

DESCRIPTION OF COMPLAINT

AGAINST

KARL DEAN SHATLEY OF CAMPBELL SHATLEY, P.L.L.C.

I am filing this complaint as a private citizen who was subjected to an attorney's grossly unprofessional misconduct. Such conduct was deliberate, dishonest, negligent, and subjected me to unnecessary duress due to misrepresentation during and after the incident. This unethical behavior, in regards to truthfulness in his statements and due to his lack of respect for the rights of others, undermines public trust.

The initial incident occurred while presenting my remarks during the public comment portion at the Buncombe County School Board meeting on January 9, 2014. In addition, the account of the remarks during my comment session were grossly misrepresented in the meeting minutes, which were approved at the February 6, 2014 regular School Board Meeting.

Buncombe County School Board attorney, Mr. Karl Dean Shatley, was using his position to suppress my comments and influence the public as to the content of my remarks at the January 9th, 2014 Buncombe County School Board meeting. **Mr. Shatley created a tribunal atmosphere by continuing to interrupt my public comment and by making inaccurate statements about my comment. His conduct involved misrepresentation, duress and harassment, a violation of the "Rules of Professional Conduct".**

A videotaped record of the event can be accessed at <http://vimeo.com/83883088#t=36m05s>
Please view marker 50:29, the beginning of my "public comment".

The misrepresentation carried over to the meeting minutes. The inflammatory, inaccurate meeting minutes intended to represent my public comment were posted online on February 3, 2014 on the "Buncombe County School Board Agenda". The minutes merely stated: "**Linda Humphries addressed Ms. Blunt and her job performance. Ms. Humphries was asked by Mr. Shatley to discontinue speaking in that manner about an employee.**" This is a misrepresentation of mine and Mr. Shatley's actual comments which is evident by viewing the meeting minutes which are included within the February 6, 2014 agenda under "Consent Agenda" and can be viewed online by going to <http://www.buncombe.k12.nc.us/>, then selecting *Board of Education, 2014 Archived Minutes, February 6, 2014*. The direct link to the minutes is:
http://www.buncombe.k12.nc.us/cms/lib5/NC01000308/Centricity/Domain/98/2_6_14_min_1_9_14_os.pdf

The *"Audio" transcript of the event is attached. This written transcript was presented to the Buncombe County School Board on February 6, 2014 at the school board's regular open meeting, video link: <http://vimeo.com/86130872#t=70m09s> Please view marker 1:14. I asked to have the transcript included in the meeting minutes. I spoke to the legal and professional obligation of the board and the attorneys. One board member made a motion to amend the meeting minutes. The motion failed due to not receiving a second.

While firm attorney, Christopher Campbell was present at the February 6 meeting, he offered no

insight. **Attorney Shatley made the reference to Ms. Blunt in his public display. He created a false representation. The continuation of this misrepresentation was a dishonest wrong-doing which would have been addressed by honest, professional attorneys.**

While a school board has a professional responsibility to keep accurate meeting minutes, board attorneys (Mr. Dean Shatley and Mr. Christopher Campbell of Campbell Shatley, PLLC) have a legal responsibility to assist their clients in the correction of a **misrepresentation or civil wrongdoing**; as well as, a **professional duty to maintain the public trust**. Mr. Shatley initiated this misrepresentation during my public comment on January 9, 2014. Given notice of the written minutes wrongdoing at the February 6, 2014 meeting and given that **the attorney(s) did not advise the board to make appropriate corrections, it would appear, the board attorney(s) assisted in the written minutes' misrepresentation. Professional misconduct continued to occur.**

Ironically, my public comment was concerned with communicating the **TRUTH**. As a proponent of public involvement in our children's education, **I fear the precedent set by this occurrence; specifically, the public may not exercise their expressly protected right to speak (within expressed guidelines in a designated open forum) for fear of being censored, shouted down, silenced and misrepresented by a government agency's attorney during their comment; as well as afterwards, with the falsification of their words in public records.**

It is my wish that the NC Bar Association sanction attorney Karl Dean Shatley.

Respectfully,

Linda Humphries

*attachment (2 page Audio transcript)