



LAWRENCE QUEEN
EMPLOYMENT ATTORNEYS

BARBARA A. QUEEN | ASHLEY R. PASSERO | MARK J. PASSERO*

ALICIA M. PENN-TAYLOR** | KALEY A. PORTER

LISA K. LAWRENCE
OF COUNSEL

7th Floor
The Seventh & Franklin Building
701 East Franklin Street, Suite 700
Richmond, Virginia 23219

Mailing Address:
Post Office Box 495
Richmond, Virginia 23218-0495
Tel: 804/643-9343
Fax: 804/643-9368
Web: www.LawrenceQueen.com
Email:
apassero@lawrencequeen.com

July 14, 2025

Via Email

Garlyn Bundy
garlyn.bundy@yahoo.com
gbundy@essex.k12.va.us

Dr. Gene R. Quarles
drgrq1965@gmail.com

Re: Demand to Cease and Desist

Dear Ms. Bundy and Dr. Quarles,

Please be advised that this firm represents Doranda Scott, current Assistant Superintendent at Essex County Public Schools (“ECPS”). The purpose of this letter is two-fold. First, my client demands that you both, individually and through any third party at your direction, immediately cease and desist making false statements regarding Ms. Scott. Such conduct by you, which is described below, violates well-established Virginia law prohibiting defamation. Second, in order to prevent further harm from occurring to Ms. Scott, you must comply with the request for a complete retraction and apology as set forth below. For purposes of clarity, you will be referred to at times in the third person throughout this correspondence.

As you are both aware, on June 16, 2025, at a specially-convened Essex County School Board (“ECPS School Board”) meeting, Ms. Bundy, reading from a typed statement, proceeded to make numerous false and harmful allegations regarding Ms. Scott as well as other members of the ECPS School Board. See Exhibit A. Through a Freedom of Information Act (“FOIA”) request submitted by my office on Ms. Scott’s behalf, it has been discovered that Dr. Quarles appears to be the author, in whole or in part, of the typed statement. See Exhibit B.

As a relevant aside, Dr. Quarles and his spouse are currently subject to a “stay off property” order from ECPS due to prior alleged aggressive behaviors towards certain ECPS officials. On June 2, 2025, Ms. Bundy sought to rescind the order via email, stating, “Dr. Quarles and Mrs. Quarles stated that [they] have apologized for any past misunderstandings and have shown their commitment to working positively with the school.” See Exhibit C. In light of Dr. Quarles’s

*Also licensed in Maryland

**Also licensed in Washington, D.C.

apparent authorship of Dr. Bundy's scathing statement mere weeks later, such sentiments ring hollow.

The June 16th ECPS School Board meeting was convened for the specific purpose of allowing Ms. Bundy to resign her position on the ECPS School Board in light of allegations concerning financial improprieties and other acts by her and others. Ms. Bundy, instead of resigning, read aloud from the typed statement which from the outset expressed her "obligation and responsibility to express a series of concerns ... that raise serious questions about board governance, legal compliance, and respect for proper process." Exhibit A.

The statement went on to include an entire section attacking Ms. Scott specifically, stating that Ms. Scott engaged in a "lack of communication," "failed to respond to multiple communications," and did "not inform [Ms. Bundy] at all or in a timely manner about key actions or discussions, including those that have affected the board's functioning." Lastly, Ms. Bundy questioned Ms. Scott's professionalism and ethics, stating that it was "troubling" that Ms. Scott has "aligned herself with individuals who have openly disrespected [Ms. Bundy] rather than serving as a neutral, professional liaison...". Exhibit A.

It is highly notable that, while open sessions of ECPS School Board meetings are open to the public to attend, it is incredibly rare for ECPS School Board meetings to draw attendance above a handful of attendees, if any. The June 16th ECPS School Board meeting, by contrast, was heavily attended by 25-30 individuals. It has come to Ms. Scott's (and others') attention that Ms. Bundy solicited significant attendance at this meeting for the purpose of obtaining a wide audience to witness the defamatory statements described above. Following Ms. Bundy's statement, the ECPS School Board went into closed session, during which Ms. Bundy admitted that her statements were not based on fact but on her "personal beliefs." Put simply, Ms. Bundy knew the statements were false and made them anyway. Such actions demonstrate further the intentionality of Ms. Bundy's and Dr. Quarles's actions to cause significant personal and reputational harm to Ms. Scott.

