

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

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Anmarie Calgaro,

Case No. 16-CV-3919 (PAM/LIB)

Plaintiff,

**DECLARATION OF STEVE  
SALLEE IN OPPOSITION TO  
PLAINTIFF'S MOTION FOR  
SUMMARY JUDGMENT**

vs.

St. Louis County, et al.,

Defendants.

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I, Steve Sallee, declare and state as follows:

1. I am the Superintendent of Independent School District No. 2142, St. Louis County Schools (the "District"), and have been the Superintendent at all times relevant to this matter. I make this Declaration based upon personal knowledge and in opposition to Plaintiff's Motion for Summary Judgment.

2. I understand that Anmarie Calgaro ("Plaintiff") has filed a lawsuit against the District and the Cherry School's current principal in his official capacity. I have reviewed a copy of Plaintiff's Declaration, dated December 15, 2016.

3. The District covers a large geographic region in northern Minnesota, with the District Office located in Virginia, Minnesota. The District's total enrollment at the beginning of the 2016-17 school year was approximately 1,925 students. There are five schools in the District, each serving a designated geographic area. The Cherry School is a K-12 school in the District located in Iron, Minnesota.

4. The mission of the St. Louis County School District is to provide a high quality education that empowers all students to be career, college, and community ready.

5. I am the Chief Administrator of the District and I report to the School Board. Although I make decisions on day-to-day matters in the District, only the School Board has the authority to make official District policies.

6. I am aware that, on one occasion during the 2015-16 school year, Plaintiff asked the then-Principal of the Cherry School, Scott Hall, for a copy of a letter Plaintiff's child had given to the school. Mr. Hall contacted me for advice on whether he could provide the letter to Plaintiff because Plaintiff's child had requested that her mother not have access to her records. Because this situation was unusual, I contacted the District's legal counsel for advice.

7. Aside from the one-time request for one document, I am not aware of any requests Plaintiff made to the District regarding her child's educational records or educational decision-making. As Superintendent, I would have been aware of any requests of this nature, particularly since Plaintiff contends she sought review of Mr. Hall's decision regarding access to records. I supervise Mr. Hall, so if a parent thought his decision was incorrect, I would be the person to contact.

8. I have never had any communications with Plaintiff related to E.J.K.

9. Following receipt of this lawsuit, I asked all of the District Office staff whether they had received a request from Plaintiff for access to E.J.K.'s records or to participate in her educational decisions. None of the staff received any such requests.

10. I asked the District's Technology Department to conduct an e-mail search of any e-mails sent to or from Plaintiff to the District's e-mail server. The search recovered a few e-mails from Plaintiff to one of her other children at the child's school e-mail address. There were no e-mails between Plaintiff and Mr. Hall, or any other District employee, nor were any of the e-mails about E.J.K.

11. I attended all School Board meetings during the 2015-16 school year. Plaintiff did not appear before the School Board to make any requests of the District. The School Board never considered any issues related to Plaintiff or E.J.K.

12. Based on the fact that no one in the District recalls receiving a request from Plaintiff for access to E.J.K.'s records or to participate in educational decisions, as well as there being no written evidence of such a request, I have concluded that Plaintiff did not make that request. Plaintiff claims to have repeatedly made such requests, so it would be very surprising to me that no one in the District remembers receiving any such requests.

13. There was not a Principal named "Matthew Hall" at the Cherry School in November of 2015.

14. E.J.K. has not been reported as truant since she re-enrolled in the District in November 2015, and asked the District not to share information with Plaintiff.

**I declare under penalty of perjury that everything I have stated in this document is true and correct. This declaration was executed on January 3, 2017, in the County of St. Louis, State of Minnesota.**

/s/ Steve Sallee  
Steve Sallee