

T.T., ON BEHALF OF MINOR CHILD, G.C., :  
 PETITIONER, :  
 V. : COMMISSIONER OF EDUCATION  
 BOARD OF EDUCATION OF THE : DECISION  
 TOMS RIVER REGIONAL SCHOOL DISTRICT,  
 OCEAN COUNTY, :  
 RESPONDENT. :

SYNOPSIS

*Pro se* petitioner challenged the determination of the respondent Board that G.C. was not the victim of harassment, intimidation or bullying (HIB) under the provisions of the New Jersey Anti-Bullying Bill of Rights Act, N.J.S.A. 18A:37-13 to -32.1 (the Act). T.T., the mother of G.C. – a seventh grade student in respondent’s school district – alleged that her daughter had been the victim of treatment by staff members employed by the Board that constituted HIB within the meaning of the statute. In a separate petition, T.T. contended that the Board had violated regulations pertaining to G.C.’s student record. The two matters were consolidated and heard together on April 29, 2016.

The ALJ found, *inter alia*, that: the Act applies to any gesture, or any written, verbal or physical act, or any electronic communication that is reasonably perceived as being motivated either by an actual or perceived characteristic, such as, *inter alia*: race, color, religion, national origin, gender, sexual orientation, or any other distinguishing characteristic; in this case, the allegations of HIB involved three separate incidents wherein G.C. purportedly was the victim of HIB at the hands of various teaching staff members, and a substitute teacher; all alleged HIB incidents were investigated by the principal of the Intermediate School, who was trained as the building’s HIB specialist; based on the testimony at the hearing and the record of this matter, none of the three alleged instances of HIB met the definition as spelled out in the Act; none of the actions taken appear to have been motivated by any actual or perceived characteristic as outlined in the statute; to the extent that the petitioner alleges that her advocacy on behalf of G.C. is the qualifying distinguishing characteristic, the record is devoid of evidence that such advocacy motivated any of the actions in the three incidents at issue here; with regard to the student records issue, there was an information breach involving a school administrator’s child which resulted in several of G.C.’s fellow students being privy to G.C.’s schedule before she received it in the mail; the Board, however, acknowledged this breach, took steps to ensure that it does not happen again, and accommodated petitioner’s request for relief by making a change to G.C.’s schedule. The ALJ concluded that petitioner did not meet her burden of proof to show that the Board’s HIB determination was arbitrary, capricious or unreasonable; further, the records matter is now moot as petitioner received the relief that was sought. Accordingly, the ALJ recommended dismissal of the petition.

Upon review, the Commissioner concurred with the ALJ’s findings and conclusions, and adopted the Initial Decision as the final decision in this matter. The petition was dismissed.

This synopsis is not part of the Commissioner’s decision. It has been prepared for the convenience of the reader. It has been neither reviewed nor approved by the Commissioner.

OAL DKT. NOS. EDU 12994-15 AND EDU 13587-15 (CONSOLIDATED)  
AGENCY DKT. NOS. 226-8/15 AND 187-7/15

T.T., ON BEHALF OF MINOR CHILD, G.C., :  
PETITIONER, :  
V. : COMMISSIONER OF EDUCATION  
BOARD OF EDUCATION OF THE : DECISION  
TOMS RIVER REGIONAL SCHOOL DISTRICT,  
OCEAN COUNTY, :  
RESPONDENT. :

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The record of this matter and the Initial Decision of the Office of Administrative Law (OAL) have been reviewed, as have the exceptions filed by the petitioner. The Board’s reply exceptions were untimely filed pursuant to *N.J.A.C. 1:1-18.4(d)*, and will therefore not be considered by the Commissioner.<sup>1</sup>

In her exceptions, petitioner argues that the alleged actions constitute Harassment, Intimidation and Bullying (HIB) because G.C. was being retaliated against for filing HIB allegations, and G.C. was being targeted because she has a mother who advocates for her. Procedurally, petitioner contends that the Board did not properly investigate the HIB complaints and failed to file the HIB report within the proper time limit.<sup>2</sup>

Upon a comprehensive review of the record, the Commissioner agrees with the Administrative Law Judge (ALJ) that the Board did not act in an arbitrary, capricious, or

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<sup>1</sup> The Commissioner was not provided with a transcript of the April 29, 2016 hearing at the OAL.

