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THE STATE EDUCATION DEPARTMENT
THE UNIVERSITY OF THE STATE OF NEW YORK

In the Matter of
THE NEW YORK CITY DEPARTMENT OF EDUCATION - REGION 1
v.
NATALIE WILLIAMS
Section 3020-a Education Law Proceeding (File #8,253)

DATE: February 25, 2009
TIME: 11:45 a.m. to 1:30 p.m.
LOCATION: NYC Department of Education
Office of Legal Services
49-51 Chambers Street, 6th Floor
New York, New York 10007

BEFORE: ARTHUR A. RIEGEL, ESQ.
Hearing Officer
1 Willow Lane
Hewlett Harbor, New York 11557
Telephone: (516) 529-3208

1 Natalie Williams - 2-25-2009
 2 APPEARANCES:
 3 FOR THE COMPLAINANT:
 4 MINERVA JOHN-STULL, ESQ., of counsel
 MICHAEL BEST, ESQ.
 5 NYC DEPARTMENT OF EDUCATION
 OFFICE OF LEGAL SERVICES
 6 49-51 Chambers Street, 6th Floor
 New York, New York 10007
 7 Telephone: (212) 374-3882
 8 FOR THE RESPONDENT:
 9 NATALIE WILLIAMS, Pro se
 P.O. Box 2032
 10 Utica, New York 13503
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1	Natalie Williams - 2-25-2009		1
2	E X H I B I T I N D E X		2
3	Marked as	Description	Identified Page-Line
4	Hearing Officer's		
5	1	08 - 03	
6	2	Designation of hearing officer.	
7		08 - 09	
8	3	E-mail from Mr. Rubinstein.	
9		08 - 13	
10	4	E-mail from the hearing officer to Ms. Williams.	
11		09 - 02	
12	5	E-mail from the hearing officer to the Department and Ms. Williams, dated 2/17/09.	
13	1	Department's	
14	2	Charges and specifications.	
15		11 - 24	
16	2	Witness list and response to discovery demand.	
17		73 - 23	
18	1	Respondent's	
19		06 - 22	
20	1	Original discovery demand, by Mr. Rubinstein.	
21			
22			
23			
24			

1 Natalie Williams - 2-25-2009
 2 2 07 - 03
 Second demand for discovery,
 3 by Ms. Williams, dated 2/14/09.
 4 3 07 - 18
 Third demand for discovery,
 5 by Ms. Williams, dated 2/25/09.
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1 Natalie Williams - 2-25-2009
 2 (The prehearing commenced at
 3 11:45 a.m.)
 4 THE HEARING OFFICER: Okay.
 5 Fine. We're on the record at eleven forty-five
 6 a.m. on Wednesday February 25, 2009 in a
 7 prehearing conference in the matter of the
 8 disciplinary charges preferred against Natalie
 9 Williams, N-A-T-A-L-I-E, Williams, traditional
 10 spelling, pursuant to Educational Law 3020-a.
 11 Ms. Williams is appearing pro
 12 se. She has advised me that she is appearing
 13 pro se. She had initially been represented by
 14 Mitchell Rubinstein of the office of New York
 15 State United Teachers. In an e-mail dated
 16 February 7th of 2009, Mr. Rubinstein indicated
 17 that his office would no longer be representing
 18 Ms. Williams.
 19 Subsequent to my notification
 20 of -- of Ms. Williams' status I sent her an
 21 e-mail dated February 11th introducing myself,
 22 and indicating that the prehearing conference
 23 would -- would take place today. It was
 24 originally scheduled for noon, and it was

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1 Natalie Williams - 2-25-2009
 2 subsequently changed to eleven-thirty, however
 3 the time change was not particularly
 4 significant.
 5 Subsequent to that I received
 6 a document by e-mail from Ms. Williams, dated
 7 February 14th, indicating additional demands,
 8 and I then -- it was -- it was sent to me
 9 directly. I then, by e-mail, on February 17th,
 10 forwarded this document to Ms. John-Stull,
 11 as -- then yesterday Ms. Williams had e-mailed
 12 me and indicated that she would be e-mailing me
 13 a list of further discovery demands, and that
 14 that would be sent to me by e-mail this
 15 morning. I informed Ms. Williams by return
 16 e-mail that I would not be in my office this
 17 morning, and that -- she then responded by
 18 indicating that she would physically bring that
 19 with -- bring that document with her.
 20 So having said that, we're
 21 going to mark as Respondent Exhibit Number One
 22 the original discovery demands that were made
 23 by Mr. Rubinstein while he was still
 24 representing Ms. Williams.

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1 Natalie Williams - 2-25-2009
 2 I've marked as Hearing Officer Number One my
 3 designation as the hearing officer in this
 4 matter.
 5 Hearing Officer Number Two is
 6 my e-mail to Ms. Williams on 2/11/09. No,
 7 let's make that -- let's -- I need -- I need to
 8 change that. Hearing Officer Number Two will
 9 be the -- deemed the communication from Mr.
 10 Rubinstein on 2/7, indicating that NYSUT will
 11 not be representing Ms. Williams.
 12 Hearing Officer Number Three
 13 is my e-mail to Ms. Williams on February 11th,
 14 introducing myself and indicating the date of
 15 this prehearing conference.
 16 MS. JOHN-STULL: When is that
 17 dated?
 18 THE HEARING OFFICER: This is
 19 dated February 11th.
 20 MS. JOHN-STULL: Okay.
 21 THE HEARING OFFICER: You
 22 were copied on this.
 23 MS. JOHN-STULL: Right.
 24 THE HEARING OFFICER: Then

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1 Natalie Williams - 2-25-2009
 2 Respondent Exhibit Number Two
 3 is the demands of February 14th.
 4 MS. JOHN-STULL: One second,
 5 Mr. Riegel. Is that the additional
 6 discovery --
 7 THE HEARING OFFICER: Yes.
 8 MS. JOHN-STULL: -- demand?
 9 Okay. Is this your -- what
 10 you're planning to put in?
 11 MS. WILLIAMS: Uh-huh.
 12 MS. JOHN-STULL: Okay.
 13 Great. Thank you.
 14 MS. WILLIAMS: And then
 15 these --
 16 THE HEARING OFFICER: Yes.
 17 MS. WILLIAMS: -- right? And
 18 so, I guess we have additional additional
 19 demands, because I've got all this here.
 20 THE HEARING OFFICER: All
 21 right. That's -- that we'll mark -- we'll mark
 22 that as Number Three.
 23 MS. WILLIAMS: Okay.
 24 THE HEARING OFFICER: Then

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1 Natalie Williams - 2-25-2009
 2 Hearing Officer Number Four is my e-mail to Ms.
 3 John-Stull and Ms. Williams, indicating that I
 4 had forwarded Ms. Williams additional document
 5 demands.
 6 MS. JOHN-STULL: What's the
 7 date on that e-mail, please?
 8 THE HEARING OFFICER: 2/17.
 9 MS. JOHN-STULL: Thank you.
 10 THE HEARING OFFICER: Now, I
 11 understand that Ms. Williams has a third
 12 document.
 13 MS. JOHN-STULL: Now, is this
 14 a document that was sent today at ten o six
 15 a.m.?
 16 MS. WILLIAMS: Yes.
 17 MS. JOHN-STULL: I would like
 18 to see that document, Mr. Riegel, when you're
 19 finished.
 20 THE HEARING OFFICER: Okay.
 21 MS. WILLIAMS: It's the same.
 22 MS. JOHN-STULL: Okay. I
 23 just want to --
 24 THE HEARING OFFICER: It's --

3 (Pages 6 to 9)

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1 Natalie Williams - 2-25-2009
 2 MS. JOHN-STULL: -- verify
 3 that they're the same.
 4 THE HEARING OFFICER: Here we
 5 are.
 6 (Off-the-record discussion)
 7 MS. WILLIAMS: Okay. Can you
 8 tell me what Respondent's One is?
 9 THE HEARING OFFICER:
 10 Respondent One --
 11 MS. WILLIAMS: Oh, okay.
 12 THE HEARING OFFICER: -- is
 13 Mr. Rubinstein's original.
 14 And Respondent Two is --
 15 is --
 16 MS. WILLIAMS: It's the --.
 17 THE HEARING OFFICER: -- this
 18 document. All right. Three is --.
 19 THE REPORTER: I'm having a
 20 hard time hearing over the paper near the
 21 microphones, please.
 22 THE HEARING OFFICER: Okay.
 23 We'll just -- we'll just stop and let -- let
 24 Ms. John-Stull just review the papers that she

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1 Natalie Williams - 2-25-2009
 2 have not yet received. If I can get a copy of
 3 the charges I'd appreciate that. Department
 4 Number One --.
 5 MS. JOHN-STULL: Do you need
 6 a copy of the specifications? Go ahead.
 7 THE HEARING OFFICER:
 8 Department Number One is five specifications.
 9 MS. WILLIAMS: Isn't there
 10 six?
 11 THE HEARING OFFICER: Six
 12 specifications of misconduct. And that will be
 13 marked as Department's Exhibit Number One.
 14 I'll just ask Ms. Williams to
 15 look at this and -- and verify for me that this
 16 is, in fact, what she received.
 17 MS. WILLIAMS: Yes, it is.
 18 THE HEARING OFFICER: Okay.
 19 So, we have the -- we have the charges in
 20 place. We have the discovery requests in
 21 place.
 22 For the benefit of Ms.
 23 Williams, since she is appearing pro se, I
 24 think that I ought to outline the -- the

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1 Natalie Williams - 2-25-2009
 2 received, as compared to what was handed to me
 3 this morning.
 4 MS. JOHN-STULL: Thank you,
 5 Mr. Riegel.
 6 THE HEARING OFFICER: Okay.
 7 So now we have Respondent Three. Is this your
 8 only copy?
 9 MS. WILLIAMS: Yes, but --
 10 THE HEARING OFFICER: Is
 11 it --
 12 MS. WILLIAMS: -- it's okay.
 13 THE HEARING OFFICER: -- it's
 14 in your computer?
 15 MS. WILLIAMS: Yes, I can
 16 print it out later.
 17 THE HEARING OFFICER: Okay.
 18 Can I -- can I keep this?
 19 MS. WILLIAMS: Sure.
 20 THE HEARING OFFICER: Okay.
 21 So then, Respondent Three then is the
 22 additional demands dated February 25th of '09.
 23 Now, as Department Exhibit
 24 Number One I have premarked the charges which I

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1 Natalie Williams - 2-25-2009
 2 procedure we follow today. And then -- so
 3 that -- you're not a lawyer, and you --
 4 MS. WILLIAMS: Right.
 5 THE HEARING OFFICER: -- need
 6 to know, basically, what the procedure is for
 7 today.
 8 The fact that these charges
 9 have been put into evidence does not mean that
 10 they've been proven. All it means is that this
 11 what is being charged. This is a disciplinary
 12 matter, so that it is the burden of the
 13 Department to prove these charges by a
 14 preponderance of the evidence. That being
 15 said, the Department needs to go first, and
 16 produce witnesses and/or documents in an
 17 attempt to prove these charges.
 18 At the end of the
 19 Department's case then you will have the
 20 opportunity to present whatever defense you
 21 feel is appropriate. You also have the right
 22 not to testify at all. Each time the
 23 Department produces a witness, you will have
 24 the right to cross-examine the -- those

4 (Pages 10 to 13)

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1 Natalie Williams - 2-25-2009
 2 witnesses. Your -- your cross-examination,
 3 though, needs to be related to what their
 4 direct testimony was.
 5 If you testify, or if you
 6 produce witnesses on your own defense, then Ms.
 7 John-Stull has the same opportunity to
 8 cross-examine your witnesses that you have with
 9 the Department's witnesses. And at the end of
 10 the hearing each side has the opportunity to
 11 make a closing statement or an argument,
 12 depending on what the -- what the preference
 13 is. So, that's basically the broad outline of
 14 the hearing.
 15 By statute -- by Education
 16 Law 3020-a, there needs to be a prehearing
 17 conference, because according to the statute
 18 there are certain things that need to get done
 19 in advance of the commencement of the hearing.
 20 And the major effort at a prehearing conference
 21 is to review the document request that is made
 22 by the Respondent. According to the statute,
 23 you have the right to the production of certain
 24 documents that are relevant and germane to the

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1 Natalie Williams - 2-25-2009
 2 MS. WILLIAMS: Okay.
 3 THE HEARING OFFICER: Nothing
 4 more than -- we're not getting into the
 5 substance today. Today is all procedure.
 6 MS. WILLIAMS: Okay.
 7 THE HEARING OFFICER: Okay.
 8 So do you have -- do you have any questions
 9 before we begin?
 10 MS. WILLIAMS: I think I
 11 would prefer to have a copy of -- of this,
 12 Respondent Number Three, just because that way
 13 I can read along with you. Perhaps Respondent
 14 Number Two and Three, because I don't have
 15 those copies.
 16 THE HEARING OFFICER: Okay.
 17 Why don't we take -- why don't we take thirty
 18 seconds? Can I impose -- oh, you have?
 19 MS. JOHN-STULL: Two, and
 20 I'll make a copy of Three.
 21 THE HEARING OFFICER: Okay.
 22 MS. WILLIAMS: Okay. Thank
 23 you.
 24 MS. JOHN-STULL: No problem.

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 2 charges that are being preferred. Where there
 3 are objections to a it, I hear the objections
 4 and make rulings on them, and either direct the
 5 Department to produce the documents, or to deny
 6 the request for them as not being relevant to
 7 the charges.
 8 At the conclusion of that
 9 discussion, we then set the calendar for the
 10 hearings, and then we -- we move ahead with the
 11 hearings, giving the Department sufficient time
 12 to produce the documents that are of -- that
 13 you need to get. The -- the key issue is
 14 giving you the material that you would -- that
 15 you would need to allow you to put forth an
 16 adequate defense against these charges.
 17 So your burden will be to
 18 show that what you're asking for is relevant to
 19 the charges. The Department -- the
 20 Department's response will be, if there are
 21 objections, that they're not relevant to the
 22 charges.
 23 MS. WILLIAMS: For today?
 24 THE HEARING OFFICER: Yeah.

