

THE BROWARD COUNTY SCHOOL BOARD, FLORIDA

ROBERT W. RUNCIE,
Superintendent of Schools,

Petitioner,

v.

VENORRICE ANTONIO WELLS,

Respondent.

_____ /

ADMINISTRATIVE COMPLAINT

Petitioner, Robert W. Runcie, Superintendent of Schools of Broward County, Florida ("Petitioner"), through his undersigned counsel, files this Administrative Complaint against Respondent, Venorrice Antonio Wells ("Wells"). The Petitioner seeks termination of Respondent's employment with the Broward County School Board ("BCSB"). The Petitioner alleges the following:

I. JURISDICTIONAL BASIS

1. The agency is the School Board of Broward County, Florida, located at 600 Southeast Third Avenue, Fort Lauderdale, Broward County, Florida 33301.
2. The Petitioner is Robert W. Runcie, who is the Superintendent of Schools of Broward County, Florida.
3. The Petitioner is statutorily obligated to recommend the placement of school personnel and to require compliance and

observance with all laws, rules, and regulations. Petitioner is authorized to report and enforce any violation thereof, together with recommending the appropriate disciplinary action against any instructional personnel employed by the BCSB, inclusive of Wells.

4. Wells is an employee of the BCSB and is currently employed as a teacher pursuant to an Annual Contract, issued in accordance with Section 1012.335, Florida Statutes (2019).
5. The last known address of Wells is 4651 NW 79th Avenue, Lauderhill, Florida, 33351.

II. MATERIAL ALLEGATIONS

6. This recommendation is based upon conduct occurring between the 2018/2019 and 2019/2020 school years, more specifically on or about July 11, 2019.
7. Wells is employed as a science teacher at Dillard High School 6-12 ("Dillard").
8. The BCSB hired Wells on or about December 16, 2011 pursuant to an Annual Services Contract.

Criminal Case of State of Florida v. Venorrice Antonio Wells, Case Number 19009036CF10A.

9. Wells, is currently charged with two (2) counts of Unlawful Sexual Activity With Certain Minors.
10. Count 1:

A. It is alleged through a criminal Information that on or about July 11, 2019, in Broward County, Florida, Wells committed the crime of Unlawful Sexual Activity With Certain Minors, to wit: being a person 24 years of age or older, did engage in sexual activity with Victim, a person 16 or 17 years of age, by causing his finger to penetrate the vagina of Victim, contrary to Florida Statute 794.05(1). Please see Exhibit "A."

11. Count 2:

A. It is alleged through a criminal Information that on or about July 11, 2019, in Broward County, Florida, Wells committed the crime of Unlawful Sexual Activity With Certain Minors, to wit: being a person 24 years of age or older, did engage in sexual activity with Victim, a person 16 or 17 years of age, by causing his mouth and/or tongue to penetrate or unite with the sexual organ of Victim, contrary to Florida Statute 794.05(1). Please see Exhibit "A."

12. On or about July 11, 2019, the Victim stated she asked Wells who was 31-years old for a ride home from the Boys and Girls Club where both worked, and he agreed. On the ride home, Wells parked his vehicle in a discreet location and placed his hand on Victim's thigh. The Victim unbuttoned her pants

and Wells digitally penetrated her vagina. Wells then proceeded to perform oral sex on the Victim. The Victim then grabbed Wells' penis and masturbated it until he ejaculated. Wells then drove the Victim home.

13. On or about July 19, 2019, Wells was booked into the Broward County Jail where bond was set at \$25,000.00 for Count 1 (Unlawful Sexual Activity With Certain Minors) and Count 2 (Unlawful Sexual Activity With Certain Minors). Please see Exhibit "B."
14. On or about July 20, 2019, Broward County Judge Murphy ordered a Pretrial Services Supervision Order which mandated Wells was placed onto Level II Global Positioning Services ("GPS") Electronic Monitoring where Wells was confined to his residence twenty-four (24) hours per day. Wells was also ordered to have no contact with Victim. Please see Exhibit "C."
15. As may be seen below, Wells has told many different stories of what occurred on July 11, 2019.
16. On or about July 19, 2019, Wells self-reported the circumstances of his arrest. In his self-report, Wells stated the Victim grabbed his arm and rubbed it against her. Wells contends he then told the Victim, "no this is not that type

of party and I can't get down like this meaning I don't want to do this." Please see Exhibit "D."

17. On or about July 23, 2019, Broward County School Board's Special Investigative Unit ("SIU") hand-delivered a letter to Wells formally advising him of their investigation into his arrest. The letter also contained enclosures of the Broward County School Board Policy 4.9 and The Principles of Professional Conduct for The Education Profession in Florida. Please see Exhibit "E."
18. On or about July 23, 2019, through hand-delivered correspondence from SIU, Wells was placed on administrative reassignment, with pay, pending the outcome of his SIU investigation. Please see Exhibit "F."
19. On or about October 15, 2019, Wells was given correspondence of the SIU investigation into his inappropriate conduct through a Notice to Appear for Compelled Statement. Please see Exhibit "G."
20. On or about October 24, 2019, Wells was interviewed by Detective Frank Canellas of Broward County School Board's Special Investigative Unit. Wells was read his public employee *Garrity* warning while in the presence of his attorney, Mr. Johnny McCray. Please see Exhibit "H."

21. Wells stated he knew the Victim from working at the Boys and Girls Club and the Victim was not a student at Dillard. The Victim is a student at Boyd Anderson High School.
22. Wells stated that on July 11, 2019, he agreed to take the Victim home after work. Wells stated that notwithstanding one stop at a friend's house, he took the Victim straight home from work and there was no sexual encounter.
23. Wells further stated there was no sexual conversation or sexual conduct during the drive home.
24. This concluded questioning from Detective Canellas.
25. Upon conclusion of Detective Canellas' questioning, Wells' attorney asked him questions about the incident. Wells changed his story and stated he had told the Broward County Sheriff's Office ("BSO") that he did have sexual contact with the Victim on July 11, 2019.
26. Wells stated he told BSO he had sex with the Victim to avoid being charged with rape. Wells stated he made the statements to BSO under duress.
27. On or about January 22, 2020, the Professional Standards Committee met on Wells' case and determined sufficient factual or legal basis existed to establish just cause for inappropriate conduct, to recommend the disciplinary action of termination. Please see Exhibit "I."

28. On or about March 12, 2020, Wells and his representative attended his pre-disciplinary conference with SIU at which time his representative stated Wells would fight the recommended discipline. Please see Exhibit "J."

III. ADMINISTRATIVE CHARGES

29. Petitioner realleges and incorporates herein by reference the allegations set forth in paragraphs one through twenty-eight (28), above.

30. Just cause exists for the requested relief pursuant to Section 1012.335, Fla. Stat., Section 435.04, Fla. Stat., Section 6A-5.056, F.A.C., the Respondent's employment contract, BCSB rules and regulations, the Code of Ethics of the Education Profession, and the policies promulgated by the BCSB.

31. "Just cause" means cause that is legally sufficient. Pursuant to Section 6A-5.056 F.A.C., "just cause" includes, **but is not limited to:**

A. "Immorality" means conduct that is inconsistent with the standards of public conscience and good morals. It is conduct that brings the individual concerned or the education profession into public disgrace or disrespect and impairs the individual's service in the community.

