

case at hand, although the penalty was modified by the Commission, charges were sustained and major discipline was imposed. Consequently, as appellant has failed to meet the standard set forth at *N.J.A.C. 4A:2-2.12*, counsel fees must be denied.

This decision resolves the merits of the dispute between the parties concerning the disciplinary charges and the penalty imposed by the appointing authority. However, in light of the Appellate Division's decision, *Dolores Phillips v. Department of Corrections*, unpublished, Docket No. A-5581-01T2F (App. Div. Feb. 26, 2003), the Commission's decision will not become final until any outstanding issues concerning back pay are finally resolved.

ORDER

The Civil Service Commission finds that the action of the appointing authority in removing the appellant was not justified. The Commission therefore modified the removal to a 10 working day suspension. The appellant is entitled to back pay, benefits and seniority for the period following the 10 working day suspension until his actual reinstatement. The amount of back pay awarded is to be reduced and mitigated as provided for in *N.J.A.C. 4A:2-2.10*. Proof of income earned and an affidavit of mitigation shall be submitted by or on behalf of the appellant to the appointing authority within 30 days of issuance of this decision.

Counsel fees are denied pursuant to *N.J.A.C. 4A:2-2.12*.

The parties must inform the Commission, in writing, if there is any dispute as to back pay within 60 days of issuance of this decision. In the absence of such notice, the Commission will assume that all outstanding issues have been amicably resolved by the parties and this decision shall become a final administrative determination pursuant to *R. 2:2-3(a)(2)*. After such time, any further review of this matter shall be pursued in the Superior Court of New Jersey, Appellate Division.

DECISION RENDERED BY THE
CIVIL SERVICE COMMISSION ON
THE 20TH DAY OF JANUARY, 2021



Deirdre L. Webster Cobb
Chairperson
Civil Service Commission

Inquiries
and
Correspondence

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

attachment



State of New Jersey
OFFICE OF ADMINISTRATIVE LAW

INITIAL DECISION

OAL DKT. NO. CSV 03503-2019

AGENCY DKT. NO. 2019-2215

**IN THE MATTER OF ALMEEN JENKINS,
ANN KLEIN FORENSIC CENTER, DEPARTMENT
OF HUMAN SERVICES.**

Stuart J. Alterman, Esq., for Appellant, Almeen Jenkins (Alterman and Associates LLC, attorneys)

Alexis F. Fedorchak, Deputy Attorney General, for respondent, Ann Klein Forensic Center, Department of Human Services (Gurbir S. Grewal, Attorney General of New Jersey, attorney)

Record Closed: August 12, 2020

Decided: November 25, 2020

BEFORE SUSAN L. OLGATI, ALJ:

STATEMENT OF THE CASE

Appellant, Almeen Jenkins (Jenkins or appellant), appeals the disciplinary action of respondent, Ann Klein Forensic Center (AKFC), Department of Health, removing him from his position as a senior medical security officer, for conduct unbecoming a public employee, in violation of N.J.A.C. 4A:2-2.3(a)6; physical or mental abuse of a patient, client, resident, or employee, in violation of Administrative Order (A.O.) 4:08 C3; and

inappropriate physical contact or mistreatment of a patient, client, resident or employee (A.O.) 4:08 C5.

PROCEDURAL HISTORY

On or about February 28, 2018, respondent issued a Preliminary Notice of Disciplinary Action relating to appellant's actions on January 22, 2018. Appellant did not request a departmental hearing. Thereafter, on or about February 14, 2019, respondent issued a Final Notice of Disciplinary Action, removing appellant from employment effective February 28, 2018. Appellant timely filed an appeal with the Civil Service Commission, and the matter was transmitted to the Office of Administrative Law on March 13, 2019, for determination as a contested case. N.J.S.A. 52:14B-1 to-15 and N.J.S.A. 52:14F-1 to-13. The hearing was held on November 12, 2019, and February 20, 2020. The record remained open to allow the parties to request a transcript of the proceedings and submit written summations. Following receipt of written summations, the record closed on August 12, 2020. The deadline for issuing the Initial Decision was extended in accordance with the Governor's Executive Orders concerning the COVID-19 Pandemic.

