

***Before the School Ethics Commission
Docket No.: C05-26 and C27-26 (Consolidated)
Decision on Probable Cause***

**Corrie Decker,
Complainant**

v. SEC Docket No.: C05-26

**Dr. Kristin O’Neil,
Lindenwold Board of Education,
Camden County,
Respondent**

**Corrie Decker,
Complainant**

v. SEC Docket No.: C27-26

**Dr. Kristin O’Neil,
Lindenwold Board of Education,
Camden County,
Respondent**

I. Procedural History

The above-captioned consolidated matter arises from two separate but related Complaints that were filed with the School Ethics Commission (Commission) by Corrie Decker (Complainant), alleging that Dr. Kristin O’Neil (Respondent), Superintendent of the Lindenwold School District (District), violated the School Ethics Act (Act), *N.J.S.A.* 18A:12-21 *et seq.*

More specifically, in the matter docketed as C05-26, filed on January 20, 2026¹, Complainant alleges that Respondent violated *N.J.S.A.* 18A:12-24(b). In the matter docketed as C27-26, received by the Commission on February 13, 2026,² Complainant alleges that Respondent violated *N.J.S.A.* 18A:12-24(a), *N.J.S.A.* 18A:12-24(b), *N.J.S.A.* 18A:12-24(c), *N.J.S.A.* 18A:12-24(d), and *N.J.S.A.* 18A:12-24(f). On February 4, 2026, and April 15, 2026, respectively, Respondent filed Written Statements, which included allegations that the

¹ On January 10, 2026, Complainant filed a deficient Complaint; however, on January 20, 2026, Complainant cured all defects and filed an Amended Complaint that was deemed compliant with the requirements detailed in *N.J.A.C.* 6A:28-6.3.

² The Complaint was received by the State Ethics Commission February 3, 2026, and forwarded to the Commission on February 13, 2026.

Complaints are frivolous. On February 14, 2026, and May 1, 2026, respectively, Complainant filed responses to the allegations that the Complaints are frivolous.

By correspondence dated May 14, 2026, the parties were advised that, pursuant to its authority as set forth in *N.J.A.C. 6A:28-6.6*, the Commission determined to consolidate the matters docketed as C05-26 and C27-26. The Commission's decision to consolidate the above-noted Complaints was based on a review of (1) the identity of the parties in each of the matters; (2) the nature of all questions of fact and law respectively involved; (3) the advisability generally of disposing of all aspects of a controversy in a single proceeding; and (4) other matters appropriate to a prompt and fair resolution of the issues. More specifically, because both matters have the same parties, and each Complaint alleges that the same general conduct/action forms the basis for the alleged violations of the Act, the Commission determined that, in the interest of efficiency, it can resolve both Complaints in one consolidated matter.

The parties were notified by correspondence dated May 19, 2026, that the above-captioned consolidated matter would be discussed by the Commission at its meeting on May 26, 2026, to determine whether probable cause exists and whether the Consolidated Complaint is frivolous. Following its discussion on May 26, 2026, the Commission adopted a decision at its meeting on June 23, 2026, finding that there are insufficient facts and circumstances pled in the Complaints and in the Written Statements to lead a reasonable person to believe that the Act was violated as alleged in the Consolidated Complaint. The Commission also adopted a decision finding the Complaints not frivolous, and denying Respondent's requests for sanctions.

II. Summary of the Pleadings

A. *The Complaints*

According to the attached exhibits, Respondent/Superintendent emailed Complainant on December 23, 2025, and stated that “[t]he school asks that parents either pick up their child or make other arrangements within 1 hour of receiving a phone call informing them that their child needs to be picked up.” Complainant requested “a copy of the written policy” that requires this. Following an email exchange between the two parties, Complainant received correspondence from Respondent on January 9, 2026, which stated that “failure to pick up [her child] within the ‘reasonable time’ may constitute child neglect and may result in notification to New Jersey Division of Child Protection and Permanency [(DCPP)].” Complainant maintains Respondent did not cite a statute, regulation or Board policy; Respondent did not allege abuse, neglect or imminent danger; the communication occurred in a non-emergency context; the timing of the correspondence “demonstrates the reference was not a good-faith safety action; and Respondent “used her authority to pressure compliance.”

With the above in mind, in Count 1 (C05-26), Complainant asserts Respondent violated *N.J.S.A. 18A:12-24(b)* because she “used her position to coerce compliance with a non-existent policy” and her “conduct exceeded lawful authority and interfered with parental advocacy.”

In Count 2, (C27-26 Count 1), Complainant asserts that in the letter she received on January 9, 2026, Respondent “misused her position of authority, failed to exercise sound

professional judgment, and engaged in conduct prejudicial to the public trust by invoking child welfare threats in a non-protective, coercive manner” when Respondent stated in the correspondence that Complainant’s “failure to pick up [her] child within a ‘reasonable time’ for an informal removal could constitute child neglect and result in a [DCPP] referral.” Complainant further asserts Respondent’s action violates *N.J.S.A. 18A:12-24(a)*, *N.J.S.A. 18A:12-24(c)* and *N.J.S.A. 18A:12-24(d)*.