B. "Misconduct in Office" means one or more of the following:

1. A violation of the Code of Ethics of the Education Profession in Florida as adopted in Rule 6A-10.080, F.A.C.¹;
2. **A violation of the Principles of Professional Conduct for the Education Profession in Florida as adopted in Rule 6A-10.081, F.A.C.;**
3. A violation of the adopted school board rules;
4. Behavior that disrupts the student's learning environment; or
5. Behavior that reduces the teacher's ability or his or his colleagues' ability to effectively perform duties.

C. "Incompetency" means the inability, failure or lack of fitness to discharge the required duty as a result of inefficiency or incapacity.

1. "Inefficiency" means one or more of the following:
 - a. Failure to perform duties prescribed by law;
 - b. **Failure to communicate appropriately with and relate to students;**
 - c. Failure to communicate appropriately with and relate to colleagues, administrators, subordinates, or parents;
 - d. Disorganization of his or his classroom to such an extent that the health, safety or welfare of the students is diminished; or
 - e. Excessive absences or tardiness.

* * *

(emphasis added).

¹ Repealed 3-23-16. Now included in 6A-10.081 F.A.C., Principles of Professional Conduct for the Education Profession in Florida.

IV. JUST CAUSE FOR DISCIPLINE

A. JUST CAUSE

32. Respondent's actions constitute just cause to terminate his employment with the BCSB.

B. IMMORALITY

33. Respondent's actions constitute acts of immorality.

C. MISCONDUCT IN OFFICE

34. Respondent's actions constitute misconduct in office. The Respondent through his above-described conduct, has violated Fla. Stat. §1012.335 Fla. Stat., and one or more of Rules 6A-5.056(2)(a) through (e) of the Florida Administrative Code, which defines "misconduct".

RULE 6A-10.081 F.A.C., PRINCIPLES OF PROFESSIONAL CONDUCT FOR THE EDUCATION PROFESSION IN FLORIDA

35. Wells has violated the following Principles of Professional Conduct for the Education Profession in Florida,

(2) Florida educators **shall**² comply with the following disciplinary principles. Violation of any of these principles shall subject the individual to revocation or suspension of the individual educator's certificate, or the other penalties as provided by law.

(a) Obligation to the student requires that the individual:

1. Shall make reasonable effort to protect the student from conditions harmful to learning

² Emphasis added.

and/or to the student's mental and/or physical health and/or safety.

* * *

5. Shall not intentionally expose a student to unnecessary embarrassment or disparagement.

* * *

E. INCOMPETENCY

36. Respondent's actions constitute incompetency. The Respondent, through his above-described conduct has violated Florida Statute §1012.33 and Rule 6A-5.056(3)(a) of the Florida Administrative Code. His actions show a failure to perform the required duties as a result of inefficiency, as follows:

(a) "Inefficiency" means one or more of the following:

* * *

2. Failure to communicate appropriately with and relate to students;

F. SCHOOL BOARD POLICY 4008

37. Wells is in violation of School Board Policy 4008 titled, "Responsibilities and Duties (Principals and Instructional Personnel)," which requires all employees who have been issued contracts to comply with the provisions of the Florida School Code, State Board Regulations and regulations and policies of the Board.

38. Furthermore, School Board Policy 4008(B) requires that "members of instructional staff shall perform the following functions:"

1. Comply with the Code of Ethics and the Principles of Professional Conduct of the Education Profession in Florida.

* * *

3. Infuse in the classroom, the District's adopted Character Education Traits of Respect, Honesty, Kindness, Self-control, Tolerance, Cooperation, Responsibility and Citizenship.
4. Enforce the Broward County Schools Code of Conduct.

* * *

8. Conform to all rules and regulations that may be prescribed by the State Board and by the School Board.

* * *

G. SCHOOL BOARD POLICY 4.9

39. Pursuant to School Board Policy 4.9, "[e]mployees are expected to comply with workplace policies, procedures and regulations, local, state and federal laws; and State Board Rules, both in and out of the work place."

40. Wells is also in violation of various Section II, Category B Offenses which prohibit the following:

* * *

- m) Any violation of The Code of Ethics of the Education Professional in the State of Florida-State Board of Education Administrative Rule.

* * *

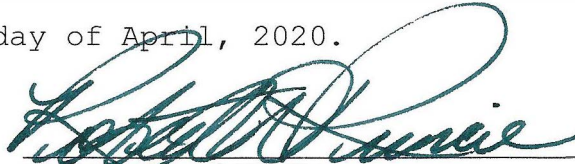
- r) Failure to comply with School Board policy, state law, or appropriate contractual agreements.

* * *

DEMAND FOR RELIEF

WHEREFORE, based upon the foregoing, Petitioner, Robert W. Runcie, Superintendent of Schools, recommends that the BCSB terminate the Respondent, Venorrice Antonio Wells, based upon the foregoing facts and legal authority.

EXECUTED this 24th day of April, 2020.



ROBERT W. RUNCIE,
Superintendent of Schools,
Broward County, Florida

Respectfully submitted:
Andrew Brett Carrabis, Esq.
Administrative Counsel

NOTICE

If you wish to contest the charges, you must, within 15 calendar days after receipt of the written notice, submit a written request for a hearing to Robert W. Runcie, Superintendent, Broward County School District, 600 3rd Ave., Ft. Lauderdale, FL, 33301. If timely requested, such hearing shall be conducted by an administrative law judge assigned by the Division of Administrative Hearings of the Department of Management Services. The hearing shall be conducted within 60 days after receipt of the written appeal in accordance with chapter 120, Florida Statutes.

FAILURE TO TIMELY REQUEST A HEARING WILL RESULT IN A WAIVER OF THE RIGHT TO CONTEST THE CHARGES.

IF YOU WANT TO HIRE AN ATTORNEY, YOU HAVE THE RIGHT TO BE REPRESENTED BY AN ATTORNEY IN THIS MATTER.

EXHIBIT "A"

Filing # 93802592 E-Filed 08/07/2019 01:37:06 PM

**IN THE CIRCUIT COURT OF THE SEVENTEENTH JUDICIAL CIRCUIT
IN AND FOR BROWARD COUNTY, STATE OF FLORIDA**

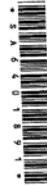
THE STATE OF FLORIDA

INFORMATION FOR

vs.

