



To: Members of the Board of Education, Columbus City Schools
Cc: James Barnes, Esq., Columbus City Schools General Counsel
From: Jessica Philemond, Esq., Scott Scriven LLP
Re: Investigation of Complaint Against Board Member Simmons
Date: June 4, 2024

At the direction of Board President Christina Vera, I was asked to investigate a complaint against Board Member Simmons made by the Columbus Education Association and Columbus Education Justice Coalition on May 21, 2024, in which demands were made of the Board of Education and Board Member Simmons and “legal action” was threatened. (See “An Open Letter to Columbus City Schools Board of Education Members,” Exhibit 1, hereinafter referred to as “The Complaint.”). At issue in The Complaint was a document titled “Taking Control of the Task Force Narrative,” dated May 10, 2024, that Board Member Simmons presented at a meeting on May 10, 2024. (Exhibit 2, hereinafter referred to as the “Simmons Document.”) As a part of this investigation, I was asked to determine whether Board Member Simmons alone authored the Simmons Document, and, if not, whether any authors were members of the Board of Education or administration. It is important to note that the investigation thus far has been limited to internal witness interviews and related documents.

Overview of the Investigation

As a part of the investigation, I interviewed all seven (7) members of the Board. All but one board member (Board Member Brandon Simmons) cooperated fully and provided documents as requested. Board Member Simmons was not cooperative. He refused to provide a complete interview and answered almost no substantive questions, discussed in further detail below. With regard to documents, Board Member Simmons was asked to produce all related public records in his possession but refused to do so prior to the Board’s motion to file legal action. After that time, Board Member Simmons provided limited records but continued to refuse to produce public records that would be of significant relevance to this investigation. In addition, it appears that Board Member Simmons has destroyed (or attempted to destroy) relevant evidence and possibly given other evidence to another individual or individuals to maintain. Further details regarding these requests are discussed later.

In addition to board members, I interviewed several members of the administration and staff, including the District Superintendent, the Superintendent's Chief of Staff, members of the District Communications Team, Board Services Team, and others present at events relevant to the investigation.

Summary of the Initiating Concern

On May 10, 2024, a briefing meeting was held at the Columbus City Schools administrative offices for the sole purpose of providing an update regarding Task Force communications and engagement. After the Superintendent and Chief Communications Officer provided an update, Board Services discussed the Board of Education Engagement Plan they had prepared. After they were done, Board Member Simmons asked to share his ideas and passed out a document dated May 10, 2024 titled "Taking Control of the Task Force Narrative." (The Simmons Document, Exhibit 2). While Simmons collected some copies of the document several days later, not all were retrieved. The Simmons Document was then distributed by Board Member Ingles on May 17, 2024, given to union leadership and others that day, and then later distributed to media, eventually being published in media articles on May 21, 2024.

At the already-scheduled board meeting on May 21, 2024, Board Member Simmons left twice to make statements to the press, once before the meeting and once during the meeting. In those statements, he said that the Simmons Document was a collaboration of multiple people from multiple meetings and from multiple sources, including key stakeholders. He also said that there were various versions (earlier and later) and that he wanted to emphasize how sorry "we are" that the document was seen by folks and that "it certainly was not the Board President's intention when they saw the first version – I don't think it was the Superintendent's intention when they saw the first version." (See Exhibit 3, link to video and transcript of Board Member Simmons' statements on May 21, 2024). Those comments raised questions regarding who actually wrote the Simmons Document or its various versions.

Limitation of Report – Witness Cooperation

As mentioned above, all witnesses were cooperative in the investigation except for Board Member Simmons. I spoke with Simmons on May 22 and 23, and then again on May 30, 2024. Simmons was asked questions related to the press statements he made on May 21, 2024, including who was involved in the collaboration he was claiming and whether any of them were board members or district staff. His answer to all of those questions was, "I don't want to answer this question." Simmons ignored multiple requests to produce the public records in his possession. It was not until the Board's action on May 29, 2024, instructing legal counsel to initiate legal action against Simmons if he failed to provide records, that Simmons agreed to meet at the District administrative offices to produce records. At that meeting on May 30, 2024, Simmons provided select documents

only. Simmons described many records as “being no longer in [his] possession,” and said, “I don’t have an obligation to create records,” suggesting that his legal obligations went away with the records.

