

Simons, Jennifer

From: Pradeep Melam [REDACTED]
Sent: Friday, May 9, 2025 12:11 PM
To: Laura Allen; ControversiesDisputesFilings; aweiss@buschlawgroup.com
Cc: Katie.Fabiano@monroe.k12.nj.us; carmen.alvarez@monroe.k12.nj.us; Gazala Bohra; gail.dipane@monroe.k12.nj.us; peter.piro@monroe.k12.nj.us; usha.sharma@monroe.k12.nj.us; Kate.Rattner@monroe.k12.nj.us; peter.tufano@monroe.k12.nj.us; charles.zeichner@monroe.k12.nj.us; amanda.peck@monroe.k12.nj.us
Subject: [EXTERNAL] Fwd: Pro Se Petition of Appeal - Improper administrations leave of Superintendent Chari R Chanley
Attachments: Pro Se Petition of Appeal.pdf

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This message came from an **EXTERNAL** address [REDACTED] **DO NOT** click on links or attachments unless you know the sender and the content is safe.

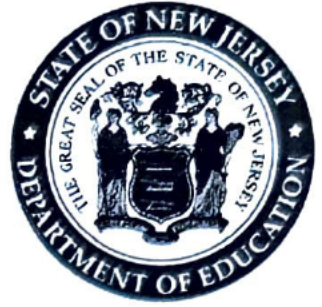
New Jersey State Government Employees Should Forward Messages That May Be Cyber Security Risks To
PhishReport@cyber.nj.gov.

Attn Commissioner Dehmer,
Please find the Pro Se Petition of Appeal regarding Improper administration leave of Superintendent Chari R Chanley of Monroe Twp, Middlesex County, NJ
I wish for a speedy action from your side.

Pradeep Melam
[REDACTED]

Pro Se Petition of Appeal

Please note: This petition of appeal template is made available for convenience purposes only; this form does not have to be used in order to initiate a contested case before the Commissioner of Education. All information on this form, with the exception of fields marked "optional," is required in order to initiate a contested case. Failure to complete any area may delay the opening of your petition.



Date: 05/09/2025

Section I. Parties' Information

Petitioner's information

Name: Pradeep Melam

Address: [REDACTED] Monroe Twp, NJ 08831

Daytime phone/cell phone [REDACTED]

Email address: [REDACTED]

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

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 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.