

ROGER CHU, CHRISTINE SHERIDAN	:	
CELIA, CHRISTOPHER DILKUS, REGAN	:	BEFORE THE SCHOOL
KAIDEN, MARY SAVERINO, KATE	:	ETHICS COMMISSION
SELTZER, SARAH SHERMAN	:	OF NEW JERSEY
COMPLAINANTS	:	
v.	:	NO.:
MEGHAN MIKULSKI	:	
RESPONDENT	:	
_____	:	

AND NOW come Complainants Roger Chu, Christine Sheridan Celia, Christopher Dilkus, Regan Kaiden, Mary Saverino, Kate Seltzer, and Sarah Sherman, and request that the School Ethics Commission consider a Complaint against Respondent Meghan Mikulski, in accordance with the authority of the School Ethics Commission to entertain such complaints under *N.J.S.A. 18A:12-21 et seq.* In support thereof Complainants state the following:

I. STATEMENT OF FACTS COMMON TO EACH ALLEGED COUNT OF VIOLATIONS OF *N.J.S.A. 18A:12-24.1 et seq.*

Privacy exception

1. Complainant Regan Kaiden resides at [REDACTED], Collingswood, NJ 08108; phone: [REDACTED]; e-mail: [REDACTED]. Ms. Kaiden is the President of the Collingswood Board of Education.

Privacy exception

2. Complainant Kate Seltzer resides at [REDACTED], Collingswood, NJ 08108; phone: [REDACTED]; e-mail: [REDACTED]. Ms. Seltzer is the Vice President of the Collingswood Board of Education.

Privacy exception

3. Complainant Roger Chu resides at [REDACTED], Collingswood, NJ 08108; phone: [REDACTED]; e-mail: [REDACTED]. Mr. Chu is a member of the Collingswood Board of Education and chair of the Board's Curriculum Committee.

Privacy exception

4. Complainant Christine Sheridan Celia resides at [REDACTED], Collingswood, NJ 08108; phone: [REDACTED]; e-mail: [REDACTED]. Ms. Celia is a member of the Collingswood Board of Education.

Privacy exception

5. Complainant Mary Saverino resides at [REDACTED], Collingswood, NJ 08108; phone: [REDACTED]; e-mail: [REDACTED]. Ms. Saverino is a member of the Collingswood Board of Education.

Privacy exception

6. Complainant Sarah Sherman resides at [REDACTED], Collingswood, NJ 08107; phone: [REDACTED]; e-mail: [REDACTED]. Ms. Sherman is a member of the Collingswood Board of Education.

Privacy exception

7. Complainant Christopher Dilkus resides at [REDACTED], Woodlynne, NJ 08107; phone: [REDACTED]; e-mail: [REDACTED]. Mr. Dilkus is a member of the Woodlynne Board of Education and serves as the Woodlynne Board of Education's representative on the Collingswood Board of Education.

Privacy exception

8. Respondent Meghan Mikulski resides at [REDACTED], Collingswood, NJ 08108; phone: [REDACTED]; e-mail: mmikulski@collsk12.org. Ms. Mikulski is a member of the Collingswood Board of Education.

9. In January 2022, Ms. Mikulski was sworn in for a three-year term on the Collingswood Board of Education and has received board member code of ethics trainings, both through the course of mandated NJSBA trainings for board members and during regular Collingswood Board of Education meetings (Sep. 18, 2023, training by the Board solicitor: <https://www.youtube.com/live/g32u5mg-UVw?si=LHA19DPcWeka4Mwy&t=284>).

10. In 2024, Respondent was named to the Collingswood Board of Education's Curriculum Committee and its Finance, Buildings, and Grounds Committee.

11. Committee meetings are typically held the week prior to the regularly scheduled monthly Board meetings.

12. Ahead of the September 2024 Board meeting, both the Curriculum Committee and Finance, Buildings, and Grounds Committee meetings were held on Monday, September 16, 2024.

13. Complainants Chu, Kaiden, and Saverino and Respondent Mikulski attended the September 16, 2024 Curriculum Committee meeting. This meeting was led by Dr. Frederick McDowell, Superintendent of the Collingswood and Oaklyn Public Schools.

14. Complainants Celia, Dilkus, and Kaiden and Respondent Mikulski attended the September 16, 2024, Finance, Buildings, and Grounds Committee meeting, along with Collingswood Board of Education member Matthew Craig. This meeting was led by Dr. McDowell, Assistant Superintendent Beth Ann Coleman, and Supervisor of Buildings and Grounds John Longo.

15. On the evening of Thursday, September 19, 2024, three days after those committee meetings, Ms. Mikulski reached out to Ms. Kaiden, asking to speak at 9 p.m. that night. Ms. Kaiden was unavailable, and the two scheduled a call for the next morning.

16. On the morning of Friday, September 20, 2024, Ms. Mikulski and Ms. Kaiden spoke by phone. During this conversation Ms. Mikulski first notified Ms. Kaiden of concerns she had about the September 16, 2024, committee meetings.

17. At 2:34 p.m. on Friday, September 20, 2024, Ms. Mikulski e-mailed Ms. Kaiden and Dr. McDowell to request a meeting ahead of the Monday, September 23, 2024, public Board meeting. *See* referenced e-mails, attached hereto as Exhibit "A".

18. Dr. McDowell responded to Ms. Mikulski at 2:53 p.m. on Friday, September 20, 2024:

"Monday is a pretty busy day. Please provide additional context into your request. Are you requesting as a BOE member or a CHS [Collingswood High School] parent?"

See Exhibit "A".

19. At 1:14 p.m. on Sunday, September 22, 2024, Ms. Mikulski responded to Dr. McDowell's Friday, September 20, 2024, email:

"Good Afternoon - I suppose the conversation I would like to have transcends both of these realms. But if time cannot be made on Monday, ok. Thank you for your response."

See Exhibit "A".

20. The September monthly public Board meeting of the Collingswood Board of Education was held on Monday, September 23, 2024, beginning at 6:30 p.m.

21. Complainants Chu, Dilkus, Kaiden, Seltzer, Celia, and Sherman and Respondent Mikulski were among the Board members in attendance at the public Board meeting. Ms. Kaiden departed the Board meeting prior to Ms. Mikulski's statements, referenced below.

22. Superintendent Dr. McDowell also was present at the meeting. This public meeting was broadcast live on YouTube, and the recording is available online at https://www.youtube.com/live/RhiEpkqargo?si=HwgB1WH2XEwnse_F&t=5828.

