

MS. NICOLE MARTIN

:

Westwood, NJ 07675

:

BEFORE THE SCHOOL

v.

:

ETHICS COMMISSION

OF NEW JERSEY

MS. KRISTEN PEDERSEN

:

SCHOOL ETHICS ACT

MR. MICHAEL PONTILLO

:

COMPLAINT FORM

I, Nicole Martin, residing at **614 Ward Avenue, Westwood, NJ 07675**, request the School Ethics Commission to consider a complaint against the above-named Respondent(s) whose home addresses are **Westwood, NJ 07675 and Westwood, NJ 07675**, in accordance with the authority of the School Ethics Commission to entertain such complaints under N.J.S.A. 18A:12-21 et seq.

The facts upon which this complaint is based are as follows: *(Please print additional pages as needed. Students should be identified by initials only.)*

1. Statement of facts: Ms. Kristen Pederson endorsed Board candidate Mr. Douglas Cusato from her official Board member account ("Kristen Pederson for WWRSD Board of Education") instead of her personal account. Ms. Pederson also did not make a disclaimer to indicate that the endorsement is one of personal opinion and not as a Board member.

Dates of occurrence: August 31, 2022, October 5, 2022, and October 26, 2022.

I assert this to be a violation of: N.J.S.A. 18A:12-24(b).

2. Statement of facts: Ms. Kristen Pederson endorsed Board candidate Ms. Laura Cooper from her official Board member account ("Kristen Pederson for WWRSD Board of Education") instead of her personal account. Ms. Pederson also did not make a disclaimer to indicate that the endorsement is one of personal opinion and not as a Board member.

Dates of occurrence: September 4, 2022, September 19, 2022, October 5, 2022, October 7, 2022, October 26, 2022, and October 31, 2022.

I assert this to be a violation of: N.J.S.A. 18A:12-24(b).

3. Statement of facts: Ms. Kristen Pederson endorsed Board candidate Ms. Michelle Sembler from her official Board member account ("[Kristen Pederson for WWRSD Board of Education](#)") instead of her personal account. Ms. Pederson also did not make a disclaimer to indicate that the endorsement is one of personal opinion and not as a Board member.

Dates of occurrence: [September 21, 2022](#), [October 5, 2022](#), [October 7, 2022](#), [October 26, 2022](#), and [October 31, 2022](#).

I assert this to be a violation of: [N.J.S.A. 18A:12-24\(b\)](#).

4. Statement of facts: Mr. Michael Pontillo endorsed Board candidate Ms. Michelle Sembler from his official Board member account ("[Michael Pontillo for WWRSD BOE](#)") instead of his personal account. Mr. Pontillo also did not consistently make a disclaimer to indicate that the endorsement is one of personal opinion and not as a Board member.

Dates of occurrence: [August 29, 2022](#), [September 21, 2022](#), [September 27, 2022](#), [October 1, 2022](#), [October 8, 2022](#), [October 15, 2022](#), and [October 25, 2022](#).

I assert this to be a violation of: [N.J.S.A. 18A:12-24\(b\)](#).

5. Statement of facts: Mr. Michael Pontillo endorsed Board candidate Ms. Laura Cooper from his official Board member account ("[Michael Pontillo for WWRSD BOE](#)") instead of his personal account. Mr. Pontillo also did not make a disclaimer to indicate that the endorsement is one of personal opinion and not as a Board member.

Dates of occurrence: [October 1, 2022](#), [October 8, 2022](#), [October 11, 2022](#), [October 15, 2022](#), and [October 25, 2022](#).

I assert this to be a violation of: [N.J.S.A. 18A:12-24\(b\)](#).

6. Statement of facts: Mr. Michael Pontillo endorsed Board candidate Mr. Doug Cusato from his official Board member account ("[Michael Pontillo for WWRSD BOE](#)") instead of his personal account. Mr. Pontillo also did not make a disclaimer to indicate that the endorsement is one of personal opinion and not as a Board member.

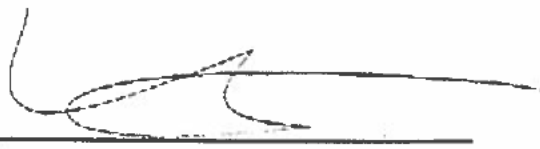
Date of occurrence: [October 25, 2022](#).

I assert this to be a violation of: [N.J.S.A. 18A:12-24\(b\)](#).

For Agency Use Only
Docket Number: _____

WHEREFORE, I, as Complainant, request that the School Ethics Commission find and determine that the above-named Respondent(s) has violated the School Ethics Act and that he or she be subject to such penalty as provided by the Act.

Date: November 4, 2022



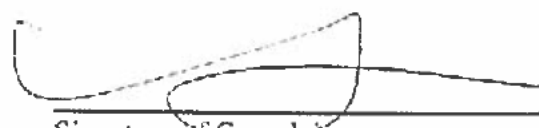
Signature of Complainant
or his or her Attorney

CERTIFICATION UNDER OATH

Nicole Martin, of full age, being duly sworn upon his or her oath according to law deposes and says:

1. I am the complainant in this matter.
2. I have read the 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(c). I am aware that if the respondent alleges that the complaint is frivolous, I shall have 20 days from receipt of the answer to respond to the allegation.
3. The subject matter of this 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.

November 4, 2022
Date:



Signature of Complainant

Sworn and subscribed to before me this 4 day of Nov, 2022.

Notice: All final decisions issued in connection with complaints that come before the School Ethics Commission for review and determination are public records uniformly posted on the Department of Education's website at <http://www.nj.gov/education/legal/>. As a general rule, selective requests to remove a particular decision for reasons of personal preference are not entertained.