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 2 THE HEARING OFFICER: Off the
 3 record for a second, Josh.
 4 (off-the-record discussion)
 5 THE HEARING OFFICER: Okay.
 6 I'm turning now to Respondent Exhibit Number
 7 One. These are the -- these are the items that
 8 were -- these are the items that are in the
 9 papers that were submitted by Mr. Rubinstein.
 10 On page four there is a motion to dismiss
 11 specifications three and five. Theory of the
 12 motion is that -- that this -- that these
 13 specifications allege arrests, and Mr.
 14 Rubinstein asserted that an arrest is not
 15 evidence of misconduct.
 16 I'm going to -- I'm going to
 17 deny the motion to dismiss, with the comment
 18 that -- that is not to say that a defense to
 19 these specifications cannot be made, that an
 20 arrest is not a conviction, but it's -- that's
 21 the defense. It's -- it's not a -- it's not a
 22 basis for the dismissal of the charges per se,
 23 but Ms. Williams will be free and entitled to
 24 argue that this is not evidence of misconduct,

5 (Pages 14 to 17)

1 Natalie Williams - 2-25-2009
 2 and her rights are not being interfered with.
 3 She can have -- she has an absolute right to
 4 make -- to raise the defense that Mr.
 5 Rubinstein is asserting in the -- in his
 6 papers.
 7 Turning now to page six,
 8 which is the Bill of Particulars and the
 9 request for the production of documents.
 10 Are there any items in here
 11 which -- to which the Department objects?
 12 MS. JOHN-STULL: Yes, Mr.
 13 Riegel.
 14 THE HEARING OFFICER: Go
 15 ahead.
 16 MS. JOHN-STULL: Good
 17 morning. With respect to item number one,
 18 addresses and phone numbers, to the extent that
 19 these people are not D.O.E. employees -- if
 20 they're D.O.E. employees that would be readily
 21 available and would be turned over, but private
 22 information we do not provide. If --
 23 THE HEARING OFFICER: Are any
 24 of the -- to just cut to the chase, are any of

1 Natalie Williams - 2-25-2009
 2 the witnesses going to be other than D.O.E.
 3 employees?
 4 MS. JOHN-STULL: No.
 5 THE HEARING OFFICER: Okay.
 6 Then the witness list will be provided, and
 7 their place of -- place of work will made known
 8 to Ms. Williams, so that if she needs to
 9 contact them she can, at their workplace.
 10 MS. JOHN-STULL: Yeah.
 11 MS. WILLIAMS: And these are
 12 the D.O.E. employee witnesses?
 13 THE HEARING OFFICER: Right.
 14 Okay. Anything else?
 15 MS. JOHN-STULL: No, Mr.
 16 Riegel.
 17 THE HEARING OFFICER: Okay.
 18 Then we will then --
 19 MS. JOHN-STULL: No. We're
 20 not going down in order?
 21 THE HEARING OFFICER: Oh,
 22 yeah, but I'm just saying what -- what other
 23 ones do you have objections to?
 24 MS. JOHN-STULL: What -- I

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 2 mean, at this particular time, and when I turn
 3 over my witness list, Ms. Williams will see
 4 that there are no student witnesses at this
 5 time. But the list indicates that we reserve
 6 the right to add witnesses. So to the extent
 7 that we do have student witnesses, Ms. Williams
 8 the practice, and -- just tell her. I don't
 9 want to, you know, say what you are in need of.
 10 THE HEARING OFFICER: My --
 11 my -- all right. There are no student
 12 witnesses at the moment.
 13 MS. JOHN-STULL: Right.
 14 THE HEARING OFFICER: Should
 15 there -- should the witness list be amended,
 16 the Department objects, and has -- has
 17 object -- objected as a matter of policy, to
 18 providing addresses and phone numbers of
 19 students. To the extent that you need to be
 20 able to contact these people, what -- what I
 21 have done in the past is you will give me a
 22 letter that is to be sent to the student and/or
 23 their parents. I will direct the -- I will
 24 direct the Department to have them mailed to

1 Natalie Williams - 2-25-2009
 2 those people, so that you can have contact with
 3 them, without breaching the confidentiality of
 4 their phone numbers and addresses.
 5 But there are none at the
 6 moment, and I -- I would -- I would expect that
 7 if that changes, that there will be ample
 8 notice given to Ms. Williams so that she can
 9 seek to contact them in the manner that I
 10 described.
 11 With respect to teachers,
 12 employees, teachers and employees will be
 13 subsumed within item one. Parents, same thing.
 14 If there are parents who are -- but there are
 15 no parents referenced in the charges.
 16 MS. JOHN-STULL: Correct.
 17 THE HEARING OFFICER: But if
 18 that were to change, then the same -- we would
 19 do the same thing with parents as we do with
 20 students.
 21 Okay. Let's move on.
 22 MS. JOHN-STULL: Okay.
 23 THE HEARING OFFICER:
 24 Anything further?

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 2 MS. JOHN-STULL: On Number
 3 Two now. With respect to number three, to the
 4 extent, and at this point, there is no S.C.I.
 5 report. The office of appeals and review,
 6 there's no report to my knowledge. Alleged
 7 corporal punishment incident reports, police
 8 reports, arrest records, certificates of
 9 disposition and transcripts of -- transcripts,
 10 and I'm not sure if this is relating to the
 11 arrest, this would all be within the
 12 Respondent's possession, and as a matter of
 13 fact, her arrests were -- I think she received
 14 violations and/or adjournment in contemplation
 15 of dismissal, she would have those records, and
 16 because we wouldn't be able to introduce those
 17 documents here, they're not even in our
 18 possession.
 19 THE HEARING OFFICER: Okay.
 20 To the extent that any of these documents do
 21 exist and are in the possession of the
 22 Department, let's begin -- witness statements
 23 are to be turned over; investigatory statements
 24 are to be turned over; exculpatory evidence is

1 Natalie Williams - 2-25-2009
 2 to be turned over; pictures; reports.
 3 You said there is no report
 4 of -- of the special commissioner of
 5 investigations?
 6 MS. JOHN-STULL: Correct.
 7 THE HEARING OFFICER: And
 8 there are no reports at the office of appeals
 9 and review?
 10 MS. JOHN-STULL: Not to my
 11 knowledge.
 12 THE HEARING OFFICER: And
 13 there are no -- there were no -- there were no
 14 allegations of corporal punishment?
 15 MS. JOHN-STULL: Not to my
 16 knowledge; correct.
 17 THE HEARING OFFICER: Okay.
 18 But the items that may exist are to be turned
 19 over. The ones -- you can't turn over that
 20 which don't exist.
 21 MS. JOHN-STULL: Let me ask
 22 you this, Mr. Riegel: I think I do have
 23 records pertaining -- documents pertaining to
 24 her arrest. But again, it's not something that

1 Natalie Williams - 2-25-2009
 2 we can introduce, because of it being -- now
 3 being sealed. Do I still have to turn these
 4 documents over? Because it's something --
 5 THE HEARING OFFICER: Let
 6 me -- let --
 7 MS. JOHN-STULL: -- she would
 8 have.
 9 THE HEARING OFFICER: -- let
 10 me advise -- let me advise Ms. Williams.
 11 They can't introduce arrest
 12 records because the -- because these files have
 13 been sealed. If you ask for them to be
 14 produced here, you are, in fact, I think,
 15 unsealing the record by yourself, which legally
 16 I think is not to your advantage, so -- I'm not
 17 your attorney; I can't offer legal advice or --
 18 but because you're pro se I feel -- I feel that
 19 I should -- I should say to you, if you go that
 20 route, and I tell them to turn it over to you,
 21 then basically you've unsealed the record by
 22 yourself, and I'm not sure if legally that's
 23 what you want to do.
 24 MS. WILLIAMS: I do have

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 2 copies of various papers regarding my arrest --
 3 my two arrests associated with this
 4 experience --
 5 THE HEARING OFFICER: Okay.
 6 MS. WILLIAMS: -- at John F.
 7 Kennedy High School. And they may end up being
 8 part of my defense.
 9 THE HEARING OFFICER: Well,
 10 then --
 11 MS. JOHN-STULL: Then she
 12 opens the door.
 13 THE HEARING OFFICER: -- then
 14 you open the door. I'm just -- I'm just
 15 advising you, you're opening the -- you will
 16 be -- you will -- we don't have to make a
 17 decision right now.
 18 MS. WILLIAMS: Uh-huh.
 19 THE HEARING OFFICER: But I
 20 would urge you to get some legal advice about
 21 this, before we proceed with it, because I
 22 don't want to be party to your acting in a
 23 manner inconsistent with your own -- with your
 24 own legal needs, without first telling you to

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 2 get some legal advice as to whether you want to
 3 go there.
 4 MS. WILLIAMS: But the simple
 5 fact that I was arrested two times, associated
 6 with being at or near the school --
 7 THE HEARING OFFICER: I
 8 don't --
 9 MS. WILLIAMS: -- is
 10 pertinent to the --
 11 THE HEARING OFFICER: -- I
 12 understand that, but the papers -- the papers
 13 are not going to come in through them, because
 14 they can't come in --
 15 MS. WILLIAMS: Right.
 16 THE HEARING OFFICER: --
 17 through them. Whatever was sealed by the court
 18 is sealed by the court.
 19 MS. WILLIAMS: Uh-huh.
 20 THE HEARING OFFICER: They
 21 may -- and I don't know. They may introduce
 22 testimony as to what happened in the school.
 23 MS. WILLIAMS: Uh-huh.
 24 THE HEARING OFFICER: They

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 2 In other words, the transcript of -- the
 3 transcript of what happened in court. If there
 4 was a court proceeding, and I don't know
 5 whether there was, let me just --
 6 MS. WILLIAMS: Uh-huh.
 7 THE HEARING OFFICER: -- but
 8 what will -- what will happen is -- is that --
 9 let's assume there's a plea bargain in court.
 10 And I don't know that, and don't respond
 11 because I don't want to know. Let's assume
 12 there was a plea bargain, and the -- and the
 13 judge allocutes you, and says is it true that
 14 on such and such date you did such and such a
 15 whatever --?
 16 **A. Right.**
 17 **Q.** And you say yes, I did.
 18 Well, that's an admission to the wrongdoing,
 19 and that may be part of a plea bargain.
 20 If you unseal the record, she
 21 has the right to then say, I want to get that
 22 court transcript and prove that she plead
 23 guilty to that charge.
 24 MS. WILLIAMS: Uh-huh.

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 2 can't introduce -- introduce records that went
 3 to the arrest, or what happened in court,
 4 because that record has been sealed, so --.
 5 MS. JOHN-STULL: To the -- if
 6 I may, Mr. Riegel.
 7 To the extent that, let's
 8 say, your principal, if he created a document
 9 saying you were arrested on such and such a
 10 date, this was the police officer. That I will
 11 turn over to you. But official court records,
 12 which I'm sure you will have more of than I
 13 would have of the school, I'm not allowed to do
 14 that. I can have testimony, and I will have
 15 testimony as to your arrest, but you should
 16 keep in mind, like Mr. Riegel said, you should
 17 seek counsel. You should seek legal advice,
 18 because you bring in a document, you're
 19 unsealing your record, and then it's for me to
 20 use whatever documents I want to use.
 21 MS. WILLIAMS: With --
 22 within -- within that, can you give me an
 23 example?
 24 THE HEARING OFFICER: Sure.

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 2 THE HEARING OFFICER: So it
 3 then be -- it then becomes an -- an admission
 4 of wrongdoing on your part. That happens all
 5 of the time. So just -- I'm not shutting the
 6 door on this. I'm simply saying to you --
 7 MS. WILLIAMS: Seek legal
 8 counsel.
 9 THE HEARING OFFICER: -- get
 10 some counsel on this first, because you need to
 11 have your eyes open when you decide whether you
 12 want to do it. And after that, if you say that
 13 you want whatever arrest records and
 14 certificates of disposition and transcripts and
 15 so on, whatever they have you'll get.
 16 But on the other --
 17 MS. WILLIAMS: Uh-huh.
 18 THE HEARING OFFICER: -- hand
 19 you're going to open the door to them being
 20 used.
 21 Okay. Student records.
 22 There are no students at the moment. If there
 23 are students -- if, in -- if, in fact, that
 24 changes, I will review the records and provide

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 2 you with whatever parts of the student records
 3 are relevant to you. By that I mean student
 4 health records, for example, are confidential.
 5 There's no reason why you should get the
 6 student record. On the other hand if the
 7 student has a history of lying, and that
 8 student's going testify, you're entitled to
 9 that. So, that -- but there's a provision made
 10 for that, but it doesn't exist at the moment
 11 because there are no student witnesses.
 12 Okay. Can we continue?
 13 MS. JOHN-STULL: Number four
 14 to the extent available. And at this point I
 15 don't have any information that there's tape or
 16 audio recordings.
 17 THE HEARING OFFICER: Okay.
 18 MS. JOHN-STULL: Number five
 19 I'll --.
 20 MS. WILLIAMS: Sorry, can I
 21 make a comment on that?
 22 THE HEARING OFFICER: Go
 23 ahead.
 24 MS. WILLIAMS: There -- there

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1 Natalie Williams - 2-25-2009
 2 do --
 3 THE HEARING OFFICER: -- have
 4 to do with --?
 5 MS. WILLIAMS: -- with 2005.
 6 THE HEARING OFFICER: Yes.
 7 MS. WILLIAMS: Because at
 8 that -- at that time Mr. Rotonno, upon hearing
 9 about this was -- was rather upset that there
 10 was a videotaping of this meeting, and he went
 11 through -- well, he insisted that I return this
 12 videotape. And I didn't quite understand what
 13 he meant, because I was -- I was summoned and
 14 directed, and I'd never been summoned or
 15 directed before, so I asked -- I asked my union
 16 rep about this. And she just advised me to,
 17 you know, not -- not make a big deal about it,
 18 and give Mr. Rotonno this videotape that he
 19 wanted.
 20 THE HEARING OFFICER: But
 21 I -- but I still -- I still don't understand
 22 what it has --
 23 MS. WILLIAMS: Oh, well, one
 24 of the --

