

New Jersey Department of Education  
Bureau of Controversies and Disputes

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In the Matter of:	:	
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Watchung Borough Board of Education	:	Opinion and Order Re:
	:	Motion to Dismiss
Tenure Charges Against	:	Agency Docket No. 112-520
	:	
Christopher Riley	:	

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Before: Robert H. Barron, Esq.  
Arbitrator

Appearances

For the Watchung Borough Board of Education  
By: Kerri A. Wright, Esq.  
David L. Disler, Esq.  
Porzio, Bromberg & Newman P.C.

For Christopher Riley  
By: Keith Waldman, Esq.  
Hop Wechsler, Esq.  
Selikoff & Cohen, P.A.

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Pursuant to the Teacher Effectiveness and Accountability for the Children of New Jersey Act (“TEACHNJ”), P. L. 2012, c. 26, N.J.S.A. 18A:6-115 *et seq.* and regulations adopted thereunder by the New Jersey Department of Education (“DOE”), this Arbitrator was appointed by letter dated June 11, 2020 from Jennifer Killough-Herrera, Director, Office of Controversies and Disputes, to hear and determine arguments regarding Tenure Charges (“the Charges”) filed by the Watchung Borough Board of Education (“the Board) against Christopher Riley (“Respondent”).

On May 26, 2020, by letter to Lamont Repollet, the DOE’s Commissioner of Education, the Board filed Tenure Charges against Respondent requesting his termination for unbecoming conduct, along with supporting documentation. On June 9, 2020, in lieu of filing an Answer, Respondent filed a Motion to Dismiss the Charges along with supporting documentation (the “Respondent’s Initial Brief). On June 26, 2020, the Board filed a letter brief (the “Board’s Brief”) in opposition to the Motion, along with a Certification from the School District’s Superintendent, George P. Alexis. On July 7, 2020, Respondent filed a letter Reply Brief (the “Respondent’s Reply Brief”). At that point, briefing was closed.

### **Facts**

The Charges allege the following:

(1) Respondent was a tenured teacher at the Valley View Middle School. On March 8, 2019, Linda MacLeod, a school guidance counselor, came upon Respondent in the school’s hallway. Respondent told her he “just want[ed] to kill these sixth graders”, that the students were “driving him crazy”<sup>1</sup>, and he “just want[ed] to kill these kids”. (Charges at paragraphs 5 and 6). He mentioned two students by name. Neither student was identified in the Charges (although both appear to be identified in the Investigation Notes attached to the Charges). During that conversation, Respondent banged his head against the wall and put his head in his classroom door and closed the door on his head. A hallway security camera recorded the conversation, without audio.

(2) Respondent then entered his classroom and “appeared visibly sad”. (Charges at paragraph 9) The Charges did not identify who made that observation. An unidentified student subsequently reported to the paraprofessional in the room that Respondent said he “wanted to kill

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<sup>1</sup> The Charges are unclear whether Respondent allegedly made this statement to MacLeod (Charges at paragraph 5), in front of the students (Charges at paragraph 25), or in front of both MacLeod and the students.

himself”. (Charges at paragraph 10) The Charges did not identify who reported that the student talked to the paraprofessional or who reported what the student said. Other unidentified students went to the school Nurse “because they were deeply upset by what they heard and witnessed”. (Charges at paragraph 11) The Charges did not identify who reported that students went to the Nurse or who provided the explanation for why they went to the Nurse.

(3) MacLeod reported Respondent’s behavior to the Principal, Mary Nunn. The Nurse also reported to Principal Nunn that unidentified students came to her because they were upset by Respondent’s behavior. The Charges did not identify who reported the Nurse’s conversation with Principal Nunn. Principal Nunn went to Respondent’s classroom where she observed him “clenching his hand’ in front of the students”. (Charges at paragraph 14) She told Respondent he needed to leave his classroom, which he did.

(4) Immediately after the incident, Respondent was placed on paid Administrative leave, and directed to undergo a psychiatric evaluation by a doctor selected by the Board. In the Doctor’s March 8, 2019 report, he found that, Respondent engaged in “aggressive acting out”, and “fear inducing self-destructive behavior”. (Charges at paragraph 19) The Doctor also concluded that the behavior was not likely to repeat itself but recommended that Respondent remain out on leave until a follow up examination was administered. In the Doctor’s September 19, 2020 report of that follow up examination, he concluded that Respondent was not suffering from severe affection disorder or severe depression.

