

BEFORE THE  
COMMISSION ON PROFESSIONAL COMPETENCE  
SAN DIEGO UNIFIED SCHOOL DISTRICT  
STATE OF CALIFORNIA

In the Matter of the Dismissal of:  
  
RITA BRADSHAW-McKERRING,  
  
Respondent.

OAH No. 2016060112

DECISION

This matter came on regularly for hearing before the Commission on Professional Competence in San Diego, California on November 14, 15, 16, and 17, 2016. The Commission was comprised of the following members: Administrative Law Judge Mary Agnes Matyszewski, Tamatha Parker and Ursula Sack, Ph.D.

Kari D. Sullivan, Esq., represented the San Diego Unified School District.

Jon Cadieux, Esq., of Smith, Steiner, Vanderpool and Wax, APC, represented respondent Catherine Bradshaw-McKerring, who was present throughout the hearing.

On December 9, 2016, ALJ Matyszewski conducted a telephonic conference with the parties' attorneys during which they provided a confidential names list, a request of what records to seal and/or redact, and a lawsuit descriptions list identifying the three lawsuits at issue in this litigation. The confidential names list was marked and received as Exhibit C and was sealed. The request identifying records to be sealed or redacted was marked and received as Exhibit D and was sealed. The lawsuit descriptions list was marked and received in evidence as Exhibit E and was sealed.

On December 12, 2016, the Commission met to deliberate and the matter was submitted.

CASE SUMMARY

Ms. Bradshaw-McKerring was employed as a school psychologist at an elementary school in the district. After being employed at that school for a few years, when incidents occurred on campus, including sexual assaults, sexual harassment and failure to implement IEPs, she began disseminating confidential and privileged information to individuals not

entitled to that information. Her dissemination of that information constituted persistent violations of applicable district policies. Ms. Bradshaw-McKerring also filed a false residency declaration with the district asserting that her children lived within school boundaries when they did not. Filing that false document constituted dishonesty. Based upon the evidence presented both in support of, and in defense to, the charges filed against Ms. Bradshaw-McKerring, the Commission concluded that the allegations that were sustained warranted her dismissal from the district.

## PROTECTIVE ORDER AND REDACTION

The information contained in the records in this matter is subject to a protective order. Exhibits 8, 27, 32, 35, 46, 69, 79, C, D, and E, inclusive, were admitted into evidence and contain confidential information, as does the Exhibit/Witness List. It is impractical to redact the information from these exhibits and that list. To protect privacy and the confidential personal information from inappropriate disclosure, Exhibits 8, 27, 32, 35, 46, 69, 79, C, D, and E, inclusive, and the Exhibit/Witness List are ordered sealed. This sealing order governs the release of documents to the public. A reviewing court, parties to this matter, their attorneys, and a government agency decision maker or designee under Government Code section 11517, may review the documents subject to this order, provided that such documents are protected from release to the public. No court reporter or transcription service shall transcribe the information contained in the records or transcribe the names of the children or their parents.

Confidential and identifying information from other exhibits was redacted post-hearing to protect the privacy of witnesses and children.

## FACTUAL FINDINGS

### *Commission Concerns*

1. Although not an issue to be decided in this proceeding, the Commission was very concerned about the evidence that was introduced regarding allegations of multiple sexual assaults occurring at Green Elementary School, the lack of principal leadership while all of these events were taking place, and the almost complete disregard by the district for what was occurring on this campus. The Commission was struck by the district's lack of action and how it stood idly by while these numerous sexual assaults, instances of sexual harassment, and what appeared to be utter chaos were happening, especially given that the victims and perpetrators of this widespread sexual abuse were elementary school age children. The Commission was very disturbed by the evidence of sexual assaults introduced in this hearing and the district's failure to intervene.

### *Jurisdictional Matters*

2. Ms. Bradshaw-McKerring was employed by the San Diego Unified School District as a school psychologist. At all relevant times Ms. Bradshaw-McKerring was the

school psychologist at Green Elementary School. She worked on that campus two days per week, the other three days she worked at Trace, an alternative school in the district.

3. On July 1, 2015, Ms. Bradshaw-McKerring was placed on paid administrative leave pending the outcome of an investigation of her actions.

