

# BAKER DONELSON

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## MEMORANDUM

**To:** Robert Scamardo  
**From:** Phillip D. Sharp  
**Date:** September 14, 2021  
**Re:** Complaint filed by Gary Rosier on June 21, 2021

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## SUMMARY OF ASSIGNMENT

On June 29, 2021, the Fort Bend Independent School District (“FBISD” or “the District”) retained Baker, Donelson, Bearman, Caldwell & Berkowitz (“the Firm”) to investigate the Level One Grievance (“the Grievance”) filed on June 21, 2021, by Garrett Rosier (“Rosier”), the former Executive Assistant to the Board of Trustees. Rosier alleges that Denetta Williams (“Williams”), in her capacity as a trustee, created a hostile and threatening work environment, harassed and impeded Rosier in the performance of his duties, and subjected him to public and private defamation of character, including repeated public calls for his termination. Rosier alleges that Williams mistreated him because of his race (white) and gender (male). Williams denies the allegations.

The initial scope of the investigation (“Investigation”) included Williams’ own inquiry whether Rosier had filed the Grievance at the suggestion of Board member Jim Rice (“Rice”) and whether individuals at the District, either acting alone or in concert, falsified records, specifically emails, relevant to the claim.

On or about August 2, Rosier complained that Williams had retaliated against him for filing the Grievance. Accordingly, the District expanded the scope of the Investigation to include the additional charge of retaliation.

Among the standards that apply to this Investigation are those found in the District's policies and procedures, specifically those found in the DIA (Local) and DGBA (Local) policies, and in the Board of Trustees' Code of Ethics. On Tuesday, August 3, Rosier submitted his notice of resignation, asserting that his continued mistreatment at the hands of Williams is tantamount to constructive discharge.

In an undated letter addressed to the "Executive Director of Talent Experience," Rosier requested that the Grievance be abated "until the investigation report is completed."

### **THE INVESTIGATIVE PROCESS**

Included with Rosier's June 21 Grievance are exhibits provided by Rosier in support of his allegations. Williams, in turn, provided evidentiary support of her defense to Rosier's claims. Rosier provided additional evidence during the Investigation in the form of audio tapes, videotapes and copies of additional documents not included with the original exhibits. Neither the exhibits to the Grievance nor the exhibits offered by Rosier and Williams during the Investigation are appended to this report but are identified in the index attached and cited throughout.

The Investigation included interviews of persons with knowledge of relevant facts identified in the Grievance, examination of records kept by the District, recordings of telephone calls, copies of Facebook posts, and an in-person examination of electronically stored information at FBISD conducted with the assistance of FBISD IT personnel. The following individuals provided information through the interview process:

Garrett Rosier  
Denetta Williams  
Charles Dupre  
Diana Sayavedra  
Dave Rosenthal  
Jim Rice  
Jessilyn Allen  
Yadira Vasquez  
Rarish Patel  
Jojo Jacob  
Mitzi Patin  
Gregory Gonsoulin  
Long Pham  
Jesse Johnson

Because the Grievance is not currently in litigation, the Firm lacks subpoena authority to compel production of privately owned telephones and personal computers. The Investigation did not include independent forensic examinations of electronically stored information, including privately owned laptops, iPads, telephones, or individuals' private email accounts. Similarly, the Firm was unable to compel the attendance of witnesses who were under no obligation to make themselves available for interviews.

Each finding stated herein relies on the greater weight and preponderance of the credible evidence. The greater weight and preponderance of the credible evidence is not determined solely by the number of exhibits, the size of the documentary evidence or on the number of witnesses

supporting an allegation. The Investigation recognized the potential for witness bias, as well as other factors to the extent ascertainable that may bear on the credibility of the evidence. The Investigation gave equal time to Rosier's and Williams' recitations of facts and explanations.

### **OBSERVATIONS**

The following general assessments place the findings in context:

1. Williams ran for the Board holding herself out as an aggressive advocate for the underserved students at FBISD, primarily students of color. In some respects, she is exactly that. She has not limited her aggression to issues involving at-risk school children, however, and the evidence, particularly from Williams herself, invokes "the law of instruments," meaning, to a hammer, everything is a nail. For Williams, that is particularly true where the District is concerned. Williams' combativeness, which she openly acknowledges and every witness with any meaningful contact with her observed, is at the heart of most episodes in Rosier's Grievance. In many respects, at least initially, Rosier's experience was collateral damage in Williams' campaign against the District, and his job as board liaison placed him squarely between Williams and an organization that had been the target of her disdain for years.
2. Whatever the cause, Williams shows no remorse or compunction for the way she behaved and claims instead to be guiltless of all charges and the victim of a smear campaign. In that vein, throughout the Investigation, Williams displayed an alarming lack of self-awareness by admitting without hesitation to some of the more flagrant and embarrassing portions of the evidence, defending herself rather by claiming Rosier was not the focus but someone else.

3. Williams believes the Administration and a group of Board members, past and present, continue to be in league against her to rob her of her credibility and authority. To hear Williams tell it, Rosier's complaint is but a part of a broader scheme with many conspirators. To that end, Williams believes the Grievance is contrived, insincere, groundless and probably initiated by someone other than Rosier to discredit her.
4. There is very little chance Williams has read the Board's Code of Ethics, let alone understands that its tenets apply to her. Whether she is unaware the Code exists or has actively chosen to ignore it, Williams has violated its principles in any number of respects, particularly the pledge to be fair, just, impartial and objective in all her actions, to uphold the District's policies, to conduct herself with civility and decorum, to accord others with the respect she wishes for herself, to do her best to weigh all factors, to make informed decisions and, at least in the Investigation, to tell the truth. For example, even during the Investigation, Williams dismissively referred to Rosier as a "test dummy" for the schemes of others, compared him to "a middle school cheerleader" seeking attention, and was seemingly oblivious to what those descriptions reveal about her or whether they lend overall credence to Rosier's charges.
5. Rosier's job placed him in a subservient role to Williams, and Williams was nothing if not acutely aware of his place and hers within the District's hierarchy. Accordingly, the relationship between Williams and Rosier is the story of a Board member mistreating an administrative assistant. Though not in every instance, modifying "Board member" with "African-American" and "administrative

assistant” with “white, male” brings what happened between them into sharper focus.

