



October 24, 2025

The Honorable Ken Paxton
Attorney General of Texas
P.O. Box 12548
Austin, Texas 78711-2548

Re: Request from State Representative Jeff Leach

Dear Attorney General Paxton,

This letter is written on behalf of the Celina Independent School District ("Celina ISD" or "District") regarding the letter sent to you from State Representative Jeff Leach ("Representative Leach") on October 23, 2025, requesting the Office of the Texas Attorney General ("OAG") open an investigation into the Celina ISD. In his letter to the OAG, Representative Leach commending the District for opening its own independent third-party investigation into this matter. However, Representative Leach requested a "fully independent and outside criminal investigation" be commenced. The District and Representative Leach did not communicate prior to his letter to the OAG, so the District is providing the OAG and Representative Leach an update on the status of all pending investigations in this matter.

Representative Leach referred to the pending matter involving previous employee Caleb Elliott. On October 3, 2025, the District was notified by the Celina Police Department ("CPD") of the arrest of William Caleb Elliott, a previous teacher at Celina ISD Moore Middle School. Mr. Elliott was arrested and charged with Invasive Visual Recording, a State Jail Felony. Upon further investigation by the Criminal Investigation Division of CPD, an additional arrest warrant was obtained for a new offense. Mr. Elliott turned himself in October 9, 2025, and was immediately booked into the Collin County Jail for Possession or Promotion of Child Pornography, a Felony of the Second Degree. The District has, and will continue to, fully cooperate with CPD in the course of their criminal investigation.

The District has demonstrated its commitment to aggressively pursuing resolution of the allegations and actions necessary for the well-being of our students, including immediately initiating an independent third-party investigation, promptly ending Caleb Elliott's employment with the District, and requiring Caleb Elliott to surrender his

teaching certificate to the Texas Education Agency State Board for Educator Certification as a condition of accepting his resignation.

In consultation with the Board President, I determined that it was important for the District to retain the services of Ms. Giana Ortiz as an independent third-party attorney to review this matter. On the first business day after notification by CPD of the allegations against Mr. Elliott, the District retained Ms. Ortiz and she began her work to conduct an investigation into questions surrounding this matter. Ms. Ortiz is not investigating the underlying criminal charges against Mr. Elliott, as it is critical the District not interfere with a criminal investigation and, if applicable, prosecution. I believed it was important to have a neutral, third-party investigation to avoid a conflict of interest, if any. Ms. Ortiz is not an attorney that represents school Districts and was specifically selected for her reputation of excellence in her representation of clients before school boards, administrative law judges, the Texas Education Agency, district courts, courts of appeal, and the Texas Supreme Court. Ms. Ortiz is an alumna of the State Bar of Texas Leadership class, former Chair of the State Bar of Texas Court Rules Committee, the Chair of the State Bar's School Law Section, and is a member of the Texas Supreme Court Advisory Committee, appointed by the Supreme Court of Texas. The investigation conducted by Ms. Ortiz is specifically to ensure Texas law was complied with and, if not, to provide findings that would support appropriate action to hold individuals accountable if they were required to act and failed or refused to do so.

One of the primary purposes for the District retaining an independent third-party to conduct the investigation was to ensure there was no possibility of a conflict of interest or effort to "cover up" information regarding the students' claims. The District's independent third-party investigation includes answering questions regarding the hiring, retention, and assignment(s) of Caleb Elliott in the District. The scope of the independent third-party investigation includes, but is not limited to, determining if / when claims were made regarding Caleb Elliott, the District's response to claims regarding Caleb Elliott, identifying individuals involved in decision-making regarding Caleb Elliott's employment, and identifying any systemic issues that may exist regarding these matters. Following review of the lawsuit filed on behalf of affected Moore Middle School students, the District also asked the investigator to incorporate the allegations raised in the petition into the investigation, excluding criminal issues under review by the Celina Police Department.

Additionally, CPD is currently conducting a full and independent investigation into the allegations against Mr. Elliott. Further, in support of Celina ISD's commitment to transparency in this matter, I confirmed with CPD Chief John Cullison the District's request that CPD fully investigate any additional and/or ancillary criminal matters regarding the District if CPD determines further investigation is necessary. Based on CPD's commitment to look fully into any criminal action by Mr. Elliott or any other third parties, the District encourages the OAG to contact the CPD to determine what assistance may be needed by CPD complete its full and independent criminal

investigation(s) in this matter.

Finally, based on the independent third-party investigator's preliminary review and initial interview(s), the investigator expressed a concern that certain employees' presence at the District could compromise the integrity of the investigation. Specifically, Ms. Allison Ginn and Coach Bill Elliott have been identified in the hiring and/or supervision of Caleb Elliott (either directly or indirectly). To be clear, the investigator has not made findings in any respect; however, based on her preliminary review, and in an abundance of caution, she recommended the District consider placing both employees on non-disciplinary leave pending completion of the independent third-party investigation. The District followed the recommendation and placed Ms. Ginn and Coach Elliott on non-disciplinary administrative leave with pay on October 24, 2025, pending completion of the independent third-party investigation.

Celina ISD remains steadfast in our commitment to the safety, trust, and well-being of every student. Celina is a community that faces challenges together, supports one another, and grows stronger through open communication and care. The District's commitment to these priorities has not and will not change. The District is committed to transparency and working closely with the Celina Police Department while not interfering with their investigation.

Respectfully,



Tom Maglisceau, PhD

Superintendent, Celina ISD

Cc:

State Representative Jeff Leach

Chief John Cullison, Celina Police Department