



**CHARGES OF DISMISSAL**  
**Sullivan County Board of Education**

**Matthew Hawn**

Comes the Sullivan County Board of Education Director of Schools, Dr. David Cox, and brings the following Charges of Dismissal, pursuant to Tenn. Code Ann. §§ 49-5-501, et seq. and Board Policy 5.200, against tenured teacher Matthew Hawn ("Hawn").

1. Hawn is a tenured teacher currently assigned to Sullivan Central High School. He obtained tenure with Sullivan County Schools in September, 2008.
2. During the 2020-2021 school year, Hawn – as part of his duties – taught Contemporary Issues.
3. As a teacher licensed by the State of Tennessee, Hawn at all times has remained bound by the Tennessee Teacher Code of Ethics (Tenn. Code Ann. §§ 49-5-1001, et seq.), this includes, but is not limited to, fulfilling the following obligations to students:
  - "Not unreasonably restrain the student from independent action in the pursuit of learning."
  - "Not unreasonably deny the student access to varying points of view."
  - "Not intentionally expose the student to embarrassment or disparagement."
  - "Not on the basis of ... political or religious beliefs ... unfairly ... deny benefits to the student ... or grant any advantage to the student."
  - Maintain a professional approach with the student at all times."

(See Tenn. Code Ann. §49-5-1003).

4. Under the Tenure Act at Tenn. Code Ann. § 49-5-501(3)(D), "conduct unbecoming to a member of the teaching profession" (or unprofessional conduct) can mean "disregard of the teacher code of ethics ... in such a manner as to make one obnoxious as a member of the profession."
5. Under Tenn. Code Ann. § 49-5-501(7), "insubordination" can mean "refusal or continued failure to obey the school laws of this state ... or to carry out specific assignments made by the board, the director or the principal ...."
6. As the facts below will illustrate, Hawn should be dismissed as a tenured teacher with Sullivan County Schools based upon his insubordination and his repeated unprofessional conduct.



7. Only a few months ago, in February 2021, Hawn received a detailed letter of reprimand, copy attached hereto as Exhibit A. Therein, Hawn's unprofessional conduct consisted of: (a) questionable judgment in assigning an article for students to read containing inappropriate terms; and (b) unreasonably denying Contemporary Issues students access to varying points of view in violation of the Teacher Code of Ethics.
8. Within the February letter of reprimand, Hawn was specifically reminded that: "Your job is not to teach one perspective. Your job is also not to ensure students simply adopt your own personal perspective. Your job – in teaching Contemporary Issues – is to ensure students learn to seek out and consider varying and credible perspectives."
9. After Hawn appealed the issuance of his letter of reprimand to the Sullivan County Board of Education, the Board – in a public meeting held in early March – voted 6-0 to uphold the letter of reprimand.
10. After Hawn was reminded of his responsibilities and duties by both the Board and the Director of Schools, however, students recently reported that Hawn showed a video containing inappropriate terms to his class later in March.
11. The video at issue, "White Privilege" by Kyla Jenée Lacey, can be found on YouTube. Within the 3:38 minute video, Ms. Jenée Lacey recites a spoken word poem regarding her thoughts on white privilege and aspects of the same. Though appropriate discussion around concepts like white privilege remain perfectly appropriate for a high school class like Contemporary Issues, Ms. Jenée Lacey utilized several inappropriate terms for a high school demonstrative/assignment, including: "f\*\*\*\*" (55 sec.); "s\*\*\*\*" (1:20 and 1:44 min); "h\*\*\*\*" (1:42 min.); "n\*\*\*\*\*" (2:06 min); "f\*\*\*\*\*" (2:19 min); "f\*\*\* my brains out" (2:22 min.); "a\*\*\*\*\*" (3:16 min.).
12. Hawn clearly knew the video's content was inappropriate, especially in light of the prior letter of reprimand, as more than one student confirmed that Hawn remarked to the class that playing the video could affect his job status (one student quoted Hawn as saying – "I'm about to get fired but I don't really care.")
13. Both a sampling of Hawn's Contemporary Issues students and Mr. Hawn himself were interviewed regarding this incident. Though the school system possesses evidence showing the video was played with the inappropriate language, and though students confirmed they heard it, Hawn claimed that he timed it out and hit mute as such terms were being said aloud during the video.
14. Hawn and the sampling of students also confirmed that no other videos were

DIRECTOR OF SCHOOLS  
DR. DAVID A. COX

INTERIM DIRECTOR  
EVELYN RAFALOWSKI

ASSISTANT DIRECTOR  
ANGELA BUCKLES

ASSISTANT DIRECTOR  
INGRID DELOACH



## SULLIVAN COUNTY SCHOOLS

### BOARD OF EDUCATION

RANDALL GILMORE  
MICHAEL HUGHES  
MARK IRESON  
RANDALL JONES  
PAUL ROBINSON  
DR. MARY ROUSE  
MATTHEW SPIVEY

played, or materials assigned, that would have offered Contemporary Issues students a different perspective than the one offered by Ms. Jenée Lacey. Hawn, when interviewed, acknowledged he had not offered varying assignments/perspectives due to believing that the views expressed by Ms. Jenée Lacey and others on white privilege are simply fact, rather than opinion.

15. More than one student also reported hearing Hawn make a comment at the end of class that day belittling certain views, which admittedly differed from Hawn's. In talking to another group of students Hawn was overheard to say, "They don't know anything, oh it's fine."
16. As noted within the prior letter of reprimand, Hawn remained more than welcome to offer and discuss appropriate materials with Contemporary Issues students which provided a more liberal perspective, assuming he would know that would also require offering and discussing appropriate materials which provided a more conservative perspective on the same subject matter. This crucial – and ethical – standard was lost on Hawn in early 2021, and it appears that it is still lost on him now.

Therefore, based on the foregoing, and citing grounds of insubordination and repeated unprofessional conduct, the Director of Schools is requesting to move forward with these Charges of Dismissal against Matthew Hawn.

Submitted on this the 10th day of May, 2021.

---

Dr. David Cox, Director of Schools