**I. – II. UNLAWFUL SEXUAL ACTIVITY
WITH CERTAIN MINORS**

VENORRICE ANTONIO WELLS



IN THE NAME AND BY THE AUTHORITY OF THE STATE OF FLORIDA:

MICHAEL J. SATZ, State Attorney of the Seventeenth Judicial Circuit of Florida, as Prosecuting Attorney for the State of Florida in the County of Broward, by and through his undersigned Assistant State Attorney, charges that **VENORRICE ANTONIO WELLS**

on or about the 11th day of July, 2019, in the County and State aforesaid, being a person 24 years of age or older, did engage in sexual activity with ■■■, a person 16 or 17 years of age, by causing his finger to penetrate the vagina of ■■■ contrary to F.S. 794.05(1). (L6)

COUNT II

MICHAEL J. SATZ, State Attorney of the Seventeenth Judicial Circuit of Florida, as Prosecuting Attorney for the State of Florida in the County of Broward, by and through his undersigned Assistant State Attorney, charges that **VENORRICE ANTONIO WELLS**

on or about the 11th day of July, 2019, in the County and State aforesaid, being a person 24 years of age or older, did engage in sexual activity with ■■■, a person 16 or 17 years of age, by causing his mouth and/or tongue to penetrate or unite with the sexual organ of ■■■. contrary to F.S. 794.05(1). (L6)

*** FILED: BROWARD COUNTY, FL BRENDA D. FORMAN, CLERK 08/09/2019 08:22:13 AM.***

STATE OF FLORIDA vs. VENORRICE ANTONIO WELLS
INFORMATION, Page 2

IDENTIFYING DATA:

Black, Male, Height 5' 8", 180 Lbs, Brown Eyes, Black Hair
DOB: 10-11-1987; Place of Birth: **Fort Lauderdale**

COUNTY OF BROWARD
STATE OF FLORIDA

Personally appeared before me **CHRISTINE ADLER**, duly appointed as an Assistant State Attorney of the 17th Judicial Circuit of Florida, by **MICHAEL J. SATZ**, State Attorney of said Circuit and Prosecuting Attorney for the State of Florida in the County of Broward, who being first duly sworn, certifies and says that testimony has been received under oath from the material witness or witnesses for the offense(s), and the allegations as set forth in the foregoing Information would constitute the offense(s) charged, and that this prosecution is instituted in good faith.



ASSISTANT STATE ATTORNEY, 17TH JUDICIAL CIRCUIT OF FLORIDA

SWORN TO AND SUBSCRIBED before me this 6th day of August, A.D. 2019.

BRENDA FORMAN

Clerk of the Circuit Court, 17th Judicial Circuit,
Broward County, Florida

By: _____

Deputy Clerk



To the within Information, Defendant pleaded _____

BRENDA FORMAN

Clerk of the Circuit Court, 17th Judicial Circuit,
Broward County, Florida

By: _____

Deputy Clerk

CA:gm 8-1-2019-2

EXHIBIT "B"

Filing # 93802592 E-Filed 08/07/2019 01:37:06 PM ^{19 08 07 01:37:06 PM}



Broward County Sheriff's Office

Fein

Booking Report

Dowers



Adler
2454394

8-8-19

CIS #	501902708	BCCN #	914985	Booking Sheet Control Date and Time	07/19/19 21:47:34
OBTS	607260412	Print Clearance	07/19/19 20:36:13	Prints	Yes
Arrest #	BS 1902708	Offense Report #	901907006361	Agency	BROWARD SHERIFF'S OFFICE

Last Name	WELLS, VENORRICE ANTOINO					SSN #	****
First							
Middle							

Race	Sex	Height	Weight	Eyes	Hair	Comp.	Age Admitted	DOB	Place of Birth	State	FDLE
B	M	508	180	BRO	BLK	MBR	31	10/11/1987	FT. LAUDERDALE	FLORIDA	7899447

Permanent Address	4651 NW 79TH AVE LAUDERHILL FL 33351	Months of Residence	372
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Arrest Date	07/19/19 13:59:00	Place of Arrest	2621 SW 15TH ST	Arresting Officer	16660 SCHNAKENBERG
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Inmate Logged Date	07/19/19 20:18:08	Inmate Log Type	FULL INTAKE	Place Admitted	MAIN
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Intake Comments SP/CO- 16950 29/54- 16950 WC- 18912

Alias Last name, First, Middle, DOB

Warrants Officer Id: bs18912

Scars, Marks, Tattoos

Tattoos	Arm, upper right	A PICTURE OF JESUS, W	<i>State Attorney's Copy</i> <i>NK</i>
Tattoos	Forearm, right	LULA B	
Tattoos	Arm, upper left	CROSS, V	
Tattoos	Forearm, left	FOOTBALL, WELLS	

7/2/19

Release Date/Time	Release Reason	Release Authorized By
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Charge No.	Charge Initiation Date	Statute	Warrant/Capias	Level	M.C	B. Type	Bond Amount
1	07/19/19 21:28	794.05-1		2F	Y	HOLD FOR MAG	\$0.00
Charges	SEX ASLT BY 24 YOA+ SEX BAT VICT 16 OR 17 YOA			Comments	<i>25,000</i>		
Booking Off. ID	bs06972	County	Judge				

Charge No.	Charge Initiation Date	Statute	Warrant/Capias	Level	M.C	B. Type	Bond Amount
2	07/19/19 21:28	794.05-1		2F	Y	HOLD FOR MAG	\$0.00
Charges	SEX ASLT BY 24 YOA+ SEX BAT VICT 16 OR 17 YOA			Comments	<i>25,000</i>		
Booking Off. ID	bs06972	County	Judge				

Charge No.	Charge Initiation Date	Statute	Warrant/Capias	Level	M.C	B. Type	Bond Amount
3	07/19/19 21:30	800.101-3(1)		2F	Y	HOLD FOR MAG	\$0.00
Charges	AUTHORITY FIGURE SOLICIT/ENGAGE IN SEXUAL CONDUCT WITH STUDENT			Comments	<i>10,000</i>		
Booking Off. ID	bs06972	County	Judge				

* End of Report *

- NVC
- PTR w/ 2 w/ops

*** FILED: BROWARD COUNTY, FL BRENDA D. FORMAN, CLERK 08/09/2019 08:22:13 AM.***

COMPLAINT AFFIDAVIT
SHADED FIELDS MUST BE ANSWERED IF DEFENDANT NOT IN CUSTODY

ARREST FORM

BROWARD COUNTY
ARREST #

OBTS #

Filing Agency BROWARD COUNTY SO	Offense Report 90-1907-006361	Local ID #	FDLE	FBI	SS #
Defendant's Last Name WELLS	First Middle SUF VENORRICE ANTONIO	Alias/Street Name	Citizenship		
Race B	Sex M	Hgt 5'07	Wgt	Hair	Eyes
Age 31	DOB 10/11/1987	Birth Place			Scars, Marks, TT
Permanent Address 1709 NW 14TH ST, FT LAUDERDALE, FL 33311					Place of Employment DILLARD HS, 2501 NW 11TH CT
Residence Type: (1) City (2) County (3) Florida (4) Out of State	Local Address: 1709 NW 14TH ST, FT LAUDERDALE, FL 33311			Length	
How long defendant in Broward County	Breathalyzer By/CCN	Reading	Place of Arrest 2621 SW 15TH ST	Date/Time Arrested 07/19/2019 13:59	Arresting Officer(s) CCN SCHNAKENBERG, RYAN (16660)
Officer Injured: Y <input type="checkbox"/> N <input checked="" type="checkbox"/>	Unit SPVT	Zone 2382	Beat	Shift	Trans. Unit
PMD: Y <input type="checkbox"/> N <input checked="" type="checkbox"/>	Transporting Officer/CCN		Pick-up Time	Time Arrived/BSO	
TYPE/ACTIVITY:	Type: N-N/A A-Amphetamine B-Barbiturate C-Cocaine	S-Heroin H-Hallucinogen M-Marijuana O-Opium/deriv.	P-Paraphernalia/Equipment S-Synthetic U-Unknown Z-Other	Activity: N-N/A P-Possess S-Sell B-Buy	T-Traffic A-Smuggle D-Deliver E-Use
	M-Manufacture/Produce/Cultivate K-Dispense/Distribute Z-Other		Indication of: Alcohol Influence <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Drug Influence <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>		

