

**RESOLUTION FOR REMOVAL OF BOARD MEMBER RAYYA GHANI FROM
HER BOARD SEAT AND DECLARE HER BOARD SEAT VACANT DUE TO
HER CONVICTION OF CHARGES**

WHEREAS, Rayya Ghani (“Ghani”) is a Board Member of the Board of Education (“Board”) for Dolton School District 149 (“District”);

WHEREAS, after notice and an opportunity to be heard, the Board convicted Board Member Ghani of various charges of misconduct (“Charges”) that are outlined in the Bill of Particulars that are attached hereto and incorporated herein as Exhibit A.

WHEREAS, the Board finds Board Member Ghani’s conduct as described in Exhibit A constitutes sufficient cause to remove her from her Board seat and declare her Board seat vacant pursuant to the Illinois Election Code, 10 ILCS 5/25-2, the Illinois School Code, 105 ILCS 5/3-15.5, and 105 ILCS 5/10-11, and Board Policy 2:70.

NOW, THEREFORE, be it resolved by the Board of Education for Dolton School District 149, Cook County, Illinois, as follows:

Section 1. The preambles to this Resolution are true and correct and incorporated herein by this reference.

Section 2. The Board finds that sufficient cause exists for the removal of Board Member Ghani from her Board seat as set forth in the Bill of Particulars that are that are attached hereto and incorporated herein as Exhibit A.

Section 3. The Board finds that Board Member Ghani’s Board Seat shall be declared vacant and that all necessary steps may be taken to fill that vacancy.

Section 4. The President and Secretary of the Board of Education will sign and cause to be served upon Board Member Ghani, within five (5) days after adoption hereof, a copy of this Resolution, together with the Bill of Particulars, by email and first-class U.S.

mail and certified mail, return receipt requested. The President and Secretary of the Board of Education are authorized and directed to prepare or cause to be prepared, such other additional notices and documentation as may be necessary and/or required by law.

Section 5. This Resolution shall have full force and effect forthwith upon its adoption by a majority vote of all members.

Member _____ moved and Member _____ seconded the motion that said resolution as presented and read by title by the Secretary be adopted.

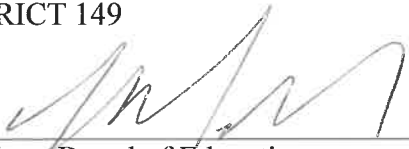
After a full discussion thereof, the President directed that the roll be called for a vote upon the motion to adopt said resolution as read by title.

Upon the roll being called, the following members voted:

AYES: 4
NAYS: 2
ABSTAIN: 0
ABSENT: 0

WHEREUPON, the President declared the motion carried and the resolution adopted and did sign and approve the same in open meeting and did direct the Secretary to record the same in full in the records of the Board of Education of Dolton School District 149, Cook County, Illinois, this 3rd day of November, 2022.

BOARD OF EDUCATION DOLTON SCHOOL DISTRICT 149

BY: 

President, Board of Education

ATTEST:

Secretary, Board of Education
STATE OF ILLINOIS)
)SS
COUNTY OF COOK)

CERTIFICATION

I, the undersigned, do hereby certify that I am the duly qualified and acting Secretary of the Board of Education of Dolton School District 149, Cook County, Illinois, and that as such official I am the keeper of the records and files of the Board.

I do further certify that the foregoing is a full, true and complete copy of a Resolution adopted by the Board of Education at a meeting of said Board held on the 3rd day of November 2022.

I do further certify that the vote on the adoption of said Resolution was conducted openly, that said meeting was called and held in strict compliance with the provisions of the Open Meetings Act and of the School Code of the State of Illinois, as amended, and that the Board has complied with all of the provisions of said Act and said Code and with all of the procedural rules of the Board in the conduct of said meeting.

IN WITNESS WHEREOF, I have hereunto affixed by official signature this 3rd day of November, 2022.



