



State of New Jersey
OFFICE OF ADMINISTRATIVE LAW
9 Quakerbridge Plaza
P.O. Box 049
Trenton, New Jersey 08625-0049
(609) 438-6316

Barry E. Moscovitz
Acting Director and Chief
Administrative Law Judge

Candice Hendricks
Assistant Director

May 29, 2025

By E-mail: opra+request-76927-43823c9f@requests.opramachine.com

Anonymous

Re: OPRA Request

Dear Requestor:

The Office of Administrative Law ("OAL") received your request under the Open Public Records Act on May 29, 2025. You requested:

"Copy of all motions (made by both petitioners and respondent), petitions pro se, and Judge Bogan's May 28, 2025 order related to the following OAL docket numbers:

OAL DKT No. EDU 08973-25 (Shah vs. Monroe BOE)

OAL DKT No. EDU 08580-25 (Zawacki vs Monroe BOE)

OAL DKT No. EDU 08593-25 (Skurbe vs Monroe BOE)

OAL DKT No. EDU 08244-25 (Marozine vs. Monroe BOE)

OAL DKT No. EDU 08550-25 (Melam vs. Monroe BOE)."

In response to your request, please see attached responsive records.

Sincerely,

/s/Candice G. Hendricks
OPRA Custodian/Assistant Director
Judicial Standards and Procedures



State of New Jersey
OFFICE OF ADMINISTRATIVE LAW

ORDER ON
EMERGENT RELIEF

ERIC MAROZINE,

Petitioner,

v.

BOARD OF EDUCATION OF TOWNSHIP

OF MONROE,

Respondent.

OAL DKT. NO. EDU 08244-25

AGENCY DKT. NO. 135-5/25

(CONSOLIDATED)

AND

PRADEEP MELAM,

Petitioner,

v.

BOARD OF EDUCATION OF TOWNSHIP

OF MONROE,

Respondent.

OAL DKT. NO. EDU 08550-25

AGENCY DKT. NO. 141-5/25

AND

ROSHNI SHAH,

Petitioner,

v.

BOARD OF EDUCATION OF TOWNSHIP

OF MONROE,

Respondent.

OAL DKT. NO. EDU 08973-25

AGENCY DKT. NO. 150-5/25

AND

CRISTINA BOLUSI ZAWACKI,

Petitioner,

v.

**BOARD OF EDUCATION OF TOWNSHIP
OF MONROE,**

Respondent.

OAL DKT. NO. EDU 08580-25

AGENCY DKT. NO. 148-5/25

AND

CHRISTINE SKURBE,

Petitioner,

v.

**BOARD OF EDUCATION OF TOWNSHIP
OF MONROE,**

Respondent.

OAL DKT. NO. EDU 08593-25

AGENCY DKT. NO. 138-5/25

**Eric Marozine, Pradeep Melam, Roshni Shah, Cristina Bolusi Zawacki, and
Christine Skurbe, petitioners, pro se**

**Rita F. Barone, Esq., Robert M. Tosti¹, Esq. for respondent (Flanagan, Barone
& O'Brien, LLC, attorneys)**

BEFORE **MARY ANN BOGAN, ALJ:**

STATEMENT OF THE CASE AND PROCEDURAL HISTORY

Petitioners Eric Marozine, Pradeep Melam, Roshni Shah, Cristina Bolusi Zawacki, and Christine Skurbe (petitioners) filed a Verified Petition of Appeal (Petition)

¹ Appeared for oral argument on May 23, 2025.

and Motion for Emergent Relief with the Commissioner of Education. The Office of Controversies and Disputes of the Department of Education (Department) transmitted the contested case to the Office of Administrative Law, where it was filed on May 14, 2025.

The petitioners demand the immediate reinstatement by the Monroe School District Board of Education (Board) of Dr. Chari Chanley, Superintendent of the Monroe School District, based on violations of due process, board policy, and law. The respondent Board, in opposition, contends among other assertions that petitioners lack standing to bring a claim as the decision to place Dr. Chanley on paid administrative leave is a confidential personnel matter between the Board and Dr. Chanley.

Oral argument was heard on May 23, 2025.

FACTUAL DISCUSSION

During the May 5, 2025, Board meeting, the Board placed Dr. Chanley on administrative leave with pay after the evaluation of the superintendent during executive session. Petitioners, who are residents, taxpayers, and parents of children who attend the District schools, allege that the Board took improper action when it considered Dr. Chanley's employment status, placed Dr. Chanley on paid administrative leave, and did not follow proper procedures. Specifically, the petitioners state the Board placed Dr. Chanley on leave based solely on "what we heard here tonight" and did not provide Dr. Chanley with prior notice or an opportunity to respond, did not properly document and investigate the matter, violated Dr. Chanley's due process rights, and did not follow District policy 0164, Conduct of Board meeting, or the Roberts Rules of Order. The petitioners also seek relief from the Board's arbitrary and capricious decision to remove Dr. Chanley and its pattern of swiftly removing high-performing administrators. The Board in its action has abused its authority, demoralized the school, impacted the District's ability to attract talented educators, and caused the loss of experienced leaders. The petitioners further assert, Dr. Chanley's absence materially affected the District because she has the most experience and is "deep into" projects that are timely and complex. For example, these projects include, under the leadership of Dr. Chanley,

the establishment of a full day kindergarten. Petitioners maintain this project is now on hold and will not be started as previously planned. Dr. Chanley was also working on school travel safety issues and working to restore the operations of a District school. Furthermore, the petitioners find that the Board's action to place the interim superintendent into the role of the superintendent is insufficient to administrate the District schools.²

The Board maintains this is a confidential personnel matter between the employing Board of Education and an employee superintendent in which the Board took action to place Dr. Chanley on paid administrative leave. The Board points out that this action is not a final personnel action for Dr. Chanley, who continues to "enjoy[] contractual tenure."

LEGAL ANALYSIS AND CONCLUSION

As a threshold matter, a party must have standing to bring a claim before the Commissioner of Education. New Jersey follows a "liberal approach on the issue of standing." Crescent Park Tenants Ass'n v. Realty Equity Corp. of N.Y., 58 N.J. 98, 101, 107–11 (1971). Even under this approach, though, standing is limited to "situations where the litigant's concern with the subject matter evidence[s] a sufficient stake and real adverseness," preventing litigation by those who are "merely interlopers or strangers to the dispute." Id. at 107.

