

**Bentley University and Bentley University Public Safety Association.** Case 01–CA–111570

December 10, 2014

DECISION AND ORDER

BY MEMBERS HIROZAWA, JOHNSON, AND SCHIFFER

On March 25, 2014, Administrative Law Judge Joel P. Biblowitz issued the attached decision. The Respondent filed exceptions and a supporting brief, and the General Counsel filed an answering brief.

The National Labor Relations Board has delegated its authority in this proceeding to a three-member panel.

The Board has considered the decision and the record in light of the exceptions and briefs and has decided to affirm the judge’s rulings, findings, and conclusions and to adopt the recommended Order as modified.<sup>1</sup>

We adopt the judge’s finding that the Respondent violated Section 8(a)(1) of the Act by denying employee Maria Canino union representation at an investigatory meeting where the Respondent prohibited her representative from speaking.<sup>2</sup> In affirming the judge’s decision, we agree, for the reasons set forth therein, that Canino would have reasonably believed that the meeting could result in discipline. We also agree that the meeting was investigatory for the purposes of the *Weingarten* analysis.

On June 28, 2013,<sup>3</sup> campus security guard Canino had a confrontation with her shift supervisor, Sergeant Carmelo Echevarria, about Canino’s work assignment. Afterward, Echevarria complained to his superior officers, Lieutenants Williams and Flint, about his exchange with Canino, asserting, among other things, that Canino had been insubordinate. On July 10, Canino was called to the station to speak to Lieutenant Williams, who asked her about the “fight” that she had had with Echevarria. After Canino told Williams that she thought it was a misunderstanding, Williams requested that she tell Echevarria that she and Williams had discussed the matter.

Thereafter, Canino and Echevarria exchanged emails on July 11 and 14, but rather than settling the matter, these exchanges reignited their disagreement. Echevarria’s email to Canino suggested, in part, that she needed

to “understand how to address [her] supervisor” and that he was glad that they had “addressed the issue.” In response, Canino disputed Echevarria’s statement about her “understanding on how to address a supervisor” and expressed confusion over the “addressed the issue” comment, asking, “What issue are you referring to?” At that point, in an email copied to Flint and Williams, Echevarria wrote to Canino that “there are obvious issues that need to be addressed,” and that they would need to have a meeting with both lieutenants. Having never previously been called before both lieutenants, and knowing that Echevarria was upset with her, Canino would have reasonably believed that Echevarria sought to make a case against her.

The meeting took place on August 15 and included Canino, Echevarria, Williams, Flint, and employee and Union President Kevin McDonnell, who was present as Canino’s *Weingarten* representative. Echevarria and Canino spent most of the meeting giving the lieutenants their respective versions of their confrontation. This was the first time that Canino told the lieutenants her side of the story; in her first discussion with Williams about the confrontation, as described above, she stated that it had been a misunderstanding and did not go into any detail about the incident. Echevarria complained about Canino’s attitude, and asserted that Canino had yelled at him and that it was frustrating working with her because she made decisions that she was not supposed to make. When McDonnell asked what those decisions were, Williams told him that he was not allowed to speak, cutting off McDonnell’s effort to assist Canino by clarifying facts underlying the accusation against her. After hearing the accounts from Echevarria and Canino, Williams admonished Canino, telling her that if a superior tells her to do something, “you need to do it.” Canino was not disciplined as a result of the meeting.

The Board has consistently found that an interview is investigatory for *Weingarten* purposes where, as here, an employee is summoned in front of management to explain his or her version of a disputed event.<sup>4</sup> In addition,

<sup>4</sup> See *Titanium Metals Corp.*, 340 NLRB 766, 774 (2003) (a meeting to administer predetermined discipline became an investigatory interview when the employer interrogated and searched the employee to obtain evidence in support of its disciplinary decision), rev. granted in part on other grounds 392 F.3d 439 (D.C. Cir. 2004); *Storer Communications*, 292 NLRB 894, 897 (1989) (finding meeting investigatory where its purpose “was to give the employees an opportunity to tell their side of the story”); *Price Pfister, a Division of Norris Industries*, 256 NLRB 87, 89 (1981) (a meeting to mete out predetermined discipline was transformed into an investigatory interview when the employer’s broad opening comment—“I understand you had some trouble in the department this morning”—elicited an admission of wrongdoing); *Texaco, Inc.*, 251 NLRB 633, 634 fn. 8, 636 (1980) (although employee was initially summoned to receive discipline, a meeting

<sup>1</sup> We shall modify the judge’s recommended Order to provide for the posting of the notice in accordance with *J. Picini Flooring*, 356 NLRB 606 (2010), enf. 656 F.3d 860 (9th Cir. 2011), and we shall substitute a new notice in accordance with *Durham School Services*, 360 NLRB 694 (2014).

