

The District has committed to the community that it will be transparent with regard to the Investigation Report, to the extent permitted by law. The District, as any school district in Texas, is obligated under the Texas Public Information Act and Chapter 21 of the Texas Education Code to redact information protected from public disclosure including:

* Witness information in compliance with Tex. Gov't. Code 552.135.

* Evaluative information, confidential information, information confidential under state and/or federal statutes, information confidential under common law, information confidential under constitutional privacy, informer's privilege, and information protected from public disclosure in compliance with Tex. Gov't. Code 552.101 and Tex. Educ. Code § 21.355.

As stated by the Texas Supreme Court, then Justice Greg Abbott, in *In Re City of Georgetown*, 53 S.W.3d 328 (Tex. 2001):

"In contrast to information subject to the work-product and consulting-expert privileges, which is not expressly made confidential by any law, numerous types of information are 'expressly made confidential under other law.' For example, . . . Section 21.355 of the Texas Education Code provides that '[a] document evaluating the performance of a teacher or administrator is confidential.' TEX. EDUC. CODE § 21.355 . . . This is just a small sample of the many examples – too numerous to list – in which the Legislature has made information expressly confidential. These confidentiality provisions generally protect third parties' privacy, not that of party litigants. And, in contrast to privileges, governmental compliance with confidentiality laws is mandatory, and their protections may not be waived by governmental entities."

Dr. Tom Maglisceau waived his right to have his name and identifying information withheld, to the extent feasible.

In full compliance with the pending TEA Special Investigation and applicable state laws and regulations, the District is providing a copy of the Investigation Report and Supplements to TEA with only redactions in compliance with the Family Education Rights and Privacy Act and without the redactions noted above. TEA also treats this information as confidential, as cited above.

However, in an effort to obtain a ruling in an expedited fashion, the District will submit the Investigation Report and Supplement to the Texas Attorney General's Office for a decision regarding the application of the cited protections.

PRIVILEGED & CONFIDENTIAL
INVESTIGATION REPORT
Celina Independent School District

Date of Report: December 31, 2025

Investigation Conducted by
Giana Ortiz, The Ortiz Law Firm

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REFERENCES

Throughout this Report, the following meanings may be attributed to the below-indicated terms:

Athletics	CISD Athletics Department
Board	CISD Board of Trustees
CHS	Celina High School
CISD	Celina Independent School District
CPD	Celina Police Department
District	CISD
Doe I	<i>Doe I - XII v. CISD and C. Elliott</i> , No. 471-08453-2025 (orig. filed 10-21-25)
Investigation	The investigatory process underlying this Report
Investigator	Giana Ortiz, Investigator and Author of the Report
Johnny Does I	<i>Johnny Does I-II v. CISD and C. Elliott</i> , No. 471-09339-2025 (orig. filed 11-25-25)
Johnny Does II	<i>Johnny Does I-XVI1 v. CISD and C. Elliott</i> , No. 471-_____2025 (orig. filed 12-3-25)
MMS	Moore Middle School
Report	This Investigation Report
Roe I	<i>Roe 1-3 v. CISD et. al.</i> , No. 471-08602-2025 (orig. filed 10-27-25)
SBEC	State Board of Educator Certification
TEA	Texas Education Agency
TEA Investigation	The investigation underlying TEA's November 3, 2025 Notice of Investigation

EXHIBITS TO REPORT

The exhibits accompanying this Report are organized into multiple volumes and include the Investigator's memoranda of interview for each witness, as well as memoranda reflecting follow-up communications with several witnesses. In most instances, a memorandum of interview was provided to the witness prior to finalization to allow the witness an opportunity to review and confirm that the memorandum reflected a fair and accurate summary of the conversation. Where a witness provided changes or revisions, the revised memorandum is included in the exhibits exactly as sent to the Investigator by the witness. The exhibit volumes also contain documents provided by individual witnesses and/or the District during the Investigation. Most exhibit volumes are bookmarked and consecutively paginated. Citations in this Report to the exhibits are by volume number and page number within the volume.

Volume	Description
Volume 1	Documentation Related to Caleb Elliott
Volume 2	Memorandum of Interview & Documentation Related to Allison Ginn
Volume 3	Memorandum of Interview & Documentation Related to Bill Elliott
Volume 4	Memorandum of Interview & Documentation Related to Witness ^{TGC 552.101 / TEC 21.355}
Volume 5	Memorandum of Interviews & Documentation Related to Other Witnesses
Volume 6	Abuse Training Documentation
Volume 7	Other Documents & Policy
Volume 8	Allegations Regarding Caleb Elliott (TEA & Petitions filed in Collin County District Court)

WITNESSES INTERVIEWED

Witness Name	Description	Memorandum of Interview
Witness 1	CISD	Vol. 5 p. 1
Witness 2		Vol. 5 p. 6
Witness 3		Vol. 5 p. 11
Witness 4		Vol. 5 p. 16
Witness 5		Vol. 5 p. 19
Witness 6		Vol. 5 p. 23 & 220
Witness 7		Vol. 5 p. 37
Witness 8		Vol. 5 p. 43
Elliott, Bill	CISD Athletic Director & parent of Caleb Elliott	Vol. 3
Witness 9		Vol. 4
Ginn, Allison	MMS Principal & parent of CISD student	Vol. 2 & Vol. 5 p. 221
Witness 10		Vol. 5 p. 51
Witness 11		Vol. 5 p. 56
Witness 12		Vol. 5 p. 61 & 224
Witness 13		Vol. 5 p. 68
Witness 14		Vol. 5 p. 75 & 220
Witness 15	CISD	Vol. 5 p. 83
Witness 16		Vol. 5 p. 90
Witness 17		Vol. 5 p. 94
Maglisceau, Tom	CISD Superintendent	Vol. 5 p. 97
Witness 19		Vol. 5 p. 113
Witness 20		Vol. 5 p. 119

¹ Witnesses were not specifically questioned about their own personal children. However, this information did come up in several witness interviews in discussing the matters investigated. Thus, if this list does not indicate children in the District (currently or formerly), it does not necessarily mean that the witness does not (or did not) have a child of their own attending CISD schools.

Witness 21		Vol. 5 p. 123
Witness 22		Vol. 5 p. 127
Witness 23		Vol. 5 p. 136
Witness 24		Vol. 5 p. 141
Witness 25		Vol. 5 p. 145
Witness 26		Vol. 5 p. 194
Witness 27		Vol. 5 p. 151
Witness	CISD	Vol. 5 p. 156
Witness 29		Vol. 5 p. 159
Witness 30	CISD	Vol. 5 p. 162 & 224
Witness 31		Vol. 5 p. 177
Witness 32	CISD	Vol. 5 p. 181 & 223
Witness 33		Vol. 5 p. 185 & 224
Witness 34		Vol. 5 p. 196 & 223
Witness 35		Vol. 5 p. 203
Witness 36		Vol. 5 p. 208 & 220
Witness 37		Vol. 5 p. 213

INTRODUCTION

Regrettably, the purpose of this Investigation is not to uncover or highlight the wonderful aspects of Celina ISD—of which there appear to be many. Most witnesses expressed sincere pride in the town and the school district.

That said, the District has requested an independent, third-party investigation into District hiring practices, job responsibilities, District operations, and other personnel and/or operational questions related to MMS teacher/coach, Caleb Elliott's arrest on October 3, 2025. The scope of the investigation includes, but is not limited to, determining if/when claims were made regarding Caleb Elliott before October 3, 2025, the District's response to those claims, identifying individuals involved in decision-making regarding Caleb Elliott's employment, and identifying any systemic issues that may exist at MMS and in Athletics. During the pendency of the Investigation, Caleb Elliott was re-arrested and lawsuits were filed against the District arising from alleged actions of Caleb Elliott and others. The District requested that the allegations raised in the lawsuits be incorporated into the investigation, excluding criminal issues against Caleb Elliott reviewed by the CPD. Caleb Elliott has resigned, surrendered his teaching certification, and is no longer subject to potential disciplinary action by the District.

Over the course of several weeks, I interviewed 39 witnesses and reviewed hundreds of pages of information collected from witnesses and my own independent fact gathering. All of that informs the Findings, Conclusions, and Recommendations in this Report.

NOTE ABOUT RETALIATION

Many of the witnesses report directly or indirectly to Bill Elliott, Allison Ginn, or both, and a number are at-will employees with limited job protection. Multiple witnesses did express concern about their statements being shared with others. In light of these reporting relationships and employment circumstances, the Investigator respectfully requests that the District maintain the identities of participating witnesses as confidential to the extent possible and take all appropriate steps to ensure that no witness is subjected to retaliation for participating in or cooperating with this Investigation.

SUMMARY OF ISSUES

Except as described herein, this internal personnel investigation does not address criminal allegations and/or conduct of Caleb Elliott—who has resigned, surrendered his teaching certification, and is no longer subject to potential disciplinary action by the District. The Investigation is focused on allegations which could or would constitute violations of policy, regulation, and/or civil school laws of the state by District employees other than Caleb Elliott, as broadly defined below:

- Relationship with a CHS student:
 - Knowledge of an “improper relationship with a then-senior of the high school” and Caleb Elliott while Caleb was substitute teaching during the 2022-23 school year. (See Ex. Vol. 8 (TEA Special Investigation Notice Allegation 1, Doe Petition ¶ 27, Roe Petition ¶ 26, Johnny Does I Petition ¶ 18, Johnny Does II Petition ¶ 30).)
 - Knowledge of or involvement in moving Caleb Elliott to (or hiring him for) MMS in the summer of 2023 as an eighth-grade coach and sixth-grade social studies teacher instead of terminating him upon discovery of an improper and unlawful relationship. (See Ex. Vol. 8 (Doe I Petition ¶ 28, Roe 1 Petition ¶ 34, Johnny Does I Petition ¶ 19, 22, *see also* ¶¶ 20-21 (failure to report illegal relationship to authorities), Johnny Does II Petition ¶ 31; *see also* ¶ 32-33 (failure to report sexual relationship to authorities).)
 - Whether the District failed to report Caleb Elliott to law enforcement for investigation of the illegal relationship with a teenage student.
- Cameras in the locker room:
 - Knowledge of or involvement in an incident of Caleb Elliott placing cameras in the locker room in the 2024-25 school year. Ex. Vol. 8 (TEA Special Investigation Notice Allegation 2, Doe I Petition ¶ 52, Roe 1 Petition ¶ 47, Johnny Doe I Petition ¶ 30, Johnny Doe II Petition ¶ 36-37).)
 - Knowledge of or involvement in mailing apology letters to select parents of children imaged by cameras in the locker room during the 2024-25 school year. (Ex. Vol. 8 (Doe I Petition ¶ 52, Roe Petition ¶ 51, Johnny Doe I Petition ¶ 33, Johnny Doe II Petition ¶ 37).)
- Exclusion from the locker room:
 - Caleb Elliott’s exclusion from the locker room during the 2024-25 school year and his absence from the program for a period of time. (Ex. Vol. 8 (Doe I Petition ¶ 32, Roe 1 Petition ¶ 50; *see also* Roe 1 Petition ¶ 52; Johnny Does I Petition ¶ 32, Johnny Does II Petition ¶ 37).)
 - Whether CISD took steps to ensure Caleb Elliott complied with any locker room ban. (Ex. Vol. 8 (Roe 1 Petition ¶ 47).)

- Knowledge of Caleb Elliott requiring student(s) to do jumping jacks or burpees nude. (Ex. Vol. 8 (Doe I Petition ¶ 42, Johnny Does I Petition ¶ 41-42, Johnny Does II Petition ¶ 39).)
- Knowledge of other misconduct:
 - Whether at least one teacher at MMS reported that Caleb Elliott was behaving inappropriately towards children, but the district disregarded, minimized and ignored the report, and the reporting teacher left CISD employment as a result. (Ex. Vol. 8 (Johnny Does II Petition ¶ 35).)
 - Whether there was a confrontation between Caleb Elliott and another coach in relation to previous attempts to record children in the locker room; there being multiple witnesses to such incident. (Attorney Press Conference December 3, 2025; *available at <https://www.fox4news.com/video/1750523>*.)
 - Knowledge of or involvement in the situation in the locker room which would permit misconduct. (*See, e.g.*, Ex. Vol. 8 (Roe 1 Petition ¶ 46).)
 - Knowledge of Caleb Elliott's presence and/or conduct in the locker room during the 2025-26 school year before October 3, 2025. (Ex. Vol. 8 (Doe I Petition ¶ 36, Roe 1 Petition ¶ 57).)
 - Knowledge or involvement in any other concerns, of whatever nature, about Caleb Elliott. (*See, e.g.*, Ex. Vol. 8 (Roe 1 Petition ¶ 40).)
 - Whether the District insufficiently supervised Elliott's interactions with young boys in the locker room after [misconduct] was made known to the ISD through the failure to implement the use of two-deep leadership. (Ex. Vol. 8 (Johnny Does II Petition ¶ 48).)
 - Whether and when any CISD employee had reasonable cause to believe that a child's physical or mental health or welfare has been adversely affected by abuse or neglect, giving rise to a duty to report such abuse to authorities (Texas Department of Family and Protective Services and/or law enforcement). (Ex. Vol. 8 (TEA Special Investigation Notice Allegation 3).)
- District actions after October 3, 2025:
 - Whether Celina ISD officials discovered Caleb Elliott's criminal sexual misconduct, and failed to terminate his employment.
 - Whether the District failed to report Caleb Elliott to SBEC for immediate investigation and potential certificate revocation.
- Whether the District failed to train Caleb Elliott and others by way of written policies and continuing education in a manner which could have avoided the abuse. (Ex. Vol. 8 (Johnny Does II Petition ¶ 48).)

This Report also makes conclusions of violations of policy, regulation, and/or civil school laws of the state by District employees other than Caleb Elliott; and other systemic issues

within MMS and Athletics (specifically including any other violations of policy and/or law in hiring Caleb Elliott in any capacity but specifically, to teach at MMS for the 2023-24 school year).

This Report also makes conclusions regarding alleged violations of policy, regulation, and/or civil school laws of the state **TGC 552.101 / TEC 21.355**

Finally, the investigation also makes findings related to whether CISD Board member conduct has contributed to any issues identified in the investigation.

PRELIMINARY MATTERS

A. Statement of review

Through the Investigation, evidence was collected from the District, including individuals currently or formerly working at the District, members of the Board, and CPD. All relevant evidence—including both inculpatory and exculpatory evidence—was considered. This evidence (including Memoranda of Interviews with witnesses) is attached hereto in eight exhibit volumes.

B. Standard of evidence

Determinations in this Investigation were made using a preponderance of evidence standard. *See generally* Tex. Educ. Code § 21.256(h); CISD Board Policy DFBB(Legal).

C. Credibility

No credibility determinations have been based on the person's status as a complainant, respondent, or witness.

FINDINGS OF FACT

After due consideration of and based upon the preponderance of the credible evidence, including the credibility of the witnesses and matters officially noticed, I make the following Findings of Fact (citations to evidence are not exhaustive or exclusive, but are intended to indicate some basis for the particular finding of fact):

2012-13 School Year

1. After coaching since the 1998-99 school year, Bill Elliott becomes the CISD Athletic Director. (Ex. Vol. 3 p. 10.) Bill Elliott is moved from a 1-year Teacher/Coach contract for the 2012-13 school year, to a 3-year Administrator contract for the 2013-14 school year and has remained on a 3-year Administrator contract since that time. (Ex. Vol. 3 p. 12 (1-year Teacher/Coach contract for 2012-13), p. 16 (3-year Administrator contract for 2013-14, 2014-15, 2015-16), p. 20-27 (Bill Elliott's most recent contracts).) Cabinet-level administrators in the District have 2-year administrator contracts. (E.g., Ex. Vol. 3 p. 81 (Witness 12), p. 85 (Witness 15), p. 89 (Non-Witness 1).)

2017-18 School Year

2. April 11, 2018 – The District adds a subscription for Caleb Elliott with the Texas Department of Public Safety FACT Clearinghouse for criminal background check and monitoring.² (Ex. Vol. 1 at p. 163-64.) The subscription remains active as of the date of this Report. (Ex. Vol. 5 p. 224; *see also* Ex. Vol. 5 p. 164 (Witness 30).)
3. According to his CISD Service Record, Caleb Elliott was employed as a “seasonal employee” performing “assistance with summer grounds work,” for 11.5 days during the 2017-18 school year. (Ex. Vol. 1 p. 61; *see also* Ex. Vol. 1 p. 111-112.)

2018-19 School Year

² CISD “subscribed” to Caleb Elliott on April 11, 2018 when he first began working as a seasonal employee. (Ex. Vol. 5 p. 224 (Witness 30).) That subscription remains active for any employee until and unless it is cancelled by the District – and Caleb Elliott’s subscription has not been cancelled (to this day). *Id.* CISD maintains subscriptions for all employees, for all third-parties who do or may deal with students, including ESS subs and the District’s third-party cleaning service and private tutors. *Id.* All subscriptions (*i.e.*, people) are monitored daily for hits/changes to criminal backgrounds, including arrests, unless and until they are cancelled or unsubscribed. *Id.*

4. According to his CISD Service Record, Caleb Elliot was employed as a "seasonal employee," performing "assistance with summer grounds work" for 44 days during the 2018-19 school year. (Ex. Vol. 1 p. 61; *see also* Ex. Vol. 1 p. 113.)

2019-20 School Year

5. According to his CISD Service Record, Caleb Elliot was employed as a "seasonal employee," performing "assistance with summer grounds work" for 15 days during the 2019-20 school year. (Ex. Vol. 1 p. 61; *see also* Ex. Vol. 1 p. 114-116)
6. Tom Maglisceau is hired as Superintendent. The District was, and remains, in a period of substantial growth. (Ex. Vol. 5 p. 100 (Tom Maglisceau).)