This matter, which will continue to be investigated by my firm, is the subject of potential litigation. You must preserve all evidence reasonably relevant to the facts and claims discussed herein. This obligation requires that you refrain from deleting, destroying, wiping, or otherwise altering in any way paper or electronic files, information, or documents that you have, including those stored on devices such as computers, tablets, phones, storage media (e.g., USB flash drives, jump sticks, other hard disks), or internet accounts such as email accounts, social media accounts (e.g., Facebook, LinkedIn, X, Instagram, Snapchat, TikTok), other internet file sharing accounts (e.g., Dropbox, Google Drive, OneNote), or any other electronic data, such as voicemails or text messages. Adequate preservation requires more than simply refraining from efforts to destroy or dispose of such evidence. You must also intervene to prevent loss due to routine operations and employ proper techniques and protocols suited to protection of such evidence, including, but not limited to, disabling any auto-delete features on email or your phone.

Notwithstanding Ms. Scott's legal claims, no later than **Friday, July 18, 2025**, you both must draft a statement to be sent to me at my email address retracting and apologizing for the statements made regarding Ms. Scott, as well as providing separate assurances that you will not defame or otherwise disparage Ms. Scott in the future. Ms. Scott will seek to have your statements

read in open session at the next ECPS School Board meeting. If you are represented by counsel in this matter, please have your counsel contact me as soon as possible. If I do not hear from you (or your counsel) by the date above, I will assume you do not intend to rectify these legal violations and will advise my client as to the enforcement of her legal rights moving forward. Please note that this letter is not intended to be, nor should you interpret it as, Ms. Scott's waiver of any rights or remedies.

Sincerely,



Ashley R. Passero

cc: Doranda Scott

Exhibit A

Statement of Concerns from Chair Garlyn Bundy

Date: June 16, 2025

To: Essex County School Board

Subject: Concerns Regarding Governance, Legal Compliance, and Transparency

As Chair of the Essex County School Board, it is both my obligation and responsibility to express a series of concerns regarding recent developments that raise serious questions about board governance, legal compliance, and respect for proper process.

1. Invalid Votes by a Non-Resident Board Member

Board Member Pamela Floyd recently confirmed via email on Monday, June 9, 2025, at 11:15am, to a school employee distribution list, that she had relocated her residency. According to **Virginia Code § 22.1-29** (A school board member must be a qualified voter and bona fide resident of the school division or district he or she represents) and **Essex County School Board Policy BBAA (Qualifications of School Board Members)**, a member must be a **qualified voter and bona fide resident of the district they represent**. Once Ms. Floyd moved out of her district, she became **ineligible to serve, and her seat was legally vacated** at that moment.

As a result, **any votes cast by Ms. Floyd as of her relocation date are invalid and must be disregarded**. This includes **all board votes taken since the move outside of the district served**. To uphold the integrity of board decisions, we are required to **revisit and re-vote** on any actions taken during this period where her vote was a factor.

Pam, I respectfully ask that you excuse yourself from any further board deliberations. You stated that you will serve until June 30th. However, your position as board member ended the date that you moved and relocated outside of your serving district. I thank you for your service to Essex County and wish you well in your future endeavors.

2. Attempted Influence and Undue Pressure on the Chair

I have been approached by board members of this board requesting that I step down as Chair in order to support what I perceive as a coordinated effort to shift the board's direction. These requests appear to be part of a broader alliance that seeks to undermine the position of the Chair and improperly influence decision-making. **I will not step down under pressure** from any faction of this board. My responsibility is to uphold the law, protect the interests of Essex County's students, and maintain board integrity.

3. Transparency Violations

I am also extremely concerned by a **lack of transparency** in how board business has been handled:

- The **monthly meeting agenda** has repeatedly been prepared **without my input or consent by the Interim Superintendent**, which violates customary and procedural

norms of chair preparing the agenda and having the Superintendent or Interim Superintendent involvement as stated by Essex School Board Policy per BDDC.

- **Discussions about the Capital Improvement Plan (CIP)** have taken place without my awareness, despite a scheduled CIP meeting in March that was postponed without rescheduling or communication to me.

