

New Jersey Commissioner of Education
Final Decision

S.S., on behalf of minor child, T.S.,

Petitioner,

v.

Board of Education of the Borough of Woodcliff
Lake, Bergen County,

Respondent.

The record of this matter, the Initial Decision of the Office of Administrative Law (OAL), the exceptions filed by petitioner pursuant to *N.J.A.C. 1:1-18.4*, and the Woodcliff Lake Board of Education's (Board) reply thereto, have been reviewed and considered.

Petitioner appealed the Board's determination that his child, T.S., committed an act of harassment, intimidation, and bullying (HIB) when he called another student "autistic." The Administrative Law Judge (ALJ) concluded that T.S.'s conduct met the statutory criteria for an act of HIB and that the Board's decision was not arbitrary, capricious, or unreasonable.

In his exceptions, petitioner argues that there are disputed issues of material fact that require a hearing, including whether T.S. actually used the word "autistic," whether the victim's crying occurred before or after the alleged comment, and whether T.S.'s statements were misheard, misinterpreted, or coerced by a school official. According to petitioner, the witness statements are contradictory and there is no firsthand confirmation of key facts, but only

hearsay. Petitioner also contends that the ALJ ignored several procedural violations, both during the investigation itself and in the Board's review of and hearing regarding the investigation. Finally, according to petitioner, T.S.'s conduct does not meet the statutory criteria for an act of HIB.

In response, the Board argues that there are no disputed issues of material fact, as multiple witnesses heard T.S. call the victim "dumb" and/or "autistic" and that T.S. admitted to calling the victim "dumb." The Board contends that the ALJ appropriately looked at the record developed in the HIB investigation to determine whether the Board's decision was arbitrary, capricious, or unreasonable, and correctly concluded that it was not. Finally, the Board argues that petitioner provided no evidence to support his claims of procedural violations and, even if such violations occurred, they do not provide a basis to overturn the Board's decision.¹

Upon review, the Commissioner concurs with the ALJ that petitioner failed to satisfy his heavy burden of demonstrating that the Board acted arbitrarily, capriciously, or unreasonably when it determined that T.S. committed an act of HIB. When a local board of education acts within its discretionary authority, its decision is entitled to a presumption of correctness and will not be disturbed unless there is an affirmative showing that the decision was "patently arbitrary, without rational basis or induced by improper motives." *Kopera v. Bd. of Educ. of W. Orange*, 60 *N.J. Super.* 288, 294 (App. Div. 1960). Furthermore, "where there is room for two opinions, action

¹ The Board also contends that the petition of appeal did not list reversal of the Board's decision as one of the forms of relief petitioner was seeking. While the Board is technically correct, the Commissioner finds that it is appropriate to afford petitioner some leeway as a pro se petitioner and, because the complete context of the petition demonstrates that petitioner is appealing the Board's decision and the proceedings at the OAL addressed that issue, it is also appropriate to address herein whether the Board's decision should be reversed.

is not arbitrary or capricious when exercised honestly and upon due consideration[,]” and the Commissioner will not substitute his judgment for that of the board. *Bayshore Sewerage Co. v. Dep’t of Env’t Prot.*, 122 N.J. Super. 184, 199 (Ch. Div. 1973), *aff’d*, 131 N.J. Super. 37 (App. Div. 1974). Regarding HIB determinations, this standard has been explained as requiring a petitioner to “demonstrate that the Board acted in bad faith, or in utter disregard of the circumstances before it.” *G.H. and E.H. o/b/o K.H. v. Bd. of Educ. of Borough of Franklin Lakes, Bergen Cty.*, EDU 13204-13 (Initial Decision Feb. 24, 2014), *adopted* Commissioner Decision No. 157-14 (Apr. 10, 2014).

Here, the Commissioner finds that the record contains substantial credible evidence providing a reasonable basis to support the Board’s HIB determination. Substantial evidence has been defined as “such evidence as a reasonable mind might accept as adequate to support a conclusion.” *In re Pub. Serv. Elec. & Gas Co.*, 35 N.J. 358, 376 (1961) (quoting *In re Hackensack Water Co.*, 41 N.J. Super. 408, 418 (App. Div. 1956)). The term has also been defined as “evidence furnishing a reasonable basis for the agency’s action.” *McGowan v. N.J. State Parole Bd.*, 347 N.J. Super. 544, 562 (App. Div. 2002).