(5) On April 20, 2020, Superintendent Alexis filed tenure charges with the Board against Respondent, including supporting documentation. The Charges alleged conduct unbecoming a teaching staff member. On May 7, 2020, Respondent filed his statement of position in opposition to the Charges. On May 11, 2020, the Board held a virtual meeting and voted to uphold the

Charges. The Board concluded that, based on the Charges and supporting evidence, Respondent had engaged in conduct unbecoming a teaching staff member in violation of N.J.S.A. 18A:6-10, and he failed to create a classroom environment that was conducive to learning as required under his job description.

In support of the Charges, the School District presented 21 pieces of evidence. These included, unsigned, handwritten notes that were identified in the Superintendent's Exhibit List as "Written Investigation Notes", a typed statement with MacLeod's name typed at the end, various correspondence related to Respondent's administrative leave, the examining Psychiatrist's two examination reports, School policies covering "inappropriate Staff Conduct" and the "Code of Ethics", and the video of the hallway meeting between Respondent and MacLeod, without sound.

The exhibits did not include any signed or unsigned statements or certifications from the individual(s) who investigated the incident or from any witness, including the Paraprofessional, Nurse, or Principal, all of whom are referenced in the Charges as having been involved in a portion of Respondent's alleged unbecoming behavior. The typed MacLeod notes includes only one of the specific statements the Charges allege Respondent made to her in the hallway, and it is not signed or certified. The handwritten Investigation Notes are difficult to read, do not identify who wrote them and do not identify who was reporting what the note taker was writing. Finally, the Charges and exhibits do not identify how Superintendent Alexis determined the facts set forth in the Charges.

### **The Respondent's Initial Position**

Respondent argues that the evidence filed by the Board in support of its claim that he engaged in conduct unbecoming in fact supports his position that he did not engage in conduct unbecoming. He maintains that the evidence shows that his actions were the result of his diagnosed

disability as defined under the New Jersey Law Against Discrimination. He concludes that the Board failed to make any showing that his conduct harmed the school's morale, efficiency or public perception.

Respondent asserts that the Board's Psychiatrist, in two separate examinations, found that Respondent's recovery was satisfactory, and that he was fit to return to work. Based on the Psychiatrist's findings, Respondent concludes that the Board was required to return him to work. Instead, the Board improperly substituted its unfounded fears and prejudices for the evidence-based conclusions of its chosen Psychiatrist and failed to meet its obligation to return him to his position.

Respondent maintains that the Charges are also procedurally defective, as they contain no competent, credible documentary evidence to support the allegation that Respondent engaged in conduct unbecoming. Respondent rejects the Investigation Notes, arguing they are hearsay, and points out that the Board did not identify who took the notes, any circumstance surrounding their taking, or any information regarding whether or how an investigation was conducted. Respondent also maintains that there are inconsistencies between the notes and MacLeod's typed statement.

Respondent also raises a procedural defect regarding Superintendent Alexis' presentation of the Charges, arguing that he had no firsthand knowledge regarding the facts set forth in the Charges. Respondent notes that Superintendent Alexis was the Principal at a neighboring district's High School at the time of the incident and did not fill his Superintendent roll until October 2019. As a result, he had no basis to certify that any of the facts in the charges were true.

Respondent cites and quotes two cases in support of his position that the procedural deficiencies support dismissal of the Charges:

*Matter of Bd. of Educ. of Tp. of Barnegat, Ocean Cty. and Kevin Karp* , Agency Dkt. No. 102-4/16 (May 26, 2016) (Gerber, Edmund, Arb.) (dismissing tenure

charges in relevant part because "[t]he Superintendent...swore to a statement of evidence and signed under oath the tenure charges but **nothing in the record indicated she directly participated in the investigation** of the student's complaints or talked to any of the students and/or their parents...[N]o signed written statement by someone with direct knowledge of the alleged events was ever presented to the Board. The tenure charges were certified on the basis of double hearsay"); *Matter of Tara Trongone, Bd. of Educ. of the City of Gloucester City, Camden Cty.*, Agency Dkt. No. 173-6/16 (Sept. 12, 2016) (De Treux, Walt, Arb.) (dismissing tenure charges in relevant part because "the sworn Statement of Evidence by [the] Superintendent...is inadequate as **he had no direct knowledge [of] or participation in the investigation**").

