

## VII.B.

**Connecticut State Board of Education  
Hartford**

**To Be Proposed:**

September 7, 2022

**Resolved**, That the State Board of Education, pursuant to subsection (a) of Section 10-153f of the Connecticut General Statutes, recommends Attorney Janis Jerman for appointment as an impartial arbitrator representing the interests of the public in general, and directs the Commissioner to take the necessary action.

Approved by a vote of \_\_\_\_\_ this seventh day of September, Two Thousand Twenty-Two.

Signed: \_\_\_\_\_  
Charlene M. Russell-Tucker, Secretary  
State Board of Education

**Connecticut State Board of Education  
Hartford**

TO: State Board of Education

FROM: Charlene M. Russell-Tucker, Commissioner of Education

DATE: September 7, 2022

SUBJECT: Appointment of an Impartial Arbitrator

**Introduction**

Collective bargaining between school boards and certified staff is regulated by the Teacher Negotiation Act (TNA), Conn. Gen. Stat. Section 10-153a *et seq.* This Act prohibits strikes by such school employees and instead provides for impasse resolution through binding arbitration of disputes in negotiations. Pursuant to the TNA, if an agreement has not been reached within the period prescribed therein, the parties (the board of education and the union) must name, by mutual agreement, a single impartial arbitrator or, in the alternative, a panel of three arbitrators consisting of their respective party arbitrators and an impartial arbitrator. Arbitrators must be selected from the Arbitration Panel of the State Department of Education (SDE).

Subsection (a) of Section 10-153f of the Connecticut General Statutes ("C.G.S.") requires the Governor to appoint, with the advice and consent of the General Assembly, not less than 24 nor more than 29 members of the SDE Arbitration Panel. Of these panel members, not less than 10 or more than 15 shall be impartial arbitrators representing the interests of the public in general, selected from the list of names submitted by the State Board of Education ("SBE"). Currently, there are eight impartial arbitrators on the Arbitration Panel.

The Governor appoints impartial arbitrators for a four-year term from a list of names submitted by the SBE. The screening process of the SBE is contained within Sections 10-153f-4 through 8, inclusive, of the Regulations of Connecticut State Agencies ("Regulations"). I have attached a copy of the Regulations for your information as Attachment 1.

**Discussion**

The process for recruitment is detailed in the Regulations, which require extensive and specific qualifications for eligibility and an intricate process for reviewing applications, conducting interviews, and selecting candidates. Candidates, at a minimum, must be residents of Connecticut, have extensive experience in public sector collective bargaining and interest impasse resolution, knowledge and experience in conducting hearings, knowledge of the TNA, other relevant labor laws, public sector finance, contract negotiation, and labor relations. Candidates are selected by a group of representatives from the teachers' and administrators' unions, municipalities, state agencies and boards of education. Pursuant to the regulations, the vote of the interview committee in favor of a candidate must be unanimous.

Impartial arbitrators are not employees of the SDE and serve only if selected by the parties for a specific arbitration hearing. Each person appointed as an impartial arbitrator receives a per diem fee for any day during which he or she is engaged in the arbitration of a dispute. Such per diem rate is set by the individual arbitrator in accordance with the prevailing rate for such services. The parties to the dispute pay the per diem fee directly to the arbitrator. Each arbitrator shall serve a term of four years but shall continue to serve as an arbitrator until a successor is appointed.

At its meeting on September 1, 2021, the SBE requested that the Division of Legal and Governmental Affairs (DLGA) make efforts to diversify the arbitration panel. In its effort to discuss efforts to diversify the panel and identify qualified candidates, DLGA conducted a focus group of representatives from the following organizations:

- American Arbitration Association
- Asian Pacific American Bar Association
- Commission on Women, Children, Seniors and Opportunity (which includes the sub-committees on African Affairs and Latino & Puerto Rican Affairs)
- Connecticut Association of Boards of Education;
- Connecticut Bar Association
- Connecticut Conference of Municipalities
- Connecticut Education Association
- Connecticut Women's Education and Legal Fund
- Connecticut Hispanic Bar Association
- The George W. Crawford Law Association

In addition, DLGA staff engaged in discussions with the State Board of Labor Relations, which recruits and selects a panel of arbitrators which provides arbitration services to employers, as well as employee organizations designated to represent employees, in both the public and private sector when there is a dispute over the application or interpretation of the terms of a written collective bargaining agreement. Through these discussions, it has become apparent that the pool of qualified candidates that meet the statutory and regulatory requirements is small. Without significant opportunities, training and recruitment of attorneys and labor relations specialists early in their careers, the pool of qualified candidates will continue to be limited.