6. Williams admittedly saw Rosier as a man doing a woman’s job and, as a result, initially questioned if he might be “part of our homosexual community.” Such indefensible stereotyping underscores how gender perception shaped the way Williams behaved and highlights Williams’ lack of self-awareness, not to mention her ignorance of the District’s policies.
7. Williams demonstrates an acute sensitivity to racial and ethnic distinctions, even within the Black community. Differences between people is a central feature of how she described others during the Investigation, and it is easy to see why Rosier and others inferred racist motives behind Williams’ behavior, considering that she herself classified people along racial lines during the Investigation, even when the questioning was on an unrelated topic.
8. Whether Rosier is or is not unduly sensitive to criticism from superiors is irrelevant to the charges, particularly under the facts of the case. To suggest otherwise is to imply that an alleged hostile work environment is intolerable only among those without thicker skins.
9. Practically everything Rosier describes in his complaint deals, in one way or another, with communication and communication failures, meaning the delivery of information from one person to another and to whom the lapses are attributable. At no point during the events described in the Grievance or during the Investigation did Williams acknowledge that she and not others may be responsible for any of the missteps. Instead, and further exemplifying her lack of self-awareness,

Williams purports to have a superior understanding of electronic communications and the vagaries of information technology to that of others involved in the case.

### **SUMMARY OF FINDINGS**

- 1. Race and gender-based motivating factors account for some, but not all, of Williams' behavior.**
- 2. The observations of witnesses form the basis of the findings of race and gender-based mistreatment rather than direct, objective evidence in the form of written or spoken epithets or open criticism drawn along racial lines.**
- 3. There is no credible evidence that Rosier or anyone at the District falsified emails to discredit Williams or shape the evidence against her. Williams' public accusations against Rosier and others on this subject are reckless and unfounded.**

- 4. Violations of the Code of Ethics**

Williams violated the Code of Ethics by failing to be fair, just, impartial and objective in her dealings with Rosier, failed to treat him with civility and decorum, failed to show him the respect she wishes for herself, and, at least during the Investigation, almost certainly failed to tell the truth. In several important respects, Williams' descriptions and accounts of events are squarely at odds with those of every other witness and are likely mischaracterizations on her part calculated to deflect blame away from herself and onto others.

- 5. Retaliation**

The greater weight and preponderance of credible evidence establishes that Williams embarked on a willful, deliberate campaign to attack Rosier and the Grievance process by urging the board to derail the Grievance rather than allow it to run its course. Williams' actions in

response to the Grievance have gone well beyond answering the charges or merely defending herself.

6. **There is no credible evidence that Rosier filed his Grievance at the urging or suggestion of Jim Rice.**

### **PLACING THE GRIEVANCE IN CONTEXT**

Where Williams and the FBISD are concerned, Rosier's story began *in medias res*--in the middle of things--and Williams' history of disputes, grievances, grudges, suspicions, rancor and raw open hostility created the backdrop to Rosier's experiences and, with it, the evidence that supports his allegations and the evidence that does not. Long before Rosier came to the District, Williams had been locked in a series of battles with the District since a child she raised as her daughter started going to school there 13 years ago. The initial dispute erupted over discipline meted out after a fight at school and was followed years later by a truancy charge resulting in Williams' own criminal conviction. When Williams was a Board candidate, she had an outstanding *capias* warrant (and at least one witness who was interviewed believes there may still be one) arising from the 2013 criminal conviction, and it was the fear of that warrant being served that lies behind the September 9, 2020, exchanges described by Rosier as the onset of his mistreatment.

Targets of Williams' anger and resentment through the years include various people associated with the District, including former Superintendent Charles Dupre ("Dupre"), former Board President Adeola Heyliger ("Heyliger"), current Board member Shirley Rose-Gilliam ("Rose-Gilliam) and others. Williams blames Rose-Gilliam as an accomplice in the alleged mistreatment of Williams' daughter. Williams has blamed Dupre for years for, among other things, being insufficiently mindful of the wellbeing of students of color and for not being "Black



enough,” and Heyliger for acting in league with others to thwart Williams’ campaign for the board. Justifiably or not, Williams has blamed members of the FBISD Administration and Board of malfeasance for years, including criminal conduct. As relentless and focused as she is, if FBISD is the white whale, Williams is Ahab in hard pursuit, tireless and insistent on righting wrongs, real or imagined.

It is difficult not to question whether Williams’ heightened sensitivity to racial identity played a role in her relationship, such as it was, with Rosier. For example, Williams herself acknowledges that, within the Black community, she openly draws a distinction between American descendants of slavery, with whom Williams identifies, and immigrants of African descent, which, according to Williams, include Dupre, Allison Drew, whom Williams defeated in the Board election, and others. It is difficult not to infer that Williams’ heightened sense of the differences between people based on ancestry played a role in how she treated Rosier. Williams may or may not be an equal opportunity antagonist, but she is not colorblind.

The question is not whether Williams readily attacks people across the color spectrum but whether Rosier’s whiteness and maleness played any role, large or small, in how Williams treated him. The greater weight and preponderance of the credible evidence provided by witnesses, including Williams herself unwittingly, suggest they did. At least initially, Rosier was not so much targeted but merely in the line of fire. Over time, that changed, and Williams took notice of Rosier as more than just a conduit. That is not to say that certain sources of evidence, meaning witnesses who support that conclusion, may not have their own axes to grind with Williams for having been the targets of her public and private scorn for years. For that reason, the Investigation has not ignored the possibility of witness bias. A discernable cause for bias does not exist among all the witnesses, however. Evidence from one or more arguably neutral witnesses with no personal

history of disagreements with Williams and no apparent reasons for bias tips the scale in Rosier's favor.

Rosier's interactions with Williams had an inauspicious beginning in September 2020, discussed below, followed by period of relative quiet. In the interim, Williams claims that she requested that Rosier administer the oath of office to her when she was a new board member, an event captured in a picture of them both that Williams has kept. Williams points to that photograph as evidence she bore Rosier no ill will on account of his race or gender. Acrimony erupted, however, months later in a series of testy emails that were a precursor of worse things to come. In May, Williams claimed that Rosier did not secure the proper accommodations for her to attend a TASB convention, followed by another rancorous exchange in which Williams accused Rosier of not sending her an invitation to a school Board meeting and later of falsifying email records. Days later, Williams demanded that henceforth Rosier no longer serve as liaison to her for any school-related purpose and, in essence, demanded by fiat that Rosier's duties as Board secretary be reduced.

Whether in response to Williams' demand or independently on her own initiative, Acting Superintendent Diana Sayavedra ("Sayavedra") instructed Rosier to cease all communications with Williams in hopes that the acrimony between them would dissipate and that, at least in the interim, Rosier would be spared Williams' mistreatment. It was Sayavedra's stated purpose, which is both credible and understandable, to protect Rosier from further rough treatment at Williams' hands. Rosier, meanwhile, characterized Sayavedra's instructions as a "cease and desist" order that shrank his job responsibilities such that his further dealings would be with only six-sevenths of the Board he was hired to serve. Within weeks, Rosier filed his Grievance.

## INSTANCES OF ALLEGED MISTREATMENT

### 1. September 2020

The first failed communication began with a hand delivery.