4. On April 27, 2016, Tim Asfazadour, the district's Chief Human Resources Officer, signed the Notice of Intent to Dismiss and the Dismissal Charges in his official capacity. The notice and dismissal sought to immediately dismiss Ms. Bradshaw-McKerring from employment with the district on the grounds of unprofessional conduct, dishonesty and persistent violation or refusal to obey school and/or district rules. (The charges pertaining to the last cause incorrectly cited to former Education Code section 44932, subdivision (a)(7), the correct code section is Section 44932, subdivision (a)(8).)

Moreover, although the pleading asserted that Ms. Bradshaw-McKerring was dishonest and demonstrated unprofessional conduct (paragraph 2, page 1), identified the alleged acts that constituted unprofessional conduct (paragraph 3, subsections a through j, pages 1 through 4) and listed the act that constituted dishonesty (paragraph 4, page 4), nowhere in the pleading did the district identify the specific acts that constituted persistent violations of its rules and regulations. That violation was charged in the introductory paragraph (page 1, lines 15-17), but the pleading did not specify what acts violated the district's policies. As such, the Commission reviewed each act alleged in conjunction with the policies introduced at hearing (Administrative Procedures 6527, 7039, 7045) to determine if those acts met Education Code section 44932, subdivision (a)(8), criteria.

5. Ms. Bradshaw-McKerring timely appealed the dismissal action, denying that grounds for her dismissal from employment existed, and this hearing followed.

#### *Motions in Limine<sup>1</sup>*

6. Ms. Bradshaw-McKerring's motion in limine to exclude evidence, argument, or allegations related to the charge of unprofessional conduct, per Education Code section 44938, was granted in part and denied in part. Complainant failed to comply with the 45-day requirement as mandated by Education Code section 44938. As such, it was not allowed to proceed against Ms. Bradshaw-McKerring on the charge of unprofessional conduct. Ms. Bradshaw-McKerring's request to exclude the documents referenced in her motion in limine was denied as those documents pertained to other charges filed against her.

Even though the district could not proceed on its charge of unprofessional conduct in this hearing, the Commission was troubled that Ms. Bradshaw-McKerring never received an unfavorable evaluation or performance review, nor was she ever placed on an assistance plan. Instead, she was placed on leave pending the district's investigation of the issues

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<sup>1</sup> The motions in limine, oppositions thereto and this court's Order were received in evidence as Exhibit A.

alleged in the pleadings. Ms. Bradshaw-McKerring was never given any guidance, directives, an opportunity to improve, or a chance to demonstrate a change in her behavior. As with the concerns noted in Finding 1, the Commission was bothered by this fact, as well.

7. Ms. Bradshaw-McKerring's motion in limine to exclude evidence and allegations pre-dating the charges by four years was granted in part and denied in part. No evidence of incidents occurring before April 27, 2012, was allowed to be introduced, including the 2010 enrollment form and her 2004/2009 performance evaluation, as well as any other records beyond the four year limitation period. The parties were permitted to introduce the district's "regularly kept records" but no decision was based on any evidence occurring before April 27, 2012. Alternatively, the parties were permitted to introduce older evidence to impeach any witness or if they could demonstrate that equitable principles applied. No such evidence was introduced at hearing.

*Evaluation of Ms. Bradshaw-McKerring's Alleged Persistent Violations of District Policies*

8. Ms. Bradshaw-McKerring shared privileged and/or confidential student information with Parent 3, including informing Parent 3 about incidents on campus involving students other than Parent 3's child, identifying students involved in incidents who were not Parent 3's child, informing Parent 3 about information contained in internal district documents, providing Parent 3 teacher assignments, and identifying and/or providing identifying information about other parents seeking services and/or students receiving services who were not Parent 3's child. (Exhibit 32 pages 49-51, 55-59, 64, 74-75, 78, 80-85; Exhibit 41 pages 91-92; and testimony of Parent 3.)

Ms. Bradshaw-McKerring's disclosures and communications to Parent 3 violated district Administrative Procedure numbers 6527, 7039 and 7045. Her repeated disclosures and communications demonstrated a persistent violation of those policies.

9. Ms. Bradshaw-McKerring shared privileged and/or confidential student information with Parent 2, including informing Parent 2 about incidents on campus involving students who were not Parent 2's child, providing identifying information about students who were not Parent 2's child, informing Parent 2 that the principal was on leave due to investigations occurring on campus, disclosing information about investigations on campus, advising Parent 2 about litigation and settlements involving students at the school who were not Parent 2's child, and providing Parent 2 with information involving other parents. (Exhibit 27 page 96; Exhibit 46 pages 25, 96, 99 and 101; Exhibit 79 page 166; and testimony of Parent 2.)

