

***Before the School Ethics Commission
OAL Docket No.: EEC-09630-20
SEC Docket No.: C07-20
Final Decision***

***In the Matter of Sudhan Thomas and Regina Robinson,
Jersey City Board of Education, Hudson County,
Respondents***

I. Procedural History

The above-captioned matter arises from a Complaint that was filed with the School Ethics Commission (Commission) on February 11, 2020, by Matthew Schapiro (Complainant), a former member of the Jersey City Board of Education (Board), alleging that the Business Administrator Regina Robinson (Respondent Robinson) and the Board President Sudhan Thomas (Respondent Thomas) (collectively, Respondents), violated the School Ethics Act (Act), *N.J.S.A. 18A:12-21 et seq.* More specifically, the Complaint avers that Respondent Robinson and Respondent Thomas violated *N.J.S.A. 18A:12-24(c)*, and that Respondent Thomas violated *N.J.S.A. 18A:12-24.1(a)* of the Code of Ethics for School Board Members (Code).

At its meeting on June 23, 2020, and after reviewing Respondent Robinson's Motion to Dismiss in Lieu of an Answer (Motion to Dismiss) and allegation of frivolous filing, Respondent Thomas' Motion to Dismiss and allegation of frivolous filing, as well as Complainant's response to both Motions to Dismiss and allegations of frivolous filing, the Commission adopted a decision finding that the Complaint was timely filed, denying the Motions to Dismiss in their entirety, finding the Complaint was not frivolous and denying Respondents' requests for sanctions. Based on its decision, the Commission directed Respondents to file an Answer to Complaint (Answer), and on June 25, 2020, and July 17, 2020, respectively, Respondent Robinson and Respondent Thomas did so.

Thereafter, at its meeting on September 29, 2020, the Commission voted to find probable cause for all of the allegations in the Complaint. Based on its finding of probable cause, the Commission voted to transmit the within matter to the Office of Administrative Law (OAL) for a hearing.

At the OAL, the parties filed cross-motions for summary decision, which the Administrative Law Judge (ALJ) denied. Thereafter, following a plenary hearing, the ALJ issued an Initial Decision on June 17, 2024, concluding that Respondents Robinson and Thomas did not violate *N.J.S.A. 18A:12-24(c)*, Respondent Thomas did not violate *N.J.S.A. 18A:12-24.1(a)*, and dismissing the matter. Petitioner filed exceptions to the Initial Decision, in accordance with *N.J.A.C. 1:1-18.4*, and Respondents filed separate replies thereto.

At its meeting on August 27, 2024, the Commission discussed the above-captioned matter, and at its meeting on September 24, 2024, the Commission voted to adopt the Initial

Decision's findings of fact, the legal conclusions that Respondents Robinson and Thomas did not violate *N.J.S.A.* 18A:12-24(c) and Respondent Thomas did not violate *N.J.S.A.* 18A:12-24.1(a), and the dismissal of the above-captioned matter.

II. Initial Decision

This matter arose after Complainant tendered his letter of resignation from his position as a Board member to Respondent Robinson during a May 31, 2019, Board meeting. *Initial Decision* at 3. The handwritten letter stated that he was resigning, effective July 15, 2019, but that "In accordance with [election law] N.J.S.A. 19:]60-7, please inform the County Clerk by 6/3 that my position will be on the ballot November 5th, 2019." *Ibid.* Thereafter, within "minutes," Respondent Robinson sent a text message to Respondent Thomas and the Interim Superintendent, stating "Schapiro just handed me his resignation notice," and Respondent Thomas replied, "Good riddance to garbage." *Ibid.* According to Complainant's testimony, he was advised by the New Jersey School Boards Association (NJSBA) that the effective date of his resignation must be by the third Monday in July (July 15, 2019) in order to be placed on the November 2019 ballot. *Id.* at 9. Additionally, prior to the submission of Complainant's resignation letter, a May 2, 2019, news article indicated that he would be resigning in July as his family was relocating to California, and that in November 2019, voters would choose who remains in the seat for the final year of the term. *Id.* at 5.