FACTUAL DISCUSSION AND FINDINGS

Summary of Testimony

The following is a summary of the relevant and material testimony given at hearing.

For respondent:

Sandi Ferguson is the training director at AKFC and is a registered nurse. She has been employed at AKFC for thirty years. She is responsible for training all staff. She teaches therapeutic options and advanced emergency holds during annual training and at employee orientation. Employees are permitted only to use holds that are taught during training. Employees are trained on triggers that may escalate a patient's behavior.

Ferguson was familiar with Jenkins' training. His learning transcript reflects his most recent training on therapeutic options on December 13, 2017, and his most recent training on advanced emergency holds on December 14, 2017.

A.O. 4:08 defines physical abuse. Injury is not required for a finding of physical abuse. Employees are required to attempt to de-escalate a situation prior to using a "hands-on" approach.

If staff are a trigger for a patient they are trained to step back. Staff are not permitted to put a patient into a hold that takes the patient down to the floor. Staff are required to first take a step back to find out what the issue is. Then, if a hold is needed, staff must use an approved hold--an arm control restraint or a body control restraint.

Ferguson prepared a statement following her review of the surveillance video. According to Ferguson, H.A. appeared to take a step back after he spat on Jenkins. She concluded that Jenkins did not use any approved hold on H.A.

On cross-examination, Ferguson explained that she is certified in therapeutic options and advanced emergency holds. She lectures on these techniques using power point presentations. She teaches approximately twenty to thirty sessions a year. She teaches approximately twelve additional sessions during employee orientation. In the last five years, appellant received annual training in therapeutic options.

She testified that a proper body control hold involves holding a patient from the side and putting one's arms underneath the patient's diaphragm like a "bear hug." A staff member's head is tucked behind the patient. If the patient moves, the staff member is to hang onto the patient until help arrives and the patient can be put into an escort position.

Ferguson acknowledged that the patients at AKFC are the most difficult of psychiatric patients. She acknowledged that H.A. was a frequent patient at AKFC. He had many negative interactions with AKFC staff including medical security officers (MSO), nurses, and doctors. MSO's were often called to deal with H.A.

Upon review of the video, Ferguson agreed that the patient was aggressive towards Jenkins. She did not know if Jenkins attempted to speak to H.A. during the incident. Staff are trained to always try to verbally de-escalate a situation unless the threat of harm is imminent. She testified that it is not appropriate to grab a patient by the shoulders. If you grab a patient's upper body you should let go of the hold.

It is permissible for an MSO to direct a patient not to spit on them or to stop spitting, but Ferguson opined that she would "gently" direct the patient to do so. Ferguson acknowledged that not all holds taught in training work. She acknowledged that while MSO's are not permitted to take a patient down to the ground, it could happen if both parties fell.

Ferguson could not tell if H.A. was cooperating. She acknowledged that H.A.'s feet were angled towards Jenkins and that a perpendicular position is a good position for an approved hold. There were portions of the video where Ferguson could not tell what Jenkins was doing because his back was towards the camera and/or she could not see his arms. However, there was a point where Jenkins got back on top of H.A. and was straddling him. It was at that point that Jenkins should have gotten off of H.A. Remaining on top of a patient while he was on the floor presents a danger of affixation. It appeared that Jenkins may have had his body weight on H.A. His body was parallel to the floor, but Ferguson could not tell where Jenkins' hands were positioned.

Hector Figueroa is the director of medical security at AKFC. He has been employed by AKFC for twenty-six years. He testified that he took the photographs of H.A. following the January 22, 2018, incident. He also served on the incident review committee that reviewed this incident.

On cross-examination, Figueroa did not recall when he took the photographs of H.A. H.A. made an allegation of abuse and the investigator asked for photographs. He does not know how or when the scratches that appear on H.A.'s neck occurred.

He would have seen the outcome of the investigation. It was agreed by the incident review committee that discipline of Jenkins was warranted.

Stephanie Streletz, is a Department of Health supervisor of investigations. She testified generally regarding the investigation process. She played no role in the investigation of the incident and had no first-hand knowledge of the incident. She did not supervise the investigator who conducted the investigation.