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1 Natalie Williams - 2-25-2009
 2 most definitely is at least one videotape that
 3 is of issue, of --
 4 MS. JOHN-STULL: Can you be
 5 more --
 6 MS. WILLIAMS: -- import to
 7 me.
 8 MS. JOHN-STULL: -- specific?
 9 MS. WILLIAMS: Yes. There
 10 was a videotape taken in 2 -- the year 2003,
 11 and I had a group of students who went to the
 12 A.P.O., The assistant principal's office, of
 13 organization, and the -- the students basically
 14 were requesting to use some old -- old
 15 computers that the --
 16 MS. JOHN-STULL: Okay.
 17 MS. WILLIAMS: -- school
 18 wasn't --
 19 MS. JOHN-STULL: Let me --.
 20 MS. WILLIAMS: -- using, so
 21 I --
 22 THE HEARING OFFICER: Well,
 23 what does -- what does 2003 --
 24 MS. WILLIAMS: '3 have to

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1 Natalie Williams - 2-25-2009
 2 THE HEARING OFFICER: -- to
 3 do with --.
 4 MS. WILLIAMS: -- one of the
 5 allegations or specifications is regarding
 6 videotaping, and in it Mr. Rotonno said --
 7 essentially is saying that I was directed not
 8 to videotape in the classroom, and suggests
 9 that I -- and there's going to be a suggestion
 10 that I was, I guess barred or banned from
 11 videotaping --
 12 THE HEARING OFFICER: But --.
 13 MS. WILLIAMS: -- at a
 14 previous time. So, there is a -- so that 2003
 15 videotape ends up being pertinent to the 2005
 16 issue.
 17 MS. JOHN-STULL: The
 18 Department disagrees. I mean, I -- I don't see
 19 how the production of that is relevant to the
 20 charges. I still don't see.
 21 MS. WILLIAMS: Well, Mr.
 22 Rotonno insisted that I return a videotape in
 23 2003, and actually, in a nuance of expression,
 24 he believed that he had directed me to never

9 (Pages 30 to 33)

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1 Natalie Williams - 2-25-2009
 2 videotape in the school again.
 3 THE HEARING OFFICER: But
 4 they --.
 5 MS. WILLIAMS: Actually he --
 6 what he did was he directed me to return a --
 7 and it -- it wasn't even return; it was my own
 8 videotape. I gave him my own videotape. And
 9 it was a specified instance which I gave this
 10 videotape. There was no general barring of my
 11 videotaping, and that is one of the
 12 specifications.
 13 THE HEARING OFFICER: But you
 14 understand -- do you understand -- do you
 15 understand that with -- by asking for the
 16 production of that, you're almost proving
 17 specification two.
 18 MS. WILLIAMS: I'm not
 19 proving specification two. I'm -- I'm
 20 disproving specification two, which --
 21 THE HEARING OFFICER: I see,
 22 with the --
 23 MS. WILLIAMS: -- is why I
 24 would like it.

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1 Natalie Williams - 2-25-2009
 2 you're not charged with the 2003 videotape.
 3 MS. WILLIAMS: Understood,
 4 but there -- there is going to be an issue, I
 5 suppose, regarding previous videotaping that --
 6 THE HEARING OFFICER: Yeah,
 7 there --.
 8 MS. WILLIAMS: -- well,
 9 actually the description in the language there
 10 says that --
 11 THE HEARING OFFICER: It says
 12 prior warning not to --
 13 MS. WILLIAMS: -- that I --.
 14 THE HEARING OFFICER: --
 15 videotape students --
 16 MS. WILLIAMS: Right.
 17 Exactly.
 18 THE HEARING OFFICER: --
 19 prospectively.
 20 MS. WILLIAMS: And that's --
 21 that's -- that --.
 22 THE HEARING OFFICER:
 23 Prospectively.
 24 MS. WILLIAMS: What do you

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1 Natalie Williams - 2-25-2009
 2 THE HEARING OFFICER: --
 3 despite prior warning from Principal Anthony --
 4 Anthony --
 5 MS. WILLIAMS: Right.
 6 THE HEARING OFFICER: --
 7 Rotonno that not to videotape students. That
 8 shows that there -- that -- that there was a
 9 prior -- that would show that there was a prior
 10 incidence of videotaping students, and he --.
 11 MS. WILLIAMS: I also -- no,
 12 I -- I actually -- there was a prior instance
 13 to videotaping students, however the directive
 14 that Mr. Rotonno sent was not expressed such as
 15 that. I actually have paperwork from Mr. Craig
 16 Shapiro (phonetic spelling) who is of the
 17 A.P.O., the assistant principal of
 18 organization, because I wanted to make sure
 19 that I had proof that I gave in this videotape,
 20 so I had him sign a document stating that yes
 21 indeed, Ms. Williams is handing -- handing over
 22 this videotape.
 23 THE HEARING OFFICER: But
 24 you're not -- but you're not charged with --

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1 Natalie Williams - 2-25-2009
 2 mean by that?
 3 THE HEARING OFFICER: In
 4 other words, you -- if there was a prior
 5 warning, it was prospective that you shouldn't
 6 be videotaping students. The question is did
 7 you videotape students -- and again, this is
 8 not for our -- this --
 9 MS. WILLIAMS: Yeah.
 10 THE HEARING OFFICER: -- this
 11 is only for -- for the procedure now. Did you
 12 videotape a student is the -- are the facts of
 13 October 6th as described? That's item one.
 14 Item two: Were you previously warned not to
 15 videotape students?
 16 MS. WILLIAMS: I was not
 17 previously warned not to videotape students.
 18 THE HEARING OFFICER: Okay.
 19 But that --.
 20 MS. WILLIAMS: I was told, or
 21 directed, to return a videotape.
 22 THE HEARING OFFICER: Okay.
 23 MS. WILLIAMS: And that's the
 24 important distinction I'd like to make.

10 (Pages 34 to 37)

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1 Natalie Williams - 2-25-2009
 2 MS. JOHN-STULL: Yeah, but
 3 that doesn't -- I still don't understand -- I
 4 still don't --.
 5 MS. WILLIAMS: I don't know
 6 how -- how more clear can I be?
 7 MS. JOHN-STULL: Well, okay.
 8 Let me --
 9 MS. WILLIAMS: He told me --
 10 MS. JOHN-STULL: -- say
 11 something --.
 12 MS. WILLIAMS: -- something
 13 else on -- in 2003. I complied with his
 14 directive in 2003, which was to physically give
 15 in -- or hand in a cassette.
 16 THE HEARING OFFICER: Is
 17 there a document -- is there a document --?
 18 MS. WILLIAMS: I -- and --.
 19 MS. JOHN-STULL: One second.
 20 THE HEARING OFFICER: Is
 21 there a document that you have, that you're
 22 going to be introducing to show that there was
 23 a prior warning?
 24 MS. JOHN-STULL: Yes.

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1 Natalie Williams - 2-25-2009
 2 not be able to produce it, because they
 3 intentionally wanted to cover something up, and
 4 they destroyed the videotape. And they
 5 actually didn't -- they did not prohibit me
 6 from videotaping, they simply demanded or
 7 directed me --
 8 THE HEARING OFFICER: All
 9 right.
 10 MS. WILLIAMS: -- to return
 11 it.
 12 THE HEARING OFFICER: All
 13 right. It sounds like what you're telling me
 14 is that -- is that you're asking for something
 15 that doesn't exist.
 16 MS. WILLIAMS: They -- it
 17 certainly did exist.
 18 THE HEARING OFFICER: No,
 19 but --.
 20 MS. WILLIAMS: Whether they
 21 have -- they've destroyed it at this point is
 22 really the question.
 23 THE HEARING OFFICER: All
 24 right. For the moment provide the documents.

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1 Natalie Williams - 2-25-2009
 2 THE HEARING OFFICER: Okay.
 3 That document is to be produced.
 4 MS. JOHN-STULL: Yes.
 5 THE HEARING OFFICER: That
 6 would -- that document is a document that they
 7 will have to use to show that there was a prior
 8 warning.
 9 The --the videotape, per se,
 10 is really irrelevant. What is relevant is --
 11 is that whether there was a warning on paper.
 12 And now, if he says I told you that, verbally,
 13 then he's going to testify to it, and then
 14 there's a question of is -- is it believable.
 15 But what -- but how -- but what's on the
 16 videotape is unimportant. What you videotaped
 17 is not really -- that's really not an issue.
 18 The issue is were you warned, going forward,
 19 that you shouldn't be videotaping students.
 20 MS. WILLIAMS: Sir, I believe
 21 that what is on the videotape is of extreme
 22 issue. In fact it is what -- it is part of
 23 what I believe is a cover up. And that is why
 24 the Board of Education, and Mr. Rotonno, will

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1 Natalie Williams - 2-25-2009
 2 If that tape doesn't exist, would you just
 3 please just --
 4 MS. JOHN-STULL: Investigate
 5 it?
 6 THE HEARING OFFICER: --
 7 notify us that -- well, just put it to rest.
 8 If it -- if -- if it does not exist, then
 9 that's the end of it. If it does exist we can
 10 come back to it.
 11 All right. Let's go on.
 12 MS. JOHN-STULL: Okay.
 13 Number five. I mean, to the extent that, in
 14 the charges, the exact location, exact date,
 15 day of the week, and time, I mean, to the
 16 extent that we can do that, it will be provided
 17 to the Respondent.
 18 Again addresses and phone
 19 numbers, D.O.E. contact information is readily
 20 available.
 21 THE HEARING OFFICER: The on
 22 or about October 6th --
 23 MS. JOHN-STULL: Right.
 24 THE HEARING OFFICER: --

11 (Pages 38 to 41)

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1 Natalie Williams - 2-25-2009
 2 October 25th, November 1st through November
 3 19th, December 8th and December 13th, is close
 4 enough in time.
 5 MS. JOHN-STULL: Yeah.
 6 THE HEARING OFFICER: And
 7 it's -- that's specific enough. To the extent
 8 that you have information available as to where
 9 the -- where all this happened, provide it.
 10 MS. JOHN-STULL: No problem.
 11 THE HEARING OFFICER: What
 12 else?
 13 MS. JOHN-STULL: Nothing else
 14 with respect to five.
 15 Number six.
 16 THE HEARING OFFICER:
 17 Anything in number six?
 18 MS. JOHN-STULL: Actually, I
 19 have written here explain, to attach copies of
 20 every warning, memo, letter, directive,
 21 addendum, observation, time card, punch card,
 22 sign-in sheet. You know, I know that Mr.
 23 Rubinstein is the one that prepared this
 24 document, if Ms. -- Ms. Williams is still

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1 Natalie Williams - 2-25-2009
 2 MS. WILLIAMS: Correct.
 3 MS. JOHN-STULL: I have no
 4 objection of -- on that.
 5 THE HEARING OFFICER: That --
 6 that -- you will get that.
 7 MS. WILLIAMS: Right. But --
 8 but for number six, I think he wants to make
 9 a --.
 10 MS. JOHN-STULL: Well, tell
 11 us what you want, because now you're the one
 12 that's here. You're the one that's trying this
 13 case.
 14 MS. WILLIAMS: Right.
 15 THE HEARING OFFICER: I don't
 16 know what you mean. What warnings are you
 17 trying to look at, letters in the file?
 18 MS. WILLIAMS: I received a
 19 number of letters from Mr. Rotonno. I don't
 20 actually know the distinction between being
 21 summoned and directed but I received a lot of,
 22 essentially what I would describe as harassing
 23 letters from the administration. And I think
 24 that Mr. Rubinstein, in writing that, was

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1 Natalie Williams - 2-25-2009
 2 requesting this information, I would like for
 3 her to explain what it is.
 4 MS. WILLIAMS: Okay. Can I
 5 see the document that --?
 6 THE HEARING OFFICER: It's
 7 item six.
 8 MS. WILLIAMS: Item six,
 9 "Attach copies of every warning, memo, letter,
 10 directive, addendum, observation, time card,
 11 punch card, sign-in sheet, and time and
 12 attendance record, referred to in the charges,
 13 or concerning the charges."
 14 Well, I think that -- I
 15 discussed this matter Mr. Rubinstein, and
 16 basically, are there any support -- is there
 17 supported evidence, on the part of the Board of
 18 Education regarding the charges. And if there
 19 are, then they should produce them.
 20 THE HEARING OFFICER: Well,
 21 you have -- you have -- item seven is -- is
 22 asking for every document that's been -- that's
 23 being -- that's being -- that is planned to be
 24 introduced into evidence.

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1 Natalie Williams - 2-25-2009
 2 trying to indicate that it was a copious amount
 3 of letter-writing going on --
 4 THE HEARING OFFICER: All
 5 right. Just --
 6 MS. WILLIAMS: -- regarding
 7 me --
 8 THE HEARING OFFICER: -- I
 9 need to know
 10 MS. WILLIAMS: -- and my
 11 file.
 12 THE HEARING OFFICER: -- what
 13 it is that you want in the way of documents.
 14 It seems that item seven subsumes --
 15 MS. WILLIAMS: Item six?
 16 THE HEARING OFFICER: -- item
 17 six. Whatever's going into evidence --
 18 MS. WILLIAMS: Okay.
 19 THE HEARING OFFICER: -- is
 20 going to be introduced, and you're going to
 21 get.
 22 MS. WILLIAMS: Okay.
 23 THE HEARING OFFICER: All
 24 right. Fine.

