UNIVERSITY OF THE STATE OF NEW YORK THE STATE EDUCATION DEPARTMENT	
NICOLE WILLIAMS, Petitioner, -against-	Appeal No. 20750
BOARD OF EDUCATION OF THE POUGHKEEPSIE CITY SCHOOL DISTRICT, SHEREEN CADER, JOHN SAMMON,	<u>AFFIDAVIT</u>
Respondents.	
From actions of the Board of Education restricting teacher transfers and rescinding a directive of the Superintendent regarding transfer of a teacher.	
STATE OF NEW YORK)) ss.: COUNTY OF DUTCHESS)	

SEAN DANESHVAR, being duly sworn, says:

- 1. I am the Director of Technology for the Poughkeepsie City School District (District).
- 2. Annexed hereto as Exhibit "A" is a true and accurate copy of the email and attachment that was sent by Dr. Nicole Williams to the Board of Education on August 30, 2017 regarding teacher transfers. I personally checked the District's computer server to confirm that this was in fact the actual document that was emailed by Dr. Williams to the Board.
- 3. I have been informed that the document annexed hereto as Exhibit "B" was submitted to the Commissioner of Education as Exhibit "B" to Dr. Williams' Reply Affidavit. I

have personally checked the District's computer server and attest that the document annexed to Dr. Williams' Reply Affidavit as Exhibit "B" was never sent to the Board of Education.

SEAN DÂNESHVAR

Sworn to before me this 20 th day of November, 2017

Notary Public

Maxine A Patrick Notary Public, State of New York No. 01PA6317897

Qualified in Dutchess County Commission Expires: 1 /2 /20

Exhibit "A"

From:

Dr. Nicole Williams <nwilliam@poughkeepsieschools.org>

Sent:

Wednesday, August 30, 2017 4:58 PM

To:

Felicia Watson; dcliffor@poughkeepsieschools.org; Raymond Duncan; Randy Johnson;

Debra Long; boe@poughkeepsieschools.org

Cc:

Miller, Howard; Miller, John; Dr. Nicole Williams

Subject:

Response to Directive

Attachments:

ATT00001.htm; Teacher Transfers 2017-18.pdf

Good afternoon, Honorable Board Members.

Pursuant to the directive, please see the attached document and the "Responses" outlined in the correspondence below.

Thank you.

Dr. Nicole Williams
Superintendent of Schools
Poughkeepsie City School District
(845) 451-4950 (W)
(845) 391-6221 (C)

Email: nwilliam@poughkeepsieschools.org

Sent from my iPhone

From: "[BOE] Dr. Felicia Watson" < fwatson@poughkeepsieschools.org>

Date: August 30, 2017 at 10:28:10 AM EDT

To: "Dr. Nicole Williams" < nwilliam@poughkeepsieschools.org>

Cc: Board Members < boe@poughkeepsieschools.org>, imiller@bsk.com, hmiller@bsk.com.

Stephanie Green president@ppsta.org>, ": Phee Simpson"

<psimpson@poughkeepsieschools.org>, Andrea Moriarty

<amoriart@poughkeepsieschools.org>, Jason Gerard <jgerard@poughkeepsieschools.org>,

"Da'Ron Wilson" < dwilson@poughkeepsieschools.org>, Mario Fernandez

<mfernand@poughkeepsieschools.org>, Linda Melton Mann

Imann@poughkeepsieschools.org>, Victoria Jackson < vjackson@poughkeepsieschools.org>

Subject: Board Approved Resolution #18-0013 & Policy 9420 Is In Complete Effect!

Dr. Williams:

[&]quot;Every scholar. Every day. Every classroom."

[&]quot;Teamwork makes the dream work."

[&]quot;Excellence is our goal."

This will acknowledge receipt of your letter dated August 28, 2017 regarding teacher transfers. As expressly stated in Section 1711 of the Education Law (which critical language you omitted from your letter) and our District policy, **transfers are subject to board approval.** In conjunction with Resolution # 18-0013 approved by the Board of Education on July 14, 2017, at this juncture, the Board has **not** approved any teacher or administrator transfers from one school building to another school building.

Furthermore, you have intentionally disregarded Resolution #18-0013 as it directed you to inform teachers and administrators, that you were transferring, to be informed in writing by **July 21, 2017** of the Board's moratorium on involuntary transfers for the optimal management of the district. Additionally, you have overidden objections of these involuntary teacher transfers from principals without explanation.

It is imperative that you provide the Board, by 5:00 pm today, August 30, 2017, with the following information for each individual proposed transfer:

1) Why the transfer is being made;

RESPONSE: To support the Receivership school/Struggling School. See the attached chart.