Explained below, Simmons created the Simmons Document on his personal Google Drive and, when asked to produce the Google Document, he admitted to deleting it. Board Member Simmons was given instructions to recover the Google Document and was offered assistance, but he has still not produced the Google Document. Obviously, if Board Member Simmons’ claim that many individuals collaborated in drafting the document is true, the Google Document and its corresponding data would be highly relevant to this investigation.

Findings of Fact

At the Board of Education’s May 7, 2024 meeting, recommendations were made by the Superintendent’s Community Facilities Task Force (“Task Force”) regarding recommended school buildings for closure. The District’s communications team was assigned the responsibility of communicating on these recommendations throughout the community and establishing opportunities for community engagement and feedback. Several board members expressed dissatisfaction with the initial roll out of communications on May 7th and so Superintendent Dr. Angela Chapman scheduled a meeting with the communications team for the morning of May 10, 2024, for the purpose of discussing Task Force communications and opportunities for community feedback and engagement throughout the month of May. Dr. Chapman also scheduled a second meeting for that afternoon to update a few members of the Board with her team.

The investigation found that, while the administration was preparing its communications and engagement plans, Board Member Simmons was sharing his opinions on Task Force communications as well. Board Member Simmons sent the following texts to Board Member Pierce on May 9, 2024 at 10:17 am, one after the other, as follows:¹

“We need to fight back against the misinformation from CEA. They are taking us down the same road as the strike.”

“Every false truth needs to be corrected at the next Board meeting.

*Play the video of the lie

*Play the video of the truth.”

“We need testimonials from all task force members and everyone who sits at that table to speak in support of the effort.”

¹ Before this text, the next most recent communications between the two was on May 8, 2024 and had to do with an unrelated matter.

Board Member Pierce responded with this text: “??? What happened”

Board Member Simmons then responded “Tuesday. We have to start fighting back. Just taking it is not going to work” and Pierce responded “Yes.”

Simmons then texted once more:

“It’s their strike strategy. Misinform, accuse of wrong doing, destroy the process so it can’t produce any outcomes.”

Dr. Pierce did not respond. (See Text Communication, Exhibit 5). Within minutes of his texts to Dr. Pierce, Board Member Simmons also sent an audio message to Board President Vera, expressing frustration with misinformation being spread, wanting to fact-check that misinformation from the CEA, and explaining his feeling that the Board needed to be laser-focused on the Task Force work.² Board President Vera responded “I 100% agree.” (Text Communications, Exhibit 4). When asked about this exchange and what Board President Vera thought Board Member Simmons meant when he referenced misinformation from the CEA, she explained that weeks prior there had been misinformation spread claiming that the District had never mentioned school building closures before passing the levy. She explained that this was not true; the Board’s Statement of Facts Resolution adopted in public session on September 19, 2023 stated in the General Funds Assumptions “[c]onsolidation of buildings to reduce overall building cost.” (Statement of Facts, slide 17, Exhibit 12).

On the evening of May 9, 2024, Board Member Simmons called Board Member Cole. Board Member Simmons complained about the CEA and said “we need to get back at them.” He shared other ideas that Board Member Cole did not agree with, such as attempting to cause a rift between the unions. Board Member Cole told Board Member Simmons to calm down, that there was no need to engage in a “clap back,” and said that at the end of the day, the Board makes the final decision on the Task Force recommendations. On the same evening, May 9, 2024, a student recognition ceremony was held at The Ohio State University. Board President Vera was asked to speak at the ceremony, and Dr. Chapman attended with her. At 5:29 pm, Board Member Simmons sent a text to Board President Vera that said “I wrote a communications plan, I would like you to look at tonight after event. Please.” She responded “Sounds good.” (Text Communications, Exhibit 4). After the ceremony ended, Board Member Simmons approach Board President Vera and Superintendent Dr. Chapman as they were leaving. The three of them sat down in the seating area in the lobby area outside of the ceremony at Ohio State. Simmons had a notebook that he opened with papers inside with typewriting and hand-written notes on them, but he did not share them with Dr. Chapman

² The transcript of the audio found in Exhibit 4 was auto-generated by Board Member Simmons’ phone and he has stated the transcript contains some word inaccuracies.

