

FILED IN CLERK'S OFFICE
U.S.D.C. Atlanta

MAY 14 2019

JAMES IV.
By: 

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

NATHANIEL BORRELL DYER, :
Plaintiff, :

CIVIL ACTION FILE

v. :
:

NO. 1:18-CV-03284-CAP

ATLANTA INDEPENDENT :
SCHOOL SYSTEM, :
Defendant. :

_____ :

PLAINTIFF'S INITIAL DISCLOSURES

(1) State precisely the classification of the cause of action being filed, a brief factual outline of the case including plaintiff's contentions as to what defendant did or failed to do, and a succinct statement of the legal issues in the case.

Response:

The classification for this case is under Civil Rights. Plaintiff Pro Se, Nathaniel Borrell Dyer, brings this suit under 42 U.S.C. § 1983 against Atlanta Independent School System (AISS).

Count 1. Violation of the First Amendment to the United States Constitution By excluding Mr. Dyer from all school property with the AISS and instructing him not to have any communication whatsoever with any employee or representative

of the ABOE or APS for the duration of the suspension. This prohibition on communication includes, but is not limited to, verbal, written, electronic, or in-person communication has impermissibly burdened his ability to express himself, obtain information, and participate in the political process and has thereby violated the First Amendment.

Count 2. Violation of the Fourteenth Amendment to the United States Constitution By issuing criminal trespass orders in a way that creates a high-risk of the erroneous deprivation of rights, and by issuing a no-trespassing order deprived Mr. Dyer of his rights without notice or a meaningful opportunity to be heard, the defendant has contravened the Fourteenth Amendment guarantee of procedural due process.

(2) Describe in detail all statutes, codes, regulations, legal principles, standards and customs or usages, and illustrative case law which plaintiff contends are applicable to this action.

Response:

- AISS's Board of Education's policy for community meetings.
- *Chaparro v. Carnical Corp.*, 693 F.3d 1333, 1337 (11th Cir. 2012) (quoting *Ashcroft v. Iqbal*, 556 U.S. 662, 678 (2009)).
- *Bell Atl. Corp. v Twombly*, 550 U.S. 544, 570(2007); *Chandler v Sec'y of Fla. Dep't of Transp.*, 695 F.3d 1194, 1199 (11th Cir. 2012) (quoting *id.*).
- *Iqbal*, 556 U.S. at 678 (citation omitted) (quoting *Twombly*, 550 U.S. at 556); see also *Resnick v. AvMed, Inc.*, 693 F.3d 1317, 1324-25 (11th Cir. 2012).

- *Twombly*, 550 U.S. at 555-56 (citations omitted)
- *Powell v. Thomas*, 643 F.3d 1300, 1302 (11th Cir. 2011)
- *Tannenbaum v. United States*, 148 F.3d 1262, 1263 (11th Cir. 1998)
- *Baker v. McCollan*, 443 U.S. 137, 144 n.3 (1979)
- *Livadas v. Bradshaw*, 512 U.S. 107, 132 (1994)
- *Hale v. Tallapoosa Cty.*, 50 F.3d 1579, 1582 (11th Cir. 1995)
- *Cornelius v. NAACP Legal Def. & Educ. Fund, Inc.*, 473 U.S. 788, 797 (1985)
- *Trulock v. Freeh*, 275 F.3d 391, 404 (4th Cir. 2001)
- *Belyeu v. Coosa Cty. Bd. of Educ.*, 998 F.2d 925, 930 (11th Cir. 1993) (quoting *Curtis Publ'g Co. v. Butts*, 388 U.S. 130, 149 (1967))
- *Hustler Magazine, Inc. v. Falwell*, 485 U.S. 46, 50 (1988)
- *Bose Corp. v. Consumers Union of United States, Inc.* 466 U.S. 485, 503-04 (1984))
- *Snyder v. Phelps*, 562 U.S. 443, 458 (2001) (quoting *Texas v. Johnson*, 491 U.S. 397, 414 (1989))
- *Saxe v. State Coll. Area Sch. Dist.*, 240 F.3d 200, 206 (3d Cir. 2001)
- *Chaplinsky v. New Hampshire*, 315 U.S. 568, 571 (1942); *see also United States v. Stevens*, 559 U.S. 460, 468-69 (2010)
- *Meyer v. Grant*, 486 U.S. 414, 425 (1988) (quoting *Grant v. Meyer*, 828 F.2d 1446, 1457 (10th Cir. 1987))
- *Arcara v. Cloud Books, Inc.*, 478 U.S. 697 (1986)
- *Wright v. City of St. Petersburg*, 833 F.3d 1291 (11th Cir. 2016)

- *Cohen v. California*, 403 U.S. 15, 18 (1971)
- *Rodriquez v. Maricopa Cty. Cmty. Coll. Dist.*, 605 F.3d 703, 708 (9th Cir. 2010)
- *Hardy v. Jefferson Cmty.*, 260 F.3d 671, 679 (6th Cir. 2001)
- *Bonnell v. Lorenzo*, 241 F.3d 800, 820-21 (6th Cir. 2001)
- *Wilson v. Attaway*, 757 F.2d 1227, 1246 (11th Cir. 1985) (quoting *Chaplinsky*, 757 F.2d at 1242)
- *Cf. King v. Bd. of Cty. Comm'rs*, No 8:16-cv-2651-T_33TBM, 2018 WL 515350, at *2 (M.D. Fla. Jan. 23, 2018)
- *Jones v. Heyman*, 888 F.2d 1328, 1331 (11th Cir. 1989)
- *Barrett v. Walker Cty. Sch. Dist.*, 872 F.3d 1209, 1223-24 (11th Cir. 2017) (citation omitted) (quoting *Walker v. Tex. Div., Sons of Confederate Veterans, Inc.*, 135 S. Ct. 2239, 2250 (2015)).
- *Crowder v. Hous. Auth. of City of Atlanta*, 990 F.2d 586, 591 (11th Cir. 1993)
- *Perry Educ. Ass'n v. Perry Local Educators' Ass'n*, 460 U.S. 37, 45 (1983)
- *Board of Trs. of State Univ. of N.Y. v. Fox*, 492 U.S. 469, 480 (1989)
- *Elrod v. Burns*, 427 U.S. 347, 362 (1976)
- *Doe v. City of Albuquerque*, 667 F.3d 1111, 1131 (10th Cir. 2012)
- *Quiller v. Barclays Am./Credit, Inc.* 727 F.2d 1067, 1069 (11th Cir. 1984)
- *Asociacion de Educacion Privada de P.R., Inc. v. Echevarria-Vargas*, 385 F.3d 81, 86 (1st Cir. 2004)
- *Bourgeois v. Peters*, 387 F.3d 1303, 1319 (11th Cir. 2004)
- *United States v. Frandsen*, 212 F.3d 1231, 1236-37 (11th Cir. 2000))

- *Universal Amusement Co. v. Vance*, 587 F.2d 159, 165 (5th Cir. 1978) (quoting *Bantam Books, Inc. v. Sullivan*, 372 U.S. 58, 70 (1963))
- *Grayden v. Rhodes*, 345 F.3d 1225, 1232 (11th Cir. 2003)
- *Perry v. Sec'y, Fla. Dep't of Corr.*, 664 F.3d 1359, 1367-68 (11th Cir. 2011)
- *Cyr v. Addison Rutland Supervisory Union*, 955 F. Supp. 2d 290, 295-96 (D. Vt. 2013)
- *Zinerman v. Burch*, 494 U.S. 113, 127 (1990)
- *Parratt v. Taylor*, 451 U.S. 527, 538 (1985)
- *Daniels v. Williams*, 474 U.S. 327, 330 (1986)
- *Gilbert v. Homar*, 520 U.S. 924, 930 (1997)
- *Burch v. Apalachee Cmty. Mental Health Servs Inc.*, 840 F.2d 797, 801 (11th Cir. 1988); *see also Rittenhouse v. Dekalb Cty.*, 764 F.2d 1451, 1454 (11th Cir. 1985)
- *Keniston v. Roberts*, 717 F.2d 1295, 1301 (9th Cir. 1983)
- *Branch v. Franklin*, No. 1:06-cv-1853-TWT, 2006 WL 3335133, at *2 n.1 (N.D. Ga. Nov. 15, 2006)
- *Hudson v. Palmer*, 468 U.S. 517, 534 (1984)

Plaintiff reserves the right to supplement this response.

- (3) Provide the name and, if known, the address and telephone number of each individual likely to have discoverable information that you may use to support your claims or defenses, unless solely for impeachment, identifying the subjects of the information. (Attach witness list to Initial Disclosures as Attachment A.)

Response: Please see Attachment A. Plaintiff reserves the right to supplement this response.

- (4) Provide the name of any person who may be used at trial to present evidence under Rules 702, 703, or 705 of the Federal Rules of Evidence. For all experts described in Fed.R.Civ.P. 26(a)(2)(B), provide a separate written report satisfying the provisions of that rule. (Attach expert witness list and written reports to Responses to Initial Disclosures as Attachment B.)

Response: Plaintiff has not retained an expert at this time who may testify at trial. If Plaintiff later decides to call an expert witness at trial, it will amend its Initial Disclosures in accordance with both the Federal Rules of Civil Procedure and the Local Rules of the United States District Court for the Northern District of Georgia.

- (5) Provide a copy of, or a description by category and location of, all documents, data compilations or other electronically stored information, and tangible things in your possession, custody, or control that you may use to support your claims or defenses unless solely for impeachment, identifying the subjects of the information. (Attach document list and descriptions to Initial Disclosures as Attachment C.)

Response: Please see Attachment A. Plaintiff reserves the right to supplement this response.

(6) In the space provided below, provide a computation of any category of damages claimed by you. In addition, include a copy of, or describe by category and location of, the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered, making such documents or evidentiary material available for inspection and copying as under Fed.R.Civ.P. 34. (Attach any copies and descriptions to Initial Disclosures as Attachment D.)

Response: Please see attachement D. Plaintiff reserves the right to supplement this response.

(7) Attach for inspection and copying as under Fed.R.Civ.P. 34 any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in this action or to indemnify or reimburse for payments made to satisfy the judgment. (Attach copy of insurance agreement to Initial Disclosures as Attachment E.)

Response: Plaintiff does not maintain any applicable insurance policy.

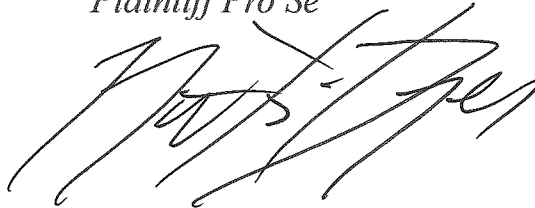
(8) Disclose the full name, address, and telephone number of all persons or legal entities who have a subrogation interest in the cause of action set forth in plaintiff's cause of action and state the basis and extent of such interest.