On June 3, 2019, Respondent Robinson emailed Board counsel, and copied Respondent Thomas, "seeking clarification about [Complainant's] reference to June 3 in his resignation letter." *Id.* at 4. Board counsel advised Respondent Robinson not to notify the Board until after the resignation "effective date" of July 15, 2019, because Complainant could rescind his resignation up until the effective date. *Ibid.* As such, Complainant's resignation was not announced to the remainder of the Board until July 22, 2019, when the Board accepted his resignation. *Ibid.*

Regarding Board vacancies, Respondent Robinson sent an email to Board counsel on June 14, 2019, and copied Respondent Thomas, attaching a proposed notice of the vacant Board seats for the November election. *Ibid.* Despite Complainant's request that his seat be placed on the November ballot, Respondent Robinson forwarded notices to the Hudson County Clerk's office that included one vacant seat, but did not include Complainant's seat. *Ibid.* Respondent Robinson testified that 2019 was her first year of involvement with certifying vacant Board seats to the Board of Elections. *Id.* at 12.

On July 30, 2019, Respondent Robinson "posted a public notice for a Board appointment to the vacant seat created by [Complainant's] resignation, with the Board to conduct applicants' interviews at its August 26, 2019," Board meeting. *Id.* at 4. The ALJ maintains that Complainant's seat was "filled by the Board's interim appointment of an applicant who received a majority of the votes of the remaining Board members, and that appointment would not expire until January 2021." *Ibid.* Accordingly, the successful candidate would have the seat for approximately 16 months, rather than only several months if the vacant seat was placed on the 2019 ballot. *Id.* at 5.

On August 6, 2019, Anthony Sharperson and David Czehut, candidates for a vacant seat, filed an action in the Hudson County New Jersey Superior Court against the Hudson County Clerk, “challenging the exclusion of [Complainant’s] unexpired term from the 2019 election ballot.” In that matter, the judge found that Respondent Robinson should have disclosed the letter of resignation to the Board, as it was submitted at a public meeting, and “[t]he fact that the Board chose not to take any action from May 31 until July 22 I do not believe should impede the statutory requirement that the vacancy should be filled by an election and not by an appointment of the Board.” (DOE 414). As such, the judge ordered that the County Clerk is “restrained from printing or otherwise publishing the ballots for the November 5 election without first placing [Complainant’s] unexpired term thereon.” (DOE 417).

Ultimately, the Board appointed a replacement for Complainant until the January 2020 reorganization meeting as the vacant seat was placed on the November 2019 ballot. *Initial Decision* at 15-16. The person appointed by the Board was elected to Complainant’s seat for the remainder of his term, and Respondent Thomas lost his bid for reelection. *Id.* at 7, 16. Thereafter, on February 11, 2020, Complainant filed this ethics complaint against Respondent Thomas and Respondent Robinson alleging that they violated school election law, as well as education law, asserting that both Respondents “kept secret the news of a resigning [B]oard trustee in order to prevent an election from occurring for the unexpired term of the resigned [B]oard member” in violation of *N.J.S.A.* 18A:12-24(c), and that Respondent Thomas also violated *N.J.S.A.* 18A:12-24.1(a). *Id.* at 7.

The ALJ found that Complainant and Respondent Thomas had a “difficult relationship on the Board,” and Complainant had a “difficult relationship with the entire Board and with the public.” *Id.* at 16. Additionally, the ALJ noted that Complainant “was suspicious” that Respondent Thomas would attempt to fill his vacant seat with an appointee of his own choosing to solidify the ideology of the Board. *Ibid.* However, the majority of the Board, not Respondent Thomas alone, appointed the individual who ultimately won the vacant seat in the November 2019 election. *Ibid.* As such, the ALJ found “there is simply no credible evidence” of any collusion between Respondents, that Respondent Robinson acted in bad faith or for “nefarious” reasons in handling Complainant’s resignation, or that Respondent Robinson “controlled” the Board or Respondent Thomas controlled Respondent Robinson. *Id.* at 16-17.

As to a violation of *N.J.S.A.* 18A:12-24.1(a), the ALJ concluded that a “final decision from [a] court of law” was not provided as it relates to Respondent Thomas, because the Superior Court election matter involved Respondent Robinson’s conduct, and Respondent Thomas was not a party. The ALJ further concluded that “there is simply no competent credible evidence that [Respondent] Thomas ‘brought about’ any ‘changes’ to the Board’s policies and procedures concerning the disclosure of [a] Board members’ prospective resignations to the Board” or that Respondent Thomas participated in Respondent Robinson’s decision not to certify Complainant’s seat as vacant.

