

American Federation of Government Employees

AFFILIATED WITH THE AFL-CIO

Local 2505

Ralph C. de Juliis
President



Carol A. Lewis
Executive Vice President

January 16, 2009

Janis Jones, Assistant District Manager
Social Security Administration
2615 Villa Prom
Oklahoma City, OK 73107

By Fax: (405) 605-3078

Dear Assistant District Manager Jones:

This constitutes the Union's response to the December 12, 2008 proposal to reduce Cxxxxxx Sxxxx in grade (i.e., demote her) from her position as a GS 9, Step 9 Claims Representative to a GS 8, Step 10, Service Representative.

In accordance with the proposal, the Union is making its response to you for your decision:

Any decision I reach must be fully considered and have the concurrence of LaVerna Williams, Social Security District Manager, Oklahoma City, Oklahoma.

An extension of time to Friday, January 16, 2009 was granted. The Union requested additional information by email dated January 8, 2009. The Union concluded that email with a request for an additional extension of time:

The Union requests an extension of time for the response to the proposal to demote so that (1) SSA can get the above requested information to the Union and (2) so that the Union can review prior to preparing its response to the proposal to demote.

c/o Social Security Administration
4750 South Garnett Road ♦ Tulsa, Oklahoma 74146-5233
CELL: (918) 781-3096 ♦ SSA FAX: (918) 641-2446
SSA E-mail: ralph.dejuliis@ssa.gov ♦ Internet E-mail: ralph.de.juliis@sbcglobal.net

SSA failed to reply to both the information request and the request for an extension of time for this response.

I. Failure of SSA to Respond to Information Requests and Request for Extension of Time for the Response to the Proposals during the Pendency of the Information Requests

The proper administrative / legal concept in which to deal with SSA's willful failure to respond to information requests is called "adverse inference" i.e. the evidence, if supplied, would have proven the assertions of the requesting party (AFGE and Ms Sxxxx) and so irreparably damages the case of the party failing and refusing to respond and supply the evidence (SSA), that a "summary judgment" is issued in favor of the requesting party.

That is the situation we have here.

Please note that SSA is very familiar with this concept. The Union refers SSA to *Huey v. SSA* and *Johnson v. SSA*. Both were non-selection EEO cases from the Kansas City Payment Center. SSA destroyed the vacancy announcement packages. EEO drew an adverse inference; EEO, therefore, found merit to the claims of non-selection based on racial discrimination, and awarded both employees retroactive promotions with back pay.

II. Other

A. The performance standards are impermissibly and illegally vague.

There are only two performance elements for Trainees such as Ms Sxxxx: (1) Engages in Learning and (2) Interpersonal Skills.

The Union observes that these are the performance standards grammar schools use for Kindergarten, 1st and 2nd graders. These standards are a parody of performance standards.

SSA has only found Ms Sxxxx deficient in the first performance standard: Engages in Learning.

B. As poorly worded as the Engages in Learning Performance Standard is, Ms Sxxxx has met the standard.

The Engages in Learning Performance Standard is found in PPM Chapter S340:

5.21.1.1. Successful Contribution (Level 3) Performance Standard

- Participates in training by asking appropriate questions, researching information and successfully completing tests and assignments.

- Processes work accurately, successfully completes on-the-job training, and seeks assistance when appropriate.
- Demonstrates progress towards independent completion of work.

SSA has never accused Ms Sxxxx of asking inappropriate questions. Therefore she meets that sub element.

SSA has accused Ms Sxxxx of failing the “participates in training” sub-element by failing to research “difficult” cases. Specifically, SSA states in the proposal:

You continued to fail at conducting research on difficult cases prior to consulting your mentor for assistance to develop your independent research skills. By not trying to solve the issues before seeking assistance you were not able to develop your skills to work more independently in your position by not properly participating in your training.

The Union does NOT concede that assertion is correct. The assertion proves she researches information. That is the performance standard. It does not say difficult or easy or moderately difficult. SSA concedes she researches. That is the standard of this sub-element. She meets it.

Another part of this sub-element is “successfully completing ... assignments”. SSA writes on Ms Sxxxx’s final appraisal:

I want to thank you for the successful contribution your [sic] have made by using your interpersonal skills. The contribution you have made to the mission of the agency through your service to customers in Oklahoma City is a true accomplishment. You continued to provide optimal customer service.