23. Following the Board vote on the Curriculum Committee items presented by Mr. Chu, chairman of the Curriculum Committee, Ms. Mikulski made a statement as a Board member in which she publicly admonished the performance of the superintendent in connection with the concerns she first voiced to Ms. Kaiden on Friday, September 20, 2024.

24. During her statement, Ms. Mikulski publicly discussed information about a confidential investigation and described her impression of the superintendent's actions during the closed-door committee meetings of Monday, September 16, 2024.

25. Despite multiple warnings from Mr. Chu that her statements were in violation of prohibitions of speaking publicly about personnel matters, Ms. Mikulski continued her comments, insisting that her position as Board member provided her with the right to speak despite being "on notice that [her] activity would violate the [School Ethics] Act."

26. Video of Ms. Mikulski's public comments at the Board table during the September 23, 2024, public Board meeting and the interjections by Complainant Chu can be seen here: https://www.youtube.com/live/RhiEpkqargo?si=HwgB1WH2XEwnse_F&t=5828 (timestamp 1:37:08).

27. A transcript, as transcribed by Mr. Chu with vocal disfluencies removed, follows:

Mikulski (Respondent): Thank you very much. I did want to have this conversation outside of a public meeting, but time could not be made to accommodate me, so I would like to make my comments now. I would like to discuss something that occurred in Curriculum Committee last week. Dr. McDowell, you informed some Board members including myself of a situation at the high school, and I would like to say obviously I will not be commenting publicly on specific confidential details about any kind of an investigation. However, I am extremely concerned about how these issues were represented to the Board members that night.

The language that you used suggested a definite hostility toward the concerns of some students and community members. At that time, the investigation was still in

process, so the outcome was not yet known. I feel that some of this language towards the concern of parents and students to whom you are responsible was at best premature and at worst inappropriate. I strongly feel that when a superintendent hears about concerns of students and parents, you should not then describe them to Board members in a closed session as a conspiracy or as racially motivated unless there is specific evidence as a result of an investigation to support those claims.

At the next committee meeting that same night, at which I was also present, your tone and language were definitely more measured, and I appreciated that. But when asked about details of said incident, which I understand, you relayed information about a particular student and his actions relating to this conflict. The problem is that you communicated pretty negative details about a student's actions that had not yet been fully investigated, and therefore, we had no knowledge of the validity of this account. In fact, your account of this particular student's actions was not accurate. And I know this because the student you spoke of is my son. This entire issue has been very upsetting to me as a parent, but I think that this also brings up a larger Board-related concern. I feel that the misrepresentation of information to Board members who will ultimately be making decisions about and voting on programming within this district—

Chu (Complainant): Ms. Mikulski. I'm going to step in and note that I think this is bordering on personnel-related issues, and as such, that's not something that we should be speaking about in public.

Mikulski: Well actually...

Chu: This is about... you're now speaking about the specific performance of the superintendent, which is a personnel-related item.

Mikulski: No, no. I am a Board member, and I have the right to speak. I have checked in these comments with my contacts at the School Board Association. I was

told that this was completely warranted. And I want to have a discussion, and I think that that's fair.

[Applause and cheering from the audience.]

Mikulski: Again, I would like to finish my comments, and I think – I asked for this meeting to be held behind closed doors, and time could not be made, so I'm having this conversation now.

Chu: I'm advising you right now that that is going to put this Board at risk in terms of – we would not sit up here and speak about the performance of individual teachers either.

Mikulski: Well, again, as this is a conversation that as a Board member, I have the right to have, and I have the right to have questions about this situation. Again, I asked for it. Could not be made available. So, you know, these are my comments.

You know, at the end of the day, I will wrap up. I am concerned about the misrepresentation of information. And, you know, again, considering that this was my child, I know that things were misrepresented. I really – I wanted to have a meeting to talk about this and to have an opportunity to make things right before the meeting. But – and I began with our Board president to make that request, but that could not happen. So, you know, this was a parent action that was made a Board action due to comments. And it really should have been first discussed beforehand with the affected Board member who was present, who had no idea that this situation had reached this level of district leadership involvement.

So, my plan tonight was to set the record straight about comments that were made because quite frankly, the superintendent's voice is the only voice that the Board members hear in committee. And I felt that my mind was kind of spinning at that

time, but got myself together and thought that I would make that clarification. So, thank you.

[End of transcription.]

28. On Friday, September 27, 2024, an article about the September 23, 2024, Collingswood Board of Education meeting appeared in *The Retrospect*, a weekly newspaper covering communities in Camden County, New Jersey, including the Borough of Collingswood.

29. Relevant portions of the article are reproduced below:

Report of Middle School Threat Prompts Police Investigation

by Lily Gannon

The Collingswood Board of Education packed a number of important subjects into their two-hour meeting on Monday, starting with an incident at the middle school that required the involvement of Collingswood police. The district sent out an email on September 22 citing an incident that had been reported on September 19.

According to the email, "the incident involved a potential threat to Collingswood Middle School. The threat involved

verbal comments made by a student that were overheard by multiple students, and subsequently reported by those students to the CMS Main Office." The Collingswood police were notified of the incident and it is currently under investigation.

During his report, superintendent Fredrick McDowell stated, "There has been no immediate or credible threat to any of our schools." He continued that because the incident was still actively

(Continued on page 5)

(Continued from page 1)

being investigated, no more information could be given.

However, later in the meeting, board member Meghan Mikulski brought up concerns involving the investigation when it was first brought up during their curriculum committee meeting. Speaking to McDowell, Mikulski said "The language that you use suggested a definite hostility toward the concerns of some students and community members. At that time, the investigation was still in process so the outcome was not yet known. I feel that some of this language toward the concern of parents and students to whom you are responsible was at best premature and at worst, inappropriate. I strongly feel that when a superintendent hears about concerns of students and parents, you should not then describe them to board members in a closed session as a conspiracy or as racially motivated unless there is specific evidence as a result of an investigation to support those claims."

Mikulski continued that "the problem is that you communicated pretty negative details about a student's actions that had not yet been fully investigated... In fact, your account of this particular student's actions was not accurate and I know this because the student you spoke of is my son."

Mikulski was then inter-

rupted by board member Roger Chu, who stated that this is a personnel-related issue and should not be spoken about publicly as it could potentially put the board at risk. To this, Mikulski stated that she had attempted to speak about the matter privately but that time was not made for her. She added that she had spoken with the New Jersey School Board Association, who told her that it was within her rights to address the situation during the meeting and that she wanted to set the record straight as "the superintendent's voice is the only voice that the board members hear in committee." McDowell did not respond to Mikulski on the matter.