The record reflects that the district’s Anti-Bullying Specialist (ABS) conducted an investigation of the HIB allegation that included both T.S.’s version of events and the victim’s. The ABS also interviewed several student witnesses, one of whom stated that he heard T.S. call the victim autistic, and another of whom stated that T.S. called the victim “dumb.”² T.S. admitted to the ABS that he called the victim “dumb,” which he later confirmed in a written statement submitted by his parents to the Board during the hearing process. Additionally, while T.S. denied

² A third student witness reported that T.S. and the victim were not talking nicely to each other.

to the ABS that he called the victim “autistic,” during a conversation with a teacher immediately following the incident, T.S. did not deny that he called the victim “autistic,” and instead said, “I said it because [the victim] said something mean first.” After reviewing all of the evidence, the ABS concluded that it supported a finding of HIB, as did the Board. Even crediting T.S.’s later denial in his written statement that he called the victim “autistic,” there is no dispute that he called the victim “dumb,” a comment that is sufficient on its own to support the Board’s finding of HIB. As to calling the victim “autistic,” while the evidence could leave room for two opinions as to whether this comment occurred, that is an insufficient reason for the Commissioner to overturn the Board’s decision. Petitioner has not shown that the Board’s determination was arbitrary, without rational basis, or induced by improper motives. Nor has petitioner demonstrated that the Board acted in bad faith or in utter disregard of the circumstances before it.

The Commissioner is also in accord with the ALJ’s determination that all requisite elements of the statutory definition of HIB, codified at *N.J.S.A. 18A:37-14*, were satisfied in this case. In sum, a finding of HIB requires three elements under the Act. First, the conduct must be reasonably perceived as being motivated by any actual or perceived characteristic expressly identified in the statute, or by any other distinguishing characteristic. Second, the conduct must substantially disrupt or interfere with the rights of other students or the orderly operation of the school. Third, one of the three conditions set forth in subsections (a), (b), and (c) must be satisfied. *Wehbeh v. Bd. of Educ. of the Twp. of Verona, Essex Cnty.*, Commissioner Decision No. 510-20 (Feb. 4, 2020). Contrary to petitioner’s argument, these issues do not require an evidentiary hearing to resolve. T.S. admitted to using the term “dumb” during an argument with

the victim. In light of this undisputed fact, the Commissioner finds that it was not arbitrary, capricious, or unreasonable to find that the victim reasonably perceived T.S.'s comments as being motivated by a perceived disability, that the comments substantially interfered with the victim's rights, and that the comments were demeaning and had the effect of causing emotional harm.

Nor is the lack of signed witness statements a procedural violation. The Act "does not define acceptable sources of information regarding HIB allegations, nor does the Act contain any requirements related to hearsay or corroboration." *L.K. and T.K. o/b/o A.K. v. Bd. of Educ. of Mansfield, Burlington Co.*, Commissioner Decision No. 318-21 (Dec. 9, 2021); *aff'd*, 2023 N.J. Super. Unpub. LEXIS 1788 (App. Div. Oct. 17, 2023). Regarding other alleged procedural violations, the Commissioner finds that petitioner's concerns related to the conduct of the Board's HIB hearing, even if true, do not warrant overturning the Board's decision, nor do minor discrepancies regarding the facts as reported by various witnesses. Finally, petitioner provides no evidence to support his contention that T.S. was "coerced" or "intimidated."

Accordingly, the Initial Decision is adopted as the final decision in this matter, and the petition of appeal is hereby dismissed.

IT IS SO ORDERED.³


COMMISSIONER OF EDUCATION

Date of Decision: November 17, 2025
Date of Mailing: November 17, 2025

³ This decision may be appealed to the Appellate Division of the Superior Court pursuant to *N.J.S.A. 18A:6-9.1*. Under *N.J.Ct.R. 2:4-1(b)*, a notice of appeal must be filed with the Appellate Division within 45 days from the date of mailing of this decision.



State of New Jersey
OFFICE OF ADMINISTRATIVE LAW

INITIAL DECISION

SUMMARY DECISION

OAL DKT. NO. EDU 12063-24

AGENCY DKT. NO. 243-7/24

S.S. ON BEHALF OF MINOR CHILD T.S.,

Petitioner,

v.

