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May 24, 2022

Board Members

Rutherford County Board of Education

2240 Southpark Drive

Murfreesboro, TN 37128

To Whom It May Concern:

I write on behalf of Helen Campbell, an educator with the Rutherford County Board of Education (“the Board”) who is presently suspended from employment. It is my understanding that the Board will consider the charges against Mrs. Campbell in the near future and vote upon whether those charges warrant dismissal.

I write principally to shed light on the nature of the investigation against Mrs. Campbell, so that the Board fully understands not only the charges against her, but also the way these charges were brought to the attention of law enforcement. Mrs. Campbell has requested that I write this letter and has approved its delivery to you.

The information contained in this letter is derived from various sources, including written correspondence from the Rutherford County District Attorney, evidence provided by both the District Attorney and the Board, and the sworn testimony of various Board employees, including Director Bill Spurlock.

The facts of this incident are entangled in a web woven through years of interactions between criminal courts, educational agencies, and various governmental entities. I will not delve into every area in which Mrs. Campbell has significant doubts as to the fairness of the actions levied against her. Instead, I will focus on a mere handful of illustrative examples that will demonstrate that the investigation and actions against Mrs. Campbell have been tainted by the personal goals of retribution of various employees of Rutherford County Schools.

Mrs. Campbell had a Pre-Existing Dispute with Bill Spurlock.

At the time of this alleged abuse, Mrs. Campbell had an existing dispute with Bill Spurlock about the rezoning issues surrounding Walter Hill Elementary. Of note, this alleged abuse occurred on November 4, 2019. *Mrs. Campbell had a previously scheduled meeting with Director Spurlock that same afternoon to discuss this dispute.*

The Investigation Began with Board Employees, Not Law Enforcement.

Perhaps the most peculiar fact about the investigation against Mrs. Campbell for allegedly *physically abusing a student* is that the investigation did not start from a complaint by the parent

of the student. Instead, it began when two county employees conducted an off-duty investigation beyond the scope of any assigned duty and delivered the results directly to Director Bill Spurlock—and only after the previously scheduled meeting mentioned above, through which it became known that Director Spurlock and Mrs. Campbell were at odds over at least one issue.

The SRO Launched a Private Investigation Outside of the Chain of Command.

The investigation into Mrs. Campbell was launched by SRO Erica Brinkley, *who was not even physically present on the day of the alleged assault*, and who claims to have learned of the incident in the days following the incident. Critically, SRO Brinkley claims to have properly reported this incident up the chain of command, both at the Sheriff's Office *and* Central Office.

The SRO Accessed the Video After-Hours and Delivered the Video to David Crim.

Despite reporting the incident up the chain of command, SRO Brinkley returned to the campus after school hours and accessed the surveillance cameras *again*, ultimately imploring her husband to drive directly to the *personal residence* of Safety Director David Crim in the middle of the night for no purpose other than to share the video of the incident with Mr. Crim, who works at the right hand of Director Spurlock. Once her husband arrived at Mr. Crim's home, the SRO recorded the incident on her cell phone and *sent this video of an RCS student directly to her husband using her personal email address*, so that her husband could show David Crim personally.

According to SRO Brinkley, Mr. Crim is a friend of the Brinkleys dating back to when Mr. Crim worked with her husband, Mr. Curtis Brinkley, as School Resource Officers at Oakland High School. It happens that the Oakland High School Principal who served over both Mr. Crim and Mr. Brinkley is Director Bill Spurlock.

The SRO Provided the Video to David Crim for Express Purpose of Reaching Bill Spurlock.

When asked why she took it upon herself, *after reporting the incident up the chain of command*, to conduct her own investigation, contact non-employees, transfer confidential student information to non-employees in the middle of the night, and take this information to the Safety Director at his personal residence, SRO Brinkley only offered the following explanation: "To get it to Spurlock."

It is evident from this unusual chain of custody that SRO Brinkley, her husband, and/or David Crim had explicit instructions to subvert the chain of command, obtain after-hours evidence, and hand it directly to Bill Spurlock.

After Viewing the Video, Bill Spurlock Called Police Without Speaking to Mrs. Campbell and Without Investigating the Facts Surrounding the Relocation.

