



## STATE OF NEW JERSEY

In the Matter of Thalia Tretsis  
Middlesex County, Sheriff's Office

CSC DKT. NO. 2018-2711 and 2018-  
1572

OAL DKT. NO. CSR 18651-17 and  
05113-18

**(Consolidated)**

FINAL ADMINISTRATIVE ACTION  
OF THE  
CIVIL SERVICE COMMISSION

ISSUED: MAY 1, 2020 BW

The appeals of Thalia Tretsis, Sheriff's Officer, Middlesex County, Sheriff's Office, removals effective September 29, 2017 and November 14, 2017, on charges, were heard by Administrative Law Judge Sarah G. Crowley, who rendered her initial decision on March 12, 2020. Exceptions were filed on behalf of the appellant and a reply to exceptions was filed on behalf of the appointing authority.

Having considered the record and the ALJ's initial decision, and having made an independent evaluation of the record, the Civil Service Commission (Commission), at its meeting on April 29, 2020, accepted and adopted the Findings of Fact and Conclusion as contained in the attached ALJ's initial decision as well as her recommendation to modify the removals to a resignation in good standing.

ORDER

The Civil Service Commission finds that the action of the appointing authority in removing the appellant was justified. However, the Commission modifies the removal of Thalia Tretsis to a resignation in good standing.

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  
THE 29<sup>TH</sup> DAY OF APRIL, 2020

*Deirdre L. Webster Cobb*

Deirdré L. Webster Cobb  
Chairperson  
Civil Service Commission

Inquiries  
and  
Correspondence

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

Attachment



**State of New Jersey**  
OFFICE OF ADMINISTRATIVE LAW

**INITIAL DECISION**

**IN THE MATTER OF THALIA TRETSIS,  
MIDDLESEX COUNTY (SHERIFF'S  
OFFICE).**

OAL DKT. NO. CSR 18651-17

And

**IN THE MATTER OF THALIA TRETSIS,  
MIDDLESEX COUNTY (SHERIFF'S  
OFFICE).**

OAL DKT. NO. CSR 05113-18

**CONSOLIDATED**

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**Catherine M. Elston, Esq.,** for appellant (C. Elston & Associates, LLC, attorneys)

**Benjamin D. Leibowitz,** Senior Deputy County Counsel, for respondent (Paul R. Adezio, County Counsel)

Record Closed: January 28, 2020

Decided: March 12, 2020

**BEFORE SARAH G. CROWLEY, ALJ**

**STATEMENT OF CASE AND PROCEDURAL HISTORY**

Appellant, Thalia Tretsiss (appellant) was employed by the Middlesex County Sheriff's Department as a sheriff's officer. On March 6, 2015, she fell in the parking lot at work and injured her knee. After conservative treatment and physical therapy, she

returned to work on light duty in August 2015. Due to unrelated personal medical issues, she went out on unpaid leave from June 29, 2016 to December 31, 2016. Due to continuing difficulty with her knee, surgery was performed in January of 2017. In June of 2017, she returned to work with restrictions, but due to persistent issues with the knee, she went back out on leave. She was sent for an FCE exam in June, and again in September 2017. The September 18, 2017, FCE concluded that appellant had reached maximum medical improvement (MMI) and was unable to perform the duties of her job as sheriff's officer.

On September 28, 2017, a Preliminary Notice of Disciplinary Action (PNDA) was served. A departmental hearing was conducted on October 25, 2017. On November 14, 2017, a Final Notice of Disciplinary Action (FNDA) was issued, sustaining the charges and finding appellant unable to perform the essential functions of her job. Her removal was effective September 29, 2017. An amended FNDA was served which modified the removal date to November 14, 2017. Appellant filed an appeal and the matter was transmitted to the Office of Administrative Law (OAL) as a contested case. N.J.S.A. 52:14B-1 to 15 and 14F-1 to 13. Hearings were conducted on September 26, 2018, September 11, 2019, September 20, 2019, October 18, 2019, November 15, 2019, and November 21, 2019. The record closed after submission of closing briefs by the parties on January 28, 2020.

