

To: Judith M. Eaton Lamp, Ed.D
Minnesota Board of School Administrators

Re: ISD 279 Complaint

Date: July 24, 2008

From: Families Involved In Neighborhood Schools (FIINS@yahoo.com)

This complaint is submitted in accordance with the provisions of 3512.5299 Code of Ethics for School Administrators.

Based upon information and belief (as more fully described herein and as supported per attached evidence referenced herein), this complaint identifies and alleges violations of the Code of Ethics for Minnesota School Administrators committed by ISD 279 Superintendent Susan Hintz. In certain instances, the information supports an allegation that Ms. Hintz acted willfully or in wanton disregard for the law or the rights of the voting public. While the matters identified herein address violations of the Code of Ethics specifically, such facts may also implicate other violations of law or regulations apart from the Code of Ethics and warrant further consideration and investigation by appropriate authorities to protect the public interest. We encourage further independent investigation and the involvement of a representative of the State Attorney General's office as contemplated in 3512.5299. The complainants reserve the right to amend and modify this complaint to the extent further facts are discovered or come to light which impact the identified violations or give rise to violations not identified herein.

Violations of the following Standards of Professional Conduct are alleged in this complaint:

- A school administrator shall take reasonable action to provide an atmosphere conducive to learning.
- A school administrator shall not misuse professional relationships with students, parents and caregivers, staff or colleagues to private advantage.
- A school administrator shall not knowingly make false or malicious statements about students, families, staff or colleagues.
- A school administrator shall not engage in conduct involving dishonesty, fraud, or misrepresentation in the performance of duties.
- A school administrator shall provide professional educational services in a nondiscriminatory manner.

BACKGROUND – 2007 Levy

In October 2007, a “Vote Yes” Committee was formed to assist the School District with educating the public about a series of three levy questions going before District 279 voters on the November 2007 ballot. Patrick Brink, a communications consultant, was hired by the District upon an approved expenditure request by Susan Hintz to assist the “Vote Yes” committee and other proposal-related matters. School Board Member Lyn Myszkowski was also assigned to the “Vote Yes” committee.

It is of extreme importance to note that this committee disseminated false and misleading information to the public (**Exhibit 1a and 1b “Vote Yes” Brochure**) regarding the levy questions’ ramifications. The literature constructed, printed and distributed by the “Vote Yes” Committee and “Vote Yes” website (**Exhibit 1c**) plainly state that if Levy Question #1 was approved by voters, the school district would:

“Avoid teacher layoffs and crowded classrooms, diminished school bus transportation, school closings, and more.”

Levy Question #1 was passed by the community during the referendum, yet the District Administration put forth and the School Board approved a plan to close two schools, lay off approximately 185 teachers and staff, and repurpose multiple school buildings.

The School District has tried to distance itself from its accountability for the work of the “Vote Yes” committee by stating the committee was independent of the district. However, it is difficult for the public at large to understand that a paid consultant *hired by School District 279*, along with School Board Member Lin Myszkowski, could disseminate misleading information when their positions allowed them privileged inside information to the levy. Furthermore, it is even harder to believe that the District 279 Administration gave no approval to the articulation and presentation of the levy information provided to the public.

In addition to disseminating misleading information, it is questionable whether or not the School Board fully supported the passing of all three questions. The attached **Exhibit 2** document details correspondence between School Board Clerk Lin Myszkowski and Superintendent Hintz after the levy referendum. Myszkowski, who was responsible for the success of a public awareness campaign crucial to the School District, contends that the sweeping changes planned (Early Childhood Education, moved and expanded magnet school) for the School District would likely not have been possible had Levy Question #2 passed. “Amen” claimed Hintz in her response. Did the school board and administration truly support the “Vote Yes” effort? Did they want all three questions passed?

