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CIVIL DISTRICT COURT
PARISH OF ORLEANS
STATE OF LOUISIANA

DARNETTE DANIELS, * NO. 2019-6895
INDIVIDUALLY AND ON *
BEHALF OF HER MINOR *
CHILD, TAYLER McCLENDON * DIVISION "G"
*
*

VERSUS

STATE OF LOUISIANA, ET *
AL *
*

Deposition of **RAPHAEL GANG**,
2404 Cromwell Drive, Minneapolis, Minnesota
55410, taken via Zoom videoconference on
Thursday, the 3rd day of September, 2020 at
10:00 a.m.

APPEARANCES:

THE BAGNERIS FIRM, LLC
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1 template standard that's pretty standardized
2 across schools, except for the specific
3 details like the address of the school and
4 the name of the school, things like that.

5 Q. Okay. Can you tell me what it
6 means to be a Type 3B charter school?

7 A. Could you be more specific?

8 Q. In this document, it refers to
9 Kennedy as a Type 3B charter school. I
10 understand there's Type 5 charter schools
11 and -- there's different types. I'm just
12 trying to understand what the designation 3B
13 means. If you don't know, it's okay. But,
14 you know, I understand there's a Type 1, a
15 Type 3, a Type 3B, a Type 5. I'm just trying
16 to understand what a Type 3B is.

17 A. My understanding of it is that Type
18 3B charters are schools that formerly were
19 Type 5 charters under the Recovery School
20 District, and were then transferred as part
21 of a state law that was passed a few years
22 ago back to -- back to the auspices of the
23 Orleans Parish School Board.
24 And so, when they returned to the Orleans
25 Parish School Board, they became Type 3Bs.

1 And so that meant that the authorizer
2 switched from being the State Department of
3 Education and BESE to being the Orleans
4 Parish School Board, and -- but that's the --
5 and the only other key thing, which is
6 actually where you are in the document, is
7 that we are -- each of the schools that are
8 authorized as Type 3Bs are, for the purposes
9 of funding and other things, their own local
10 education agencies.

11 Q. And that was going to be my next
12 question to you. The local education agency
13 status, that's really more so a function of
14 how it's funded, correct?

15 A. I'm not -- I'm not a lawyer, so I
16 wouldn't speak too much detail about it. It
17 has implications across a variety of issues,
18 but one of those issues is funding, yeah.

19 Q. Is your role as the board chair
20 very different from the role of a board
21 member? What do you do as board chair?

22 A. So what do I do as a board chair?
23 I think I have two to three specific things
24 that I spend most of my time working on. So
25 the first, like I said earlier, is really

1 the areas of programming, instruction,
2 curriculum, materials and texts, yearly
3 school calendars and daily schedules, hiring
4 and firing of personnel, employee performance
5 management and evaluation, terms and
6 conditions of employment, teacher or
7 administrator certification, salaries and
8 benefits, retirement, collective bargaining,
9 budgeting, purchasing, procurement, and
10 contracting for services other than for
11 capital repairs and facilities construction."

12 And what I'm asking you is, in
13 practice, did the authorizer, the Orleans
14 Parish School Board, allow New Beginnings
15 Schools Foundation as a charter operator
16 autonomy in all of the areas stated in
17 section 1.9 of the Charter School Agreement?

18 A. I never witnessed or was part of
19 any instance in which they violated section
20 1.9.

21 Q. Okay. In section 2.1 -- and would
22 you agree that all of those areas as outlined
23 in section 1.9 were things that were the
24 responsibility of New Beginnings Schools
25 Foundation and not the Orleans Parish School

1 Board?

2 A. Yes.

3 Q. Section 2.1 of the Charter
4 Operating Agreement states that "the Charter
5 Operator," which would be New Beginnings,
6 "shall have control over and responsibility
7 for delivery of the Educational Program and
8 attainment of the academic performance
9 standards as set forth in Orleans Parish
10 School Board Policy HB." I'm assuming that
11 means handbook, is that correct? What is HB?

