



**Bill C. Spurlock**  
Director of Schools

## **Rutherford County Board of Education**

2240 Southpark Drive, Murfreesboro, TN 37128 Phone: 615.893.5812 www.rcschools.net

May 23, 2022

VIA U.S. MAIL AND CERTIFIED MAIL

Ms. Helen Campbell  
1320 Balson Drive  
Murfreesboro, TN 37128

**RE: Notice of Charges**

Dear Ms. Campbell:

As the Director of Schools for Rutherford County Schools, and pursuant to Tennessee Code Annotated §§ 49-5-501 and 511, I will be presenting charges to the Rutherford County Board of Education to terminate you as a tenured teacher effective the date of your suspension, November 8, 2019. The grounds are (1) conduct unbecoming to a member of the teaching profession; and (2) insubordination; and (3) neglect of duty. You remain suspended without pay pending final disposition of your case/appeal, if you choose to file one.

Under State Law, the Board will review the charges to determine whether the charges, if proven true, would justify dismissal. If the Board determines the charges are of such a nature to warrant dismissal, I will give you written notice of the charges and other legal notices required under State law together with your rights to a hearing.

The charges against you are as follows:

Under Tennessee Code Annotated § 49-5-501(3), conduct unbecoming to a member of the teaching profession or unprofessional conduct may consist of but not limited to one or more of the following:

- a. Immorality;
- b. Conviction of a felony or a crime involving moral turpitude;
- c. Dishonesty, unreliability, continued willful or refusal to pay one's just and honest debts;

- d. Disregard of the teacher code of ethics in part one 10 of this chapter, in such a manner as to make one obnoxious as a member of the profession;  
or
- e. Improper use of narcotics or intoxicants.

Your conduct, arising out of the events of November 4, 2019 and thereafter, falls under sections a, b, c, and d.

Under Tennessee Code Annotated § 49-5-501(7), insubordination may consist of:

- a. Refusal or continued failure to obey the school laws of this state, to comply with the rules and regulations of the board or to carry out specific assignments made by the board, the director of schools or the principal, each acting within its own jurisdiction, when the rules, regulations and assignments are reasonable and not discriminatory;
- b. Failure to participate in an in-service training program as set up by the local board of education and approved by the state board of education;
- c. Treason, or any effort to sabotage or overthrow the government of the United States; or
- d. Refusal by the teacher to disclose to the board whether or not the teacher is, or has been, a member of the communist or other party that advocates the overthrow of the government.

Your conduct arising out of the events of November 4, 2019 and thereafter, falls under section a.

Under Tennessee Code Annotated § 49-5-501(8), neglect of duty means gross or repeated failure to perform duties and responsibilities that reasonably can be expected of one in such capacity or continued unexcused or unnecessary absence from duty.

The below factual charges are tied to the above violations:

### **Charge 1**

On November 4, 2019, after an elementary special education student allegedly failed to comply with your requests, you and a teacher dragged the student by the ankles on his back through the hallways of Walter Hill School starting at the front office to the back of the school, over 500 feet, and isolated him in a classroom. The student sustained minor injuries during this incident. Additionally, the dragging of the student was captured on school security video. This conduct was contrary to Federal and State Law, and school district policies and procedures.

**Charge 2**

You failed to report the restraint or the isolation of the student pursuant to Rutherford County Board of Education policies, procedures, and Federal and State laws.

**Charge 3**

You attempted to tamper and destroy government records by attempting and/or deleting security video footage of the incident from the school's camera system.

**Charge 4**

On January 31, 2022, you entered into a nolo contendere plea to child neglect, a class A misdemeanor stemming from your actions on November 4, 2019. You were placed on probation for a term of 11 months and 29 days.

**Charge 5**

On January 31, 2022, you entered into a nolo contendere plea to attempted destruction of government records, a class A misdemeanor stemming from your actions on November 4, 2019. You were placed on probation for a term of 11 months and 29 days, consecutive to your probation term for the child neglect.

Your actions meet the definition of unprofessional conduct/conduct unbecoming to a member of the teacher profession, insubordination, and neglect of duty as described above and found in Tennessee Code Annotated § 49-5-501. This letter constitutes written notice to you of the charges being made against you. The charges will be presented on at the board meeting Thursday, May 26, 2022 at 5:00 p.m.

Respectfully,



Bill C. Spurlock,  
Director of Schools

CC: Scott Kimberly, Esquire via email