or Board President Vera.³ Simmons told them that he felt that the District was not communicating its vision of the Task Force very well; saying “we can’t be out-communicated.” Simmons then began complaining about the Columbus Education Association (CEA) and specifically said that he “wanted to go to war with John Coneglio,” the CEA President. Vera said, “we are not interested in going to war with the union” and Simmons said, “they are already starting with us.” Before they left, Simmons handed Dr. Chapman a copy of a document dated May 9, 2024, with the title “Taking Control of the Task Force Narrative.” (Exhibit 6). They did not review the document at that time, but Dr. Chapman took it with her as they left. Because Simmons was interested in Task Force communications, Dr. Chapman offered to brief him and Board President Vera the following afternoon at the administrative offices. Board President Vera invited Board Member Adair to attend as well, and she accepted. After the meeting, Board President Vera sent Board Member Simmons a text thanking him for offering his ideas and for working on an outline. When asked about this communication, Board President Vera explained that when they met she saw that Board Member Simmons had a hand-written outline of ideas inside of his portfolio. Board Member Simmons wrote back “I will have more things added to it tomorrow.” (Exhibit 4).

Dr. Chapman left Ohio State feeling disappointed in Simmons’ suggestion that he wanted to “go to war” with CEA. She explained that no one on her team had voiced that type of adversarial or confrontational language, and she felt that if Board Member Simmons had his way, they would be paying for it for years to come. She worried that Simmons was going to dismantle the hard work and efforts she had made since taking on the role of Superintendent.

Although Board Member Simmons was uncooperative in this investigation, he answered some limited questions on May 22 and 23, 2024 in phone calls. With regard to the conversation on May 9th at Ohio State, Simmons confirmed that Vera and Chapman both expressed that they were not interested in fighting with the Union. Simmons also said “all 3 people sitting down on the 9th agreed with that sentiment,” apparently including himself, which does not align with the Simmons Document he passed out the following day suggesting “fighting,” “hitting back” and refusing to reach any resolutions with CEA leadership for the remainder of the year, among other tactics. (Exhibit 2).

When Dr. Chapman arrived at her office on May 10, 2024, she gave her assistant a copy of the document Board Member Simmons had handed her the night before. Dr. Chapman asked her to scan it and send it to the staff who would be in their meeting with the three board members at 3:30 pm that day, and she did. (See Exhibits 6 and 7). The Task Force communications update then took place at 3:30 pm that day at the administrative offices as planned. Those present were Christina Vera, Jennifer Adair,

³ Board Member Simmons stated that this record is no longer in his possession.

Brandon Simmons, Angela Chapman, Lydia Wiggins, Letrece Griffin, Tyler Carter, Jacqueline Bryant, Elizabeth Hess, Carl Williams, and Amy Dawson (Fahlgren).

As everyone arrived for the meeting, Board Member Simmons asked Carl Williams, Board Clerk, to make copies of a document for him. Simmons sent Mr. Williams a link to his personal Google Drive at 3:31 pm, with the subject line “print please.” (Exhibit 8). Mr. Williams then made enough copies for everyone at the meeting and gave them to Board Member Simmons. Board Member Adair was seated next to Dr. Chapman and saw that Dr. Chapman had with her at the table a document that said “May 9th” at the top and the heading “Taking Control of the Task Force Narrative.” (Exhibit 6). Adair heard Simmons say to Dr. Chapman when he arrived “I revised the document” before he asked Carl Williams to make copies.

Superintendent Dr. Chapman and Letrece Griffin, Chief Communications & Engagement Officer, opened the meeting with an update to the board members on what the communications team would be doing moving forward – they discussed the gallery walk, the imagery, the community engagement, interviews, etc. The conversation then moved to Board Services and a discussion about how the Board could be more involved in the Task Force communications process. Lydia Wiggins and Beth Hess presented the Board of Education Engagement Plan and discussed the several different “Scenarios” of engagement for board members to choose. This Board of Education Engagement Plan was printed out for everyone in the meeting and it was also sent to the three board members in attendance. (See Document Share and Board of Education Engagement Plan, Exhibit 13).

The group discussed whether the location of the next board meeting (on May 21, 2024) should be moved from Hilltonia Middle School to 3700 South High Street. There were two concerns. The first had to do with the impact on students, because when a board meeting is held in a school building, the auditorium is not usable the day prior to allow set up all of the audio visual equipment needed. With end of the year programming and awards in school buildings, the group discussed that the end of the school year was probably not an appropriate time to hold a board meeting in a school building. Second, there was a discussion of space and whether the middle school would have the space necessary should the audience be as large as it was the meeting prior. The group overall felt the meeting should be moved and discussed that, moving forward, meetings should not be held in school buildings during the month of May. The meeting was then moved to 3700 South High Street and a Media Alert notifying the public of the change was issued on May 14, 2024. (Exhibit 14).

