

New Jersey Commissioner of Education

Final Decision

V.L., on behalf of minor children, N.D. and D.D.,

Petitioner,

v.

Board of Education of the Borough of Island Heights,
Ocean County,

Respondent.

Synopsis

Petitioner appealed the determination of the respondent Board that her minor children were not entitled to a free public education in the Island Heights School District during the 2020-2021 school year. Petitioner had registered her children in July 2020, stating that the family would be residing with petitioner's mother indefinitely at her home in Island Heights. The Board contended that a subsequent residency investigation revealed that petitioner and the children consistently entered and exited the children's father's home in Toms River and were not living at petitioner's mother's home in Island Heights. The Board filed a counterclaim for tuition for the children's period of ineligible attendance.

The ALJ found, *inter alia*, that: the issue in this case is whether petitioner's children were entitled to enrollment in Island Heights schools for the purpose of receiving a thorough and efficient public education free of charge pursuant to *N.J.S.A. 18A:38-1*; any child between the ages of five and twenty years old is entitled to a free public education in the school district in which he or she is domiciled, *N.J.S.A. 18A:38-1(a)*; here, petitioner acknowledged that she and her children did not live in Island Heights for the period of September 8, 2020 through October 30, 2020; and their intent to move to Island Heights is not consistent with the regulations which require that petitioner and her children be currently domiciled within the school district. The ALJ concluded that petitioner and her children were domiciled in Toms River with the children's father from September 8, 2020 to October 30, 2020, and that the Board is entitled to reimbursement of tuition costs for that period in the total amount of \$8,526.44.

Upon review, the Commissioner concurred with the findings and conclusions of the ALJ and adopted the Initial Decision of the OAL as the final decision in this matter. The petitioner was ordered to reimburse the Board for tuition in the amount of \$8,526.44 for the period from September 8, 2020 to October 30, 2020. The petition was dismissed.

This synopsis is not part of the Commissioner's decision. It has been prepared for the convenience of the reader. It has been neither reviewed nor approved by the Commissioner.

210-21

OAL Dkt. No. EDU 01550-21

Agency Dkt. No. 228-10/20

New Jersey Commissioner of Education

Final Decision

V.L., on behalf of minor children,
N.D. and D.D.,

Petitioner,

v.

Board of Education of the Borough of
Island Heights, Ocean County,

Respondent.

The record of this matter, the Initial Decision of the Office of Administrative Law (OAL), and the exceptions filed by petitioner pursuant to *N.J.A.C.* 1:1-18.4 have been reviewed and considered.¹

Petitioner enrolled her children in the Island Heights school district in July 2020, stating that she and her children would be residing at her mother's home indefinitely. A residency investigation conducted by the district demonstrated that petitioner and the children consistently entered and exited the children's father's home in Toms River, and never entered or exited petitioner's mother's home in Island Heights. The district sent petitioner a notice of removal, and she filed a petition of appeal. Following a hearing, the Administrative Law Judge (ALJ) concluded that petitioner and her children were domiciled in Toms River from September 8, 2020 to October 30, 2020, and that the Board is entitled to reimbursement of tuition costs for that period.

¹ The Board did not file a reply to petitioner's exceptions.

In her exceptions, petitioner argues that the Initial Decision failed to acknowledge petitioner's claims that the Board selectively enforces residency rules on the basis of race and/or disability. Petitioner also takes issue with several alleged inaccuracies in the Initial Decision, including the location and dates of the investigation. Finally, petitioner requests that any calculation of tuition reflect that the period of ineligibility included virtual and half days.

Upon review, the Commissioner concurs with the ALJ's finding that petitioner failed to sustain her burden of establishing that she was a domiciliary of Island Heights from September 8, 2020 through October 30, 2020. Petitioner acknowledged that she and her children did not reside in the district during that time, and their intent to move there is insufficient to establish domicile. In *K.L. v. Board of Education of the Borough of Kinnelon*, 2010 N.J. Super. Unpub. LEXIS 11 (App Div. January 4, 2010), the Appellate Division found that although the petitioners in that case had purchased a home in Kinnelon, they did not reside in the district, as they could not occupy the home during renovations. The court explained:

We think it obvious from these general principles that petitioners and their children were never domiciled in Kinnelon. While they may have possessed a present intention to reside there when the renovations were complete, it is undisputed that petitioners and their children never did reside in the district during the 2007-2008 school year. As such, their intention to do so is irrelevant. They had never established an "actual and physical . . . abode" in Kinnelon, and therefore they lacked the "necessary concurrence of physical presence and an intention to make that place one's home" upon which the legal concept of domicile rests.