Gannon, Lily, *Report of Middle School Threat Prompts Police Investigation*, *The Retrospect* (September 27, 2024).

30. On September 27, 2024, *The Retrospect* posted a clarification on Facebook of that article which is reproduced below:



The Retrospect

2 days ago · 🌐

...

Colls BOE Story Clarification:

In the September 27, 2024, Collingswood Board of Education story, 'Report of Middle School Threat Prompts Police Investigation,' The Retrospect would like to clarify that the incident which board member Meghan Mikulski referenced about her son is a separate incident and unrelated to the middle school threat reported in the same story. The Retrospect regrets any inadvertent confusion.

II. RESPONDENT'S VIOLATIONS OF THE CODE OF ETHICS FOR SCHOOL BOARD MEMBERS

COUNT I: Violation of N.J.S.A. 18A:12-24.1(e)

31. The allegations of paragraphs one through 30 are incorporated herein by reference as if set forth fully herein.

32. On September 23, 2024, both in her role as an individual Board member and, in the alternative, in her private role as a parent while using her platform as an individual Board member, Ms. Mikulski failed to “recognize that authority rests with the Board of education” and took action that may compromise the Board [N.J.S.C. 18A:12-2(a)] when she openly admonished the superintendent when she had no authority to do so, taking “action beyond the scope of her duties such that, by its nature, had the potential to compromise the district Board of education” [N.J.A.C. 6A:28-6.4(a)5].

33. Specific evaluative comments Ms. Mikulski made during her statement that admonished the superintendent and compromised the Board are as follows:

- “However, I am extremely concerned about how these issues were represented to the Board members that night. The language that you used suggested a definite hostility toward the concerns of some students and community members.”
- “I feel that some of this language towards the concern of parents and students to whom you are responsible was at best premature and at worst inappropriate. I strongly feel that when a superintendent hears about concerns of students and parents, you should not then describe them to Board members in a closed session as a conspiracy or as racially motivated unless there is specific evidence as a result of an investigation to support those claims.”
- “In fact, your account of this particular student’s actions was not accurate.”
- “... but I think that this also brings up a larger Board-related concern. I feel that the misrepresentation of information to Board members who will ultimately be making decisions about and voting on programming within this district—”

34. Ms. Mikulski repeatedly asserted that she had the right to make such evaluative statements publicly because of her position as a Board member, contrary to the fact that all “authority rests with the board of education” and not its individual members.

35. Ms. Mikulski took action beyond the scope of her duties by evaluating the superintendent’s performance in a public Board meeting, in direct violation of Collingswood Board of Education Regulation 1240 (M) Evaluation of Superintendent (*See* Exhibit “B”), which requires that the evaluative conference with the superintendent be held in executive session unless the superintendent requests a public hearing, which the superintendent did not.

36. The Regulation further states that “[e]ach newly appointed or elected Board of Education member shall complete a New Jersey School Boards Association training program on the evaluation of the Superintendent within six months of the commencement of his or her term in office pursuant to *N.J.S.A.* 18A:16-20.3.b. Upon information and belief of the Complainants, Ms. Mikulski is up to date on all required NJSBA trainings.

37. Even after being warned by Mr. Chu that she should not be making such evaluative statements in public and that her actions were putting the Board at risk, Ms. Mikulski continued to make evaluative statements publicly, such as the following statements:

- “I am concerned about the [superintendent’s] misrepresentation of information.”
- “And it really should have been first discussed beforehand [by the superintendent] with the affected Board member who was present...”

38. During her public statements, Ms. Mikulski revealed and spoke about the existence of a confidential investigation and disagreed with the superintendent’s description of events related to the investigation:

“At that time, the investigation was still in process, so the outcome was not yet known. I feel that some of this language towards the concern of parents and students to whom you are responsible was at best premature and at worst inappropriate. I strongly feel that when a superintendent hears about concerns of students and parents, you should not then describe them to Board members in a closed session as a conspiracy or as racially motivated unless there is specific evidence as a result of an investigation to support those claims.”

39. Ms. Mikulski’s actions in publicly evaluating the performance of the superintendent in contradiction to Board policy and in revealing and discussing a confidential investigation in her capacity both as a Board member and/or as a private citizen, with no authority to do so, have the potential to compromise the district Board of Education by exposing the Board of Education to the potential of legal action from the superintendent and from all parties affected by the confidential investigation referenced in her comments.

40. As demonstrated in the media coverage noted above in *The Retrospect*, Ms. Mikulski’s statements at the September 23, 2024, Board meeting about a separate confidential investigation led to the misidentification of her child as a person who made threats at the Collingswood Middle School and as a person who is subject to a police investigation, which,

upon information and belief, is a separate and unrelated matter, also legally compromising the Collingswood Board of Education..

WHEREFORE, Complainants respectfully request that the School Ethics Commission find and determine that the above-named Respondent has violated the School Ethics Act and that Respondent be subject to such penalty or penalties as provided by the Act.

COUNT II. Violation of *N.J.S.A. 18A:12-24.1(g)*

41. The allegations of paragraphs one through 40 are incorporated herein by reference as if set forth fully herein.

42. In the public statements referenced above on September 23, 2024, Ms. Mikulski did not “hold confidential all matters pertaining to the schools which, if disclosed, would needlessly injure individuals or the schools” [*N.J.S.A. 18A:12-24.1(g)*]. Instead, she “took action to make public, reveal, or disclose information that was not public under any laws, regulations, or court orders of this State, or information that was otherwise confidential in accordance with policies, procedures, or practices” [*N.J.A.C. 6A:28-6.4(a)7*].

43. Specifically, Ms. Mikulski publicly discussed her evaluation of the superintendent’s performance in direct violation of Collingswood Board of Education Regulation 1240 (M) Evaluation of Superintendent (*See* Exhibit “B”), which requires that the evaluative conference with the superintendent be held in executive session unless the superintendent requests a public hearing, which the superintendent did not.

44. Ms. Mikulski also publicly revealed information about a confidential investigation that she received in her capacity as a Board member during closed-door committee meetings.

45. Although the identity of the involved student was not disclosed during the committee meetings of September 16, 2024, in her statements during the public school Board meeting on September 23, 2024 Ms. Mikulski revealed that the referenced investigation involved her son, and that she had knowledge of the investigation because she is a parent of the involved student.

46. Ms. Mikulski specifically stated that her public statements were based upon information that she received as a result of her position as a Board member, not only as a parent:

“I would like to discuss something that occurred in Curriculum Committee last week. Dr. McDowell, you informed some Board members including myself of a

situation at the high school... However, I am extremely concerned about how these issues were represented to the Board members that night.”