12 A. I'm not expert on OPSB policy. I
13 believe that's just like literally the naming
14 convention that they use. I don't know what
15 the HB stands for.

16 Q. Okay. "Oversight and evaluation of
17 charter schools and the CSAF." Can you tell
18 me what CSAF stands for?

19 A. I believe it's defined earlier in
20 the document, but I believe it stands for
21 Charter School Accountability Framework.

22 Q. Okay. So do you possess this
23 Orleans Parish School Board policy and CSAF
24 as set forth in this Charter School
25 Agreement?

1 A. I've reviewed it. I don't keep it
2 on me as something that I need to look at on
3 a daily basis, but I've reviewed it and I've
4 sat through sessions where the Orleans Parish
5 School Board has walked charter boards
6 through the CSAF and answered questions that
7 board members may have about it.

8 Q. Okay. So what are -- this seems
9 like a limiting comment. So what does it
10 mean that you need to abide by these academic
11 performance standards? What type of
12 performance standards were you bound to abide
13 by?

14 A. I mean, the CSAF has a pretty
15 specific set of requirements around the
16 performance of students in them. So the
17 simple answer to that is, we were expected to
18 raise the letter grade performance of the
19 school overall over a period of the charter
20 contract -- over the period of the charter
21 contract. And so the CSAF delineates that in
22 fairly specific terms of different metrics
23 that they expect us to achieve over the
24 course of the charter term. The most
25 important one is the letter grade of the

1 already knew this was going to happen if
2 nothing was done as of 2016?

3 A. We weren't aware of any of the
4 problems with regard to student transcripts
5 or records or on time for graduation until it
6 was brought to our attention in the spring of
7 2019.

8 Q. Would it surprise you to know that
9 counselors Ashlei DeLarge and Kimberly Owens
10 began tracking on a spreadsheet all of these
11 individual deficiencies for the class of 2019
12 as early as the 2016-2017 school year?

13 A. No.

14 Q. All right. Getting back to this
15 Charter Agreement. In section 2.4, it
16 discusses the Pupil Progression Plan. And it
17 says: "The Charter School shall adopt a
18 Pupil Progression Plan consistent with the
19 Louisiana Board of Elementary and Secondary
20 Education Bulletins 1566, 741 and 1706."

21 I note, jumping forward to now, that
22 the Louisiana Department of Education cited
23 Kennedy for failure to update these Pupil
24 Progression Plans. Do you have any
25 explanation as to why they were not updated?

1 A. The Pupil Progression Plan that we
2 had for a high school was presented to us by
3 the CEO and reviewed by the CEO and the CEO's
4 team. We were assured that it was
5 up-to-date, and our board didn't see any
6 glaring weaknesses in it at the time. And so
7 we approved it and it was submitted.

8 Q. Okay. So, again, the board was
9 provided information by the CEO, Michelle
10 Blouin-Williams, that it was up-to-date, and
11 you relied upon that?

12 A. Yes.

13 Q. Okay. Section 3.3 of the Charter
14 School Agreement relates to Non-Retaliation.
15 "Charter school shall not retaliate in any
16 manner against an employee, parent or legal
17 guardian, or student who raises a suspected
18 violation of law, cooperates in inquiries or
19 investigations, or identifies potential
20 violations to Charter School, Charter
21 Operator, Orleans Parish School Board, the
22 Louisiana Legislative Auditor and/or Board of
23 Ethics, or any other appropriate governmental
24 agency."

25 Do you stand by that provision in

1 A. The board voted last summer, I
2 forget the exact meeting, to surrender the
3 charters at the end of the 2019-2020 school
4 year. So it was not revoked by the Orleans
5 Parish School Board. We surrendered the
6 charters.

7 MS. BAGNERIS:

8 I'm going to mark this Charter
9 School Agreement as Exhibit A to
10 the deposition.

11 (Whereupon, the instrument referred to was
12 marked Exhibit A for identification.)