Rosier had served in an administrative capacity for going on three years at the time he resigned. Among his administrative duties were delivering school-related information to Board members and Board candidates and sending electronic meeting invitations. On September 9, 2020, Rosier directed that a packet of information be delivered to Williams and followed the District's practice of using its campus police as the courier service. There is no evidence to suggest that Rosier singled Williams out to receive her September 9, 2020, delivery from a uniformed police officer.

When Officer Johnson tried to deliver the packet to the address the District had on file, an elderly woman, whom Williams later identified as her mother, greeted him at the door and denied that Williams lived at that address and denied even knowing who Williams is. Learning that the delivery had not been made, Rosier asked Dupre for suggestions, and Dupre, in turn, told Rosier to email Williams to verify her address. Rosier then sent Williams an email and a text to confirm where she lived.<sup>1</sup> In turn, Williams greeted him with "WHY ARE YOU EMAILING ME? DO YOUR JOB PER FBISD Board Policy. Leave the politics to those not collecting a check from the District, OK? I signed up in February. YOU have all the information required" (all caps in the original).<sup>2</sup> At or near the same time, Williams responded to Rosier's text with a voice message accusing him of continuing to "harass" her about her home address.<sup>3</sup>

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<sup>1</sup> Exhibit 3 (Rosier Hostile Attachment 2); Exhibit 5

<sup>2</sup> Exhibit 3 (Rosier Hostile Attachment 2)

<sup>3</sup> Exhibit 4; Exhibit 5

Rosier, after the initial shock wore off, at first speculated that Williams' rudeness, otherwise inexplicable, may have stemmed from her fear that Rosier was investigating whether she lived in the district and was eligible for Board candidacy. There is no question that the failed hand delivery and Dupre's instructions prompted Rosier's inquiry and not a curiosity over Williams' eligibility to serve.

Meanwhile, Williams' mother was purportedly fearful that the uniformed officer at her door had come to serve the outstanding capias warrant. Williams' responses to Rosier's email and text, while rude, were made at a time when her elderly mother had evidently expressed alarm over the arrival of police looking for her daughter, and it is possible that whatever anxiety her mother displayed contributed to Williams' tone. Rosier, meanwhile, had no reason to suspect the mother of a Board candidate, for her daughter's sake, might be looking over her shoulder for the police.

Although Williams probably met Rosier prior to the September 9 exchange and certainly knew his gender, there is nothing to suggest that her September 9 email, impolite though it is, was prompted by hostility based on race or gender. The same is true of her voice message. Considering that the exchange was likely Rosier's first memorable encounter with Williams, it is understandable that, when he recalled it months later, he attributed Williams' discourtesy to something other than appalling manners. In fact, a good deal more than bad manners probably does explain Williams' response, but it likely had nothing to do with Rosier in particular. If Williams' mother had not been fearful of her daughter's arrest, justifiably or not, and simply accepted the packet from the officer, the parties would have avoided this episode altogether. Dupre had previously advised board candidates that campus police customarily made such deliveries, but either Williams forgot, Williams forgot to tell her mother, or her mother forgot.



during her interview but left it out of the group of exhibits she sent for consideration, even after specifically stating she wanted it in the record. That is why her email exchange with Rodriguez is missing from the exhibit index. The District can confirm whether that exchange, in fact, took place by reviewing its own IT records. In any event, Williams' failure to forward it is likely an innocent oversight. Assuming such an email exists, it shows that Williams was likely nowhere near as perturbed as her email to Rosier suggests. Why she acted differently toward Rodriguez on the same subject remains unknown. Perhaps Williams held Rosier accountable for the mishap and not Rodriguez, and thus her different tone.

Considering the events that unfolded months later, it is easy to see why Rosier included this email in his Grievance. Race and gender-based motives did not likely prompt the December 14 email, however, but that is not to say it shows nothing. It is another in a series of impolite reactions from Williams where "please" and "thank you" would have worked far better.

### 3. March 31

The next communication misstep involved a calendar invitation.

Claiming she had not received an invitation to a March 31 Board meeting, Williams sent Rosier an email saying, "Send my link to the open session like NOW."<sup>7</sup> Like the email of December 14, this command is not courtesy's finest hour, nor does it comport with the requirement in the Code of Ethics that Board members conduct themselves with civility.<sup>8</sup> Rosier likely includes it in the Grievance because it is consistent with other examples of how Williams behaved and not because it independently shows race or gender-based antipathy. The March 31 email from Williams is the second instance of her claiming she did not receive an invitation to a

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<sup>7</sup> Exhibit 3 (Rosier Hostile Attachment 15)

<sup>8</sup> Exhibit 19

virtual meeting. Other than that, there is probably little to be gleaned from it other than Williams was impatient to dial in and less than courteous about it.

4. April 5

Another misreading of emails formed the next incident.

By this time, justifiably or not, Rosier's suspicions about Williams had begun to mount, as likely did the suspicions of others. Williams, this time mistaken about when a board meeting was scheduled, sent an email on April 5 at 5:49 to Rosier, Heyliger and others wanting to know why she was not notified of the meeting that night and was advised by Heyliger at 6:36 that no such meeting had been calendared.<sup>9</sup> At 6:22, some 14 minutes earlier, Williams had sent an email, apparently to herself and copying Rosier, saying "Canceled . . . I don't read his emails. Disregard."<sup>10</sup>

Rosier reads the 6:22 email from Williams, dismissive as it appears, to mean that Williams does not read emails from him. In hindsight, considering that Williams' earlier emails to Rosier were inelegant at best and openly rude at worst and that she later demanded that Rosier have no further contact with her, his interpretation is understandable. But it may not be right.

Williams contends she was not referring to Rosier and offers as proof her use of "his," the third-person, masculine, singular possessive pronoun. If she had meant to refer to Rosier, so she claims, she would have used the second-person possessive "your." Strictly speaking, Williams' explanation has a grammatical crack in it, as explained below, but that does not suggest that Williams meant to be rude to Rosier this time and certainly not in a way that suggests a racist or gender-biased motive.