Regarding a violation of *N.J.S.A.* 18A:12-24(c), as it relates to both Respondents, the ALJ concluded that Respondent Thomas “did not ‘decide[] whether [Complainant’s] vacant Board seat should be disclosed to the [County] Clerk and/or placed on the [November 2019] ballot.’” Further, “such a ‘decision’ by [Respondent] Thomas did not ‘create[] some benefit to

[him], including control over the individual who would be appointed to fill the vacancy.” The ALJ further concluded that although Respondent Robinson “decided whether [Complainant’s] vacant Board seat should be disclosed to the County Clerk,” based on her duty and counsel’s advice, that decision did not “create [] some benefit to [Respondent Robinson], including control over the individual who would be appointed to fill the vacancy.”

Therefore, the ALJ found that Petitioner did not prove any of the violations alleged against Respondents, and that “no reasonable member of the public would believe otherwise.” Accordingly, the ALJ found that a penalty should not be imposed and ordered that the Complaint be dismissed.

III. Exceptions

Petitioner’s Exceptions

Petitioner initially argues that the “ALJ’s findings and conclusions of law are unsupported by the factual record developed and the reasonable person standard that is required to assess violations under the [Act] and the [Code].” Therefore, the Commission should “reject the ALJ’s initial decision, find that both Respondents Thomas and Robinson violated the Act, and that Thomas also violated the Code, and issue a penalty of censure for Thomas and a penalty of removal for Robinson.”

As to a violation of *N.J.S.A.* 18A:12-24(c), Petitioner maintains “evidence of an actual conflict of interest” is not required, but instead “the operative question is whether there existed the potential for conflict and ‘whether the circumstances could reasonably be interpreted to show that they had the capacity to tempt the official to depart from [his or her] sworn public duty.’” According to Petitioner, the ALJ determined that neither Respondent violated this provision “but her findings were based on her determination that there was a lack of evidence of actual collusion, acts of bad faith, or other ‘nefarious’ means.” However, that is not the correct standard, because a violation of the Act is based on “what a reasonable member of the public would believe, not on what a school official may have intended.”

Here, the ALJ determined that Respondent Thomas did not “participate” in the decision to withhold the vacant seat nor “decide” whether the vacant seat “should be disclosed to the County Clerk and/or placed” on the ballot and even if he did participate in that decision, it did not create any benefit to him; however, this determination is “belied by the record.” Petitioner notes that Respondent Thomas “was fully aware of [Complainant’s] resignation from the very night it occurred, on May 31, 2019, including the effective date of [Complainant’s] resignation, after Robinson informed him.” Furthermore, Respondent Thomas “deliberately withheld this information from the remainder of the Board,” until July 22, 2019, “which changed the manner of filling the unexpired term from election to appointment.” Moreover, Petitioner notes that the reasoning as to why the “remainder of the Board was not informed about [Complainant’s] resignation for nearly two months was based on the flawed legal premise that [Complainant’s] resignation could not be effective until the Board formally ‘accepted’ it.” Nonetheless, Respondent Thomas had “multiple opportunities to add [Complainant’s] resignation to a number of Board meetings between May 31, 2019 and July 22, 2019.” Therefore, “this undisputed record

demonstrates that [Respondent] Thomas deliberately and consciously refrained from taking any action on [Complainant's] resignation," and there is no question he violated *N.J.S.A.* 18A:12-24(c).

As to Respondent Robinson, a "reasonable member of the public could believe that her judgment was impaired by acting in a manner that would protect herself and her employment situation vis-à-vis [Respondent] Thomas' position of authority over her." Petitioner argues the Superior Court judge confirmed that Respondent Robinson "had an obligation to advise the entire Board of the resignation prior to July 15, 2019." Moreover, the judge found that Respondent Robinson failed to comply with *N.J.S.A.* 18A:12-15(f) and *N.J.S.A.* 19:60-7, and therefore, "there is absolutely no question" that she violated *N.J.S.A.* 18A:12-24(c). Petitioner reasserts that Respondent Robinson knew about the resignation the moment she received Complainant's notice, did not notify the entire Board, and had "an obligation to certify the correct number of seats to the County Clerk." According to Petitioner, Respondent Robinson's employment "is up for renewal every year and it is reasonable to believe that an unfavorable standing with the Board President could negatively impact her rehiring." Petitioner avers that Respondent Robinson's "support and cooperation" could help Respondent Thomas' cause, and conversely her defiance could negatively impact her employment, and therefore, a "reasonable person viewing the circumstances at issue could easily conclude that a conflict of interest was created on this basis alone."