### TESTIMONY AND FINDINGS OF FACT

#### *For respondent*

**Maureen Thompson** is an employee benefits specialist for the Middlesex County Sheriff's Department. She handles workers compensation claims. She explained the procedure for processing workers compensation claims for County workers. Ms. Thompson was familiar with appellant's case and processed her claim after she fell on the ice in the parking lot at work on March 6, 2015. Appellant was taken to an urgent care facility after her fall and was referred to an orthopedic doctor for an injury to her knee. She went to see Dr. Hosea, an orthopedic doctor and treated with him through July of 2015. She underwent conservative treatment, cortisone shots, anti-inflammatory

medication and physical therapy. She then saw another orthopedic doctor, Dr. Warshauer, and was released to return to light duty in August 2015. The workers compensation case was closed at that time.

Thereafter, due to personal unrelated medical issues, appellant went out on unpaid leave from June 29, 2016 through December 31, 2016. Due to continuing issues with the same knee, her case was reopened, and Dr. Gallick performed arthroscopy surgery on January 5, 2017. Appellant underwent physical therapy and had several follow up appointments with Dr. Gallick. Dr. Gallick advised in his report that most people return to work full duty after twelve weeks of rehabilitation or an MMI is ordered. He reported that she could return to light duty in February if they had light duty available. His notes indicate that in April appellant was still reporting soreness and weakness in her knee. Appellant reported to him in May that she was still unable to run, was suffering from discomfort and soreness in her knee. At that point he gave her three more weeks of rehab but indicated that he would send her for an FCE and consider her MMI after that.

After being returned to light duty, appellant obtained a note from her own doctor that she was unable to work due to her ongoing knee issues. She was given time to get a second opinion on her MMI and her ability to return to full duty. Appellant went to see Dr. Epstein for a second opinion. He had her undergo another FCE on September 18, 2017. The report indicated that she had reached MMI and had permanent limitations. She had reported her limitations to Dr. Epstein, and he indicated that ample time had been given for recovery and rehabilitation and appellant was unable to perform the duties of her job and was at MMI. Ms. Thompson testified that based on these reports and the FCEs the PNDA was issued, and subsequently, the FNDA was issued.

**Monica A. Lynch** is the Director of Kinematic Consultants, Inc. She testified for the Sheriff's Office regarding the Functional Capacity Examination performed on the appellant. She testified that the company is privately run and is not affiliated with the County. They do a lot of testing on employees from law enforcement and public entities. She received training on the job and has a bachelor's degree in bioengineering. She has been working for the company for twenty years. She discussed the process of completing an FCE and indicated that they followed all the usual protocols in doing the FCE on the

appellant. They tested the appellant's ability to lift and the strength of their arms and legs. They use computerized technology to measure the strength and movement of the individuals they are testing. She testified that they used all the normal protocols on appellant. All the equipment is tested on a regular basis to ensure the accuracy of the equipment.

They received a request from Dr. Epstein and Dr. Gallick to perform an FCE examination on appellant. There were FCE exams conducted: the final one was performed on September 18, 2017. She discussed the different parts of the exam and the reports that were prepared in connection with the appellant's FCE exams. She discussed the balance test and indicated that the appellant had a deficit in balances on the right side. This was consistent with the injury to the right knee. In addition, she failed to meet the minimum requirements for the strength test. The test involved pushing and pulling and is to measure her overall ability to lift and pull. The tests are repeated a number of times to assure that they are an accurate reflection of the individual's abilities to perform the duties that are essential for their job. The results indicated that appellant was only able to meet the requirements of light duty work. She also pointed out that the appellant reported pain in the right knee, which increased with bending, standing or walking. She testified that the results of the exam are given to the employer and they make the ultimate determination.