<sup>2</sup> Petitioner’s exceptions appear to reference a September 22, 2017 incident, which occurred after the record in this matter was closed and well after the 2015 petitions were filed. Additionally, attached to petitioner’s exceptions is a series of documents, including an exhibit marked “P-8”, which does not appear to have been presented at the hearing in this matter. Any new allegations or additional documents that were not entered into evidence before the Administrative Law Judge will not be considered by the Commissioner.

unreasonable manner in rendering its HIB determination. There is no evidence in the record that the alleged actions were motivated by a distinguishing characteristic of G.C. Although petitioner appears to allege that G.C.'s distinguishing characteristic is that she has a mother who advocates for her, there is no indication of this in the record; further, petitioner's exceptions do not demonstrate that – even if the advocacy of G.C.'s mother was a distinguishing characteristic – the alleged actions were *motivated* by said characteristic, as required by *N.J.S.A. 18A:37-14*.

The Commissioner further concurs with the ALJ's conclusion that – although unauthorized individuals gained access to G.C.'s schedule – *N.J.A.C. 6A:32-7.7* provides for requests to stay the disclosure of records pending final determination of the challenged procedure. Here, the Board has already addressed the unauthorized disclosure of student records, so there is no disclosure for which petitioner can request a stay. Finally, the Commissioner is in agreement with the ALJ's determination that the issues involving G.C.'s schedule were previously addressed by providing petitioner with the relief she sought, so that aspect of this matter is now moot.

Accordingly, the Initial Decision of the OAL is adopted as the final decision in this matter for the reasons expressed therein, and the petition is hereby dismissed.

IT IS SO ORDERED.<sup>3</sup>

COMMISSIONER OF EDUCATION

Date of Decision: November 17, 2017

Date of Mailing: November 20, 2017

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<sup>3</sup> This decision may be appealed to the Superior Court, Appellate Division, pursuant to *P.L. 2008, c. 36 (N.J.S.A. 18A:6-9.1)*.



**State of New Jersey**  
OFFICE OF ADMINISTRATIVE LAW

**INITIAL DECISION**

OAL DKT. NOS. EDU 12994-15 AND  
EDU 13587-15 (Consolidated)  
AGENCY DKT. NOS. 226-8/15 AND  
187-7/15

**T.T., ON BEHALF OF MINOR CHILD, G.C.,**

Petitioner,

v.

**BOARD OF EDUCATION**

**OF THE TOMS RIVER REGIONAL**

**SCHOOL DISTRICT, OCEAN COUNTY,**

Respondent.

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**T.T.**, on behalf of minor child, **G.C.**, petitioner, pro se

**Valter H. Must**, Esq., for respondent (Carluccio, Leone, Dimon, Doyle & Sacks,  
L.L.C., attorneys)

Record Closed: August 22, 2016

Decided: October 5, 2017

BEFORE **ELIA A. PELIOS**, ALJ:

## **STATEMENT OF THE CASE**

Petitioners, T.T., on behalf of minor child, G.C., residents of Toms River, New Jersey, and the mother of a seventh-grade girl, and father P.C., contend that their daughter was the victim of behavior statutorily defined as harassment, intimidation and bullying (HIB) and of violation of student records regulations, by respondent Board of Education of the Toms River Regional School District, Ocean County (Board).

