



STATE OF NEW JERSEY

In the Matter of Marion Wilson Camden County, Department of Corrections

CSC DKT. NO. 2017-74 OAL DKT. NO. CSV 10302-16 FINAL ADMINISTRATIVE ACTION
OF THE
CIVIL SERVICE COMMISSION

ISSUED: JUNE 7, 2017

BW

The appeal of Marion Wilson, County Correction Sergeant, Camden County, Department of Corrections, demotion to County Correction Officer effective June 28, 2016, on charges, was heard by Administrative Law Judge Carl V. Buck, III, who rendered his initial decision on May 5, 2017. Exceptions were filed on behalf of the appellant and a reply to exceptions was filed on behalf of the appointing authority.

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Having considered the record and the Administrative Law Judge's initial decision, and having made an independent evaluation of the record, the Civil Service Commission (Commission), at its meeting on June 7, 2017, accepted and adopted the Findings of Fact and Conclusion as contained in the attached Administrative Law Judge's initial decision.

ORDER

The Commission finds that the action of the appointing authority in demoting the appellant was justified. The Commission also affirms the Administrative Law Judge's decision to impose an additional five working day suspension. The Commission therefore affirms these actions and dismisses the appeal of Marion Wilson.

Re: Marion WIlson

This is the final administrative determination in this matter. Any further review should be pursued in a judicial forum.

DECISION RENDERED BY THE CIVIL SERVICE COMMISSION ON JUNE 7, 2017

Robert M. Cycl

Robert M. Czech Chairperson

Civil Service Commission

Inquiries and Correspondence

Director
Division of Appeals and Regulatory Affairs
Civil Service Commission
Unit H
P. O. Box 312
Trenton, New Jersey 08625-0312

Attachment



INITIAL DECISION

OAL DKT. NO. CSV 10302-16 AGENCY DKT. NO. 2017-74

IMO MARION WILSON, CAMDEN COUNTY DEPARTMENT OF CORRECTIONS.

William B. Hildebrand, Esq., for Marion Wilson, appellant

Antonieta P. Rinaldi, Esq., for Camden County Department of Corrections, respondent (Christopher A. Orlando, County Counsel, attorney)

Record Closed: March 23, 2017

Decided: May 5, 2017

BEFORE CARL V. BUCK, III, ALJ:

STATEMENT OF THE CASE

The Camden County Department of Corrections Facility ("Camden" or "CCDOC" or "respondent") seeks to demote Sergeant Marion Wilson ("Wilson" or "appellant") from Sergeant to Corrections Officer. That action resulted from her actions on September 10, 2015, and from her posting of improper remarks in the "pass on" books maintained for her unit.

Sergeant Wilson contends that the penalty for the violation exceeds the level of reasonableness.

PROCEDURAL HISTORY

On June 28, 2016, the CCDOC issued a Final Notice of Disciplinary Action (31-B) sustaining the above charges, and demoting Wilson from Sergeant to Corrections Officer, effective June 28, 2016. (R-1)

Appellant appealed the demotion and the Civil Service Commission transmitted the matter to the Office of Administrative Law (OAL), <u>N.J.S.A.</u> 52:14B-1 to -15; <u>N.J.S.A.</u> 52:14F-1 to -13 for hearing as a contested case. On March 23, 2017, a hearing was held and concluded. The record was closed on March 23, 2017.

FINDINGS OF FACT

(1) Failure to comply with CCDOC directives

The following facts are not in dispute. Appellant has been an employee of the CCDOC since August 26, 1996. She was promoted to Sergeant on November 28, 2004. On September 10, 2015, she was assigned to 2 South A Mod (2 S A), the special needs/high risk unit of the Camden County Correction's facility. Correction officers working in this unit must comply with additional safety precautions.

Lieutenant Douglas Grundlock has been employed by the CCDOC for approximately twenty years, the last two years as a Lieutenant. He was the shift commander for the 7:00 a.m.–7:00 p.m. shift on September 10, 2015. He testified as to the background of, information on, and specific procedures for employees on the 2 S A unit.

Those procedures were detailed in a directive to "All Personnel" from Deputy Warden James J. Simon (Simon) on "05, July 2006". This directive states, inter alia, that:

The 2 South A, (B& C) officers will make checks every five (5) minutes, and note it in the composition book. If for any reason the officer cannot complete the check within the five minutes they will so note it in the logbook.

