

Simons, Jennifer

From: Cristina Zawacki [REDACTED]
Sent: Wednesday, May 14, 2025 4:00 PM
To: ControversiesDisputesFilings
Cc: Laurie Pagano; Rita Barone; Laura.allen@monroe.k12.nj.us; aweiss@buschlawgroup.com; Dina Senteneri; Katie.Fabiano@monroe.k12.nj.us; peter.tufano@monroe.k12.nj.us; Kate Rattner; Gazala Bohra; carmen.alvarez@monroe.k12.nj.us; charles.zeichner@monroe.k12.nj.us; peter.piro@monroe.k12.nj.us; gail.dipane@monroe.k12.nj.us; usha.sharma@monroe.k12.nj.us; amanda.peck@monroe.k12.nj.us; Anderson, Kyle
Subject: [EXTERNAL] Re: Zawacki, Cristina vs Monroe Township Board of Education; Claim No. 25EO00168AB
Attachments: FINAL Pro_se_form .pdf

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Good afternoon, all.

Apologies for the confusion, and thank you for the clarification.

Based on the language within the form, I was operating with the understanding that I needed to send the petition to the board attorney, Mr. Weiss, prior to sending it to all of you.

Attached please find a Pro Se Petition calling for the immediate reinstatement of the Monroe Township Superintendent Dr. Chari Chanley.

The last page on the form requests a signature of receipt from Mr. Weiss, which I have now learned was not needed.

Thank you in advance for your time and attention to this matter.

On Wed, May 14, 2025 at 2:34 PM ControversiesDisputesFilings
<ControversiesDisputesFilings@doe.nj.gov> wrote:

Ms. Barone,

We do not have any record of a petition from Ms. Zawacki.

Jennifer Simons

she/her/hers

Director

Office of Controversies & Disputes

New Jersey Department of Education

100 Riverview Plaza | Trenton, NJ - 08625

Work: 609-376-9079

Email: ControversiesDisputes@doe.nj.gov

Web: <https://www.nj.gov/education/>



From: Laurie Pagano <LPagano@fbolawfirm.com>

Sent: Wednesday, May 14, 2025 2:30 PM

To: ControversiesDisputesFilings <ControversiesDisputesFilings@doe.nj.gov>

Cc: [REDACTED] <Laura.allen@monroe.k12.nj.us> 'Laura.allen@monroe.k12.nj.us'
<Laura.allen@monroe.k12.nj.us>; aweiss@buschlawgroup.com; 'Dina Senteneri'
<DSenteneri@njsig.org>

Subject: [EXTERNAL] Zawacki, Cristina vs Monroe Township Board of Education; Claim No. 25EO00168AB

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Please see the attached.

Kind regards,

Laurie Pagano, Legal Assistant

FLANAGAN BARONE O'BRIEN

4 Essex Avenue, Suite 200

P.O. Box 259

Bernardsville, NJ 07924

Direct Phone: (908) 306-6730

Fax: (908) 658-4659

Email: lpagano@fbolawfirm.com



FLANAGAN BARONE O'BRIEN

PLEASE NOTE: We are pleased to announce that the name of our firm has been changed to **FLANAGAN, BARONE & O'BRIEN**. Our new website address is fbolawfirm.com. We ask that you kindly update your records to reflect our new name and email addresses. Emails sent to our old email address will be forwarded. Thank you.

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Best,
Cristina Zawacki



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: 5/12/2025

Section I. Parties' Information

Petitioner's information

Name: Cristina Bolusi Zawacki

Address: [REDACTED] Monroe Township, NJ 08831

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: _____

A handwritten signature in black ink, appearing to read "Cristina Bolusi Zawacki", is written over a horizontal line.

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

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 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: _____