After receiving the video from his direct report, Mr. Crim, Director Spurlock did not hesitate to send law enforcement to investigate the matter. To that end, Director Spurlock did not speak to any witnesses or staff about the incident. Instead, Director Spurlock summoned law enforcement to investigate the incident *within hours of viewing the video*. Of note, there are conflicting reports of when Director Spurlock claims to have learned of the incident. It is now clear that Director Spurlock or his employees ordered law enforcement to go to Walter Hill Elementary and investigate Mrs. Campbell.

Bill Spurlock Did Not Tell Law Enforcement of Board Policies for Safe Relocation.

As mentioned above, the Rutherford County Board of Education has a *Safe Relocation Policy*, which authorizes educators to relocate students, even using force, in certain circumstances. Critically, whether or not a relocation falls within this policy *depends on the specific facts of the incident*. The Board did not inform any law enforcement officer of this policy. Nor did the Board conduct any investigation to see whether Mrs. Campbell followed or attempted to follow such a policy. Nor did the Board look into the educational background of this student to see whether any prior conduct may increase or decrease the likelihood of physical intervention.

The State Failed to Prove Any Child Abuse at Preliminary Hearing.

The General Sessions Court of Rutherford County held a preliminary hearing to determine if probable cause existed for the charge of *child abuse*. The investigating detective testified and failed to offer any evidence of injury, after which the Court dismissed the charges. Of note, the State has *never* produced any proof of injury to the child in question. Despite this, the State again brought charges to the Grand Jury, bringing, in part, the same allegations against her, and law enforcement arrested Mrs. Campbell once again to face trial for these charges.

Mrs. Campbell Settled the Criminal Matters Without Any Admission of Wrongdoing.

Through representation, Mrs. Campbell raised the factual issues contained herein, and numerous other facts and circumstances, to the District Attorney and negotiated a *No Contest Plea* to the criminal charges against her, through which she disputed the truth of the underlying facts but agreed that the plea was in her best interests given the evidence that had been organized against her. Mrs. Campbell is also under *Judicial Diversion*, through which these charges will be erased from her record after the successful completion of a non-reporting probation period.

Mrs. Campbell Maintains Her Innocence to the Charges Against Her.

In short, Mrs. Campbell accepted a plea agreement through which she can maintain her innocence *and* dispute the accuracy of these facts, but also end the criminal investigation into her life and ensure that she will have no long-term criminal record from this incident.

Given the emotional and financial damages caused by the conduct of those set against her, Mrs. Campbell believed this was in her best interests at the time. However, she both can and does maintain her innocence to the charges against her.

Conclusion.

It is abundantly clear that the criminal investigation against Mrs. Campbell was launched by employees of this Board and without even speaking to Mrs. Campbell about the allegations. It is also clear that no one at the Board informed law enforcement or any other personnel that *the Board has a policy in place for relocating children* and that the most important information to determine whether or not an action is appropriate is *to talk to the educators in the arena*. Here, that was not done. Instead, law enforcement was summoned to investigate and arrest our educators.

At this time, Mrs. Campbell's recourse for this process falls upon you, the elected School Board, and her fate rests in no small part upon the ability of the Board to recognize the irregularity of the actions taken against Mrs. Campbell, the convenience of the dominoes that fell to ambush an

investigation upon Mrs. Campbell, and the unmistakable motive of the employees of this Board to have Mrs. Campbell investigated, arrested, and ultimately discharged from her employment.

On behalf of Mrs. Campbell, we ask that you take the information contained herein into consideration and to allow Mrs. Campbell the opportunity to participate in the meeting at which you will decide her fate, as she has been offered no ability to participate to date. We respectfully submit that it is within your discretion to ask for witnesses, evidence, and/or testimony at this hearing, to ensure that Mrs. Campbell is afforded due process of law.

We ask that a copy of this letter be delivered to each member of the Rutherford County Board of Education. Should you need any additional information, please do not hesitate to reach out to our office at the information provided above.

Sincerely,

/s/ W. SCOTT KIMBERLY
W. SCOTT KIMBERLY

cc: Helen Campbell