47. In discussing the investigation publicly at a Board meeting and publicly airing her characterization of the superintendent’s discussion of this investigation held in closed committee meetings, Ms. Mikulski disclosed information that has the potential to needlessly injure individuals or the schools, including her own child, by potentially interfering with the proper conduct of the investigation and by disregarding the confidentiality rights of the parties involved in the investigation.

48. In her statement, Ms. Mikulski made repeated claims that she had the right to discuss such confidential matters in public as a Board member, as evidenced by the following quotations:

- “I am a Board member, and I have the right to speak.”
- “Again, as this is a conversation that as a Board member, I have the right to have, and I have the right to have questions about this situation.”

49. Ms. Mikulski continued:

“And, you know, again, considering that this was my child, I know that things were misrepresented. I really – I wanted to have a meeting to talk about this and to have an opportunity to make things right before the meeting. But – and I began with our Board president to make that request, but that could not happen. *So, you know, this was a parent action that was made a Board action due to comments.* And it really should have been first discussed beforehand with the affected Board member who was present, who had no idea that this situation had reached this level of district leadership involvement.”

(Emphasis added).

50. Instead of following proper protocols available to her as a parent, for example, the process detailed in Collingswood Board of Education Regulation 9130 Public Complaints and Grievances (*See Exhibit “C”*), Ms. Mikulski violated Board policy to ensure student confidentiality to prevent the needless injury to individuals or the school when she revealed confidential matters that she received as a Board member when she aired her grievances publicly as a Board member at the September 23, 2024, public Board meeting.

51. As demonstrated in the media coverage noted above in *The Retrospect*, Ms. Mikulski's statements at the September 23, 2024, Board meeting about a separate confidential investigation led to the misidentification of her child as a person who made threats at the Collingswood Middle School, which, upon information and belief, is a separate and unrelated matter, exposing the District to possible legal action by the involved parties.

WHEREFORE, Complainants respectfully request that the School Ethics Commission find and determine that the above-named Respondent has violated the School Ethics Act and that Respondent be subject to such penalty or penalties as provided by the Act.

COUNT III. Violation of N.J.S.A. 18A:12-24.1(i)

52. The allegations of paragraphs one through 51 are incorporated herein by reference as if set forth fully herein.

53. Failing to "support and protect school personnel in proper performance of their duties" [N.J.S.A. 18A:12-24.1(i)], Ms. Mikulski instead on September 23, 2024, "took deliberate action that resulted in the undermining, opposing, compromising, or harming school personnel in the proper performance of their duties" [N.J.A.C. 6A:28-6.4(a)9].

54. During her statement, she publicly admonished the performance of the superintendent without any Board authority to do so.

55. Ms. Mikulski's comments and her account of the superintendent's actions during Board committee meetings create a narrative that the superintendent acts in an untrustworthy and unprofessional manner during the discharge of his duties in leading Board committee meetings.

56. These public statements compromise the superintendent's ability to lead the district and discharge his duties by eroding trust in his professionalism and judgment.

57. Ms. Mikulski, as seen in the recording of the September 23, 2024, public meeting, read her public statements from a physical document, which is evidence of the deliberate and meditated nature of her actions.

58. Even after repeated interruptions by Mr. Chu attempting to stop her public statement, Ms. Mikulski continued with her actions that undermined, opposed, compromised, and harmed the superintendent and compromised not one but two confidential investigations, the one that she described as involving her son and a separate investigation at the Collingswood Middle School involving the Collingswood Police Department.

WHEREFORE, Complainants respectfully request that the School Ethics Commission find and determine that the above-named Respondent has violated the School Ethics Act and that Respondent be subject to such penalty or penalties as provided by the Act.

COUNT IV. Violation of *N.J.S.A. 18A:12-24.1(j)*

59. The allegations of paragraphs one through 58 are incorporated herein by reference as if set forth fully herein.

60. During the public Board meeting on September 23, 2024, Ms. Mikulski acted on her complaint prior to the completion or failure of an administrative solution [*N.J.S.A. 18A:12-24.1(j)*].

61. Ms. Mikulski stated that her comments were about a “parent action that was made a Board action due to comments.”

62. Ms. Mikulski also asserted that she was making the statement because she was unable to meet with the superintendent to address this issue prior to the public meeting.

63. The inability to meet with Dr. McDowell within one business day of her request is not a “failure of an administrative solution,” as no meeting had yet taken place to express her concerns to the superintendent.

64. Ms. Mikulski, if she were acting as a parent, had not completed the procedure detailed in Collingswood Board of Education Regulation 9130 Public Complaints and Grievances (*See Exhibit “C”*) to seek an administrative solution to her grievances.

65. Per the regulation, Parent Mikulski would have had to have submitted a written request for a hearing before the Board as part of the final steps in seeking an administrative solution to her grievances.

66. Upon information and belief, no such request was received by the Board.

67. In making her statements during the public meeting, Ms. Mikulski attempted to resolve her complaints without following the proper administrative process available to her in violation of *N.J.S.A. 18A:12-24.1(j)*.

WHEREFORE, Complainants respectfully request that the School Ethics Commission find and determine that the above-named Respondent has violated the School Ethics Act and that Respondent be subject to such penalty or penalties as provided by the Act.

COUNT V. Violation of N.J.S.A. 18A:12-24.1(f)

68. The allegations of paragraphs one through 67 are incorporated herein by reference as if set forth fully herein.

69. On September 23, 2024, Ms. Mikulski spoke in a public board meeting and criticized Dr. McDowell about his purported description of a confidential school investigation.

70. Ms. Mikulski stated in part:

The language that you used suggested a definite hostility toward the concerns of some students and community members. At that time, the investigation was still in process, so the outcome was not yet known. I feel that some of this language towards the concern of parents and students to whom you are responsible was at best premature and at worst inappropriate. I strongly feel that when a superintendent hears about concerns of students and parents, you should not then describe them to Board members in a closed session as a conspiracy or as racially motivated unless there is specific evidence as a result of an investigation to support those claims.

But when asked about details of said incident, which I understand, you relayed information about a particular student and his actions relating to this conflict. The problem is that you communicated pretty negative details about a student's actions that had not yet been fully investigated, and therefore, we had no knowledge of the validity of this account. *In fact, your account of this particular student's actions was not accurate. And I know this because the student you spoke of is my son.* This entire issue has been very upsetting to me as a parent, but I think that this also brings up a larger Board-related concern. I feel that the misrepresentation of information to Board members who will ultimately be making decisions about and voting on programming within this district— . . .

(emphasis added).