For appellant:

Ronald McMullen is a senior MSO and the union president. He has served as the union president for approximately twenty years. During that time, he has been involved at the institutional level in every case involving removal. He has often successfully advocated for a negotiated resolution of these matters. McMullen believes that the discipline in this matter is overly harsh and recommends that appellant be retrained and returned to duty.

McMullen did not respond to the scene and had no first-hand knowledge of the incident, but he reviewed the surveillance video several times.

Frank Taylor appeared for hearing and testified pursuant to subpoena issued by appellant. He is employed at AKFC as a senior MSO and is a member of the proactive therapeutic team (PATT) and is a certified trainer in therapeutic options, advanced emergency holds, and emergency restraints. He has been a trainer for ten years and has worked at AKFC for twenty-three years. As a trainer, he is supervised by Sandi Ferguson. Therapeutic options training focuses on de-escalation skills. De-escalation doesn't always work in reality so there is training on appropriate holds to be used.

He did not witness the incident. Upon viewing the video, he testified that Jenkins did nothing wrong or inconsistent with his training. He did not abuse the patient or engage in inappropriate physical contact. After being spat on, Jenkins continued to walk to his assigned post. After H.A. took a defensive stance as he moved into the short hallway, Jenkins put H.A. in a side body hug. This was "a least restrictive hold" as Jenkins was about to pass H.A. Taylor believes that H.A. was being combative while Jenkins was trying to restrain him and they fell to the ground. Once they were on the ground, Jenkins

seemed to lose his advantage over H.A. so he repositioned himself and continued to hold him until help arrived.

Joseph Baldwin is a senior MSO at AKFC. He appeared for hearing and testified pursuant to a subpoena issued by appellant. On the date of the incident, he responded to the code that had been called. He helped to escort H.A. back to his room. H.A. was not cooperative during the escort. The officers had to talk with him and "tussle with him a bit." H.A. was still agitated when he got back to his room--he was talking about his religion. Baldwin was familiar with H.A. He could be very combative, agitated, and assaultive. Baldwin does not believe that Jenkins engaged in any inappropriate behavior towards H.A. Jenkins is a very good officer who is respected by the other officers. Baldwin did not witness any of the incident that occurred prior to the code being called.

Almeen Jenkins was a medical security officer at AKFC. He was employed there from 2007 until the date of his removal in 2018. He testified that on the date of the incident, he was escorting patients back from rehabilitation. H.A. had the Koran in his hand. H.A. turned around and said that he was going to attack Jenkins because Jenkins did not believe in Allah. Jenkins responded that he was going to walk past H.A. and that H.A. was going to go to his unit. H.A. spat in Jenkins' face and stepped back in a fighting motion. Jenkins did not know if H.A. was going to swing his book at him or do something else, so he restrained him in a side body hug. Jenkins was trying to stop the situation and H.A. was trying to hit him. As they continued down the hallway, H.A. tripped and Jenkins tripped on top of him. The code was called. Jenkins lost his balance when they fell to the ground. H.A. arms were loose. Jenkins regained his balance and put his arms back around H.A. to stop any assault from him. Once the other officers arrived, Jenkins got up and walked away.

Credibility

For testimony to be believed, it must not only come from the mouth of a credible witness, but it also has to be credible in itself. It must elicit evidence that is from such common experience 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 witness' story in light of its rationality or internal consistency and the manner in which it "hangs together" with the other evidence. Carbo v. United States, 314 F.2d 718, 749 (9th Cir. 1963). Also, "[t]he interest, motive, bias, or prejudice of a witness may affect his credibility and justify the [trier of fact], whose province it is to pass upon the credibility of an interested witness, in disbelieving his testimony." State v. Salimone, 19 N.J. Super. 600, 608 (App. Div.), certif. denied, 10 N.J. 316 (1952) (citation omitted).

A trier of fact may reject testimony because it is inherently incredible, or because it is inconsistent with other testimony or with common experience, or because it is overborne by other testimony. Congleton v. Pura-Tex Stone Corp., 53 N.J. Super. 282, 287 (App. Div. 1958).

