

EXHIBIT 20



SHAWNEE MISSION SCHOOL DISTRICT

Human Resources

TO: Caedran Sullivan, Teacher

FROM: Dr. Jeremy Higgins, Director of Secondary Human Resources

RE: Summary of Conference

DATE: March 31, 2023

The intent of this communication is to document and summarize our discussions that occurred March 31, 2023. These conversations were in reference to a Policy AC investigation that was completed between February 3, 2023 and March 8, 2023.

I was designated as the investigator for an Policy AC discrimination complaint that was filed by a SM North student and listed you as the Respondent. As part of my investigation, I interviewed you, the Complainant, a number of student witnesses, appropriate SMN staff, and reviewed relevant documents and records. After completing my investigation, I reached the following determination as outlined in the notice provided to you:

- With respect to each of the 4 allegations, a preponderance of the evidence did not show that Policy AC was violated by the Respondent, or that Respondent treated the Complainant differently or negatively because of or based on his gender identity or the fact that he is transgender.
- While the evidence did not show discrimination based on gender identity, a preponderance of the evidence shows that Respondent referred to the Complainant by his legal name and using incorrect pronouns on one or a couple occasions during the school year, and that the evidence indicated that this conduct was inadvertent and not purposeful.

It should be noted that, during your interview on March 3, you neither confirmed nor denied using the student's "deadname" or improper pronouns when referring to the Complainant. You repeatedly stated you "work very hard each and every day to use the name/pronouns that each and every student requests be used". Additionally, you stated that if you had used the wrong name or pronouns, it would have been incidental and accidental and not done with malice or intent to cause harm to the student. However, multiple student witnesses stated they heard you use the student's "deadname" and improper pronouns, not only with respect to the Complainant but also with respect to other transgender students.

The intent behind this usage and whether it was purposeful or discriminatory is not clear by a preponderance of the evidence. However, my investigation did show that use of "deadnames" and inappropriate pronouns did occur; my belief is that this was done incidentally and accidentally - not on purpose or with discriminatory motive. Ultimately, the strained relationship between yourself and the Complainant led to his belief that these mistakes were discriminatory in nature.

Additionally, multiple students reported to me that they felt you make little to no effort to get to know your students or use their preferred names/pronouns, even after correction. This perception undoubtedly had an impact on the student-teacher relationship with some students in your class.

Finally, while the preponderance of evidence gathered during the investigation did not show that you talked about the Complainant in a negative light to other students or to other classes, several student witness stated that you have talked negatively or shared what they deemed to



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be personal information about individual students and/or an entire class period which can impact student-teacher relationships.

While I understand that you had no ill intentions in your actions, there clearly was a breakdown in the student-teacher relationship. Reflecting back on this relationship should allow you to identify what could have been done differently to avoid this situation. You are a long-standing teacher in the District who has served a number of students over the years. As such, you know it is the expectation of the Shawnee Mission School District that our teachers act in a professional manner at all times and in conformance with district policy. In an effort to be as clear as possible with the expectations we discussed, I have noted key points below for your attention:

- Build the positive student-teacher relationships outlined in board policy GAF.
- Hold students to high expectations while also leaning on the relationship you have built with them and honoring who they are as a person.
- Strive to always use the preferred names/pronouns of students. If you do make a mistake, own that mistake and apologize.
- Don't speak about students or classes of students to others.

Caedran, I am hopeful our discussion today will provide an opportunity for you to reflect and adjust your actions for the future. I am confident the information I provided is sufficient for you to have a clear understanding of expectations moving forward and that you will use this information to remedy the concerns we have discussed. Finally, I will note that this letter is not a reprimand, but a summary of the events and our conversation. However, please understand that any future concerns regarding these expectations could result in disciplinary action. Again, I appreciate your time in meeting and having this discussion with me.

Respectfully,

Dr. Jeremy Higgins
Director of Secondary Human Resources

Supervisor's Signature

3/31/23

Date

Employee's Signature

3/31/23

Date

By signing this document, I acknowledge receipt of it, not necessarily agreement with the content. I have the right to submit a rebuttal within 10 days to also be placed in my personnel file.

CC: Official Personnel file



Notary