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March 16, 2026

Stephanie D'Amico, PERC
Via Email Only

RE: Arancio/Middlesex EA
PERC Dkt. No.: CI-2026-018

Dear Ms. D'Amico,

Please accept this slightly tardy position statement on behalf of the Middlesex Education Association (MEA). If you want to ignore this submission, please feel free to do so. We have absolutely no problem defending the merits of this matter, if a Complaint should issue. However, you are aware that I was on vacation the week before last, and I have not yet been able to catch up.

As I understand the gravamen of Arancio's position, devoid of all of the ancient and largely erroneous history, it is that Carolyn Muglia, the then out-going President of the Respondent MEA, committed an Unfair Practice when she, on or about June 9, 2025, abolished the "MEA Action Team". As I understand it, the Charging Party does not challenge Muglia's authority as President to disband the Action Team, only her alleged motivation.

All of the faults in the Charging Party's position are evidenced in both the substance of her Charge, as well as the attachments to said Charge.

Let's start off with this undisputed proposition, and that is in addition to the undisputed fact that it was within of the authority of the President to disband said Action Team, the creation of an Action Team is to serve one purpose and one purpose only. During the course of collective negotiations for a successor CNA, said Team decides what, if any, actions (as the name of the teams specifically indicates) should the Association take, to put additional pressure on the Board to come up with a fair contract. Once an MOA has been signed, there is no reason for an Action Team. There is no need for same unless and until during the course of the next such negotiations, whoever the President of the MEA might be at that time, in that President's discretion, determines to create a new Action Team and then also determines who should constitute the membership, at that time. To support the above statement, all I need to do is quote, in full, Paragraph 27 of the Charge. It reads:

The June 9 email further stated that, "Effective immediately, the MEA Action Team is hereby disbanded for the remainder of the 2024-2025 school year. The next MEA Leadership Team will have the discretion to determine to reinstate the team, and, if so, to appoint members accordingly."

Further, again the Charge itself accurately sets forth the basis for Muglia's decision to disband the Action Team. Paragraph 33 reads:

On June 9, 2025, Muglia [stated] that CAT ["Crisis Action Team"] would be shut down because the CAT "platform" was used "to solicit support for Angela Arancio's Unfair Labor Practice against the Association."

Significantly, in terms of a proper disposition of this matter, the above two statements are both accurate and *true*. The Charging Party nowhere disputes that she was in fact doing precisely what Muglia stated at the time, and that in doing so, she was acting *ultra vires* of the very reason for an Action Team to exist.

Proof of Arancio's improper use of the Action Team's *raison d'être*, is clearly demonstrated by the Exhibits attached to the instant Charge. No reason exists to cite each one fully herein, as both are clear on their face. Members were being asked "to reach out to Angela"(the Charging Party herein), "as soon as possible" and supply her with alleged instances when the MEA did not allow members (including Arancio) to speak, accused members of dishonesty, or of unprofessional conduct, or made other inappropriate remarks during or after an Association meeting. (Ex. 1). These questions have absolutely nothing to do with the functions of the Action Team and have everything to do with Arancio's then filed Unfair Practice.

Further, Muglia made no attempt to hide the reasoning behind her decision to disband the Action Team. (Ex. 2) She was entirely both factually and legally correct, when she stated:

It has come to my attention that the MEA Action Team has been using its platform to solicit support for Angela Arancio's Unfair Labor Practice against the Association. This is an inappropriate use of the team's purpose and a serious breach of its intended role.

Effective immediately, the MEA Action Team is hereby suspended for the remainder of the 2024-2025 school year. The next MEA Leadership will have the discretion to determine whether to reinstate the team and, if so, to appoint its members accordingly.

It is thus the primary position of the MEA that the facts contained within the four-corners of Arancio's Charge do not come close to meeting the standard articulated in the PERC rules for issuance of a Complaint.

There is one other and additional flaw in the Charge filed by Arancio. Paragraph 35 of the Charge is patently false and it is undermined by the other paragraphs set forth above. The MEA *did not* base its decision to disband the CAT on anything that Arancio filed, nor on Arancio's colleagues' desire to support her. Rather, as her own Charge has already established, it was Arancio's inappropriate use of the CAT's platform, purporting to solicit support for her meritless and time-barred Charge, that prompted said action.

Finally, theoretically, what right does PERC have to direct that the MEA's new leadership, in terms of the MEA's By-Laws, create a discretionary Action Team and then direct who should be members at such a time. The parties are currently in contract and who knows what actions, if any, will need to be taken when the next round of collective negotiations commences.

Respectfully submitted,
Oxford Cohen, PC
Attorneys for the Middlesex Education Association



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