13 EXAMINATION BY MS. BAGNERIS:

14 Q. So you mentioned earlier school
15 performance scores. In this case, it's my
16 understanding that Kennedy, in the 2018-2019
17 academic school year, was graded F based on
18 standardized test performance alone, but its
19 graduation rate score was 84.9, which is a B.
20 So, overall, the school was rated C. And
21 that would have won you charter renewal.
22 Would you agree with me that the more
23 students that Kennedy had to graduate, the
24 better your performance score would have
25 been?

1 A. I would say that's a mathematical
2 reality of the way that the accountability
3 system is set up for all schools, which is
4 that, the greater the number of students that
5 graduates on time, the higher the score the
6 school receives overall. And that's any
7 school in the State of Louisiana.

8 Q. All right. We're going to move
9 forward now to February of 2019. It's my
10 understanding that in February of 2019, the
11 Orleans Parish School Board received written
12 notification alleging improper grade
13 changing, mishandling of the investigation,
14 grievance mishandling and employee
15 retaliation related to Dr. King. Did the
16 Orleans Parish School Board communicate to
17 the New Beginnings Foundation's board its
18 receipt of this written notification from Dr.
19 King in February of 2019?

20 A. I don't recall the specific back
21 and forth that we had with the Orleans Parish
22 School Board. I know that our CEO was in
23 direct contact with the Orleans Parish School
24 Board while -- about that specific complaint
25 that was alleged by Dr. King.

1 of the schools were met, similar to kind of,
2 you know, what a CEO would be doing to make
3 sure that students were learning, that our
4 finances were correct and moving forward, and
5 that our -- you know, the operations side of
6 the organization were working. So they
7 were -- they were essentially working as a
8 team to do what a CEO would do otherwise.

9 Q. Okay. It's my understanding that
10 the Orleans Parish School Board had Amanda
11 Aiken and Kelli Peterson at your board
12 meeting on March 28, 2019. Is that correct?
13 Were they there?

14 A. I don't recall specifically, but I
15 would assume that -- it would make sense that
16 they were there, but I don't recall the
17 specific meetings that they were or weren't
18 at.

19 Q. Why would it make sense to you that
20 they were there at that meeting?

21 A. Given the allegations that were
22 made, it was fairly typical if something like
23 that, if those kinds of allegations were
24 made, that the Orleans Parish School Board is
25 in touch and active in making sure that the

1 board understands its responsibility and its
2 obligations. And so, you know, in other
3 situations that I've been in, the board, you
4 know, they make their presence, they attend
5 those meetings, they make sure that people on
6 the board are aware that they are overseeing
7 the situation and closely monitoring it and
8 being supportive where they can be.

9 Q. Was there any particular reason why
10 the board's attorney, Michelle Craig, was not
11 present at the meeting where you decided to
12 hire Adams and Reese and were discussing the
13 two very serious allegations of grade
14 inflation and falsification of public
15 documents related to the bus contract?

16 A. I don't recall.

17 Q. Was there a reason why the New
18 Beginnings board did not grant Dr. Runell
19 King's request to be placed on the March 28,
20 2019 emergency board meeting agenda to
21 discuss the grade inflation allegations that
22 he raised in that public forum, where there
23 could be transparency with the parents and
24 the students?

25 A. The board felt that we had an

1 doing. So it wasn't -- given the situation
2 and the nature of all the challenges that we
3 were facing, it wasn't in my mind unusual to
4 have more communication than I would
5 otherwise if we were in kind of traditional
6 times where there weren't any, you know, big
7 issues happening at the school.

8 Q. It's my understanding that Michelle
9 Blouin-Williams resigned on May 6, 2019,
10 formally, with her letter of resignation, and
11 that within days of her doing that, five
12 administrators at Kennedy were no longer
13 employees of the network. Can you tell me
14 which five administrators were no longer
15 employees of the network?