And

Supervisors must tour the area and if needed lend assistance to the assigned officers. The Shift Commander will tour the area at least once per shift, review logs and sign off on it. (R-3)

Further, clarifying procedures to be followed regarding 2 S A were detailed in a directive to "All Personnel" from Simon on "15, August 2006". This directive states, inter alia, that:

The Officer will continue to place the inmates name along their assigned cells. As well a (sic) posting checks every five minutes. These logs will be reviewed, signed by the supervisor and turned in with the daily paperwork for each shift. (R-3)

Additional clarifying procedures to be followed regarding 2 S A were detailed in a directive to "All Personnel" from Simon on "08, September 2006". This directive states, inter alia, that:

Close Watch checks must be maintained every 5 minutes, unless other direction is given by mental health or the medical department. Noe these checks will be logged on the respective logs.

Supervisors must tour the area and if needed lend assistance to the assigned officers. (R-3)

Grundlock testified that on September 10, 2015, appellant was assigned as the second-floor supervisor on to 2 South A Mod on the 7:00 a.m. to 7:00 p.m. shift. He then narrated a video showing the chronology of events of that date. (R-4)

The video showed that at approximately 07:57:15 on September 10, 2017, appellant entered 2 S A and began to sign paperwork prepared by the two Correction

Officers detailed to 2 S A. These Officers were Christopher Burch and David Crossan. This paperwork is "CAMDEN COUNTY DEPARTMENT OF CORRECTIONS 2- SOUTH A (B-OFFICER) POST LOG" (R-5) and "CAMDEN COUNTY DEPARTMENT OF CORRECTIONS 2- SOUTH A (C-OFFICER) POST LOG." (R-6)

The post log(s) that appellant signed contained entries showing that Officers Burch and Crossan conducted close watch checks during the period appellant was in 2 S A. However, the video did not show that the officers conducted any close watch checks during the period 07:57:15 to 08:09:24. At approximately 08:09:24 appellant began a security check with Correction Officer's Burch and Crossan. At approximately 08:10:23 appellant exited 2 S A. (R-4)

Lieutenant Grundlock, as the "Shift Commander" for the 7:00 a.m. to 7:00 p.m. shift, had access to review cameras within the entire jail facility. At a certain point, Grundlock stated that he became aware that proper protocols on 2 S A were not being followed. Grundlock notified his superior, Captain Taylor who, in turn, notified Warden David Owens. Grundlock stated that he reassigned appellant at approximately 11:40 a.m. At that time appellant stated she threw everything away in her pockets. She also stated that she exited her computer. Lieutenant Grundlock requested that appellant turn over her tour notes and post logs for that morning. Appellant told Lieutenant Grundlock she did not have a post log. Lieutenant Grundlock then asked her for tour notes. Appellant told Lieutenant Grundlock that she had thrown everything she had in the trash.

Subsequently, Lieutenant Grundlock called the IT department which retrieved a draft of the supervisor's log from appellant's computer. (R-7) Lieutenant Grundlock also collected appellant's trash which trash did not reveal any notes.

Grundlock subsequently issued a Supervisor's Staff Complaint Report on 09-10-2015 regarding this incident. (R-2)

By a Preliminary Notice of Disciplinary Action (31-A), dated October 21, 2015, Respondent issued a notification to appellant that charges regarding this incident were made against appellant. The charges read:

N.J.A.C. 42:2-3(a)(1) Incompetency, Inefficiency, Perform Failure to Duties; N.J.A.C. 4A:2-2.3(a)(2) Insubordination; N.J.A.C. 4A:2-2.3(a)(6) Conduct Unbecoming; N.J.A.C. 4A:2-2.3(a)(7) Neglect of Duty; N.J.A.C. 4::2-2.3(a)(12) Other Sufficient Cause; C.C.C.F. Rules of Conduct: 1.1 Violations in General; 1.2 Conduct Unbecoming; 1.3 Neglect of Duty; 1.4 Insubordination; 2.10 Inattentiveness to Duty; 3.1 Supervision; 3.2 Security; 3.6 Departmental reports; General Oder #73, #74; Supervisor General Order #001; et. al. (R-1).