As to the credibility of respondent's witnesses, I accept the testimony of Sandi Ferguson as credible. She is well qualified to make determinations regarding proper holds and proper de-escalation techniques. She candidly acknowledged that she did not know if Jenkins attempted to talk to H.A. to de-escalate the situation. She also acknowledged that holds taught in training do not always work in real-life situations. She further acknowledged that she could not determine if Jenkins' full body weight was on H.A. because she could not see the position of his hands. While credible, Ferguson's testimony and opinion appeared to be limited to reviewing the video without consideration of the other evidence in the record.

I also accept the testimony of Hector Figueroa as credible. However, as his role was limited to taking a photograph of H.A.'s claimed injuries and being on the incident review committee, his testimony is of limited value.

I similarly accept the testimony of Stephanie Streletz regarding the investigative process as credible, however as she played no role in this matter her testimony is of little relevance.

As to the credibility of appellant's witnesses, I accept the testimony of Ronald McMullen as credible. However, as he had no first-hand knowledge of the incident and,

as the union president, is responsible for advocating for his members, I recognize that his testimony is biased in favor of appellant and therefore give it limited weight.

I accept Frank Taylor's testimony regarding training on proper holds and his explanation of the differences between training scenarios and real-life situations to be reasonable and credible.

I accept the testimony of Joseph Baldwin regarding his observations upon responding to the code to be straightforward and credible.

Finally, I accept the testimony of appellant as credible. His testimony regarding H.A.'s threatened attack on him, based on what H.A. perceived to be his religious beliefs, was detailed and credible. Additionally, Jenkins' testimony regarding H.A. spitting on him was credible. Similarly, his testimony regarding his efforts to place H.A. in a side body hold was reasonable and believable. His testimony that he remained on top of H.A., after they fell to the floor, to regain his balance and continue to attempt to restrain him was also reasonable. His testimony that H.A. remained combative and/or agitated throughout the incident is consistent with the testimony of MSO Baldwin. Finally, Jenkins' testimony regarding the incident is largely consistent with the video.

Findings of Fact

After having an opportunity to consider the testimony, observe the demeanor of the witnesses and assess their credibility, as well as having considered the limited documentary evidence in the record¹, I **FIND** the following as **FACT**:

Jenkins was employed at AKFC as an MSO. He began his employment in 2007 and continued there until his disciplinary removal in 2018.

While employed as an SMO, Jenkins received training on therapeutic options on dates including: January 10, 2013; February 21, 2014; October 29, 2014; October 19,

¹ Due to the unavailability of the investigator who conducted the investigation, AKFC did not admit the investigation report into evidence.

2015; and December 13, 2017. He received training on advanced emergency holds on dates including: October 30, 2014, May 19, 2015; October 29, 2014; October 20, 2015; and December 14, 2017.

The surveillance video which was played at hearing at both regular and frame by frame speeds shows the following which I **FIND** as **FACT**:

Surveillance camera number 19 shows, at approximately 10:52:49 a.m., H.A. walking with others down a hallway. He is carrying an object appearing to be a folder in his hand. He turns around and faces Jenkins who is walking behind him. H.A. is walking backwards with his back to the camera. He lifts forward on his feet towards Jenkins and appears to spit at him. H.A. steps backwards. Jenkins advances towards H.A. and grabs him around the shoulder area as they exit through the doorway into another hallway.

Surveillance camera number 2 shows H.A. and Jenkins as they move through the doorway into another hallway. Jenkins has H.A. in a hold and they struggle as they move down the hallway. As they move towards the end of the hallway, they fall down with Jenkins on top of H.A. H.A.'s legs/knee are near Jenkins' crotch area. Jenkins moves off towards H.A.'s right side. He moves back on top of H.A. and straddles him. Approximately five MSO's arrive at the scene. An officer in a white shirt gets on top of H.A. Jenkins gets up and walks away at approximately 10:53:31 a.m.

The surveillance video has no sound.

Portions of the incident are not fully captured by the surveillance video because at times H.A. and Jenkins are not facing the camera.

The photo of H.A. was taken the day after the incident. It shows several small red marks on H.A.'s neck.