The Union reads that as proving Ms Sxxxx has successfully completed many assignments that involved providing service to OKC customers. She appears to have met and exceeded SSA’s expectation in the sub-element.

SSA has never accused Ms Sxxxx of failing to successfully complete her tests.

SSA has accused Ms Sxxxx of failing the sub element “participates in training” because she is improving in pulling her listings, but not always pulling them timely. Specifically, SSA states in the proposal:

You continue to improve in pulling your retirement Survivors Health Insurance (RSDHI) / DIB tickles, Electronic Disability Claims System (EDCS) actions and overall pending listings, but you still need improvement. ... You still fail to timely pull the listings you need to work on to keep a balanced workload. ... You continue not to focus on timely follow-ups of expired tickle dates and fail to process cases in the proper time frame.

SSA has never defined “independent completion of work.” Furthermore, the standard doesn’t require total independence, it only requires “progress towards” it.

SSA writes on 12/4/08: "Although you have learned the RSHI process, you continue to struggle on improvement of the DIB workloads..." Clearly, by SSA's own documentation, Ms Sxxxx has demonstrated progress as required by this sub element. She has achieved the standard of the sub element.

Furthermore, since SSA assigns all mentors, has Technical Experts to answer questions, permits all employees to ask each other questions, has Operations Supervisors and Management Support Specialists and RO program experts to whom questions can be directed, it is clear that no employee is ever expected to complete all assignments independently, i.e., without assistance. Indeed, some tasks require assistance, such as Critical Payments.

SSA expects all employees to need assistance at various times on various issues; that includes Ms Sxxxx. SSA has failed to define or explain what will demonstrate successful performance of the "independent" aspect of this performance standard.

After reviewing SSA's documentation and the performance standards / elements, sub-elements, and sub-sub elements, Ms Sxxxx has met the vast majority of the standards. Her performance and management's documentation thereof proves that there is no basis for taking SSA's proposed reduction in grade / demotion.

C. SSA holds Ms Sxxxx to a different performance standard than other trainees.

In her final rating discussion, SSA writes:

You produce more errors than someone with your experience should.

SSA has created a special standard for Ms Sxxxx because, unlike the other trainees, she was promoted and not an external hire.

That is unfair. That violates Article 3, Section 2.A. While Article 21 contains different appraisal periods and appeal rights for external hires and employees promoted from other positions in SSA, there is only ONE set of performance standards and performance expectations. There is no basis in the PPM or in the National Agreement for SSA to hold Ms Sxxxx to an unstated, higher performance standard than it holds other trainees.

Additionally, when her training class began in July, Oklahoma City Management said she could not attend the first weeks of training because she was already a Service Representative. OKC management had to be ordered to send her to the first two weeks of training.

When the other trainees were offered advanced training, Ms Sxxxx was denied the opportunity.

SSA has violated Article 3, Section 2.A and Article 16, Sections 1, 2, 3 and 8.

As further evidence that SSA is holding Ms Sxxxx to disparate, harsher and illegal performance standards, the Union cites the final performance discussion between Ms Sxxxx and OKC ADM Janis Jones.

In the morning of December 12, Ms Jones called Ms Sxxxx into the office to discuss a chart Ms Jones made of Ms Sxxxx's claims. The list contained 8 claims. 3 were found to have no error; 5 were found with errors. Ms Sxxxx explained the alleged error on xxx-xx-8737 "DD incorrect". Ms Jones agreed that explanation proved there was no DD error. Ms Jones then told Ms Sxxxx that a 50% error was still unacceptable.

It is illegal to state a few hours before the proposed demotion for the very first time that a certain error percentage is not acceptable without having told the employee at the outset what the acceptable error percentage was. Would 49% have been acceptable? How about 49.5%?

Is that percentage statistically valid? What is the sample size? What is the size of the universe of interviews, claims and other actions? Does leaving mail unopened until the next business day count as an error? Are all errors equal?

SSA has made a conscious decision to destroy Ms Sxxxx's self esteem and worsen her financial status. The Union thinks it has an affirmative burden to explain those things IN ADVANCE so Ms Sxxxx is provided a real opportunity to demonstrate successful performance. She has no chance if she isn't told what the minimum successful performance standards are.

SSA's use of numerics violates the email to the Union from Dana Callahan regarding use of numerics in individual employee performance appraisal as well as Article 21, Section 6.G which requires:

G. Considerations In Assessing Performance

...