**BOARD OF EDUCATION OF THE BOROUGH
OF WOODCLIFF LAKE, BERGEN COUNTY,**

Respondent.

S.S., petitioner, pro se

Robert D. Lorfink, Esq., for respondent (Fogarty, Hara, LaPira & Cherry, LLC,
attorneys)

Record Closed: September 12, 2025

Decided: October 2, 2025

BEFORE **PATRICE E. HOBBS**, ALJ:

STATEMENT OF THE CASE

Petitioner's son was accused of being intentionally verbally abusive to another student based on his intellectual and developmental characteristics, causing him to cry. Respondent investigated the incident and concluded that there was an incident of

harassment, intimidation and bullying (HIB) under the Anti-Bullying Bill of Rights Act, N.J.S.A. 18A:37-13, et seq. (ABBRA). Should the respondent's findings be overturned? No. A school board acting within the scope of its authority is "entitled to a presumption of correctness unless it's arbitrary, capricious, or unreasonable." Thomas v. Bd. of Educ., 89 N.J. Super. 327, 332 (App. Div. 1965).

PROCEDURAL HISTORY

On July 29, 2024, petitioner S.S., on behalf of minor child T.S., filed a petition of appeal with the Commissioner of Education, Office of Controversies and Disputes. On August 16, 2024, respondent filed its answer. On August 19, 2024, the case was transmitted to the Office of Administrative Law as a contested case under N.J.S.A. 52:14B-1 to -15; N.J.S.A. 52:14F-1 to -23.

A prehearing conference was scheduled for September 18, 2024. On September 17, 2024, an attorney made an appearance on behalf of petitioner, and an adjournment of the prehearing conference was granted. A second prehearing conference was scheduled for October 17, 2024, and the attorney did not appear. On October 22, 2024, I held a prehearing conference; petitioner confirmed he was proceeding pro se, and I entered an order outlining the deadlines for discovery and motions for summary decision. On January 31, 2025, respondent filed a motion for summary decision. Petitioner requested and was granted an extension of time to file his opposition.

On March 14, 2025, petitioner filed a Motion to Compel the name and contact information for a student attending Woodcliff Lake Elementary School. On March 26, 2025, I entered an order denying the petitioner's Motion to Compel as protected information under N.J.A.C. 6A:32-2.1 and the Family Education Rights and Privacy Act (FERPA).

On February 18, 2025, petitioner propounded interrogatories and document requests to respondent. On April 8, 2025, respondent issued written objections to petitioner's discovery. On April 16, 2025, I entered an order sustaining respondent's objection to Interrogatories Nos. 1, 2, 3, 4(b), 9 and 10, and ordering respondent to

provide answers to the remaining interrogatories. I also sustained respondent's objections to documents 9 and 10 and requests numbered 1, 2, 3, 4, 6, 7, 8, 9, 10, 11 and 13 and ordered the respondent to provide responses to the remaining document requests.

On June 3, 2025, I held a status conference and entered an order outlining the deadlines for petitioner's opposition to the respondent's motion for summary decision and respondent's reply. On August 25, 2025, petitioner filed his opposition. On September 12, 2025, respondent filed its reply, and I closed the record.

FINDINGS OF FACT

Based upon the documents the parties submitted and my assessment of their sufficiency, I **FIND** the following **FACTS**:

Woodcliff Lake Board of Education is the public school district for the Borough of Woodcliff Lake, New Jersey. It operates an elementary school and a middle school. High school students attend Pascack Hills High School. It enacted District Policy 5512, Harassment, Intimidation, and Bullying (R-F), in 2003 to comply with the New Jersey Anti-Bullying Bill of Rights. N.J.S.A. 18A:37-13, et seq.

At the time of the alleged incident, T.S. was a student at Dorchester Elementary School in Woodcliff Lake.

On March 1, 2024, Isabella Zigman, a teacher's aide, filed a Written Report of Alleged HIB Incident (R-A), alleging that during gym class, T.S. called another student, the victim, "autistic." The student began to cry.