12 (Pages 42 to 45)

1 Natalie Williams - 2-25-2009
 2 Item eight has been
 3 withdrawn.
 4 MS. WILLIAMS: Is that Fn.'s?
 5 THE HEARING OFFICER: Yes.
 6 MS. WILLIAMS: Okay.
 7 THE HEARING OFFICER: Item
 8 eight has been withdrawn. The information
 9 concerning a student by the name of Fn.
 10 Okay. So, we're through the
 11 first of the documents. Let's go on to
 12 Respondent's Exhibit Number Two. I've reviewed
 13 this.
 14 MS. JOHN-STULL: I have too.
 15 THE HEARING OFFICER: Before
 16 we begin, you're going to have to explain to me
 17 what the relevance is of percentages of
 18 attendance, what that has to do with -- with
 19 these charges.
 20 MS. WILLIAMS: Well, first I
 21 have to ask are there going to be any
 22 additional charges made?
 23 THE HEARING OFFICER: I don't
 24 know.

1 Natalie Williams - 2-25-2009
 2 MS. JOHN-STULL: I don't know
 3 either.
 4 MS. WILLIAMS: Well,
 5 should -- should there be additional charges
 6 made, there's a possibility that one of the
 7 additional charges would be --.
 8 MS. JOHN-STULL: Can I
 9 interrupt?
 10 MS. WILLIAMS: Okay.
 11 MS. JOHN-STULL: I don't know
 12 if you want to say what I think you might be
 13 saying. I don't know what the additional
 14 charges might be, but again you know, where --
 15 Mr. -- Mr. Riegel and I are in -- in -- in such
 16 a position where we have to be as careful as
 17 possible, being that you're not an attorney.
 18 But again, you know, you -- you have to be
 19 careful in what you say, because anything you
 20 say here is up for grabs. It can be used
 21 against you.
 22 THE HEARING OFFICER: You
 23 can --
 24 MS. JOHN-STULL: And I can't

1 Natalie Williams - 2-25-2009
 2 promise --
 3 THE HEARING OFFICER: -- you
 4 could --
 5 MS. JOHN-STULL: -- that I
 6 won't.
 7 THE HEARING OFFICER: -- you
 8 could say now -- you could say now what you
 9 think what the charge would be. She might
 10 not --
 11 MS. JOHN-STULL: And I would
 12 be able to charge it.
 13 MS. WILLIAMS: Right. Right.
 14 THE HEARING OFFICER: She
 15 may -- she may be unaware of it, so that --
 16 MS. JOHN-STULL: So just --
 17 THE HEARING OFFICER: --
 18 don't --
 19 MS. JOHN-STULL: -- letting
 20 you know.
 21 THE HEARING OFFICER: So
 22 don't -- don't --
 23 MS. WILLIAMS: Don't let
 24 the --

1 Natalie Williams - 2-25-2009
 2 THE HEARING OFFICER: -- I
 3 guess --
 4 MS. WILLIAMS: -- cat out of
 5 the bag.
 6 THE HEARING OFFICER: --
 7 don't inculcate yourself.
 8 MS. WILLIAMS: Inculcate or
 9 implicate?
 10 THE HEARING OFFICER:
 11 Inculcate.
 12 MS. WILLIAMS: Inculcate.
 13 THE HEARING OFFICER: Make
 14 yourself -- exculpate is to make yourself not
 15 guilty. To inculcate is to make yourself
 16 guilty, or to appear to make yourself guilty,
 17 or to say to them look into this matter, maybe
 18 this is -- this would be an appropriate subject
 19 to charges.
 20 MS. WILLIAMS: Well okay.
 21 Then -- then I'll simply -- just let me say
 22 that should a certain additional charge occur,
 23 these would be --.
 24 THE HEARING OFFICER: If

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1 Natalie Williams - 2-25-2009
 2 there additional charges --
 3 MS. WILLIAMS: If there
 4 additional charges --
 5 THE HEARING OFFICER: -- you
 6 will have the opportunity --
 7 MS. WILLIAMS: -- then I will
 8 inquire --.
 9 THE HEARING OFFICER: -- to
 10 make whatever request for documents relative to
 11 those charges at the time.
 12 MS. WILLIAMS: Ah. Okay.
 13 Then -- then for now we can just hold off on
 14 this.
 15 THE HEARING OFFICER: And --
 16 okay. On the -- on the issue of the
 17 statistical information, we will --
 18 MS. WILLIAMS: On the
 19 attendance?
 20 THE HEARING OFFICER: --
 21 yeah.
 22 MS. WILLIAMS: Okay. Yeah.
 23 THE HEARING OFFICER: We
 24 will -- we will put is in abeyance.

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1 Natalie Williams - 2-25-2009
 2 called a "fishing expedition."
 3 If you have a reasonable
 4 belief that there are people who may have acted
 5 improperly, there is another forum for that.
 6 There is an office of special investigations.
 7 There is the special commissioner for
 8 investigations, where if you think that any or
 9 all of these people who have acted improperly,
 10 that's the place to go. I -- I have -- these
 11 people are not on -- on -- these people are not
 12 on trial before me. I have no jurisdiction to
 13 decide whether Robert Colon may have acted
 14 improperly or not. The -- my jurisdiction
 15 is -- just so you understand. I'm not -- I'm
 16 not --
 17 MS. WILLIAMS: Uh-huh.
 18 THE HEARING OFFICER: -- I'm
 19 not being -- I'm not being difficult with you.
 20 My jurisdiction is limited to this page. The
 21 only thing that I can decide is -- is it -- are
 22 you guilty or are you not guilty of these
 23 specifications.
 24 MS. WILLIAMS: Uh-huh.

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1 Natalie Williams - 2-25-2009
 2 MS. WILLIAMS: Abeyance.
 3 THE HEARING OFFICER: And --
 4 and if it -- if it comes up again, in terms of
 5 additional charges, you'll be free to refer
 6 back to this.
 7 MS. WILLIAMS: Okay. Fair
 8 enough.
 9 THE HEARING OFFICER: All
 10 right. Let's go on to salary and per-session
 11 reports for a variety of people. What's the
 12 relevance here to that?
 13 MS. WILLIAMS: I'm trying to
 14 be cautious and not let the cat out of the bag,
 15 as you just previously warned me. And
 16 therefore I think I'll have to speak quickly as
 17 I say this, but perhaps this information might
 18 be used to support suspicions that Ms. Williams
 19 had about administrators at the time.
 20 THE HEARING OFFICER: This
 21 is, with all due respect, a classical --
 22 there's a -- there's -- there's a word that --
 23 there's a word that is used among lawyers when
 24 you develop a request for materials. It's

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1 Natalie Williams - 2-25-2009
 2 THE HEARING OFFICER: That's
 3 to protect you.
 4 MS. WILLIAMS: Uh-huh.
 5 THE HEARING OFFICER: So
 6 that -- let's -- let us assume that Robert
 7 Colon did some bad things. I don't know
 8 what -- I don't know --
 9 MS. WILLIAMS: Uh-huh.
 10 THE HEARING OFFICER: -- what
 11 you may have in mind. There's nothing I --
 12 there's nothing I can do about it, because
 13 legally I have no authority to do anything
 14 about that.
 15 MS. WILLIAMS: Uh-huh.
 16 THE HEARING OFFICER: But
 17 I've told you the -- the alternative that is
 18 available to you.
 19 MS. WILLIAMS: Actually, sir,
 20 I've already made reports to one of the groups.
 21 I believe it was O.P.I.
 22 THE HEARING OFFICER: O.S.I.
 23 MS. WILLIAMS: O.S.I.? Okay.
 24 But I made reports to one of the groups and

14 (Pages 50 to 53)

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1 Natalie Williams - 2-25-2009
 2 they did make some investigation. So -- so
 3 basically I will say that I have a suspicion
 4 regarding excessive earnings of certain --
 5 THE HEARING OFFICER: Okay.
 6 MS. WILLIAMS: -- of certain
 7 J.F.K. employees.
 8 THE HEARING OFFICER: Right.
 9 MS. WILLIAMS: And that that
 10 suspicion is part of the reason that I was, I
 11 believe, targeted. And so, if I could prove
 12 that certain employees received excessive side
 13 income, or overtime income, that would
 14 basically support my --
 15 THE HEARING OFFICER: But --
 16 MS. WILLIAMS: -- argument
 17 that --
 18 THE HEARING OFFICER: -- but
 19 if --
 20 MS. WILLIAMS: -- I was --
 21 THE HEARING OFFICER: -- but
 22 if you --
 23 MS. WILLIAMS: -- unduly
 24 targeted --

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1 Natalie Williams - 2-25-2009
 2 MS. WILLIAMS: -- doing
 3 wrongdoing. And in so, and their protection of
 4 their overtime earnings, and because of their
 5 desire to protect their overtime earnings, I
 6 feel that I was unduly targeted.
 7 THE HEARING OFFICER: You
 8 can -- you can make the claim. You can make --
 9 you can make the argument that there was
 10 retaliation against you. You can make that --
 11 you can make that argument without this
 12 information being provided. Whether or not --
 13 MS. WILLIAMS: Uh-huh.
 14 THE HEARING OFFICER: --
 15 Rotonno got ten thousand dollars in per-session
 16 money or one --
 17 MS. WILLIAMS: Uh-huh.
 18 THE HEARING OFFICER: --
 19 thousand dollars or no thousand dollars in
 20 per-session money is not the issue. The issue
 21 is did -- you made -- you made a -- you
 22 reported your suspicions, and that as a result,
 23 whether the -- whether the suspicions were
 24 founded or not -- now, let's assume for a

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1 Natalie Williams - 2-25-2009
 2 THE HEARING OFFICER: -- I
 3 understand.
 4 MS. WILLIAMS: -- because of
 5 that.
 6 THE HEARING OFFICER: If --
 7 but if you -- if you made -- if you reported
 8 this to the proper agency, let's just -- let's
 9 say you reported it to the office of special
 10 investigations.
 11 MS. WILLIAMS: Uh-huh.
 12 THE HEARING OFFICER: So,
 13 let's say that they investigated it and found
 14 no merit to it. Then what is it, in your
 15 opinion, that I am empowered to do to say that
 16 the office of special investigations, which
 17 is -- which is established for that purpose of
 18 investigating wrongdoing, if they find no
 19 wrongdoing how am I suppose to find the
 20 wrongdoing?
 21 MS. WILLIAMS: It's really
 22 not about finding the wrongdoing. It's about
 23 my suspicion of them --
 24 THE HEARING OFFICER: Okay.

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1 Natalie Williams - 2-25-2009
 2 moment they were unfounded, then you have --
 3 you have the right to say did I not make this
 4 report to the office of special investigations
 5 on whatever day it was, and then make the
 6 argument that subsequent to that, all of these
 7 things happened.
 8 MS. WILLIAMS: No, sir,
 9 because subsequent to that I was already
 10 removed from the school. These -- these
 11 questions regarding salary and -- and
 12 per-session income are important in that if we
 13 have, say, Robert Colon, just because you
 14 mentioned his name before. If Robert Colon
 15 comes in to testify against me, clearly I would
 16 feel that -- that this witness is, in part,
 17 testifying against me because he is motivated,
 18 or he was motivated, to do so, in an effort to
 19 protect his overtime earnings.
 20 THE HEARING OFFICER: Well,
 21 that's an argument you're going to have to
 22 make, but I'm -- I'm not -- I'm not prepared --
 23 there is --
 24 MS. WILLIAMS: Can't --?

15 (Pages 54 to 57)

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1 Natalie Williams - 2-25-2009
 2 THE HEARING OFFICER: -- I'm
 3 not -- as -- as long as the office of special
 4 investigations has received this allegation,
 5 and they've acted on it, I'm not --.
 6 MS. WILLIAMS: Actually --
 7 actually, they received an allegation regarding
 8 some -- someone else.
 9 THE HEARING OFFICER: Oh.
 10 Well then, the answer is -- is that if -- if --
 11 if these people were not the subject of a -- of
 12 a -- of a -- of a -- and now we're getting --
 13 of a report to the -- to the office of
 14 special -- special investigations, then that's
 15 the place to bring it, not here.
 16 MS. WILLIAMS: The point that
 17 I'm trying to make is that any witness --
 18 could -- could I -- could I directly, I
 19 suppose, ask these people what their overtime
 20 earnings were, and what their salary is, as
 21 they come in?
 22 THE HEARING OFFICER: You
 23 can --
 24 MS. WILLIAMS: So rather than

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1 Natalie Williams - 2-25-2009
 2 If there are objections, I will -- I will rule
 3 on it at the time.
 4 But the -- the -- but the
 5 correct forum is the office of special
 6 investigations for this kind of -- of -- of
 7 clarification as to whether or not there's
 8 wrongdoing or not. So, if you haven't
 9 contacted them I would suggest --.
 10 MS. WILLIAMS: Actually, I'm
 11 not even suggesting wrongdoing. I'm just
 12 suggesting that certain people earned a lot of
 13 money in per session, and that due to that,
 14 they had a motivation to do other things.
 15 THE HEARING OFFICER: But
 16 then you're going to have -- then you're going
 17 to have to convince me that -- assuming it's
 18 true, even --
 19 MS. WILLIAMS: Well, the only
 20 way to --
 21 THE HEARING OFFICER: -- that
 22 it's -- and --
 23 MS. WILLIAMS: -- if you
 24 assume it's true, the only way to find out --

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1 Natalie Williams - 2-25-2009
 2 doing a fishing --
 3 THE HEARING OFFICER: -- you
 4 can try it.
 5 MS. WILLIAMS: -- expedition,
 6 it's more --
 7 THE HEARING OFFICER: It's
 8 probably --
 9 MS. WILLIAMS: --
 10 specific --.
 11 THE HEARING OFFICER: -- it's
 12 probably going to objected to as being
 13 irrelevant.
 14 MS. WILLIAMS: I -- I think
 15 it's truly relevant. And I think it's -- it's
 16 specifically tied to the motivation of my
 17 having charges made against me in the first
 18 place.
 19 THE HEARING OFFICER: Well,
 20 you can raise -- you can ask the questions
 21 when -- if and when they appear. I'll make
 22 rulings on the -- I'll make rulings on it
 23 when -- at the time. If there are no
 24 objections, then they'll answer the questions.

