

SCHOOL BOARD OF BREVARD
COUNTY, FLORIDA, BY AND
THROUGH ITS SUPERINTENDENT,
DESMOND K. BLACKBURN, Ph.D.

Petitioner,

vs.

KAREN WILLIAMS,

Respondent.

ADMINISTRATIVE COMPLAINT

DESMOND K. BLACKBURN, as Superintendent of Schools, for and on behalf of the School Board of Brevard County, Florida (hereinafter "Petitioner"), files this Administrative Complaint against KAREN WILLIAMS (hereinafter "Respondent").

Petitioner seeks the termination of Respondent's employment and the cancellation of her Professional Service Contract pursuant to Section 1012.33(6)(a), Florida Statutes.

The Petitioner alleges:

1. Respondent, at all times material to this Complaint, was employed as a classroom teacher by the Petitioner, the School Board of Brevard County, Florida, at Columbia Elementary School.

2. Respondent holds a Professional Service Contract of Employment with Petitioner.

3. On December 4, 2015, Respondent engaged in conduct with a student that violated the Principles Of Professional Conduct Of The Education Profession For Florida, as adopted in Rule 6B-1.006, FAC, that compromised her effectness and integrity as a teacher.

4. On December 4, 2015, Respondent bit a special needs student in her class at Columbia Elementary School causing actual personal injury to the student.

5. On January 27, 2017, Respondent was adjudicated guilty of the crime of culpable negligence inflicting injury in violation of Section 784.05(2), Florida Statutes, a misdemeanor of the first degree, for biting the special needs student. Respondent demonstrated an utter disregard for the safety of the student and indifference to the consequences of her actions.

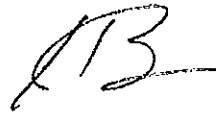
6. Respondent's actions in biting the special needs student subjected the student to conditions harmful to the student's physical health and safety in violation of State Board of Education Rule 6B-1.006(2)(a), FAC, and the Standards of Ethical Conduct adopted by the School Board of Brevard County in School Board Policy 3200 Section A1.

7. Respondent's actions constitute misconduct in office, gross insubordination and willful neglect of duty and just cause to terminate Respondent's employment and cancel her Professional Service Contract under Section 1012.33(6)(a), Florida Statutes.

WHEREFORE, the Superintendent of Schools for the School Board of Brevard County, Florida, recommends that the Board terminate Respondent's employment and cancel her Professional Service Contract.

Dated this 1 day of March, 2017.

Respectfully submitted,



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