(Respondent's Initial Brief at 9, emphasis in Brief)

Finally, Respondent argues that the Charges omit and mischaracterize many key facts, documents, and other information. In particular, he asserts that the Charges fail to state that he denies threatening to kill, injure or harm any students, and omits the portions of the Psychiatrist's report that support his ability to safely return to work. He also argues that given his disability, even if he had made the alleged statements, they should not have been taken seriously as threats to act, but rather as venting frustration.

### **The Board's Position**

The Board argues that the Charges are sufficient and should not be dismissed. It maintains that the Commissioner of Education resolved this issue in the June 11, 2020 transmittal of the matter to this Arbitrator. That transmittal stated in part:

[F]ollowing receipt of respondent's motion to dismiss on June 9, 2020, **the above captioned tenure charges have been reviewed and deemed sufficient, if true, to warrant dismissal or reduction of salary**, subject to the arbitrator's decision on the motion.

(Board's Brief at 2, emphasis in Brief)

It concludes that, pursuant to N.J.A.C. 6A:3-5.5, the Commissioner's conclusion and transmittal resolves any question regarding the sufficiency of the Charges.

The Board rejects the argument that the Charges should be dismissed because the Superintendent had no direct knowledge of the facts underlying them. In support, it offers into

evidence Superintendent Alexis' June 26, 2020 Certification, which outlined the steps he took to investigate the incident after he became Superintendent. These included talking to witnesses with first-hand knowledge and reviewing the hallway video.

The Board distinguishes this case from the *Karp* and *Trongone* cases cited by Respondent. It argues that in *Karp*, the Charges provided no information regarding when the alleged conduct occurred, while the Charges and supporting documentation in this case, including the video, provide the specific information necessary to put Respondent on notice of the incidents that gave rise to the Charges. The Board distinguishes *Trongone*, arguing that, unlike the Superintendent in *Trongone*, Superintendent Alexis interviewed the witnesses and reviewed the exhibits prior to sending the Charges to the Board. It further asserts that the New Jersey Code does not require that the administrator who conducted the investigation sign the Certification or that the Superintendent signing the Certification have firsthand knowledge of the facts.

The Board also rejects Respondent's argument that because the Investigation notes are alleged to contain hearsay, the Charges must be dismissed. It argues that hearsay is admissible, and that it is up to the fact finder to determine the weight it should be given. It also maintains that Respondent's hearsay objection applies only to the Investigation Notes, and that the proper forum to contest the value of those notes is the hearing.

In support, the Board quotes *I/M/O Tenure Hearing of Michelle Gates*, Agency Dkt. No. 144-5/16 (Gerber, 2016) (*quoting N.J.A.C. 1:1-15.5(b)*):

Hearsay evidence shall be admissible in a trial of contested cases. Hearsay evidence which is admitted shall be accorded whatever weight the judge deems appropriate, taking into account the nature, character and scope of the evidence, the circumstances of its creation and production and generally its reliability. While generally, in order to accord hearsay evidence its full weight, there must be a residuum of legally competent evidence to support each ultimate finding of fact, known as residuum rule.

The Board challenges Respondents numerous examples of alleged contrary facts that were not included in the Charges. It argues that Respondent's factual allegations should not be considered in deciding this Motion. Rather, they are arguments that Respondent must make at a hearing. Moreover, it points out that Respondent had the opportunity to provide his version of the facts to the Board before it made the decision, and that he exercised that right.

Finally, the Board maintains that the Charges clearly state a cause of action against Respondent for conduct unbecoming. It asserts that:

Numerous arbitrators and the Commissioner of Education have previously held that indirectly making inflammatory remarks about students to a colleague does not insulate a teacher from discipline for "completely unprofessional" behavior. For example in *Geiger*, the Arbitrator held that:

Notwithstanding [the teachers'] assertion **that there was no deliberate exposure to the students or the public at large, the reality is that students did in fact hear** [them] using the inflammatory term. As a result there was a direct impact to the school environment ... [and] the Commissioner finds that the [teachers] are unfit to discharge the duties and functions of their positions as teachers.*I/M/O Tenure Hearing of Geiger*, OAL Dkt. No. EDU 5974-12, Comm'r (Oct. 7, 2013), *affirmed in part, reversed and remanded on degree of penalty*, 2015 N.J. Super. Unpub. LEXIS 2649 (App.Div. Nov. 18, 2015).  
(Board's Brief at 8, emphasis in Brief)

The Board cites numerous additional arbitration decisions in support of its position that the Charges state a cause of action. Finally, the Board argues and cites cases in support of its position that, while there is no explicit legal standard for what constitutes a "sufficiently flagrant" incident, tenure charges have been upheld for a single event.