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 2 THE HEARING OFFICER: -- and
 3 that -- and that --
 4 MS. WILLIAMS: -- if it's
 5 true is to get the person --
 6 THE HEARING OFFICER: -- no,
 7 no.
 8 MS. WILLIAMS: -- in here.
 9 THE HEARING OFFICER: Well,
 10 let me finish. Assuming it's true that they
 11 earned whatever amount of money in per-session
 12 money, and they didn't do anything wrong, what
 13 is it that they're protecting? The fact that
 14 they didn't do anything wrong?
 15 MS. WILLIAMS: They're
 16 protecting their future per-session earnings.
 17 THE HEARING OFFICER: But
 18 that would assume they were do -- that they had
 19 done something wrong, and that they would lose
 20 it.
 21 MS. WILLIAMS: Just shedding
 22 light on the fact that they were earning the
 23 amounts of money that I suspected --
 24 THE HEARING OFFICER: Okay.

16 (Pages 58 to 61)

1 Natalie Williams - 2-25-2009
 2 MS. WILLIAMS: -- that they
 3 were earning --
 4 THE HEARING OFFICER: Well --
 5 MS. WILLIAMS: -- is
 6 threatening --
 7 THE HEARING OFFICER: --
 8 we'll get -- we'll --
 9 MS. WILLIAMS: -- to them.
 10 THE HEARING OFFICER: --
 11 We'll get to it when we get to it, but at the
 12 moment I'm -- if you have an issue over -- over
 13 these people and the amount of money -- whether
 14 the amounts of money they earned, and whether
 15 this is appropriate or inappropriate, it's a --
 16 it's -- you -- it's a different forum.
 17 Okay. Let's move on.
 18 New York State supervisor
 19 certification for these people. What -- how --
 20 how is that relevant?
 21 MS. WILLIAMS: In short, I
 22 believe that Mr. Rotonno hired people who he
 23 favored, regardless of their true
 24 qualifications for the job. And I would like

1 Natalie Williams - 2-25-2009
 2 information on who was truly certified and
 3 qualified for the jobs that they were holding.
 4 THE HEARING OFFICER:
 5 Typically speaking, when people testify the
 6 question is what are your certifications.
 7 That's typically a question that's raised.
 8 What -- you know, what licenses do you hold?
 9 What certifications do you hold? How long have
 10 you taught? That's going to come out.
 11 MS. WILLIAMS: Actually it
 12 might not come out in the form that I'd like it
 13 because there -- there -- there perhaps was an
 14 A.P. or two who were not truly certified at the
 15 point where Mr. Rotonno put -- had them in
 16 place, and then they later became certified.
 17 THE HEARING OFFICER: Well,
 18 that's what cross-examination is all about.
 19 Okay. Let's move on.
 20 The budget for Kennedy, a
 21 staff list of supervisors. I mean, all of this
 22 is -- again, I -- I -- teacher performance
 23 ratings for Kevin Kent. Who's Kevin Kent?
 24 MS. WILLIAMS: He's a teacher

1 Natalie Williams - 2-25-2009
 2 who was sent -- sent to be a coteacher for me.
 3 But can we go through them one at a time?
 4 THE HEARING OFFICER: Go
 5 ahead.
 6 MS. WILLIAMS: All right.
 7 THE HEARING OFFICER: J.F.K.
 8 budget.
 9 MS. WILLIAMS: All right.
 10 So, for the J.F. Kennedy High School budget
 11 actually relates to the issue that I was
 12 referring to before, that it seems to me -- it
 13 seemed to me that there was an awful lot of
 14 overtime gotten by a certain number of people
 15 at the school. And I -- not only I, but other
 16 people, were noticing that. And that ended up
 17 making us a target for retribution by the
 18 administration. The only way to really prove
 19 that is to get the requested documents that I
 20 previously asked for, and to get the big
 21 picture of what chunk of the school budget
 22 these excessive per sessions took out.
 23 THE HEARING OFFICER: I've
 24 got to tell you, you're asking for things that

1 Natalie Williams - 2-25-2009
 2 have nothing -- that have very little to do
 3 with showing that -- even if all of what you
 4 say is true, that these charges are not --
 5 these charges are not valid charges.
 6 The -- the issue is -- is are
 7 these charges -- are they -- let's -- let's
 8 assume for the moment that the administrators
 9 in the school were getting a significant amount
 10 of per-session money. Let's assume that. And
 11 they didn't do anything wrong.
 12 How does that make you not
 13 guilty of any of these charges?
 14 MS. WILLIAMS: The fact that
 15 I noticed that they were getting all of this
 16 per session caused them to want to retaliate
 17 against me for essentially snooping around.
 18 THE HEARING OFFICER: Well,
 19 but this is -- but if this is -- if this is --
 20 if they didn't do anything wrong, they still
 21 have to prove that these things happened.
 22 MS. WILLIAMS: And I suppose
 23 they'll attempt to. But I'm -- but I'm clearly
 24 trying to indicate that I believe that there

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1 Natalie Williams - 2-25-2009
 2 was an association between my being aware of
 3 these high per-session rates that certain
 4 people received, and the fact that I became
 5 increasingly targeted.
 6 THE HEARING OFFICER: I'm
 7 not -- I'm not persuaded that it's relevant.
 8 What is the list of
 9 supervisors and teachers?
 10 MS. WILLIAMS: Employed at
 11 Kennedy High School.
 12 THE HEARING OFFICER: Yeah.
 13 MS. WILLIAMS:
 14 During --during these certain years. Well,
 15 there was an extreme turnover in the -- in the
 16 staff at Kennedy High School --
 17 THE HEARING OFFICER: Okay.
 18 MS. WILLIAMS: -- during 2005
 19 and 2006. In fact, the bilingual department
 20 itself was -- was dismantled in that time, and
 21 about thirty-three teachers were lost through
 22 that.
 23 THE HEARING OFFICER: Okay.
 24 But what --.

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1 Natalie Williams - 2-25-2009
 2 THE HEARING OFFICER: But
 3 what does that --
 4 MS. WILLIAMS: -- exams.
 5 THE HEARING OFFICER: -- have
 6 to do with these charges?
 7 MS. WILLIAMS: Actually
 8 everything. Because what had -- what occurred
 9 was that it became a New York Times news story,
 10 and the school ended up getting undue
 11 attention. And because of that undue
 12 attention, Mr. Rotonno ended up retaliating by
 13 having a huge shift in the staff. Many staff
 14 members were excessed; a --
 15 THE HEARING OFFICER: But
 16 that --.
 17 MS. WILLIAMS: -- number of
 18 people were sent to the rubber room.
 19 THE HEARING OFFICER: Listen
 20 to me.
 21 MS. WILLIAMS: And
 22 therefore --
 23 THE HEARING OFFICER: I --
 24 I --.

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1 Natalie Williams - 2-25-2009
 2 MS. WILLIAMS: And that a
 3 number of guidance counselors were --
 4 THE HEARING OFFICER: Well,
 5 what does that --
 6 MS. WILLIAMS: -- sent away.
 7 THE HEARING OFFICER: -- what
 8 does that have to do with these charges?
 9 MS. WILLIAMS: These people
 10 were involved in -- there was, in 2005, a
 11 protest arranged by the union chapter leader at
 12 the time, regarding --
 13 MS. JOHN-STULL: Who was
 14 that?
 15 MS. WILLIAMS: -- Maria
 16 Colon.
 17 Regarding a scandal that
 18 occurred at the school. Basically there were
 19 allegations that the principal essentially
 20 admitted to, that the -- the English regents
 21 exam was tampered with. That Ms. Raticia
 22 (phonetic spelling) Ford, who was the new head
 23 of the English department, had arranged to tell
 24 teachers to up the grades on certain --

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1 Natalie Williams - 2-25-2009
 2 MS. WILLIAMS: -- it sort
 3 of -- it does show that --
 4 THE HEARING OFFICER: It --.
 5 MS. WILLIAMS: -- the staff
 6 turned over like, fifty percent during the time
 7 that I myself was removed. And I believe
 8 that --
 9 THE HEARING OFFICER: And --
 10 MS. WILLIAMS: -- I was
 11 removed in part because of this sort of
 12 embroilment and --
 13 THE HEARING OFFICER: It --
 14 MS. WILLIAMS: -- and
 15 protection.
 16 THE HEARING OFFICER: --
 17 it's -- it has -- it -- with -- again, with due
 18 respect, this has nothing to do with these
 19 charges. If -- the union had every opportunity
 20 to represent the staff. There is a whole
 21 process. I'm very familiar too, with --
 22 MS. WILLIAMS: Uh-huh.
 23 THE HEARING OFFICER: -- the
 24 contract. There is a whole process, there's

18 (Pages 66 to 69)

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1 Natalie Williams - 2-25-2009
 2 special complaints, there's a whole process for
 3 the investigation of harassment.
 4 That's not what this --
 5 that's not what this is about. I'm -- I'm
 6 not -- I don't have -- it's not an issue for me
 7 to give you staff lists, but it's not about
 8 that. Whether there was a big turnover in the
 9 staff, let's assume that Rotonno wasn't liked.
 10 Let's assume Rotonno exceeded people. Does
 11 that make -- does that make any of this not
 12 true?
 13 MS. WILLIAMS: Well, what it
 14 does is it establishes a motivation for
 15 charging me with anything in the first place.
 16 THE HEARING OFFICER: Well,
 17 that -- you -- you can -- you're going to have
 18 to raise it in a different way.
 19 MS. WILLIAMS: Uh-huh.
 20 THE HEARING OFFICER:
 21 Supervisory performance ratings are -- are --
 22 they -- if Rotonno testifies you can ask him if
 23 he's ever been rated unsatisfactory, and if the
 24 answer is yes he'll answer it, and if the

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1 Natalie Williams - 2-25-2009
 2 by the staff is not a rating.
 3 MS. WILLIAMS: I understand.
 4 But I do believe that he also had some
 5 difficulties with his supervisors --
 6 THE HEARING OFFICER: Well --
 7 MS. WILLIAMS: -- with -- for
 8 his performance.
 9 THE HEARING OFFICER: -- then
 10 you're going to have to -- you're going to --
 11 you can -- you could subpoena the supervisors.
 12 I'm not. His records are confidential. The
 13 same thing with Kevin Kent's records. These
 14 are confidential matters. I wouldn't give your
 15 records out. I just wouldn't do it. You're
 16 entitled to the privacy of your own records.
 17 MS. WILLIAMS: Uh-huh.
 18 THE HEARING OFFICER: All
 19 right. Item B has been withdrawn.
 20 How many of these people are
 21 going to appear, or how many of these people
 22 are going to be -- be appearing as witnesses?
 23 MS. JOHN-STULL: The
 24 principal is definitely coming. A.P. Shama I'm

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1 Natalie Williams - 2-25-2009
 2 answer is --.
 3 MS. JOHN-STULL: There might
 4 be an objection, because I don't know what the
 5 relevance is of that.
 6 THE HEARING OFFICER: Okay.
 7 Item number eight.
 8 MS. WILLIAMS: Can I -- can I
 9 make a comment on that?
 10 THE HEARING OFFICER: Go
 11 ahead.
 12 MS. WILLIAMS: That's a --
 13 that is absolutely essential to know, because I
 14 would say, in a sense, the administration was
 15 under siege, and they acted poorly to the
 16 attention. And the fact -- well -- well, I'm
 17 not sure it's a fact, but I do know that just
 18 simply amongst the -- the teachers at the
 19 school, Mr. Rotonno received a no-confidence
 20 vote in his leadership --
 21 THE HEARING OFFICER: A
 22 no-confidence --
 23 MS. WILLIAMS: -- because --.
 24 THE HEARING OFFICER: -- vote

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1 Natalie Williams - 2-25-2009
 2 not sure. The former A.P. of science, I'm not
 3 sure. James Cunningham, I'm not sure who that
 4 is. Volkirk (phonetic spelling) will be
 5 coming. Rashid (phonetic spelling) Davis, I'm
 6 not sure.
 7 MS. WILLIAMS: All right.
 8 So -- so, Rotonno and Volkirk you're certain.
 9 MS. JOHN-STULL: Volkirk
 10 right. A.P. of math, this is the first time
 11 I'm hearing that person's name.
 12 THE HEARING OFFICER: And the
 13 last one --?
 14 MS. JOHN-STULL: As a matter
 15 of fact, you know what, Mr. Riegel? You know,
 16 it -- To just kind of diverge, I would like for
 17 this document to be marked as Respondent's
 18 Number -- D.O.E. Number --
 19 THE HEARING OFFICER: This
 20 for me?
 21 MS. JOHN-STULL: -- yes. And
 22 what it -- this document it's the -- it usually
 23 accompanies the discovery. The documents that
 24 would be presented to you, and at the bottom,

19 (Pages 70 to 73)

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1 Natalie Williams - 2-25-2009
 2 the second paragraph, it has a list of the
 3 witnesses the Department intends to call. And
 4 again, it says the Department reserves the
 5 right to add individuals or subtract
 6 individuals from here, and then also,
 7 importantly, is the third paragraph, where we
 8 are seeking demand of witnesses' names and
 9 their contact information and documents that
 10 you intend to --.
 11 THE HEARING OFFICER: And
 12 you -- you don't need -- you don't need to
 13 subpoena these witnesses, because they're
 14 there.
 15 MS. WILLIAMS: Okay. Can I
 16 read it? In fact, I'm just going to skip to
 17 the second, "For now the Department intends to
 18 call as witnesses Principal Anthony Rotonno;
 19 Assistant Principals Robert Colon, Wakta
 20 (phonetic spelling) Shama, Peter Volkirk.
 21 Teachers Rakeesh -- Rakeesha -- Rokeesha
 22 (phonetic spelling) is her name.
 23 MS. JOHN-STULL: Okay.
 24 MS. WILLIAMS: And she is

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 2 we --
 3 MS. WILLIAMS: -- but I would
 4 like those other people that are -- that are
 5 not listed.
 6 THE HEARING OFFICER: -- we
 7 don't even know who they are.
 8 MS. WILLIAMS: Oh, I can tell
 9 you. Who do you want to -- which would you --
 10 would you like --
 11 THE HEARING OFFICER: Well,
 12 she --
 13 MS. WILLIAMS: -- to know
 14 about?
 15 THE HEARING OFFICER: -- she
 16 doesn't know who Cunningham is.
 17 MS. WILLIAMS: Okay. James
 18 Cunningham formerly was an A.P. of security,
 19 and then in the year 2005 he became the A.P. of
 20 the sports programs.
 21 THE HEARING OFFICER: If
 22 you -- if you want him to appear as your
 23 witness, we will summon him.
 24 MS. WILLIAMS: Okay.