In its effort to solicit applications, DLGA placed advertisements in general circulation newspapers, on its website and newspaper websites. In addition, the following organizations were notified:

- American Arbitration Association
- American Federation of Teachers-Connecticut (AFT-CT)
- Asian Pacific American Bar Association
- Commission on Women, Children, Seniors and Opportunity (which includes the sub-committees on African Affairs and Latino & Puerto Rican Affairs;)
- Connecticut Association of Boards of Education (CABE)

Connecticut Bar Association  
Connecticut Conference of Municipalities  
Connecticut Education Association (CEA)  
Connecticut Women's Education and Legal Fund  
Connecticut Hispanic Bar Association  
Fairfield Bar Association  
George W. Crawford Law Association  
Greater Danbury Bar Association  
Hartford County Bar Association  
Litchfield County Bar Association  
Milford Bar Association  
New Haven Bar Association  
South Asian Bar Association  
Waterbury Bar Association

DLGA received six applications. As required by the Regulations governing the composition of the application screening committee, a screening committee consisting of six members, including the Commissioner's designee, representatives of local and regional boards of education, exclusive bargaining representatives of certified professional employees, and local legislative and fiscal authorities reviewed the applications. The screening committee consisted of the following members:

John Khalil, DLGA (Commissioner's Representative)  
Tara Shaw, Attorney, City of Waterbury (Board of Education)  
Nicolas Grello, Zangari, Cohn, Cuthbertson, Duhl & Grello PC (Board of Education)  
Peter Sousa, Town of Windsor, Connecticut (Municipality)  
James Tessitore, CEA (Union)  
Ben Wenograd, AFT-CT (Union)

As required by the Regulations, the screening committee determined which candidates would be interviewed based on the committee's review of applications for the necessary minimum qualifications. Of the six applicants, the screening committee selected two to be interviewed.

The Division of Legal and Governmental Affairs coordinated the interviews on August 2, 2022. The composition of the interview committee is also governed by the applicable Regulations. In accordance with the Regulations, the interview committee consisted of the following members:

Gwaina Wauldon, Connecticut Technical Education Career System (State Agency)  
Laura Anastasio, DLGA, Department of Education (Commissioner's Representative)  
Megan Krom, Office of Policy and Management (State Agency)  
Christine Chinni, Chinni & Associates (Board of Education)  
Rebecca Santiago, Shipman & Goodwin LLP (Board of Education)  
Patrice McCarthy, CABA (Board of Education)  
Tom Kennedy, CEA (Union)  
Mike Ozga, AFT-CT (Union)  
Anthony Salvatore, Connecticut Federation of School Administrators (Union)

Anthony Salvatore, Town Manager, Town of Cromwell (Municipality)  
Arosha Jayawickrema, Town Manager, Town of Berlin (Municipality)  
Brian O'Connor, Connecticut Conference of Municipalities (Municipality)

The applicants were interviewed in accordance with the Regulations. As noted above, all interviewers must agree to recommend a candidate. The interviewers agreed to recommend one candidate for appointment as an impartial arbitrator.

Pursuant to the provisions of subsection (a) of Section 10-153f of the C.G.S., the list of arbitrator names submitted to the Governor by the SBE shall include a report "certifying that the process conducted for soliciting applicants made adequate outreach to minority communities and documenting that the number and make-up of minority applicants considered reflect the state's racial and ethnic diversity." Although this year's recruitment effort did make considerable outreach efforts, none of the two candidates selected for interviews were minority candidates.

### **Recommendation**

The interview panel has recommended Attorney Janis Jerman to the SBE for submission to the Governor as a new appointment to the Arbitration Panel. Attorney Jerman's resume and application are attached to this report as Attachment 2.

### **Follow-up Activities**

Upon approval by the SBE, DLGA will submit the names of the recommended arbitrator to the Governor for approval. If the candidate is appointed, there will be 9 impartial arbitrators on the Arbitration Panel. However, the statute requires a minimum number of 10 arbitrators. Therefore, DLGA is planning to conduct the recruitment process in 2023 to increase the number of available impartial arbitrators.

