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BEFORE THE HAWAII STATE ETHICS COMMISSION
STATE OF HAWAII

HAWAII STATE ETHICS COMMISSION,) Charge No. 13-Cg-3
)
)
Complainant,)
)
) CHARGE
vs.)
)
KURUMI KAAPANA-AKI)
)
)
Respondent.)
)

CHARGE

Under the authority of and pursuant to sections 84-31(a) and 84-31(b), Hawaii Revised Statutes ("HRS"), and section 21-5-2, Hawaii Administrative Rules, the Hawaii State Ethics Commission ("Commission") issues this Charge against Kurumi Kaapana-Aki ("Respondent") based on the following:

GENERAL ALLEGATIONS

The State Ethics Code and The State Ethics Commission

1. The people of Hawaii believe that state employees must exhibit the highest standards of ethical conduct. To this end, the Hawaii State Constitution mandates that the legislature adopt a code of ethics applicable to all state employees. Haw. Const. Art. XIV.

2. In accordance with and pursuant to the constitutional mandate, the State Ethics Code, chapter 84, HRS, establishes standards of conduct that the legislature deemed necessary to preserve the public's confidence in state employees and creates the State Ethics Commission with the power to administer and enforce those standards. Preamble, chapter 84, HRS, and section 84-31, HRS.

3. All state employees, with the exception of judges and justices, are subject to and must comply with the State Ethics Code.

Myron B. Thompson Academy, Respondent and Diana Oshiro

4. Myron B. Thompson Academy ("MBTA") is a public charter school, organized pursuant to chapter 302B, HRS (repealed L. 2012).

5. At all times relevant herein, MBTA was located at 629 Pohukaina Street, Honolulu, Hawaii ("Pohukaina Street Location").

6. MBTA receives the majority of its funding from the State through an allotment based on the number of students enrolled in the school.

7. At all times relevant herein, MBTA's hours of operation on school days, i.e., MBTA instructional days and teacher institute days, were 8:00 a.m. to 4:00 p.m. ("school hours").

8. MBTA is a "state agency," as defined in the State Ethics Code.

9. At all times relevant herein, Respondent was the Vice Principal (aka Chief Operating Officer) for MBTA's elementary division.

10. At all times relevant herein, Respondent was an "employee" as defined by the State Ethics Code and was subject to the provisions contained therein.

11. At all times relevant herein, Respondent was also employed by Hawaiian Airlines ("HAL") as a flight attendant.

12. At all times relevant herein, Diana Oshiro ("Oshiro") was the Principal (aka Chief Executive Officer) of MBTA.

13. Respondent and Oshiro are sisters.

MBTA Policies and Procedures

14. Oshiro, as the Principal, was responsible for the general operations and management of MBTA.

15. Oshiro's responsibilities included, among other

things, granting, approving and/or authorizing sick leave, personal leave, vacation leave, compensatory time, and any other excused leave for all MBTA employees, including Respondent.

16. At all times relevant herein, Respondent was supervised by Oshiro.

17. Respondent, generally, was responsible for providing oversight and administrative leadership for MBTA's elementary division, including: (i) planning, managing, and supervising the school's operations and instructional program; (ii) supporting teachers in classroom management, discipline, safety, and curriculum; (iii) attending regular staff meetings, weekly "Leadership" meetings with other school administrators, and local school board meetings; and (iv) providing direction to a variety of faculty, staff and student programs and services.

18. From July 1, 2006, through June 30, 2012, MBTA and Respondent entered into a series of annual contracts, each entitled "Temporary Contract Employee" agreement ("TCE agreement"), under which Respondent was paid \$35,000 per TCE agreement.

19. The amount paid by MBTA to Respondent under the TCE agreements was in addition to her salary as the Vice Principal.

20. The TCE agreements, generally, were for the same services that Respondent was required to perform as part of her duties and responsibilities as the Vice Principal.

21. More specifically, the TCE agreements executed by MBTA and Respondent from July 1, 2007 through June 30, 2012, described the services to be performed as follows: "The Contract Employee will provide administrative leadership for the elementary division of MBTA and coordinate all curricular and instructional services required therein."

22. In each TCE agreement, Respondent expressly agreed to and was contractually required to perform the services described therein throughout the contract term, i.e., the 12 month period beginning July 1 and ending June 30 of the following year.

23. Because Respondent agreed to and was required to perform the services under the TCE agreements for the 12 month term of the contracts, Respondent was not eligible or otherwise entitled to earn compensatory time or other credit for school-related work that she performed during periods when the school was not in session, such as winter, spring and summer breaks.

Hawaiian Airlines Policies and Procedures

24. At all times relevant herein, HAL required its flight attendants to report to work for domestic (non-interisland) and international flights departing Honolulu no less than 75 minutes (1.25 hours) before the flight's scheduled departure time.

25. For flights departing Honolulu on which she worked, Respondent, on school days, left MBTA's Pohukaina Street Location at least 30 minutes before she was required to report to work for the flight, i.e., she left MBTA at least 105 minutes (1.75 hours) before the scheduled departure time.

26. At all times relevant herein, HAL required its flight attendants to remain on-duty following a domestic (non-interisland) flight's arrival in Honolulu for 15 minutes.

27. At all times relevant herein, HAL required its flight attendants to remain on-duty following an international flight's arrival in Honolulu for 30 minutes.

28. For flights arriving in Honolulu on which she worked, Respondent reported to work at MBTA on school days no sooner than 45 to 60 minutes (0.75 to 1.0 hours) after the flight's arrival time.

29. HAL's policy governing employees' non-revenue travel privileges prohibits employees from travelling as a non-revenue passenger for private business purposes.

30. At all times relevant herein, Respondent's absences during school hours when travelling interisland on HAL as a non-revenue passenger were for personal travel and not for MBTA-related business.

31. For interisland travel, HAL policy required passengers to check in and be issued a boarding pass at least 30 minutes

prior to the flight's scheduled departure time.

32. For interisland travel from Honolulu on a school day, Respondent left MBTA's Pohukaina Street Location at least 45 minutes before the flight's departure time.

33. For interisland travel to Honolulu on a school day, Respondent reported to work at MBTA no sooner than 15 minutes after the flight's arrival time.

Fair Treatment, HRS sections 84-13 and 84-13(3)

34. The Fair Treatment provision of the State Ethics Code is intended to prevent a state employee from misusing her state position to benefit herself or others.

35. More specifically, the Fair Treatment law does not allow an employee to use or attempt to use her official position "to secure or grant unwarranted privileges, exemptions, advantages, contracts, or treatment, for oneself or others[.]" HRS section 84-13. Further, the Fair Treatment law prohibits an employee from "using state time, equipment or other facilities for private business purposes." HRS section 84-13(3).

36. Respondent was absent from MBTA during school hours on numerous occasions, as detailed below, because of her work as a HAL flight attendant and other HAL-related travel.

37. Respondent did not account for those absences during school hours as sick leave, personal leave, or vacation leave.

38. Respondent's salary and employment benefits that she received from MBTA were not reduced or otherwise affected by her absences during school hours because of her work as a HAL flight attendant and other HAL-related personal travel.

39. For those days Respondent was absent during school hours because of her work as a HAL flight attendant, Respondent also received income from HAL.

40. Respondent misused her position, as a Vice Principal, to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

A. SCHOOL YEAR 2006-2007 ABSENCES (Counts 1-15)

COUNT 1

41. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

42. On Tuesday, March 6, 2007, as a non-revenue passenger, Respondent flew HAL flight 123 from Honolulu to Lihue, which departed at 7:50 a.m.

43. On Tuesday, March 6, 2007, Respondent returned to Honolulu as a non-revenue passenger on HAL flight 172, which arrived at approximately 3:05 p.m.

44. Tuesday, March 6, 2007, was a school day.

45. Respondent was absent for almost all of the school hours on March 6, 2007.

46. In light of HAL's policy governing employees' non-revenue travel privileges, Respondent's absence was for personal travel and not for MBTA-related business.

47. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 2

48. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

49. On Sunday, March 11, 2007, in her capacity as a HAL flight attendant, Respondent worked HAL flight 4 from Honolulu to Los Angeles, California.

50. On Monday, March 12, 2007, Respondent returned to Honolulu, working HAL flight 9, which arrived at 8:23 p.m.

51. Monday, March 12, 2007, was a school day.

52. Respondent was absent during all of the school hours on Monday, March 12, 2007.

53. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for

herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 3

54. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

55. On Wednesday, March 14, 2007, in her capacity as a HAL flight attendant, Respondent worked HAL flight 939 from Anchorage, Alaska, to Honolulu, which arrived at 12:22 p.m.