Ms. Bradshaw-McKerring's disclosures and communications to Parent 2 violated district Administrative Procedure numbers 6527, 7039 and 7045. Her repeated disclosures and communications demonstrated a persistent violation of those policies.

10. Complainant did not establish by a preponderance of the evidence that Ms. Bradshaw-McKerring shared privileged and/or confidential student information with Noon



Duty Assistant Nikki Dodd about students with IEPs. The only evidence of that charge was provided by Cesia Guizar, the Green Elementary School Assistant, who gave a statement and testified. Ms. Dodd did not testify nor was she interviewed during the investigation. Ms. Guizar's claim that Ms. Bradshaw-McKerring provided information to Ms. Dodd about IEPs was hearsay and not supported by any non-hearsay evidence.

11. Ms. Bradshaw-McKerring shared privileged and/or confidential student information by forwarding e-mails to a parent and two unknown individuals about students who were not their children. (Exhibit 9 page 138; Exhibit 10 page 140; and Exhibit 13 page 144.) Ms. Bradshaw-McKerring's disclosures and communications to that parent and the two unknown individuals violated district Administrative Procedure numbers 6527, 7039 and 7045.

12. Complainant did not establish by a preponderance of the evidence that Ms. Bradshaw-McKerring's sharing of privileged and/or confidential student information by forwarding e-mails to staff violated district Administrative Procedure numbers 6527, 7039 or 7045. (Exhibit 11 page 142; Exhibit 21 page 259; Exhibit 22 page 261; Exhibit 16 page 151; and Exhibit 17 page 155.) Moreover, although alleged, no evidence was introduced indicating that Ms. Bradshaw-McKerring disclosed confidential or privileged information to Jack Robertson, district education specialist.

13. Complainant did not establish by a preponderance of the evidence that Ms. Bradshaw-McKerring failed to adequately complete Individualized Education Program (IEPs) psychological reports in a timely manner. Although evidence in support of that allegation was introduced (Exhibit 79; Exhibit 82, page 1; and testimony of Scott Lemler), the evidence in rebuttal refuted that contention (Exhibit 81 and testimony of Melinda Dayharsh and Ms. Bradshaw-McKerring). Moreover, the evidence offered by complainant regarding this allegation was too generalized and nonspecific to support a finding. Furthermore, even if this cause had been established, a preponderance of the evidence did not demonstrate that this act violated any of the district policies introduced in this proceeding.

14. Complainant did not establish by a preponderance of the evidence that Ms. Bradshaw-McKerring disrupted student instructional time. Moreover, even if this cause had been established, a preponderance of the evidence did not demonstrate that this act violated any of the district policies introduced in this proceeding.

15. Complainant did not establish by a preponderance of the evidence that Ms. Bradshaw-McKerring was unprofessional and disruptive when conducting GATE testing. Moreover, even if this cause had been established, a preponderance of the evidence did not demonstrate that this act violated any of the district policies introduced in this proceeding.

16. Ms. Bradshaw-McKerring disclosed GATE scores via e-mail before the scores were released by the school (Exhibit 12). Although Ms. Bradshaw-McKerring's actions in doing so demonstrated a lack of good judgment, a preponderance of the evidence did not establish that her actions violated any of the district policies introduced in this proceeding.

### *Evaluation of Ms. Bradshaw-McKerring's Alleged Dishonesty*

17. Ms. Bradshaw-McKerring submitted a false "Declaration of Residency" form (Exhibit 7). Ms. Bradshaw-McKerring signed the form under penalty of perjury stating that her children lived at an address within Green Elementary School's boundaries when, in fact, they did not. Ms. Bradshaw-McKerring's offered various explanations for signing the document: that it was provided to her by the office staff, that she did not read the form, and that she was coming through the office with her hands full when she was stopped and asked to complete the form. Ms. Bradshaw-McKerring also testified that it was her understanding that this was the correct form to complete and that she relied on the office staff to give her the proper form. In other testimony, she asserted that, on one occasion, her children had attended daycare at that residence, but the owner of that home denied that the children resided there.<sup>2</sup> While it was unclear from the evidence presented if the children had ever attended daycare at that residence, it was clear that neither Ms. Bradshaw-McKerring nor her children resided at that address.

