

BEFORE THE SCHOOL BOARD OF BROWARD COUNTY, FLORIDA

ROBERT W. RUNCIE,
Superintendent,

Petitioner,

vs.

CLOVERLY CAMERON,

Respondent.

ADMINISTRATIVE COMPLAINT

COMES NOW, the Petitioner, THE SCHOOL BOARD OF BROWARD COUNTY, FLORIDA, through its Superintendent, ROBERT W. RUNCIE, and files this Administrative Complaint 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 Robert W. Runcie, who is the Superintendent of Schools of Broward County, Florida. His address is 600 Southeast Third Avenue, Fort Lauderdale, Broward County, Florida 33301.
3. The Petitioner is statutorily obligated to recommend the placement of School Board

personnel, and require compliance and observance by all personnel with all laws, rules and regulations. See ' 1012.27, Fla. Stat.

4. The employee against whom discipline is recommended, Respondent, Cloverly Cameron, is currently employed as a pre-kindergarten teacher at Broward Estates Elementary School.

5. The legal basis for Ms. Cameron's termination is misconduct in office and insubordination, based on her behavior in grabbing a student by the arm and digging her nails into the student such that a bruise remained several days later. See ' 1012.33, Fla. Stat.; Fla. Admin. Code r. 6A-5.056, 6A-10.081.

II. ADMINISTRATIVE CHARGES

The Petitioner, Robert W. Runcie, alleges as follows:

6. This recommendation is based upon allegations that the Respondent took a pre-kindergarten student by the arm, and dug her nails into him, hurting him.

7. On March 5, 2013, this matter was referred to the Broward District Schools Police Department by Principal Cyntheria Hunt, at Broward Estates Elementary School.

8. The Respondent was immediately notified of the pending investigation and administratively reassigned during it.

9. A formal investigation was conducted by Detective Johanna Davidson, who obtained statements from students in the classroom (including the student at issue), the Respondent and a

paraprofessional in her classroom, along with color photographs of the student's arm, and the matter was submitted to the Professional Standards Committee for its review.

10. The Professional Standards Committee found probable cause that the Respondent had engaged in a battery and recommended her termination from employment.

11. A pre-disciplinary conference was held with the Respondent, at which she was given the opportunity to again express her position and request any additional information she thought necessary for my consideration.

12. Upon a review of the investigative file, the Professional Standards Committee's recommendation, and the Respondent's employment history, which includes prior allegations of inappropriate student discipline and clear directives about discipline and consequences in her classroom, I agree with the Professional Standards Committee that this conduct warrants the Respondent's termination from her employment with the School Board of Broward County.

13. In accordance with Florida law, this recommendation for suspension must be reviewed, and approved by the School Board. *See* ' 1012.33, Fla. Stat.

14. If the ultimate decision is adverse to her, the Respondent may challenge the decision by seeking an administrative hearing pursuant to Chapter 120 of the Florida Statutes.

EXECUTED this ____ day of October, 2013.



ROBERT W. RUNCIE
Superintendent of Schools

cc: Debra P. Klauber, Esq.
Cadre Attorney

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

Claudia Cameron
Signature Date

Witnessed By: FRANK ALFIERI

Signature: Frank Alfieri (Print)

Date & Time: 12-23-13 12:12 PM