**Dr. Gregory Gallick, M.D.** testified by Skype. He was accepted as an expert in orthopedic medicine. He was also a fact witness and had treated the appellant in his capacity as a worker's compensation doctor for Middlesex County. He evaluated the appellant the first time in December 2016. She had suffered a work-related injury on March 6, 2015 to her right knee. He reviewed the medical records that had been provided. She had been treating conservatively with physical therapy for some time, and he recommended an arthroscopy of the right knee and a lateral release. He opined that patients who undergo arthroscopy are usually returned to light duty for a short period of time and are capable of full duty within three months. The surgery was performed on January 5, 2017. He prescribed some medication and physical therapy following the surgery. A few weeks after the surgery, the appellant was still in significant pain, so he continued physical therapy and kept her out of work. When he saw her again in mid-

February, she was still having pain in her knee. However, he cleared her for return to light duty. When he saw her again in March, over three months after the surgery, she advised him that she was still in some pain and had trouble going up and down the stairs, was unable to run, and had weakness in her knee. He hoped that her strength would continue to increase and again recommended light duty and continued physical therapy.

Dr. Gallick saw appellant again on April 14, 2017 and May 10, 2017. Both times, she advised him that she was still unable to run and had pain and weakness in her right knee. Since it had been four months since the surgery with little progress, he thought that it was time that appellant have an FCE. He believed that she was at maximum medical improvement as she had made little to no progress in the last month or so, and that patients with this injury and treatment were able to return to full duty or were at MMI at three or four months. He examined her again on May 31, 2017. She was still reporting the same issues of pain, discomfort and weakness in the knee and an inability to run. He recommended an FCE examination which was conducted on June 8, 2017. After his review of the results of the FCE, he opined in his expert medical opinion that she had reached maximum medical improvement and was unable to perform the duties of a sheriff's officer. She had limitations on her ability to lift over a certain weight. In addition, she had pain and weakness in her knee and was unable to run.

The appellant wanted a second opinion, so she went to Dr. Epstein for an evaluation in August of 2019. He likewise recommended an FCE which was conducted by Kinematic on September 18, 2017. Based on his review of that FCE and the notes from Dr. Epstein, he also concluded that appellant had reached MMI and was unable to perform the duties of her job. He also reiterated that he had performed thousands of similar knee surgeries and that MMI is reached after three or four months. The appellant had the surgery on January 5, 2017 and was still complaining of pain in September when the additional FCE was completed. She had been in physical therapy for almost nine months and no improvements were being made. He testified that in his expert medical opinion she had reached MMI. He also opined that the FCE exams performed by Kinematic were accurate and the lifting limitations and the limitations in the knee were accurate and prevented her from performing the duties of sheriff's officer.

**Dr. David Epstein** also testified by Skype. Dr. Epstein was qualified as an expert in orthopedic surgery and was also called as a fact witness. He evaluated the appellant on July 13, 2017. Appellant sought a second opinion on her knee following her evaluation with Dr. Gallick and the MMI that had been issued based upon the FCE conducted by Kinematic. He noted that she was still experiencing pain and discomfort in her right knee. Due to her ongoing pain, he recommended that she receive gel injections. He hoped that she would improve after the injection on August 15, 2017 and hoped that she would be able to return to full duty in a few weeks. Although she received some relief from the injection, he opined that on September 7, 2017, she was still experiencing pain in her knee, and he recommended another FCE which was conducted on September 26, 2017. He did not recommend another injection, as it did not bring much relief. In addition, the appellant was still experiencing pain and was taking medication for pain and inflammation. The final FCE revealed that appellant was still not capable of full duty. She had significant limitations and was still reporting pain. He concluded in his expert medical opinion to a reasonable degree of medical certainty that appellant had reached MMI and was unable to perform the duties of a sheriff's officer.

