

Simons, Jennifer

From: Roshni Shah [REDACTED]
Sent: Thursday, May 15, 2025 9:13 PM
To: ControversiesDisputesFilings
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Subject: [EXTERNAL] Action Required: Pro Se Petition of Appeal
Attachments: Pro Se Form_051525.docx; Pro Se Form with Signature_051525.pdf

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Dear Commissioner of Education –

Please find the attached Pro Se Petition of Appeal which requires your immediate attention in Monroe Township, NJ.

By way of copy on this email, the Board of Education attorney, Board of Education Secretary, and Board of Education members are served with this appeal.

Please feel free to reach out to me if you require further information.

Sincerely,

Roshni Shah

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: 05/15/2025

Section I. Parties' Information

Petitioner's information

Name: Roshni Shah

Address: [REDACTED] Monroe, NJ 08831

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

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 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.