<sup>2</sup> Under Sec.7 of the Act, a union-represented employee has the right to the presence and active assistance of a union representative at an investigatory interview that the employee reasonably believes may result in discipline. *NLRB v. J. Weingarten, Inc.*, 420 U.S. 251 (1971).

<sup>3</sup> All dates are in 2013.

Echevarria made clear that he scheduled the meeting because he was not satisfied with Canino's refusal to accept that there was a problem with her conduct. In these circumstances, we agree with the judge that Canino reasonably believed that discipline might result from the meeting.<sup>5</sup> As the judge found, because Canino would have reasonably feared discipline, she had a right to the active assistance of her union representative.<sup>6</sup> By denying her that assistance, the Respondent violated Section 8(a)(1) of the Act.

### ORDER

The National Labor Relations Board adopts the recommended Order of the administrative law judge as modified below and orders that the Respondent, Bentley University, Waltham, Massachusetts, its officers, agents, successors, and assigns, shall take the action set forth in the Order as modified.

1. Substitute the following for paragraph 2(a).

(a) Within 14 days after service by the Region, post at its Waltham, Massachusetts facility copies of the attached notice marked "Appendix."<sup>3</sup> Copies of the notice, on forms provided by the Regional Director for Region 1, after being signed by the Respondent's authorized representative, shall be posted by the Respondent and maintained for 60 consecutive days in conspicuous places, including all places where notices to employees are customarily posted. In addition to physical posting of paper notices, notices shall be distributed electronically, such as by email, posting on an intranet or an internet site, and/or other electronic means, if the Respondent customarily communicates with its employees by such means. Reasonable steps shall be taken by the Respondent to ensure that the notices are not altered, defaced, or covered by any other material. If the Respondent has

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became an investigatory interview when the employer asked the employee for his side of the story and obtained an admission), enfd. 659 F.2d 124 (9th Cir. 1981); *Potter Electric Signal Co.*, 237 NLRB 1289, 1290-1291 (1978) (obtaining employees' stories regarding their physical altercation was investigatory), enfd. in relevant part 600 F.2d 120 (8th Cir. 1979).

<sup>5</sup> Although, in the circumstances of this case, Echevarria's scheduling of the followup meeting with Canino and upper management to address "obvious issues" contributed to the reasonableness of Canino's fear of discipline, a one-on-one followup meeting between an employee and her supervisor (without upper management) could also support such a belief.

<sup>6</sup> Member Johnson notes that, because Canino's belief that the meeting could have resulted in discipline was reasonable at the time that the Respondent prevented McDonnell from speaking, it was the Respondent's burden to explain that it was not allowing McDonnell to speak because there was no threat of discipline to Canino resulting from the meeting. Because the Respondent failed to explain this, it does not matter that by the end of the meeting it may no longer have been reasonable for Canino to have expected that discipline might result.

gone out of business or closed the facility involved in these proceedings, the Respondent shall duplicate and mail, at its own expense, a copy of the notice to all current employees and former employees employed by the Respondent at any time since August 15, 2013."

2. Substitute the attached notice for that of the administrative law judge.

### APPENDIX

#### NOTICE TO EMPLOYEES

#### POSTED BY ORDER OF THE

#### NATIONAL LABOR RELATIONS BOARD

#### An Agency of the United States Government

The National Labor Relations Board has found that we violated Federal labor law and has ordered us to post and obey this notice.

#### FEDERAL LAW GIVES YOU THE RIGHT TO

Form, join, or assist a union

Choose representatives to bargain with us on your behalf

Act together with other employees for your benefit and protection

Choose not to engage in any of these protected activities.

WE WILL NOT deny to any of our bargaining-unit employees the right to be represented on request by Bentley University Public Safety Association at any investigatory interview that the employee reasonably believes might result in disciplinary action.