## **PROCEDURAL HISTORY**

Petitioner filed a petition with the Commissioner of Education (the Commissioner) on August 17, 2015, and July 15, 2015. Answers were filed and the matters transmitted to the Office of Administrative Law (OAL) on September 1, 2015, and September 4, 2015. As the matter involving the challenge to G.C.'s schedule was transmitted with a request for emergent relief, it is noted that the emergent relief was settled upon the respondent's accommodating petitioner's schedule change request. An order of consolidation was entered on December 3, 2015. The matters were heard together on April 29, 2016, and the record was held open to allow for the filing of documents post-hearing by the parties. A conference call was held to advise the parties that additional facts and allegations of new incidents submitted after the hearing would not be considered and the record closed on August 22, 2016. Orders were entered in this matter to allow for the extension of time in which to file the initial decision. The parties agree that the incident of February 25, 2015 as described in the petition, is not under review in these proceedings due to the ninety- day rule.

## **STATEMENT OF FACTS**

Although these proceedings consist of two separate petitions which have been consolidated, for clarity of record the testimony and evidence was presented for each matter separately. In the HIB matter, the Board called Bryan Madigan (Madigan), who is employed

by the Toms River Board of Education as a principal at the Intermediate East building. He has been so employed for seventeen years, and prepared the HIB investigations (R-1, R-2 and R-3). He has received training in harassment, intimidation, and bullying (HIB). Reviewing the first investigation report (R-1), Madigan noted that there was a report that the director of the school play made comments about G.C.'s gum-chewing, and that there was a full HIB investigation after. He interviewed G.C., the student-petitioner in this matter, and reviewed a written statement and interview with the director regarding their comments about G.C.'s mother allowing G.C. to chew gum. Three other students were also interviewed by Madigan. The scene in the play called for gum-chewing, and upon learning that two of the students had braces, the director decided to not have them actually chew gum. G.C. alleged that the director expressed surprise when G.C., who wears braces, stated that her mother allows her to chew gum, asking "Is everyone getting this on tape? G's mom is going to allow her to chew gum." It was determined that there was no HIB from this matter, and the Board agreed.

Madigan then reviewed the investigation of the second alleged bullying incident (R-2), and stated that the G.C. felt that she was picked-on by the teacher, which made it hard to attend class. The teacher did not like the answer that the student gave on a quiz, and upon receiving G.C.'s explanation citing support she found in a book said, "well I guess I can accept that." G.C. stated there was no follow up and she never received the quiz back. It was noted that the teacher does not always return homework. Other students were interviewed in the matter, and their statements were consistent with the teacher's. The teacher explained that the "quiz" was a mini assessment designed to determine if the students were reading. She stated that she accepted the answer as given. Madigan determined that there was no HIB, and the Board agreed with him.

Madigan then reviewed the third HIB incident (R-3). G.C. was sent to the office by a substitute teacher, and she saw the principal. She stated that the substitute teacher was treating her unfairly, and embarrassing her in front of her peers. Madigan did not speak to G.C., stating that T.T. would not allow him to do so. Other students said that the class was noisy, one child moved to the back of the room, and another child was disciplined. The

substitute addressed G.C. for turning-around and acting-out. The substitute called G.C. up to the front of the room and said, "it must be hard for you to listen to someone else because you do what you want." Madigan determined that this was not an instance of HIB, the matter was appealed to the Board, and the Board agreed.

On cross examination, Madigan was asked why only three students were interviewed in the first incident, when fifty people were present. He stated that the characters the Boylan sisters were involved and so they would be directly in the presence of the incident and heard most closely what had occurred. He reiterated that other students had braces. He was then asked who he interviewed with regard to the second incident. Madigan interviewed J.R. who was the same student interviewed in the prior HIB incident, and three others, and he was asked why only those three when there were thirty students in the class. Madigan stated that he was attempting to determine if students are being treated fairly in class. It was noted that J.R.'s parents both work for the Board of Education, and the question was asked why this student should keep being interviewed. Madigan noted that she was directly involved in the gum incident, as for other incidents, it was believed that J.R. was friends with petitioner G.C.

