

SNIFFEN & SPELLMAN, P.A.

LEON COUNTY SCHOOL DISTRICT

Report of Investigation

June 2, 2023

Table of Contents

- I. Introduction and Scope**
- II. Methodology**
- III. Background**
- IV. Legal Analysis of Applicable Policies and Investigative Findings**
- V. Statement of Completion**

I. Introduction and Scope

Sniffen & Spellman, P.A. (“the Firm”) issues this Report following its investigation, initiated and conducted at the request of the Leon County School District (“District”). This investigation follows the receipt of an anonymous letter dated March 10, 2023, raising issues about alleged incidents occurring within the Chiles High School football program.

The primary issues investigated are: (1) whether during the week preceding the September 30, 2022, varsity football game against Mosley High School, players on the Chiles football team were instructed to block an opposing player in an improper and/or potentially dangerous manner; (2) whether two particular Chiles students lived out of zone while playing football for the school; (3) whether Chiles football players and other students were subjected to conduct prohibited by District policy. Findings with respect to these issues are set forth below. Notes of concern are also described where applicable based upon various issues that arose during the course of the investigation.

II. Methodology

The Firm employed standard investigative practices for this investigation. The Firm did not require or utilize any external third parties for any forensic examination, data recovery or any other reason. E-mails were secured from official School District computing resources.

The Firm conducted in-person and telephonic interviews with 38 individuals. An additional 5 potential witnesses made appointments for the conduct of their respective interviews they did not keep. All current District employees were provided a written Garrity Warning, about which each employee was provided the opportunity to ask questions. Each employee acknowledged receipt of the Garrity Warning document with which they were supplied. Individual employees

that were interviewed on more than one occasion were provided, and executed, a written Garrity Warning document prior to each separate interview.

Additionally, prior to each interview, the Firm informed the witnesses about the overall nature of this investigation and the topics about which questions would be asked. To protect the integrity of the investigation and evidence gathering by the Firm, at the conclusion of each interview, the Firm directed the interviewees to refrain from speaking or otherwise communicating about the subjects discussed in the interview until the investigation has concluded.¹ Any interviewee who requested the presence of counsel or a representative during the interview was afforded that right. District employee witnesses were provided at least forty-eight (48) hours' notice of their scheduled interview, unless waived. Student witnesses were accompanied by their respective parents or their parents gave permission to interview their child alone.

The findings contained in this Report are based on witness interviews and documents provided by the District, by witnesses, and documents and videos secured from outside sources. In weighing the evidence presented, the Firm has used a preponderance of the evidence standard. In adherence to the principles of impartiality and integrity, the Firm was directed by the District to not arrive at a predetermined outcome, but, rather, to issue findings based solely on the evidence provided by witnesses and contained in documents and videos reviewed as part of the investigation process. Finally, District representatives have made clear that no particular result or outcome is expected.

III. Background

Chiles High School is one of six public high schools in the Leon County School District. The school enrolls just over 2,000 students.²

Chiles currently offers 17 different varsity sports, along with several club sports. The Chiles football programs fields varsity and junior varsity teams. Michael Eto is currently employed as the School's Athletic Director. Kevin Pettis has been employed as a teacher, Boys Weightlifting Coach and, since 2017, as the Chiles Head Football Coach.

Chiles is a member of the Florida High School Athletics Association ("FHSAA"). The FHSAA is a not-for-profit organization designated by the Florida Legislature as the governing organization to regulate all interscholastic activities of Florida high schools.³

Chiles' varsity football team runs an offensive scheme known as the wing-t, or pistol wing-t, a run-first offensive scheme. Coach Kevin Pettis and Assistant Coach Trey Pettis teach various aspects of the offense at coaching clinics around the country. Trey Pettis serves as the offensive

¹ It has been determined through multiple witnesses that at least one interviewee, Assistant Coach Trey Pettis, failed to adhere to this directive.

² <https://www.leonschools.net/domain/1769>.

³ F.S. § 1006.20; see also, <https://fhsaa.com/sports/2020/5/11/OurPurpose.aspx>.

line coach and co-offensive coordinator. Head Coach Pettis is responsible for play-calling during varsity football games.

The following authority is relevant to the Firm's investigation:

- District Policy 2431.01 – Participation by Transfer Students (Rev. 3/28/17)
- District Policy 5112 – Student Assignment and Entrance Requirements (Last. Rev. 8/28/19)
- District Policy 5120 – School Choice (Last Rev. 1/28/20)
- District Policy 5610.05 – Extra-Curricular Student Activities (Last Rev. 7/24/18)
- District Policy 3210 – Standards of Ethical Conduct
- Student Activities Handbook – Leon County Schools (2022-2023 school year)
- Leon County School Zone Lookup Website
- Principles of Professional Conduct for the Education Profession in Florida, Rule 6A-10.081, Florida Administrative Code.
- FHSAA Handbook – Article 9 - Student Eligibility (Last Rev. 12/13/22)
- NFHS Football Rulebook

IV. Legal Analysis of Applicable Policies and Investigative Findings

A. Issue 1 - Mosley Game Preparation and Block

We have investigated whether, in the lead up to the 2022 Chiles v. Mosley football game, Chiles offensive players were instructed to improperly block a player from the opposing team and/or in a way that was potentially dangerous. The allegation stems from an anonymous letter submitted to the FHSAA, the Florida Department of Education and the District Superintendent. The letter is dated March 10, 2023, and reads, in pertinent part:

What is a very concerning issue is that apparently Mr. Pettis told a CHS football player to purposefully injure a play on the opposing team. We understand the player to be named "Student 10" that Mr. Pettis solicited to injure another. If this is true, it is beyond concern as a parent to hear this.

Chiles Athletics Director, Mike Eto, initially reviewed this allegation. Mr. Eto collected statements from four student athletes on the football team related to the allegation. The statements read as follows⁴, the first from a tight end on the team, Student 11:

In the entire week leading up to the Mosley vs. Chiles football game I was told by the head coach, Kevin Pettis and the offensive line coach, Trey Pettis, to intentionally hurt/injure a player on Mosley's defense. This player was a linebacker and I believe he was committed to a division 1 school for football. What they wanted me to do was run up to the player and dive at his knees, the coaches used the phrase "Pete Rose" to describe what they wanted me to do. I was told his countless times

⁴ Errors in grammar, spelling or syntax contained in the statements have not been corrected in the quoted sections. The names of students have been given a numerical designation, as is done throughout this Report.

between a meeting at the beginning of that week and everyday at practice, when I finally told them I wouldn't do it they tried to make me feel bad about it. To go into more depth, what they wanted me to do exactly was run to the linebacker, leaving the box, "trenches" and dive at his knees to hurt or injure this player and take him out of the game.

The second was from another tight end on the team, Student 12:

In the practices before the Mosley game, "Student 11" and I were told to "Pete Rose" block a linebacker [#6] in the first couple plays of the game. Coach Kp⁵ told us this and coach Mabry only told us what a "Pete Rose" block was; instead of blocking high, block low. Coach Kp said to do this 1 or 2 times and "to see how much he loved playing football." In the Mosley game, "Student 11" and I never did this, and it was not mentioned throughout the game. We were never instructed to intentionally hurt [#6], only to block low, to scare him from blitzing.

The remaining two were from players that did not play tight end. Student 10 related the following:

We were watching film of the Mosley defense and Kp told the tight ends, which included 3 players, to hit the best player in the knees. He said to them "see how much he likes playing football."