Prepared by: Laura L. Anastasio, Attorney  
Division of Legal and Governmental Affairs

Reviewed by: Michael P. McKeon, Director  
Division of Legal and Governmental Affairs

# Attachment 1

**Sec. 10-153f-2. Definitions**

As used in Sections 10-153f-2 to 10-153f-12, inclusive:

- (a) "Applicant" means an individual who is seeking appointment to the panel as an impartial arbitrator.
- (b) "Board" means the State Board of Education.
- (c) "Commissioner" means the Commissioner of Education.
- (d) "Experience" means three years of responsible active participation in public sector collective bargaining interest impasse resolution.
- (e) "Mock award" means any public sector interest arbitration award written by an applicant while serving as an intern to an impartial arbitrator. These awards are written for the sole and exclusive purpose of completing the requirements of the arbitrator intern program (see Section 10-153f-12 of these regulations) and will be available only to the Commissioner or his representative. They are neither binding upon the parties nor accorded any force and effect of law.
- (f) "Panel" means the arbitration panel established pursuant to Section 10-153f of the General Statutes, as may be amended from time to time.
- (g) "Party" means an employing board of education or exclusive bargaining representative directly involved and affected by a dispute.
- (h) "Public sector collective bargaining interest impasse resolution" means mediation, factfinding or interest arbitration but not grievance or rights arbitration.

(Effective May 24, 1991)

*Regulations of Connecticut State Agencies*

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**Sec. 10-153f-3. Role of the board**

The role of the Board under Sections 10-153f-1 to 10-153f-12, inclusive, of these regulations is limited to matters relating to the nomination of applicants to be appointed to the panel of impartial arbitrators and the evaluation of impartial arbitrators so appointed.

(Effective May 24, 1991)

**Sec. 10-153f-4. Impartial arbitrator qualifications**

(a) Impartial arbitrators shall be representatives of the public in general.

(b) An impartial arbitrator must not currently be, nor within two years of application have been, an advocate of public or private sector employers or employer organizations or public or private sector employees or employee organizations. An advocate is an individual who represents an organization in matters of personnel and labor relations, including but not limited to: unit determination and exclusive representation; collective bargaining; grievance adjustment; arbitration; unfair labor practices and labor-related litigation; wage and benefit administration; equal employment opportunity; unemployment compensation; and occupational health or safety standards.

(c) An impartial arbitrator shall be a resident of Connecticut.

(d) An impartial arbitrator shall be experienced in public sector collective bargaining interest impasse resolution.

(e) An impartial arbitrator must possess:

(1) knowledge of the Connecticut Teacher Negotiation Act and other labor laws relevant to the public sector;

(2) knowledge of hearing procedures and the ability to conduct arbitration hearings and to develop an accurate record of proceedings;

(3) knowledge of and application of the principles of arbitrator ethics;

(4) knowledge of the labor relations concepts, principles and practices of contract negotiation and administration;

(5) knowledge of the limits of arbitrator authority;

(6) knowledge of the basic tenets of public sector finance, particularly municipal finance;

(7) ability to evaluate the costs of wage and fringe benefits and improvements;

(8) ability to write clear and comprehensive arbitration awards;

(9) ability to complete the written award within statutory timelines; and

(10) commitment to the public interest.

(Effective May 24, 1991)

**Sec. 10-153f-5. Application**

(a) An applicant may apply for appointment as an impartial arbitrator by filing an application with the Office of Legal Affairs, Department of Education, 165 Capitol Avenue, Hartford, Connecticut, 06106.

(b) An applicant must provide clear, complete and accurate information on the application, during an interview and throughout the application process. Failure to do so shall result in rejection of application.

(c) An applicant attempting to influence any member of the Board, the Commissioner, the staff of the Department of Education or any person involved with the screening of applicants regarding nomination or appointment to the panel through means other than the formal selection process will be rejected and permanently barred from reapplying for nomination.

(Effective May 24, 1991)

**Sec. 10-153f-6. Review of applications**

(a) At such times deemed appropriate by the Commissioner, applications shall be reviewed.

(b) Applications will be screened by a committee of not less than five persons appointed by the Commissioner. The committee shall include the Commissioner's designee, representatives of local and regional boards of education, exclusive bargaining representatives of certified professional employees employed by local or regional boards of education, and local legislative and fiscal authorities.