LEGAL ANALYSIS AND CONCLUSIONS

Appellant's rights and duties are governed by the Civil Service Act and accompanying regulations. A civil service employee who commits a wrongful act related to his or her employment, or provides other just cause, may be subject to major discipline. N.J.S.A. 11A:2-6 through 2-20; N.J.A.C. 4A:2-2.2, through 2.3. Major discipline includes removal, or fine, or suspension for more than five working days. N.J.A.C. 4A:2-2.2. Employees may be disciplined for insubordination, neglect of duty, conduct unbecoming a public employee, failure or inability to perform duties, and other sufficient cause, among other things. N.J.A.C. 4A:2-2.3.

The appointing authority has the burden of establishing the truth of the allegations by a preponderance of the credible evidence. Atkinson v. Parsekian, 37 N.J. 143, 149 (1962). Evidence is said to preponderate "if it establishes the reasonable probability of the fact." Jaeger v. Elizabethtown Consol. Gas Co., 124 N.J.L. 420, 423 (Sup. Ct. 1940) (citation omitted). The evidence must "be such as to lead a reasonably cautious mind to the given conclusion." Bornstein v. Metro. Bottling Co., 26 N.J. 263, 275 (1958); see also Loew v. Union Beach, 56 N.J. Super. 93, 104 (App. Div. 1959).

Conduct Unbecoming a Public Employee

The appellant is charged with "conduct unbecoming a public employee" in violation of N.J.A.C. 4A:2-2.3(a)(6). Conduct unbecoming a public employee is an elastic phrase that encompasses conduct that adversely affects the morale or efficiency of a governmental unit or that has a tendency to destroy public respect in the delivery of governmental services. Karins v. City of Atl. City, 152 N.J. 532, 554 (1998); see also In re Emmons, 63 N.J. Super. 136, 140 (App. Div. 1960). It is sufficient that the complained-of conduct and its attending circumstances "be such as to offend publicly accepted standards of decency." Karins, 152 N.J. at 555 (quoting In re Zeber, 156 A.2d 821, 825 (1959)). Such misconduct need not necessarily "be predicated upon the violation of any particular rule or regulation, but may be based merely upon the violation of the implicit standard of good behavior which devolves upon one who stands in the public eye as an upholder of that which is morally and legally correct." Hartmann v. Police Dep't of

Ridgewood, 258 N.J. Super. 32, 40 (App. Div. 1992) (quoting Asbury Park v. Dep't of Civil Serv., 17 N.J. 419, 429 (1955)).

Here, Jenkins' actions once he placed H.A. in a hold and attempted to subdue H.A. until other officers arrived, were reasonable and consistent with his training and his duties as an MSO. However, he did not first properly attempt to verbally or otherwise de-escalate the situation before he advanced towards H.A. and placed him in a hold. While these actions constitute a violation of AKFC training, they do not offend publicly accepted standards of decency or destroy public respect in the delivery of governmental services.

Accordingly, I **CONCLUDE** that respondent failed to meet its burden of proof as to this charge and that appellant's actions do not constitute conduct unbecoming a public employee in violation of N.J.A.C. 4A:2-2.3(a)(6).

Physical or Mental Abuse of a Patient

Administrative Order 4:08, defines physical abuse as:

A physical act directed at a patient ... of a type that could tend to cause pain, injury, anguish, and/or suffering. Such acts include, but are not limited to, the patient...being kicked, pinched, bitten, punched, slapped, hit, pushed, dragged, and/or struck with a thrown or held object.

Here, there is no evidence that at any point during the incident Jenkins attempted to kick, pinch, bite, punch, slap, hit, push, drag, or strike H.A. Rather, the credible evidence in the record including the surveillance video demonstrates that once Jenkins placed H.A. in a hold, he attempted to subdue H.A. until other officers arrived and were able to assist. The evidence further demonstrates that when Jenkins fell on H.A. he remained on top of him and readjusted his position on H.A until the other officers arrived and were able to take charge of the situation and secure H.A. Accordingly, I **CONCLUDE** that respondent failed to meet its burden of proof as to this charge and that appellant's actions do not constitute physical abuse of a patient in violation of A.O. 4:08, C3.

Inappropriate Physical Contact or Mistreatment of a Patient, Client, Resident, or Employee

The definition of inappropriate physical contact or mistreatment of a patient, client, resident, or employee is not defined in the Administrative Order but rather is determined on a case by case basis.