BACKGROUND – 2008 Budget Reduction Process

Beginning in late 2007, Osseo Area Schools (herein referred to as “School District”) was faced with cutting \$16.3 million dollars from the 2008-2009 operating budget. A

consulting company, TeamWorks International, Inc. (herein referred to as “TeamWorks”), was hired for \$35,000 to help facilitate and propose feasible, economical changes to assist the School District.

In December 2007, a motion was set forth to suspend School Board Policy 725 – Establishing School Attendance Boundaries (**Exhibit 3a and 3b**). This motion was approved on January 8th, 2008. As part of Policy 725, Section I, “G” states

“The School Board vote to adopt a final boundary plan will be made and announced no later than the second regular meeting in February of the school year preceding the change.”

The School Board approved the suspension of this policy in order to circumvent district bylaws with an eye toward accommodating and effecting substantial change in School District 279.

During the budget reduction process, there was a clear lack of fair community representation in fashioning the Proposed Facility Utilization Plan ultimately brought forth by action teams. These teams included the hired consulting firm of TeamWorks, the School District’s handpicked Action Team, and various other teams appointed by the School District. The following is an excerpt from the Superintendent’s newsletter, dated May 2, 2007, of the selection process of the Action Team members chosen to drive the transformation of the ISD 279 organization:

“The 52 members of the Action Planning Teams, led by Kate Maguire, Assistant Superintendent, and Mike Looby, Director of Community Education and the District 279 Foundation, are made up of parents, teachers, representatives from the business sector, community members and school administrators. As individuals were recruited to serve on these teams, we looked for individuals who were willing to learn about, envision, and create plans of action consistent with the strategic plan; experience working with groups; project planning; willing to work with others to reach consensus; ability to envision possibilities; and willing to set aside special interests.”

In addition, School Board Policy 810 – School Facilities (which was not suspended) was disregarded and not followed (**Exhibit 4a and 4b**).¹ According to Policy 810, Section II, “B”:

¹ Policy 810 provides the protocol that must be followed when the Superintendent is contemplating “adjustments to, renovation of, and/or new construction of space to: 1. Handle increases or decreases in student enrollment, or Support District Programming, or Provide equity, or 2. Meet appropriately determined standards.” Policy 810 involves **three deliberative Phases** that were ignored, and directs how each of these Phases must be carried out. Phase I alone requires input from district administration, building level administration, staff, parents, students and the community at large in the development of options for consideration, and parent representation from each building on a Phase II advisory committee is necessary to review and provide input on options developed in Phase I.

“The facilities study will include input from district administration, building-level administration, and staff, parents, students (when appropriate), and the community-at-large.”

Apart from the requirements of Policy 810, the School District did put together a “Closing and Boundaries Action Team” to help with its planning, but these committees were comprised *almost entirely* by School District Administration, Staff, and Employees (**Exhibit 5**). The only “community member” on the team is a former school board member. There was a significant lack of “parents and community-at-large” representation during this process. This is a direct violation of the School Board’s very own bylaws put in place to protect a fair and equitable process for everyone involved.

BACKGROUND – 2008 Proposal

The following are the series of events that took place leading up to and surrounding the proposed changes by the Osseo School District.

During a January 22, 2008 Board Meeting, a proposal from TeamWorks was presented (**Exhibit 6a – 6g**) to the School Board. This complaint alleges that this date marks the beginning of a process riddled with unethical and unprofessional behaviors by School District 279 Administration determined to effect rapid, sweeping, and publicly-unsupported change.

The proposed changes – the repurposing and closure of schools – represented only 5% of the \$16.3 million budget cuts yet displaced approximately 22% of the School District’s elementary school population. These changes yielded little financial gain for the School District compared to the extensive impact and cost imposed on its teaching staff, students and their families, and the taxpaying communities.