Secretary, Board of Education

EXHIBIT "A"

BILL OF PARTICULARS TO REMOVE BOARD MEMBER RAYYA GHANI FROM HER BOARD SEAT AND DECLARE HER BOARD SEAT VACANT DUE TO HER CONVICTION OF CHARGES

The Board of Education of Dolton School District 149, at its October 11, 2022 Board Meeting approved six (6) charges of negligence and misconduct against Board Member Rayya Ghani ("Charges"). After giving Board Member Ghani notice of these Charges and an Opportunity to be Heard at the November 3, 2022 Board Meeting, the Board hereby finds that the following Charges have been proven and constitute sufficient cause to remove Board Member Ghani from her Board Seat and Declare it Vacant pursuant to the Illinois Election Code, Section 10 ILCS 5/25-2 (Resignations and Vacancies, Events on Which an Elective Office Becomes Vacant), the Illinois School Code, Section 105 ILCS 5/3-15.5 (Removal of School Board Members), and Section 105 ILCS 5/10-11 (Vacancies), and Board Policy 2:70 (Vacancies on the School Board - Filing Vacancies). These actions are taken based upon the following reasons:

GENERAL ALLEGATIONS

1. The Board of Education for Dolton School District 149 ("Board"), Cook County, Illinois, is created pursuant to the Illinois School Code, 105 ILCS 5/1 *et. seq.*
2. The Board consist of seven (7) duly elected members pursuant to the Illinois Election Code, 10 ILCS 5/1-1 *et. seq.*, and the Illinois School Code, 105 ILCS 5/9-1 *et. seq.*
3. All Board members are charged with complying with the Constitution of the United States, the Constitution of the State of Illinois, and the laws of the State of Illinois. (*See* Illinois School Code 105 ILCS 5/10-16.5 (Oath of Office)).
4. Each Member of the Board, pursuant to the Illinois School Code, 105 ILCS 5/10-16.5, are sworn to abide by majority decisions of the Board, and no Board Member has the legal authority to act as an individual (*See also* Board Policy 2:10 School District Governance; Board Policy 2:80 Board Member Oath and Conduct).
5. Each Member of the Board are sworn to duties and responsibilities that include, among other things, the following:
 - a. Respect taxpayer interest by serving as a faithful protector of the school district's assets;

- b. Respect the free expression of opinions by my fellow Board Members and will participate in Board discussions in an open, honest and respectful manner, honoring differences of opinion or perspective;
- c. Abide by majority decisions of the Board, while retaining the right to seek changes in such decisions through ethical and constructive channels;
- d. Strive to work together with the district superintendent to lead the school district toward fulfilling the vision the board has created, fostering excellence for every student in the areas of academic skills, knowledge, citizenship and personal development;
- e. Represent all School District constituents honestly and equally and refuse to surrender my responsibilities to special interest or partisan political groups; and
- f. Strive to keep my Board focused on its primary work of clarifying the District purpose, direction and goals and monitoring District performance.

(Illinois School Code 105 ILCS 5/10-16.5 (Oath of Office); Board Policy 2:80 (Board Member Oath and Conduct); Board Policy Exhibit 2:80-E (Board Member Code of Conduct)).

6. The Board, pursuant to the Illinois School Code, 105 ILCS 5/10-20.5, is charged with the responsibility of adopting and enforcing all necessary rules for the management and government of the public schools within this District.

7. The Board adopted several key Board Policies including, but not limited to the following:

- a. Board Policy 2:10 School District Governance;
- b. Board Policy 2:20 Powers and Duties of the School Board;
- c. Board Policy 2:70 Vacancies on the School Board - Filling Vacancies;
- d. Board Policy 2:80 Board Member Oath and Conduct;
- e. Board Policy Exhibit 2:80-E Board Member Code of Conduct;
- f. Board Policy 2:110 Qualifications, Term, and Duties of Board Officers;
- g. Board Policy 2:220 School Board Meeting Procedure; and
- h. Board Policy 5:20 Workplace Harassment Prohibited.

8. Board Member Rayya Ghani was elected to the Board in 2006, and became Board President in May 2021, swearing under oath to abide by all the statutory and Board Policy provisions set forth above.

CHARGE NUMBER ONE

BOARD MEMBER RAYYA GHANI INAPPROPRIATELY DIRECTED THAT DISTRICT EMPLOYEE A.B. RECEIVE A SIX PERCENT (6%) PAY INCREASE DESPITE KNOWING THE BOARD HAD NOT APPROVED THAT RAISE.

1. During the 2021-2022 school year, District employee A.B. was the Assistant to then Superintendent Dr. Shelly Davis-Jones.