(c) Application review shall be the preliminary screening method used to determine whether an applicant appears to have minimum qualifications sufficient to invite for an interview, i.e. they are Connecticut residents and are experienced in public sector collective bargaining interest impasse resolution.

(d) Applicants shall be rated by the application review committee as "qualified for an interview" or "not qualified for an interview." If a majority of the application review committee indicates that an applicant is "qualified for an interview," then an invitation will be extended. If a majority of the application review committee indicates that an applicant is "not qualified for an interview," then the applicant will be so notified.

(Effective May 24, 1991)

**Sec. 10-153f-7. Interview**

(a) The Commissioner shall appoint an interview committee. Interviews shall be coordinated by the Commissioner's designee, who shall serve as chairperson of the committee. The committee shall include: three representatives of local and regional boards of education; three representatives of exclusive bargaining representatives of certified professional employees employed by local or regional boards of education; three representatives of local legislative and fiscal authorities; and three representatives of public or private neutral dispute resolution agencies which shall include the Commissioner's designee.

(b) The interview committee shall evaluate applicants on the factors contained in Section 10-153f-4 (e) of these regulations and rate candidates using the following scale:

(1) UNSATISFACTORY: Applicant's performance on the factor is well below the level required for effective job performance.

(2) MARGINAL: Applicant's performance on the factor is at a level below the level required for effective job performance.

(3) SATISFACTORY: Applicant's performance on the factor is at a satisfactory level for effective job performance.

(4) GOOD: Applicant's performance on the factor is clearly above the level required for effective job performance.

(5) EXCELLENT: Applicant's performance on the factor is at a superior level of extremely high quality.

(c) In order to be recommended by the committee, all committee members must give the applicant an overall rating of satisfactory or better. Names of applicants who achieve such a cumulative rating shall be forwarded to the Commissioner.

(Effective May 24, 1991)

**Sec. 10-153f-8. Role of the commissioner**

(a) The Commissioner shall review the recommendations of the interview committee. For good cause, the Commissioner may direct the interview committee to review again an unsuccessful applicant.

(b) The Commissioner shall forward the list of recommended applicants to the Board for action.

(Effective May 24, 1991)

## Attachment 2

**Janis C. Jerman**  
PO Box 2151  
New Britain, CT  
(860) 518-5656  
[Janis@JJerman.com](mailto:Janis@JJerman.com)

April 24, 2022

Attorney Laura L. Anastasio  
Connecticut State Department of Education  
Division of Legal and Governmental Affairs  
P.O. Box 2219  
Hartford, CT 06145-2219  
[Via email only laura.anastasio@ct.gov](mailto:laura.anastasio@ct.gov)

Dear Attorney Anastasio,

Please accept this letter and attached resume and Arbitrator Application as my expression of interest in serving as a per diem impartial arbitrator under Section 10-153f of the Connecticut General Statutes. I have served as a neutral arbitrator and impartial hearing officer in various capacities for twenty-five years. I currently serve as an impartial hearing officer for the State Board of Education on cases relating to special education, school accommodations, expulsion, declaratory rulings, unit clarification petitions, revocation or denial of educator certificates and permits, and other proceedings pursuant to the Uniform Administrative Procedure Act.

In the last two years, I have not been an advocate of a public or private sector employer or employer organization or of public or private sector employees or employee organizations for matters relating to personnel or labor relations.

From 2001 to 2018, I had responsibility for personnel matters including wage and benefit administration, equal employment opportunity, and unemployment compensation for private sector employers that were not unionized.

As a practicing attorney from 1993 to 2001, I represented individual employees in discrimination, employment contract, and statutory benefits cases. I also collaborated on a contract basis with labor lawyers on variety of legal matters, including public and private sector labor law. Through that work, I have more than three years' active experience in public sector collective bargaining interest impasse resolution and knowledge of collective bargaining and interest arbitration, including the Connecticut Teacher Negotiation Act and public sector labor laws.

I run a very efficient and organized hearing. Party feedback indicates that I'm organized, fair, reasonable, and quick to understand the issues. I have excellent research and writing skills, and I am confident in my abilities to serve as a neutral arbitrator representing the public interest in Connecticut.

Thank you for your consideration.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Janis C. Jerman', with a stylized, flowing script.