[*Id.* at *13-14 (quoting *In re Unanue*, 255 N.J. Supra. 362, 376 (Law. Div. 1991), *aff'd*, 311 N.J. Super. 589 (App Div.), *certif. denied*, 157 N.J. 541 (1998), *cert. denied*, 526 U.S. 1051 (1999)).]

Following this principle, petitioners' argument that they "intended" to live in Island Heights, while actually living in Toms River, lacks merit. Whether or not petitioners hoped to move into Island Heights does not change the fact that they had not taken up an actual and physical abode

in the district. While petitioner's move was allegedly delayed due to the failure of the former tenant of the home to vacate the premises, rather than the need for renovations that was at issue in *K.L.*, the Commissioner does not find that this distinction warrants a different conclusion.

Additionally, as the ALJ found, petitioner and her children were not displaced from the Island Heights address, because they did not live there until November 1, 2020. The inability of petitioner's mother to evict the former tenant due to the Covid-19 eviction moratorium does not equate to a displacement. Accordingly, petitioner has not met the requirements for a finding of family crisis that would permit them to attend school in Island Heights pursuant to *N.J.S.A. 18A:38-1.1*. Because petitioner was not domiciled in Island Heights or experiencing a family crisis, the Commissioner concurs with the ALJ's conclusion that the children were not entitled to a free public education in the district's schools during that time.

Petitioner's exceptions briefly refer to her allegations regarding discrimination by the Board, without further explanation. Having reviewed the pleadings below – in which petitioner claimed that students who are not members of a racial minority reside out of district but have been permitted to enroll in the district – the Commissioner does not find them persuasive. Petitioner acknowledged that she and her children did not reside in the district until November 1, 2020, making the children ineligible for a free public education in the district's schools during that time as a matter of law. The possible treatment of other students by the Board is irrelevant to the conclusions reached herein. Furthermore, the alleged inaccuracies in the Initial Decision listed in petitioner's exceptions are minor and do not change the application of the residency rules or the outcome of this matter.

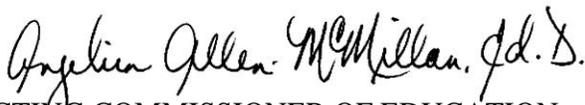
Finally, the Commissioner concludes that there is no basis for a reduction in the tuition reimbursement based on the fact that the school days at issue may have been virtual

and/or half days. Calculation of tuition reimbursement is governed by *N.J.S.A.* 18A:38-1b, and the Commissioner has no discretion to alter that calculation. Moreover, the Commissioner notes that a typical school year often includes a number of half days, a fact of which the legislature was surely aware when it chose not to include any different calculation for half days in the statute.

Pursuant to *N.J.S.A.* 18A:38-1b, the Commissioner shall assess tuition against petitioner for the time period during which the minor children were ineligible to attend school in the district. Therefore, the Board is entitled to tuition reimbursement in the amount of \$8,526.44 for the period from September 8, 2020 through October 30, 2020,² during which time petitioner's minor children were ineligible to attend school in Island Heights.

Accordingly, the Initial Decision of the OAL is adopted as the final decision in this matter. Petitioner is directed to reimburse the Board in the amount of \$8,526.44 for the period from September 8, 2020 through October 30, 2020, for tuition costs incurred during the time period in which N.D. and D.D. were ineligible to attend school in Island Heights. The petition of appeal is hereby dismissed.

IT IS SO ORDERED.³


ACTING COMMISSIONER OF EDUCATION

Date of Decision: October 7, 2021
Date of Mailing: October 7, 2021

² This period totals 38 school days, at a per diem tuition rate of \$112.19 for each child.

³ This decision may be appealed to the Appellate Division of the Superior Court pursuant to *N.J.S.A.* 18A:6-9.1. Under *N.J.Ct.R.* 2:4-1(b), a notice of appeal must be filed with the Appellate Division within 45 days from the date of mailing of this decision.



State of New Jersey
OFFICE OF ADMINISTRATIVE LAW

INITIAL DECISION

**V.L. on behalf of minor
children N.D. and D.D.,**

Petitioner,

v.

**BOROUGH OF ISLAND HEIGHTS
BOARD OF EDUCATION, OCEAN COUNTY,**

Respondent.

