

Before the School Ethics Commission
Docket No.: C85-24
Final Decision
Summary Disposition

**Christine Reese,
Complainant**

v.

**Karina Ramos,
Millstone Board of Education, Monmouth County,
Respondent**

I. Procedural History

The above-captioned matter arises from a Complaint that was filed with the School Ethics Commission (Commission) on October 22, 2024, by Christine Reese (Complainant), alleging that Karina Ramos (Respondent), a member of the Millstone Board of Education (Board), violated the School Ethics Act (Act), *N.J.S.A. 18A:12-21 et seq.* More specifically, the Complaint avers that Respondent violated *N.J.S.A. 18A:12-25* and *N.J.S.A. 18A:12-26* related to the annual filing of the Personal/Relative and Financial Disclosure Statements (Disclosure Statements). Respondent filed a Written Statement on December 16, 2024.

The parties were notified by correspondence dated June 10, 2025, that the above-captioned matter would be discussed by the Commission at its meeting on June 17, 2025, in order to make a determination regarding probable cause. Following its discussion on June 17, 2025, the Commission adopted a decision at its meeting on July 22, 2025, finding that there are sufficient facts and circumstances pled in the Complaint and in the Written Statement to lead a reasonable person to believe that *N.J.S.A. 18A:12-25(b)*, *N.J.S.A. 18A:12-25(c)*, *N.J.S.A. 18A:12-26(a)(1)* and *N.J.S.A. 18A:12-26(a)(4)* were violated as set forth in the Complaint. Additionally, the Commission voted to decide the above-captioned matter by summary decision, in accordance with *N.J.A.C. 6A:28-9.8(c)*, and directed Respondent to file a statement setting forth the reasons (Statement of Reasons) she should not be found in violation of the Act. Respondent was advised that if she disputes any of the facts determined by the Commission to be both material and undisputed, she should set forth the facts with which she disagrees, and why they are material to the case. Finally, Respondent was advised that the Commission may then make a determination of a violation on a summary basis. Respondent filed a Statement of Reasons on August 9, 2025.

Consequently, at its meeting on August 19, 2025, the Commission reviewed the record in this matter and, at its meeting on September 23, 2025, adopted a decision finding that

Respondent violated *N.J.S.A.* 18A:12-25(b), *N.J.S.A.* 18A:12-25(c), and *N.J.S.A.* 18A:12-26(a)(4) and recommending a penalty of a reprimand for Respondent's violation of the Act.

II. Summary of the Pleadings

A. *The Complaint*

According to Complainant, as a Board member, Respondent is required to complete Disclosure Statements. Complainant maintains that Section III, question 1, of the Disclosure Statements form requires that the school official provide financial information related to the school official's or a member of their immediate family's source of income, namely whether in the preceding calendar year, the school official or a member of their immediate family received income, earned or unearned, in excess of \$2,000.00. However, Complainant further maintains Respondent "fail[ed] to list the business she own[ed]" on her 2024 Disclosure Statements. More specifically, Complainant asserts that based on the information contained on Respondent's 2024 Disclosure Statements, Respondent did not list the company she owns with her spouse, Legend Pest Control, in Section III, question #1, on the Disclosure Statements and also neglected to include the business as an interest in Section III, question #4. Therefore, Complainant alleges that Respondent is in violation of *N.J.S.A.* 18A:12-25 and *N.J.S.A.* 18A:12-26.

B. *Written Statement*

Respondent admits that she and her spouse own a business and that she "should have listed [the company] on her" Disclosure Statements, and failing to do so was human error. Respondent contends that "she did not list the business that she and her husband own and operate . . . as a source of income under Section III #1 of the 2024 [Disclosure Statements] since the company's clients are billed through the business, individuals pay their client fees for services and receive customer receipts from and through [the company]." Respondent further contends her "understanding of the instructions led her to believe that the company did not have to be separately reported as a source of income." Respondent asserts she "did not know at the time she filled out the [Disclosure Statements], and still believes at this point in time, that she is not required to identify the business she and her husband own as a source of income." In sum, Respondent admits to her "human error," and notes she attempted to fix it after it was brought to her attention by attempting "to file an Amended [Disclosure Statements] with the Department of Education" and also providing "an updated statement to the District [Business Administrator]."