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1 Natalie Williams - 2-25-2009
 2 actually, or she was, the A.P. of English at
 3 the time. Amalia Garcia? Okay. That's a
 4 science teacher. Kevin Kent. Rashid Davis.
 5 U.F.T. representative Maria Colon.
 6 Interesting. A custodian. Mike Belad
 7 (phonetic spelling) okay. I will -- Secretary
 8 Linda Faughnan, and foreman Michael Bellotti
 9 (phonetic spelling). Oh, wow. I remember him.
 10 Okay. Importantly, so you -- all of these will
 11 be witnesses?
 12 THE HEARING OFFICER: Yeah.
 13 MS. WILLIAMS: All right.
 14 And so --
 15 THE HEARING OFFICER: And you
 16 don't -- and you --
 17 MS. WILLIAMS: -- we don't
 18 have to double -- we don't have to double up on
 19 it --
 20 THE HEARING OFFICER: --
 21 and --
 22 MS. WILLIAMS: -- but I would
 23 like --
 24 THE HEARING OFFICER: --

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 2 MS. JOHN-STULL: And that
 3 goes for everybody else. Even if there are
 4 people on this list that I choose not to
 5 call --
 6 THE HEARING OFFICER: Or
 7 call.
 8 MS. JOHN-STULL: -- and you
 9 want to call them as your witnesses, Mr. Riegel
 10 will be able to.
 11 THE HEARING OFFICER: I will
 12 direct -- I will direct the Department to
 13 produce them for you.
 14 MS. WILLIAMS: Okay. So --
 15 so that's the list of those people.
 16 And then on the third --
 17 MS. JOHN-STULL: We're not
 18 there yet.
 19 MS. WILLIAMS: -- document
 20 that I produced, though, there's a few more
 21 people.
 22 MS. JOHN-STULL: Well, Mr.
 23 Riegel, would you be directing them to --
 24 THE HEARING OFFICER: No, I

20 (Pages 74 to 77)

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 2 will --
 3 MS. JOHN-STULL: -- directing
 4 us to --?
 5 THE HEARING OFFICER: -- to
 6 ask them appear, and they -- if they -- if they
 7 choose to they can. If they -- if they choose
 8 not to, they can as well.
 9 MS. JOHN-STULL: Right.
 10 THE HEARING OFFICER: I -- I
 11 can't compel them.
 12 MS. JOHN-STULL: Okay.
 13 THE HEARING OFFICER: It's --
 14 I'm not a judge.
 15 MS. JOHN-STULL: And I
 16 cannot -- we --.
 17 THE HEARING OFFICER: In
 18 other words, even -- just so you under --
 19 understand something.
 20 MS. WILLIAMS: Yeah.
 21 THE HEARING OFFICER: If I
 22 issue a subpoena --
 23 MS. WILLIAMS: Uh-huh.
 24 THE HEARING OFFICER: -- I'm

1 Natalie Williams - 2-25-2009
 2 not a judge. I have no enforcement power.
 3 They can appear or not appear.
 4 MS. WILLIAMS: Uh-huh.
 5 THE HEARING OFFICER: It's
 6 the same way as if -- if I ask Ms. John-Stull
 7 to contact the school and say that you are
 8 asking that these people appear to testify as
 9 part of your defense. They can choose to or
 10 choose not to, that's up to them.
 11 MS. WILLIAMS: Uh-huh.
 12 THE HEARING OFFICER: But
 13 we're don't have to go through paperwork. We
 14 can just tell them that you're asking them to
 15 appear, and if they choose to okay, and if not
 16 then -- okay.
 17 Let's go on to number three.
 18 MS. WILLIAMS: So you don't
 19 need explanation on anybody else?
 20 THE HEARING OFFICER: Nope.
 21 MS. JOHN-STULL: Nope.
 22 MS. WILLIAMS: Okay.
 23 MS. JOHN-STULL: Okay.
 24 THE HEARING OFFICER:

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 2 Additional copy of your personnel file. If
 3 you've got -- if you've it, why do you need
 4 another copy?
 5 MS. WILLIAMS: Because I
 6 believe that many documents are missing from
 7 the personnel file. I received it originally
 8 from Ms. Winterbaum (phonetic spelling), in
 9 a -- in a -- in a little packet. And she said
 10 that the school needed to go through loops, she
 11 had to sign something, and she had to pick it
 12 up at a certain time.
 13 THE HEARING OFFICER: Right.
 14 MS. WILLIAMS: It was
 15 Xeroxed, and maybe because it was Xeroxed it
 16 doesn't appear to be as thick as it was --
 17 as -- as the original copies were, because the
 18 Xeroxes might be slicker, flatter. But anyway
 19 I -- I reported to her immediately, upon
 20 feeling the weight of it, that this is awfully
 21 thin for my employee file, because I've been
 22 there for twelve years, almost twelve years.
 23 And mind you, the last year there were an awful
 24 lot of letters going back and forth. I would

1 Natalie Williams - 2-25-2009
 2 estimate over a hundred letters went back and
 3 forth. And so, when I got this relatively thin
 4 packet, I suspected that something was awry.
 5 And so, upon looking into the
 6 packet, I did notice that there were some
 7 documents that I would expect to be there that
 8 weren't. Letters generally that move toward my
 9 commendation, and there were specific letters
 10 of recommendation, and award announcements that
 11 were not there. Subsequent to that I gave the
 12 file to Mr. Rubinstein, who, you know,
 13 reorganized it and reshuffled it to -- to his
 14 needs, for his -- for the organization of -- of
 15 his case. And because of that, I'm not quite
 16 sure what was originally there, so --.
 17 THE HEARING OFFICER: Did it
 18 ever pass through your hands?
 19 MS. WILLIAMS: It did.
 20 THE HEARING OFFICER: It did?
 21 MS. WILLIAMS: It did. But
 22 again -- but I ended up giving him all the
 23 documents. I'm not saying that they're --
 24 THE HEARING OFFICER:

1 Natalie Williams - 2-25-2009
 2 She's --
 3 MS. WILLIAMS: -- not there.
 4 THE HEARING OFFICER: --
 5 she's appearing -- she's appearing pro se.
 6 Would you ask the school to produce another
 7 copy of the file?
 8 MS. JOHN-STULL: Yeah.
 9 THE HEARING OFFICER: I know
 10 it's an imposition.
 11 MS. JOHN-STULL: That's not a
 12 problem.
 13 THE HEARING OFFICER: Have
 14 them do it.
 15 MS. JOHN-STULL: I
 16 understand.
 17 THE HEARING OFFICER: Okay.
 18 Item one is -- is -- is granted. Item two
 19 we've already dealt with.
 20 MS. WILLIAMS: Okay. And
 21 this is the one on a separate sheet. Can we
 22 look at -- look at the separate sheet just to
 23 make sure that there's no overlap? Exhibit B.
 24 Okay. I apologize, because I had -- I was

1 Natalie Williams - 2-25-2009
 2 using a computer program, and it kept on
 3 putting these things on the side. All right.
 4 So --.
 5 MS. JOHN-STULL: So, now
 6 we're no longer on page one? We're going
 7 to --?
 8 MS. WILLIAMS: We're -- now
 9 we're going to Exhibit B, which is referenced
 10 on page one of Respondent Three.
 11 MS. JOHN-STULL: Okay.
 12 MS. WILLIAMS: All right.
 13 And basically there is a list of these specific
 14 demands on a separate sheet.
 15 THE HEARING OFFICER: I'm not
 16 giving you this. It's really -- it's really --
 17 I -- I'm -- and I'm telling you frankly, this
 18 is -- you've made -- you've shown no
 19 connection, other than your suspicion that
 20 maybe they got overtime pay, or they got
 21 per-session money, that they didn't do anything
 22 wrong, but this then becomes the basis for --.
 23 MS. WILLIAMS: No -- well,
 24 can -- can I continue? Because these are

1 Natalie Williams - 2-25-2009
 2 different. This is a different set of people
 3 entirely. These are people who were -- who
 4 were involved in my arrests, which I contend
 5 and as the court support were -- I contended
 6 that they were false arrests, and I never
 7 should have been arrested in the first place,
 8 and that it was actually a setup. But these
 9 people were involved in my arrest: Ms. Gloria
 10 White and Mr. Penora (phonetic spellings) were
 11 school safety agents at the time, were involved
 12 in my first arrest outside J.F. Kennedy High
 13 School, when I appeared for open school night.
 14 And the other people below
 15 are Sergeant Giglovich and Police Officer Mario
 16 Pedia (phonetic spellings) who were involved in
 17 a summons of me --.
 18 MS. JOHN-STULL: They're not
 19 even with -- they're not --
 20 THE HEARING OFFICER: Yeah,
 21 they're not --
 22 MS. JOHN-STULL: -- on the
 23 payroll.
 24 THE HEARING OFFICER: --

1 Natalie Williams - 2-25-2009
 2 they're not even department employees. How are
 3 they -- how is she supposed to get the salary
 4 of -- of a police sergeant and a police
 5 officer?
 6 MS. WILLIAMS: FOIL?
 7 MS. JOHN-STULL: You
 8 could --.
 9 MS. WILLIAMS: I could do it.
 10 MS. JOHN-STULL: Yeah.
 11 THE HEARING OFFICER: You can
 12 FOIL any --
 13 MS. WILLIAMS: But -- but
 14 base --
 15 THE HEARING OFFICER: -- you
 16 can FOIL any of this.
 17 MS. WILLIAMS: -- but -- but
 18 basically, the reason that I'm asking for this
 19 information is that I believe that these people
 20 were rewarded for participating in my false
 21 arrest.
 22 THE HEARING OFFICER: Well,
 23 then you can -- you're going to -- you're going
 24 to have to FOIL the information --

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1 Natalie Williams - 2-25-2009
 2 MS. WILLIAMS: Can --
 3 THE HEARING OFFICER: -- and
 4 then --
 5 MS. WILLIAMS: -- can we
 6 move --
 7 THE HEARING OFFICER: -- make
 8 the argument.
 9 MS. WILLIAMS: -- can we move
 10 down to the next one, which is -- all right.
 11 What's the word? Appointed as the track coach,
 12 the girls' track coach --
 13 THE HEARING OFFICER: Right.
 14 MS. WILLIAMS: -- during
 15 2000 -- 2004 I applied; 2005 I was accepted to
 16 be the -- the track coach. I started working
 17 with Coach Kushrani (phonetic spelling) who
 18 was -- who was coaching the boys' team. And
 19 basically what -- what occurred is that I
 20 coached -- I coached along with Mr. -- Mr.
 21 Kushrani for approximately four weeks, and
 22 never received any recognition as the track
 23 coach. I then --
 24 THE HEARING OFFICER: And --

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1 Natalie Williams - 2-25-2009
 2 MS. WILLIAMS: -- found out
 3 that Ms. Jankowski (phonetic spelling) suddenly
 4 was being placed as the girls' track coach.
 5 THE HEARING OFFICER: This
 6 is -- has nothing to do with the charges.
 7 Let's move on.
 8 MS. WILLIAMS: Can we go to
 9 Exhibit B? Demands for per-session pay for
 10 certain administrators.
 11 THE HEARING OFFICER: You've
 12 already asked that, and I told you no.
 13 MS. WILLIAMS: Well, in this
 14 case, there's a little bit more suspicion going
 15 on.
 16 THE HEARING OFFICER: That's
 17 suspicion --
 18 MS. WILLIAMS: Well,
 19 actually, I will --
 20 THE HEARING OFFICER:
 21 You're --.
 22 MS. WILLIAMS: -- prove the
 23 facts here.
 24 THE HEARING OFFICER: You're

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1 Natalie Williams - 2-25-2009
 2 going to --?
 3 MS. WILLIAMS: I'm going to
 4 prove a fact here, and that is that Mr. Ali,
 5 also known as, Musa, I think that's his
 6 official name, Shama, and Wakti Shama are
 7 related. They're brother and sister. In
 8 fact --.
 9 THE HEARING OFFICER: So why
 10 do you need a salary and per-session money?
 11 MS. WILLIAMS: Well --.
 12 THE HEARING OFFICER: Shama's
 13 is going to testify.
 14 MS. WILLIAMS: Okay. So I
 15 can ask her directly. And what about her
 16 brother?
 17 THE HEARING OFFICER: You can
 18 ask her if she has a brother.
 19 MS. WILLIAMS: I don't know
 20 if she'll know exactly how much he -- he made.
 21 THE HEARING OFFICER: Doesn't
 22 matter. How much he makes is not relevant. It
 23 really isn't. You may --.
 24 MS. WILLIAMS: Well, I think

