



III. Upon information and belief, that the Guam Education Policy Board Member Chairman Francis Santos stated that Union President Matt Rector was removed from his position on the School Board because he was not a Union Member *See Attached Exhibit A*. Board Chairman Francis Santos has provided no documentation to show that Mr. Matt Rector is not a member of the Union nor that being a member of the union is a requirement under the law. This action was done days before Union negotiations and in bad faith.

IV. Removal of Members of The Board is governed by 17 G.C.A § 3102.5, which states in pertinent part:

**No member of the Board shall be removed from office before a written bill of particulars shall have been given to the accused and before an investigation and an open and public hearing shall have been had.**

The Board never served Matt Rector with a written Bill of Particulars. Nor to the best of GFT's knowledge did The Board ever conduct an investigation related to removing Matt Rector from The Board.

The Guam Education Policy Board Member Chairman Francis Santos is responsible for removing the President of the Union without just cause and on the "eve" of negotiations.

V. The Guam Education Policy Board member Chairman Francis Santos is required to bargain in Good Faith as required by 4 GCA Chapter 10, et al. ("Public Employee-Management Relations Act"), hereafter "PERMA" and as set forth in 2 Guam Administrative Rules (GAR) Section 5101 et seq. to allow recognized public employee organization to negotiate free from restraint and protracted negotiations.

**4 GCA Chapter 10.**

**A. § 10111. Unfair Labor Practices.**