As noted above, Jenkins advanced towards H.A. and placed him in a hold without sufficiently attempting to de-escalate the situation. While his belief that H.A. had moved into an aggressive or fighting stance was reasonable, he did not first attempt to move away from H.A. or allow sufficient time for any attempted verbal de-escalation to be effective. Rather, within seconds of being spat at he moved towards H.A. and placed him in a hold. Jenkins' actions in grabbing H.A. and placing him in a hold had the potential of escalating the situation and causing harm to not only H.A. but to the other patients in the area. Jenkins failure to properly de-escalate the situation is contrary to AKFC training.

Accordingly, I **CONCLUDE** that respondent has met its burden of proof as to this charge and that appellant's actions constitute inappropriate physical contact in violation of A.O. 4:08, C5.

PENALTY

A civil service employee who commits a wrongful act related to his or her duties may be subject to major discipline. N.J.S.A. 11A:1-2(b), 11A:2-6, 11A:2-20; N.J.A.C. 4A:2-2.2, 2.3(a). This requires a de novo review of appellant's disciplinary action. In determining the appropriateness of a penalty, several factors must be considered, including the nature of the employee's offense, the concept of progressive discipline, and the employee's prior record. George v. N. Princeton Developmental Ctr., 96 N.J.A.R.2d (CSV) 463. Pursuant to West New York v. Bock, 38 N.J. 500, 523-24 (1962), concepts of progressive discipline involving penalties of increasing severity are used where appropriate. See also In re Parlo, 192 N.J. Super. 247 (App. Div. 1983).

Here, the only charge proven against appellant is inappropriate physical contact relating to his failure to sufficiently de-escalate the situation before resorting to the use of a "hands on" technique and placing H.A. in a hold. While violative of AKFC training, there are several factors that weigh in favor of mitigating the penalty to be imposed. As an initial matter, H.A. spat at appellant and made verbal threats to him. Based on H.A.'s action, as well as his reputation of being combative and aggressive and of having negative interactions with other MSO's, doctors, and nurses, Jenkins reasonably believed that H.A. was moving into a defensive posture. Additionally, appellant worked as an MSO for nearly twelve years and had no prior disciplinary history. Given the nature and circumstances surrounding this single violation, I **CONCLUDE** that the penalty of removal is excessive and inconsistent with the concept of progressive discipline and should be **REVERSED**. I further **CONCLUDE** that a ten-day suspension is more appropriate and proportionate to the offense.

ORDER

I hereby **ORDER** that the charge against the appellant of inappropriate physical contact is **SUSTAINED**. I further **ORDER** that the charges against appellant of conduct unbecoming a public employee and physical or mental abuse of a patient are **DIMISSED**. I **ORDER** that respondent's action removing appellant from his position of employment is **REVERSED** and that the penalty be **MODIFIED** to a ten-day suspension. I **ORDER** that appellant be reinstated to his position as an MSO and receive any and all appropriate retraining. Finally, I **ORDER**, that any applicable back pay and other benefits be issued to appellant.

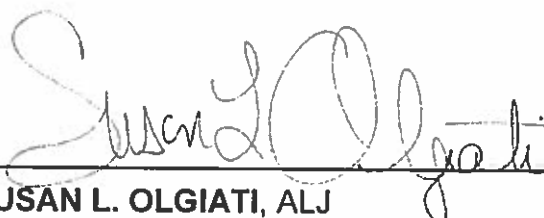
I hereby **FILE** my initial decision with the **CIVIL SERVICE COMMISSION** for consideration.

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, 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.

November 25, 2020

DATE


SUSAN L. OLGATI, ALJ

Date Received at Agency:

Date Mailed to Parties:

/vj

APPENDIX
Witnesses

For respondent:

Sandi Ferguson

Hector Figueroa

Stephanie Streletz

Ronald McMullen

For appellant:

Frank Taylor

Joseph Baldwin

Almeen Jenkins

Exhibits

For respondent:

R-1 PNDAs February 28, 2018, FNDA February 14, 2019

R-2 Administrative Order 4:08

R-3 Personal Defensive and Control Techniques in Aggressive Patient Situations and Emergencies Policy

R-4 Learning transcript

R-5 Video

R-6 Statement of Sandi Ferguson, February 28, 2018

R-7 Patient photo

For appellant

None