WE WILL NOT in any like or related manner interfere with, restrain, or coerce you in the exercise of the rights guaranteed you by Section 7 of the Act.

BENTLEY UNIVERSITY

The Board's decision can be found at [www.nlr.gov/case/01-CA-111570](http://www.nlr.gov/case/01-CA-111570) or by using the QR code below. Alternatively, you can obtain a copy of the decision from the Executive Secretary, National Labor Relations Board, 1099 14th St. N.W., Washington, D.C. 20570, or by calling (202) 273-1940.



*Karen Hickey, Esq.*, for the General Counsel.  
*Arthur Telegen, Esq. and Jean Wilson, Esq. (Seyfarth Shaw LLP)*, for the Respondent.  
*Thomas Horgan, Esq. (Law Offices of Michael Hanely, LLC)*, for the Charging Party.

## DECISION

### STATEMENT OF THE CASE

JOEL P. BIBLOWITZ, Administrative Law Judge. This case was heard by me on February 19, 2014, in Boston, Massachusetts. The complaint, which issued on November 29, 2013,<sup>1</sup> and was based upon an unfair labor practice charge that was filed on August 20 by Bentley University Public Safety Association (the Union), alleges that Bentley University (the Respondent), violated Section 8(a)(1) of the Act by conducting an investigatory interview with employee Maria Canino after she requested to have a representative of the Union present with her, and continued the interview while requiring the union representative to be silent during the interview, although Canino had a reasonable cause to believe that the interview could result in disciplinary action being taken against her.

#### I. JURISDICTION AND LABOR ORGANIZATION STATUS

The Respondent admits, and I find that it has been engaged in commerce within the meaning of Section 2(2), (6), and (7) of the Act and that the Union has been a labor organization within the meaning of Section 2(5) of the Act.

#### II. THE FACTS

Canino was employed as a police officer by the Respondent's public safety department from January 2010 to November. The Union began representing the police officers in about June, at which time she became a member of the Union. She worked from 3 to 11 p.m., 4 days on and 2 days off. At the time, there were 18 patrolmen reporting to 9 sergeants, who reported to the 2 lieutenants, William Williams and Panashe Flint. In addition to their regular assignments of patrolling the campus, the Respondent's officers are occasionally assigned to details, which usually involved construction or party events on the Respondent's campus, where it was determined that there might be safety issues. Canino was assigned to such a detail from 7 a.m. to 3 p.m. on June 28, where some construction was scheduled at the entrance to the campus. She attended roll call that day and then went to the detail location. When nobody appeared she returned to the station and reported to the shift sergeant, Sergeant Echevarria that the detail was canceled, but that she had some online training to perform, as well as another case that she could complete; he did not respond. At about 10:30 that morning Echevarria called her back to the station and when she returned he asked her if she thought that she was just going to remain at work all day and work, and she said that after her detail was canceled she did her online work and followed up on one of her cases. He replied that she couldn't stay if her detail had been canceled: "You just can't do whatever you want." She was

<sup>1</sup> Unless indicated otherwise, all dates referred to here relate to the year 2013.

surprised because in the past, when details were canceled, she was permitted to remain at work, and she told him that she would take a vacation day, but he said that he would not allow her to take a vacation day. She said that she was being treated unfairly because in the past she had been permitted to remain at work when her detail was canceled, and he responded that he treats everybody fairly. At that point, she went home and returned to work at 3 a.m. for her regular shift. She testified that during this meeting with Echevarria she may have raised her voice and may have used vulgarities.

The next time that she heard of the incident was on July 10, when she was called to the station to speak to Lieutenant Williams, Echevarria's supervisor, and he asked her what happened with the "fight" that she had with Echevarria. He said that he had spoken to Echevarria about the argument that they had and Echevarria was upset and frustrated about it. He also said that it sounded like she was on the defense because he was yelling and she was attempting to defend herself. She responded that she thought that it was just a misunderstanding between them and he told her that Echevarria was working the following day and that she should tell him that they spoke about it, and she said that she would do so. On the following morning, she saw Echevarria, told him that she had spoken with Williams and said, "I'm okay with everything, are we okay?" and he responded, "Yeah, we're fine, it was just frustrating," and she returned to work. Later that day Echevarria sent her an email stating:

I thank you for meeting with Lieutenant Williams and myself regarding the conversation that you and I had last week, where I became concerned at the way you were answering my questions and therefore, I wanted to follow up on this to make sure that, not only we are understanding each other, but that you also understand how to address your supervisor. I am satisfied now that we have addressed the issue and I want to remind you not to hesitate to approach me with any issues, question, concerns that you may have. Thank you, Maria.