OAL DKT. NO. EDU 01550-21

AGENCY DKT. NO. 228-10/20

Matthew J. Lang, Esq., for petitioner

Danielle Panizzi, Esq., for respondent (Cleary, Giacobbe, Alfieri, Jacobs, LLC, attorneys)

Record Closed: July 16, 2021

Decided: August 30, 2021

BEFORE **MARY ANN BOGAN, ALJ:**

STATEMENT OF THE CASE

Petitioner V.L. on behalf of her two children, N.D. and D.D. challenges the decision of respondent, Borough of Island Heights Board of Education, Ocean County (Board), that minor children N.D. and D.D., were non-resident students, and were not eligible to attend school within the Island Heights District (District), pursuant to N.J.S.A. 18A:38-1, and its accompanying regulations, N.J.A.C. 6A:1-1 et. seq. from September 8, 2020 to October 30, 2020. Respondent requests tuition for the days D.D. and N.D. attended the district as non-resident students.

PROCEDURAL HISTORY

On October 28, 2020, V.L. filed a petition with the Commissioner of the New Jersey Department of Education pursuant to N.J.S.A 18A:6-9. On or after November 30, 2020, respondent filed a motion to dismiss in lieu of an answer. This motion was not decided by the Commissioner and was transmitted with the petition on February 11, 2021, to the Office of Administrative Law (OAL) for hearing as a contested case pursuant to N.J.S.A. 52:14B-1 to -15 and N.J.S.A. 52:14F-1 to -13. At the request of the parties a settlement conference took place. Thereafter the hearing took place on July 16, 2021, and the record closed.

FACTUAL DISCUSSION AND FINDINGS

The following facts were undisputed, and I therefore **FIND** the following **FACTS**:

1. On or about May 6, 2020, petitioner, V.L. parent, posted on Facebook, “[d]oes anyone know if there is any administration at the elementary school? I want to get my kids on the out of town waiting list, but when I go to the website, I only see a registration packet not a[n] application. Does anyone know if this is what I would fill out?” (J-1.)
2. On or about July 22, 2020, petitioner submitted an application for enrollment for her children N.D. and D.D. at Island Heights Grade School which stated they reside at [redacted to maintain privacy] Island Heights, and included a letter from her mother, J.L., which states, “This letter is to inform my daughter V.L. and her two sons’ D.D. and N.D. will be residing in my home at [redacted to retain privacy], indefinitely as their main residence.” The packets also indicated the children’s father resided at Bark Street in Toms River. (J-2, J-3, J-4.)
3. The Board initiated a residency investigation which included surveillance of residences at Bark Avenue, Toms River and the Island Heights address. (J-6, 7, 8.)

4. The investigation indicated that N.D. and D.D. consistently entered and exited the home at Bark Street in Toms River during the residency investigation and neither the petitioner nor D.D. or N.D. were observed entering or exiting the home located in Island Heights.
5. On September 22, 2020, the Board issued a preliminary notice of ineligibility and removal to petitioner based upon the results of the residency investigation. (P-9.)
6. On October 14, 2020, the petitioner and the Board participated in the formal residency hearing as to petitioner's residency in the Borough of Island Heights.
7. Petitioner's Jersey Central Power and Light utility bill and a job work order lists the Island Heights home as petitioner's address. (R-11, 12.)
8. Petitioner's New Jersey Department of Motor Vehicle Commission issued driver's license lists a P.O. Box in Island Heights as petitioner's address. (P-13.)
9. On October 15, 2020, the Board issued a Final Notice of Ineligibility stating that D.D. and N.D. are not domiciled in Island Heights and are not eligible for a free public education. (J-14.)
10. On or around November 9, 2020, petitioner submitted to the Board an affidavit that states as of November 1, 2020, petitioner and her children N.D. and D.D. are residing at a home in Island Heights. (J-16.)
11. On August 24, 2020, Ocean County Health Department wrote to petitioner at Bark Street setting forth guidelines for managing the onset of COVID. (J-17.)
12. The per diem rate of tuition for general education students enrolled in the respondent's school district is \$112.19.