56. Wednesday, March 14, 2007, was a school day.

57. Respondent was absent for more than one-half of the school hours on March 14, 2007.

58. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 4

59. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

60. On Monday, April 2, 2007, in her capacity as a HAL flight attendant, Respondent worked HAL flight 4 from Honolulu

to Los Angeles, California.

61. On Tuesday, April 3, 2007, Respondent returned to Honolulu, working HAL flight 9, which arrived at 8:34 p.m.

62. Tuesday, April 3, 2007, was a school day.

63. Respondent was absent during all of the school hours on Tuesday, April 3, 2007.

64. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 5

65. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

66. On Wednesday, April 11, 2007, in her capacity as a HAL flight attendant, Respondent worked HAL flight 4 from Honolulu to Los Angeles, California.

67. On Thursday, April 12, 2007, Respondent returned to Honolulu, working HAL flight 9, which arrived at 8:32 p.m.

68. Thursday, April 12, 2007, was a school day.

69. Respondent was absent during all of the school hours on Thursday, April 12, 2007.

70. Respondent violated sections 84-13 and/or 84-13(3),

HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 6

71. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

72. On Wednesday, April 18, 2007, in her capacity as a HAL flight attendant, Respondent worked HAL flight 4 from Honolulu to Los Angeles, California.

73. On Thursday, April 19, 2007, Respondent returned to Honolulu, working HAL flight 9, which arrived at 8:54 p.m.

74. Thursday, April 19, 2007, was a school day.

75. Respondent was absent during all of the school hours on Thursday, April 19, 2007.

76. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 7

77. The allegations contained in paragraphs 1 through 40

herein are repeated and realleged.

78. On Monday, May 7, 2007, in her capacity as a HAL flight attendant, Respondent worked HAL flight 4 from Honolulu to Los Angeles, California.

79. On Tuesday, May 8, 2007, Respondent returned to Honolulu, working HAL flight 9, which arrived at 8:54 p.m.

80. Tuesday, May 8, 2007, was a school day.

81. Respondent was absent during all of the school hours on Tuesday, May 8, 2007.

82. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 8

83. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

84. On Monday, May 14, 2007, in her capacity as a HAL flight attendant, Respondent worked HAL flight 4 from Honolulu to Los Angeles, California.

85. On Tuesday, May 15, 2007, Respondent returned to Honolulu, working HAL flight 9, which arrived at 8:36 p.m.

86. Tuesday, May 15, 2007, was a school day.

87. Respondent was absent during all of the school hours on Tuesday, May 15, 2007.

88. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 9

89. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

90. On Friday, May 18, 2007, as a non-revenue passenger, Respondent flew HAL flight 173 from Honolulu to Lihue, which departed at 1:03 p.m.

91. Friday, May 18, 2007, was a school day.

92. Respondent was absent for two or more school hours on May 18, 2007.

93. In light of HAL's policy governing employees' non-revenue travel privileges, Respondent's absence was for personal travel and not for MBTA-related business.

94. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or

otherwise be absent during school hours without accounting for those absences.

COUNT 10

95. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

96. On Monday, May 21, 2007, as a non-revenue passenger, Respondent flew HAL flight 344 from Lihue to Honolulu, which arrived at approximately 2:05 p.m.

97. Monday, May 21, 2007, was a school day.

98. Respondent was absent for more than one-half of the school hours on May 21, 2007.

99. In light of HAL's policy governing employees' non-revenue travel privileges, Respondent's absence was for personal travel and not for MBTA-related business.

100. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 11

101. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

102. On Monday, May 21, 2007, in her capacity as a HAL

flight attendant, Respondent worked HAL flight 4 from Honolulu to Los Angeles, California.

103. On Tuesday, May 22, 2007, Respondent returned to Honolulu, working HAL flight 9, which arrived at 8:18 p.m.

104. Tuesday, May 22, 2007, was a school day.

105. Respondent was absent during all of the school hours on Tuesday, May 22, 2007.

106. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 12

107. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

108. On Monday, May 28, 2007, in her capacity as a HAL flight attendant, Respondent worked HAL flight 4 from Honolulu to Los Angeles, California.

109. On Tuesday, May 29, 2007, Respondent returned to Honolulu, working HAL flight 9, which arrived at 8:54 p.m.

110. Tuesday, May 29, 2007, was a school day.

111. Respondent was absent during all of the school hours on Tuesday, May 29, 2007.

112. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 13

113. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

114. On Monday, June 4, 2007, in her capacity as a HAL flight attendant, Respondent worked HAL flight 4 from Honolulu to Los Angeles, California.

115. On Tuesday, June 5, 2007, Respondent returned to Honolulu, working HAL flight 9, which arrived at 8:40 p.m.

116. Tuesday, June 5, 2007, was a school day.

117. Respondent was absent during all of the school hours on Tuesday, June 5, 2007.

118. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 14

119. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

120. On Thursday, June 7, 2007, as a non-revenue passenger, Respondent flew HAL flight 126 from Honolulu to Kahului, which departed at 11:00 a.m.

121. Thursday, June 7, 2007, was a school day.

122. Respondent was absent for more than one-half of the school hours on June 7, 2007.

123. In light of HAL's policy governing employees' non-revenue travel privileges, Respondent's absence was for personal travel and not for MBTA-related business.

124. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 15

125. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

126. On Thursday, June 7, 2007, as a non-revenue passenger, Respondent flew HAL flight 126 from Honolulu to Kahului, and HAL flight 180 from Kahului to Kona.

127. On Friday, June 8, 2007, as a non-revenue passenger, Respondent flew HAL flight 159 from Kona to Honolulu, which arrived at approximately 4:22 p.m.

128. Friday, June 8, 2007, was a school day.

129. Respondent was absent during all of the school hours on Friday, June 8, 2007.

130. In light of HAL's policy governing employees' non-revenue travel privileges, Respondent's absence was for personal travel and not for MBTA-related business.

131. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

B. SCHOOL YEAR 2007-2008 ABSENCES (Counts 16-43)

COUNT 16

132. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

133. On Wednesday, August 15, 2007, in her capacity as a HAL flight attendant, Respondent worked HAL flight 1465 from Honolulu to Pago Pago, American Samoa, which departed at 8:05 a.m.

134. On Wednesday, August 15, 2007, Respondent returned to

Honolulu, working HAL flight 1466, which arrived at 8:34 p.m.

135. Wednesday, August 15, 2007, was a school day.

136. Respondent was absent during all of the school hours on Wednesday, August 15, 2007.

137. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 17

138. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

139. On Wednesday, September 5, 2007, in her capacity as a HAL flight attendant, Respondent worked HAL flight 22 from Honolulu to Seattle, Washington, which departed at 1:40 p.m.

140. Wednesday, September 5, 2007, was a school day.

141. Respondent was absent for more than one-half of the school hours on September 5, 2007.

142. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for

those absences.

COUNT 18

143. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

144. On Thursday, September 6, 2007, in her capacity as a HAL flight attendant, Respondent worked HAL flight 21 from Seattle, Washington, to Honolulu, which arrived at 11:56 a.m.

145. Thursday, September 6, 2007, was a school day.

146. Respondent was absent for more than one-half of the school hours on September 6, 2007.

147. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 19

148. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

149. On Wednesday, September 26, 2007, in her capacity as a HAL flight attendant, Respondent worked HAL flight 22 from Honolulu to Seattle, Washington, which departed at 1:22 p.m.

150. Wednesday, September 26, 2007, was a school day.

151. Respondent was absent for more than one-half of the

school hours on September 26, 2007.

152. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 20

153. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

154. On Thursday, September 27, 2007, in her capacity as a HAL flight attendant, Respondent worked HAL flight 21 from Seattle, Washington, to Honolulu, which arrived at 12:28 p.m.

155. On Thursday, September 27, 2007, as a non-revenue passenger, Respondent flew HAL flight 260 from Honolulu to Hilo, which departed at 2:38 p.m.

156. On Thursday, September 27, 2007, as a non-revenue passenger, Respondent flew HAL flight 261 from Hilo to Honolulu, which arrived at approximately 6:30 p.m.

157. Thursday, September 27, 2007, was a school day.

158. In light of HAL's policy governing employees' non-revenue travel privileges, Respondent's absence was for personal travel and not for MBTA-related business.

159. Respondent was absent during all of the school hours

on Thursday, September 27, 2007.

160. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 21

161. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

162. On Wednesday, October 10, 2007, in her capacity as a HAL flight attendant, Respondent worked HAL flight 22 from Honolulu to Seattle, Washington, which departed at 1:22 p.m.

163. Wednesday, October 10, 2007, was a school day.

164. Respondent was absent for more than one-half of the school hours on October 10, 2007.

165. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 22

166. The allegations contained in paragraphs 1 through 40

herein are repeated and realleged.

167. On Thursday, October 11, 2007, in her capacity as a HAL flight attendant, Respondent worked HAL flight 21 from Seattle, Washington, to Honolulu, which arrived at 12:03 p.m.

168. Thursday, October 11, 2007, was a school day.

169. Respondent was absent for more than one-half of the school hours on October 11, 2007.

170. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 23

171. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

172. On Wednesday, October 17, 2007, in her capacity as a HAL flight attendant, Respondent worked HAL flight 22 from Honolulu to Seattle, Washington, which departed at 1:20 p.m.

173. Wednesday, October 17, 2007, was a school day.

174. Respondent was absent for more than one-half of the school hours on October 17, 2007.

175. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for

herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 24

176. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

177. On Thursday, October 18, 2007, in her capacity as a HAL flight attendant, Respondent worked HAL flight 21 from Seattle, Washington, to Honolulu, which arrived at 12:49 p.m.

178. Thursday, October 18, 2007, was a school day.

179. Respondent was absent for more than one-half of the school hours on October 18, 2007.

180. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 25

181. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

182. On Friday, November 2, 2007, as a non-revenue passenger, Respondent flew HAL flight 348 from Honolulu to Kona,

which departed at 1:44 p.m.

183. Friday, November 2, 2007, was a school day.

184. Respondent was absent for two or more school hours on November 2, 2007.

185. In light of HAL's policy governing employees' non-revenue travel privileges, Respondent's absence was for personal travel and not for MBTA-related business.

186. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 26

187. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

188. On Thursday, November 8, 2007, in her capacity as a HAL flight attendant, Respondent worked HAL flight 22 from Honolulu to Seattle, Washington, which departed at 2:36 p.m.

189. Thursday, November 8, 2007, was a school day.

190. Respondent was absent for two or more school hours on November 8, 2007.

191. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for

herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 27

192. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

193. On Friday, November 9, 2007, in her capacity as a HAL flight attendant, Respondent worked HAL flight 21 from Seattle, Washington, to Honolulu, which arrived at 12:55 p.m.

194. Friday, November 9, 2007, was a school day.

195. Respondent was absent for more than one-half of the school hours on November 9, 2007.

196. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 28

197. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

198. On Wednesday, December 19, 2007, as a non-revenue passenger, Respondent flew HAL flight 4 from Honolulu to Los

Angeles, California, which departed at 10:45 p.m.

199. On Monday, December 24, 2007, Respondent returned to Honolulu as a non-revenue passenger on HAL flight 1.

200. Thursday, December 20, 2007, was a school day.

201. Respondent was absent during all of the school hours on Thursday, December 20, 2007.

202. In light of HAL's policy governing employees' non-revenue travel privileges, Respondent's absence was for personal travel and not for MBTA-related business.

203. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 29

204. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

205. On Wednesday, January 23, 2008, in her capacity as a HAL flight attendant, Respondent worked HAL flight 22 from Honolulu to Seattle, Washington, which departed at 2:55 p.m.

206. Wednesday, January 23, 2008, was a school day.

207. Respondent was absent for two or more school hours on January 23, 2008.

208. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 30

209. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

210. On Thursday, January 24, 2008, in her capacity as a HAL flight attendant, Respondent worked HAL flight 21 from Seattle, Washington, to Honolulu, which arrived at 12:40 p.m.

211. Thursday, January 24, 2008, was a school day.

212. Respondent was absent for more than one-half of the school hours on January 24, 2008.

213. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 31

214. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

215. On Wednesday, January 30, 2008, in her capacity as a HAL flight attendant, Respondent worked HAL flight 22 from Honolulu to Seattle, Washington, which departed at 2:35 p.m.

216. Wednesday, January 30, 2008, was a school day.

217. Respondent was absent for two or more school hours on January 30, 2008.

218. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 32

219. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

220. On Thursday, January 31, 2008, in her capacity as a HAL flight attendant, Respondent worked HAL flight 21 from Seattle, Washington, to Honolulu, which arrived at 12:47 p.m.

221. Thursday, January 31, 2008, was a school day.

222. Respondent was absent for more than one-half of the school hours on January 31, 2008.

223. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and

treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 33

224. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

225. On Wednesday, February 6, 2008, in her capacity as a HAL flight attendant, Respondent worked HAL flight 4 from Honolulu to Los Angeles, California.

226. On Thursday, February 7, 2008, Respondent returned to Honolulu, working HAL flight 9, which arrived at 11:17 p.m.

227. Thursday, February 7, 2008, was a school day.

228. Respondent was absent during all of the school hours on Thursday, February 7, 2008.

229. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 34

230. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

231. On Monday, February 25, 2008, in her capacity as a HAL

flight attendant, Respondent worked HAL flight 4 from Honolulu to Los Angeles, California.

232. On Tuesday, February 26, 2008, Respondent returned to Honolulu, working HAL flight 9, which arrived at 8:40 p.m.

233. Tuesday, February 26, 2008, was a school day.

234. Respondent was absent during all of the school hours on Tuesday, February 26, 2008.

235. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 35

236. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

237. On Wednesday, March 12, 2008, in her capacity as a HAL flight attendant, Respondent worked HAL flight 22 from Honolulu to Seattle, Washington, which departed at 1:35 p.m.

238. Wednesday, March 12, 2008, was a school day.

239. Respondent was absent for more than one-half of the school hours on March 12, 2008.

240. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for

herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 36

241. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

242. On Thursday, March 13, 2008, in her capacity as a HAL flight attendant, Respondent worked HAL flight 21 from Seattle, Washington, to Honolulu, which arrived at 12:39 p.m.

243. Thursday, March 13, 2008, was a school day.

244. Respondent was absent for more than one-half of the school hours on March 13, 2008.

245. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 37

246. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

247. On Wednesday, April 16, 2008, in her capacity as a HAL flight attendant, Respondent worked HAL flight 22 from Honolulu

to Seattle, Washington, which departed at 1:38 p.m.

248. Wednesday, April 16, 2008, was a school day.

249. Respondent was absent for more than one-half of the school hours on April 16, 2008.

250. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 38

251. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

252. On Thursday, April 17, 2008, in her capacity as a HAL flight attendant, Respondent worked HAL flight 21 from Seattle, Washington, to Honolulu, which arrived at 12:09 p.m.

253. Thursday, April 17, 2008, was a school day.

254. Respondent was absent for more than one-half of the school hours on April 17, 2008.

255. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for

those absences.

COUNT 39

256. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

257. On Wednesday, April 30, 2008, in her capacity as a HAL flight attendant, Respondent worked HAL flight 22 from Honolulu to Seattle, Washington, which departed at 2:18 p.m.

258. Wednesday, April 30, 2008, was a school day.

259. Respondent was absent for two or more school hours April 30, 2008.

260. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 40

261. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

262. On Thursday, May 1, 2008, in her capacity as a HAL flight attendant, Respondent worked HAL flight 21 from Seattle, Washington, to Honolulu, which arrived at 12:03 p.m.

263. Thursday, May 1, 2008, was a school day.

264. Respondent was absent for more than one-half of the

school hours on May 1, 2008.

265. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 41

266. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

267. On Thursday, May 29, 2008, as a non-revenue passenger, Respondent flew HAL flight 1108 from Honolulu to Kona, which departed Honolulu at 5:50 a.m.

268. On Thursday, May 29, 2008, Respondent returned to Honolulu as a non-revenue passenger on HAL flight 363, which arrived at approximately 8:30 p.m.

269. Thursday, May 29, 2008, was a school day.

270. Respondent was absent during all of the school hours on Thursday, May 29, 2008.

271. In light of HAL's policy governing employees' non-revenue travel privileges, Respondent's absence was for personal travel and not for MBTA-related business.

272. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for

herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 42

273. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

274. On Sunday, June 1, 2008, in her capacity as a HAL flight attendant, Respondent worked HAL flight 455 from Honolulu to Manila, the Philippines.