These are all matters that fall within the Chair's authority, and to exclude the Chair from such discussions **violates both board norms and professional standards of governance.**

4. Interim Superintendent Conduct and Lack of Communication

I must also express concern regarding the lack of communication from our **Interim Superintendent**, who **has failed to respond to multiple communications from me as Board Chair**. Moreover, the Interim Superintendent has **not informed me at all or in a timely manner about key actions or discussions**, including those that have affected the board's functioning.

It is particularly troubling that the Interim Superintendent appears to have **aligned with individuals who have openly disrespected the Chair**, rather than serving as a neutral, professional liaison between the administration and the full board. This undermines the ethical obligations of the role and contributes to a breakdown in trust and communication.

Conclusion and Call to Action

The role of the School Board Chair is to serve as a stabilizing force—ensuring that all board actions are legal, transparent, and in the best interest of Essex County's children. I am committed to fulfilling that role with integrity.

To restore order and transparency, I am calling for the following immediate actions:

1. **Formally declare Pamela Floyd's seat vacant**, retroactive to her date of relocation.
2. **Revote on all matters retroactive to the date that Ms. Floyd relocated outside of her district**, in which she participated.
3. **Reinstate proper protocols** for board agenda setting and communication with the Chair.
4. **Address the breakdown in communication** with the Interim Superintendent and clarify expectations moving forward. In addition, the Interim Superintendent will continue to fulfill the duties of the role as Interim Superintendent until midnight June 30, 2025, at which point the new Superintendent's appointment will become effective on July 1, 2025.
5. **Reaffirm this board's commitment to lawful, transparent, and ethical governance.**

I will continue to uphold my duty to Essex County with fairness, courage, and clarity. Thank you.

Sincerely,

Garlyn R. Bundy, Board Chair

Exhibit B

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Statement of Concerns from Chair Garlyn B...

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Size: 22.7 KB

Authors: G Quarles

Date modified: 7/10/2025 1:29 PM



Google Vault - [EXT] Garlyn Quick Question_

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Size: 702 KB

Date modified: 7/10/2025 12:58 PM



Google Vault - [EXT] Garlyn Receive \$20 To ...

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Google Vault - [EXT] Statement of Concerns...

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Date modified: 7/10/2025 12:04 PM

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-  **Google Vault - [EXT] Statement of Concer...** D:\FIOA Request 7-8-25 LawrenceQueen\Email\June... Size: 58.1 KB
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-  **Google Vault - Statement from June 16th ...** D:\FIOA Request 7-8-25 LawrenceQueen\Email\June... Size: 107 KB
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Statement of Concerns from Chair Garlyn Bundy 06162... X

General Details

Property	Value
Description	
Title	
Subject	
Tags	
Categories	
Comments	
Origin	
Authors	G Quarles
Last saved by	G Quarles
Revision number	17
Version number	
Program name	Microsoft Office Word
Company	
Manager	
Content created	06/15/2025 6:03 PM
Date last saved	06/16/2025 7:17 AM
Last printed	06/18/2025 11:50 AM
Total editing time	13:03:00

[Remove Properties and Personal Information](#)

OK Cancel Apply

Exhibit C

7/10/25, 12:58 PM

Google Vault - Stay off property (Quarles Family)

Stay off property (Quarles Family)

gbundy@essex.k12.va.us Garlyn Bundy

Monday, June 2, 2025 at 10:51:20 PM Eastern Daylight Time

To: dscott@essex.k12.va.us Doranda Scott, pfloyd@essex.k12.va.us Pamela Floyd, jscott@essex.k12.va.us Jonathan Scott, ssaunders@essex.k12.va.us Sharon Saunders

Good evening, I'm requesting that that we rescind the (stay off property) notice issued to Dr. and Mrs. Quarles. Their daughter, Alexander is starting her senior year, and I feel that it's important for them to be able to attend her senior year events and support her. Dr. Quarles and Mrs. Quarles stated that the have apologized for any past misunderstandings and have shown their commitment to working positively with the school. Dr. Quarles has also been an advocate for our schools with local and state leaders, reflecting on their dedication to ECPS. Rescind the (stay off notice affecting the beginning of the academic year 2025-2026) Which is what I recommended in a prior conversation so they can fully support her senior year activities and to continue to supporting our school division. Miss Garlyn Renee Bundy School Board Member, Chair Essex County Public Schools Cell number 804.366.9523 Education is the Key to Success! 🇺🇸