It remains questionable that the School District considered and ultimately adopted significant changes to elementary schools and their boundaries to save \$800,000. Additional questions surround the School District actually creating and expanding programs that are not mandated by the state of Minnesota when the budget could not sustain existing programs in a time of “unusual urgency.” (Take note that “unusual urgency”, from School Board Policy 208, was the premise for suspending School Board Policy 725.) Additional money was also needed to “convert” schools to be ready for the 2008-2009 school year including, but not limited to, drive-way parking lot and physical plant reconfigurations. The proposal, as adopted, created early childhood education programs, moved and expanded the Edgewood Elementary magnet school, and forced the closure of the following schools: Osseo Elementary School, Edgewood Elementary: A Science, Math, & Technology School, and Weaver Lake Elementary (for purposes of relocating Edgewood Elementary to the Weaver Lake facility). The following elementary schools were reconfigured: Cedar Island, Oak View and Fair Oaks Elementary schools. Again, this severe disruption and relocation of students and families

in the Osseo School District trimmed costs by \$800,000 (5% of required budget reduction).

During February 2008, the School District set up several “Community Comment” periods within the regularly scheduled School Board Meetings. They also established a “Community Café” in February 2008 to allow the community to share their concerns. Both the “Community Comment” and “Community Café” meetings revealed overwhelming opposition to the proposed changes. In February 2008, the School District put Mr. Brink in charge of conducting an online survey which illustrated that 74% of those taking the survey said they “somewhat disagree” or “strongly disagree” with the statement, “The proposed budget fairly balances the need to reduce staff and the need to close schools.” While the School District’s survey was not a scientific one, the survey’s conclusions recognized that “it is clear that the people completing the survey “strongly disagree” with implementing any of the school closings and changes that were listed in the chart accompanying the survey” **(Exhibit 7)**.

In no uncertain terms, the community was against this proposal. In fact, both the Osseo and Maple Grove City Councils passed resolutions opposing the School District’s proposal. Meanwhile, Superintendent Hintz represented publicly that there was strong support in favor of the proposal. However, in an email to staff (from unknown – redacted) dated February 21st, 2008 **(Exhibit 8a)**, the correspondence demonstrates that the district administration realized that there was still very little public support for this proposal (700 emails against proposal and only 20 in support of the proposal) which was only a few weeks away from going before the School Board for a vote to approve. The correspondence asks staff to email in their support of the proposal. What did Superintendent Hintz do to actively address the public’s hundreds of concerns submitted by email, letter, phone, Community Comment and Community Cafes? She knowingly misrepresented the community’s feedback on the proposal. In an interview with WCCO television reporter Heather Brown one week prior to the correspondence in Exhibit 8a, Hintz states that “about 40% of her emails encourage her to move forward” **(Exhibit 8b-8c)**. Many people on the board, and in the community and administration took her for her word.

Due to the significance of these changes, the community questioned the process that was followed and if there were other options that were proposed and/or being investigated. Superintendent Hintz stated that she had not received any additional options. This is, in fact, incorrect. There were at least 5 proposals **(Exhibit 9)**. Superintendent Hintz also stated time and time again that this was a transparent process. Yet at the same time in an email to staff, she directed that emails and files regarding additional options be deleted **(Exhibit 10)**. This was not a transparent process, but rather a bold attempt to hide options and proposals that should have been made available to the public for review, immediately and upon request.

The School Board adopted the recommended changes to the schools which included school closures and the repurposing of elementary schools by the School District on March 11th, 2008 on a 4-2 vote.

BACKGROUND – Public Asked for Information Related to the Proposal

There were many statements made by the Superintendent and School Board that prompted members of the community to question the motives and honesty of the Superintendent. This behavior prompted several and separate requests for public information from the School District beginning in late January 2008.

