

THE SCHOOL BOARD OF BROWARD COUNTY FLORIDA

JAMES F. NOTTER, Superintendent of  
Schools,

Petitioner,

CASE NO.: 204

vs.

LAMONT ROBERTS,

Respondent.

\_\_\_\_\_ /

**ADMINISTRATIVE COMPLAINT**

Petitioner, JAMES F. NOTTER, Superintendent of Schools of Broward County, Florida, by and through his undersigned counsel, the Law Offices of Panza, Maurer & Maynard, P.A., files this administrative complaint pursuant to Chapter 120, 1001 and 1012 of the Florida Statutes as well as Chapter 6B-1 and 6B-4 of the Florida Administrative Code and states 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 James F. Notter, who is the Superintendent of Schools of Broward County, Florida. His address is located at 600 Southeast Third Street, Fort Lauderdale, Florida 33301.
3. The Petitioner is statutorily obligated to recommend the placement of school personnel and to require compliance in observance with all of the laws, rules and regulations.

Any violation thereof shall be reported with the appropriate disciplinary action against any School Board personnel failing to comply therewith, inclusive of the Respondent Lamont Roberts.

4. The Respondent, Lamont Roberts is an employee of the Broward County School Board and is currently employed as a teacher at Dillard High School.

5. The last known address of the Respondent, Lamont Roberts is 4551 N.W. 67<sup>th</sup> Terrace, Miami, Dade County, Florida 33147.

## **II. ADMINISTRATIVE CHARGES**

The Petitioner, James F. Notter, alleges as follows:

6. Respondent, Lamont Roberts, was found in possession of controlled substances to wit, cocaine and cannabis.

## **II. JUST CAUSE**

Just cause exists for the relief requested pursuant to § 1012.33(1)(a) and § 1012.33(4)(c), the Respondent's contract, School Board Rules and Regulations, the Code of Ethics of the education profession, and the employee disciplinary guidelines promulgated by the School Board including but not limited to the following:

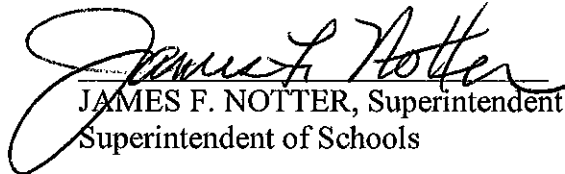
(A) Moral Turpitude: The Respondent through the above-described conduct has violated § 1012.33(4)(c) Fla. Stat. and Rule 6B-4.009(6) of the Florida Administrative Code and his actions constitute a crime of moral turpitude. The Respondent's conduct as set forth herein evidences a baseness, vileness or depravity in his private and social duties.

(B) Duties of Instructional Personnel: The Respondent through the above-described conduct has violated § 1012.33(4)(c) Fla. Stat. and Rule 6B-4.009(2) of the Florida Administrative Code and his actions constitute immorality, that is conduct inconsistent with the

standards of public conscience and good morals. Additionally the Respondent's above-described conduct further violates the Code of Ethics of the Educational Professional, Rule 6B-1.001, 6B-1.006, Florida Administrative Code. The Respondent's conduct as factually set forth herein is sufficiently notorious to bring the Respondent and/or the educational profession into public disgrace or disrespect and impair the Respondent's service in the community.

**WHEREFORE**, based upon the foregoing, the Petitioner, James F. Notter, Superintendent of Schools, recommends that the School Board, subsequent to providing requisite notice, terminate the Respondent, Lamont Roberts from his employment as an instructional employee based upon the foregoing facts and legal authority.

DATED this \_\_\_\_ day of \_\_\_\_\_, 2010.

  
JAMES F. NOTTER, Superintendent  
Superintendent of Schools

Respectfully submitted,

PANZA, MAURER & MAYNARD, P.A.  
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BY:

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