16 A. I honestly don't remember all of
17 their names at this point. It's been over a
18 year. And since I wasn't very familiar with
19 them to begin with, I -- I don't remember all
20 of them. I believe some of them were Taisha
21 Payne, Brian Gibson, Miss Coleman. I don't
22 remember the other names.

23 Q. Okay. And were they terminated or
24 did they resign?

25 A. They were terminated.

1 Q. Okay. Why did you terminate Taisha
2 Payne?

3 A. I believe that is directly
4 connected to the investigation with our
5 lawyers, and so I don't believe I can answer
6 that.

7 MR. CLARK:

8 You can explain the grounds for
9 your termination to Miss Bagneris.

10 That's fine.

11 THE WITNESS:

12 Okay.

13 MR. CLARK:

14 Because that's -- that's -- what
15 you told them was -- (inaudible) --
16 so you can explain that.

17 MS. BAGNERIS:

18 Okay.

19 THE WITNESS:

20 Okay. Okay.

21 EXAMINATION BY MS. BAGNERIS:

22 Q. Why did you terminate Miss Payne?

23 A. We've been provided evidence that
24 showed that she had behaved unethically with
25 regard to students, and violated school and

1 state policies. And so we -- you know, we
2 felt that she had no right to continue
3 working with us. And all of our employees
4 are at-will employees. And so we took
5 action.

6 Q. Okay. When you say behaved
7 unethically, that is pretty broad. What do
8 you mean by that?

9 A. We received evidence and
10 information that showed that Miss Payne had
11 failed to adhere by state and school policies
12 around data and student information, and had
13 violated those policies willfully.

14 Q. I'm going to have to ask
15 specifically. Did you find that she changed
16 these grades?

17 MS. CRAIG:

18 Suzette, are you referring to what
19 Runell King alleged? Are you
20 asking if she changed the grades?

21 MS. BAGNERIS:

22 Look, I understand there are -- I'm
23 trying to read through your
24 documents and understand what the
25 hell happened. Okay?

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MS. CRAIG:

Yeah. And I'm not trying to give you a hard time either. I just want to make sure Raphael understands what you're asking him. Are you asking if she changed the grades that Runell King was talking -- I think he needs some clarity, because I don't want him speculating about information.

MS. BAGNERIS:

Y'all are making me pull teeth here, but fine.

EXAMINATION BY MS. BAGNERIS:

Q. So I understand that there was a first set of investigations based upon what Runell King told you, and that Adams and Reese found that to be inconclusive. At least that's what I read in the School Board and LDOE's documents. Then I understand, after that, you all got new information. I don't know who you got it from, because the documents don't say, but you all received new information and you called it a second grade changing investigation, I don't even know

1 what that means. And that, as a result of
2 that, these five people were fired. So I'm
3 trying to find out, what new information did
4 you get? Let's back up to that. What new
5 information did you get after the first
6 investigation that made you continue to
7 investigate grade inflation?

8 A. The information that we received as
9 part of -- the information that we received
10 indicated that there was a separate instance
11 outside of the allegations that Dr. King
12 made, where this individual, as well as some
13 of the other individuals you're referring to,
14 violated state and school policy around
15 student data and student information.

16 MR. CLARK:

17 Why don't you walk her through
18 exactly what precipitated their
19 firing her, so she doesn't have to
20 pull teeth. Because I agree with
21 her, she just needs to know why
22 they were fired.

23 THE WITNESS:

24 Got it.

25 EXAMINATION BY MS. BAGNERIS:

1 Q. Right. I can get it now or I can
2 ask the court for leave to depose you again.
3 I really don't want to have to do that.

4 MS. CRAIG:

5 Suzette, he's not trying to be
6 difficult.

7 I think, as Scarth said, you know,
8 Raphael, proceed.

9 Suzette, he's not trying to be
10 difficult, so we don't want you to
11 get that indication, nor do we want
12 to bother the judge with a motion
13 if we can get you the information
14 that you're trying to get here.