On March 1, 2024, Stefanie Marsich, the anti-bullying specialist, telephoned the parent of the victim, providing the details of the alleged incident and the HIB process. The parent of the victim stated that his child was not autistic, that there is a lot of misbehaving in the fifth grade, and that there is a student who curses in another language. Marsich also spoke with the victim. The victim stated that he was on the basketball drill team in

PE class with T.S. and two other witnesses, Witness 3 and Witness 4. T.S. and Witness 3 told the victim that they did not “need a particular supply,” and the victim told T.S. that “not everyone plays competitive basketball.” T.S. then told the victim that he was “weird” and “autistic,” causing the victim to cry. The victim told Marsich that that was the moment that he “broke.” The victim told Marsich that he and T.S. usually got along fine, that he had not heard T.S. speak like that before or say such things to others and that it would be helpful if T.S. apologized.

Marsich also spoke with T.S. T.S. told her he played competitive basketball outside of school. T.S. had missed a basketball shot, and the victim asked T.S. if he played competitive basketball. T.S. said that he did, and the victim replied that his expectations in basketball are not as high as T.S.’s and that he was better than T.S. T.S. told Marsich that he told the victim to “shut up” and “stop talking.” T.S. denied calling the victim autistic. T.S. was reminded that he had told Kyle Westervelt that he did not deny calling the victim “autistic.” T.S. told Marsich that he said the victim was “dumb,” that the victim told T.S. that he was “autistic,” and that T.S. said that he did not know he was “autistic.” T.S. stated that he only admitted to calling the victim “autistic” because the victim kept bugging him.

Marsich spoke with Zigman. Zigman stated that as she was walking out of PE, she heard that the victim was crying. She noticed that Westervelt was speaking with T.S. and heard him ask T.S. if he had called the victim “autistic.” Zigman found the victim and asked why he was crying. The victim stated that T.S. had called him “autistic.”

Marsich spoke with Westervelt. Westervelt stated that Velli reported that T.S. had called the victim “autistic.” Westervelt said that T.S. did not deny calling the victim “autistic” and said that he called him “autistic” in response to the victim saying something unkind. Westervelt did not say what the victim said to T.S.

Marsich spoke with Witness 3. Witness 3 stated that T.S. was playing hotshot, which is a basketball game. Witness 3 heard the victim tell T.S. to “stop” and “don’t hit me,” and that T.S. called the victim “dumb.” Witness 3 did not hear the victim say anything to T.S., did not see T.S. touch the victim, and believes that T.S. was upset because the

victim was not making any baskets. The victim was crying after T.S. called him “dumb,” and T.S. only said those harsh words to the victim.

Marsich also spoke with Witness 4. Witness 4 stated that the victim and T.S. were not talking nicely to each other. T.S. said that the victim was not good at basketball and that the victim said he was better than T.S. The victim and T.S. said things back and forth to each other, but T.S. used more inappropriate and harsh words. Shortly after that, she saw the victim walk away and was crying.

Marsich also spoke with Witness 5. Witness 5 said that T.S. and the victim were having a “little” argument in basketball but did not hear the entire argument. Witness 5 stated that he heard T.S. call the victim “autistic” and that the victim said, “I am.”

Marsich also spoke with Karalyn Maggino, a lunch aide, who told her that a few days prior to the incident, T.S. asked to tell her a joke. T.S. said, “What do you call an autistic person with a gun?” She told T.S. that it was not an appropriate joke for school and that T.S. laughed.

On March 5, 2024, Marsich spoke with Z.S., the mother of T.S. Z.S. said that some of the boys on the basketball team are not nice to her son, and maybe the victim is one of those boys. Z.S. told Marsich that she would have T.S. apologize to the victim and would confirm whether T.S. did call the victim “autistic.” Marsich explained that T.S. had also used the word “autistic” in a joke during lunch. Z.S. explained that T.S. uses those jokes in the context of “yo mamma” but would tell T.S. it was not appropriate at school. Marsich stated that she would like to speak with Z.S., Ms. Velli and T.S. after school to discuss autism; however, Z.S. indicated she would like to obtain T.S.’s version of the incident before the meeting was scheduled. Marsich explained the HIB process. Z.S. said that a student had called T.S. “gay,” and that incident was not investigated. No HIB report was filed for this incident; Marsich was only told of the incident verbally, and she could not find any other students to corroborate the incident. Z.S. stated that the only reason that Marsich was investigating this report is because T.S. is Muslim.

