

STATE OF SOUTH CAROLINA )  
 )  
COUNTY OF RICHLAND )

**SUPPLEMENTAL AFFIDAVIT OF  
CHALMERS EUGENE TROUTMAN, III**

PERSONALLY APPEARED BEFORE ME, CHALMERS EUGENE TROUTMAN, III,  
who, upon being duly sworn, deposes and states as follows:

1. I am providing this Supplemental Affidavit in further support of the Amended Grievance I filed dated August 30, 2007.

2. On August 17, 2007, the Clemson University Board of Trustees terminated my employment as the Board's Executive Secretary. In the letter I received, I was advised that among the reasons for this termination was my "failure to establish and maintain an effective working relationship with members of the Board, faculty representatives, and members of the University administration, including the President..." The second stated reason, namely, my role in "adding to the Internal Audit Department" has been addressed in some detail in my original Affidavit which was included in my Amended Grievance. At this time, all I wish to add about that is that established policy per the University's Unclassified Position Search Flow Chart, copy attached hereto, was followed completely; all required forms were approved and are on file. The purpose of this Supplemental Affidavit is to address more fully the claim that I failed to establish and maintain effective working relationships.

3. During the entire twenty-seven months I served as Executive Secretary, I received no admonition, no warning, no substantial criticism or other feedback from any Trustee which caused me to believe any of them were displeased with my job performance. To the contrary, the only feedback I received was positive in nature. Because I realized there might be more to be learned about their perception of my job performance, because I wanted to improve any perceived weakness or deficiency, I repeatedly asked for a job performance review. Other than

an informal review in a meeting with the Chairman on September 1, 2006 prior to the Florida – Atlantic game, I received no performance review. The first time I learned that the Chairman and some of the other Trustees were critical of my job performance was during the summer quarterly meeting in Charleston in July of 2007. Details about that are set forth in my initial Affidavit as well as the Affidavit of my wife, Robin Troutman.

4. In an earlier letter to the Trustees written by my attorney, it was represented that I had good relationships with members of the Clemson administration, with the possible exception of President Barker. My attorney went on to say that President Barker was always busy working for Clemson University, and that this could be the explanation for the lack of a close working relationship between the President and me. As I think back over the twenty-seven months that I served, the facts show I made many efforts to achieve an effective and close relationship with President Barker. An evaluation of my efforts must also weigh the President's receptiveness.

5. I first met President Barker on April 21, 2005, the day I was hired by the Trustees. Prior to that time, although we had not met, I had come to perceive President Barker as a man of high standards and strong leadership. I had learned from the University's General Counsel, Clay Steadman, a good friend of mine at the time, that President Barker wanted an Executive Secretary who would "help him get things done" and who would take initiative. Because I regard myself as that kind of person, I felt sure my relationship with President Barker would become a natural fit.

6. During the interview process, the Trustee search committee made it clear to me that their Executive Secretary is primarily responsible to the Board of Trustees. They explained that although their Secretary had responsibilities and duties in support of the President, their Secretary should not subordinate himself to the President's agenda to such a degree that the

needs of the Trustees came second. I recall assuring the Chairman and the search committee that in my prior experience and during my thirty years of prior employment, I understood the need to address the expectations of my employer, namely, the Trustees, as well as those of my client, the President and the administration. I felt being able to handle and distinguish those type of relationships had accounted for my success in dealing with numerous Fortune 500 organizations and major federal agencies on behalf of my previous employer, Fluor Corporation.