13. N.D. and D.D. were ineligible for thirty-eight days of school between September 8, 2020 and October 30, 2020.

TESTIMONY

Timothy Rehm, Superintendent Principal, stated that the District takes at "face value" any and all documents submitted on behalf of incoming students who are registered to attend school in Island Heights. Here a letter submitted on behalf of N.D. and D.D. stated that the students would be living in Island Heights "indefinitely" by the start of the school year. The concern for N.D. and D.D.s' residency started after the school year began when the students and also parent V.L. made statements indicating that they lived outside of the District. An investigation commenced in and around September 17, 2020 and determined that the family did not live in Island Heights. Thereafter the petitioner admitted that the family did not live in Island Heights until November 1, 2020. Mr. Rehm explained the entry in the investigation report dated August 17, 2020, is a typo¹ and should be September 17, 2020. The administrator conducting the investigation did not work in August, and the District did not have a concern about the students' residency as it was not known at that time that there was a question about where they lived.

For Petitioner

Patrick Ferraro is a former subtenant at the Island Heights house from approximately October 2019 to June or July 2020. He entered into a month-to-month lease agreement with the tenant, "Nicole." He stated the owner of the home asked him to move out in the summer 2020 so that V.L. and her children could move in. V.L. and her children did not live in the home during the time that he lived there.

¹ The District's residency determination letter indicates that the investigation took place between August and September 2020.

V.L., mother of N.D. and D.D. testified that the family lives in Island Heights in a home that has been in her family for thirty-four years. She previously lived in Toms River. She wanted to move to Island Heights so that her sons could attend a smaller school. Her mother suggested she could “come home” and live in the home. At that time, “Nicole” a family friend lived there. In and around June or July 2020, V.L.’s mother notified “Nicole” that she could live there until the end of August 2020, so long as she allowed renovation work to take place in the home. The other tenants were notified to leave by July 2020.

V.L. explained that she intended to return to her childhood home in time for the school year. She relied on a work order dated August 27, 2020 and an electric bill for services at the Island Heights home dated July 15, 2020 in her name, to demonstrate her intent to live there. Near the end of August 2020, she learned that “Nicole” refused to leave the home by the end of the month. The move was also delayed because at the beginning of August 2020 she was diagnosed with COVID-19.

She never suspected a residency issue until in and around mid-September when she learned that her son was “interrogated” about where he lived. Then on September 22, 2020, she received a letter of ineligibility from the District. That same day, she asked Mr. Rehm if she could have thirty days to get the tenant to leave the home. She also asked the tenant to allow her to move in and sublet rooms, but the tenant did not agree.

V.L. acknowledged that she began living in Island Heights on November 1, 2020. She informed the District that she had no intention of changing her driving license or mailing address that has the Toms River address because she does “not have time,” it is “easier” to get the mail in Toms River because otherwise she would need to “track” her mother down to get the Island Heights mailbox key, and she had “no intention” of severing ties with her Toms River home. The delay in moving to Island Heights was caused by the tenant. She “planned” to live there, she bought supplies to renovate the property and she arranged for furniture delivery.

She acknowledged that her Facebook posts states “I am in Silverton with Dan and the kids. Looking for home in Island Heights but could not find a pool not necessary but want to find

my own home.” She also posted that she bought the house for a “steal” and was reluctant to purchase because of the price. She continues to look for new homes “all the time.”

Petitioner thinks she completed the “Choice” paperwork application, but the school did not have seats in the grade her son was attending.

J.L., mother of V.L., owns the home in Island heights where her daughter currently resides with N.D. and D.D. In the beginning of June 2020 she started talking about V.L. moving in. At that time a tenant named “Nicole” lived in the home along with two subtenants, she later learned. “Nicole” paid \$1,000 per month plus utilities. At that time she told Nicole that she needed to go back home and they needed to leave, by September 1, 2020 so her daughter could live in the home by September. There was some “push back” and then she learned that due to COVID “my hands were tied.” She could not evict the tenant and V.L. could not gain access to the home by the start of the school year.

LEGAL ANALYSIS AND CONCLUSIONS

The issue is whether petitioner’s children N.D. and D.D. were entitled to be enrolled in the Borough of Island Heights School District for purposes of receiving a thorough and efficient public education free of charge pursuant to N.J.S.A. 18A:38-1. If not, should the respondent’s request for tuition reimbursement for thirty-eight days at the beginning of the 2020-2021 school year be granted.