On March 8, 2024, Marsich concluded that there was an incident of HIB that was based on a motivating factor, namely a mental, physical, or sensory disability; that it was a single incident that occurred on school property; that it resulted in the disruption of the rights of another student; that T.S. should have known that under the circumstances the conduct would have caused emotional harm that would have insulted or demeaned the victim; and that it created a hostile educational environment interfering with the victim's education. Marsich filed her report with Lauren Barbelet, the Superintendent of Woodcliff Lake School District.

On March 21, 2024, Barbelet informed T.S.'s parents of the findings (R-B), and petitioner requested a hearing. (R-C; R-D.) On May 2, 2024, the Board held a hearing. S.S. argued that there were procedural violations that violated T.S.'s constitutional rights; that there were no written statements from the victim or the witnesses; that there was a failure to maintain confidentiality; that the statements from the victim and witnesses were hearsay; that Marsich did not witness any of the comments; that Westervelt did not hear T.S. call the victim any names; that Westervelt isolated T.S. when he was being questioned and therefore intimidated him; and that the comments did not interfere with the victim's rights or disrupt his education.

The Board determined that there were no procedural violations and that there were no violations of T.S.'s constitutional rights. The Board also determined that the investigation complied with ABBRA and the Board's HIB policy. The Board concluded that the witnesses' statements and T.S.'s statements that the victim was "autistic," "weird" and "dumb" established a preponderance of credible evidence that T.S. did in fact make negative comments about the victim's perceived intellectual and developmental characteristics, that these comments upset the victim causing him to cry, and that this therefore interfered with the victim's education.

The Board determined that, considering T.S.'s school record, no discipline was warranted. The Board recommended remedial measures to inform him about autism and the need to be sensitive to words and phrases describing individuals and to learn appropriate methods for conflict resolution. Because discipline was not imposed, the

violation is not reported out of the district and will only be used in the future if there are other HIB violations.

On May 8, 2024, the Board sent a letter to S.S. and Z.S. (R-F) notifying them that the HIB finding was affirmed, that no discipline would be imposed, and that T.S. would be given instruction on autism and the need to be sensitive to words and phrases describing individuals and appropriate methods for conflict resolution.

CONCLUSIONS OF LAW

Summary decision “may be rendered if the papers and discovery which have been filed, together with the affidavits, if any, show that there is no genuine issue as to any material fact challenged and that the moving party is entitled to prevail as a matter of law.” N.J.A.C. 1:1-12.5(b). This rule is substantially like the summary judgment rule embodied in the N.J. Court Rules, R. 4:46-2. See Judson v. Peoples Bank & Trust Co. of Westfield, 17 N.J. 67, 74 (1954). All inferences of doubt are drawn against the party filing the motion and in favor of the party against whom the motion is directed. Id. at 75. The judge’s function is to determine whether there are genuine issues of fact to be adjudicated. Brill v. Guardian Life Ins. Co., 142 N.J. 520 (1995).

Having read the briefs and certifications and having reviewed the exhibits, I **CONCLUDE** that no issues of material fact exist and that the case is ripe for summary decision.

The Anti-Bullying Bill of Rights Act (“Act”), N.J.S.A. 18A:37-13 et seq., is designed “to strengthen the standards and procedures for preventing, reporting, investigating, and responding to incidents of harassment, intimidation, and bullying [HIB] of students that occur in school and off school premises.” The procedures for investigating a report of a HIB require that an investigation be initiated and completed no later than ten days from the date of the report of the HIB incident. N.J.S.A. 18A:37-15(6)(b).

A finding of HIB requires three elements. First, the conduct must be reasonably perceived as being motivated by any actual or perceived enumerated characteristic or other distinguishing characteristic. Enumerated characteristics include race, color, religion, ancestry, national origin, gender, sexual orientation, gender identity and expression, mental, physical or sensory disability, or any other distinguishing characteristic. Second, the conduct must substantially disrupt or interfere with the rights of other students or the orderly operation of the school. Third, one of the three criteria enumerated in the Act regarding the effect of the conduct must also be satisfied. N.J.S.A. 18A:37-14. The conduct must also take place on school property, at a school-sponsored function, on a school bus, or off school grounds as provided for in N.J.S.A. 18A:37-15.3. Finally, HIB means any gesture, any written, verbal or physical act, or any electronic communication that “a reasonable person should know, under the circumstances, will have the effect of physically or emotionally harming a student,” “has the effect of insulting or demeaning any student,” or “creates a hostile educational environment.” N.J.S.A. 18A:37-14.