Attach Defendant's Photo

Defendant's Vehicle Make: _____ Type: _____ Year: _____ Color: _____ VIN # _____
 Vehicle Towed To: _____ Tag # _____ Other Identifiers or Remarks: _____

Name of victim(s) (if corporation, exact legal name and state of incorporation):

Count #	Offenses Charged	WC# / Citation # (if applicable)	FS or Capias/Warrant #
1	SEX ASSLT-BY 24 YOA OLDER SEX BATT VICTIM 16 OR 17 YOA		794.05
1	SEX ASSLT-BY 24 YOA OLDER SEX BATT VICTIM 16 OR 17 YOA		794.05
1	AUTHORITY FIGURE SOLICIT/ENGAGE IN SEXUAL CONDUCT WITH STUDT		800.101-3(1)

Probable Cause/Affidavit

Before me this date personally appeared SCHNAKENBERG, RYAN (16660) who being first duly sworn deposes and says that on 11 day of July (year) 2019 at 4150 NW 34TH ST, LAUDERDALE LAKES, FL 33027 (crime location) the above named defendant committed the above offenses charged and the facts showing probable cause to believe the same are as follows:
 On 07/11/19, while in the parking lot of 4150 NW 34th St, (Lauderdale Lakes), the defedant committed sexual assault on the victim, to wit:

At approximately 1730 hours, the defendant (31 yoa) was driving the victim (16 yoa) home from the Boys and Girls Club. While driving, the defendant began to digitally penetrate the victim's vagina. The defendant then pulled into the parking lot of the incident
 * * * Continued * * *

Under penalties of perjury, I declare that I have read the foregoing and that the facts stated therein are true and correct to the best of my knowledge and belief.
 _____ SCHNAKENBERG, RYAN (16660) Investigative Services
 Officer's Name/CCN Officer's Division

STATE OF FLORIDA
 COUNTY OF BROWARD
 Sworn to (or affirmed) and subscribed before me this 19 day of July 2019 (year),
 by SCHNAKENBERG, RYAN (name and title), who is personally known to me or has produced _____ as identification.

Notary Public, Deputy Clerk of the Court, or Assistant State Attorney

 Title/Rank and CCN

 Print, Type or Stamp Commissioned Name of Notary Public (SEAL)

Seventeenth Judicial Circuit
 Broward County
 State of Florida
 BSO DB #2 (Revised 05/00)
 FIRST APPEARANCE/ARREST FORM
 (SHOULD ADDITIONAL SPACE BE NEEDED, USE THE PROBABLE CAUSE AFFIDAVIT CONTINUATION (BSO DB#2a))
 Orig - Court
 2nd - State Attorney
 3rd - Filing Agency
 4th - Arresting Agency

COURT COPY

SP100 16950 29/54 16950 W/C 18912

COMPLAINT AFFIDAVIT
PROBABLE CAUSE AFFIDAVIT CONTINUATION

ARREST FORM

BROWARD COUNTY
ARREST #

OBTS #

Filing Agency BROWARD COUNTY SO	Offense Report 90-1907-006361	Local ID #	FDLE	FBI	SS #
Defendant's Last Name WELLS	First VENORRICE ANTONIO	Middle	SUF	Alias/Street Name	Citizenship
Name of victim(s) (if corporation, exact legal name and state of incorporation):					
Count #	Offenses Charged	WC# / Citation # (if applicable)		FS or Capias/Warrant #	
	*** SEE PAGE 1 ***				

Probable Cause Affidavit


Before me this date personally appeared SCHNAKENBERG, RYAN (16660) who being first duly sworn deposes and says that on 19 day of July, (year) 2019 at 4150 NW 34TH ST, LAUDERDALE LAKES, FL 33324 (crime location) the above named defendant committed the above offenses charged and the facts showing probable cause to believe the same are as follows:
 location. While in the parking lot, the defendant and victim sat in the backseat of the vehicle, and the suspect performed oral sex on the victim. After the defendant finished performing oral sex, the victim masturbated the defendant's penis causing him to ejaculate. The victim advised the sexual acts were consensual. The victim told a friend what occurred, and the friend reported the incident. Both the victim and defendant work at the Boys and Girls club. An according to SIU, the defendant is employed by the Broward County School Board as a middle school science teacher. SIU also advised there was a prior report of sexual misconduct filed against the defendant in the 2013-2014 school year, however the allegation was unfounded.

On 07/18/19 at approximately 1500 hours, I made contact with the victim's mother and then the victim. I obtained a recorded sworn statement from the victim. During the statement, the victim advised she asked the defendant for a ride home. The victim advised while inside the vehicle, the defendant placed his hand on her thigh. The victim advised she unbuttoned her pants and the defendant began to digitally penetrate her vagina. The victim advised the defendant pulled into the parking lot of an apartment complex and parked the vehicle. The victim advised she and the defendant went to the third row of his vehicle, at which point the defendant began to perform oral sex on her. The victim advised after he finished performing oral sex, she grabbed the defendant's penis and masturbated it until he ejaculated. The victim advised the defendant then drove her home. The victim advised the defendant drives a black Tahoe.

At approximately 2117 hours, a recorded controlled phone call was made with the defendant. During the controlled call, the victim asked the defendant if he was picking her up tomorrow, he stated yes. The victim asked the defendant to come over earlier he

*** Continued ***

I swear the above statement is correct and true to the best of my knowledge and belief.



Officer/Affiant's Signature

SCHNAKENBERG, RYAN (16660)

Officer's Name/CCN

Investigative Services

Officer's Division

STATE OF FLORIDA
COUNTY OF BROWARD


Sworn to (or affirmed) and subscribed before me this 19 day of July, 2019 (year), by SCHNAKENBERG, RYAN (name and title), who is personally known to me or has produced _____ as identification.



