



Solon City Schools
Administrative Offices
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Joseph V. Regano
Superintendent

May 4, 2018
Via Electronic Delivery
Ed Kline

Re: Notice of Pre-Termination/Loudermill Hearing

Dear Mr. Kline:

This letter serves as formal notice that a pre-termination hearing is scheduled for Thursday, May 10, 2018, at 9:00 a.m. at the Board office. It is my intention to recommend that your employment be terminated for good and just cause pursuant to Ohio Revised Code Section 3319.16 and the terms of the Negotiated Agreement as a result of your unprofessional behavior and misconduct in the educational environment in direct contravention of the terms of the Negotiated Agreement, R.C. § 3319.16, Board Policy, the *Licensure Code of Professional Conduct for Ohio Educators*. My decision to pursue this course of action with the Board is compelled by the Administration's investigation into your alleged conduct as outlined in the letters sent to you and your representatives inviting you to attend investigation meetings to discuss the allegations. Specifically, the Administration investigated allegations that you engaged in unprofessional behavior and misconduct on school property, including:

- 1) **Engaging in inappropriate relations on school grounds and during school hours**: It is alleged that you began a romantic/sexual relationship with a former student ("Former Student A"), and invited the individual to meet you for lunch on school grounds in September, 2016, during school hours. It is alleged that while Former Student A was on school grounds, you requested that she perform oral sex on you, and that Former Student A acquiesced to this request, and then left the building shortly afterwards.
- 2) **Possessing/Maintaining inappropriate images on the District-issued computer**: It is alleged that you have a picture of your genitals on your District-issued computer, and that you also have a video of a woman masturbating on your District-issued computer.
- 3) **Engaging in inappropriate behavior, including unwanted physical contact, while a former student was enrolled as a student in the District**: It is alleged that you pulled the former student (Former Student B) out of class and wrote passes for her to come down to the Band room/office under the pretenses of making copies of music for you. It is also alleged that you repeatedly requested Former Student B to perform various tasks while she was wearing a dress, and that it was a common joke amongst students that you would target female students when they wore dresses and ask them to do various tasks. It is further alleged that you touched/rubbed against Former Student B while she was enrolled in school.

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The above-described misconduct constitutes immorality, willful and persistent violation of reasonable regulations of the Board, and good and just cause for termination. Before I present my recommendation to the Board, I am extending you the opportunity to meet with me to respond and present information as to why I should not recommend your contract be terminated. During the pre-termination hearing (i.e., "Loudermill Hearing"), you will be given a full opportunity to respond to the each of allegations, address the District's evidence, and provide any explanation or defense to that evidence. You will also be provided with a copy of the resolution (including written specifications) I intend to provide to the Board, and will have a full opportunity to respond to the recommended grounds for termination. You are encouraged to consult with a representative of the SEA and to have representation of your choice at the Loudermill Hearing.

You will remain on assignment to home/administrative leave pending the outcome of the pre-termination hearing. While assigned to home, you should continue to be available by phone during the normal work hours should it be necessary to contact you. You, however, are not authorized to be on school property. Should you need access to school property, you must contact me or Fred Bolden, Assistant Superintendent, to obtain authorization and make the necessary arrangements.

Additionally, you are not to have any access remotely or otherwise to the school district computer systems. Any and all school property including but not limited to keys, files, documents, computers, laptops, cell phones or other electronic devices that are in your possession must be returned to me immediately. Further, you are not permitted to have contact with school employees and/or students during this time unless you have been otherwise authorized or directed by me to do so.

If you have any questions concerning the hearing, please do not hesitate to call me.

Sincerely,

A handwritten signature in black ink, appearing to read "Joe Regano". The signature is fluid and cursive, with a long horizontal stroke at the end.

Joe Regano

Superintendent

cc: Fred Bolden, Assistant Superintendent

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