275. On Tuesday, June 3, 2008, Respondent returned to Honolulu, working HAL flight 456, which arrived at 11:40 a.m.

276. Monday, June 2, 2008, was a school day.

277. Respondent was absent during all of the school hours on Monday, June 2, 2008.

278. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 43

279. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

280. On Tuesday, June 3, 2008, in her capacity as a HAL flight attendant, Respondent worked HAL flight 456 from Manila, the Philippines, to Honolulu, which arrived at 11:40 a.m.

281. Tuesday, June 3, 2008, was a school day.

282. Respondent was absent for more than one-half of the school hours on June 3, 2008.

283. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

C. SCHOOL YEAR 2008-2009 ABSENCES (Counts 44-93)

COUNT 44

284. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

285. On Sunday, August 3, 2008, in her capacity as a HAL flight attendant, Respondent worked HAL flight 455 from Honolulu to Manila, the Philippines.

286. On Tuesday, August 5, 2008, Respondent returned to Honolulu, working HAL flight 456, which arrived at 11:39 a.m.

287. Monday, August 4, 2008, was a school day.

288. Respondent was absent during all of the school hours on Monday, August 4, 2008.

289. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 45

290. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

291. On Tuesday, August 5, 2008, in her capacity as a HAL flight attendant, Respondent worked HAL flight 456 from Manila, the Philippines, to Honolulu, which arrived at 11:39 a.m.

292. Tuesday, August 5, 2008, was a school day.

293. Respondent was absent for more than one-half of the school hours on August 5, 2008.

294. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 46

295. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

296. On Wednesday, September 10, 2008, in her capacity as a HAL flight attendant, Respondent worked HAL flight 12 from Honolulu to San Francisco, California, which departed at 1:19 p.m.

297. Wednesday, September 10, 2008, was a school day.

298. Respondent was absent for more than one-half of the school hours on September 10, 2008.

299. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 47

300. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

301. On Thursday, September 11, 2008, in her capacity as a HAL flight attendant, Respondent worked HAL flight 11 from San Francisco, California, to Honolulu, which arrived at 11:21 a.m.

302. Thursday, September 11, 2008, was a school day.

303. Respondent was absent for more than one-half of the school hours on September 11, 2008.

304. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for

herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 48

305. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

306. On Wednesday, September 17, 2008, in her capacity as a HAL flight attendant, Respondent worked HAL flight 16 from Honolulu to San Diego, California, which departed at 1:41 p.m.

307. Wednesday, September 17, 2008, was a school day.

308. Respondent was absent for more than one-half of the school hours on September 17, 2008.

309. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 49

310. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

311. On Thursday, September 18, 2008, in her capacity as a HAL flight attendant, Respondent worked HAL flight 15 from San

Diego, California, to Honolulu, which arrived at 1:17 p.m.

312. Thursday, September 18, 2008, was a school day.

313. Respondent was absent for more than one-half of the school hours on September 18, 2008.

314. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 50

315. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

316. On Sunday, September 21, 2008, in her capacity as a HAL flight attendant, Respondent worked HAL flight 8 from Honolulu to Las Vegas, Nevada.

317. On Tuesday, September 23, 2008, Respondent returned to Honolulu, working HAL flight 17, which arrived at 5:12 a.m.

318. Monday, September 22, 2008, was a school day.

319. Respondent was absent during all of the school hours on Monday, September 22, 2008.

320. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and

treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 51

321. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

322. On Wednesday, September 24, 2008, in her capacity as a HAL flight attendant, Respondent worked HAL flight 16 from Honolulu to San Diego, California, which departed at 1:37 p.m.

323. Wednesday, September 24, 2008, was a school day.

324. Respondent was absent for more than one-half of the school hours on September 24, 2008.

325. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 52

326. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

327. On Thursday, September 25, 2008, in her capacity as a HAL flight attendant, Respondent worked HAL flight 15 from San Diego, California, to Honolulu, which arrived at 1:27 p.m.

328. Thursday, September 25, 2008, was a school day.

329. Respondent was absent for more than one-half of the school hours on September 25, 2008.

330. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 53

331. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

332. On Wednesday, October 15, 2008, in her capacity as a HAL flight attendant, Respondent worked HAL flight 12 from Honolulu to San Francisco, California, which departed at 1:34 p.m.

333. Wednesday, October 15, 2008, was a school day.

334. Respondent was absent for more than one-half of the school hours on October 15, 2008.

335. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for

those absences.

COUNT 54

336. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

337. On Thursday, October 16, 2008, in her capacity as a HAL flight attendant, Respondent worked HAL flight 11 from San Francisco, California, to Honolulu, which arrived at 11:49 a.m.

338. Thursday, October 16, 2008, was a school day.

339. Respondent was absent for more than one-half of the school hours on October 16, 2008.

340. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 55

341. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

342. On Wednesday, October 22, 2008, in her capacity as a HAL flight attendant, Respondent worked HAL flight 18 from Honolulu to Las Vegas, Nevada, which departed at 3:05 p.m.

343. Wednesday, October 22, 2008, was a school day.

344. Respondent was absent for two or more school hours on

October 22, 2008.

345. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 56

346. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

347. On Thursday, October 23, 2008, in her capacity as a HAL flight attendant, Respondent worked HAL flight 7 from Las Vegas, Nevada, to Honolulu, which arrived at 1:39 p.m.

348. Thursday, October 23, 2008, was a school day.

349. Respondent was absent for more than one-half of the school hours on October 23, 2008.

350. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 57

351. The allegations contained in paragraphs 1 through 40

herein are repeated and realleged.

352. On Monday, November 10, 2008, in her capacity as a HAL flight attendant, Respondent worked HAL flight 455 from Honolulu to Manila, the Philippines, which departed at 1:24 p.m.

353. Monday, November 10, 2008, was a school day.

354. Respondent was absent for more than one-half of the school hours on November 10, 2008.

355. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 58

356. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

357. On Monday, November 10, 2008, in her capacity as a HAL flight attendant, Respondent worked HAL flight 455 from Honolulu to Manila, the Philippines.

358. On Thursday, November 13, 2008, Respondent returned to Honolulu, working HAL flight 456, which arrived at 12:01 p.m.

359. Wednesday, November 12, 2008, was a school day.

360. Respondent was absent during all of the school hours on Wednesday, November 12, 2008.

361. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 59

362. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

363. On Thursday, November 13, 2008, in her capacity as a HAL flight attendant, Respondent worked HAL flight 456 from Manila, the Philippines, to Honolulu, which arrived at 12:01 p.m.

364. Thursday, November 13, 2008, was a school day.

365. Respondent was absent for more than one-half of the school hours on November 13, 2008.

366. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 60

367. The allegations contained in paragraphs 1 through 40

herein are repeated and realleged.

368. On Wednesday, December 3, 2008, in her capacity as a HAL flight attendant, Respondent worked HAL flight 455 from Honolulu to Manila, the Philippines, which departed at 1:39 p.m.

369. Wednesday, December 3, 2008, was a school day.

370. Respondent was absent for more than one-half of the school hours on December 3, 2008.

371. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 61

372. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

373. On Wednesday, December 3, 2008, in her capacity as a HAL flight attendant, Respondent worked HAL flight 455 from Honolulu to Manila, the Philippines.

374. On Saturday, December 6, 2008, Respondent returned to Honolulu, working HAL flight 456, which arrived at 12:33 p.m.

375. Thursday, December 4, 2008, was a school day.

376. Respondent was absent during all of the school hours on Thursday, December 4, 2008.

377. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 62

378. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

379. On Wednesday, December 3, 2008, in her capacity as a HAL flight attendant, Respondent worked HAL flight 455 from Honolulu to Manila, the Philippines.

380. On Saturday, December 6, 2008, Respondent returned to Honolulu, working HAL flight 456, which arrived at 12:33 p.m.

381. Friday, December 5, 2008, was a school day.

382. Respondent was absent during all of the school hours on Friday, December 5, 2008.

383. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 63

384. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

385. On Friday, December 12, 2008, in her capacity as a HAL flight attendant, Respondent worked HAL flight 28 from Honolulu to Seattle, Washington, which departed at 1:39 p.m.

386. Friday, December 12, 2008, was a school day.

387. Respondent was absent for more than one-half of the school hours on December 12, 2008.

388. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 64

389. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

390. On Sunday, December 14, 2008, in her capacity as a HAL flight attendant, Respondent worked HAL flight 28 from Honolulu to Seattle, Washington.

391. On Tuesday, December 16, 2008, Respondent returned to Honolulu, working HAL flight 27, which arrived at 12:16 p.m.

392. Monday, December 15, 2008, was a school day.

393. Respondent was absent during all of the school hours on Monday, December 15, 2008.

394. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 65

395. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

396. On Tuesday, December 16, 2008, in her capacity as a HAL flight attendant, Respondent worked HAL flight 27 from Seattle, Washington, to Honolulu, which arrived at 12:16 p.m.

