UNIVERSITY OF THE STATE OF THE STATE EDUCATION DEPAR	
NICOLE WILLIAMS,	Petitioner,

-against-

Appeal No. 20750

**AFFIDAVIT** 

BOARD OF EDUCATION OF THE POUGHKEEPSIE CITY SCHOOL DISTRICT, SHEREEN CADER, JOHN SAMMON,

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 )

JASON GERARD, being duly sworn, says:

- 1. I am the Principal of Charles B. Warring Elementary School (Warring) in the Poughkeepsie City School District (District). I have worked in the District since 2014 and was given a probationary appointment as Principal in July 2016.
- 2. Prior to my working for the District, I was a tenured building principal in another school district in Westchester County.
- 3. I make this affidavit in earnest, against my own self-interest and with great trepidation. I have only probationary status, and am concerned that Dr. Williams will not recommend me for tenure because of my truthful statement herein.
- 4. On June 15, 2017, I was informed by Dr. Williams that one of Warring's most accomplished educators, John Sammon, was being transferred to Krieger Elementary School. Prior to my accepting the probationary appointment as the Principal of Warring, I was informed by other administrators that Mr. Sammon would be of critical support to the school's success.

Warring, in fact, is currently in the process of being removed as a "Priority School." The directive to switch Mr. Sammon came entirely out of left field. I informed Dr. Williams of my strenuous objection to this transfer and requested an explanation for it. The only explanation that was given was that Mr. Sammon needed to be challenged by being transferred to another school and to teach another grade. This explanation makes no educational sense, as Mr. Sammon is instrumental in our building Transformation Team and is known for being a teacher's teacher. Again, we are "Priority School," so moving Mr. Sammon was a great education detriment to the children in our school.

- 5. The Board of Education subsequently issued a moratorium on building-to-building transfers. As a result of this moratorium, Mr. Sammon was thought to be able to remain in Warring.
- 6. A great deal of time and effort is spent in placing elementary school children with an appropriately matched teacher. In anticipation of Mr. Sammon remaining in Warring, children who had very specific learning needs and learning styles were carefully placed to be in his class. At the end of August, the school was ready and fully prepared to educate its students as planned, and Mr. Sammon was actually scheduled to help build a STEAM laboratory in Warring. This would have been a significant education benefit to our students.
- 7. On August 28, 2017, mere days before the beginning of school, Dr. Williams directed that Mr. Sammon be transferred to Poughkeepsie Middle School. Dr. Williams provided no explanation for transferring Warring's top educator to the middle school, where he has never previously taught.

- The last minute decision to transfer Mr. Sammon makes no educational sense. 8. Students were hand selected to be in his classroom because of their unique needs and his unique skill set. Dr. Williams' transfer directive eradicated all of that.
- Dr. Williams also directed that a middle school teacher take Mr. Sammon's place. 9. While this teacher is certainly trying his best, he has nowhere near the experience teaching elementary school students as Mr. Sammon, nor does he have the unique skill sets for the particular students that were assigned to this class.

Dr. Williams to date has not provided any explanation whatsoever for why she 10. decided to transfer Mr. Sammon on two separate occasions to two different schools, to two different grade levels.

Sworn to before me this 20 day of October, 2017

Notary Public

SHARON FARRELL Notary Public, State of New York

No. 4990626 Qualified in Dutchess County 20/8