While the School District's correspondence and communication is public information via the Minnesota Data Practices Act, the School District did not move in a timely and efficient manner. It was not until a district parent took the School District to court ([Exhibit 11a – 11c](#)) that these documents were produced. In February of 2008, Mr. Joe Shoultz, a parent of children who attend public schools in ISD 279, requested correspondence related to the aforementioned information of the administration of District 279 as entitled via the Minnesota Data Practices Act. His repeated requests for the information went ignored and unfulfilled and he was forced to retain legal counsel. A hearing was held on June 3rd in the Hennepin County District Court with Judge Dickstein ruling on the matter. After Mr. Shoultz testified to multiple requests for the emails over the course of three months, Judge Dickstein ruled in favor of Mr. Shoultz and the School District was ordered to comply in delivering all emails by June 15th or sanctions would be imposed. During the hearing, counsel representing the School District admitted that they had not begun to work on the Data Practices Act request until early May, nearly 8 weeks after receiving the initial complaint, and had reviewed only around 8% of its correspondence. As the chief executive officer of the District, Susan Hintz was ultimately responsible for the decision not to comply with the public records request.

A portion of the emails were delivered, but the School District attorneys were unable to fulfill the complete request and negotiated more time to redact the remainder of the emails, which were ultimately delivered by the last week of June. Further, on the face of the facts currently known, a question remains unanswered whether the District made a good faith full disclosure. The School District indicated they had approximately 57,000 responsive documents, but to date, they have produced only around 22,000 documents. The public data received via this complaint has been included to help support these claims. However, even the provided data is not without problems, notably with respect to purposeful redaction of information. The District's legal team "over-redacted" the public information provided to the requestor of the information. Information like employee names should not have been redacted. Furthermore, many School Board members set up their District 279 email accounts to forward email to private boxes on other server systems (e.g. AOL, MSN Hotmail, gmail, Comcast). Produced materials prove the existence of said private email accounts via forwarded and replying correspondence. There was no evidence that official School Board business email documents residing in accounts on non-District 279 servers was provided to Mr. Shoultz. Given the incomplete set of district-identified email, it is obvious that the public data provided does not include all of the information that should have been provided under law.

SPECIFIC ACTIONS BY SUPERINTENDENT SUSAN HINTZ

Listed below are the Minnesota School Administrators Code of Ethics violations alleged with supportive evidence in filing this complaint against Susan Hintz, Superintendent of Independent School District 279.

ISSUE # 1 – Inappropriate Communication and Relationships with School Board Members

Superintendent Hintz has misused her relationships and demonstrated inappropriate and unprofessional relationships with District 279 School Board Chairperson Kim Green and School Board Clerk, Lin Myszkowski. The communication used by Superintendent Hintz with School Board members is not appropriate among school administrators and would not be acceptable in a private or corporate business environment. It is noted here as relevant because Superintendent Hintz, formerly known as Susan Brash, was forced to resign her role as Assistant Superintendent in the Warren Township (Indiana) School District because of an inappropriate romantic relationship she had with the District's Superintendent in 2001. Information pertaining to that situation can be found at the following web address:

http://www2.indystar.com/library/factfiles/gov/elections/2002/primary/stories/sch_warren_twp.html)

Evidence Submitted:

Exhibit 12 - Superintendent Hintz appears to send Board Chairperson Kim Green the initial proposal on January 21, one day before the proposal was presented to the rest of the board, "because I love you".

Exhibit 13 - Hintz sends Board Member Lin Myszkowski correspondence that mentions this proposal may be their legacy and states as a postscript that Hintz, Myszkowski and Green should have a slumber party.

Exhibit 14 - Correspondence between Hintz and Myszkowski. Myszkowski thanks Hintz for a Valentine's card and calls Hintz "the best Valentine the district has ever had". Hintz replies and states "thank you, dear one".

Exhibit 15 - Correspondence between Hintz, Green and Myszkowski where Myszkowski mentions that someone (name redacted) "stopped Dean (board member Dean Henke)" in his tracks. In Hintz's response, she writes to Green and Myszkowski, "love you both, no matter what".

Exhibit 16 - Hintz to Myszkowski "love for you"

ISSUE #2 – False Statements Made to Public and Order to Destroy Documents

Superintendent Susan Hintz knowingly made false statements in response to community members' requests for the other proposals that the School District had been evaluating. Furthermore, Superintendent Hintz ordered the alternative proposals created by TeamWorks be destroyed along with emails referencing same.