After the Communications Team and Board Services shared their communications plans, Board Member Simmons said that he had ideas that he wanted to present. He handed a copy of the Simmons Document (Exhibit 2) to every person in the room and

then sat at the table and went through the document. Overall, he spoke for about 20 minutes and by every account was “fired up.” Simmons saw Jacqueline Bryant (Interim Executive Director of Communications) shaking her head “no,” and said, “I see you shaking your head, Jackie, but I’ll come back to you.” Simmons acknowledged out loud that he knew they “weren’t going to do some of these things.” As Simmons worked his way through the document and expressed ideas that seemed to many as unprofessional or childish tactics to take against the CEA, Board Member Adair said to Board Member Simmons “who wrote this?” He responded, “I did,” a comment uniformly recalled by witnesses. He also said, “the things in this document are my ideas, my thoughts” and “it’s a collaboration, I’m not making a suggestion that we do all the things, I know some of these things we’re not gonna do.” When Simmons discussed targeting the Union and John Coneglio, Adair made the comment “it sounds like you don’t want to be endorsed again, do you?” (Simmons was an endorsed candidate by the CEA). Simmons responded with something along the lines of “I might be just a one-term board member” and that he was fine with that because he believed in what he was doing.

As Board Member Simmons continued through the document, witnesses were surprised at what they heard and described faces in the room as “looking shocked.” Some of those present verbally said “no” and shook their heads, but no one stopped Simmons from proceeding through the document. When Simmons mentioned an idea about racial division, Board Member Adair said “whoa, we can’t do that, that’s not gonna happen.” Jacqueline Bryant said “Can I say something? We’re not going to do any of these things, we are never going to target the media that way.” Then others said things like “this isn’t how we want to handle labor relations.” Simmons explained that there was a lot of misinformation out there, and brought up the issue involving the Levy Statement of Facts, discussed above. Dr. Chapman felt threatened when Simmons suggested that if the communications for the Task Force went wrong “you’ll be the next Talisa Dixon.” Board President Vera described feeling the same when Board Member Simmons said also that she would be “the next Carol Beckerle.”

The meeting ended sometime around 5:30 pm. Board Member Adair left a bit earlier than others in order to head to another obligation. As they walked out, Vera said to Simmons “you gotta be light.” She said she meant that he needed to ease up on the Union. That was the end of their communication and they went their separate ways. That night, Board President Vera called Vice President Pierce and told her that Simmons had pulled out a document at their meeting with “crazy ideas,” and “talking about going to war with CEA.” She said to Pierce “you need to get your boy under control.” Board Member Simmons sent Dr. Pierce a text at 6:39 pm asking her to give him a call, and she returned his call about three hours later. Dr. Pierce told Simmons that Board President Vera had called her to tell her about the meeting and that she said he presented some “crazy shit.” He told her about it and Dr. Pierce said to him “no Brandon, we are not doing that.” Dr.

Pierce asked him what exactly he passed out at the meeting, and so he said he would send it to her. Simmons then sent to Dr. Pierce an e-mail with a link to the Google Doc, but Dr. Pierce said she never opened it that night or after. (See, Exhibit 9).

On May 11, 2024, a CEA Teacher Retirement Recognition Dinner was held. Board members Ingles, Vera, and Simmons attended. Superintendent Dr. Chapman and Chief of Staff Mike DeFabbo also attended, and all were seated at a table next to the CEA leadership. During the dinner, Simmons pulled Mike DeFabbo aside (only about 5 feet away from Coneglio) and said, “we need to destroy John Coneglio politically.” DeFabbo said, “I don’t think anyone is looking to pick a fight with the union” and then said, “we should absolutely correct false statements.” DeFabbo described feeling shocked and appalled by the statements by Board Member Simmons and said that he left the dinner in haste at the end of the event. Other witnesses confirmed Simmons saying at the dinner “I’m taking John [Coneglio] down.”

On Monday, May 13, 2024, Board Member Simmons went to the District administrative offices to collect the copies of the Simmons Document he handed out at the meeting on May 10th. Beth Hess collected the documents from Carl Williams, Lydia Wiggins, Latrece Griffin, Jacqueline Bryant, and Tyler Carter and returned them to Board Member Simmons. Board Member Simmons explained that some of the copies had handwritten notes on them. However, he did not produce any of these copies to legal counsel, stating that they are “no longer in [his] possession.” Regarding other copies of the Simmons Document, Board Members Adair and Vera took their copies with them when the meeting ended. Board Member Adair kept hers; Board Member Vera threw hers away that weekend.