### **The Respondent's Reply**

Respondent rejects the Board's argument that, because of the Commissioner's language transmitting the Charges, the question of the Charges' sufficiency has already been resolved. In



support of his position, Respondent notes that the transmittal language states that sufficiency is “subject to the arbitrator’s decision on the motion”.

Respondent also disputes the Board’s arguments that the Charges are not procedurally defective. He asserts that Superintendent Alexis’ July 26, 2020 Certification, describing the steps he took to review the evidence in this case, does not cure the procedural defect, as the Board was obligated to submit all of its supporting evidence with the Charges, and the July 26 Certification was submitted after the fact. In support, Respondent cites and quotes:

*Matter of the Tenure Arbitration Between Sch. Dist. of Camden Cty. Tech. Schs. and Brett Fetty, Agency Dkt. 173- 7 /19 at 11-12 (Sept. 3, 2019) (Zudick, Arnold H., Arb.) (“[A] board's obligation to submit all evidence it intends to rely upon when filing tenure charges is a statutory requirement... There is no provision I am aware of in the TEACHNJ statutory scheme that provides that a board can amend or supplement its original statement of evidence after filing charges in order to subsequently comply with N.J.S.A. 18A:6-11 and N.J.S.A. 18A:6-17.1(b)(3) after having originally failed to comply with those statutes”).*

(Respondent’s Reply Brief at 2)

Respondent also maintains that even if the Superintendent’s Certification is considered in deciding this Motion, his lack of firsthand knowledge of the facts and the investigation nonetheless renders the Charges procedurally flawed and insufficient under N.J.S.A. 18A:6-11.

Respondent asserts that while his hearsay objections are focused on the Investigation Notes, those notes are central to the Boards’ case, and that the video and the other submitted evidence either fails to support those notes or refutes them. He concludes that since the Investigation Notes are critical to the Charges, their abundant hearsay renders the Charges procedurally defective.

Finally, Respondent challenges the Board’s claim that it was inappropriate for him to include facts in his briefs that conflict with and were not addressed by the Charges. He maintains that the inclusion of those facts illustrates the procedural defects in the Charges, as the Board was

obligated to consider all of the facts relating to this incident, and its failure to do so was itself a procedural defect. Moreover, Respondent claims that the additional facts provided in his Initial Brief forcefully illustrate that the Board did not have probable cause to pursue the tenure charges against him.

### **Opinion**

The Board initially argues that the Commissioner of Education resolved any issue regarding the Charges' sufficiency in the June 11, 2020 transmittal of the matter to this Arbitrator.<sup>2</sup>

That transmittal stated in part:

[F]ollowing receipt of respondent's motion to dismiss on June 9, 2020, the above captioned tenure charges have been reviewed and deemed sufficient, if true, to warrant dismissal or reduction of salary, subject to the arbitrator's decision on the motion.

However, as Respondent points out, the transmittal specifically states that the determination regarding the Charges' sufficiency is "subject to the arbitrator's decision on the motion." That final phrase clearly specifies that final determination on the Motion is left to this Arbitrator. The transmittal letter does not resolve the Motion to Dismiss.

Arbitrators have repeatedly recognized that the New Jersey statute and code set forth the minimum requirements that must be included in tenure charges and supporting evidence, and arbitrators have repeatedly granted motions to dismiss charges that failed to meet those requirements. See, *Karp, Trongone*, and *Fetty*, cited above. See also, *Matter of the Tenure Hearing of Nikki Vogel, Sch. Dist. of the Tp. of Deptford, Gloucester Cty.*, Agency Dkt. No. 14-1/19 (May 13, 2019) (Denenberg, Tia Schneider, Arb.); *Matter of the Tenure Charges Against Dawn*

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<sup>2</sup> The letter was not from the Commissioner of Education, it was from Jennifer Killough-Herrera, Director, Office of Controversies and Disputes.