Notary Public, Deputy Clerk of the Court, or Assistant State Attorney

DET. KSH

Title/Rank and CCN



Print, Type or Stamp Commissioned Name of Notary Public

(SEAL)

Seventeenth Judicial Circuit
Broward County
State of Florida
BSO DB-#2a (Revised 05/00)

FIRST APPEARANCE/ARREST FORM

COURT COPY

- Orig - Court
- 2nd - State Attorney
- 3rd - Filing Agency
- 4th - Arresting Agency

COMPLAINT AFFIDAVIT
PROBABLE CAUSE AFFIDAVIT CONTINUATION

ARREST FORM

BROWARD COUNTY

ARREST #

OBTS #

Filing Agency BROWARD COUNTY SO	Offense Report 90-1907-006361	Local ID #	FDLE	FBI	SS #
Defendant's Last Name WELLS	First VENORRICE ANTONIO	Middle	SUF	Alias/Street Name	Citizenship
Name of victim(s) (if corporation, exact legal name and state of incorporation):					
Count #	Offenses Charged	WC# / Citation # (if applicable)		FS or Capias/Warrant #	
	*** SEE PAGE 1 ***				

Probable Cause Affidavit

Before me this date personally appeared SCHNAKENBERG, RYAN (16660) who being first duly sworn deposes and says that on 19 day of July (year) 2019 at 4150 NW 34TH ST, LAUDERDALE LAKES, FL 33324 (crime location) the above named defendant committed the above offenses charged and the facts showing probable cause to believe the same are as follows:

advised he would try, the victim asked him if he knew why she wanted him there early, he advised "ok, ok, I get what you're saying, alright", the victim then asked the defendant if he knew what she was saying, he said "I know what you are saying". The victim asked the defendant to say what he thought she meant, he advised "are you crazy?, I'll see you tomorrow". The defendant then hung up the phone. At approximately 2134 hours, after speaking to the defendant, the victim sent him a text that stated " I was tryna tell you, that you could in if you wanted we don't have to be in the back seat anymore". The victim also texted him "my mom leaves at 730". The victim's residence has cameras. A review of the cameras shows that on 07/11/19 (date of incident), the victim was dropped off by a black SUV at approximately 1759 hours. The victim exists the vehicle from the backseat. The same vehicle is seen picking the victim up in the morning on Tuesday, Wednesday, and Thursday of this week.

On 07/19/19 at approximately 0758 hours, a recorded controlled call was made to the defendant. During the controlled call, the victim told the defendant that she no longer needed a ride. The victim asked the defendant, why he did not respond to her txt, he advised "I be with my people, sometimes it be hard because she be right there". The victim asked the defendant to come by real quick after work, the defendant stated your mom or someone would be home and she stated no. The defendant advised he would call her later, the victim stated to the defendant "if you do come over, can you make sure to bring protection", the defendant stated "oh ok".

Video surveillance was obtained from the apartment complex. On the date of the incident, at approximately 1630 hours, the defendant's vehicle is seen pulling into the parking lot.

*** Continued ***

I swear the above statement is correct and true to the best of my knowledge and belief.

[Signature]
Officer/Affiant's Signature

SCHNAKENBERG, RYAN (16660)
Officer's Name/CCN

Investigative Services
Officer's Division

STATE OF FLORIDA
COUNTY OF BROWARD

Sworn to (or affirmed) and subscribed before me this 19 day of July, 2019 (year), by SCHNAKENBERG, RYAN (name and title), who is personally known to me or has produced

[Signature] as identification.
13121
Notary Public, Deputy Clerk of the Court, or Assistant State Attorney

DET 15721
Title/Rank and CCN

D. BROADHURST
Print, Type or Stamp Commissioned Name of Notary Public

(SEAL)

Seventeenth Judicial Circuit
Broward County
State of Florida

FIRST APPEARANCE/ARREST FORM

COURT COPY

BSO DB-#2a (Revised 05/00)

- Orig - Court
- 2nd - State Attorney
- 3rd - Filing Agency
- 4th - Arresting Agency

COMPLAINT AFFIDAVIT
PROBABLE CAUSE AFFIDAVIT CONTINUATION

ARREST FORM

BROWARD COUNTY
ARREST #

OBTS #

Filing Agency BROWARD COUNTY SO	Offense Report 90-1907-006361	Local ID #	FDLE	FBI	SS #
Defendant's Last Name WELLS	First VENORRICE ANTONIO	Middle SUF	Alias/Street Name		Citizenship
Name of victim(s) (if corporation, exact legal name and state of incorporation):					
Count #	Offenses Charged	WC# / Citation # (if applicable)		FS or Capias/Warrant #	
	*** SEE PAGE 1 ***				

Probable Cause Affidavit

Before me this date personally appeared SCHNAKENBERG, RYAN (16660) who being first duly sworn deposes and says that on 19 day of July, (year) 2019 at 4150 NW 34TH ST, LAUDERDALE LAKES, FL 33324 (crime location) the above named defendant committed the above offenses charged and the facts showing probable cause to believe the same are as follows:

At approximately 1130 hours, a recorded controlled call was attempted, however he did not answer.

At approximately 1600 hours, contact was made with the defendant at the Boys and Girls Club. The defendant was transported to the district 5 office to be interviewed. Post Miranda, the defendant stated the victim told him she was 19 years of age. The defendant advised while they were in the backseat of his vehicle, the victim took his hand and placed it inside her pants and used it to touch her vagina. The defendant stated the victim then touched his penis over the clothes. The defendant advised that he was already "horny" and he did not want to ejaculate too soon. The defendant advised he only digitally penetrated the victim.

The defendant was charged with two counts of Unlawful Sexual Activity with Certain Minors (FSS 794.05) and one count Offenses Against Students by Authority Figures (FSS 800.101).

The defendant was transported to the Main Jail.

I swear the above statement is correct and true to the best of my knowledge and belief.

[Signature] SCHNAKENBERG, RYAN (16660) Investigative Services
Officer/Affiant's Signature Officer's Name/CCN Officer's Division

STATE OF FLORIDA
COUNTY OF BROWARD

Sworn to (or affirmed) and subscribed before me this 19 day of July, 2019 (year), by SCHNAKENBERG, RYAN (name and title), who is personally known to me or has produced _____ as identification.

[Signature] DET 1524
Notary Public, Deputy Clerk of the Court, or Assistant State Attorney Title/Rank and CCN

[Stamp] (SEAL)
Print, Type or Stamp Commissioned Name of Notary Public

Seventeenth Judicial Circuit
Broward County
State of Florida

FIRST APPEARANCE/ARREST FORM

Orig - Court
2nd - State Attorney
3rd - Filing Agency
4th - Arresting Agency

BSO DB-#2a (Revised 05/00)

COURT COPY

EXHIBIT "C"

**** FILED: BROWARD COUNTY, FL Brenda D. Forman, CLERK 7/22/2019 2:39:52 PM.****

STATE OF FLORIDA
VS.