After having his copy collected on May 13, 2024, Mr. Williams attempted to access the Google Document from the link Board Member Simmons had sent him on May 10th, but the document was no longer available, having presumably been blocked or deleted by Board Member Simmons. Board Member Simmons continued his attempts to collect the document. On May 16, 2024, Simmons arrived at the administrative offices in advance of the evening community engagement session and went into Chief of Staff DeFabbo’s office. He shut the door and said that he had passed a document out at a meeting the week prior and asked DeFabbo if he would try to get it back for him from Board Member Adair. Simmons then said, “there’s also a question of whether or not the document is a public record, but we’ll deal with that later.” DeFabbo never asked Adair for the document. Later that evening, Board Member Ingles was on the phone talking to Board Member Adair when Adair told her about the communications meeting the week prior. She said, “Simmons passed out this crazy document, talking about dividing the union, race division, you should have seen the look on people’s faces.” Ingles asked Adair to send it to her.

Board Member Adair took photos of each page of the Simmons Document and sent them to Board Member Ingles at 9:32 pm via text. Ingles felt the document was worse than she had expected. The next morning (Friday, May 17, 2024) she spoke to her friend Jamie Shumaker, who serves as Executive Secretary for the AFL-CIO Central Labor Council, and they arranged to meet that morning at 9:30 am. Ingles sent Shumaker the copy of the Simmons Document she had received by text. By the afternoon of May 17, 2024, several individuals were aware of the Simmons Document, seemingly all local politicians. It appears that Board Member Simmons learned sometime between 4:00 and 6:00 pm on May 17th that the Simmons Document was being shared publicly.

After May 17th, it seems that colleagues were largely not speaking to Board Member Simmons or returning his calls. Dr. Chapman answered Simmons' call on Saturday, May 18, 2024, however. He told her that he wanted to "set up a meeting with board members and the administration" on Sunday (the following day) and he wanted to tell CEA that they were "going to pause the Task Force" among other things. Simmons explained that if they did that, he thought CEA would "forget about" his document. Simmons said "if we don't do this by 8 am on Monday, it's going to be ugly." Dr. Chapman told Simmons that he really needed to be talking to the board president. Simmons tried, but Vera did not return his call. Vice President Pierce understood that no other board members were talking to Simmons. She did not speak with him on Saturday May 18th, but she did speak with him on Sunday, May 19th. Simmons told Dr. Pierce that "many people helped create the document, with many meetings." Dr. Pierce asked who they were, and Simmons would not say. Dr. Pierce told him "you need to get the many people to help you now."

On May 21, 2024, CEA sent all board members the document "Open Letter to Columbus City Schools BOE Members." (Exhibit 1). Before noon, the Simmons Document was published in the media. That evening, Board Member Simmons sought out the press and made statements on two occasions, discussed above. (Exhibit 3). The following day, Board Vice-President Dr. Pierce spoke to Simmons on the phone and asked him who he was talking about when he said "many people" helped him with the Simmons Document. Simmons said "that question goes away when we move forward. We could have moved beyond that if we had just moved forward." She asked him again, "do you have a 'many'?" He responded by saying "I always have something in my back pocket." Simmons eventually said to Dr. Pierce that he did have a "many," but said "please don't ask me who it is." Board Member Simmons then issued a press statement on May 23, 2024 that suggested he was an unwilling participant in the Simmons Document and that he "should have said no." (Exhibit 15). Board Member Simmons called me just before making the press statement to give notice of it. He read one paragraph from the statement which suggested that he was an unwilling participant in creating the document. I said to him that it sounded like he was saying that he was used by someone; that he

was just a pawn in someone else's plan. He said the statement was "an apology" and would not answer who the person or persons were that he was now alleging forced his hand.