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<sup>9</sup> Exhibit 3 (Rosier Hostile Attachment 16)

<sup>10</sup> Exhibit 3 (Rosier Hostile Attachment 17)

Williams maintains that she was referring to emails from Dupre, saying in essence that she did not read Dupre's emails.<sup>11</sup> A sitting Board member openly admitting during an investigation into her alleged misconduct that she did not read emails from the Superintendent raises concerns of its own, but the explanation is probably accurate, considering it is consistent with the disdain Williams showed for Dupre for years. If Williams were looking to concoct a story to deflect blame from herself, there are certainly less incriminating ways to go about it. It does raise the question, however, how Williams expected to do her best "to weigh all factors and make informed decisions" as a Board member while ignoring emails from the Superintendent of the District she swore to serve.<sup>12</sup>

The only copy of this email in the record shows that it was sent by Williams to Williams, copying Rosier.<sup>13</sup> If there is another copy of the email with a wider addressee list or an email showing Rosier as a named addressee, it is not in the record. Because Rosier is only *copied* on the email and is not a direct addressee, Williams' grammatical explanation has imprecise footing. This is not a test on pronoun antecedent references, however. In fact, because Williams' email was sent some 14 minutes *before* Heyliger responded to say there was no meeting that night, it is unclear why Williams sent her 6:22 email at all or to whom it was intended. The April 5 email from Williams may be evidence of Williams' disdain for Rosier that grew more and more obvious during the following months, or it may mean nothing of the kind. Williams may simply have been making a note to herself—for whatever reason--on which Rosier was copied because she had determined on her own before Heyliger responded that there was no meeting. The evidence in

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<sup>11</sup> Exhibit 12

<sup>12</sup> Exhibit 19

<sup>13</sup> Exhibit 3



the record surrounding the April 5 event is too unclear to form the basis for any reliable conclusions supporting Rosier's claims.

But the April 5 exchange hit a nerve with Rosier, hard enough for him to complain to Heyliger about it, and Williams points to Heyliger's response as proof that others are in league against her. In the Grievance, Rosier states that when he complained to Heyliger, she told him to forward any other emails to her "so that she could build a case against [Williams]."<sup>14</sup> Rosier claims not to know what Heyliger meant or if a "case" was ever developed. Heyliger, who is no longer in office and under no obligation to participate in the Investigation, declined the request to be interviewed. Before April 5, Rosier had already complained about Williams to Heyliger and Dupre, so that when he did so again to Heyliger on that date, she was not hearing it for the first time. Whether Heyliger's remarks indicate that at least one member of the Board was gathering evidence against Williams is unclear, but that seems to be the upshot of what Heyliger was saying, assuming Rosier is quoting her accurately. Whatever evidence Heyliger may have gathered remains unknown, as does what that evidence may show.

Heyliger lost her re-election bid, and nothing else about the "case" Rosier said she was building surfaced during the Investigation. In July, Williams took to Facebook to publish an excerpt from the Grievance in which Rosier quotes Heyliger, presumably to show the world there is a plot against her.<sup>15</sup>

By itself, posting the excerpt on Facebook may not prove any of Rosier's claims, but it does violate the District's confidentiality policy regarding employee complaints: "To the greatest extent possible, the District shall respect the privacy of the complainant . . . and witnesses."<sup>16</sup>

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<sup>14</sup>Exhibit 3 (unnumbered narrative page)

<sup>15</sup> Exhibit 9

<sup>16</sup> Exhibits 8 and 1

Nothing about posting an excerpt from Rosier’s Grievance on Facebook demonstrates trying “to the greatest extent possible” to respect Rosier’s privacy or the privacy of witnesses, including in this instance Heyliger. One purpose of the confidentiality policy is to prevent the chilling effect of public gaze during an investigation, if not the outright intimidation of witnesses to speak freely. Considering Heyliger declined the request for an interview *after* Williams’ Facebook post, it is worth questioning if Williams published the excerpt mentioning Heyliger by name hoping to discourage Heyliger’s participation. If so, then the plan appears to have worked, assuming Heyliger knew about the Facebook post. Whether Williams does or does not have reason to suspect Heyliger of plotting against her, a Facebook post that includes a photocopy of part of the Grievance ignores District’s policy and is itself a violation of the Code of Ethics.<sup>17</sup>

5. May 25

The next communication is probably the point at which witnesses began to suspect that rudeness and aggression toward the District did not account for all of Williams’ behavior.

On the afternoon of May 25, Williams called Rosier at his office and harangued him for not arranging for her in-person attendance at the TASB Leadership Institute in San Antonio on June 16 through 19, even though it is beyond dispute that, on April 9, Williams expressly advised Rosier in writing that she would attend virtually.<sup>18</sup> Witnesses who overheard the call confirm that Williams yelled at Rosier over the phone, was abusive, “bullying,” “unprofessional,” and was “bitching at him” in “fighting words.” One witness admitted, “It, like, hurt my feelings for her to talk to him that way,” and questioned, “Who does she think she is to talk to him that way?” Another added, “She sounded very, in my opinion, hostile. She was yelling at Gary.”

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<sup>17</sup> Exhibits 1; Exhibit 19

<sup>18</sup> Exhibit 3 (Rosier C and D Attachment 1)

So that he would have witnesses to Williams' behavior, Rosier placed the call on speakerphone, and at least one witness has said that she first heard Williams shouting at Rosier through the walls of the building. That witness added that she has never heard a Board member speak to anyone like that and that she would resign if anyone spoke to her that way. One witness who corroborated Rosier's description of the May 25 call has admitted she is afraid Williams will retaliate against her if Williams learns that she has confirmed Rosier's account of how Williams behaved. Considering the way Williams has reacted to Rosier's Grievance, that fear of retaliation is valid.

Until May 25, it was likely that Rosier, drafting his Grievance in retrospect, may have read more into Williams' emails than she intended, at least to the extent of race and gender as the basis of his complaint. One witness to the May 25 call repeatedly said she does not believe Williams "would have spoken to Ms. [Jessilyn] Allen ("Allen")," who is African-American, "that way." When pressed, the witness suggested that Williams would have treated Allen differently because Allen and Williams are approximately the same age and Rosier younger. The age differential explanation stretches credulity under the circumstances, however, considering Rosier himself is middle aged and Williams not much older. Allen, meanwhile, admitted to having exchanged emails with Williams any number of times without incident.

Where the events of May 25 are concerned, somebody is telling the truth, and somebody is not. No interpretation of someone's tone in an email is at play here. Williams denies Rosier's description of the call, saying, "That didn't happen," and added, "I could tell he was performing in front of someone." She went on to say, "He was trying to egg me on so I could come at him. I wouldn't give him the satisfaction." Denying that she ever speaks to anyone loudly or harshly, Williams maintains, "I try to refrain from using my voice and my position to intimidate others."

All the other witnesses to the call could not disagree more. There is no credible reason to expect that no fewer than three witnesses, not counting Rosier, remembered vividly something that never happened.

Denying the behavior confirmed by others, Williams downplays Rosier's account of the phone call, saying "Gary is like one of those child[sic] who is seeking negative attention." It was Williams, rather, who gathered the attention of everyone within earshot that day, and everyone except her describes her behavior identically.

