



RON DESANTIS  
GOVERNOR

STATE OF FLORIDA  
**Office of the Governor**

THE CAPITOL  
TALLAHASSEE, FLORIDA 32399-0001

www.flgov.com  
850-717-9418

THE FLORIDA SENATE

In re: Executive Order of Suspension, Number 19-13  
Suspension of Ms. Mary Beth Jackson, Superintendent of Schools  
Okaloosa County, Florida

**GOVERNOR DESANTIS' WITNESS & EXHIBIT LIST**

**COMES NOW**, the Executive Office of Governor Ron DeSantis, by and through Deputy General Counsel, Nicholas Primrose, and files this Witness & Exhibit List pursuant to Florida Senate Rule 12.9, Special Master Dudley's letter dated February 4, 2019, and the Parties proposed schedule submitted to Special Master Dudley on April 17, 2019 and states as follows:

**WITNESSES**

1. Teresa Gomez (via deposition transcript)  
c/o Florida Department of Children & Families

Ms. Gomez was deposed by both parties on February 27, 2019. She provided testimony about the process of reporting child abuse and her knowledge of the Marlynn Stillions incident.

2. Karen Peek (via deposition transcript)  
c/o Okaloosa County School District

Ms. Peek was deposed by both parties on February 27, 2019. She provided testimony about the training protocols within the Okaloosa County School District, including what materials are provided to teachers and staff.

3. Marcus Chambers (via deposition transcript)  
c/o Okaloosa County School District

Mr. Chambers was deposed by both parties on February 27, 2019. He provided testimony about the Okaloosa County School District, his knowledge about the Marlynn Stillions incident, and his opinions as to the allegations listed in Executive Order 19-13.

4. Randy Kosec  
c/o Florida Department of Education

Mr. Kosec is the Chief of the Office of Professional Practices for the Florida Department of Education. He will provide testimony regarding his knowledge of the Marlynn Stillions and Roy Frazier investigations. He will also provide testimony about the Department of Education's Office of Professional Practices interactions with local school districts for investigating teacher conduct.

5. Monica Verra-Tirado, Ed.D.  
c/o Florida Department of Education

Dr. Verra-Tirado is the Bureau Chief for the Bureau of Exceptional Education and Student Services for the Florida Department of Education. She will provide testimony as to her site visits to Silver Sands and Kenwood Elementary schools. She will also provide testimony as to her knowledge regarding the Marlynn Stillions incident and investigation. She will also provide testimony as to Florida Statute § 1003.573 compliance related to Okaloosa County School District.

The Executive Office of Governor Ron DeSantis reserves the right to call any of the above-named witnesses via affidavit, sworn statement, deposition transcript and/or live testimony.

### **EXHIBITS**

- A. Composite of Relevant Florida Statutes §§ 39.201, 1001.32, 1001.41, 1001.42, 1001.49, 1001.51, 1006.061, 1012.27, 1012.796
- B. Deposition Transcripts
1. [REDACTED] dated April 13, 2018
  2. Teresa Gomez, dated April 13, 2018
  3. Mary Elias-Evans, dated April 13, 2018
  4. Wanda Mercer, dated May 14, 2018
  5. Melanie Smith, dated May 14, 2018
  6. [REDACTED], dated June 21, 2018

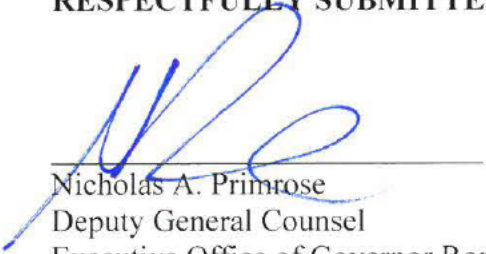
7. Jenny Hess, dated June 21, 2018
  8. Arnold Brown, dated July 20, 2018
  9. Marcus O'Sullivan, dated July 20, 2018
  10. Stacie Smith, dated August 17, 2018
  11. Kristina Fernandez, dated August 17, 2018
- 
- C. Transcript of Interview of Stacie Smith, dated March 19, 2018
  - D. Kenwood Elementary School Faculty & Staff Handbook for 2015-2016
  - E. Investigative Summary Report and its supplemental exhibits – Roy Frazier, dated March 5, 2016
  - F. Investigative Summary Report and its supplemental exhibits – Marlynn Stillions, dated June 17, 2016
  - G. Memo to the Equity File – Marlynn Stillions, dated August 1, 2016
  - H. Notes from May 19, 2016 meeting at Kenwood Elementary School
  - I. E-mail and attachments from Mary Elias-Evans to Arden Farley, May 2016
  - J. Statements regarding Marlynn Stillions, dated May 26, 2016
  - K. E-mail and attachments from Arden Farley to Brandi Hand, dated June 16, 2015
  - L. E-mail and attachments from Angelyn Vaughan to Arden Farley, Stacie Smith, [REDACTED] and Joan Pickard, dated May 18, 2016
  - M. E-mail and attachments from Arden Farley to Stacie Smith, dated May 30, 2016
  - N. E-mail and attachments from Arden Farley to [REDACTED] and Melody Sommer, dated June 16, 2016
  - O. E-mail and attachments from Arden Farley to Stacie Smith and Brandi Hand, dated June 17, 2016
  - P. E-mail and attachments from Arden Farley to Stacie Smith, dated July 6, 2016
  - Q. E-mail chain between Arden Farley to Stacie Smith, dated July 15, 2016
  - R. E-mail chain between Lee Hale and Stacie Smith, dated July 11, 2016
  - S. E-mail chain between Joan Pickard and Stacie Smith (cc: Mary Beth Jackson), dated July 18, 2016