Evidence Submitted:

Exhibit 17a and 17b - A document from TeamWorks which explains that they were working with the School Closing and Boundaries Action Team to facilitate options. It also states that there were 5 options evaluated.

Exhibit 9 - A document dated January 15th that shows there were 5 options that the district was evaluating.

Exhibit 19 - A document that shows that Susan Hintz acknowledges that the School District's Action Team was largely responsible for the proposal, and that the hired consultant played a secondary role. In the correspondence, Hintz states that "One of the reasons we hired a consultant is to take some of the heat."

Exhibit 6a – 6g - The proposal that was presented during the January 22, 2008 Board Meeting.

Exhibit 21 - A document where Superintendent Hintz asks someone her team if the five options should be released to citizens.

Exhibit 10 - A document from Superintendent Hintz whereby she orders all documents and evidence of the 5 options be deleted by all that received the correspondence.

Exhibit 23a and 23b – Two of the several documents where Superintendent Hintz responds to parents' requests to see the 5 options and she claims that the options do not exist.

ISSUE #3 – Superintendent Used Public Voting Records in a Malicious Manner

Superintendent Susan Hintz knowingly sought out information relating to voting records of citizens who opposed the Administration's proposal. Superintendent Hintz specifically asks if they have the data and emails indicate that School District Administration had access to this information. Superintendent Hintz also asked School District employees and School Board members as to how they could publicly release this information. The intent was to discredit people in the School District who had been particularly vocal against the repurposing of their school by showing they did not vote in the November 2007 election. Not only would this possibly be classified as knowingly

making malicious statements about parents, but this would appear to violate Minnesota Statute 201.901 - REGISTERED VOTER LISTS; REPORTS; REGISTRATION PLACES.

Evidence Submitted:

Exhibit 24 - Document shows that someone (name redacted), most likely a district employee, had the voter registration list from the November 2007 levy, and that Susan Hintz wanted to see the list.

Exhibit 25 - Document from Hintz in which she asks someone (name redacted) to address WVR (Weaver Lake Elementary) parents who didn't vote through Community Comment. (This is a portion of ISD279 School Board meetings where community members may address the Board and community for a short, timed period.)

Exhibit 26 – From unknown person (name redacted). They have been speaking with Hintz and are asking if someone is willing to make a statement on the blog (most likely the blog that was launched by parents in the school district during this time period). The posted comment was intended to expose that two of eleven parent/spokespersons who opposed the Administration's proposal did not vote.

Exhibit 27 – Hintz asks School Board Treasurer Steven Antolak how the voting records of Weaver Lake Parents should be exposed.

Exhibit 28 - Correspondence between Kim Green (School Board Chairperson) and a parent. The parent asks why Kim Green publicly accused Weaver Lake parents of not voting during the levy. Green replies to that parent. This shows that Board Member Kim Green was given the voting records and used it maliciously against parents opposed to the proposal.

Exhibit 29 - Correspondence between unknown people (names redacted) where the person suggests that voting records shouldn't be used against parents because they just discovered that one School Board member, Chairperson Kim Green, did not vote on the levy and that the parents may find out and use it against her. It was acceptable to use voting records to discredit parents, but they shouldn't be used to discredit the School Board?

Exhibit 30 - Voting records by precinct from November 2007 School Levy. This file is provided as evidence that the Weaver Lake Elementary precinct was the only precinct to vote "Yes" on all three levy questions. It is unconscionable that the School Administration and School Board used voting records against Weaver Lake Elementary parents who supported public schools and vocally opposed the TeamWorks proposal.

ISSUE #4 – Superintendent Admits Component of Proposal May Lack Educational Benefit

A portion of the proposal submitted to the School Board by the Administration creates substantial risk of adversely impacting students in the School District. The campus proposal, in which Fair Oaks Elementary 4th, 5th and 6th graders will be bussed 7 miles, was developed in an effort to hide a failing school. Fair Oaks has not made adequate yearly progress (“AYP”) for three consecutive years. Is this approach legal? Does this create an environment conducive to learning for all involved?