Canino testified that she did not agree with the statement in his email that now she knows how to address her supervisor and was fearful that it might be used against her in a future situation, so she sent Echevarria an email on July 14 in response:

I am confused and surprised at your statement about my understanding on how to address a supervisor. Not once in my meeting with Lt. Williams or you was that subject ever discussed. My understanding was that the meeting was to clarify consistency with the way supervisors handled situations of canceled details and whether an officer will be paid or not for the full detail time period. I apologize for your concern with my answers to your questions, but I felt I was only reacting to the way you were speaking and questioning me. When I met with Lt. Williams, I never brought up your comments to me because I was under the impression that after 13 days had passed since the date in question, that this was no longer an issue between you and I. I think there is some confusion that we have addressed the issue. What issue are you referring to?

Later that day, Echevarria responded: "Ok, we need to meet again. You me and the lieutenants. I'll be more clear next time, because there are obvious issues that need to be addressed and I

want to do this in person.” Flint and Williams were ccd on this email. On August 5, Echevarria again wrote to Canino stating that because of vacations and weekends, it was difficult to arrange a meeting, but that he, Flint and Canino would all be working on August 15, “so let’s meet and put any and all issues on the table then.” On the following day, Canino sent an email to Echevarria, Williams, Flint, and Kevin McDonnell, a patrolman employed by the Respondent, and the president of the Union, stating that she would be able to attend the meeting and had “. . . reached out to my union representatives and Officer McDonnell has agreed to attend as well.” She testified that she asked McDonnell to attend the meeting with her because she had never previously attended a meeting by herself with two lieutenants and a sergeant and, based upon Echevarria’s email, she was fearful that discipline would result from the meeting.

The meeting took place on August 15 at a table in the rollcall room, an open area where other officers walk through on a regular basis. Lt. Williams began the meeting by asking Echevarria to speak first, and he spoke of what occurred on June 28 and said that Canino yelled at him on that day, and that it was frustrating working with her because she made decisions that she was not supposed to make. At that point, Officer McDonnell asked: “What decisions is she making that she’s not supposed to make?” and Williams cut him off and informed him that he wasn’t allowed to speak. McDonnell said that he was allowed to participate and offered to show him the case law which he had with him, but Williams refused to accept it. McDonnell then said, “Are you ordering me not to speak?” and Williams said that he was. After that, Canino gave her side of the story and Echevarria did the same. After about 30 minutes, Canino said that they should “agree to disagree. Nothing’s being accomplished.” Williams then told her that if a superior tells her to do something, “you need to do it.” Canino then asked if she could defend herself if she felt that she was being disrespected and he said that she could. McDonnell then asked if the meeting was over and was again told that he wasn’t allowed to speak, and the meeting ended. She testified that as best as she can recollect, none of the participants took notes at the meeting. Canino also testified that at no time prior to, or during the meeting was she told that there was no chance that she would be disciplined as a result of the meeting.

McDonnell testified that Canino called him in early August and asked him to attend the August 15 meeting with her. She told him about the June 28 incident and sent him a copy of the above emails, and told him that she did not agree with what he said and thought that the issue had previously been resolved. At the meeting, Williams asked Canino and Echevarria to speak and Echevarria spoke of the June 28 incident and he said that he felt that Canino was making decisions that only sergeants should make. When he said that, McDonnell asked for clarification and Williams told him, “Kevin, you’re not here to speak, you’re only a witness.” He asked Williams if he was ordering him not to actively participate in the meeting, and Williams said that he was. McDonnell offered to show him case law to prove that he could participate, but Williams refused the offer. The conversation between Echevarria and Canino continued for about another 15 minutes and Williams asked Echevarria if he felt that the situation had been resolved, and he said that he did.

At that point, McDonnell asked if that was the end of the discussions of the incident and was again ordered him not to speak, that his role was to sit and not actively participate. That concluded the meeting. During this meeting, Williams had a notebook and pen, but he is not certain whether he took notes at the meeting.