Response: At this time, Plaintiff does not contend that any other person or legal entity has a subrogation interest in the case of action. Plaintiff reserves the right to supplement this response.

Respectfully submitted this 13th day of May, 2019.

Nathaniel Borrell Dyer

Plaintiff Pro Se

A handwritten signature in black ink, appearing to read 'Nate Dyer', written over the typed name and title.

Nathaniel Borrell Dyer,

Plaintiff Pro Se

202 Joseph E. Lowery Blvd., NW

Atlanta, GA 30314

(404) 964-6427

nate@natbotheedge.com

CERTIFICATE OF COMPLIANCE

I certify that the foregoing was prepared using Times New Roman font, 14-point type, which is one of the font and print selections approved by the Court in L.R.5.1(B).

This 13th day of May, 2019.

A handwritten signature in black ink, appearing to read "Nathaniel Borrell Dyer". The signature is written in a cursive, somewhat stylized script.

Nathaniel Borrell Dyer

Plaintiff Pro Se

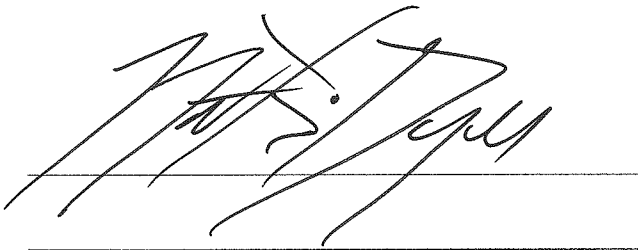
CERTIFICATE OF SERVICE

I hereby certify that on this 13th day of May, 2019, a copy of the document entitled **RESPONSE TO DEFENDANT'S NOTICE OF OBJECTION TO PLAINTIFF'S AMENDED RESPONSE TO DEFENDANT'S MOTION TO DISMISS FOR FAILURE TO STATE A CLAIM** was delivered by first class mail to:

Nelson Mullins Riley & Scarborough LLP
Atlantic Station / 201 17th Street, NW / Suite 1700
Atlanta, GA 30363

Nathaniel Borrell Dyer

Plaintiff Pro Se



A handwritten signature in black ink, appearing to read 'N. Borrell Dyer', is written over a horizontal line. A second horizontal line is drawn below the first one.

ATTACHMENT A

Each of the members below are employees of Nelson Mullins Riley & Scarborough
LLP and may be contacted at the following:

Nelson Mullins Riley & Scarborough LLP
201 17th Street NW, Suite 1700
Atlanta, GA 30363
Tel: 404.322.6000
Fax: 404.322.6050

D. Glenn Brock
General Counsel for AISS
Partner at Nelson Mullins Riley & Scarborough LLP
T 404.322.6336
M 404.322.6050

Laurance J. Warco
Assistant Counsel for AISS
Of counsel at Nelson Mullins Riley & Scarborough LLP
T 404.322.6177

ATTACHMENT B

Expert Witnesses and Reports

None at this time.

ATTACHMENT C

Document List and Descriptions

Videos:

- AISS Board Meeting pubic comment portion based on the letter sent from Courtney English to Plaintiff on October 11, 2016
- AISS Board Meeting pubic comment portion based on the letter sent from Jason Esteves to Plaintiff on February 8, 2019
- AISS Board Meeting pubic comment portion not allowing Plaintiff to speak after signing up on February 1, 2016
- AISS community meeting held at Grove Park Elementary pertaining to the Criminal Trespass Warning issued by former Chief Marquenta Hall Sands on February 2, 2016
- AISS community meeting held at Carver High School where Plaintiff was harassed by former Chief Marquenta Sands-Hall and board members for raising hand to ask Superintendent Meria Carstarphen a question.

Text message:

- Superintendent Meria Carstarphen's text dated March 2, 2015 to Plaintiff alerted him of Beverly Hall's passing
- The text states that Plaintiff's words were fair and kind

Documents:

- Criminal Trespass Warning dated February 2, 2016
- Criminal Trespass Warning dated February 29, 2016
- AISS Chief Applin's phone number given to Mr. Dyer to consider joining the steering committee on body cameras dated January 30, 2018
- North Atlanta High School PTSA (BOE Candidates Meeting Email)
- North Atlanta Parents for Public Schools Candidates Forum Email
- Atlanta Journal Constitution Article: Atlanta superintendent donates to school board candidate's campaign dated October 13, 2017
- Atlanta Public Schools Volunteer Release Form dated September 18, 2013
- Atlanta Public Schools Board Meeting Notice dated June 1, 2018
- Atlanta Public Schools Board Member Leslie Grant Community Coffees Email Notice dated May 29, 2018
- Boy Scouts of America Registration and Roster for 31 Scouts (Page 1 and 3) dated October 27, 2006 where plaintiff served as Scoutmaster at Kennedy Middle School
- Valentine Dance Announcement (Email) dated February 10, 2006 where Plaintiff was PTSA Vice-President #2 at Kennedy Middle School
- Receipt for 31 PTSA Members \$85.25 dated February 28, 2006 where Plaintiff was PTSA Vice-President #2 at Kennedy Middle School
- City of Atlanta Arrest Citation for Disorderly Conduct dated December 15, 2006
- Booking Mugshot of Nathaniel B. Dyer
- Letter #1 from Michael Walker, APS General Counsel dated December 14, 2006

- Letter #2 from Michael Walker, APS General Counsel dated December 14, 2006
- Letter from Damarus Perryman-Garrett, Director dated December 18, 2006 from Office of Internal Resolutions/Employee Relations
- Letter from APS Office of Internal Resolution Employee Relations dated February 12, 2007 and stamped received on March 16, 2007 concerning Plaintiff's volunteer status and access
- A Timeline of How The Atlanta School Cheating Scandal Unfolded updated April 02, 2015 (December 2008 - April 2015)
- Satirical Flyers

ATTACHMENT D

Damage Computation

Plaintiff is seeking \$10,000,000 for Compensatory and Punitive damages. Plaintiff is seeking \$5,000,000 for violation of his First Amendment Rights and \$5,000,000 for violation of his Fourteenth Amendment Rights. Plaintiff contends that the malicious acts perpetrated by the Defendant were intentional and motivated by ill will where conduct exceeded acceptable norms. Plaintiff's reputation suffered a loss due to purposeful communication of false information by the Defendant.

Computation by categories:

Emotional Anguish - \$4,000,000

- Labeling the Plaintiff as a pedophile as he is the founder of a youth organization that serves AISS students
- Prohibited from having any communication whatsoever with any employee or representative of the ABOE or AISS for the duration of a suspension.
- Prohibition on communication included, but was not limited to, verbal, written, electronic, or in-person communication.
- Manhandling Plaintiff out of meetings and constantly threatening him with arrest which supports the Defendant's negative narrative that caused a loss of respect, regard or confidence
- Interfering with Plaintiff's run for APS School Board in 2017 by emailing North Atlanta High School that he was not allowed on APS property and therefore he was uninvited

- Removed from his seat by force in front of parents and children for no apparent reason at a neighborhood school town hall meeting
- Unwarranted Criminal Trespass Warnings limited Plaintiff's voice in the community and his ability to support parent's requests for advocacy at their children's school.
- Accused Plaintiff of fighting a child at school and was falsely arrested during the Chief Sands era
- Reprimanded by former Chief Sands-Hall for raising his hand to ask a question at a school meeting and threatened with arrest.

Reputation - \$3,000,000

- Labeling the Plaintiff as a pedophile as he is the founder of a youth organization that serves AISS students
- Prohibited from having any communication whatsoever with any employee or representative of the ABOE or AISS for the duration of a suspension.
- Prohibition on communication included, but was not limited to, verbal, written, electronic, or in-person communication.
- Claiming that the Plaintiff would call the very children he is advocating for a term like "Sambos"
- Manhandling Plaintiff out of meetings and constantly threatening him with arrest which supports the Defendant's negative narrative that caused a loss of respect, regard or confidence

- Interfering with Plaintiff's run for APS School Board in 2017 by emailing North Atlanta High School that he was not allowed on APS property and therefore he was uninvited
- Removed from his seat by force in front of parents and children for no apparent reason at a neighborhood school town hall meeting
- Unwarranted Criminal Trespass Warnings limited Plaintiff's voice in the community and his ability to support parent's requests for advocacy at their children's school.
- Accused Plaintiff of fighting a child at school and was falsely arrested during the Chief Sands era

Humiliation - \$3,000,000

- Labeling the Plaintiff as a pedophile as he is the founder of a youth organization that serves AISS students
- Prohibited from having any communication whatsoever with any employee or representative of the ABOE or AISS for the duration of a suspension.
- Prohibition on communication included, but was not limited to, verbal, written, electronic, or in-person communication.
- Manhandling Plaintiff out of meetings and constantly threatening him with arrest which supports the Defendant's negative narrative that caused a loss of respect, regard or confidence

- Interfering with Plaintiff's run for APS School Board in 2017 by emailing North Atlanta High School that he was not allowed on APS property and therefore he was uninvited
- Removed from his seat by force in front of parents and children for no apparent reason at a neighborhood school town hall meeting
- Unwarranted Criminal Trespass Warnings limited Plaintiff's voice in the community and his ability to support parent's requests for advocacy at their children's school.
- Accused Plaintiff of fighting a child at school and was falsely arrested during the Chief Sands era

APPENDIX A

A1

October 27, 2006

Kennedy Middle School

Boy Scouts of America Registration
and Roster for 31 Scouts(Page 1 and 3)

Nathaniel B. Dyer, Scoutmaster

A2

February 10, 2006

Kennedy Middle School

Valentine Dance Announcement (Email)

Nathaniel B. Dyer, PTSA Vice-President

A3

February 28, 2006

Kennedy Middle School

Receipt for 31 PTSA Members \$85.25

Nathaniel B. Dyer, PTSA Vice-President

A1

**October 27, 2006
Kennedy Middle School
Boy Scouts of America Registration and Roster for 31 Scouts (Page 1)
Nathaniel B. Dyer, Scoutmaster**

Support #: 0075 06 01
Date: 12/21/2006
Page: 1 of 3

Organization: Troop 1181
15 West Atlanta
County: DeKalb
Troop: 1181
Expire Date: 12/31/2006

**John F. Bentley Middle School, 1181
151 James Rowley
Atlanta, GA 30114**

Executive Officer: 1077 West 14th St
Troop Leader Contact: 11
197 Westside Way SE Apt 1101
Atlanta, GA 30314-1500
Phone: 404-511-1744
Scoutmaster Unit: 11
Scoutmaster Name: Nathaniel Dyer
Begin Date: 02/22/2006
End Date: 02/27/2007