Regarding a violation of *N.J.S.A.* 18A:12-24.1(a) as to Respondent Thomas, Petitioner argues "all that needs to be considered is whether, through factual evidence from any final decision, any law, rule or regulation, or court order pertaining to schools was not upheld." Petitioner argues, contrary to the ALJ's determination, a violation of Code, "does not require any showing of 'collusion' or that [Respondent] Thomas would have control over the individual who would be appointed to [Complainant's] unexpired term." Moreover, the ALJ further incorrectly determined that the Superior Court matter did not involve Respondent Thomas. According to Petitioner, the probable cause notice indicates that it is "irrelevant whether [Respondent] Thomas was named as a party to the Superior Court proceedings." In addition, "there is ample evidence demonstrating that [Respondent] Thomas 'participated in the decision' to withhold Complainant's vacant seat on the ballot." Petitioner asserts that Respondent Thomas participated in the decision to withhold Schapiro's expired term "because he was the *only Board member* with knowledge of the resignation," the "*only Board member* who could begin the 'process' of accepting [Complainant's] resignation under this legal theory," he acknowledged his role in "developing and placing matters on each Board meeting agenda[.]" and he acknowledged the "vacancy needed to be accepted by the Board." Yet, despite this, he did not place the resignation on any Board agendas from May through July, and therefore, Respondent Thomas participated in the decision to withhold the vacant seat from the ballot in violation of *N.J.S.A.* 18A:12-24.1(a).

As to penalty, Petitioner argues that Respondents "engaged in conduct that fell far short of the standards required of school officials. Tampering with elections in any manner cannot be tolerated, including the perception of election tampering. Respondents were fully aware of their ethical and statutory obligations as school officials, but instead withheld information from the Board and concocted erroneous interpretations of the relevant statutory requirements to circumvent their compliance with them." Petitioner also argues that Respondents have failed to

establish that the mitigating factor of reliance on the advice of counsel. Therefore, Petitioner contends that Respondent Thomas should receive no less than a censure as he is no longer a Board member, and Respondent Robinson should receive no less than removal because their “actions constitute a serious violation of the public trust that call for a penalty.”

Respondent Thomas’ Reply to Petitioner’s Exceptions

Respondent Thomas maintains that the ALJ properly found that he did not violate the Act. According to Respondent Thomas, in order to sustain a violation of *N.J.S.A.* 18A:12-24(c), Petitioner needed to prove that Respondent Thomas “was somehow responsible, directly or indirectly, for manipulating the November ballot to secure some political advantage.” However, the evidence does not demonstrate that Respondent Thomas “did anything he should not have done, or refrained from doing anything that he should have done,” as the Board President is not involved in the process of notifying the Board of a resignation or certifying a vacant seat to the County Clerk. Respondent Thomas maintains that even if there was evidence that he was involved with reporting to the County Clerk, which he was not, “the record is also clear the issue was handled under the active guidance of the Board’s attorney . . . and it was his advice upon which Robinson exclusively relied in conducting herself in this matter.” Furthermore, Respondent Thomas argues that “there was nothing in [the Superior Court judge’s] decision from which it could be inferred that Thomas himself violated any legal duty or ethical obligation, or even had any duties or obligations that were triggered by [Complainant’s] resignation.” Respondent Thomas claims, ultimately, “[t]o be a ‘**reasonable**’ observer,’ one must also be presumed to know the relevant facts – in this case, that the Board attorney had advised that there was nothing for the Board to do until the effective date of [Complainant’s] resignation had passed.”

As to the ALJ’s determination regarding a violation of *N.J.S.A.* 18A:12-24.1(a), Respondent Thomas contends, “[t]he only ‘final decision’ presented in this case was [the Superior Court judge’s decision] . . . but nothing in that decision meets the criteria of *N.J.A.C.* 6A:28-6.4(a)(1).” Per Respondent Thomas, the main focus of the Superior Court matter was Respondent Robinson’s handling of the resignation letter. Respondent Thomas was not a party to that matter, and therefore, Respondent Thomas maintains there are no allegations that he did anything wrong or unlawful.

