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Sanborn Regional School District

Final Revised Investigation Report

I. INTRODUCTION

I am an attorney with Upton & Hatfield, LLP and I was hired by Attorney Jim O'Shaughnessy of Drummond Woodsum on behalf of Superintendent Thomas Ambrose to conduct an independent investigation into the conduct of a teacher at the Sanborn Regional School District (the "District"). I have experience conducting and providing legal advice regarding employment investigations in New Hampshire school districts; however, I have no prior connection or experience working with the employees of this District.

The District places younger students into one of two schools: the Kindergarten through Second Grade students attend the Bakie Elementary School (the "Bakie School"), and the Third through Fifth grade students attend the Memorial Elementary School (the "Memorial School"). This investigation involves alleged physical abuse of students by a teacher at the Bakie School. The Bakie School Principal is Dr. Elizabeth Childs and the Assistant Principal is Lorin Caffelle. The District's Director of Student Services is Dr. Troy Kennett. Director Kennett manages the District's special education program. During the 2023-2024 school year, Assistant Principal Caffelle served as the Bakie School's building-level special education coordinator and the Local Education Agency Representative ("LEA") for purposes of decision-making in special education matters. Starting in the 2024-2025 school year, this role was restructured and Meredith Davine, former Memorial School Assistant Principal, was hired as the Assistant Director of Student Services became the special education coordinator and the LEA at the Bakie School. The Human Resources director for the District is Kelli Killen, who took over this role from Diana Rooney in March of 2024. The District's Superintendent is Dr. Thomas Ambrose.

Within the Bakie School there are two classrooms designated solely for special education students. The In-step classroom is designed for students that have limited ability for verbal

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communication. The “Basics” classroom is designed for students that have some additional communication ability. According to a Board-Certified Behavioral Analyst (BCBA) in the District, the In-step classroom is for children with high cognitive needs, and the Basics classroom is for more high-functioning children that had eligibility for emotionally and behaviorally disturbed (“EBD”) supports. Ms. Ragonese is a certified BCBA and special education teacher who was hired to work as a teacher in the In-step classroom. In this role, Ms. Ragonese was tasked with implementing the Individualized Education Plans (“IEP”s) for the students in her room and the students assigned to her caseload. Ms. Ragonese also provided direct supervision and support to the Paraeducators (“Paras”) in this classroom who assisted students with their daily activities.

During the week of October 21, 2024, the District received reports that Ms. Ragonese had engaged in physical mistreatment of students in the In-step classroom. I was tasked with determining two issues: (1) whether students were harmed by Ms. Ragonese prior to the October 2024 report; and (2) whether each employee reported prior instances of alleged harm as required. In conducting this investigation, I interviewed twenty-three witnesses, including many Paras and Registered Behavior Technicians (“RBT”s) from the In-step program, BCBA’s that worked with students in the In-step program, a behavior analyst and consultant, a school counselor, and administrators at the Bakie School and at the District School Administrative Unit (“SAU”) office.

II. EVIDENCE OUTLINE

In conducting this investigation, I reviewed the following documents (listed by Exhibit number):

1. List of employees that worked in the In-step special education classroom with Ms. Ragonese and/or worked with students that were serviced by Ms. Ragonese.
2. Email communications packet including other documents relevant to the investigation submitted by Andrea Wijssen.
3. Email communications and Investigation File submitted by Diana Rooney.
4. Email Communications regarding this investigation submitted by Kelli Killen.
5. The personnel file for Ms. Ragonese
6. Correspondence with Administration, Staff, and Parents submitted by Kelli Killen.
7. Documents pertaining to information received from [REDACTED], former behavior consultant at Bakie School, submitted by Kelli Killen.
8. Timeline for Initial Investigation, submitted by Kelli Killen.
9. Notes from initial interviews completed by Kelli Killen, submitted by HR Director Killen.
10. August 2024 Staff Handbook, submitted by Superintendent Ambrose.
11. SRSD Crisis Procedures Manual, submitted by Superintendent Ambrose.
12. Text Messages submitted by Superintendent Ambrose.
13. Notice from the Department of Education to Ms. Ragonese of pending investigation.

14. Restraint and Seclusion reports from the Bakie School, submitted by Troy Kennett.
15. Documents relevant to the investigation submitted by [REDACTED]
16. Emails submitted by [REDACTED]
17. Additional Materials submitted by [REDACTED] on January 16, 2025
18. Kingston Police Report dated November 13, 2024
19. Materials submitted by [REDACTED], former Behavior Analyst
20. Additional Documents submitted by Assistant Principal Caffelle
24. Additional Documents submitted by Assistant Director Davine

In conducting this investigation, I consulted the following policies of the Sanborn Regional School District Board (listed by Exhibit number):

21. Board policy JICDA: Staff-Student Relations
22. Board policy JKA: Use of Restraints and Seclusion
23. Board policy JLF: Reporting Suspected Child Abuse or Neglect

In conducting this investigation, I completed the following interviews with employees:¹

November 21, 2024:

1. [REDACTED] Board Certified Behavior Analyst
2. [REDACTED] Registered Behavior Technician (“RBT”) Paraeducator*²
3. [REDACTED] Paraeducator*
4. [REDACTED] Registered Behavior Technician (“RBT”) Paraeducator*
5. [REDACTED] Paraeducator*

November 26, 2024:

6. [REDACTED] contracted Paraeducator
7. [REDACTED] Board Certified Behavior Analyst
8. [REDACTED] School Counselor*
9. [REDACTED] Paraeducator*
10. [REDACTED] Paraeducator*
11. [REDACTED] Paraeducator*
12. [REDACTED] Paraeducator*

December 4, 2024:

13. [REDACTED] Paraeducator**³
14. [REDACTED] Paraeducator**

¹ Ms. Ragonese resigned her employment with the Sanborn Regional School District prior to the start of this investigation; via counsel she declined to be interviewed for this report. I called an additional former Para [REDACTED] by phone and left a message, but [REDACTED] did not return my call.

² *NEA Attorneys Laura Chadwick and Callan Sullivan were present for these employee interviews.

³ **Bargaining Unit Representative was present for these interviews.

December 6, 2024

15. [REDACTED] Occupational Therapist**

December 12, 2024:

16. Lorin Caffelle, Assistant Principal***⁴
17. Dr. Elizabeth Childs, Principal***
18. Meredith Davine, Assistant Director Student Services
19. Dr. Troy Kennett, District Student Services Director
20. Kelli Killen, Human Resources Director⁵

December 17, 2024:

21. Thomas Ambrose, Superintendent of Sanborn Regional School District

January 27, 2025:

22. [REDACTED] Registered Behavior Technician and Behavior Consultant

January 28, 2025:

23. Follow Up Interview, [REDACTED]

February 5, 2025:

24. Follow Up Interview, Troy Kennett
25. Follow Up Interview, Lorin Caffelle

March 3, 2025:

26. [REDACTED] former Paraprofessional

April 11, 2025:

27. Follow Up Interview, Meredith Davine

April 24, 2025:

28. Follow Up Interview, Elizabeth Childs***
29. Follow Up Interview, Lorin Caffelle***

The evidence was reviewed, compared, and analyzed under a preponderance of the evidence standard to determine whether there were any policy violations of Board Policies JKAA: Restraint and Seclusion; JLF: Reporting Suspected Child Abuse or Neglect; and JICDA Staff-Student Relations. “Preponderance of the evidence,” for purposes of this report, means that

⁴ ***Attorney Bill Cahall, Teamsters, Present for these interviews

⁵ HR Director Killen coordinated the scheduling of all interviews; however, she was not present in the interviews and was not privy to the statements of any witnesses in this investigation prior to her own interview.

the evidence on one side outweighs, or is more than, the evidence on the other side. The conclusions in this report are drawn from the totality of the available evidence from current and former employees, and a thorough analysis of all the facts. Where necessary, credibility determinations were made.

III. WITNESS INTERVIEWS

The following information was provided by each witness listed below. Where appropriate, specific information from the attached Exhibits is referenced below.

1. [REDACTED] Board Certified Behavior Analyst

[REDACTED] stated that [REDACTED] had been working in the District for two and a half years. [REDACTED] stated Ms. Ragonese had a “very aggressive and off-putting” personality, with an abrasive tone of voice and volume of voice that was very loud, and she swore a lot in her classroom. [REDACTED] avoided Ms. Ragonese in the In-step classroom for most of the 2022-2023 school year since another BCBA was assigned to that room. During the 2023-2024 school year, a new contracted behavior consultant, [REDACTED] began supporting the In-step classroom. [REDACTED] was working towards [REDACTED] certification as a BCBA. [REDACTED] collaborated with [REDACTED] about specific students in the room and their behavior plans.⁶

[REDACTED] spoke at length about Student [REDACTED] who had challenging and unsafe behaviors in the In-step classroom at the start of the 2023-2024 school year. In October 2023, [REDACTED] told [REDACTED] that Ms. Ragonese was being “unnecessarily physical” with Student [REDACTED]; however, upon observing this Student, [REDACTED] did not see any inappropriate physical behavior from Ms. Ragonese. [REDACTED] told [REDACTED] that Ms. Ragonese acted differently when [REDACTED] was observing in the room. [REDACTED] directed [REDACTED] to start documenting [REDACTED] observations going forward. During this same time, in October 2023, Ms. Ragonese emailed several behavior support personnel, including contractors and District employees, requesting assistance with managing student behavior. See Exhibit 25 at 464-466 (emails from Ms. Ragonese).

In November 2023, [REDACTED] walked into the In-step classroom to see Student [REDACTED] having a “tantrum.” Ms. Ragonese forcefully yanked this student’s pants up very high and said “I am going to pull your pants up *real high* if you pull them down again.” [REDACTED] stated that the student was already in tears and characterized Ms. Ragonese’s actions as “giving [REDACTED] a wedgie” and stated the student continued to cry. [REDACTED] stated she spoke to Assistant Principal Caffelle and Principal Childs in early December and expressed concerns about the

⁶ In a follow-up communication on March 27, 2025, BCBA [REDACTED] clarified that [REDACTED] did not supervise [REDACTED] and that [REDACTED] “was not assigned to the In-Step Program. For clarification, I conducted three observations of a single student in the In-Step classroom between September 18, 2023 and December 1, 2023.” See Exhibit 25 at 472. [REDACTED] provided further documentation of the division of responsibilities between [REDACTED] and [REDACTED]. See Exhibit 25 at 462. [REDACTED] also provided clarification in a written statement on April 4, 2025, that BCBA [REDACTED] was not [REDACTED] supervisor. See Exhibit 30 at 553 (stating [REDACTED] was [REDACTED] “superior and my first point of contact at Sanborn, and a colleague that I was told to take directives from”).

relationship between Ms. Ragonese and Student [REDACTED] See Exhibit 25 at 476 (confirming conversation between [REDACTED] and Assistant Principal Caffelle in early December 2023); see also Exhibit 25 at 478 (confirming student transfer). According to [REDACTED], [REDACTED] told the two administrators that Ms. Ragonese was “presenting unclear demands, setting unreasonable expectations, failing to deliver promised rewards to [REDACTED], [engaging in] excessive hands on and intentional physical contact.” [REDACTED] states [REDACTED] categorized Ms. Ragonese’s behavior as someone “losing patience with someone with challenging behavior” and told the administrators that the student should be moved because it was “not safe for [REDACTED]” [REDACTED]

The school administrators moved Student [REDACTED] [REDACTED] [REDACTED].⁶ After Student [REDACTED] [REDACTED], Ms. Ragonese was still assigned as the student’s case manager, which meant that Ms. Ragonese continued to provide special education instruction and services to this student.

[REDACTED] continued to receive reports from [REDACTED] regarding negative interactions between Ms. Ragonese and Student [REDACTED].⁷ [REDACTED] said [REDACTED] felt “uncomfortable” working with Ms. Ragonese. [REDACTED] also received the following notation from [REDACTED] regarding an incident on February 20, 2024 in a shared document:

Concerns-Crisis plan needs to be revisited [REDACTED] entered Basics room and student was in crisis, Crisis team [REDACTED] A Ragonese, [REDACTED] SRO present. [REDACTED] observed AR standing behind students chair at the table and pushing the chair into the table while the student yelled “My belly hurts” and crying. AR told student if [REDACTED] belly hurts [REDACTED] needed the bathroom and escorted [REDACTED] to the toilet in Basics pushing [REDACTED] shoulders to face the toilet a the student cried and told her that [REDACTED] would pee on her. When the student said that [REDACTED] would pee on her she would physically move [REDACTED] body to face the toilet and push [REDACTED] forward toward the toilet bowl. The student did not void and continued to cry, spit at AR, yelled “don’t hurt me”, “I want to go home, “I’m sick”, engage in property destruction, sat on top of the door as student grabbed her arm from inside door, spit, hit, disrobe, scream, cry, void on floor. AR Physically guided student away from door multiple times. Excessive use of hands on. See Exhibit 7 at 185.

[REDACTED] had a “casual conversation” with Director Kennett at the SAU office in February, in which [REDACTED] shared that [REDACTED] “felt uncomfortable and scared of [Ms. Ragonese].” See Exhibit 2 at 8. When [REDACTED] shared these feelings of discomfort with Director Kennett in February 2024, Director Kennett’s response was that [REDACTED] would “just have to deal with it.” See Exhibit 7 at 185.⁸

⁷ [REDACTED] provided clarification on March 27, 2025 that “I was under no obligation to review [REDACTED] documents or files nor did I review [REDACTED] documents or files while [REDACTED] was contracted with Sanborn Regional District (“District”) during the 2023-2024 school year.” See Exhibit 25 at 473.

⁸ [REDACTED] notes include a detailed statement of an incident on February 20, 2024 that [REDACTED] discussed with [REDACTED]

In March of 2024, ██████ spoke to school counselor ██████ about an incident involving Ms. Ragonese with a student in the hallway.⁹ ██████ stated that ██████ became a target for Ms. Ragonese, who began spreading rumors and “making nasty comments” about ██████. ██████ stated that last year Ms. Ragonese also “ridiculed” ██████ an Occupational Therapist (“OT”) at the Bakie School, and that Ms. Ragonese was “hostile” towards anyone she didn’t like.

██████ provided documentation from ██████ a psychologist from a contracting agency called “██████”. ██████ was hired to conduct an independent evaluation of Student ██████. In this documentation, ██████ reported an observation of inappropriate physical behavior between a teacher and an apparently disabled student in the hallway. In the emails, Director Kennett acknowledges the concerns and assigned Assistant Principal Caffelle to respond.¹⁰

On May 17, 2024, ██████ sent an email to Assistant Principal Caffelle and Principal Childs, requesting to meet about concerns regarding Ms. Ragonese. According to emails in Exhibit 2 and Exhibit 4, Principal Childs was not available at the requested time but offered to meet earlier that day or on Monday. See Exhibit 2 at 9. On Monday May 20, 2024, ██████ met with both Assistant Principal Caffelle and Principal Childs. ██████ states ██████ told the administrators that Ms. Ragonese was trying to sabotage the program and to review inappropriate interactions between Ms. Ragonese and a student. See Exhibit 2, page 9.¹¹ ██████ email to Principal Childs and Assistant Principal Caffelle highlighted that the request was about a “personnel concern” that ██████ “would like to be able to handle on [██████] own” but decided to include the administration because “it relates to the interactions between a staff member and her students.” See Exhibit 2 at 9.

In May of 2024, ██████ worked with two Paras, ██████ and ██████ to teach them the new protocol for Student ██████ after completing a ██████ with BCBA ██████ to assist staff with ██████ behaviors. ██████ stated that both Paras began to cry “profusely” during a debriefing session for the new protocol. ██████ stated they expressed that they “felt so bad about how [this student] had been treated.” ██████ stated they did not elaborate, and ██████ did not ask questions because ██████ didn’t want them to feel judged.

In June 2024, ██████ spoke to ██████ about a reported incident of abuse and instructed ██████ to report the incident.¹² Specifically, according to ██████ in ██████

⁹ ██████ provided clarification on March 27, 2025 that District staff did not “consult” with ██████ regarding concerns related to Ms. Ragonese. See Exhibit 25 at 473.

¹⁰ BCBA ██████ was copied on the emails and referenced by ██████ as present, but was not given a role in responding to, this complaint.

¹¹ This meeting was approximately two weeks after ██████ a contracted BCBA from ██████ provided an email to Director Kennett and Assistant Principal Caffelle, on which ██████ was copied.

¹² See Exhibit 30 at 553-557 (clarification from ██████ regarding ██████ providing ██████ guidance in making this report).

interview on November 21, 2024, ██████ had received a report from Para ██████ about witnessing physical abuse of a student. Based on this conversation, ██████ believed ██████ met with Assistant Principal Caffelle at the beginning of June 2024 to discuss what ██████ referred to as the “June 5 incident” and to share other concerns from the 2023-2024 school year. According to the notes from ██████ (supplied by HR Director Killen), ██████ met with Assistant Principal Caffelle on June 6 to discuss concerns about an incident on June 5. See Exhibit 7. ██████ followed up after a meeting with Assistant Principal Caffelle on June 6, 2024, and copied Director Kennett, Principal Childs, and Assistant Principal Caffelle. See Exhibit 2 at 11; see Exhibit 2 at 12 (email referring to Ms. Ragonese as “an antecedent for challenging behavior”). ██████ documented this report from ██████ as follows:

6/6/24: Behavior Specialist met with Assistant Principal and shared information regarding above instances across the year and concerns about AR putting hands on students, students fear of AR, and the unnecessary use of force on Students to manage their behaviors. Behavior Specialist sent written confirmation of discussion to Assistant Principal, Principal, and Director of Student Services. Exhibit 2 at 6.

██████ also reported that during a training session at the end of the 2023-2024 school year, Para ██████ became emotional and stated “I witnessed something and I wish I had reported it, but will say right now in front of everyone, if I ever see something again, first thing I will do is report.” ██████ stated that ██████ did not pressure ██████ any further. ██████ documented this meeting, writing:

June 2024: Paras met with District BCBA and shared how badly they felt about the harsh treatment of students in the In-Step Classroom. Paras did not share details [and reported they were scared to share information]. I encouraged them to never use punitive strategies/ threats of harm. Encouraged them to also report any instances of harm to children.” Exhibit 2 at 6.

██████ stated that on September 9, 2024, Ms. Ragonese made an “unprofessional comment” in the hallway by stating that Student ██████ was ██████ “██████”. See Exhibit 2 at 20. ██████ emailed Director Kennett that same day to report ██████ concerns about Ms. Ragonese. See Exhibit 27 at 517. According to ██████ after ██████ followed up with Director Kennett about the incident, his response was to let Assistant Director Davine handle the concerns. See Exhibit 27 at 518-519 (showing Assistant Director Davine scheduling, and following up after, a meeting with Ms. Ragonese and her union rep on September 10-11, 2024).

On Monday, October 21, 2024, Para ██████ came to ██████ and reported an incident between Ms. Ragonese and a student on the previous Friday, October 18, 2024. See Exhibit 2 at 7 (timeline for reports in October 2024). ██████ was crying and told ██████ ██████ was concerned about a “physical incident” and was “scared” of retaliation. On October 21, ██████ emailed Assistant Director Davine, Assistant Principal Caffelle, Principal Childs, and copied School Counselor ██████ and informed this group that a Para had “concerns ... about

how an In-Step student was recently treated by Aimee.” See Exhibit 27 at 521. [REDACTED] forwarded this email to HR Director Killen on October 23.

On October 23, 2024, [REDACTED] met with Paras [REDACTED] and [REDACTED] as part of a previously scheduled monthly meeting. During the meeting, the Paras began crying and shared further concerns about the safety of the students in the In-step classroom working with Ms. Ragonese. They reported that “[Ms. Ragonese] told them to dig fingers into [the student’s] armpits to get a student to move.” See Exhibit 2 at 7. They reported kids were in the classroom with their hands under their armpits, covering their armpits whenever Ms. Ragonese was nearby. [REDACTED] responded that they must report the abuse that they observed. Id. [REDACTED] then took several steps to report this information, by: emailing Principal Childs, Assistant Principal Caffelle, and HR Director Killen on October 24, 2024¹³; meeting with HR Director Killen on October 25, 2024; reporting the allegations of abuse to the Department of Children, Youth, and Families (“DCYF”) on October 26, 2024; sending a courtesy email to HR Director Killen and Principal Childs on October 26 to notify them of the DCYF report, and provided follow-up documentation to DCYF on October 28, 2024. See Exhibit 25 at 466.

[REDACTED] stated that [REDACTED] had a conversation with Director Kennett after the reports were made to DCYF, in which [REDACTED] was crying and said “this wouldn’t be an issue if it was dealt with appropriately last year.” According to [REDACTED] Director Kennett’s response was to hold out his hand and say, “what are you talking about?” to which [REDACTED] replied, “this has been brought to your attention over and over again.” Director Kennett then stated, “well, I was under the impression that people had dealt with it.” When [REDACTED] apologized for raising [REDACTED] voice during the conversation, Director Kennett’s response was to minimize [REDACTED] concerns and say “No, No It’s OK, I can tell you’re very passionate about this.” [REDACTED] conveyed feeling like [REDACTED] concerns, and those of the staff, had always been minimized and not appropriately received by administrators, and that this follow-up conversation with Director Kennett was exemplary of his typical response to reports of abuse.