2020-21 School Year

7. **TGC 552.101 / TEC 21.355**

TGC 552.101 / TEC 21.355 Non-Witness 3

. (Ex. Vol. 5 p. 105 (Tom Maglisceau's recollection).)
Maglisceau recalled that Non-Witness 4 **TGC 552.101 / TEC 21.355**

8. **TGC 552.101 / TEC 21.355**

TGC 552.101 / TEC 21.355

TGC 552.101 / TEC 21.355

?

TGC 552.101 / TEC 21.355

TGC 552.101 / TEC 21.355

TGC 552.101 / TEC 21.355

(TGC 552.101 / TEC 21.355 (Tom Maglisceau recalling this situation and indicating that he found his notes from the time period, which largely match what is cited, *supra*), 111-12 (Maglisceau's notes).)

10. TGC 552.101 / TEC 21.355

TGC 552.101 / TEC 21.355

TGC 552.101 / TEC 21.355

TGC 552.101 / TEC 21.355

12. TGC 552.101 / TEC 21.355

13. TGC 552.101 / TEC 21.355

TGC 552.101 / TEC 21.355

2022-23 School Year

15. Caleb Elliott's payroll records reflect payments for the month of June 2022 (\$720 for "Maint Sub"), July 2022 (\$2,160 for "Sub Custodian Extra Duty,"), and August

2022 (\$1,212 for "Sub Custodian/Maint Extra Duty"). (Ex. Vol. 1 p. 61 (Service Record); *see also* Ex. Vol. 1 p. 117-119.)

16. Caleb Elliott did not work for CISD or officially coach sports during the 2022-23 school year. (*See, e.g.*, Ex. Vol. 3 p. 4; Ex. Vol. 1 p. 61 (Service Record reflecting no employment with CISD for the 2020-21, 2021-22, and/or 2022-23 school years); *see also* Ex. Vol. 5 p. 224 (**Witness 32** recalling that Caleb Elliott may have observed occasional football practices and/or volunteered at track meets, but was not on the sidelines for football games and he did not coach during the 2022-23 school year).) **Witness 26** recalled that Caleb Elliott assisted some with coaching duties at MMS during his two-weeks as a long term sub for a teacher who also had coaching duties. (*See infra*, Paragraph 25.)

17. CISD contracts with "ESS" for substitute teachers—and subs are employed and paid by ESS, not CISD. (*See* Ex. Vol. 5 p. 165; *see also* ESS.com/about-us (last visited Nov. 30, 2025).) ESS records reflect that Caleb Elliott worked for ESS as a substitute at CHS (and other CISD campuses) during the 2022-23 school year. (Ex. Vol. 1 p. 150-152; *see also* Ex. Vol. 1 p. 61 (Service Record reflecting no teaching experience during the 2022-23 school year.) ESS states that ESS does not complete employee evaluations for substitutes but maintains records for any incident reports submitted by a partnering District. (Ex. Vol. 1 p. 147.) ESS states that it finds no incidents on file for Caleb Elliott. *Id.*

18. During the 2022-23 school year, District records show that Caleb Elliott may have substituted about five times for teachers on **Witness 29** 's course schedule, at a time when **Witness 29** may have been present in the class. (Ex. Vol. 1 p. 149.) **Witness 29** states does not remember meeting or seeing Caleb Elliott while **Witness 29** was in high school. (Vol. 5 p. 160.) states that if schedule reflects that did have classes for which Caleb Elliott was subbing, that had a number of schedule changes and missed many days of school. *Id.* Based on graduation date (^{TGC 552.101 / TEC 21.355}), **Witness 29** **TGC 552.101 / TEC 21.355** in the 2022-23 school year. (*See infra*, Paragraph 49.)

19. March 2023 – Allison Ginn, who had been working in Frisco ISD as an Assistant or Associate Principal is hired as MMS Principal. (Ex. Vol. 2 p. 2.) Allison Ginn holds certifications as a Classroom Teacher and a Principal. (Ex. Vol. 2 p. 11.)

20. April 2023 – Allison Ginn begins working full time in CISD as MMS principal. (Ex. Vol. 2 p. 2.)

21. May 2023 – **Witness 22** is hired as . (Ex. Vol. 1 p. 16; Ex. Vol. 5 p. 128 (**Witness 22**).)

22. May 5, 2023 – Allison Ginn and Bill Elliott exchanged cordial text messages. (Ex. Vol. 2 p. 42.) Bill: “Good morning! When do you want me to send Caleb Elliott for an interview?” Allison: “Tell Caleb to check his email. I sent him some dates for an interview. Have a wonderful weekend, Coach!” Bill: “Yes ma’am thank you. You do also!” (Ex. Vol. 2 p. 42.) Interviewing a candidate before an application is submitted is inconsistent with best practice described by others in the Investigation.⁵

23. May 7-8, 2023 – Allison Ginn and Witness 26 (at the time) interviewed Caleb Elliott. (Ex. Vol. 5 p. 187; *see also* Ex. Vol. 5 p. 195 (Witness 26).) The interview questions for Caleb Elliott were updated by Allison Ginn on this date, saved to a google drive, and provided in the Investigation by Witness 33 . (Ex. Vol. 5 p. 187, 192-93.) Although Ginn states Caleb Elliott did not do well in the interview or have good answers to questions, no ratings or other indication in the interview notes corroborates that recollection. (Ex. Vol. 2 p. 4; Ex. Vol. 5 p. 192-93; Ex. Vol. 5 p. 222 (Allison Ginn confirming that these were the interview notes for Caleb Elliott).) Witness 26 felt it was a foregone conclusion that Caleb Elliott would be hired based on who his dad is. (Ex. Vol. 5 p. 195 (Witness 26).)

24. May 10, 2023 – Caleb Elliott completed an application for employment at CISD. (Ex. Vol. 1 p. 3-11.) The application indicates he is in the process of becoming Social Studies certified. *Id.* at 5. The application indicates that he graduated from University of North Texas in December 2022. *Id.* at 6. The application indicates substitute teaching experience from September 2021 to the present, reporting to Non-Witness 21 at ESS. *Id.* The application states Elliott worked in part time “maintenance,” from May 2022 through August 2022, reporting to Non-Witness 22. *Id.* at 6-7. Elliott’s personal references listed are Witness 10 , and a family friend; Non-Witness 23 , a family friend; and Non-Witness 24 , *Id.* at 9.

25. May 12-24, 2023 – ESS Sub records show that Caleb Elliott subbed for about two weeks for a MMS social studies teacher (as a “long-term sub”). (Ex. Vol. 1 p. 152; *see also* Ex. Vol. 5 p. 210 (Witness 36).) Witness 26 was the at that time and states that had concerns about Elliott’s maturity, and he seemed like another student/kid, not like a teacher. (Ex. Vol. 5

⁵ See, e.g., Ex. Vol. 5 p. 25 (Witness 6 describing that open positions will be posted online, resumes will be collected and reviewed, and then an interview will occur.); Ex. Vol. 5 p. 39 (Witness 7 describing a similar process when was hired.); Ex. Vol. 5 p. 210 (Witness 36 describing posting, reviewing applications before an interview.).

p. 194.) Witness 26 gave the example that once, Caleb Elliott came out of the locker room to the gym for a pep rally (or other assembly) as he was subbing for a coach and thus assisting some with coaching. *Id.* Witness 26 recalled that Caleb's shirt was inside out, and his zipper down (he was not exposing himself, but he had just gotten dressed in a hurry, like a kid would). *Id.* There was nothing about Caleb Elliott that caused Witness 26 concern to such a level that had to make any sort of report, and did not make any reports about Caleb Elliott. (Ex. Vol. 5 p. 195.) Witness never knew of anyone else making a report about Caleb Elliott. *Id.*

26. Summer 2023—Witness 26 leaves CISD for a TGC 552.101 / TEC 21.355 (Ex. Vol. 5 p. 194.) left the District because , wanted to be around for . *Id.* said there were also teachers at MMS leaving, "crew" was disbanding, so left for that reason too. *Id.*

27. In or about early June 2023—Caleb Elliott failed his certification exam for the second or third time. (E.g., Ex. Vol. 5 p. 8 (Witness 2).) Allison Ginn provided text messages reflecting that she shared with Non-Witness 6 frustration that Caleb Elliott failed his certification exam by 21 points. (Ex. Vol. 2 p. 54.) In her text, she states that she is "pissed bc again, that's not what dad or Caleb said to me yesterday," and "he wants me to help him study." *Id.*

28. June 6, 2023—Allison Ginn requests an in-person meeting with Bill Elliott by text: "Morning, Coach. I was hoping you may have 10-15 min today to visit in person to follow up on our convo yesterday. I can come to you, if you give me a couple of time slots." (Ex. Vol. 2 p. 4 (Ginn recalling an in-person meeting at MMS after a tense phone call); 44.) Bill Elliott agrees to go to MMS at 9:30 am. *Id.* It appears that this is the meeting where raised voices were overheard by Witness 16 , the . (Ex. Vol. 5 p. 91-92.) ^{Witness 16}'s work hours as include time over the summer, but most employees were gone from campus for the summer at this time. *Id.*

29. Bill Elliott exerted his influence in the process by which his son, Caleb Elliott, was hired.⁶ (Ex. Vol. 2 p. 4; Ex. Vol. 5 p. 26.) Although there appear to be no first-hand

⁶ Some witness statements reflect no knowledge of any improper influence by Bill Elliott in hiring Caleb Elliott at MMS. (Ex. Vol. 5 p. 129 (Witness 22); Ex. Vol. 5 p. 183 (Witness 32); Ex. Vol. 5 p. 187 (Witness 33)); Ex. Vol. 5 p. 210, 220 (Witness 36).) At least one witness stated that he did not hear anything about Bill Elliott's influence at the time, but after Caleb Elliott was arrested, Ginn stated she was forced to hire Caleb Elliott. (Ex. Vol. 5 p. 187 (Witness 33).)

witnesses to conversations between Allison Ginn and Bill Elliott held at the time (other than Ginn and Elliott), Bill Elliott does not deny asking Ginn to wait longer for Caleb Elliott to pass his exam before hiring someone else, but states that this happens with coaches other than Caleb Elliott. (Ex. Vol. 3 p. 3, 8 (Bill Elliott providing examples of waiting for coaches/teachers to finish their certification process, and this was not a request unique to Caleb Elliott); *but see* Ex. Vol. 5 p. 91-92 (**Witness 16** recalling that _____ was at school and heard "raised voices," when Ginn and Bill Elliott met in person about whether Ginn would hold open a position for Caleb Elliott); Ex. Vol. 5 p. 221 (Allison Ginn Follow Up conversation).) Bill Elliott does not remember (but does not deny) the other details Ginn states about the time period when Caleb Elliott was hired—that the two butted heads over the issue and Bill Elliott apologized to her about the situation. (Ex. Vol. 3 p. 3.) Bill Elliott does not deny that **Non-Witness 6** _____ or someone else may have cautioned him about speaking to Ginn in the manner that he did about the position for his son. (Ex. Vol. 3 p. 3.)

30. Witnesses close to Ginn at the time recalling hearing from Ginn during this time frame that Ginn did not want to hire Caleb Elliott, but Bill Elliott said she "had to" wait to see if Caleb could pass his certification exam. (E.g., Ex. Vol. 5 p. 8 (^{Witness 2} TGC 552.101 / TEC 21.355 **Witness 16** recalling that _____ worked in the _____ department (_____) and Ginn told _____ at the time that she wanted to "pass" on hiring Caleb Elliott, but that Bill Elliott told Ginn that she had to hold the position open); Ex. Vol. 5 p. 26 (**Witness 6** recalling that Ginn told him at the time that Bill Elliott got very upset with her and probably "reamed her out pretty good"); Ex. Vol. 5 p. 63 (**Witness 12** _____); Ex. Vol. 5 p. 79 (**Witness 14** _____); Ex. Vol. 5 p. 91-92 (^{Witness 16} TGC 552.101 / TEC 21.355 **Witness 16** recalling that after _____ overheard raised voices, Ginn was unhappy and told **Witness 16** that she would have to "wait on" Caleb Elliott, and that it was the "Celina way," or something to that effect); Ex. Vol. 5 p. 205 (**Witness 35** _____); *see also* Ex. Vol. 5 p. 98 (Tom Maglisceau recalling hearing at the time that Bill Elliott told Ginn something like "that's not how we do things around here," but that _____ did not get the idea she was "forced"); Ex. Vol. 5 p. 215 (**Witness 37** _____).) During this time, Bill Elliott was upset in a separate conversation with **Witness 6** that MMS would not wait on Caleb Elliott to pass his certification test. (Ex. Vol. 5 p. 25.)

31. To be clear, there is not evidence that Caleb Elliott should not have been hired due to any alleged misconduct (known or unknown) at the time he was hired. Further, there is not evidence that there was any reason to suspect that he might someday go on to commit misconduct at the time he was hired. Nonetheless, exerting influence on a campus principal to hire _____ reflects poorly on _____, Athletics, and the District as a whole.

32. Board members agree that a parent should not pressure a principal to hire their own child; and if Bill Elliott did that, it would be inappropriate. (*See generally* Ex. Vol. 5 p. 13 (Witness 3) ; Ex. Vol. 5 p. 58 (Witness 11) ; Ex. Vol. 5 p. 198 (Witness 34).)

33. June 2023 – Witness 12 is hired as , but ^{Non-Witness 6} continued to oversee principals. (Ex. Vol. 5 p. 62.)

34. June 19, 2023 – Allison Ginn and Bill Elliott exchange text messages about positions, where Ginn states she will interview a candidate “as a backup for Caleb.” (Ex. Vol. 2 p. 43.) Witness 26 states that, to knowledge, no other candidates were actually interviewed for the position. (Ex. Vol. 5 p. 195.)

35. June 20, 2023 – Allison Ginn and Non-Witness 6 exchange text messages about Non-Witness 3 . (Ex. Vol. 2 p. 55.) Ginn asks if she can assign ^{Non-Witness 3} an advisory period with partner, to which ^{Non-Witness 6} agrees. *Id.* Non-Witness 6 reminds Ginn that “[^{Non-Witness 3}] will not always be on campus due to games and athletic.” *Id.* In her witness interview in the Investigation, Ginn stated ^{Non-Witness 3} was “TGC 552.101 / TEC 21.355 ” and the Superintendent and ^{Non-Witness 6} met with her and stated there is TGC 552.101 / TEC 21.355

TGC 552.101 / TEC 21.355 TGC 552.101 / TEC 21.355

2023-24 School Year

36. July 2023 – Tom Maglisceau calls Bill Elliott around this time to impress upon him that we need to trust the process and allow Ginn to hire for her campus (referring to Caleb Elliott’s hire); to which Maglisceau states Bill Elliott responded in a respectful way, and not nearly as “aggravated” as Maglisceau had been led to believe he was. (Ex. Vol. 5 p. 98.)

37. July 5, 2023 – Allison Ginn “contacted” references for Caleb Elliott’s employment. (Ex. Vol. 1 p. 16.) Ginn did not contact references listed on Caleb Elliott’s application, and she explains that they had not observed him in a school setting. (Ex. Vol. 5 p. 223.) Ginn did not contact the ESS supervisor for a reference regarding Caleb Elliott. (*See generally* Ex. Vol. 1 p. 5 (ESS Supervisor contact

information on Caleb Elliott's application); Ex. Vol. 5 p. 86 (Witness 15 stating that at least one external reference should be contacted, suggesting the ESS sub provider.) The reference check spreadsheet does not indicate Ginn contacted Witness 26 as a reference, even though TGC 552.101 / TEC 21.355

. (Ex. Vol. 5 p. 194-95 (Witness 26 stating

believes told Ginn that Caleb Elliott would not be a good fit for the position based on his immaturity in experience working with him.) Instead, Ginn herself served as Caleb Elliott's first reference, stating that she has known Elliott for one semester as his supervisor.⁷ (Ex. Vol. 1 p. 16.) She states he, "always shows up with a smile on his face, eager to please." *Id.* She states that his areas of improvement are "content knowledge, classroom management." *Id.* To the question of whether she would rehire Caleb Elliott, she responded "Yes." *Id.* Ginn contacted

Witness 6 as a second reference for Caleb

Elliott, who stated Caleb Elliott's strengths are "hardworking, committed." *Id.*

Witness 6 states Caleb Elliott's areas of improvement are, "green and needs a chance to grow." *Id.* Ginn did not contact a third reference. *Id.* A small sample of reference checks for new-hires at MMS during this same time period shows that third references were not always checked by administration. (Ex. Vol. 1 p. 16.)

38. July 7, 2023 - Although the specific date on which Caleb Elliott passed his certification test is unclear, it is believed that he passed in late June or early July. Caleb Elliott's Statement of Eligibility for Internship is completed by Teachworthy, an educator preparation program, and Witness 36 at CISD. (Ex. Vol. 1 p. 18.)
39. July 10, 2023 - District records reflect Allison Ginn offers Caleb Elliott an assignment at MMS as Teacher. (Ex. Vol. 1 p. 12-15.)
40. July 13, 2023 - Caleb Elliott signs a Probationary Contract to teach for the 2023-24 school year, and associated job description. (Ex. Vol. 1 p. 19-25.)
41. July 31, 2023 - Caleb Elliott's Intern Teaching certificate is effective, through July 31, 2024. (Ex. Vol. 1 p. 17.)
42. August 3, 2023 - Allison Ginn continues to have ongoing issues with Athletics. She provided texts which reflect that on this day, she texted Non-Witness 6 : "Complete and utter bs; Every blow from athletics makes me regret my decision to come to Celina; It's not fun. It's not human. It just doesn't seem real." (Ex. Vol. 2 p. 56.)

⁷ Allison Ginn "contacted" herself as a reference for Caleb Elliott and others. (Ex. Vol. 1 p. 16 (e.g., Witness 22).)

