

**VERMONT LABOR RELATIONS BOARD**

**SOUTH BURLINGTON EDUCATION  
ASSOCIATION, VERMONT-NEA**

**Petitioner.**

**v.**

**SOUTH BURLINGTON SCHOOL  
DISTRICT**

**Respondent.**

**Case No.:** \_\_\_\_\_

**Charge of Unfair  
Labor Practices**

**INTRODUCTION**

The South Burlington Education Association (“SBEA” on “Union”) charges the South Burlington School District (“SBSD” or “Employer”); with violations of 21 V.S.A. § 1726(a)(1), (2) and (3), and 16 V.S.A. § 2001 when it retaliated against SBEA Co-President Beth Adreon for engaging in concerted union activity on behalf of over four hundred of her fellow SBEA members.

**THE PARTIES**

1. The petitioner, South Burlington Education Association, is a labor organization affiliated with Vermont-NEA and the National Education Association. The Association is the exclusive bargaining agent of the teachers employed by SBSD, pursuant to 16 V.S.A. § 1991(a). The Union’s address is c/o Vermont-NEA, 10 Wheelock Street, Montpelier, Vermont 05602-3737.

2. The Respondent, South Burlington School District, is the employer of the teachers at the South Burlington School District, as defined by 16 V.S.A. § 1981(4) & (5). The

South Burlington School District's address is 577 Dorset Street, South Burlington,  
Vermont 05403.

### **JURISDICTION**

3. The Vermont Labor Relations Board has jurisdiction over this matter pursuant to  
21 V.S.A. §§ 1727 and 1735.

## **FACTS**

4. The parties are signatories to a collective bargaining agreement that expired on June 30, 2025.
5. Starting at the end of the 2023-2024 school year, continuing into the 2024-2025 school year, and finishing in January 2025, the Union engaged in a “listening tour” among its members where union leaders and staff met with their colleagues to discuss workplace issues. During this tour, SBEA members overwhelmingly voiced concerns regarding the (now) former Superintendent Violet Nichols and the SBSD Central Office.
6. Superintendent Nichols unsuccessfully attempted to halt the listening tour.
7. At the conclusion of the tour, SBEA members called for Superintendent Nichols’ resignation.
8. During this process, the Union became suspicious that the District was engaged in questionable usages of public funds, which prompted it to make several FOIA requests for SBSD financial records.
9. On June 19, 2025, Executive Director of Educational Support Systems Kristin Romick sent a letter to the editor of *The Other Paper* harshly condemning the SBEA’s efforts during the listening tour and for its request for Nichols’ resignation.
10. Ms. Romick is SBEA Co-President Elizabeth Adreon’s direct supervisor.
11. On July 23, 2025, Superintendent Nichols resigned from the South Burlington School District.
12. On July 24, 2025, Romick filed a complaint against SBEA Co-President Adreon (her direct report) stating that Adreon had been “overbearing and inappropriate professionally with regard to [her] interaction with one or more professional employees by

asking them to sign a self-designated ‘black book’ regarding future transgressions on the part of a central administrator.”

13. On the same date, SBSD notified Ms. Adreon that the complaint would be “investigated in as confidential a manner as possible.”

14. On July 30, 2025, during the public comment section of a South Burlington School Board meeting, Ms. Romick introduced herself in her professional (rather than personal) capacity as the SBSD Executive Director of Educational Support. Romick then spoke of her complaint against “co-president of the SBEA (Elizabeth Adreon)” and asked the school board for an update regarding her complaint.

15. On August 1, 2025, Ms. Adreon received a Freedom of Information (“FOIA”) request for access to, and copies of the “black book” allegedly written in by SBEA members at social gatherings. The FOIA request was signed by outgoing superintendent, Violet Nichols, on her last day of employment with the South Burlington School District.

16. On the same day, Ms. Adreon received a second FOIA request from Journalist Liberty Darr at *The Other Paper*. The request from Darr suggests that Ms. Romick contacted the *Other Paper* regarding the investigation of Ms. Adreon.

17. Before her departure, ousted Superintendent Violet Nichols developed a succession whereby Ms. Romick would take over as acting superintendent in her absence. This plan was approved by the SBSD school board, and Ms. Romick assumed this position at the end of the workday on August 1, 2025.

**CHARGE I: The District has Interfered with, Restrained and Coerced Union President Ms. Adreon by Initiating a Disciplinary Investigation Against Her for Allegedly Engaging in Concerted Activity on Behalf of the SBEA Membership.**

18. Paragraphs 1 – 17 are incorporated herein by reference.

19. Pursuant to 21 V.S.A. § 1726(a)(1) Respondent committed an unfair labor practice by initiating a disciplinary investigation against the Union’s co-president for allegedly engaging in concerted activity such as circulating a “black book” among union members during non-working hours regarding the actions of administrators.