*Karpinski by Sch. Dist. City of Pleasantville, Atl. Cty.*, Agency Dkt. No. 185-8/18 (Sept. 25, 2018)  
(Colflesh, Ralph H., Jr., Arb.)

Those requirements are:

N.J.S.A. 18A:6-11 - Any charge made against any employee of a board of education under tenure during good behavior and efficiency shall be filed with the secretary of the board in writing, and a written statement of evidence under oath to support such charge shall be presented to the board.

N.J.S.A. 18A:6-17.1(b)(3) - Upon referral of the case for arbitration, the employing board of education shall provide all evidence including, but not limited to, documents, electronic evidence, statements of witnesses, and a list of witnesses with a complete summary of their testimony, to the employee or the employee's representative. The employing board of education shall be precluded from presenting any additional evidence at the hearing, except for purposes of impeachment of witnesses.

6A:3-5.1(b) In all instances of the filing and certification of tenure charges, except charges filed against a teacher, principal, assistant principal, or vice principal for reasons of inefficiency pursuant to N.J.S.A. 18A:6-17.3, the following procedures and timelines shall be observed:

1. Charges shall be stated with specificity as to the action or behavior underlying the charges and shall be filed in writing with the secretary of the district board of education or with the State district superintendent, accompanied by a supporting statement of evidence, both of which shall be executed under oath by the person(s) instituting such charges. Complete copies of all documents referenced in the statement of evidence shall be attached as part of the statement.

Those three provisions help ensure that due process is provided to an employee subject to tenure charges. The provisions require, at a minimum, that the tenure charges are (1) stated with specificity as to the action or behavior underlying the charges and are accompanied by a supporting statement of evidence, both of which shall be executed under oath by the person(s) instituting such charges, and (2) include all evidence including, but not limited to, documents, electronic evidence, statements of witnesses, and a list of witnesses with a complete summary of their testimony. The requirement placed on the necessary detail and completeness of a tenure charge submission is

emphasized by the prohibition in N.J.S.A. 18A:6-17.1(b)(3), which states “[t]he employing board of education shall be precluded from presenting any additional evidence at the hearing, except for purposes of impeachment of witnesses.”

To meet those requirements, it is incumbent on a school district to conduct a thorough investigation, provide a signed statement by the individual or individuals conducting the investigation detailing the investigation steps taken, provide signed witness statements from individuals who may be called to testify in support of the tenure charges, provide copies of all evidence in support of the charges, and provide a statement signed under oath by the person(s) instituting such charges detailing the action or behavior underlying the charges and the supporting statement of evidence.

The Board argues that the Charges against Respondent meet those procedural requirements. For the reasons set forth below, this Arbitrator concludes that the Charges do not meet those requirements.

The Charges and supporting evidence suffer from multiple shortcomings. First, the conclusion that Respondent’s behavior constituted conduct unbecoming relies in part on the negative impact Respondent’s behavior had on the students who witnessed it. However, the Charges fail to identify the person or persons who reported that Respondent’s statements and conduct were heard and observed by students and had a negative impact on those students. The Charges do not identify:

- (1) who reported that when Respondent returned to the classroom, Respondent “appeared visibly sad” in front of the students,
- (2) who reported that an unidentified student<sup>3</sup> told the paraprofessional that Respondent said he “wanted to kill himself”, and

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<sup>3</sup> The fact that the students’ identity and privacy was protected in the Charges is not fatal to the Charges. See, Karp.

(3) who reported that unidentified students went to the school Nurse “because they were deeply upset by what they heard and witnessed”?<sup>4</sup>

Because the Charges do not identify the source of those allegations, the Respondent is left to guess about who may be testifying regarding them.