43. According to his CISD Service Record, Caleb Elliot was employed as "Jr High Social Studies," 187 days during the 2023-24 school year. (Ex. Vol. 1 p. 61)

44. March-April 2024 – Caleb Elliott was evaluated by Witness 22 . (Ex. Vol. 1 p. 37-43.) The evaluation reflects overall proficient performance, with a rating of "Developing" (below proficient) in Managing Student Behavior. (Ex. Vol. 1 p. 41; Ex. Vol. 5 p. 131 (Witness 22); *see also* Ex. Vol. 2 p. 6 (Allison Ginn describing the certification program supervisor's concern about classroom procedures—which were resolved after Caleb Elliott's first year); Ex. Vol. 5 p. 206 (Witness 35).)

45. March 27, 2024 – Bill Elliott timely signs a 3-year Administrator contract for 2024-25, 2025-26, 2026-27. (Ex. Vol. 3 p. 20.)

46. April 2, 2024 – Witness 15 begins work at the District as . (Ex. Vol. 5 p. 85.)

47. April 22, 2024 – Caleb Elliott signs a Probationary Contract to teach for the 2024-25 school year. (Ex. Vol. 1 p. 26-29.)

48. Spring 2024 [Date illegible] – Caleb Elliott receives a coaching evaluation from Witness 6 with no concerns reflected.⁸ (Ex. Vol. 5 p. 34-36.)

49. May 19, 2024 – Witness 29 graduates from CHS. (Ex. Vol. 5 p. 160 (Witness 29); *see also* CHS ^{TGC 552.101} Graduation Ceremony TGC 552.101 / TEC 21.355)

50. June 2024 - CPD's forensic review of Caleb Elliott's phone reflects messages between Caleb Elliott and Witness 29 began in June 2024 (one month after Witness 29 's graduation from CHS). (Ex. Vol. 7 p. 15.) No evidence contradicts Witness 29's statement that and Caleb Elliott met and "started talking" in June 2024 and began dating in July 2024. (See Ex. Vol. 5 p. 160; *but see* Ex. Vol. 5 p. 65 TGC 552.101 / TEC 21.355)

No evidence in the Investigation suggests any type of relationship between Caleb

⁸ Witness 6 explained that regarding coaching evaluations – "Coaches fill out this evaluation form. I look at their evaluation and determine if there are any areas that need to be addressed. If so, we meet and discuss. If not, I sign off and file. This is the same process as HS uses." (Ex. Vol. 5 p. 28.) Witness 30 expressed concern that there are no Human Resources records of coaching evaluations. (Ex. Vol. 5 p. 164 (Witness 30).) In the course of the Investigation, it was revealed that coaching evaluations appear to be housed at the campuses. (See Ex. Vol. 2 p. 83 (Memo Regarding Evaluation Status Report & Evaluation Log).)

Elliott and Witness 29 (whether friendship or romantic) began before June 2024.

2024-25 School Year

51. According to his CISD Service Record, Caleb Elliott was employed as "Teacher - Social Studies," 186.5 days during the 2024-25 school year. (Ex. Vol. 1 p. 61.) The District's payroll records also reflect a coaching stipend paid for the 2024-25 school year. (Ex. Vol. 1 p. 107; *see also* Ex. Vol. 1 p. 131 (football and conditioning camp pay in August 2024).)
52. Witness 29 was in the District during the 2024-25 school year. (Ex. Vol. 2 p. 160; Ex. Vol. 5 p. 160.)
53. October 2024 - Non-Witness 6 retires and Witness 12 takes over role supervising principals. (Ex. Vol. 5 p. 62.) Witness 2 is promoted from to . (Ex. Vol. 5 p. 7.)
54. October 2024 - Multiple witnesses describe learning that Caleb Elliott is homosexual during the October/Fall 2024 time frame. (E.g., Ex. Vol. 2 p. 5; Ex. Vol. 3 p. 4 (Bill Elliott); Ex. Vol. 5 p. 8 (Witness 2); Ex. Vol. 5 p. 63 (Witness 12).) Around this time, the news of Caleb Elliott's homosexuality had "blown up, everywhere." (Ex. Vol. 5 p. 79 (Witness 14 recalling hearing about this information at a football tailgate); *see also* Ex. Vol. 2 p. 5 (Ginn describing learning Caleb Elliott was gay, and he cried and cried after this information came out); Ex. Vol. 5 p. 21 (Witness 5); Ex. Vol. 5 p. 39 (Witness 7 learning of Caleb Elliott's partner "when everyone else did"); Ex. Vol. 5 p. 63 (Witness 12 recalling that someone saw Caleb Elliott and his partner out, which caused Caleb Elliott to make a social media post coming out as gay); Ex. Vol. 5 p. 137 (Witness 23 describing seeing the photo of Caleb Elliott and Witness 29 at McDonalds, and learning that they were dating); Ex. Vol. 5 p. 143 (Witness 24 describing that she learned Caleb Elliott was gay "when the rest of the community learned, last year (2024) during football season"); Ex. Vol. 5 p. 179 (Witness 31 stating she learned Caleb Elliott was gay at this time and was shocked); Ex. Vol. 5 p. 205 (Witness 35 recalling learning in the spring of 2025 that "high schoolers in the community had 'outed' Caleb Elliott as gay").) Other than Witness 29 (*supra*, Paragraph 50), no witness reported that they learned or knew Caleb Elliott was gay before October 2024.
55. October 15, 2024 - Allison Ginn described that she learned Caleb Elliott is gay when someone sent her photos or videos of Caleb Elliott with Witness 29 . (Ex. Vol. 2 p. 5; *see also* Ex. Vol. 2 p. 39 (Witness 14 sending Ginn a video

apparently of Caleb Elliott and a male companion at a fast food restaurant stating "This was taken by a HS student is all that I know".) states and others offered support to Caleb Elliott because he appeared very distraught about the situation.⁹ (Ex. Vol. 2 p. 5.) Text messages reflect that evening Witness 14 sent Ginn a photo of Witness 29 . (Ex. Vol. 2 p. 38; Ex. Vol. 5 p. 77, 220 (Witness 14 explaining that received the photo from a ^{TGC 552.101 / TEC 21.355} and texted it to Ginn so Ginn could see who ^{Witness 29} was.) Witness 29 was around this time. (Ex. Vol. 5 p. 222.)

56. Other witnesses report not knowing who Caleb Elliott was dating until after his arrest. (Ex. Vol. 5 p. 64 (Witness 12); Ex. Vol. 5 p. 100 (Tom Maglisceau); *see also* Ex. Vol. 5 p. 88 (Witness 15 describing not knowing Caleb Elliott was gay until after his arrest).)
57. October 2024 – By all accounts, the news of Caleb Elliott's sexual orientation became the talk of the town in the fall of 2024 – causing his participation in Varsity football to be noticeably interrupted. Multiple witnesses recalled that after he came out as homosexual, Caleb Elliott no longer volunteered on the sidelines at the Varsity games on Friday night. (E.g., Ex. Vol. 2 p. 6 (Allison Ginn stating that Caleb Elliott told her that Bill Elliott said he was no longer welcome on the sidelines); Vol. 3 p. 4 (Bill Elliott stating it was Caleb Elliott's choice not to attend Varsity games after he came out); Ex. Vol. 5 p. 100 (Tom Maglisceau describing noticing Caleb Elliott's absence from the Varsity games after this news came out); Ex. Vol. 5 p. 41 (Witness 7 suspecting that the abrupt absence was due to a fight with Bill Elliott after Caleb Elliott came out); Ex. Vol. 5 p. 116 (Witness 19).)
58. October 2024 - Witness 6 made a decision to switch Caleb Elliott's after-practice duty location from the MMS locker room to the cafeteria for the remainder of the 2024-25 school year. (Ex. Vol. 2 p. 6; Ex. Vol. 5 p. 27; Ex. Vol. 5 p. 64 (Witness 12 recalling conversations with Ginn at the time).) Witness 6 decided to do this because understood there were some board members who were upset about Caleb Elliott coming out as gay; ^{Witness 6} did not make the decision based on any allegation of misconduct. (Ex. Vol. 5 p. 27; Ex. Vol. 5 p. 116 (Witness 19).) No evidence suggests Caleb Elliott was ever "excluded," from the locker room – or that any witness had knowledge that he was banned in any way. (E.g., Ex. Vol. 5 p. 21 (Witness 5); Ex. Vol. 5 p. 27, 220 (Witness 6 describing that Caleb Elliott was

⁹ Multiple witnesses described an awareness or impression that Caleb Elliott's homosexuality caused difficulties in the Elliott family during this time – and specifically between Bill and Caleb Elliott. (E.g., Ex. Vol. 2 p. 5 (Allison Ginn); Ex. Vol. 5 p. 14 (Witness 3); Ex. Vol. 5 p. 64 (Witness 12); Ex. Vol. 5 p. 100 (Tom Maglisceau).)

not banned, so he may have subbed in for locker-room duty occasionally in the spring); Ex. Vol. 5 p. 41 (Witness 7); but see Ex. Vol. 5 p. 9 (Witness 2 recalling that heard say last spring that Caleb Elliott is not or should not “be allowed” in the locker room because they learned he was gay).)

59. November 2024 – Witness 15 begins to take over duties in preparation for the TGC 552.101 / TEC 21.355. (Ex. Vol. 5 p. 85.) Witness 15 remains supervising TGC 552.101 / TEC 21.355 until Witness 30 is hired in March 2025. (Ex. Vol. 5 p. 85.)

60. Caleb Elliott did not receive a full evaluation during the 2024-25 school year. (E.g., Ex. Vol. 1 p. 51-54 (blank evaluation form dated 3/25/25), p. 55-57 (reflecting an overall proficient 9-minute walk-through evaluation on 1/28/25), p. 58-60 (reflecting an overall proficient 22-minute walk-through evaluation on 10/8/24).)

61. District records show that very few Summative Evaluations were completed at MMS for the 2024-25 school year. (Ex. Vol. 2 p. 83-91; see also Ex. Vol. 5 p. 66 (Witness 12); Ex. Vol. 5 p. 188 (Witness 33 acknowledging that and Allison Ginn are not good about conducting teacher evaluations).) Apparently, only three employees at MMS received a summative evaluation for the 2024-25 school year.¹⁰ (Ex. Vol. 2 p. 7; Vol. 2 p. 83, 88-92.) Two of those three are at-will office staff. (Ex. Vol. 2 p. 89 (Witness 14 and Witness 16).) The records show that Witness 2 did conduct full classroom observations for most of assigned teachers, but the other administrators (including Allison Ginn) did not. (Ex. Vol. 2 p. 87-91.) Ginn reportedly made clear that evaluations were “not a priority” at that campus. (See Ex. Vol. 5 p. 188 (Witness 33); see also, e.g., Ex. Vol. 5 p. 18 (Witness 4 stating has not been evaluated (not even a walk through) since before Ginn became principal); see also Ex. Vol. 5 p. 130 (Witness 22 stating tried to do evaluations).)

62. Board members assume that campus administrators are using annual evaluations in order to make informed contract renewal recommendations. (See generally, e.g., Ex. Vol. 5 p. 13 (Witness 3); Ex. Vol. 5 p. 60 (Witness 11); Ex. Vol. 5 p. 198 (Witness 34), 202 (Witness 34 reporting a rumor that evaluations were not occurring as they should, and how that can lead to an unsafe and unprofessional work environment that may lead to other unsafe behavior).)

63. There is a perception that MMS is “freer,” and less structured than CHS. (Ex. Vol. 5 p. 3 (Witness 1); see also Ex. Vol. 5 p. 48 (Witness 8 expressing a

¹⁰ Even before this Investigation began, Witness 30 had become aware of this issue and is taking measures to correct it.

concern that smaller issues at MMS—like unnatural hair color, unprofessional dress for staff, and/or hiring Caleb Elliott’s significant other to work there—can accumulate to a point where staff feel “too comfortable,” and push the envelope with unacceptable behavior); Ex. Vol. 5 p. 201 (Witness 34 expressing similar).)

64. Around Christmas 2024 – Witness 31 reports that around this time, Caleb Elliott told he would not be returning to teaching next year, he didn’t like teaching. (Ex. Vol. 5 p. 180.) Witness 31 is a

(Ex. Vol. 5 p. 178.) Witness 6 also reported that in the spring of this school year, Caleb Elliott said he was not teaching anymore after that year, and was intending to go to fire school. (Ex. Vol. 5 p. 27.)

65. February 21, 2025 – Allison Ginn enters a contract recommendation that Caleb Elliott receive a Term Contract for 2025-26, but the recommendation form reflects he completed only 2/3 of a typical probationary period. (Ex. Vol. 4 p. 176 (Contract Recommendations edit history).) It appears that Allison Ginn recommended a number of other employees who were still in a probationary period to receive Term Contracts for the 2025-26 school year. (*Id.*; *see also* Ex. Vol. 5 p. 173 (e.g., Non-Witness 7 (completed only 1/2 probationary period), Non-Witness 8 (same), Non-Witness 9 (same), Non-Witness 10 (same), and several others).) Ginn states that Witness 36 would have given her permission to give Caleb Elliott an early term contract (that considered the third year an option but not required). (Ex. Vol. 5 p. 222; *see also* Ex. Vol. 5 p. 211 (Witness 36 stating that understanding is that the third year is “optional”).) However, Witness 36 was not TGC 552.101 / TEC 21.355 that Ginn recommended an early term contract for Caleb Elliott.

66. Approx. March 5, 2025 – TGC 552.101 / TEC Parent 1 raises a concern to Witness 27 , asking “who is Mr. Elliott,” or something to that effect. (Ex. Vol. 5 p. 153 (Witness 27).) Parent 1 went on to say that Student 1 had told Parent 1 bought an Apple Watch from Caleb Elliott on that Monday (March 3), and had previously bought cologne from Caleb Elliott for \$50. *Id.* Witness 27 recalls that was at Student 1’s house that night (because is personal friends with Parent 1) and asked Student 1 about all of it. *Id.* Witness 27 understood that Parent 1 was worried that Student 1 FERPA / TGC 552.101 / TEC 21.355. *Id.* Witness 27 states told Parent 1 didn’t know if that was true or not, and would go talk to administration the next day. *Id.* Witness 27 states that the next day, talked with Witness 22 , and Witness 2 was also there. *Id.* Witness 27 states told them Student 1 had a live fish at school, and also told them about the watch. *Id.* Witness 27 recalls the administrators said OK. *Id.* Witness 27 states believed

that reporting to ^{Witness 22} was sufficient because was over
. *Id.*

TGC 552.101 / TEC

67. March 10, 2025 – Caleb Elliott emailed parent ^{Parent 1} :

I have provided ^{Student 1} with the Apple Watch at school for ^{Student 1} to use. It was supposed to be a reward for ^{Student 1} to use after ^{S1} completed work during class. I have now seen it has become a distraction as well. I wanted to apologize for giving ^{Student 1} the watch. I will talk to ^{Student 1} and ^{S1} will get ^{S1's} belongings back. I will find a way through ^{S1's} Ipad to reward ^{Student 1} for ^{S1's} work instead. ^{S1} has been a great student in class and ^{FERPA / TGC 552.101 / TEC 21.355}. I believe ^{FERPA / TGC 552.101 / TEC 21.355} has helped ^{Student 1} ^{FERPA / TGC 552.101 / TEC 21.355} ^{S1} comes to class respectful each day to peers and teachers. Hope you have a great day! Please feel free to reach out anytime!

To which ^{Parent 1} responds:

I'm glad you're taking it back. It's definitely not helping ^{Student 1} to focus and stay on task. I do appreciate you looking for ways to navigate ^{Student 1} through your class. Is ^{S1} ^{FERPA / TGC 552.101 / TEC} ?

(Ex. Vol. 1 p. 145; *see also* Ex. Vol. 5 p. 9 (^{Witness 2} recalling that ^{Student 1} ^{TGC 552.101 / TEC 21.} asked about ^{Student 1} buying an Apple Watch); Ex. Vol. 5 p. 153 (^{Witness 27}).)

68. ^{Witness 22} handled Apple Watch this situation with Caleb Elliott with the understanding that there was no suggestion that there was any history of Caleb Elliott selling watches, or any apparent closeness between Caleb Elliott and ^{Student 1}. (Ex. Vol. 5 p. 9 (^{Witness 2}); Ex. Vol. 5 p. 130 (^{Witness 22} describing the situation and that nothing seemed inappropriate – other than teachers should not be selling things at school, school is not a business); *see also* Ex. Vol. 5 p. 153 (^{Witness 27} recalling that did not see the behavior as "grooming" at that time, and it just seemed like a "dumb teacher making dumb decisions").) Although ^{Witness 22} states did tell Allison Ginn about the watch at the time, Ginn states she only learned of the watch after Caleb Elliott's arrest. (Ex. Vol. 5 p. 131 (^{Witness 22}); Ex. Vol. 2 p. 6 (Allison Ginn).) It is unclear whether ^{Witness 22} contacted the parent, but **TGC 552.101 / TEC 21.355** . (E.g., Ex. Vol. 131 (^{Witness 22's} ' belief that did contact the parent); Ex. Vol. 5 p. 134 (email from ^{Parent 1} after Caleb Elliott's arrest stating that "no one from administration contacted me about this but I didn't do anything farther [sic] as I felt the situation was resolved when Elliott gave the money back and ^{Student 1} gave the watch back"); Ex. Vol. 5 p. 107 (Maglisceau); *see also* Ex. Vol. 5 p. 9 (^{Witness 2} describing that would have

added a note to Caleb Elliott's file to simply document the issue.) There appears to be no email or documentation to corroborate Witness 22's ' recollection that did contact the parent.