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 2 that that -- Mr. -- Mr. Shama ended up being
 3 the person who was appointed to be the science
 4 A.P. And I made issues with that, in writing,
 5 because he has a music degree. And he was
 6 appointed to be the head of the science
 7 department, so I publicly expressed that, and I
 8 do strongly believe that there was retaliation
 9 on his part --
 10 THE HEARING OFFICER:
 11 Well --.
 12 MS. WILLIAMS: -- because of
 13 that.
 14 MS. JOHN-STULL: You know
 15 what? With all due respect, I have to say to
 16 you that I have to agree with Mr. Riegel, which
 17 is, you know, what do these -- what -- first of
 18 all, your mere suspicion, like he said, there's
 19 this phrase or term that we use that's called a
 20 fishing expedition. And he will not just order
 21 us to turn over documents, especially of such a
 22 private nature, based on your mere suspicion.
 23 And again, you know, just
 24 thinking about these charges, what does any of

23 (Pages 86 to 89)

1 Natalie Williams - 2-25-2009
 2 this have to do with these specific
 3 allegations? If we, the Department of
 4 Education, can prove that on October 6th you
 5 did such and such, on October 28th, and you
 6 know, and -- and prove all of the allegations.
 7 I don't understand -- we don't understand what
 8 is it that somebody's salary -- how does it
 9 relate to the charges?
 10 MS. WILLIAMS: The fact that
 11 these people are earning sometimes in excess of
 12 thirty thousand dollars per year in per-session
 13 income.
 14 THE HEARING OFFICER: Unless
 15 they did something --
 16 MS. WILLIAMS: And it creates
 17 a motivation on their part to --
 18 THE HEARING OFFICER:
 19 Unless --
 20 MS. WILLIAMS: -- remove --
 21 THE HEARING OFFICER: --
 22 unless they were covering up wrongdoing -- and
 23 they --
 24 MS. JOHN-STULL: And they're

1 Natalie Williams - 2-25-2009
 2 not the ones that brought the charges.
 3 THE HEARING OFFICER: -- and
 4 they -- and then if there's no evidence of
 5 wrongdoing, and there's no evidence of a
 6 cover-up of wrongdoing, then they are not
 7 protecting anything. All they're doing is
 8 doing what they're permitted to do under the
 9 regulations.
 10 If you can show that there is
 11 wrongdoing on their part, it has to come
 12 through someplace else. I am not -- I am not
 13 the person who sits in judgment of whether they
 14 did anything wrong.
 15 MS. JOHN-STULL: And the
 16 other thing is -- I mean, it sounds like -- if
 17 you're saying you have proof, you have
 18 information, and their earning was legitimate,
 19 it sounds like there's wrongdoing on your part,
 20 because how is it that you learned of this
 21 private information? Because what they're
 22 earning, their salaries and things of that
 23 nature, I would think that it's not public
 24 information.

1 Natalie Williams - 2-25-2009
 2 MS. WILLIAMS: Well, ma'am, I
 3 simply entered a new world when I became the
 4 track coach, and stayed much later because I
 5 was coaching, and got to observe the people who
 6 were staying later, and got to see their time
 7 cards as they were punching out. And that
 8 started to note that these people were making a
 9 heck of a lot of side money. And certain
 10 people were and certain people weren't, and
 11 actually I ended up being one of the people who
 12 wasn't.
 13 THE HEARING OFFICER: All
 14 right.
 15 MS. WILLIAMS: And I believe
 16 that that was in effect --.
 17 THE HEARING OFFICER: But
 18 there is a -- there is a process --
 19 MS. WILLIAMS: Uh-huh.
 20 THE HEARING OFFICER: -- for
 21 redress. If you weren't getting paid what you
 22 were supposed to get paid, there's a -- there's
 23 a grievance process under the collective
 24 bargaining agreement. If these people did

1 Natalie Williams - 2-25-2009
 2 something that shouldn't have been done,
 3 there's an office established to investigate
 4 the allegations of wrongdoing. It's not here.
 5 It's --.
 6 MS. WILLIAMS: I'm just --
 7 I'm just saying that there's a -- was an
 8 underlying motivation to --
 9 THE HEARING OFFICER:
 10 Well --.
 11 MS. WILLIAMS: -- target, get
 12 rid of, punish, whatever word you --
 13 THE HEARING OFFICER: Well,
 14 you --
 15 MS. WILLIAMS: -- want to
 16 use.
 17 THE HEARING OFFICER: --
 18 okay. But it's -- it's not -- as -- as
 19 these -- as these are drawn, and I -- and
 20 you're representing yourself. And I'm -- and
 21 I'm trying to be as patient as I can, because
 22 you don't understand -- you -- you don't --
 23 this is not what you do for a living. But
 24 there's got to be a -- there's got to be a

1 Natalie Williams - 2-25-2009
 2 direct relationship with what you're asking
 3 for, and something that is a demonstrable basis
 4 for the connection. To simply think that
 5 someone made a lot of money on -- on per
 6 session, and they didn't do anything wrong, and
 7 that becomes a basis for their wanting to cover
 8 something up, doesn't -- it doesn't rise to the
 9 level of -- of logic. What are they covering
 10 up? The fact that they didn't do anything
 11 wrong?
 12 MS. WILLIAMS: They were --
 13 THE HEARING OFFICER: If
 14 they're entitled --
 15 MS. WILLIAMS: -- they
 16 were --
 17 THE HEARING OFFICER: -- to
 18 that money.
 19 MS. WILLIAMS: -- well, they
 20 were -- but they would prefer to keep it
 21 quiet --
 22 THE HEARING OFFICER:
 23 Well --.
 24 MS. WILLIAMS: -- so as to

1 Natalie Williams - 2-25-2009
 2 keep it going.
 3 MS. JOHN-STULL: And we're
 4 going to keep it quiet too, because it's not
 5 relevant to your charges.
 6 THE HEARING OFFICER: I mean,
 7 it -- a -- you can't -- I'm not -- I'm not
 8 going to compel them to give up confidential
 9 information if there's no evidence of
 10 wrongdoing. Supposing they made a hundred
 11 thousand dollars a year? FOIL it; if you want
 12 to make an issue over it, do it, but it --
 13 it -- but to me, unless -- unless there is a
 14 direct connection between your being aware of
 15 their doing something wrong, and they're -- and
 16 they're covering that up by trying to fire you,
 17 okay. I can --
 18 MS. WILLIAMS: Uh-huh.
 19 THE HEARING OFFICER: -- I
 20 can deal with that. But until you show me that
 21 they did anything wrong, I'm not -- I'm not
 22 going to give up -- I'm not going to compel
 23 them to give up what is confidential
 24 information.

1 Natalie Williams - 2-25-2009
 2 MS. WILLIAMS: Okay. Well,
 3 we get a little bit closer or warmer to people
 4 who, quote, unquote, "might have done something
 5 wrong," because here we're talking about an
 6 administrators, Anastasia Tovar (phonetic
 7 spelling) and --
 8 THE HEARING OFFICER: Might
 9 have done.
 10 MS. WILLIAMS: -- Raticia
 11 Ford --.
 12 THE HEARING OFFICER: Listen
 13 to what you said.
 14 MS. WILLIAMS: Uh-huh. Might
 15 have --
 16 THE HEARING OFFICER: Might
 17 have --
 18 MS. WILLIAMS: -- done --
 19 uh-huh.
 20 THE HEARING OFFICER: -- done
 21 something wrong.
 22 MS. WILLIAMS: Yeah, well --
 23 well, can I finish the sentence though?
 24 Because it was indeed proven, and we could have

1 Natalie Williams - 2-25-2009
 2 the testimony directly from Ms. Ford, that she
 3 did indeed instruct the teachers to change the
 4 grades on the --.
 5 THE HEARING OFFICER: Was
 6 there any -- was --?
 7 MS. WILLIAMS: And there was
 8 a state investigation.
 9 THE HEARING OFFICER: And
 10 what happened with it?
 11 MS. WILLIAMS: Pretty much
 12 they got away with it.
 13 THE HEARING OFFICER: Oh, so
 14 there was no -- so, there was -- look at --
 15 look at what you want me to do.
 16 MS. WILLIAMS: Uh-huh.
 17 THE HEARING OFFICER: You
 18 want me to -- you want me to infer that someone
 19 is guilty of something. Turn the tables
 20 around. Should somebody -- if somebody comes
 21 in here and says, you know what, I think
 22 that -- I think that Natalie Williams is guilty
 23 of whatever, and -- but it went to court and
 24 the court found her not guilty, but she's

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1 Natalie Williams - 2-25-2009
 2 really guilty. I know she's really guilty, so
 3 you should find her guilty. I'm not going to
 4 do that.
 5 If there was an investigation
 6 by the state, an independent agency, and they
 7 said that they did nothing wrong -- that they
 8 didn't do anything wrong, I'm not going to find
 9 that they did anything wrong. I'm not going to
 10 do it. It's -- it's fundamental fairness; it's
 11 fundamental due process. If they did something
 12 wrong, if they are charged with doing something
 13 wrong, they have to defend themselves. If they
 14 defend themselves satisfactorily, it's over.
 15 If they are found guilty, then you have a
 16 record of them doing something wrong. But I'm
 17 not --.
 18 MS. JOHN-STULL: And -- and
 19 even that being the case, you still have to
 20 prove relevance to --
 21 THE HEARING OFFICER: Well,
 22 that's --
 23 MS. JOHN-STULL: -- the
 24 charges.

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1 Natalie Williams - 2-25-2009
 2 because then I become your representative to
 3 them. My purpose is to remain -- to remain
 4 neutral. I don't have anything to do with who
 5 gets assigned to cases that Ms. John-Stull
 6 gets. I don't want to know. And as a matter
 7 of fact I don't even -- I didn't even know that
 8 your case was coming up until we completed the
 9 other one, and I thought that there was another
 10 one coming next, and -- and Ms. John-Stull said
 11 no, the next on the list is Natalie Williams.
 12 And other than the
 13 communications I got, when I walked in the room
 14 today, I didn't have this -- I had nothing. I
 15 knew nothing what the -- about the charges. I
 16 walked in with a blank piece of paper and
 17 that's where we begin. And I -- I want it to
 18 stay that way. I will not interact with --
 19 with Sandner or anybody else. You have your
 20 rights under the -- as a member of the U.F.T.,
 21 and if there is a -- if there is an issue I
 22 suggest you go to the U.F.T. and let the U.F.T.
 23 intercede with NYSUT for you. But I cannot.
 24 We've spoken about --

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1 Natalie Williams - 2-25-2009
 2 THE HEARING OFFICER: --
 3 right, but supposing -- supposing --
 4 supposing -- supposing Natalie Williams was the
 5 person who blew the whistle on them. Supposing
 6 she were a whistle blower. And then it turns
 7 out that it was right. Then you can say, well,
 8 you know what? This is the -- there was --
 9 there was retaliation. But A, she wasn't the
 10 whistle blower, and B, there wasn't a finding
 11 of guilt.
 12 Other than that, your -- your
 13 argument is perfect.
 14 Let's move on, please.
 15 MS. WILLIAMS: Okay. Just
 16 for the record Anastasia Tovar is the math
 17 A.P. and similar allegations were made against
 18 her, so --.
 19 THE HEARING OFFICER: Okay.
 20 Item four. I have no ability to intervene with
 21 NYSUT. I -- I just don't do it. I just
 22 don't -- I don't have the ability. As a matter
 23 of fact, it's almost -- it would almost be a
 24 violation of the -- of the canon of ethics,

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1 Natalie Williams - 2-25-2009
 2 MS. JOHN-STULL: Number five.
 3 THE HEARING OFFICER: --
 4 number five. There is no adjournment, because
 5 there is no appointment of a NYSUT -- NYSUT
 6 attorney. The -- the -- the reason that I --
 7 the reason that I e-mailed you as early as I
 8 did was in -- in the second paragraph.
 9 (The hearing was
 10 interrupted.)
 11 THE HEARING OFFICER: In the
 12 second paragraph, and this was February 11th, I
 13 encouraged you to get alternate counsel as soon
 14 as possible.
 15 MS. WILLIAMS: Uh-huh.
 16 THE HEARING OFFICER: So that
 17 hasn't happened, so I have no -- there's no
 18 reason to -- to delay.
 19 We've spoken about the
 20 subpoena of the administrators.
 21 (Off-the-record discussion)
 22 MS. WILLIAMS: So, I would
 23 request that to subpoena the security guards,
 24 White and Penora.

26 (Pages 98 to 101)

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1 Natalie Williams - 2-25-2009
 2 THE HEARING OFFICER: Which
 3 ones?
 4 MS. WILLIAMS: Gloria White
 5 and Louis (phonetic spelling) Penora. They
 6 were involved in my arrest on October 27th.
 7 THE HEARING OFFICER: You
 8 can -- same thing. If you want them I will --
 9 I will ask Ms. John-Stull to request their
 10 appearance.
 11 MS. WILLIAMS: Please.
 12 THE HEARING OFFICER: If they
 13 chose to that's -- that's their -- you know,
 14 they can do so. If they choose not to, then
 15 they will notify us in due course.
 16 MS. JOHN-STULL: Who are
 17 these people?
 18 MS. WILLIAMS: They're school
 19 security.
 20 MS. JOHN-STULL: Where are
 21 they -- where are they listed?
 22 MS. WILLIAMS: It says
 23 Exhibit B, list of persons to be subpoenaed.
 24 MS. JOHN-STULL: Okay.

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1 Natalie Williams - 2-25-2009
 2 these people are not at the school, if they're
 3 no longer at the school -- first of all, I
 4 don't think it's -- you know, I'm mindful that
 5 Ms. Williams is preparing pro se, and -- and
 6 it's not like she's an attorney who is
 7 appearing pro se, but at the same time, I don't
 8 think it's our obligation to have to secure
 9 these witnesses, because they're not D.O. --
 10 within the D.O.E. control.
 11 With that being said, if
 12 they're still at the school I have no objection
 13 to reaching out to them, or having the
 14 principal reach out to them. But if they're
 15 someplace else, I don't think it's our position
 16 to have to -- our --
 17 THE HEARING OFFICER: All you
 18 need --
 19 MS. JOHN-STULL: --
 20 responsibility to --
 21 THE HEARING OFFICER: -- all
 22 you need --
 23 MS. JOHN-STULL: --track them
 24 down.