Respondent Robinson’s Reply to Petitioner’s Exceptions

Respondent Robinson argues that contrary to Petitioner’s claim that Respondent Robinson was protecting “herself and her employment situation vis-a-vis Thomas’ position of authority over her,” Respondent Thomas does not have any legal authority or control over Respondent Robinson’s employment. The Superintendent makes employment recommendations, and although the Board must approve such recommendations, Respondent Thomas is only one Board member. Respondent Robinson further argues that Petitioner did not provide any evidence to support that Respondent Robinson controlled the Board, that Respondent Thomas controlled Respondent Robinson, nor that either Respondent controlled the agenda. Respondent Robinson concurs with the ALJ’s finding that “there is simply no credible evidence of any collusion between” the Respondents, and there also is “no evidence that Robinson acted in bad faith or for

‘nefarious’ reasons in handling [Complainant’s] resignation.” Therefore, Respondent supports the ALJ’s decision that she did not violate *N.J.S.A.* 18A:12-24(c) because she did not receive any benefit.

Respondent Robinson reaffirms her reliance on Board counsel’s advice and notes that she received Complainant’s resignation on Friday, May 31, 2019, and the following Monday, June 3, 2019, she contacted Board counsel requesting his advice on how to handle the matter. Respondent states she needed “clarity” on a statute to make sure she was complying with the law, and Board counsel advised that the Board “should not be advised of the resignation until the effective date” and that there “was nothing [she] needed to do at that time.” Respondent Robinson contends that she “fully disclosed all facts and circumstances” surrounding Complainant’s resignation to Board counsel, including a copy of the resignation letter, and Board counsel provided advice related thereto.

IV. Analysis

Upon a thorough, careful, and independent review of the record, the Commission adopts the ALJ’s factual findings, the legal conclusions that Respondents Robinson and Thomas did not violate *N.J.S.A.* 18A:12-24(c) and Respondent Thomas did not violate *N.J.S.A.* 18A:12-24.1(a), and the dismissal of this matter.

N.J.S.A. 18A:12-24(c) prohibits school officials from acting in their official capacity in any matter where they, or a member of their family, or a business organization in which they have an interest, has a direct or indirect financial involvement that might reasonably be expected to impair their objectivity or independence of judgment. Additionally, *N.J.S.A.* 18A:12-24(c) also prohibits school officials from acting in their official capacity in any matter when they or a member of their family has a personal involvement that is or creates some benefit to the school officials or member of their immediate family. The probable cause notice indicated that if Respondents, in their official capacities, “decided whether Complainant’s vacant Board seat should be disclosed to the County Clerk and/or placed on the upcoming ballot, and that they had a direct or indirect financial involvement or a personal involvement in that decision-making process that created some benefit to them, including control over the individual who would be appointed to fill the vacancy,” a violation of *N.J.S.A.* 18A:12-24(c) may be established.

With respect to Respondent Thomas, the Commission finds that the facts and evidence deduced at the hearing in this matter fail to demonstrate that he played a role in the decision not to certify Complainant’s vacant seat to the County Clerk to be placed on the November 2019 ballot. While Respondent Thomas was aware that Complainant had submitted a resignation letter, his knowledge of Complainant’s vacant seat does not establish that he acted in his official capacity to make the decision regarding certification of the vacant seat and/or exert influence over Respondent Robinson’s decision-making process. Additionally, while Petitioner argues that Respondent’s Thomas’ ability to appoint a Board member for more than a year instead of a few months until the election would provide a benefit to Respondent, the Commission notes that a Board appointment is a decision that is made by the entire Board, of which Respondent Thomas is just one vote, and therefore, the benefit it would provide to Respondent Thomas is uncertain. However, regardless of whether voting on the appointment of a Board member could arguably

constitute a benefit, a violation of *N.J.S.A. 18A:12-24(c)* has not been established because Respondent Thomas did not take action in his official capacity regarding certification of the vacant seat.

As to Respondent Robinson, the Commission finds that although she failed to certify Complainant's vacant seat to the County Clerk, the evidence does not demonstrate that Respondent Robinson had a financial or personal involvement in the matter or that it impaired her judgment or created a benefit to her. Respondent Robinson, as the Business Administrator, does not play a role in appointing Board members; she is not a Board member and does not have a vote. Petitioner's argument that Respondent Robinson's conflict stems from the fact that her employment is up for renewal each year, and enabling the Board to appoint a member for a longer period of time would place her in good graces with the Board President, is speculative. The Superintendent, not the Board President, recommends the Business Administrator's employment, and the entire Board, not just the Board President, approves those recommendations. Additionally, the evidence does not establish that the Board President had influence over Respondent Robinson or her decisions. Accordingly, a violation of *N.J.S.A. 18A:12-24(c)* has not been established.

