

AFFIDAVIT OF WILLIAM R. HITE, JR.

I, William R. Hite, Jr. an adult resident of Pennsylvania; under oath and upon penalty of perjury, state as follows:

1. I am an adult over the age of eighteen and have personal knowledge of all facts set forth in this Affidavit of William R. Hite, Jr.
2. I served as the Interim Superintendent of the Prince George's County Public Schools from December, 2008 to April, 2009. In April, 2009 I became the Superintendent of the Prince George's County Public Schools, and I served in this position until July, 2012.
3. In my capacity as Superintendent, I approved the hiring of Principals and those filling executive level positions, including Coordinator of Strategic Business Partnerships; Director of Title I Programs; Director of the School Leadership Development Office; Area Directors and Chief Communications Officer.
4. I am aware of who Carol Barbour is as a result of the applications for employment that she submitted to the Prince George's County Public Schools (PGCPS).
5. As a courtesy, I met with Ms. Barbour in 2010 to discuss her applications.
6. Subsequent to that interview, I contacted Ms. Barbour's former employer to obtain a reference for her.
7. Ms. Barbour's former employer was the Charlotte-Mecklenburg Schools.
8. I knew the Superintendent of Charlotte-Mecklenburg, Peter Gorman. Therefore, I gave Mr. Gorman a call to inquire about Ms. Barbour.
9. Mr. Gorman provided a negative reference regarding Ms. Barbour.

- 10. Mr. Gorman specifically said that Ms. Barbour was "one of the worst principals he had ever been associated with" and he said she was "terrible."
- 11. As a result of this negative reference, I instructed the Chief of Human Resources at PGPCS, Synthia Shilling, to remove Ms. Barbour's name from any list of candidates for positions to ensure that she was not hired.
- 12. At no time was I ever aware that she was Hispanic or Latina.

I affirm under the penalties of perjury that the above declarations are true and based upon my personal knowledge and I know that my statement may be used in a lawsuit that Carol Barbour has filed against the Board of Education of Prince George's County.

DATE: 3/28/13

William R. Hite, Jr.  
WILLIAM R. HITE, JR.

STATE OF PENNSYLVANIA )  
COUNTY OF PHILADELPHIA ) To Wit:

I hereby certify that on this 28<sup>th</sup> day of March 2013, before me, a Notary Public in and for the State and County aforesaid, personally appeared William R. Hite, Jr. of Philadelphia, Pennsylvania, known to me to be the person whose name is subscribed to this written instrument, who, after being sworn, made oath in due form of law that the matters and facts set forth in this foregoing Affidavit of William R. Hite, Jr. are true and correct as therein stated and acknowledged said document to be his true act.

WITNESS my hand and notarial seal.

Michelle A. Reed  
NOTARY PUBLIC

My Commission Expires: October 22, 2013

COMMONWEALTH OF PENNSYLVANIA  
Notarial Seal  
Michelle A. Reed, Notary Public  
City of Philadelphia, Philadelphia County  
My Commission Expires Oct. 22, 2013  
Notary Public Association of Notaries