With regard to the third incident, Madigan noted that he was aware that the regular teacher apologized for the incident. When asked if he knew that Mr. Clark asked G.C. to write an apology, and that she was in hives and nervous, Madigan stated that he was of the understanding that G.C. was okay with the apology. When asked why the substitute teacher involved keeps being assigned to classes where petitioner G.C. is assigned, he stated that he has no reason not to, as the substitute was found not guilty of HIB. He stated that nothing happened again that year, and that the administration made sure of it. Madigan notes that this year, the current year, there was a new system in place first for substitutes and third-party employers where a substitute can pick their assignment. He is not always sure what class a substitute is going to be assigned to, and noted that G.C. has been offered the opportunity to come speak to the administration or guidance counselors, but his understanding is that T.T. instructed G.C. not to speak to anybody but her.

Madigan believes there is no evidence that the play director in the first incident has any problem with G.C. It is noted that with regard to the third incident, G.C. was not the only student required to apologize, as another student also had to write an apology to the regular teacher, stating that he was sorry.

T.T. the mother of G.C. testified on behalf of the petitioner. She believes that the Board did not follow its own procedures, stating that she believes the attorney found that HIB was not established before the Board even voted. She stated that she believes that G.C. feels that she is retaliated against because she, T.T., and G.C.'s father P.C., advocate on her behalf. T.T. alleges that the plum parts in the school plays are given to children of administrators and teacher of the year recipients.

With regard to the first incident, T.T. told the Board about the incident, and they conducted an HIB investigation. Only three of fifty students present were interviewed, and a parent of one of the three interviewed children is affiliated with the school.

With regard to the second incident, T.T. alleges that the grades policy is not fair. She believes that one teacher, Brienne Bates, would give points to some students, but not her daughter, and made her move back a row in the school play.

With regard to the third incident, she believes that asking her daughter to write an apology is unacceptable, and believes it was inappropriate that she was not allowed to confront the substitute in front of her daughter to determine what happened. She underscored that the regular teacher apologized to G.C. for the incident. She described being worried about her daughter, and that she cries every day. She stated that her daughter is a straight A+ student who loves school, but does not want to go because she does not feel safe there. T.T. stated that a cease-and-desist letter that is in place limits how she is able to communicate with the school, and that she cannot talk to the anti-bullying specialist directly.



On cross-examination, T.T. identified the cease-and-desist order (R-4) which directs her to address her concerns directly to Madigan. The school offered counseling to G.C., but G.C. refused the counseling due to the guidance counselor's reaction to the HIB investigation. G.C. feels singled-out, and retaliated against, due to her parents' advocacy on her behalf.

With regard to the issue involving the disclosure of student records, T.T. testified on her own behalf. She stated that an administrator's child sent a text to G.C., and to other students, about G.C.'s schedule before G.C. ever received her schedule in the mail. T.T. complained to the administration, which angered the assistant superintendent. Prior to the school year starting, an email was sent to T.T. The email did not mention that Madigan's daughter had access to his password. This occurred before the 2014 school year, and happened again prior to the 2015 school year and was a manipulation of the school schedule. It was noted that J.R.'s father is the principal of the high school. J.R. texted that she did not want G.C. in the same class, and had access through her father's ID to change the class assignments (P-5 and P-6).

The assistant superintendent said he would take care of the matter with Madigan. He told T.T. that it was a secretary employed by the school district who allowed the students to access school records. It was noted that the two principals' daughters bragged about having access and power to records and schedules.

T.T. stated that when she hears these issues she gets worried and complains. Her daughter G.C. feels targeted by other students because T.T. complains. T.T. wants to know since these issues were known for the prior year, how it was able to happen again.