15 MS. BAGNERIS:

16 I don't want to do that. I want to
17 just -- I want transparency, what
18 you promised.

19 EXAMINATION BY MS. BAGNERIS:

20 Q. What I want to know is, what did
21 you learn after the first investigation,
22 okay, that prompted you to continue to
23 investigate this?

24 A. Yeah. So directly prior to the
25 graduation process, we received information

1 from the team that there had been individuals
2 that were accessing our data systems
3 improperly. And this was literally, I
4 believe, 48 to 72 hours prior to graduation
5 happening. When we found out about these
6 allegations, the board worked with our
7 lawyers, with Adams and Reese, and with the
8 team to investigate and learn more about
9 this separate instance where there was grade
10 changing that appeared to be happening, that
11 we couldn't confirm, but that we saw things
12 that were very suspicious that were happening
13 in the data systems directly prior to
14 graduation. At that point, we locked down
15 the system so that no one could tamper with
16 the data in the system any further. We --
17 and this was directly prior to graduation, on
18 the day of graduation, that this happened,
19 and launched a second investigation into what
20 had happened during the course of, basically,
21 the 72 to 96 hours prior to graduation.

22 What was revealed to us in that
23 separate investigation, that was not on our
24 radar at all when the initial investigation
25 happened, was that there was a series of

1 individuals who had been accessing and
2 altering student records and data improperly,
3 and that those individuals were doing that
4 specifically to help students graduate who
5 were otherwise ineligible to graduate. When
6 we received this information, and it was
7 confirmed to us that a certain set of
8 individuals had done that, we immediately
9 terminated those employees.

10 Q. Okay.

11 A. And launched a further
12 investigation, where we then audited every
13 single student record to ensure that every
14 student that was graduating and had received
15 a diploma was correctly receiving a diploma
16 and was correctly getting what they were
17 entitled to. And that was what then made a
18 lot of newspaper headlines, which said that
19 half of John F. Kennedy's class was
20 ineligible to graduate.

21 Q. Okay. Now I understand --

22 A. And all of that -- and all that
23 happened -- I want to just be really clear
24 about this point. All of that happened
25 within, basically, 72 to -- not even 96

1 hours, 72 hours of graduation happening. And
2 so, the things that were happening in March
3 and December with the allegations that were
4 made around the initial grade changes by Dr.
5 King, and the bus contract, those were two
6 completely separate events that had nothing
7 to do, in our minds, and that we were un --
8 that there was no connection between that and
9 the things that were happening directly
10 around graduation. That expanded the scope
11 of the investigation, though, to cover all of
12 the things that were happening in and around
13 graduation. And that process took
14 significantly more time and resources because
15 it involved many, many more students, many,
16 many more people, much more complex data
17 systems and things like that.

18 Q. So I guess the ramification or the
19 result of what was done in the last 96 hours
20 before graduation was to increase the number
21 of students that were on the list as being
22 eligible to graduate?

23 A. There was a public-facing record,
24 which was basically the graduation, you know,
25 um, pamphlet that was handed out to families

1 that said your child is going to graduate.
2 That document was handed out weeks ahead of
3 graduation.

4 What became clear to us was that the
5 students -- there were students that were on
6 that list who were not eligible to graduate,
7 and that various individuals inside John F.
8 Kennedy knew were ineligible to graduate, and
9 were going to falsify records in order to
10 make them eligible to graduate. When we
11 caught them doing this, that then called into
12 question every student in the class and
13 whether they were eligible to graduate,
14 because we couldn't distinguish between which
15 students they had falsified and which
16 students they hadn't falsified records for.

17 So then we did an extremely
18 thorough, extremely thorough, I cannot
19 emphasize that enough, audit of every single
20 student's transcripts, literally from the
21 moment they entered high school to the moment
22 they graduated. I don't think an audit as
23 thorough as that has ever been conducted on
24 student transcripts at that scale in the
25 State of Louisiana. And the goal of that

1 audit was to ensure that every student who
2 received a diploma was entitled to that
3 diploma and was correctly receiving it. And
4 if a student wasn't eligible yet to receive a
5 diploma, we had clear information about what
6 the gaps were in their transcripts, so that
7 then we could take appropriate action to get
8 them their diploma and get them ready to
9 graduate as soon as possible. Without
10 accurate data, we, as an organization, had no
11 way of helping the students. And so the
12 audit was extremely, extremely thorough, and
13 it revealed lots and lots of challenges for
14 many students.