2. When numerical goals, guidelines, indicators and pars are factors in appraising an employee in a given critical element, management will consider the employee's other job assignments and the actual amount of time available to perform the job function being appraised under that critical element.

...

4. In the performance of and accounting for Agency work, statistical measures and their application will be reliable.

D. SSA has violated Article 21 of the National Agreement.

1. The Performance Assistance Plan is deficient.

In *Wilson v. SSA*, the court found that SSA's performance standards were backwards and illegal. The PA similarly is backwards and illegal.

Article 21, Section 7.A.1 states that "The manager should discuss with the employee: 1. the expectations for improving performance."

The PA states:

You are not completing or processing RSI and/or DIB claims workload in an accurate and timely manner.

Union comment: Accurate and timely are not defined or explained. The performance expectation has NOT been communicated.

By this time in your training, you should be able to conduct high-quality interviews to effectively determine entitlements for the beneficiary, handle actions to completion whenever possible and provide customer refers when appropriate for applications for DIB entitlement, spouse/children auxiliary or survivor benefits.

Union comment: No definition or explanation is given of "high-quality interviews". SSA only requires Ms Sxxxx to "handle actions to completion whenever possible". So SSA has made a standard that Ms Sxxxx can't know in advance because, like the US Supreme Court said about pornography, "I'll know it when I see it." "Whenever possible" is an *ex poste facto*, backward standard. SSA can't define it up front for Ms Sxxxx but knows it after the fact when she fails. Hum...ILLEGAL!!

When you complete disability claims you are not careful to document them properly.

Union comment: what is to be documented, where, how? An expectation that she be careful is not a valid performance standard.

You have not demonstrated the ability to retain material and apply policy and training material when appropriate. You are not fully analyzing issues and utilizing procedures that result in timely service.

Union comment: When may Ms Sxxxx appropriately NOT retain material, apply policy and training material since the performance expectation is that she only do it "when appropriate"?

Analyzing issues and utilizing procedures are to be judged by timely service? Okay. So, where are the performance expectations about "timely service"? How is that defined or explained for each kind of workload?

You do not prioritize and organized [sic] your workload. You will need to improve your desk management skills and organization of your cases to promote timely completion of your interviews and case workload.

Union comment: As above, there is no explanation of how prioritization and organization of the workload looks. It appears that prioritization, organization, sufficient or adequate desk management skills will PROMOTE timely completion of her interviews and case workload. So, adequate and sufficient desk management skills, prioritization and organization does NOT actually result in timely completion of interviews and case workload, but ONLY PROMOTES (i.e., encourages) timely completion. What kind of performance standard and expectation is that?! Certainly none over which SSA can support a performance based demotion of Ms Sxxxx!!

You are not taking responsibility for your training...It is critical that customer and/or mentor inquiries are done in a timely manner. Timely follow-up on MCS/MSSICS tickles or feedback to mentor via ePAD are not completed on a route basis. [sic]

Union comment: The problem is CRITICAL customer and/or mentor inquiries being timely. The issue is NOT non-critical customer and/or mentor inquiries. There is no explanation which are critical and non-critical.

“Route basis” we assume means “routine basis.” What does “routine” mean? Daily? Weekly? On “non interviewing days”? There is no explanation.

The Union is confused as is Ms Sxxxx about “timely follow-ups...on a route basis”. Can there be timely follow-ups on a NON-routine basis?

The 2005 contract eliminated mandatory Union involvement in the preparation of the PA and the OPS, which would have caught such things at the outset. Having caught them at this point, the PA and OPS can't be corrected and fixed. They form the basis of the performance based proposal. They are defective and the proposal unsustainable.

2. The Opportunity to Perform Successfully (OPS) is deficient.

Article 21, Section 7.B states that the OPS must include written notice that includes: “(2) the performance requirement(s) or standard(s) that must be attained in order to demonstrate acceptable performance.”

The OPS quotes the PA. As in the previous section, the standards are backwards, undefined and not explained. We know what Ms Sxxxx is allegedly doing wrong; but we don't know what she needs to do in order to demonstrate performance at the successful level other than not to do those things cited in the **Elements Needing Improvement**.