Seeing nothing wrong with her behavior and as though it justifies the way she acted, Williams contends that she and she alone was kept in the dark about the last-minute opportunity to attend the meeting in person and that all the other Board members had been notified that the FBISD had won a "lottery" allowing for in-person attendance. Williams defends her conduct during the May 25 phone call on the grounds that Rosier had treated her differently from the other board members and she was upset by what she saw as disrespectful treatment at the hands of an underling. The Investigation unearthed nothing to suggest that other board members had been given the chance to attend the Leadership Institute in person while Williams had not. The witnesses to the May 25 phone call corroborate Rosier's account of it, and none has any apparent bias against Williams. Rosier even patched in Board President Dave Rosenthal ("Rosenthal") to hear the call.

After the chewing he received over the phone, Rosier sought Dupre's advice and was told to register Williams for in-person attendance. Rosier did so, thinking it would placate Williams, only for Williams to tell him days later that she would not attend in person and to cancel her reservations.<sup>19</sup> In essence, Williams yelled at length at Rosier on the phone for not signing her up

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<sup>19</sup> Exhibit 3 (Rosier C and D Attachment 4)

to attend a meeting in person (1) after she had already told him to mark her down for virtual attendance and (2) then, after he changed her registration so she could attend in person, she canceled her registration.

The annoyances of online reservations for out-of-town trips hardly accounts for the unbridled aggression the witnesses describe. Quickness to blame and eagerness to find fault are the hallmarks of prejudice, and it is at this point that Williams' behavior shows more than a short fuse. Williams herself admits she is combative, but the behavior described by ear witnesses to the May 25 call is more than simply being feisty. The Investigation unearthed no evidence of Williams treating any other school personnel this way and no evidence of any other Board members ever treating anyone this way.

Considering the totality of the evidence and the abuse heaped on Rosier on this occasion, it is unreasonable to expect that Williams would have behaved like this if Rosier were not white or male, let alone both. In Rosier, as witnesses describe, Williams saw a white male in a subordinate role in a job she openly regarded as woman's work. "We live in a society," said Williams during the Investigation, "where men perform some jobs and women perform other jobs." Because Rosier played essentially a secretarial role, Williams admits that she thought he was gay. No person who indulges in a gender stereotype like that can claim his or her conduct is not shaped by gender perception. The greater weight and preponderance of the credible evidence supports a finding that race and gender were motivating factors in Williams' hostility toward Rosier, especially considering Williams' own admissions and the beliefs of witnesses who observed her behavior. Moreover, if Williams broke the Code of Ethics previously, she shattered it on May 25.<sup>20</sup>

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<sup>20</sup> Exhibit 19

6. May 27

Hard on the heels of the May 25 telephone outburst was the May 27 Board meeting and yet another accusation of failed communication.

On May 24 at 11:01 am, the day before the May 25 phone call, Rosier sent Williams a calendar invitation to the May 27 Board meeting that she said never arrived. The IT records at FBISD prove that Rosier sent the invitation to Williams' FBISD email address and Williams received *and deleted it*.<sup>21</sup> Rosier's invitation remains in Williams' folder of deleted items, as did the other invitations Rosier sent Williams in May.

During the Investigation, FBISD Chief Information Officer Long Pham ("Pham"), Rarish Patel ("Patel"), Jojo Jacob ("Jacob") and Mitzi Patin ("Patin") all looked at the email history in the FBISD system, and all confirmed, together at the same time, that Rosier sent Williams the invitation on May 24 and that the system shows it in Williams' folder of deleted items. According to those four FBISD IT personnel, there are two plausible explanations why an email lands in a "deleted" folder: (1) accepting the invitation, which then automatically deletes the email and places the invitation on the recipient's calendar and (2) deleting the invitation when it arrives, either deliberately or inadvertently. Pham was able to prove that Williams did not accept the invitation when she received it.<sup>22</sup> There is no credible evidence, as Williams contends, that Rosier failed to send the invitation or, after the fact, falsified the contents of emails to show that he had sent them. There is no credible evidence that anyone in the FBISD Administration or IT department conspired to paint Williams in a bad light to cover up for Rosier, then or now.

Depending on the features of the Microsoft application, not every depiction of an email on screen is identical, even if it is the same email sent to the same user. In some instances, time and

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<sup>21</sup> Exhibit 10

<sup>22</sup> Exhibit 16

date may not appear, for example, on both a desk top computer and a hand-held device. Not every version of Outlook shows the same information on the screen. Attachments do not appear on screen in the same place, depending on the recipient's device. When emails are printed, oftentimes certain information that appears on screen is missing from the printed page, as the IT personnel at FBISD ably demonstrated.

Not to be corrected by the Board's assistant, Williams resorted to Facebook, where she published copies of items Rosier had offered as his proof that he had, in fact, invited her to the meeting.<sup>23</sup> In that Facebook post, Williams publicly accuses Rosier of "manufacturing emails" based on the absence of date and time information on the face of the items Rosier had provided.<sup>24</sup> When confronted with evidence from the District's IT personnel that Rosier did nothing of the kind, Williams asserts, "I know when someone has degraded a document. I know when that document is no longer in its original form."

Ignoring Pham and his colleagues, Williams contends, "Because of the kind of server we have, with Outlook, you can always insert new emails." Rather than accept the IT personnel may know more about the District's electronic data system than she does, Williams has accused Pham and others in the District of perpetuating the fraud. Even after Sayavedra explained to Williams what the IT personnel had shared, Williams dismissed it saying that the emails the IT personnel had gathered were "inserted after the fact." Such a response hardly comports with the requirement in the Code of Ethics to be objective and well informed.<sup>25</sup>

Several glitches took place during the Investigation that may shed light on the electronic communications missteps that run throughout the Grievance. During her first interview, Williams

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<sup>23</sup> Exhibit 9

<sup>24</sup> Exhibit 9

<sup>25</sup> Exhibit 19

had no difficulty receiving the Webex invitation and willingly participated on camera without mishap. During her second interview, Williams received the invitation, appeared on time and gave an interview, just as before. But she did not appear on camera—at all. The room she was sitting in, or rather the ceiling of the room, was squarely in the line of sight, but even after several attempts to locate herself with the lens, Williams could do no better than sit for the interview with the camera aimed skyward at nothing in particular. Eventually the interview proceeded by audio only. Considering that electronic communication failures account for most episodes in the Grievance, it is reasonable to question whether Williams has the skills to navigate the computer well enough to know when she has received emails or what to do with them consistently.

