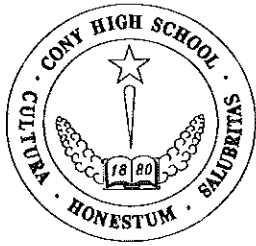


EXHIBIT A



Cony School
60 Pierce Dr.
Augusta, Maine 04330
Telephone (207) 626-2460
Fax (207) 626-2541

Principal
Assistant Principals
SPED Director
Asst. SPED Director

Memorandum

To: Toni Richardson
From: [REDACTED], Assistant Special Education Director
Date: 9/19/16
Re: Staff Relationships

This is a coaching memorandum pursuant to your professional responsibilities in the areas of Staff relationships.

On September 15, 2016 I met with you and your teaching team; [REDACTED], Special Education Teacher, [REDACTED], Educational Technician, and [REDACTED], Educational Technician, due to concerns that were expressed by your supervising teacher, Mrs. [REDACTED] and your interactions with Mr. [REDACTED]. During that meeting, I expressed my expectation that you were all a "Team" which needed to work respectfully to the mutual goal of student success.

On September 16, 2016 you met with [REDACTED], Special Education Director and me. You stated that you "did not feel comfortable working with Mr. [REDACTED]", noting that statements he has made in the classroom were "challenging / almost aggressive in the way they were delivered". You cited an instance where "he stood over you, pointed and used an aggressive tone". In regards to Mr. [REDACTED]'s dissatisfaction with programming procedures and the manner in which he expressed his displeasure, you noted that these are areas of stress and discomfort for you.

An investigation of your concerns indicated that you may have imposed some strong religious/spiritual belief system towards Mr. [REDACTED]. Stating, "I will pray for you", and "you were in my prayers" is not acceptable - even if that other person attends the same church as you.

In the case of, Everson v. Board of Education, the Supreme Court applied the "establishment clause" of the First Amendment to the states. In the context of the "separation of church and state," this case prohibits public school-sponsored religious expression. Therefore, in the future, it is imperative you do not use phrases that integrate public and private belief systems when in the public schools.

Going forward, I expect when you disagree with a staff member, you will address it in a discrete and professional manner with no reference to your spiritual or religious beliefs.

This coaching memorandum is not considered disciplinary in nature and will not be included in your personnel file. If you have any additional interactions that are deemed unprofessional by administration, you will be subject to disciplinary action and/or possibly dismissal.

If you have any questions regarding this coaching memo, please do not hesitate to contact me.