In accordance with *N.J.S.A. 18A:12-24.1(a)*, Board members must uphold all laws, rules and regulations of the State Board of Education, and court orders pertaining to schools, and desired changes must be brought about only through legal and ethical procedures. Pursuant to *N.J.A.C. 6A:28-6.4(a)(1)*, in order to demonstrate a violation of *N.J.S.A. 18A:12-24.1(a)*, factual evidence must include a copy of a final decision from any court of law or administrative agency of this State demonstrating that the board member failed to enforce all laws, rules and regulations of the State Board of Education, and/or court orders pertaining to schools or that the board member brought about changes through illegal or unethical procedures. Regarding Respondent Thomas, the Commission notes that the Superior Court decision regarding certification of Complainant's unexpired term on the November 2019 ballot did not implicate Respondent Thomas. While the decision indicates that Respondent Robinson should have disclosed the letter of resignation to the Board and certified the vacant seat, the decision does not demonstrate that Respondent Thomas violated the law. Further, as discussed above, the evidence does not demonstrate that Respondent Thomas played a role in or had any responsibility for the decision not to certify Complainant's vacant seat to the County Clerk. Without such a decision or determination, a violation of *N.J.S.A. 18A:12-24.1(a)* cannot be established.

Accordingly, the Commission agrees with the ALJ that this matter should be dismissed.

As a final note, the Commission asserts that although the evidence in this matter did not ultimately support a violation of the Act, the parties should be reminded that the purpose of being a school official involves students and their education, and when school officials focus on power and control of the Board, they lose sight of the children that they have a duty to support.

IV. Decision

Upon review, the Commission adopts the Initial Decision's findings of fact, the legal conclusions that Respondents Robinson and Thomas did not violate *N.J.S.A. 18A:12-24(c)* and

Respondent Thomas did not violate *N.J.S.A.* 18A:12-24.1(a), and the dismissal of the above-captioned matter.

Therefore, this is a final agency decision and is appealable only to the Superior Court-Appellate Division. *See, N.J.A.C.* 6A:28-9.10(b) and *New Jersey Court Rule* 2:2-3(a). Under *New Jersey Court Rule* 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.

Robert W. Bender, Chairperson

Mailing Date: September 24, 2024

***Resolution Adopting Decision
in Connection with C07-20***

Whereas, at its meeting on September 29, 2020, the School Ethics Commission (Commission) voted to transmit the above-captioned matter to the Office of Administrative Law (OAL) for a hearing; and

Whereas, the Administrative Law Judge (ALJ) issued an Initial Decision dated June 17, 2024; and

Whereas, in the Initial Decision, the ALJ found that Respondents Robinson and Thomas did not violate *N.J.S.A.* 18A:12-24(c) and Respondent Thomas did not violate *N.J.S.A.* 18A:12-24.1(a), and ordered the dismissal of the above-captioned matter; and

Whereas, Petitioner filed exceptions to the Initial Decision and Respondent Thomas and Respondent Robinson filed replies to the exceptions; and

Whereas, at its meeting on August 27, 2024, the Commission reviewed and discussed the record, including the ALJ's Initial Decision; and

Whereas, at its meeting on August 27, 2024, the Commission discussed adopting the Initial Decision's findings of fact, the legal conclusions that Respondents Robinson and Thomas did not violate *N.J.S.A.* 18A:12-24(c) and Respondent Thomas did not violate *N.J.S.A.* 18A:12-24.1(a), and the dismissal of the above-captioned matter; and

Whereas, at its meeting on September 24, 2024, the Commission reviewed and voted to approve the within decision as accurately memorializing its actions/findings from its meeting on August 27, 2024; and

Now Therefore Be It Resolved, the Commission hereby adopts the within decision.

Robert W. Bender, Chairperson

I hereby certify that this Resolution was duly adopted by the School Ethics Commission at its meeting on September 24, 2024.

Brigid C. Martens, Director
School Ethics Commission