In addition to the December 14 email exchange with Rodriguez that Williams wanted to include among the exhibits but never sent, Williams attempted to forward copies of Facebook posts during the Investigation but sent instead an email with none of the referenced attachments included.<sup>26</sup> There is no evidence suggesting that Williams attempted to deceive anyone by failing to forward those items. Rather, the omissions suggest that Williams may be not be particularly adept at high tech, a possibility that she never appears to consider. As adamant as she is that she is right and others at FBISD are wrong and that many of them have been wrong about a host of things for years, it is no wonder she never considered that the fault for many of the communications errors may not lie with others but with herself. Often wrong but never in doubt is no way to honor the Code requirement to “listen with an open mind to others’ ideas” and to be informed.<sup>27</sup>

Had Williams chosen, she could have seen for herself on the FBISD computer records that Rosier’s May 24 invitation appears in her “deleted” folder. Instead, Williams went to the public media to accuse Rosier of dishonesty and of conspiring “with other employees and Public

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<sup>26</sup> Exhibit 15

<sup>27</sup> Exhibit 19



Officials” to deny her “access to a Public and Closed door meeting.”<sup>28</sup> There is no credible evidence that Rosier did anything of the kind, nor is there evidence of others doing so. Publicly questioning why Rosier was still employed is a poorly veiled demand that he not be. Williams’ warning that her reaction would appear in “phases” was a harbinger of things to come, including her demand to Sayavedra of June 2.

7. June 2

Williams demanded on this date that Rosier no longer handle any school business related to her or her “seat” on the Board.<sup>29</sup>

After what can be fairly described as throwing a fit over hotel reservations on May 25, Williams sent Rosier, Rosenthal and Sayavedra an email at 2:52 pm on June 2 saying, “Please cancel the reservation for me to attend the San Antonio trip. Today is the last day to avoid any financial penalty.”<sup>30</sup> At 3:11 Rosier confirmed that he had done so.<sup>31</sup>

The day prior, Rosier had sent Williams an email alerting her that, later that day, an FBISD officer would deliver a packet to her containing her graduation parking pass and information on a conference in New Mexico.<sup>32</sup> On June 2, Williams sent an email to new fellow Board members referring to at least some of what Rosier had said would be delivered, saying, “I DID NOT receive any such paperwork. As I have attempted to shield both you and Judy from the utter sewage that is the Administration and a few trustees. COMPLETE AND UTTER TRASH!!!!!!”<sup>33</sup>

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<sup>28</sup> Exhibit 3 (Rosier Hostile Attachment 1)

<sup>29</sup> Exhibit 3 (Rosier C and D Attachment 6)

<sup>30</sup> Exhibit 3 (Rosier C and D Attachment 4)

<sup>31</sup> Exhibit 3 (Rosier C and D Attachment 5)

<sup>32</sup> Exhibit 3 (Rosier Hostile Attachment 6)

<sup>33</sup> Exhibits 3 (Rosier Hostile Attachment 5); Exhibit 13

The June 1 delivery episode and Williams' June 2 email warrant two responses:

1. Whatever happened after it arrived at Williams' residence, Officer Villoutreix made the June 1 delivery and videotaped himself in the process;<sup>34</sup> and
2. Williams' email to the two new Board members is an indefensible embarrassment to the District and a flagrant violation of the Board's Code of Ethics.

At 2:57 pm on June 2, an hour and half before the "sewage and trash" email, Williams sent Rosier an email, copying Dupre, Sayavedra and Rosenthal, saying of the June 1 packet delivery, "BTW . . . This information did NOT arrive on [sic] yesterday. . . I will await that explanation as well."<sup>35</sup> The packet did arrive, however, as Officer Villoutreix's bodycam footage proves beyond a doubt. Williams' outburst was not only beyond the bounds of decency, it was based on a verifiable untruth.

Name calling like "utter sewage" and "COMPLETE AND UTTER TRASH" has no place in civilized discourse, let alone penned by a school Board member referring to her colleagues. One of three things is true: either Williams lacks any self-awareness, she deliberately disregarded any sense of decency, as the Code of Ethics requires and she swore to when she took office, or she does not know or care what "civility," "decorum" and "respect" mean.<sup>36</sup> Apparently seeing nothing at all wrong with such behavior, Williams defends herself by claiming she was not referring to Rosier, as though describing someone else this way to fellow Board members would be acceptable so long as Rosier was not the target.<sup>37</sup>

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<sup>34</sup> A copy of Villoutreix's bodycam footage is included in the record but is not listed as a numbered exhibit.

<sup>35</sup> Exhibit 3 (Rosier Hostile Attachment 6)

<sup>36</sup> Exhibit 19

<sup>37</sup> Exhibit 11; Exhibit 13; Exhibit 14

Her reprehensible manners notwithstanding, Williams may have a point, although not one that shows her in a favorable light. In her defense, Williams is quick to point out that Rosier was not part of the Administration, nor was he a Board member. Williams' description of anyone as "utter sewage" and "complete and utter trash" does nothing to reflect well on her, however, and she mounts a poor defense by exclaiming she was talking about her colleagues on the Board and the school Administration. That said, Williams' explanation is at least consistent with her regard for Rosier as a mere functionary and is consistent as well with the enmity she has shown the Administration for years.

Exactly two minutes later, Williams instructed Sayavedra as follows:

"Dr. Sayavedra,

Per our conversation last week, Gary SHOULD NOT handle any business relating to me and MY SEAT. Such MUST be effective immediately."<sup>38</sup>

In other words, within a week of calling Rosier and yelling so loudly the neighbors could hear, Williams demanded to Sayavedra that Rosier's responsibilities be modified to suit her. Two minutes after the "trash" and "sewage" email Williams turned back to Rosier once again, this time to squeeze his job duties. Her explanation that she was not referring to Rosier as "utter sewage" and "complete and utter trash" may be literally true, but he was nonetheless her target 120 seconds later.

Claiming she had lost faith in Rosier, Williams insinuates that she made the June 2 demand to Sayavedra because Rosier had been responsible for copying the administrative assistant to Jim Rice ("Rice") on closed session meeting invitations, irrespective of whether Rice had requested it. Something prompted Williams to make this demand to Sayavedra, but if it were solely Williams'

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<sup>38</sup> Exhibit 3 (Rosier C and D Attachment 6)

concern that Rosier had sent invitations to closed session meetings to a Board member's assistant, then it does not stand to reason that Williams would have demanded that Rosier's role be curtailed only as to her. The disconnect between what Williams suggests she was upset about and the remedy she demanded is hard to miss.

At or near the same time Williams demanded that Rosier no longer "handle any business" related to her seat on the Board, Sayavedra instructed Rosier to route Board communications through two channels, one directly to six of the seven board members and one to Williams through Sayavedra herself.<sup>39</sup> Rosier characterizes this arrangement as punitive in nature and maintains that it added layers of complexity to the process, was more time consuming, and shrank the scope of his job while making it harder. Whether Rosier perceives and Williams intended the modification as an insult to him, Sayavedra's decision to separate an alleged perpetrator from her victim likely comports with best practices in human resources and was probably wise under the circumstances. Moreover, Sayavedra maintains she had begun considering such a move after the May 27 incident and, given what she knew about the dynamics at play, would have given Rosier such a directive even if Williams had not demanded it. Rosier does not see it that way. As protective as Sayavedra's intentions may have been, and even if they were arguably not prompted by Williams' demand, Rosier believes Sayavedra's "cease and desist" order effectively handcuffed him at his job, just as Williams wanted.