397. Tuesday, December 16, 2008, was a school day.

398. Respondent was absent for more than one-half of the school hours on December 16, 2008.

399. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 66

400. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

401. On Wednesday, January 21, 2009, in her capacity as a HAL flight attendant, Respondent worked HAL flight 16 from Honolulu to San Diego, California, which departed at 2:02 p.m.

402. Wednesday, January 21, 2009, was a school day.

403. Respondent was absent for two or more school hours on January 21, 2009.

404. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 67

405. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

406. On Thursday, January 22, 2009, in her capacity as a HAL flight attendant, Respondent worked HAL flight 15 from San Diego, California, to Honolulu, which arrived at 1:42 p.m.

407. Thursday, January 22, 2009, was a school day.

408. Respondent was absent for more than one-half of the school hours on January 22, 2009.

409. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 68

410. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

411. On Sunday, January 25, 2009, in her capacity as a HAL flight attendant, Respondent worked HAL flight 455 from Honolulu to Manila, the Philippines.

412. On Tuesday, January 27, 2009, Respondent returned to Honolulu, working HAL flight 456, which arrived at 12:06 p.m.

413. Monday, January 26, 2009, was a school day.

414. Respondent was absent during all of the school hours on Monday, January 26, 2009.

415. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 69

416. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

417. On Tuesday, January 27, 2009, in her capacity as a HAL flight attendant, Respondent worked HAL flight 456 from Manila, the Philippines, to Honolulu, which arrived at 12:06 p.m.

418. Tuesday, January 27, 2009, was a school day.

419. Respondent was absent for more than one-half of the school hours on January 27, 2009.

420. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 70

421. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

422. On Thursday, January 29, 2009, in her capacity as a HAL flight attendant, Respondent worked HAL flight 12 from Honolulu to San Francisco, California, which departed at 2:09 p.m.

423. Thursday, January 29, 2009, was a school day.

424. Respondent was absent for two or more school hours on

January 29, 2009.

425. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 71

426. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

427. On Friday, January 30, 2009, in her capacity as a HAL flight attendant, Respondent worked HAL flight 11 from San Francisco, California, to Honolulu, which arrived at 11:44 a.m.

428. Friday, January 30, 2009, was a school day.

429. Respondent was absent for more than one-half of the school hours on January 30, 2009.

430. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 72

431. The allegations contained in paragraphs 1 through 40

herein are repeated and realleged.

432. On Wednesday, February 4, 2009, in her capacity as a HAL flight attendant, Respondent worked HAL flight 16 from Honolulu to San Diego, California, which departed at 1:30 p.m.

433. Wednesday, February 4, 2009, was a school day.

434. Respondent was absent for more than one-half of the school hours on February 4, 2009.

435. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 73

436. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

437. On Thursday, February 5, 2009, in her capacity as a HAL flight attendant, Respondent worked HAL flight 15 from San Diego, California, to Honolulu, which arrived at 1:23 p.m.

438. Thursday, February 5, 2009, was a school day.

439. Respondent was absent for more than one-half of the school hours on February 5, 2009.

440. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for

herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 74

441. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

442. On Wednesday, February 11, 2009, in her capacity as a HAL flight attendant, Respondent worked HAL flight 16 from Honolulu to San Diego, California, which departed at 2:15 p.m.

443. Wednesday, February 11, 2009, was a school day.

444. Respondent was absent for two or more school hours on February 11, 2009.

445. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 75

446. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

447. On Thursday, February 12, 2009, in her capacity as a HAL flight attendant, Respondent worked HAL flight 15 from San

Diego, California, to Honolulu, which arrived at 1:26 p.m.

448. Thursday, February 12, 2009, was a school day.

449. Respondent was absent for more than one-half of the school hours on February 12, 2009.

450. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 76

451. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

452. On Wednesday, February 25, 2009, in her capacity as a HAL flight attendant, Respondent worked HAL flight 16 from Honolulu to San Diego, California, which departed at 1:18 p.m.

453. Wednesday, February 25, 2009, was a school day.

454. Respondent was absent for more than one-half of the school hours on February 25, 2009.

455. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for

those absences.

COUNT 77

456. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

457. On Thursday, February 26, 2009, in her capacity as a HAL flight attendant, Respondent worked HAL flight 15 from San Diego, California, to Honolulu, which arrived at 1:55 p.m.

458. Thursday, February 26, 2009, was a school day.

459. Respondent was absent for more than one-half of the school hours on February 26, 2009.

460. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 78

461. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

462. On Wednesday, March 4, 2009, in her capacity as a HAL flight attendant, Respondent worked HAL flight 12 from Honolulu to San Francisco, California, which departed at 2:01 p.m.

463. Wednesday, March 4, 2009, was a school day.

464. Respondent was absent for two or more school hours on

March 4, 2009.

465. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 79

466. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

467. On Thursday, March 5, 2009, in her capacity as a HAL flight attendant, Respondent worked HAL flight 11 from San Francisco, California, to Honolulu, which arrived at 12:09 p.m.

468. Thursday, March 5, 2009, was a school day.

469. Respondent was absent for more than one-half of the school hours on March 5, 2009.

470. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 80

471. The allegations contained in paragraphs 1 through 40

herein are repeated and realleged.

472. On Sunday, March 8, 2009, in her capacity as a HAL flight attendant, Respondent worked HAL flight 455 from Honolulu to Manila, the Philippines.

473. On Tuesday, March 10, 2009, Respondent returned to Honolulu, working HAL flight 456, which arrived at 11:09 a.m.

474. Monday, March 9, 2009, was a school day.

475. Respondent was absent during all of the school hours on Monday, March 9, 2009.

476. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 81

477. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

478. On Tuesday, March 10, 2009, in her capacity as a HAL flight attendant, Respondent worked HAL flight 456 from Manila, the Philippines, to Honolulu, which arrived at 11:09 a.m.

479. Tuesday, March 10, 2009, was a school day.

480. Respondent was absent for more than one-half of the school hours on March 10, 2009.

481. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 82

482. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

483. On Wednesday, March 18, 2009, in her capacity as a HAL flight attendant, Respondent worked HAL flight 12 from Honolulu to San Francisco, California, which departed at 1:30 p.m.

484. Wednesday, March 18, 2009, was a school day.

485. Respondent was absent for more than one-half of the school hours March 18, 2009.

486. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 83

487. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

488. On Thursday, March 19, 2009, in her capacity as a HAL flight attendant, Respondent worked HAL flight 11 from San Francisco, California, to Honolulu, which arrived at 11:16 a.m.

489. Thursday, March 19, 2009, was a school day.

490. Respondent was absent for more than one-half of the school hours on March 19, 2009.

491. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 84

492. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

493. On Monday, April 27, 2009, in her capacity as a HAL flight attendant, Respondent worked HAL flight 25 from Portland, Oregon, to Honolulu, which arrived at 11:33 a.m.

494. Monday, April 27, 2009, was a school day.

495. Respondent was absent for more than one-half of the school hours on April 27, 2009.

496. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for

herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 85

497. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

498. On Wednesday, April 29, 2009, in her capacity as a HAL flight attendant, Respondent worked HAL flight 26 from Honolulu to Portland, Oregon, which departed at 1:22 p.m.

499. Wednesday, April 29, 2009, was a school day.

500. Respondent was absent for more than one-half of the school hours on April 29, 2009.

501. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 86

502. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

503. On Thursday, April 30, 2009, in her capacity as a HAL flight attendant, Respondent worked HAL flight 25 from Portland,

Oregon, to Honolulu, which arrived at 11:36 a.m.

504. Thursday, April 30, 2009, was a school day.

505. Respondent was absent for more than one-half of the school hours on April 30, 2009.

506. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 87

507. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

508. On Tuesday, May 5, 2009, in her capacity as a HAL flight attendant, Respondent worked HAL flight 27 from Seattle, Washington, to Honolulu, which arrived at 11:26 a.m.

509. Tuesday, May 5, 2009, was a school day.

510. Respondent was absent for more than one-half of the school hours on May 5, 2009.

511. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for

those absences.

COUNT 88

512. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

513. On Sunday, May 10, 2009, in her capacity as a HAL flight attendant, Respondent worked HAL flight 455 from Honolulu to Manila, the Philippines.