Janis C. Jerman

Attachment: Resume and Arbitrator Application

**Janis C. Jerman**  
(860) 518-5656  
[Janis@JJerman.com](mailto:Janis@JJerman.com)

## PROFESSIONAL EXPERIENCE

### **Neutral Arbitrator/Hearing Officer**

**1995-present**

Self-employed neutral arbitrator and hearing officer providing services to public agencies and private parties. Current contracts with Connecticut State Board of Education (special education, school accommodations, expulsion, declaratory rulings, unit clarification petitions, revocation or denial of educator certificates and permits, and other proceedings pursuant to the Uniform Administrative Procedure Act). Formerly provided dispute resolution services to Judicial Branch and Department of Consumer Protection.

### **EMPLOYEE FAMILY PROTECTION, INC., Glastonbury, CT**

**2011-2020**

*National, privately held entrepreneurial employee benefits communication, education, and enrollment firm for government, union, and private corporations and organizations.*

### **Chief Compliance & Communications Officer (2014-2020)**

Oversee corporate compliance including management and employee compliance with regulatory agencies, credentialing services, insurance carriers, and vendor contracts. Develop and implement corporate training programs and oversee corporate brand management.

### **Chief Operating Officer (2011-2014)**

As first COO, led initiatives that improved organizational processes and infrastructure; supported growth strategy; and defined long-term vision. Strategic and operational leader for finance, human resources, enrollment services, case administration, customer service, sales support, training, marketing, and technology.

### **CONNECTICUT BAR ASSOCIATION, INC., New Britain, CT**

**2001-2009**

*Non-profit voluntary membership association for lawyers.*

### **Associate Executive Director (2006-2009)**

### **Director of Administration & Finance (2001-2006)**

Chief operating officer for 501(c)(6) organization and 501(c)(3) affiliate accountable for operations, human resources, strategic planning, compliance, contract administration, and corporate outreach. Supervised staff managing finance, IT, facilities, production/fulfillment, business insurances, event planning, and member affinity programs. Directed external affairs including marketing and communications, member service center, publications, website, continuing legal education, professional certification, and public outreach.

### **LAW OFFICE OF JANIS C. JERMAN, Hartford, CT**

**1993-2001**

*Private law practice*

### **Attorney**

Solo practitioner with successful labor and employment law practice primarily representing employees in discrimination, employment contract, and statutory benefits cases. Collaborated on a contract basis with lawyers on variety of legal matters, including public and private sector labor law.

**SYSTEMATICS, INC. (now Fidelity National Information Services), Little Rock, AR      1987-1990**  
*International software firm providing in-house data-processing function for financial institutions.*

***Senior Systems Engineer***

Computer programmer and business analyst. Completed management trainee program in half the scheduled time, allowing earlier work on billable matters. Selected by international headquarters to participate in special task force to analyze client banks' business processes and utilization of firm's proprietary software.

**EDUCATION**

Juris Doctorate, University of Connecticut School of Law  
Bachelors' Degree in Psychology, Purdue University

**LICENSES**

Admitted to practice law in Connecticut state courts and U.S. District Court for the District of Connecticut

**RECOGNITIONS & COMMUNITY ACTIVITIES**

- Partners for Andean Community Health Board of Directors (current treasurer)
- New Britain Emergency Medical Services Board of Directors (past chair)
- CW Resources Board of Directors (past chair)
- Community Foundation of Greater New Britain Board, Audit Committee and Catalyst Fund Member
- 2009 Paul Harris Award from New Britain-Berlin Rotary Club for exemplary performance in personal, professional, and community arenas; 2004 Rotarian of the Year; 2014 and 2018 Rotary Club Special Recognition
- 2005 Rotary Foundation Group Study Exchange Team Leader to Argentina for one month cultural and vocational exchange
- 2004-06 New Britain Ethics Commission (past chair)
- 2001 New Britain YWCA Women in Leadership Award
- 1998 Hartford Courant Volunteer Recognition Award