[REDACTED] concluded [REDACTED] interview by expressing concerns of retaliation by the administration. [REDACTED] stated that Assistant Director Davine had instructed the Paras not to speak to [REDACTED] after the October complaints were brought forward. [REDACTED] further said that the Paras were fearful of coming forward and were experiencing ongoing concerns of retaliation if they made reports against Ms. Ragonese.

[REDACTED] statements in this interview were consistent with, and expanded on, the statement [REDACTED] made to HR Director Killen on October 25, 2024. See Exhibit 9, page 210-11; see Exhibit 2 at 31. On January 16, 2025, [REDACTED] sent an email to this investigator, including additional documentation related to the investigation. See Exhibit 17 at 315. [REDACTED] submitted additional email communications with Principal Childs and Assistant Principal Caffelle. A review of these reports shows discussion about concerns in the In-step classroom, a

¹³ See Exhibit 2 at 28.

first-grade field trip, and Ms. Ragonese “triggering” Student [REDACTED]. See Exhibit 17 at 317-322.

2. [REDACTED] Registered Behavior Technician (“RBT”) Paraeducator*⁹

[REDACTED] has been employed at the Bakie School for nineteen years. During this time, [REDACTED] was assigned to the In-step classroom, the Basics classroom, and rotations in general education classrooms. Regarding Ms. Ragonese, [REDACTED] gave general observations that she was not available for supervision on a regular basis, that she rarely worked with the kids, and that she was loud in a way that was scary for the students. Ms. Ragonese used foul language, would slam the door open, knock kids down, and tell them it was their fault. When asked to provide a specific example, [REDACTED] did not have a specific student in mind but stated that Ms. Ragonese was “verbally caustic,” and that she “promoted fear” in her classroom.

[REDACTED] observed that Ms. Ragonese was initially easier to work with. [REDACTED] [REDACTED] some of Ms. Ragonese’s statements each day. Ms. Ragonese started with another teacher in the classroom and initially directed her difficult behavior towards staff, not students. [REDACTED] observed Ms. Ragonese’s behaviors escalate. [REDACTED] saw Ms. Ragonese take students by the arm and pick them up to use the toilet. [REDACTED] stated that when concerns were raised to Ms. Ragonese about her demeanor or treatment of students, that Ms. Ragonese would laugh in response. [REDACTED] observed Ms. Ragonese return from meetings with administrators after getting a “slap on the wrist” and saw Ms. Ragonese laugh and put on a show for the other employees in the room.

During the 2023-2024 school year, [REDACTED] observed physically abusive behavior. Student [REDACTED] eloped to the room next door (the OT room). Ms. Ragonese picked [REDACTED] up and carried [REDACTED] back to the classroom by [REDACTED] armpits then dropped [REDACTED] on the floor. Ms. Ragonese said, “you can go work now” and picked [REDACTED] up again by the armpits and put [REDACTED] in a chair. Although the student did not show any visible reaction to being picked up, Ms. Ragonese asked [REDACTED] to check his armpits, and [REDACTED] found bloody scratch marks. [REDACTED] asked if [REDACTED] should take the student to the nurse because of the bloody marks, and Ms. Ragonese said “no.” [REDACTED] then asked if [REDACTED] should take pictures or email the student’s [REDACTED] and Ms. Ragonese said “no” to each, stating the student’s [REDACTED] “won’t even notice.” [REDACTED] described this student as having low verbal skills but [REDACTED] and could not easily communicate full sentences or relate a sequence of events.

[REDACTED] also observed an incident with Student [REDACTED] Generally, Ms. Ragonese used a “mean tone” of voice with this student, who would try to spit, throw up, or pee on Ms. Ragonese. To de-escalate, Ms. Ragonese would use a yelling voice to say, “you can’t do that” or “you sit down” or “don’t you dare” or “you’ll do as I say.” [REDACTED] saw Ms. Ragonese “manhandle” this student into the movable wall, which she used a lot with this student. [REDACTED] also observed Ms. Ragonese escort this student to “Room 8” (which she identified as a place for this student to calm down) by grabbing [REDACTED] under the armpits to keep

him walking. [REDACTED] did not report these observations. [REDACTED] stated that Ms. Ragonese was “very careful” not to “manhandle” Student [REDACTED] and that [REDACTED] never saw physical behavior with Student [REDACTED]

This school year (2024-2025), [REDACTED] stated that [REDACTED] saw Ms. Ragonese be “pretty rough” with a new student, [REDACTED]. In one specific instance, the student was being volatile ([REDACTED] was “smashing” [REDACTED] head against the window), and Ms. Ragonese grabbed the student’s arm and yanked it with force. [REDACTED] described it as a “hard yank” on [REDACTED] upper arm, and the student was yelling and screaming, and continued to do so. [REDACTED] stated that since Ms. Ragonese left the In-step classroom, this student is a “different kid” and does not have the same severe meltdowns that [REDACTED] did with Ms. Ragonese. In general, [REDACTED] described all the students as being “more relaxed” since Ms. Ragonese left the room.

[REDACTED] stated [REDACTED] did see administrators occasionally come to the room, including Assistant Principal Caffelle, typically prior to student arrival. [REDACTED] did not hear the specific conversations between Assistant Principal Caffelle and Ms. Ragonese but saw they had a friendly relationship. Regarding [REDACTED] failure to report the observed abuse, [REDACTED] stated that [REDACTED] had just seen [REDACTED] ridiculed by Ms. Ragonese for reporting a concerning behavior. [REDACTED] was supposed to report directly to Ms. Ragonese and believed that if [REDACTED] went above Ms. Ragonese’s head to make a report of suspected abuse, or of her restraint and seclusion practices, that [REDACTED] would be fired or removed from the In-step classroom.

[REDACTED] statement was consistent with [REDACTED] statement to HR Director Killen on October 25, 2024, during which [REDACTED] also reported seeing “marks and blood” on a student. See Exhibit 9, page 222-223.

3. [REDACTED] Paraeducator*

[REDACTED] has been employed at the Bakie School for two (2) years, and spent [REDACTED] time mostly assigned to the In-step classroom. As a general observation, [REDACTED] said that Ms. Ragonese did not “work with kids” except for Student [REDACTED]. Ms. Ragonese had told [REDACTED] not to trust other people in the school, including [REDACTED]. [REDACTED] stated that Ms. Ragonese initially treated [REDACTED] very well, which “put a damper on seeing things in the proper light.”

[REDACTED] further observed that Ms. Ragonese treated Student [REDACTED] terribly, placing [REDACTED] behind the movable wall for long periods of time, stating sometimes [REDACTED] was released but that with any new behaviors, Ms. Ragonese would send [REDACTED] right back behind the wall. During the 2023-2024 school year, [REDACTED] saw Ms. Ragonese be physical with this Student and drag [REDACTED] across the floor with her hands under [REDACTED] armpits while [REDACTED] resisted. [REDACTED] also observed Ms. Ragonese say “you’re gross” to this student. [REDACTED] observed Ms. Ragonese corral Student [REDACTED] into a corner, but [REDACTED] did not see Ms. Ragonese touch him.

Starting in the 2024-2025 school year, ██████ stated that it “started off really rough.” Ms. Ragonese’s physical behavior with students and verbal demeanor was worse than the prior year. In one incident, ██████ observed Student ██████ flop on the floor. Ms. Ragonese picked the student off the floor with “her manner” which ██████ identified as under the armpits, then brought ██████ to ██████ workspace. The student rubbed ██████ armpits upon sitting down.

Also during the 2024-2025 school year, Ms. Ragonese was with Student ██████ when she grabbed the student’s upper arm and twisted the student behind ██████ body. The student’s body flung behind ██████ and the student became angry. ██████ observed Ms. Ragonese do the same thing twice within ten seconds. After putting the student behind the wall, Ms. Ragonese put her hand on the wall “knowing ██████ doesn’t like it” according to ██████. When the student attempted to hit Ms. Ragonese, she responded by pushing the wall backwards, causing the student to fall on the floor. ██████ could not see fully what happened but saw a “bad look” on ██████ face in response, and believed the other Para may have seen what happened.¹⁴

████████ stated ██████ then reported everything that happened with this student to ██████ including that the student was dragged by the armpits and pushed behind the wall. ██████ believed that ██████ requested a meeting with HR Director Killen a few days later. ██████ stated that ██████ told ██████ about concerns regarding Student ██████ last year, but that nothing came of it.¹⁵ ██████ identified that ██████ would now report any concerns directly to ██████. ██████ stated that ██████ would not report to Assistant Principal Caffelle because things reported to her last year “didn’t go anywhere.”

████████ expressed a significant concern about the reporting process. According to ██████ when other employees reported Ms. Ragonese’s behavior last year, Ms. Ragonese immediately found out (within a week or two) who made the complaint. ██████ noted that ██████ faced retaliation from Ms. Ragonese for reporting. ██████ shared that after seeing how ██████ was treated for making a report, the idea of making any report ██████ was scary. ██████ stated that if Ms. Ragonese “didn’t like you, [you] wouldn’t work in [the] In-step [classroom].” According to ██████, Ms. Ragonese hated ██████ after ██████ made a report, and Ms. Ragonese came back “laughing” from a meeting with administration regarding ██████ report, treating any conversation like “it was a joke.” ██████ stated that Ms. Ragonese returned from meeting with Assistant Director Davine and Assistant Principal Caffelle regarding comments to ██████ in the hallway with “direct knowledge” of what was said and expressed annoyance that she kept getting reported.

¹⁴ For reference, ██████ states in ██████ interview, outlined below, that ██████ also did not observe the direct physical interaction between Ms. Ragonese and this student.

¹⁵ See Exhibit 30 at 554 (clarification from ██████ that ██████ did provide this report to Assistant Principal Caffelle in June 2024).

█████ statements in this interview regarding Ms. Ragonese were consistent with █████ interview with Assistant Director Davine on October 24, 2024. See Exhibit 4 at 60. █████ was also consistent in █████ report to HR Director Killen. See Exhibit 9 at 218-219.

4. █████ Registered Behavior Technician (“RBT”) Paraeducator*

█████ is an RBT and Para at the Bakie School and █████ works in the In-step classroom. The 2024-2025 school year is █████ fourth year working at the Bakie School. █████ stated Ms. Ragonese was “loud” and “unprofessional.” █████ stated that Ms. Ragonese told █████ that if █████ was unable to get a kid to stand, █████ should drive her thumbs into the student’s armpit, and they won’t like it, and they will get up. █████ observed Ms. Ragonese yank students by the arms, grab them, and pull them by the hand to get them off the ground. █████ did not have a specific student to identify for these behaviors, but indicated they were general observations in the classroom. Generally, █████ also observed Ms. Ragonese “swoop in” and grab students, put them in chairs, and block the back of the chair so that the student could not get out of the chair. █████ indicated it was a “restraint in a chair” but did not believe it was reported.¹⁶

Specifically, in the 2023-2024 school year, █████ observed Student █████ under a table and saw Ms. Ragonese grab this student by the ankle and swiftly pull the student out from under the table in one motion. █████ stated that Ms. Ragonese used so much force that she pulled the student’s whole body off the floor and the student was “stunned” but not crying. With Student █████ Ms. Ragonese was aggressive, often wrangling and getting the student into the bathroom or to the chair. Ms. Ragonese also pulled and grabbed the student off the floor. █████ observed Ms. Ragonese come up, grab the student around the middle, push the student, place her thumbs in the student’s armpit, and force █████ to move.

█████ did recall an incident with Student █████ that was reported to the administration last year and stated that Ms. Ragonese “laughed it off.” █████ recalled that Ms. Ragonese entered the classroom and told the Paras in the room that she knew which employee made the report. █████ stated that Ms. Ragonese “brushed” it off, and █████ observed Ms. Ragonese say “who are they to challenge me?” █████ also heard Ms. Ragonese say that parents would not complain if the students didn’t have any marks on them. █████ stated █████ “would not want to be on [the] bad side of treatment from [Ms. Ragonese].”

At the start of the 2024-2025 school year, █████ observed an incident with a new student in the program. Student █████ was hitting █████ head and was brought to the OT room. Ms. Ragonese went to the OT room and tried to coax the student into the swing, with █████ present. The student went to hit Ms. Ragonese, but instead of blocking the student, Ms. Ragonese took both hands, put them on both of the student’s upper arms, and “swooped █████ down to the

¹⁶ A review of available restraint reports from the 2023-2024 school year does not include any reported incidences of Ms. Ragonese using a chair and table to restrain a student.

mat.” Ms. Ragonese did this motion three times with this student. [REDACTED] later overheard Ms. Ragonese tell another OT that she (Ms. Ragonese) kept “redirecting” the student, but [REDACTED] believes that categorization is not accurate.

[REDACTED] stated that after this incident, the reports to administration started, but that Ms. Ragonese would behave better towards students with administrators present. [REDACTED] stated that Ms. Ragonese always knew who reported her. [REDACTED] stated nobody asked [REDACTED] about what happened in room 8. [REDACTED] stated that this year, nothing changed: even after two known reports, Ms. Ragonese was “not concerned, phased, [or] affected” by the reports or conversations with the administration, nor did she change her behavior. [REDACTED] stated [REDACTED] did not want to report anything against Ms. Ragonese, but acknowledged [REDACTED] should have reported the incident with the student in the OT room and now would report such behavior going forward.

[REDACTED] statements were consistent with [REDACTED] interview with HR Director Killen on October 25, 2024. See Exhibit 9 at 224-225.

5. [REDACTED] Paraeducator*

Para [REDACTED] described Ms. Ragonese as having a mean and overbearing demeanor. [REDACTED] stated that [REDACTED] observed that students sitting on the floor would “jump” in fear when Ms. Ragonese approached. Ms. Ragonese would forcefully move kids where she wanted them to be, and “plop” them in the seats. Ms. Ragonese would also put her own chair behind the student’s chair at a table, so the student could not move. Ms. Ragonese advised [REDACTED] that to move a kid, [REDACTED] should put her thumb into their armpit to move them. [REDACTED] observed Ms. Ragonese “pick up and plop down” students but could not always see or tell if her fingers were in the students’ armpits. At one point, Ms. Ragonese asked [REDACTED] to “just check [Student] [REDACTED]” for scratch marks, but [REDACTED] did not find scratching on this student. [REDACTED] explained that Ms. Ragonese was concerned that she may have scratched the student while using the armpit technique to move this student.

During the 2023-2024 school year, [REDACTED] observed Student [REDACTED] refuse to come out from under a desk. [REDACTED] saw Ms. Ragonese reach under the desk, grab the student and pull [REDACTED] out. [REDACTED] described the student as surprised, and stated it was an isolated incident. [REDACTED] did not report this observation.

During the 2024-2025 school year, [REDACTED] stated that Student [REDACTED] was placed behind a movable wall in [REDACTED] own corner. [REDACTED] observed the student put [REDACTED] hands towards the wall, and saw Ms. Ragonese respond by pushing back on the wall towards the student. The momentum from Ms. Ragonese pushing the wall forced the student to be pushed backwards. The week before the behaviors were reported, [REDACTED] saw Ms. Ragonese take this same student from the room, quickly and forcefully, but didn’t see where her hands were on the student’s body. [REDACTED] explained another incident when [REDACTED] saw Student [REDACTED] with Ms. Ragonese and [REDACTED] in the hallway. [REDACTED] observed Ms. Ragonese pin the student against the wall

while ██████ regulated the student.¹⁷ ██████ felt that they did not receive any support from the administration even after these allegations were reported and known.

██████ stated ██████ tried to report these behaviors anonymously to Principal Childs and that ██████ discussed general concerns with ██████ ██████ was worried about how Ms. Ragonese would respond if a report was made. ██████ stated ██████ previously observed Ms. Ragonese shrug and say “I did nothing wrong” in response to reports made against her.

██████ statements regarding Ms. Ragonese were consistent with ██████ interview with Assistant Director Davine on October 24, 2024, except that ██████ told Assistant Director Davine that in the October 2024 incident, Student ██████ did not fall when pushed back from the movable wall. See Exhibit 4 at 60-61. ██████ was also consistent in ██████ statements to HR Director Killen. See Exhibit 9 at 216-17.

6. ██████ contracted Paraeducator

██████ was contracted to be in the In-step classroom during the 2023-2024 school year. ██████ was reassigned for the 2024-2025 school year after telling Principal Childs and Assistant Principal Caffelle that ██████ refused to return to the In-step classroom.

Generally, ██████ found Ms. Ragonese to be very difficult to work with, saying that she swore a lot around students, staff, and really anyone in the room. ██████ stated that Ms. Ragonese was not very professional with language or behavior.

██████ observed an incident with Student ██████ in which the student was at the window, near Ms. Ragonese’s desk. Ms. Ragonese grabbed the student’s neck and dug her fingernails into the student’s back. The student started crying and had blood and fingernail marks on ██████ back. Ms. Ragonese told ██████ “I’ve got this covered” but ██████ doesn’t know if it was documented anywhere or if the nurse saw the student. ██████ stated that ██████ informed Principal Childs and Assistant Principal Caffelle about Ms. Ragonese’s unprofessional demeanor, but ██████ did not report the injury observed on this student.

Regarding Student ██████, ██████ recalled that any time Ms. Ragonese walked into the room, this student would say “don’t hurt me don’t hurt me” and that Ms. Ragonese would put her thumb under ██████ armpit and hurt ██████ with a pushing-up motion. When Ms. Ragonese did this maneuver with her thumb under this student’s armpit, the student would get up off the floor. ██████ viewed this behavior more than five but fewer than ten times during the 2023-2024 school year. ██████ did not report these observations.

██████ also recalled that Ms. Ragonese would place Student ██████ into a movable wall divider, and that the student would sit alone in the little circle, sometimes alone and sometimes with ██████. Ms. Ragonese would visit this student in the Basics classroom, would say the student’s behavior was “unacceptable” then say, “nobody wants my f’ing job”.

¹⁷ See ██████ interview, below, in which this incident is explained, and a restraint report was made.

This employee, unlike others, observed that Ms. Ragonese was “short” with Student [REDACTED] and used inappropriate language with [REDACTED] as well.

[REDACTED] acknowledged that [REDACTED] did not report [REDACTED] concerns and cited that [REDACTED] does not like confrontation in the workplace. [REDACTED] expressed remorse that [REDACTED] did not say anything sooner.

7. [REDACTED] Board Certified Behavior Analyst

BCBA [REDACTED] began working at the Bakie School, in the In-step classroom, during the 2024-2025 school year. Ms. Ragonese was initially loud in [REDACTED] presence, and [REDACTED] noticed her inappropriate volume and tone of voice, but then Ms. Ragonese became “overly nice” with [REDACTED] present. Three Paras told [REDACTED] that they wished [REDACTED] was present in the In-step classroom more often.

[REDACTED] stated that [REDACTED] engaged in a restraint and seclusion with Ms. Ragonese for a student that displayed aggressive behavior and frequently hit [REDACTED] head on anything nearby. A seclusion was used to address “self-injurious behaviors” by placing the student alone into a movable wall. [REDACTED] agreed it was the best way to handle the matter but stated that [REDACTED] concern was that as they completed the incident, [REDACTED] stated it had to be written up as a seclusion. [REDACTED] felt [REDACTED] had to “convince” Ms. Ragonese to complete the required state of New Hampshire reporting form, which Ms. Ragonese completed with Assistant Director Davine. [REDACTED] did not otherwise observe any inappropriate physical behavior from Ms. Ragonese with students.¹⁸

[REDACTED] observed Ms. Ragonese’s voice to be loud when she sat behind her desk, citing that Ms. Ragonese would yell at students instead of getting up to walk over and talk to them. Once Ms. Ragonese yelled so loud at a student who tried to cross the “blue line” that is used to mark where students are not permitted, that [REDACTED] jumped.

Regarding reporting, [REDACTED] stated that in October 2024 one of the Paras, [REDACTED] was worried about leaving a student alone with Ms. Ragonese. [REDACTED] relayed this concern to [REDACTED] who informed [REDACTED] she would be making a report.

8. [REDACTED] School Counselor*

[REDACTED] has been with the District since 2017 and is employed as a school counselor. [REDACTED] stated [REDACTED] does not regularly work in the In-step classroom; however, [REDACTED] does assist with regulating students who are in crisis. During the 2023-2024 school year, [REDACTED] noticed an increase in student [REDACTED] behavior, noting that the school’s crisis team supported [REDACTED] frequently. [REDACTED] observed Ms. Ragonese to be antagonistic towards this student, as if she was “out to get [REDACTED] and stated she would “rile [REDACTED] up.”

¹⁸ The seclusion report was not provided during this investigation.

Specifically on March 5, 2024, [REDACTED] was in the Kindergarten hallway at dismissal time. [REDACTED] stated student [REDACTED] refused to keep moving. [REDACTED] used verbal and visual prompts, but [REDACTED] wouldn't move. [REDACTED] stated [REDACTED] heard Ms. Ragonese coming down the hall and that Ms. Ragonese forcefully took the student by the armpits and pushed the student down the hallway. At the time, the student was wearing a coat and backpack, and Ms. Ragonese pushed [REDACTED] down the hallway with [REDACTED] feet on the floor while the student resisted her movement. [REDACTED] said she was in shock and went to find an administrator. [REDACTED] told Assistant Principal Caffelle everything [REDACTED] saw in the hallway. [REDACTED] stated Ms. Rooney, the District's then-Human Resources Director, helped guide the investigation process. See Exhibit 15 at 292-294. [REDACTED] met with Ms. Rooney to express concerns about Ms. Ragonese's lack of professionalism and her improper use of appropriate CPI techniques.