514. On Tuesday, May 12, 2009, Respondent returned to Honolulu, working HAL flight 456, which arrived at 11:41 a.m.

515. Monday, May 11, 2009, was a school day.

516. Respondent was absent during all of the school hours on Monday, May 11, 2009.

517. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 89

518. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

519. On Tuesday, May 12, 2009, in her capacity as a HAL flight attendant, Respondent worked HAL flight 456 from Manila, the Philippines, to Honolulu, which arrived at 11:41 a.m.

520. Tuesday, May 12, 2009, was a school day.

521. Respondent was absent for more than one-half of the school hours on May 12, 2009.

522. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 90

523. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

524. On Sunday, May 17, 2009, in her capacity as a HAL flight attendant, Respondent worked HAL flight 455 from Honolulu to Manila, the Philippines.

525. On Tuesday, May 19, 2009, Respondent returned to Honolulu, working HAL flight 456, which arrived at 11:29 a.m.

526. Monday, May 18, 2009, was a school day.

527. Respondent was absent during all of the school hours on Monday, May 18, 2009.

528. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or

otherwise be absent during school hours without accounting for those absences.

COUNT 91

529. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

530. On Tuesday, May 19, 2009, in her capacity as a HAL flight attendant, Respondent worked HAL flight 456 from Manila, the Philippines, to Honolulu, which arrived at 11:29 a.m.

531. Tuesday, May 19, 2009, was a school day.

532. Respondent was absent for more than one-half of the school hours on May 19, 2009.

533. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 92

534. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

535. On Tuesday, May 26, 2009, as a non-revenue passenger, Respondent flew HAL flight 27 from Seattle, Washington, to Honolulu, which arrived at 10:50 a.m.

536. Tuesday, May 26, 2009, was a school day.

537. Respondent was absent for two or more school hours on May 26, 2009.

538. In light of HAL's policy governing employees' non-revenue travel privileges, Respondent's absence was for personal travel and not for MBTA-related business.

539. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 93

540. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

541. On Friday, June 5, 2009, in her capacity as a HAL flight attendant, Respondent worked HAL flight 26 from Honolulu to Portland, Oregon, which departed at 1:17 p.m.

542. Friday, June 5, 2009, was a school day.

543. Respondent was absent for more than one-half of the school hours on June 5, 2009.

544. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or

otherwise be absent during school hours without accounting for those absences.

D. SCHOOL YEAR 2009-2010 ABSENCES(Counts 94-118)

COUNT 94

545. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

546. On Monday, August 3, 2009, in her capacity as a HAL flight attendant, Respondent worked HAL flight 25 from Portland, Oregon, to Honolulu, which arrived at 11:12 a.m.

547. Monday, August 3, 2009, was a school day.

548. Respondent was absent for more than one-half of the school hours on August 3, 2009.

549. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 95

550. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

551. On Monday, August 10, 2009, in her capacity as a HAL flight attendant, Respondent worked HAL flight 25 from Portland, Oregon, to Honolulu, which arrived at 11:31 a.m.

552. Monday, August 10, 2009, was a school day.

553. Respondent was absent for more than one-half of the school hours August 10, 2009.

554. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 96

555. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

556. On Monday, August 24, 2009, in her capacity as a HAL flight attendant, Respondent worked HAL flight 25 from Portland, Oregon, to Honolulu, which arrived at 11:24 a.m.

557. Monday, August 24, 2009, was a school day.

558. Respondent was absent for more than one-half of the school hours on August 24, 2009.

559. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 97

560. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

561. On Sunday, August 30, 2009, in her capacity as a HAL flight attendant, Respondent worked HAL flight 455 from Honolulu to Manila, the Philippines.

562. On Tuesday, September 1, 2009, Respondent returned to Honolulu, working HAL flight 456, which arrived at 11:33 a.m.

563. Monday, August 31, 2009, was a school day.

564. Respondent was absent during all of the school hours on Monday, August 31, 2009.

565. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 98

566. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

567. On Tuesday, September 1, 2009, in her capacity as a HAL flight attendant, Respondent worked HAL flight 456 from Manila, the Philippines, to Honolulu, which arrived at 11:33 a.m.

568. Tuesday, September 1, 2009, was a school day.

569. Respondent was absent for more than one-half of the school hours on September 1, 2009.

570. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 99

571. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

572. On Tuesday, September 8, 2009, in her capacity as a HAL flight attendant, Respondent worked HAL flight 456 from Manila, the Philippines, to Honolulu, which arrived at 11:14 a.m.

573. Tuesday, September 8, 2009, was a school day.

574. Respondent was absent for more than one-half of the school hours on September 8, 2009.

575. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for

those absences.

COUNT 100

576. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

577. On Thursday, September 10, 2009, as a non-revenue passenger, Respondent flew HAL flight 7 from Las Vegas, Nevada, to Honolulu, which arrived at 1:35 p.m.

578. Thursday, September 10, 2009, was a school day.

579. Respondent was absent for more than one-half of the school hours on September 10, 2009.

580. In light of HAL's policy governing employees' non-revenue travel privileges, Respondent's absence was for personal travel and not for MBTA-related business.

581. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 101

582. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

583. On Monday, September 14, 2009, in her capacity as a HAL flight attendant, Respondent worked HAL flight 25 from

Portland, Oregon, to Honolulu, which arrived at 11:33 a.m.

584. Monday, September 14, 2009, was a school day.

585. Respondent was absent for more than one-half of the school hours on September 14, 2009.

586. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 102

587. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

588. On Monday, September 21, 2009, in her capacity as a HAL flight attendant, Respondent worked HAL flight 25 from Portland, Oregon, to Honolulu, which arrived at 11:20 a.m.

589. Monday, September 21, 2009, was a school day.

590. Respondent was absent for more than one-half of the school hours on September 21, 2009.

591. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for

those absences.

COUNT 103

592. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

593. On Friday, October 2, 2009, in her capacity as a HAL flight attendant, Respondent worked HAL flight 455 from Honolulu to Manila, the Philippines, which departed at 12:43 p.m.

594. Friday, October 2, 2009, was a school day.

595. Respondent was absent for more than one-half of the school hours on October 2, 2009.

596. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 104

597. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

598. On Monday, October 12, 2009, Respondent returned to Honolulu, working HAL flight 1007, which arrived at 3:43 p.m.

599. Monday, October 12, 2009, was a school day.

600. Respondent was absent during all of the school hours on Monday, October 12, 2009.

601. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 105

602. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

603. On Tuesday, November 10, 2009, as a non-revenue passenger, Respondent flew HAL flight 16 from Honolulu to San Diego, California, which departed at 1:20 p.m.

604. Tuesday, November 10, 2009, was a school day.

605. Respondent was absent for more than one-half of the school hours on November 10, 2009.

606. In light of HAL's policy governing employees' non-revenue travel privileges, Respondent's absence was for personal travel and not for MBTA-related business.

607. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 106

608. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

609. On Tuesday, November 10, 2009, as a non-revenue passenger, Respondent flew HAL flight 16 from Honolulu to San Diego, California, which departed at 1:20 p.m.

610. On Friday, November 13, 2009, Respondent returned to Honolulu as a non-revenue passenger on HAL flight 15.

611. Thursday, November 12, 2009, was a school day.

612. Respondent was absent during all of the school hours on Thursday, November 12, 2009.

613. In light of HAL's policy governing employees' non-revenue travel privileges, Respondent's absence was for personal travel and not for MBTA-related business.

614. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 107

615. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

616. On Friday, November 13, 2009, as a non-revenue

passenger, Respondent flew HAL flight 15 from San Diego, California, to Honolulu, which arrived at 1:00 p.m.

617. Friday, November 13, 2009, was a school day.

618. Respondent was absent for more than one-half of the school hours on November 13, 2009.

619. In light of HAL's policy governing employees' non-revenue travel privileges, Respondent's absence was for personal travel and not for MBTA-related business.

620. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 108

621. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

622. On Monday, November 16, 2009, in her capacity as a HAL flight attendant, Respondent worked HAL flight 25 from Portland, Oregon, to Honolulu, which arrived at 12:38 p.m.

623. Monday, November 16, 2009, was a school day.

624. Respondent was absent for more than one-half of the school hours on November 16, 2009.

625. Respondent violated sections 84-13 and/or 84-13(3),

HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 109

626. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

627. On Thursday, December 3, 2009, in her capacity as a HAL flight attendant, Respondent worked HAL flight 26 from Honolulu to Portland, Oregon, which departed at 2:08 p.m.