Any child between the ages of five and twenty years old is entitled to a free public education in the school district in which he is domiciled. N.J.S.A. 18A:38-1(a); N.J.A.C. 6A:22-3.1(a). See, V.R. ex rel A.R. v. Hamburg Bd. of Educ., 2 N.J.A.R. 283, 287 (1980), aff’d, State Bd., 1981 S.L.D. 1533, rev’d on other grounds sub nom.; Rabinowitz v. N.J. State Bd. of Educ., 550 F. Supp. 481 (D.N.J. 1982) (New Jersey requires local domicile, as opposed to mere residence, in order for a student to receive a free education).

The domicile of an unemancipated child is that of his parent, custodian or guardian. Somerville Bd. of Educ. v. Manville Bd. of Educ., 332 N.J. Super. 6, 12 (App. Div. 2000), aff'd, 167 N.J. 55 (2001); P.B.K. o/b/o minor child E.Y. v. Board of Ed. of Tenafly, 343 N.J. Super. 419, 427 (App. Div. 2001). A child may also be considered domiciled in a school district if he lives with an adult domiciled in that school district, as long as the child is financially supported by that adult as if he were their own child, upon submission of a sworn affidavit to the board of education. N.J.S.A. 18A:38-1(b)(1).

The acts, statements and conduct of the individual, as viewed in the light of all the circumstances, determine a person's true intent. Collins v. Yancey, 55 N.J. Super. 514, 521 (Law Div. 1959). The parent, or in this case, petitioner V.L., has the burden of proof by a preponderance of the evidence. N.J.S.A. 18A:38-1(b)(2).

When a local board determines that a child is not properly domiciled in its district, N.J.S.A. 18A:38-1(b)(2) provides a right of appeal for the parents as follows:

The parent or guardian may contest the Board's decision before the Commissioner within 21 days of the date of the decision and shall be entitled to an expedited hearing before the Commissioner and shall have the burden of proof by a preponderance of the evidence that the child is eligible for a free education under the criteria listed in this section.

A student's "domicile" is where the student's parent or guardian has a permanent home in the school district such that "the parent or guardian intends to return to it when absent and has no present intent of moving from it, notwithstanding the existence of homes or residences elsewhere." N.J.A.C. 6A:22-3.1(a)(1); State v. Benny, 20 N.J. 238, 250 (1955); In re Unanue, 255 N.J. Super. 362, 374 (Law Div. 1991), aff'd, 311 N.J. Super. 589 (App. Div.), certif. denied, 157 N.J. 541 (1998); cert. denied, 526 U.S. 1051, 119 S. Ct. 1357, 143 L. Ed. 2d 518 (1999).

When a person arguably has more than one residence, there are factors to consider in determining his or her domicile: the physical characteristics of each place; the time spent and the things done in each place; the other persons found there; the person's mental attitude

towards each place; and whether or not there was an intention, when absent, to return to that address. Mercadante v. City of Paterson, 111 N.J. Super. 35, 39–40 (Ch. Div. 1970), aff'd, 58 N.J. 112 (1971). “[A] choice of domicile by a person, irrespective of his motive, will be honored by the court, provided there are sufficient objective indicia, by way of proofs, supporting the actual existence of that domicile.” In re Unanue.

In the within matter, petitioner acknowledged that she and her children did not reside within the Borough of Island Heights during the period of September 8, 2020 through October 30, 2020. Their intent to move into Island Heights is not consistent with the regulation which requires that the petitioner and her children be currently domiciled in the District and when absent intend to return to the home located in the District. Moreover, intention when absent to return to the home located in the District that was once a childhood home does not satisfy the regulatory requirement even when the home is owned by a petitioner’s parent.

Based on N.J.A.C. 6A:22-3.1(a)(1) and the analyses in State v. Benny, and In re Unanue, if the Toms River address is where petitioner returned to on a daily basis, and where petitioner resided with her husband, as well as with her two children, then petitioner was domiciled in Toms River from September 8, 2020 to October 30, 2020. As unemancipated children, N.D. and D.D.’s domicile would be the same as their parents. Somerville Bd. of Educ. v. Manville Bd. of Educ.,

Petitioner’s assertion that the COVID-19 pandemic caused the family to be *displaced* because they were unable to evict the tenant from the property due to Governor Murphy’s Executive Order prohibiting the eviction of a tenant from residential property is unconvincing. The regulation addressing displaced families is inapplicable to the facts herein. In accordance with

N.J.A.C. 6A:22-3.2

- (h) a student who is not considered homeless... and who moves to a new school district during the academic year as a result of a family crisis shall be permitted to remain enrolled in the original

school district of residence for the remainder of the school year without the payment of tuition.