Position	Desired	Name	Address	Sex	DOB	Birth	Day	Phone
Scoutmaster	N	Nathaniel Dyer	1077 West 14th St Atlanta, GA 30114	M	02/22/2006	11	11	404-511-1744

Scoutmaster

A1

October 27, 2006
Kennedy Middle School
Boy Scouts of America Registration and Roster for 31 Scouts (Page 3)
Nathaniel B. Dyer, Scoutmaster

30 - Atlanta Area Council
 Keep America
 Boyer

Page 3 of 3

Printed: 10/27/06
 10:20:04
 10:20:04

Scout Roster

Name	Address	Scout	Text	Age	Birth Date	Grade	Sex	Other
				6	03/15/1998	7	M	
Scout				6	10/07/1998	8	M	
Scout				6	10/06/1998	7	M	
Scout				6	08/20/1999	6	M	
				5	09/01/1999	7	M	
Scout				6	05/14/1999	10	M	
Scout				6	08/01/1999	11	M	
				6	10/19/1999	11	M	

Scout Roster: 17

Even Adult: 0
 Paid Scout: 17
 Total: 17

--- End of Report ---

A2

February 10, 2006
Kennedy Middle School
Valentine Dance Announcement (Email)
Nathaniel B. Dyer, PTSA Vice-President

TO: All Teachers

FROM: Nathaniel Dyer, Vice-President, and PTA
Janice Scott, Eighth Grade Teacher

RE: Valentine Dance

DATE: February 10, 2006

The dance will take place in the school's gymnasium on February 14, 2006 at 2:45 p.m. until 3:45 p.m. Teachers will be given tickets to sell to students per homeroom count. Unsold tickets will be given to Mr. Dyer or J. Scott. This activity will be used as an incentive to alter the behavior of students. We would like for all students to attend the dance, however it will be the teacher's decision to allow students to make a ticket purchase. The charge for the dance is \$2.00. This will cover the Entry fee, snacks and drinks. Door prizes will be given away based on student's ticket. Reward those students who are most deserving. This will give the others the opportunity to improve and attend the next dance or activity. For more information, please contact Nathaniel B. Dyer at 404.522.2995 or Janice Scott.

A3

February 28, 2006
Kennedy Middle School
Receipt for 31 PTSA Members \$85.25
Nathaniel B. Dyer, PTSA Vice-President

RECEIPT

DATE <u>February 28, 2006</u>		NO. <u>328679</u>	
FROM <u>Kennedy Middle School</u>		<u>85</u> ²⁵	
<u>Eighty-five and ²⁵/₁₀₀</u>		DOLLARS	
FOR <u>Monthly dues - 31 members</u>			
ACCT.		<input checked="" type="radio"/> CASH	FROM
PAY.		<input type="radio"/> CHECK	TO
CLER.		<input type="radio"/> MONEY ORDER	<u>Margie Smith</u>

APPENDIX B

B1

December 15, 2006

City of Atlanta Arrest Citation for Disorderly Conduct

B2

Booking Mugshot of Nathaniel B. Dyer

B3

December 14, 2006

Letter #1 from Michael Walker, APS General Counsel

Letter #2 from Michael Walker, APS General Counsel

B4

December 18, 2006

Letter from Damarus Perryman-Garrett, Director

Office of Internal Resolutions/Employee Relations

B1

December 15, 2006
 City of Atlanta Arrest Citation
 for Disorderly Conduct



**CITY OF ATLANTA
 ARREST CITATION**

030780

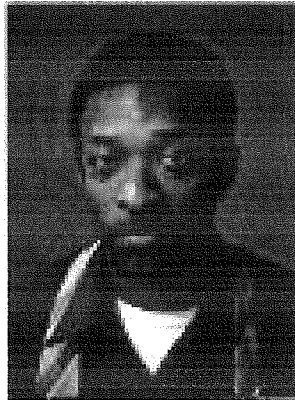
DEFENDANT'S SIGNATURE
 ARRESTING OFFICER'S SIGNATURE

1. Incident / Case Number		2. CA Copy #		3. IIR		4. Ready to Arrest <input type="checkbox"/> Yes <input type="checkbox"/> No	
5. <input type="checkbox"/> Reported Case <input type="checkbox"/> Unreported Case		6. Days: S M T W T F S		7. Court Day		8. Time	
9. Incident Report Made? <input type="checkbox"/> Yes <input type="checkbox"/> No		10. Incident Report Type		<input type="checkbox"/> Original <input type="checkbox"/> Supplemental		<input type="checkbox"/> Corroborate <input type="checkbox"/> Non-written	
11. Name (Last)		First		Middle		Suffix	
12. Address: St No		Street Name		Type		Apt. <input type="checkbox"/> NW <input type="checkbox"/> NE <input type="checkbox"/> SW <input type="checkbox"/> SE	
13. City		State		Zip		Telephone #	
14. Arrest Type		<input type="checkbox"/> PDP <input type="checkbox"/> CSW		15. Arrest #		16. Arresting State	
17. On		AM/PM		at the City of Atlanta		Check the above address and contents for accuracy of NOTICE: If arrest is based on a warrant, list the warrant # and issuing jurisdiction (attach if possible)	
18. <input type="checkbox"/> State law		19. <input type="checkbox"/> State law		20. <input type="checkbox"/> City of Atlanta		21. <input type="checkbox"/> State law	
22. <input type="checkbox"/> State law		23. <input type="checkbox"/> State law		24. <input type="checkbox"/> City of Atlanta		25. <input type="checkbox"/> State law	
26. <input type="checkbox"/> State law		27. <input type="checkbox"/> State law		28. <input type="checkbox"/> City of Atlanta		29. <input type="checkbox"/> State law	
30. In that the accused did							
31. Place of Offense (Street address) <input type="checkbox"/> NW <input type="checkbox"/> NE <input type="checkbox"/> SW <input type="checkbox"/> SE East							
32. Place of Arrest (Street address) <input type="checkbox"/> NW <input type="checkbox"/> NE <input type="checkbox"/> SW <input type="checkbox"/> SE East of Atlanta							
33. YOU ARE HEREBY COMMANDED to appear at the Municipal Court, General Division of the City of Atlanta, to be held at 150 Cemetery St., S.W. on the _____ day of _____, 2006 at _____ AM/PM on							
34. Arresting Officer (Last)		APD #		Radio #		35. Arresting Officer (Last)	
APD #		Radio #		36. Investigating Officer (Last)		APD #	
APD #		Radio #		37. Transporting Officer (Last)		APD #	
APD #		Radio #		38. Transporting Officer (Last)		APD #	
<p>39. ARRESTING OFFICER'S CERTIFICATION: The undersigned being duly sworn, upon oath, calls, disposes and serves all warrants and all other lawful process in the name and behalf of the State of Georgia and the City of Atlanta and hereby certifies that the information herein set forth is true and correct to the best of his/her knowledge and belief.</p> <p>OFFICER'S SIGNATURE _____</p> <p>These charges, warrants received for accuracy within the State of the State of Georgia and the City of Atlanta and have been served and returned before this day of _____, 2006.</p> <p>SUPERVISOR'S SIGNATURE _____</p> <p>36. Recycle This</p>							

B2

**Booking Mugshot
of Nathaniel B. Dyer**

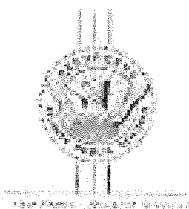
**DYER
NATHANIEL**



**Booking #: 0621382530
Complaint #: 063421378**

B3

**December 14, 2006
Letter #1 from Michael Walker,
APS General Counsel**



ATLANTA PUBLIC SCHOOLS

Office of the General Counsel

Center for Learning & Leadership
130 Trinity Avenue, S.W.
Atlanta, Georgia 30303

Phone (404) 803-1501
Fax (404) 803-1501

December 14, 2006

Mr. Nathaniel B. Dyer
202 Joseph E. Lowry Blvd., N.E.
Atlanta, Georgia 30314

Re: Volunteer Services - Kennedy Middle School
Serious Incident of December 8, 2006

Dear Mr. Dyer:

Until further notice, you are not to enter any Atlanta Independent School System (AIS) facility pending the outcome of investigation and disposition of allegations and/or charges related to an incident at Kennedy Middle School on Friday, December 8, 2006.

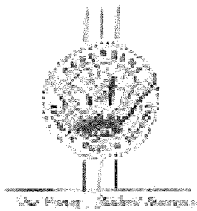
Sincerely,


Michael Walker
Assistant General Counsel

MW:gib

B3

**December 14, 2006
Letter #2 from Michael Walker,
APS General Counsel**



ATLANTA PUBLIC SCHOOLS

OFFICE OF THE GENERAL COUNSEL
CENTER FOR LEADERSHIP DEVELOPMENT
100 TRINITY AVENUE, S.W.
ATLANTA, GEORGIA 30303
(404) 522-2000
Fax (404) 522-1500

December 14, 2006

*Sent via Certified U.S. Mail,
Return Receipt Requested*

Mr. Nathaniel B. Dyer
202 Joseph E. Lowry Blvd., N.E.
Atlanta, Georgia 30314

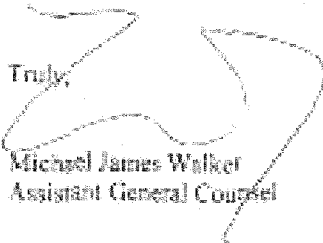
**In: Volunteer Services - Kennedy Middle School
Serious Incident of December 8, 2006**

Dear Mr. Dyer:

I am writing to provide this notice as a follow-up to the notice provided to you via hand delivery on December 14, 2006.

Until further notice, you are not to enter any Atlanta Independent School System (AIS) facility, or upon any AIS property, pending the outcome of the investigation and disposition of allegations and/or charges related to an incident at Kennedy Middle School on Friday, December 8, 2006.

Truly,


Michael James Walker
Assistant General Counsel

B4

December 18, 2006
Letter from Damarus Perryman-Garrett, Director
Office of Internal Resolutions/Employee Relations



Our Focus... Students' Success

ATLANTA PUBLIC SCHOOLS

DIVISION OF HUMAN RESOURCE SERVICES
110 TRINITY AVENUE, N.W.
ATLANTA, GEORGIA 30303-5624
(404) 892-2300

OFFICE OF INTERNAL RESOLUTION/EMPLOYEE RELATIONS

December 18, 2006

Mr. Nathaniel Dyer
302 Joseph E. Lowery Blvd, N.W
Atlanta, Georgia 30314

Dear Mr. Dyer:

This communication acknowledges receipt of a Complaint of Wrongdoing. You have been named as the person whom the complaint has been filed against.

The aforementioned was received in the Office of Internal Resolution/Employee Relations on **December 11, 2006**. This matter has been assigned to **Mrs. Sheryl D. Freeman, Employee Relations Officer**. The individual assigned to address this matter will contact you directly. If you desire, you may contact this individual by dialing **(404) 892-2372**.