Williams testified that on the afternoon of June 28 he received a call from Echevarria telling him of the incident that morning, and Williams told him to send him an email explaining what occurred in detail. The email referred to some issues of “insubordination” that he was experiencing with Canino, that she “gave him an attitude” during that discussion and that she was making decisions on her own that should be made by supervisors. Echevarria also said in the email that it was often difficult for him to approach her because she always gives an attitude right off the bat and often talks in an accusatory tone. Shortly thereafter, Williams saw Canino and asked her to come into his office to talk. He asked if she knew what he wanted to discuss, and she said that she had an idea that it involved the June 28 incident with Echevarria. He asked her to tell him what happened because Echevarria was upset and frustrated with their interactions. She said that they were both frustrated and he suggested that it would be a good idea if she spoke to Echevarria and cleared it up, and she agreed. Shortly thereafter, Williams saw the emails between Echevarria and Canino and determined: “That there was still confusion. And that there needed to be a clarification because there seemed to be a communication issue.” August 15 was chosen for the date of the meeting because that was the first day that all the participants would be at work at the same time, and the meeting was held in the roll-call room where they conduct meetings, job interviews and training. Neither Williams, Flint, nor Echevarria took notes at this meeting. He did not consider the meeting to be investigatory or a disciplinary meeting and, as far as he understood, no facts were in dispute; discipline was never even considered. At some point in the meeting, McDonnell attempted to say something and he told McDonnell: “Kevin. You’re here as an observer. You’re not here to participate in the meeting.” McDonnell said that he had case law to support his participation, and that he would file an unfair labor practice.

### III. ANALYSIS

Obviously, this case is controlled by *NLRB v. J. Weingarten*, 420 U.S. 251 (1975), where the Court found that Section 7 of the Act creates a statutory right for an employee to refuse to participate in an investigatory interview with the employer without union representation, when he/she reasonably fears that the meeting may result in disciplinary action being taken against him/her. Those “reasonable fears” are to be measured by objective standards considering all the facts of the case. *Weingarten*, supra, fn. 5. The issue therefore is whether Canino, objectively, had a reasonable fear, based upon her conversations with Echevarria and Williams as well as emails from Echevarria, that the meeting on August 15 could result in disciplinary action.

The incident that created the instant situation occurred on June 28, when Canino’s detail was canceled. When she attempted to remain on duty performing other work until her

regular shift began, Echevarria called her back to the station and asked her whether she thought that she could remain at work and she told him that her detail was canceled and she was performing other work. He replied, "You can't just do whatever you want." The next that she heard of the incident was on July 10, when Williams asked her what happened with the "fight" that she had with Echevarria, and that Echevarria was upset and frustrated about it. She told him that she thought that it was just a misunderstanding, and he told her to discuss it with Echevarria on the following day. On the following day, she told Echevarria that she was okay with everything and he responded that he was fine, but "it was just frustrating." Although that should settled the matter, Echevarria sent her an email on the following day stating that he was concerned "at the way you were answering my questions" and wanted to follow up and to "make sure that . . . you also understand how to address your supervisor," although he concluded the email by saying that he was satisfied that they had addressed the issue. Canino, however, was not satisfied with this message and she responded saying that she was confused and surprised by his statement that she did not understand how to address a supervisor. Echevarria responded later that day, with Williams and Flint copied, saying that they needed to meet again, with the Lieutenants and that he would be clearer the next time as "there are obvious issues to be addressed and I want to do this in person." In his email scheduling the meeting for August 15 he said that they would put "any and all issues on the table."

I find that Canino could reasonably have believed that this August 15 meeting might result in some form of discipline and therefore she was entitled to union representation at the meeting. Echevarria questioned whether she knew the proper manner of speaking to her supervisor and after the back and forth of emails he said that they "need" to meet again, with the lieutenants because of "obvious issues that need to be addressed." He scheduled the meeting for August 15, saying that they need to meet again and that Williams and Flint would also be present at the meeting. If he wanted to have a meeting simply to address obvious issues, the appropriate manner of doing so would be for the two of them to meet again. Adding Williams and Flint to the meeting gave Canino reasonable cause to believe that it could result in discipline. Although Williams credibly testified that the August 15 meeting was just for clarification of the communication issue, and that discipline was never considered, that is not dispositive because the issue is whether Canino could reasonably believe that discipline was a possibility, and I find that considering all the facts here, she could. As the Board stated in *Consolidated Edison Co.*, 323 NLRB 910 (1997):

Consequently, it is no answer to this allegation of a *Weingarten* violation that the Respondent's supervisors were only engaged in fact finding, or that they had no intention of imposing discipline on Hunter at the time of the interview. Neither of those conditions is inconsistent with Hunter's reasonable belief that discipline could result from the interview.

