

SCHOOL BOARD OF BROWARD COUNTY

**ROBERT W. RUNCIE,
Superintendent of Schools,**

Petitioner,

v.

No Case No.

JOANNA MARIE HERRING,

Respondent.

PETITION FOR ADMINISTRATIVE HEARING

The undersigned, on behalf of JOANNA MARIE HERRING, hereby requests that an administrative hearing be convened to allow Ms. Herring to challenge the recommendation of the Superintendent that she be suspended from her position without pay with the Broward County School Board. In support of this request, the School Board is shown as follows:

- 1. Identification of Respondent:** Joanna Marie Herring
2120 NW 62nd Avenue
Hollywood, FL 33024

- 2. Date when Respondent Was Advised of Recommended Agency Action:** By letter dated July 15, 2019, hand delivered to Ms. Herring on July 17, 2019, and received by counsel on August 5, 2019, with attached Administrative Complaint, the Respondent was notified that the Superintendent will recommend to the School Board that the Respondent be suspended from her position without pay.

- 3. Statement Regarding Substantial Interest:** The Respondent's substantial interests are affected inasmuch as the Respondent will suffer a loss of income.

4. **Statement of Disputed Material Facts:** Respondent denies the factual allegations set forth in paragraphs 6 through 54 of the Administrative Complaint.
5. **Statement of Relevant Facts:** No cause exists for the suspension without pay of the Respondent's employment by the Broward County School Board.
6. **Rules and Statutes Requiring Reversal of the Proposed Disciplinary Action:** There is no just cause to suspend the Respondent without pay from her teaching position pursuant to any relevant Florida Statute, Rule 6A-10.081, F.A.C., relevant School Board Policy, the Respondent's employment contract, School Board Rules and Regulations, the Code of Ethics of the Education Profession, and/or the Employee Disciplinary Guidelines promulgated by the School Board.
7. **Relief sought:** Reimbursement of lost wages.
8. **Statement with file number:** No file number was provided to Respondent at this time.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on August 6, 2019, I forwarded this document, via email transmission to Robert W. Runcie (supt_runcie@browardschools.com), Superintendent of Schools, Kathleen C. Wright Admin Building, 600 SE 3rd Avenue, Ft. Lauderdale, FL, 33301; and to Barbara Myrick, Esquire (barbara_myrick@browardschools.com).



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