[REDACTED] stated that after [REDACTED] reported her observations of Ms. Ragonese in the hallway, [REDACTED] felt the administration "didn't take it seriously." [REDACTED] explained that when Director Kennett became aware of the allegations, he "brushed it off" by making a quick stop at [REDACTED] office to acknowledge [REDACTED] report. Director Kennett did not provide a formal response to [REDACTED] report and [REDACTED] did not receive any information regarding the outcome of the investigation. [REDACTED] noted that with Principal Childs out a lot, the building was "functionally without a leader" and that there was no trust in administration for making reports. Overall, [REDACTED] felt they all got the "run around" and nothing was taken seriously. See Exhibit 3 at 38 (including [REDACTED] statement to HR Director Rooney that "people have come to [REDACTED] about things they see. Know this is not the only incident" and that [REDACTED] does "not think [Assistant Principal Caffelle] is going to do anything to change this").

During the 2024-2025 school year, [REDACTED] stated [REDACTED] was aware of two incidents on the day of a fire drill. First, [REDACTED] saw Ms. Ragonese grab Student [REDACTED] during a fire drill. [REDACTED] observed that although this student was not running away, Ms. Ragonese grabbed the student's arm and moved the student along with the other kids. [REDACTED] noted [REDACTED] concern that Ms. Ragonese is "just a bigger person with a lot of force". [REDACTED] was worried about that amount of force with the smaller child but acknowledged that Ms. Ragonese completed a restraint form for this incident.¹⁹

Also on this same day, Para [REDACTED] approached [REDACTED] and stated [REDACTED] observed that Ms. Ragonese grabbed a student by the shoulders. Para [REDACTED] expressed concern that Ms. Ragonese may have hurt the student's arms. [REDACTED] directed the Para to make a report to the administration.

[REDACTED] stated that [REDACTED] was scheduled to meet with Assistant Director Davine regarding [REDACTED] observations during the fire drill. A review of emails submitted by [REDACTED] shows that [REDACTED] did email Assistant Director Davine about scheduling a meeting, but the

¹⁹ This restraint report was not provided for review during this investigation.

emails do not provide information as to whether the meeting took place. See Exhibit 15 at 296-297.

9. [REDACTED] Paraeducator*

[REDACTED] has been an employee of the District for seventeen years. During the 2023-2024 school year, [REDACTED] was typically assisting a Kindergarten student who sometimes went to the In-step program.

[REDACTED] stated [REDACTED] did observe Ms. Ragonese being physical with students during the 2023-2024 school year. Specifically, with Student [REDACTED], [REDACTED] went into the In-step classroom and heard Ms. Ragonese and the student enter the room. [REDACTED] heard a bumping noise and a slam, and turned quickly to see [REDACTED] saying, “you hurt me, you hurt me, you hurt me.” [REDACTED] states [REDACTED] locked eyes with Ms. Ragonese and then left the room. [REDACTED] felt bad about leaving the room, stating that the student was on the floor, trying to get away from Ms. Ragonese ([REDACTED] described it as the student just sliding across the floor). [REDACTED] states [REDACTED] made a verbal report of this observation to Assistant Principal Caffelle two days later.

[REDACTED] states that around this same time, Ms. Ragonese became aggressive towards [REDACTED] saying “Oh my, are you in for a rude awakening next year.” [REDACTED] states that Ms. Ragonese also threatened to change [REDACTED] work schedule. When [REDACTED] pushed back, Ms. Ragonese said “I have [Assistant Principal Caffelle] wrapped around my baby finger, she's afraid of me, she will do anything I will say. [Director Kennet], he's not over here, he can F himself, I have your schedule.” [REDACTED] expressed additional concerns about Ms. Ragonese not sending students to the nurse when they were harmed, not reporting instances of restraint or seclusion, and that other Paras had left due to Ms. Ragonese's behavior. [REDACTED] did not have specific examples for these additional concerns.

[REDACTED] stated that other employees were worried that reporting fell “on deaf ears,” echoing the belief that Assistant Principal Caffelle was never willing to have confrontation. [REDACTED] states that [REDACTED] reported [REDACTED] concern that Ms. Ragonese was bullying employees to Assistant Principal Caffelle and Principal Childs and subsequently informed these building administrators that [REDACTED] refused to work in the In-step program the following year.

[REDACTED] reported Ms. Ragonese's physical abuse of students to Director Kennett. [REDACTED] states [REDACTED] s [REDACTED] During this time, [REDACTED] with Director Kennett and explained that Ms. Ragonese hurts the kids, explaining how Ms. Ragonese takes her thumbs and pushes them under the student's armpits while the kids yell “you're hurting me.” [REDACTED] told Director Kennett that Ms. Ragonese lifts the students up to the point of being on “tippy-toe” when she used this move. [REDACTED] states [REDACTED] informed Director Kennett [REDACTED] observed this specific behavior three times. [REDACTED] did not provide information regarding any follow-up from Director Kennett to this conversation. [REDACTED] expressed remorse that [REDACTED] did not immediately report [REDACTED] observations.

10. [REDACTED], Paraeducator*

[REDACTED] started at the Bakie School in March 2024, and described the In-step classroom as “institutionalized” meaning that it had bare walls while Ms. Ragonese was in the room. Ms. Ragonese was “very loud” and “very brash” overall but was polite to [REDACTED] when [REDACTED] started. Ms. Ragonese would tell Student [REDACTED] “you’re disgusting” because [REDACTED] would tend to have a runny nose, and [REDACTED] heard Ms. Ragonese tell Student [REDACTED] to “shut up.” [REDACTED] also saw Student [REDACTED] on the other side of a wall, and when [REDACTED] became agitated, [REDACTED] heard him fall and believed [REDACTED] heard [REDACTED] head hit the ground. [REDACTED] did not directly see Ms. Ragonese physically interacting with the student.

[REDACTED] did recall that in March 2024, someone reported the way Ms. Ragonese treated student [REDACTED] during parent pick-up. Ms. Ragonese returned to the classroom the next day saying she knew who made the report. [REDACTED] observed that Ms. Ragonese would get spoken to about language but would also be told who made the report. [REDACTED] did not see Ms. Ragonese physically harming or touching the students.

[REDACTED] statements in this interview were consistent with [REDACTED] statements to HR Director Killen on October 25, 2024, in which [REDACTED] cited the same “gruff” behavior from Ms. Ragonese. See Exhibit 9 at 220-221.

11. [REDACTED] Paraeducator*

[REDACTED] is currently in [REDACTED] third year at the Bakie School, and stated [REDACTED] was only occasionally in the In-step classroom during the 2023-2024 school year but observed that Ms. Ragonese was a very loud person and swore in front of the students. [REDACTED] expressed [REDACTED] concern that because the kids were nonverbal and could not report her behavior, Ms. Ragonese took advantage of their disabilities.

[REDACTED] did not have any concerns to report for the 2023-2024 school year. During the 2024-2025 school year, [REDACTED] saw Student [REDACTED] bolting towards the door, with [REDACTED] hands flapping in front of [REDACTED] body. Ms. Ragonese ran to the door, threw her body at the door, and slammed it with such force that [REDACTED] jumped. [REDACTED] stated that Assistant Director Davine was present, and she also jumped. [REDACTED] stated Student [REDACTED] was not harmed. [REDACTED] also observed Ms. Ragonese yell at Student [REDACTED] to stop whimpering. [REDACTED] stated Ms. Ragonese would use the wall to block kids, and she would also put a student in a chair and forcefully pushed the chair right up to the edge of the table so that the student was held in a position between the chair and the table.

When asked about reporting to administration, [REDACTED] stated [REDACTED] was aware that school counselor [REDACTED] tried to report Ms. Ragonese during the 2023-2024 school year. [REDACTED] relayed that Ms. Ragonese’s response to being reported was to say she just got “a slap on the wrist”, saying it was “no big deal” and “I always get in trouble for my f’ing mouth.” [REDACTED] also observed tension between Ms. Ragonese and both BCBAs, [REDACTED] and

██████████ citing that ██████████ made Ms. Ragonese complete an incident report earlier in the year.

██████████ stated that all the Paras got together in the In-Step classroom as the allegations were being reported. ██████████ was told “██████████” (██████████ and ██████████) are going to blow up on her, and they all agreed they have “to go do something about this. [Ms. Ragonese] cannot be with these kids.” ██████████ expressed remorse for not previously reporting ██████████ observations of Ms. Ragonese but said that, at the time ██████████ didn’t believe ██████████ reports would result in any change.

██████████ statements were consistent with ██████████ statements to HR Director Killen on October 25, 2024; however, ██████████ provided additional details in this interview about observing a student in a chair pushed up against the edge of the table. See Exhibit 9 at 212-213.

12. ██████████ Paraeducator*

██████████ has been employed at the Bakie School for nineteen years. ██████████ works in the In-step classroom and described the environment as “chaotic” and having “a lot of kids with significant needs, low verbal skills, toileting [needs]” and indicated they needed help with behavior skills. ██████████ stated they were short-staffed last year for Paras, so it was tricky managing the schedule and the needed one-to-one Paras.

When working with Ms. Ragonese, ██████████ stated that “she is very direct” and “abrasive” but stated “if she liked you, you were OK.” ██████████ also said Ms. Ragonese was short with the employees. When asked how Ms. Ragonese treated the students, ██████████ stated that she was dismissive, unkind, and would make negative comments about students within the student’s earshot.

When asked if Ms. Ragonese was ever physical with the students, ██████████ stated it was “hard to say” because Ms. Ragonese was so abrasive and dismissive. ██████████ said ██████████ saw Ms. Ragonese try to move students by scooping them up and putting them into a chair during the 2023-2024 school year. ██████████ stated that Ms. Ragonese would lift the students’ feet off the ground with her armpit maneuver. ██████████ observed Ms. Ragonese put her thumb under Student ██████████ armpit, pick ██████████ off the ground, and sit ██████████ in a chair.

██████████ said Ms. Ragonese forced Student ██████████ to sit at a table by putting her hands on the student’s shoulders, pushing the student down into a chair, and holding the student in place while the student tried to get away. ██████████ said the student was “clearly upset” and was trying to push ██████████ body up and out of the chair while Ms. Ragonese kept ██████████ in place. When asked whether ██████████ made a report, ██████████ then said she thought the student could move ██████████ arms and legs and was not pinned down. ██████████ said ██████████ did not report the incident, saying ██████████ was present and made a report.²⁰

²⁰ A restraint report for this incident was not provided during the investigation.

██████████ said that ██████ heard, but did not see, an incident with Student ██████ behind the wall divider. ██████ stated Ms. Ragonese was behind the divider with this student, who became very upset. ██████ did not see what happened, stating she believed another Para, ██████, observed the incident directly.²¹

██████████ was asked about reports of Ms. Ragonese's behavior towards students. ██████ first stated ██████ was "not aware" of any reports being made; ██████ acknowledged, however, that school counselor ██████ made a report to the administration in March of 2024.

██████████ stated that Principal Childs and Assistant Principal Caffelle would sometimes observe the In-step classroom from the "outskirts" and noted that Ms. Ragonese was still fresh and "cheeky" around Assistant Principal Caffelle. ██████ described Assistant Principal Caffelle as quiet and reserved. ██████ felt that Assistant Principal Caffelle could not manage Ms. Ragonese. ██████ cited that Ms. Ragonese once met with Director Kennett, and that afterwards Ms. Ragonese said the meeting was no big deal. ██████ stated Principal Childs was out a lot last year and was not available to observe the In-step classroom. ██████ stated that Ms. Ragonese was on her best behavior during the 2024-2025 school year with Assistant Director Davine, since she was new to the building.

██████████ explained that this fall, ██████ met the other Paras in the In-step classroom, and they decided as a group that they needed to go to Human Resources. Throughout the interview, ██████ expressed that students were safe while working with Ms. Ragonese. ██████ repeatedly cited concerns over Ms. Ragonese's inappropriate language while refusing to expressly acknowledge any physical safety concerns for students.

██████████ statements were consistent with ██████ statement to HR Director Killen on October 25, 2024 in that ██████ reported observing an interaction with Student ██████ and believed that Para ██████ observed physical abuse by Ms. Ragonese. ██████ statement was inconsistent, however, in that ██████ clearly stated in this interview that students were safe working with Ms. Ragonese, yet expressed to HR Director Killen that ██████ felt ██████ had to "insulate and protect" the students from Ms. Ragonese, who was "aggressive and harsh" when handling the students. See Exhibit 9 at 214-215.

13. ██████ Registered Behavior Technician (RBT)10**

██████████ denied observing Ms. Ragonese engage in any inappropriate physical behavior with students, denied having any issues with Ms. Ragonese, and did not report any concerning behaviors. ██████ only went to the In-step classroom occasionally with students. When asked about Ms. Ragonese, ██████ acknowledged she was loud, but described her as

²¹ As noted above, ██████ did not observe the incident but reported a similar belief that ██████ observed the interaction.

“personable, funny, welcoming.” ██████ stated Ms. Ragonese would hug kids when asked liked to joke with the students.

When asked specifically if Ms. Ragonese ever touched or was physical with students, ██████ stated ██████ never saw Ms. Ragonese use anything other than a “guiding touch” and never saw anything inappropriate when Ms. Ragonese had students sit at a table to do their work. When asked if ██████ had any other concerns about Ms. Ragonese, ██████ stated she believed there were a “few personality conflicts” between employees in the In-step classroom.

14. ██████ Paraeducator**

████████ has been at the Bakie School for 2 years. ██████ was assigned to the In-Step classroom during the 2023-2024 school year.

████████ stated that Ms. Ragonese would stick her fingernails under Student ██████ armpits to transfer ██████ to another location. ██████ indicated this student often went to “room 8” and stated when ██████ walked by, ██████ would hear the student saying, “don’t hurt me” and “don’t come near me.” ██████ also witnessed Ms. Ragonese squeeze Student ██████ into a table in the hallway. ██████ happened to walk by, and there was a table outside room 8. ██████ saw Ms. Ragonese push the student into a chair, stick her knee on the back of the chair, push the chair into the table, and make it so that the student could not move. ██████ reports that the student said, “don’t hurt me” and she heard Ms. Ragonese say, “you’re fine.”

████████ stated that she observed Ms. Ragonese grab Student ██████, push ██████ into a chair, and slam the chair into the table. ██████ said ██████ was so upset by Ms. Ragonese’s treatment of this student that ██████ was almost crying. ██████ did not report this incident. ██████ stated that when Student ██████ got a scratch on ██████ body from Ms. Ragonese, that Ms. Ragonese blamed the scratch on the student.

████████ stated that Ms. Ragonese would tickle Student ██████. Ms. Ragonese picked the student off the floor, held ██████ upside down and tickled while the student laughed, and said to the student that ██████ was “the only one I can do this to.” After putting this student in a chair and pushing the student into a desk, Ms. Ragonese tickled ██████ again and said to ██████ that when she tickled ██████, she couldn’t get into trouble for restraint because ██████ is moving. ██████ also relayed that Ms. Ragonese held down a student to put medicated cream on a rash on ██████ body.

████████ indicated that Ms. Ragonese, along with Paras ██████ and ██████ bullied ██████ during the 2023-2024 school year. When ██████ complained, Ms. Ragonese treated ██████ even worse. ██████ heard Ms. Ragonese saying, “what are they going to f’ing do, fire me?” and “nobody wants this job.”²²

²² ██████ subsequently left her employment at the District and expressed a similar sentiment to HR Director Killen in her exit interview in early 2025.

██████████ stated that Principal Childs was out of the building for much of the 2023-2024 school year, and stated Director Kennett only came to the In-step classroom a few times that year. ██████████ stated that ██████████ tried to meet with Principal Childs about ██████████ concerns and was pushed off to Assistant Principal Caffelle. ██████████ told Assistant Principal Caffelle about ██████████ own mistreatment in the workplace, but did not report concerns about Ms. Ragonese's physical interactions with students. ██████████ submitted email communications regarding these reports. See Exhibit 16 at 303. When pressed further about reporting concerns of physical mistreatment of students, ██████████ stated ██████████ told Assistant Director Davine in September about Ms. Ragonese using her fingers in the students' armpits, and that ██████████ also brought that same information to ██████████. See Exhibit 26 at 500-501.

15. ██████████ Occupational Therapist**

██████████ was interviewed ██████████ ██████████
██████████
██████████ was
██████████
██████████ she was assigned to the Bakie School and worked with students in the In-step and Basics classrooms.

██████████ stated that she observed an incident that started with Student ██████████ refusing to sit down. ██████████ observed Ms. Ragonese pick up the student and "slam" ██████████ body into the ground so ██████████ would sit down. Ms. Ragonese lifted the student under their arms, picked ██████████ body up off the ground, and positioned ██████████ so that ██████████ would stay seated.

██████████ said ██████████ tried to report the incident to Principal Childs who stated she "couldn't listen and had to leave" but directed ██████████ to the school counselor, ██████████ ██████████ stated ██████████ also reported to Assistant Principal Caffelle, but did not have a clear timeline of when this incident or the reporting occurred. ██████████ was not able to provide details regarding any of these conversations, when they took place, where, or what was said to each of the administrators.

██████████ stated that ██████████ also observed student ██████████ refusing to sit down in a chair at a table. ██████████ said ██████████ observed Ms. Ragonese pick up the student and physically put ██████████ on the chair, with her hands under the student's armpits. ██████████ stated ██████████ reported this observation to Assistant Principal Caffelle, and that ██████████ had multiple conversations with Assistant Principal Caffelle about ongoing issues and how difficult ██████████ found working with Ms. Ragonese. ██████████ stated that any reports to administrators would always get back to Ms. Ragonese. ██████████ said that Ms. Ragonese created a "very hostile working environment." ██████████ said ██████████ felt targeted by Ms. Ragonese. ██████████ was moved to an alternate placement for the 2024-2025 school year.

16. Lorin Caffelle, Assistant Principal, Bakie Elementary School

Assistant Principal Caffelle is the Assistant Principal at the Bakie School. Last year, Assistant Principal Caffelle was also the special education coordinator for the building. The building coordinator role was redesigned for the 2024-2025 school year. Assistant Principal Caffelle reports to Principal Childs, who refers any special education questions to Director Kennett.

Assistant Principal Caffelle identified that she has received training in reporting child abuse and neglect to DCYF and had personally made such reports in the past. Assistant Principal Caffelle previously helped other staff members make reports to DCYF as well. Assistant Principal Caffelle stated that she was not clear on the procedure for reporting educator misconduct to the Department of Education. Assistant Principal Caffelle has been CPI trained. Assistant Principal Caffelle identified Director Kennett as running all training related to special education, including Crisis Prevention Institute (CPI) training for restraint and seclusion.

Assistant Principal Caffelle was asked about supervision in the building and stated that she had increased responsibility during the 2023-2024 school year when Principal Childs was out, particularly in March of 2024. Assistant Principal Caffelle identified that she did not currently supervise Ms. Ragonese, who reported to Principal Childs, Assistant Director Davine, or Director Kennett. Assistant Principal Caffelle identified the positions above her as the Principal, Human Resources Director, or the Director of Student Services.

Assistant Principal Caffelle did not receive any complaints about Ms. Ragonese during the 2022-2023 school year. Assistant Principal Caffelle believed that Ms. Ragonese initially appeared to create a cohesive team in the In-step classroom. During the 2023-2024 school year, Assistant Principal Caffelle stated that she frequently visited the In-step classroom and observed Ms. Ragonese working appropriately with students. Assistant Principal Caffelle felt that Ms. Ragonese was doing well in that room and that the students were making progress. When asked specifically about Ms. Ragonese's demeanor, Assistant Principal Caffelle noted her loud volume and sarcastic tone of voice but stated that Ms. Ragonese only swore or used inappropriate language without the children in the classroom.

Assistant Principal Caffelle initially stated that she received the first complaint against Ms. Ragonese in March of 2024. During her second interview, however, Assistant Principal Caffelle acknowledged that Student [REDACTED] was [REDACTED] to work with Ms. Ragonese. Assistant Principal Caffelle noted that the change was supposed to be an experiment to see if the quieter classroom and change in staff would impact [REDACTED] behavior. Assistant Principal Caffelle denied knowledge of any reports of physical mistreatment in 2023.

Assistant Principal Caffelle further denied receiving any complaints about Ms. Ragonese in February 2024; however, she acknowledged that some employees came forward in March of 2024 and questioned how Ms. Ragonese responded to students. Assistant Principal Caffelle did

not recall the specific person or people who brought forward the complaint in March of 2024. Assistant Principal Caffelle stated that she was tasked with investigating the complaint, and that she brought her notes to HR Director Rooney, who also provided guidance for written communications with Ms. Ragonese.²³ See Exhibit 3 at 39; 43-46. HR Director Rooney recommended that Assistant Principal Caffelle meet with Ms. Ragonese. See Exhibit 3 at 45. Assistant Principal Caffelle and Director Kennett met with Ms. Ragonese to discuss the reported behavior and other employees' perceptions of Ms. Ragonese's treatment of students.²⁴ See Exhibit 3 at 45 (including statements from HR Director Rooney suggests to AP Caffelle that the conversation with Ms. Ragonese "could lead to a discipline finding" and that "hopefully the discovery this afternoon will be that she is doing everything appropriately... but in the event that's not the outcome, it's time she realizes this is serious and she needs to follow the appropriate "hands-on" procedures").

