

OXFELD COHEN, P.C.  
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Attorneys for Respondent

IN THE MATTER OF  
THE CERTIFICATES OF  
ANDREA GIUFFRIDA

STATE OF NEW JERSEY  
OFFICE OF ADMINISTRATIVE LAW  
OAL DOCKET NO.: 08548-2012 S

Agency Docket No.: 1112-202

**RESPONSE TO FIRST REQUEST  
FOR ADMISSIONS**

1. You are the holder of a Teacher of Elementary School Certificate of Eligibility With Advanced Standing, issued in March 1994, a Teacher of Students with Disabilities certificate issued in January 2005 and a Learning Disabilities Teacher Consultant certificate, issued in October 2006.

**ANSWER:**

**Admit.**

2. You were hired by the Point Pleasant Board of Education as a Learning Disabilities Teacher Consultant for the 2011-2012 school year.

**ANSWER:**

**Admit.**

3. As part of your job duties at Point Pleasant, you were a member of the Child Study Team at Point Pleasant High School.

**ANSWER:**

**Admit.**

4. The Child Study Team would have regular meetings.

ANSWER:

Admit.

5. James Foley would also attend Child Study Team meetings.

ANSWER:

I can neither admit nor deny this statement. Mr. Foley is employed by the Point Pleasant Board of Education as a SAC. Mr. Foley attended Child Study Team meetings as appropriate. For example, he would attend a meeting if he had experience with the child at issue and/or if he had expertise to bring to bear on the problems being experienced by a child.

6. At a Child Study Team meeting on Tuesday, October 25, 2011, you kissed James Foley.

ANSWER:

I cannot admit or deny this statement. I admit that I kissed Mr. Foley on the cheek, but I am unsure as to whether the date was October 25, 2011.

7. On October 21, 2011, you gave David Drew a hug.

ANSWER:

I can neither admit nor deny this statement. I admit that I gave David Drew a hug, but I am not sure of the date on which this occurred.

8. On October 21, 2011, you kissed David Drew.

ANSWER:

I can neither admit nor deny this statement. I admit I kissed David Drew on the cheek, I am not sure of the date in which this occurred.

9. During your time at the Point Pleasant School District, you engaged David Drew in conversation and would make inappropriate comments on your physical appearance.

ANSWER:

I cannot admit or deny this statement. I admit that I engaged David Drew in conversations during my time at Point Pleasant School District, I deny that I made inappropriate comments to Mr. Drew about my physical appearance.

10. On October 13, 2011, you grabbed Patrick Brady's buttocks.

ANSWER:

Denied.

11. You were suspended with pay on November 22, 2011.

ANSWER:

Admit.

The Board of Education voted on November 21, 2011 to suspend me with pay effective November 22.

12. Your employment with the Point Pleasant Board of Education was terminated on January 20, 2012.

ANSWER:

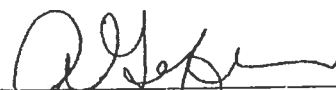
Admit.

CERTIFICATION IN LIEU OF OATH OR AFFIDAVIT

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment for contempt of court.

DATE:

1-10-13

  
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ANDREA GIUFFRIDA