15 Q. Wow. Well, that helps me to
16 understand the delay in getting these people
17 their diplomas and transcripts a little
18 better.

19 A. I mean --

20 Q. Yeah. I mean --

21 A. -- I'll just say that, like, last
22 summer when you were requesting information
23 for specific students and wanting those
24 students to be able to graduate and things
25 like that, the amount of work that our team

1 was putting in on the back end for those
2 students was Herculean, but it was just a
3 tremendous number of students that we
4 discovered challenges with. And it went --
5 it -- the amount of damage that those
6 individuals did to those students was
7 significant. And it called into question
8 everything, which forced us to do an
9 extremely thorough process so that we could
10 have certainty and make sure that when we
11 told students, this is what you need to do to
12 graduate, there was absolutely no doubt that
13 this is what they needed to do to graduate.

14 We could not bear the thought of
15 giving inaccurate information to families,
16 after they had already been through such an
17 ordeal. And we recognized that that caused
18 them pain because they were being forced to
19 wait, but we thought that the only thing that
20 would probably be worse than forcing them to
21 wait was to give them inaccurate information,
22 for them to arrive at a college campus
23 or arrive at somewhere that they wanted to
24 be, and then still not have a diploma,
25 because the State Department of Education

1 would not certify that that student was
2 actually eligible to graduate. Because the
3 state ultimately has to verify that the
4 student is eligible to graduate. And if the
5 state didn't do that, then that student
6 was -- you know, wasn't going to be able to
7 be on campus and do the things anyway.

8 So the most important thing for us
9 to do, once we found out what those
10 individuals had been doing, was to take
11 action at a level that was honestly pretty
12 unprecedented.

13 Q. Mr. Gang, were you ever made aware
14 that Brian Gibson and Taisha Payne were
15 accused of doing something very similar when
16 they worked at Landry-Walker?

17 A. I was not made aware of that
18 directly. When they were -- when -- I was
19 not made aware of when Miss Payne was even
20 hired. I didn't know that Miss Payne had
21 been hired until allegations were actually
22 made against Miss Payne, because she started
23 mid-year at John F. Kennedy.

24 When Mr. Gibson was hired, I was
25 told by our CEO at the time that I might hear

1 appears like in this letter, is things that
2 we reported to NOLA Public Schools as part of
3 our ongoing communication with them.

4 MS. BAGNERIS:

5 I'd like to attach this letter from
6 NOLA Public Schools as Exhibit M to
7 the deposition.

8 (Whereupon, the instrument referred to was
9 marked Exhibit M for identification.)

10 EXAMINATION BY MS. BAGNERIS:

11 Q. Were you -- I found this curious,
12 and I just wanted to know if you were aware.
13 This is Brian Gibson's offer letter to be
14 principal. Did you ever see the offer
15 letters that were sent out?

16 A. No. I've never seen offer letters
17 from anybody except for our CEO.

18 Q. Okay. Did you know that in the
19 offer, there's a \$5,000 incentive based upon
20 school's performance?

21 A. No, I did not.

22 MS. BAGNERIS:

23 I'd like to attach this as Exhibit
24 N to the deposition.

25 (Whereupon, the instrument referred to was

1 A. There are a lot of sub ways that
2 they can be, but, nominally, those are the
3 two; those are the two avenues, yes.

4 Q. Okay. And when a school is
5 chartered by BESE, are there certain actions
6 by BESE with regard to how that school is
7 operated that don't exist when a school is
8 chartered by the local school board, like the
9 Orleans Parish School District?