**Undersheriff Kevin Harris** is the Middlesex County Undersheriff. He had been in that position for seven months. Prior to that position he was a police officer in Piscataway Township for over twenty years. His duties at the Middlesex County Sheriff's Office include discipline of employees. He reviews all the proposed discipline before it goes to the Sheriff. He reviewed the notes from the personnel department and prepared the PNDA for appellant on September 28, 2017. His issuance of the PNDA was predicated on the FCE that was prepared by Kinematic and the opinions of Dr. Gallick and Dr. Epstein. There was a report prepared internally that he reviewed in connection with his determination. The report reviewed the FCEs as well as the medical reports from both Dr. Gallick and Dr. Epstein both of whom opined that appellant had reached MMI. She was injured in March of 2015, received physical therapy, injections as well as surgery, and was still not cleared to return to work full duty. There were three separate FCE examinations that were completed and they each indicated that the appellant had permanent restrictions. He reviewed the FCEs as well as the supporting reports and the civil service job description in making a recommendation to the Sheriff.



Undersheriff Harris discussed some of the duties of the sheriff's officers. Officers must be able to restrain individuals in the courtroom if they get unruly. In addition, if you get into a struggle with someone you need to be able to restrain them, so any weight restriction is significant. He concluded based upon the duties of the sheriff's officer, a review of the FCE and the doctor's reports that appellant had reached MMI and had permanent restrictions which rendered her unfit to serve as a sheriff's officer.

**For appellant**

Dr. Ronal R. Polakoff, M.D. was qualified as an expert in orthopedic surgery. He performed an independent medical examination of the appellant on May 1, 2019, four years after the accident, and almost two years after her removal. He conducted an examination of her knee and reviewed the duties of the sheriff's officer and concluded that she was able to perform the duties of a sheriff's officer. He could not provide an opinion as to whether she was able to perform the duties in September of 2017. However, he testified that in his expert opinion she had not reached MMI, since she was currently able to perform the duties of a sheriff's officer. He performed a number of tests of her physical abilities to perform her job and concluded that within a reasonable degree of medical certainty, she was currently able to perform the duties of a sheriff's officer.

**FINDINGS OF FACT**

The resolution of the claims made by the appellant requires that I make a credibility determination regarding the critical facts. The choice of accepting or rejecting the witnesses' testimony or credibility rests with the finder of fact. Freud v. Davis, 64 N.J. Super. 242, 246 (App. Div. 1960). In addition, for testimony to be believed, it must not only come from the mouth of a credible witness, but it also must be credible. It must elicit evidence that is from such common experiences and observation that it can be approved as proper under the circumstances. See Spagnuolo v. Bonnet, 16 N.J. 546 (1954); Gallo v. Gallo, 66 N.J. Super. 1 (App. Div. 1961). A credibility determination requires an overall assessment of the witnesses' story considering its rationality, internal consistency and the way it "hangs together" with the other evidence. Carbo v. United States, 314 F.2d 718,749 (1963). A fact finder is free to weigh the evidence and to reject the testimony of

a witness, even though not directly contradicted, when it is contrary to circumstances given in evidence or contains inherent improbabilities or contradictions which alone, or in connection with other circumstances in evidence, excite suspicion as to its truth. In re Perrone, 5 N.J. 514. 521-22 (1950). See D'Amato by McPherson v. D'Amato, 305 N.J. Super. 109, 115 (App. Div. 1997).

Having had an opportunity to carefully observe the demeanor of the witnesses, it is my view, that Dr. Gallick, Dr. Epstein, Ms. Thompson and Undersheriff Harris were credible. As to the testimony of Dr. Polakoff, he provided no credible testimony on the issue of appellant's condition on the date of MMI or about the validity of the FCE examinations.

Accordingly, I find the following as **FACT**:

1. Appellant injured her right knee on March 6, 2015.
2. She treated conservatively with physical therapy for several months and was cleared to return to work light duty in August of 2015.
3. She worked light duty until she went out on a leave for an unrelated medical issue from June 28, 2016 through December 31, 2016.
4. After continuing pain in her knee, she underwent arthroscopy on the right knee on January 7, 2017.
5. Appellant did physical therapy and home exercises following the surgery for several month. She also received gel injections in her knee.
6. Appellant reported continued pain and weakness in her right knee to Dr. Gallick and Dr. Epstein.