69. Spring 2025 - ^{TGC 552.101 / TEC 21} Witness 34
Witness 34's ^{Student 9} tells ^{TGC 552.101 / T} (that ^{Student 9} bought cologne from Caleb Elliott. (Ex. Vol. 5 p. 198.) Witness 34 and told ^{Student 9} that it is not appropriate to buy things at school, "shutting it down." *Id.* Witness 34 and didn't think much of anything else about the situation at that time. *Id.* Witness 34 and could have (and would have) gone to MMS administration to report the behavior if they thought it warranted reporting, but they did not.¹¹ *Id.* ^{Student 9} stopped buying things from Caleb Elliott after that. *Id.*

70. March 31, 2025 - The District's offer to Bill Elliott of a 3-year Administrator contract expires. (Ex. Vol. 3 p. 27 ("This offer of employment Contract shall expire unless you sign and return this Contract to the Superintendent on or before 03/31/2025. If you are currently employed under a contract with the District and you fail to sign and return this Contract, without changes, by the return date, your existing contract will expire on its own terms and your employment will end at the conclusion of that contract.").) Bill Elliott does not timely sign and return his 3-year Administrator contract renewal. (Ex. Vol. 3 p. 24 (Signed 4/5/25).)

71. March 31, 2025 - Witness 30 starts work as the .
(Ex. Vol. 5 p. 163 (Witness 30).)

72. April 5, 2025 - Bill Elliott signs and returns the expired 3-year Administrator contract. (Ex. Vol. 3 p. 24.) On its own terms, this contract was void and as of the date of this Report, Bill Elliott's March 27, 2024 contract remains the operative contract of Bill Elliott's employment. (*See supra*, Paragraph 45.)

73. April 17, 2025 - Caleb Elliott receives a coaching evaluation from ^{Witness 6} with no concerns reflected.¹² (Ex. Vol. 5 p. 31-33.)

¹¹ Witness 34 shared that, in retrospect, has been concerned that Caleb Elliott selling cologne could almost be like grooming—as it made Caleb Elliott likeable/different/popular among students. (Ex. Vol. 5 p. 199.) But that did not occur to them at the time.

¹² Witness 6 explained that regarding coaching evaluations—"Coaches fill out this evaluation form. I look at their evaluation and determine if there are any areas that need to be addressed. If so, we meet and discuss. If not, I sign off and file. This is the same process as HS uses." (Ex. Vol. 5 p. 28.)

74. May 6, 2025 – Caleb Elliott timely signs a Term Contract to teach for the 2025-26 school year, and associated job description. (Ex. Vol. 1 p. 30-36.)

2025-26 School Year

75. Caleb Elliott is employed as social studies teacher for the 2025-26 school year and receives football summer camp and conditioning camp stipends in August 2025. (Ex. Vol. 1 p. 141 (football and conditioning camp pay in August 2025).)

76. Witness 29 is employed as at
(Ex. Vol. 5 p. 160.) Allison Ginn stated that the team loved Witness 29,
Student 10 was in the program and was the candidate of their choice—but she did
wonder if it was a good idea to hire . (Ex. Vol. 5 p. 222.)

77. Some witnesses expressed concern about the judgment of hiring the significant other of a teacher at the campus. (E.g., Ex. Vol. 5 p. 179 (Witness 31 describing how) learned that Witness 29 was TGC 552.101 / TEC 21.355 from other students, and this made uncomfortable and served as a distraction to learning); Ex. Vol. 5 p. 199 (Witness 34 expressing similar concerns about his own child/student at MMS); Ex. Vol. 5 p. 205 (Witness 35 wondering if middle schoolers might "make a thing of it").)

78. 2025-26 School year-Before Caleb Elliott's arrest, the coaches' class schedules dictate who is assigned to locker-room duty vs. cafeteria duty. (Ex. Vol. 5 p. 27; Ex. Vol. 5 p. 117 (Witness 19)). Witness 6 was never directed by MMS administration if should "do anything specific with a gay coach." (Ex. Vol. 5 p. 27.) The coaches' class schedules dictated that Caleb Elliott would be assigned to locker room supervision for 2025-26. (Ex. Vol. 5 p. 27; Ex. Vol. 5 p. 116 (Witness 19)).

79. July 14, 2025 – A meeting occurred between Allison Ginn, Bill Elliott, and Witness 9. (Ex. Vol. 4 p. 63 (Allison Ginn provided a meeting agenda.) The TGC 552.101 / TEC 21.355

. (Ex. Vol. 4 p. 63.) Bill Elliott recalled that Ginn and ^{Witness 9} "butted heads," albeit professionally. (Ex. Vol. 3 p. 6.) Bill Elliott perceives that ^{Witness 9} has a concern that Ginn is trying to get rid of , and Ginn
TCC 552 101 / TEC 21 255

TGC 552.101 / TEC 21.355
Witness 9. (Ex. Vol. 3 p. 6.) Elliott supports Witness 9's handling of
TGC 552.101 / TEC 21.355 in Athletics. (Ex. Vol. 3 p. 6.)

80. July 27, 2025 – Witness 9 emails her TGC 552.101 / TEC 21.355 . (Ex. Vol. 4 p. 12-20.)

Witness 9 's TGC 552.101 / TEC 21.355 . (Ex. Vol. 4 p.
6.)

81. August 11, 2025 - Witness 9 TGC 552.101 / TEC 21.355

82. August 12-13, 2025 - Allison Ginn notifies Witness 30
representative TGC 552.101 / TEC 21.355 that she will have a
TGC 552.101 / TEC 21.355 . (Ex. Vol. 4 p. 59.)

83. August 18, 2025 – Witness 30 emails Allison Ginn to schedule a meeting regarding Witness 9's TGC 552.101 / TEC 21.355. (Ex. Vol. 4 p. 58.) The meeting is scheduled for August 20. *Id.*

84. August 19, 2925 – District Leadership Team meeting occurs and principals receive training on reporting abuse and Misconduct (Legislative update). (Ex. Vol. 6 p. 4-25.)

85. August 20, 2025 – Witness 30 meets with Allison Ginn regarding Witness 9's ^{TGC 552.101 / TEC 21.355} (Ex. Vol. 4 p. 49.) Witness 30 requests additional information from Ginn, including documentation of TGC 552.101 / TEC 21.355 Witness 9. (Ex. Vol. 4 p. 49-50.)

86. August 21, 2025 – Witness 30 sends Allison Ginn a copy of Witness 9's TGC 552.101 / TEC 21.355 (Ex. Vol. 4 p. 53.) Witness 30 reminds Ginn that "Board Policy DIA(Local) is strongly in effect and must be adhered to throughout this process. This policy provides clear guidance on how are to be handled, including strict confidentiality and ensuring that employees are free from retaliation. Please ensure that all actions taken in response to this ^{TGC 552.101 / TEC 21.355} are in alignment with DIA(Local)." *Id.*

87. August 25, 2025 – In response to Witness 30's request for information about Witness 9, Allison Ginn TGC 552.101 / TEC 21.355

Witness 9). (Ex. Vol. 4 p. 50.) Witness 33 should have evaluated Witness 9 for the 2024-25 school year but did not.¹³ (Ex. Vol. 5 p. 189 (Witness 33)).

88. August 26, 2025 – Witness 30 emails Allison Ginn a scanned copy of Witness 9/TGC 552.101 / TEC 21.355 "as requested." (Ex. Vol. 4 p. 42.)

89. September 9, 2025 – Witness 30 , issued a ^{TGC 552.101 / T}

¹³ TGC 552.101 / TEC 21.355

90. October 2, 2025 - Witness 25¹⁴ states

) shared with in the car on the way home from school in the evening that some kids were saying Caleb Elliott was recording in the locker room. (Ex. Vol. 5 p. 147 (Witness 25).) Witness 25 asked — “did you see that? Are you sure you didn’t see anything?” *Id.* denied seeing anything and stated just heard other kids talking about it. *Id.* After Witness 25 and arrived home that evening, Witness 25 called Witness 6 to share this information. *Id.* Witness 6 was driving the bus to another town for a football game. (Ex. Vol. 5 p. 28 (Witness 6).) Witness 25 told Witness 6 something to the effect of, “I want to tell you this.... [] said some of the boys are saying that [Caleb] might be filming them in the locker room.” (Ex. Vol. 5 p. 28 (Witness 6); *see also* Ex. Vol. 5 p. 147 (Witness 25).) Witness 6 stated, “Do you know that or is it just boys talking?” To which Witness 25 responded that it was just talk. (Ex. Vol. 5 p. 28 (Witness 6).) Witness 25 does not recall Witness 6’s exact response to on the phone, but said something like, “OK, I’ll take care of it.” (Ex. Vol. 5 p. 148 (Witness 25).)

91. October 3, 2025 – Witness 6 sent a text message to all coaching staff at 5:41 am, stating: “Coaches, DO NOT have your phones out in the locker room.” (Ex. Vol. 5 p. 150 (Screenshot Oct 3 Text); *see also* Ex. Vol. 5 p. 28 (Witness 6).) During practice, Witness 6 received a text from the ladies who coordinate subs and asked why Caleb Elliott needed a sub for the day. (Ex. Vol. 5 p. 28.) Witness 6 didn’t know but, in retrospect, believes Caleb Elliott was nervous about Witness 6’s early morning text about phones. (Ex. Vol. 5 p. 28.) After practice, Witness 6 stayed in the locker room the entire time. (Ex. Vol. 5 p. 28.) During the day, Witness 6 looked for Allison Ginn to seek guidance on the information Witness 25 had shared, but Ginn was out for the day. (Ex. Vol. 5 p. 28.) When was unable to find Ginn, Witness 6 reported the information to Witness 33 that afternoon. (Ex. Vol. 5 p. 28; *see* Ex. Vol. 5 p. 168 (Witness 33’s statement on the matter).)

92. The information shared by Witness 25, was not a report of misconduct (*i.e.*, it was not a report that Witness 25’s had seen or experienced anything inappropriate), but was information that students were talking about misconduct. Witness 25 and

¹⁴ Witness 25 works . (Ex. Vol. 5 p. 146.) Witness 25
has TGC 552.101 / TEC 21.355

Id. *Id.*
states is TGC 552.101 / TEC 21.355

Id.

^{Witness 6} both took prompt actions after hearing this information. Neither ^{Witness 25} nor ^{Witness 6} heard such information and simply kept it to .

93. October 3, 2025 – CPD arrested Caleb Elliott around 3-4 pm for Invasive Visual Recording, a state jail felony. (Ex. Vol. 7 p. 65 (CPD Update 10-3-25).) CPD also issued a public statement announcing the arrest. *Id.*
94. October 3, 2025 – CISD ^{Witness 30} submitted a notification to the SBEC/TEA that Caleb Elliott allegedly engaged in misconduct in violation of District policy – video and taking pictures of students in the classroom. (Ex. Vol. 1 p. 75-79; *see also* Ex. Vol. 5 p. 99 (Tom Maglisceau).) The report indicates that CISD had no additional information from the CPD at that time. (Ex. Vol. 1 p. 77.)
95. October 3, 2025 – ^{Witness 30} placed Caleb Elliott on administrative leave and notified him that the District released certain information to the TEA and/or SBEC, as required pursuant to a report to those entities under 19 TAC § 249.14. (Ex. Vol. 1 p. 73-74, 80.)
96. October 3, 2025 – The Superintendent informed MMS parents of Caleb Elliott's arrest, and that Caleb would be on administrative leave indefinitely. (Ex. Vol. 7 p. 48, Superintendent Letter 1 to MMS Families (10-3-25).) The Superintendent encouraged parents to speak to their sons and to contact authorities with concerns. Contact information to the CPD Detective and DFPS was provided. The Superintendent provided contact information for the CISD Director of Student Services for additional support.
97. October 5, 2025 – Allison Ginn sends emails to the MMS, as well as separate emails to the football families and Caleb Elliott's 6th Grade History families. (Ex. Vol. 2 p. 12-16.) In the emails, Ginn encourages families to reach out if the students need additional support and requests that families with "any information you believe we need to know," to reach out to MMS administration or the CPD. *Id.* Ginn also linked a two-page "Questions received as of Oct. 5, 2025" to the email sent to all families. *Id.* In the linked document, Ginn provides an email contact to the CPD detective, among other information. *Id.*
98. October 5, 2025 – ^{TGC 552.101 / TEC} Parent 2 emails CPD and copies Allison Ginn:

With the recent events and emails that have been shared, we've taken time as a family to discuss the situation involving Coach Elliott. ^{Student 2} is both shocked and deeply disappointed by what has come to light.

As we process everything, please know that our thoughts and prayers are with all the families affected during this difficult time. ^{Student 2} had always considered Coach Elliott a favorite teacher and would occasionally stop by to chat with him.

In reflecting on their interactions, the only concern that stood out was that Coach Elliott would sometimes sell cologne to ^{TGC 552.101 / TEC 21.355} at school for cash. As a parent, I find this behavior highly inappropriate and concerning. While it may seem minor in comparison to the broader situation, it raised a red flag for us. This kind of action could potentially be an early step in testing boundaries or encouraging secrecy, which is troubling. I share this information with you not to make assumptions, but in the event that it's relevant to the broader investigation.

(Ex. Vol. 1 p. 146.)

99. Parent Parent 1 emails CPD, which then forwards to Allison Ginn, recounting and recalling the situation from March 2025 where Student 1 bought an Apple Watch and bought bottles of cologne from Caleb Elliott. (Ex. Vol. 5 p. 134 (parent email).)
100. October 7, 2025 - The Superintendent sends a letter to MMS parents providing information, informing them of this Investigation (including the name of the Investigator), and communicating formal guidelines to enhance safety of students and staff in locker rooms. (Ex. Vol. 7 p. 49-52, Superintendent Letter 2 to MMS Families (10-7-25).) By providing the Investigator's name to the MMS community, MMS was on notice of how to submit additional information in this Investigation to the Investigator directly. (The Investigator's contact information is readily available online.)
101. October 9, 2025 - CPD arrested Caleb Elliott a second time for Possession or Promotion of Child Pornography, a Felony of the Second Degree. (Ex. Vol. 7 p. 66 (CPD Update 10-9-25).) CPD also issued a public statement announcing the arrest. *Id.* In its statement, CPD alerts parents that, based on the evidence collected at this point, if a child was impacted their parents will be contacted by the Criminal Investigation Division by the end of the day. *Id.* CPD provided a phone number to contact CPD if any CISD parent, child, or former student wished to contact them. *Id.*
102. October 9, 2025 - CISD (Witness 30) submitted an additional notification to the SBEC/TEA that Caleb Elliott was rearrested with additional charges, and a new offense as stated by CPD - Possession or Promotion of Child Pornography, a Felony of the Second Degree. (Ex. Vol. 1 p. 81-87.)
103. October 9, 2025 - The Superintendent sent a letter to the CISD community informing them of Caleb Elliott's second arrest and this Investigation. (Ex. Vol. 7 p. 53, Superintendent Letter 3 to CISD (10-9-25).) By providing the Investigator's name to the CISD community, which ultimately was released to the media, the

public was on notice of how to submit additional information in this Investigation to the Investigator directly. (The Investigator's contact information is readily available online.) Other than media requests, the Investigator did not receive any contact as a result of the Superintendent's communication(s).

104. October 9, 2025 - On or about this date, Allison Ginn begins collecting numerous screenshots of Instagram photos from CHS Athletics (reflecting what Ginn called misbehavior and inappropriate videos taken inside the locker room) to send to ^{Non-Witness 11} . (Ex. Vol. 2 p. 5, 22-33, 36.) Ginn texted a screenshot to ^{Non-Witness 11}, and responds, "I don't have [Instagram] What does it say." (Ex. Vol. 2 p. 35.) Ginn responds, "This video is from inside locker room and this kid is fucking the alien with some grotesque song." (Ex. Vol. 2 p. 36; Ex. Vol. 5 p. 222 (Ginn stating that ^{Non-Witness 1} wasn't "getting it," so she used profanity in the message).) Ginn continues sending similar screenshots to ^{Non-Witness 11} until at least October 11, 2025. *Id.* **TGC 552.101 / TEC 21.355**

TGC 552.101 / TEC 21.355

This ^{TGC 552.101 / TEC 21.355} reflects poorly on ^{TGC 552.101 / TEC 21.355}, MMS, and the District as a whole.

105. October 13, 2025 - Caleb Elliott signs a Settlement Agreement and Release agreeing, *inter alia*, to resign and voluntarily surrender/relinquish his teaching certificate with the TEA/SBEC, effective immediately. (Ex. Vol. 1 p. 62-72; Ex. Vol. 5 p. 54 (^{Witness 10} describing this forced resignation as a termination); Ex. Vol. 5 p. 59 (^{Witness 11} describing same); Ex. Vol. 5 p. 72 (^{Witness 13} describing same); Ex. Vol. 5 p. 99 (Tom Maglisceau describing that did not want to accept a resignation because of optics and the egregiousness of this situation, but that is familiar with how long a formal termination process could take).) Tom Maglisceau describes that this (the resignation and surrender of the teaching certificate) was the quickest process to ensure that Caleb Elliott would never work in education again. (Ex. Vol. 5 p. 99.)

106. October 14, 2025 - CISD (^{Witness 30}) submitted an additional notification to the SBEC/TEA that Caleb Elliott resigned and agreed to surrender his teaching certificate to TEA. (Ex. Vol. 1 p. 88-92.)

107. In October 2025, and after a tragedy within the football program unrelated to Caleb Elliott, Bill Elliott cancelled a JV football game without notice or approval from anyone. (Ex. Vol. 5 p. 102 (Tom Maglisceau describing how counselors had different ideas about the best way to proceed in a way to support the students after the loss of a classmate.) Bill Elliott also made efforts to schedule a candlelight vigil at 6 pm (at exact time the regular October Board Meeting was scheduled, where families were expected to be present to speak publicly to the Board about Caleb Elliott's arrest). (Ex. Vol. 5 p. 102 (Tom Maglisceau recognizing that Bill Elliott has good intentions, but does not follow basic processes.) Operating in such a unilateral fashion reflects **TGC 552.101 / TEC 21.355** of the bigger picture in a growing school district.