20. Ms. Adreon and the SBEA vehemently denies owning or maintaining this “black book” as referred to by Ms. Romick. However, even if the SBEA/Adreon did own and/or maintain such a book, it would be permissible for them to circulate such a book during non-working hours among union members. In fact, such actions constitute quintessential concerted union activity.

21. SBSD’s investigation of this complaint, even based on the facts<sup>1</sup> as asserted by Romick, is an unfair labor practice.

**CHARGE II: The District is Engaging in Union Animus and Direct Retaliation for Union Activity by Lodging Complaints Against the SBEA President In Response to her Union Activity**

22. On June 19, 2025, Ms. Romick, now Interim South Burlington School District Superintendent, wrote a Letter to the Editor of *The Other Paper* in which she lambasted the Union for their attempted ousting of Superintendent Violet Nichols.<sup>2</sup>

23. The day after Mr. Nichols’ resigned, a resignation that is assumed to be the result of the union’s organizing campaign and request for her departure, Ms. Romick filed a complaint against the union president.

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<sup>1</sup> Which the union claims are untrue.

<sup>2</sup> Romick and Nichols are known to be close personal acquaintances, and Romick has been vocal and public support in her support of Nichols during this process.

24. Romick then also filed FOIA requests to the Union, similar to the ones filed by the Union to the District, assumedly with the knowledge that the Union is not a public entity like the South Burlington School District, and thus not subject to FOIA requests.

25. The clear intent of Romick's actions are to harass, threaten and intimidate the Union president for the work that she did on behalf of her four hundred union members.

26. Not only are the Employer's actions discriminatory they are "inherently destructive," in their anti-union motivation. Ms. Romick, acting Superintendent, made complaints about the union president during public comment at school board meeting for her alleged engagement in protected concerted activity. Ms. Romick has also taken her complaints to the press. Her clear intention is to retaliate against the Union president, instill fear in her, and create a climate of coercion and chilling effect on all SBEA union members. Ms. Romick's actions are a result of her palpable ire that the union was successful in its effort to oust Romick's personal friend and ally, former Superintendent Violet Nichols. Thus, the employer "intend[s] the very consequences which foreseeably and inescapably flow from their actions." *Vermont State Colleges Faculty Fed'n, Local 3180, VFT, AFT, AFL-CIO v. Vermont State Colleges*, 15 VLRB 216, 226-27 (1992), citing *NLRB v. Erie Resistor Corp.* 373 U.S. 221, 228 (1963). In essence, she is demonstrating to union members that they will be punished if they engage in protected concerted activity that offends Ms. Romick's senses. This is at the extreme of indefensible and unlawful conduct under Vermont's labor statutes and VLRB precedent.

**CHARGE III: The District Has Attempted to Dominate and Interfere with the Administration and Formation of the Union by Attempting to Investigate Protected Union Activities**

27. Paragraphs 1 – 16 are incorporated herein by reference.

28. Ms. Romick's complaint and FOIA requests are based on actions and activities during non-working hours and between union members at what she has described union-sponsored events. The Employer has no right to investigate off duty union activities, and to do so is a direct violation of 21 V.S.A. 1726 which prohibits employers from interfering with the administration of a union. Complaints about union activities and actions must be addressed internally through the channels of the union itself, not through an investigation by the employer. A union is not obliged to entertain complaints regarding union activities by non-bargaining unit members.

WHEREFORE, the Association requests the following relief:


1. A declaration that the Respondent's actions as enumerated above are unlawful.
2. A declaration that Respondent has interfered with, restrained and coerced SBEA members and SBEA President Elizabeth Adreon in the exercise of their union rights.
3. A declaration that Respondent has interfered with the administration of the SBEA.
4. A requirement that Respondent post copies of the Labor Relations Board's decision in all of the RCPS schools in places commonly used for communications between it and its employees and the public.
5. An order directing the Respondent to cease and desist its unlawful actions.
6. An order directing Respondent to pay the Association's attorney's fees.

## **CONCLUSION**

For the reasons stated above, the Association requests the Labor Relations Board to conduct a hearing on the merits of this charge, to conclude that the Respondent committed the unfair labor practices as charged, and to provide the relief requested.

Dated at Montpelier, Vermont, this 6<sup>th</sup> day of August 2025.

South Burlington Education Association

By:   
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