It is unclear at which point along the continuum witnesses at FBISD began to suspect that Williams' treatment of Rosier went beyond uncouth manners, inveterate aggression and raw disdain for the Administration and fellow Board members, but by the week spanning May 25 to June 2, Williams was clearly targeting Rosier in a manner unprecedented at the District. Personnel

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<sup>39</sup> Exhibit 6

at FBISD at a loss to explain Williams' behavior have concluded that race and gender were relevant to their understanding of Williams' motives.

## 8. Retaliation

At 6:43 pm on August 2, Williams wrote the Board and a host of administrators, saying,

“Greetings,

I am needing to know by 7:00 tonight as to what is going to be DONE about the falsification of the emails and this nonsensical complaint by Garrett Rosier. 7:01 will be too late.” (all caps in the original).<sup>40</sup>

In other words, Williams gave the Board and the Administration 17 minutes to advise her what would be “DONE” about the Grievance, as though Rosier had no right to file it and the Board no obligation to investigate, with the admonition that 18 minutes would be too long. With Rosier's job duties already curtailed, Williams' email of August 2 is tantamount to a demand that the Grievance be tossed and the Investigation refocused, effectively robbing Rosier of the right to seek redress for the wrongdoing he perceived. During the Investigation, demanding even more bluntly, Williams admonished, “End this shit show, like now.” Insisting that the Grievance be dismissed is not an instance of Williams defending herself; it is retaliation against Rosier for accusing her of wrongdoing.

DIA (Local) states “Retaliation against anyone involved in the complaint process is a violation of District policy and is prohibited.”<sup>41</sup> DIA (Local) lists “coercion” as a specific example of prohibited retaliation.<sup>42</sup> In her August 2 email to the entirety of the Board, Williams attempted to coerce the Board into short-circuiting the Grievance process and ruling against Rosier.

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<sup>40</sup> Exhibit 17

<sup>41</sup> Exhibit 2

<sup>42</sup> Exhibit 2

Williams was a cooperative witness during the Investigation and made herself available for more than one interview. In the main, she was polite, patient and seemingly willing to speak freely. Some, though not all, of her explanations are credible. But by August 2, she wanted the Grievance to go away. The ultimatum “7:01 will be too late” is a not-so-thinly-veiled version of “or else.” Filing a complaint is a matter of right the District recognizes, and Williams’ email to the Board of August 2 constitutes an adverse employment action calculated to discourage Rosier from participating in a protected activity.<sup>43</sup> It is also a breach of the Code of Ethics inasmuch as it violates District policy.<sup>44</sup>

9. Jim Rice

There is no credible evidence that Rice played a role in Rosier’s decision to file a grievance, nor is there credible evidence that Rice helped prepare the Grievance, provided its content or urged Rosier to file it. In fact, it is likely Rice did not know there was a Grievance until it was already on file, and there is no credible evidence that Rosier and Rice spoke about the Grievance beforehand.

Williams is admittedly upset that Rice allowed his assistant to receive Zoom invitations in order to calendar the meetings for him. Beyond that, she counts Rice among those in league against her, going back to when she was elected. Whether Rice acted improperly in using his assistant to keep his calendar in a way that allowed her to receive closed session invitations is beyond the scope of this Investigation. Whether Williams’ insistence that Rice behaved improperly led her to question if Rice was behind the Grievance being filed remains unknown. There is no evidence, meanwhile, that Rice and Rosier conspired to blame Williams of wrongdoing.

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<sup>43</sup> Exhibit 1

<sup>44</sup> Exhibit 19; Exhibit 1; Exhibit 2

## CONCLUSION

According to Rosier, the substance of the Grievance was not news to the Superintendent, Acting Superintendent and Board President at the time he filed it.<sup>45</sup> Rosier claims that he had complained about Williams to Dupre and Rosenthal months before, and Sayavedra was aware of at least some of the basis of Rosier's contentions by late May. Dupre apparently told him that nothing could be done, aside from transferring Rosier to another job, even if his complaints were justified. Whether there is any such thing as a right without a remedy is beyond the scope of this Investigation and calls for legal analysis. But the fact that Dupre purportedly said that to Rosier is within the scope and forms a part of Rosier's experience.

Regarding the specific allegations of race and gender-based mistreatment, the Investigation relied heavily on the contributions of persons with knowledge of relevant facts. Persons employed by the District drew their conclusions about the way Williams treated Rosier based on their own personal experience and observations.

Williams' failure to honor the Board's Code of Ethics is apparent throughout and relies in part on what the witnesses have described and in part on the literal wording of emails and the Code. It does not take a witness to establish that referring to fellow Board members and the Administration as "utter sewage and "COMPLETE AND UTTER TRASH" violates the requirement to conduct oneself "with civility and decorum" or to be "fair, just, impartial and objective."<sup>46</sup> Disclosing the contents of the Grievance on Facebook violates the confidentiality provision of DIA (Local) and the Code of Ethics requiring adherence to District policies.<sup>47</sup> DIA (Local) specifically identifies" coercion" and "intimidation" as examples of retaliation, all of

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<sup>45</sup> Exhibit 21

<sup>46</sup> Exhibit 19

<sup>47</sup> Exhibits 1; Exhibit 19

which appear in Williams' email to fellow Board members demanding that the Grievance be stopped.<sup>48</sup>

The Code of Ethics requires Board members to tell the truth.<sup>49</sup> Williams' descriptions and accounts of the May 25 telephone call cannot be reconciled with those of every other witness to it, whose description and accounts perfectly mirror one another. Unlike Williams, the witnesses to the call other than Rosier have no stake in how they describe what happened.

Williams' willful disregard for the explanations of Pham and the IT staff and her accusation of their co-conspiracy with the Administration and other Board members show more than a misguided faith in one's own knowledge of computer systems. They are consistent with a pattern of hostility toward anyone Williams sees as an insider in the District's establishment. Williams believes those in league against her include Dupre, Rosenthal, Rice and Rose-Gilliam, whom Williams refers to as "Shirley Rose." "These people have been stabbing me in my back from day one," Williams claims, adding, "they," speaking of Rosier, "gave him the go-ahead" to file his Grievance.

In part, Williams believes the conspirators resent her presence on the Board and want her gone. When asked "What is at the bottom of this?" Williams answered, "I won. That's it. I won." The conspirators, she believes, wish she had not. Dismissing Rosier's claims outright, she says, "He was campaigning to be a part of this shit show, and now he's about to star in it." Williams not only came to the Board antagonistic but has remained so throughout and vows to widen the conflict if the Grievance is not jettisoned. Judging by the things she has done and said so far, that is not an idle threat.