108. October 16, 2025 – At the regularly scheduled school board meeting, Bill Elliott made remarks during public comment. Bill Elliott did not address the Board, but instead turned his back to the Board and spoke to the public about, *inter alia*, Caleb Elliott.¹⁶ (See generally [Board Meeting Video](#) (10-16-25) at 24:30; Ex. Vol. 5 p. 104 (Tom Maglisceau).) Turning his back on the Board may create a perception (whether founded or not) that the Board is subordinate to Bill Elliott or his position. (E.g., Ex. Vol. 3 p. 78-79 (email from community member to the Board after this meeting, "It's apparently not just Mr. Elliott that believes he doesn't report to anyone, you all must believe that too or are too scared to confront him.").)

109. October 17, 2025 – Allison Ginn began reaching out to **Witness 32** to request a meeting including **Non-Witness 12**. (Ex. Vol. 2 p. 17-18; Ex. Vol. 5 p. 169-170.) The topic of the requested meeting included issues which touch upon—and may threaten to interfere with—this investigation (i.e., Athletics and **Witness 9**). On this day, Allison Ginn also requested Bill Elliott that he stay away from the campus unless an administrator was present. (Ex. Vol. 2 p. 20; Ex. Vol. 5 p. 67-68 (**Witness 12** **TGC 552.101 / TEC 21.355**).

"Public Comment" is an opportunity for members of the public to "address comments on any subject to the governmental body." Office of the Attorney General, *Open Meetings Act Handbook 2026*, p. 47 (emphasis added).

110. On various dates after Caleb Elliott's initial arrest - Allison Ginn sent a number of **TGC 552.101 / TEC 21.355** messages to subordinates regarding the situation:

- To ^{Non-Witness 13} - "They keep thinking that we ([^{Witness 6}] and I) knew of some prior video recording or sent an apology letter. I legit have no idea what they are talking about and neither does ^{Witness 6}. Plus, I would lose my own job and cert if I knew any of that and didn't alert the police... Honestly [Bill Elliott] needs to take a leave of absence. He is too close to it all[.]" (Ex. Vol. 2 p. 58; *see also* Ex. Vol. 5 p. 174 (reflecting ^{Non-Witness 13} is a).)
- To 8 people, including ^{Witness 35} - "I just spoke to ^{Witness 29}, is cooperating with Celina PD and was unaware of this. is really struggling. I may have one of yall reach out tomorrow to check on ^{TGC 552.101 / TEC 21.355} but is going to stay with [sic] tonight. does ^{TGC 552.101 / TEC 21.355} " (Ex. Vol. 2 p. 65.)
- To 2 recipients including ^{Non-Witness 14}, and separately to ^{Non-Witness 15} [no last name] - "I just spoke to ^{Witness 29} (), ^{TGC 552.101 / TEC 21.355}. is very upset, but has been cooperating with police all afternoon and evening. is completely unaware of this and is very upset and blindsided. will be ^{TGC 552.101 / TEC 21.355} this weekend. ^{TGC 552.101 / TEC 21.355} I told I would check on tomorrow and let my counselors know too." (Ex. Vol. 2 p. 67, 69.)
- To ^{Witness 14} (referring to Gregg Gibbs, who Ginn had heard was representing Caleb Elliott) - "Just that they wouldn't choose someone with no Celina ties. I would have chosen the biggest badass but also, they may not have the money . . . I would embarrassed to have someone from my school defend my son who is beyond guilty . . . Like there is no talking your way out of it . . . I seriously think Bill thinks he is innocent or he must be an idiot. One or the other." (Ex. Vol. 2 p. 79.) ^{Witness 14} recalled that was "trying not to engage," in this text message discussion, and responses reflect that. (Ex. Vol. 5 p. 220; *see also* Ex. Vol. 5 p. 77 (^{TGC 552.} ^{Witness 14} statement).)
- To ^{Witness 23} - "Dr Tom just told me not to engage in anymore convos at this point with ^{Witness 29} and/or family of CE some things are still being

reported. said knows we are coming from a good place but that we have to be careful." (Ex. Vol. 2 p. 81.)

Ginn's remarks about the situation involving Caleb Elliott, including her remarks about Bill Elliott, are **TGC 552.101 / TEC 21.355**

111. October 23, 2025 – The District requests that allegations in the Doe I lawsuit filed against the District be added to the investigation. Twelve minor plaintiffs are listed in this suit.
112. October 24, 2025 – The Superintendent sent a letter to CISD Parents updating them with information about the CPD investigation and this Investigation. (Ex. Vol. 7 p. 54-61, Superintendent Letters 4, 5, 7 October 24, 2025.) The Superintendent also sent a letter to MMS Families notifying them of Ginn's placement on non-disciplinary leave and the campus plan in her absence. *Id.* The Superintendent also sent a letter to Football Families notifying them of Bill Elliott's placement on non-disciplinary leave and the plan for football in his absence. *Id.* The Superintendent also sent a letter to CPD regarding the District's request that CPD continue full investigation of ancillary criminal matters as CPD determines necessary. *Id.* The Superintendent also sent a letter to the Office of the Attorney General updating that office about this Investigation and the request to CPD to continue its investigation. *Id.*
113. October 27, 2025 – CISD (Witness 30) submitted an additional notification to the SBEC/TEA that Caleb Elliott was "alleged to have a current relationship with Witness 29 , a former student whom Caleb Elliott taught during the 2022-23 school year." (Ex. Vol. 1 p. 93-94.)
114. October 27, 2025 – CPD issued a public Case Update, informing the public of its ongoing investigation and commitment to pursuing leads. (Ex. Vol. 7 p. 67 (CPD Update 10-27-25).)
115. October 27, 2025 – TEA's records indicate that, at least as of this date, Caleb Elliott's teaching certification has been surrendered and his name appears on the Public Registry Search for individuals not eligible to be employed by a public school district in any role. (Ex. Vol. 1 p. 103-105.)
116. October 29, 2025 – The Superintendent sent an additional communication to the CISD Community. (Ex. Vol. 7 p. 63, Superintendent Letter 9 to CISD (10-9-25).)

117. October 30, 2025 – The District requests that allegations in the Roe I lawsuit filed against the District be added to the investigation. Three minor plaintiffs are listed in this suit.

118. November 7, 2025 – At the request of the Investigator, ^{Witness 15} sends an email to all MMS staff and all CISD Athletics staff, directing them to contact the Investigator directly if they have any information relevant to the investigation. (Ex. Vol 7 p. 16-23.) One person (^{Witness 27}) contacted the Investigator as a result of this effort. (Ex. Vol. 6 p. 152.)

119. November 29, 2025 – CISD (^{Witness 30}) submitted an additional notification to the SBEC/TEA that although Caleb Elliott is no longer employed at the District, CISD is providing notice that it learned that Caleb Elliott was arrested on an additional charge of Sexual Performance of a Child, a Felony of the Second Degree. (Ex. Vol. 1 p. 95-99; *see also id.* p. 100-102.)

120. December 1, 2025 - The District requests that allegations in the Johnny Does I lawsuit filed against the District be added to the investigation. Two minor plaintiffs are listed in this suit.

121. December 3, 2025 - The District requests that allegations in the Johnny Does II lawsuit filed against the District be added to the investigation. Seventeen minor plaintiffs are listed in this suit.

122. December 5, 2025 – The District's S'More Letter, sent to all District employees, notifies all CISD employee of mandatory training focused on protecting and supporting students. (Ex. Vol. 6 p. 4, 31.)

123. December 11, 2025 – The Investigator follows up with 22 witnesses to determine knowledge of newly raised allegations in Johnny Does II. (Ex. Vol 7 p. 16, 24.) No witness reported having any knowledge of the new allegations. (Ex. Vol. 7 p. 25-46.)

Other Findings of Fact – Knowledge of Concerns About Caleb Elliott

124. No witness reported knowledge of Caleb Elliott's relationship with ^{Witness 29} before October/Fall 2024.

125. No witness reported knowledge that an inappropriate relationship involving Caleb Elliott began while ^{Witness 29} ^{TGC 552.101 / TEC 21.355}. (E.g., Ex. Vol. 3 p. 4 (Bill Elliott stating that after his arrest, Caleb shared that he met ^{Witness 29} online in the summer of 2024 and the two went to an aquarium together); Ex. Vol. 2 p. 5 (Allison Ginn); Ex. Vol. 5 p. 8 (^{Witness 2}); Ex. Vol. 5 p. 21 (^{Witness 5}); Ex. Vol. 5 p. 26 (^{Witness 6}); Ex. Vol. 5 p. 39 (^{Witness 7}); Ex. Vol. 5

p. 46 (Witness 8 describing that was a ^{TGC 552.101 / TEC 21.355} during the timeframe of this alleged conduct, and never heard any such thing from or the other moms); Ex. Vol. 5 p. 59 (Witness 11 describing that) told about a year and a half ago that Caleb Elliott was on a gay dating website, but did not share any rumor that Caleb Elliott was in a relationship with a ^{TGC 552.101 / TEC 21.355}); Ex. Vol. 5 p. 64, 224 (Witness 12); Ex. Vol. 5 p. 72 (Witness 13 describing seeing Caleb Elliott and his significant other ^{Witness 29} about a year ago (fall 2024) while ^{Witness 29} was working at Tractor Supply in the middle of the day—so had reason to believe that ^{Witness 29} was not a student because was not at school); Ex. Vol. 5 p. 96 (Witness 17); Ex. Vol. 5 p. 99 (Tom Maglisceau); Ex. Vol. 5 p. 115 (Witness 19); Ex. Vol. 5 p. 121 (Witness 20) () stating taught ^{Witness 29} while ^{TGC 552.101 / TEC 21.355} and never heard of any connection between Caleb Elliott and ^{Witness 29} while ^{Witness 29} ^{TGC 552.101 / TEC}; Ex. Vol. 5 p. 125 (Witness 21 , who has two , stating never heard anything like this from kids or other moms); Ex. Vol. 5 p. 129 (Witness 22); Ex. Vol. 5 p. 161 (Witness 29 denying the allegation); Ex. Vol. 5 p. 187, 224 (Witness 33); Ex. Vol. 5 p. 195 (Witness 26); Ex. Vol. 5 p. 205 (Witness 35); Ex. Vol. 5 p. 211 (Witness 36); Ex. Vol. 5 p. 216 (Witness 37 , who is the ^{TGC 552.101 / TEC} of a as ^{Witness 29}).)

126. Few witnesses reported hearing a rumored assumption in the October 2024 time frame that ^{Witness 29} and Caleb Elliott *met* while Caleb Elliott was subbing at CHS, but had never heard that the two had any relationship while ^{Witness 29} ^{TGC 552.101 / TEC 21.355}. (E.g., Ex. Vol. 5 p. 80 (Witness 14); Ex. Vol. 5 p. 179 (Witness 31); see also Ex. Vol. 5 p. 64 (Witness 12 ^{TGC 552.101 / TEC 21.355}).)

.) Only one witness described that might have heard a rumor in the fall 2024 along the lines of an “improper relationship with a then-senior of the high school,” but can’t be sure and has no knowledge that Caleb Elliott groomed or dated any high school student. (Ex. Vol. 5 p. 143 (Witness 24 (

))). No other witness even heard a rumor that there was any relationship between Caleb Elliott and ^{Witness 29} while ^{Witness 29} was in ^{TGC 552.101 / TEC 21.355}

127. No evidence suggests Caleb Elliott was hired at (or moved to) MMS in the spring/summer of 2023 due to (or with any knowledge of) any improper or

unlawful relationship. (E.g., Ex. Vol. 2 p. 4 (Allison Ginn describing the circumstances surrounding Caleb Elliott's hire); Ex. Vol. 3 p. 4 (Bill Elliott); Ex. Vol. 5 p. 8 (Witness 2); Ex. Vol. 5 p. 21 (Witness 5); Ex. Vol. 5 p. 26 (Witness 6); Ex. Vol. 5 p. 80 (Witness 14); Ex. Vol. 5 p. 99 (Tom Maglisceau); Ex. Vol. 5 p. 129 (Witness 22); (Ex. Vol. 5 p. 143 (Witness 24); Ex. Vol. 5 p. 183 (Witness 32); Ex. Vol. 5 p. 187 (Witness 33); Ex. Vol. 5 p. 195 (Witness 26); Ex. Vol. 5 p. 216 (Witness 37), who is the

.) Caleb Elliott was not employed by CISD full time until the 2023-24 school year as fully described herein, *supra*. Caleb Elliott was not "moved" to MMS; moreover, the Investigation revealed no evidence of a) an improper or unlawful relationship, and/or b) any witness having knowledge of such a relationship.

128. No witness reported seeing or hearing anything inappropriate about Caleb Elliott's behavior in the locker room before October 2, 2025 (when Witness 25 's reported to the kids talking about Caleb Elliott). (E.g., Ex. Vol. 5 p. 27 (Witness 6 stating same and that cannot recall seeing Caleb Elliott using his phone in the locker room a single time); Ex. Vol. 5 p. 40 (Witness 7 recalling that although did not have duty in the 8th grade locker room with Caleb Elliott, there was nothing saw or heard about Caleb Elliott caused concern about his behavior); Ex. Vol. 5 p. 96 (Witness 17); Ex. Vol. 5 p. 115 (Witness 19); Ex. Vol. 5 p. 187 (Witness 33).)

129. No witness has any knowledge that Caleb Elliott ever installed or placed cameras in the 2024-25 school year (or at any other time). (E.g., Ex. Vol. 2 p. 6 (Allison Ginn); Ex. Vol. 3 p. 4 (Bill Elliott); Ex. Vol. 4 p. 5 (Witness 9); Ex. Vol. 5 p. 8 (Witness 2); Ex. Vol. 5 p. 21 (Witness 5); Ex. Vol. 5 p. 27 (Witness 6); Ex. Vol. 5 p. 40 (Witness 7); Ex. Vol. 5 p. 65 (Witness 12); Ex. Vol. 5 p. 80 (Witness 14); Ex. Vol. 5 p. 96 (Witness 17); Ex. Vol. 5 p. 99 (Tom Maglisceau); Ex. Vol. 5 p. 116 (Witness 19); Ex. Vol. 5 p. 130 (Witness 22); Ex. Vol. 5 p. 138 (Witness 23 (Witness 23)); Ex. Vol. 5 p. 143 (Witness 24 , who had during this time period); Ex. Vol. 5 p. 147 (Witness 25 stating that if had heard such a thing, would have raised it to others because and is in the locker room); Ex. Vol. 5 p. 179 (Witness 31

, who has , stating never heard this and disbelieves that this could have occurred because people in Celina would have been talking about that); Ex. Vol. 5 p. 184 (Witness 32); Ex. Vol. 5 p. 188 (Witness 33); Ex. Vol. 5 p. 199 (Witness 34 , whose during the 2024-25 year but did not play football); Ex. Vol. 5 p. 205 (Witness 35 stating never heard this in role or as a part of "mom" group chats related

in CISD); Ex. Vol. 5 p. 211 (Witness 36 stating that has no knowledge; and after Caleb Elliott's arrest, ^{Witness 36} accompanied CPD to the locker room to conduct a thorough check for cameras but found nothing); Ex. Vol. 7 p. 14 (CISD Police Chief Proffer).) No witness reported even hearing a rumor about this allegation before Caleb Elliott's arrest.

130. No witness has any knowledge that the District (or any District employee) sent apology letters related to Caleb Elliott to any parents or students in the 2024-25 school year (or at any other time). (Ex. Vol. 2 p. 6 (Allison Ginn); Ex. Vol. 3 p. 4 (Bill Elliott); Ex. Vol. 4 p. 5 (Witness 9); Ex. Vol. 5 p. 9 (Witness 2); Ex. Vol. 5 p. 22 (Witness 5); Ex. Vol. 5 p. 28 (Witness 6); Ex. Vol. 5 p. 40-41 (Witness 7); Ex. Vol. 5 p. 65 (Witness 12); Ex. Vol. 5 p. 80 (Witness 14); Ex. Vol. 5 p. 87, 89 (Witness 15 stating that has no knowledge of apology letters, and Human Resources conducted a search for such letters); Ex. Vol. 5 p. 96 (Witness 17); Ex. Vol. 5 p. 99 (Tom Maglisceau); Ex. Vol. 5 p. 116 (Witness 19); Ex. Vol. 5 p. 130 (Witness 22); Ex. Vol. 5 p. 143 (Witness 24 , stating searched emails for an apology since – but found nothing); Ex. Vol. 5 p. 179 (Witness 31); Ex. Vol. 5 p. 184 (Witness 32); Ex. Vol. 5 p. 188 (Witness 33); Ex. Vol. 5 p. 205 (Witness 35); Ex. Vol. 5 p. 211 (Witness 36); Ex. Vol. 5 p. 215 (Witness 37 , who manages emails to and from).) No witness reports even hearing a rumor about this allegation before Caleb Elliott's arrest.

131. Witness 6 (and others) will assign burpees from time to time as discipline—like if a student does not sign in or if the student brings a backpack into the locker room. (Ex. Vol. 5 p. 28 (Witness 6); Ex. Vol. 5 p. 41 (Witness 7).) ^{Witness 6} did not recall Caleb Elliott ever assigning burpees. (Ex. Vol. 5 p. 28 (Witness 6).) ^{Witness 6} states that Caleb Elliott would come to (Witness 6) for help dealing with misbehavior. *Id.* ^{Witness 6} would assign burpees, but would not monitor to see if the burpees got done and burpees would happen while the boys were clothed. *Id.*

132. No witness has any knowledge that Caleb Elliott (or any other coach) made students do exercises (like jumping jacks or burpees) naked. (E.g., Ex. Vol. 2 p. 6 (Allison Ginn); Ex. Vol. 3 p. 5 (Bill Elliott); Ex. Vol. 4 p. 5 (Witness 9); Ex. Vol. 5 p. 8 (Witness 2); Ex. Vol. 5 p. 21 (Witness 5); Ex. Vol. 5 p. 28 (Witness 6); Ex. Vol. 5 p. 41 (Witness 7); Ex. Vol. 5 p. 96 (Witness 17); Ex. Vol. 5 p. 99 (Tom Maglisceau); Ex. Vol. 5 p. 116 (Witness 19); Ex. Vol. 5 p. 130 (Witness 22); Ex. Vol. 5 p. 138 (Witness 23) () describing that coaches do seek counseling checks for athletes, but never received any information or requests to counsel kids due to Caleb Elliott); Ex. Vol. 5 p. 147 (Witness 25); Ex.