2. On January 3, 2022, A.B. submitted a resignation letter that identified her retirement date as at the close of the 2024-2025 school year. (Board Exhibit A-1; A.B. resignation letter). Additionally, this resignation letter requested that the Board approve the following two financial benefits to A.B.: (a) receive a six (6) percent raise in each of the final three years of A.B.'s employment with the District (2022-2023SY, 2023-2024SY, and 2024-2025SY); and (b) pay for A.B.'s health insurance coverage upon her retirement in 2025 until A.B. became Medicare eligible. (*Id.*).

3. On January 19, 2022, The Board met at its regularly scheduled meeting. One of the items on the agenda was to "accept the letter of intent to retire for [A. B.] at the end of the 2024-2025 school year." (Board Exhibit A-2; Order of Agenda, Item L.8).

4. On January 19, 2022, the Board voted to accept Ms. Brown's retirement with an effective date at the end of the 2024-2025 school year (Board Exhibit A-3; Minutes of Meeting). The Board did not approve any additional pay or benefits for A.B. (*Id.*).

5. On March 16, 2022, the Board met at its regularly scheduled meeting. One of the items on the Board Agenda was J.5. that stated, "Need a motion to approve the retirement agreement between the Board of Education and [A.B.]" (Board Exhibit A-4; Order of Agenda, Item J.5.).

6. On March 16, 2022, Board Agenda item J.5. was consolidated with other old business items and approved by the Board in a 4-0 vote. (Board Exhibit A-5; Minutes of Meeting).

7. However, no document was contained in the Board's March 16, 2022 materials that identified what "agreement" the Board approved for A.B. Additionally, no document has been uncovered anywhere as to the terms or conditions of the supposed "agreement" by the Board with A.B.

8. When interviewed as part of the Board's investigation, none of the Board members stated that the Board approved a six percent (6%) wage increase for A.B. nor agreed to provide A.B. with continuation of health insurance coverage after her retirement. In fact, six (6) Board members stated to investigators that: (a) A six percent (6%) wage increase for A.B. would have been exorbitant and not something the Board would have agreed to; and (b) similarly situated employees to A.B. only received a two percent (2%) or three percent (3%) raise that year.

9. Board consultant Dr. Jay Cunneen was present during the Board's open and closed meetings on March 16, 2022. When interviewed, Dr. Cunneen does not recall the Board approving a six percent (6%) raise or extended health insurance coverage for A.B. after retirement at the March 16, 2022 Board meeting.

10. When interviewed, Board Member Rayya Ghani also stated that the Board did not approve a six percent (6%) raise or extended health insurance coverage for A.B. after retirement at the March 16, 2022 Board meeting.

11. Despite no Board approval, when interviewed A.B. stated that she met in a private meeting with Board Member Ghani and former Superintendent Davis-Jones after the March 16, 2022 Board meeting. A.B. stated that during this private meeting Board Member Ghani and former Superintendent Davis-Jones stated that the Board approved her six percent (6%) raise for each of her final three years of her employment with the District, but it did not approve her request for health insurance coverage after retirement.

12. Despite no Board approval, Board Member Ghani sent a text to Dr. Cunneen on June 22, 2022, at 6:19 p.m., stating in relevant part, the following, "Hi, Jay, can you please straighten out this issue with the confidential employees? Make sure [A.B.] gets her check July 8th . . . Thank you!" (Board Exhibit A-6; 6/22/2022 text message). Dr. Cunneen's understanding of this text was that Board Member Ghani was asking him to make sure A. B. got her six percent (6%) wage increase at the same time other 12-month employees received their pay increases.

13. The next day on June 23, 2022, former Superintendent Davis-Jones emailed Board Member Ghani, and copied A. B. It read:

Good morning President Ghani,

[A. B.] expressed her concerns about not receiving her 6% for the first pay check in July. I have attached a spreadsheet with all retirees. [A.B.] is in the 2024-2025 tab. She is a 12 month employee.

I am not sure how you will proceed. Looking for guidance.

I will see you tonight at 6:30 pm at the primal cut.

Dr. Davis Jones''

(Board Exhibit A-7; Email dated 6/23/2022).