The petitioners argue that they have standing because a petitioner is a former Board president who has knowledge of the previous Board actions, and because all petitioners are residents and parents of school children who have knowledge of the Board's actions and are affected by the consequences of the Board's actions, especially the Board's pattern of removing administrators, without cause.

² In a late post-hearing submission, the petitioners state the Board did not appoint an interim superintendent because the appointment of the assistant superintendent to also serve as superintendent is inconsistent with the scope of the assistant superintendent's main role to shape academic policy and curriculum. Whereas the "role of [the superintendent encompasses a broader scope, including operational management, fiscal oversight, strategic planning, community relations, and governance with the Board of Education." The Board in its response states this response demonstrates the "speculative nature of the relief sought here."

The respondent states that the petitioners lack standing to bring this action. Respondents rely upon Loigman v. Twp of Middletown, 297 N.J. Super. 287 (App. Div. 1997). In Loigman, the plaintiff taxpayer sought to enforce a collective bargaining agreement between a Police Union and the Township. In addition to holding that this taxpayer lacked standing to enforce a public sector labor agreement, the court also noted that parents do not have standing in a case involving striking schoolteachers. While the court recognizes as I do that parents have a legitimate concern in the outcome of disputes such as a case involving striking teachers and, like here, changes in who administers the schools that their children attend in the community where they reside and pay taxes, the petitioners' interest does not provide legal standing to bring this action.

The Board further relies on Joly v. Palmieri, OAL Dkt. No. EDU 03000-25 decided May 8, 2025, to demonstrate that a similar motion has already been decided. In Joly, a board member was denied requested emergent relief to set aside an executive county superintendent's decision to appoint a Board president.

I **CONCLUDE** that the petitioners herein cannot bring an action on behalf of an employee personnel issue that an administrator may have with the District.

Under N.J.S.A. 18A:6-9, the Commissioner's jurisdiction is defined, and is limited to, "controversies and disputes arising under the school laws." In Dunellen Board of Education v. Dunellen Education Association, 64 N.J. 17, 23 (1973), the New Jersey Supreme Court concluded that "the Legislature enacted provisions entrusting school supervision and management to local school boards . . . subject to the supervisory control [of] . . . the State Commissioner of Education."

The regulations governing such disputes before the Commissioner of Education provide that "[w]here the subject matter of the controversy is a particular course of action by a district board of education or any other party subject to the jurisdiction of the Commissioner, the petitioner may include with the petition of appeal, a separate motion for emergent relief or a stay of that action pending the Commissioner's final decision in

the contested case.” N.J.A.C. 6A:3-1.6(a). The regulations further provide that the Commissioner may “[t]ransmit the motion to the OAL for immediate hearing on the motion.” N.J.A.C. 6A:3-1.6(c)(3).

As set forth in N.J.A.C. 1:6A-12.1(e), N.J.A.C. 6A:3-1.6(b) and N.J.A.C. 6A:14-2.7(s), an application for emergent relief will be granted only if it meets the following four requirements:

1. The petitioner will suffer irreparable harm if the requested relief is not granted;
2. The legal right underlying the petitioner’s claim is settled;
3. The petitioner has a likelihood of prevailing on the merits of the underlying claim; and
4. When the equities and interests of the parties are balanced, the petitioner will suffer greater harm than the respondent will suffer if the requested relief is not granted.

The moving party must demonstrate each element “clearly and convincingly.” Waste Management of N.J. v. Union County Utilities Authority, 399 N.J. Super. 508, 520 (App. Div. 2008). Emergent relief is designed “to ‘prevent some threatening, irreparable mischief, which should be averted until opportunity is afforded for a full and deliberate investigation of the case.’” Crowe v. DeGioia, 90 N.J. 126, 132 (citation omitted) (1982); see also N.J.A.C. 1:1-12.6(b) (citing Crowe, 90 N.J. 126, which echoes the regulatory standard for this extraordinary relief). It is well established that a moving party has the burden of proving each of the four elements of emergent relief.

Turning to the first criteria, it is well settled that relief should not be granted except “when necessary to prevent irreparable harm.” Crowe, 90 N.J. at 126. In this regard, harm is generally considered irreparable if it cannot be adequately redressed by monetary damages. Id. at 132–33. Moreover, the harm must be substantial and immediate. Judice’s Sunshine Pontiac, Inc. v. Gen. Motors Corp., 418 F. Supp. 1212, 1218 (D.N.J. 1976) (citation omitted). More than a risk of irreparable harm must be demonstrated. Cont’l Grp., Inc. v. Amoco Chems. Corp., 614 F.2d 351, 359 (3d Circ.

1980). The requisite for injunctive relief is a “clear showing of immediate irreparable injury,” or a “presently existing actual threat; (an injunction) may not be used simply to eliminate a possibility of a remote future injury, or a future invasion of rights, be those rights protected by statute or by the common law.” Ibid. (citation omitted.)

In this case, there is no immediate or irreparable harm. It also has not been ascertained what harm has been caused since the superintendent has not been terminated and any harm that may be incurred is speculative. Currently the superintendent is on paid leave with the possibility of either party or both parties taking further action.

For the foregoing reasons, I **CONCLUDE** that petitioners have not demonstrated that they will suffer irreparable harm if the requested emergent relief is not granted.

Although all four standards for emergent relief must be met, the three remaining prongs of the standards for emergent relief will be addressed.

The second requirement is that emergent relief “should be withheld when the legal right underlying plaintiff’s claim is unsettled.” Crowe, 90 N.J. at 133 (citing Citizens Coach Co. v. Camden Horse R.R. Co., 29 N.J. Eq. 299, 304–305). The petitioners assert that the Board took action that is procedurally deficient. Here the legal right underlying petitioners’ claim is not settled. Even if the Board may have violated Dr. Chanley’s due process rights, there is no settled legal right to allow parents to intervene in a personnel matter between the superintendent and the Board.