When asked about the specifics of the investigation in March 2024, Assistant Principal Caffelle stated in her first interview that she "did not remember the exact complaint." Assistant Principal Caffelle explained that each In-step student has a "response plan" that identifies how staff should respond to each student's specific behaviors. Assistant Principal Caffelle believed that the complainant had simply misunderstood Ms. Ragonese's interaction with the student, but believed this interaction was based on the student's response plan, and therefore did not believe Ms. Ragonese engaged in any inappropriate conduct with this student.

Assistant Principal Caffelle was evasive in providing any more information about the nature of the complaint. When asked specifically if Ms. Ragonese was alleged to have pushed Student [REDACTED] down the hallway, Assistant Principal Caffelle stated that she does not recall that complaint. When asked if she had any specific notes about this report and response, Assistant Principal Caffelle stated she did not have any additional documentation.²⁵ When asked if she wrote down the initial complaint, Assistant Principal Caffelle stated she only had a phone conversation with "HR" (identified as Ms. Rooney), and that HR directed Assistant Principal Caffelle about next steps.²⁶ When pressed as to whether the alleged misconduct including physical mistreatment of students, Assistant Principal Caffelle stated she did not know if it was a complaint regarding physical acts against students. Finally, when prompted regarding the specific complaint made by school counselor [REDACTED], Assistant Principal Caffelle stated that she did not recall speaking to school counselor [REDACTED] about concerns regarding Ms. Ragonese last year.

During her first interview, Assistant Principal Caffelle did not acknowledge that she received any complaints about Ms. Ragonese in May of 2024. During the second interview, I

²³ Ms. Rooney maintained notes regarding a conversation with AP Caffelle. See Exhibit 3 at 39.

²⁴ Assistant Principal Caffelle denies telling Ms. Ragonese the identity of the complainant during this meeting. ²⁴

²⁵ See Exhibit 3 at 39 (Ms. Rooney's notes from her conversation with AP Caffelle).

²⁶ See Exhibit 3 at 37-38 (Ms. Rooney's notes based on a conversation with AP Caffelle). Ms. Rooney's emails with Assistant Principal Caffelle are also included, despite Assistant Principal Caffelle's statement that she did not have any follow up emails regarding this investigation.

asked more specifically about the reports from BCBA [REDACTED] and [REDACTED]. After reviewing the statements in the email from [REDACTED] in May of 2024, on which Assistant Principal Caffelle is copied, she stated that she was unsure of her specific response or what she did to respond to that situation. Assistant Principal Caffelle identified having “conversations with [Director Kennett]” about the concerns. Ultimately, Assistant Principal Caffelle stated that because she was unable to identify the specific student and staff members involved, and because she could not find any hallway video, she did not further address the concerns. Assistant Principal Caffelle did not follow up with BCBA [REDACTED], who was identified as being present, and did not ask any further questions about this report. BCBA [REDACTED] later provided information that the observations by [REDACTED] did not involve Ms. Ragonese.

Regarding the May 2024 report from BCBA [REDACTED], Assistant Principal Caffelle stated she did recall the email chain setting up a meeting between [REDACTED] and Principal Childs. Assistant Principal Caffelle did not recall being asked to do anything following that meeting, and did not take any action regarding Ms. Ragonese because of that conversation.

Assistant Principal Caffelle stated that, at the end of the 2023-2024 school year, one of the behavior analysts asked her to meet and identified this individual as Behavior Consultant [REDACTED], a former contracted provider at the Bakie School.²⁷ When asked about the notes, Assistant Principal Caffelle indicated she was unsure whether she had notes, but then almost immediately provided typewritten notes from this meeting. See Exhibit 20 at 375; see also Exhibit 29 at 534 (HR Director Killen’s timeline showing that Assistant Principal Caffelle provided typed notes of this meeting with Behavior Consultant [REDACTED] in October 2024). [REDACTED] shared information with Assistant Principal Caffelle that Student [REDACTED] was anxious around Ms. Ragonese. [REDACTED] stated that Ms. Ragonese punished this student by making them sit for a long time. [REDACTED] had received a report from another employee that this student was made to sit at a table, and despite the student trying to get out of the chair, was not allowed to get up for some time. The student was sitting in a chair, with their hands on the table, and Ms. Ragonese was behind the chair. When the student tried to get up, Ms. Ragonese would not let the student get out of the chair. Assistant Principal Caffelle stated that [REDACTED] did not disclose who made these observations.

Assistant Principal Caffelle acknowledged that [REDACTED] shared additional information about [REDACTED] own observations of concerning behavior by Ms. Ragonese during their conversation in June of 2024. This additional information included concerns that Ms. Ragonese was using “hands on vs. blocking” and too much “physical redirection” with Student [REDACTED] and that Ms. Ragonese was using “hands on physical redirection” with Student [REDACTED], Student [REDACTED] and Student [REDACTED]. See Exhibit 20 at 375. When asked during her second interview to reflect on her response to this information, Assistant Principal Caffelle stated that “nobody raised anything to the level of kids being hurt” and she did not see any “big red flags” in the

²⁷ Although Behavior Consultant [REDACTED] initially requested to meet on May 20, they were unable to schedule this meeting until June 6. See Exhibit 29 at 534.

information provided to her during the 2023-2024 school year. Assistant Principal Caffelle elaborated that the information from [REDACTED] came at the end of the school year, and that thereafter Assistant Director Davine took over supervision of the special education classrooms at the Bakie School.

Assistant Principal Caffelle stated that she brought this information, as reported by [REDACTED] to Director Kennett at the end of the 2023-2024 school year. See Exhibit 29 at 534 (HR Director Killen’s timeline of events including a June 10, 2024 meeting in which “[Assistant Principal Caffelle] met with [Director Kennett] to discuss information shared in meeting with [Behavior Consultant] [REDACTED]”). Director Kennett’s response was that some of the things they observed may have been part of the student’s response plans, as part of the required “shaping and compliance” that teachers did with students. Director Kennett expressed a concern that some of the reports were from incidents that took place several months ago, and he told Assistant Principal Caffelle to “keep an eye on things” at the start of the 2024-2025 school year.

Assistant Principal Caffelle stated that she did not follow up with Ms. Ragonese regarding [REDACTED] concerns because it was the end of the school year. Assistant Principal Caffelle received other concerns from employees about working in the In-step classroom, but the complaints were not about Ms. Ragonese’s treatment of students.²⁸ Assistant Principal Caffelle stated that some employees were moved out of the In-step classroom, but it was all due to their individual needs, and not Ms. Ragonese’s behavior. During her second interview, Assistant Principal Caffelle reiterated that anyone who left the program did so because of their own individual needs, noting it was a challenging program with challenging students.

At the start of the 2024-2025 school year, Assistant Principal Caffelle was aware of an upcoming meeting between Assistant Director Davine and Para [REDACTED]. According to Assistant Principal Caffelle, she met with Assistant Director Davine with Principal Childs to discuss their knowledge of the prior complaints by [REDACTED] the year prior. Assistant Principal Caffelle indicated that they provided Assistant Director Davine with important background information about the employee’s complaints regarding [REDACTED], and the [REDACTED]. Assistant Principal Caffelle gave the example of asking [REDACTED] [REDACTED]. After the meeting, Assistant Director Davine briefly updated Assistant Principal Caffelle and Principal Childs by saying the meeting “went well” and that most of the things [REDACTED] raised as concerns were the things from last year that were already addressed. Assistant Principal Caffelle was read the contents of Ms. Davine’s notes from the September 6 meeting, and stated she had not previously seen those notes, and that Ms. Davine had not read them aloud. Assistant Principal Caffelle did not recall Ms. Davine reading the notes to HR Director Killen at the SAU Office on October 23.

²⁸ See Exhibit 16 at 303-313 (Emails regarding the same from [REDACTED]).

On September 9, 2025, BCBA [REDACTED] complained about Ms. Ragonese making an inappropriate comment made in the hallway.²⁹ Assistant Principal Caffelle states that she met Ms. Ragonese with Assistant Director Davine and discussed using only acceptable language. Assistant Principal Caffelle stated that Ms. Ragonese was upset, said it was a hard job, and said sometimes she needed to make a joke of things. Assistant Principal Caffelle did not experience any retaliation from Ms. Ragonese after this meeting.

Assistant Principal Caffelle said that often Ms. Ragonese would go to Principal Childs as a confidante. Assistant Principal Caffelle felt “fine” when Principal Childs asked her to handle disciplinary matters with Ms. Ragonese.

When asked specifically about student safety, Assistant Principal Caffelle stated she was “never worried about student safety with [Ms. Ragonese] in the room.” Assistant Principal Caffelle then stated that, regarding this ongoing investigation, the request to place Ms. Ragonese on administrative leave was due to employees feeling uncomfortable in the room and was not initially related to student safety. Assistant Principal Caffelle agreed to send the restraint and seclusion paperwork for the In-step and Basics classroom for the 2023-2024 school year. See Exhibit 20 at 376-434.

17. Dr. Elizabeth Childs, Principal, Bakie Elementary School

Dr. Elizabeth Childs the Principal at the Bakie School and started this role in January of 2023. Principal Childs said she has prior experience as a Principal and school administrator for ten years. Principal Childs supervises the Assistant Principal at the Bakie School.

Principal Childs explained that the special education coordinator position currently falls under Assistant Director Davine but that last year, that was Assistant Principal Caffelle’s responsibility. Principal Childs explained that the special education staff were supervised by the building administrator, but that Director Kennett also oversees all special education programming and described Director Kennett as “very involved.” Principal Childs identified that if there was a concern with a special education teacher or Para, Director Kennett would oversee that concern. Principal Childs stated that Director Kennett is always “in the know” for special education concerns, and that she felt she may not always be informed of what was going on in her building.

Principal Childs stated she was aware of her obligation to report child abuse and neglect to DCYF and has reported incidents before. Principal Childs was not familiar with the reporting process of suspected educator misconduct to the Department of Education. Principal Childs stated she has attended several CPI courses but does not believe she is currently CPI certified. Principal Childs identified Director Kennett as the CPI trainer for the Bakie School staff. When

²⁹ Assistant Principal Caffelle denies telling Ms. Ragonese who brought forward the complaint because Principal Childs witnessed the incident and asked Assistant Principal Caffelle to respond.

asked about restraint and seclusion, Principal Childs stated that the staff were briefly trained by Director Kennett during the 2023-2024 school year regarding recent changes in the law.

Principal Childs stated that Ms. Ragonese “got some pushback from the Paras” in the In-step classroom related to working with challenging students, but that she did not receive any complaints about Ms. Ragonese when she started her role. Principal Childs said Ms. Ragonese had good relationships with some of the kids. Principal Childs stated Ms. Ragonese was good at redirecting student behaviors, and that the students responded to Ms. Ragonese but were not afraid of her. Principal Childs stated Ms. Ragonese’s demeanor was appropriate, direct, and clear, and the students responded to that in a way that was appropriate.

During the 2023-2024 school year, Principal Childs received multiple complaints about Ms. Ragonese. The first complaint, at an uncertain date, was made by [REDACTED], who came to Principal Childs and Assistant Principal Caffelle, and stated that Ms. Ragonese was “triggering” Student [REDACTED] in her classroom. Principal Childs states she asked Assistant Principal Caffelle to review the concerns and believed Assistant Principal Caffelle was working with Director Kennett to investigate the reported allegations. Principal Childs stated that Assistant Principal Caffelle and Director Kennett did not have a “black and white answer” as an outcome for the investigation, and as such, Principal Childs did not have a follow-up conversation with Ms. Ragonese to address her concerns.

The second complaint involved allegations from Behavior Consultant [REDACTED]. Principal Childs was aware that [REDACTED] had additional complaints and information regarding Ms. Ragonese, but did not recall the specifics of these complaints. According to Principal Childs, Assistant Principal Caffelle was working with Director Kennett and [REDACTED] to implement the specific plan³⁰ for this student, but Principal Childs was not able to provide any further details about [REDACTED] allegations.³¹

The third complaint in the 2023-2024 school year came in March of 2024. Principal Childs was absent on the day the complaint came to the attention of the administration, stating she was out of work several days in March. Principal Childs states that she was made aware that someone went to HR Director Rooney and complained about a staff member not following the CPI model. Principal Childs stated that is “all she knows.” Principal Childs stated that nothing was reported directly to her, she believed Assistant Principal Caffelle was “working on it” with HR, and she only heard “through the grapevine” that “HR” (identified as Ms. Rooney) was contacted. Principal Childs does not recall if a restraint report was completed and that she trusted Assistant Principal to complete the necessary forms. Following the investigation, Principal

³⁰ BCBA [REDACTED] completed a detailed, unique FBA for this student, with [REDACTED] from [REDACTED] that resulted in a very specific behavior plan to address the student’s challenges, and Principal Childs was referring to the outcome of this FBA when stating the employees were working on this student’s “plan”.

³¹ According to Behavior Consultant [REDACTED] statement dated April 8, 2025, Director Kennett did not reach out to her directly regarding implementation of the plan, as created by BCBA [REDACTED] and [REDACTED] (see note 29, above).

Childs called the CPI team together and they reviewed protocols, discussed strategies, and discussed how to manage a challenging situation.

A fourth complaint about Ms. Ragonese was received in May of 2024 and again came from [REDACTED] Principal Childs states that [REDACTED] asked to meet on a Friday. A review of emails in Exhibits 2 and Exhibit 4 confirms this request and that Principal Childs quickly replied. See Exhibit 2 at 9-10; Exhibit 4 at 47. When Principal Childs met with [REDACTED] on the following Monday, Assistant Principal Caffelle was present, and Principal Childs asked Assistant Principal Caffelle to respond to the concerns. According to Principal Childs, [REDACTED] stated Ms. Ragonese was “triggering” students. Principal Childs stated that nothing further came of that meeting but that Assistant Principal Caffelle went to Director Kennett to complete the investigation. Principal Childs did not receive any further reports and believed Assistant Principal Caffelle and Director Kennett had nothing further to share. Principal Childs did not request any further information from Assistant Principal Caffelle or Director Kennett.

Principal Childs stated that she did not receive any further complaints at the end of the 2023-2024 school year or over the summer of 2024. Principal Childs attributed staff members leaving the In-step classroom to their own personal concerns about working in that room.

Principal Childs stated that at the start of the 2024-2025 school year, Ms. Ragonese made a hurtful comment to a Para in the In-step classroom about [REDACTED] Principal Childs indicated that she was aware of a conversation that took place between Assistant Director Davine and Para [REDACTED] on September 6, 2024. Principal Childs stated that she did receive information from Assistant Director Davine after that meeting but was adamant that Ms. Davine did not provide any information regarding mistreatment of students. Principal Childs recalled that Para [REDACTED] shared concerns about [REDACTED] with Assistant Director Davine. Principal Childs stated that if she had received information regarding physical abuse of students, she would have responded as she did in October. Principal Childs was shown the notes from the September 6 meeting and responded that she didn’t recall details, but that if she had any knowledge of student abuse, she would have responded as she did in October. Principal Childs stated that she would follow up on any actionable items, and that specifically, if she was aware of anything actionable or aware of any student mistreatment, she would have been the first to respond.

A few days later, on September 9, 2024, Principal Childs witnessed Ms. Ragonese shout across the hallway to [REDACTED] that her “[REDACTED]” did well during a fire drill, referring to Student [REDACTED] Principal Childs stated that Assistant Director Davine and Assistant Principal Caffelle addressed the stated concerns with Ms. Ragonese in terms of professional communications and relationships. Principal Childs did not have further information about the outcome of that conversation.

In October of 2024, Principal Childs met with BCBA [REDACTED] and Assistant Director Davine regarding complaints from two Paras about Ms. Ragonese. After communicating with HR Director Killen and the Superintendent, and learning that HR Director Killen was assigned to

review the complaints, Principal Childs met with HR Director Killen. Principal Childs was not involved further in the response to the October complaint that led to this investigation. Upon reviewing text messages that she exchanged with Assistant Director Davine, Principal Childs indicated that she was no longer involved once the SAU Office and her superiors took over the investigation and response. See Exhibit 31 at 558-560.³²

Principal Childs concluded that if she had thought Ms. Ragonese was “unsafe around kids, and had specific information regarding reasons to believe that, [she] would have put [Ms. Ragonese] on leave at an earlier point.” Principal Childs stated she really didn’t know what was going on, besides staff feeling unsafe and uncomfortable reporting. Principal Childs stated she didn’t have any knowledge or information to tell her that the kids were unsafe.

18. Meredith Davine, Assistant Director of Student Services, SAU # 17

Meredith Davine is the current Assistant Director for Student Services at the Bakie and Memorial schools and started this role in July 2024. Her duties include supervising special education teachers, case managers, and Paras in the elementary special education programs. She previously served as the Assistant Principal and Special Education Coordinator at the Memorial School. Assistant Director Davine engaged in a second interview on April 11, 2025 with Attorney Ann Rice present. During this interview, Assistant Director Davine explained her transition in July, 2024 to her new role as the Assistant Director of Student Services. She identified her director supervisor as Director Kennett. She did not receive any additional training as she took on her new role, stating that she met with Director Kennett about the new action items and meetings she needed to attend. Prior to taking on this new role, Assistant Director Davine had no knowledge of Ms. Ragonese or her performance at the Bakie School.

Assistant Director Davine indicated that she received information about Ms. Ragonese from a few Paras at the start of the year. Assistant Director Davine stated these reports were focused on the way Ms. Ragonese treated other employees, specifically the Paras in the In-step classroom. Assistant Director Davine stated she was aware that one Para (██████████) left Ms. Ragonese’s room at the end of the prior school year, but, during her first interview, Assistant Director Davine stated she did not receive any reports about physical mistreatment of students. Assistant Director Davine confirmed that she met with Ms. Ragonese this fall with Assistant Principal Caffelle. This meeting focused on inappropriate comments and was not related to physical mistreatment of students. Assistant Director Davine followed up this conversation with an email reminder that Ms. Ragonese was expected to “continue to be mindful of demonstrating a professional demeanor and obtaining appropriate boundaries.” See Exhibit 4 at 53.

During her second interview, Assistant Director Davine stated that upon starting the new school year at the end of August, 2024, she received a request from Para ██████████ to meet about ██████████ placement for the 2024-2025 school year. ██████████ had been placed into a second-grade classroom for the new school year; however, due to a poor experience with Ms.

³² Principal Childs was asked about these messages during her second interview on April 24, 2025.

Ragonese the prior year, [REDACTED] wanted to meet with Assistant Director Davine to explain [REDACTED] fear of returning to the In-step classroom. During this conversation, Assistant Director Davine took contemporaneous notes. See Exhibit 26 at 500-501. [REDACTED] raised two concerns for the purpose of explaining why [REDACTED] did not want to return to the In-step classroom. The first reason was personal, [REDACTED] [REDACTED] told Assistant Director Davine that this concern was raised to the school administration team the year before. [REDACTED] second concern was about how Ms. Ragonese treated students. Assistant Director Davine's notes indicate that [REDACTED] said:

In step Last year: [REDACTED] have own little click. Witnessed being mean to other staff members that have not been down there. Witnessed them being abusive with the kids, when Aimee transports kids she sticks fingernails in armpits to get the kids to do what she wants. Watched her push a kid behind a table and sit behind them so they could not move, but tickled them so they moved and Aimee said she cant be reported because they moved. Heard Amy say "what are they going to do, fire me" know one wants to do my job. Watched her pick up a kid over her shoulder hanging upside down saying [REDACTED] likes this [REDACTED] is the only kid I can do this with. See Exhibit 26 at 500.

Assistant Director Davine stated she took two steps in response to this information. First, she had a phone call with Director Kennett. Assistant Director Davine could not recall the exact level of detail she provided to Director Kennett. She believed she would have explained both the personal concern and the student abuse observations with Director Kennett, but did not recall the exact details of the conversation. See Exhibit 26 at 501 (confirming follow-up conversation regarding Para [REDACTED] interview later that month). Assistant Director Davine emailed Director Kennett several times asking how she should handle the notes she took during that interview, as they were being requested by Para [REDACTED]. See Exhibit 26 at 512-515.

Second, Assistant Director Davine spoke to both Principal Childs and Assistant Principal Caffelle. On September 6, Assistant Director Davine emailed Principal Childs and Assistant Principal Caffelle, requesting to meet to discuss a concern regarding students. See Exhibit 26 at 501. Assistant Director Davine stated that she brought her computer into Principal Childs' office and read her notes from the conversation with [REDACTED] to Principal Childs and Assistant Principal Caffelle. Although Assistant Principal Caffelle remained quiet during this conversation, Principal Childs was actively engaged in the conversation, reading over Assistant Director Davine's shoulder while she went through the details in her notes.³³

³³ Assistant Director Davine stated that she has a prior working relationship with Assistant Principal Caffelle, and that it was her nature to be quiet, but that she was generally known for completing her work.