7. I made a number of extraordinary efforts and personal initiatives to build and foster an effective and harmonious relationship with President Barker. I recall that on the fourth day of the first week of my employment, I had my first scheduled meeting with President Barker in his office. He wished to discuss the role of Executive Secretary to the Board and how that position was perceived by the Board. He also wished to discuss how my predecessor, Thornton Kirby, had filled the position. He stated he wanted to clarify some misconceptions regarding the working relationship between him and Mr. Kirby. President Barker explained that the Board, in his view, had perceived that Thornton Kirby was doing more work in his role as an Executive Assistant to the President than in his role as Executive Secretary to the Board. He explained this was more a matter of perception than reality. I recall him saying that although Thornton Kirby said he had done a lot for the President, "he, in fact, did not do that much." President Barker stated that in order to avoid this perception, he had come up with the idea of having four Assistants to the President combined as "one." I confirmed with President Barker the instructions I had received from Chairman Hendrix that I should remember "who came first." I recall telling President Barker that I believed I could better serve the Trustees if I could stay advised of administrative activities because I would be able to keep them updated. President Barker and I agreed that I should request and receive Chairman Hendrix's approval to serve as

“Assistant to the President” while, at the same time, serving as Executive Secretary to the Board. I recall that I spoke with Chairman Hendrix that same day about the matter. He was on campus for the spring graduation ceremonies. After I explained my conversation with President Barker, Chairman Hendrix expressed his complete agreement and approval.

8. I made every effort to support and help President Barker’s staff. I recall President Barker telling me that a number of Trustees apparently did not think highly of Cathy Sams. He stated that several of them had expressed the view that she was not the best person to be in charge of the University’s public relations efforts. President Barker expressed to me his view that the Trustees did not have an accurate view because of their lack of interface with Ms. Sams. I recall telling President Barker that I would help him by showing visible support for Cathy Sams and speaking well of her when I was with the Trustees.

9. Shortly after assuming my position as Executive Secretary and Assistant to the President, I learned that President Barker did not utilize a “walking around” management style. I noticed he did not engage in impromptu conversations or unscheduled visits. I learned that all dialogue had to be scheduled. Even though our offices were close to each other, I came to learn that opportunities to talk with President Barker were restricted. This was vastly different from the office relationships and office settings I had been a part of in the past. I accepted this office arrangement graciously and never made any complaint or adverse comment. I did feel, however, that I had a communications barrier to overcome. I tried to learn more about President Barker’s day-to-day management style by discussing it with Clay Steadman. I recall that Mr. Steadman was relieved by my observations. He stated he had experienced the same thing. We agreed that President Barker preferred to initiate conversations at times of his choosing and did not choose to engage in response to any overture made outside of an appointment. Clay advised me that I

should be sparing in my requests for his time and not expect scheduled meetings, a suggestion which I took. Had it been up to me, I would have had more meetings and more interface with President Barker. Any perceived lack of strength or depth in the relationship between me and President Barker was not of my choosing.

10. I supported President Barker's initiatives despite some opposition by fellow administrators. As I recall, during my second week on the job, President Barker launched his "Special Assistants Team." The four Assistants to the Presidents were Clay Steadman, Cathy Sams, Marvin Carmichael and me. I recall our first meeting in the President's office. President Barker acknowledged the perceived strength of each one of us and stated the area of expertise he expected from each. President Barker stated my perceived area of expertise as being my corporate experience and business skills. Our "Four-X Team" started meeting on a weekly basis. One of our first initiatives was to relieve some of the email burden and calendar demands on the President. I learned that the President did not do email. He preferred for his daily emails to be printed and delivered to him in hard copy. He then sorted it into two groups, namely, those that required a response and those that did not. Email responses were most often prepared by Elizabeth Hart, with the help of Cathy Sams. The President's calendar was kept and managed by his Administrative Assistant, Sandy McKinney. The Four-X Team improved the process and worked to help relieve burdens and responsibilities of the President. As the idea of the "Four-X Team" became known by others in the administration, it was not well received. I recall that the mission Vice Presidents, namely Dori Helms, John Kelly and Chris Przirembel may have had reservations. Nevertheless, I and other members of the Four-X Team worked especially hard to do what we could to support the President, relieve the burdens on him, and mollify the concerns of others.