At the conclusion of the investigation, a dispositional statement will be issued to you. This document will advise you of the determination made in this matter.

If you are unable to reach the person assigned to address this matter or if you otherwise have a need to do so, please feel free to telephone me at **(404) 892-2362**.

The Office of Internal Resolution/Employee Relations staff does not disclose information about matters being handled by the department to persons who do not have a legitimate need to know about the matter. However, upon written request by the involved parties, limited information may be provided to individuals specified by the involved party making the request. If it is your desire that such release be made, please complete and return the attached Authorization to Release Confidential Information form to the individual assigned to handle this matter.

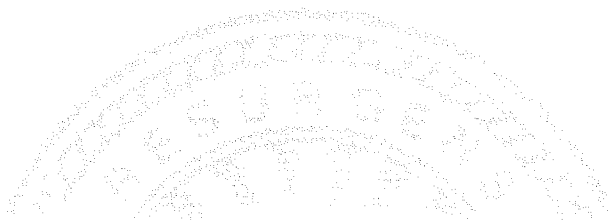
Cordially,

Damarus Perryman-Garrett
Director

gpc

Attachment: Authorization to Release Confidential Information, OIR Investigation Procedures

cc: Dr. Sharon Davis, Executive Director, School Reform Team I
Mrs. Linda Cumberland, Principal, Kennedy Middle School
OIR EW File: (In the Matter of TIVANUS L. v. Nathaniel Dyer)



APPENDIX C

Dated: February 12, 2007

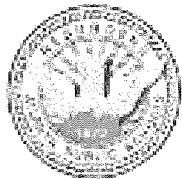
Stamped Received: March 16, 2007

Letter from APS Office of Internal Resolution Employee Relations

Re: Volunteer

C1

Dated: February 12, 2007
Stamped Received: March 16, 2007
Letter from APS Office of Internal Resolution Employee Relations (Page 1)
Re: Volunteer



Our Vision: Student Success

ATLANTA PUBLIC SCHOOLS

RECEIVED

MAR 16 2007

Office of Internal Resolution
Employee Relations
Atlanta Public Schools

Office of the Superintendent
100 Turner Dr., Atlanta, GA
Atlanta, Georgia 30303-0001

Raymond L. Holt, III
Superintendent

404.522.2820
404.522.1900 FAX

February 12, 2007

Via Certified Mail Return Receipt Requested

Mr. Nathaniel Dyer
202 Joseph E. Lowery Blvd, NW
Atlanta, Georgia 30314

RE: Volunteer

Dear Mr. Dyer:

An investigation has been conducted in response to receipt of a complaint of alleged employee wrongdoing on December 11, 2006. This complaint was filed against you on behalf of a student (Complainant) who is enrolled in the Atlanta Public School System. The investigation was conducted by Mrs. Sheryl Drake Freeman, Employee Relations Officer, Office of Internal Resolution/Employee Relations.

The Complainant has alleged that you engaged in the use of physical force on or about December 8, 2006. Specifically, the Complainant has alleged that you got into a physical altercation with the Complainant.

Direct witness testimony and information regarding the allegations were carefully considered and reviewed. Based on the totality of the evidence, I find that sufficient support exists for the allegations stated above. Therefore, it is my determination that there is a reasonable basis to conclude that a violation of APS policy, IFA, Corporal Punishment and the Use of Physical Force has occurred.

C1

Dated: February 12, 2007


Stamped Received: March 16, 2007

Letter from APS Office of Internal Resolution Employee Relations (Page 2)

Re: Volunteer

Given the nature of the above stated allegations, this letter serves to advise you that you will be removed from the volunteer list at Kennedy Middle School and will not be allowed to volunteer in any capacity with the Atlanta Public Schools. Thank you for your cooperation during this investigation. If you have any questions about this investigation, please contact Mrs. Damaris R. Perryman-Garrett, Director of the Office of Internal Resolution/Employee Relations, or Mrs. Freeman at (404) 802-2172 (V/IT).

Sincerely,



Beverly L. Hall, Ed.D.
Superintendent

HLH:sdh

cc: Ms. Kathy Augustine, Deputy Superintendent for Curriculum & Instruction
Dr. Sharon Davis, Executive Director, School Reform Team 1
Mr. Lucious Brown, Interim Principal, Kennedy Middle School
Ms. Frances Breakfield, Human Resource Generalist, SRT 1
Ms. Damaris R. Perryman-Garrett, Director, OIR/ER
{for OIR - EW file - In the matter of Nathaniel Dyer}

C1

Dated: February 12, 2007
Stamped Received: March 16, 2007
Letter from APS Office of Internal Resolution Employee Relations (Page 3)
Re: Volunteer



ATLANTA PUBLIC S

City of Atlanta

ATLANTA PUBLIC SERVICE
OFFICE OF INTERNAL RESOLUTION EMPLOYEE RELATIONS
100 TRINITY CENTER, S.W.
ATLANTA, GEORGIA 30334-2000

Handwritten: H.L. Ruffolo
PS 2-14



7501 1940 0000 4102 3512

RECEIVED MAIL



UNCLAIMED

Mr. Nathaniel Dye,
202 Joseph E. Lowmy Blvd. NW
Atlanta, Georgia 30334

30334-2000 CODE

Atlanta, Georgia 30334

5 04 54

C1

Dated: February 12, 2007

Stamped Received: March 16, 2007

Letter from APS Office of Internal Resolution Employee Relations (Page 4)

Re: Volunteer

Postage and Fees Guaranteed
FIRST CLASS PERMIT NO. 4000 ATLANTA, GA

SENDER COMPLETE THIS SECTION

- 1. Complete items 1, 2, and 3. Also complete item 4 if Registered Delivery is desired.
- 2. Print your name and address on the return so we may return the card to you.
- 3. Attach this card to the back of the envelope, so we can sort it easier for you.
- 4. Place addressed in:

Mr. Nathaniel Dyer
302 Joseph E. Lowery Blvd. NW
Atlanta, Georgia 30334

2. Article Number
Priority Mail code: **7025 1940 0000 4322 3512**
For Form 3817, February 2004

Domestic Return Receipt

COMPLETE THIS SECTION ON DELIVERY

- 1. Signature
 Agent Addressee
- 2. Received by (Print Name) Driver Delivery
- 3. If you have a return address, please print it Yes No
- 4. If you have a return address, please indicate Yes No

- 5. Service Fee Registered Mail Registered Mail Signature Confirmation Signature Confirmation Registered Mail Signature Confirmation Signature Confirmation
- 6. Certified Mail Registered Mail Registered Mail Signature Confirmation Registered Mail Signature Confirmation Registered Mail Signature Confirmation
- 7. Return Receipt for Merchandise Return Receipt for Merchandise Return Receipt for Merchandise
- 8. Return Receipt for Registered Mail Return Receipt for Registered Mail Return Receipt for Registered Mail

Number of Units



ATLANTA PUBLIC S

CERTIFIED MAIL



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5 04.64

City of Atlanta

OFFICE OF INTERNAL RESOLUTION/EMPLOYEE RELATIONS
DIVISION OF HUMAN RESOURCE SERVICES

OFFICE FOR TRAINING AND LEADERSHIP
191 TRINITY AVENUE, S.W.
ATLANTA, GEORGIA 30331-3600



UNCLAIMED

Mr. Nathaniel Dye,
202 Joseph E. Lowery Blvd. NW
Atlanta, Georgia 30314

Handwritten: NL RTM 2/3
70 2-11

3031448314 0023



Dated: February 12, 2007
Stamped Received: March 16, 2007
Letter from APS Office of Internal Resolution Employee Relations (Page 5)
Re: Volunteer

C1

APPENDIX D

Updated April 02, 2015

A Timeline of How The Atlanta School

Cheating Scandal Unfolded

December 2008 - April 2015

D

Updated April 02, 2015
A Timeline of How The Atlanta School (Page 1)
Cheating Scandal Unfolded
December 2008 - April 2015

A Timeline of How The Atlanta School Cheating Scandal Unfolded

Updated April 02, 2015

By Staff reports

A timeline of the Atlanta Public Schools cheating trial.
Atlanta Public Schools Testing Investigation and Trial: Complete coverage by
The Atlanta Journal-Constitution

December 2008

An AJC investigation highlights suspect scores on the state Criterion-Referenced Competency Test in five elementary schools, including one in Atlanta. APS responds that it has no plans to investigate.

Feb. 2009

Beverly Hall is named the national Superintendent of the Year by the American Association of School Administrators, which credits her for rising test scores and graduation rates. The group called Atlanta “a model of urban school reform.”

June 2009

A state investigation finds strong evidence of cheating on retests at one Atlanta school and three in other districts.

July 2009

The state Board of Education throws out math retest results from four schools, including Atlanta’s Deerwood Academy, despite Superintendent Beverly Hall’s statement that external investigators found no evidence of tampering.

August 2009

Hall describes APS as a model urban school district with double-digit test score gains. An AJC investigation shows the district fails to scrutinize many allegations of test cheating.

Oct. 2009

An AJC analysis shows statistically improbable increases on the state tests in a year’s time at a dozen Atlanta schools and seven others statewide. Hall and her aides say they don’t believe there was cheating.

Nov. 2009

Hall announces that national experts will review test scores at schools that recorded extraordinary improvements.

Feb. 2010

The state Board of Education orders districts to investigate 191 schools statewide for potential cheating, including the 58 in Atlanta.

D

Updated April 02, 2015
A Timeline of How The Atlanta School (Page 2)
Cheating Scandal Unfolded
December 2008 - April 2015

March 2010

LaChandra Butler Burks, chairwoman of the Atlanta school board, announces a “Blue Ribbon Commission” will oversee the district’s cheating investigation and that its members will be chosen from recommendations by the board, the Metro Atlanta Chamber and the nonprofit Atlanta Education Fund, a district advocacy group.

July 2010

The state board threatens to punish the district if it does not submit a report on its investigation by Aug. 2. The AJC reports that the APS panel looking into reports of cheating had ties to Hall or to the district, and that central office administrators took part in questioning potential witnesses.

Aug. 2010

After initially refusing to accept the Blue Ribbon Commission’s finding of cheating, the Atlanta school board relents. The commission concludes that cheating occurred at just 12 schools. The AJC reports that APS’ chosen investigators scrutinized fewer than half of the 58 schools in question. Gov. Sonny Perdue announces that special investigators will look into the cheating scandal.

Oct. 2010

Fifty GBI agents begin questioning Atlanta teachers and administrators about whether they falsified test results.

Nov. 2010

A study largely confirming the AJC’s 2009 analysis finally comes to light, months after Hall received drafts. Hall announces she will retire in June.