1. For purposes of this subsection, "family crisis" shall include, but not be limited to:
 - iii. An unplanned displacement from the original residence such as fire, flood, hurricane, or other circumstances that render the residence uninhabitable.

Here the family was not "displaced" from the home located in the Borough of Island Heights because they were not domiciled in that home.

Accordingly, I **CONCLUDE** by a preponderance of the credible evidence that petitioner and her children N.D. and D.D., were domiciled in the Borough of Toms River from September 8, 2020 to October 30, 2020. Therefore, N.D. and D.D. were ineligible to receive a free public school education in the Borough of Island Heights during that time period.

The respondent Board of Education asserts that it is entitled to be reimbursed for tuition for the period of N.D. and D.D.'s ineligible enrollment in its school. When, as here, the evidence does not support the petitioner's claim for a free public education, the Commissioner of Education is authorized to assess tuition pursuant to N.J.A.C. 6A:22-6.2(a), which provides as follows:

If in the judgment of the Commissioner the evidence does not support the claim of the resident, he shall assess the resident tuition for the student prorated to the time of the student's ineligible attendance in the school district. Tuition shall be computed on the basis of 1/180 of the total annual per pupil cost to the local district multiplied by the number of days of ineligible attendance and shall be collected in the manner in which orders of the Commissioner are enforced.

N.J.S.A. 18A: 33-1(b) similarly requires that tuition be calculated on the basis of 1/180 of the total annual per pupil cost to the district multiplied by the number of days of ineligible attendance.

Out-of-District tuition for N.D. and D.D.'s attendance at Island Heights School District was \$112.19 per day, for thirty-eight days, for a total of \$8,526.44.

Based upon the facts and the legal principles cited above, I **CONCLUDE** that respondent is entitled to reimbursement for the costs of tuition in the amount of \$8,526.44.

ORDER

It is hereby **ORDERED** that respondent's determination that petitioner's children were ineligible for a free education in the Borough of Island Heights for the time period of September 8, 2020 through October 30, 2020, is hereby **AFFIRMED**.

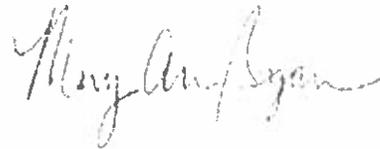
It is **ORDERED** that petitioner, V.L., pay to respondent, the Board of Education of the Borough of Island Heights, tuition in the amount of \$8,526.44, for the time period of September 8, 2020 through October 30, 2020.

Petitioner's appeal is **DISMISSED**.

I hereby **FILE** this initial decision with the **COMMISSIONER OF THE DEPARTMENT OF EDUCATION** for consideration.

This recommended decision may be adopted, modified or rejected by the **COMMISSIONER OF THE DEPARTMENT OF EDUCATION**, who by law is authorized to make a final decision in this matter. If the Commissioner of the Department of Education does not adopt, modify or reject this decision within forty-five days and unless such time limit is otherwise extended, this recommended decision shall become a final decision in accordance with N.J.S.A. 52:14B-10.

Within thirteen days from the date on which this recommended decision was mailed to the parties, any party may file written exceptions with the **COMMISSIONER OF THE DEPARTMENT OF EDUCATION, ATTN: BUREAU OF CONTROVERSIES AND DISPUTES, 100 Riverview Plaza, 4th Floor, PO Box 500, Trenton, New Jersey 08625-0500**, marked "Attention: Exceptions." A copy of any exceptions must be sent to the judge and to the other parties.



August 30, 2021

DATE

MARY ANN BOGAN, ALJ

Date Received at Agency:

August 30, 2021

Date Mailed to Parties:

August 30, 2021

MAB/nd

APPENDIX

WITNESSES

For Petitioner:

V.L.

J.L.

For Respondent:

Timothy Rehm

EXHIBITS

Joint Exhibits:

- J-1 Facebook Post from V.L., dated May 6, 2020
- J-2 Letter from J.L., re: [redacted] Vansant Avenue and attachment, dated July 22, 2020
- J-3 School Registration Packet-N.D., dated July 22, 2020
- J-4 School Registration Packet-D.D., dated July 22, 2020
- J-5 Letter from T. Rehm to V.L. re: Parental Access to Student Records, Attendance at Activities, dated August 6, 2020
- J-6 Emails from T. Reham, E. Smutz, J. Mekles, and C. Thomas re: residency investigation, dated September 17, 2020