C. *Statement of Reasons*

Respondent admits that she and her spouse own Legend Pest Control. She concedes that she should have listed the company as a business organization that she had an interest in on her Disclosure Statements. However, she states that neither she nor her spouse received income from the company. She also maintains that she "did not know at the time she signed the disclosure that she was making an error" and attempted to refile as soon as she was aware of the error.

Respondent notes that she and her spouse each have individual employers unrelated to Legend Pest Control and have income from those sources which was reported on the Disclosure Statements.

III. Findings of Fact

Based on its thorough and independent review of the record, the Commission finds the following facts to be undisputed:

1. Respondent has been a Board member in Millstone Township (District) since January 2024. *Statement of Reasons* at page 1.
2. As a Board member, Respondent was required to file Disclosure Statements. *Statement of Reasons* at page 1.
3. Respondent submitted her 2024 FDS on or about March 21, 2024. *Statement of Reasons* at page 2.
4. Respondent and her spouse own Legend Pest Control. *Statement of Reasons* at page 2.
5. Respondent did not disclose Legend Pest Control as a business organization in which she and her spouse have an interest in on her 2024 Disclosure Statements. *Statement of Interest* at page 4.
6. Respondent and her spouse received income from other sources which she disclosed on the 2024 Disclosure Statements. *Statement of Interest* at page 3.

IV. Analysis and Conclusions of Law

Complainant alleges that Respondent violated *N.J.S.A. 18A:12-25(b)* and *N.J.S.A. 18A:12-25(c)*, and these provisions provide:

- b. Each statement shall be signed by the school official filing it, and the school official's signature shall constitute a representation of the accuracy of the contents of the statement.
- c. A school official who fails to file a statement or who files a statement containing information which the school official knows to be false shall be subject to reprimand, censure, suspension, or removal pursuant to the procedures established in section 9 of P.L.1991, c.393 (C.18A:12-29). Nothing in this subsection shall be construed to prevent or limit criminal prosecution.

Complainant further alleges that Respondent violated *N.J.S.A. 18A:12-26(a)(1)* and *N.J.S.A. 18A:12-26(a)(4)*, which provides:

Each school official shall annually file a financial disclosure statement with the School Ethics Commission. All financial disclosure statements

filed pursuant to this act shall include the following information which shall specify, where applicable, the name and address of each source and the school official's position:

- (1) Each source of income, earned or unearned, exceeding \$2,000 received by the school official or a member of his immediate family during the preceding calendar year. Individual client fees, customer receipts or commissions on transactions received through a business organization need not be separately reported as sources of income. If a publicly traded security or interest derived from a financial institution is the source of income, the security or interest derived from a financial institution need not be reported unless the school official or member of his immediate family has an interest in the business organization or financial institution;
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- (4) The name and address of all business organizations in which the school official or a member of his immediate family had an interest during the preceding calendar year.

The Commission finds that Respondent inaccurately completed her 2024 Disclosure Statements when she did not include a business organization in which she and her spouse have an interest, and therefore, she violated *N.J.S.A. 18A:12-25(b)*. As for *N.J.S.A. 18A:12-25(c)*, Respondent knew or should have known that her Disclosure Statements were inaccurate when they were submitted, and therefore, the Commission finds that she has violated *N.J.S.A. 18A:12-25(c)*. As to *N.J.S.A. 18A:12-26(a)(4)*, the Commission finds that Respondent did not include a business organization (Legend Pest Control) in which both she and her spouse had an interest on her 2024 Disclosure Statements, and therefore, she violated *N.J.S.A. 18A:12-26(a)(4)*.

However, the Commission finds that there is no evidence that Respondent or her spouse received income from Legend Pest Control in 2023, and therefore, does not find a violation of *N.J.S.A. 18A:12-26(a)(1)*.