11. I undertook the weighty responsibility of preparing the President's performance evaluation. I learned that one of the Executive Secretary's jobs was to prepare and complete the annual Agency Head Performance Plan and Evaluation documents required by the Agency Head Salary Review Commission of the State Budget and Control Board. Very soon after I took the position, Chairman Hendrix instructed me to teach myself the required process, meet with President Barker, obtain the President's assistance and have a draft ready for his review at the summer quarterly meeting of the Board of Trustees. Chairman Hendrix emphasized that he expected this review to reflect extraordinary excellence so that the maximum salary increase for the President could be obtained. He explained that this was one of the Board's commitments to the President. I worked hard on this evaluation. In May of 2005, I scheduled a meeting with President Barker to discuss how we could work together and develop a report on his achievements. President Barker explained to me that I could develop that report without him. I felt I was at a disadvantage as I was a new employee without a great deal of knowledge and experience about the past year on which I was required to report. Nevertheless, I accepted the charge, prepared the evaluation, delivered the documents, and achieved the Trustees' goal. President Barker received an "extraordinary increase" from the Agency Head Salary Review Commission. I did not receive any feedback from President Barker during this effort or any comments on its successful results.

12. I made a special effort of passing along to the President all special requests or news I received from the Trustees. I immediately conveyed Trustee news to Sandy McKinney, the President's Administrative Coordinator. Only rarely did I have the opportunity to speak directly to President Barker. He maintained a closed office door and made it clear he did not like to be interrupted. I respected his wishes and did not interrupt him unless specifically instructed

to do so. I supported the development of harmony among the office staff. Because both the President's office and the office of the Executive Secretary to the Board are located within Suite 201 of Sikes Hall, both support staffs work side-by-side. Upon my arrival in my new office, I was advised by Marvin Carmichael that there was some disharmony between the President's staff and the Executive Secretary's staff. The President had three full-time Administrative Coordinators, as well as some part-time student help. The Executive Secretary's staff consisted of one Administrative Coordinator. I soon learned that my Administrative Coordinator was frustrated by not having any dedicated help. I immediately undertook to remedy that situation by transferring my Administrative Coordinator to another assignment and replacing her with a prior and very successful holder of the job, who I recruited to return to the job. I had earlier been instructed by several of the Trustees that I should staff my office however I thought best. This move was accomplished within the first four to six weeks of my new job. The transition was smooth and without incident or complaint. I was very pleased to hear from President Barker that he was "absolutely amazed" with this successful change in the staffing and that he realized that it could have been a personnel problem. At this time, I took the opportunity to express my opinion that my office was understaffed by at least one person. He asked that I try temporary help and evaluate the matter further. I deferred to his request as a good will gesture. I recall he emphasized how important it was for him that the women in the office get along with each other. I recall telling him that I agreed and I would work hard to achieve that goal. Thereafter, I never received from the President, any comment, positive or negative, about office staff.

13. I worked hard to help President Barker with his fine art reproduction projects. By August, 2005, I was aware that President Barker was beginning to experiment with watercolors and that he produced sixteen watercolor sketches while on a July, 2005 alumni trip to the Greek

Islands. I learned he wanted to reproduce these sketches and give them to the Trustees who also made the trip. I offered to help him. I shared with him my interest in fine art and printmaking. I introduced President Barker to the new giclee process, which had significant technical and artistic superiority to the lithograph process. Giclee uses an especially designed digital ink-jet printer and sheets of museum quality watercolor paper. President Barker was pleased about the prospect and welcomed my offer. The effort took approximately four months. It required the securing of a contract with Steven Greenfield Printing Company, the same company that prepares such prints for Hubert Shuptrine, a nationally-acclaimed watercolorist. I helped coordinate the design layout and the proof production of the sixteen images for the President's approval. This project also involved the selection of eight images from the overall sixteen for individual print production. I set up a survey/focus group of approximately fifteen co-workers to identify the images which had the most appeal. I recall the total printing and paper costs for these two projects, prior to framing, was \$8,371.84. The original quote from Mr. Greenfield for this work was \$23,808.00. My efforts saved the difference between the two sums and resulted in better quality prints. Although my extra hours of work on this were significant, the experience did not provide me with much direct contact with the President. I learned that he preferred that I leave the proofs in his office for his review and approval. Unfortunately, during this nearly four month long process, I was not able to achieve any more contact with the President. I was disappointed that the President took no opportunity to acknowledge my efforts or express gratitude. There were seventy finished prints produced. I did not receive one. Approximately six months later, President Barker requested that I produce another giclee project for him. I responded I would be happy to undertake that project. I had some new ideas which I thought might further please him. This project involved a composition of watercolor sketches he had



done in Napa Valley, California while attending the wedding of Ron and Carol Oakley's son. I helped to identify and develop a Greenville resource for the effort and for future projects. I recall this approach allowed Marcia Barker, the President's wife, to get involved and to help facilitate the print reviews with the printer.