The final player that provided a statement was Student 13, who wrote:

Our blocking schemes for the week of Mosley were nothing out of the ordinary for preparing to play the opponent. Our schemes are obviously adjusted week by week to help our winning chances, but nothing in our program is done intentionally to target one player in an unsportsmanship way and I never heard any talk of "intentionally targeting" anyone throughout the week.

Mr. Eto also collected statements from Head Coach Pettis and assistant Coach Pete Mabry. Coach Pettis responded:

I have never solicited or asked a kid to do anything that would garner a 15 yard penalty, much less hurt a kid. The week of the Mosley game, we had to move our TE Student 14 to FB because of an injury. We had two sophomores who backed up Student 14. Student 11 and Student 12. Mosley had a 4 start MLB [#6]. The loved to blitz and I told them if he walked up to the inside gap to Pete Rose him, which is a cut block and it is in the free block zone and very legal. The kids mother called Coach Pete Mabry and said that Student 11 came home crying because Coach

⁵ "KP" is a nickname used by players, coaches and parents when referring to Head Coach Pettis.

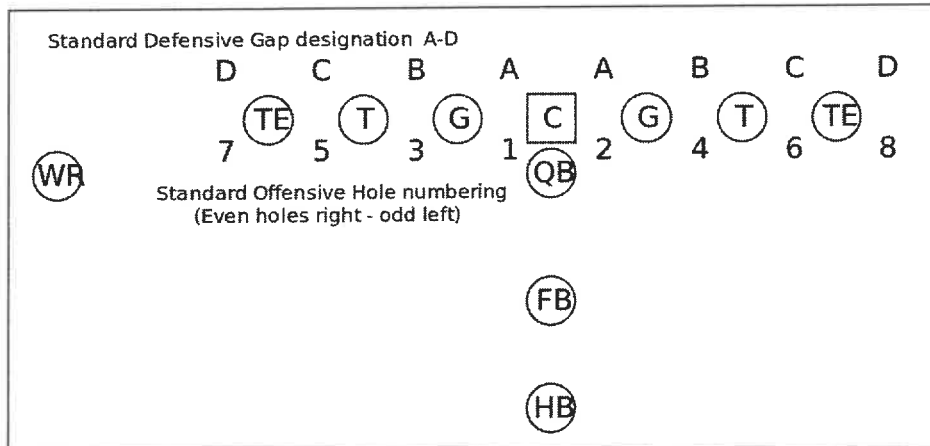
Pettis told Student 11 to intentionally hurt someone. Pete told her that its not how it happened and told her how it was presented. Coach Mabry told me he had taken care of it and I didn't feel that I need to follow up on it.

Coach Mabry, a defensive coach on the Chiles football team referenced in Head Coach Pettis's statement, indicated the following:

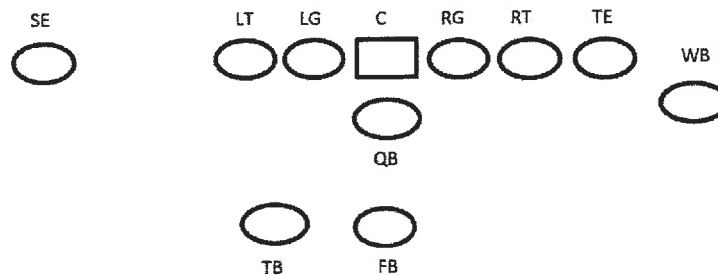
These events that you're speaking of leading up to the Mosley game Occurred in this order. There was an injury to our tail back our starting tight end was moved to full back where we were starting to young tight ends to fill in. The linebacker from Mosley was a four star player. Probably one of the best on their team. He would blitz often from the edge from the inside, etc.. These tight ends were told as we have done in the past to cut or/Superman block the linebacker when he walked up to the line, which is a totally legal block as it is at the line of scrimmage, there is no reference to injury or injuring another player whatsoever if the child in question took it that way that was his own interpretation and did not convey that to any of his coaches. Using the superman block was a strategy to even the playing field as they were such young players, and it is an easier block for them. My son, Student 14, who was the starting tight end that was moved to full back has used that strategy in previous years. I will tell you I know the family involved really well and have coached one of their sons. For at least the past 11 years we have vacationed together we have had dinner at each other's homes and our sons are best friends. The mother in this situation Has a vendetta against this coaching staff because she feels that her kids should have started over other players at certain positions and has verbally portrayed that to me. Personally we have actually discussed this situation in person while we were on vacation over Christmas break and she was told exactly what I am telling you now if you need anything further from me please let me know. Thank you.

The Firm spoke with numerous Chiles players and coaches concerning the allegations. By way of background, heading into the Mosley game, Chiles was winless. Mosley had a winning record to that point in the season and the teams are in the same district. There was a highly regarded player on the Mosley team that wore #6. This player played both tight end and linebacker.

Witnesses indicated that #6, a linebacker, would, at times, walk up to the line of scrimmage to blitz. Head Coach Pettis also indicated that #6 would blitz from the "C" gap. The "C" gap is between the tackle and the tight end, as demonstrated below:



The wing-t formation run by Chiles under Head Coach Pettis typically includes two running backs, a tackle and a guard on each side of the center, and at least one tight end on the field. Below is a common wing-t type formation:



According to Assistant Coach Pettis, who serves as the offensive line coach, Chiles' offense runs a tackle and guard on each side of the center, while a tight end on the field would line up next to the tackle. Also, according to Assistant Coach Pettis, the splits on the line - meaning the spacing between linemen - are a yard shoulder to shoulder.

Both students who played tight end during the Mosely game were interviewed as a part of this investigation. Both tight ends were sophomores during the 2022 season and were slated to play a larger role in the Mosley game due to an injury to another player. These students provided statements to Mr. Eto and provided similar information during the course of this investigation.

Student 11, indicated that coaches instructed him to shoot out from the line of scrimmage, look for #6 while #6 was reading the play and block #6 low. Student 11 indicated that the tight ends practiced a low block off the line of scrimmage by lining up a tackling dummy approximately five (5) yards away and directed the tight ends to shoot out from their stance, move toward the tackling dummy and block the tackling dummy below the numbers contained on this practice device. While practicing this block in this manner, the tight ends were told to go as low as they could when striking the tackling dummy. This student also indicated that during film review session Head Coach Pettis indicated that the tight ends should "Pete Rose" block #6 and that he

should be “taken out of the game” or that he (Head Coach Pettis) wanted #6 “out of the game.” Student 11 indicated that the block was demonstrated at practice and the block was shown to be slightly above the kneecap, but below the thigh pad. Student 11 related that he refused to perform the block during practice.

The Firm’s research indicates that low blocks are not prohibited in all circumstances by the applicable rules -- the National Federation of State High School Associations (“NFHS”) rules. Generally, low blocks, or blocks below the waist, are permitted in certain circumstances, one of which is when the block is performed inside the tackle box or free blocking zone. These blocks are often referred to as “cut blocks.” This type of block is different from “chop blocks” where one offensive player blocks a defender above the waist, while another offensive player blocks a player below the waist. This is also different from “clipping” which is a block below the waist from behind the defender.

Several other players corroborated portions of what Student 11 described relative to the block on #6. No player corroborated that the tight ends were told to go out and meet #6 away from the line of scrimmage and then cut block him. Rather, other Chiles student athletes and coaches indicated that the block was to be carried out at the line of scrimmage when #6 approached the line of scrimmage and lined up to blitz. At least one player on the football team – namely, the other tight end, Student 12 - indicated that this low block was to be executed a few times early in the game to make #6 hesitate or think twice before blitzing. One player, Student 8, indicated that the block was practiced on him, but at the line of scrimmage.