628. Thursday, December 3, 2009, was a school day.

629. Respondent was absent for two or more school hours on December 3, 2009.

630. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 110

631. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

632. On Friday, December 4, 2009, in her capacity as a HAL

flight attendant, Respondent worked HAL flight 25 from Portland, Oregon, to Honolulu, which arrived at 1:12 p.m.

633. Friday, December 4, 2009, was a school day.

634. Respondent was absent for more than one-half of the school hours on December 4, 2009.

635. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 111

636. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

637. On Friday, December 18, 2009, in her capacity as a HAL flight attendant, Respondent worked HAL flight 455 from Honolulu to Manila, the Philippines, which departed at 2:10 p.m.

638. Friday, December 18, 2009, was a school day.

639. Respondent was absent for two or more school hours on December 18, 2009.

640. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or

otherwise be absent during school hours without accounting for those absences.

COUNT 112

641. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

642. On Sunday, January 3, 2010, in her capacity as a HAL flight attendant, Respondent worked HAL flight 455 from Honolulu to Manila, the Philippines.

643. On Tuesday, January 5, 2010, Respondent returned to Honolulu, working HAL flight 456, which arrived at 11:38 a.m.

644. Monday, January 4, 2010, was a school day.

645. Respondent was absent during all of the school hours on Monday, January 4, 2010.

646. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 113

647. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

648. On Tuesday, January 5, 2010, in her capacity as a HAL flight attendant, Respondent worked HAL flight 456 from Manila,

the Philippines, to Honolulu, which arrived at 11:38 a.m.

649. Tuesday, January 5, 2010, was a school day.

650. Respondent was absent for more than one-half of the school hours on January 5, 2010.

651. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 114

652. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

653. On Sunday, January 10, 2010, in her capacity as a HAL flight attendant, Respondent worked HAL flight 455 from Honolulu to Manila, the Philippines.

654. On Tuesday, January 12, 2010, Respondent returned to Honolulu, working HAL flight 456, which arrived at 12:22 p.m.

655. Monday, January 11, 2010, was a school day.

656. Respondent was absent during all of the school hours on Monday, January 11, 2010.

657. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and

treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 115

658. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

659. On Tuesday, January 12, 2010, in her capacity as a HAL flight attendant, Respondent worked HAL flight 456 from Manila, the Philippines, to Honolulu, which arrived at 12:22 p.m.

660. Tuesday, January 12, 2010, was a school day.

661. Respondent was absent for more than one-half of the school hours on January 12, 2010.

662. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 116

663. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

664. On Sunday, May 2, 2010, in her capacity as a HAL flight attendant, Respondent worked HAL flight 455 from Honolulu to Manila, the Philippines.

665. On Tuesday, May 4, 2010, Respondent returned to Honolulu, working HAL flight 456, which arrived at 10:43 a.m.

666. Monday, May 3, 2010, was a school day.

667. Respondent was absent during all of the school hours on Monday, May 3, 2010.

668. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 117

669. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

670. On Tuesday, May 4, 2010, in her capacity as a HAL flight attendant, Respondent worked HAL flight 456 from Manila, the Philippines, to Honolulu, which arrived at 10:43 a.m.

671. Tuesday, May 4, 2010, was a school day.

672. Respondent was absent for two or more school hours on May 4, 2010.

673. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or

otherwise be absent during school hours without accounting for those absences.

COUNT 118

674. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

675. On Tuesday, June 1, 2010, in her capacity as a HAL flight attendant, Respondent worked HAL flight 456 from Manila, the Philippines, to Honolulu, which arrived at 11:48 a.m.

676. Tuesday, June 1, 2010, was a school day.

677. Respondent was absent for more than one-half of the school hours on June 1, 2010.

678. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

E. SCHOOL YEAR 2010-2011 ABSENCES (Counts 119-135)

COUNT 119

679. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

680. On Tuesday, August 3, 2010, in her capacity as a HAL flight attendant, Respondent worked HAL flight 4 from Honolulu to Los Angeles, California.

681. On Wednesday, August 4, 2010, Respondent returned to Honolulu, working HAL flight 9, which arrived at 8:34 p.m.

682. Wednesday, August 4, 2010, was a school day.

683. Respondent was absent during all of the school hours on Wednesday, August 4, 2010.

684. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 120

685. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

686. On Sunday, October 10, 2010, in her capacity as a HAL flight attendant, Respondent worked HAL flight 8 from Honolulu to Las Vegas, Nevada.

687. On Tuesday, October 12, 2010, Respondent returned to Honolulu, working HAL flight 17, which arrived at 5:38 a.m.

688. Monday, October 11, 2010, was a school day.

689. Respondent was absent during all of the school hours on Monday, October 11, 2010.

690. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for

herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 121

691. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

692. On Wednesday, October 27, 2010, in her capacity as a HAL flight attendant, Respondent worked HAL flight 18 from Honolulu to Las Vegas, Nevada, which departed at 2:26 p.m.

693. Wednesday, October 27, 2010, was a school day.

694. Respondent was absent for two or more school hours on October 27, 2010.

695. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 122

696. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

697. On Wednesday, October 27, 2010, in her capacity as a HAL flight attendant, Respondent worked HAL flight 18 from

Honolulu to Las Vegas, Nevada.

698. On Friday, October 29, 2010, Respondent returned to Honolulu, working HAL flight 7, which arrived at 12:15 p.m.

699. Thursday, October 28, 2010, was a school day.

700. Respondent was absent during all of the school hours on Thursday, October 28, 2010.

701. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 123

702. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

703. On Friday, October 29, 2010, in her capacity as a HAL flight attendant, Respondent worked HAL flight 7 from Las Vegas, Nevada, to Honolulu, which arrived in Honolulu at 12:15 p.m.

704. Friday, October 29, 2010, was a school day.

705. Respondent was absent for more than one-half of the school hours on October 29, 2010.

706. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and

treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 124

707. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

708. On Monday, November 1, 2010, in her capacity as a HAL flight attendant, Respondent worked HAL flight 22 from Honolulu to Seattle, Washington, which departed at 1:40 p.m.

709. Monday, November 1, 2010, was a school day.

710. Respondent was absent for more than one-half of the school hours on November 1, 2010.

711. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 125

712. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

713. On Wednesday, November 3, 2010, in her capacity as a HAL flight attendant, Respondent worked HAL flight 48 from Honolulu to Oakland, California, which departed at 12:40 p.m.

714. Wednesday, November 3, 2010, was a school day.

715. Respondent was absent for more than one-half of the school hours on November 3, 2010.

716. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 126

717. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

718. On Thursday, November 4, 2010, in her capacity as a HAL flight attendant, Respondent worked HAL flight 47 from Oakland, California, to Honolulu, which arrived at 11:43 a.m.

719. Thursday, November 4, 2010, was a school day.

720. Respondent was absent for more than one-half of the school hours on November 4, 2010.

721. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 127

722. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

723. On Tuesday, November 9, 2010, in her capacity as a HAL flight attendant, Respondent worked HAL flight 456 from Manila, the Philippines, to Honolulu, which arrived at 11:41 a.m.

724. Tuesday, November 9, 2010, was a school day.

725. Respondent was absent for more than one-half of the school hours on November 9, 2010.

726. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 128

727. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

728. On Friday, November 19, 2010, in her capacity as a HAL flight attendant, Respondent worked HAL flight 12 from Honolulu to San Francisco, California, which departed at 2:23 p.m.

729. Friday, November 19, 2010, was a school day.

730. Respondent was absent for two or more school hours on November 19, 2010.

731. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 129

732. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

733. On Tuesday, November 23, 2010, in her capacity as a HAL flight attendant, Respondent worked HAL flight 456 from Manila, the Philippines, to Honolulu, which arrived at 12:06 p.m.

734. Tuesday, November 23, 2010, was a school day.

735. Respondent was absent for more than one-half of the school hours on November 23, 2010.

736. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 130

737. The allegations contained in paragraphs 1 through 40

herein are repeated and realleged.

738. On Monday, November 29, 2010, in her capacity as a HAL flight attendant, Respondent worked HAL flight 456 from Manila, the Philippines, to Honolulu, which arrived at 12:24 p.m.

739. Monday, November 29, 2010, was a school day.

740. Respondent was absent for more than one-half of the school hours on November 29, 2010.

741. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 131

742. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

743. On Thursday, January 6, 2011, as a non-revenue passenger, Respondent flew HAL flight 10 from Honolulu to Los Angeles, California, which departed at 8:00 a.m.

744. On Monday, January 10, 2011, Respondent returned to Honolulu as a non-revenue passenger on HAL flight 1, which arrived at 12:55 p.m.