7. The FCE examinations performed in August and September of 2017 demonstrated that the appellant was at Maximum Medical Improvement and could not perform the duties of a Sheriff's Officer.
8. On September 28, 2017 the appellant had reached MMI and was unable to perform the duties of a Sheriff's Officer.

Accordingly, I **FIND** as **FACT** that the appellant had reached maximum medical improvement and was unable to perform the duties of sheriff's officer as of the date of her removal.

### LEGAL ANALYSIS

An initial issue to be address in this matter is the proper date to determine MMI in a Civil Service case. In the Matter of Kamal Abdelall, Bayonne Housing Authority, <http://njlaw.rutgers.edu/collections/oal/final/csv12994-11.pdf>, a laborer had been injured on the job in February 2011. An FCE was performed on June 9, 2011, and on July 14, 2011, the orthopedic doctor placed the appellant at MMI, with permanent restrictions for light/medium category work with occasional lifting up to thirty-five pounds. The Housing Authority issued a Preliminary and a Final Notice of Disciplinary Action and removed Abdelall for inability to perform duties, effective as of August 5, 2011. Eighteen days later, on August 23, 2011, the appellant's personal physician determined that he was able to return to full duty with no restrictions. Concluding that the effective date of removal had already occurred prior to the date on which the personal physician had cleared the appellant to return to full duty with no restrictions, the administrative law judge upheld the removal. The sole issue was whether the appellant was fit for duty as of the date of removal. As a result, the physician's clearance permitting a return-to-work after the date of removal was irrelevant. The Civil Service Commission adopted the judge's decision, but modified the termination to a resignation in good standing, citing Newark v. Bellezza, 159 N.J. Super. 123, 128 (App. Div. 1978).

In a more recent case, the same issue was raised regarding a corrections officer's fitness for duty. The Civil Service Commission affirmed a decision where the ALJ found

that the date of appellant's fitness for duty is determined on the date of the removal. In the Matter of Erica Davis-Smith, Mercer County Department of Public Safety, 2018 WL 3717581 (NJ OAL dkt NO. CSR 16665-2016, decided July 17, 2018) aff'd 2019 WL 5561410 (Dkt No. A-0374T18T13) (decided October 20, 2019). That case addressed the issue of an opinion by a doctor that at a later date she was fit for her duty. The ALJ found, and the Civil Service Commission affirmed that the date for determination of fitness for duty is the date of the FCE exam, not some later date.

In this matter, the appellant was injured in March of 2015. After treating conservatively for five months, she was returned to work on light duty in August 2015. She went out on a leave from June 2016 to December 2016 for an unrelated medical issue. In September 2017 appellant went to see Dr. Gallick, who ultimately recommended arthroscopy surgery, which was performed on January 5, 2017. Appellant continued with physical therapy and home exercises after the surgery. In April and May 2017, appellant was still reporting pain and weakness in the knee and an inability to run. She went back out on workers compensation based on her own doctor advising her of her inability to work. Thereafter, in June and September she was sent for FCE examinations. The FCE concluded that she had reached MMI and was unable to perform the duties of sheriff's officer. I have found as fact based upon the expert testimony of Dr. Gallick and Dr. Epstein and the documentary evidence that the appellant had reached MMI and was unable to perform the duties of her job.