The players interviewed as part of the investigation indicated that the instruction from Head Coach Pettis and Assistant Coach Pettis was to block right above the kneecap, at the knees, or between the thigh pad and the knee. On the other hand, the coaches interviewed by the Firm indicated that players are instructed to block at the waist with a forearm on the thigh pad.

Several players corroborated, and Coach Pettis confirmed, that he referred to “Pete Rose” when referencing the blocks that were to be carried out on #6. Head Coach Pettis indicated that he referenced Pete Rose to indicate or to explain to players that they should not stand up out of their pre-snap stance before lowering themselves when performing the block, meaning that the first movement from the snap should be down to block.

Recollections about what else was said by Head Coach Pettis varied. Several individuals noted that Head Coach Pettis said blocking #6 low as instructed would demonstrate how much #6 liked playing football. Some players related that Head Coach Pettis, when referring to #6, used the phrases “take him out of the game”, “take that fucker out of the game” and “take the fucker’s knees out.” Head Coach Pettis denied he made such a comment either on the practice field or in film review sessions. No coach interviewed indicated that Head Coach Pettis made such statements.

Two players, a tight end, Student 11, and a defensive line player, Student 8, interpreted Head Coach Pettis’s remarks to mean that he wanted #6 injured. One offensive line player we interviewed, Student 6, that referenced and corroborated the comments reported to have been made by Head Coach Pettis concerning “taking him out of the game” when referring to #6, interpreted

this comment to mean that Head Coach Pettis wanted the players to neutralize or make #6 a non-factor in the game.

Prior to the Mosley game, one of the tight ends, Student 11, approached Assistant Coach John Hernandez, the quarterbacks coach on the team to explain his concern about the block on #6. Coach Hernandez acknowledged that this conversation occurred. Coach Hernandez recalled telling Student 11 to just hit the way he was supposed to hit and to not be hesitant in the game.

The Mosley game came and went. Based on a review of the footage from the Mosley game, no cut blocks were performed on #6 by any tight end during the game.

FINDINGS & NOTES OF CONCERN:

Based on the foregoing, the Firm is **UNABLE TO SUSTAIN** the allegation that any player on the Chiles football team was instructed to block #6 of the Mosley team in an improper or potentially dangerous manner. It could not be substantiated that players were instructed to cut block, or block below the waist, outside of the tackle box. A review of the relevant rules is pertinent to this finding.

Rule 2-17, Article 1 of the NFHS rules defines the free blocking zone. It provides:

2-17 Art. 1 – The free-blocking zone is a rectangular area extending laterally 4 yards either side of the spot of the snap and 3 yards behind each line of scrimmage. A player is in the free-blocking zone when any part of his body is in the zone at the snap.

Rule 2-17, Article 2 of the NFHS rules outlines when blocking below the waist is permitted. It provides:

2-17 Art. 2 – Blocking below the waist is permitted in the free-blocking zone when the following conditions are met:

- a. All players involved in the blocking are on the line of scrimmage and in the zone at the snap.
- b. The contact is in the zone.
- c. The block is an immediate, initial action following the snap.

No part of the NFHS rules define a cut block to have any particular location on the defender's body where it needs to be thrown to be legal. That is to say, there is no such thing as a cut block that is too low. So long as the conditions of the rule are met where a block below the waist is permitted, any block at any part below the waist is permitted, presuming it is not a block from the back, also known as clipping.

The requirement in the rule that the cut block be performed in the tackle box, with both players on the line of scrimmage, and as the first movement of a blocker, cuts down on the potential for injury to the player being blocked (here, the defensive player). Ultimately, allegations that a

cut block be thrown in a manner inconsistent with these rules could not be corroborated. Rather, it could only be corroborated that a cut block was instructed to be performed when #6 lined up on the line of scrimmage to blitz. In this scenario, even with a tight end delivering the cut block, such a block would be permissible under the rules if the block was delivered as the first movement of the tight end and the tight end was in the tackle box.

Head Coach Pettis' intent regarding the block is also difficult to discern with enough certainty to sustain a finding that he directed players to purposely injure #6. While numerous student athletes indicated that Head Coach Pettis used language such as "take him out of the game" when referring to #6 or similar language, these comments are subject to numerous reasonable interpretations. While it is reasonable for a player or players to conclude that Head Coach Pettis wished for them to literally sideline #6 for a part of the game, it is also reasonable to conclude that Head Coach Pettis - who denies using these types of phrases - simply meant that the player on Mosley should be rendered a non-factor in the game. That is, that he should be taken out of the game in a metaphorical sense. Without more, the Firm cannot find based on the foregoing that it was Head Coach Pettis' intention to instruct players to injure an opposing player.

A **NOTE OF CONCERN** attendant to this conclusion is that at least two (2) student athletes interpreted the language reported to be used by Head Coach Pettis concerning blocking #6 to mean that #6 should have been injured. It is reasonable for a student athlete who hears the type of phraseology students claim Head Coach Pettis used and who are given instruction at practice on low blocking techniques to interpret the language to mean players were being told to injure an opposing player. Accordingly, though the Firm has not sustained a finding with respect to this issue, the Firm does not find the allegation unreasonable under the circumstances.

B. Issue 2 - Whether Two Chiles Football Players Have Lived Out of Zone

The Firm has investigated whether two specific senior Chiles student-athletes lived in the Chiles High School zone during the period of time in which they played on the varsity football team. One student, Student 1, transferred to Chiles from Rickards High School after the Winter Break during his sophomore year (the 2020-2021 school year). Student 1 played for the Chiles football program during his junior and senior years (the 2021-2022 and 2022-2023 school years, respectively).

The second student, Student 2, spent his freshman year at Rickards and moved to Georgia during his sophomore year. Student 2 returned to Tallahassee and began attending Chiles around the same time as Student 1. Student 2 attended Chiles and played varsity football during his junior and senior years (the 2021-2022 and 2022-2023 school years, respectively).

On two occasions, Students 1 and 2, along with their respective mothers, were set for interviews at the District office. Despite providing assurances that they would attend their respective scheduled interviews, Students 1 and 2, and their mothers, failed to appear on the appointed dates and times. Accordingly, this Report is submitted without the input of these students and their parents.

The Firm also attempted to contact Davette Pettis (f/k/a Davette Myers), in whose name a trust is listed as the owner of one of the two properties purportedly leased by Student 2 and his family (referred to herein as the “Hemmingwood Property”). Contact was made with Head Coach’s Pettis’ attorney to schedule the interview. Counsel advised that Mrs. Pettis was not interested in sitting for an interview. The Firm also requested through Counsel copies of official bank statements and financial records establishing that the trust received \$1,500 per month as required by the lease entered into with Student 1’s father. Through Counsel, Mrs. Pettis advised by e-mail that she did business with Student 2’s mother prior to her marriage to Head Coach Pettis. Mrs. Pettis also advised that the requested records would not be provided. Mrs. Pettis is the owner of Canopy2Coast Realty, LLC.

Contact was made with Brady Squires, the owner of one of the two properties purportedly to be leased during a portion of the relevant period (referred to herein as the “Chamblee Property”). Mr. Squires sold the Chamblee Property on November 18, 2022.