For the foregoing reasons, I **CONCLUDE** that petitioners did not demonstrate that the legal right to enjoin the Board from placing Dr. Chanley on paid administrative leave is settled.

Under the third emergent relief prong, “a plaintiff must make a preliminary showing of a reasonable probability of ultimate success on the merits.” Crowe, 90 N.J. at 133 (citing Ideal Laundry Co. v. Gugliemone, 107 N.J. Eq. 108, 115–16 (E. & A. 1930)). Here, the likelihood of petitioners’ success on the merits is unclear.

The decisions of local governmental bodies, such as school boards of education, carry the presumption of validity and a showing of arbitrary, capricious, or unreasonable action. Palamar Constr., Inc. v. Pennsauken, 196 N.J. Super. 241, 250 (App. Div. 1983). The burden of proving that the action of the governmental agency was arbitrary and capricious lies with the petitioner. J.M. by his guardian D.M. v. Hunterdon Cent. Reg'l High Sch. Dist., 96 N.J.A.R. 2d (EDU) 415, 419 (December 4, 1995), Comm'r. (January 18, 1996).

For the foregoing reasons, I **CONCLUDE** that petitioners have not demonstrated a likelihood of success on the merits.

The final requirement relates to the equities and interests of the parties. Crowe, 90 N.J. at 134. The petitioners have not demonstrated that when the equities and interests are balanced, petitioners will suffer greater harm than the Board if the relief is not granted. N.J.A.C. 6A:3-1.6(b)(4).

Furthermore, petitioners' varied claims stating that the Board's actions violated the open public meetings act, caused ethical violations against various board members, violated procedural due process, and violated the evaluation and personnel procedures are subject to different venues and preclude this forum from making a decision herein.

I **CONCLUDE** that petitioners would not suffer greater harm than the District if the requested emergent relief is not granted. Accordingly, I **CONCLUDE** that the petitioners did not satisfy all four requirements for emergent relief.

Therefore, I **CONCLUDE** that petitioners' request for emergent relief be **DENIED**.

ORDER

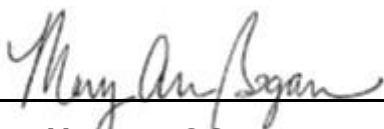
For the foregoing reasons set forth above, it is hereby **ORDERED** that petitioners' request for emergent relief is **DENIED**.

This order on application for emergency relief shall remain in effect until the Commission makes a decision as to whether or not it will return the case for a decision on the merits in this matter.

This order on application for emergency relief may be adopted, modified or rejected by **ACTING COMMISSIONER OF THE DEPARTMENT OF EDUCATION**, who/which by law is authorized to make a final decision in this matter. The final decision shall be issued without undue delay, but no later than forty-five days following the entry of this order. If **ACTING COMMISSIONER OF THE DEPARTMENT OF EDUCATION** does not adopt, modify or reject this order within forty-five days, this recommended order shall become a final decision on the issue of emergent relief in accordance with N.J.S.A. 52:14B-10.

May 27, 2025

DATE



MARY ANN BOGAN, ALJ

MAB/nn

c: Clerk OAL-T

Pro Se Petition of Appeal

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Date: 5/7/24

Section I. Parties' Information

Petitioner's information

Name: Eric Marozine

Address: [REDACTED]

Daytime phone/cell phone [REDACTED]

Email address: [REDACTED]

Respondent's information:

Name: Monroe Township Board of Education

Address: 423 Buckleu Ave Monroe Township NJ 08831

Phone number: 732-521-1500

Email address (optional):

Section II. Statement of Specific Allegations and Essential Supporting Facts

Petitioner hereby requests the Commissioner of Education to consider a controversy which has arisen between petitioner and respondent pursuant to the authority of the Commissioner to hear and determine controversies under the school law (N.J.S.A. 18A:6-9), by reason of the following facts:

(In this section, please set forth in as many itemized paragraphs as are necessary to identify the specific allegation(s), and the supporting facts, which constitute the basis for the dispute. Please attach additional sheets as necessary.)

See attached

Section III. Relief Requested

Wherefore, petitioner requests the following relief:

(In this section, please set forth the relief desired. Please attach additional sheets as necessary.)

Immediately reinstate Monroe Township
Superintendent Dr. Chari Chanley.

Petitioner Signature: Eric Marozine

Date: 5/7/25

Section IV. Statement of Verification

Eric Marozine, of full age, being duly sworn upon his or her oath according to law deposes and says
name of petitioner

- I am the petitioner in the foregoing matter.
- I have read the petition and aver that the facts contained therein are true to the best of my knowledge and belief.

Petitioner signature: _____



Date: 5/7/25

Section V. Proof of Service

You must provide a copy of this petition of appeal to the respondent (or their attorney). Please see the options below.

1. Deliver a copy of the petition in person. Ask the recipient to sign a receipt. Include a copy of the receipt when you file this form.
2. Mail a copy of the petition by certified mail. Include a copy of the certified mailing receipt when you file this form.
3. Mail a copy of the petition by regular mail. Prepare and sign a affidavit or certificate of service. Include a copy of the affidavit certificate of service when you file this form.

Section VI. If Seeking Relief on an Emergent Basis

If relief is sought on an emergency basis, the petitioner must additionally file a motion accompanied by a memorandum addressing the standard for granting such relief pursuant to Crowe v. DeGioia, 90 N.J. 126 (1982); see N.J.A.C. 6A:3-

1.6. This means the petitioner must demonstrate that:

- The petitioner will suffer irreparable harm if the requested relief is not granted;
- The legal right underlying petitioner's claim is settled;
- The petitioner has a likelihood of prevailing on the merits of the underlying claim; and
- When the equities and interests of the parties are balanced, the petitioner will suffer greater harm than the respondent will suffer if the requested relief is not granted.

If possible, please file your Petition of Appeal by emailing it to ControversiesDisputesFilings@doe.nj.gov. If you are unable to file by email, please mail your Petition of Appeal to:

Commissioner of Education
c/o Director of Office of Controversies and Disputes
New Jersey State Department of Education
P.O. Box 500,
Trenton, New Jersey 08625.