Page 103

1 Natalie Williams - 2-25-2009
 2 MS. WILLIAMS: Subpoena
 3 S.S.A. Gloria White and S.S.A. Louis Penora as
 4 witnesses.
 5 THE HEARING OFFICER: It's
 6 there.
 7 MS. JOHN-STULL: I see it.
 8 So now, what is it that I need to do, Mr.
 9 Riegel?
 10 THE HEARING OFFICER: When
 11 we -- are -- you're going to want them as -- as
 12 your witnesses?
 13 MS. WILLIAMS: Yes.
 14 THE HEARING OFFICER: Okay.
 15 When we get to -- when we get to the close of
 16 your case, you can, along with whoever else may
 17 be on the list, you can -- you can notify the
 18 school that Ms. Williams is asking that they --
 19 that they testify, and that they -- they have
 20 the right to appear or not appear, depending
 21 upon what they want to do, based upon their
 22 determination.
 23 MS. JOHN-STULL: And just so
 24 that Ms. -- Ms. Williams understands, that if

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1 Natalie Williams - 2-25-2009
 2 THE HEARING OFFICER: -- all
 3 you -- all you need to do is -- is contact the
 4 school. And the school will convey to them
 5 that this request, it is the same as their
 6 being given a subpoena. They can either honor
 7 the subpoena or not honor the subpoena. If
 8 they -- if they appear I would just want to
 9 know in advance that they're coming in.
 10 MS. JOHN-STULL: Okay.
 11 THE HEARING OFFICER: So that
 12 we -- so that -- so that she can plan what
 13 she -- what she wants to do when -- you know,
 14 assuming they come, she needs to plan on what
 15 she wants to do. If they're not going to come,
 16 she needs to know that they're not planning on
 17 appearing.
 18 MS. JOHN-STULL: Then in
 19 terms of documents, Mr. Riegel, because I'm not
 20 finished photocopying my document, and I know
 21 that we're scheduled to start next Wednesday on
 22 the 4th, and I was thinking that the Department
 23 would just have -- do opening on that day, and
 24 whatever else -- other preliminary matters

27 (Pages 102 to 105)

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1 Natalie Williams - 2-25-2009
 2 there might be, and then we start our case on,
 3 I think, it's March 11th.
 4 THE HEARING OFFICER: Let me
 5 get my calendar out, and we can -- we can
 6 review the dates on the record.
 7 MS. JOHN-STULL: Okay.
 8 MS. WILLIAMS: Okay. Are we
 9 through with all -- all the points here --
 10 THE HEARING OFFICER: Yes.
 11 MS. WILLIAMS: -- on my
 12 letter?
 13 Sir, can we return to number
 14 seven?
 15 THE HEARING OFFICER: Which
 16 is --?
 17 MS. WILLIAMS: I noticed that
 18 the hearing dates include April 1st, 2009.
 19 THE HEARING OFFICER: Right.
 20 MS. WILLIAMS: I request that
 21 that this date be moved, as Ms. Williams is
 22 scheduled to take a course out of town on that
 23 day.
 24 THE HEARING OFFICER: I'm

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1 Natalie Williams - 2-25-2009
 2 call potential witnesses. I -- I know you
 3 said -- stated something like, if I need to get
 4 a student witness, that I should give a list to
 5 the Board of Education.
 6 MS. JOHN-STULL: A letter.
 7 THE HEARING OFFICER: A
 8 letter.
 9 MS. WILLIAMS: A letter.
 10 Should I -- should address the letter myself?
 11 THE HEARING OFFICER: Yeah.
 12 MS. WILLIAMS: Okay. It
 13 might be -- I'm searching for a number of
 14 students, so it might be copious.
 15 THE HEARING OFFICER: Just --
 16 if students are there, and they have the --
 17 have the address, they will then mail the
 18 letter to the student's home.
 19 MS. WILLIAMS: And if the
 20 students are no longer there?
 21 THE HEARING OFFICER: They
 22 can mail them to the last known address, if
 23 they -- you know, whatever -- whatever address
 24 they have.

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1 Natalie Williams - 2-25-2009
 2 afraid I can't do it. Those dates have been
 3 preset for the year.
 4 MS. WILLIAMS: Okay. So the
 5 answer's no. Okay. So, I'll cancel that
 6 course.
 7 THE HEARING OFFICER: Okay.
 8 Today is the 25th. On -- we have March 4th.
 9 We have March 18th. Not March 16th.
 10 MS. JOHN-STULL: March 11th.
 11 THE HEARING OFFICER: March
 12 4th. Yes, March 11th, March 18th, March 25th.
 13 Those are the dates in March. We may be -- we
 14 may be finished by April 1st in any event,
 15 so -- depending upon numbers of witnesses and
 16 all the rest. So, I wouldn't cancel the course
 17 quite yet, until we see where we are, because
 18 that four sessions -- depending upon how many
 19 witnesses you have, and how many witnesses you
 20 have that will be appearing on your behalf, we
 21 may be done in four weeks.
 22 MS. WILLIAMS: Okay. I have
 23 one other question. I think it was addressed
 24 in the top here. Basically I would like to

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1 Natalie Williams - 2-25-2009
 2 MS. WILLIAMS: Okay. Because
 3 I'm trying to search for student witnesses.
 4 Can I ask you, am I still
 5 barred from contacting the students at this
 6 point? Even though they might have -- may be
 7 twenty-two years old and fully adult?
 8 THE HEARING OFFICER: No. If
 9 you can -- you want to -- if you -- if you know
 10 where they are, and you want to reach to them
 11 and they want to talk to you, I'm not going
 12 to -- I'm not the -- I'm not going to -- I'm
 13 not going to give you the information with
 14 which you can find addresses and phone numbers.
 15 MS. WILLIAMS: Uh-huh.
 16 THE HEARING OFFICER: But if
 17 you have a student who you know where he or she
 18 is, and you want to reach out to them, you --
 19 MS. WILLIAMS: Uh-huh.
 20 THE HEARING OFFICER: -- can
 21 do it.
 22 MS. WILLIAMS: Is this -- is
 23 this ban still extant now that the children are
 24 over eighteen? Just generally, if I bumped

28 (Pages 106 to 109)

Page 110

1 Natalie Williams - 2-25-2009
 2 into them --
 3 THE HEARING OFFICER: If you
 4 know --
 5 MS. WILLIAMS: -- out on the
 6 street, or --
 7 THE HEARING OFFICER: -- --
 8 if you know where --
 9 MS. WILLIAMS: -- you know?
 10 THE HEARING OFFICER: -- they
 11 are -- if you know where they are, yes. And if
 12 you -- if you need addresses, then the -- the
 13 Department will send letters to their last
 14 known addresses.
 15 MS. WILLIAMS: Uh-huh. No,
 16 but I'm just generally saying if I'm in the
 17 Bronx and I go in a grocery store --
 18 THE HEARING OFFICER: And you
 19 see them?
 20 MS. WILLIAMS: -- and see
 21 a --
 22 THE HEARING OFFICER: Of
 23 course.
 24 MS. WILLIAMS: -- a former

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1 Natalie Williams - 2-25-2009
 2 adults.
 3 MS. WILLIAMS: Uh-huh.
 4 THE HEARING OFFICER: If they
 5 want to talk to you they can talk to you.
 6 MS. WILLIAMS: Right.
 7 THE HEARING OFFICER: If they
 8 don't want to talk to you they don't want to
 9 talk to you.
 10 MS. WILLIAMS: Right. Okay.
 11 So that is that.
 12 The only -- the only people
 13 who might be left at the school at this time
 14 are children that I had as freshmen, because
 15 that -- I've been away from school for three
 16 and a half years.
 17 THE HEARING OFFICER: Right.
 18 MS. WILLIAMS: So,
 19 effectively, they might be seniors now. So
 20 I'll concentrate my efforts on -- on asking for
 21 students who were formerly my freshmen. But
 22 the pool of people will still be small.
 23 When can I provide this
 24 information to --?

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1 Natalie Williams - 2-25-2009
 2 student --?
 3 THE HEARING OFFICER: There's
 4 no court order barring you on what -- there's
 5 no court order saying you can't talk to those
 6 people. What you have is -- is that you were
 7 precluded from contacting them either on school
 8 grounds, or from getting information as to
 9 where they live and -- and what their addresses
 10 are.
 11 MS. WILLIAMS: Well, Ms.
 12 Scalena's (phonetic spelling) letter
 13 specifically said -- specifically said that I'm
 14 prohibited, or -- or that I was not to contact
 15 students in person or by e-mail. Those were
 16 her specific prohibitions. And I've complied
 17 with them. However at this point I would like
 18 to find student witnesses.
 19 THE HEARING OFFICER: If you
 20 happen to walk into them, no one can stop you.
 21 On the other hand -- particularly if the
 22 students are no longer in the school. If the
 23 students are no longer in the school, if
 24 they've graduated from high school, they're

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1 Natalie Williams - 2-25-2009
 2 THE HEARING OFFICER: Get the
 3 letter prepared, and just -- with the names --
 4 with the names of the students.
 5 MS. JOHN-STULL: How many
 6 students are you thinking of?
 7 MS. WILLIAMS: I don't -- I
 8 actually don't know.
 9 MS. JOHN-STULL: Okay.
 10 Mr. -- okay, yes. I need to make arrangements
 11 to get the documents to Ms. Williams. I notice
 12 that I have a P.O. Box address for you. You
 13 know, if you can come and pick it up. I don't
 14 know --.
 15 MS. WILLIAMS: Okay. Where
 16 would I pick them up?
 17 MS. JOHN-STULL: You can come
 18 here on Friday around midday and pick it up,
 19 pick up the documents.
 20 And to the extent that I have
 21 a copy of her personnel file, I'm going to
 22 start on making a copy of that.
 23 THE HEARING OFFICER: Okay.
 24 MS. WILLIAMS: Okay. So I'll

29 (Pages 110 to 113)

1 Natalie Williams - 2-25-2009
 2 come about lunch time on Friday?
 3 MS. JOHN-STULL: Yes.
 4 MS. WILLIAMS: Okay. And --
 5 and can I have some kind of physical note?
 6 Because I'm actually supposed to be at the
 7 teacher reassignment center, and so for the
 8 days that I come here, for whatever reason I'd
 9 like to have the documentation that --
 10 THE HEARING OFFICER: There
 11 will --
 12 MS. WILLIAMS: -- I did so.
 13 THE HEARING OFFICER: --
 14 usually the NYSUT lawyers do it. I'll
 15 prepare -- I will prepare something for you
 16 which will -- which you can -- which you can
 17 hand in, which will indicate the -- the time --
 18 MS. WILLIAMS: The dates and
 19 times of the hearing.
 20 THE HEARING OFFICER: All
 21 right. Let me just write myself a note.
 22 MS. JOHN-STULL: On the 4th
 23 what time are we meeting?
 24 THE HEARING OFFICER: Okay.

1 Natalie Williams - 2-25-2009
 2 Dates, times of hearings for Ms. Williams.
 3 The time on the 4th, ten
 4 o'clock.
 5 MS. WILLIAMS: Ten o'clock.
 6 Is it going to be the same time consistently
 7 throughout?
 8 THE HEARING OFFICER: No.
 9 Ten o'clock on the 4th.
 10 MS. WILLIAMS: Okay.
 11 THE HEARING OFFICER: One
 12 o'clock on the 11th; one o'clock on the 18th.
 13 MS. WILLIAMS: Uh-huh.
 14 THE HEARING OFFICER: Ten
 15 o'clock on the 25th.
 16 MS. WILLIAMS: Okay. And we
 17 don't know about April yet?
 18 THE HEARING OFFICER: No.
 19 MS. WILLIAMS: Okay.
 20 THE HEARING OFFICER: But
 21 I'll -- as we get closer to the end of March
 22 we'll see where we stand. I don't want --
 23 that's why I'm saying don't cancel that course,
 24 because we may be done by then. If -- if we

1 Natalie Williams - 2-25-2009
 2 are --
 3 MS. WILLIAMS: Uh-huh.
 4 THE HEARING OFFICER: -- then
 5 April 1st is not going to be an issue. And if
 6 we're not then you --
 7 MS. WILLIAMS: Uh-huh.
 8 THE HEARING OFFICER: -- you
 9 can deal with it then; okay?
 10 MS. WILLIAMS: Okay.
 11 THE HEARING OFFICER: All
 12 right. We're adjourned at one twenty-five, and
 13 we will reconvene on March 4th for our next
 14 hearing date.
 15 Thank you all.
 16 And we are off the record.
 17 (The prehearing conference
 18 concluded at 1:25 p.m.)
 19
 20
 21
 22
 23
 24

1 Natalie Williams - 2-25-2009
 2 I, Josh Colburn, do hereby certify that the
 3 foregoing was taken by me, in the cause, at the time
 4 and place, and in the presence of counsel, as stated
 5 in the caption hereto, at Page 1 hereof; that before
 6 giving testimony said witness(es) was (were) duly
 7 sworn to testify the truth, the whole truth and
 8 nothing but the truth; that the foregoing typewritten
 9 transcription, consisting of pages number 1 to 116,
 10 inclusive, is a true record prepared by me and
 11 completed by Associated Reporters Int'l., Inc. from
 12 materials provided by me.
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 14 _____
 15 Josh Colburn, Reporter
 16 _____ Date
 17 rjh/tgmf/plal
 18
 19
 20
 21
 22
 23
 24

1 Natalie Williams - 2-25-2009
 2 ERRATA SHEET
 3 Case: Natalie Williams, File #8,253
 Date: February 25, 2009

4 CORRECTIONS:
 5 Page - line

- 6 _____
- 7 Word or phrase: _____
- 8 Corrected to: _____
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