I asked Assistant Director Davine about her statement to me in December 2024, at which time she told me she was supposed to meet with Ms. Ragonese as a follow up, but it never happened. Assistant Director Davine stated that she could not recall that exact exchange, and that her recollection was that she did meet with Ms. Ragonese several days later to address professional boundaries. During this conversation, Assistant Director Davine did not discuss any concerns of physical abuse, only the allegations of unprofessional conduct made by [REDACTED]. Assistant Director Davine followed up this conversation with an email to Ms. Ragonese, thanking her for her “candor” and including a reminder about expectations for professionalism going forward. See Exhibit 27 at 519.

Assistant Director Davine expressed her belief that, after the meeting with Ms. Ragonese and Assistant Principal Caffelle, there were not any further concerns to be addressed. When asked why she reported, in her first interview, that she did not receive reports of abuse from [REDACTED], Ms. Davine clarified that the only reports of mistreatment were regarding prior observations that Ms. Davine believed had been handled by Assistant Principal Caffelle and Principal Childs the year prior, given that [REDACTED] had been moved from the In-step prior to the end of the 2023-2024 school year, and had not returned at the start of the 2024-2025 school year. This conversation also took place fewer than 10 days into the start of a new school year. She had reported the allegations from [REDACTED] to the Principal, Assistant Principal, and Director of Student Services, and was told that the allegations had been handled the prior year. She was directed to meet with Ms. Ragonese specifically regarding professionalism boundaries, and she followed that directive. See Exhibit 27 at 519.

Assistant Director Davine stated that throughout the beginning of the school year, she was building her relationship with Ms. Ragonese. She described Ms. Ragonese as “tough” but stated she did not see any specific concerning behavior and never witnessed any incidents of physical misconduct by Ms. Ragonese.

During her first interview, Assistant Director Davine explained that she became aware of reports of physical mistreatment of students in October 2024, when two Paras (identified as [REDACTED]) came to her to report concerns about Ms. Ragonese. Initially, Assistant Director Davine was told that Ms. Ragonese was “treating [Student] [REDACTED] like shit” and was “almost bullying [REDACTED]” and that her behavior was “ramped up.” The Paras stated that they were concerned about retaliation from Ms. Ragonese. Eventually, during individual interviews with each of these Paras on October 24, Assistant Director Davine was told that Ms. Ragonese put her fingernails under the armpits of students to get them to move (citing students [REDACTED], and one other). Assistant Director Davine stated that she then met with Principal Childs and one other person, identified as BCBA [REDACTED] a few days later. After interviewing the two Paras on the 24th, Assistant Director Davine was not further involved in the response to this complaint.

During her second interview, Assistant Director Davine acknowledged that, in total, she received three first-hand accounts of Ms. Ragonese physically abusing students. The first was from Para [REDACTED], on September 6, which she immediately related to Principal Childs and Assistant Principal Caffelle. The second and third were Paras [REDACTED], whom she interviewed on October 24, 2025 at the direction of HR Director Killen. See Exhibit 26 at 498-499. Assistant Director Davine did not make any personal observations of physical abuse of students by Ms. Ragonese, and did not receive any other reports of observations of specific incidents of physical abuse of students by Ms. Ragonese.

19. Dr. Troy Kennett, Director of Student Services, SAU # 17

Troy Kennett is the District's current Director of Student Services and was previously the Principal at the Bakie School. His direct reports include Assistant Director Davine, BCBA Ms. Wijzen, and BCBA Ms. Wooding, among others. He also oversees special education teachers, related service providers, and Paras including Speech and OT, among others. Director Kennett had specific training including certification in special education and certification as an administrator (Principal). When asked about his responsibility for overseeing the special education programs, Director Kennett stated, in both interviews, that the building administration is ultimately responsible for those classrooms.

Director Kennett instituted the "crisis response teams" in the District and has trained many employees in the District on crisis response.³⁴ Director Kennett provided copies of all recent restraint reports related to the In-step classroom.³⁵ Director Kennett stated that if Paras were engaged in an incident of intentional physical contact ("IPC"), they would make a report to the teacher in the classroom, which would then be reviewed by the administration.³⁶

Director Kennett interviewed and hired Ms. Ragonese for her position when he was the Bakie School Principal. Director Kennett stated that, initially, Ms. Ragonese "knew her stuff" and could "speak the language" as a BCBA. Director Kennett reflected that Ms. Ragonese was "rough around the edges" and that he had to correct her a few times for her language, but that she did not appear to be shaken by difficult student behaviors.

Director Kennett was involved in responding to a complaint against Ms. Ragonese during the 2023-2024 school year. Director Kennett sat in for Principal Childs at a meeting between Assistant Principal Caffelle and Ms. Ragonese.³⁷ Director Kennett stated Assistant Principal

³⁴ Director Kennett provided the "SRSD Crisis Response Procedures, Processes, Protocols and Policies." See Exhibit 11.

³⁵ The reports provided by Director Kennett are contained in Exhibit 14. Notably, these documents do not include the report of seclusion allegedly completed by [REDACTED] and Ms. Ragonese, as referenced in [REDACTED] statement above; nor do they include a report of restraint referenced in [REDACTED] statement above. See Exhibit 14.

³⁶ Director Kennett did not provide any IPC incident reports when he gave me the recent restraint/ seclusion reports from the In-step classroom.

³⁷ (Note, Assistant Principal Caffelle stated that Director Kennett was included at his own request, not sitting in for Principal Childs.)

Caffelle investigated a complaint about Ms. Ragonese's treatment of a student in the hallway and determined that Ms. Ragonese was only prompting the student to move by placing her hand on the student's back. Director Kennett did not take an active role in this investigation.³⁸ During this meeting, Assistant Principal Caffelle and Director Kennett reviewed reported perceptions and appropriate use of tone of voice with Ms. Ragonese. Director Kennett was not aware of any complaints of retaliation by Ms. Ragonese following this meeting.³⁹

Director Kennett initially stated he did not recall if [REDACTED] brought forward any complaints about Ms. Ragonese. Director Kennett was aware, however, that BCBA [REDACTED] complained about Ms. Ragonese working with Student [REDACTED] in November 2023. During his second interview, Director Kennett explained that he did not receive any reports that Ms. Ragonese was harming Student [REDACTED] but rather that it was "not a good fit" for the student and Ms. Ragonese to work together in the In-step classroom. When asked about other specific students, during his first interview, Director Kennett replied he was unaware of any complaints. During his second interview, Director Kennett stated that when [REDACTED] brought forward concerns, his response was that she needed to meet with Principal Childs and Assistant Principal Caffelle. Director Kennett felt he was accessible if the Principal or Assistant Principal needed him, but he stated that the BCBA should be going directly to the building administration if she had anything that was "actionable." Director Kennett further explained that he believed BCBA [REDACTED] reports often lacked specificity. Director Kennett stated that he "didn't work in the building, so [the] assistant directors took care of the day-to-day stuff." Director Kennett did not believe that he had reviewed any prior reports of restraint by Ms. Ragonese that were concerning.

During the second interview, Director Kennett was asked about the emails sent by contracted BCBA [REDACTED] in May 2024.⁴⁰ His response was that he directed Assistant Principal Caffelle to follow up with the concerns. When asked to reflect on the response by the

³⁸ See Exhibit 3 at 39 (HR Director Rooney's notes from a conversation with Director Kennett, in which Director Kennett told Director Rooney he would speak to [REDACTED] and Assistant Principal Caffelle and attend the meeting with Ms. Ragonese with Assistant Principal Caffelle).

³⁹ Director Kennett did not recall providing Ms. Ragonese with the identity of the individual who brought the complaint forward.

⁴⁰ [REDACTED] provided documentation that [REDACTED], a contracted psychologist from [REDACTED], was hired to conduct an independent evaluation of Student [REDACTED]. [REDACTED] raised concerns that Ms. Ragonese was withholding food from students, and these concerns were brought to Director Kennett and Assistant Principal Caffelle. Director Kennett's written response in an email was to say that "I know [Assistant Principal Caffelle] will follow up with anything that was deemed questionable." See Exhibit 2 at 16. [REDACTED] further provided documentation that [REDACTED] observed an "unknown female" with a [REDACTED] student and saw the female adult "holding a student's hand despite the student pulling their body away and clearly attempting to go in the opposite direction. . . the adult pulled the child in their direction." [REDACTED] indicated [REDACTED] was present for this interaction.. Director Kennett responded "We are [i]n receipt of your observation and concern. [Assistant Principal Caffelle] will look into the situation. Thank you for letting us know." Exhibit 2 at 18. [REDACTED] communication on March 27, 2025 indicated that [REDACTED] email did not reference Ms. Ragonese.

District, Director Kennett said he would have directed Assistant Principal Caffelle to “take action” if there were any “actionable item.” Director Kennett did not have any further information regarding this complaint or the District’s response.

Director Kennett was aware that Assistant Principal Caffelle and Principal Childs received employee complaints about the In-step classroom at the end of the 2023-2024 school year. Regarding the several employees that requested transfers out of the In-step classroom at the end of the 2023-2024 school year, Director Kennett stated that because the program is difficult, staff members often burn out, and he recalled that each employee requesting a transfer did so for their own reasons, unrelated to Ms. Ragonese’s treatment of students.

When asked about his conversation with Assistant Principal Caffelle about the complaint from Behavior Consultant [REDACTED], Director Kennett did not recall hearing [REDACTED] concerns. Director Kennett clarified that because he “deals with a lot of instances” that “nothing [is] jumping up.” Director Kennett then questioned if HR was involved in this response, and stated he assumed it was investigated because that was the District’s standard practice.

Director Kennett denied that anyone else came forward this summer with a complaint that Ms. Ragonese physically mistreated students. When asked during his first interview whether he spoke to Para [REDACTED] this summer about Ms. Ragonese, Director Kennett stated it was “not standing out in [his] head.” Director Kennett denied speaking to [REDACTED] because the Extended School Year (“ESY”) program was at the middle and high school this summer, and so he stated he did not go to the Bakie School during the summer of 2024. Director Kennett denied any knowledge that Ms. Ragonese used the fingernail technique under students’ armpits.

Director Kennett was aware that Assistant Director Davine received some complaints at the start of the 2024-2025 school year, but he was not aware of the details of this complaint. Director Kennett stated that it was Assistant Director Davine’s responsibility to bring the details forward to the administration and to him for any “actionable” complaint. Director Kennett thought that Ms. Ragonese did not require any performance or improvement plan at the start of the 2024-2025 school year. Director Kennett stated that the first time he learned of any physical behavior by Ms. Ragonese during the 2024-2025 school year was the allegation that led to this investigation.

20. Ms. Kelli Killen, current Human Resources Director, SAU # 17

Kelli Killen began her employment as the District’s Director of Human Resources in March of 2024. When she first took over, the prior HR Director, Ms. Diana Rooney, was still working for the District and spent approximately one month transitioning the workload over to HR Director Killen.

HR Director Killen was not involved in the investigation regarding allegations that Ms. Ragonese pushed a student down the hallway in March of 2024. Former HR Director Rooney handled that matter. HR Director Killen was not aware of any additional complaints against Ms. Ragonese during the 2023-2024 school year or over the summer of 2024. HR Director Killen

received a complaint against Ms. Ragonese on October 23, 2024. The complaint, sent by [REDACTED] via email, stated that a Para had approached her with concerns about how Ms. Ragonese was treating students and adults. Following initial interviews and consultation with outside legal counsel, Ms. Ragonese was placed on leave on October 28, 2024. See Exhibit 4 at 105; Exhibit 13; Exhibit 6 at 180.

HR Director Killen provided several Exhibits used in this investigation. HR Director Killen provided the personnel file of Ms. Ragonese, showing that Assistant Principal Caffelle and Principal Childs continued to rate Ms. Ragonese highly throughout the 2023-2024 school year. See Exhibit 5 at 63-82. HR Director Killen also provided notes from [REDACTED] the former contracted behavior analyst that worked in the In-step classroom during the 2023-2024 school year. See Exhibit 7 at 183. HR Director Killen provided a timeline for the initial steps in response to the investigation. See Exhibit 8 at 206. Finally, she provided notes from the initial interviews of Paras completed at the Bakie School on October 28, 2024. See Exhibit 9 at 210. HR Director Killen also provided emails documenting the steps taken by the Administration in response to the allegations as they unfolded on or about October 23, 2024 through October 28, 2024 and included a timeline of events regarding the same. See Exhibit 29 at 531-552.

21. Dr. Thomas Ambrose, Superintendent, SAU # 17

Dr. Thomas Ambrose was interviewed for the purpose of understanding when he first learned of complaints that Ms. Ragonese was harming students. Superintendent Ambrose did not receive, and was not aware of, any complaints during the 2023-2024 school year. Superintendent Ambrose learned that a complaint had been made against Ms. Ragonese in October of 2024.

Superintendent Ambrose stated his response was to ask HR Director Killen to handle the initial review by the District. Superintendent Ambrose explained that, over the next several days, the District collected information, conducted initial interviews, and ultimately placed Ms. Ragonese on paid administrative leave on October 28, 2025. See Exhibit 28 at 529-530 (timeline for October investigation provided by Dr. Ambrose). Superintendent Ambrose accepted Ms. Ragonese's resignation while the investigation was pending.

22. [REDACTED], RBT, Behavior Consultant

[REDACTED] worked at the Bakie School as an RBT and Para for thirteen years. During the 2023-2024 school year, [REDACTED] returned to the Bakie School as a contracted Behavior Consultant but was not yet a board-certified behavior analyst. [REDACTED] was supervised by [REDACTED] contracting agency and received additional guidance and support from BCBA [REDACTED]⁴¹ BCBA [REDACTED] was [REDACTED] "first point of contact and whom [REDACTED] was told to work under by Director Troy Kennet." See Exhibit 30 at 553. [REDACTED] was regularly in the In-step classroom. [REDACTED] stated [REDACTED] created entries into a spreadsheet for review by [REDACTED]

⁴¹ Both BCBA [REDACTED] and Behavior Consultant [REDACTED] emphasized in statements dated March 27, 2025 and April 8, 2025, respectively, that they did not have an official supervisor-supervisee relationship, as [REDACTED] was contracted through an agency.

█████ based on her observations in the classroom. See Exhibit 7 at 183. Although █████ believed this document, that was created by █████, was being reviewed by █████, █████ did not confirm such review. █████ described Ms. Ragonese as unreasonable in her treatment of students and █████ found Ms. Ragonese to be reactive to student behavior.

█████ was asked about a few specific entries on this spreadsheet. █████ was asked about an entry on December 11, 2024. See Exhibit 7 at 183. █████ explained that Ms. Ragonese took Student █████ under the armpits and moved █████ without following the proper CPI procedures. █████ had previously been trained in CPI, and stated █████ felt qualified to recognize when Ms. Ragonese engaged in inappropriate physical contact with students without following the CPI model. █████ believed that moving a student by the armpits was not an appropriate CPI technique and was not an appropriate way to engage students. After making this observation, █████ noted it on the spreadsheet.

█████ was asked about an entry on February 20, 2024. See Exhibit 7 at 185. █████ was walking through the hallway towards the Basics classroom. █████ recalled that Ms. Ragonese, Para █████ and the School's School Resource Officer ("SRO") were all present as part of the crisis response team. █████ saw Ms. Ragonese sit in a chair behind the student's chair at a table in the hallway. Ms. Ragonese then pushed the student against the table so that █████ belly was forced up against the table. The student said "█████ help me" and Ms. Ragonese responded "█████ can't help you now." █████ suggested moving the table to assist with the student's positioning and Ms. Ragonese refused. The student stated █████ would pee on Ms. Ragonese. After taking the student to the bathroom, Ms. Ragonese pushed the student into a bent-over position against the front of the toilet, forcing █████ into this position by pushing on the student's shoulders. █████ recalled the student's legs were pushed up against the front of the toilet at an odd angle. The student did not go to the bathroom. Ms. Ragonese then took the student to Room 8, and █████ saw Ms. Ragonese pushing the student backwards into the room after the Student tried to grab at Ms. Ragonese to escape. Finally, █████ said the student was starting to calm down when Ms. Ragonese antagonized the student by calling █████ "█████" instead of █████ preferred name of "█████" and the student escalated again. █████ states she spoke on the phone with █████ after this incident, but did not report █████ observations to anyone else. █████ included detailed notes of the incident and █████ phone call to BCBA █████. See Exhibit 19 at 345-346.

█████ was asked about an entry from June 5, 2024. See Exhibit 7 at 186-187. █████ explained that Para █████ came to █████ and told █████ about an incident when Ms. Ragonese forced Student █████ to sit in one place for a long time as a punishment. █████ discussed this information with █████ and then brought the information to Assistant Principal Caffelle. During █████ conversation with Assistant Principal Caffelle on June 6, 2024, █████ also explained █████ observations from the February 20 incident. █████ states Assistant Principal Caffelle was taking notes during their conversation. █████ recalls Assistant Principal Caffelle stating she would bring the concerns about Ms. Ragonese to Director Kennett. Following the meeting, █████ sent an

email to Assistant Principal Caffelle, Director Kennett, and Principal Childs. [REDACTED] did not receive a response. Upon leaving the District, [REDACTED] also emailed HR Director Killen requesting a meeting, but it never took place. See Exhibit 19 at 326.

[REDACTED] described Ms. Ragonese as manipulative. [REDACTED] stated that [REDACTED] observed an interesting dynamic between Ms. Ragonese and Assistant Principal Caffelle during IEP meetings, in which Assistant Principal Caffelle refused to correct Ms. Ragonese, even when Ms. Ragonese made inaccurate statements during the meeting. [REDACTED] explained her observation that since Assistant Principal Caffelle was the LEA during the 2023-2024 school year, she would not undermine Ms. Ragonese as the special education teacher and a BCBA. [REDACTED] felt that the Paras were in a difficult position as their employment was inferior to that of the teachers and administrators, all of whom were perceived to be superior to the Paras. Finally, [REDACTED] stated she had a phone call with [REDACTED] in November of 2024, in which [REDACTED] stated she had only just read [REDACTED] notes in detail from the 2023-2024 school year. [REDACTED] expressed a belief that her notes were being reviewed throughout the 2023-2024 school year.

23. [REDACTED] former Paraprofessional⁴²

[REDACTED] stated [REDACTED] was employed at the Bakie School as a Paraprofessional for approximately one and a half years, from November 2022 to April 1, 2024.⁴³ [REDACTED] worked in the In-step classroom and the general education classrooms. [REDACTED] stated that while Ms. Ragonese was initially nice to work with, that she became more difficult and “mean” after Ms. Ragonese experienced a [REDACTED]

[REDACTED] observed Ms. Ragonese use her fingertips and press them into Student [REDACTED] armpits, stating [REDACTED] observed Ms. Ragonese use pressure when she employed this maneuver. [REDACTED] stated [REDACTED] observed Ms. Ragonese engage with Student [REDACTED] in this way when the student refused to leave her classroom to go to the In-step classroom. Ms. Ragonese also observed Ms. Ragonese place Student [REDACTED] in the movable wall alone. [REDACTED] observed Ms. Ragonese push Student [REDACTED] on the shoulders, so that the student fell backwards onto a table.

Finally, [REDACTED] stated that Ms. Ragonese “bullied” [REDACTED] stating that [REDACTED] “two friends” would report things that [REDACTED] said to Ms. Ragonese, and that Ms. Ragonese would then admonish [REDACTED] with her two friends present. These friends were identified as Paras [REDACTED]. [REDACTED] stated she talked to Paras [REDACTED] and [REDACTED] and reported [REDACTED] observations to an individual named [REDACTED] but did not share details of [REDACTED] observations with anyone else.

⁴² [REDACTED] was contacted for an interview in February and stated that [REDACTED] had been unavailable but returned my phone call on March 3, 2025.

⁴³ [REDACTED] left for personal reasons in April 2024.

IV. FINDINGS OF FACT

Based on a detailed review of the witness statements and documents as outlined above, I make the following findings of fact by a preponderance of the evidence.

A. Treatment of Students

Ms. Ragonese was a very loud and vocal person and used an abrasive tone with students in the classroom. Ms. Ragonese told students they were gross, told them to stop whimpering when they were upset, and demanded that they shut up. Even witnesses who stated they did not observe Ms. Ragonese engage in any inappropriate physical mistreatment of students, such as Para [REDACTED] acknowledged Ms. Ragonese's tendency to use rough and abrasive language. Ms. Ragonese continued or increased her aggressive tone and demeanor at the start of the 2024-2025 school year.

Ms. Ragonese repeatedly used two tactics to manipulate students in the classroom. The first was to place her thumb or fingers into a student's armpits to make the student stand up, move, sit, or relocate within the classroom or hallway. For example, Para [REDACTED] observed this behavior and explained that Ms. Ragonese would make students walk on "tippy-toe" and that the students would say "you're hurting me" when Ms. Ragonese pushed her fingers under their armpits and made them move in the classroom or hallway. [REDACTED] explained that Ms. Ragonese would use her fingertips as a "pressure point" underneath the student's armpits.

The second tactic used by Ms. Ragonese was to restrain students by pushing their chair firmly into a table. Restraint is defined as any action that "immobilizes a person or restricts the freedom of movement of the torso, head, arms, or legs." See Exhibit 22 at 437 (Board policy JKAA). Ms. Ragonese would pull her own chair behind the student and hold the student's chair in place, so that the student was stuck in the chair, with their stomach pressed against the table. In this position, students were unable to move their torso. For example, Para [REDACTED] observed Ms. Ragonese put multiple students into a chair and push them right up to the edge of the table and hold them in place. Para [REDACTED] indicated that sometimes Ms. Ragonese would combine these two tactics, by first using her thumbs to move a student to the chair before forcing the student's chair up against the table.