A former member of the Chiles football coaching staff advised that he believes Student 1 and Student 2 did not live in the Chiles zone. While we were unable to secure it, this former coach recalls being a part of a coaches’ text chain containing text messages indicating that coaches coordinated which would volunteer to drive Students 1 and 2 for Summer workouts and practices. This individual cannot confirm that the text messages contain the locations at which Students 1 and 2 lived but is of the opinion that these students did not live in zone. Several student witnesses and parent witnesses advised that rumors persisted throughout Student 1 and 2’s tenure at Chiles that they did not live in the Chiles zone.

Several other witnesses are of the same opinion as the former Coach. One witness saw Student 1 arrive at the Chiles parking lot in the morning before school began with Coach Kevin Pettis on several occasions. The current Chiles Coaches with whom we spoke denied picking up or dropping off Students 1 and 2 at homes outside the Chiles zone and stated they did not have knowledge of where these students have lived. Coaches and parents volunteered that students other than Students 1 and 2 were given rides to their homes particularly during the summer football workout sessions to assist those students whose parents were unable to provide transportation, but none recalled taking any student outside the Chiles zone.

Head Coach Pettis denied picking up or dropping off Students 1 and 2 at their homes but advised that during Student 1’s sophomore year, he picked up Student 1 at or near the Goodwill parking lot located just south of Chiles as a convenience to the student. Head Coach Pettis indicated that students who are unable to secure parking spots at the high school park at this location, or at the nearby Publix supermarket and walk to the Chiles campus. He explained that students are not allowed to park on campus until their junior and senior years of high school. He related that he did not know Student 1 prior to Student 1’s arrival at Chiles and that he called the Rickards High School Coach after Student 1 arrived on campus to ask about Student 1. Head Coach Pettis indicated that he has no idea where Student 1 lived during Student 1’s time at Chiles. The current Rickards Head Coach does not know if Students 1 and 2 live in the Rickards or the Chiles zones.

Regarding Student 2, Head Coach Pettis advised he first learned that the student lived in the Chiles zone when Student 2’s father called and indicated Student 2’s mother had secured a

location in the zone. Head Coach Pettis never spoke with Student 2's mother and only met her for the first time after the 2022 Mosley game. Head Coach Pettis denied knowing that Student 2 rented a property owned by his wife. Head Coach Pettis indicated that he has no idea where Student 2 lived during Student 2's time at Chiles.

The Firm interviewed Kim Beaty, the Chiles Registrar during the relevant period and who currently serves in that role. Ms. Beaty indicated that presently all enrollment goes through central District offices. It previously was done at the school level. Ms. Beaty indicated that two forms of identification are required to enroll in a school. A lease may serve as a primary form of identification. Ms. Beaty indicated that she was trained to accept leases presented by parents. Ms. Beaty also advised that District policy places the consequences of submitting a false lease to gain access to a school for which one is not zoned on the parent submitting the lease.

Ms. Beaty produced enrollment documentation, made part of this investigation file, concerning both Student 1 and Student 2. Student 2's family submitted the requisite two forms of identification, what is required for school enrollment; specifically, a lease and Student 2's mother's state identification card bearing an address within the Chiles zone. Student 1's family submitted a lease, and no secondary form of address verification. According to Ms. Beaty, the failure to secure a second form of identification from Student 1's family was a simple oversight on the part of the school.

Several documents were secured as part of our investigation of this issue, including:

1. A lease agreement dated January 5, 2021, between Student 1's father and "Brady Jenkins" purporting to lease the property located at 3456 Chamblee Road, Tallahassee, Florida 32309 ("Chamblee Property"). The term of the lease is for one year, commencing January 1, 2021, and ending December 31, 2021, with a lease payment of \$1,500 per month. This lease was submitted to the Chiles' Registrar as part of Student 1's proof of residence.
2. A lease agreement executed on or about December 27, 2020, between Student 2's mother and Canopy2Coast Realty purporting to lease the property located at 2620 Hemmingwood Place, Tallahassee, Florida 32309 ("Hemmingwood Property"). The term of the lease is for one year, commencing January 2, 2021, through January 1, 2022, with a lease payment of \$1,500 per month. This lease was submitted to the Chiles' Registrar as part of Student 2's proof of residence.
3. School directory information regarding Student 1 and Student 2, and another student (Student 3) residing at the Chamblee property during the same time as Student 1.
4. The State of Florida Identification Card of Student 2's mother submitted to the Chiles Registrar as part of student 2's proof of residence, containing the address of the Hemmingwood Property.
5. Information submitted to the Chiles Registrar as part of Student 3's proof of residence at the Chamblee Property.

6. Residence information regarding Student 1 showing his residence prior to transferring to Chiles.
7. A screenshot of the Canopy2Coast Realty Facebook page.
8. Corporate information from the Florida Department of State, Division of Corporations' website regarding the ownership of Canopy2Coast Realty.
8. Property ownership information for the Chamblee Property and the Hemmingwood Property during the relevant time frame.
9. E-mail correspondence relating to enrollment and proof of residence.
10. Zillow information regarding Chamblee Property.
11. Zillow information regarding Hemmingwood Property.
12. Warranty deed contained on the Leon County Property Appraiser website reflecting the sale of the Chamblee Property by Brady Squires on November 18, 2022.
13. May 19, 2023, e-mail sent by Head Coach Pettis' Counsel.
14. E-Mail Correspondence and lease related to Student 4.
15. Voter Registration Information Regarding Student 2's Mother.

Chamblee Property

The lease signed by Student 1's father lists a "Brady Jenkins" as the lessor of the Chamblee Property. Our review of relevant information indicates that an individual by the name of "Brady Jenkins" did not own Chamblee Property as of the date the aforementioned lease was executed. Rather, the property was owned until its date of most recent sale (November 18, 2022) by Brady R. Squires. The property is a 4-bedroom 3-bathroom home, 2,355 square feet in dimension and is located in the Chiles zone. According to Zillow.com, the current fair market value for renting the property as of the date of this Report is \$2,875 per month. (See, https://www.zillow.com/homedetails/3456-Chamblee-Rd-Tallahassee-FL-32309/45591823_zpid/?utm_source=txtshare).

Mr. Squires was unequivocal that no Chiles football players have lived at the Chamblee Property during his ownership. He also related that he does not know who "Brady Jenkins" is, that he has never used the alias "Brady Jenkins" and does not know why anyone by that name would sign a lease on the Chamblee Property. Nor has he authorized anyone to enter into a lease on the Chamblee Property. Mr. Squires advised that he has never collected rental income from anyone purporting to rent the Chamblee Property.

The ownership information provided by Mr. Squires aligns with official property records relating to the Chamblee Property. Further, Mr. Squires' representation that Student 1 did not live at the Chamblee Property has been confirmed by an adult witness who was inside the Chamblee Property while Mr. Squires owned it and during the period in which the property is listed as Student 1's residence. It is unknown who signed the lease between Student 1's father and "Brady Jenkins." Based on the information collected, it is our opinion that the lease is fictitious. Moreover, notwithstanding the sale of the Chamblee Property in November 2022 to a new owner, the Chamblee Property remains Student 1's address of record in the Chiles' student information database. Thus, it is the Firm's opinion that Student 1 did not live at the Chamblee Property during his initial matriculation to Chiles or at any point during his attendance at Chiles.