Evidence Submitted:

Exhibit 31a – 31j - The revised boundary proposal dated February 6, 2008, which involves a campus solution. This campus approach moves Oak View K-3 to Cedar Island, repurposes Cedar Island into a Pre-K – 3 school, makes Fair Oaks a Pre K-3 School, and then combines all 4-6 grade students from Cedar Island, Fair Oaks and Oak View at Oak View Elementary.

Exhibit 32 - On February 11, 2008 (after the campus solution has already been proposed), Superintendent Hintz asks someone (name redacted), if there is any educational benefit to this proposal. In this correspondence she appears to acknowledge that this proposal will help Fair Oaks out of looming bad press regarding its AYP.

Exhibit 33 - Also on February 11, Superintendent Hintz asks someone (name redacted) if there is any educational benefit, or if they are doing this to support their plan. Does this mean that Hintz’s plan doesn’t necessarily aim to have educational benefits, but some other motive that is not conducive to learning?

ISSUE #5 – Superintendent Misused Position and Relationships to Incorporate Her Religious Beliefs into the Decision Making Process

The Superintendent misused her position and communicated with School Board members and other district employees, most notably the employees on the Action Team and Core Planning Team, in a manner whereby her private religious beliefs were made clear along with statements that these beliefs influenced her decisions and her actions. Hintz refers to the proposal as “His (God’s) plan”.

Exhibit 34 – Superintendent Hintz states “I have been praying minute by minute for wisdom and courage. I am so thankful that God is still on the throne; He is bigger than all of this; and He is already working out a perfect plan. I am praying that He uses you, me, and others to move forward His kingdom.”

Exhibit 35 – Hintz states “I want His plan.”

Exhibit 36a-36c – Correspondence between Hintz and “Team member” (name redacted, but presumably Fair Oaks Principal and Action Team member Michael Thomas as the author repeatedly refers to changes at FO – Fair Oaks). Susan asks her two questions around the budget proposal. The respondent tells Hintz “God has a Plan for Osseo....we must fight resistance.”

Exhibit 37a - Other documents detail an exchange between Hintz and Green where they presumably discuss Michael Thomas, stating that “we need to keep him, he is a man of faith.”

Exhibit 37b – Hintz corresponding with presumably an employee that is a part of the Core Planning Team.

ISSUE #6 – Superintendent and School District Administration Knowingly Present False Capital Expenditure Data Regarding Osseo Elementary School

When charged with identifying schools to close, District 279 Administration prioritized candidate schools in a list according to near-term capital improvement costs. Osseo Elementary and Edgewood Elementary schools were at the top of the list, however, Osseo Elementary costs were incorrect and overblown. This inaccurate data was presented to the School Board. Administrators were made aware of the false information, yet knowingly ignored the need for correction and proceeded to use the incorrect information as a fundamental basis for deciding to close the school.

Exhibit 38 – Letter to editor from Osseo Elementary School teachers as it appeared in the June 11, 2008 edition of the Osseo-Maple Grove Press.

Exhibit 39a – 39c – Correspondence between unknown (redacted) and Susan Hintz. It states that some of the assumptions behind the proposal to close Osseo Elementary were not accurate.

ISSUE # 7 - Superintendent Seeks to Circumvent State of Minnesota Open Meeting Law

Superintendent Hintz demonstrated intent to defy Minnesota’s Open Meeting Law by pulling together groups of three School Board members at a time.

This exact scenario has been addressed within Minnesota. Minneapolis recognizes that "Serial meetings in groups of less than a quorum for the purposes of avoiding public hearings or fashioning agreement on an issue may also be found to be a violation of a statute if under the facts of the situation it is clear the intent was to circumvent the open meeting law." Arden Hills City Attorney, Mr. Jerry Filla, explicitly advised that City Council in April 2003 against attempting to get around the open meeting law through the use of physical subgroup meetings, email and/or voice mail.