I have found the testimony of Dr. Gallick and Dr. Weinstein credible, as well as the testimony from Ms. Lynch from Kinematic. All the reports and tests demonstrate, and I **CONCLUDE**, that at the time of the appellant's removal she had reached maximum medical improvement and was unable to perform the duties of a sheriff's officer and was therefore not fit for duty. Dr. Polakoff's testimony did not address appellant's ability to perform her job in September of 2017, when she was removed from her position as a sheriff's officer. An appointing authority is not required to wait three, four or five years for an individual to return to duty. By the appellant's own admission to Dr. Gallick and Dr. Epstein, she continued to experience weakness and limitations in September of 2017. I therefore **CONCLUDE** that the appellant had reached maximum medical improvement and was incapable of performing the duties of her position at the time of her termination.

**ORDER**

It is hereby **ORDERED** that the decision of the appointing authority to remove appellant based on her inability to perform the duties of her job is **AFFIRMED**, and the appeal is **DISMISSED**. However, as the reason for this separation was her inability to perform her job due to physical injury and not as the result of any conduct or action that is worthy of discipline, in accordance with prior decisions, I **ORDER** that her termination is hereby **MODIFIED** to a resignation in good standing.

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. 40A:14-204.

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, PO 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.

March 12, 2020

DATE

  
\_\_\_\_\_  
SARAH G. CROWLEY, ALJ

Date Received at Agency:

March 12, 2020

Date Mailed to Parties:

March 12, 2020

SGC/cb

## **APPENDIX**

### **WITNESSES**

#### **For appellant:**

Dr. Ronal R. Polakoff, M.D.

#### **For respondent:**

Maureen Thompson, Middlesex County employee benefits specialist

Monica A. Lynch, Director of Kinematic Consultants, Inc.

Dr. Gregory Gallick, M.D.

Dr. David Epstein

Kevin Harris, Middlesex County undersheriff

### **EXHIBITS**

#### **For appellant:**

- A-1 Middlesex County Human Resources Police ("To be Adopted January 4, 2017" cover page)
- A-2 Middlesex County Sheriff's Office Employee Evaluation Report for Officer Tretsis – Evaluation Period November 2014 to October 2015
- A-3 Middlesex County Sheriff's Office Employee Evaluation Report for Officer Tretsis – Evaluation Period November 2015 to October 2016
- A-4 Dr. Warshauer Report, dated August 26, 2016
- A-5 Civil Service Job Specification for Sheriff's Officer (download date October 6, 2017, with check marks)
- A-6 Dr. Donald R. Polakoff's CV
- A-7 Dr. Donald R. Polakoff's Report
- A-8 One Page Handwritten Document showing at top handwriting "Thalia Tretsis, D/A 3/6/15"

**For respondent:**

- R-1 CV of Monica A. Lynch, Director of Kinematic Consultants, Inc. Functional Capacity Evaluation Department/Biomedical Engineer
- R-2 Kinematic Consultants, Inc. Functional Capacity Exam of Tretsis (#1) on August 17, 2015
- R-3 Kinematic Consultants, Inc. Functional Capacity Exam of Tretsis (#2) on June 6, 2017
- R-4 Kinematic Consultants, Inc. Functional Capacity Exam of Tretsis (#3) on September 18, 2017
- R-5 New Jersey Civil Service Commission Job Specification for Sheriff's Officer
- R-6(a) Tretsis 3/6/15 – 1st Report of Injury, dated March 6, 2015
- R-6(b) Employee's Accident Report, dated March 6, 2015
- R-6(c) Supervisor's Accident Investigation Report, dated March 6, 2015
- R-7(a) Dr. Warshauer's report, dated August 12, 2015
- R-7(b) Dr. Warshauer's report, dated August 26, 2015
- R-7(c) Dr. Warshauer's report, dated February 10, 2016
- R-8(a) Dr. Hosea's report of April 8, 2015 exam
- R-8(b) Dr. Hosea's report of April 29, 2015 exam
- R-8(c) Dr. Hosea's report of May 18, 2015 exam
- R-8(d) Dr. Hosea's report of June 8, 2015 exam
- R-8(e) Dr. Hosea's report of June 24, 2015 exam
- R-8(f) Dr. Hosea's report of July 8, 2015 exam
- R-8(g) Dr. Hosea's report of July 29, 2015 exam (Dr. Hosea passed away on August 8, 2015)
- R-9 Dr. Gallick's Operating Report of January 5, 2017
- R-10(a) Dr. Gallick's report of exam on December 9, 2016
- R-10(b) Dr. Gallick's report on exam on January 9, 2017
- R-10(c) Dr. Gallick's report of exam on January 25, 2017
- R-10(d) Dr. Gallick's report of exam on February 22, 2017
- R-10(e) Dr. Gallick's report of exam on March 21, 2017