Statement of Allegations Regarding the Improper Suspension of Superintendent Dr. Chari Robynne Chanley

It is alleged that the Monroe Township Board of Education acted improperly and in violation of established legal procedures when it suspended Superintendent Dr. Chari Robynne Chanley during the early morning hours of May 6, 2025. The suspension vote reportedly took place shortly after 1:00 a.m., under circumstances that raise serious concerns regarding transparency, legality, and adherence to New Jersey state guidelines.

The stated reason for the suspension — “what we heard here tonight” — lacks specificity, objectivity, and legal grounding. This vague rationale does not satisfy the standards required under New Jersey law for the suspension of a Superintendent. Moreover, one board member was not present for the vote, which calls into question whether the board was acting with full representation and due deliberation.

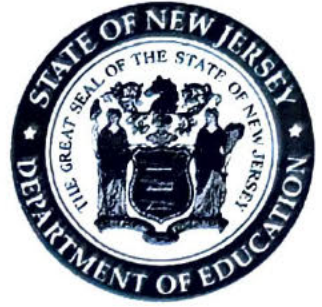
Critically, the Board failed to hold a public hearing or provide Dr. Chanley with a fair opportunity to respond to any formal allegations, as required under due process protections. The absence of a public hearing and the lack of transparency in both process and reasoning are clear violations of the Superintendent’s legal rights and contradict the procedural requirements outlined in New Jersey statutes governing school district governance.

This sequence of events appears to represent an arbitrary and potentially retaliatory action, rather than a lawful, policy-compliant decision by the Board. The community deserves accountability, and Dr. Chanley is entitled to due process under the law.

We call for immediate review of this action by appropriate state authorities, reinstatement of Dr. Chanley pending a lawful and fair process, and full public disclosure of the facts and legal basis surrounding the Board’s decision.

Pro Se Petition of Appeal

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Date: 05/09/2025

Section I. Parties' Information

Petitioner's information

Name: Pradeep Melam

Address:

Daytime phone/cell phone:

Email address:

Respondent's information:

Name: Monroe Township Board of Education

Address: 423 Buckelew Ave Monroe Twp, NJ 08831

Phone number: 732-521-1500

Email address (optional):

Section II. Statement of Specific Allegations and Essential Supporting Facts

Petitioner hereby requests the Commissioner of Education to consider a controversy which has arisen between petitioner and respondent pursuant to the authority of the Commissioner to hear and determine controversies under the school law (N.J.S.A. 18A:6-9), by reason of the following facts:

(In this section, please set forth in as many itemized paragraphs as are necessary to identify the specific allegation(s), and the supporting facts, which constitute the basis for the dispute. Please attach additional sheets as necessary.)

See the attached statement of allegations

Section III. Relief Requested

Wherefore, petitioner requests the following relief:

(In this section, please set forth the relief desired. Please attach additional sheets as necessary.)

It is requested that Superintendent Chari R. Chanley be allowed to return to work immediately as the Superintendent of Schools as the vote to put her out on administrative leave was not legally carried out.

Petitioner Signature:

A handwritten signature in black ink, appearing to read "Pradeep Melam", is written over a horizontal line.

Date: 05/09/2025

Section IV. Statement of Verification

Pradeep Melam, of full age, being duly sworn upon his or her oath according to law deposes and says
name of petitioner

- I am the petitioner in the foregoing matter.
- I have read the petition and aver that the facts contained therein are true to the best of my knowledge and belief.

Petitioner signature:  Date: 5/9/25

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1.6. This means the petitioner must demonstrate that:

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- The legal right underlying petitioner's claim is settled;
- The petitioner has a likelihood of prevailing on the merits of the underlying claim; and
- When the equities and interests of the parties are balanced, the petitioner will suffer greater harm than the respondent will suffer if the requested relief is not granted.

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Commissioner of Education
c/o Director of Office of Controversies and Disputes
New Jersey State Department of Education
P.O. Box 500,
Trenton, New Jersey 08625.

Statement of allegations regarding the Improper administrations leave of Superintendent Chari R Chanley

On Monday, May 5, 2025 a Board of Education meeting was held at the Monroe Township High School. The meeting was very long as there was much controversy over the Superintendent's recommendation to reapprove Dr. Orselina Cetta as the Woodland School Principal. 5 Board members had abstained at the March 2025 meeting and Dr. Cetta was not approved as she did not receive the 5 votes needed for approval. Dr. Chari Chanley, Superintendent of Schools put her recommendation to approve Dr. Cetta back on the agenda for May 5, 2025. During the public comment section of the meeting, parents, students, teachers and administrators gave testimony on why Dr Cetta should be approved by the Board. It was about 2 hours of public comment. There was not 1 negative comment made regarding Dr. Cetta.

Board members made statements that they usually don't do it but they were changing their mind and voting to approve Dr. Cetta. It was obvious that some Board members were not happy this item was back on the agenda. The Board went into closed session after this as the last item on the agenda. The only item listed to be discussed on the agenda in closed session was the Superintendent's Evaluation. Upon returning from Closed Session, the President of the Board, Katie Fabiano announced that there would be no public comment section for closed session items because no one was present in the audience.

Katie Fabiano was about to adjourn the meeting when Board member Gail DiPane called out and said she wanted to make a motion to put the superintendent on administrative leave "based on what we heard here tonight". What they heard was praise for Dr. Cetta and extreme thanks to Dr. Chanley for putting her back on the agenda. Board member Gazala Bohra and Peter Tufano were visibly upset about this and tried speaking up but Katie Fabiano went right to a vote. The motion passed with Katie Fabiano and Peter Piro both voting.

