept of Educ
Date:
Report Released By: AS
Date:

INCIDENT REPORT	EL PASO COUNTY SHERIFF'S OFFICE	CASE NUMBER 01011097
 EL PASO COUNTY SHERIFF'S OFFICE 27 EAST VERMIJO AVENUE COLORADO SPRINGS, CO 80903 719.520.7100	SUPPLEMENT INCIDENT REPORT	
	CASE NUMBER 01011097	SUPPLEMENT NUMBER 3
	CASE TYPE 180101 (I)	CAD EVENT NUMBER
	REPORTING OFFICER -	REPORT DATE 09/14/2001

INCIDENT

LOCATION		DATE 09/14/2001	TIME 00:00
PREMISE NAME			
DISTRICT	GRID	SHIFT	JURISDICTION EPSO


STATUS

WORK FLOW STATUS APPROVED	APPROVAL 80025 - Stone, Rosalyn	APPROVAL DATE 03/28/2003
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NARRATIVE

2001011097003N01 20010914regrec On 09/14/01 at approximately 1250 hours, I, LEB Technician Pearson, was contacted at the Law Enforcement Bureau by Bruce Maddox in reference to the vehicle impounded in this case. Mr. Maddox presented valid picture identification and proof of ownership of the vehicle and the vehicle was released to his possession. Copies of all documents are attached to this report. The vehicle was then removed from the active NCIC/CCIC impound files. I-01-428. Case Status: Cleared by Arrest

EPC SHERIFF'S OFFICE
 Report Released To: AR Dept of Educ
 Date:
 Report Released By: AS
 Date:

INCIDENT REPORT	EL PASO COUNTY SHERIFF'S OFFICE	CASE NUMBER 01011097
 <p>EL PASO COUNTY SHERIFF'S OFFICE 27 EAST VERMIJO AVENUE COLORADO SPRINGS, CO 80903 719.520.7100</p>	SUPPLEMENT INCIDENT REPORT	
	CASE NUMBER 01011097	SUPPLEMENT NUMBER 4
	CASE TYPE 180101 (I)	CAD EVENT NUMBER
	REPORTING OFFICER 03007 - CASIAS, PAULA JEAN	REPORT DATE 12/16/2009

INCIDENT

LOCATION		DATE 12/16/2009	TIME 09:00
PREMISE NAME			
DISTRICT	GRID	SHIFT	JURISDICTION EP&O

STATUS

WORK FLOW STATUS UPDATED	APPROVAL 08060 - WILCOX, SHANNON	APPROVAL DATE 02/05/2009
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NARRATIVE

regrec

On 02/05/09, I, Records Technician S. Wilcox, received a supplement to this case report from Evidence Technician Paula Casias, advising the following property items in this case were destroyed on 12/16/08.

1. Item #1G - License plate (2), Colorado #KBK7853
2. Item #2G - Colorado license, Bruce Maddox
3. Item #3C - plastic tube containing 10 t-spoons
4. Item #4C - Narcotic items
5. Item #5C - Mirror
6. Item #6C - Plastic baggies w/residue
7. Item #7C - Brass wool
8. Item #8C - Paraphernalia
9. Item #9C - glass pipe
10. Item #10G - Colorado ID #920450885

Nothing further.

Case Status: Cleared by Arrest

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EP&O SHERIFF'S OFFICE
Report Released To: AR Deputy Eddie
Date:
Report Released By: AS
Date:

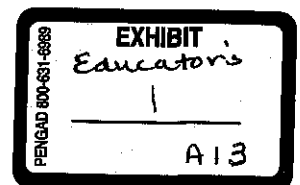
BEFORE THE ARKANSAS STATE BOARD OF EDUCATION

HEARING ON REQUESTED
WAIVER OF REVOCATION OF LICENSE

BRUCE A. MADDOX

NOVEMBER 12, 2015

- A. Statement of Bruce Maddox
- B. Statement of Kimberly Maddox
- C. Statement of Debbie Higgins (Math Dept. chair, NLR High School)
- D. Statement of Robert S. Tanner
- E. Statement of Beth Ann Wilstrop
- F. Statement of David N. Hipp, Col., Ret.
- G. Statement of Steve Evans
- H. Statement of Robert Appleby



Personal statement from Bruce Maddox

I was arrested in 2001 for possession of a controlled substance. There was an empty baggy with residue found in my car. I pleaded guilty, since it was mine and was given probation.

The previous year I had severe marital issues that were causing depression for both my first wife and myself. I lost my wife and I temporarily lost contact with my children.

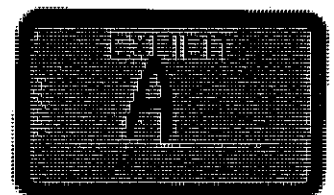
Very soon, I realized that I could not live my life this way. But it took me almost a year to successfully break away. I asked for help from my father, a retired minister, and my mother, a retired teacher. I moved in with them, went to church, and found myself again.