14. I undertook a wider assortment of jobs and responsibilities than was originally contemplated. I learned from Clay Steadman that there was some discussion to possibly reshape the job of Executive Secretary by reassigning the responsibility for Institutional Research, Institutional Effectiveness, and Access and Equity. I advised Clay Steadman that I did not object to having those responsibilities. For unknown reasons, the proposed changes were never made. I learned later that because of the intent to make changes, the decision was made to offer me a salary which was less than that paid to the previous Executive Secretary. My job responsibilities included, up until the time of my termination, responsibility for Institutional Research, Institutional Effectiveness, and Access and Equity.

15. I demonstrated and expressed support for the President's annual plan. As an executive officer on the Administrative Council with the administrative responsibilities for four significant units integral to the overall administration goals, I would normally have been involved in the President's annual program of meetings with the heads of all units to plan strategy and to set goals. As this activity picked up in the fall of 2005, I learned I would not be invited or requested to submit an annual plan. It was obvious that this put me in an administrative disadvantageous position. I discussed this matter with the Interim Chief Business Officer, Steve Copeland, and I sought his advice. He explained since he was new in his job as well, he did not know how things had been handled previously. I decided to let the matter go. I

worked without complaint and attempted through a number of suggestions to receive some feedback from the President on my responsibilities under his purview.

16. I undertook a special effort to help President Barker obtain a special cemetery plot at Woodland Cemetery. It is well known that Woodland Cemetery has limited space. Its location on the campus, just behind Memorial Stadium, makes it very prestigious. It is a favorite destination for tourists on the campus. A recent project to improve its gates added more prestige. The bodies of many past-Clemson greats are buried there. Early in 2007, it came to my attention that President Emeritus Phil Prince did not require the entire plot which had been assigned to him. I learned he wished for the unused portion of his plot to remain in a natural state. I studied the established policies for the cemetery and learned that once plots are relinquished, they cannot carry any restrictions by the prior owner. I discussed this situation with President Emeritus Prince. I suggested to him that if he did not need a portion of his plot, it could be separated so that a new plot could be created which in turn could be offered to President Barker. I noted that the location of this plot was in the area where a number of famous former Clemson Presidents were interred. Mr. Prince agreed with this proposal. I worked with the University landscape architect to configure the plot. I submitted the final newly-configured plots to President Prince for his approval. After they were approved, I advised President Barker that if he wished, I could reassign his relatively obscure current plot and provide him with a much more distinguished plot. President Barker agreed with this, but he did not express any appreciation for the gesture. I was disappointed that this effort I undertook for him personally did not enable me to have a closer or better relationship with him.

17. I worked especially hard on behalf of the President's office to provide a special gift from the University to Dr. Richard Sosnowski, the honorary degree recipient in December,

2006. One of the duties of the Executive Secretary to the Board is to plan and schedule the social events which are part of the awarding of an honorary degree by the University at one of its commencement exercises. This effort involves communication directly with the recipient and his or her family to determine any special guests, requests or other needs. In planning the ceremonies for Dr. Sosnowski, I learned from one of his children that when he graduated from Clemson in 1942, he did not receive the customary saber given to all Company Commanders due to the war rations efforts at that time. Ceremonial sabers were not available then. I saw this as the unique opportunity to offer a special gift to Dr. Sosnowski from the University. I was well aware of President Barker's special "sword story." He has often said that he decided to come to Clemson because he learned as a little boy that graduates of Clemson receive a sword. I was well aware of the special value and prestige of sabers, as I had been a Battalion Staff Officer at Oak Ridge Military School, from which I graduated in 1968. I worked with Clemson's ROTC Office, did research on sabers, and was able to procure a saber for Dr. Sosnowski with his name inscribed upon it. I then worked with the Advancement Office to coordinate an event for the President and Dr. J.J. Britton to deliver this saber to Dr. Sosnowski. I recall it being a very special occasion. I do not recall that this event or my efforts resulted in any recognition of appreciation from the President. I had hoped that it would have improved our relationship.

