

Law Offices of Mark P. Much, P.C.

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February 12, 2022

Via email HIGoodman@rayneslaw.com and regular mail
Harold I. Goodman, Esquire
1845 Walnut Street
Suite 2000
Philadelphia, PA 19103-4567

**Re: Yeadon Borough Chief of Police Anthony R. Paparo
Notice of Presentation to Borough Council**

Dear Mr. Goodman,

I am writing to you in your capacity as Attorney for Yeadon Borough Chief of Police Anthony R. Paparo ("Chief Paparo").

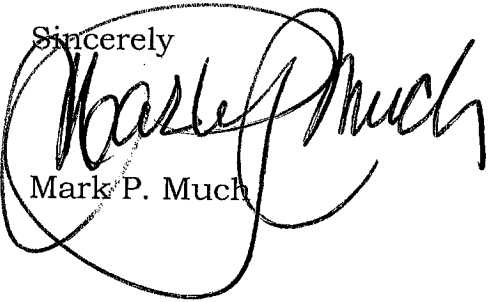
I am hereby providing notice that the Yeadon Borough Council intends to discuss and consider the performance deficiency identified below during its Legislative Meeting beginning at 7:00 pm on Thursday, February 17, 2022. During that meeting, Borough Council members will vote on whether the deficiency warrants the removal of Chief Paparo from the position of Chief of the Yeadon Borough Police Department.

The deficiency demonstrated by Chief Paparo arose out of his violation of the Police Collective Bargaining Agreement ("CBA") during 2019 and again during 2020. Chief Paparo's duties as the Chief of Police included the scheduling of full-time and part-time officers. Chief Paparo violated the terms of the CBA by scheduling part-time officers to work more hours than permitted under the CBA. Chief Paparo exceeded the total hours to be worked by part-time officers by six thousand two hundred (6,200) hours. This violation of the CBA resulted in the entry of a Consent Award that requires the Borough of Yeadon to pay three hundred eighty-seven thousand (\$387,000) dollars to the full-time Yeadon Borough Police Officers whose rights under the CBA had been violated by Chief Paparo.

Chief Paparo and his representative are hereby invited to appear at the Legislative Meeting on February 17 and to participate and take advantage of the opportunity to respond to the above allegation and to explain Chief Paparo's role in the events that led to the entry of the consent award.

Please contact me if you have any questions or concerns.

Sincerely

A handwritten signature in black ink, appearing to read "Mark P. Much". The signature is written in a cursive style with large, sweeping loops. It is positioned over the printed name "Mark P. Much" and the word "Sincerely".

Mark P. Much

MPM:gel

Cc Via Email

Mayor Rohan Hepkins

Isaac Dotson

Sharon Council Harris

Nicole Beaty

Carlette Brooks

Learin Johnson

Taliah Jones-Waters

Liana Roadcloud

Latoya Monroe