The list contained in **How to Improve Performance** also is vague and non specific. No one reading it knows what Ms Sxxxx has to demonstrate to prove successful performance. For instance, “Prioritize workloads to meet customer and agency expectation and office goals.” What are the customer and agency

expectations? What are the office goals? Since when did office goals become a performance standard to which individual employees were held accountable?

Article 21, Section 5.D. reads in its entirety: "If the Agency decides to use numerics as performance standards, it will clearly be identified as such." SSA clearly stated in an email to me:

From: Callahan, Dana B.
Sent: Friday, April 11, 2008 5:49 PM
To: Dejuliis, Ralph
Cc: Neal, Sandra; Purifoy, Dennis; Williams, La Verna; Ybarra, Saulo; Jones, Janis; Dotson, Lottie
Subject: SDW Cadre

Hi, Ralph,

Thank you for your inquiry regarding the performance expectations for the SDW cadre. I am responding on behalf of management.

The Region has an SDW case goal. However, cadre members do not have numeric goals at the individual level. Since the individual employees do not have numeric goals, they do not have to meet specific targets. The employees were provided Performance Expectations at the beginning of the Fiscal Year which are still in effect and do not contain any numeric goals. Numerics will not be used to rate individual performance. Management will ensure that this is clarified with the SDW cadre members.

If you have any questions or concerns, please feel free to contact me.

Thank you.

Dana B. Callahan
Project Manager/LR/ER
Dallas Region
214-767-0290
fax - 214-767-0639

The Union highlights:

individual employees do not have numeric goals, they do not have to meet specific targets. The employees were provided Performance Expectations at the beginning of the Fiscal Year which are still in effect and do not contain any numeric goals. Numerics will not be used to rate individual performance.

Therefore, the OPS is illegal and violates SSA's own policy for requiring Ms Sxxxx to meet "office goals".

Another way SSA told Ms Sxxxx to improve is "Do not set aside unopened mail or items you cannot get to, as this is a disservice to customers." It appears from this statement that SSA understands that Ms Sxxxx does not have enough time in the day to get to every piece of mail or item because she is doing other things, like interviewing, pulling lists, doing follow ups, meeting with her mentor, etc. SSA acknowledges there are things "you cannot get to" BUT SSA tells her to do them

and not set them aside “as this is a disservice to customers.” How is she supposed to do that?!

SSA gives her conflicting instructions: “Requests that require consultation and research should be addressed with the mentor the same day or the next business day.” The next instruction is “Requests that require research should not be held or backlogged.” BUT, SSA immediately before this second instruction told Ms Sxxxx it could be held until the next business day which could be several days later with holidays, leave and the weekend.

SSA gives instructions for improvement that are meaningless:

Handle each document the fewest number of times necessary to effectuate and accurate and timely decision to avoid duplication of work.”

How many times may she handle each document? At what point does she cross the line and “handling” the document does not “effectuate and [sic] accurate and timely decision” that causes duplication of work? Suppose Ms Sxxxx handled a document too many times but it did not result in a duplication of work? Duplication of work is doing the same thing more than once? Is that correct? Did SSA mean a subsequent contact with the number holder or claimant because another question had to be answered or an additional claim be taken?

Again, if SSA hadn’t told Ms Sxxxx that she was NOT entitled to a Union rep, I would have been there, filed a grievance over the OPS and pointed out those things before now. Since this is now and not then and SSA has proposed a performance based action based on this OPS, which is totally deficient, SSA’s proposed performance based action is unsustainable.

The OPS, on the bottom of page 4 reads: “The following examples support the determination that your performance is not at the successful level for the element: **Engages in Learning.**” (Bolding in original)

NOTHING follows. The next page begins: **How to Improve Performance.**

SSA has no examples. It is not Ms Sxxxx’s performance that fails to demonstrate successful performance; it is this shameful OPS and SSA proposing to demote her!

E. Ms Sxxxx was disadvantaged by too many supervisors and too many mentors.

1. Supervisors

Her first supervisor was Heath Tebow. He was in the Leadership Development Program. He was new, inexperienced, and a short-term employee with a short

term outlook. As all LDP employees in short-term assignments, he had no vested interest in Ms Sxxxx's success. All he needed was to make sure he wasn't responsible for any failures or he would never get a permanent GS-12. He was going through the motions and biding his time. He was promoted. Ms Sxxxx's next supervisor was Nikole Anderson. She was newly promoted. She has subsequently been promoted to District Manager. Again, she had no vested interest in Ms Sxxxx's success. All she needed was to make sure she wasn't responsible for any failures or she would never get a promotion. What both Mr. Tebow and Ms. Anderson had to do to prove that they were worthy of being permanently in management and being promoted was show that they could do a hatchet job on a helpless employee no one liked and about whom the mentors complained. That is what they did. They got their promotions. Ms Sxxxx should not be the road kill on the fast-track of their success!