71. By using information about a confidential investigation that she gained because of her position as a Board member and by using her official position as a Board member during a public Board meeting to make a public statement from the Board table in defense of her own son, Ms. Mikulski “used the schools to acquire some benefit for [her] immediate family” in violation of N.J.S.A. 18A:12-24.1(f) by defending her son and stating “[i]n fact, your account of this

particular student's actions was not accurate. And I know this because the student you spoke of is my son."

72. Ms. Mikulski's actions compromised the confidential investigation involving her son by using her official Board position to advance a beneficial characterization of her immediate family member's actions while calling into question the credibility of the Superintendent.

WHEREFORE, Complainants respectfully request that the School Ethics Commission find and determine that the above-named Respondent has violated the School Ethics Act and that Respondent be subject to such penalty or penalties as provided by the Act.

C79-24 Amended Complaint Signed.pdf

Date: 10/12/24


Signature of Complainant, Roger Chu

CERTIFICATION

Roger Chu, of full age, hereby certifies that the following statements are true:

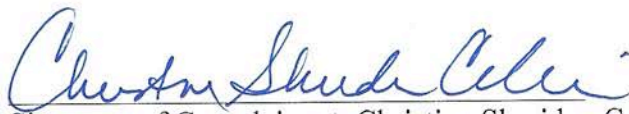
1. I am a Complainant in this matter.
2. I have read the Amended Complaint and aver that the facts contained therein are true to the best of my knowledge and belief and I am aware that the statute that created the School Ethics Commission authorizes the School Ethics Commission to impose penalties for filing a frivolous complaint. *N.J.S.A. 18A:12-29(e)*. I am aware that if the respondent replies to the Complaint with an allegation that the Amended Complaint is frivolous, I shall have 20 days from receipt of the written statement to only respond to the allegation that the Complaint is frivolous.
3. The subject matter of this Amended Complaint is not pending in any court of law or administrative agency of this State. I will advise the School Ethics Commission if I subsequently become aware that it is pending elsewhere.

Date: 10/12/24


Signature of the Complainant

C79-24 Amended Complaint Signed.pdf

Date: 10/12/2024


Signature of Complainant, Christine Sheridan Celia

CERTIFICATION

Christine Sheridan Celia, of full age, hereby certifies that the following statements are true:

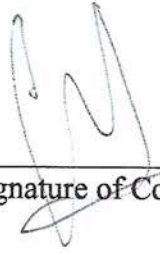
1. I am a Complainant in this matter.
2. I have read the Amended Complaint and aver that the facts contained therein are true to the best of my knowledge and belief and I am aware that the statute that created the School Ethics Commission authorizes the School Ethics Commission to impose penalties for filing a frivolous complaint. *N.J.S.A. 18A:12-29(e)*. I am aware that if the respondent replies to the Complaint with an allegation that the Amended Complaint is frivolous, I shall have 20 days from receipt of the written statement to only respond to the allegation that the Complaint is frivolous.
3. The subject matter of this Amended Complaint is not pending in any court of law or administrative agency of this State. I will advise the School Ethics Commission if I subsequently become aware that it is pending elsewhere.

Date: 10/12/2024


Signature of the Complainant

C79-24 Amended Complaint Signed.pdf

Date: 12 OCT 2024



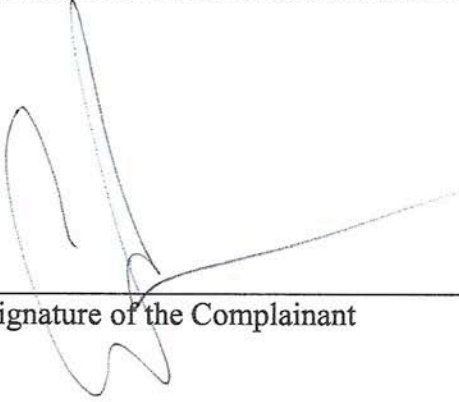
Signature of Complainant, Christopher Dilkus

CERTIFICATION

Christopher Dilkus, of full age, hereby certifies that the following statements are true:

1. I am a Complainant in this matter.
2. I have read the Amended Complaint and aver that the facts contained therein are true to the best of my knowledge and belief and I am aware that the statute that created the School Ethics Commission authorizes the School Ethics Commission to impose penalties for filing a frivolous complaint. *N.J.S.A. 18A:12-29(e)*. I am aware that if the respondent replies to the Complaint with an allegation that the Amended Complaint is frivolous, I shall have 20 days from receipt of the written statement to only respond to the allegation that the Complaint is frivolous.
3. The subject matter of this Amended Complaint is not pending in any court of law or administrative agency of this State. I will advise the School Ethics Commission if I subsequently become aware that it is pending elsewhere.

Date: 12 OCT 2024



Signature of the Complainant

C79-24 Amended Complaint Signed.pdf

Date: 10-11-2024


Signature of Complainant, Regan Kaiden

CERTIFICATION

Regan Kaiden, of full age, hereby certifies that the following statements are true:

1. I am a Complainant in this matter.
2. I have read the Amended Complaint and aver that the facts contained therein are true to the best of my knowledge and belief and I am aware that the statute that created the School Ethics Commission authorizes the School Ethics Commission to impose penalties for filing a frivolous complaint. *N.J.S.A. 18A:12-29(e)*. I am aware that if the respondent replies to the Complaint with an allegation that the Amended Complaint is frivolous, I shall have 20 days from receipt of the written statement to only respond to the allegation that the Complaint is frivolous.
3. The subject matter of this Amended Complaint is not pending in any court of law or administrative agency of this State. I will advise the School Ethics Commission if I subsequently become aware that it is pending elsewhere.

Date: 10-11-2024


Signature of the Complainant

Date: October 12, 2024Mary Saverino
Signature of Complainant, Mary Saverino**CERTIFICATION**

Mary Saverino, of full age, hereby certifies that the following statements are true:

1. I am a Complainant in this matter.
2. I have read the Amended Complaint and aver that the facts contained therein are true to the best of my knowledge and belief and I am aware that the statute that created the School Ethics Commission authorizes the School Ethics Commission to impose penalties for filing a frivolous complaint. *N.J.S.A. 18A:12-29(e)*. I am aware that if the respondent replies to the Complaint with an allegation that the Amended Complaint is frivolous, I shall have 20 days from receipt of the written statement to only respond to the allegation that the Complaint is frivolous.
3. The subject matter of this Amended Complaint is not pending in any court of law or administrative agency of this State. I will advise the School Ethics Commission if I subsequently become aware that it is pending elsewhere.