Dec. 2010

Fulton County District Attorney Paul Howard appoints two special prosecutors for a criminal probe of Atlanta schools. Allegations include possible felony charges of lying to agents or investigators and the destruction or altering of public documents. The AJC reports that Hall and other APS officials carried out a broad campaign over two years to suppress mounting allegations of widespread cheating.

Feb. 2011

State investigators say they uncovered a pattern of intimidation, threats and retaliation against APS employees who report cheating or other improprieties. They tell the district to drop plans to do its own cheating analysis, saying it would interfere with the governor’s special investigation. After the district refuses, a judge orders it to stop its internal probe.

July 2011

The AJC reports that a former high-ranking district official says Hall ordered the destruction of investigative documents detailing systematic cheating and ordered subordinates to omit adverse findings. At month’s end, Beverly Hall retires after 12 years with APS.

July 2012

Within days, specially appointed state investigators cite a wide range of cheating violations and organized and systemic misconduct in APS. Their report names 178 teachers, principals and administrators at 44 Atlanta schools. Eighty educators confessed to cheating, according to the report. Davis said most of the educators named in the report will remain on the payroll as the district decides what to do next. That same month, interim school superintendent Erroll Davis takes over.

D

Updated April 02, 2015
A Timeline of How The Atlanta School (Page 3)
Cheating Scandal Unfolded
December 2008 - April 2015

Feb. 2012

APS officials tell educators implicated in the state report they have one day to resign or face firing. "I do not intend to issue contracts to anyone who has not been exonerated," Superintendent Erroll Davis says. "I've made a commitment to parents that people who committed cheating, whether knowingly or unknowingly, will not be put in front of children until they are exonerated."

March 2012

The Atlanta school district begins disciplinary tribunals for educators accused of cheating who want to appeal their dismissals. The educators also face suspension or revocation of their teaching licenses by the Georgia Professional Standards Commission. The PSC says it won't hear appeals in the cases until the district attorney completes the criminal investigation.

June 2012

APS announces that 12 educators named in the investigation can return to the classroom after it determined there was not enough evidence to fire them.

July 2012

Cheryl Twyman, former principal at West Manor Elementary, becomes the first accused principal to be reinstated into a school district job after a year on paid administrative leave. The district determined there was insufficient evidence to prove that she violated any testing protocol. She receives a position at the central office.

Dec. 2012

The Atlanta school board votes 7-2 to renew the contract of Superintendent Erroll Davis, whose current contract expires in June. The 18-month contract extension gives the board an out if it votes to hire a replacement superintendent. Davis has said he does not want the job long-term.

March 2013

Of the 178 people implicated in the state investigative report, 21 educators have been reinstated and three people are still awaiting tribunal appeals, said APS spokesman Stephen Alford. About 150 educators resigned, retired or lost their appeals to retain their jobs.

Sept 2013

Tamara Cotman, who oversaw 21 north Atlanta schools, is found not guilty of trying to influence a witness after a 3-week trial. Cotman still faces racketeering charges. Prosecutors were hoping to make Cotman's case a test-run of their arguments.

Oct. 2013

Defendant Lisa Terry, a former Humphreys Elementary teacher, apologizes for her actions and pleads guilty to a misdemeanor charge of obstruction, agreeing to testify for the prosecution.

Dec. 2013

Armstead Salters, a principal at C.L. Gideons Elementary for three decades, pleads guilty to a felony count of making false statements and writings. Prosecutors say it was an "open secret" that cheating had been going on at Gideons for years.

D

Updated April 02, 2015
A Timeline of How The Atlanta School (Page 4)
Cheating Scandal Unfolded
December 2008 - April 2015

Feb. 2014

Millicent Few, a former APS human resources director, pleads guilty to misdemeanor malfeasance in office. Few is expected to testify that Beverly Hall ordered the destruction of internal investigative reports.

Feb. 2014

Of the original 35 educators indicted, 21 choose to enter guilty pleas by the deadline, leaving 13 to stand trial (one defendant passes away while waiting trial).

March 2014

Lawyers for Beverly Hall say that she is suffering from Stage IV breast cancer and is too ill to stand trial.

April 2014

It's revealed that prosecutors and lawyers for Hall tried to work out a deal where she would plead guilty to a single felony charge in exchange for probation. Sources familiar with the negotiations say the deal fell through over the issue of admitting wrongdoing.

April 2014

Two cancer experts disagree on whether Beverly Hall can withstand a trial. The emotional hearing includes an outburst by former Mayor Andrew Young.

July 2014

Judge Jerry Baxter says the trial can take no more delays and sets the trial for August for the remaining 12 defendants, without Beverly Hall.

March 2, 2015

Beverly Hall dies of breast cancer at 68.

March 16, 2015

Attorneys give closing statements.

March 19, 2015

Jury gets the case to consider.

April 1, 2015

Jury returns guilty verdicts for conspiracy and other felony charges for 11 of the defendants. Only former teacher Dessa Curb walked away with no convictions. The others are led out in handcuffs and booked into jail.

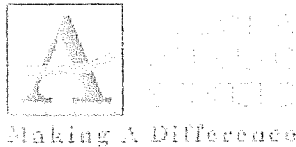
APPENDIX E

January 15, 2016

“Suspension from Public Comment at Atlanta Board
of Education Meetings” letter

E

January 15, 2016
"Suspension from Public Comment at Atlanta Board
of Education Meetings" letter



Courtney D. English
Chair, Atlanta Board of Education
Center for Learning & Leadership
130 Trinity Avenue, S.W.
Atlanta, Georgia 30303
Phone 404-802-2801
Fax 404-802-1801
www.atlantapublicschools.us

January 15, 2016

Via Email (nate@natbotheedge.com) and U.S. Mail

Nathaniel B. Dyer
202 Joseph E. Lowery Blvd NW
Atlanta, GA 30314

Re: Suspension from Public Comment at Atlanta Board of Education Meetings

Dear Mr. Dyer:

This letter is to inform you that your privilege to speak at any meeting sponsored by the Atlanta Board of Education (ABOE) is hereby suspended until July 2016.

This action is taken as a result of your public comments during community meeting portion of the January meeting of the ABOE. Using race-based slurs (including the "N" word, "coons," and "buffoons") was outside the bounds decorum that such a setting demands. They were not only disrespectful but were offensive to our board, our superintendent and our staff. Further, those abusive comments failed to advance any meaningful discourse upon which the board or superintendent could possibly act. As Chairman of the Board, I cannot and will not allow such abhorrent and hate-filled epithets, that can create a hostile work environment, during a meeting of an organization where the sole purpose is to advance the education of children. Members of our staff must attend our meetings as well as children along with their families are often present and none of them deserve to be subjected to such behavior.

I would further advise you that any further demonstration of such conduct may result in additional consequences including permanent suspension of your privilege to speak at APS board meetings.

Sincerely,

/s/ Courtney D. English

Courtney D. English

cc: Meria J. Carstarphen, Superintendent
D. Glenn Brock, General Counsel

APPENDIX F

February 2, 2016

Criminal Trespass Warning

F

February 2, 2016
Criminal Trespass Warning



ATLANTA PUBLIC SCHOOLS
CRIMINAL TRESPASS WARNING

Case Number: _____

For the Student's Signature

I, Mate D. Dyer hereby understand that I have been issued a criminal trespass warning by an official of the Atlanta Public Schools. I also understand that I am not permitted to enter upon any property owned or leased by the Atlanta Public Schools or attend any public gathering activities such as athletic events, plays, etc. Any violation of this warning may result in arrest for violating the Official Code of Georgia Annotated (OCGA) title Criminal Trespass - a person commits the offense of criminal trespass when he or she knowingly and without authority:

- 1) Enters upon the land or premises of another person or into any part of any vehicle, railroad car, aircraft, or watercraft of another person for an unlawful purpose;
- 2) Enters upon the land or premises of another person or into any part of any vehicle, railroad car, aircraft, or watercraft of another person after opening, prior to such entry, a locked door, window, right of entrance, or other proper identification, an authorized representative of the owner or rights occupant, but such entry is prohibited;
- 3) Remains upon the land or premises or another person or into the vehicle, railroad car, aircraft, or watercraft of another person after receiving notice from the owner, rights occupant, or other proper identification, an authorized representative of the owner or rights occupant to depart.

A person who commits the offense of criminal trespass shall be guilty of a misdemeanor,
defined by O.C.G.A. § 16-7-21, et. seq.

I understand that I may be taken to school on Atlanta Public School Property (Board Meeting)
2/2/16 refuse to sign Off. J. G. Ford
Date Signature Witness/Officer

Witness Signature:

Police Police Department:

Date: 2/2/16

APPENDIX G

February 29, 2016

Criminal Trespass Warning

G

February 29, 2016
Criminal Trespass Warning



ATLANTA PUBLIC SCHOOLS
CRIMINAL TRESPASS WARNING

Case Number: _____

Parent/Guardian/Student Signature:
Nicholas Dyer

I hereby understand that I have been issued a criminal trespass warning by an official of the Atlanta Public Schools. I also understand that I am not permitted to enter upon any property owned or leased by the Atlanta Public Schools or attend any extra-curricular activities such as athletic events, plays, etc. Any violation of this warning may result in arrest for violating the Official Code of Georgia Annotated 16-7-23(b) Criminal Trespass - a person commits the offense of criminal trespass when he or she knowingly and without authority:

- 1) Enters upon the land or premises of another person or into any part of any vehicle, railroad car, aircraft, or watercraft of another person for an unlawful purpose;
- 2) Enters upon the land or premises of another person or into any part of any vehicle, railroad car, aircraft, or watercraft of another person after receiving notice in such entry notice from the owner, lawful occupant, or upon proper identification, an authorized representative of the owner or lawful occupant that such entry is forbidden; or
- 3) Enters upon the land or premises of another person or within the vehicle, railroad car, aircraft, or watercraft of another person after receiving notice from the owner, lawful occupant, or upon proper identification, an authorized representative of the owner or lawful occupant to depart.

A person who commits the offense of criminal trespass shall be guilty of a misdemeanor.
(Code by O.C.G.A. 16-7-23(b), O.C.G.A. 16-7-23(c))

I understand that I may return to school on _____

July 1, 2016

2129116
Date

Marguerite A. Hall
Signature

[Signature]
Witness/Officer

Write: Offender

Yellow: Police Department

Blue: File

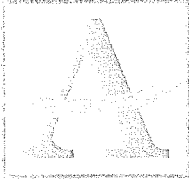
APPENDIX H

October 11, 2016

“Suspension from Public Comment at Atlanta Board
of Education Meetings” letter

H

October 11, 2016
"Suspension from Public Comment at Atlanta Board
of Education Meetings" letter



Courtney D. English
Chair, Atlanta Board of Education
Center for Learning & Leadership
130 Trinity Avenue, S.W.
Atlanta, Georgia 30303
Phone 404 802 2801
Fax 404-802-1801
www.atlantapublicschools.us

October 11, 2016

Via Personal Delivery

Nathaniel B. Dyer
202 Joseph E. Lowery Blvd NW
Atlanta, GA 30314

Re: Suspension from Public Comment at Atlanta Board of Education Meetings

Dear Mr. Dyer:

This letter is to inform you that, once again, your privilege to speak at any meeting sponsored by the Atlanta Board of Education ("ABOE") is hereby suspended until December 31, 2017. In addition, this will serve as a trespass warning. You are instructed not to set foot on Atlanta Public Schools ("APS") property for the remainder of this year and next year. If you do, you will be arrested for trespassing. These actions are a direct result of your inappropriate and disruptive behavior at yesterday's October 10, 2016 ABOE meeting.