**CONNECTICUT STATE DEPARTMENT OF EDUCATION  
ARBITRATOR APPLICATION**

Jerman, Janis Corinne

1. Name (last, first, middle)

2. Home Address (No. and Street)

New Britain, CT

06052

(860) 518-5656

3. Home City and State

4. Zip

5. Home Phone + Area Code

janis@jerman.com

6. E-Mail Address

Neutral Arbitrator/Hearing Officer

7. Current Employment or Profession

Self-employed

8. Present Organization

PO Box 2151

9. Business Address (No. and Street)

New Britain, CT

10. Business City and State

06050-2151

11. Zip

(860) 518-5656

12. Business Phone + Area Code, Fax Number + Area Code

1995 to present

13. From (date) \_\_\_\_\_ to Present

Neutral Arbitrator/Hearing Officer

14. Exact Title of Present Position

15. Describe Current Responsibilities:

Self-employed Neutral Arbitrator and Hearing Officer providing services to public agencies and private parties. Current contracts with Connecticut State Board of Education (special education, school accommodations, expulsion, declaratory rulings, unit clarification petitions, revocation or denial of educator certificates and permits, and other proceedings pursuant to the Uniform Administrative Procedure Act). Formerly provided dispute resolution services to Judicial Branch and Department of Consumer Protection.

16. Does your current employment or professional activity involve representation, advocacy, or participation in decision making for labor organization or employers in any capacity? ☐ Yes ☒ No

Comment:

No; my current employment/professional activity does not involve representation, advocacy, or participation in decision making for labor organization or employers in any capacity. My work is restricted to neutral arbitration and hearing officer services.

17. Have you been a labor or employment advocate or representative of a union, employee organization or employer?

Yes; from 1993 to 2001, I was a solo practitioner with a successful labor and employment law practice primarily representing employees in discrimination, employment contract, and statutory benefits cases. In addition, I worked with multiple labor and employment attorneys on a contract

basis on labor and employment matters including representation and advocacy on behalf of labor unions in collective bargaining matters and grievance hearings.

From 2001 to 2018, while employed by private organizations, I oversaw human resources and served as advocate and representative on employment matters on behalf of the non-unionized employers.

18. A. Significant Past Professional Experience (Title/Organization) ☐ Neutral ☒ Advocate Years \_\_\_\_ to \_\_\_\_  
Attorney, Law Office of Janis C. Jerman Labor Advocate 1993-2001

B. Significant Past Professional Experience (Title/Organization) ☐ Neutral ☒ Advocate Years \_\_\_\_ to \_\_\_\_  
Associate Executive Director (2006-09) and Director of Administration & Finance (2001-06),  
Connecticut Bar Association, Inc. Employer Advocate

C. Significant Past Professional Experience (Title/Organization) ☐ Neutral ☒ Advocate Years \_\_\_\_ to \_\_\_\_  
Chief Operating Officer (2011-14) and Chief Compliance & Communications Officer (2014-20),  
Employee Family Protection, Inc. Employer Advocate (2011-18)

D. Significant Past Professional Experience (Title/Organization) ☐ Neutral ☒ Advocate Years \_\_\_\_ to \_\_\_\_

E. Significant Past Professional Experience (Title/Organization) ☐ Neutral ☒ Advocate Years \_\_\_\_ to \_\_\_\_

<u>University of Connecticut School of Law</u>	<u>Juris Doctor</u>	<u>1993</u>	<u>Law</u>
19. Education A. Institution	Degree	Year	Major

<u>Purdue University</u>	<u>Bachelor of Arts</u>	<u>1987</u>	<u>Psychology</u>
B. Institution	Degree	Year	Major

C. Institution	Degree	Year	Major
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<u>Connecticut Law License</u>			<u>1993-present</u>
20. Certification(s): Profession/Trade	Certificate/License	Issued By	Year

21. Umpire or Permanent Panel Member for Dispute Resolution (name company and union)  
A. From \_\_\_\_ to \_\_\_\_

B. From \_\_\_\_ to \_\_\_\_

C. From \_\_\_\_ to \_\_\_\_

22. Total Number of Cases Heard as an Arbitrator:

\_\_\_\_ FMCS    \_\_\_\_ AAA    \_\_\_\_ Pri Ref    \_\_\_\_ PERM Ump    300+ State Agency    10+ Other (private parties)

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23. Labor Arbitration Roster of which you are a member (for example, AAA, Fed, State)

A.

B.

C.

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24. Professional Affiliations in Labor Relations (NAA-AA-IRRA-SPIDR)

A.

B.

C.

A handwritten signature in black ink, appearing to be "Amir" followed by a stylized flourish.

April 18, 2022

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Signature

Date

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