2) With whom you consulted about the transfer:

RESPONSE: Discussed with the president of the administrators' unit, the principals impacted and sent an email to this effect to the president of the teachers' unit. Discussed with the Board.

- 3) Where the wishes of the tenured teacher ascertained as per PPSTA contract; RESPONSE: Yes.
- 4) What, if any, support or objection was made by the principal; RESPONSE: Please see the attached chart.
 - 5) Why the transfer is being proposed so close to the beginning of the school year when this is clearly not in the best interest of students?

RESPONSE: Transfers were put into effect in accordance with the contract. Board issued a moratorium.

If there are legitimate factually supported reasons for the transfers, the Board will consider them in the best interests of our students. But those reasons **must** be clearly and thoroughly provided and substantiated in **complete facts**. Finally, I remind you that Board approved Resolution #18-0013 is **still** in complete effect as of today, August 30, 2017.

Dr. Watson C: 914.456.5085

On Mon, Aug 28, 2017 at 3:59 PM, Dr. Nicole Williams <<u>nwilliam@poughkeepsieschools.org</u>> wrote:

Good Afternoon, Honorable Board Members.

Please see the attached correspondence regarding the "Involuntary Transfer" directive, issued by the Board of Education.

Thank you.

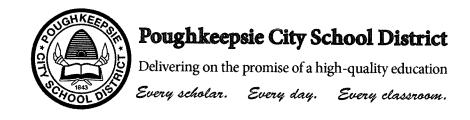
Sincerely,

Dr. Nicole Williams
Superintendent of Schools
Poughkeepsie City School District
(845) 451-4950 (W)
(845) 391-6221 (C)
Email: nwilliam@poughkeepsieschools.org

"Every scholar. Every day. Every classroom."

[&]quot;Teamwork makes the dream work."

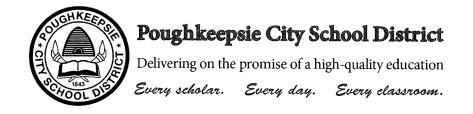
[&]quot;Excellence is our goal."



"Involuntary" Teacher Transfers 2017-2018

Teacher's Name	Placement	2017-18 Placement	Reason for Transfer	Discussion held with Principals/Any Objections?	Discussion held with the Board
Neil Grover	PMS	PHS	Medical Request— switching with Holly Dunn (same certification area).	Yes/No	Yes
Amber Grant	PMS	PHS	Teacher and principal—skill set mathematics expertise fit for the high school level.	Yes/No	Yes
John Sammon	Warring	Krieger	Receivership needs/skill set match for the sixth (6) grade. Certification is aligned with the instructional needs at PMS as a former instructional ELA coach.	Yes/Yes Principal stated that the teacher objected.	Yes
Holly Dunn	PHS	PMS	Medical Request from Mr. Grover—switching with Mr. Grover (same certification area).	Yes/No	Yes
Shereen Cader	Krieger	PMS	Receivership needs/skill set match for the sixth (6) grade. Certification is aligned with the instructional needs at PMS.	Yes/Yes Principal stated that the teacher objected.	Yes
Kenneth Conrad	PMS	Warring	Returning from medical leave—certification is aligned with the instructional needs at Warring.	Yes/No	Yes
Andrea Boccio	PMS	Krieger	Certification is aligned with the instructional needs at Krieger.	Yes/No	Yes

Exhibit "B"



"Involuntary" Teacher Transfers 2017-2018

Teacher's Name	2016-17 Placement	2017-18 Placement	Reason for Transfer	Discussion held with Principals/Any Objections?	Discussion held with the Board
Neil Grover	PMS	PHS	Medical Request— switching with Holly Dunn (same certification area).	Yes/No	Yes
Amber Grant	PMS	PHS	Teacher and principal—skill set mathematics expertise fit for the high school level.	Yes/No	Yes
John Sammon	Warring	Krieger- did not transfer in June PMS- did not transfer in August	Receivership needs/skill set match for the sixth (6) grade. Certification is aligned with the instructional needs at PMS as a former instructional ELA coach.	Yes/Yes Principal stated that the teacher objected.	Yes
Holly Dunn	PHS	PMS	Medical Request from Mr. Grover—switching with Mr. Grover (same certification area).	Yes/No	Yes
Shereen Cader	Krieger	Warring- did not transfer in June PMS- did not transfer in August	Receivership needs/skill set match for the sixth (6) grade. Certification is aligned with the instructional needs at PMS.	Yes/Yes Principal stated that the teacher objected.	Yes
Kenneth Conrad	PMS	Warring	Returning from medical leave—certification is aligned with the instructional needs at Warring.	Yes/No	Yes
Andrea Boccio	PMS	Krieger	Certification is aligned with the instructional needs at Krieger.	Yes/No	Yes