As you know, on January 15, 2016, you were suspended from speaking at any ABOE meeting because of your use of several racial slurs during the public comment portion of the January ABOE meeting (see attached 1/15/2016 letter from C. English to you). You then attended a town hall meeting and disrupted the meeting being led by Dr. Carstarphen's senior staff. As a result of that behavior, Former APS Chief of Police Sands issued a trespass warning against you, prohibiting you from coming onto school property. (Copy attached). You were notified that any future similar demonstration may result in additional suspensions. Your suspension at that time ended in July 2016.

Nevertheless, on October 10, 2016, you brazenly ignored our previous warnings and again, you used a racial slur when you referred to APS students as "sambos" during the public comment portion of the ABOE meeting. You also referenced on the official sign-in sheet to speak at the ABOE meeting having previously spoken to "[a]ll of these fools." (Copy attached). Your insulting comments, particularly your reference to APS students as "sambos," are completely outside the bounds of civility and, as before, were offensive to the Board, our Superintendent, and our staff and community. Your comments failed to advance any meaningful discourse upon which the Board or Superintendent could possibly act.

In addition to subjecting everyone in the meeting to your offensive language, you refused to leave the podium after I repeatedly directed you to do so. Police ultimately escorted you from

A3

October 11, 2016
"Suspension from Public Comment at Atlanta Board
of Education Meetings" letter

Nathaniel B. Dyer
October 11, 2016

Page 2 of 2

the meeting room, but you continued to disrupt the meeting by shouting within and outside of the room. We cannot and we will not allow such abhorrent and hate-filled behavior in a meeting of an organization whose sole purpose is to educate children.

I would further advise you that any further demonstration of such conduct may result in additional consequences, including permanent suspension of your privilege to speak at APS board meetings.

Sincerely,

/s/ Courtney D. English

Courtney D. English

Enclosures

cc: Meria J. Carstarphen, Superintendent
Ronald Applin, APS Chief of Police
D. Glenn Brock, General Counsel

APPENDIX I

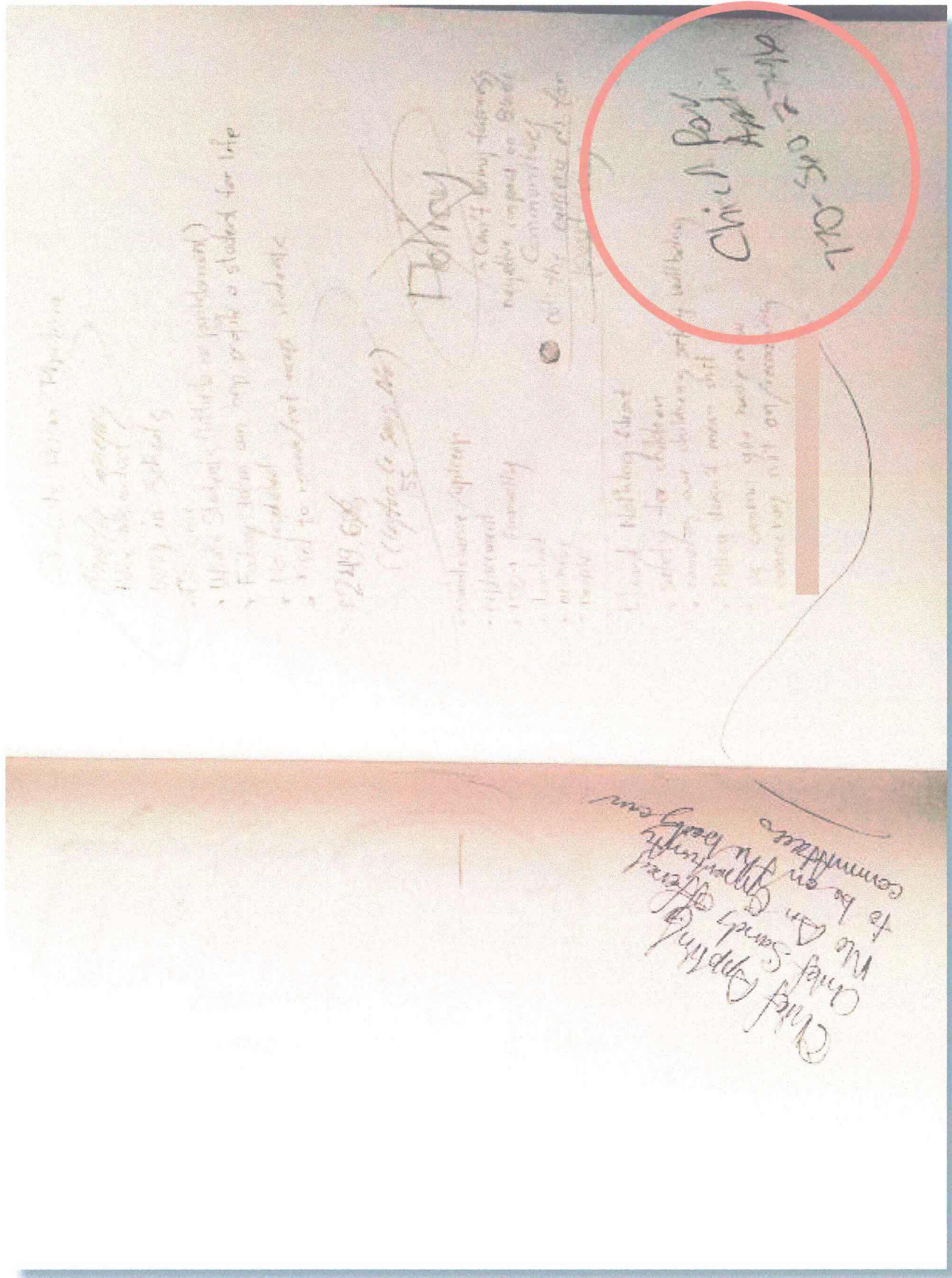
January 30, 2018

AISS Chief Applin's phone number given to Mr. Dyer to consider
joining the steering committee on body cameras.

I

January 30, 2018

AISS Chief Applin's phone number written in Mr. Dyer's sketchbook after a meeting held at Mays High School on body cameras.



APPENDIX K

September 19, 2017

North Atlanta High School PTSA

BOE Candidates Meeting Email

K

September 19, 2017
North Atlanta High School PTSA
BOE Candidates Meeting Email

5/17/2018

Roundcube Webmail :: Fwd: NAHS PTSA BOE Candidates Meeting

Subject **Fwd: NAHS PTSA BOE Candidates Meeting**
From district7@nathanielbdyer.com <district7@nathanielbdyer.com>
To Adrian Neely <anneely@hotmail.com>
Date 2017-09-19 11:49
Here you go. Thanks!



Sent from my iPhone

Begin forwarded message:

From: NAHS PTSA <nahsptsa@gmail.com>
Date: September 11, 2017 at 4:07:59 PM EDT
To: district7@nathanielbdyer.com
Subject: Re: NAHS PTSA BOE Candidates Meeting

Dear Mr. Dyer,

Since sending this invitation, the PTSA has been advised by APS General Council that you are not allowed on APS property, including schools, through 12/31/17. Accordingly, we must rescind the invitation to you to attend this meeting.

NAHS PTSA

On Mon, Aug 28, 2017 at 1:21 PM, NAHS PTSA <nahsptsa@gmail.com> wrote:



North Atlanta High School PTSA

Dear Mr. Dyer,

North Atlanta High School's PTSA is inviting you to you attend our General PTSA meeting, at North Atlanta High School, on Friday, September 22, at 9:00am. This meeting will feature a question and answer session with the APS Board of Education candidates running in districts inclusive of NAHS. Please let us know if you are able to attend by responding to this email. We look forward to hearing from you.

Thank you,

Laura Denning

President NAHS PTSA
404-790-6335c

APPENDIX L

Monday 20:30

North Atlanta Parents for Public Schools

Candidates Forum Email

L

Monday 20:30
North Atlanta Parents for Public Schools
Candidates Forum Email

Email Thread from NAPPS

From
North Atlanta Parents for Public Schools
To
district7@nathanielbdyer.com
Date
Mon 20:30

Mr. Dyer,

We must rescind our invitation to you for the candidate forum to be held Wednesday at Sutton Middle School. It was brought to our attention that you have been served notice by APS Police that you are not allowed on any APS property for the remainder of 2017. Please note that we have shared your video on our Facebook page.

Sincerely,
NAPPS Board of Directors

On Fri, Sep 8, 2017 at 1:13 PM, <district7@nathanielbdyer.com> wrote:

Hello Aquaria Smith and Karen Yanoshik,

Please accept this email as confirmation to attend the NAPPS Candidates Forum on October 18, 2017. Thanks for the opportunity.

Nate
The Nathaniel Borrell Dyer Campaign

APPENDIX M

October 13, 2017

Atlanta Journal Constitution Article:

Atlanta superintendent donates to
school board candidate's campaign

M

October 13, 2017

Atlanta Journal Constitution Article:

Atlanta superintendent donates to school board candidate's campaign (Page 1)

Atlanta superintendent donates to school board candidate's campaign

Oct 13, 2017

By Vanessa McCray, The Atlanta Journal-Constitution



APS Superintendent Meria Carstarphen, left, and school board member and 2017 candidate Jason Esteves are pictured in AJC file photos.

Atlanta Public Schools Superintendent Meria Carstarphen dipped a toe into school board politics with a \$500 contribution to an incumbent running unopposed in his re-election bid.

Carstarphen donated the money in late August to the campaign of Jason Esteves, an at-large Atlanta Board of Education member. He faces no challengers on the Nov. 7 ballot. "I know the work that he's doing. It's beyond the school system, and that was more the spirit with which I made the contribution," Carstarphen said. She highlighted his advocacy work on behalf of the district's Hispanic students and families, including promoting college access for those students. The superintendent noted she's not prohibited from making donations to a candidate, though the contribution has raised some eyebrows. "We're still allowed to be engaged in the political process," Carstarphen said.