In addition to finding that these two tactics were regularly used by Ms. Ragonese on the students in the In-step classroom throughout the 2023-2024 school year, I also find that the following specific incidences occurred during the 2023-2024 and 2024-2025 school years regarding each student listed below.

i. [REDACTED]

I find that Ms. Ragonese grabbed Student [REDACTED] by the neck while [REDACTED] was seated at the classroom window and dug her fingernails into [REDACTED] back. As a result, the student started bleeding. Para [REDACTED] saw this incident take place, including the blood and fingernail marks on the student's skin. Ms. Ragonese showed concern that she may have scratched this same student on

another occasion and asked Para [REDACTED] to check this student for scratch marks. [REDACTED] report was sufficiently detailed to be credible, and is corroborated by the finding, above, that Ms. Ragonese regularly used this technique on students in the In-step classroom.

I find that Ms. Ragonese used force on multiple occasions to pick-up or push Student [REDACTED] across the In-step classroom as observed by Para [REDACTED]. Ms. Ragonese picked up this student by using her fingernails under the student's armpits and left bloody scratch marks. [REDACTED] also observed Ms. Ragonese use her whole hand to pick the student up under the armpits to make [REDACTED] move throughout the classroom. [REDACTED] saw Ms. Ragonese grab the student around the middle and push [REDACTED] across the room. Paras [REDACTED] and [REDACTED] also observed Ms. Ragonese, on separate occasions, use the thumb of her hand and place it into this student's armpit to force [REDACTED] to move into a chair.

The above reports are not contradicted by the report of Para [REDACTED] who stated that Ms. Ragonese only guided the student to a chair. [REDACTED] was not regularly in the In-step classroom, and although [REDACTED] may have observed Ms. Ragonese guide students appropriately across the room, I nevertheless credit the similar statements of [REDACTED] as corroborated by the general observations of [REDACTED] that Ms. Ragonese repeatedly used force to manipulate this student's body.

ii. [REDACTED]

I find that Ms. Ragonese placed her hands under Student [REDACTED] armpits and moved or dragged [REDACTED] across the floor while the student resisted the movement, as observed by [REDACTED]. In another similar instance, I find that Ms. Ragonese used her thumb in this student's armpit to move [REDACTED] off the floor while the student said, "don't hurt me" as [REDACTED] was being moved, as observed by [REDACTED] multiple times and as observed by [REDACTED]. These observations are corroborated by [REDACTED] who indicated Ms. Ragonese was rough with this student.

In another similar incident, I find that Ms. Ragonese pushed the student down the hallway with [REDACTED] arms under the armpits while [REDACTED] feet were dragged along the floor. This observation was made by [REDACTED]. Although this allegation was allegedly reviewed or investigated by Assistant Principal Caffelle with assistance from HR Director Rooney, I do not credit the statement of Assistant Principal Caffelle that Ms. Ragonese was merely guiding the student down the hallway. Assistant Principal Caffelle was not credible in her recollection of this investigation, stating she no longer had any written documentation and refusing to acknowledge that she investigated any physical misconduct by Ms. Ragonese. The video of this incident was not provided. The observations of [REDACTED] are sufficiently specific with detail regarding the way Ms. Ragonese physically manipulated this student. Furthermore, [REDACTED] faced significant mistreatment by Ms. Ragonese in response to making this report but never changed her story about what she observed. Her report during this investigation was consistent with the notes of the investigation maintained by HR Director Rooney, which supports the credibility of [REDACTED] report. I find by a preponderance of evidence that this student was pushed down the hallway by Ms. Ragonese.

I find that Ms. Ragonese often used the movable wall dividers with Student [REDACTED] and that [REDACTED] would repeatedly spend a large portion of [REDACTED] day behind, or within, a movable wall, as observed by Paras [REDACTED]. Seclusion is defined as “the involuntary placement of a child alone in a place where no other person is present and from which the particular child is unable to exit, either due to physical manipulation by a person, a lock, or other mechanical device or barrier.” See Exhibit 22 at 437 (Board policy JKAA). I find that when this student was placed behind the wall, sometimes a Para would be present to observe the student, but that sometimes the student was left alone without supervision and effectively secluded through use of the wall barrier as observed by [REDACTED].

iii. [REDACTED]

I find that Ms. Ragonese forcibly picked up this student by [REDACTED] armpits and moved [REDACTED] to a chair. The student rubbed [REDACTED] armpits after sitting down, as observed by Para [REDACTED]. Ms. Ragonese also placed her hands on this student’s shoulders and pushed [REDACTED] down into a chair. Ms. Ragonese held the student’s chair in one place while the student attempted to get away. I credit the similar reports made by Para [REDACTED] and OT [REDACTED]. I further credit the report made by [REDACTED], that [REDACTED] observed similar behavior of Ms. Ragonese making the student sit in a chair for an extended period. This behavior continued into the 2024-2025 school year, when Ms. Ragonese again picked up this student under the armpits and moved [REDACTED] across the room to another workstation, as observed by [REDACTED].

iv. [REDACTED]

I find that Ms. Ragonese used physical force to grab Student [REDACTED] from underneath a table and pull [REDACTED] off the floor into the air. This student was hiding under a table and refused to come out. Ms. Ragonese took her hand, placed it around the student’s ankle, and pulled hard on the student’s ankle while raising her hand above her own head. Ms. Ragonese pulled the student completely off the ground so that [REDACTED] was hanging upside down. This finding is based on similar observations made by Paras [REDACTED].

Ms. Ragonese also used force with this student to push [REDACTED] into a chair and onto the ground. OT [REDACTED] also observed Ms. Ragonese push this student onto the ground, forcing [REDACTED] to sit down. Para [REDACTED] observed Ms. Ragonese grab the student, push [REDACTED] into a chair, then slam the chair into a table. I credit these observations as they provide similar accounts of Ms. Ragonese’s manner of treating this student.

Although [REDACTED] stated that [REDACTED] did not observe any inappropriate physical interactions with this student, I find that the statements of the three incidents outlined above were sufficiently particular in detail to warrant a finding by a preponderance of the evidence that Ms. Ragonese engaged in physical behaviors with this student.

v. [REDACTED]

I find that Ms. Ragonese physically touched this student by tickling [REDACTED] body, both while the student was in a chair and while Ms. Ragonese was holding the student. Both instances were observed by Para [REDACTED]. Ms. Ragonese reportedly stated that she uses tickling to show the students can move, so that she does not cause the student to be restrained.

vi. [REDACTED]

This student [REDACTED] This student was having a difficult time with controlling [REDACTED] behavior within the In-step classroom, as observed by [REDACTED]

I find that Ms. Ragonese saw this student bang [REDACTED] head on the window, and that in response, she took the student by the arm and yanked hard to make the student stop. The student continued to yell and scream in response, as observed by [REDACTED].

I find that Ms. Ragonese was in the OT room with this student and [REDACTED]. The student attempted to come towards Ms. Ragonese, and in response, Ms. Ragonese grabbed the student around both shoulders and pushed the student to the mat three times in a row. [REDACTED] overheard Ms. Ragonese later say she was “redirecting” the student. I credit the statement of [REDACTED] who observed Ms. Ragonese repeatedly pushing the student to the floor.

I find that Ms. Ragonese grabbed this student by the arm and quickly pulled the student behind her back twice, as observed by [REDACTED]. [REDACTED] observation that [REDACTED] witnessed Ms. Ragonese forcefully remove this student from the classroom corroborates the observations of [REDACTED] who provided a similar account of Ms. Ragonese’s treatment of this student.

On or about October 18, 2024, Ms. Ragonese was with this student in the In-step classroom. Ms. Ragonese placed the student behind a movable wall. Ms. Ragonese antagonized the student to approach the wall. I find that as the student reached the wall, Ms. Ragonese forcefully pushed against the wall, causing the student to fall backwards onto the floor, as observed by Paras [REDACTED].

B. Staff Reporting

Many of the staff members described poor working conditions in the In-step classroom; some witnesses focused intently on the way they were mistreated by Ms. Ragonese. According to several reports, Ms. Ragonese only worked closely with Paras [REDACTED], and repeatedly made unprofessional statements to other employees. [REDACTED] reported feeling bullied by Ms. Ragonese.

Ms. Ragonese changed her demeanor when administrators or BCBAs visited the classroom. Many Paras observed a stark change in the way Ms. Ragonese treated students when she was being observed. Assistant Principal Caffelle’s formal observations of Ms. Ragonese

confirm that Ms. Ragonese exhibited appropriate and professional demeanor when the administration was watching. See Exhibit 5 at 63.

Many employees feared retaliation from Ms. Ragonese if they reported her mistreatment of students or employees. Multiple Paras were aware that school counselor [REDACTED] reported that Ms. Ragonese pushed a student down the hallway in March of 2024. Several Paras observed Ms. Ragonese return to the classroom after meeting with the administrators about the allegations. The Paras observed Ms. Ragonese laugh about receiving a reprimand, and heard Ms. Ragonese call the administration's response "a slap on the wrist". Ms. Ragonese made disparaging comments about [REDACTED] after this report. The Paras that worked in the In-step classroom feared retaliation by Ms. Ragonese and the negative impact that reporting Ms. Ragonese would have on their ability to work with their students.

Even with the poor working conditions and fear of retaliation, several specific instances of Ms. Ragonese mistreating students were reported to administration, as outlined below.

i. November 2023

BCBA [REDACTED] reported concerns of Ms. Ragonese physically abusing students to Principal Childs, Assistant Principal Caffelle, and Director Kennett in November of 2023. This report was made based on observations of [REDACTED] in October 2023 and observations by [REDACTED] in November 2023. [REDACTED] had observed Ms. Ragonese being unnecessarily physical with Student [REDACTED], and [REDACTED] had observed Ms. Ragonese give Student [REDACTED] a "wedgie" and threaten further physical harm if the student did not comply with her commands. I credit [REDACTED] clarifying statement that [REDACTED] reported that Ms. Ragonese "was struggling to manage Student [REDACTED] behavior" and she was "losing patience during [REDACTED] tantrums and becoming too physically forceful with [REDACTED]." See Exhibit 25 at 455-456. The report, made directly to Principal Childs, included that Ms. Ragonese presented unclear demands to students, set unreasonable expectations, failed to deliver promised rewards, and *used excessive hands-on with students*. See Exhibit 2 at 5.

I credit Principal Childs' statement that she knew a student was triggered by Ms. Ragonese and that she referred the matter to Assistant Principal Caffelle and Director Kennett for review, and I further credit her statement that Principal Childs did not follow up with either Assistant Principal Caffelle, Director Kennett, or BCBA [REDACTED] for more information regarding the outcomes or ongoing plan for this student. Although the student was in a special education setting, as the building administrator, Principal Childs' lack of knowledge of the outcome of this report is the result of her own failure to request an update from her Assistant Principal. Assistant Principal Caffelle's knowledge of this report was limited to the information provide by Principal Childs, and I do not find evidence to support that Assistant Principal Caffelle was aware of any report of the use of "excessive hands on".

Based on his position as the Director of Student Services, Director Kennett knew or should have known about the [REDACTED] [REDACTED]

██████████ required his approval. Director Kennett, however, was not included in the meeting in which ██████████ directly expressed her concerns about “excessive hands on”. The evidence supports a finding that Director Kennett was not knowledgeable about the allegation of Ms. Ragonese using “excessive hands on”, as corroborated by the fact that he kept Ms. Ragonese in place as the student’s case manager after the student ██████████.

ii. February 2024

Principal Childs and Director Kennett were aware that Behavior Consultant ██████████ had additional complaints about Ms. Ragonese in February 2024. Behavior Consultant ██████████ first reported Ms. Ragonese’s physical abuse of Student ██████████ BCBA ██████████. ██████████ observed Ms. Ragonese harming Student ██████████ by pushing against the student’s chair and forcing the student’s body up against a table in the hallway. Ms. Ragonese also pushed this student away from her with force after taking the student to Room 8. ██████████. ██████████ explained the incident and her observations to ██████████ over the phone and that ██████████ also wrote detailed notes in a document created by ██████████ for reference.⁴⁴ ██████████ had previously directed ██████████ to document her observations, and ██████████ acknowledges that ██████████ shared concerns about Ms. Ragonese’s treatment of students in February of 2024. I therefore find sufficient evidence to establish that ██████████ timely reported her observations to ██████████.

██████████ reported this incident to Director Kennett. Although ██████████ states that she reported the incident to Director Kennett, he denies receiving the report in February. ██████████ indicated that Director Kennett’s response to this report was that “[██████████] will just have to deal with it.” When asked if he received reports about Ms. Ragonese from ██████████, Director Kennett stated he did not remember when he spoke with ██████████ about her concerns. When asked about the District’s response to reports of physical abuse, Director Kennett made several comments that when employees reported “actionable” items he would direct them to “take action.” Director Kennett’s attitude during his interview was dismissive of ██████████ which corroborates her concern that Director Kennett continually “minimized” her concerns. Director Kennett I therefore credit ██████████ statement that Director Kennett wanted ██████████ to handle the response.

Principal Childs acknowledged that she was also aware of ██████████ concerns in February of 2024, but she did not have any specific information about the specific details of this complaint. Assistant Principal Caffelle stated she became aware of this incident in June when ██████████ reported other concerns.

⁴⁴ The shared document was provided to me by both ██████████ and ██████████. See Exhibit 2; Exhibit 7; Exhibit 19.

iii. March 2024

Principal Childs, Assistant Principal Caffelle and Director Kennett all received the report that [REDACTED] observing Ms. Ragonese push a student down the hallway in March of 2024. Assistant Principal Caffelle investigated the complaint with assistance from then-HR director Rooney. Assistant Principal Caffelle did not complete the investigation as directed. Although Principal Childs and Director Kennett believe that Assistant Principal Caffelle did not substantiate the allegations, Assistant Principal Caffelle never completed her findings.

On Friday, March 8, 2024, HR Director Rooney directed Assistant Principal Caffelle to meet with Ms. Ragonese. See Exhibit 3 at 45. The purpose of this meeting was investigatory: Assistant Principal Caffelle was to give Ms. Ragonese an opportunity to respond to the allegations against her, and then Assistant Principal Caffelle was directed to determine if a disciplinary finding was warranted. Id. When Assistant Principal Caffelle met with Ms. Ragonese with Director Kennett, however, the meeting involved a discussion of the perceptions of Ms. Ragonese's behavior and appeared to be based on a finding that the alleged conduct was unsubstantiated during the investigation.⁴⁵ Assistant Principal Caffelle did not confront Ms. Ragonese with the allegations as she was requested to do. This finding is corroborated by the report from Behavior Consultant [REDACTED] that Assistant Principal Caffelle never contradicted Ms. Ragonese.⁴⁶ The email from HR Director Rooney with instructions for the meeting with Ms. Ragonese, including HR Director Rooney's statement that "it's time she realizes this is serious and she needs to follow the appropriate "hands-on" procedures" was not copied to Director Kennett or Principal Childs. See Exhibit 3 at 45. Assistant Principal Caffelle's refusal to engage in the investigation process as directed by HR Director Rooney may have contributed to the ongoing physical abuse of students at the Bakie School.

None of the administrators followed up after this investigation was concluded. Director Kennett did not take any further action regarding the investigation because it was handled by Assistant Principal Caffelle. Principal Childs did not follow up further for additional information. In the words of Principal Childs, "[Assistant Principal Caffelle] was responsible to handle [the investigation] and bring it back to [Principal Childs] if it needs attention." Principal Childs' understanding that Assistant Principal Caffelle "went to [Director Kennett]" but had "nothing to share." HR Director Killen was recently hired and was not involved in the investigation because HR Director Rooney assisted with the investigation. Superintendent Ambrose was not aware of the investigation or outcome.

I credit Principal Childs' statement that she brought the crisis team together to review protocols and strategies for responding to students following the report from school counselor [REDACTED]. The failure of any administrator to effectively complete an investigation into these

⁴⁵ See Director Kennett's interview, page 30, above.

⁴⁶ See [REDACTED] interview, page 34, above.

serious allegations of misconduct may have contributed to the ongoing abuse of students at the Bakie School.

iv. May 2024: Contracted Provider

Director Kennett and Assistant Principal Caffelle received a report that a disabled, non-verbal student was physically mistreated by an unidentified teacher in May of 2024. A contracted provider, [REDACTED], emailed Director Kennett and Assistant Principal Caffelle, informing him that [REDACTED] observed a teacher pulling a student in the hallway while the student resisted, and stating that BCBA [REDACTED] was present. See Exhibit 2 at 18. Specifically, this email stated she was unable to identify the teacher; however, mentioned that the student was possibly “disabled and non-speaking, although I am not certain.” Id. This same provider reported via email that Ms. Ragonese withheld food from students. See Exhibit 2 at 16. Director Kennett’s response, on which BCBA [REDACTED] was copied, was to state that he trusted Assistant Principal Caffelle to investigate and respond to the allegations. Id. at 16-18. Director Kennet did not follow up on this investigation, nor did he report the allegations to HR Director Killen or Superintendent Ambrose. Principal Childs was aware that Assistant Principal Caffelle received a complaint; however, she did not follow up regarding the outcome of Assistant Principal Caffelle’s investigation.

Assistant Principal Caffelle did not investigate or respond to the allegations. She was copied on the email sent directly to Director Kennett. In her first interview, Assistant Principal Caffelle did not acknowledge receiving this report. In her second interview, when confronted with the specific email on which she was copied, Assistant Principal Caffelle stated that she did not know the identity of the accused teacher and was unable to find a corresponding video of the alleged event. I do not credit this report, given that [REDACTED] copied BCBA [REDACTED] on the email. See Exhibit 2 at 18. Assistant Principal Caffelle did not take any further steps to address the report, and did not give any updates to Principal Childs or Director Kennett. Neither Principal Childs nor Director Kennett asked Assistant Principal Caffelle about her progress in investigating, or her response to, this report.

The report also included a statement that the provider believed “these interactions generally arise due to staff being uninformed, rather than any ill intent on the part of the staff.” See Exhibit 2 at 18. Director Kennett, the administrator responsible for training staff on restraint and seclusion, did not appear, based on his email response, to provide further training regarding appropriate techniques based on this report. See Exhibit 2 at 16-18. Ultimately, the administration, collectively, did not take any action to respond to this report, which may have contributed to the ongoing abuse of students at the Bakie School.

v. May 2024: [REDACTED]

[REDACTED] informed Principal Childs and Assistant Principal Caffelle on May 20, 2024 that Ms. Ragonese was “sabotaging” the program in the In-step classroom. [REDACTED] met with Principal Childs and Assistant Principal Caffelle to discuss [REDACTED] ongoing concerns about Ms. Ragonese’s interactions with students. I do not find that specific instances of physical abuse

of students were discussed in this meeting, rather, [REDACTED] was reporting information that the In-step classroom Paras brought to [REDACTED] attention: that they believed Ms. Ragonese was intentionally not following student IEPs as required. As Principal Childs put it, [REDACTED] reported that Ms. Ragonese was, again, “triggering” her students and their behaviors. Following this conversation that included Principal Childs, Assistant Principal Caffelle, and [REDACTED] Principal Childs delegated any follow-up to Assistant Principal Caffelle. I was unable to find any evidence of a further investigation or inquiry into [REDACTED] concerns.

Although this report did not contain any statement of physical abuse, the general concern that Ms. Ragonese did not follow directives, combined with the several prior reports of Ms. Ragonese’s inappropriate interactions with students, shows that the administration, by May of 2024, had received many reports of Ms. Ragonese failing to meet the basic expectations for a teacher in the District. See Exhibit 21 at 435 (Board policy JICDA). The May 2024 report by [REDACTED] is also relevant because it provides an additional instance where Principal Childs and Director Kennett delegated responsibility to Assistant Principal Caffelle, where Assistant Principal Caffelle failed to adequately investigate concerns, and where both Principal Childs and Director Kennett failed to take responsibility to confirm whether any response occurred.

vi. June 2024: [REDACTED]

Assistant Principal Caffelle received a report from Behavior Consultant [REDACTED] that Ms. Ragonese was physically mistreating students on June 6, 2024. [REDACTED] asked to meet with Assistant Principal Caffelle after being told by BCBA [REDACTED] to report the concerns. See Exhibit 19 at 332. Specifically, [REDACTED] told Assistant Principal Caffelle about the February 20, 2024 incident during which Ms. Ragonese pushed Student [REDACTED] chair up against a table so hard that the student’s stomach hurt. [REDACTED] also reported observing Ms. Ragonese push Student [REDACTED] physically while in Room 8 as part of the same February incident. [REDACTED] also relayed the observations of a Para that Student [REDACTED] was forced to sit in one place for an extended time as punishment.