(2) Failure to comply with Department of Corrections protocol regarding "pass on book"

Captain Linda Blackwell has been employed by the CCDOC for approximately 20 years, most recently as a Captain. She is familiar with this case and her primary job responsibility is to make sure that CCDOC policies are being followed. She testified she had received a call from Captain Karen Taylor (now Warden at CCDOC) regarding notations in the "pass on" books. Blackwell's investigation documented that on numerous occasions, appellant had made or written unprofessional and improper remarks in the 2 South Mod "pass on" book (R-9). The "pass on book" is intended to notify subsequent shifts of any conditions or issues in the unit which are of note. These remarks were made on September 20, 2015, September 29, 2015, October 7, 2015, October 16, 2015, October 18, 2015, October 22, 2015, and November 14, 2015.

Blackwell subsequently issued a Supervisor's Staff Complaint Report on 12-07-2015 regarding this incident. (R-9)

The complaint stated that "...[b]ooks are not for personal opinions and the information is strictly so that the oncoming (sic) shift knows if there were ... incidents that occurred. Sergeant Wilson is a Supervisor of this Department and is held to a

higher standard therefor I am recommending disciplinary charges against her for unprofessional comments made in the 'pass on' book." (R-9)

By a Preliminary Notice of Disciplinary Action (31-A), dated February 5, 2016, respondent issued a notification to appellant that charges regarding this incident were made against appellant. The charges read:

N.J.A.C. 42:2-3(a)(1) incompetency, Inefficiency, Failure to Perform Duties; N.J.A.C. 4A:2-2.3(a)(2) Insubordination; N.J.A.C. 4A:2-2.3(a)(6) Conduct Unbecoming; N.J.A.C. 4A:2-2.3(a)(7) Neglect of Duty; N.J.A.C. 4::2-2.3(a)(12) Other Sufficient Cause; C.C.C.F. Rules of Conduct: 1.1 Violations in General; 1.2 Conduct Unbecoming; 1.3 Neglect of Duty; 1.4 Insubordination; 2.10 Inattentiveness to Duty; 3.1 Supervision; 3.2 Security; 3.6 Departmental reports: General Oder #73, #74; Supervisor General Order #001; et. al. (R-1).

Warden Karen Taylor (Captain at the time of the incidents) has been employed by the CCDOC for approximately twenty years, being appointed as Warden approximately five months ago and before that as a Captain. She is familiar with this case and testified on behalf of the respondent.

She had spoken with Lieutenant Grundlock regarding the issue at 2 S A. Grundlock advised her of the actions he was taking regarding the 2 S A incident.

She had spoken with Captain Linda Blackwell regarding the notations in the "pass on" books. Blackwell's investigation documented that on numerous occasions, appellant had made or written unprofessional and improper remarks in the 2 South Mod "pass on" book. (R-9)

Warden Taylor discussed the various infractions for which petitioner was cited. In addition to the failure to perform, neglect of duty and conduct unbecoming, etc. there are very specific rules regarding the 2 S A unit. She detailed the violations to Rules 1.2, 1.3, 1.4, 3.1, 3.2, 3.6, and 2.0 and to General Orders 001, 073, and 074.

Warden Taylor discussed how the rules relate to security and safety at 2 S A. Petitioner was in charge of the second floor and was responsible for that floor and to guarantee that protocols were being followed and that appropriate close watch checks were being made. Warden Taylor's position was that the appellant's action(s) constituted a serious infraction, and that the resulting risk to safety and security of inmates and other officers to the extent that she lost faith in appellant being able to be a supervisor.

Marion Wilson testified on her own behalf. She is a Sergeant at the CCDOC, where she has worked since August 26, 1996, the first seven and a half years as a corrections officer. She did not dispute the information and time sequence revealed in the video. (R-4) She stated that she was at the 2 S A unit for thirteen minutes that she should only have been at the unit for two to three minutes. She stated that she takes responsibility for what happened during those thirteen minutes. She did state that she was unaware that Officers Burch and Crossan were falsifying information in the reports she had signed. (R-5, R-6) She further stated that when she signed the reports that notations before 07:56 were on the documents, but nothing after 08:00 was filled in.

She stated that Lieutenant Grundlock relieved her at 11:40 a.m. and at that time she threw everything away in her pockets. Grundlock then told appellant she was relieved and she stated that she then exited her computer. In the hall, Grundlock requested her log and she stated that she did not have the log (in the hall), so she stated she did not have the log. She stated that she did not believe she was being insubordinate during this exchange.