14. That same day on June 23, 2022, Dr. Cunneen emailed the District's Interim Business Manager Phillip Conboy stating, "The Board President [Rayya Ghani] informed me that [A.B.]'s salary should be increased by six percent for the 2022-2023 school year. This increase should take effect on the first paycheck July 8." (Board Exhibit A-8; Email dated 6/23/2022 from Dr. Cunneen to Phillip Conboy). Dr. Cunneen copied former Superintendent Davis-Jones, Board Member Ghani, Assistant Superintendent Twyla Harris, and incoming Superintendent Maureen White on this email (*Id.*). Notably, Board Member Ghani did not communicate any objections to this request.

15. Despite the Board never approving it, A.B. received a six percent (6%) raise from the District from July 8, 2022, to the present.

16. During her interview Board Member Ghani denied ever having a conversation with A.B., former Superintendent Davis-Jones or Dr. Cunneen about A.B.'s six percent (6%) raise. Moreover, Board Member Ghani confirmed that the Board did not pass A.B.'s six percent (6%) raise as it was an extremely high request.

17. By the actions taken by Board Member Ghani, as described in paragraphs one (1) through 16 of Charge Number One set forth above, she engaged in the following misconduct: (a) Violated her oath of office as a Board Member in violation of the Illinois School Code (105 ILCS 5/10-16.5), and Board Policies 2:80 and 2:80-E Exhibit; (b) Improperly disbursed public moneys subjecting the District to potential liability (735 ILCS 5/11-301 *et seq.*); and (c) Engaged in official misconduct by a public officer (720 ILCS 5/33-3).

CHARGE NUMBER TWO

BOARD MEMBER RAYYA GHANI SOUGHT OUT BOARD MEMBER ZACARIAS CASTILLO AT HIS HOUSE IN ORDER TO HARASS AND BULLY HIM REGARDING HIS VOTE AT THE FEBRUARY 19, 2022 BOARD MEETING, AND DISCRIMINATED AGAINST HIM AT A LATER BOARD MEETING

1. On February 16, 2022, the Board met for its regularly scheduled monthly meeting. Present at that meeting, either in person or virtually, were Board Member Rayya Ghani, Board Member Wilbur Tillman, Board Member Teresa Jemine, Board Member Zacarias Castillo, Board Member Loretta Crisler-Liggons, and Board Member Bertha Jolly. (Board Exhibit B-1).

2. During the meeting, Board Member Ghani requested a motion to consolidate items J, K, and P with the exception of items J 5 and K6. This motion was approved on a three yes, one abstention, and two no vote. Once consolidated, the Board Member Ghani requested a motion to approve the consolidated items. This motion failed on a three-to-three vote, with Board Member Tillman, Jemine, and Castillo voting no. (Board Exhibit B-1).

3. Board Member Ghani attended the meeting from the District Offices. Board Member Zacarias Castillo attended the meeting virtually from his home. It is undisputed among the witnesses with knowledge of this event that were interviewed as part of the Board's investigation that Board Member Ghani went to Board Member Zacarias Castillo's house after the Board meeting ended.

4. When interviewed, Mrs. Maria Castillo stated that she was in her home with her grandchild when Board Member Ghani came to the door. She described hearing banging on the door loud enough that it woke and scared the sleeping grandchild. Mrs. Castillo answered the door, and Board Member Ghani was angry and yelling for Board Member Castillo.

5. When interviewed, Board Member Castillo stated that he was pulling his car into the garage, and he could hear Board Member Ghani yelling from the garage. When he entered their home, he described Board Member Ghani as angry and yelling at his wife.

6. In their interviews, Board Member Castillo and Mrs. Castillo stated Board Member Ghani accused Board Member Castillo of causing trouble for her for not voting the way she wanted him to. Board Member Ghani yelled at him that he had the wrong people in his ear and stated that Board Member Castillo had Board Member Everett in his ear.

7. In their interviews, Board Member Castillo and Mrs. Castillo stated that Board Member Ghani made further comments threatening Board Member Castillo's employment at Thornton Township by stating that Frank Zuccarelli was no longer around to protect his job.

8. Mrs. Castillo described having to physically put herself between Board Member Ghani and Board Member Castillo because Board Member Ghani was approaching him in a physically aggressive manner.