Because we have no legal authority to compel the attendance of Student 1 and his parents for an interview, or to subpoena records from Student 1 and his family and have not been able to secure other records establishing Student 1's actual residence, we are unable to determine where the student actually resided during his enrollment as a Chiles student. However, Student 1 did not live at the Chamblee Property. Moreover, the lease signed by Student 1's father, submitted to Chiles as verification that he lived in the Chiles zone, is not a bona fide lease, contains false information regarding the owner of the Chamblee Property and contains a falsified signature of someone who never owned the Chamblee Property.

Hemmingwood Property

Student 2's mother and Canopy2Coast entered into a lease nine (9) days prior to the date on which Student 1's father entered into a lease with "Brady Jenkins." Like the lease signed by Student 1's father, the amount due each month pursuant to the lease signed by Student 2's mother and Canopy2Coast was \$1,500. The property is a 4-bedroom 3-bathroom home, 1,815 square feet in dimension. It is located in the Chiles zone. The fair market value for a lease on the Hemmingwood Property is, according to Zillow.com, \$2,749 per month as of the date of this Report. (See, https://www.zillow.com/homes/2620-Hemmingwood-Place,-Tallahassee,-Florida-32309_rb/58330672_zpid/).

According to Mrs. Pettis' e-mail, she was not married to Head Coach Pettis at the time the lease was signed. As explained in more detail below, the leases between the families of Student 1 and Student 2 are similar if not identical, except for the dates the leases were signed and the persons signing the documents. The same or similar instrument was used for a lease between another Chiles football player's parent and a different landlord (see below).

Public information regarding Student 2's mother's voter registration information indicates that she was registered to vote at two (2) addresses located in the Rickards High School zone and not at the Hemmingwood Property during the time in which Student 2 attended Chiles. We were unable to locate the voter registration residence information for Student 2's father.

As is the case with respect to Student 1, we have no legal authority to compel the attendance of Student 2 and his parents for an interview, to subpoena records from Student 2 and his family, to compel the attendance of the purported landlord for the Hemmingwood Property or to secure records from Canopy2Coast Realty and Mrs. Pettis. We have attempted to interview these

individuals and obtain records voluntarily, to no avail. Accordingly, we are unable to determine whether Student 2 ever lived at the Hemmingwood Property.

Further, while we have not reviewed Student 2's cumulative file, the Firm is advised that at some point after his initial enrollment at Chiles, Student 2's attendance was based on the District's school choice policy.

Common Features of Leases

As previously noted, the leases related to Student 1 and Student 2 are similar in form and in content. The monthly amount of the rent due under both leases is the same, the font and content of the paragraphs appear to be the same or similar. They were signed nine (9) days apart.

These leases are also similar to another lease entered into between another student/football player's parents and another landlord except for the parties and property involved, as well as the amount of the monthly rent payment. This lease is dated June 30, 2022, and was purportedly signed on or about July 1, 2022. This student, Student 4, was admitted for the 2022-2023 school year and enrolled in Chiles after moving to Florida. The lease was sent by e-mail from Head Coach Pettis to Student 4's father on July 14, 2022. Use of a similar lease instrument raises questions concerning the source and/or authenticity of the leases; however, as noted above, without the ability to demand the production of documents from witnesses and potential witnesses, our ability to conclusively determine whether this is the case is limited.

Knowledge of Leases

According to parent witnesses and the former School Resource Officer ("SRO") assigned to Chiles, the leases relating to Student 1 and Student 2 were brought to the attention of Chiles Athletic Director, Mike Eto, and Chiles Principal, Joe Burgess, during the 2022 football season, in late October or early November. These witnesses advised that Principal Burgess indicated that the students were grandfathered into the Chiles zone and therefore were properly enrolled.

According to Ms. Beaty the school takes the leases provided by students' families at face value. She indicated that there was nothing indicating that either lease submitted by either students' families was suspect or that suggested that they did not reside at the location on the lease.

The Firm has not secured evidence indicating that Head Coach Pettis was aware of the leases signed by the families of Student 1 and Student 2, or the residence of either student.

FINDINGS & NOTES OF CONCERN:

Based upon the foregoing, and the evidence gathered regarding this issue we are able to **PARTIALLY SUSTAIN** this issue insofar as it relates to Student 1. The single proof of residence presented by Student 1's parents to Chiles – the lease on the Chamblee Property – is not a bona fide lease, contains a falsified signature and Student 1 never resided at the Chamblee Property. A second form of identification was never obtained from Student 1's parents. In the Firm's opinion,

the submission of this lease to gain eligibility was done in violation of FHSAA Article 9.1.2.2 and Leon County School Board Policy 5112(IV)(B) (False Information).

With respect to Student 2, we are **UNABLE TO SUSTAIN** the issue of whether this student lived outside the Chiles zone. While there is information in the public record casting doubt on Student 2's mother's residence at the Hemmingwood Property and the use of the same or a similar lease was used with Student 1 and Student 4 is curious, by itself and subject to the limitations under which the Firm operated relative to its ability to compel interviews and documents, the Firm cannot sustain this issue.

We **NOTE CONCERN** regarding what appears to be the use of the same or similar lease instruments by three (3) separate landlords and three (3) separate Chiles football players' families.

C. Issue 3 – Conduct Which is Alleged to Violate District Policy

The Firm has also investigated whether one or more students associated with the Chiles football program have been subjected to behaviors which violate District policy; specifically, Leon County School Board Policy 3210.

We have evaluated the information received from witnesses with the understanding that football is a physical and emotional sport. This Report does not attempt to opine on the effectiveness of different coaching styles, which style is preferred by coaches, players or parents, or whether the use of raw or strong language is appropriate. Rather, the findings made in this section of the Report are guided only by the plain language of District policy and the evidence with which we have been provided and which has been evaluated.

1. Student 5

Student 5's allegations center on comments allegedly made by Assistant Coach Adolph Isom and Head Coach Pettis. With respect to the comments allegedly made by Coach Isom, after practice (or a game, accounts differ), Student 5's parent confronted the coach after Student 5 claimed the coach said that Student 5 would never play so long as he was coaching. This comment is alleged to have been made after Student 5 talked back to Coach Isom during practice (or the game). According to Head Coach Pettis, parents are asked to not approach coaches at practice or games, or while coaches are walking off the field, about a student's playing time. Rather, if a parent wishes to express a concern about playing time, or similar issues, the parent should make an appointment with Head Coach Pettis to discuss the concern.

Assistant Coach Isom is also alleged to have called Student 5 "worthless" and a "worthless ass." During the incident in which Student 5's parent confronted the coach as he was walking off the field, Assistant Coach Isom told the parent that he was going to speak with the parent the same way Student 5 treated the coach when he tried to speak with Student 5; namely, by putting his hands over his ears and walking away. During his interview, Assistant Coach Isom stated that he made the remark in an attempt to avoid confrontation with Student 5's parent.

We were unable to corroborate the allegation that Assistant Coach Isom referred to Student 5 as “worthless” and a “worthless ass.” Coach Isom denies making the statements.

Student 5 and family members also related an incident in which the student missed practice and was chastised by Head Coach Pettis for doing so. The family related that, according to Student 5, Head Coach Pettis is alleged to have stated to the student that he would have to explain something to the student by using markers and coloring books, to which Student 5 reacted negatively based on a disability with which he has been diagnosed. According to Student 5’s mother, Head Coach Pettis spoke with her and apologized for making the statement and indicated he was not aware Student 5 had been diagnosed with the disability. Student 5 indicated that after the incident, Head Coach Pettis found a pair of air pods in the school’s the lost and found and gave it to the student as a way to make amends. According to Head Coach Pettis, the incident in question occurred when Student 5 and a group of other students rushed up to him to obtain their pads. Head Coach Pettis denied knowing that Student 5 had a disability and does not recall ever using the word markers or crayons. Head Coach Pettis indicated that he told this group of players they were late to practice and asked if he needed to write instructions down for the group. Head Coach Pettis denies that the remark was made to Student 5 alone or that he made any comment to Student 5 related to a disability.