Date: October 12, 2024Mary Saverino
Signature of the Complainant

Date:

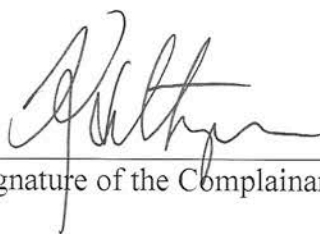
10/12/24

Signature of Complainant, Kate Seltzer**CERTIFICATION**

Kate Seltzer, of full age, hereby certifies that the following statements are true:

1. I am a Complainant in this matter.
2. I have read the Amended Complaint and aver that the facts contained therein are true to the best of my knowledge and belief and I am aware that the statute that created the School Ethics Commission authorizes the School Ethics Commission to impose penalties for filing a frivolous complaint. *N.J.S.A. 18A:12-29(e)*. I am aware that if the respondent replies to the Complaint with an allegation that the Amended Complaint is frivolous, I shall have 20 days from receipt of the written statement to only respond to the allegation that the Complaint is frivolous.
3. The subject matter of this Amended Complaint is not pending in any court of law or administrative agency of this State. I will advise the School Ethics Commission if I subsequently become aware that it is pending elsewhere.

Date:

10/12/24

Signature of the Complainant

Date:

10/13/24


Signature of Complainant, Sarah Sherman**CERTIFICATION**

Sarah Sherman, of full age, hereby certifies that the following statements are true:

1. I am a Complainant in this matter.
2. I have read the Amended Complaint and aver that the facts contained therein are true to the best of my knowledge and belief and I am aware that the statute that created the School Ethics Commission authorizes the School Ethics Commission to impose penalties for filing a frivolous complaint. *N.J.S.A. 18A:12-29(e)*. I am aware that if the respondent replies to the Complaint with an allegation that the Amended Complaint is frivolous, I shall have 20 days from receipt of the written statement to only respond to the allegation that the Complaint is frivolous.
3. The subject matter of this Amended Complaint is not pending in any court of law or administrative agency of this State. I will advise the School Ethics Commission if I subsequently become aware that it is pending elsewhere.

Date:

10/13/24

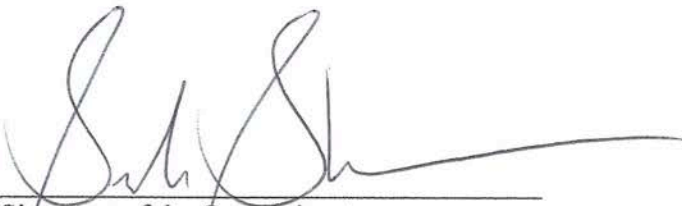

Signature of the Complainant

EXHIBIT A



Regan Kaiden <rkaiden@collsk12.org>

Committee Discussion

Meghan Mikulski <mmikulski@collsk12.org>

Sun, Sep 22, 2024 at 1:14 PM

To: "Fredrick McDowell, Ed.D." <fmcowell@collsk12.org>

Cc: Regan Kaiden <rkaiden@collsk12.org>

Good Afternoon - I suppose the conversation I would like to have transcends both of these realms. But if time cannot be made on Monday, ok. Thank you for your response.

Meghan

On Fri, Sep 20, 2024 at 2:53 PM Fredrick McDowell, Ed.D. <fmcowell@collsk12.org> wrote:

Good afternoon,

Monday is a pretty busy day. Please provide additional context into your request. Are you requesting as a BOE member or a CHS parent?

Thanks,

**Fred McDowell, Ed.D.**

Superintendent, Collingswood and Oaklyn Public Schools

(856) 962-5702 | www.collsk12.org | fmcowell@collsk12.org

100 Lees Ave, Collingswood, NJ 08108

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From: Meghan Mikulski <mmikulski@collsk12.org>**Date:** Friday, September 20, 2024 at 2:32 PM**To:** Fredrick McDowell, Ed.D. <fmcowell@collsk12.org>, Regan Kaiden <rkaiden@collsk12.org>**Subject:** Committee Discussion

9/25/24, 6:16 PM

Collingswood Public School Mail - Committee Discussion

Hi Fred and Regan - I would like to request a meeting for the three of us to discuss [REDACTED] that was brought up at Monday's committee meetings. I would like to have this meeting before our Board meeting on Monday. I know Monday is busy so I will take a half day from work if necessary.

Personnel records exception;
privacy exemption

Thank you -

Meghan

EXHIBIT A

EXHIBIT B

REGULATION

COLLINGSWOOD SCHOOL DISTRICT

ADMINISTRATION
R M1240/Page 1 of 3
EVALUATION OF SUPERINTENDENT

R 1240 (M) EVALUATION OF SUPERINTENDENT

A. Roles and Responsibilities for the Implementation of the Annual Evaluation Policy and Procedures

1. The Board of Education and the Superintendent will develop and the Board will adopt a job description and evaluation criteria for the Superintendent's position based upon the Board's local goals, program objectives, policies, instructional priorities, State goals, statutory requirements, and the functions, duties, and responsibilities of the Superintendent.
2. The Superintendent shall have primary responsibility for data collection and reporting methods appropriate to the job description.
3. The Board President, or the Board President's designee, shall oversee the annual evaluation of the Superintendent.
4. The Board President shall establish timelines for completion of the annual evaluation of the Superintendent.

B. Annual Summary Conference

1. The Board of Education shall conduct an annual summary conference with the Superintendent to develop and prepare an annual performance report.
2. The annual summary conference between the Board of Education, with a majority of its total membership present, and the Superintendent shall be held before the annual performance report is prepared and filed.
3. The Superintendent shall submit to all Board members any information, documents, statistics, or any other data or information he/she would like for the Board members to consider at the annual summary conference.
4. The Board President, or the Board President's designee, shall preside over the Board's annual summary conference meeting.
5. The conference shall be held in executive session, unless the Superintendent requests it be held in public. The conference shall include, but not be limited to, review of the following:



REGULATION

COLLINGSWOOD SCHOOL DISTRICT

ADMINISTRATION
R M1240/Page 2 of 3
EVALUATION OF SUPERINTENDENT

- a. Performance of the Superintendent based upon the Board approved job description;
- b. Progress of the Superintendent in achieving and/or implementing the school district's goals, program objectives, policies, instructional priorities, State goals, and statutory requirements; and
- c. Indicators of student progress and growth toward program objectives.