On cross-examination, T.T. stated that she does not know who specifically sent the text, but that it was not J.R. She was asked for texts of the second incident. T.T. asked for G.C. to be placed in a particular class, and that request was accommodated, but was noted that the bully in this matter lives next door. She stated that the kids were pretending to want a particular teacher, and that a particular class was the place to be, but that was not true,

they were trying to be in a different class. She asked that G.C. be assigned to the class that the students were talking about, and as a result G.C. was not in the class with the students she wanted.

Madigan once again took the stand. He stated the allegation was brought to his attention about his daughter, and he investigated the matter. He stated that his daughter and another student were helping another teacher, when people started getting texts that students were getting their schedules in the mail at home. His daughter and her friend N.P. went to his secretary to ask if they could learn their homeroom and assignment, and then asked about their friends. He acknowledged that his secretary told him about the incident. Madigan believes that N.P. then texted G.C. with the information. He stated that the students should not have asked, his secretary received a written reprimand, and that his daughter is happy that G.C. was in her class.

This year, Madigan stated that G.C.'s parents made a request to the guidance department that she see her homeroom assignment, and the administration honored that request. He had no idea that J.R. was accessing the schedule, or that J.R. requested a different cycle from G.C.

On cross-examination, Madigan stated he did not believe that he was biased investigating his own daughter. He stated that his daughter and G.C. could be in the same cycle, but not homeroom and N.P. is happy in the same cycle. He noted that his daughter and N.P. play basketball, and that his daughter and any students for that matter, are now not allowed behind the secretary's desk. He agrees that the circumstances give the perception of preferential treatment. To his knowledge, this no longer occurs. Madigan's directive and direction is that no students are allowed behind the secretary's desk. He asked why his daughter was allowed to not wear her school ID, but that G.C. gets in trouble for not wearing hers, he responded that his daughter was reprimanded.

Madigan acknowledged that his other daughter from another school was given a part in the school play before other students were offered. He stated that it was the

director's idea was to have small children in the play, and that the director suggested his children, and that he said that it was okay. He believes that his daughters are held to higher standards than other children. Madigan stated that there are 1,500 children in the school, and they address it when they know that rules are broken.

Considering the testimonial and documentary evidence in the matter, I **FIND** that Mr. Madigan investigated three instances of alleged HIB against G.C. In one instance, a play director sarcastically asked those assembled if people were recording G.C. stating that her mother would let her chew gum with braces. In the second, a teacher skeptically quipped that she guessed she could accept G.C.'s answer in a mini quiz when presented by G.C. with support found in a book for the given answer, and in the third, a substitute sent G.C. to the office for talking in class and made a comment about G.C. doing whatever she wants. G.C. was made to write an apology. In all three instances Madigan determined that no HIB occurred and the board agreed with him.

I further **FIND** that in advance of the 2015-2016 school year, students gained access to the records system and were able to ascertain G.C.'s schedule and informed G.C. of that fact before she had been notified of her schedule. When G.C. was concerned she would not be in class with people she wanted to be with, T.T. requested a change which was accommodated.

### **CONCLUSIONS OF LAW**

Toms River Regional School District's HIB policy was adopted in the aftermath of the enactment of comprehensive amendments to the New Jersey Anti-Bullying Law. N.J.S.A. 18A:37-14. The 2010 amendments, which were approved on January 5, 2011, and took effect with the 2011-2012 school year, strengthened the definition of HIB to include:

[A]ny gesture, any written, verbal or physical act . . . whether it be a single incident or a series of incidents, that is reasonably perceived as being motivated either by any

actual or perceived characteristic such as race, color, religion, ancestry, national origin, gender, sexual orientation, gender identity and expression, or a mental, physical or sensory disability, or by any other distinguishing characteristic, that takes place on school property, at any school-sponsored function, on a school bus, or off school grounds . . . that substantially disrupts or interferes with the orderly operation of the school or the rights of other students and that:

- a. a reasonable person should know, under the circumstances, will have the effect of physically or emotionally harming a student or damaging a student's property, or placing a student in reasonable fear of physical or emotional harm to his person or damage to his property;
- b. has the effect of insulting or demeaning any student or group of students; or
- c. creates a hostile educational environment for the student by interfering with a student's education or be severely or pervasively causing physical or emotional harm to the student.