Vol. 5 p. 184 (Witness 32); Ex. Vol. 5 p. 188 (Witness 33); Ex. Vol. 5 p. 206 (Witness 35); *see also*, e.g., Ex. Vol. 5 p. 46 (Witness 8) describing that after this arose, asked if the coaches ever did anything weird or to make uncomfortable and said emphatically no.) No witness reports even hearing a rumor about this allegation before Caleb Elliott's arrest.

133. No witness has any knowledge about a Celina ISD employee who allegedly reported inappropriate behavior by Caleb Elliott toward children, was told the report was not true, and subsequently left the District. (Ex. Vol 7 p. 16, 24 (Memo of Investigation Event and follow up email to witnesses); Ex. Vol. 5 p. 100 (Tom Maglisceau); Ex. Vol. 5 p. 121 (Witness 20); Ex. Vol. 5 p. 143 (Witness 24 stating has "thought and thought" about what this allegation could be referring to and does not know); Ex. Vol. 5 p. 180 (Witness 31); Ex. Vol. 5 p. 221 (Allison Ginn stating she never received a report about Caleb Elliott).)

134. No witness has any knowledge about a confrontation between Caleb Elliott and another coach (or staff member) in relation to previous attempts to record children. (Ex. Vol 7 p. 16, 24 (Memo of Investigation Event and follow up email to witnesses); Ex. Vol. 5 p. 121 (Witness 20); Ex. Vol. 5 p. 144 (Witness 24 stating does not know about this and has never heard about any such thing from , who were); Ex. Vol. 5 p. 180 (Witness 31); Ex. Vol. 5 p. 221 (Allison Ginn stating she would have been made aware of such an "uproar," but was not.) No witness reports even hearing a rumor about this allegation while Caleb Elliott was employed.

135. Concerns about Caleb Elliott before October 2, 2025 (when Witness 25 's reported to the kids talking about Caleb Elliott):

- a. Caleb Elliott selling a watch to a student (*supra*, Paragraphs 64-68);
- b. Selling cologne to students (*supra*, Paragraph 69);
- c. Classroom management issues (*supra* Paragraph 44);
- d. Caleb Elliott was moved out of the locker room in the 2024-25 school year (*supra* Paragraph 58; *see also* Ex. Vol. 5 p. 125 (Witness 16 describing parent "rumbling" wondering if Caleb Elliott should be in the locker room due to his sexual orientation));
- e. Caleb Elliott may have used a fake excuse to take a day off of work (Ex. Vol. 5 p. 29 (Witness 6));

- f. Caleb Elliott mentioned in a conversation among adults (no students) that **TGC 552.101 / TEC 21.355** (Ex. Vol. 5 p. 96 (Witness 17));
- g. Caleb Elliott seemed disheveled and unkempt after he came out as gay (Ex. Vol. 5 p. 93 (Witness 16));
- h. Caleb Elliott ^{TGC 552.101 / TEC 21.355} after he came out as gay (Ex. Vol. 5 p. 40 (Witness 7));
- i. Caleb Elliott would leave school immediately, and was one of the first teachers gone each day (Ex. Vol. 5 p. 9 (Witness 2));
- j. Caleb Elliott had a hole in the knee of his sweatpants and looked like he hadn't washed well (Ex. Vol. 5 p. 190 (Witness 33));
- k. Caleb Elliott seemed immature, and more like a kid than a teacher; for example, he came to a pep rally in disheveled dress and had his zipper undone like he got dressed in a hurry (Ex. Vol. 5 p. 194 (Witness 26));
- l. Allison Ginn mentioned to ^{Witness 12} that she cautioned Caleb Elliott and ^{Witness 29} from sitting together at a meeting after ^{Witness 29} was hired as (Ex. Vol. 5 p. 64 (Witness 12));

No other concerns were shared by any witness. (E.g., Ex. Vol. 2 p. 6 (Allison Ginn); Ex. Vol. 3 p. 4 (Bill Elliott); Ex. Vol. 4 p. 5 (Witness 9)); Ex. Vol. 5 p. 3 (Witness 1); Ex. Vol. 5 p. 8 (Witness 2); Ex. Vol. 5 p. 54 (Witness 10) stating that no one brought concerns about Caleb Elliott to the School Board before his arrest); Ex. Vol. 5 p. 88 (Witness 15) stating goes to board meetings and has not heard any concern raised at a board meeting about Caleb Elliott before his arrest); Ex. Vol. 5 p. 96 (Witness 17) stating there was nothing about Caleb Elliott's behavior that would strike him as odd, and he never acted "weird or like he's trying to hide something"); Ex. Vol. 5 p. 144 (Witness 24) stating she never brought a concern about Caleb Elliott to the school board, even in a casual conversation around town); Ex. Vol. 5 p. 121 (Witness 20); Ex. Vol. 5 p. 153 (Witness 27); Ex. Vol. 5 p. 206 (Witness 35) stating students report to the counselors "a lot," but there were never any reports about Caleb Elliott before his arrest.)

136. Before Caleb Elliott's arrest, he was widely considered (by those with knowledge of his work as a teacher/coach) to be an adequate or good teacher/coach who was popular with students. (Ex. Vol. 1 p. 146 (email from parent October 5, 2025); Ex. Vol. 2 p. 5 (Allison Ginn); Ex. Vol. 5 p. 9 (Witness 2));

Ex. Vol. 5 p. 59 (Witness 11) describing impression seeing Caleb Elliott on the sidelines); Ex. Vol. 5 p. 96 (Witness 17) describing Caleb Elliott as "always positive, never weird"); Ex. Vol. 5 p. 116 (Witness 19); Ex. Vol. 5 p. 138 (Witness 23)

stating that no one came to her with a concern about Caleb Elliott or to have their child removed from his class, and in fact some kids considered Caleb Elliott to be their favorite teacher); Ex. Vol. 5 p. 180 (Witness 31 describing that

saw him interacting with kids regularly, and the students liked and respected him); Ex. Vol. 5 p. 184 (Witness 32); Ex. Vol. 5 p. 199 (Witness 34 describing

that [REDACTED] had Elliott as a teacher last year, and to Witness 34's knowledge most kids really loved him and are sad he's gone); *see also* Ex. Vol. 5 p. 120 (Witness 20

(MMS teacher) describing that she had Caleb Elliott as a student and emailed his parents to compliment their parenting because Caleb was such a good

137. Many witnesses expressed shock, disbelief, and/or being blindsided by the situation giving rise to Caleb Elliott's arrest. (E.g., Ex. Vol. 5 p. 48 (Witness 8); Ex. Vol. 5 p. 116 (Witness 19); Ex. Vol. 5 p. 120 (Witness 20); Ex. Vol. 5 p. 125 (Witness 21); Ex. Vol. 5 p. 180 (Witness 31); Ex. Vol. 5 p. 195 (Witness 26

).) No witness expressed a feeling of being "not surprised," by this conduct or anything similar. That said, no witness attempted to deny or discredit the student reports made leading to Caleb Elliott's arrests — *e.g.*, the invasive visual recording. (E.g., Ex. Vol. 5 p. 223 (Ginn stating she believes Caleb Elliott did take the photos).)

Other Findings of Fact - MMS Locker Room Generally

138. There are two boys' locker rooms at MMS—one for seventh grade and one for eighth grade. (See generally Ex. Vol. 5 p. 115 (Witness 19)); Ex. Vol. 7 p. 5-10 (photos of locker rooms.) Signs are posted in the locker room areas prohibiting cell phone or camera use. (E.g., Ex. Vol. 7 p. 9.)

139. 2025-26 school year until October 3, 2025 - Athletics is first period at MMS; workouts (football practice, for example) end between 8:25-30, and students are released from the locker room (after getting dressed) to the cafeteria to eat breakfast until around 9:25 each day. (Ex. Vol. 5 p. 24; Ex. Vol. 5 p. 39 (^{Witness 7}); Ex. Vol. 5 p. 115 (^{Witness 19})).) Before Caleb Elliott's arrest, there would be two coaches assigned to the seventh grade locker room, and two coaches assigned to the 8th grade locker room. (Ex. Vol. 5 p. 27; Ex. Vol. 5 p. 115 (^{Witness 19})).)

140. Witness 25 does not work in (or supervise) the locker room after practice because as , has a ^{TGC 552.101 / TEC 21.355} . (Ex. Vol. 5 p. 147 (Witness 25).)

141. Although it was the goal that there be two coaches supervising in the locker room whenever possible, the coaches would also be taking turns showering and getting ready for their own classes using a separate coaches' restroom. (Ex. Vol. 5 p. 27; *see also* Ex. Vol. 5 p. 39 (Witness 7); Ex. Vol. 5 p. 115 (Witness 19 stating that it is the goal for two coaches to be in the locker room, but sometimes that is not possible if a coach gets called away to deal with a student); Ex. Vol. 5 p. 184 (Witness 32).) Coaches spend time rotating through the locker rooms, keeping kids moving in and out of the locker room to get to class. (Ex. Vol. 5 p. 115 (Witness 19); *see also* Ex. Vol. 5 p. 40 (Witness 7) describing that there's no way to "park it" in the locker room, coaches are constantly wading through students shouting at them to stay on task and get to class.) The coaches also supervise the students to ensure they are not misbehaving or wasting time. (Ex. Vol. 5 p. 115 (Witness 19).)

142. The 8th grade locker room was primarily supervised by Witness 6 and Caleb Elliott. (Ex. Vol. 5 p. 115 (Witness 19).) Witness 6 would monitor the locker room when Caleb Elliott would go take his own shower. (Ex. Vol. 5 p. 27.) Caleb Elliott would be alone supervising the locker room for limited periods if Witness 6 was called to help a student with something in the coaches' office. (Ex. Vol. 5 p. 27.)

143. Witness 6 's expectation is that coaches do not linger in the coaches' office, but that they are supervising students in the locker room. (Ex. Vol. 5 p. 115 (Witness 19) describing that this was the expectation at all times, in experience, but has been documented in a written policy since Caleb Elliott's arrest.)

Other Findings of Fact - Hiring & Qualifications

144. For teachers—applications are submitted through TexEd. (E.g., Ex. Vol. 2 p. 3.) The principal and HR look through applications for qualified candidates. *Id.* Certified candidates are preferred over those who are not yet certified or in an alternative certification program. *Id.* Allison Ginn prefers teachers with experience in certain comparable districts over those without comparable experience. *Id.*

145. Athletics, and Bill Elliott and Witness 6 in particular, exert some level of control over the hiring process for coaches at MMS. (Ex. Vol. 2 p. 3; *but see* Ex. Vol. 3 p. 8 (Bill Elliott describing that Ginn hired coaches notwithstanding

Witness 9's concerns about the candidates); Ex. Vol. 5 p. 8 (Witness 2 describing that "coaching must be approved over the content side, and it can be a challenge to find someone fit for both sides" and that Bill Elliott had final authority on hiring Caleb Elliott because of coaching).)

146. There appears to be no requirement that coaching positions be posted, and Bill Elliott exercises authority to move coaches into open positions. (Ex. Vol. 3 p. 3; Ex. Vol. 5 p. 63 (Witness 12 describing disappointment that Bill Elliott moved a ^{TGC 552.101 / TEC 21.355} to a different ^{TGC 552.101 / TEC 21.355} position because the position could have been posted to ensure the very best candidate is chosen for the job); Ex. Vol. 5 p. 100 (Tom Maglisceau discussing same).)

147. Some witnesses perceive that Athletics controls hiring of coaches to maintain loyalty to Bill Elliott. (E.g., Ex. Vol. 2 p. 4 (Allison Ginn); Ex. Vol. 5 p. 100 (Tom Maglisceau describing that this preference is fine, so long as candidates are rigorously vetted and the principal has the final say).) Bill Elliott does prefer to hire former students as teachers and coaches because they understand "Celina culture and tradition." (Ex. Vol. 3 p. 3.)

148. The familial relationships in Athletics create a perception (whether founded or not) that Athletics is allowed to do things that others in the District are not. For example, there is a perception that principals at CISD were not allowed by the District to hire family members to work with them, but Bill Elliott is allowed to hire both of his sons to coach. (E.g., Ex. Vol. 5 p. 8.) As an additional example, in a ^{TGC 552.101 / TEC 21.355} against Non-Witness 16, the parent alleged that ^{Non-Witness 16} was receiving special treatment because of who ^{TGC 552.101 / TEC 21.355} was (i.e., ^{Non-Witness 16}). (Ex. Vol. 5 p. 104 (Tom Maglisceau).) Whether Bill Elliott or Non-Witness 16 are receiving special treatment or not, these are examples of the perceptions that can arise from the family relationships which reflect poorly on Athletics, and the District as a whole.

149. The familial relationships in Athletics create a perception (whether founded or not) of a lack of accountability.¹⁷ Bill Elliott currently, or has in the past, evaluated members of his family – Non-Witness 17 and Non-Witness 18.¹⁸ (Ex. Vol. 3

¹⁷ Bill Elliott recognizes that if someone had a concern about Non-Witness 17, they may feel nervous to approach him with that concern. (Ex. Vol. 3 p. 5.) Bill Elliott hopes that people would go to ^{Witness 32} with concerns, and that has happened before. (Ex. Vol. 3 p. 5.)

¹⁸ Non-Witness 18 was ^{TGC 552.101 / TEC 21.355} and did not meet ^{Non-Witness 17} until ^{Non-Witness 17} moved to Celina. (Ex. Vol. 3 p. 8.) In other words, ^{Non-Witness 17} was not a family member when ^{Non-Witness 17} was hired.

p. 5; *see also* Ex. Vol. 3 p. 30-32 (^{Non-Witness 18} Evaluation 2023-24), 39-56 (^{Non-Witness 17}

Evaluations 2022-2025).) Bill Elliott states he does this in conjunction with Witness 32 , in hopes to avoid a perception that his family is somehow favored—but recognizes that people might think that there is a preferential treatment. (Ex. Vol. 3 p. 5.) Whether Bill Elliott's family members are receiving special treatment in evaluations or not, these are examples of the perceptions that can arise from the family relationships and which reflect poorly on Athletics, and the District as a whole.

150. Bill Elliott does not have an administrator's certification. (Ex. Vol. 3 p. 28-29.) Witness 32 , does have an administrator's (*i.e.*, principal's) certification. An administrator certification would be expected for an athletic director on an administrator's contract and in a district of Celina's current size.¹⁹ (See Ex. Vol. 5 p. 86 (^{Witness 15} describing experience in other districts that an AD generally carries an administrator's certification); Ex. Vol. 5 p. 101 (Tom Maglisceau).) Preparation for an administrator's certification provides experience and training in finances, interviewing, supervising, and managing others. (Ex. Vol. 5 p. 86; *see also* TExESTest.org Principal as Instructional Leader Exam In <https://texestest.org/texes/principal-as-instructional-leader-268/> (describing the areas of Principal Standards tested for an administrator certification, including Instructional Leadership, Human Capital, Executive Leadership, School Culture, and Strategic Operations).) TGC 552.101 / TEC 21.355

Other Findings of Fact – Training Records & District Policy

151. District records reflect that the CISD employee witnesses identified in this Report (specifically including those at MMS who would have come into contact with Caleb Elliott) were trained annually in Child Abuse Identification and Prevention among other training areas during the relevant period (2023-24 through 2025-26). (Ex. Vol. 6 p. 46-79 (including training in Adult Sexual Misconduct for the 2024-25 school year).)

¹⁹ According to the Superintendent, TGC 552.101 / TEC 21.355 “ ” Non-Witness 3 and ” Non-Witness 19 , neither of whom have that official title through our human resources department, both do not have administrative credentials, which CISD requires for a ^{TGC 552.101 / TEC 21.355} position. (Ex. Vol. 5 p. 101 (Tom Maglisceau).) Witness 32 , does have administrative credentials. *Id.*

152. The District informs all employees of their duties attendant to reporting child abuse and/or neglect. (See, e.g., Ex. Vol. 7 p. 118-120 (CISD Handbook discussing identification and reporting abuse, neglect, sexual abuse and maltreatment of children); Ex. Vol. 7 p. 206-221 (Board Policy FFG(Legal) and FFG(Local) (outlining, *inter alia*, consequences of failure to report).) CISD Policy prohibits physical mistreatment, neglect, and abuse of students and minors. (E.g., Ex. Vol. 7 p. 180-81 (DH(Exhibit))).)

Other Findings of Fact - Financial Issues in Athletics & Boosters

153. A meeting occurred in August between administration (Witness 15 and Witness 18), Bill Elliott, Witness 32 , the , and Witness 10 . (Ex. Vol. 5 p. 86 (Witness 15)); see also Ex. Vol. 5 p. 101 (Tom Maglisceau describing generally the concerns learned about the FCA funds).) During this meeting, the FCA account and other accounting (Bobcat Moms and Quarterback Club) was discussed. (Ex. Vol. 5 p. 86.) However, Athletics did not provide Administration access to the FCA account at the time.²⁰ (Ex. Vol. 5 p. 86.) The lack of transparency creates a perception (whether founded or not) that Athletics is either concealing financial information and/or unwilling to bring control of such funds into compliance with law and/or Board Policy, even if required.