C. Annual Performance Report

1. The annual performance report shall be prepared and approved by a majority of the Board of Education's total membership by July 1 and shall include, but not be limited to:
 - a. Performance area(s) of strength;
 - b. Performance area(s) needing improvement based upon the job description and evaluation criteria set forth in N.J.A.C. 6A:10-8.1(c)2;
 - c. Recommendations for professional growth and development;
 - d. Summary of indicators of student progress and growth, and a statement of how the indicators relate to the effectiveness of the overall program and the Superintendent's performance; and
 - e. Provision for performance data not included in the report to be entered into the record by the Superintendent within ten teaching staff member working days after the report's completion.
2. The Board President, or the Board President's designee, shall prepare a draft of the annual performance report after the annual summary conference.
3. The draft of the annual performance report shall be disseminated to all Board members for review and comment before presenting the draft report to the Superintendent.
 - a. In the event a Board member believes a provision(s) of the draft of the annual performance report is not in accord with the provisions agreed to by



REGULATION

COLLINGSWOOD SCHOOL DISTRICT

ADMINISTRATION
R M1240/Page 3 of 3
EVALUATION OF SUPERINTENDENT

a majority of the Board during the annual summary conference, the Board member shall submit in writing their proposed revision(s) to the drafter of the annual performance report. The draft of the annual performance report may be revised by the drafter of the report if the drafter agrees with the Board member's proposed revision. In the event the drafter does not agree with the proposed revision(s), the issue shall be presented to the full membership of the Board of Education in executive session to make a final determination.

4. The draft of the annual performance report shall be presented to the full membership of the Board of Education in executive session for discussion and approval after the draft report has been disseminated to all Board members for review. The Superintendent shall receive a copy of the draft of the annual performance report from the Board President, or Board President's designee, prior to the executive session where the Board is scheduled to discuss and approve.
5. In the event the Superintendent does not agree with a provision(s) in the draft of the annual performance report, the Superintendent shall be provided an opportunity to discuss with the full membership of the Board reconsideration of the disputed provision(s).
6. A majority of the Board's full membership shall approve the draft of the annual performance report before presenting the final annual performance report to the Superintendent.
7. The Superintendent may submit a written response to the final annual performance report, which shall be attached to the report.

D. Nontenured Superintendent of Schools

1. The evaluation procedure for a nontenured Superintendent shall also be completed by July 1 each year.

Adopted: October 27, 2003
Revised: January 27, 2014
Revised: January 25, 2016
Revised: September 25, 2017



EXHIBIT C

REGULATION

COLLINGSWOOD SCHOOL DISTRICT

COMMUNITY
R 9130/Page 1 of 4
PUBLIC COMPLAINTS AND GRIEVANCES

R 9130 PUBLIC COMPLAINTS AND GRIEVANCES

All complaints and grievances addressed to the Board of Education, Board members individually, school officials, or district staff members shall be referred to the Superintendent for consideration in accordance with the following procedures.

A. Complaints Regarding a Teaching Staff Member Other Than Administrator

1. First level

- a. The complainant will be directed to address the matter to the staff member.
- b. The staff member will be directed to discuss the matter directly with the complainant and to make every reasonable effort to explain the difficulty and/or take appropriate action in accordance with district regulations and within his/her authority and district regulations.
- c. The staff member will report the matter, and whatever action may have been taken to resolve the matter, to the Principal.

2. Second level

- a. If the matter cannot be satisfactorily resolved at the first level, the complainant may discuss the matter with the Principal.
- b. The Principal will take all reasonable and prudent steps to resolve the complaint or to explain to the complainant why the matter cannot be resolved as the complainant wishes.

3. Third level

- a. If the matter cannot be satisfactorily resolved at the second level, the complainant may, within ten (10) working days (see Policy No. 9130) of his/her meeting with the Principal, submit to the Superintendent a written request for a conference. The request shall include:
 - (1) The specific nature of the complaint and a brief statement of the facts giving rise to it,
 - (2) The respect in which it is alleged that the complainant or the complainant's child has been unfairly treated or adversely affected, and
 - (3) The remedy sought by the complainant.
- b. A copy of the request for conference will be sent to the Board of Education.



REGULATION

COLLINGSWOOD SCHOOL DISTRICT

COMMUNITY
R 9130/Page 2 of 4
PUBLIC COMPLAINTS AND GRIEVANCES

- c. Within ten (10) working days (see Policy No. 9130) of the receipt of the request, the Superintendent shall conduct a conference, at a time convenient to the complainant, and attempt to resolve the matter informally. The time for conference will be extended if the complainant is unable to schedule a convenient meeting.
 - d. The Superintendent shall record in writing his/her disposition of the complaint and shall, within ten (10) working days (see Policy No. 9130) of the conference, provide a copy of the written disposition to the complainant and to the Board.
4. Fourth level
- a. A complaint that is not resolved by conference with the Superintendent or that seeks a remedy beyond the Superintendent's jurisdiction may be appealed to the Board of Education.
 - b. The complainant may, within ten (10) working days (see Policy No. 9130) of his/her receipt of the Superintendent's written disposition, submit a written request for a hearing before the Board. The request will include a copy of the Superintendent's disposition at Level 3.
 - c. The Board shall, within thirty (30) calendar days (see Policy No. 9130) of the receipt of the request, conduct an informal hearing before a committee of Board members, in which the complainant will present his/her complaint. The Board may, on the petition of the complainant, permit the examination of witnesses. The Board may permit the teaching staff member complained of to testify in his/her own behalf.
 - d. The Board shall, within ten (10) calendar days (see Policy No. 9130) of the hearing, advise the complainant in writing of the Board's disposition of the complaint.
 - e. The complainant will be advised that the Board's decision may be appealed to the Commissioner of Education.
5. Reasonable efforts will be made to expedite a complaint that arises at the end of the school year so that the matter can be resolved before the interruption of summer vacations.

B. Complaints About an Administrative Staff Member

- 1. The procedure set forth in ¶A will be followed and the complainant will be directed to discuss the matter first with the administrator.
- 2. A complaint about a Principal or a central office administrator will omit the second level of the complaint procedure. Appeal of the first level discussion will be made directly to the Superintendent in accordance with ¶A3.



REGULATION

COLLINGSWOOD SCHOOL DISTRICT

COMMUNITY
R 9130/Page 3 of 4
PUBLIC COMPLAINTS AND GRIEVANCES

C. Complaints About a Support Staff Member

1. The procedure set forth in ¶A will be followed and the complainant will be directed to discuss the matter first with the support staff member.
2. Appeal at the second level of the complaint procedure will be to the support staff member's supervisor.
3. A complaint about a support staff supervisor will omit the second level of the complaint procedure. Appeal of the first level discussion will be made directly to the Superintendent in accordance with ¶A3.