9. When Board Member Ghani was interviewed, she admitted to going to Board Member Castillo's house after the meeting. However, she denied engaging in any unprofessional behavior.

10. A further allegation arose that Board Member Ghani made a discriminatory comment about Board Member Castillo at either the June or July 2022 Board Meeting.

11. During their interviews, Board Members Tillman, Jemine, Everett-Gray and Castillo all stated that Board Member Ghani directed comments to Board Member Castillo regarding his ability to speak English, stating he would be able to participate more if the conversation was in Spanish.

12. Board Members Tillman, Jemine, Everett-Gray and Castillo all described this interaction as discriminatory, intimidating, and insulting.

13. When asked about this incident during her interview, Board Member Ghani admitted that she might have said something in the heat of passion. She confirmed that it was common for Board Member Castillo to say little during the meetings, but she denied making any comments on his ability to speak English.

14. By the actions taken by Board Member Ghani, as described in paragraphs one (1) through 13 of Charge Number Two set forth above, she engaged in the following misconduct: (a) Violated her oath of office as a Board Member in violation of the Illinois School Code (105 ILCS 5/10-16.5), and Board Policies 2:80 and 2:80-E Exhibit; and (b) Engaged in official misconduct by a public officer (720 ILCS 5/33-3).

CHARGE NUMBER THREE

BOARD MEMBER RAYYA GHANI CONTINUED TO ACT AS BOARD PRESIDENT AFTER BEING REMOVED FROM OFFICE

1. On July 14, 2022, the Board voted by majority vote to remove Board Member Ghani from her position as President of the Board. Despite this vote, Board Member Ghani continued to act as though she still served in this office.

2. On July 20, 2022, the Board met for its regularly scheduled Board meeting. Despite the fact that newly elected Board President Wilbur Tillman was present to conduct the meeting, Board Member Ghani insisted on leading the meeting. The minutes from the July 20, 2022, Board Meeting reflects as follows:

Mr. Tillman addressed the Board Members, staff and community regarding the Special Board Meeting held on July 14th, 2022, pertaining to the removal of the current Board President. Mr. Tillman announced that he is now the acting Board President due to 4 votes to remove Ms. Rayya Ghani as the Board President, during the meeting on July 14th, 2022. Mr. Tillman told Ms. Ghani that she is no longer recognized as the Board President.

Ms. Ghani responded by stating that at the Special Board meeting on July 14, 2022, the Board was advised by legal counsel that the vote to remove Ms. Ghani from the seat as Board President is against School Board Policy. Therefore, Ms. Ghani is the Board President and will continue to sit as the Board President.

(Exhibit C-1).

3. Board Member Ghani represented herself as Board President to the new superintendent and District staff, requiring a letter to be sent to Superintendent White from Board Members Tillman, Jemine, Everett, and Castillo, requesting that she take whatever action was necessary to transfer power to the new Board President. (Exhibit C-2).

4. Further, Board Member Ghani continues to send emails referring to herself as the Board President. These emails were sent to District staff and legal counsel.

5. On July 19, 2022, Board Member Ghani sent an email to Kim Jannotta, Attorney with Del Galdo Law group, which stated: "Schools are created by and through public acts known as the school code. What authority under school code does it allow for me Rayya A. Ghani, Board President to be removed?" Additionally, her signature block includes "Board President."

6. On July 20, 2022, Board Member Ghani sent an email to Kim Jannotta, Attorney with Del Galdo Law group, which stated in part: "My name is Rayya A. Ghani, Board President of Dolton East School District 149." Additionally, her signature block includes "Board President."

7. On August 3, 2022, Board Member Ghani responded to an email from Superintendent White which included "Board President in her signature block. (Exhibit C-3).

8. On August 16, 2022, Board Member Ghani responded to an email from Board Member Tillman regarding the August 25, 2022, Board meeting. In her response, Ms. Ghani stated: "Below is an email from board Member Tillman, please know that I, Rayya A. Ghani, am the Board President and the meeting is set for Wednesday August 17th as WE set previously." (sic.) She also stated: "I am the Board President (whom you voted for) until my term expires." (Exhibit C-4).