It has been widely known since 2022 that Katie Fabiano was conflicted on all matters dealing with Chari Chanley because of the various litigation her husband was involved in that attempted to fire Dr. Chanley. Katie Fabiano never voted on any matter involving Dr. Chanley since being on the Board of Education. Monday, May 5, 2025 was the first vote Katie Fabiano took on Dr. Chanley and it was to put her on administrative leave. As the parent of 2 kids, and regularly attending and observing and advising as parent in most of Board meetings for last 8 years, I saw the procedure and process to put an employee on administrative leave. There is discussion with the Board and



there is legal consultation that takes place. It is not a random motion made at a meeting without any discussion of the full board. It was posted on social media by both Gazala Bohra and Peter Tufano that there was no discussion in closed session to put Dr. Chanley on administrative leave. While they did not disclose what the conversation in closed session was, they said this was not discussed. There is a case currently pending against Katie Fabiano last year regarding her reversing an already approved medical leave of absence for Dr. Chanley. It was approved in April 2024 and Katie reversed the terms of the leave as Dr. Chanley was already on the medical leave. It was clear that Katie Fabiano was using her role as the President to go after Dr. Chanley last year and she did again this past Monday, May 5, 2025 when she took a vote to put Dr. Chanley on administrative leave. Due to the pending case against her, she should have abstained.

Additionally, Peter Piro is a Board member that is widely seen as a conflicted Board member. He was a former employee and resigned under Dr. Chanley. He ran his campaign for Board of Education citing that he wanted to get rid of Dr. Chanley. Recently, he authored a letter to a resident in which he broke confidentiality, spoke about personnel matter regarding Dr. Cetta and publicly evaluated Dr. Chanley. All of this is a clear violation of the law and several ethics codes. Peter Piro also should not have voted on the illegal motion made by Gail DiPane to put Dr. Chanley on administrative leave.

Finally, the motion itself was illegal in the fact that the Board operates under Robert's Rules of Order. At the time Gail DiPane made the motion, she did not have the floor nor was it in the agenda that such actions could be taken. This motion should have come under the Other Board Business section of the meeting. If the administrative leave of the superintendent was to be discussed in closed session, it would have legally needed to be on the agenda so that the public was aware of it. As I stated earlier, Board members have confirmed there was no such conversation in closed session. So when Gail DiPane made her motion, it was not an item that was from closed session therefore it was not the proper time for it. There are times when the Board has a discussion in closed session and it results in action being taken. However this is not the case. The Board did not discuss putting the superintendent on administrative leave in closed session.

In conclusion, Dr. Chanley should be allowed to return to work as the vote and process used to put her on administrative leave was not legally carried out. Dr. Chanley is entitled to due process as outlined in NJ statutes governing school districts. The Board of Education failed to do so and as a result has put the district at great risk for litigation against it.

A handwritten signature in black ink, appearing to read "M. Piro", is located in the bottom right corner of the page.

Pro Se Petition of Appeal

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Date: May 9, 2025



Section I. Parties' Information

Petitioner's information

Name: Peter Tufano

Address: [REDACTED]

Daytime phone/cell phone: [REDACTED]

Email address: [REDACTED]

Respondent's information:

Name: Monroe Board of Education

Address: 423 Buckelew Ave, Monroe Twp, NJ 08831

Phone number: 732-521-1500

Email address (optional):

Section II. Statement of Specific Allegations and Essential Supporting Facts

Petitioner hereby requests the Commissioner of Education to consider a controversy which has arisen between petitioner and respondent pursuant to the authority of the Commissioner to hear and determine controversies under the school law (N.J.S.A. 18A:6-9), by reason of the following facts:

(In this section, please set forth in as many itemized paragraphs as are necessary to identify the specific allegation(s), and the supporting facts, which constitute the basis for the dispute. Please attach additional sheets as necessary.)

I have attached my statement of allegations

Section III. Relief Requested

Wherefore, petitioner requests the following relief:

(In this section, please set forth the relief desired. Please attach additional sheets as necessary.)

I am requesting that Dr. Chanley not be kept on administrative leave and continues as the Superintendent of the Monroe Township School District. I am also requesting that the Dept of Education suspend Katie Fabiano as a Board

Petitioner Signature: Peter Tufano

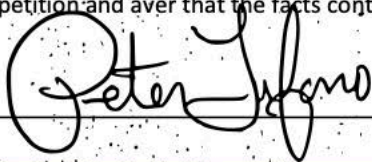
Date: May 9, 2025

Section IV. Statement of Verification

Peter Tufano, of full age, being duly sworn upon his or her oath according to law deposes and says
name of petitioner

- I am the petitioner in the foregoing matter.
- I have read the petition and aver that the facts contained therein are true to the best of my knowledge and belief.

Petitioner signature:



Date: May 9, 2025

Section V. Proof of Service

You must provide a copy of this petition of appeal to the respondent (or their attorney). Please see the options below.

1. Deliver a copy of the petition in person. Ask the recipient to sign a receipt. Include a copy of the receipt when you file this form.
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3. Mail a copy of the petition by regular mail. Prepare and sign a affidavit or certificate of service. Include a copy of the affidavit certificate of service when you file this form.

Section VI. If Seeking Relief on an Emergent Basis

If relief is sought on an emergency basis, the petitioner must additionally file a motion accompanied by a memorandum addressing the standard for granting such relief pursuant to Crowe v. DeGioia, 90 N.J. 126 (1982); see N.J.A.C. 6A:3-

1.6. This means the petitioner must demonstrate that:

- The petitioner will suffer irreparable harm if the requested relief is not granted;
- The legal right underlying petitioner's claim is settled;
- The petitioner has a likelihood of prevailing on the merits of the underlying claim; and
- When the equities and interests of the parties are balanced, the petitioner will suffer greater harm than the respondent will suffer if the requested relief is not granted.

If possible, please file your Petition of Appeal by emailing it to ControversiesDisputesFilings@doe.nj.gov. If you are unable to file by email, please mail your Petition of Appeal to:

Commissioner of Education
c/o Director of Office of Controversies and Disputes
New Jersey State Department of Education
P.O. Box 500,
Trenton, New Jersey 08625.

Statement of allegations:

I am a Board of Education Member in Monroe Township, NJ. I have sat and watched for the last year the Board President, Katie Fabiano go after Dr. Chanley at various times. Since Katie Fabiano has taken over as President of the Board of Education, it has been apparent that she was not in support of Dr. Chanley simply because she had a good relationship with the former Board President Chrissy Skurbe. On numerous occasions, board discussions always revolve around former board President Chrissy Skurbe and certain board members disdain for her.