Wells, Venoreice
NO MONETARY BOND REQUIRED
BOND(S) SET AT 25,000 each¹⁻²
10,000³



IN THE CIRCUIT/COUNTY COURT OF THE
SEVENTEENTH JUDICIAL CIRCUIT IN AND
FOR BROWARD COUNTY, FLORIDA

ARREST NO. 501902708
CASE NO. 19009036C70A
CHARGES: Sex Aslt by 24 YOA + SA
Staff Vic. Near 17
Authority Figure Solicit/Engage
in Sexual Conduct with Student

**PRETRIAL SERVICES
SUPERVISION ORDER**

FILED IN OPEN COURT
CLERK OF THE CIRCUIT COURT
ON JUL 22 2019
BY [Signature]

IT IS HEREBY ORDERED AND ADJUDGED THAT,

- The defendant shall be released forthwith upon receipt of bond from custody and shall report to the Broward Sheriff's Office Division of Pretrial Services for enrollment and instruction as to release conditions. Electronic Monitoring defendants shall be released only in person to Pretrial Services staff during prescribed hours.
- The defendant shall not leave Broward, Miami-Dade, or Palm Beach County, Florida, or the County of their residence and/or change their residence or phone number without obtaining permission from the Court or the assigned Pretrial Services staff. The defendant shall abide by all rules and regulations as set forth by the Pretrial Services Division
- The defendant shall not violate any City, County, State, or Federal laws.
- The defendant shall attend all Court hearings. The defendant shall report to the Pretrial Services Office immediately after Court for the purpose of submitting required Court documents.
- The defendant shall follow all valid instructions as set forth by the Court or Pretrial Services and shall submit to one of the following:
 - The defendant shall be placed on **STANDARD PRETRIAL SUPERVISION** and shall be required to report _____ times per week by telephone and _____ time(s) per week in person to the designated Pretrial Services Office. The defendant shall be required to secure lawful employment, if able, or enroll in a job skills or education program within thirty (30) calendar days from release. Defendants shall abide by all rules and regulations set forth by the program. Referrals to outside community-based programs may be initiated upon determination by Pretrial Services staff.
 - The defendant shall be placed on **LEVEL (1) with ELECTRONIC MONITORING** at a rate of \$5.00 per day (unless indigent) and shall remain confined to their approved residence twenty-four (24) hours per day. The only exception shall be for medical emergencies. Pre-approval is needed for medical appointments, meetings with assigned attorneys or Pretrial Services staff, Court hearings or Court ordered programs.
ELECTRONIC MONITORING SHALL BE ENFORCED VIA: RF _____, GPS ACTIVE (EXCLUSION ZONES) _____, GPS PASSIVE _____
 - The defendant shall be placed on **LEVEL (2) with ELECTRONIC MONITORING** at a rate of \$5.00 per day (unless indigent) and shall be confined to their approved residence twenty-four (24) hours per day unless approved by Pretrial Services staff. The only exception shall be for medical emergencies. Pre-approval is needed for medical appointments, lawful employment or maximum twenty (20) hours per week for job search, educational purposes, meeting with attorneys or Pretrial Services staff, Court hearings or Court ordered programs. Defendants may also receive a combined total of up to eight (8) hours (including travel time) per week to attend religious services, for personal shopping, and laundry services (if needed).
ELECTRONIC MONITORING SHALL BE ENFORCED VIA: RF _____, GPS ACTIVE (EXCLUSION ZONES) _____, GPS PASSIVE _____
 - The defendant shall be placed on **ELECTRONIC MONITORING** without schedule restrictions at a rate of \$5.00 per day (unless indigent).
ELECTRONIC MONITORING SHALL BE ENFORCED VIA: RF _____, GPS ACTIVE (EXCLUSION ZONES) _____, GPS PASSIVE _____
- The defendant shall submit to the following special conditions:
 - The defendant shall submit to a _____ evaluation within _____ calendar days from release and submit to any recommended follow-up treatment.
 - The defendant shall not consume alcohol or illegal drugs/intoxicants and shall submit to random Drug and Alcohol tests _____ times per _____ (frequency) as ordered by the Court and shall be required to pay for such tests.
 - The defendant shall submit to remote alcohol testing via SOBRIETOR / TAD (landline phone required) at the rate of \$5 00 per day (unless indigent).
 - The defendant shall not own or possess any firearms, weapons or ammunition.
 - The defendant shall not pay Electronic Monitoring fees.
 - The defendant shall have no contact with victim(s) [Redacted] Name(s)
 - The defendant shall further abide by the following: _____

Any violation of this Order, upon affidavit of the Broward Sheriff's Office Division of Pretrial Services attesting thereto, may result in the issuance of an arrest warrant and revocation of release or an Administrative Meeting

DONE AND ORDERED, Fort Lauderdale, Broward County, FL this 20 day of July, 2019

White - Clerk Yellow - Confinement Status Pink - Pretrial Blue - Defendant

BSO DJ#155a (Revised 09/14)

[Signature]
Circuit/County Court Judge

EXHIBIT "D"

THE SCHOOL BOARD OF BROWARD COUNTY, FLORIDA
SPECIAL INVESTIGATIVE UNIT
SECURITY CLEARANCE OFFICE

Tel. (754) 321-2374 Fax (754) 321-2376

Self-Reporting

School Board Policy 2405 requires the self-reporting of arrests AND final judgment of a criminal offense to the Special Investigative Unit (formerly known as Broward District Schools Police Department).
(See reverse side of this form for Board Policy and rules)

Last Name: Wells First Name: Venorice Middle Name: Antonio

Work Location: Dillard 6-12 Employment Status: Employed

S.S.#: 594112180 Date of Birth: 10/11/1987

Reporting (Arrest or Final Judgment):
 Arrest or Final Judgment Date of Arrest/Final Judgment: 07/19/2019

Arresting Agency: Broward sheriff's Office

Charges

1)Sex Aslt By 24 Yoa+ Sex Bat Vict 16 Or 17 Yoa
2)Sex Aslt By 24 Yoa+ Sex Bat Vict 16 Or 17 Yoa
3)Authority Figure Solicit/Engage In Sexual Conduct With Student

Describe Circumstances

On July 12, 2019 one of my co-workers asked for a ride home I agreed to give her a ride as we reached the intersection of Oakland park blvd and state road 7 she instructed me to make a right hand turn and a left we pulled up to some apartments I pulled into a parking sport then put the car into reverse to drop her off as I begin to back up she asked do I have a minute I said sure what's up we began joking about day to day life at the club, how coach Toni bosses everyone around and how lazy she is, about how there is so many young gay boys at the club, and why my son doesn't want to go to the boys and club where we work then in the middle of the conversation my arm was resting on the armrest and she grabbed my hand and rubbed it against her at that moment I told her

Final Judgment (if applicable)

N/A

Signature: _____ Date: 7/19/2019

Return this form to the Special Investigative Unit, Security Clearance Office
Fax: 754-321-2376
or Scan and email to: selfreporting@browardschools.com
or Deliver in person to: 600 SE 3 Avenue, Ft. Lauderdale, Florida 33301

Form #4210
05/2018

THE SCHOOL BOARD OF BROWARD COUNTY, FLORIDA
SPECIAL INVESTIGATIVE UNIT
SECURITY CLEARANCE OFFICE

Tel. (754) 321-2374

Fax (754) 321-2376

Self-Reporting

School Board Policy 2405 requires the self-reporting of arrests AND final judgment of a criminal offense to the Special Investigative Unit (formerly known as Broward District Schools Police Department).
(See reverse side of this form for Board Policy and rules)

Last Name First Name Middle Name

Work Location Employment Status

S.S.# Date of Birth

Reporting (Arrest or Final Judgment) Date of Arrest/Final Judgment

Arresting Agency

Charges
1) Sex Aslt By 24 Yoa+ Sex Bat Vict 16 Or 17 Yoa
2) Sex Aslt. By 24 Yoa+ Sex Bat Vict 16 Or 17 Yoa
3) Authority Figure Solicit/Engage In Sexual Conduct With Student