[N.J.S.A. 18A:37-14.]

In the present matter, only two witnesses offered testimony: the administrator conducting the investigations and the mother of the alleged victim. No testimony was offered by anyone with first hand knowledge or observation of the incidents in question. However, even taking the written statements offered by G.C. at face value and assuming arguendo that the events in question occurred as described therein, it appears that none of the three alleged instances of HIB meet the definition of HIB as spelled out in the statute and I so CONCLUDE. None of the actions taken appear to be motivated by any actual or perceived characteristic as outlined in that statute. To the extent that the petitioners allege that their advocacy on behalf of G.C. is the qualifying distinguishing characteristic, the record is devoid of evidence that such advocacy motivated the actions in any of those instances. It is noted that in the third incident, the conduct was performed by a substitute teacher, who is presumably less a part of daily interaction

between students and parents and it is difficult to ascribe such motivation absent a modicum of evidence that is simply not present in the record.

It is further noted that the Commissioner will not overturn the decision of a local board in the absence of a finding that the action below was arbitrary, capricious or unreasonable. T.B.M. v. Moorestown Bd. of Educ., EDU 2780-07, Initial Decision (February 6, 2008), <<http://njlaw.rutgers.edu/collections/oal/>> (citing Thomas v. Morris Twp. Bd. of Educ., 89 N.J. Super. 327, 332 (App. Div. 1965), aff'd, 46 N.J. 581(1966)). The Commissioner will not substitute his judgment for that of the board of education, whose exercise of its discretion may not be disturbed unless shown to be “patently arbitrary, without rational basis or induced by improper motives.” Kopera v. W. Orange Bd. of Educ., 60 N.J. Super. 288, 294 (App. Div. 1960). Our courts have held that “[w]here there is room for two opinions, action is not arbitrary or capricious when exercised honestly and upon due consideration, even though it may be believed that an erroneous conclusion has been reached.” Bayshore Sewage Co. v. Dep’t of Env’tl. Prot., 122 N.J. Super. 184, 199–200 (Ch. Div. 1973), aff'd, 131 N.J. Super. 37 (App. Div. 1974). Thus, in order to prevail, the petitioner must demonstrate that the Board acted in bad faith, or in utter disregard of the circumstances before it. T.B.M., supra, EDU 2780-07. It is a weighty burden; one which I **CONCLUDE** this petitioner has not met. Accordingly, I further **CONCLUDE** that petitioner’s action challenging the Board’s determination that HIB did not occur in the herein described incidents must be **DISMISSED**.

With regard to the student record issue, N.J.S.A. 18A:36-19 provides that the “State Board of Education shall provide by regulation for the creation, maintenance and retention of pupil records and for the security thereof and access thereto, to provide general protection for . . . the right of both pupil and parent or guardian to reasonable privacy as against other persons.” To that end, N.J.A.C. 6A:32-7.5 (a) provides that “[o]nly authorized organizations, agencies or persons as defined in this section shall have access to student records.” N.J.A.C. 6A:32-7.5(e) identifies the limited organizations, agencies or persons which have a right to access. The record reflects

that information contained in student records regarding G.C., specifically, her schedule for the upcoming school year, was disclosed to people not identified by N.J.A.C. 6A:32-7.5(e). Accordingly, I **CONCLUDE** that respondent did not maintain G.C.'s student records in a manner so as to provide general protection for the right of G.C. to reasonable privacy.