Assistant Principal Caffelle provided notes from her conversation with [REDACTED], in which she acknowledges receiving a report of physical abuse of students. These same notes include notes from Assistant Principal Caffelle’s conversation with Director Kennett.⁴⁷ These notes contain a statement against interest for Assistant Principal Caffelle, and the notes are

⁴⁷ I question the validity of the notes, given that Assistant Principal Caffelle did not provide them, reference them, or acknowledge that they existed during our first interview. It was only after I met with [REDACTED] and re-interviewed Assistant Principal Caffelle and specifically asked about the notes she took during her meeting with [REDACTED] that Assistant Principal Caffelle acknowledged their existence. When asked to produce them, Assistant Principal Caffelle waited three days before sending them via email. I further question their validity because [REDACTED] stated Assistant Principal Caffelle took handwritten notes, but what she produced was a typed copy. Finally, when asked about the notes, Assistant Principal Caffelle stated that she would have to search for them, but then during the same interview, picked up a piece of paper and purported to read from the notes.

consistent with the information provided by [REDACTED] about the contents of the Juen 6 report. Therefore, on balance, I credit that Assistant Principal Caffelle had knowledge of [REDACTED] observing Ms. Ragonese use inappropriate physical restraint with students, and I also credit that [REDACTED] relayed this information to Director Kennett. This finding is supported by Director Kennett's acknowledgement that he was aware that Principal Childs and Assistant Principal Caffelle were processing concerns about Ms. Ragonese at the end of the school year. Director Kennett's recommendation was, again, to provide the "response plans" for each student to the employees in the In-step classroom to ensure compliance, which is consistent with his statement during his first interview that the student's "response plans" were an important piece of responding to allegations made by [REDACTED] against Ms. Ragonese in the spring of 2024.

Principal Childs and Director Kennett, along with Assistant Principal Caffelle, received an email on June 7, 2024 from [REDACTED]. Addressed to Assistant Principal Caffelle, the email read, "Thank you for meeting with me regarding incidents that I have witnessed in Instep/Basics, with Case Manager Aimee Ragonese." See Exhibit 19 at 328. Despite receiving this email, when asked if she received any further complaints at the end of the school year, Principal Childs responded, "not that I can recall". Principal Childs, as the person responsible for the Bakie School, did not adequately follow up to the email on June 7, 2024 in which she became aware that [REDACTED] had observed incidents of misconduct by Ms. Ragonese. I credit that Director Kennett had knowledge of Assistant Principal Caffelle's conversation and that he told Assistant Principal Caffelle to "keep an eye on things" for the In-step classroom.

Assistant Principal Caffelle, Principal Childs and Director Kennett did not take any further action regarding these instances of physical mistreatment of students, which may have contributed to the ongoing abuse of students by Ms. Ragonese.

vii. June 2024: 3 Employees

Director Kennett and Principal Childs had knowledge that three employees were transferred out of the In-step classroom at the end of the 2023-2024 school year. These employees were Paras [REDACTED] and OT [REDACTED]. While I do not specifically find that any of these employees reported concerns about Ms. Ragonese harming children, I do place significance on the high number of employees refusing to return to work in that one classroom. During his second interview, Director Kennett reflected that, because of the difficult student behaviors exhibited in the In-step classroom, three people refusing to return to the program was not out of the ordinary. The Building Principal is responsible for managing assignments in their school and the Student Services Director is responsible to manage the special education program. The failure of these administrators to flag or notice the transfer of three employees out of one classroom contributed to the ongoing abuse of students at the start of the 2023-2024 school year.

viii. Summer 2024

Director Kennett received a report during the summer of 2024 that Ms. Ragonese had used pushed her fingers into student armpits to move the students around the classroom. [REDACTED] provided a very detailed explanation of her summertime conversation with Director Kennett: [REDACTED] and spoke to Director Kennett during [REDACTED]. Although Director Kennett denied receiving this report, when asked specifically about speaking to [REDACTED] while she was [REDACTED], Dr. Kennett's response was that he "did not recall" receiving a report like that, but he did not completely deny that the conversation took place. Given the level of specificity that I provided to Director Kennett during his first interview, his response that the conversation was "not standing out in his head" was not credible. The conversation was unique. The allegation was significant. Either he had that conversation, or he did not: but the fact that he could not definitively state whether the conversation took place was not credible. Director Kennett later denied spending time at the Bakie School at all during the summer of 2024, contradicting his earlier statement that he did not remember the conversation. He later told me that since the Extended School Year ("ESY") program was not held at the Bakie School, that he did not spend any time there. That statement further calls into question his initial response. If he did not spend time at the Bakie School during the summer of 2024, he should have denied having that conversation with [REDACTED] altogether.

Director Kennett's statement that he did not recall speaking to [REDACTED] was evasive, not credible, and self-serving. Although she did not initially report these observations, [REDACTED] expressed remorse to [REDACTED] in June 2024 about her failure to report. I therefore credit [REDACTED] report and find that [REDACTED] provided sufficiently detailed information about this conversation with Director Kennett that I find the conversation did occur.

Director Kennett did not take any further action in response to this report. Director Kennett did not investigate or notify anyone else of the report he received. He allowed Ms. Ragonese to continue in her role at the Bakie School and to continue to work with students. His knowledge and lack of response directly contributed to the abuse experienced by students during the 2024-2025 school year.

ix. September 2024

Assistant Director Davine received information about Ms. Ragonese from a few Paras at the start of the year. Assistant Director Davine stated these reports were focused on the way she treated the Paras in the classroom.⁴⁸ The September 6 report by Para [REDACTED] included allegations that Ms. Ragonese previously used her fingernails to dig into the students' armpits, and she used her own chair to prevent students sitting at tables from getting out of their seats.

⁴⁸ Assistant Director Davine met with Para [REDACTED] on August 28, 2024, and Para [REDACTED] on September 6, 2024. See Exhibit 2 at 25.

Assistant Director Davine met with Assistant Principal Caffelle and Principal Childs following this conversation.

Assistant Director Davine and Assistant Principal Caffelle also received a complaint from [REDACTED], as relayed by Principal Childs, that Ms. Ragonese inappropriately called Student [REDACTED] the “[REDACTED]” of [REDACTED] in the hallway. Assistant Principal Caffelle and Assistant Director Davine met Ms. Ragonese to discuss her inappropriate comments. Assistant Director Davine followed up this conversation with an email reminder that Ms. Ragonese was expected to “continue to be mindful of demonstrating a professional demeanor and obtaining appropriate boundaries.” Exhibit 4 at 53.

This meeting did not address physical mistreatment of students and was not disciplinary in nature. See Exhibit 4 at 53. I do not find any evidence that Assistant Principal Caffelle provided Assistant Director Davine with any background information about the prior allegations against Ms. Ragonese. Assistant Principal Caffelle’s failure to provide this information to Assistant Director Davine, as she assumed this critical role from Assistant Principal Caffelle, directly contributed to the ongoing abuse of students at the Bakie School.

V. POLICY ANALYSIS

The duty of all educators to report suspected child abuse or neglect is covered by Board policy JLF. Pursuant to this policy, all staff members at the Bakie School are required to report suspected abuse of students. Staff Members [REDACTED] appropriately reported their own observations, or relayed the reports from other staff members, and did not violate Board policies based on the information detailed in Section IV, B, above.

A. Staff Members Failure to Report

Several Paras in the In-step classroom observed behavior that should have been reported pursuant to this policy, at least to an administrator, if not directly to DCYF. See Exhibit 23 at 441 (stating “[e]ach school employee, designated volunteer or contracted service provider having reason to suspect that a child is being or has been abused or neglected must also immediately report his/her suspicions to the building Principal or other building supervisor”). Paras [REDACTED] all observed instances of Ms. Ragonese physically abusing students, as outlined in Section III, A, above, and did not report these observations to the administration.

i. Specific Observations Not Reported

Para [REDACTED] observed four separate instances of conduct by Ms. Ragonese that [REDACTED] did not report to any administrators. Specifically, [REDACTED] observed Ms. Ragonese: pick up Student [REDACTED] with her fingernails and leave bloody scratch marks; pick up Student [REDACTED] using hands under the student’s armpits to move the student across the room; leave Student [REDACTED] enclosed in the movable wall for long periods of time; and yank Student [REDACTED] arm hard to make [REDACTED] stop banging [REDACTED] head against the wall. The failure to report these observations

of student mistreatment is a violation of Board policy JLF which requires all staff to report suspected abuse of students. The failure to report the seclusion of Student [REDACTED] is a violation of Board policy JKAA which requires specific reports for instances of seclusion. Furthermore, while not a specific violation, [REDACTED] statement that Ms. Ragonese was generally rough with Student [REDACTED] is particularly concerning as it evidences ongoing observations of inappropriate behavior. It should be noted, however, that [REDACTED] expressed a strong belief that if [REDACTED] reported Ms. Ragonese [REDACTED] would be fired or removed from the In-step classroom.

Para [REDACTED] observed four separate instances of conduct by Ms. Ragonese that [REDACTED] did not report to any administrators. Specifically, [REDACTED] observed Ms. Ragonese: put her hands under Student [REDACTED] arms and move or drag [REDACTED] across the room; use the movable wall and leave Student [REDACTED] enclosed for a long period of time; pick up Student [REDACTED] and move [REDACTED] to a chair by [REDACTED] armpits, after which the student rubbed [REDACTED] armpits; and grab Student [REDACTED] by the arm and pull back twice on the student's arm. Para [REDACTED] did report her observation that Ms. Ragonese disciplined Student [REDACTED] by forcing [REDACTED] to sit in a chair for an extended period. Para [REDACTED] did report, albeit with a delay, her observation that Ms. Ragonese pulled and pushed Student [REDACTED] back from a movable wall so that the student fell to the floor. The failure to report the observations of student abuse by Ms. Ragonese in which she grabbed students by or under their arms is a violation of Board policy JLF which requires all staff to report suspected abuse of students. The failure to report the seclusion of Student [REDACTED] is a violation of Board policy JKAA which requires specific reports for instances of seclusion, although [REDACTED] states that Director Kennett indicated this action was acceptable. [REDACTED] failure should be considered in light of [REDACTED] expressed belief that if Ms. Ragonese "didn't like you, [you] wouldn't work in [the] In-step [classroom]."

Para [REDACTED] observed four separate instances of conduct by Ms. Ragonese that [REDACTED] did not report to any administrators. Specifically, [REDACTED] observed Ms. Ragonese: put her thumb in Student [REDACTED] armpit and move [REDACTED] across the classroom; grab Student [REDACTED] around the middle and move [REDACTED] across the room; reach under the table and pull Student [REDACTED] out so hard that the student was hanging upside down off the ground; and grab Student [REDACTED] around both shoulders and push [REDACTED] down to the mat three times in a row. The failure to report these observations of student mistreatment is a violation of Board policy JLF which requires all staff to report suspected abuse of students. This violation should be considered in context of [REDACTED] statement that [REDACTED] "would not want to be on [the] bad side of treatment from [Ms. Ragonese]."

Para [REDACTED] observed two separate instances of conduct by Ms. Ragonese that [REDACTED] did not report to any administrators. Specifically, [REDACTED] observed Ms. Ragonese: put her hands on Student [REDACTED] shoulders and push the student down into a chair, and put her thumb in Student [REDACTED] armpit to move the student across the classroom. The failure to report these observations of student mistreatment is a violation of Board policy JLF which requires all staff to report suspected abuse of students. Para [REDACTED] policy

violation should be considered in context with her statements that she was not comfortable coming forward with allegations against Ms. Ragonese until the Paras decided, as a group, that a report of Ms. Ragonese's behavior needed to be made.

Para [REDACTED] observed one instance of conduct by Ms. Ragonese that [REDACTED] did not report to any administrators. Specifically, [REDACTED] observed Ms. Ragonese take students and push them into a chair against a table so that the students were pinned to the table. Although [REDACTED] states that this information was not based on [REDACTED] own observation, the failure to report instances of student abuse is a violation of Board policy JLF which requires all staff to report suspected abuse of students. This violation should be considered in light of [REDACTED] [REDACTED] expressed remorse for not previously reporting. [REDACTED] expressed concerns that even when reports were made, the administration didn't appear to do anything in effectively respond.

Para [REDACTED] observed three separate instances of conduct by Ms. Ragonese that [REDACTED] did not report to any administrators. Specifically, [REDACTED] observed Ms. Ragonese: pick up Student [REDACTED] and ask [REDACTED] to check for scratch marks, although [REDACTED] denies that the scratch marks were related to physical mistreatment; reach under the table and pull Student [REDACTED] up above her head so that the student was hanging off the ground; and grab Student [REDACTED] by the arm and pull back twice on the student's arm. The failure to report these observations of student abuse is a violation of Board policy JLF which requires all staff to report suspected abuse of students. [REDACTED] did report, albeit with a delay, [REDACTED] observation that [REDACTED] saw Ms. Ragonese push Student [REDACTED] back from the movable wall, which led to this investigation. This policy violation should be considered in light of [REDACTED] statement that [REDACTED] was worried about how Ms. Ragonese would respond if a report was made, and [REDACTED] observations that Ms. Ragonese would typically say "I did nothing wrong" in response to reports made against her.

Para [REDACTED] observed two separate instances of conduct by Ms. Ragonese that [REDACTED] did not report to any administrators. [REDACTED] observed Ms. Ragonese grab a student and push them into a chair while slamming the chair against the table, and [REDACTED] observed Ms. Ragonese tickle Student [REDACTED] while commenting that tickling does not count as restraint. I credit [REDACTED] [REDACTED] observations of student abuse because [REDACTED] was regularly in the In-step classroom and [REDACTED] observations are consistent with those of other Paras in the same room.. The email documentation provided by [REDACTED] in support of [REDACTED] claim that [REDACTED] reported [REDACTED] observations does not corroborate that any report occurred. See Exhibit 16 at 303. In fact, the email documentation focuses on [REDACTED] [REDACTED] statements during [REDACTED] interview also centered mostly around [REDACTED] as well. However, the notes that Assistant Director Davine took during the September 6 meeting indicate that [REDACTED] reported physical abuse by Ms. Ragonese. While this report was made late, based on [REDACTED] credible assertion that [REDACTED] reported in September, I credit [REDACTED] assertion that [REDACTED] also reported physical abuse during the prior year, and therefore I do not find sufficient evidence to establish that [REDACTED] [REDACTED] violated Board policies.

Para [REDACTED] observed three separate instances of conduct by Ms. Ragonese that [REDACTED] did not report to any administrators. [REDACTED] observed Ms. Ragonese: grab Student [REDACTED] by the neck and dig her fingernails into the student's back so that the student had scratch marks and was bleeding; push her thumb in to the student's armpit to move them off the floor while the student said "don't hurt me"; and use a movable wall and leave Student [REDACTED] alone for long periods of time. The failure to report the observations of student abuse is a violation of Board policy JLF which requires all staff to report suspected abuse of students. The failure to report the seclusion of Student [REDACTED] is a violation of Board policy JKAA which requires specific reports for instances of seclusion. This violation should be considered in light of [REDACTED] willingness to acknowledge [REDACTED] failure to report, and [REDACTED] statement of remorse that [REDACTED] did not say anything sooner.

Para [REDACTED] observed student mistreatment when Ms. Ragonese moved students across the classroom by pushing her fingers into their armpits. Para [REDACTED] and did not immediately report her observations, expressed regret for not reporting to [REDACTED], and then reported her observations to Director Kennett in the summer of 2024. [REDACTED] initial failure to report is a violation of Board policy JLF which requires all staff to report suspected abuse of students; however, [REDACTED] ultimately reported [REDACTED] concerns to Director Kennett. [REDACTED] expression of remorse for not immediately reporting should be considered when addressing this policy violation.

OT [REDACTED] observed two separate instances of conduct by Ms. Ragonese. [REDACTED] observed Ms. Ragonese: hold Student [REDACTED] chair in place while [REDACTED] tried to get away; and push Student [REDACTED] onto the ground while forcing the student to sit down. I am unable to make a finding as to whether [REDACTED] reported her observations. When I met with [REDACTED] [REDACTED]

[REDACTED] was not regularly assigned to the In-step classroom; given [REDACTED] role providing OT services to students [REDACTED] worked with both In-step students and other students throughout the building. I do not find that [REDACTED] had the opportunity to regularly observe Ms. Ragonese, which is distinct from many of the other Para witnesses in this investigation. Unfortunately, due to [REDACTED] lack of specific detail, incomplete memory, or unwillingness to provide complete details, [REDACTED] statement that [REDACTED] reported [REDACTED] observations was not convincing, and [REDACTED] focused largely on [REDACTED] The person [REDACTED] allegedly reported to was Assistant Principal Caffelle, who I have also found is not credible. I cannot find by a preponderance of the evidence that [REDACTED] failed to report [REDACTED] observations. [REDACTED] did not violate Board policies JLF or JKAA.

ii. Mitigating Circumstances

Although I make several findings that the above employees violated Board policy by failing to report suspected abuse of students, I also find that these same employees were put in a very difficult situation created by the actions of Ms. Ragonese and the failure of the building administrators to appropriately respond. The evidence shows that the Paras felt unable to come

forward individually and required each other's support to finally make a report of abuse against Ms. Ragonese.

As a group, the Paras were unhappy with their working conditions. Although a few significant reports about Ms. Ragonese being rough with students were made during the 2023-2024 school year, as outlined in Section III, B, above, the findings above show that the Paras, collectively, had a legitimate concern that allegations brought forward would not result in any action from administrators and would have a direct negative impact on their own working conditions. Para [REDACTED] articulated this concern to Assistant Director Davine on October 24, 2024, when [REDACTED] said [REDACTED] "[I]likes working in the room, [is] good at [REDACTED] job, doesn't want to have any issues or be kicked out. [REDACTED] loves the kids that [REDACTED] works with. If someone were to get hurt [REDACTED] would never forgive [REDACTED]" See Exhibit 4 at 60. Para [REDACTED] expressed that, "If [Ms. Ragonese] finds out it was them, she will make the room difficult and [REDACTED] can't work in that room anymore." See Exhibit 4 at 61. As explained by [REDACTED] on Friday, October 18, the Paras collectively decided that they had to intervene and report Ms. Ragonese to keep the students in the In-step classroom safe. Only after the Paras met collaboratively did they finally bring forward allegations that Ms. Ragonese physically abused children.

Furthermore, the working conditions in that room were untenable. Several employees refused to return to working in the room for the 2024-2025 school year including [REDACTED] [REDACTED] Overall, I credit the reports of the employees, largely Para-educators, who gave consistent accounts of the fingernail technique, restraint of students in a chair, the use of movable walls for seclusion, and her verbal demeanor that was grating and difficult for students to handle. Several Paras made statements against their own interest, admitting that they had seen students injured without making a report or admitting that they left a student in what they perceived to be an unsafe situation. (See Section II, above for the statements of [REDACTED]) These accounts were consistent between when the Paras were interviewed by HR Director Killen and their subsequent interview for this investigation.

Another mitigating factor was the lack of CPI training provided by the District. The District's model was to use a "crisis-response team" for instances in which restraint and/or seclusion were utilized. The people on this team were CPI trained. For the In-step classroom, Ms. Ragonese was the only CPI-trained professional. The Paras and other professionals in that classroom, therefore, felt they had to defer to Ms. Ragonese's knowledge of appropriate CPI techniques. This lack of knowledge of appropriate restraint techniques led to confusion in each individual Para regarding whether certain practices were appropriate. Combined with their fear of retaliation (based on how [REDACTED] was treated in March of 2024), this lack of knowledge directly contributed to their uncertainty and unwillingness to report allegations of suspected physical abuse.

Finally, each individual employee in this group that was willing to report their observations also expressed significant remorse about their prior failure to report. Even while

citing their own lack of knowledge and fear of retaliation, each person willing to report an observation of abuse also expressed regret that they did not come forward sooner. A few individuals told me they never saw abuse, and in the face of the overwhelming evidence outlined above, I find those reports difficult to believe. For those that did tell the truth about their observations, and did express remorse, they may also have additional mitigating circumstances beyond the scope of this report that may warrant further consideration.⁴⁹

B. BCBA [REDACTED]

[REDACTED] brought forward the allegations in October that ultimately led to Ms. Ragonese's removal from the In-step classroom. Prior to October 2024, [REDACTED] brought forward programmatic concerns about the In-step classroom, professionalism concerns about Ms. Ragonese, and concerns regarding Ms. Ragonese's unwillingness to implement student IEPs. [REDACTED] received a report of suspected physical abuse by Ms. Ragonese, or observed it [REDACTED] in October 2023, November 2023, February 2024, March 2024, May 2024, and twice in June 2024.