D. Complaints About a Program, Practice, or Operation

1. A complaint directed to a matter of district or school policy, procedure, program, or operation, including entitlement programs established by state or federal law, should be addressed, initially, to the administrator or department head most directly concerned with the matter, in accordance with ¶A1.
2. A complaint that cannot be satisfactorily resolved at the first level may be appealed to the Superintendent and, thereafter, the Board in accordance with the procedures set forth in ¶A3 and ¶A4.

E. Complaints About Instructional and Resource materials

1. Complaints about textbooks, library books, reference works, and other instructional materials used in the district will be made in writing and submitted to the Superintendent.
2. The complainant will complete and sign a complaint form available in the Principal's office. The form will include:
 - a. The title, author, and publisher of the work complained of,
 - b. The specific portions or language complained of (by page and item),
 - c. The complainant's familiarity with the work objected to,
 - d. The reasons for the objection,
 - e. The pupils or class for whom the work is intended, and
 - f. The way in which the work is used.



REGULATION

COLLINGSWOOD SCHOOL DISTRICT

COMMUNITY
R 9130/Page 4 of 4
PUBLIC COMPLAINTS AND GRIEVANCES

3. Within ten (10) working days of the receipt of the complaint form, the Superintendent shall appoint a review committee consisting of:
 - a. The head of the department in which the work is being used,
 - b. A teacher in the subject area of the work,
 - c. A library staff member,
 - d. A Board member,
 - e. A lay person knowledgeable in the area of the work, and
 - f. The Principal of a school in which the work is used.
4. The review committee will meet to evaluate the complaint and review the material objected to. The standards used by the committee will be those set forth in Policy No. 2530.
5. The committee will report its findings and recommendations to the Board.
6. The Board will receive the report of the committee. If the Board acts to remove the work complained of or to limit access to the work, its action will be accompanied by a statement of reasons for the removal or limitation.
7. A copy of the committee's report and the Board's action, if any, will be given to the complainant.
8. The complainant will be informed that a decision of the Board may be appealed to the Commissioner of Education.

Adopted: September 26, 2005





PHILIP D. MURPHY
Governor

TAHESHA L. WAY
Lt. Governor

State of New Jersey
DEPARTMENT OF EDUCATION
PO Box 500
TRENTON, NJ 08625-0500

KEVIN DEHMER
Acting Commissioner

SCHOOL ETHICS COMMISSION

October 15, 2024

For Complainants

Roger Chu (Lead Complainant)

[REDACTED] Privacy exception
Collingswood, NJ 08108

For Respondent

Meghan Mikulski

[REDACTED] Privacy exception
Collingswood, NJ 08108

SUBJECT: ROGER CHU, CHRISTINE SHERIDAN CELIA, CHRISTOPHER DILKUS, REGAN KAIDEN, MARY SAVERINO, KATE SELTZER & SARAH SHERMAN v. MEGHAN MIKULSKI, COLLINGSWOOD BOARD OF EDUCATION, CAMDEN COUNTY, SCHOOL ETHICS COMMISSION DOCKET #C79-24

Dear Parties:

Please allow this correspondence to acknowledge the School Ethics Commission's (Commission) receipt of a filing by the named Complainants in connection with the above-captioned matter. In the **Amended Complaint**, which was received by the Commission on October 15, 2024, it is contended that the named Respondent violated the following provisions of the School Ethics Act (Act):

- Count 1: September 23, 2024: *N.J.S.A. 18A:12-24.1(e)*
- Count 2: September 23, 2024: *N.J.S.A. 18A:12-24.1(g)*
- Count 3: September 23, 2024: *N.J.S.A. 18A:12-24.1(i)*
- Count 4: September 23, 2024: *N.J.S.A. 18A:12-24.1(j)*
- Count 5: September 23, 2024: *N.J.S.A. 18A:12-24.1(f)*

Respondent shall have **twenty (20) days from receipt**¹ of the Complaint within which to file a **Written Statement** in accordance with *N.J.A.C. 6A:28-7 et seq.*

Pursuant to *N.J.A.C. 6A:28-7.2*, a Written Statement shall:

1. Fully and completely advise the parties and the Commission as to the nature of Respondent's defenses for each allegation, including any grounds upon which dismissal should be granted.
2. Admit or deny each allegation set forth in the Complaint with specificity. Denials shall fairly meet the substance of the allegations being denied. If Respondent intends in good faith to deny only part of an allegation, Respondent shall specify which parts are true and deny only the remainder.
3. Be signed by Respondent, and Respondent shall certify as to the accuracy of the Written Statement.

In the Written Statement, Respondent may allege that the Complaint is frivolous pursuant to the standard set forth in *N.J.S.A. 18A:12-29(e)*. If Respondent asserts that the Complaint is frivolous, Complainants shall then have twenty (20) days from receipt of the frivolous allegation within which to file a response to the frivolous allegation **only**. *N.J.A.C. 6A:28-7.2(b)*.

Respondent's Written Statement must either be mailed **or** emailed to the Commission and to the named Complainants along with proof of service conforming to the requirements set forth in *N.J.A.C. 6A:28-1.7*. For ease of reference, the Commission's mailing address is School Ethics Commission, c/o New Jersey Department of Education, P.O. Box 500, Trenton, New Jersey 08625, and the Commission's email address is school.ethics@doe.nj.gov.

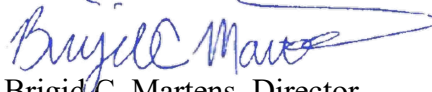
After Respondent files a Written Statement, and Complainants file a response to an allegation of frivolous filing (if asserted by Respondent), the Commission shall decide, by majority vote, whether **probable cause** exists for the allegations in the Complaint. Probable cause shall be found when the facts and circumstances presented in the Complaint and Written Statement would lead a reasonable person to believe that the Act has been violated. If the Commission does not find probable cause, the above-captioned matter will be dismissed. If the Commission finds probable cause for the allegations in the Complaint, the above-captioned matter shall be processed in accordance with *N.J.A.C. 6A:28-9.8*.

Subject to the exceptions set forth at *N.J.A.C. 6A:28-6.6(g)*, the Commission shall hold all information confidential regarding any pending matter until the Commission finds that a school official has violated the Act, or until such time that the above-captioned matter is settled, withdrawn or dismissed.

¹ If mailed, "receipt" shall be deemed to be three (3) days from the date of this notice. If sent electronically, "receipt" shall be deemed to be the same date of this notice.

If you have any questions, please contact our office at school.ethics@doe.nj.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Brigid C. Martens", with a long, sweeping horizontal line extending to the right.

Brigid C. Martens, Director
School Ethics Commission