Most of the other allegations related to Student 5 revolve around Student 5’s playing time, which was scarce. To secure playing time for Student 5, Head Coach Pettis petitioned the FHSAA to allow Student 5 to utilize the so called “6 Quarter Rule” typically reserved for underclassmen during Student 5’s senior year.⁶ After the petition was granted, Student 5 was able to play in Chiles junior varsity football games, and on the varsity squad, though his varsity playing time was very minimal.

2. Student 6

On August 26, 2021, Assistant Coach Trey Pettis organized an offensive line event at the Golden Corral. These gatherings were established throughout the season, the evening before a game and possibly at other times to promote camaraderie among the offensive line position group. During this particular gathering, Head Coach Pettis also attended, along with Student 6, Student 7 and Student 7’s friend.

Student 6 advised that during the event, Head Coach Pettis made repeated remarks and innuendo about the age of Student 6’s then girlfriend, who was approximately two years younger than Student 6. Student 6 was a junior at the time and an offensive lineman on the team. These comments are corroborated by multiple witnesses and other evidence, and included referring to Student 6’s girlfriend as “jailbait”, stating that Student 6 was a “pedophile” for dating her, stating that Student 6 was violating the girl’s rights, stating that Student 6 was going to be put in jail for

⁶ The Rule, set forth at section 4.7.5 of the FHSAA Football Sport Manual (https://fhsaa.com/documents/2022/7/13/2223_football_website.pdf?id=3341) states that:

“A member school may apply to the FHSAA to allow student-athletes to be an “active participant” in six (6) quarters in the same school week Monday through Saturday. If the school is approved, six (6) quarters a week will equal one (1) contest for student participation. A student-athlete is considered an “active participant” in a quarter if the student enters the contest at any time.”

dating the student, telling Student 6 that the restaurant had a special menu for persons 14 and younger to eat for free and that Student 6 should bring his girlfriend to the restaurant for a free meal. These comments were embarrassing to Student 6 and, as they continued, Student 7 attempted to defend Student 6, suggesting that Head Coach Pettis stop making the comments. Head Coach Pettis responded to Student 7, discussed in more detail below.

Head Coach Pettis denied that these remarks were made. The only comment he recalls making is that “15 will get you 10 to 20,” a reference to the need for older students who are dating younger ones to stay away from conduct that may lead to arrest.

During the August/September 2021 timeframe, Student 6 attended practice even though he was sick. Student 6 was coughing throughout practice, felt tired and weak and was not performing at a high level. Multiple witnesses corroborated that Head Coach Pettis was not pleased with Student 6 during the practice and screamed “Goddamnit [Student 6] stop playing like a fucking pussy and get your shit together.” Head Coach Pettis denies making the comment.

Student 6 related that the remarks made by Head Coach Pettis in front of teammates felt embarrassing and degrading and which led to what was described as a toxic situation between coach and player. After Student 6’s father met with Head Coach Pettis about the family’s hope and expectation that Head Coach Pettis would reinforce the same leadership skills and positive behaviors that were being taught at home, and disclosing to Head Coach Pettis that Student 6 had slipped up at home with what was expected, Student 6 indicated that Head Coach Pettis made remarks to Student 6 with teammates present that Student 6 had turned to partying and chasing girls. Other witnesses have corroborated these statements. Head Coach Pettis denies making the comment.

Student 6 also explained that Head Coach Pettis made derogatory remarks about Student 6 achieving his Eagle Scout rank in front of his teammates. The comment was corroborated by several witnesses, with one recalling that Head Coach Pettis called being an Eagle Scout lame. Head Coach Pettis also referred to Student 6 as Eddie Haskell which, after Student 6 ascertained information regarding the television character, led Student 6 to believe that his coach felt he was a fraud. This comment was also corroborated by other student witnesses.

Head Coach Pettis denies making the statement about Student 6 being an Eagle Scout and stated he does not recall referencing Eddie Haskell. Assistant Coach Pettis denied Student 6 was chided about being an Eagle Scout and added that he loved the fact that Student 6 was an Eagle Scout.

Student 6 described an incident during his 6’s senior season, while in an offensive line film session, a play was shown in which an opposing player was, according to Assistant Coach Pettis, overly aggressive with the Chiles quarterback. Assistant Coach Pettis pointed out the play and asked Student 6 why he did not go after the opposing player. Student 6 responded that to retaliate against the opposing player would have led to a penalty and pointed out that the Chiles running back gained yardage on the play. It was well known that Student 6 was attempting to secure an appointment with and play football for the U.S. Coast Guard Academy. After discussing the play and his disappointment that Player 6 did not attack the opposing player, Assistant Coach Pettis

stated in front of other players that he was glad Student 6 was going into the Coast Guard, because the coach would not want to see him in the Army or Navy on the front line. According to Student 6, the other players in the room appeared shocked by the comment, which was corroborated by other witnesses. According to Assistant Coach Pettis, he never made the statement.

During the Chiles – Mosley game Student 6's senior year, the student injured his ankle during the game. After the play, Student 6 attempted to remove himself from the game and walk to the sidelines. Head Coach Pettis told him to stay on the field, that nobody else could play his position and that the team needed to win the game. At halftime, the ankle was taped and according to Student 6, he did the best he could notwithstanding the injury. Ultimately, despite being hobbled by the injury, Student 6 made the key block that allowed the Chiles running back to score the game winning touchdown.

Student 6's parents were concerned about the severity of the injury and planned to seek medical attention the next day after Student 6 attended the Saturday morning mandatory film session, which Student 6 attended on crutches. According to Student 6's father, Student 6's ankle was swollen to almost the size of a watermelon and his son could not put any weight on his foot without experiencing severe pain. During the portion of the film session when the offensive line position group watched film separate from the rest of the team, Student 6 arrived at the room in which the offensive linemen met, which was presided over by Assistant Coach Pettis. As Student 6 entered the room, his teammates and Assistant Coach Pettis were present. Assistant Coach Pettis asked why Student 6 was using crutches, to which Student 6 responded by indicating that his ankle was injured and that he was in pain. Assistant Coach Pettis told Student 6 that he did not need those "damn crutches", demanded that Student 6 place the crutches on Assistant Coach Pettis' desk and directed that he not use them. Student 6 attempted to explain that he could not put any weight on the foot of his injured ankle and could not walk. Assistant Coach Pettis told Student 6 to "get over it" and "toughen up." Student 6 complied with Assistant Coach Pettis' directive, placed the crutches on the desk and attempted to walk to a seat by leaning against the wall in the room. Assistant Coach Pettis directed Student 6 to stop leaning against the wall and "get over it." Student 6 began to cry because of the pain he was experiencing walking to the chair and reached for the door in the room, which Assistant Coach Pettis told him to stop holding on to. Assistant Coach Pettis told Student 6 that he needed to "get over it," told Student 6 that he needed to "toughen up", and told Student 6 that he was "a pussy." These statements were corroborated by witnesses. Assistant Coach Pettis denied the incident occurred as alleged.