18. I made special efforts to attend all ceremonial and social functions. As Executive Secretary, I made every effort to attend as many University ceremonies as possible. For example, I never missed a commencement exercise. I was proud to walk in the procession with the Trustees. As a member of the Administrative Council, my wife and I were invited to many University social functions. Although many members on the Council did not perceive their attendance as required, I understood and believed that the President expected administrative

council attendance. I considered attendance at such functions as part of my job responsibility. My wife always attended those events with me, and together we enjoyed becoming a part of the Clemson family. I also attended many meetings of the Faculty Senate, the Student Senate, and meetings of Blue Key, of which I was made an honorary member after being hired as the Executive Secretary.

19. In addition to all of these special efforts, I also tried diligently to meet or exceed all expectations anyone had of me. I know of no other Clemson employee who outworked me. I therefore believe, with all due respect, it was pretextual to allege that I had to be fired because I failed to establish and maintain an effective working relationship with members of the Board, faculty representatives, members of the University Administration or the President.

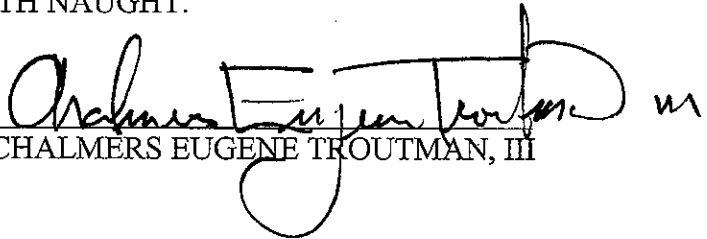
20. Although it was represented to my attorney that there was "a basketful of emails" expressing "pent-up frustration" about me, we later learned that there is, in fact, not even one such email. I believe a deliberate effort was made to discredit me in the eyes of my attorney. I also believe a deliberate effort was made to make it appear that there were *bona fide* reasons for the Board of Trustees to conclude that I was not working out as their Executive Secretary and that I had to be replaced. In truth, the decision to ask for my resignation and the subsequent decision to terminate me was an inappropriate and unwarranted overreaction to the decision to create the new position of Executive Director of Fiscal Control/Policy Compliance and to fill that position with the former Clemson Budget Director, the most knowledgeable person at the University about the finances and budget, Alan Godfrey. I have previously addressed the steps I took and the approval I received for the creation and filling of this position. I remain convinced

that this position and the expertise Alan Godfrey brought to that position would be very much in the best interests of Clemson University and the State of South Carolina.

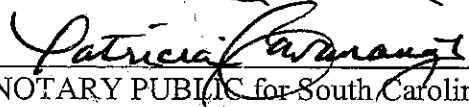
21. I have come to understand the legal protection afforded by the law and the public policy of South Carolina for well-intended State employees who engage in activities which can be regarded as "blowing the whistle." Based on my understanding of the First Amendment to the United States Constitution, I have the right to speak out about situations and actions which involve the improper use or improper collection of public funds.

I submit that I fall within the ambit of that legal protection. I further respectfully submit that my civil rights have been violated if I am not afforded the opportunity to be reinstated in my position as Executive Secretary to the Clemson University Board of Trustees.

FURTHER, YOUR AFFIANT SAYETH NAUGHT.

  
CHALMERS EUGENE TROUTMAN, III

SWORN to and SUBSCRIBED before me  
this 13<sup>th</sup> day of SEPTEMBER, 2007

 (L.S.)  
NOTARY PUBLIC for South Carolina

My Commission Expires: 1-28-14

# UNCLASSIFIED POSITION SEARCH FLOW CHART