9. On August 17, 2022, at 11:27 am, Board Member Ghani sent a text message to Board Member Tillman. The text message read:

Tillman,

Your oath requires you to abide by the laws of the State of Illinois. Your attempt to remove me as the Board of Education President and start a "witch hunt" and sham investigation are actions that are not in compliance with the School Code and wastes of tax payer money. Cease and desist your illegal behavior. I am the Board President (whom you voted for) until my term expires. This is reflected in the Illinois School Code. I advise that you review it. Your attempted vote to remove me has no basis in law. Also, it is ironic that you called for a vote to remove me from the office of the Presidency and then start an "investigation" on my conduct as the President of the Board of Education without giving any reasons as to why you are doing so or what the basis of it is.

(Exhibit C-5).

10. During our investigatory meeting with Board Member Ghani, she introduced herself as the current Board President, and continued to refer to herself as that position and challenge the Board's ability to remove her from the position.

11. Board Member Ghani was notified that she was no longer Board President.

12. On July 15, 2022, Attorney Kim Jannotta sent correspondence to Superintendent White explaining the vote taken by the Board and the legal support for it. A second letter was sent to Superintendent White on July 18, 2022, further explaining the legal support for the removal of the Board President.

13. Superintendent White shared these with Board Member Ghani. The letters were read by Board Member Ghani, as evidence by her July 19, 2022, email to Attorney Jannotta, which has the July 18th letter attached.

14. By the actions taken by Board Member Ghani, as described in paragraphs one (1) through 13 of Charge Number Three set forth above, she engaged in the following misconduct: (a) Violated her oath of office as a Board Member in violation of the Illinois School Code (105 ILCS 5/10-16.5); and (b) Engaged in official misconduct by a public officer (720 ILCS 5/33-3).

CHARGE NUMBER FOUR

BOARD MEMBER RAYYA GHANI IMPROPERLY YELLED, DEMEANED AND HARASSED FORMER BUSINESS MANAGER C.L.

1. C.L. was the former Business Manager for the District for several years.
2. The Board's investigation showed that Board Member Ghani had a contentious relationship with C.L.
3. The Board's investigation showed that Board Member Ghani yelled at C.L., cursed at C.L. and called him "Bruno" as a nickname. This verbal abuse, demeaning and harassing behavior occurred at and away from Board meetings.
4. At the April 20, 2022 Board meeting, a full-time police officer, who was also a part-time security officer for the District, addressed the Board informing Board members that he had attempted twice to meet with C.L. to obtain payroll documents for a loan application. However, C.L. did not meet with him on both occasions.
5. While the Board meeting was still underway, C.L. arrived and went to his office to print out the payroll records that the police officer had requested. C.L. gave the payroll records to the police officer that evening.
6. Based upon multiple interviews pursuant to the Board investigation, the evidence established that while C.L. was in his office obtaining the payroll records for the police officer, Board Member Ghani and former Superintendent Davis-Jones went to C.L.'s office. While in C.L.'s office, Board Member Ghani yelled at C.L. in a demeaning manner and raised her voice loud enough that some Board Members heard the yelling through the walls in the room where the Board meeting was held several feet away.
7. During her interview, Board Member Ghani admitted that she went to C.L.'s office on April 20, 2022. Board Member Ghani also admitted that she has a high-pitched voice and raised it during the exchange with C.L.
8. Shortly thereafter, on May 27, 2022, C.L. requested an audience before the Board asserting that he was subjected to a "very toxic and hostile working environment." Board Exhibit D-1; Letter from C.L. to Board Members).
9. On June 1, 2022, C.L. emailed his resignation to Board Member Ghani. It stated, "Effective immediately [his resignation]. This is absolutely the wrong way to treat a human being. I've served the school community well, and candidly you have bad information. I wish you all well." (Board Exhibit D-2; Email from C.L. to Board Member Ghani, 6/1/2022).

10. By the actions taken by Board Member Ghani, as described in paragraphs one (1) through nine (9) of Charge Number Four set forth above, she engaged in the following misconduct: (a) Violated her oath of office as a Board Member in violation of the Illinois School Code (105 ILCS 5/10-16.5), and Board Policy 2:80; (b) Engaged in official misconduct by a public officer (720 ILCS 5/33-3); and (c) Board Policy 5:20 that prohibits Workplace Harassment.