10 A. I wouldn't presume to know the
11 details about that at this point.

12 Q. Okay.

13 A. What I would say is that, the
14 Orleans Parish School Board, NOLA Public
15 Schools, has a contract and an accountability
16 framework that they have developed that
17 aligns with their goals and their values as
18 an authorizer. The State Department and BESE
19 have their own accountability framework and
20 their own systems for doing things.

21 Q. Okay.

22 A. I would assume that there is
23 significant overlap between those two things,
24 but I would not assume those two things are,
25 you know, one circle.

1 Q. Okay. Got it.

2 A. And so they -- they joined that
3 process, as was their right, to ensure that
4 everything that we -- everything that we said
5 publicly, when we said these 75 students are
6 eligible to graduate, was accurate and done
7 in accordance with state law.

8 Q. Okay. Are you aware of any
9 actions, or lack thereof, by the Department
10 of Education that contributed to or caused
11 the malfeasance that you just mentioned that
12 made the records, student records, unreliable
13 at Kennedy in 2019?

14 A. The only thing that I would say is
15 that the Department of Education has at its
16 disposal the ability to remove teacher
17 certification and teacher licenses. Some of
18 the individuals that were involved in this
19 process had been accused or implicated in
20 similar sets of activities at previous
21 places. If those individuals had had their
22 teacher certifications revoked, or teacher
23 licenses removed, prior, as relates to those
24 previous instances by the Department of
25 Education, it is less likely that they would

1 have been employed in education.

2 Q. Okay. Other than the revocation or
3 removal of licenses and certifications, is
4 there anything else that you're aware of that
5 the Department of Education did or failed to
6 do that led to the problems with these
7 students' records in 2019 at JFK?

8 A. Not to my knowledge, no, nothing
9 else that I'm aware of.

10 Q. Do you have any reason to believe
11 that the Department of Education was aware of
12 what was happening at the school prior to
13 when the board became aware?

14 A. No. No. The Department of
15 Education wasn't involved in any way, shape
16 or form in the process, up until the moment
17 of the -- up until the graduation, the
18 situation that happened as a result of
19 graduation.

20 MS. DUFFOURC:

21 Okay. Those are all the questions
22 I have for you. Thank you very
23 much.

24 MS. BAGNERIS:

25 I have some follow-up.

1 little bit. Because earlier you testified
2 that the one thing you thought of that was an
3 action or inaction by LDOE was that they
4 maybe could have revoked or canceled some
5 licenses or certifications for these
6 educators, and, if that had been done prior
7 to all of this, then those people would
8 not -- it's less likely they would have been
9 at the school and caused -- you know, leading
10 to some of these problems.

11 So my question, then, is just sort
12 of follow-up to that answer that you gave, to
13 say, which educators were you referring to
14 when you gave that information?

15 MS. CRAIG:

16 So then you're speaking of, if
17 something happened before where
18 those certifications might have
19 been revoked, is that -- I mean --

20 MS. DUFFOURC:

21 Yes.

22 EXAMINATION BY MS. DUFFOURC:

23 Q. So to clarify, I'm not talking
24 about right now everything you know, you
25 know, the teachers that you wish their

1 certification would get revoked. I'm asking
2 in the context of your answer that some of
3 these teachers should not have been there in
4 the first place, and potentially that's an
5 action that LDOE failed to take or -- you
6 know, prior to all of this. And I just want
7 to know which particular educators you were
8 referring to?

9 A. Yeah. So I'll say two things. So
10 the two individuals that I know were
11 implicated in previous allegations of
12 cheating or malfeasance were Miss Taisha
13 Payne and Mr. Brian Gibson. They were
14 implicated. There were news stories about
15 them. If you Google them, you can see them.

16 I would go further and just say that
17 any person that is being credibly accused of
18 malfeasance with regard to students or with
19 regard to the public trust broadly, does not
20 deserve to have a place in Louisiana
21 classrooms. And I believe that the
22 Department of Education has the ability and
23 responsibility to take action when they have
24 credible allegations.

25 Q. And I understand that you're saying