As to the comments written in the "pass on" books, appellant admitted that she had made the comments but she did not think they were bad. She did admit that the comments were unprofessional. She stated that there was no training on how to fill in pass on books and that she had been filling in information in pass on books for several years.

Appellant stated that she applied for retirement in December 2016.

Based on the record before me regarding the incident of September 10, 2015, I FIND that the appellant did not comply with the protocols and general orders of the CCDOC on September 10, 2015. Specifically, in that appellant did not perform her duties as a supervisor, did not follow the appropriate rules of conduct, was insubordinate to her supervisor, showed an inattentiveness to duty, failed to supervise those employees for whom she was responsible, did not file or prepare appropriate reports, did not comply with General Orders 073 and 074 and Supervisor General Order 001.

Based on the record before me regarding the incidents of comments placed in the "pass on" books of September 20, 2015, September 29, 2015, October 7, 2015, October 16, 2015, October 18, 2015, October 22, 2015, and November 14, 2015 I FIND that the appellant did not comply with the protocols and general orders of the CCDOC. Specifically, in that appellant did not comply with appropriate rules of conduct, did not file or prepare reports in an appropriate manner, engaged in conduct unbecoming a supervisor, did not comply with General Orders 073 and 074 and Supervisor General Order 001.

LEGAL ANALYSIS AND CONCLUSION

N.J.S.A. 11A:2-6 authorizes the Commission to remove, suspend, fine or demote a permanent career employee. Rules promulgated by the Department of Personnel set forth various reasons for discipline, including "conduct unbecoming a public employee." N.J.A.C. 4A:2-2.3. On appeals from disciplinary action, the Board may redetermine guilt or modify a penalty originally imposed. N.J.S.A. 11A:2-19; Henry v. Rahway State Prison, 81 N.J. 571 (1980). The Board is empowered to substitute its own judgment on the appropriate penalty, even if the local appointing authority has not clearly abused its discretion. Henry, supra, 81 N.J. at 579. In appeals from disciplinary actions, the appointing authority bears the burden of proof by a preponderance of the credible evidence. N.J.A.C. 4A:2-1.4(a); Atkinson v. Parsekian, 37 N.J. 143, 149 (1962).

Respondent charged appellant, inter alia, with insubordination and neglect of duty. "Insubordination" is not defined in the regulation. Assuming that its presence is implicit, courts generally apply its ordinary definition since it is not a technical term or word of art and there are no circumstances indicating that a different meaning was intended. Ricci v. Corporate Express of the East, Inc., 344 N.J. Super. 39, 45-46 (App. Div. 2001). Black's Law Dictionary (7th Ed. 1999) defines insubordination as a "willful disregard of an employer's instructions" or an "act of disobedience to proper authority." To give one other example, Webster's New International Dictionary 1288 (2d Ed. 1943) defines insubordinate as "not submitting to authority; disobedient; mutinous." See also Jeffrey F. Ghent, J.D., Annotation, What Constitutes "Insubordination" As Ground for Dismissal of Public School Teacher, 78 A.L.R.3d 83 (1977); A. L. Schwartz, Annotation, Employee's Insubordination As Barring Unemployment Compensation, 26 A.L.R.3d 1333 (1969). Similarly, "neglect of duty" can arise from an omission or failure to perform a duty and includes official misconduct or misdoing, as well as negligence. Generally, the term "neglect" connotes a deviation from normal standards of conduct. In re Kerlin, 151 N.J. Super. 179, 186 (App. Div. 1977). Neglect of duty implies nonperformance of some official duty imposed upon a public employee, not merely commission of an imprudent act. Rushin v. Bd. of Child Welfare, 65 N.J. Super. 504, 515 (App. Div. 1961).

Corrections officers are held to a high standard of conduct both on and off the job. <u>In re Phillips</u>, 117 <u>N.J.</u> 567, 577 (1990). Maintenance of strict discipline is important in military-like settings such as police departments, prisons and correctional facilities. <u>Rivell v. Civil Serv. Comm'n</u>, 115 <u>N.J. Super.</u> 64 (App. Div.), <u>certif. denied</u>, 59 <u>N.J.</u> 269 (1971); <u>Mayberry v. Massey</u>, 93 <u>N.J. Super.</u> 317 (App. Div. 1967).

