IN THE MATTER OF	:	NEW JERSEY DEPARTMENT OF EDUCATION
THE CERTIFICATES OF	:	STATE BOARD OF EXAMINERS
CHRISTOPHER BATES	:	ORDER OF REVOCATION
_____	:	DOCKET NO: 2526-168

At its meeting of January 26, 2026, the State Board of Examiners (Board) reviewed information from the Department of Education (DOE) – Office of Student Protection (OSP) and the DOE – Office of Legal Affairs, Accountability and Compliance (OLAAC) regarding Christopher Bates, including documents obtained from the Morris County Prosecutor's Office (MCPO) and the Denville Police Department (DPD). Bates currently holds an Instructional Substitute credential, issued December 2021, expiring December 31, 2026.

On or about November 21, 2024, Bates was charged with Stalking (3rd degree), *N.J.S.A.* 2C:12-10C; Contempt – Violate Domestic Violence Order (4th degree), *N.J.S.A.* 2C:29-9B(1); and Harassment (disorderly persons offense), *N.J.S.A.* 2C:33-4A. It was alleged that between October 3, 2024, and November 21, 2024, Bates violated a temporary restraining order (TRO) by sending thousands of text messages to the victim, calling the victim's work phone, and emailing the victim's work email after a TRO was issued. It was also alleged that Bates was continuously text messaging the victim while she was at police headquarters reporting the violation. It was further alleged that Bates failed to appear at the Morris County Superior Court regarding the TRO.

On April 1, 2025, Bates pled guilty to Contempt – Violate Domestic Violence Order (4th degree), *N.J.S.A.* 2C:29-9B(1), and Harassment (disorderly persons offense), *N.J.S.A.* 2C:33-4A. The charge of Stalking (3rd degree), *N.J.S.A.* 2C:12-10C, was dismissed.

On May 15, 2025, Bates was sentenced to one (1) year of probation and a period of 68 days in custody with a credit of time served of 68 days. Additionally, Bates was ordered to undergo

random drug/alcohol testing; undergo a Treatment Assessment Services for the Courts (TASC) Evaluation and follow any aftercare recommendations; abide by the TRO with regards to the victim; have no contact with the victim in person, by telephone, by mail, through third person or by electronic means; undergo DNA testing and pay the costs associated; and pay fines and penalties. Bates was also prohibited from purchasing, owning, possessing or controlling a firearm and from receiving or retaining a firearm purchaser identification card or a permit to purchase a handgun.

Upon review of the above information, the Board voted at its meeting of March 6, 2026, to issue Bates an Order to Show Cause as to why the certificates he holds should not be revoked. On March 6, 2026, the Board sent Bates the Order to Show Cause by regular and certified mail, return receipt requested. The Order provided that Bates had thirty (30) days to respond pursuant to *N.J.A.C.* 6A:9B-4.6(b). The certified mail copy was returned to sender and marked "Unclaimed," and the regular mail copy was not returned. Bates did not file a response.

On April 28, 2026, the Board sent a second notice to Bates, providing him with an additional fifteen (15) days to respond. The certified mail copy was marked "Unclaimed," and the regular mail copy was not returned. Again, Bates did not file a response.

Thereafter, pursuant to *N.J.A.C.* 6A:9B-4.6(e), the Board sent Bates a hearing notice by regular and certified mail, return receipt requested, on July 16, 2026. The notice explained that because no answer was filed, there appeared to be no dispute as to material facts in this matter. Thus, Bates was offered an opportunity to submit written arguments on the issue of whether the conduct addressed in the Order to Show Cause constituted conduct unbecoming a certificate holder, as well as arguments with regard to the appropriate sanction in the event that the Board found just cause to take action against his certificates. Bates was also offered the opportunity to

appear before the Board to provide testimony on the sanction issue. The certified mail copy was marked "Unclaimed," and the regular mail copy was not returned. Bates did not file a response or request to appear before the Board.

The Board has the authority to "issue appropriate certificates to teach or to administer," and "may revoke the same under rules and regulations prescribed by the State board." *N.J.S.A.* 18A:6-38; *see also N.J.A.C.* 6A:9B-3.2 and -4.4; *Morison v. Willingboro Bd. of Educ.*, 478 N.J. Super. 229 (App. Div. 2024), *cert. denied* 258 N.J. 143 (July 11, 2024). The Board may take action against a certificate holder on the basis of "demonstrated inefficiency, incapacity, conduct unbecoming a teacher, or other just cause." *N.J.A.C.* 6A:9B-4.4(a); *see also Morison*, 478 N.J. Super. at 246, 248 (explaining the Board is responsible for protecting schoolchildren from improper teacher conduct and may suspend or revoke an educator's continued ability to serve as a teacher at any public school based on unbecoming conduct).

Because Bates failed to respond to the Order to Show Cause, the allegations are deemed admitted. *N.J.A.C.* 6A:9B-4.6(c). Consequently, at its meeting of September 18, 2026, the Board considered only the allegations in the March 6, 2026 Order to Show Cause and the information received from the OSP, OLAAC, MCPO and DPD. Because the allegations were deemed admitted, the Board concluded that no material facts related to Bates' offenses were in dispute. And because no material facts related to Bates' conduct were in dispute, the Board determined that summary decision was appropriate in this matter. *N.J.A.C.* 6A:9B-4.6(h).