At the May 5, 2025 Board of Education there was much controversy over the Superintendent's recommendation to reapprove Dr. Orselina Cetta as the Woodland School Principal. I was not sure how my fellow board members were going to vote and I made a statement that I thought it was terrible what this Board was doing to her as there was no reason the Board had to withhold their approval. It is my opinion that they were trying to withhold renewal for her because she was hired by Dr. Chanley under the Board leadership of Chrissy Skurbe. It is my opinion that Katie Fabiano orchestrated the vote to put Chari Chanley on administrative leave as retaliation for Dr. Chanley putting Dr. Cetta back on the May 5th agenda for renewal.

During the closed session portion of the May 5th meeting, of which I was part of, the Board discussed the superintendent's evaluation. At no time did any board member make a recommendation to put the superintendent on administrative leave. While the Board Attorney was in closed session, he was not consulted about putting the superintendent on leave. When we emerged from closed session, I had no idea Gail DiPane was making a motion to put the superintendent on leave. There was zero discussion. President Katie Fabiano went right to a vote. It was all very calculated and executed as a surprise so no one could react fast enough to stop it.

It should be mentioned that this is the first time Katie Fabiano ever voted on any item dealing with the Superintendent. As a Board Member, we were previously given a legal opinion written by the former board attorney that set forth all the reasons they believed she was conflicted. The Board fired him last year as soon as Katie Fabiano took control as President. As a Board member I have witnessed first-hand Katie Fabiano going against attorney advice and taking votes contrary to what was legally advised.

Additionally, Peter Piro is a Board member that has a personal vendetta against Chari Chanley from when he was an employee. He blamed her and Chrissy Skurbe for things

that were not true in his resignation letter. Recently, he authored a letter to a resident in which he broke confidentiality, spoke about personnel matter regarding Dr. Cetta and publicly evaluated Dr. Chanley. All of this is a clear violation of the law and several ethics codes. Peter Piro also should not have voted on Chari Chanley at the May 5th meeting.

In conclusion, Dr. Chanley should be allowed to return to work as the vote and process used to put her on administrative leave was not legally carried out. The Board of Education has put the district at great risk for litigation against it. Additionally, the Department of Education should suspend Katie Fabiano for her actions against Dr. Chanley.

Pro Se Petition of Appeal

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Date: 5/12/2025

Section I. Parties' Information

Petitioner's information

Name: Cristina Bolusi Zawacki

Address: [REDACTED]

Daytime phone/cell phone: [REDACTED]

Email address: [REDACTED]

Respondent's information:

Name: Monroe Township Board of Education

Address: 423 Buckelew Avenue, Monroe Township, NJ 08831

Phone number: 732-251-1500

Email address (optional):

Section II. Statement of Specific Allegations and Essential Supporting Facts

Petitioner hereby requests the Commissioner of Education to consider a controversy which has arisen between petitioner and respondent pursuant to the authority of the Commissioner to hear and determine controversies under the school law (N.J.S.A. 18A:6-9), by reason of the following facts:

(In this section, please set forth in as many itemized paragraphs as are necessary to identify the specific allegation(s), and the supporting facts, which constitute the basis for the dispute. Please attach additional sheets as necessary.)

See attached.

Section III. Relief Requested

Wherefore, petitioner requests the following relief:

(In this section, please set forth the relief desired. Please attach additional sheets as necessary.)

Immediate reinstatement of Monroe Township Superintendent Dr. Chari Chanley.

Petitioner Signature: _____

Date: 5/12/2025

Section IV. Statement of Verification

Cristina Bolusi Zawacki

name of petitioner

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

- I am the petitioner in the foregoing matter.
- I have read the petition and aver that the facts contained therein are true to the best of my knowledge and belief.

Petitioner signature:



Date: 5/12/2025

Section V. Proof of Service

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1. Deliver a copy of the petition in person. Ask the recipient to sign a receipt. Include a copy of the receipt when you file this form.
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3. Mail a copy of the petition by regular mail. Prepare and sign a affidavit or certificate of service. Include a copy of the affidavit certificate of service when you file this form.

Section VI. If Seeking Relief on an Emergent Basis

If relief is sought on an emergency basis, the petitioner must additionally file a motion accompanied by a memorandum addressing the standard for granting such relief pursuant to Crowe v. DeGioia, 90 N.J. 126 (1982); see N.J.A.C. 6A:3-

1.6. This means the petitioner must demonstrate that:

- The petitioner will suffer irreparable harm if the requested relief is not granted;
- The legal right underlying petitioner's claim is settled;
- The petitioner has a likelihood of prevailing on the merits of the underlying claim; and
- When the equities and interests of the parties are balanced, the petitioner will suffer greater harm than the respondent will suffer if the requested relief is not granted.

If possible, please file your Petition of Appeal by emailing it to ControversiesDisputesFilings@doe.nj.gov. If you are unable to file by email, please mail your Petition of Appeal to:

Commissioner of Education
c/o Director of Office of Controversies and Disputes
New Jersey State Department of Education
P.O. Box 500,
Trenton, New Jersey 08625.

Statement of Allegations Regarding the Improper Suspension of Superintendent Dr. Chari Chanley

It is alleged that the Monroe Township Board of Education violated established legal procedures and acted improperly in its suspension of Superintendent Dr. Chari Chanley during the early morning hours of May 6, 2025. The vote, which reportedly took place shortly after 1:00 a.m., occurred under troubling circumstances that raise serious concerns about transparency, legality, and compliance with New Jersey state law.

The justification provided for Dr. Chanley's suspension—"What we heard here tonight"—is alarmingly vague, lacking the specificity, objectivity, and legal foundation required under New Jersey statutes. Such a nebulous rationale fails to meet the legal standards for removing a superintendent and reflects an apparent disregard for due process.

Adding to the procedural irregularities, one board member was absent from the vote. This calls into question whether the decision was made with full representation and thorough deliberation, as required by law and ethical governance standards.