I was clean, sober, and working but knew what my true vocation needed to be. In my previous career in the United States Air Force, I was an instructor pilot, and then went on to teach second semester calculus at the United States Air Force Academy.

In 2004, I entered the ADE Non-Traditional Licensure program, and began what I feel like is my true calling.

I rediscovered a passion for teaching mathematics. Partly because of my prior experience, I have been fortunate enough to be teaching AP Calculus for over 8 years. I truly believe, because I have been told this, that I have made a positive impact in many student's life during this time.

My wife, who has known my story from almost the beginning, has told me that "it matters who you are now and who you are going forward". I hope you can look at my story and know that I have done nothing but try to be a positive influence since I before I became a teacher. Teaching is my passion and my life.



To Whom It May Concern:

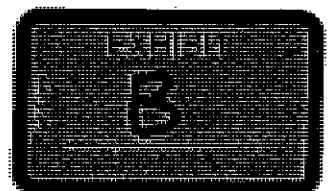
My name is Kimberly Maddox, the wife of Bruce Maddox. I realize that a statement from me may not seem to mean as much on the surface; but I'd like to tell you something about him.

I met Bruce in June of 2008. I started dating him because we both had common interests in music, education, and family. Bruce told me of his possession conviction a few weeks after we started dating. I had already witnessed his passion for teaching, music, and family. Honestly his openness and the regret he expressed helped me to fall even more in love with this man. I told him what I felt in my heart: "It does not matter to me who you were then. It only matters who you are now and going forward, and that you have learned from your mistake."

I am grateful every day to be married to Bruce. He absolutely keeps his promises. His dedication to teaching is unsurpassed. I can't tell you how many nights he is up until midnight, or later, checking homework and creating lesson plans. I have met many current and former students of his, and read emails from them. They all say what a difference he has made in their lives.

In closing, I will tell you that this man has a positive influence on those around him, and he is an excellent teacher. To take that away from him would be a tragedy. He has the unquestioned support of his family. He has been nowhere near any illegal substances for almost 15 years. He has made a difference to his students. You would be losing an asset to the public school system if you let him go. I have faith that you will make the right decision and allow Bruce to continue his passion of educating students and making a positive difference.

Sincerely,
Kimberly H. Maddox




September 17, 2015

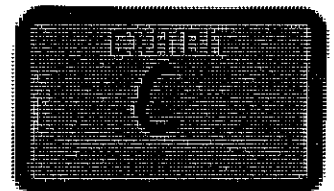
To Whom it May Concern,

I have had the pleasure of working with Bruce Maddox for the last 10 years in the math department at North Little Rock High School. As department chair for the math department, it has been very reassuring to know that Bruce is always willing to go above and beyond the expected to help students experience success in mathematics. He has taught Calculus AB/BC for 9 years at NLRHS and has excelled at the demands of teaching an upper level course, not only an understanding of an advanced subject but also the ability to reach students at all levels. Through collaboration and focus on common assessments, Bruce is always willing to do his part in a team effort to reach students. Because of his professional attitude and dedication to education, Bruce has been a pleasure to work with over the years.

Sincerely,


Debbie Higgins

Math Department Chair, North Little Rock High School
higginsd@nlrsd.org



From: Robert Tanner <n2hmndorgn@sbcglobal.net>

Date: October 12, 2015 at 9:48:09 PM CDT

To: Bruce Maddox <math_maddox@yahoo.com>

Subject: Letter

Reply-To: Robert Tanner <n2hmndorgn@sbcglobal.net>

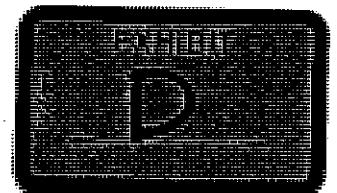
To whom it may
concern:

10-12-15

I have worked with Bruce Maddox professionally for approximately ten years and I have always found him to be hard working and conscientious.

I believe he has high integrity and is an all around excellent co-worker. Please feel free to contact me for further discussion.

Sincerely
Robert S. Tanner
501-515-7505



9478 Lands Point
San Antonio, TX 78250
Phone: (210) 912-7021
October 9, 2015

To whom it may concern,

I am writing to attest to the character of Bruce Maddox. I take character references very seriously: it is serious for the outcome of my friend needing the reference, and it is serious for the employer or agency governing my friend as they fairly attend to the needs of those serviced by my friend. Furthermore, it is serious for me because my reputation as a judge of human nature and a retired public school teacher is at stake. Bruce is my nephew-in-law, but he entered our family as a matured, seasoned man; so I see him as a close friend. I am overjoyed that he found my niece and her teen-aged children. He is a strong supporter of his wife and a valued role model for the children, now grown.