When a local board of education acts within its discretionary authority, its decision is entitled to a presumption of correctness and will not be disturbed unless there is an affirmative showing that the decision was “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). Furthermore, “where there is room for two opinions, action is not arbitrary or capricious when exercised honestly and upon due consideration,” and the commissioner will not substitute his judgment for that of the board. Bayshore Sewerage Co. v. Dep’t of Env’t. Prot., 122 N.J. Super. 184, 199 (Ch. Div. 1973).

T.S. and the victim were playing basketball during gym class at the elementary school. At some point, the two exchanged comments. T.S.’s comments escalated, and he called the victim several names, including “weird,” “dumb” and “autistic.” There were several witnesses to the exchange between T.S. and the victim. At first, T.S. denied calling the victim any names. However, when Marsich pointed out his conflicting statements to Westervelt, T.S. admitted that he did call the victim “dumb” and only called the victim “autistic” because the victim kept bugging him. T.S. knew that the comments were hurtful and knew that they would cause the victim to cry. T.S. knew his comments

were inappropriate prior to this incident. T.S. was told that such comments were not appropriate for school.

Petitioner raises the same arguments that he raised at the Board hearing. Petitioner argues that the HIB investigation did not have any signed witness statements, there was a breach of confidentiality, and the witness statements were contradictory and hearsay. ABBRA does not require signed witness statements. ABBRA only requires that the investigation be completed within ten days of the report of the HIB incident. It does not specify how the investigation should be conducted or whether written statements are a necessary requirement of the investigation. The Board's policy mirrors ABBRA.

The Board complied with the statute. It retained an antibullying investigator, Marsich. The investigation took place within the required time frame, seven days from the time of the incident report and the time of completion of the investigation and was reported to petitioners. The investigation concluded that there was an incident of HIB, but that discipline was not necessary. Marsich recommended T.S. attend an afternoon information session about autism and that he learn the need to be sensitive to words and phrases describing individuals and appropriate methods for conflict resolution. The statute permits the Board to affirm, reject, or modify Marsich's decision, which it did.

Therefore, I **CONCLUDE** that there was a violation of ABBRA because T.S. admitted to calling the victim's names motivated by the victim's perceived mental, physical or sensory disability, which resulted in the victim being reduced to tears. T.S. knew his actions would cause the victim emotional harm, which violated the victim's rights and therefore interfered with the victim's education. I **FURTHER CONCLUDE** that the Board did not act arbitrarily, capriciously, or unreasonably in affirming the investigation report.

ORDER

I **ORDER** that respondent's motion for summary decision is **GRANTED**, and the petition is **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**. Exceptions may be filed by email to ControversiesDisputesFilings@doe.nj.gov or by mail to Office of Controversies and Disputes, 100 Riverview Plaza, 4th Floor, PO Box 500, Trenton, New Jersey 08625-0500. A copy of any exceptions must be sent to the judge and to the other parties.

October 2, 2025

DATE



PATRICE E. HOBBS, ALJ

Date Received at Agency:

October 2, 2025

Date Mailed to Parties:

October 2, 2025

APPENDIX

Moving papers for petitioner:

Opposition to Motion for Summary Decision, dated August 24, 2025

Moving papers for respondent:

Motion for Summary Decision with Brief with Exhibits A–F, dated January 31, 2025

Respondent's Reply, dated September 12, 2025

EXHIBITS

For petitioner

None

For respondent:

Exhibit A – HIB Investigation Report # 2022-23/18 THS-10, dated March 8, 2024

Exhibit B – Woodcliff Lake's letter to petitioner, dated March 21, 2024

Exhibit C – Petitioner's letter to Woodcliff Lake, dated April 3, 2024

Exhibit D – Petitioner's email to Woodcliff Lake, dated April 6, 2024

Exhibit E – Woodcliff Lake's letter to petitioner, dated May 8, 2024

Exhibit F – Woodcliff Lake's Board Policy No. 5512