None of the explanations Ms. Bradshaw-McKerring put forth was persuasive or credible, and demonstrated Ms. Bradshaw-McKerring's inability to own up to her actions. The district's residency form only contained two sentences, one stating that the signer declared that their children lived at the address provided, and the other stating that the form was being signed under penalty of perjury. The bottom of the form cautioned that the signer would be "committing a crime punishable under the laws of the state of California" if the statements provided on the form were incorrect. Thus, there was no excuse why Ms. Bradshaw-McKerring failed to appreciate the significance of signing a false document.

### *Ms. Bradshaw-McKerring's Testimony*

18. Ms. Bradshaw-McKerring testified about all of the sexual assaults, sexual harassment, and other incidents occurring on campus. She explained that despite the concerns she raised on campus, nothing was being done to end those incidents. Out of concern, she was sharing information with parents, but claimed it was information that was already publicly available, was disclosed by her after individuals already knew about it, or was important information she thought they should know. As to the residency declaration, she acknowledged not reading the document, but blamed the district for not providing her with the correct form.

Ms. Bradshaw-McKerring's testimony demonstrated a complete lack of ownership by her for her actions. Moreover, contrary to her testimony, her many texts demonstrated that she was gossiping with parents, not professionally communicating information. Further, her communications indicated that she had blurred the line between the professional duties she owed as the school psychologist at Green Elementary School and conversations in which she

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<sup>2</sup> The owner's statements to the principal were received as administrative hearsay. Those statements supplemented and explained Ms. Bradshaw-McKerring's testimony that she did not reside at that address.

could engage as a parent of students attending the school. Despite Ms. Bradshaw-McKerring's contention that she was disclosing this information for the greater good, the colloquial tone of her texts and emails refuted that assertion because they portrayed a woman who was gossiping about confidential and privileged information with parents who were not entitled to that information. For example, in her communications to Parent 3 Ms. Bradshaw-McKerring texted: "Hell hath No fury like a Momma scorned!" "Here COMES the PAIN! Game On! This mom is coming for you with a vengeance next year. Get in ur little jabs when you can cause it's gonna be a knockout in the END!" (Exhibit 46 page 52.) Ms. Bradshaw-McKerring also criticized her administrator/teacher on campus in texts to Parent 3. (Exhibit 46 pages 55-59.) Moreover, the evidence established that her actions of repeatedly sharing information only stirred up more acrimony and discord on the campus.

Additionally, the Commission was struck by the fact that although Ms. Bradshaw-McKerring sought medical treatment due to the stress she was experiencing on campus, that on April 28, 2015, her physician signed documentation stating that she was "not to work at Green Elementary School at all," and that the district's Human Resources Department approved her request to be away from that school, Ms. Bradshaw-McKerring continued her actions. Despite being out on medical leave, she accessed privileged and confidential district information regarding Green Elementary School students and disseminated that information to Parent 3. That dissemination resulted in Parent 3 becoming very upset and instructing Ms. Bradshaw-McKerring to stop contacting her. It was troubling that Ms. Bradshaw-McKerring continued her persistent violation of district policies even while on medical leave.

Finally, despite Ms. Bradshaw-McKerring's testimony about her concerns, she failed to offer an adequate explanation for her failure to notify the proper channels of those concerns and or follow her chain of command. Her testimony about the lack of principal leadership on campus was supported by the evidence and was concerning to the Commission. She also testified that she thought the residency issue and the school dis-enrolling her two children mid-year was retaliatory for her informing people about what was taking place on the campus. Ms. Bradshaw-McKerring further asserted that she believed that the instructions she was getting about being late, having to specially sign in on campus, and her issues regarding her reports were also retribution for the concerns she was voicing about the campus. However, these explanations were insufficient to warrant her actions.

Ms. Bradshaw-McKerring's supervisor was not the Green Elementary School principal; her supervisor was at Trace, the district's alternative school where she worked three days per week. Why Ms. Bradshaw-McKerring did not properly notify that supervisor was never adequately explained. Instead, the evidence demonstrated that Ms. Bradshaw-McKerring improperly and repeatedly disseminated confidential and privileged information to individuals who were not entitled to it. The dissemination of that confidential and privileged information to those individuals, the length of time she disseminated it, and the numerous times that she disseminated information, demonstrated that she persistently violated, or refused to obey, the three district policies introduced at hearing.