745. Thursday, January 6, 2011, was a school day.

746. Respondent was absent during all of the school hours

on Thursday, January 6, 2011.

747. In light of HAL's policy governing employees' non-revenue travel privileges, Respondent's absence was for personal travel and not for MBTA-related business.

748. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 132

749. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

750. On Thursday, January 6, 2011, as a non-revenue passenger, Respondent flew HAL flight 10 from Honolulu to Los Angeles, California, which departed at 8:00 a.m.

751. On Monday, January 10, 2011, Respondent returned to Honolulu as a non-revenue passenger on HAL flight 1, which arrived at 12:55 p.m.

752. Friday, January 7, 2011, was a school day.

753. Respondent was absent during all of the school hours on Friday, January 7, 2011.

754. In light of HAL's policy governing employees' non-revenue travel privileges, Respondent's absence was for personal

travel and not for MBTA-related business.

755. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 133

756. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

757. On Monday, January 10, 2011, as a non-revenue passenger, Respondent flew HAL flight 1 from Los Angeles, California, to Honolulu, which arrived at 12:55 p.m.

758. Monday, January 10, 2011, was a school day.

759. Respondent was absent for more than one-half of the school hours on January 10, 2011.

760. In light of HAL's policy governing employees' non-revenue travel privileges, Respondent's absence was for personal travel and not for MBTA-related business.

761. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for

those absences.

COUNT 134

762. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

763. On Thursday, January 13, 2011, as a non-revenue passenger, Respondent flew HAL flight 22 from Honolulu to Seattle, Washington, which departed at 2:45 p.m.

764. Thursday, January 13, 2011, was a school day.

765. Respondent was absent for two or more school hours on January 13, 2011.

766. In light of HAL's policy governing employees' non-revenue travel privileges, Respondent's absence was for personal travel and not for MBTA-related business.

767. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 135

768. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

769. On Friday, January 21, 2011, in her capacity as a HAL flight attendant, Respondent worked HAL flight 22 from Honolulu

to Seattle, Washington, which departed at 2:41 p.m.

770. Friday, January 21, 2011, was a school day.

771. Respondent was absent for two or more school hours on January 21, 2011.

772. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

F. SCHOOL YEAR 2011-2012 ABSENCES (Counts 136-146)

COUNT 136

773. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

774. On Friday, September 2, 2011, in her capacity as a HAL flight attendant, Respondent worked HAL flight 455 from Honolulu to Manila, the Philippines, which departed at 12:51 p.m.

775. Friday, September 2, 2011, was a school day.

776. Respondent was absent for more than one-half of the school hours on September 2, 2011.

777. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or

otherwise be absent during school hours without accounting for those absences.

COUNT 137

778. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

779. On Wednesday, September 21, 2011, as a non-revenue passenger, Respondent flew HAL flight 2 from Honolulu to Los Angeles, California, which departed at 2:20 p.m.

780. Wednesday, September 21, 2011, was a school day.

781. Respondent was absent for two or more school hours on September 21, 2011.

782. In light of HAL's policy governing employees' non-revenue travel privileges, Respondent's absence was for personal travel and not for MBTA-related business.

783. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 138

784. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

785. On Thursday, September 22, 2011, as a non-revenue

passenger, Respondent flew HAL flight 1 from Los Angeles, California to Honolulu, which arrived at 11:30 a.m.

786. Thursday, September 22, 2011, was a school day.

787. Respondent was absent for more than one-half of the school hours on September 22, 2011.

788. In light of HAL's policy governing employees' non-revenue travel privileges, Respondent's absence was for personal travel and not for MBTA-related business.

789. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 139

790. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

791. On Friday, November 11, 2011, in her capacity as a HAL flight attendant, Respondent worked HAL flight 455 from Honolulu to Manila, the Philippines, which departed at 1:27 p.m.

792. Friday, November 11, 2011, was a school day.

793. Respondent was absent for more than one-half of the school hours on November 11, 2011.

794. Respondent violated sections 84-13 and/or 84-13(3),

HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 140

795. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

796. On Monday, November 14, 2011, in her capacity as a HAL flight attendant, Respondent worked HAL flight 456 from Manila, the Philippines, to Honolulu, which arrived at 12:20 p.m.

797. Monday, November 14, 2011, was a school day.

798. Respondent was absent for more than one-half of the school hours on November 14, 2011.

799. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 141

800. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

801. On Friday, January 13, 2012, in her capacity as a HAL

flight attendant, Respondent worked HAL flight 466 from Pago Pago, American Samoa, to Honolulu, which arrived at 12:07 p.m.

802. Friday, January 13, 2012, was a school day.

803. Respondent was absent for more than one-half of the school hours on January 13, 2012.

804. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 142

805. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

806. On Friday, February 10, 2012, as a non-revenue passenger, Respondent flew HAL flight 36 from Honolulu to Phoenix, Arizona, which departed at 3:10 p.m.

807. Friday, February 10, 2012, was a school day.

808. Respondent was absent for two or more school hours on February 10, 2012.

809. In light of HAL's policy governing employees' non-revenue travel privileges, Respondent's absence was for personal travel and not for MBTA-related business.

810. Respondent violated sections 84-13 and/or 84-13(3),

HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 143

811. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

812. On Friday, February 10, 2012, as a non-revenue passenger, Respondent flew HAL flight 36 from Honolulu to Phoenix, Arizona, which departed at 3:10 p.m.

813. On Tuesday, February 14, 2012, Respondent returned to Honolulu as a non-revenue passenger on HAL flight 35, which arrived at 11:50 a.m.

814. Monday, February 13, 2012, was a school day.

815. Respondent was absent during all of the school hours on Monday, February 13, 2012.

816. In light of HAL's policy governing employees' non-revenue travel privileges, Respondent's absence was for personal travel and not for MBTA-related business.

817. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 144

818. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

819. On Tuesday, February 14, 2012, as a non-revenue passenger, Respondent flew HAL flight 35 from Phoenix, Arizona, to Honolulu, which arrived at 11:50 a.m.

820. Tuesday, February 14, 2012, was a school day.

821. Respondent was absent for more than one-half of the school hours on February 14, 2012.

822. In light of HAL's policy governing employees' non-revenue travel privileges, Respondent's absence was for personal travel and not for MBTA-related business.

823. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 145

824. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

825. On Monday, April 23, 2012, in her capacity as a HAL flight attendant, Respondent worked HAL flight 454 from Fukuoka, Japan, to Honolulu, which arrived at 10:16 a.m.

826. Monday, April 23, 2012, was a school day.

827. Respondent was absent for two or more school hours on April 23, 2012.

828. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

COUNT 146

829. The allegations contained in paragraphs 1 through 40 herein are repeated and realleged.

830. On Monday, April 30, 2012, in her capacity as a HAL flight attendant, Respondent worked HAL flight 454 from Fukuoka, Japan, to Honolulu, which arrived at 10:04 a.m.

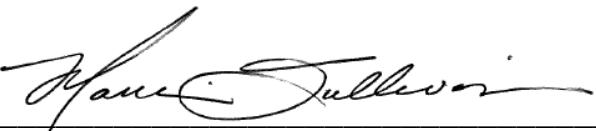
831. Monday, April 30, 2012, was a school day.

832. Respondent violated sections 84-13 and/or 84-13(3), HRS, by using her position as Vice Principal to secure for

herself unwarranted privileges, exemptions, advantages and treatment that enabled her to work as a HAL flight attendant or otherwise be absent during school hours without accounting for those absences.

Dated: February 26, 2013.

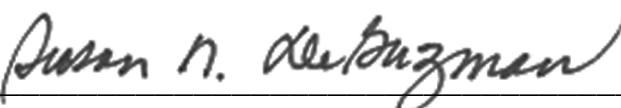
HAWAII STATE ETHICS COMMISSION



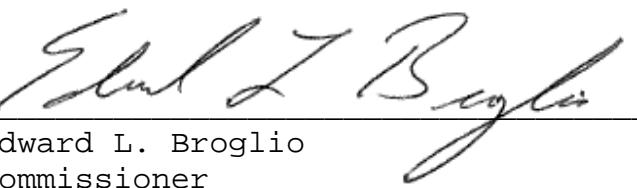
Maria J. Sullivan, Esq.
Chairperson



Cassandra J. Leolani Abdul
Vice Chairperson



Susan N. DeGuzman
Commissioner



Edward L. Broglio
Commissioner

Note: There was a vacancy on the Commission when this Charge was considered.