

THE GRAND JURORS OF THE STATE OF MARYLAND FOR THE BODY OF BALTIMORE COUNTY do on their **OATH** present that,

SHAUN DALLAS DANCE

at Baltimore County, pursuant to a common scheme and plan to conceal the nature and extent of his outside business interests and conflicts of interest, committed the offenses specified herein:

Allegations Common to All Counts

1. At all times pertinent, **SHAUN DALLAS DANCE** was employed by the Board of Education for Baltimore County (the Board) as Superintendent of Schools;
2. From on or about August 28, 2012 through and including the present, **SHAUN DALLAS DANCE** owned and operated a business entity registered in Maryland as “Deliberate Excellence Consulting, LLC,” also known as “DEC, LLC” and “Deliberate Excellence Consulting,” (hereinafter, DELIBERATE EXCELLENCE);
3. At all times pertinent, SUPES Academy, LLC (SUPES), Synesi Associates, LLC (Synesi), and ProAct Search, LLC (ProAct), were owned, operated and controlled by Gary Solomon, who owned 66 2/3% of each company, and his partner, Thomas Vranas, who owned 33 1/3% of each company. The companies were operated as a single entity, providing overlapping, integrated services and interchanging and overlapping funds, jobs and employees;
4. At all times pertinent, **SHAUN DALLAS DANCE** was required by Baltimore County School Board Policy 8364, enacted pursuant to the authority contained in the Maryland Ethics Law, §5-817, *General Provisions Article*, Annotated Code of Maryland, and in accordance with *COMAR* § 19A.05.01, *et seq.* to file a financial disclosure statement in each year with the Baltimore County Public Schools Ethics Panel (Ethics Panel), under oath or affirmation, disclosing his financial affairs and documenting his business-related transactions during the preceding calendar year on the form provided by the Ethics Panel for that purpose in order to assure the public and the Board of Education that his impartiality and independent judgment was not impaired by conflicts of interest and to guard against improper influence and the appearance of improper influence;
5. Between on or about July 1, 2012 and on or about December 4, 2012, at the instigation of the said **SHAUN DALLAS DANCE**, the Baltimore County Public Schools sought a contract with The SUPES Academy, LLC to provide customized leadership training services to the employees of the Baltimore County Public Schools;

6. Between on or about July 1, 2012 and on or about December 4, 2012, **SHAUN DALLAS DANCE** actively and directly negotiated the terms of a no-bid contract for SUPES with Gary Solomon, Thomas Vranas and Stephen Kupfer;

7. On December 4, 2012, upon the recommendation of **SHAUN DALLAS DANCE** the Baltimore County Board of Education approved a contract with SUPES for up to \$875,000.00. The contract that was signed and fully executed on December 21, 2012, was for \$175,000.00 per year for the period December 7, 2012 through June 30, 2014, and permitted up to three 1-year extensions of the contract. By amendment effective July 1, 2014, signed on behalf of the Baltimore County Public Schools by **SHAUN DALLAS DANCE**, said contract was extended to June 30, 2015;

8. From on or about January 22, 2013 through on or about March 29, 2015, the Baltimore County Public Schools made payments to SUPES on said contract totaling \$525,000.00;

9. From on or about November 30, 2012 through on or about November 20, 2013 Gary Solomon and Thomas Vranas, through SUPES and Synesi, paid **SHAUN DALLAS DANCE** approximately \$90,000.00, in part directly and in part indirectly through DELIBERATE EXCELLENCE

10. From at least November, 2012 through and including June, 2016, **SHAUN DALLAS DANCE**, in addition to his duties as superintendent, was engaged in providing consulting and other services to businesses, organizations and governmental entities, including SUPES, Synesi, Dulle Enterprises, Inc. dba Educational Research and Development Institutes, City of Providence Department of Public Schools, Tompkins-Seneca-Tioga Board of Cooperative Education Services, Richland County School District One, American Institutes for Research, Pasadena Unified School District, Pasadena Educational Foundation, Pennsylvania Association of School Administrators, and American Association of School Administrators, for compensation, individually and as DELIBERATE EXCELLENCE.

COUNT I

Perjury, 2012 Financial Disclosure

And the Jurors aforesaid, upon their oath aforesaid, do incorporate herein the allegations contained in paragraphs 1 through 10 and do further present that the said

SHAUN DALLAS DANCE

at Baltimore County, on or about February 12, 2013 did willfully and falsely make affirmation as to material facts in an affidavit required by State law and local government and governmental officials with the legal authority to require the issuance of an affidavit, to wit: did complete and submit the Financial Disclosure Form covering calendar year 2012, the contents of which were affirmed by executing the following statement thereon:

This Financial Disclosure Statement describes all interests and related transactions and matters required to be disclosed by State Government Article, Title 15, Subtitle 8 of the Maryland Public Ethics Law, COMAR 19A.05, and Board of Education Policy 8364, with respect to the period indicated and pertaining to the person filing the Statement.

I hereby make oath or affirm under the penalties of perjury that the contents of this Financial Disclosure Statement including the Schedules attached hereto, are complete, true and correct to the best of my knowledge, information, and belief.

the said **SHAUN DALLAS DANCE** well-knowing that the facts sworn to were materially false and incomplete in that **SHAUN DALLAS DANCE**:

- a. Falsely stated that during calendar year 2012 he had no interest in any corporation, partnership or similar entity well-knowing that he owned DELIBERATE EXCELLENCE during calendar year 2012; and
- b. Falsely stated that he had no sources of earned income other than the Baltimore County Board of Education in 2012, well-knowing that he received \$13,500.00 in income from Synesi and \$500.00 in income from SUPES in calendar year 2012,

in violation of §9-101 of the *Criminal Law Article*, Annotated Code of Maryland, and against the peace, government and dignity of the State.