## LEGAL CONCLUSIONS

### *Applicable Code Sections*

1. A permanent employee may be dismissed for cause only after a dismissal hearing. (Ed. Code, §§ 44934, and 44944.)
2. Education Code section 44932 provides the grounds for dismissing a permanent employee. Subdivision (4) authorizes dismissal for dishonesty. Subdivision (8)<sup>3</sup> authorizes dismissal for the persistent violation of or refusal to obey the school laws or reasonable regulations.
3. Education Code section 44944 establishes the right to a hearing, the process for selecting the three-member Commission on Professional Competence, and sets forth the Commissions' authority regarding its final decision.
4. Education Code section 44938 outlines the procedures the governing board must follow before acting on any charges brought against a permanent employee.

### *Burden and Standard of Proof*

5. The "burden of proof" means the obligation of a party, to convince the trier of fact that the existence of a fact sought to be proved is more probable than its nonexistence. (*Redevelopment Agency v. Norm's Slauson* (1985) 173 Cal.App.3d 1121, 1128.)
6. The standard of proof in a teacher dismissal proceeding is a preponderance of the evidence. (*Gardner v. Commission on Professional Competence* (1985) 164 Cal.App.3d 1035, 1039-1040.) A preponderance of the evidence means that the evidence on one side of an issue outweighs, preponderates over, and is more than, the evidence on the other side of the issue, not necessarily in number of witnesses or quantity, but in the convincing effect the evidence has on those to whom it is addressed. In other words, the term refers to evidence that has more convincing force than that opposed to it. (*People ex rel. Brown v. Tri-Union Seafoods, LLC* (2009) 171 Cal.App.4th 1549, 1567.)

### *Morrison Factors*

7. The seminal case for teacher dismissals is *Morrison v. State Board of Education* (1969) 1 Cal.3d 214. There the Supreme Court suggested seven factors that a school board may consider when considering discipline: (1) the likelihood that the conduct adversely affected students or fellow teachers and the degree of such adversity; (2) the proximity or remoteness in time of the conduct; (3) the type of teaching certificate held by the teacher; (4) the existence of extenuating or aggravating circumstances and publicity, if

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<sup>3</sup> The district's Dismissal Charges incorrectly cited to Subdivision (a)(7), the former number of this Education Code section. This subdivision was renumbered by A.B. 215.



any, surrounding the conduct; (5) the praiseworthiness or blameworthiness of the motives resulting in the conduct; (6) the likelihood of recurrence of the questioned conduct; and (7) the extent that the discipline may adversely impact or have a chilling effect on the constitutional rights of the teacher.

8. The *Morrison* factors can be applied to all the charges in the aggregate. When a camel's back is broken, the trier of fact need not weigh each straw in its load to see which one could have done the deed. A trier of fact is entitled to consider the totality of the offensive conduct. (*Woodland Joint Unified School Dist. v. Commission on Professional Competence* (1992) 2 Cal.App.4th 1429, 1456-1457.)

#### *Persistent Violation of or Refusal to Obey Laws*

9. The word "persistent" is defined by lexicographers as "refusing to relent; continuing, especially in the face of opposition . . . stubborn; persevering . . . constantly repeated." (*Governing Board of the Oakdale Union School District v. Seaman* (1972) 28 Cal.App.3d 77, 82.) A single violation of a school board's rules is not of itself cause for the dismissal of a permanent teacher. Education Code section 44932, subdivision (a)(8), violations pertain to unintentional as well as intentional transgressions, and hence the Legislature has decreed that a single violation is not sufficient to warrant dismissal, apparently to allow for correction; "it is the persistent disregard" of school rules that the subdivision is designed to regulate. (*Id.* at p.84.)

10. A violation of Education Code section 44932, subdivision (a)(8), must also be established by reference to the *Morrison* factors. If unfitness to teach is shown, then the District must further establish that employee's refusal to follow the laws or regulations was "persistent," i.e., "stubborn and continuing." (*San Dieguito Union High School District v. Commission on Professional Competence* (1985) 174 Cal.App.3d 1176, 1183.) Isolated incidents or incidents involving an issue unresolved over a period of time are not generally considered "persistent." (*Bourland v. Commission on Professional Competence* (1985) 174 Cal.App.3d 317.)