Most critically, the Board did not convene a public hearing nor did it afford Dr. Chanley the opportunity to respond to any formal allegations—fundamental protections guaranteed under due process. The absence of public deliberation, coupled with the lack of transparency in both process and rationale, constitutes a clear violation of Dr. Chanley's legal rights and contradicts statutory requirements governing the actions of school boards in New Jersey.

These actions suggest an arbitrary, possibly retaliatory, decision rather than one grounded in lawful, policy-compliant governance. The community deserves accountability, and Dr. Chanley is entitled to fair treatment under the law.

We demand the following:

- An immediate investigation by state oversight authorities into the legality of the Board's actions.
- The prompt reinstatement of Dr. Chanley pending a lawful, transparent, and fair process.
- Full public disclosure of the rationale, evidence, and legal basis behind the Board's decision.

Additionally, we urge a formal inquiry into the broader conduct of the Board. There is a concerning pattern of capricious and potentially unlawful behavior: I was personally targeted in April and May of 2024 when Board members openly named me during votes at two separate public meetings. An ethics complaint regarding this was filed on my behalf. This same inappropriate, unlawful, arbitrary and capricious conduct occurred again on March 17, 2025, regarding Principal Garcia and Dr. Cetta, and again—most recently— with Dr. Chanley on May 6, 2025.

These repeated breaches of legal and ethical norms cannot continue unchecked. The integrity of our school governance—and the trust of our community—depend on accountability, legality, and the fair treatment of all public servants.

By signing below I acknowledge that I have received a copy of the Pro Se Petition of Appeal, which was emailed to me on Monday, May 12, 2025.

Name:

Adam S. Weiss, Esquire

Board Attorney

The Busch Law Group

Date: _____

Signature: _____

Pro Se Petition of Appeal



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Date: 05/15/2025

Section I. Parties' Information

Petitioner's information

Name: Roshni Shah

Address: [REDACTED]

Daytime phone/cell phone: [REDACTED]

Email address: [REDACTED]

Respondent's information:

Name: Monroe Township Board of Education

Address: 423 Buckelew Ave Monroe Township, NJ 08831

Phone number: 732-521-1500

Email address (optional):

Section II. Statement of Specific Allegations and Essential Supporting Facts

Petitioner hereby requests the Commissioner of Education to consider a controversy which has arisen between petitioner and respondent pursuant to the authority of the Commissioner to hear and determine controversies under the school law (N.J.S.A. 18A:6-9), by reason of the following facts:

(In this section, please set forth in as many itemized paragraphs as are necessary to identify the specific allegation(s), and the supporting facts, which constitute the basis for the dispute. Please attach additional sheets as necessary.)

Please see attached document.

Section III. Relief Requested

Wherefore, petitioner requests the following relief:

(In this section, please set forth the relief desired. Please attach additional sheets as necessary.)

Immediate Reinstatement of Dr. Chari Chanley

Petitioner Signature:

Roshni Shah

Date: 05/15/2025

Section IV. Statement of Verification

Roshni Shah, of full age, being duly sworn upon his or her oath according to law deposes and says
name of petitioner

- I am the petitioner in the foregoing matter.
- I have read the petition and aver that the facts contained therein are true to the best of my knowledge and belief.

Petitioner signature: Roshni Shah Date: 5/15/25

Section V. Proof of Service

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Section VI. If Seeking Relief on an Emergent Basis

If relief is sought on an emergency basis, the petitioner must additionally file a motion accompanied by a memorandum addressing the standard for granting such relief pursuant to Crowe v. DeGioia, 90 N.J. 126 (1982); see N.J.A.C. 6A:3-

1.6. This means the petitioner must demonstrate that:

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- The legal right underlying petitioner's claim is settled;
- The petitioner has a likelihood of prevailing on the merits of the underlying claim; and
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Trenton, New Jersey 08625.

Statement of allegations regarding the improper administrative leave of Superintendent Dr. Chari Chanley:

During the board meeting on Monday, May 5th, the Monroe Township Board of Education allegedly acted improperly and illegally by placing Dr. Chari Chanley on paid administrative leave. This decision was made after the board returned from a closed session in which the superintendent's performance was discussed. A motion was then introduced to place Dr. Chanley on administrative leave "because of what we heard tonight." Notably, two board members who were present during the closed session expressed surprise at the motion, indicating that the decision to place the superintendent on leave was not discussed during the session.

The Board failed to hold a public hearing or provide Dr. Chanley with an opportunity to respond to any formal allegations, as required by due process protections. The absence of a public hearing and the lack of transparency in both process and reasoning constitute clear violations of the superintendent's legal rights and contradict the procedural requirements outlined in New Jersey statutes governing school district governance.

This sequence of events appears to represent an arbitrary and potentially retaliatory action, rather than a lawful, policy-compliant decision by the Board. The community deserves accountability, and Dr. Chanley is entitled to due process under the law.

Furthermore, the motion itself was procedurally flawed. The Board operates under Robert's Rules of Order, and at the time the motion was made by Gail DiPane, she did not have the floor. Additionally, the motion was not on the meeting agenda, as required. Such a motion should have been introduced under the "Other Board Business" section of the meeting. If the administrative leave of the superintendent were to be discussed in closed session, it would have legally needed to be on the agenda to inform the public. Although the Board may occasionally take action following a closed session discussion, this was not the case here. There was no prior discussion regarding placing the superintendent on administrative leave.

In conclusion, Dr. Chanley should be reinstated immediately, as the vote and process used to place her on administrative leave were not conducted in accordance with the law. Dr. Chanley is entitled to due process as outlined in New Jersey statutes governing school districts. The Board of Education's failure to adhere to legal procedures has exposed the district to significant risk of litigation.

We call for an immediate review of this action by the appropriate state authorities, the reinstatement of Dr. Chanley pending a lawful and fair process, and full public disclosure of the facts and legal basis surrounding the Board's decision.