- R-10(f) Dr. Gallick's report of exam on April 14, 2017
- R-10(g) Dr. Gallick's report of exam on May 10, 2017
- R-10(h) Dr. Gallick's report of exam on May 31, 2017 and June 20, 2017
- R-10(i) Continuation of Dr. Gallick's report of exam on June 20, 2017
- R-10(j) Dr. Gallick's letter of June 27, 2017 to attn. Susan Zurick
- R-11(a) MRI report and addendum of exam on April 6, 2015
- R-11(b) MRI report exam on June 19, 2015
- R-11(c) MRI report of exam on July 19, 2017
- R-12(a) Dr. Epstein's report of exam on July 13, 2017
- R-12(b) Dr. Epstein's report of exam on August 1, 2017
- R-12(c) Dr. Epstein's report of exam on August 15, 2017
- R-12(d) Dr. Epstein's report of exam on September 7, 2017
- R-12(e) Dr. Epstein's report of September 26, 2017
- R-13(a) 2015 Calendar tracking Tretsis' job attendance time on authorized light duty, FMLA leave, authorized extended unpaid medical leave, etc.
- R-13(b) 2016 Calendar tracking Tretsis' job attendance time on authorized light duty, FMLA leave, authorized unpaid medical leave, etc.
- R-13(c) 2017 Calendar tracking Tretsis' job attendance, authorized unpaid medical leave, light duty, and related attendance matters
- R-14(a) & (b) Calendars for 2016 and 2017 tracking Tretsis' unpaid leave time
- R-15(a) Sheriff's Office 2015 Calendar for Tretsis
- R-15(b) Sheriff's Office 2016 Calendar for Tretsis
- R-15(c) Sheriff's Office 2017 Calendar for Tretsis
- R-16 County Infoshare Leave Search record for Tretsis for 2015, 2016 and 2017
- R-17(a) Preliminary Notice of Disciplinary Action, dated September 28, 2017
- R-17(b) Acknowledgement of Receipt of PNDA by Tretsis

- R-17(c) Notification of Tretsis of Investigation
- R-17(d) Loudermill Hearing memo
- R-17(e) Sheriff's Office receipt for receiving departmental ID/Access card from Tretsis
- R-17(f) Internal Affairs Investigation Report
- R-17(g) FCE #3 page 14
- R-17(h) Page 1 (with redaction) and Page 3 (with redaction) from Dr. Epstein's report of September 26, 2017 on Tretsis
- R-17(i) Letter dated September 28, 2017 to Tretsis from County's Workers' Compensation Administrator
- R-17(j) Memo dated June 27, 2017 from Sheriff to Tretsis regarding Employee Status Conference
- R-18(a) County record for Tretsis' residential address
- R-18(b) Final Notice of Disciplinary Action, dated November 14, 2017
- R-18(c) Photocopy of front of returned envelope sent by Sheriff's Office by certified mail, return receipt requested, to Tretsis with FNDA
- R-18(d) Photocopy of green return receipt card attached to back of returned envelope
- R-19 CV of Dr. Epstein
- R-19(a) Current CV of Dr. Epstein
- R-20 CV of Dr. Gallick
- R-21 Dr. Gallick's Supplemental Letter Report
- R-22 Amended FNDA dated March 2, 2018 (Amending Removal Date to November 14, 2017)
- R-23 Sheriff's Office Rule and Regulation 3:2.11