While the film was shown, Assistant Coach Pettis became critical of which foot Student 6 led with during blocks and downgraded Student 6's blocking grade because of his technique during the game. This upset Student 6, who took pride in his technique, because he played through a painful injury and was doing all he could to make blocks with an injured ankle.

Student 6's father drove Student 6 to and from the Saturday morning practice because Student 6 was unable to drive because of the injury. As he pulled into the parking lot to pick Student 6 up after practice, he noticed that Student 6 was hopping on one foot as he approached the vehicle. After Student 6 got into the vehicle, Student 6's father asked what happened to the crutches Student 6 brought with him to practice. Student 6's father advised that Student 6 told him

that Assistant Coach Pettis took the crutches from him and told Student 6 the crutches were unnecessary.

The following Monday, Head Coach Pettis asked Student 6 about the injury and how Student 6 was feeling. Student 6 advised that it was feeling better but that he was still experiencing pain and finding it difficult to put weight on his foot. Head Coach Pettis acknowledged that Student 6 was in pain and told him to dress out for practice but to not actively participate so that he did not further injure his ankle. As practice moved forward, the offensive line group gathered for drills, including blocking a training device (called a "Low Boy"). Student 6 walked alongside his teammates as they performed the drill. Assistant Coach Pettis directed Student 6 to block the device, to which Student 6 responded by indicating his ankle was still painful and that he did not want to injure it further. Assistant Coach Pettis told Student 6 that he needed to "toughen up" and referred to him as a "little boy." Student 6 complied with Assistant Coach Pettis' demand and, as he began to block the practice device, fell to the ground screaming in pain. When he looked up, Student 6 recalled seeing Head Coach Pettis moving quickly to the site where the drill was taking place, demanding to know what happened. Assistant Coach Pettis explained what happened. Head Coach Pettis began to scream at Assistant Coach Pettis for what happened and told him Student 6 was not required to actively participate in practice for the remainder of the week. Student 6's description of the events at this practice was corroborated by several witnesses.

Assistant Coach Pettis denies that he forced Student 6 to perform the drill. Head Coach Pettis does not recall the incident but noted that an assistant coach would only make a player do something Head Coach Pettis did not want that player to do if the assistant coach did not know that Head Coach Pettis did not want the player doing it.

While Student 6 played on the Chiles varsity football team, to diversify his resume in support of his desire to attend a military academy after high school, and simply to try something new, Student 6 noted that he took up playing lacrosse in the spring and enjoyed a great deal of success. Student 6 described the Chiles lacrosse culture as enjoyable. According to Student 6, on numerous occasions, Head Coach Pettis remarked to Student 6 during weightlifting class that Student 6 was losing too much weight and becoming weak. Student 6 told Head Coach Pettis that playing lacrosse involved a lot of running and was physical, which was no doubt impacting his performance in the weight room. Student 6 advised that Head Coach Pettis made several remarks about the student's participation in lacrosse, indicating that he was doubtful of Student 6's commitment to football. Student 6 also indicated that to achieve an A grade in the football weightlifting class, a player was required to increase the amount he lifted by 15 pounds in all areas during various intervals of the semester. Student 6 was finding it difficult to meet this requirement. During one class, in front of other teammates who were in the class, Head Coach Pettis told Player 6 that he was going to call the Coast Guard Academy and tell them that Student 6 was not committed. This comment was corroborated.

According to Head Coach Pettis, the context of these discussions related to his concern that if Student 6 wanted to play football for the U.S. Coast Guard Academy, Student 6 would need to make a commitment to his weight and strength. While he denies that he threatened to call the Academy, Head Coach Pettis stated that he advised Student 6 that he needed to be more committed than he had ever been if he was going to make it. Head Coach Pettis also related that he was

concerned that Student 6's loss of weight and strength would impact Student 6's commitment to the Chiles weightlifting team, of which Student 6 was a member.

Notwithstanding the aforementioned incidents, Student 6 acknowledges that Head Coach Pettis made him a better football player. Toward the end of his junior year, after Student 6's father met with Head Coach Pettis about comments made concerning Student 6's alleged lack of commitment, Student 6 told Head Coach Pettis he did not appear to understand Student 6 and hoped to have the same relationship with the coach that he had with a former Chiles player. The two decided to have a weekly meeting to talk about various issues. While Student 6 appreciated Head Coach Pettis' initial willingness to conduct the meetings, they fell by the wayside because the coach would arrive late, not arrive at all or would do other work rather than focusing on the discussion with Student 6. Head Coach Pettis acknowledged that the meetings did not always go off as planned because of various commitments, including dates on which Student 6 did not attend.

3. Student 7

Student 7 was closely involved with the Chiles football program for two (2) years – the 2020-2021 school year and the 2021-22 school year. During that time, she overheard Head Coach Pettis call players “pussies” and “fucking pussies” on several occasions, words that have been corroborated by several Chiles players, at least one parent and another student who was near the Chiles football field.

Student 7 related that she helped organize the student football assistant program prior to commencement of the 2020 season. After securing and training several volunteers to assist with these responsibilities, Student 7 advised Head Coach Pettis that she would be absent for two weeks while she tried out for another sport, to which Head Coach Pettis consented. While Student 7 was away, several mishaps occurred; namely, some of the water girls spilled chalk on the field house floor and erased one of the plays on a whiteboard. Student 7 acknowledged that the students who carried out the water girl responsibilities in her absence did not perform their roles as Student 7 had hoped.

When Student 7 returned after her approximately two-week absence, she reengaged her responsibilities. Student 7 advised that, at practice, Head Coach Pettis fired her for what had transpired with the water girls while she was absent, yelled at her and told her she was being fired because she “can't get your shit together.” Student 7 indicated that she began to cry after this interaction, which Assistant Coach Mabry noticed. Student 7 related that Assistant Coach Mabry talked to Head Coach Pettis about the interaction, after which she was “rehired” to her water girl position for which she was grateful to Assistant Coach Mabry.

Before the start of the 2021 football season, Student 7 accompanied the offensive line position group during the aforementioned August 26, 2021, offensive line outing at Golden Corral, also attended by Head Coach Pettis. Student 7 witnessed the interaction between Student 6 and Head Coach Pettis relative to Student 6's then girlfriend. Student 7 texted her mother during the event, summarizing what was occurring. At some point in the evening, after Head Coach Pettis made one of several remarks about Student 6's girlfriend, Student 7 indicated that she injected herself into the discussion and told Head Coach Pettis to stop making fun of Student 6. Student 7

related that Head Coach Pettis looked at her and responded by saying “[Student 7] you can’t be talking because you have slept with the whole football team.” Student 7 indicated that members of the team who were present became quiet after the remark was made. Student 7 responded to Head Coach Pettis by stating “If that’s what you think, but it’s not true.” The statements related by Student 7 are corroborated.

Head Coach Pettis left the event early, but when it was over, Student 7 walked with Student 6 and, in the Golden Corral parking lot, was stopped by Assistant Coach Pettis. According to Student 7, Assistant Coach Pettis apologized to her for what had happened in the restaurant, told her that “KP loves you” and to “not take it too seriously.” While Student 6 and Student 7 drove away, Student 6 told Student 7 that he was tired of Head Coach Pettis making remarks about his personal life, and that his personal life was none of Head Coach Pettis’ business.

Head Coach Pettis denies the exchange described by Student 7 and indicated he stopped in briefly to the event but left soon thereafter. Assistant Coach Pettis denies the exchange occurred as well, and also denies speaking with Student 7 in the parking lot after the event concluded.