Respondent's rules of conduct detail rules to be followed by all employees of the Corrections Facility. R-10. Directives as to activity on the 2 S A Mod are given, with specificity, in the 08, September 2006 memorandum from Simon and states:

Close Watch checks must be maintained every 5 minutes, unless other direction is given by mental health or the

medical department. Noe these checks will be logged on the respective logs. (R-3)

These are not "suggestions" or "guidelines" - but directives. They are a subject of mandatory compliance and are required for the safety of the inmates who have an expectation of safety and care from CCDOC as well as the other employees of CCDOC for whom a level of safety and care is also expected.

This matter involves a major disciplinary action brought by the respondent against the appellant seeking a demotion from Sergeant to Officer. The appellant is charged with failure to perform duties, insubordination, conduct unbecoming, neglect of duty, and other sufficient cause. She is also charged with violating Rules of Conduct: 1.1 Violations in General; 1.2 Conduct Unbecoming; 1.3 Neglect of Duty; 1.4 Insubordination; 2.10 Inattentiveness to Duty; 3.1 Supervision; 3.2 Security; 3.6 Departmental reports; General Order #73, #74; Supervisor General Order #001; et. al.

The charges all relate to the appellant's activities relating to the event of September 10, 2015. Appellant does not dispute the forgoing violations, and I have found as fact that she did in fact violate all the foregoing rules. In addition to the undisputed testimony, there is a video which corroborates all the foregoing undisputed facts.

PENALTY

When determining the penalty to be imposed, the Commission must consider an employee's prior disciplinary actions. West New York v. Bock, 38 N.J. 500, 523 (1962). Respondent imposed a demotion from Sergeant to Officer for the cumulative charges as detailed. Appellant's past disciplinary record reflects several similar offenses committed within the preceding seventeen years (seven within the past seven years) and a number (approximately nine) of what would be classified as minor disciplinary charges within the same time frame.

Once a determination is made that an employee has violated a statute, rule,

regulation, etc., concerning his/her employment, the concept of progressive discipline must be considered. West New York v. Bock, 38 N.J. Super. 500 (1962). While this case did not specifically use the phrase "progressive discipline," its facts strongly suggest that a record of progressive discipline should precede the ultimate penalty, which is removal. The concept of progressive discipline involves consideration of the number of prior disciplinary infractions, the nature of those infractions and the imposition of progressively increasingly penalties. It is well settled that correction officers, like police officers are held to a higher standard of conduct than other public employees because of the sensitive nature of the position they occupy. Twp. of Moorestown v. Armstrong, 89 N.J. Super. 560 (App. Div. 1965), cert, denied, 47 N.J. Super. 80 (1966). It has also been noted in corrections cases, that failure to adhere to security precautions could have potentially serious consequences, which may give rise to a more serious penalty regardless of the lack of any past disciplinary consequences. I /M/O Martha Hicks and Antonio Price, OAL Dkt. Nos. CSV 11373 and CSV 11494-13; 2014 N.J. Agen. Lexis 469 (2014).

The appellant received a demotion from Sergeant to Officer for the foregoing violations. These violations were not only a violation of her specific duties, but critical to security and safety of inmates and fellow employees.

Appellant's attorney has argued, inter alia, that the severity of the penalty is not warranted as the demotion would prove a substantial financial hardship to appellant (who, since the events in question, has filed for service retirement). This is a fallacious argument. The safety and security of the CCDOC should be the utmost concern of any employee and particularly a supervisory employee. The financial impact of such penalty can in no way be compared to the potential impact of appellants' action (or inaction).

Appellant's attorney also compares the present incident to one for which appellant previously received a thirty-day suspension. The comparison is erroneous as the matter in question deals with violations of specific directives for an area of the jail facility known to warrant specific and direct attention (close watch checks) and is

specifically designated as the special needs/high risk unit of the facility.

With regard to the charges relating to the "pass on" books, appellants' attorney argues that the discipline relating to the "pass on book" does not rise to the level of demotion. In that argument, I concur.