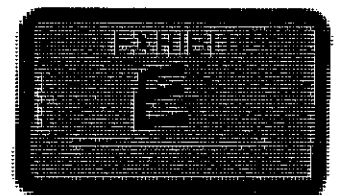
I have never seen Bruce at work in the classroom—he lives in Arkansas; I live in Texas—so we visit during school holidays. However, typical of teachers (in our cases: public high school teachers), our holiday visits involve teacher talk. We first “solve” all the states’ education agencies’ woes and then move on to kid tales. He is passionate about his career. He values math, he values the concept of Advanced Placement programs and their significance for his students toward their academic futures, and he values each child in his classes. When students could not fit his AP Calculus course (AB or BC) into their schedules, he arranged to video his class so they could continue their graduation plans. I have not spoken with his students, but after 36 years in education, I can tell when teachers are respected by those he serves. It is difficult to have the gleam in the eyes and the enthusiasm for doing what is right for kids if the seasoned teacher is not receiving a return from the students.

Bruce brought stability and calm into my Arkansas family, for which I am eternally grateful. We are an excitable bunch, but Bruce keeps a calm in the air and provides a positive environment for all of us. He is objective and helps others clear their minds and hearts to solve family drama.

I hope in this time of math teacher shortages that you can recognize a good teacher who contributes so much to the lives of his students.

Sincerely,


Beth Ann Willstrop



From: david hipp <dnhipp@gmail.com>
Date: October 8, 2015 at 9:00:34 PM CDT
To: math_maddox@yahoo.com
Subject: Letter of Reference

To the Arkansas Department of Education, this is a character reference for Bruce Maddox.

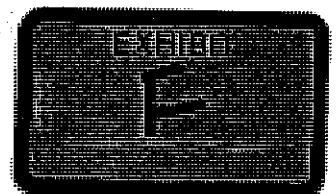
I first met Bruce in 2002 when he applied for a maintenance position with the apartments that I was managing. After reading through his application, I had some questions concerning why he was applying for the position. His education level, previous job as an instructor at the Air Force Academy placed him well over qualified for the job at hand. He was very upfront with me and told of his felony conviction and release from the academy. He also explained that he was back at home trying to start over knowing that he had done wrong and how hard it was to get started with jobs.

I convinced my supervisor to hire him after talking with friends of mine that knew his parents and Bruce and finding out that he was going straight and really trying. He did an excellent job for me and lived in an apartment next to the office that was subject to inspections at all times. He maintained a neat apartment, and kept his life straight. I could not ask for him to do more.

Toward the middle of 2004, he expressed an interest in getting back to teaching Math and since he knew that I was on the Cabot School Board, asked for pointers on how to go about it. Based on my knowledge of his teaching background and the excellent job he was doing for me at the apartments, I told him to apply at Cabot and other schools. I wrote him a letter of reference at that time and he was hired at Des Arc and left the apartments in late 2004.

I believe he was later offered an interview in Cabot and North Little Rock and subsequently went to work for the North Little Rock School District. Our paths have only crossed occasionally since then so I can tell you little about his work and professionalism at this time, but I sincerely believe Bruce recognized the error of his ways a long time ago. He definitely loved Math and teaching and I think is a stronger person and educator because of his experiences.

David N. Hipp, Col, Ret.



From: JVILGUITAR@aol.com
Date: September 14, 2015 at 2:39:46 PM CDT
To: math_maddox@yahoo.com
Subject: Character Reference for Bruce Maddox

To whom it may concern,

Bruce Maddox told me how it's time for teaching licenses to be renewed and his license has not been renewed. He explained how the problem is because he was convicted of drug possession in 2001.

I was surprised that Bruce has ever been in any trouble in his life. I really think of him as an All-American boy (man). Heck, he was a jet pilot in the Air Force.

I have known Bruce for 37 years. He has worked part time at my music store for more than 10 years, and before that he had been a customer of my shop going back to 1978.

I think Bruce is exactly who you want teaching. He is intelligent, honest, level-headed, and a good role model for kids. I think he has all the qualities you are looking for in a teacher. I wholeheartedly believe he has no interest in drugs and would never do anything to embarrass your school.

Sincerely,

Steve Evans, owner

Jacksonville Guitar Center

1105 Burman Drive

Jacksonville, AR 72076

(501) 982-4933



From: Robert Appleby <rappleby84@gmail.com>

Date: October 23, 2015 at 12:03:47 AM CDT

To: math_maddox@yahoo.com

Subject: Mr. Bruce Maddox

Having worked with Mr. Maddox since 2005, I can honestly say he is a professional and an excellent co-worker. He helps the customers, young and old, with what they need and offers good advice regarding equipment, whether it be an amp or a particular guitar, helping the customers achieve their goals musically. A lot of times, past and present students come by the shop to say hello to him, have questions regarding gear, and he always takes time to chit chat how they are doing, whether it be about school, family, life in general. We all have dealt with people who are in the education field who are not genuine, don't care about the students beyond the classroom. Mr. Maddox is the exact opposite. He is a wonderful person, a total pro on guitar, and an excellent teacher who cares about his students' well-being and their future.

-Robert Appleby