Throughout the investigation, only two versions of "The Simmons Document" were identified – the May 9 version (Exhibit 6) and the May 10 version (Exhibit 2). The May 9 version (Exhibit 6) was handed to Dr. Chapman by Board Member Simmons on the evening of May 9, 2024 at Ohio State. The May 10 version (Exhibit 2) was passed out by Board Member Simmons at a district meeting on May 10 at 3:30 pm and later disclosed in the CEA "Open Letter." (Exhibit 1). When I met with Board Member Simmons on May 30, 2024, he brought with him two additional copies – one was dated May 10, 2024 the other May 13, 2024. Simmons said the second May 10, 2024 version was created after the 3:30 pm meeting that day ended. Simmons said the May 13, 2024 version was created after a leadership meeting on the morning of May 13. (See, Exhibits 10 and 11, respectively). I followed up with the others present at the May 13 leadership meeting (Superintendent Dr. Chapman, Board President Vera, and Vice-President Dr. Pierce) and all of them explained that Board Member Simmons was not scheduled to attend, but was sent the Zoom link at the tail end of the meeting. While he joined the Zoom, he did not have his camera on and he did not share any documents. He did not mention the Simmons Document and neither did anyone else. The two topics discussed after Board Member Simmons joined the meeting were (1) the Task Force update to City Council that they were providing the following day; and (2) the tour of Columbus Alternative High School (CAHS) that was also taking place the following day.

Board Member Simmons was asked whether he showed the second May 10 version or the May 13 version of his document to anyone else, and he would not answer. He was asked if anyone else helped him write those two documents or the previous two, and he would not answer. He was asked whether anyone else physically typed into the document and he said "that did not happen." He was asked whether he gave access to the Google Document to anyone else. He said he gave access to Carl Williams on May 10, 2024 so that Mr. Williams could make copies of it and that he gave access to Dr. Pierce after 10:00 pm on May 10, 2024 when she asked him what he had passed out at the meeting. As explained above, Dr. Pierce stated that she never clicked on the Google Document link or viewed the document.

Investigation Findings

The following findings are based upon the evidence and testimony available at this time, recognizing that the investigation is incomplete without Board Member Simmons' full cooperation and production of documents, particularly without access to the Google Document. With that understanding, I reach the following findings of fact:

1. Board Member Simmons on his own authored all versions of the document he titled "Taking Control of the Task Force Narrative."
2. Board Member Simmons saved the document on his personal Google Drive and no other board members or District administrators accessed it except one staff member accessed the document one time on May 10, 2024 to make copies of it after he was asked to do so by Board Member Simmons.
3. The ideas set forth in the May 9, 2024 Simmons Document were those expressed by Board Member Simmons. He expressed those ideas in his text to Board Member Pierce that morning, in his audio message to Board President Vera that morning, and later when he met with Dr. Chapman and Board President Vera that evening. (Exhibit 6).
4. The ideas set forth in the May 10, 2024 Simmons Document were those expressed by Board Member Simmons. He told board members and District staff at the May 10th meeting that he alone had authored it and that they were "his ideas."
5. Prior to receiving criticism during the May 10, 2024 meeting, Board Member Simmons was enthusiastic about the ideas set forth in both the May 9 and May 10 versions of the Simmons Document. After many of his ideas were shot down by the group on May 10, 2024 and staff explained to Simmons why some of them were so harmful, Board Member Simmons became defensive and attempted to recover the document so that it would not be seen by others.
6. Board Member Simmons deleted the Google Document or disabled the link for the Google Document sometime between Friday, May 10, 2024 at 10:00 pm and Monday, May 13, 2024 at noon.
7. No version of Board Member Simmons "Taking Control of the Task Force Narrative" was approved as a communications plan for the District.
8. The District's Communications team and Board Services team created the District's official Task Force communications plan, titled the "Board of Education Engagement Plan" and the District has been operating under that Plan. (Exhibit 13).
9. No other Columbus City Schools Board Member or employee knew, prior to May 9, 2024, that Board Member Simmons was preparing written ideas in what is now referred to as the Simmons Document.
10. The first time the Simmons Document was seen by any Board Member or District employee was May 9, 2024 after 8:00 pm, when Board Member Simmons approached Board President Vera and Superintendent Dr. Chapman to tell them about his ideas.
11. Board Member Simmons' comments to the media about collaborating to create the Simmons Document are unsupported by the evidence and testimony, at least as it relates to any Board members or District employees.

12. No board members or district employees were aware that Board Member Simmons continued to draft versions of the Simmons Document after he presented it at the meeting on May 10th, even if he did continue.
13. Board Member Simmons has public records in his possession that are the property of Columbus City School District, and he has refused to produce them despite several requests.
14. If Board Member Simmons' statements are true regarding many meetings and many stakeholders being involved in the creation of the Simmons Document, it appears that he is referring to individuals outside of Columbus City Schools.