154. In the course of the Investigation, in partnership with CPD, Witness 15 escorted CPD to Allison Ginn and Bill Elliott's offices to search for any relevant documents. (Ex. Vol. 5 p. 86.) A big box of bank statements was gathered from Bill Elliott's office, and CISD Police Chief Proffer has that box. *Id.* The bank records reflect "Celina FCA," and use Celina's central administration address. *Id.* Witness 15 states had heard of that account but had not been provided access to the account or those records. *Id.* This investigation does not make any findings regarding the accounting or use of those funds; **TGC 552.101 / TEC 21.355**

TGC 552.10 During the course of the Investigation, and during the inspection of Bill Elliott's office, a large amount of cash was discovered in a safe in Bill Elliott's office. (Ex. Vol. 3 p. 66; Ex. Vol. 5 p. 86-87 (Witness 15 describing the process by which that cash was located); Ex. Vol. 5 p. 101-02 (Witness 18).) According to Non-Witness 20 , who works in that office, doctors would perform physicals to CISD

²⁰ The District may now have access to the accounts and cash, but that only occurred in the course of this investigation. (E.g., Ex. Vol. 5 p. 86 (Witness 15).)

athletes and "donate" money paid for the physicals back to Athletics. (Ex. Vol. 3 p. 66.) Athletics apparently keeps no records to account for the receipt of this donation or adequate accounting of how the donation is used. *Id.* The District's Administration was unaware of this ongoing donation or whether it is properly accounted for.²¹ (Ex. Vol. 5 p. 86-87 (Witness 15).) This investigation does not make any findings regarding the accounting or use of that cash; TGC 552.101 / TEC 21.355

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156. Bobcat Moms has been described as a nonprofit organization of parents supporting athletes (like a booster). (Ex. Vol. 5 p. 44 (Witness 8).) ^{Witness 8}
, has **TGC 552.101 / TEC 21.355**

(Ex. Vol. 5 p. 44 (Witness 8).) The District has had trouble moving the homecoming parade (which is organized by and raises funds for Bobcat Moms) to a time other than a school day. (Ex. Vol. 5 p. 89 (Witness 15); Ex. Vol. 5 p. 102 (Tom Maglisceau).) The District would like to move it to the evening as to not disrupt the school calendar. (Ex. Vol. 5 p. 89 (Witness 15)) Ex. Vol. 5 p. 102 (Tom Maglisceau). It appears this scheduling issue is (or will soon be) resolved. Nonetheless, - involvement on Bobcat Moms makes the relationship more complicated for Administration to navigate.

157. The Quarterback Club has been described as "like a booster." (Ex. Vol. 5 p. 70 (Witness 14).) ^{Witness 14} , a ^{TGC 552.101 / TEC 21.35} is a **TGC 552.101 / TEC 21.355**
(along with other current and/or former ^{TGC 552.101 / TEC 21.355} *Id.* Tom Maglisceau describes that there have been inappropriate, off-color humor presented at Quarterback Club meetings. (Ex. Vol. 5 p. 103.) Community members have expressed concerns about the appropriateness (or inappropriateness) of this humor. (Ex. Vol. 5 p. 103 (Tom Maglisceau).) There is also a concern that Quarterback Club has earned money by selling ad space in the school building (through a third party, MVP). (Ex. Vol. 5 p. 103.) - involvement in Quarterback Club makes the relationship more complicated for administration to navigate.

²¹ Witness 15 states the cash has now been counted and deposited into an activity account for the school. (Ex. Vol. 5 p. 87.)

²² **TGC 552.101 / TEC 21.355**

Other Findings of Fact - Hostile Work Environment at MMS

158. **TGC 552.101 / TEC 21.355**

159. **TGC 552.101 / TEC 21.355**

a. Witness 9

TGC 552.101 / TEC 21.355

TGC 552.101 / TEC 21.355

TGC 552.101 / TEC 21.355

TGC 552.101 / TEC 21.355

TGC 552.101 / TEC 21.355

^{Witness 16} was on the “outs” after that. (Ex. Vol. 5 p. 93.) In other words, ^{Witness 16}
TGC 552.101 / TEC 21.355

TGC 552.101 / TEC 21.355

3

TGC 552.101 / TEC 21.355

TGC 552.101 / TEC 21.355

²³ TGC 552.101 / TEC 21.355

TGC 552.101 / TEC 21.355

162. Allison Ginn has frustrations with Athletics and CHS that are apparently widely known. (E.g., Ex. Vol. 5 p. 65 (^{Witness 12}); Ex. Vol. 5 p. 79 (^{Witness 14} recalling that Caleb Elliott's hire was "one of the first big clashes between [Elliott and Ginn], and they never saw eye to eye after that"); Ex. Vol. 5 p. 88 (^{Witness 15} describing how Ginn's feelings about Athletics and CHS seem to have trickled down to MMS staff); Ex. Vol. 5 p. 180 (^{Witness 31} stating it is pretty apparent that there has been conflict between Ginn and Bill Elliott/Athletics.) Ginn also expresses these frustrations to those around her, including her supervisor and subordinates. (Ex. Vol. 5 p. 65 (^{Witness 12} , Ginn's supervisor, describing as a sounding board for such frustrations) and 66 (^{Witness 12} **TGC 552.101 / TEC 21.355**

(^{Witness 14} , **TGC 552.101 / TEC 21.355**, observing that is a confidante to Ginn).) These frustrations have escalated over time. (E.g., Ex. Vol. 5 p. 65 (^{Witness 12}).) This behavior reflects poorly ^{TGC 552.101 / TEC 21.355}, MMS, and the District as a whole.

Other Findings of Fact – Board Dynamics

163. Witness 10 , describes Bill Elliott as one of his dearest friends. (Ex. Vol. 5 p. 53 (describing that the two are , and knows Caleb Elliott as the son of his best friend).)

164. Witness 11 describes that has been in Bible study with Bill Elliott for many years. (Ex. Vol. 5 p. 57.)

165. Witness 13 describes that has been in the same Bible study with Bill Elliott for twenty years, and meets once a week as part of the Bible study. (Ex. Vol. 5 p. 70.) Witness 13 states that and Bill Elliott do have a personal and social relationship –

(Ex. Vol. 5 p. 70.) Witness 13 emphasized that does believe could be impartial in making difficult decisions about any employee, including Bill Elliott. (Ex. Vol. 5 p. 70, 73 (stating that not only empowers the Superintendent to do something about Bill Elliott or Allison Ginn, but expects the Superintendent to do what is necessary).)

166. All the Board members agree that the Superintendent is empowered to deal with employee issues for any CISD staff, specifically including any action necessary to deal with issues involving Allison Ginn and Bill Elliott. (Ex. Vol. 5 p. 4 (^{Witness 1})); Ex. Vol. 5 p. 15 (^{Witness 3})); Ex. Vol. 5 p. 47 (^{Witness 8}); Ex. Vol. 5 p. 54 (^{Witness 10}); Ex. Vol. 5 p. 60 (^{Witness 11}); Ex. Vol. 5 p. 73 (^{Witness 13}); Ex. Vol. 5 p. 200 (^{Witness 34}).) Nonetheless, there is a perception that some individual Board members would not support a difficult decision involving Bill Elliott. (Ex. Vol. 5 p. 89 (^{Witness 15})); Ex. Vol. 5 p. 107 (Tom Maglisceau indicating a feeling that despite their good intentions, the board has “tended to side with” Bill Elliott on issues of Bill Elliott’s role); Ex. Vol. 5 p. 200 (^{Witness 34}).)

167. Allison Ginn and Bill Elliott, as leaders in the District, should be held to a high standard of excellence in their conduct, professionalism, and management of others. (*See, e.g.*, Ex. Vol. 5 p. 60 (^{Witness 11})); Ex. Vol. 5 p. 73 (^{Witness 13}).) They set an example for others **TGC 552.101 / TEC 21.355**

Other Findings of Fact – Other Issues

168. **TGC 552.101 / TEC 21.355**

TGC 552.101 / TEC 21.355

TGC 552.101 / TEC 21.355

170. Bill Elliott is the Athletic Director and Head Football Coach at CHS. Bill Elliott is also Caleb Elliott's father. Caleb Elliott has been arrested multiple times since October 3, 2025 for conduct allegedly involving MMS students. No less than 35 individual MMS students ("Student Plaintiffs") have filed suit against CISD and Caleb Elliott, alleging, *inter alia*, sexual misconduct by Caleb Elliott.²⁴ There may be other students involved in this situation who have not filed suit against the District. Presumably, most or all of the Student Plaintiffs are current or former MMS student athletes, who would currently be in grades 7-9. Presumably, most or all of the Student Plaintiffs will continue to attend CISD schools, attending CHS in the next year or two. Presumably, at least some of the Student Plaintiffs hope to continue to participate in Athletics at CHS. Under these circumstances, the placement of current or former MMS student athletes who are alleged victims of Caleb Elliott's misconduct into CHS athletic programs overseen by Bill Elliott raises significant concerns regarding public trust and the District's ability to provide a learning and athletic environment free from even a perception of undue influence or compromised oversight.

²⁴ Notwithstanding this perception, there is no evidence that any witness in this investigation had information about Caleb Elliott which should have been (but was not) reported to any internal or external entity other than what is set forth herein. (See *supra* Paragraph 135.)

²⁵ The Investigator has no information whatsoever about individual identities of any students involved in the situations giving rise to Caleb Elliott's arrests or the individual students who are plaintiffs in lawsuits against the District. These Findings of Fact are made on presumptions about the Student Plaintiffs based on their allegations in the lawsuits.

APPLICABLE LAW & POLICY

Each principal must approve each teacher or staff appointment to the principal's campus. Tex. Educ. Code § 11.1513.

Each principal shall assign, evaluate, and promote personnel assigned to the campus. Tex. Educ. Code § 11.202(b)(5).

A term-contract employee has a right to request a hearing after receiving notice of a school district's proposed decision to terminate the employee contract. Tex. Edu. Code § 21.252. The hearing shall be conducted in the same manner as a trial without a jury in a district court of this state. Tex. Educ. Code § 21.256. The hearing process lasts between 61 and 120 days before a recommendation is issued from an independent hearing examiner, which the Board must thereafter consider at a lawfully posted meeting. Tex. Educ. Code §§ 21.257-258.

A term-contract employee's resignation may be accepted by a school district's board of trustees (or its designee) at any time, *i.e.*, immediately. Tex. Educ. Code § 21.210.

Board Policy DBD(Legal) (issued 10-13-2025) provides, in pertinent part:

Misuse of Official Information

A public servant commits an offense if, in reliance on information to which the public servant has access by virtue of the person's office or employment and that has not been made public, the person:

1. Acquires or aids another to acquire a pecuniary interest in any property, transaction, or enterprise that may be affected by the information;
2. Speculates or aids another to speculate on the basis of the information; or
3. As a public servant, including as a school administrator, coerces another into suppressing or failing to report that information to a law enforcement agency.

A public servant commits an offense if with intent to obtain a benefit or with intent to harm or defraud another, the public servant discloses or uses information for a nongovernmental purpose that:

1. The person has access to by means of the person's office or employment; and
2. Has not been made public.

"Information that has not been made public" means any information to which the public does not generally have access, and that is prohibited from disclosure under Government Code Chapter 552 (the Public Information Act).

Penal Code 39.06(a), (b), (d)

Board Policy DBE(Legal) (issued 11-22-23) provides, in pertinent part:

Definition

In this policy, the term "appoint" includes appointing, confirming the appointment of, and voting to appoint or confirm the appointment of a person.

Nepotism Prohibited

Except as provided by this policy, a public official may not appoint a person to a position that is to be directly or indirectly compensated from public funds or fees of office if:

3. The person is related to the public official by consanguinity (blood) within the third degree or by affinity (marriage) within the second degree [see Consanguinity and Affinity, below]; or
4. The public official holds the appointment or confirmation authority as a member of a local board and the person is related to another member of the board by blood or marriage within a prohibited degree.

Gov't Code 573.002, .041; Atty. Gen. Op. JC-184 (2000).

Board Policy DC(Local) (issued 11-22-23) provides, in pertinent part:

Personnel Duties

The Superintendent shall define the qualifications, duties, and responsibilities of all positions and shall ensure that job descriptions are current and accessible to employees and supervisors.

Posting Vacancies

The Superintendent or designee shall establish guidelines for advertising employment opportunities and posting notices of vacancies. These guidelines shall advance the Board's commitment to equal opportunity employment and to recruiting well-qualified

candidates. Current District employees may apply for any vacancy for which they have appropriate qualifications.

Authority for Employment of All Personnel

The Board delegates to the Superintendent the final authority for employment of contractual personnel, as well as the final authority to employ and dismiss noncontractual employees on an at-will basis. [See DCA, DCB, DCC, DCD, and DCE as appropriate.]

Employment Assistance Prohibited

No District employee shall assist another employee of the District or of any school district in obtaining a new job if the employee knows, or has probable cause to believe, that the other employee engaged in sexual misconduct regarding a minor or student in violation of the law. Routine transmission of an administrative or personnel file does not violate this prohibition. [See CJ for prohibitions relating to contractors and agents and DH(EXHIBIT) for the Educators' Code of Ethics.]

Board Policy DFBB(Local) (issued 10-13-25) provides, in pertinent part:

Reasons for proposed nonrenewal of an employee's term contract shall be:

1. Deficiencies pointed out in observation reports, appraisals or evaluations, supplemental memoranda, or other communications.
2. Failure to fulfill duties or responsibilities.
3. Incompetency or inefficiency in the performance of duties.
4. Inability to maintain discipline in any situation in which the employee is responsible for the oversight and supervision of students.

14. Failure to meet the District's standards of professional conduct.

19. Any activity, school-connected or otherwise, that, because of publicity given it, or knowledge of it among students, faculty, or the

community, impairs or diminishes the employee's effectiveness in the District.

20. Any breach by the employee of an employment contract or any reason specified in the employee's employment contract.
21. Failure to maintain an effective working relationship, or maintain good rapport, with parents, the community, or colleagues.

* * *

25. Use of profanity in the course of performing any duties of employment, whether on or off school premises, in the presence of students, staff, or members of the public, if reasonably characterized as unprofessional.

* * *

Superintendent's Recommendation

The Superintendent shall prepare lists of employees whose contracts are recommended for renewal or proposed nonrenewal by the Board. Supporting documentation, if any, and reasons for the recommendation shall be submitted for each employee recommended for proposed nonrenewal.

Board Policy DH(Exhibit) (issued 1-14-21) provides, in pertinent part:

Educators' Code of Ethics

The Texas educator shall comply with standard practices and ethical conduct toward students, professional colleagues, school officials, parents, and members of the community and shall safeguard academic freedom. The Texas educator, in maintaining the dignity of the profession, shall respect and obey the law, demonstrate personal integrity, and exemplify honesty and good moral character. The Texas educator, in exemplifying ethical relations with colleagues, shall extend just and equitable treatment to all members of the profession. The Texas educator, in accepting a position of public trust, shall measure success by the progress of each student toward realization of his or her potential as an effective citizen. The Texas educator, in fulfilling responsibilities in the community, shall cooperate with parents and others to improve the public schools of the community. 19 TAC 247.1

Professional Ethical Conduct, Practices, and Performance

Standard 1.2. The educator shall not intentionally, knowingly, or recklessly misappropriate, divert, or use monies, personnel, property, or equipment committed to his or her charge for personal gain or advantage.

Standard 1.3. The educator shall not submit fraudulent requests for reimbursement, expenses, or pay.

Standard 1.4. The educator shall not use institutional or professional privileges for personal or partisan advantage.

Standard 1.5. The educator shall neither accept nor offer gratuities, gifts, or favors that impair professional judgment or that are used to obtain special advantage. This standard shall not restrict the acceptance of gifts or tokens offered and accepted openly from students, parents of students, or other persons or organizations in recognition or appreciation of service.

Standard 1.7. The educator shall comply with state regulations, written local school board policies, and other state and federal laws.

Standard 1.8. The educator shall apply for, accept, offer, or assign a position or a responsibility on the basis of professional qualifications.

Standard 1.10. The educator shall be of good moral character and be worthy to instruct or supervise the youth of this state.

Ethical Conduct Toward Professional Colleagues

Standard 2.1. The educator shall not reveal confidential health or personnel information concerning colleagues unless disclosure serves lawful professional purposes or is required by law.

Standard 2.3. The educator shall adhere to written local school board policies and state and federal laws regarding the hiring, evaluation, and dismissal of personnel.

Standard 2.6. The educator shall not use coercive means or promise of special treatment in order to influence professional decisions or colleagues.

Standard 2.7. The educator shall not retaliate against any individual who has filed a complaint with the SBEC or who provides information for a disciplinary investigation or proceeding under this chapter.

Board Policy DNA(Local) (issued 7-17-17) provides, in pertinent part:

Annual Appraisal

District teachers shall be appraised annually.

Exception

Teachers who are eligible for less frequent evaluations in accordance with law [see DNA(LEGAL)] and the local criteria established in this policy shall be appraised in accordance with the [Less-than-Annual Eligibility requirements in policy].

Board Policy DNA(Legal) (issued 5-28-24) provides, in pertinent part:

Teacher Appraisal

The employment policies adopted by the board must require a written evaluation of each teacher at annual or more frequent intervals.

A teacher appraisal must be done at least once for each school year. A teacher may be appraised less frequently if the teacher agrees in writing and the teacher's most recent evaluation rated the teacher as at least proficient, or the equivalent, and did not identify any area of deficiency. A teacher who is appraised less frequently than annually must be appraised at least once during each period of five school years.

Board Policy DIA(Local) provides, in pertinent part:

Statement of Nondiscrimination

The District prohibits discrimination, including harassment, against any employee on the basis of race, color, religion, sex, national origin, age, disability, or any other basis prohibited by law. Retaliation against anyone involved in the complaint process is a violation of District policy and is prohibited.

Discrimination

Discrimination against an employee is defined as conduct directed at an employee on the basis of race, color, religion, sex, national origin, age, disability, or any other basis prohibited by law, that adversely affects the employee's employment.

In accordance with law, discrimination on the basis of sex includes discrimination on the basis of biological sex, gender identity, sexual orientation, gender stereotypes, or any other prohibited basis related to sex.