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<sup>48</sup> Exhibit 1

<sup>49</sup> Exhibit 19



In some instances, witnesses observed Williams' behavior during closed Board meetings but disclosed none of what happened there. The Investigation avoided inquiring into closed session meetings, and it remains an open question whether individuals who attended those closed sessions may have knowledge of relevant facts the Investigation did not reach.

Rosier probably did his best to keep Williams apprised of school business using the means at his disposal. Rosier did not perform flawlessly on every occasion, but there is no evidence he treated Williams differently from the other Board members, and whether he made similar errors involving other Board members remains unknown. Whatever the case, there is no evidence that anyone else, on the Board or otherwise, has treated anyone at the District the way Williams treated Rosier.

Communicating with Williams, by whatever means, was fraught with difficulty. Hand deliveries failed even though officers took the packets to the right house. Emails failed even though the District's IT records show that Rosier sent them to Williams, just as he described. The greater weight and preponderance of the credible evidence shows Rosier more than competent for the task and Williams increasingly cruel in her treatment of him. Witnesses caught between Williams and Rosier who had the opportunity to observe them both found her behavior reprehensible, and more than one attributed it to race and gender.

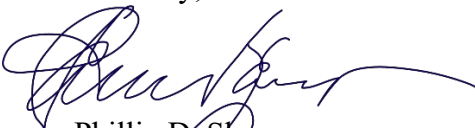
The greater weight and preponderance of the credible evidence shows Williams treated Rosier abusively in part because he is white and in part because he is a man who worked as an administrative assistant whom Williams believed she could treat as she pleased. DIA (Local) specifically identifies "gender stereotypes" as an example of prohibited discrimination, and Williams herself leaves little doubt she indulged in a stereotype concerning Rosier that violated

the policy.<sup>50</sup> The greater weight and preponderance of the credible evidence also shows that Williams came to see Rosier as an extension of an Administration with whom she had been at war for years and an easy target for her attacks. Williams has defended herself by claiming that she does not “punch down,” meaning at subordinates. The record shows otherwise.

There is no credible evidence showing that FBISD personnel created fraudulent evidence to help defend Rosier and created no false email records to substantiate his claims. There is no credible evidence that Rosier altered emails after the fact to show that he had sent them. There is no credible evidence establishing that any of the FBISD personnel participated in a plan or scheme to alter, delete, amend or falsify records.

To conclude that the Grievance lacks merit is to ignore witnesses with no stake of their own in the outcome. To conclude that Williams behaved properly is to ignore the overwhelming evidence against her, including her own words and admissions.

Sincerely,



Phillip D. Sharp

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<sup>50</sup> Exhibit 1

### List of Exhibits

No.	Rec'd From	Date	Description
1.	FBISD		DIA (Local)
2.	FBISD		DGBA (Local)
3.	FBISD	06/21/2021	Employee Grievance Form – Rosier against Williams with all attachments
4.	Rosier	09/09/2020	Text from Rosier to Williams re address
5.	Rosier		Transcript of Williams voicemail to Rosier re address
6.	Rosier		Report of Telephone call with Act Sup Sayavedra's directive (also attached to grievance)
7.	Rosier	07/13/2021	Email from Rosier fwd documents following 7/13/21 meeting
8.	Rosier	07/30/2021 – 08/02/2021	Email string (1) Rosier to FBISD & Sharp re Williams posting parts of grievance to Facebook; and (2) Scamardo's response.
9.	Rosier	07/20/2021	Email from Rosier to Sharp forwarding screenshots of texts to Dupre and Williams' postings to Facebook following 7/19/21 meeting
10.	Williams	07/17/2021	Email from Sayavedra to Williams regarding Screenshots of Emailed Invitations [with memo attached from Pham]
11.	Williams	07/18/2021	Email from Williams to Sayavedra refuting evidence of emailed invitations and accusing "UTTER CORRUPTNESS at the highest level."
12.	Williams	04/05/2021	Email string from Williams (1) asking Rosier about CE classes with Rosier response; and (2) asking about meeting "today" and response from Heyliger stating there was not meeting.  Williams opens the forwarding portion to Sharp (sent 8/2/21) by stating that Garret was not the "HIS" I referenced."

No.	Rec'd From	Date	Description
13.	Williams	05/28/2021 – 06/06/2021	Email string (1) Dupre sending out Daily Update including Commencement plans where Heyliger, Rosenthal or Grayle will preside over graduation; (2) Williams' accusation of "former Trustee Antics"; Williams to Malone; and 210802 email to Sharp stating it is an example of "Administration is complete and utter trash."
14.	Williams	06/02/2021	Email string regarding graduation robes for Trustees, Malone's acknowledgement of receiving the paperwork re same and Williams' response that she had not received "any such paperwork" and stating that she was trying to "shield both you and Judy from the utter sewage that is the Administration and a few Trustees. COMPLETE AND UTTER TRASH!!!!!!!!!"
15.	Williams	06/05/2021 – 06/09/2021	Email string (1) Williams asking Sayavedra for copies of ALL emails sent by Rosier re 5/27/21 workshop and all emails from Williams to Rosier re same; (2) Sayavedra forwarding requested emails; and (3) 210802 email with Williams purporting to forward "Clear copies of the (fabricated) emails I uploaded to my facebook page."  to Sharp (no attachments).
16.	FBISD	06/16/2021	Memo to Diana Sayavedra from Long Pham re May 27, 2021 Board Meeting Invites
17.	Rosier	08/02/2021 - 08/03/2021	Email string (1) Sayavedra fwd Daily Update; (2) Williams stating "I am needing to know by 7:00 tonight as to what is going to be DONE about the falsification of the emails and this nonsensical complaint filed by Garrett Rosier. 7:01 will be too late."; and (3) Rosier resignation.
18.	Williams	08/10/2021	Williams email to Morris, Scamardo, Rosenthal and Sharp re Bid Fixing: "It appears to be a criminal conspiracy .Therefore, I will approach the situation as such."
19.	FBISD	06/06/2014	Board of Trustees Code of Ethics
20.	Rosier		List of Denetta Williams Facebook pages

<b>No.</b>	<b>Rec'd From</b>	<b>Date</b>	<b>Description</b>
21.	Rosier	05/28/2021	Rosier text to Dupre re Williams' creation of a hostile work environment
22.	Rosier	06/17/2021	Text either to or from Heyliger "On my way to you from Grayle's house." Last time he spoke to Heyliger
23.	Rosier	07/10/2021	Screen shot of Williams Facebook post to re Rosier "handles our calendar"
24.	Rosier	07/10/2021	Screen shot of Williams Facebook post to Rick Garcia re "slew of bad acts"
25.	Rosier	07/18/2021	Screen shot of Williams Facebook post to Rick Garcia re investigations (clearly putting Phil Sharp's name out to the public)