Pro Se Petition of Appeal

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Date: May 8, 2025

Section I. Parties' Information

Petitioner's information

Name: Christine Skurbe

Address: [REDACTED]

Daytime phone/cell phone: [REDACTED]

Email address: [REDACTED]

Respondent's information:

Name: Monroe Township Board of Education

Address: 423 Buckelew Avenue

Phone number: 732-521-1500

Email address (optional):

Section II. Statement of Specific Allegations and Essential Supporting Facts

Petitioner hereby requests the Commissioner of Education to consider a controversy which has arisen between petitioner and respondent pursuant to the authority of the Commissioner to hear and determine controversies under the school law (N.J.S.A. 18A:6-9), by reason of the following facts:

(In this section, please set forth in as many itemized paragraphs as are necessary to identify the specific allegation(s), and the supporting facts, which constitute the basis for the dispute. Please attach additional sheets as necessary.)

See attached statement of allegations

Section III. Relief Requested

Wherefore, petitioner requests the following relief:

(In this section, please set forth the relief desired. Please attach additional sheets as necessary.)

It is requested that Superintendent Chari R. Chanley be allowed to return to work immediately as the Superintendent of Schools as the vote to put her out on administrative leave was not legally carried out.

Petitioner Signature: Christine Skurbe

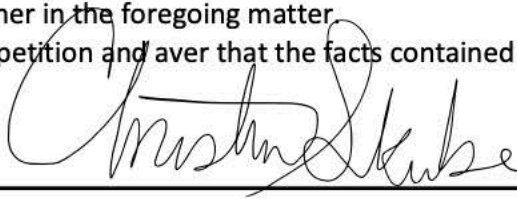
Date: May 8, 2025

Section IV. Statement of Verification

Christine Skurbe, of full age, being duly sworn upon his or her oath according to law deposes and says
name of petitioner

- I am the petitioner in the foregoing matter.
- I have read the petition and aver that the facts contained therein are true to the best of my knowledge and belief.

Petitioner signature: _____



Date: May 8, 2025

Section V. Proof of Service

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New Jersey State Department of Education
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Trenton, New Jersey 08625.

Statement of allegations regarding the improper administrative leave of Superintendent Chari R. Chanley.

On Monday, May 5, 2025 a Board of Education meeting was held at the Monroe Township High School. The meeting was very long as there was much controversy over the Superintendent's recommendation to reapprove Dr. Orselina Cetta as the Woodland School Principal. 5 Board members had abstained at the March 2025 meeting and Dr. Cetta was not approved as she did not receive the 5 votes needed for approval. Dr. Chari Chanley, Superintendent of Schools put her recommendation to approve Dr. Cetta back on the agenda for May 5, 2025. During the public comment section of the meeting, parents, students, teachers and administrators gave testimony on why Dr. Cetta should be approved by the Board. It was about 2 hours of public comment. There was not 1 negative comment made regarding Dr. Cetta. Board members made statements that they usually don't do it but they were changing their mind and voting to approve Dr. Cetta. It was obvious that some Board members were not happy this item was back on the agenda. The Board went into closed session after this as the last item on the agenda. The only item listed to be discussed on the agenda in closed session was the Superintendent's Evaluation. Upon returning from Closed Session, the President of the Board, Katie Fabiano announced that there would be no public comment section for closed session items because no one was present in the audience. Katie Fabiano was about to adjourn the meeting when Board member Gail DiPane called out and said she wanted to make a motion to put the superintendent on administrative leave "based on what we heard here tonight". What they heard was praise for Dr. Cetta and extreme thanks to Dr. Chanley for putting her back on the agenda. Board member Gazala Bohra and Peter Tufano were visibly upset about this and tried speaking up but Katie Fabiano went right to a vote. The motion passed with Katie Fabiano and Peter Piro both voting.

It has been widely known since 2022 that Katie Fabiano was conflicted on all matters dealing with Chari Chanley because of the various litigation her husband was involved in that attempted to fire Dr. Chanley. Katie Fabiano never voted on any matter involving Dr. Chanley since being on the Board of Education. Monday, May 5, 2025 was the first vote Katie Fabiano took on Dr. Chanley and it was to put her on administrative leave. As the former Monroe Board of Education President in 2022-2024, I know the procedure and process to put an employee on administrative leave. There is discussion with the Board and there is legal consultation that takes place. It is not a random motion made at a meeting without any discussion of the full board. It was posted on social media by both Gazala Bohra and Peter Tufano that there was no discussion in closed session to put Dr. Chanley on administrative leave. While they did not disclose what the conversation in closed session was, they said this was not discussed. There is a case

currently pending that I filed against Katie Fabiano last year regarding her reversing an already approved medical leave of absence for Dr. Chanley. I had approved it in April 2024 before leaving office and Katie reversed the terms of the leave as Dr. Chanley was already on the medical leave. It was clear that Katie Fabiano was using her role as the President to go after Dr. Chanley last year and she did again this past Monday, May 5, 2025 when she took a vote to put Dr. Chanley on admin leave. Due to the pending case against her, she should have abstained.

Additionally, Peter Piro is a Board member that is widely seen as a conflicted Board member. He was a former employee and resigned under Dr. Chanley. He ran his campaign for Board of Education citing that he wanted to get rid of Dr. Chanley. Recently, he authored a letter to a resident in which he broke confidentiality, spoke about personnel matter regarding Dr. Cetta and publicly evaluated Dr. Chanley. All of this is a clear violation of the law and several ethics codes. Peter Piro also should not have voted on the illegal motion made by Gail DiPane to put Dr. Chanley on administrative leave.

Finally, the motion itself was illegal in the fact that the Board operates under Robert's Rules of Order. At the time Gail DiPane made the motion, she did not have the floor nor was it in the agenda that such actions could be taken. This motion should have come under the Other Board Business section of the meeting. If the administrative leave of the superintendent was to be discussed in closed session, it would have legally needed to be on the agenda so that the public was aware of it. As I stated earlier, Board members have confirmed there was no such conversation in closed session. So when Gail DiPane made her motion, it was not an item that was from closed session therefore it was not the proper time for it. There are times when the Board has a discussion in closed session and it results in action being taken. However this is not the case. The Board did not discuss putting the superintendent on administrative leave in closed session.

In conclusion, Dr. Chanley should be allowed to return to work as the vote and process used to put her on administrative leave was not legally carried out. Dr. Chanley is entitled to due process as outlined in NJ statutes governing school districts. The Board of Education failed to do so and as a result has put the district at great risk for litigation against it.