CHARGE NUMBER FIVE

BOARD MEMBER RAYYA GHANI FAILED TO TIMELY INCLUDE ITEMS ON THE BOARD AGENDA OR RELEGATED THEM TO NON-VOTING STATUS WHEN REQUESTED BY BOARD MEMBERS

1. On January 21, 2022, Board Member Wilbur Tillman emailed Board Member Ghani informing her that he had several items that he wanted added to the Board agenda for the Board to discuss and vote on at either their next regularly scheduled meeting or at a special meeting. These items included the following:

- a. Since a presentation had been made from Board Books a decision should be made by the Board as to whether to move ahead with this purchase.
- b. Committee assignments.
- c. Set a retreat meeting so that the Board could discuss a clear strategic plan, goals or direction for the District with the new superintendent coming in.
- d. Discuss with the Board and vote on removing job postings on the District's website since the new Superintendent should be the one hiring a Director of Early Childhood and the Principal of Diekman School as opposed to the outgoing Superintendent.

(Board Exhibit E-1; Email string between Board Member Tillman and Ghani, pp. 4-5).

2. Later that same day, Board Member Ghani responded saying that she had received his request, but that the items may have to be placed on the Board's "concerns" section of the agenda (Board Exhibit E-1, p. 3).

3. On February 16, 2022, Board Member Tillman, again, requested that Board Member Ghani place the above-referenced items on the Board agenda for a vote by all (Board Exhibit E-1, p. 1).

4. Board Member Ghani responded stating that she was willing to place them on the "comments and concerns" section of the Board agenda (Board Exhibit E-1, p. 1).

5. None of the items set forth above were placed on the agenda by Board Member Ghani except for the Board Books item, which was placed on the June 15, 2022, agenda (Board Exhibit E-2, Item K.5.).

6. On April 5, 2022, Board Member Tillman again emailed Board Member Ghani to place old unfinished business items on the Board's agenda. These items were the following:

- a. The Federal Government cut funding to make virus test free. What will we do for our students concerning testing?
- b. Board Book: So, we can lose most of the paper and go electronic: yea or nay.
- c. Committee Meetings: We established assignments last year when we had a meeting at the Middle School.
- d. The Board needs a retreat to talk about the Board.
- e. Vista National and the health insurance cost savings: yea or nay
- f. We never finished the concern in the finance department with Mr. Lewis and those teachers that was released yet stayed on payroll.

(Board Exhibit E-3; Email from Board Member Tillman to Board Member Ghani dated 4/5/2022).

7. Of these requests, only the Vista National Insurance Group item made the April 20, 2022, Board agenda (Board Exhibit E-4; Agenda for 4/20/2022 Board Meeting, Item J.2.), and the Board Books item made the June 15, 2022, agenda (Board Exhibit E-2, Item K.5.).

8. On June 10, 2022, Board Member Tillman emailed Board Member Ghani to place the following items on the June 15, 2022, Board meeting agenda:

- a. "Consideration and possible action regarding selection of the board of Education SD 149's Legal Counsel.
- b. Need a motion to adapt possible disciplinary action for employee(s) as discussed in closed session.
- c. Possible Action Concerning Matters from Executive Session if necessary."

(Board Exhibit E-5, String of email between Board Member Tillman and Board Member Ghani, pp. 6-7).

9. Seventeen (17) minutes later, Board Member Ghani emailed Mr. Tillman back denying his request stating that the agenda for the June 15, 2022 Board meeting had already been set, but that the items could be added to the July Board agenda (Board Exhibit E-5, pp. 5-6).

10. Later that same day, Board Member Tillman responded stating that it was well outside the 48-hour Open Meetings Act posting requirement. Therefore, his request should be granted in accordance with Board Policy 2:220 that allows for Board Members to add items to the agenda without limitation (Board Exhibit E-5, pp. 4-5).

11. On June 11, 2022, Board Member Ghani responded, again, denying Mr. Tillman's request (Board Exhibit E-5, p. 4).

12. After learning that she did not have the right to deny Board Member Tillman's request, Board Member Ghani backtracked in a June 13, 2022, email to Board Member Tillman (Board Exhibit E-5, pp. 2-3). While agreeing to place his items on the June 15, 2022 Agenda, Board Member Ghani relegated those items to the "Public Comments" section such that they were not subject to a vote by the Board. (Board Exhibit E-2, page 1).