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The superintendent should have sent Esteves flowers or a thank you note to show her appreciation, not campaign money, said Sara Henderson, executive director of the watchdog group Common Cause Georgia.

“What is the intention of the gift?” she said. “It makes it look like the superintendent is trying to influence Mr. Esteves and his vote on the school board. This is not a huge amount of money obviously, but even \$2 doesn’t look good.” Henderson said such actions can diminish the district’s work to restore public trust after a massive cheating scandal took place before Carstarphen’s hiring.

She called on Esteves to return the donation. He did not immediately return a call for comment Friday. “APS has been through so much already. For her to do this, it negates the authority or confidence [they’re] trying to build back,” Henderson said.

Esteves’ campaign made contributions in September to three of his four fellow school board members running for re-election in contested races, according to the most recent campaign finance disclosure reports which were due to be filed late last week. His campaign gave the maximum allowable donation — \$2,600 — to incumbent Eshé Collins, who is battling three challengers to retain her District 6 seat representing South Atlanta. It also gave \$2,350 to Cynthia Briscoe Brown, the incumbent running against two opponents for another at-large seat. Her campaign report also lists a \$250 donation from Esteves himself. Esteves’ campaign gave \$1,000 to incumbent Byron Amos, running against two opponents to keep his District 2 seat representing central Atlanta.

Carstarphen said she has not endorsed any school board candidates and said she considers it her “duty” to educate the public about APS. “I trust the voters of Atlanta. They are the people who voted for the people who hired me. I still know that I, in part, came here because the will of the people created this collection of [a] governance team for public education, and that team on behalf of the public picked me,” she said.

Carstarphen was hired in 2014 by a unanimous vote of the current board.

APPENDIX J

February 8, 2018

“Suspension from Public Comment at Atlanta Board
of Education Meetings” letter

J

February 8, 2018
"Suspension from Public Comment at Atlanta Board
of Education Meetings" letter (Page 1)



ATLANTA
PUBLIC
SCHOOLS

Jason Esteves
Chair, Atlanta Board of Education
Center for Learning & Leadership
130 Trinity Avenue, S.W.
Atlanta, Georgia 30303
Phone 404-802-2801
Fax 404-802-1801
www.atlantapublicschools.us

February 8, 2018

Via Personal Delivery

Nathaniel B. Dyer
202 Joseph E. Lowery Blvd NW
Atlanta, GA 30314

Re: Suspension from Public Comment at Atlanta Board of Education Meetings

Dear Mr. Dyer:

This letter is to inform you that your privilege to speak at any meeting sponsored by the Atlanta Board of Education ("ABOE") is hereby suspended for one year beginning on February 6, 2018. In addition, this letter will serve as a trespass warning. You are instructed not to set foot on Atlanta Public Schools ("APS") property during this one-year suspension. If you do, you will be arrested for trespassing. You are further instructed not to have any communication whatsoever with any employee or representative of the ABOE or APS for the duration of this suspension. This prohibition on communication includes, but is not limited to, verbal, written, electronic, or in-person communication. These actions are a direct result of yet another instance of inappropriate and disruptive behavior by you at the February 5, 2018 ABOE meeting. This is your *third* violation of ABOE directives to you, and future occurrences will not be tolerated.

As you know, on January 15, 2016, you were suspended from speaking at any ABOE meeting because of your use of several racial slurs during the public comment portion of the January 2016 ABOE meeting. You then attended a town hall meeting and disrupted the meeting being led by Dr. Carstarphen's senior staff. As a result of that behavior, Former APS Chief of Police Sands issued a trespass warning against you, prohibiting you from coming onto school property. You were notified that any future similar demonstration may result in additional suspensions. (Exhibit A – January 15, 2016 Letter). Your suspension at that time ended in July 2016. However, despite that warning, on October 10, 2016, you used a racial slur when you referred to APS students as "sambos" during the public comment portion of the ABOE meeting. That behavior led to another suspension and trespass warning through December 31, 2017. (Exhibit B – October 11, 2016 Letter). You were also warned that similar conduct in the future could lead to additional consequences, including permanent suspension of your privilege to speak at APS board meetings.

Nevertheless, on February 5, 2018, you once again introduced racist and hate-filled epithets at an ABOE meeting. Specifically, you passed out flyers to audience members that contained the

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February 8, 2018
"Suspension from Public Comment at Atlanta Board
of Education Meetings" letter (Page 2)

Nathaniel B. Dyer
February 8, 2018

Page 2 of 2

phrase "unnigged coming soon" and that contained a picture of Superintendent Carstarphen wearing a photoshopped football jersey with the name "FALCOONS" on it. (Exhibit C – February 5, 2018 Flyer). These insulting references are completely outside the bounds of civility and, as before, were offensive to the Board, our Superintendent, and our staff and community. These references fail to advance any meaningful discourse upon which the Board or Superintendent could possibly act. We cannot and we will not allow such abhorrent and hate-filled behavior in a meeting of an organization whose sole purpose is to educate children.

I once again further advise you that any further demonstration of such conduct may result in additional consequences, including permanent suspension of your privilege to speak at APS board meetings.

Sincerely,

/s/ Jason Esteves

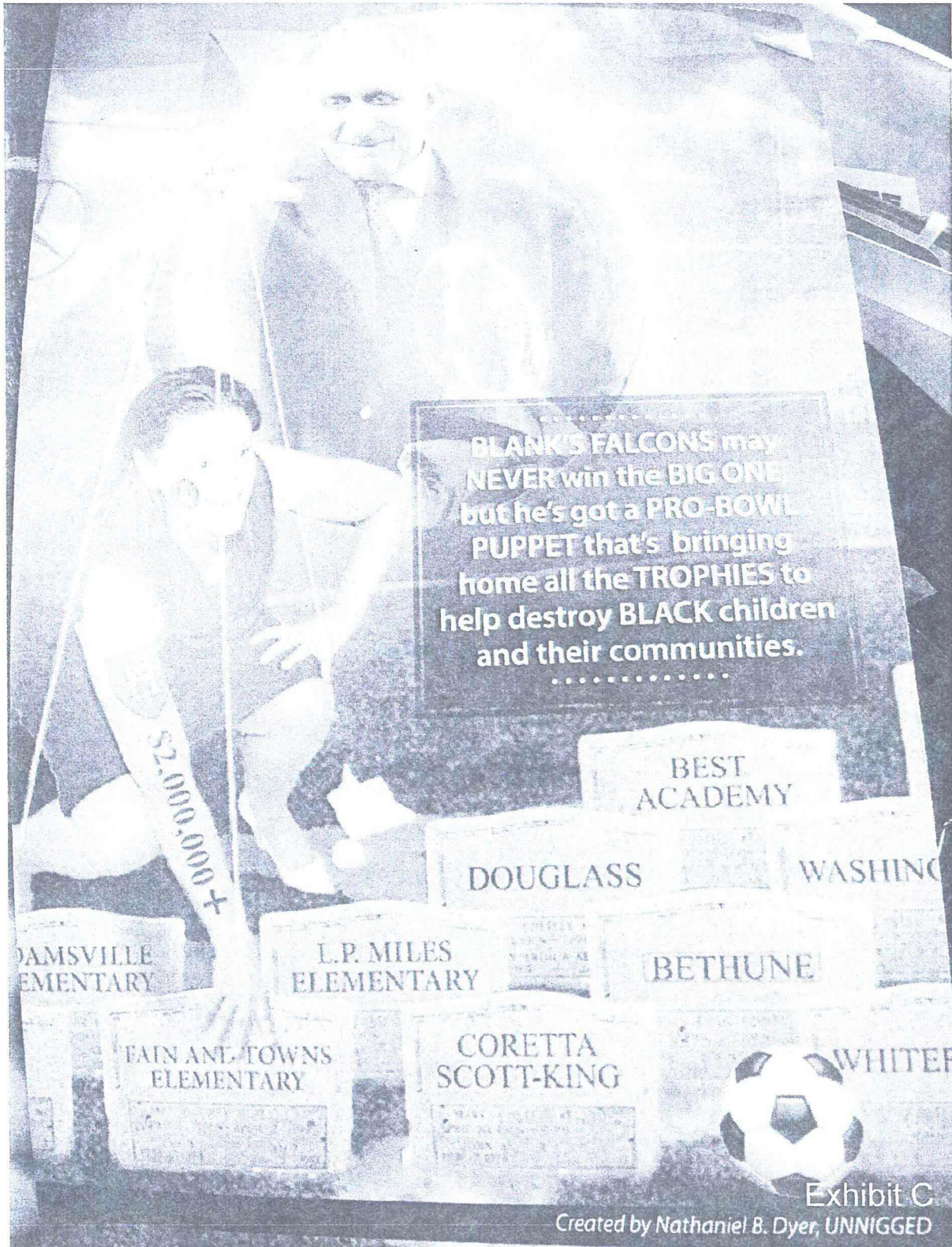
Jason Esteves

cc: Meria J. Carstarphen, Superintendent
Ronald Applin, APS Chief of Police
D. Glenn Brock, General Counsel

J

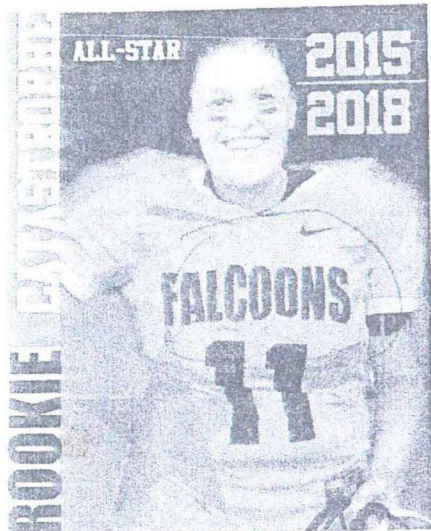
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"Suspension from Public Comment at Atlanta Board of Education Meetings" letter (Page 3)



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February 8, 2018
"Suspension from Public Comment at Atlanta Board of Education Meetings" letter (Page 4)



SUPERINTENDENT
Meria Catastrophe's
**TOP 10
CATASTROPHIC
PLAYS**

- 1 **SELLING SCHOOLS** - She tackles the issues of deeds from the city to sell them to developers for gentrification of Black neighborhoods.
- 2 **CLOSING SCHOOLS** - She closed schools such as Bethune ES and Kennedy MS located in the midst of a minimum of five billion dollars in development which includes Arthur Blank's Mercedes Benz Stadium Project.
- 3 **MERGING SCHOOLS** - She has merged Black students together into overcrowded situations while proposing options to alleviate overcrowding for White students.
- 4 **PRIVATIZING SCHOOLS** - She gives private operators, Purpose Built Communities and Kindsi, carte blanc and long contracts with little to no accountability.
- 5 **CHARTER SCHOOLS** - She places Kindsi and KIPP schools in the heart of neighborhoods where she claims there is low student population. Her latest KIPP move will kill Douglas High School.
- 6 **OPPORTUNITY SCHOOL DISTRICT (OSD)** - She hired the architect of Gov. Nathan Deal's OSD proclaiming to save schools from takeover but she closed them instead.