There is only an initial PACS discussion from Mr. Tebow and a final PACS discussion from Ms Anderson. That violates Article 21, Section 5.F states:

Subsequent expectation sessions should be held when there is a change in the work situation such as:

1. a change in the supervisor of record,
- ...
3. a change in component goals or objectives, or

SSA failed to hold a subsequent PACS discussion when Ms Anderson became Ms Sxxxx's supervisor. SSA failed to hold subsequent PACS discussions when SSA's goals were suspended / reinstated, etc.

2. Mentors

Ms Sxxxx's first mentor did not like Ms Sxxxx and told co-workers even while she was in training that she was not going to succeed. Ms Sxxxx's first mentor was verbally abusive to Ms Sxxxx in front of co-workers. When Ms Sxxxx went to management about the situation, she was told that she had better learn to get along with her first mentor because the office didn't have anyone else to assign to be her mentor.

When Ms Sxxxx finally got a new mentor, the next mentor was poisoned by the "low down" she received from Ms Sxxxx's first mentor. That mentor had been a Title 2 CR for less than two years. Just like the first mentor, the second one was promoted and had to be replaced with another mentor. Ms Sxxxx was never given a fair chance to succeed.

SSA has violated Article 3, Section 2A and Article 16, Section 8.

As in *SSA and AFGE*, Case No FL-2003-R-0001, Arb. Goldstein (May 26, 2004):

...the record shows that the Grievant's mentor in DeLand was not helpful and did not spend the necessary time with the Grievant ... This one failure in the Grievant's training, without more, is enough to render the training unfair.

Arbitrator Goldstein reinstated the Grievant to her position prior to the demotion. The Union is of the opinion that we shouldn't go that far. SSA should find that it has failed to meet its burden of proof to support a performance based demotion of Ms Sxxxx.

F. Discrimination / Hostile Work Environment

Ms Sxxxx is African-American. Her mentors and supervisors were not. The Union believes that but for her race, she would not have been subject to public verbal abuse by her mentor which was tolerated by her supervisors, as noted above. Additionally, management has admitted it is holding her to higher performance expectations than the other trainees, also noted above. Management has denied her training, as noted above. There is no basis for such disparate treatment other than her race.

SSA has created special CR assignments for white males. Specifically, the Union refers to the assignments of James M. Johnson and Ralph C. de Juliis in the Tulsa, OK SSA District Office. Both are GS-11 Claims Representatives. Ms Sxxxx could perform their SSA assigned duties. The Union believes SSA would do so but for the fact that Ms Sxxxx is female and African-American.

It also seems a strange co-incidence to the Union that Mr. Stephen Gaines, who left SSA in OKC, now wishes to be rehired. Since SSA is under a hiring freeze, it would seem that OKC will have to get rid of someone in order to hire Mr. Gaines. Ms Sxxxx's CR job, it appears, since she is a female is being sacrificed for a male, Mr. Gaines.

G. Reprisal and retaliation because of Ms Sxxxx's exercise of protected rights

When Ms Sxxxx met with her supervisor, Nikole Anderson on November 13, Ms Sxxxx asked if she should get a Union Representative. Ms Sxxxx said that she wanted one if she was in danger of losing her job. OS Anderson said she didn't feel Union representation was warranted.

Ms Sxxxx was told that the OKC DM was going to have to decide whether to demote her or leave her as a limited duty CR.

Ms Sxxxx appointed Ralph de Juliis, President, AFGE Local 2505 as her representative on December 2. On December 3, Ralph de Juliis contacted OS Anderson and asked for information. On December 4, DM Williams replied:

Ralph --

I appreciate your concern but, at this time, we have not proposed any action in accordance with Article 21. Therefore, I am not forwarding the information you requested. If you still wish to receive this information, Cxxxxxx Sxxxx should be able to provide it.