- T. E-mail and attachment from Arnold Brown to Mary Beth Jackson, dated May 18, 2017
- U. E-mail from Andy Johnson to Stacie Smith (cc: Mary Beth Jackson), dated May 18, 2016
- V. E-mail and attachments from Brandi Hand to Stacie Smith, dated May 12, 2017
- W. E-mail from Lindsay Maxey dated July 6, 2016
- X. E-mail from Marlynn Stillions to Stacie Smith, dated July 15, 2016
- Y. Affidavit of [REDACTED]
- Z. Okaloosa County Grand Jury Reports
- AA. Okaloosa County Sheriff's Office Offense Report
- BB. Marlynn Stillions' Personnel File
- CC. Florida Department of Education Office of Professional Practices Services File on Roy Frazier (redacted to protect exempt information)
- DD. Florida Department of Education Office of Professional Practices Services File on Marlynn Stillions (redacted to protect exempt information)
- EE. Composite Okaloosa County School District Polices
- FF. Okaloosa County Exceptional Student Education Policies and Procedures
- GG. Okaloosa County School District Organization Chart (2015-2016)
- HH. SP&P Signature Page and attachments for Okaloosa County for 2014-2019
- II. 2018-2019 Exceptional Student Education On-Site Monitoring Report Okaloosa County School District
- JJ. Warrant Reports for Margaret Wolthers, Diana Lacroix, and Carolyn Madison
- KK. Any and all documents provided by Okaloosa County School District in response to any subpoena issued by the Florida Senate
- LL. Any and all documents provided by Florida Department of Education in response to any subpoena issued by the Florida Senate
- MM. Any and all documents provides by Florida Department of Children and Families in response to any subpoena issued by the Florida Senate



The Executive Office of Governor Ron DeSantis intends to show that Mary Beth Jackson, as the Superintendent of Okaloosa County School District, had certain statutory duties and responsibilities. The exhibits will show that starting in February 2016, reports of alleged child abuse were known to Mary Beth Jackson and she did not follow her statutory responsibilities. The exhibits will also show a lack of education and training for the faculty and staff members within the school district, which led to a failure to report suspected child abuse to Department of Child & Families. The School District policies will show deficiencies in policy to notify the parents of any child who was suspected to have been abused. Furthermore, the exhibits will show that Mary Beth Jackson knew or should have known about the suspected child abuse and failure to report child abuse, but failed to take any appropriate action against the teacher or fix the deficiencies until the summer of 2017, once a criminal investigation was initiated. The exhibits will show that even though it was recommended that a teacher be referred to the Florida Department of Education's ("DOE") Office of Professional Practices in June 2016, Mary Beth Jackson recommended no discipline and failed to notify DOE about the allegations. Finally, the exhibits will show that the issues at Okaloosa County School District rose to the level of criminal conduct, and that as late as Fall 2018 there were still issues with child abuse and failure to report suspected child abuse in the school district.

**RESPECTFULLY SUBMITTED,**



Nicholas A. Primrose  
Deputy General Counsel  
Executive Office of Governor Ron DeSantis

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on this 18th day of April, 2019, a true copy of the foregoing has been e-mailed to counsel for Ms. Mary Beth Jackson: George Levesque, Esq. (George.levesque@gray-robinson.com).