Finally, although McDonnell was present at the August 15 meeting, he was not allowed to speak or participate. The law is clear that employees are entitled to the advice and active assistance of their representatives, who "cannot be made to sit si-

lently like a mere observer." *Talsol Corp.*, 317 NLRB 290, 331-332 (1995); *Barnard College*, 340 NLRB 934 (2003); *Washoe Medical Center, Inc.*, 348 NLRB 361 (2006). By denying Canino active representation at the August 15 meeting, the Respondent violated Section 8(a)(1) of the Act.

#### CONCLUSIONS OF LAW

1. The Respondent has been engaged in commerce within the meaning of Section 2(2), (6), and (7) of the Act.

2. The Union has been a labor organization within the meaning of Section 2(5) of the Act.

3. By denying Maria Canino union representation at an investigatory meeting conducted on August 15, at which time she could reasonably believe that discipline could result from the meeting, the Respondent violated Section 8(a)(1) of the Act.

#### THE REMEDY

Having found that the Respondent has engaged in certain unfair labor practices, I find that it shall be ordered to cease and desist therefrom and to take certain affirmative action designed to effectuate the policies of the Act.

On these findings of fact and conclusions of law and on the entire record, I issue the following recommended<sup>2</sup>

#### ORDER

The Respondent, Bentley University, Waltham, Massachusetts, its officers, agents, successors, and assigns, shall

1. Cease and desist from

(a) Denying to any bargaining unit employee the right to be represented on request by Bentley University Public Safety Association (the Union) at an investigatory interview that the employee reasonably believes might result in disciplinary action.

(b) In any like or related manner interfering with, restraining, or coercing employees in the exercise of the rights guaranteed them by Section 7 of the Act.

2. Take the following affirmative action necessary to effectuate the policies of the Act.

(a) Within 14 days after service by the Region, post at its campus in Waltham, Massachusetts, copies of the attached notice marked "Appendix."<sup>3</sup> Copies of the notice, on forms provided by the Regional Director for Region 1, after being signed by the Respondent's authorized representative, shall be posted by the Respondent and maintained for 60 consecutive days in conspicuous places including all places where notices to employees are customarily posted. Reasonable steps shall be taken by the Respondent to ensure that the notices are not altered, defaced, or covered by any other material. In the event

<sup>2</sup> If no exceptions are filed as provided by Sec. 102.46 of the Board's Rules and Regulations, the findings, conclusions, and recommended Order shall, as provided in Sec. 102.48 of the Rules, be adopted by the Board and all objections to them shall be deemed waived for all purposes.

<sup>3</sup> If this Order is enforced by a judgment of a United States court of appeals, the words in the notice reading "Posted by Order of the National Labor Relations Board" shall read "Posted Pursuant to a Judgment of the United States Court of Appeals Enforcing an Order of the National Labor Relations Board."

that, during the pendency of these proceedings, the Respondent has gone out of business or closed the facility involved in these proceedings, the Respondent shall duplicate and mail, at its own expense, a copy of the notice to all current employees and former employees employed by the Respondent at any time since August 15, 2013.

(b) Within 21 days after service by the Region, file with the Regional Director a sworn certification of a responsible official on a form provided by the Region attesting to the steps that the Respondent has taken to comply.

APPENDIX

NOTICE TO EMPLOYEES

POSTED BY ORDER OF THE

NATIONAL LABOR RELATIONS BOARD

An Agency of the United States Government

The National Labor Relations Board has found that we violated Federal labor law and has ordered us to post and obey this notice.

FEDERAL LAW GIVES YOU THE RIGHT TO

Form, join, or assist a union

Choose representatives to bargain with us on your behalf

Act together with other employees for your benefit and protection

Choose not to engage in any of these protected activities.

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WE WILL NOT in any like or related manner interfere with, restrain, or coerce you in the exercise of the rights guaranteed you by Section 7 of the Act.

BENTLEY UNIVERSITY