

UNIVERSITY OF THE STATE OF NEW YORK  
THE STATE EDUCATION DEPARTMENT

-----X  
NICOLE WILLIAMS,

Petitioner,

Appeal No. 20750

-against-

**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.

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STATE OF NEW YORK )  
                                      ) ss.:  
COUNTY OF DUTCHESS )

DR. FELICIA WATSON, being duly sworn, says:

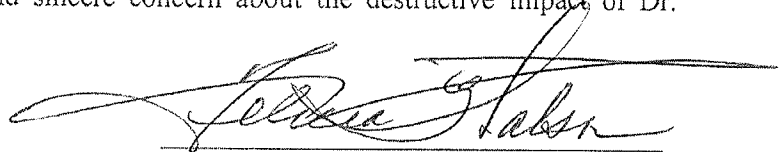
1. I am the President of the Board of Education of the Poughkeepsie City School District (the "District").

2. As indicated in my prior Affidavit, 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.

3. The document annexed hereto as Exhibit "B" was submitted to the Commissioner of Education as Exhibit "B" to Dr. Williams' Reply Affidavit. The first time I saw this document was when I was provided a copy of Dr. Williams' Reply Affidavit. This document materially alters the original chart that was submitted to the Board. Specifically, it adds


information regarding the transfers of Shereen Cader and John Sammon that was never previously provided to the Board. I trust that the Commissioner of Education will give serious attention to the fact that Exhibit "B" to Dr. Williams' Reply Affidavit appears to be manufactured for the purpose of this appeal and that her sworn statement that Exhibit "B" was shared with the Board is demonstrably false.

4. In her Reply Affidavit, Dr. Williams purports to cite educational periodicals regarding the effectiveness of teacher transfers. As demonstrated in the District's Memorandum of Law, Dr. Williams omitted significant passages from the papers she cited that demonstrate the fallacy of her argument. In this regard, annexed hereto as Exhibit "C" is an email from Linda Melton Mann, Interim Assistant Superintendent for Human Resources and Professional Development, expressing bona fide and sincere concern about the destructive impact of Dr. Williams' inexplicable transfers.



DR. FELICIA WATSON

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



Notary Public

Maxine A Patrick  
Notary Public, State of New York  
No. 01PA6317897  
Qualified in Dutchess County  
Commission Expires: 1/12/2019

# 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](mailto:nwilliam@poughkeepsieschools.org)

"Every scholar. Every day. Every classroom."  
"Teamwork makes the dream work."  
"Excellence is our goal."

Sent from my iPhone

**From:** "[BOE] Dr. Felicia Watson" <[fwatson@poughkeepsieschools.org](mailto:fwatson@poughkeepsieschools.org)>  
**Date:** August 30, 2017 at 10:28:10 AM EDT  
**To:** "Dr. Nicole Williams" <[nwilliam@poughkeepsieschools.org](mailto:nwilliam@poughkeepsieschools.org)>  
**Cc:** Board Members <[boe@poughkeepsieschools.org](mailto:boe@poughkeepsieschools.org)>, [jmiller@bsk.com](mailto:jmiller@bsk.com), [hmiller@bsk.com](mailto:hmiller@bsk.com), Stephanie Green <[president@ppsta.org](mailto:president@ppsta.org)>, "Phee Simpson" <[psimpson@poughkeepsieschools.org](mailto:psimpson@poughkeepsieschools.org)>, Andrea Moriarty <[amoriart@poughkeepsieschools.org](mailto:amoriart@poughkeepsieschools.org)>, Jason Gerard <[jgerard@poughkeepsieschools.org](mailto:jgerard@poughkeepsieschools.org)>, "Da'Ron Wilson" <[dwilson@poughkeepsieschools.org](mailto:dwilson@poughkeepsieschools.org)>, Mario Fernandez <[mfernand@poughkeepsieschools.org](mailto:mfernand@poughkeepsieschools.org)>, Linda Melton Mann <[lmann@poughkeepsieschools.org](mailto:lmann@poughkeepsieschools.org)>, Victoria Jackson <[vjackson@poughkeepsieschools.org](mailto:vjackson@poughkeepsieschools.org)>  
**Subject:** Board Approved Resolution #18-0013 & Policy 9420 Is In Complete Effect!

Dr. Williams:

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 overridden 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 <[nwilliam@poughkeepsieschools.org](mailto:nwilliam@poughkeepsieschools.org)> 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](mailto:nwilliam@poughkeepsieschools.org)

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"Teamwork makes the dream work."

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# Poughkeepsie City School District

Delivering on the promise of a high-quality education  
*Every scholar. Every day. Every classroom.*

## “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	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”





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## “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

# Exhibit “C”

**From:** Linda Melton Mann <lmann@poughkeepsieschools.org>  
**Sent:** Friday, September 01, 2017 12:27 PM  
**To:** [BOE] Dr. Felicia Watson; Miller, Howard  
**Subject:** Transfers

Dr. Watson,

As of today I have had several staff members voice their concerns regarding the pending staff transfers to PMS. It appears these changes will have a **major negative impact** on the district.

Although, Dr. Williams mentioned this to me in passing one day, I was never given the entire picture for the transfers or involved in the discussion. However, I did voice my concerns regarding one teacher KC being transferred. It is my belief this transfer will not benefit the academic needs of the students at Warring. If you review KC's personnel file it will provide you with a clear understanding regarding why he should not be transferred.

It should be noted these transfers were not to the best of my knowledge discussed previously with the principals in order to present a plan that would be in the best interest of the staff, students and community. If one wants the entire district to achieve academic success, it is imperative for all stakeholders to be at the table. Was a detailed plan created for all to review and provide information in the best interest of our students? Until a suitable plan is developed where everyone has input, **transfers should not move forward.**

I have been Interim Assistant Superintendent for 15 days and the transfer situation is causing a major concern for the opening day of school. **At this time, I believe it is in the best interest of the PCSD that the transfers be withdrawn.**

Yours for children and education.

--

Mrs. Linda Melton Mann,  
Interim Assistant Superintendent for Human Resources and Professional Development

This message may contain confidential information and is intended only for the individual(s) named. If you are not an intended recipient you are not authorized to disseminate, distribute or copy this e-mail. Please notify the sender immediately if you have received this e-mail by mistake and delete this e-mail from your system.