The threshold issue before the Board in this matter is whether Bates' actions here constitute conduct unbecoming a certificate holder or other just cause. Based on the undisputed facts in this matter, the Board finds that Bates engaged in conduct unbecoming of an educator. Unbecoming conduct is defined as "conduct 'which adversely affects the morale or efficiency of the

[department]' or 'has a tendency to destroy public respect for [government] employees and confidence in the operation of [public] services.'" *Bound Brook Bd. of Educ. v. Ciripompa*, 228 N.J. 4, 13 (2017) (quoting *In re Young*, 202 N.J. 50, 66 (2010) (citing *Karins v. Atl. City*, 152 N.J. 532, 554 (1998))). "[A] finding of unbecoming conduct 'need not be predicated upon the violation of any particular rule or regulation, but may be based merely upon the violation of the implicit standard of good behavior which devolves upon one who stands in the public eye as an upholder of that which is morally and legal correct.'" *Id.* at 13-14 (quoting *Karins*, 152 N.J. at 555). "It focuses on the morale, efficiency, and public perception of an entity, and how those concerns are harmed by allowing teachers to behave inappropriately while holding public employment." *Id.* at 14. "The touchstone of the determination lies in the certificate holder's 'fitness to discharge the duties and functions of one's office or position.'" *Young*, 202 N.J. at 66 (quoting *In re Grossman*, 127 N.J. Super. 13, 29 (App. Div. 1974)).

Here, the Board finds that Bates violating a domestic violence TRO by sending thousands of text messages to the victim, calling the victim's work phone and emailing the victim's work email after a TRO was issued violates the implicit standard of good behavior expected of public school teachers. Further, being convicted of Contempt – Violate Domestic Violence Order (4th degree), *N.J.S.A.* 2C:29-9B(1), and Harassment (disorderly persons offense), *N.J.S.A.* 2C:33-4A, has the tendency to destroy public respect for teachers and confidence in the public school system. Thus, the Board finds that Bates engaged in conduct unbecoming an educator and provides the basis for the Board's finding.

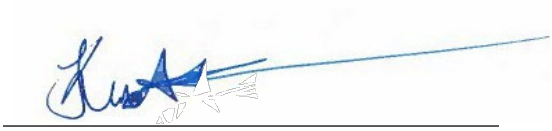
Having found that Bates engaged in unbecoming conduct, the Board must now determine the appropriate penalty to be applied. In doing so, the Board considers the "nature and gravity of the offenses under all the circumstances involved, any evidence as to provocation, extenuation or

aggravation," and any "harm or injurious effect" on the maintenance of discipline and the proper administration of the school system. *In re Fulcomer*, 93 N.J. Super. 404, 422 (App. Div. 1967). Central to this evaluation is the understanding that "[t]eachers … are professional employees to whom the people have entrusted the care and custody of … school children. This heavy duty requires a degree of self-restraint and controlled behavior rarely requisite to other types of employment." *IMO Tenure of Sammons*, 1972 *S.L.D.* 302, 321 (Comm'r. Decision, June 12, 1972). Fitness to teach depends on a broad range of factors, including the teacher's impact and effect upon the students, because a "teacher works in a sensitive area in a schoolroom" and "shapes the attitude of young minds toward the society in which they live." *Grossman*, 127 N.J. at 30 (*quoting Adler v. Bd. of Educ. of City of New York*, 342 U.S. 485 (1952)). Importantly, unfitness to hold a position in a school system may be shown by one incident if sufficiently flagrant. *Fulcomer*, 93 N.J. Super. at 421; *Redcay v. State Bd. of Educ.*, 130 *N.J.L.* 369, 371 (1943), *aff'd*, 131 *N.J.L.* 326 (E & A 1944).

In this instance, the Board concludes that the appropriate response to Bates' breach in conduct of an educator is revocation of his credential. Bates' undisputed conduct of continuing to send a domestic violence victim messages via text, work telephone and work email after a court issued an order telling him to not contact the victim is not conduct of a role model for children. Rather, his conduct demonstrates he is unfit to discharge the duties and functions as a public-school teacher, and demonstrates strong evidence that revocation is appropriate. Allowing him to maintain certification to teach in a public school would have a negative impact on the proper administration of the school system.

Accordingly, on September 18, 2026, the Board voted to revoke Bates' certificates. On this 29th day of October 2026, the Board voted to adopt its formal written decision, and it is

therefore ORDERED that Christopher Bates' Instructional Substitute credential is hereby REVOKED, effective immediately. It is further ORDERED that Bates return his paper certificate, if issued, to the Secretary of the State Board of Examiners, Office of Certification and Induction, P.O. Box 500, Trenton, NJ 08625-0500 within 30 days of the mailing date of this decision.



Kimberly A. Gatti, Acting Secretary
State Board of Examiners

Date of Mailing: 10/29/2026
By Certified and Regular mail

Appeals may be made to the Commissioner of Education pursuant to the provisions of *N.J.S.A.* 18A:6-38.4 and *N.J.A.C.* 6A:4-1.3.