Describe Circumstances
moment I told her "no this is not that type of party and I can't get down like this" meaning I don't want to do this. I told her I had to go because I wanted to catch city hall before they close and I had to take my son to football practice. she admitted she doesn't live at this address and took me to her home I dropped her off and proceeded to lauderhill city hall and home to take my son to practice

Final Judgment (if applicable)
N/A On July 12, 2019 one of my co-workers asked for a ride home I agreed to give her a ride as we reached the intersection of Oakland park blvd and state road 7 she instructed me to make a right hand turn and a left we pulled up

Signature _____ Date _____

Return this form to the Special Investigative Unit, Security Clearance Office
Fax: 754-321-2376

or Scan and email to: selfreporting@browardschools.com
or Deliver in person to: 600 SE 3 Avenue, Ft. Lauderdale, Florida 33301

Form #4210
05/2018

EXHIBIT "E"



THE SCHOOL BOARD OF BROWARD COUNTY, FLORIDA

7720 WEST OAKLAND PARK BOULEVARD, SUNRISE, FLORIDA 33351 • TEL 754-321-0725 • FAX 754-321-0930

Craig W. Kowalski, Chief
Special Investigative Unit
Tel (754) 321-0725 • Fax (754) 321-0930
Alternate Fax (754) 321-0736
www.browardschools.com

SCHOOL BOARD

Chair HEATHER P. BRINKWORTH
Vice Chair DONNA P. KORN

LORI ALHADEFF
ROBIN BARTLEMAN
PATRICIA GOOD
LAURIE RICH LEVINSON
ANN MURRAY
DR. ROSALIND OSGOOD
NORA RUPERT

HAND DELIVERED

ROBERT W. RUNCIE
Superintendent of Schools

July 23, 2019

Venorrice Antonio Wells (P00095705)
4651 NW 79 Avenue
Lauderhill, FL 33351

Re PI19/20-0001

Dear Mr. Wells:

This correspondence is provided as a formal notice of investigation into an allegation received in this office regarding an arrest. Specifically, on or about July 19, 2019, you were arrested for unlawful sexual activity with certain minor (FSS 794.05), and for offenses against student by authority figures (FSS 800.101).

You will be contacted in the near future for the purpose of giving a statement. You have the right to representation through all phases of this investigation.

While the investigation is pending, you are prohibited from contacting the complainant or any witness in any manner, directly or indirectly, regarding the allegations or any issues relating to this investigation. (See enclosed Policy 4.9, Section 5.8.) A violation of this directive could result in disciplinary action for insubordination.

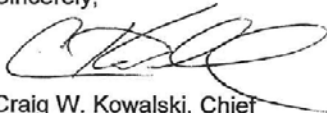
Pursuant to Policy 4.9, Section 5.7, it is your responsibility to notify this office, in writing, of your representative and their contact information.

Per Florida Statute, a copy of this letter is being forwarded to the Professional Practices Services Department of the State Department of Education. Any additional information gathered during the process of the investigation will be forwarded to the Professional Practices Services Department to determine if certificate disciplinary action is warranted.

"Educating Today's Students to Succeed in Tomorrow's World"
Broward County Public Schools Is An Equal Opportunity/Equal Access Employer

Any questions regarding the status of this investigation are to be directed to the Special Investigative Unit at 754-321-0725.

Sincerely,



Craig W. Kowalski, Chief
Special Investigative Unit

CWK: mep

Enclosure(s)

SBBC Policy 4.9, Employee Disciplinary Guidelines
The Principles of Professional Conduct for The Education Profession in Florida

cc: Alan Strauss, Director, Office of School Performance & Accountability
Sue Rockelman, Director, Talent Acquisition & Operations Instructional
Casandra Robinson, Principal, Dillard 6-12 School
Employee Representative (None on File)

My signature evidences receipt of this correspondence
and verification that the above address is correct

 7/25/19
Signature Date

Witnessed By: Detective Ronnie Dimer

Signature:  (Print) # 114

Date & Time: 07/25/2019 1:45pm

EXHIBIT "F"



THE SCHOOL BOARD OF BROWARD COUNTY, FLORIDA
7720 WEST OAKLAND PARK BOULEVARD, SUNRISE, FLORIDA 33351 • TEL 754-321-0725 • FAX 754-321-0930

Craig W. Kowalski, Chief
Special Investigative Unit
Tel (754) 321-0725 • Fax (754) 321-0930
Alternate Fax (754) 321-0736
www.browardschools.com

HAND-DELIVERED

SCHOOL BOARD

Chair HEATHER P. BRINKWORTH
Vice Chair DONNA P. KORN

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ROBIN BARTLEMAN
PATRICIA GOOD
LAURIE RICH LEVINSON
ANN MURRAY
DR. ROSALIND OSGOOD
NORA RUPERT

July 23, 2019

Venorrice Antonio Wells (P00095705)
4651 NW 79 Avenue
Lauderhill, FL 33351

ROBERT W. RUNCIE
Superintendent of Schools

Dear Mr. Wells:

This letter is to inform you that you are hereby placed on administrative reassignment, with pay, pending the outcome of a personnel investigation 19/20-0001. This reassignment is to be effective Wednesday, August 7, 2019. On this date, you will meet with Reginald Moncrief, Acting Manager, Warehousing Services, 3901 NW 10th Avenue, Oakland Park, Florida, 33309, 754-321-4721. At that time, you will be assigned a specific responsibility. Your work location within that department may change as the need arises

You are not to return to Dillard High School unless so directed by my office. Formal contact with the Broward County School Board regarding your investigative status should be conducted through my office at 754-321-0725.

Sincerely,

Craig W. Kowalski, Chief
Special Investigative Unit

CWK:mep

cc: Alan Strauss, Director, Office of School Performance & Accountability
Sue Rockelman, Director, Talent Acquisition & Operations Instructional
Casandra Robinson, Principal, Dillard 6-12 School
Reginald Moncrief, Acting Manager, Warehousing Services

My signature evidences receipt of this correspondence
and verification that the above address is correct

7/25/19
Signature Date

Witnessed By: Det. Ronnie Dimler

Signature: (Print) #114

Date & Time: 07/25/2019 1:42pm

EXHIBIT "G"



THE SCHOOL BOARD OF BROWARD COUNTY, FLORIDA

7720 WEST OAKLAND PARK BOULEVARD, SUNRISE, FLORIDA 33351 • TEL. 754-321-0725 • FAX 754-321-0930

Craig W. Kowalski, Chief
Special Investigative Unit
Tel (754) 321-0725 • Fax (754) 321-0930
Alternate Fax (754) 321-0736
www.browardschools.com

SCHOOL BOARD
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Vice Chair
HEATHER P. BRINKWORTH
DONNA P. KORN

LORI ALHADEFF
ROBIN BARTLEMAN
PATRICIA GOOD
LAURIE RICH LEVINSON
ANN MURRAY
DR. ROSALIND OSGOOD
NORA RUPERT

NOTICE TO APPEAR FOR COMPELLED STATEMENT

Date: October 15, 2019

Venorrice Wells *V.W.*
4651 N.W. 79th ave.
Lauderhill, Fl. 33351

ROBERT W. RUNCIE
Superintendent of Schools

Dear Mr. Wells


This correspondence shall serve to inform you that an investigation has been instituted concerning your performance as an employee with The School Board of Broward County, Florida, involving an allegation of Inappropriate Conduct, Case 19/20-0001 reported to this Department.