13. By the actions taken by Board Member Ghani, as described in paragraphs one (1) through 12 of Charge Number Five set forth above, she engaged in the following misconduct: (a) Violated her oath of office as a Board Member in violation of the Illinois School Code (105 ILCS 5/10-16.5), and Board Policies 2:80, and 2:80-E Exhibit; (b) Engaged in official misconduct by a public officer (720 ILCS 5/33-3); and (c) Board Policy 2:220 setting forth School Board Meeting Procedures.

CHARGE NUMBER SIX

BOARD MEMBER RAYYA GHANI FAILED TO ACT IN AN APPROPRIATE MANNER AND DECORUM REFLECTING POORLY ON THE BOARD AND THE DISTRICT

1. Based upon interviews of Board members and others, the Board's investigation substantiated that Board Member Ghani has yelled, screamed and directed profanities at other Board members before, during and after Board meetings.

2. The Board's investigation substantiated that Board Member Ghani has called certain Board members "snakes" and "greedy" before, during and after Board meetings.

3. The Board's investigation substantiated that Board Member Ghani went to Board Member Zacarias Castillo's house after the February 16, 2022 Board meeting, and yelled, screamed and threatened him because he did not vote the way Board Member Ghani wanted.

4. The Board's investigation substantiated that Board Member Ghani at either the June or July 2022 Board meeting made discriminatory comments about Board Member Castillo based on his race and nationality.

5. The Board's investigation substantiated that Board Member Ghani took the following actions at the September 22, 2022 Board meeting:

- a. Prior to the meeting beginning, Board President Wilbur Tillman instructed Board attorney Edward Wong to sit in the seat next to him. While in the process of taking a seat, Board Member Ghani physically moved the chair and her body in such a way that it made physical contact with attorney Wong forcing him out of the seat. Her assault of attorney Wong was observed by several Board members and the public who described her actions as rude and offensive.
- b. Board Member Ghani made several inappropriate public comments prior to the Board meeting in the presence of Board members and approximately 20 to 25 District employees and members of the public. Board Member Ghani used the public microphone to denigrate Board Members by saying they were duped and were being taken advantage of by outsiders. She also referred to Board Members as "snakes" and "greedy."

6. By the actions taken by Board Member Ghani, as described in paragraphs one (1) through five (5) of Charge Number Six set forth above, she engaged in the following misconduct: (a) Violated her oath of office as a Board Member in violation of the Illinois School Code (105 ILCS 5/10-16.5), and Board Policies 2:80, and 2:80-E Exhibit; (b) Engaged in official misconduct by a public officer (720 ILCS 5/33-3); and (c) Board Policy 2:220 setting forth School Board Meeting Procedures.

**REMOVAL OF RAYYA GHANI FROM OFFICE AND
DECLARE HER SEAT VACANT**

Pursuant to Section 25-2 of the Illinois Election Code, Section 10 ILCS 5/25-2 (Resignations and Vacancies, Events on Which an Elective Office Becomes Vacant), Section 3-15.5 of the Illinois School Code, Section 105 ILCS 5/3-15.5 (Removal of School Board Members), and Section 10-11 of the Illinois School Code, 105 ILCS 5/10-11 (Vacancies), and Board Policy 2:70 (Vacancies on the School Board - Filing Vacancies), the Board of Education of Dolton School District 149 declare:

1. Rayya Ghani is hereby officially and permanently removed from her Board seat; and
2. Rayya Ghani's Board seat is hereby declared vacant.

Member _____ moved adoption of the resolution.

Member _____ seconded the motion.

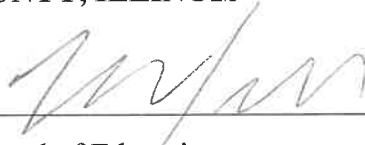
ADOPTED this 3rd day of November, 2022, by the following roll call vote:

Ayes: 4

Nays: 2

Absent: 0

**BOARD OF EDUCATION
DOLTON SCHOOL DISTRICT 149
COOK COUNTY, ILLINOIS**



President, Board of Education

Attest: 

Secretary, Board of Education