Those shortcomings are exacerbated by the inadequate support provided by the evidence attached to the Charges. There are only three pieces of substantive evidence covering Respondent’s conduct on March 8, 2019. The first is the unsigned Investigation Notes. The notes do not identify who wrote them, the writer’s role in the investigation, or the source of the statements being recorded.<sup>5</sup> While the notes appear to contain one or more layers of hearsay, calling into question any evidentiary value they might arguably have, the inability to identify who took the notes or made the statements recorded in the notes are fatal flaws. Similarly, the lack of signed statements from any witnesses is also a fatal flaw. *See, Karp and Trongone.*

This leaves only MacLeod’s typed statement and the video in support of what allegedly occurred on March 8, 2019. While the video speaks for itself regarding what physically occurred in the hallway, it has no audio. MacLeod’s statement is unsigned with her name typed at the bottom. However, even if the typed notes were signed, they only corroborate a single statement that Respondent is alleged to have made to MacLeod – that he “just wanted to kill these kids”. The typed notes do not address any of the other statements Respondent is alleged to have made to her.<sup>6</sup> Taken together those three pieces of evidence fail to provide sufficient support for the

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<sup>4</sup> While the Charges can be read as implying that the Nurse reported that the students were visibly upset by what they heard and witnessed, that attribution is unclear. The Charges leave open the possibility that the Nurse, Principal Nunn or some other individual was the source and support for that allegation.

<sup>5</sup> The notes can be interpreted as being statements MacLeod and the paraprofessional gave directly to the note taker. However, it is also possible that the notes are an account by some other person to the note taker of what MacLeod and the paraprofessional told that other person.

<sup>6</sup> While MacLeod’s notes say that “some students witnessed some or all of what was happening” in the hallway, the notes do not address any of the Charges’ specific allegations regarding what students allegedly saw or heard, or how the students reacted.

allegations made in the Charges and do not meet the due process requirements set forth in N.J.S.A. 18A:6-11, N.J.S.A. 18A:6-17.1(b)(3), and 6A:3-5.1(b).

Finally, the fact that Superintendent Alexis did not have firsthand knowledge of the investigation is not in itself fatal to the Charges. However, in this case, the fact that he presented the Charges nonetheless created a procedural deficiency for two reasons. First, while the Superintendent did not necessarily need firsthand knowledge of the facts and evidence to submit the Charges, he needed to state the basis for his knowledge of the facts and evidence. The Charges are silent on that point. Superintendent Alexis' June 26, 2020 Certification cannot correct that deficiency, due to the prohibition in N.J.S.A. 18A:6-17.1(b)(3) against presenting additional evidence after the submission of the Charges. See, Fetty.

Second, even if the June 26 Certification corrected that deficiency, Superintendent Alexis, had no direct knowledge, and therefore could not properly certify the Charges without basing his certification on the certified statements of the investigator(s) and witnesses who had direct knowledge. The Charges lack certified statement from anyone, and for that reason as well, Superintendent Alexis' presentation of the Charges is procedurally defective. See, Karp and Trongone.

For all the reasons set forth above, this Arbitrator finds that the Charges filed with the Board of Education and the Commissioner of Education are procedurally deficient and must be dismissed without prejudice. Respondent must be returned to his former position.

In deciding that Respondent must be returned to his former position, this Arbitrator is aware that Respondent's alleged statements and behaviors on March 8, 2019, if true, raise potential concerns regarding Respondent's future actions. However, the Board's selected Psychiatrist

addressed those concerns in his second examination report dated September 19, 2019, stating:

As of this writing, Mr. Riley, to my knowledge has had a calm and stable time since the incident in question on March [8], 2019; has remained in treatment with Mr. Woods and Dr. Park, and told me that he intends to continue indefinitely; has arranged for those two providers to comply with my recommendations for written records and feedback about Mr. Riley's treatment; and has taken two internet courses (above) to address some of his prior problems with his teaching: He has complied with my recommendations, and in my view, used his time away from teaching to good advantage.

Putting all of these points together, (1) I reiterate a point made in my June 18, 2019 report that Mr. Christopher Riley is not likely -- for the reasons expressed in pages 11 and 12 of that report -- to repeat the March [8], 2019 episode, or one like it, in at least the reasonably foreseeable future; (2) I note that Mr. Riley has complied with my previous recommendations and continues to engage in the protective benefits of counseling/psychotherapy and psychiatric treatment....

(Statement of Evidence #14)

In reliance on the Doctor's reports, returning Respondent to his former position is the appropriate remedy in this case.

### **Award**

Respondent's Motion to Dismiss Tenure Charges is granted. The tenure charges are dismissed without prejudice. As the remedy, the School District is ordered to immediately reinstate Respondent Christopher Riley to his former position with full backpay, benefits, and all emoluments associated therewith, as required by law and consistent with the operative collective bargaining agreement.

August 7, 2020

*Robert H. Barron*

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Robert H. Barron  
Arbitrator