According to Student 7, after the incident at the Golden Corral, football players who were present at the event and other players have teased her with false accusations about sleeping with multiple football players, have called her a “whore” and told her that she “sleeps with her brother”, which has upset her.

Student 7 also related an incident occurring after a junior varsity away game versus Wakulla High School. During the game, the device used by players to drink water (called a “water cow”) was not working as it should. The junior varsity team, varsity and junior varsity coaches and student assistants returned to the Chiles field house after the game. Student 7 and another student were the only two assistants who worked the game that evening. The remaining assistants did not attend as scheduled. At the field house, Student 7 and the other student assistant cleaned the Chiles locker room, cleaned the team jerseys and set up the water cow to be recharged. Student 7 related that when she and the other student were finished with their tasks, she walked up to Head Coach Pettis’ office, which has a large window and a seating area for multiple people. Student 7 knocked on the door to tell Head Coach Pettis that she was leaving and asked him to look at the water cow since it had not been working effectively. According to Student 7, Head Coach Pettis opened the door and led her inside his office, in which several other coaches were seated. Student 7 indicated that Head Coach Pettis began to berate her about the manner in which the water cow functioned during the junior varsity game that evening, yelled “you’re the fucking reason everything breaks” and “everything fucking breaks because of you.” Student 7 also advised that Head Coach Pettis told her she was “a piece of shit” and “should just quit.” The exchange between Student 7 and Head Coach Pettis has been corroborated.

Student 7 indicated that she began to cry and walked away from the Chiles field house. Student 7 stayed the night with a friend, because it was close to midnight on a school night and the mother of the friend who was with her at the field house was waiting in the parking lot. However, Student 7 sent text messages to her mother about how she felt she was treated by Head Coach Pettis along with a picture of her crying. Student 7’s mother was upset about what her daughter told her.

Because of the above-described incidents, and because she felt that involving herself in other activities was a better use of her time, Student 7 fulfilled her commitment to the Chiles football team for the remainder of the 2021 season, and, thereafter, removed herself as a student volunteer for the remainder of her time at Chiles.

Head Coach Pettis denies going back to the Chiles field house at all after the Wakulla junior varsity game. One adult and two student witnesses with whom we spoke indicated that Head Coach Pettis was present at the field house on the evening in question. The adult witness advised that Head Coach Pettis yelled at several coaches about the game, in addition to the exchange with Student 7.

4. Student 8

Student 8 related that Head Coach Pettis has called him a “pussy”, which has been corroborated. The corroborating witness indicated Head Coach Pettis called Student 8 by this word during the 2022 season. Head Coach Pettis denies ever calling players by that word.

5. Student 9

Student 9 related in multiple interviews conducted toward the end of our investigation that Head Coach Pettis made remarks referring to his national origin. Head Coach Pettis denies the allegation outright.

According to Student 9 two (2) of the statements were made without witnesses being in a position to hear them. One statement, which Student 9 indicated was done in a joking manner, involved referring to Student 9 as a “rice-eater.” Another statement involved Head Coach Pettis referring to Student 9 as “ching chong.” Because Student 9 has indicated that no other student could have heard these alleged statements, we have been unable to corroborate them.

The final statement related by Student 9 is alleged to have occurred in front of at least one other student and involved Head Coach Pettis stating to Student 9 that he drives a Honda, followed by a martial arts type noise. Student 9 advised that Student 15 might have heard the comment. We spoke with Student 15 and Student 15’s father about the allegation that Head Coach Pettis making comments about Student 9’s national origin. While Student 15 and his father could not specifically corroborate the statement regarding Student 9 driving a Honda, Student 15 acknowledged that Head Coach Pettis did make jokes, including one that referred to a “Chinese plank” the players were performing, but Student 15 did not take offense to it.

Student 9 also related a story in which Student 9 had the flu and was out of practice for approximately five (5) days. According to Student 9, when he returned from the illness, Head Coach Pettis cursed at him for five (5) minutes before practice and told him “turn your shit in.” We have been unable to corroborate this interaction.

Student 9 corroborated that he has heard Head Coach Pettis and Assistant Coach Pettis call players “pussies.” He stated that he would hear them say it aloud, under their breath and to one

another. Student 9 indicated that after the “snapchat event” in which Assistant Coach Pettis was alleged to have used a slur about another student, Head Coach Pettis swore less overall, but still did so. Student 9 indicated that Assistant Coach Pettis’ use of curse words was consistent and did not change after the snapchat incident.

Student 9 also related that players were cussed out by Head Coach Pettis on a regular basis, including him. He described being cussed out as degrading.

6. Additional Information Provided During Interviews

Throughout the interview process, several themes emerged. First, there is no question that several of the student-athletes and parents with whom we spoke expressed genuine feelings of affection toward Head Coach Pettis, Assistant Coach Pettis and other members of the Chiles football coaching staff. Moreover, the Firm received a handful of e-mails from members of the Chiles community expressing their admiration and support of Head Coach Pettis.

The Firm’s role in this investigation was not to determine whether Head Coach Pettis is more popular than not or more supported than not. And while there were witnesses supportive of Head Coach Pettis, there were also witnesses who were not, and still others who, though fond of Head Coach Pettis in some respects, conceded that issues and incidents of concern have occurred. In the final analysis, the Firm’s role was to evaluate the information with which it was provided and determine whether there is credible, supported evidence demonstrating whether policy violations have occurred.

FINDINGS & NOTES OF CONCERN:

Based upon the foregoing, we are **UNABLE TO SUSTAIN** that Assistant Coach Isom has violated School Board Policy 3210, with respect to the above-described interactions with Student 5.

Based upon the foregoing, we are **UNABLE TO SUSTAIN** that Head Coach Pettis has violated School Board Policy 3210, with respect to the above-described interactions with Student 5.

Based upon the foregoing, we **SUSTAIN** that Head Coach Pettis has violated School Board Policy 3210. We make this finding only with respect to those comments and/or actions related to Students 6, 7 and 8, which have been corroborated.

The Firm reached these conclusions based on the details of the individual witness statements and interviews as well as the totality of all of the information and evidence it has obtained and reviewed over the course of this investigation. While these conclusions on some level involved the assessment of the credibility of witnesses who provided accounts of the matters at issue, the Firm concludes that preponderance of the evidence supports the conclusions reached. The findings herein are based on, among other things, numerous corroborating witness statements which are consistent in substance and in detail. Independent documentary evidence supports certain of these incidents. While the Firm notes that these allegations have been met with either

blanket or partial denials, these denials are not convincing in light of the volume of the allegations made, by different individuals, regarding multiple incidents occurring over an extended period of time and which, as noted, are corroborated. The conclusions reached herein are based on an assessment of the totality of this evidence, and the demeanor of the witnesses during the witness interviews. The witness statements and corroborating witness statements do not appear unreasonable, impossible, or unlikely.

Based upon the foregoing, we **NOTE CONCERN** regarding the corroborated statements and actions of Assistant Coach Pettis relative to Student 6 in light of the requirements of School Board Policy 3210.

V. Statement of Completion

This investigation has been completed by the undersigned firm and all material information and evidence discovered in the course of the investigation has been reviewed and considered in setting forth the findings contained in this report.

/s/ Robert J. Sniffen
/s/ Jeffrey D. Slanker
Sniffen & Spellman, P.A.
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June 2, 2023