V. Recommended Penalty

Having found that Respondent violated *N.J.S.A. 18A:12-25(b)*, *N.J.S.A. 18A:12-25(c)*, and *N.J.S.A. 18A:12-26(a)(4)*, the Commission is authorized to recommend to the Commissioner of Education (Commissioner) an appropriate penalty, which may range from reprimand to removal. *N.J.S.A. 18A:12-29(c)*.

In its review, the Commission finds that a reprimand is the most appropriate penalty. The Commission takes into account that it was Respondent's first time filing the Disclosure Statements and she acknowledges that the business organization in which she has an interest should have been disclosed on her Disclosure Statements. For all of these reasons, the Commission finds a reprimand to be warranted in this matter.

VI. Decision

For the reasons set forth above, the Commission recommends that the Commissioner impose a penalty of **reprimand** for the violations of *N.J.S.A. 18A:12-25(b)*, *N.J.S.A. 18A:12-25(c)*, and *N.J.S.A. 18A:12-26(a)(4)*.

Pursuant to *N.J.S.A. 18A:12-29(c)*, this decision shall be forwarded to the Commissioner for review of the Commission's recommended penalty. The parties may either: 1) file exceptions to the recommended sanction; 2) file an appeal of the Commission's finding of a violation; or 3) file both exceptions to the recommended sanction together with an appeal of the finding of a violation.

Parties taking exception to the recommended sanction of the Commission but ***not disputing*** the Commission's finding of a violation may file, **within thirteen (13) days** from the date the Commission's decision is forwarded to the Commissioner, written exceptions regarding the recommended penalty to the Commissioner. The forwarding date shall be the mailing date to the parties, as indicated below. Such exceptions must be forwarded to: Commissioner of Education, c/o Office of Controversies and Disputes, P.O. Box 500, Trenton, New Jersey 08625, marked "Attention: Comments on Ethics Commission Sanction," as well as to (ControversiesDisputesFilings@doe.nj.gov). A copy must also be sent to the Commission (school.ethics@doe.nj.gov) and all other parties.

Parties seeking to appeal the Commission's finding of a violation ***must*** file an appeal pursuant to the standards set forth at *N.J.A.C. 6A:4:1 et seq.* **within thirty (30) days** of the filing date of the decision. The filing date shall be three (3) days after the date of mailing to the parties, as shown below. In such cases, the Commissioner's review of the Commission's recommended sanction will be deferred and incorporated into the Commissioner's review of the finding of violation on appeal. Where a notice of appeal has been filed on or before the due date for exceptions to the Commission's recommended sanction (thirteen (13) days from the date the decision is mailed by the Commission), exceptions need not be filed by that date, but may be incorporated in the appellant's briefs on appeal.

Robert W. Bender, Chairperson

Mailing Date: September 23, 2025

***Resolution Adopting Decision
in Connection with C85-24***

Whereas, at its meeting on August 19, 2025, the School Ethics Commission (Commission) considered the Complaint, Written Statement, and Statement of Reasons submitted by Respondent, in this matter; and

Whereas, at its meeting on August 19, 2025, the Commission discussed finding a violation of *N.J.S.A.* 18A:12-25(b), *N.J.S.A.* 18A:12-25(c), and *N.J.S.A.* 18A:12-26(a)(4); and

Whereas, at its meeting on August 19, 2025, the Commission discussed recommending a penalty of reprimand for the violations of *N.J.S.A.* 18A:12-25(b), *N.J.S.A.* 18A:12-25(c), and *N.J.S.A.* 18A:12-26(a)(4); and

Whereas, at its meeting on September 23, 2025, the Commission reviewed and voted to approve the within decision as accurately memorializing its actions/findings from its meeting on August 19, 2025; and

Now Therefore Be It Resolved, that the Commission hereby adopts the decision and directs its staff to notify all parties to this action of its decision herein.

Robert W. Bender, Chairperson

I hereby certify that the Resolution was duly adopted by the School Ethics Commission at its meeting on September 23, 2025.

Brigid C. Martens, Director
School Ethics Commission