CR 9-101 Perjury
10 years
CJIS Code 1-0307

COUNT II

Perjury, Addendum to 2013 Financial Disclosure

And the Jurors aforesaid, upon their oath aforesaid, do incorporate herein the allegations contained in paragraphs 1 through 10 and do further present that the said

SHAUN DALLAS DANCE

at Baltimore County, on or about August, 29, 2016 did willfully and falsely make affirmation as to material facts in an affidavit required by State law and local government and governmental officials with the legal authority to require the issuance of an affidavit, to wit: did complete and submit an addendum to the Financial Disclosure Form covering calendar year 2013, stating that “[n]either I nor any member of my family earned any income from DELIBERATE EXCELLENCE in 2013,” the truth of which DANCE affirmed by executing the following statement thereon:

I hereby make oath or affirm under penalties of perjury that this
ADDENDUM is complete, true and correct to the best of my
knowledge, information and belief.

the said **SHAUN DALLAS DANCE** well-knowing that the facts sworn to were materially false and incomplete in that **SHAUN DALLAS DANCE** received \$72,000.00, more or less, in payments for services rendered by him for DELIBERATE EXCELLENCE, consisting of \$63,822.72 from Synesi; \$4,999.00 from the City of Providence Department of Public Schools; and \$4,161.37 from Tompkins –Seneca-Tioga Board of Cooperative Education Services, in violation of §9-101 of the *Criminal Law Article*, Annotated Code of Maryland, and against the peace, government and dignity of the State.

CR 9-101, Perjury
10 years
CJIS Code 1-0307

COUNT III

Perjury, 2015 Financial Disclosure

And the Jurors aforesaid, upon their oath aforesaid, do incorporate herein the allegations contained in paragraphs 1 through 10 and do further present that the said

SHAUN DALLAS DANCE

at Baltimore County, on or about April 9, 2016 did willfully and falsely make affirmation as to material facts in an affidavit required by State law and local government and governmental officials with the legal authority to require the issuance of an affidavit, to wit: did complete and submit the Financial Disclosure Form covering calendar year 2015, the contents of which were affirmed by executing the following statement thereon:

This Financial Disclosure Statement describes all interests and related transactions and matters required to be disclosed by General Provisions Article, Title 5, Subtitle 8 of the Maryland Public Ethics Law, COMAR 19A.05, and Board of Education Policy 8364, with respect to the period indicated and pertaining to the person filing the Statement.

I hereby make oath or affirm under the penalties of perjury that the contents of this Financial Disclosure Statement, including the Schedules attached hereto, are complete, true, and correct to the best of my knowledge, information, and belief.

The said **SHAUN DALLAS DANCE** well-knowing that the facts sworn to were materially false and incomplete in that **SHAUN DALLAS DANCE**:

- a. falsely stated that during calendar year 2015 he had no interest in any corporation, partnership or similar entity well-knowing that he owned DELIBERATE EXCELLENCE during calendar year 2015; and
- b. falsely stated that he had no sources of earned income other than the Baltimore County Board of Education and "DEC, LLC" in 2015, well-knowing that he personally received \$12,377.00 more or less, consisting of \$5,768.97 in income from Richland County School District One in South Carolina; \$4,608.00 from Dulle Enterprises, Inc. dba Educational Research and Development Institutes; and \$1,500.00 from American Institutes for Research; and \$500.00 from American Association of School Administrators in violation of §9-101 of the *Criminal Law Article*, Annotated Code of Maryland, and against the peace, government and dignity of the State.

COUNT IV

Perjury, Addendum to 2015 Financial Disclosure

And the Jurors aforesaid, upon their oath aforesaid, do incorporate herein the allegations contained in paragraphs 1 through 10 and do further present that the said

SHAUN DALLAS DANCE

at Baltimore County, on or about August, 29, 2016 did willfully and falsely make affirmation as to material facts in an affidavit required by State law and local government and governmental officials with the legal authority to require the issuance of an affidavit, to wit: did complete and submit an addendum to the Financial Disclosure Form covering calendar year 2015, stating that “During the reporting period, neither me nor a member of my family earned any income from Deliberate Excellence, LLC.” the truth of which **SHAUN DALLAS DANCE** affirmed by executing the following statement thereon:

I hereby make oath or affirm under penalties of perjury that this
ADDENDUM is complete, true and correct to the best of my
knowledge, information and belief.

the said **SHAUN DALLAS DANCE** well-knowing that the facts sworn to were materially false and incomplete in that **SHAUN DALLAS DANCE** received \$47,000.00 in payments for services rendered by him through DELIBERATE EXCELLENCE, including of \$42,501.06 from Pasadena Unified School District in Pasadena, California; \$3,838.01 from Pasadena Educational Foundation; and \$1,000.00 from Pennsylvania Association of School Administrators, in violation of §9-101 of the *Criminal Law Article*, Annotated Code of Maryland, and against the peace, government and dignity of the State.

CR 9-101 Perjury
10 years
CJIS Code 1-0307

EMMET C. DAVITT
STATE PROSECUTOR

By: _____

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