

THE SCHOOL BOARD OF BROWARD COUNTY FLORIDA

JAMES F. NOTTER,
Superintendent of Schools,

CASE NO.:161

Petitioner,

vs.

CHERYL GRAMPA,

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 Avenue, Fort Lauderdale, Broward County, 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, CHERYL GRAMPA.

4. The Respondent, CHERYL GRAMPA, is an employee of the Broward County School Board and is currently employed as a Teacher.

5. The last known address of the Respondent, CHERYL GRAMPA, is 2860 S.W. 73rd Way, Unit 1410, Davie, Florida 33314.

6. The legal basis for Respondent, CHERYL GRAMPA's suspension is for misconduct in office that has been deemed so serious as to impair her effectiveness within the District. (See § 1012.33 (1)(a), (6)(a)).

II. ADMINISTRATIVE CHARGES

7. During the 2009/2010 school year, the Respondent, CHERYL GRAMPA, engaged in inappropriate conduct and contact with a minor student ranging from soliciting and allowing students to massage her, in exchange for rewards, allowing students to touch her in an inappropriate manner and failing to take reasonable and appropriate corrective action with respect to improper touching.

8. 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:

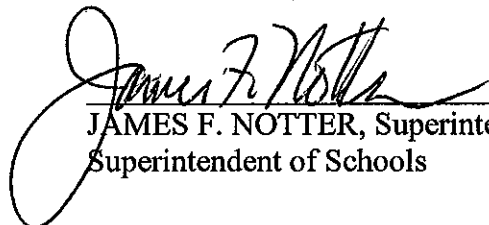
(A) Misconduct in Office. The Respondent through her above-described conduct has violated § 1012.33 (1)(a) and § 1012.33 (4)(c) Fla. Stat. and Rule 6B-4009 (3) of the Florida Administrative Code, and her actions constitute misconduct in office through violations

of various provisions of the Code of Ethics of the Educational Professional, Rule 6B-1.001, 6B-1.006 Florida Administrative Code.

(B) Immorality. 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 her 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, suspend the Respondent, CHERYL GRAMPA, for a term of five (5) days, require Respondent CHERYL GRAMPA to complete classroom management courses approved by the School Board of Broward County, and notify CHERYL GRAMPA that the disciplinary actions recommended herein constitute a "last chance" agreement and that further violations of any type could result in dismissal.

DATED this 14 day of January, 2011.



JAMES F. NOTTER, Superintendent
Superintendent of Schools

Respectfully submitted,

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