I CONCLUDE that the penalty of demotion from Sergeant to Officer is appropriate under the circumstances as the charges relating to September 10, 2015 are sustained. Appellant's past disciplinary record reflects several similar offenses committed within the preceding seventeen years (7 within the past seven years) and a number (approximately nine) of what would be classified as minor disciplinary charges within the same time frame. I also note appellant's lack of remorse and the fact that these infractions jeopardized the security of inmates and other employees in the facility as aggravating factors in this case. I therefore, CONCLUDE that the demotion from sergeant to officer is appropriate under these circumstances.

appropriate under the circumstances of the events as detailed in the complaint of December 7, 2015 and is not sustained. Although appellant's lack of remorse is evident, and these comments could have proved embarrassing to CCDOC, these infractions did not jeopardize the security of inmates or other employees in the facility. These statements as made by appellant in the "pass on" books do constitute a violation to the CCDOC General Order #001, Supervisor General Responsibility; General Order #073, Personal Conduct of Employees; and General Order #074 Professional Code of Conduct. I therefore, CONCLUDE that the demotion from sergeant to officer is not appropriate under the circumstances concerning comments in the pass on book and that a five-day suspension with counselling is warranted for those violations.

DECISION AND ORDER

I hereby ORDER that the charges be AFFIRMED, and the demotion from Sergeant to Officer be SUSTAINED and that a separate five-day suspension with

counselling be ordered.

I hereby **FILE** my Initial Decision with the **CIVIL SERVICE COMMISSION** for consideration.

This recommended decision may be adopted, modified or rejected by the CIVIL SERVICE COMMISSION, which by law is authorized to make a final decision in this matter. If the Civil Service Commission does not adopt, modify or reject this decision within forty-five days and unless such time limit is otherwise extended, this recommended decision shall become a final decision in accordance with N.J.S.A. 52:14B-10.

Within thirteen days from the date on which this recommended decision was mailed to the parties, any party may file written exceptions with the DIRECTOR, DIVISION OF APPEALS AND REGULATORY AFFAIRS, UNIT H, CIVIL SERVICE COMMISSION, 44 South Clinton Avenue, P.O. Box 312, Trenton, New Jersey 08625-0312, marked "Attention: Exceptions." A copy of any exceptions must be sent

to the judge and to the other parties.

1	May 5,	2017
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DATE

Date Received at Agency:

Date Mailed to Parties:

/lam

CARL V. BUCK III, ALJ

LIST OF EXHIBITS

For appellant:

P-1	Preliminary Notice of Disciplinary Action, dated October 12, 2015		
P-2	Revised Preliminary Notice of Disciplinary Action, dated February 2, 2016		
P-3	Final Notice of Disciplinary Action, dated June 28, 2016		
P-4	Memo, dated September 8, 2006		
P-5	Supervisors log, dated September 10, 2015		
P-6	Respondent's Certified Interrogation Answers, dated November 4, 2016		
P-7	Petitioner's Document Request, dated November 15, 2016		
P-8	Petitioner's Second Document Request, dated November 16, 2016		
P-9	Quotation of retirement benefits, dated January 6, 2017		
P-10	Excerpts from State of New Jersey PFRS Member handbook		
P-11	Life Expectancies Table for All Races and Both Sexes Appendix I to New Jersey		
	Court Rules		

For respondent:

- R-1 Preliminary Notice of Disciplinary Action (31A), dated October 21, 2015

 Preliminary Notice of Disciplinary Action (31A), dated February 5, 2016
- R-2 Supervisor's Staff Complaint Report authored by Lieutenant Douglas Grundlock, dated September 10, 2015
- R-3a Memorandum from Deputy Warden Simmons, dated July 5, 2016
- R-3b Memorandum from Deputy Warden Simmons, dated August 15, 2006
- R-3c Memorandum from Deputy Warden Simmons, dated September 8, 2006
- R-4 Video and 2SA Chrono
- R-5 2 South A (B-Officer) Post log authored by C/O Christopher Burch, dated September 10, 2015

- R-6 2 South A (C-Officer) Post log authored by C/O David Crossan, dated September 10, 2015
- R-7 Supervisor's Log by Sergeant Marion Wilson, dated September 10, 2015
- R-8 2 South Mod pass on notes
- R-9 Supervisor' Staff Complaint Report authored by Captain Blackwell, dated December 7, 2015
- R-10 Camden County Department of Corrections Rules of Conduct
- R-11 Camden County Department of Corrections General Order #001 Supervisor General Responsibility
- R-12 Camden County Department of Corrections General Order #073 Personal Conduct of Employees
- R-13 Camden County Department of Corrections General Order #074 Professional Code of Conduct
- R-14 Sergeant Marion Wilson Chronology of Discipline

LIST OF WITNESSES

For appellant:

Marion Wilson

For respondent:

Douglas Grundlock

Linda Blackwell

Karen Taylor