I find that [REDACTED] only failure to report either known or suspected physical mistreatment of students was in November of 2023. In October of 2023, [REDACTED] received a report from [REDACTED] [REDACTED] attempted to handle the report [REDACTED] by observing Ms. Ragonese in her classroom. In November of 2023, after observing Ms. Ragonese mistreating Student [REDACTED] by giving [REDACTED] a "wedgie" and threatening further physical harm, [REDACTED] focused on improving the situation for Student [REDACTED] and recommended [REDACTED] [REDACTED] reported directly to Principal Childs that Ms. Ragonese presented unclear demands to students, set unreasonable expectations, failed to deliver promised rewards, and used excessive hands-on with students. See Exhibit 2 at 5. [REDACTED] reported that Ms. Ragonese was "losing patience" and "becoming too physically forceful" with this student. [REDACTED] categorization of Ms. Ragonese "losing her patience" with Student [REDACTED] however, was misplaced. [REDACTED] witnessed Ms. Ragonese harm a student, but did not report [REDACTED] specific observations, that Ms. Ragonese pulled Student [REDACTED] pants up so high that [REDACTED] got a wedgie all while threatening to actually cause future harm if this student did not behave to administrators. Rather, BCBA [REDACTED] [REDACTED] focused on [REDACTED] [REDACTED] See Exhibit 7 at 183.⁵⁰ There is no doubt that [REDACTED] advocacy for Student [REDACTED] was incredibly effective in creating a significantly improved learning environment for this Student, as reported by Paras [REDACTED] [REDACTED] who observed tremendous improvement with this student due to [REDACTED] advocacy and improved behavioral plan for this student. Although [REDACTED] did not report [REDACTED] specific observations, Principal Childs also failed to ask questions about the meaning of "excessive hands on" And failed to investigate the allegations that Ms. Ragonese was becoming

⁴⁹ I did not ask each Para to explain why they were fearful of losing their employment or why they were otherwise unwilling to report the allegations at the time, but I believe many of these employees may have additional, personal information regarding their failure to report that might ultimately be relevant for future proceedings.

⁵⁰ [REDACTED] notes confirm that Basics classroom is a "more nurturing environment" including notation that Ms. Ragonese is "having hands on the student by moving [REDACTED] body physically."

“too physically forceful” with this student. A full investigation into that allegation at the time may have revealed BCBA [REDACTED] specific observations almost a year before this investigation began. Given BCBA [REDACTED] affinity for detail-oriented reporting, I credit that an investigation *would have* resulted in a full understanding of the allegations of Ms. Ragonese’s behavior at the time, and it was not [REDACTED] responsibility to launch this needed investigation. Nevertheless, I find that while [REDACTED] was using [REDACTED] judgment to support this student, Board policy JLF requires reporting specific allegations of abuse of students, and in just this one instance, [REDACTED] violated Board policy by failing to report [REDACTED] specific observations.

Board policy JKAA requires all employees to report instances of suspected abuse and neglect, stating “[a]ny doubt regarding whether to report should be resolved in favor of reporting.” See Exhibit 22. [REDACTED] agreed that [REDACTED] was familiar with the District’s reporting requirements, and ultimately, [REDACTED] actions of reporting to DCYF in October 2024 show [REDACTED] was knowledgeable of the reporting requirements. [REDACTED] failure to report the facts of [REDACTED] observations in October of 2023 and [REDACTED] own observation of the same in November of 2023 constitutes a violation of Board policy JLF.

[REDACTED] did not violate any other Board policies when receiving and responding to reports of student abuse, restraint, or seclusion. [REDACTED] reported the February 2024 incident, as observed by [REDACTED] to Director Kennett. Principal Childs was also aware that [REDACTED] had concerns about Ms. Ragonese’s treatment of students in February of 2024, and did not inquire about any further information. [REDACTED] consulted with school counselor [REDACTED] in March of 2024 when [REDACTED] reported observed physical misconduct and recommended to [REDACTED] that she report [REDACTED] observations. In May of 2024, [REDACTED] was included in an email chain initiated by BCBA [REDACTED], in which [REDACTED] reported observing an unidentified teacher harm a possibly disabled student in the hallway, citing that [REDACTED] was also present. Director Kennett and Assistant Principal Caffelle were included in this email communication. [REDACTED] was not asked to participate in any investigation regarding this complaint.

[REDACTED] brought forward concerns about the In-step classroom’s management in May 2024, but did not bring forward any additional concerns about student mistreatment. Although [REDACTED] May 2024 email to Principal Childs stated [REDACTED] wanted to address “a significant personnel concern in the building relative to the treatment of students”, [REDACTED] actual report to Principal Childs and Assistant Principal Caffelle on the following Monday was more about the In-step program and Ms. Ragonese’s failure to implement student IEPs and was not specifically about physical mistreatment of students. I credit the consistent reports from Principal Childs, Assistant Principal Caffelle, and [REDACTED] regarding the substance of this conversation.

[REDACTED] consulted with [REDACTED] in June of 2024 and encouraged [REDACTED] to report to Assistant Principal Caffelle, which [REDACTED] did the next day. [REDACTED] received a report from Para [REDACTED] in June of 2024 in which [REDACTED] alluded to an observation that required reporting, but [REDACTED] did not inquire further into [REDACTED]

observations. ██████ did not take any further action regarding the June 2024 comments by ██████.

██████ actions, over time, show that ██████ took an evolving approach to information about Ms. Ragonese's mistreatment of students. ██████ tried to respond to the concerns ██████ in the fall of 2023, ██████ successfully ██████ and ██████ reported abuse to Director Kennett in the winter of 2024. When nothing changed and Director Kennett did not take any action regarding the February 20 report, and when ██████ experienced retaliation in March, ██████ re-focused ██████ reporting on the programmatic needs of students in May of 2024. When the administrators did not respond to these program-specific concerns raised during the May 2024 meeting, ██████ then took no action in response to Para ██████ expressed regret in June 2024. Although ██████ was in a more highly specialized position than the Paras, the same mitigating circumstances, including fear of retaliation coupled with the administration's lack of any meaningful response, likely impacted on ██████ willingness to further investigate or report ██████ concerns in June 2024. ██████ advocacy for the students in the In-step classroom, and ██████ ability to build trust with students and staff, was the driving factor in the SAU office learning of these allegations in October that led to Ms. Ragonese leaving the District.

C. Response by Administration

The administration was aware that Ms. Ragonese was loud, difficult to work with, and that many people questioned her ability to work well with students, as outlined in the findings in Section IV, B, above. Several administrators, as outlined below, knew or should have known about Ms. Ragonese's abuse of students, and their failure to respond contributed to the continuing mistreatment of students in the In-step classroom. HR Director Kellen and Superintendent Ambrose were not knowledgeable of the ongoing situation at the Bakie School during the 2023-2024 school year, until this investigation commenced.

i. Lorin Caffelle

Assistant Principal Caffelle violated Board policy JLF by failing to investigate and report an allegation of physical abuse of students in March of 2024. ██████ reported to Assistant Principal Caffelle that Ms. Ragonese physically pushed Student ██████ down the hallway. Assistant Principal Caffelle's assertion that she does not remember investigating the specific allegation of a student being pushed down the hallway is not credible. My findings above are that this event did occur, based on the credible report of school counselor ██████ and Assistant Principal Caffelle's lack of credibility in denying any recollection of this specific complaint. Assistant Principal Caffelle failed to complete the investigation, as assigned by HR Director Rooney, by refusing to confront Ms. Ragonese with the allegations and deciding to treat the allegations as unfounded. Board policy JLF places specific responsibilities on the building Principal to report suspected abuse: at the time of the March 2024 complaint, with Principal Childs out of the office, Assistant Principal Caffelle assumed that responsibility but did not make

the required report. By refusing to complete the investigation or report the incident to DCYF, Assistant Principal Caffelle violated Board policy JLF.

Assistant Principal Caffelle violated Board policy JKAA by failing to investigate an incident of restraint in May of 2024, as reported by BCBA [REDACTED]. Director Kennett assigned the investigation of this report to Assistant Principal Caffelle, but her assertion that she was unable to identify the accused teacher is not credible. BCBA [REDACTED] stated in her report that BCBA [REDACTED] also witnessed the interaction and copied [REDACTED] on the email thread. Assistant Principal Caffelle did not investigate this complaint as directed, and as such, violated Board policy JKAA requiring that any incidents of restraint be reported.

Assistant Principal Caffelle violated Board policy JLF and Board policy JKAA by failing to report multiple instances of physical abuse and restraint of students in June of 2024. Assistant Principal Caffelle received a report from Behavior Consultant [REDACTED] that Ms. Ragonese punished Student [REDACTED] by making them sit for an extended period. [REDACTED] also reported the February 20, 2024 incident when Ms. Ragonese improperly restrained and abused Student [REDACTED]. I find that Assistant Principal Caffelle's reply, based on Director Kennett's recommendation, was to provide the "response plans" for each student to the In-step team. I do not find that she took any further action regarding these instances of physical mistreatment of students and thereby violated Board policy JLF for failing to report suspected instances of abuse of students and Board policy JKAA for failing to report an incident of restraint. I do not find that Assistant Principal Caffelle violated Board policies JLF or JKAA when she received a report from Assistant Director Davine in September 2024 that Ms. Ragonese was physically harming and restraining students, as relayed by Para [REDACTED]. Assistant Principal Caffelle was in the room with Principal Childs and received the same report from Assistant Director Davine. Principal Childs was responsible for responding to this report and/or designating Assistant Principal Caffelle to respond. Without information to support such designation, I do not find a further Board policy violation.

After being given an opportunity to reflect on her prior decisions, Assistant Principal Caffelle still said she did not see any "red flags" about Ms. Ragonese working with students after receiving the June 2024 reports. Assistant Principal Caffelle's inability to recognize, even in hindsight, that a report of Ms. Ragonese physically manipulating and harming students from [REDACTED] was serious and should be reported immediately to the Principal is concerning. Although Assistant Principal Caffelle notified Director Kennett about her conversation with [REDACTED], I find that she did not notify her primary supervisor, Principal Childs, about a serious safety concern in the building.

Assistant Principal Caffelle did not directly witness Ms. Ragonese mistreating students. Assistant Principal Caffelle did, however, fail to investigate and report several reports of mistreatment of students. Assistant Principal Caffelle received information directly from staff members about unsafe interactions between Ms. Ragonese and her special education students; as the administrator with direct oversight for the special education program, she did not do anything

to stop Ms. Ragonese's unsafe behavior with students. I am mindful that Assistant Principal Caffelle was not ultimately responsible for the building or for the program: those responsibilities fell to Principal Childs and Director Kennett, respectively. Although Assistant Principal Caffelle failed to make reports, but her direct supervisors repeatedly failed to supervise or otherwise provide any guidance for multiple investigations into several allegations of misconduct by Ms. Ragonese.

ii. Dr. Elizabeth Childs

Principal Childs did not meet the appropriate standard of care for a Principal under Board policy JLF. See Exhibit 23 at 440. Board policy JLF places several significant responsibilities on the Principal.⁵¹ Although Principal Childs did not personally observe instances of physical abuse of students, she was aware of such reports, delegated the investigation into the reports, and repeatedly abdicated any further responsibility for ensuring student safety, despite her specific reporting duties as outlined in Board policy JLF.

Principal Childs violated Board policy JLF when she received a report of Ms. Ragonese using "excessive hands on" with students in November of 2023 and failed to follow up or investigate the report. Principal Childs violated Board policy JLF when she became aware of a report of suspected student abuse from school counselor [REDACTED] in March of 2024 and did not take any steps to ensure that an investigation was completed and an appropriate response documented or reported to DCYF. I credit Principal Childs' statement that she was not at the building the day the report was initially made, and I credit that she brought the crisis team together to review protocols and strategies for responding to students after becoming aware of the allegations in March of 2024. As the Principal of the building, I am concerned about her lack of knowledge and concern for each investigation's outcome, even when HR Director Rooney was otherwise advising Assistant Principal Caffelle.

Principal Childs violated Board policy JLF when she failed to sufficiently investigate and report the allegations made by Behavior Consultant [REDACTED] to Assistant Principal Caffelle in June of 2024. Principal Childs was notified by email that [REDACTED] reported incidents involving Ms. Ragonese to Assistant Principal Caffelle. With her additional knowledge that Ms. Ragonese had previously been accused, more than once, of engaging in excessive hands-on with students, I find that Principal Childs violated Board policy JLF in June 2024 by failing to investigate and report suspected abuse of students.

I do not find sufficient evidence that Principal Childs violated Board policy JLF regarding the allegations made by [REDACTED] in February of 2024. Principal Childs had

⁵¹ These requirements include that: "[o]nce the Principal/ building supervisor receives the information [of suspected abuse or neglect], the law would impose a reporting requirement upon both the original reporter and the Principal" and "the Principal/ building supervisor shall immediately assure that DCYF/ law enforcement is or has been notified, and then notify the Superintendent that such a report to DCYF has been made" and "[a] written report shall be made by the Principal to the Superintendent within twenty-four (24) hours, with a copy provided to DCYF if requested". See Exhibit 23 at 440-441.

information that [REDACTED] had an additional complaint, and she failed to follow up regarding the nature of the complaint, but I cannot substantiate, by a preponderance of the evidence, that Principal Childs was aware of any specific abuse or restraint occurring, or even that the complaint was related to Ms. Ragonese physically mistreating students. I do not find any violation of Board policy JKAA for the February 2024 report.

I do not find sufficient evidence to substantiate that Principal Childs violated Board policy JLF or Board policy JKAA by failing to report an instance of physical abuse of students that came to her attention in September 2024. This report was made by Para [REDACTED] to Assistant Director Davine and then provided to Principal Childs. Although Principal Childs was somewhat vague in her denial, I also find that both her and Assistant Principal Caffelle denied receiving this information, and do not find sufficient evidence to corroborate the assertions of Assistant Director Davine.

Principal Childs failed to make herself reasonably available for her staff by assigning the investigation of reported student mistreatment to others without adequate follow-through, failing to give guidance to staff regarding reporting requirements, and failing to respond to requests from staff for meetings. Principal Childs repeatedly assigned Assistant Principal Caffelle to conduct investigations into reports regarding Ms. Ragonese but did not obtain information about, or express any concern for, each investigation's outcome.

I am mindful of the many responsibilities that fall on a Principal each day. But, as the administrator ultimately responsible for the building, Principal Childs' repeated failure to obtain information about Ms. Ragonese's treatment of students had a direct chilling effect on staff reporting. This chilling effect is evidenced by her dismissive attitude towards the two Paras that attempted to report anonymous allegations in October 2024 and the several days' delay before any other administrators learned that, in addition to concerns of Ms. Ragonese's treatment of other employees, that the Paras were seeking to report physical abuse of students. I do not find any further policy violation related to this delay, as Principal Childs did not have any knowledge of the allegations of physical abuse prior to October 24, 2024.

iii. Meredith Davine

Assistant Director Davine was not employed at the Bakie School during the 2023-2024 school year, and only met Ms. Ragonese this fall in August of 2024 upon starting her new role. I find that within a few weeks of starting her new role, she received complaints regarding Ms. Ragonese. The first complaint was from Para [REDACTED] on September 6th. Prior to meeting with [REDACTED] Assistant Director Davine met with Assistant Principal Caffelle and Principal Childs. Immediately after meeting with Para [REDACTED] Assistant Director Davine emailed both Principal Childs and Assistant Principal Caffelle to state that she wanted to discuss the concerning information she received. See Exhibit 26 at 502. Finally, Assistant Director Davine credibly states that when she met with the building administrators, she read out loud from her notes of the meeting with [REDACTED]. Assistant Principal Caffelle confirmed that Principal Childs told Assistant Director Davine to write "This is for my personal memory device" at the

top of the notes. See Exhibit 24 at 443. Although Principal Childs and Assistant Principal Caffelle deny that Assistant Director Davine gave them information about physical mistreatment of students, given the above, I cannot substantiate that Assistant Director Davine failed to report information brought forward by [REDACTED] on September 6th.

Assistant Director Davine also received information regarding inappropriate comments made by Ms. Ragonese on September 9th, and responded appropriately, as directed by Principal Childs and with the assistance of Assistant Principal Caffelle. Assistant Director Davine responded appropriately when she learned of the allegations regarding Student [REDACTED] in October 2024, assisting as directed with the early investigation and response; she provided interview notes with Paras [REDACTED]. See Exhibit 4 at 60-61. I find that Assistant Director Davine did not violate any Board policy regarding these complaints.

iv. Dr. Troy Kennett

Director Kennett violated Board policy JKAA and Board policy JLF when he failed to report the February 20, 2024 incident as relayed to him by BCBA [REDACTED] I credit [REDACTED] statement that [REDACTED] informed Director Kennett of the allegations made by [REDACTED] and that Director Kennett's response was dismissive and minimized the complaint. The February 20 incident involved Ms. Ragonese using a chair and table to restrain a student. The February 20 incident also involved Ms. Ragonese abusing the student by pushing the student away from her to the ground and using physical force when assisting the student on the toilet. When these allegations of abuse were reported to Director Kennett, he was obligated to further report the information to the Superintendent and DCYF in accordance with Board policy JLF. Director Kennett repeatedly blamed other administrators or employees for their role in failing to report Ms. Ragonese's conduct, and he refused to acknowledge his own responsibility for reporting allegations of restraint and seclusion given his role as the Student Services Director and designated CPI-trainer in the District.

Director Kennett violated Board policy JKAA when he failed to take appropriate steps to investigate and report the restraint brought forward by BCBA [REDACTED] Although [REDACTED] complaint did not identify the accused employee, Director Kennett did not talk to Assistant Principal Caffelle to ensure that she appropriately investigated the complaint. The allegation was serious, made in writing, and specifically identified that a teacher physically mistreated a student in the building. Director Kennett had a responsibility to ensure that the investigation was comprehensive and that the District engaged in an appropriate response. If any report was "actionable" it would be this one, but Director Kennett failed to take any appropriate action or further respond as required by the responsibility of his position.

Director Kennett violated Board policy JKAA when he failed to respond to Para [REDACTED] report regarding Ms. Ragonese. Director Kennett was told directly by [REDACTED] that Ms. Ragonese was manipulating students by pushing her fingers into their armpits and forcing them to move. As the CPI-trainer for the District, Director Kennett knew that such physical treatment was not an appropriate CPI-technique and that forcing a student to move was not

appropriate under Board policy JKAA. See Exhibit 22 at 437-438 (defining restraint as “bodily physical restriction . . . that immobilizes a person or restricts the freedom of movement of the torso, head, arms, or legs”). Director Kennett also knew that such force required a formal restraint report. See Exhibit 22 at 439. Director Kennett’s self-serving and vague denial of meeting ██████ over the summer was not credible. Director Kennett failed to further investigate, respond to, or report these concerns. While I am mindful of the enormous scope of the work charged to Director Kennett in his position, when it comes to student safety reports, this responsibility cannot be delegated.

I find that Director Kennett failed to properly implement Board policy JKAA regarding reporting restraint and seclusion. Director Kennett was responsible for ensuring that employees in special education classrooms were appropriately trained in restraint or seclusion. Director Kennett failed to appropriately train Paraprofessionals in the In-step program, relying instead on a “crisis response team” that included Ms. Ragonese and excluded any other individuals in the classroom. Director Kennett readily accepted that he designed this program. The flaw in this design became apparent when Paras failed to report inappropriate physical conduct because, in part, they were not trained in the proper procedures to use under CPI; and moreover, knew that Ms. Ragonese was the only individual in the room that was trained in such procedures. This model served to exacerbate the problem that the Paras were afraid to report their observations. Ms. Ragonese was supposed to have the requisite knowledge to engage with a child in a CPI hold; and without sufficient training, Paras were unable to identify whether Ms. Ragonese was using appropriate student techniques.

Director Kennett’s leadership further exacerbated this problem. His repeated statement that he expected employees to report “actionable” items lacked clarity. He did not train the Paras to identify what those “actionable” behaviors were, and so they were left without training or guidance to decide when to report Ms. Ragonese. Further, Director Kennett indicated that after school counselor ██████ March 2024 report, he made sure to provide the student’s “response plans” to the employees in the In-step classroom. The Paras then had knowledge that ██████ made a complaint, saw Ms. Ragonese retaliate against ██████, and then received student “response plans” for clarification regarding Ms. Ragonese’s behavior. Director Kennett’s failure to train the Paras on what constitutes restraint, seclusion, and intentional physical contact, along with his apparent failure to meaningfully respond to the school counselor’s complaint, directly contributed to the Paras unwillingness to report their observations of Ms. Ragonese’s physical mistreatment of students.

v. Kelley Killen

I find that HR Director Killen was aware of ██████ report that Ms. Ragonese pushed a student down the hallway in March 2024; however, I find that HR Director Killen was new to the role, and that HR Director Rooney handled the District’s response to that concern, and that HR Director Killen was not involved.

I find that HR Director Killen was not involved in the transfer of the three employees that did not wish to return to working with any students in the In-step classroom for the 2024-2025 school year. Considering that three separate employees had to be transferred out of the In-step classroom, and considering that the students in the In-step classroom are largely unable to communicate, I am concerned about HR Director Killen's lack of attention to this transfer of employees without further review. While I believe her failure to follow up regarding the employee transfers did contribute to Ms. Ragonese maintaining her position at the start of the 2024-2025 school year, I do not find that HR Director Killen violated any Board policy in this response.

HR Director Killen was not aware of any other allegations of physical mistreatment of students by Ms. Ragonese until October 2024. After being assigned to complete an initial review, HR Director conducted initial interviews and assisted with placing Ms. Ragonese on leave on October 28, 2024. I therefore do not find that HR Director Killen violated any policy in her handling of the initial complaint from October of 2024.

vi. Thomas Ambrose

I did not receive any information that Superintendent Ambrose knew of any report of physical misconduct by Ms. Ragonese prior to October 23, 2024. Although Superintendent Ambrose may have been aware of staffing changes at the end of the 2023-2024 school year in the In-Step classroom, he appropriately relied on his Human Resource Director, Director of Student Services, and the building Principal to manage any personnel changes as needed. I therefore find that Superintendent Ambrose did not violate any Board policy in his response to the allegations against Ms. Ragonese.

****END OF REPORT****