However, the record further reflects that respondent acknowledges this breach and has taken steps to ensure that it does not happen again. Mr. Madigan offered detailed testimony demonstrating that the district took the matter seriously and took steps to prevent a repeat and took action as necessary to address the matter with the responsible personnel. It is further clear that respondent took into account petitioner's request at to class assignment which stemmed from the disclosure of the information. Although N.J.A.C. 6A:32-7.7 does give parents a right to appeal impermissible disclosure of a student record, the regulation seems to contemplate a prospective action to stay disclosure rather than to address a disclosure after it occurred, as with the present matter.

To the extent that the matter was transmitted by the Commissioner to the OAL as a challenge to G.C.'s schedule, the record reflects that the district accommodated petitioner's request in making a change to G.C.'s schedule. Accordingly, I **CONCLUDE** that the matter as transmitted is moot, as petitioner received the relief that was sought.

### **ORDER**

Based on the foregoing, I **ORDER** that the petition be **DISMISSED**.

I hereby **FILE** this initial decision with the **COMMISSIONER OF THE DEPARTMENT OF EDUCATION** for consideration.

This recommended decision may be adopted, modified or rejected by the **COMMISSIONER OF THE DEPARTMENT OF EDUCATION**, who by law is authorized

to make a final decision in this matter. If the Commissioner of the Department of Education does not adopt, modify or reject this decision within forty-five days and unless such time limit is otherwise extended, this recommended decision shall become a final decision in accordance with N.J.S.A. 52:14B-10.

Within thirteen days from the date on which this recommended decision was mailed to the parties, any party may file written exceptions with the **COMMISSIONER OF THE DEPARTMENT OF EDUCATION, ATTN: BUREAU OF CONTROVERSIES AND DISPUTES, 100 Riverview Plaza, 4th Floor, PO Box 500, Trenton, New Jersey 08625-0500**, marked "Attention: Exceptions." A copy of any exceptions must be sent to the judge and to the other parties.



October 5, 2017 \_\_\_\_\_

DATE

\_\_\_\_\_  
**ELIA A. PELIOS, ALJ**

Date Received at Agency: \_\_\_\_\_

Date Mailed to Parties: \_\_\_\_\_

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## **APPENDIX**

### **WITNESSES**

#### **For Petitioner:**

T.T.  
P.C.

#### **For Respondent:**

Bryan Madigan

### **EXHIBITS**

#### **For Petitioner:**

- P-1 Copy of Cease and Desist Email Correspondence, from Valter H. Must, Esq., Carluccio, Leone, Dimon, Doyle & Sacks, L.L.C., dated February 6, 2015, at 5:15 p.m.
- P-2 Copy of Correspondent to Mrs. Curci (T.T.) from Valter H. Must, Esq., Concerning Standard Protocol in Communicating with School Administration
- P-3 Photographs
- P-4 Representation Letter from Brian M. Cige, Esq., to Valter H. Must, Esq., Concerning Cease and Desist Letter, dated February 6, 2016, and Settlement Agreement, dated January 21, 2014
- P-5 Text Message Conversation
- P-6 Statement from G.C. Concerning Class Schedules
- P-6 Email from Brian Cige, Esq., to T.T., Regarding the outline of HIB, dated April 28, 2016



P-7 Email Conversation between T.T., Geetee7@aol.com, and Dr. Marc Natanagra, Concerning Release of G.C.'s Private Student Information at Toms River East, dated August 26, 2015

**For Respondent:**

- R-1 Toms River Regional Schools Investigation Report - Non-Pupil Accused, written February 25, 2015
- R-2 Toms River Regional Schools Investigation Report - Non-Pupil Accused, written March 2, 2015
- R-3 Toms River Regional Schools Investigation Report - Non-Pupil Accused, written May 1, 2015
- R-4 Cease and Desist Letter from Valther (sic) H. Must, Esq., Carluccio, Leone, Dimon, Doyle & Sacks, L.L.C., to Tina Tillem-Curci, dated February 6, 2015
- R-5 Cover letter from Valter H. Must, Esq., enclosing emails, date April 29, 2016