Evidence Submitted:

Exhibit 40a - On the face of this document, Superintendent Hintz corresponds with someone external to the District Administration charged with assisting on the matter and who is sensitive to avoiding "incriminating any staff or the District in any way". The name has been redacted but it intuitively points to TeamWorks. Hintz proposes two same-day meetings, each with three School Board members in attendance. The ISD279 School Board quorum is four.

Exhibit 40b – The meeting invite related to the meeting referenced in Exhibit 40a

Exhibit 40 c – Another reference to the Board trying to work around the Open Meeting Law to facilitate discussions that should be held in the public.

ISSUE #8 - Superintendent Fails to Provide Educational Services in a Nondiscriminatory Manner

Superintendent Hintz leads ISD279's three representatives on the Northwest Suburban Integrated School District #6078 ("NWSISD") Joint Powers Board and has been integral to its workings since joining ISD279 in 2001. Its lottery system appears dishonest and unconstitutional. NWSISD puts forth a magnet school application requesting information about race and ethnicity, deeming it "is necessary to assist in state and federal monitoring and will not affect a student's chance of assignment." However, NWSISD Policy 624, Section XI states that

- a) The applicant pool for each magnet school grade level will be analyzed for diversity.*
- b) Given sufficient diversity in the applicant pool, a simple random selection process will be conducted to determine which applicants will be offered seats.*
- c) If the diversity of the applicant pool is insufficient to ensure a student body consistent with the diversity goals outlined and approved by NWSISD in the "Purpose", a prioritized selection process will be conducted. At each magnet school, priority will be given to students residing in specific geographical areas. Students residing in the northern and western portions*

of the seven member districts will be given priority for assignment to schools located in the northern and western portions of the seven member districts.

d) In the event of a major deficiency in the diversity of the applicant pool, further geographic prioritization may be employed.

The “simple random selection process” is conducted using computer code written by Joseph White Associates and copyrighted by the firm and NWSISD. Public requests to see the code have been denied (see attached). Does this truly sound “simple”?

Furthermore, in March 2008, ISD279 announced a lottery system would now be used in connection with its Open Enrollment process. Details surrounding its execution do not exist within ISD279 Policy 558 or Procedure 558. Is ISD279 using the contradictory NWSISD application and Policy 624 as a model? What factors are used to award open enrollment seats in District 279?

Evidence Submitted:

Exhibit 41 - NWSISD #6078 Magnet School Application

Exhibit 42a – 42b - NWSISD #6078 Superintendent Letter to Parent

Exhibit 43a - 43d - NWSISD #6078 Policy 624 – Magnet Schools Lottery

Exhibit 44a – 44g - School District 279 Procedure 558

Exhibit 45 - School District 279 Open Enrollment Application

Exhibit 46 - School District 279 Unofficial “School Choice Process”

CLOSING

Actions such as these are unacceptable in any business setting. When behaviors such as these are discovered in corporate America, employees and management are held accountable – internally and externally. Leaders of our schools should be similarly held to these standards and, if the ISD 279 School Board fails in this regard, it is left to the proper authorities within the State of Minnesota to hold Superintendent Hintz accountable. The facts identified, without more, support a finding of egregious violations of the Code of Ethics.

Given the abuses of Superintendent Hintz identified herein (only discovered as a result of limited public access afforded to relevant facts) and given the lack of production regarding known emails that may provide further insight, these circumstances seriously warrant further independent government investigation. We welcome the involvement of representatives of the State Attorney General's Office. The demonstrated pattern of

inappropriate behavior by Superintendent Hintz and certain School Board members underlies the sweeping action taken to re-engineer the ISD 279 School District. This demands a swift and detailed investigation by the State into these matters, along with the finding of the violations alleged herein in order to safeguard and protect the public interest.

Thank you for your consideration of this complaint. If there are any questions regarding this complaint, please email us at FIINS@yahoo.com.