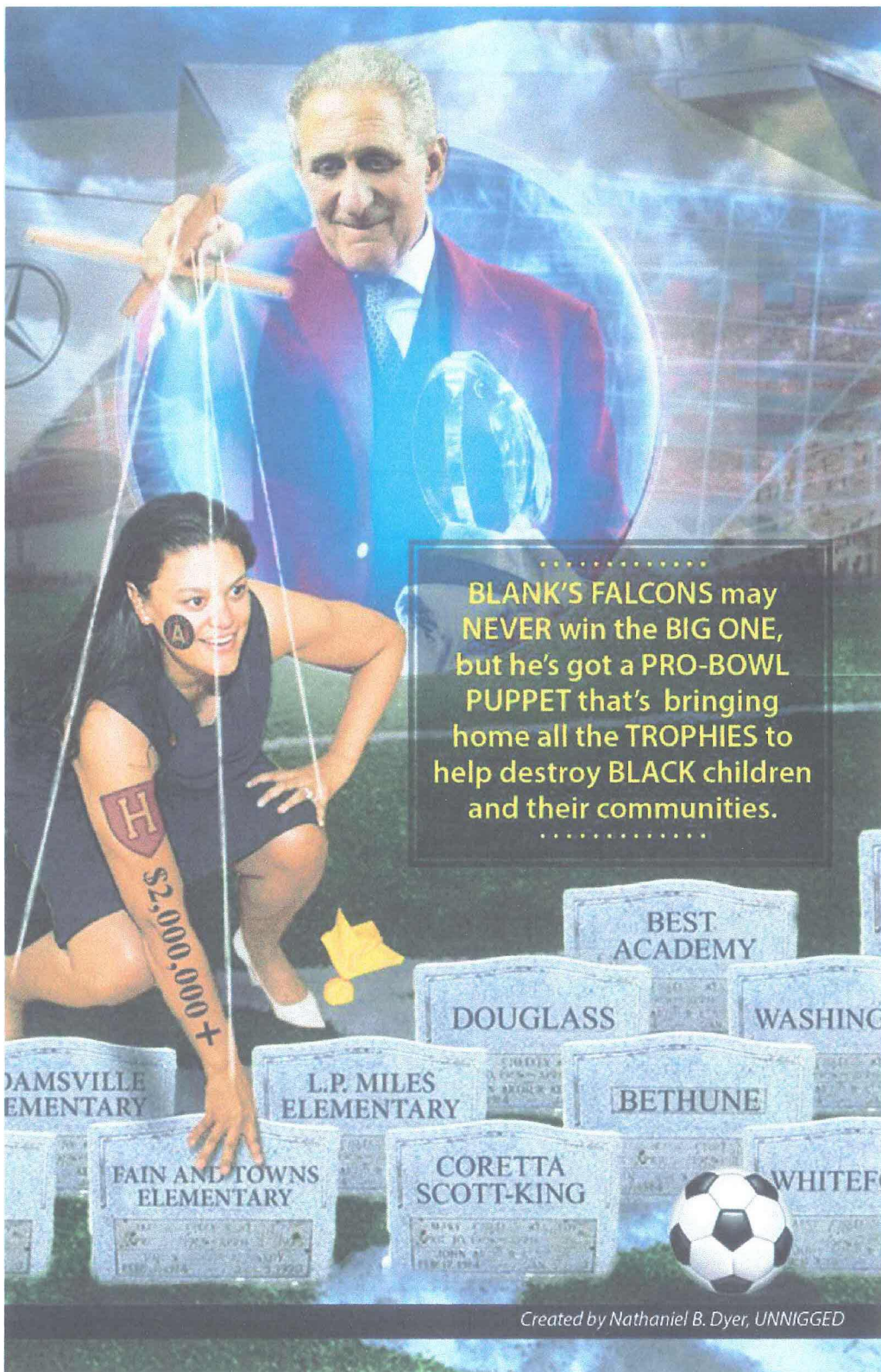
- 7 **AGE DISCRIMINATION** - More than 100 teachers over 40 are suing this rookie for age discrimination. The culture of fear and intimidation still exists within Atlanta Public Schools and it may have intensified.
- 8 **POLICE FORCE** - She created a police force claiming they are to aid with mentoring students. To date, bullying and discipline issues are still prevalent within APS at an all-time high.
- 9 **BODY CAMERAS FOR OFFICERS** - Offering little money for exposure and resources to help children, this rookie wants to expose them in a hi-tech manner to be legally profiled for life.
- 10 **INEQUITIES** - She caters heavily to White communities through whatever measures it takes to help them maintain stability and an uninterrupted learning experience. Anything to the contrary, this would cause White Flight. And Lawdy, She's Sho nuffin Don't Wants Dat!

It's time to retire this rookie. A new contract cannot be an option for what this third year rookie has done to Atlanta's children who possess so much promise and potential.

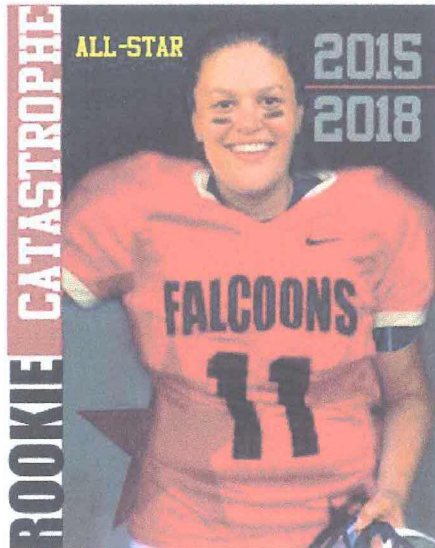
UNNIGGED COMING SOON! For more information, please contact Nathaniel B. Dyer at 404.964.6427 or email district7@nathanielbduer.com

J

February 8, 2018
Front of Flyer



J

February 8, 2018
Back of Flyer

SUPERINTENDENT *Meria Catastrophe's* TOP 10 CATASTROPHIC PLAYS

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- 2 CLOSING SCHOOLS** - She closed schools such as Bethune ES and Kennedy MS located in the midst of a minimum of five billion dollars in development which includes Arthur Blank's Mercedes Benz Stadium Project.
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UNNIGGED COMING SOON! For more information, please contact Nathaniel B. Dyer at 404.964.6427 or email district7@nathanielbdyer.com.

APPENDIX M

September 18, 2013

Atlanta Public Schools Volunteer Release Form



September 18, 2013
Atlanta Public Schools Volunteer Release Form



Volunteer Release Form

Volunteering Location

School/Site: Brown MS Administrator: Creams

Volunteer Contact Information

Volunteer Name: Dyer Nathaniel Borrell
LAST FIRST MIDDLE

Volunteer Date of Birth: 01/17/70
MONTH/DAY/YEAR

Home Address: 202 Lowmy Blvd NW Atlanta, GA 30314
STREET ADDRESS/CITY/STATE/ZIP

Phone: 404.964.6427 Email: nate@natbothedge.com

Agency or Organization (if applicable): KIDS FIRST!

Volunteer Release

Are you currently an APS employee or a parent/guardian or relative of students in APS?
If yes, please list schools and student names: No

Have you ever been convicted of an offense that requires registration as a sex offender? Yes No

In this application, I have provided accurate information to the best of my ability. I have received any training required for my volunteer position, and I understand and will comply with the expectations of volunteers in the Atlanta Public Schools described in [regulation IFCD-R School Volunteers](#). I also understand that Atlanta Public Schools reserves the right to refuse the services offered by my volunteer.

Applicant Signature: [Signature] Date: 9/18/13

For official use only

For Level 2 Volunteers Only

- Sex offender registry search completed
- Copy of Photo ID attached

Approved Denied - Reason: _____

Site Administrator/Designate Signature

Printed Name & Title

Date

For Level 3 Volunteers Only

- Background check on file in HR Division
- Copy of Photo ID attached

Approved Denied - Reason: _____

HR Division Representative Signature

Printed Name & Title

Date

APPENDIX N

N1

June 1, 2018

Atlanta Public Schools Board Meeting Notice

N2

May 29, 2018

Atlanta Public Schools Board Member Leslie Grant

Community Coffees Email Notice

N1

June 1, 2018
Atlanta Public Schools Board Meeting Notice



THE ATLANTA BOARD OF EDUCATION

150 Trinity Avenue, SW, Atlanta, GA 30303 * 404-802-1200 (P) 404-802-1204 (F)

Meeting Notice for Monday, June 4, 2018

2:30 PM: ATLANTA BOARD OF EDUCATION MEETING*

Presentations and Discussion

6:00 PM: COMMUNITY MEETING

The Atlanta Board of Education welcomes input from students, staff, parents and members of the community on any agenda or non-agenda item - *with the exception of personnel matters.*

All speakers must sign in using the *Community Feedback Form* between 5:00 p.m. - 5:50 p.m., as the meeting will begin promptly at 6:00 p.m. The form must be filled out completely to include an agenda item and/or a topic.

Incomplete forms will not be accepted

FY 2019 BUDGET HEARING #2

LEGISLATIVE ACTION*

The agenda is available for viewing at <https://www.boarddocs.com/ga/aps/Board.nsf>

**Action may be taken*

**An executive session may take place before, during or at the conclusion of the meeting to discuss any appropriate topics*

Please tune-in to the link below for a live stream of the board meeting

<http://livestream.com/k12aps>

Pierre Gaither
Interim Executive Administrator
Atlanta Board of Education



N2

May 29, 2018
Atlanta Public Schools Board Member Leslie Grant
Community Coffees Email Notice

Join **LESLIE GRANT**

District One Representative on the Atlanta Board of Education for

COMMUNITY COFFEES



FIRST FRIDAY & SATURDAY
of the MONTH
8:30am -10:00am



2018 SCHEDULE

FRIDAYS

BLUEPRINT CHURCH
475 Boulevard NE 30308
Rankin St Community Room

SATURDAYS

COMMUNITY GROUNDS COFFEESHOP
1297 McDonough Blvd SE 30315
Inside Carver Market

Feb 2	Aug 3
Mar 2	Sep 7
Apr 6	Oct 5
May 4	Nov 2
Jun 1	Dec 7

Feb 3	Aug 4
Mar 3	Sep 8*
Apr 7	Oct 6
May 5	Nov 3
Jun 2	Dec 8*

Special Guests • Relevant Discussions • Civic Discourse
What's on Your Mind? What's on Our Agenda?

FREE COFFEE & TREATS courtesy of MailChimp!

Sign up for reminders @ www.lesliegrantaboe1.com