This investigation requires that you give a compelled statement that will be taken on Thursday, October 24, 2019, at 10:00 AM in the Office of the Broward District Schools Special Investigative Unit, 7720 W. Oakland Park Blvd., Sunrise (TSSC Building-3rd floor).

You have the right to a representative of your choice to be present at the time of the statement. However, any information disclosed to you or your representative must remain confidential until completion of the investigation.

Your failure to either appear on the scheduled date and to provide a statement regarding the performance of your duties, or the premature disclosure of the matters under investigation, would constitute gross insubordination and will lead to disciplinary action up to and including termination.

Therefore, if either the date or time is inconvenient, you are hereby directed to contact Detective Frank Canellas at Office # 754-321-0725 or my Cell # 954-205-8167 immediately upon receipt hereof to reschedule the statement.

Sincerely,


Detective Frank Canellas #116
Special Investigative Unit
Broward District Schools

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Broward County Public Schools Is An Equal Opportunity/Equal Access Employer

EXHIBIT "H"



**BROWARD DISTRICT SCHOOLS
POLICE DEPARTMENT**
BROWARD COUNTY PUBLIC SCHOOLS



402.1A

Enclosure A-1

PUBLIC EMPLOYEE GARRITY WARNING

I wish to advise you are being questioned as part of an official investigation for the School Board of Broward County. You will be asked questions specifically, directly and narrowly related to the performance of your official duties or fitness for duty. You are entitled to all the rights and privileges guaranteed by the law and the Constitution of the United States, including the right not to be compelled to incriminate yourself. I further wish to advise you that if you refuse to testify or to answer questions relating to the performance of your official duties or fitness for duty, you could be subject to disciplinary action up to and including termination. If you do answer, neither your statement, nor any information or evidence which is gained by reason of such statement, can be used against you in any subsequent criminal proceedings. However, these statements may be used against you in relation to subsequent discipline.

I wish to further advise you, that since this is an official investigation you are required to tell me the truth, and nothing but the truth. If during this investigation it is determined that you have intentionally given false information, then Garrity will no longer apply, and you will have exposed yourself to perjury which is a 3rd degree felony and an arrestable offense. Do you understand what I have read to you?

BY:
(BDSPD / School Board of Broward County) CCN# 116

DATE: 10/24/2019

(Employee Signature) My signature acknowledges my receipt and understanding of this notice

(Witness)

402.1A

EXHIBIT "I"



THE SCHOOL BOARD OF BROWARD COUNTY, FLORIDA

7720 WEST OAKLAND PARK BOULEVARD, SUNRISE, FLORIDA 33351 • TEL 754-321-0725 • FAX 754-321-0930

Craig W. Kowalski, Chief
Special Investigative Unit
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www.browardschools.com

SCHOOL BOARD
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Vice Chair DR. ROSALIND OSGOOD
LORI ALHADEFF
ROBIN BARTLEMAN
HEATHER P. BRINKWORTH
PATRICIA GOOD
LAURIE RICH LEVINSON
ANN MURRAY
NORA RUPERT

ELECTRONIC MAIL

ROBERT W. RUNCIE
Superintendent of Schools

February 5, 2019

Venorrice Antonio Wells (P00095705)
4651 NW 79 Avenue
Lauderhill, FL 33351

Dear Mr. Wells:

The Professional Standards Committee met on January 22, 2020, and reviewed the investigative report submitted under the Special Investigative Unit case number P119/20-0001. After careful review by the committee, it has been determined that sufficient factual or legal basis exists to establish just cause for inappropriate conduct, to recommend the disciplinary action of termination.

Please be advised by way of this correspondence that you have been scheduled for a pre-disciplinary conference on February 18, 2020, at 8:30 am in our office located on the third floor of the Technical Support Services Center, 7720 West Oakland Park Boulevard, Sunrise, Florida 33351.

You have the right to representation at this conference. At this conference, you and/or your representative will be given the opportunity to present reasons and submit additional information and documentation as to why the proposed recommended disciplinary action should not be imposed. If you are unable to be present at this conference, you must contact our office at least forty-eight (48) hours prior to the conference.

Your failure or refusal to appear at this conference will be considered a waiver of this procedural requirement.

If you wish to waive this pre-disciplinary meeting, please notify this office in writing within five (5) days of receipt of this letter.

You were previously furnished with a copy of the investigative report. Be reminded that you are not to disseminate this document to the public and/or media since it may contain protected information.

"Educating Today's Students to Succeed in Tomorrow's World"
Broward County Public Schools Is An Equal Opportunity/Equal Access Employer

Questions regarding this correspondence should be directed to my office at 754-321-0725.

Sincerely,



Craig W. Kowalski, Chief
Special Investigative Unit

CWK:mep

cc: Todd LaPace, Director, Office of School Performance & Accountability
Sue Rockelman, Director, Talent Acquisition & Operations Instructional
Cassandra Robinson, Principal, Dillard 6-12 School
Doug Griffin, Assistant General Counsel
Eric Abend, Assistant General Counsel
Andrew Carrabis, Assistant General Counsel
Johnny L. McCray Jr., Employee Representative

EXHIBIT "J"



THE SCHOOL BOARD OF BROWARD COUNTY, FLORIDA

7720 WEST OAKLAND PARK BOULEVARD, SUNRISE, FLORIDA 33351 • TEL 754-321-0725 • FAX 754-321-0930

Craig W. Kowalski, Chief
Special Investigative Unit
Tel (754) 321-0725 • Fax (754) 321-0930
Alternate Fax (754) 321-0736
www.browardschools.com

SCHOOL BOARD

Chair DONNA P. KORN
Vice Chair DR. ROSALIND OSGOOD

LORI ALHADEFF
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HEATHER P. BRINKWORTH
PATRICIA GOOD
LAURIE RICH LEVINSON
ANN MURRAY
NORA RUPERT

ELECTRONIC MAIL

ROBERT W. RUNCIE
Superintendent of Schools

February 25, 2020

Venorrice Antonio Wells (P00095705)
4651 NW 79 Avenue
Lauderhill, FL 33351

Dear Mr. Wells:

At the request of your attorney, Johnny McCray the pre-disciplinary conference that was scheduled for February 19, 2020, has been rescheduled for March 12, 2020, at 11:00 a.m. This conference remains scheduled in my office located on the third floor of the Technical Support Services Center, 7720 West Oakland Park Boulevard, Sunrise, Florida.

Your failure or refusal to appear at this conference will be considered a waiver of this procedural requirement.

Sincerely,

Craig W. Kowalski, Chief
Special Investigative Unit

CWK:mep

cc: Todd LaPace, Director, Office of School Performance & Accountability
Sue Rockelman, Director, Talent Acquisition & Operations Instructional
Cassandra Robinson, Principal, Dillard 6-12 School
Doug Griffin, Assistant General Counsel
Eric Abend, Assistant General Counsel
Andrew Carrabis, Assistant General Counsel
Johnny L. McCray Jr., Employee Representative

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