* * *

Prohibited Harassment

Prohibited harassment of an employee is defined as physical, verbal, or nonverbal conduct based on an employee's race, color, religion, sex, national origin, age, disability, or any other basis prohibited by law, when the conduct is so severe, persistent, or pervasive that the conduct:

1. Has the purpose or effect of unreasonably interfering with the employee's work performance;
2. Creates an intimidating, threatening, hostile, or offensive work environment; or
3. Otherwise adversely affects the employee's performance, environment, or employment opportunities.

Board Policy GE(Local) provides, in pertinent part:

District-affiliated school-support organizations and booster organizations, and other parent groups, shall organize, fundraise or solicit donations, and function in a way that is consistent with the District's philosophy and objectives, Board policies, District administrative regulations, applicable UIL or other governing

association guidelines, and financial and audit regulations. [See also CDC and CFC]

Before engaging in fundraising or soliciting gifts, an organization or group shall obtain approval from the principal or other appropriate administrator identified in administrative regulations. [See CDC(LOCAL) for District acceptance of gifts and solicitations]

The CISD Employee Handbook for 2025-26 provides, in pertinent part:

For those with less [than five of the last eight years'] experience, the probationary period will be three school years (i.e., three one-year contracts) with an optional fourth school year if the board determines it is doubtful whether a term or continuing contract should be given.

* * *

All employees will participate in the evaluation process with their assigned supervisor at least annually.

* * *

[Employees are expected to:] Express concerns, complaints, or criticism through appropriate channels.

(Handbook p. 14, 19, 41.)

CONCLUSIONS

In short, this Investigation can be separated into four sections with outcomes, as fully set forth below:

- I. Allegations regarding District officials' knowledge and/or actions related to Caleb Elliott's misconduct are not sustained.
- II. Systemic issues and/or failures in Athletics are sustained.
- III. Systemic issues and/or failures at MMS are sustained.
- IV. Board governance issues are not sustained.

After due consideration of the evidence, including information from 39 witnesses and my own information gathering, and matters as stated in the Findings of Fact, in my capacity as Investigator, I make the following conclusions based on a preponderance of evidence:

I. Allegations regarding District officials' knowledge and/or actions relative to Caleb Elliott's misconduct are not sustained.

There is no evidence in this Investigation to substantiate knowledge of any witness of any of the following allegations:

- An "improper relationship with a then-senior of the high school" and Caleb Elliott while Caleb was substitute teaching during the 2022-23 school year (or at any other time).
- Any reason to report Caleb Elliott to law enforcement for investigation of an illegal relationship with a teenage student.
- Caleb Elliott was moved to (or hired at) MMS in the summer of 2023 (or at any other time) as an eighth-grade coach and sixth-grade social studies teacher instead of terminating him upon discovery of an improper and unlawful relationship.
- A confrontation between Caleb Elliott and another coach in relation to previous attempts to record children in the locker room; there being multiple witnesses to such incident.
- An incident of Caleb Elliott placing cameras in the locker room in the 2024-25 school year (or at any other time).
- Anyone at CISD mailing apology letters to select parents of children imaged by cameras in the locker room during the 2024-25 school year (or at any other time).
- Caleb Elliott required student(s) to do jumping jacks or burpees nude.
- Any other concerns about Caleb Elliott's presence and/or conduct in the locker room before October 2, 2025.

(See *supra* Paragraph 124-136.) Although there were other concerns about Caleb Elliott, as fully set forth *supra* Paragraph 135, none of those concerns were of a nature which would require a report to any outside entity (like the Department of Family Protective Services (CPS), TEA/SBEC, or law enforcement).

Other than the concerns about Caleb Elliott and the District responses, as fully set forth *supra* Paragraph 135, there is no evidence in this Investigation that "at least one teacher at [MMS] reported that Caleb Elliott was behaving inappropriately towards children." (See *supra* Paragraph 133.) No evidence in this Investigation reflected a report which was "disregarded," and/or minimized or ignored. Current and former employee witnesses had no knowledge of this alleged incident, or who may have been an employee who left employment as a result of a report that was disregarded, minimized or ignored.

Caleb Elliott was rotated out of the locker room during the 2024-25 school year, as fully set forth *supra* Paragraph 58, but was never "excluded" or absent from the program for a period of time. There is no evidence of a "ban" from the locker room, and thus no steps to ensure that there was adherence to a ban.

The District has, during the time periods pertinent to this Investigation, made reasonable efforts to supervise staff in the locker rooms. (*See supra* Paragraph 138-43.) In the meantime since Caleb Elliott's arrest, the District has implemented additional safeguards and protocol for students and staff in the locker rooms. (*See supra* Paragraph 100.)

As fully set forth *supra* Paragraph 151, Caleb Elliott, and other District officials were trained in Child Abuse Identification and Prevention among other training areas during the relevant period (2023-24 through 2025-26). The District maintains policies and continuing education in a manner aimed to avoid and report abuse. (*See supra* Paragraph 152.)

The District did not enter into a proposed-termination process for Caleb Elliott. (*See supra* Paragraph 105.) A term-contract employee has a right to request a hearing after receiving notice of a school district's proposed decision to terminate the employee contract. Tex. Edu. Code § 21.252. The hearing is conducted in the same manner as a trial without a jury in a district court of this state, and takes between 61-120 days. Tex. Educ. Code § 21.256. A school board can instead accept a resignation immediately. Tex. Educ. Code § 21.210. Acceptance of an immediate resignation is what occurred here; and by accepting Caleb Elliott's immediate resignation on or about October 13, 2025 the District ended Caleb Elliott's employment more swiftly than entering into a proposed-termination process.

Finally, the District did not fail to report Caleb Elliott to the SBEC for immediate investigation and potential certificate revocation. Witness 30 sent no less than five reports to SBEC/TEA regarding Caleb Elliott on behalf of the District between October 3, 2025 and November 29, 2025. (*See supra* Paragraphs 94, 102, 106, 113, 119.) Further, as a condition of accepting Caleb Elliott's resignation on October 13, 2025, the District required Caleb Elliott to surrender his teaching certification. (*See supra* Paragraphs 105, 115.) Publicly available SBEC/TEA records reflect that the surrender occurred at least as of October 27, 2025.

II. Systemic issues and/or failures in Athletics are sustained:

TGC 552.101 / TEC 21.355

TGC 552.101 / TEC 21.355

TGC 552.101 / TEC 21.355

none of ^{TGC 552.101 / TEC 21.355} appear to have caused the situation giving rise to Caleb Elliott's arrests.

TGC 552.101 / TEC 21.355

TGC 552.101 / TEC 21.355

TGC 552.101 / TEC 21.355

Regardless, and to be clear, there is not evidence that Caleb Elliott should not have been hired due to any alleged misconduct (known or unknown) at the time he was hired. Further, there is not evidence that there was any reason to suspect that he might someday go on to commit misconduct at the time he was hired.

B. Familial and other relationships create violations of Board Policy in Athletics.

The familial relationships in Athletics create a perception (whether founded or not) that Athletics staff receives special treatment, is allowed to do things that others in the District are not, and/or is not accountable in the same way others (who are not members of powerful families, like the ^{TGC 552.101 / TEC 21.} are. (See *supra* Paragraph 148-149.)

Although there is not a policy prohibiting family members from working together at the District, there is at least some evidence that family members (e.g., Caleb Elliott) may not have been put through a rigorous hiring process. This amounts to special treatment which violates Board Policy. (E.g., *supra* Part II.A.) Whether that special treatment extends to other families, or other members of the ^{TGC 552.101 / TEC} family, was not part of this investigation except to the extent that reports of alleged special treatment did come up in certain witness interviews. But without necessity of making any conclusions of actual special treatment, the fact that special treatment has come up in multiple grievances from parent/community members constitutes a circumstance which impairs and/or diminishes those family-member-employees' effectiveness in the District. DFBB(Local) (Reason 19 (any activity which diminishes employee's effectiveness), *see also* Reason 21 (failure to maintain a good working relationship).); *see also* DH(Exhibit) ("The Texas

educator, in exemplifying ethical relations with colleagues, shall extend just and equitable treatment to all members of the profession.).

TGC 552.101 / TEC 21.355

TGC 552.101 / TEC 21.355

C.TGC 552.101 / TEC 21.355

Bill Elliott is not certified as an administrator. **TGC 552.101 / TEC 21.355**

TGC 552.101 / TEC 21.355

GC 552.101 / TEC 21.355
TGC 552.101 / TEC 21.355

D. Other public information diminishes effectiveness.

TGC 552.101 / TEC 21.355

²⁶ TGC 552.101 / TEC 21.355

TGC 552.101 / TEC 21.355

III. Systemic issues and/or failures at MMS are sustained.

TGC 552.101 / TEC 21.355

Although ^{TGC 552.101 / TEC 21.355} warrant attention and correction by the District, it is important to note that none of these failures appear to have caused the situation giving rise to Caleb Elliott's arrests.

TGC 552.101 / TEC 21.355

TGC 552.101 / TEC 21.355

TGC 552.101 / TEC 21.355

TGC 552.101 / TEC 21.355

TGC 552.101 / TEC 21.355

Regardless, and to be clear, there is not evidence that Caleb Elliott should not have been hired due to any alleged misconduct (known or unknown) at the time he was hired. Further, there is not evidence that there was any reason to suspect that he might someday go on to commit misconduct at the time he was hired. Witness 26 _____ said in the Investigation that although he seemed immature, like a kid himself, _____ had no reason to believe Caleb Elliott was a predator or capable of conduct like what he has been accused of. (Ex. Vol. 5 p. 195.) **TGC 552.101 / TEC 21.355**

TGC 552.101 / TEC 21.355

TGC 552.101 / TEC 21.355

TGC 552.101 / TEC 21.355

TGC 552.101 / TEC 21.355
TGC 552.101 / TEC 21.355

TGC 552.101 / TEC 21.35 TGC 552.101 / TEC 21.

TGC 552.101 / TEC 21.355

TGC 552.101 / TEC 21.355

TGC 552.101 / TEC 21.355

TGC 552.101 / TEC 21.355

IV. Board governance issues are not sustained.

There are a number of close, personal relationships between individual Board members and Bill Elliott. (*See, e.g., supra* Paragraphs 163-165.) Each Board member has stated that he or she could remain objective and would support the Superintendent if adverse employment action became necessary against Bill Elliott—such action including a written reprimand, placement on administrative leave, and/or a recommendation for termination of employment. (*See supra* Paragraph 166.) To date, however, there has been little opportunity to test that assertion.

Board member involvement in the Quarterback Club and Bobcat Moms presents challenges for administration in ensuring that those organizations operate consistently with Board policy and District business. (*See supra* Paragraphs 156-157.)

While no clear Board governance violation is identified, the Board should remain mindful of the need to ensure that personal relationships and/or involvement with community organizations do not, in the future, give rise to governance concerns.

RECOMMENDATIONS

After due consideration of the evidence, including information from 39 witnesses and my own information gathering, and matters as stated in the Findings of Fact and Conclusions, in my capacity as Investigator, I make the following Recommendations:

Student Safety

1. Develop and enforce a policy for use of sensitive areas (like locker rooms and other changing areas). The policy should, at a minimum,
 - a. prohibit use of cell phones or cameras of any type for adults and students,
 - b. adjust staffing to allow two adults in the area when students are present,
 - c. encourage reporting and provide resources for reporting misconduct of adults and students including internal and external opportunities to report misconduct,

- d. train coaches and any other staff working in sensitive areas on protocol and reporting.
- 2. Develop, disseminate, and follow a consistent policy for handling concerns/complaints against staff members, including when and how to: contact an external investigatory body (e.g., CPS, law enforcement, and/or TEA/SBEC), contact parents, contact HR, create documentation to the parent, and create documentation for the staff member's file when appropriate. Ensure records are retained in accordance with Board Policy.
- 3. Reaffirm and widely communicate clear reporting methods for concerns about employee misconduct, consider adding anonymous reporting options, and emphasize that failure to report may result in disciplinary action.
- 4. Continue to train all employees on their obligations to report potential misconduct, and provide support from Administration and Athletics in any reports.
- 5. Communicate districtwide that student safety and ethical conduct take precedence over loyalty, reputation, or program success, and that the District will act promptly and impartially when concerns arise.
- 6. Witness 34 expressed serious concern about Bobcat Hour, based on experiences. (Ex. Vol. 5 p. 201 (Witness 34).) The District, and specifically MMS, should review procedures to ensure that Bobcat Hour is managed in accordance with the District's duties under law and policy. If Bobcat Hour cannot be managed in accordance with the District's duties under law and policy, it should be eliminated.

Personnel Generally

- 7. Increase frequency and intensity of evaluations of staff at every level. (See Ex. Vol. 5 p. 4 (Witness 1).) Ensure that records of evaluations for at-will and contract employees, for any duties including teaching and/or coaching, are maintained in a centralized location and accessible to Human Resources. Ensure that all evaluators are keeping accurate records of completed evaluations in Skyward (or other electronic repository designed for such use).
- 8. Create consistency in the hiring process and exercise a high level of rigor in screening and vetting all applicants. (Ex. Vol. 5 p. 15 (Witness 3); Ex. Vol. 5 p. 60 (Witness 11); Ex. Vol. 5 p. 74 (Witness 13).) Require uniform, documented hiring procedures for all positions, including standardized interview questions, reference checks, and verification of employment history gaps.
- 9. Ensure external references are prioritized. (Ex. Vol. 5 p. 164 (Witness 30 describing best practices, including references and rigorous processes); *see also* Ex.

Vol. 5 p. 223 (Witness 34 describing concerns about references not being contacted).)

10. Require written disclosure of familial relationships during the hiring process, with independent review by HR. Consider increasing rigor in vetting family-member candidates.
11. Create consistency in posting coaching positions – Athletics in collaboration with Administration – to ensure the best possible candidates are considered and hired.
12. Increase vetting of social media for potential employees – and steer clear of candidates who display overly sexual content (regardless if it is in a hetero- or homo-sexual way). (Ex. Vol. 5 p. 58 (Witness 11).)
13. Create consistency and/or ensure campus principals follow the Handbook related to the minimum period of probation for employees. The District should ensure that all principals are aware of recommended contract extensions, and recommendations for when to issue a Term vs. Probationary contract, and adhere to that recommendation.
14. Family members must not report through, supervise, or evaluate other family members. (See Ex. Vol. 5 p. 55 (Witness 10 discussing this concern); Ex. Vol. 5 p. 164 (Witness 30 expressing same).)
15. Consider adding to the Employee Handbook (and/or Board Policy) a definition of “conflict of interest relationship” including for spouses, close relatives, and/or dating relationships. Consider prohibiting (for any conflict-of-interest relationship) employees from:
 - a. working in the same line of budgetary approval or oversight within a school, department, or program.
 - b. being either directly or indirectly supervised by, or under the supervision of, any person in their own conflict-of-interest relationship.
 - c. hiring, recommending, or suggesting for full-time, part-time, or substitute employment any person in their own conflict-of-interest relationship.Consider adding to that prohibition a prohibition on any other personal relationship (either by marriage, dating, or other scenarios who are not otherwise prohibited) if the relationship becomes disruptive to the operations of the District or if the relationship is not in the best interests of the District.
16. Consider implementing a “scalable” leadership model in Athletics, led by a certified administrator.
17. Protect all witnesses in the Investigation from retaliation due to their participation in the Investigation. (Retaliation does not include legitimate documentation of performance concerns, but proceed with caution that no action could reasonably be perceived as retaliation.)

18. TGC 552.101 / TEC 21.355

and Tom Maglisceau), TGC 552.101 / TEC 21.355

Specific Personnel Issues

19. TGC 552.101 / TEC 21.355

20. TGC 552.101 / TEC 21.355

21. TGC 552.101 / TEC 21.355
TGC 552.101 / TEC 21.355

²⁷ The Texas Commissioner of Education has found that an educator's single violation of a public-school district's standards of employee conduct, Board policies, or the Educators' Code of Ethics may constitute good cause supporting the proposal and subsequent termination of a term contract.

²⁸ The District may reassign any contract employee. (*See, e.g.*, Ex. Vol. 3 p. 20-21 (¶¶ 1.3, 3.2), 24-25 (¶¶ 1.3, 3.2).)

²⁹ Bill Elliott's operative contract expires at the end of the 2026-27 school year. (*See supra* Paragraphs 45, 70, 72.)

³⁰ *See supra* n.28.

TGC 552.101 / TEC 21.355

TGC 552.101 / TEC 21.355

Board Governance

26. Administration should take measures to ensure that the Board is apprised of major happenings in the District (like safety issues, or if someone is removed from a position) so Board members do not learn of these events from the community. (Ex. Vol. 5 p. 4 (Witness 1 expressing a desire for better communication); Ex. Vol. 5 p. 15 (Witness 3); Ex. Vol. 5 p. 47 (Witness 8 expressing concerns that the board is not kept apprised of what's going on at the campus level—and

³¹ Known issues in Athletics reflect that the department should be led by a certified administrator—regardless of Bill Elliott’s coaching assignment.

would like to know when an employee is placed on an improvement plan (not necessarily by name, but just so the board is aware of efforts to hire and retain high-quality staff), and/or when major issues arise.)

27. Review Board email protocol to ensure that Trustees know and feel confident that 1) they receive all emails sent to their CISD email address; and 2) appropriate acknowledgement is being sent on their behalf. (See Ex. Vol. 5 p. 48 (^{Witness 8} concerns); Ex. Vol. 5 p. 59 (^{Witness 11} stating it's possible has not seen all emails because they do not come directly to).)
28. Board members should abstain from relations between Administration and Bobcat Moms and/or Quarterback Club. (Not abstain from membership and/or participation, but abstain from dealings between the organizations on planning events, financial issues, etc.) Abstention will assuage any perception of dual-role involvement.
29. If Bobcat Moms and/or Quarterback Club are not already official "boosters" as that term would be defined in Board Policy, Administration should ensure that the groups become official boosters, subject to Board Policy and other law.

[End]