#### *Dishonesty*

11. "Dishonesty necessarily includes the element of bad faith. As defined in the dictionaries and in judicial decisions, it means fraud, deception, betrayal, faithlessness. [Citations.] As put by the court in *Alsup v. State*, 91 Tex. Cr. 224, 'dishonesty denotes an absence of integrity; a disposition to cheat, deceive or defraud; deceive and betray.'" (*Hogg v. Real Estate Commissioner* (1942) 54 Cal.App.2d 712, 717.)

12. In *Fontana Unified School District v. Burman* (1988) 45 Cal.3d 208, 220, fn 12, the California Supreme Court required application of the *Morrison* factors to the determination of "dishonesty," noting: "Dishonest conduct may range from the smallest fib to the most flagrant lie. Not every impropriety will constitute immoral or unprofessional conduct, and not every falsehood will constitute 'dishonesty' as a ground for discipline." (*Ibid.*)

### *Evaluation of Appropriate Discipline Given the Commission's Findings*

13. Ms. Bradshaw-McKerring's use of phrases when communicating with Parent 3 such as "a little bird told me so please keep this information for your eyes only," "as ever... you know I will keep you informed," this is "highly unprofessional of me" and instructing Parent 3 to provide an alternative explanation for how Parent 3 obtained the information Ms. Bradshaw-McKerring was sharing, followed by the word "wink;" Ms. Bradshaw-McKerring's use of phrases when communicating with Parent 2 such as "just a little bird with some info," "mum's the word my friend," and "mum is the word;" and her use of phrases "for ur eyes only," "for us eyes only," and "mum's the word" when sending emails to staff and unknown individuals, demonstrated that she was aware that she should not be sharing the information she was providing. Moreover, in one of her texts to Parent 3, Ms. Bradshaw-McKerring admitted that her criticizing Green Elementary School staff was "highly unprofessional of me." Her admission demonstrated that she was aware, at least on some level, that her behavior was inappropriate. However, she repeatedly disclosed confidential information despite her misgivings. A preponderance of the evidence established that she persistently violated, or refused to obey, district policies.

The district's residency form that she signed under penalty of perjury was false. Ms. Bradshaw-McKerring failed to own up to her action of providing false information under penalty of perjury and made excuses for her conduct. A preponderance of the evidence established that her conduct was dishonest.

Having established the causes alleged, the next step is to determine the appropriate discipline. Applying the *Morrison* factors to this case, the evidence established that:

- (1) Not only was it likely, but Ms. Bradshaw-McKerring's conduct adversely affected students, parents and fellow teachers to a great extent;
- (2) Her conduct was fairly recent, taking place between 2012 and 2015;
- (3) She was the school psychologist which required her to be especially vigilant about maintaining the confidential and privileged information she possessed;
- (4) The extenuating circumstances were the lack of district involvement and principal/administrator leadership on the campus such that Ms. Bradshaw-McKerring thought her actions were helpful. However, the tone of her communications and her acknowledgments in them that she was acting unprofessionally and/or disclosing information that she should not, was an aggravating factor, as was her providing a false residency declaration to the district;
- (5) Although Ms. Bradshaw-McKerring's testimony about her good intentions, and the chaos on the campus made some of her actions understandable, those factors were insufficient to warrant her disclosure of privileged and confidential information, and there was nothing praiseworthy about her false declaration of residency;


(6) Given the amount of information she disclosed, the many people to whom she disclosed it, her lack of ownership of her actions when she testified, and her failure to acknowledge her inappropriate actions, coupled with the many references in her texts acknowledging that she was disclosing confidential or privileged information, it is likely that her conduct would recur; and

(7) It is highly unlikely that dismissing her from employment would adversely impact or have a chilling effect on the constitutional rights of teachers.

### ORDER

Ms. Bradshaw-McKerring's appeal of her dismissal from employment with the San Diego Unified School District is denied. The district's request to dismiss Ms. Bradshaw-McKerring is granted. Ms. Bradshaw-McKerring shall be dismissed from the district.


Dated: December 29, 2016

  
MARY AGNES MATYSZEWSKI  
Administrative Law Judge  
Office of Administrative Hearings

Dated: January 11, 2016

  
Tamatha Parker  
Commission Member

Dated: January 8, 2017

  
Ursula Sack, Ph.D.  
Commission Member