

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
NORTHEASTERN DIVISION

SONNIE WELLINGTON HEREFORD,)	
IV., et al.,)	
)	
Plaintiffs,)	
)	
AND)	CV-63-MHH-109-NE
)	
UNITED STATES OF AMERICA,)	
)	
Plaintiff-Intervenor,)	
)	
v.)	
)	
HUNTSVILLE BOARD OF)	
EDUCATION, et al.,)	
)	
Defendants.)	

Affidavit of Christie Finley

Background

1. My name is Christie Finley. I am the Superintendent for the Huntsville City Board of Education (“the District”). I have held this position since May 17, 2018, when I was appointed as Interim Superintendent to replace Dr. Matt Akin. In this position, I am responsible for undertaking, directing, and overseeing all activities necessary for the operation of the District’s schools, including oversight and implementation of the District’s Consent Order.

2. Prior to serving as Interim Superintendent and Superintendent, I served as the District's Deputy Superintendent of Strategy and Innovation from July 2017 through August 2018. In addition, I served as the District's Director of Strategy and Innovation from October 2016 through July 2017. In both of those roles, I was responsible for facilitating and overseeing the implementation of the District's Consent Order, including oversight of the District's compliance with Consent Order obligations related to transportation. In addition, my duties included serving as the District's liaison for the Desegregation Advisory Committee ("DAC").
3. My previous experience within the District includes serving as the District's Director of Secondary Programs (June 2014 through January 2017), Principal at Blossomwood Elementary School (2011 through 2014), Principal at Monte Sano Elementary (2010-2011), and serving as an Assistant Principal at Hampton Cove Elementary (2007-2010).
4. I have been employed by the District, in either an administrative or central office position, at all times since the District began implementing the Consent Order. A copy of my complete resume is attached hereto as Exhibit 1.
5. I submit this affidavit to provide background information in support of the Joint Motion for Partial Unitary Status. The purpose of my affidavit

is to provide the Court information necessary for understanding the District's work in preparing this Motion and for explaining the District's future plans for its transportation system.

District's Efforts in Preparing this Motion

6. First, I want to point out the incredible work of District personnel to prepare this motion. District personnel had to find, review, correct, and analyze mountains of data in order to have the information necessary to prepare and complete the Joint Motion for Partial Unitary Status and the supporting documentation.
7. It took the District four years to complete the work necessary to create the records needed to show the Court that the District is operating a transportation system free of the vestiges of *de jure* segregation. In addition to expending 1,000s of man hours, the District had to hire an outside GIS expert to help create and compile the necessary data and expend thousands of dollars in legal fees to prepare the necessary documentation for this Motion.
8. Additionally, District personnel spent countless hours over the past four years working with the United States to provide necessary information and data to allow the United States to complete a full review of the

- District's transportation system. This process involved numerous conference calls, multiple site visits, and innumerable e-mail exchanges.
9. The District also annually received feedback on transportation from the DAC as part of the DAC's annual report. The DAC's feedback led to many improvements in the District's transportation system.
 10. For example, the DAC expressed concerns about the District's transportation system in both the 2016-17 Annual Report and the 2017-18 Annual Report. (See Doc. 575-1, p. 10; Doc. 575-2, p. 6; Doc. 589, pp. 38-39). In response to the complaints received from the DAC and the community at-large, the District re-bid its transportation services and selected a new bus contractor for the 2018-19 school year.

My Future Plans for the District's Transportation Related Activities

11. I have reviewed the work of Scott Gillies, Dr. George Smith, and Matt Sachs, and I have reviewed the District's current transportation plans and procedures.
12. I believe that a transportation plan needs to ensure timely arrivals on safe buses. To be a good steward of the District's money, the transportation plan should be as efficient as possible without creating unsafe or unreasonably long routes for the students.

13. The District's plan must be fair and non-discriminatory. I will work with the District's Transportation Coordinator to ensure that the District continues to have a fair and non-discriminatory transportation plan.
14. I plan to continue the use of the District's 2-Mile Rule and 5-Mile Rule to ensure the District continues to operate a fair and non-discriminatory transportation plan.
15. Additionally, I plan to continue the use of the District's hazard and special circumstance boundaries because those rules are critical for ensuring that we have a fair transportation plan. The hazard and special circumstance boundaries help students, often those with significant needs, to get to school safely. These boundaries minimize absenteeism and tardiness for some of our most at-risk students.
16. My plan for the District is to retain the District's current transportation practices as long as the District's finances permit. These practices accomplish my goal of providing safe, efficient, and timely transportation to Huntsville's students.
17. In sum, I have no plans to make any major changes to the District's current transportation policies or procedures. In addition, I will ensure that the District remains committed to providing transportation in a fair and non-discriminatory manner.

FURTHER AFFIANT SAYETH NAUGHT.

Christie Finley

STATE OF _____)
COUNTY OF _____)

SWORN TO AND SUBSCRIBED BEFORE ME this the _____ day of
_____, 2019.

Notary Public
My Commission Expires: _____