LaVerna Williams, DM

On Friday morning, December 12, 2008, Cxxxxxx met with ADM Jones and discussed her appraisal rating and what was going to happen to her. She was told that decision would be up to DM LaVerna Williams who would make the decision when she returned to the office on Monday, December 15.

On Friday afternoon, ADM Jones handed Ms Sxxxx the proposal to demote her.

There is a clear nexus between Ms Sxxxx exercise of her right to seek Union representation and the hastily made decision to demote her rather than consult with DM Williams when she returned to the office.

The message SSA wishes to send to all employees is clear: If you seek Union representation, bad things will happen to you and happen FAST. We won't need to wait or consult."

That message has a "chilling effect" on Ms Sxxxx's exercise of an employee's protected right to have Union representation, in violation of Article 1, Section 1; Article 2 A and B; Article 3, Sections 1, 2, 6, and 10. It has a chilling effect on all employees.

"Chilling effect" is retaliation and is reprisal discrimination. See *Burlington Northern and Santa Fe Railway Co. v. White*, 548 U.S. _____, 126 S.Ct. 2405 (2006) (which in the retaliation context means that the action might have deterred a reasonable person from opposing discrimination or participating in the EEOC charge process); see also *Lindsey v. United States Postal Service*, EEOC Request No. 05980410 (Nov. 4, 1999) (citing EEOC Compliance Manual, No. 915.003 (May 20, 1998)). Instead, the statutory retaliation clauses prohibit any adverse treatment that is based upon a retaliatory motive and is reasonably likely to deter the charging party or others from engaging in protected activity. ... the type of activity that is reasonably likely to deter complainant or others from engaging in protected activity.

H. SSA is using ePAD

As noted above, SSA cited Ms Sxxxx for failing to "Timely follow-up on MCS/MSSICS tickles or feedback to mentor via ePAD." The Union demanded bargaining over expansion of ePAD. When SSA refused, the Union filed a national grievance UMG 0-8-02 dated 11/19/2008. SSA may not use ePAD against employees as they are doing to Ms Sxxxx until completion of bargaining.

I. The Errors Cited in the proposal to demote do NOT support SSA's proposal.

For example, SSA's first case on page 2: xxx-xx-9999. There is nothing wrong with taking a deferred app for denial instead of an ABAP. Sometimes an employee doesn't know until into the claim that the applicant isn't eligible. Once the interview has begun as a deferred application, it is more time consuming to manually clear that one and re-load an ABAP. Taking the additional time to manually clear and re-load would NOT "have streamlined the application process, thus provide more efficient service to the public" as claimed in the proposal to demote.

The other examples SSA provides in the proposal are just as suspect in probative value.

J. OTHER

In Ms Sxxxx's final appraisal, SSA writes: "The areas that you need improvement on are: Finding new ways to enlighten customers of SSA online services and direct deposit."

WHERE did THAT come from? NOTHING in any of the documentation provided to the Union mentions Ms Sxxxx was expected to find "new ways to enlighten customers of SSA online services and direct deposit."

If SSA wanted to give her an honest chance to succeed, it should not have been adding in such things.

III. Conclusion

Accordingly, the Union requests that SSA determines that (1) SSA has not met its burden of proof and there is insufficient evidence to support its proposed demotion of Cxxxxxx Sxxxx for unacceptable performance; (2) the proposed demotion should be withdrawn with prejudice; (3) Ms Sxxxx's records should be expunged of all information related to the PA, OPS and proposed demotion. (4) All WIGIs and career ladder promotions to which Ms Sxxxx would have been entitled will be retroactively granted. (5) Ms Sxxxx will be paid for all the overtime she could have worked but was barred from working because she was improperly considered "not in good standing." (6) Ms Sxxxx will be credited with credit hours she could have worked had SSA not improperly considered her "not in good standing." (7) Since SSA and the mentors it assigned to Ms Sxxxx prejudged her even while she was in training and since SSA isn't really happy with her performance, SSA send Ms Sxxxx back to CRT training and that she be assigned a supervisor and mentor who are committed to her succeeding and

who will not use Ms Sxxxx's failure as a stepping stone to a promotion for themselves.

On behalf of Ms Sxxxx and AFGE

Sincerely,

Ralph C. de Juliis, President
AFGE Local 2505

Cc: Cxxxxxx Sxxxx
Local 2505 Executive Board
Patricia McGowan, Esquire