

THE FLORIDA SENATE

IN RE: SUSPENSION OF
MARY BETH JACKSON

Executive Order No. 19-13

SUPERINTENDENT JACKSON'S WITNESS AND EXHIBIT LIST

COMES NOW, Mary Beth Jackson, Superintendent of Schools for Okaloosa County, Florida, and files this Witness and Exhibit List pursuant to Florida Senate Rule 12.9 and Special Master Dudley's letter dated April 19, 2019, and states as follows:

WITNESSES

1. Mary Beth Jackson
c/o undersigned counsel

Ms. Jackson will offer testimony regarding her actions and knowledge relating to the Okaloosa County School District, including specifically her knowledge and actions as Superintendent, in defense of the allegations raised against her in Executive Order 19-13.

2. Marcus Chambers
c/o Okaloosa County School District

Mr. Chambers will be asked to testify regarding his knowledge of Okaloosa County Schools, including his role as Assistant Superintendent for Okaloosa County Schools where he had oversight of the ESE programs beginning in or before 2015, as well as his oversight of Human Resources beginning in January 2018. Mr. Chambers will also be asked to testify regarding his actions as acting Superintendent of Okaloosa County Schools since taking over that position in early 2019.

3. Rita Scallan
c/o Okaloosa County School District

Ms. Scallan is the CFO for the Okaloosa County School District. Ms. Scallan will offer testimony regarding the budgeting process and the additional funds that have been allocated to various programs during Ms. Jackson's tenure, including specifically the funding for and focus on additional resources for the ESE programs.

4. Karen Peek
c/o Okaloosa County School District

Ms. Peek is the Program Director within the Office of Professional Services of the Okaloosa County School District. Ms. Peek will offer testimony regarding the training protocols within Okaloosa County School District, including the various training materials and other information provided to teachers and staff of the District.

5. Teresa Gomez
c/o Florida Department of Children & Families

Ms. Gomez is with the Department of Children and Families. Ms. Gomez will offer testimony regarding the process of reporting child abuse and her knowledge of the Marlynn Stillions investigations.

6. Jenny Hess
c/o Department of Children & Families

Ms. Hess is an investigator with the Department of Children and Families who conducted the investigations into the Marlynn Stillions allegations. Ms. Hess will offer testimony regarding the Marlynn Stillions investigations, including the findings and conclusions resulting from those investigations.

7. [REDACTED]
c/o Okaloosa County Sheriff's Department

[REDACTED] is an investigator with the Okaloosa County Sheriff's Department. [REDACTED] will offer testimony regarding the Sheriff's Office investigation of Marlynn Stillions.

8. [REDACTED]

[REDACTED] will offer testimony regarding [REDACTED] knowledge of and interactions with Marlynn Stillions, including [REDACTED] knowledge of the allegations of abuse against Ms. Stillions.

9. [REDACTED]

[REDACTED] will offer testimony regarding [REDACTED] assertions in [REDACTED] affidavit and prior investigations by DCF related to allegations of abuse.

10. Jeff McInnis
c/o Okaloosa County School District

Mr. McInnis serves as counsel to the Board. In that role, Mr. McInnis has conducted numerous trainings over the past several years regarding DCF and reporting of suspected child abuse, including training preceding the 2015-2016 school year. Mr. McInnis will offer testimony regarding his role in such trainings and the presentations that he has given to District personnel over the prior several years.

11. Teresa Schroeder
c/o Okaloosa County School District

Ms. Schroeder serves as the Program Director for Student Intervention Services for the District. Ms. Schroeder will offer testimony relating to training of District personnel, including in the area of child abuse investigations and reporting, as well as posting of notices regarding reporting of child abuse.

12. [REDACTED]
c/o Okaloosa County School District

[REDACTED] and will testify concerning [REDACTED] prompt reporting of allegations of abuse or neglect to DCF.

13. Melody Sommer
c/o Okaloosa County School District

Ms. Sommer serves as the Program Director for the Exceptional Student Education program. Ms. Sommer will offer testimony concerning training provided to staff and receipt of information related to the Stillions investigation.

14. Any persons deposed in this proceeding.
15. Any persons listed by other parties as witnesses.
16. Any persons called as witnesses by other parties.
17. Any persons who may be necessary to authenticate documents or testify regarding hearsay or other objections.
18. Any rebuttal and/or impeachment witnesses.

EXHIBITS

Superintendent Jackson's Exhibit List is attached hereto as Exhibit A.

SUMMARY STATEMENT

Superintendent Jackson has set forth her denials, defenses and position in detail in her Response to Governor Desantis' Bill of Particulars, which Response is incorporated herein by reference. The testimony and exhibits will demonstrate that the allegations against Superintendent Jackson as set forth in Executive Order 19-13 and the Governor's Bill of Particulars are false or otherwise fail to establish that Superintendent Jackson has neglected her duty as Superintendent or has otherwise exhibited incompetence. The evidence will demonstrate that there was no lack of policies or procedures in place prior to the Stillions issue. The evidence will also establish that the District engaged in widespread and persistent training of District

personnel, including prior to the Stillions incident, on a plethora of issues, including but not limited to child abuse reporting and crisis intervention.

The evidence will also demonstrate that after the Stillions issue came to light, those policies were further strengthened. Personnel changes were made, including placing Marcus Chambers in charge of Human Resources in January 2018. Even more training was demanded, including inviting DCF to conduct training within the District. These efforts further demonstrate that there was no neglect of duty or incompetence on the part of Superintendent Jackson.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on April 22, 2019, a true copy of the foregoing has been filed via email with Dudley Goodlette, Special Master, Goodlette.Dudley@flsenate.gov, and served via email to Nicholas Primrose, Counsel for the Governor, nicholas.primrose@eog.myflorida.com.

/s/ George T. Levesque _____

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