In Count 3 (C27-26 Count 2), Complainant maintains that on that same date, Respondent’s “reference to child neglect occurred during ongoing special education advocacy and records requests and had the effect of intimidating [Complainant] and interfering with [her] ability to advocate freely and lawfully for [her] child.” Complainant further maintains Respondent’s “decision to invoke [her] child’s past trauma in a non-supportive and punitive context also contributed to emotional distress and re-traumatization.” Complainant asserts Respondent violated *N.J.S.A. 18A:12-24(b)* and *N.J.S.A. 18A:12-24(d)* because her “conduct was not in the best interests of a student with disabilities and constituted intimidation and coercion incompatible with ethical educational leadership.”

In Count 4 (C27-26 Count 3), Complainant contends that Respondent used her official position to act in a manner that is unbecoming of a school administrator and inconsistent with the ethical standards of her office. Complainant further contends Respondent violated *N.J.S.A. 18A:12-24(f)* because she “weaponized the concept of mandated reporting as a compliance tactic.”

B. *Written Statements and Allegations of Frivolous Filing*

In her Written Statements, which include an allegation of frivolous filing, Respondent denies the allegations in both Complaints and notes that information regarding school procedures is provided to all families at the beginning of each school year and is posted on the District’s website. The procedures regarding student pick up are outlined in the information and Respondent maintains she was highlighting the procedures. Respondent argues that “[i]n no way did [she], or the [Board], secure any advantages whatsoever through notifying the Complainant about District procedures and the mandatory reporting requirements that school officials face.” Respondent further argues her conduct “did not exceed lawful authority and in no way interfered with parental advocacy or undermined the public trust,” and therefore, the Complaints are frivolous.

C. *Responses to the Allegations of Frivolous Filing*

In response to the allegations of frivolous filing as to both Complaints, Complainant reasserts her allegations and argues that the Complaints were filed as “a good faith challenge to Respondent’s use of DCPP threats to enforce administrative timelines.” Moreover, Complainant notes that her Complaints were based on written notice sent by Respondent and Respondent admits to and acknowledges the “documented communication,” and therefore, that “establishes a sufficient basis to preclude the finding of frivolousness.”

III. Analysis

This matter is before the Commission for a determination of probable cause pursuant to *N.J.A.C. 6A:28-9.7*. A finding of probable cause is not an adjudication on the merits but, rather, an initial review whereupon the Commission makes a preliminary determination as to whether the matter should proceed to an adjudication on the merits, or whether further review is not warranted. Pursuant to *N.J.A.C. 6A:28-9.7(a)*, probable cause “shall be found when the facts and circumstances presented in the complaint and written statement would lead a reasonable person to believe that the Act has been violated.”

Jurisdiction of the Commission

In reviewing the allegations in this matter, the Commission notes that its authority is limited to enforcing the Act, *N.J.S.A. 18A:12-21 et seq.*, a set of minimum ethical standards by which all school officials must abide. In this regard, the Commission has jurisdiction only over matters arising under the Act, and it may not receive, hear, or consider any matter that does not arise under the Act, *N.J.A.C. 6A:28-1.4(a)*.

With the jurisdiction of the Commission in mind, to the extent that Complainant seeks a determination from the Commission that Respondent may have violated any regulations or statutes involving referrals to DCPD, the Commission advises that such determinations fall beyond the scope, authority, and jurisdiction of the Commission. Although Complainant may be able to pursue a cause of action(s) in the appropriate tribunal, the Commission is not the appropriate entity to adjudicate those claims. Accordingly, those claims are dismissed.

Alleged Violations of the Act

Complainant submits that, based on the conduct more fully detailed above, Respondent violated *N.J.S.A. 18A:12-24(a)*, *N.J.S.A. 18A:12-24(b)*, *N.J.S.A. 18A:12-24(c)*, *N.J.S.A. 18A:12-24(d)* and *N.J.S.A. 18A:12-24(f)*, and these provisions of the Act state:

- a. No school official or member of his immediate family shall have an interest in a business organization or engage in any business, transaction, or professional activity, which is in substantial conflict with the proper discharge of his duties in the public interest;
- b. No school official shall use or attempt to use his official position to secure unwarranted privileges, advantages or employment for himself, members of his immediate family or others;
- c. No school official shall act in his official capacity in any matter where he, a member of his immediate family, or a business organization in which he has an interest, has a direct or indirect financial involvement that might reasonably be expected to impair his objectivity or independence of judgment. No school official shall act in his official capacity in any matter where he or a

member of his immediate family has a personal involvement that is or creates some benefit to the school official or member of his immediate family;

d. No school official shall undertake any employment or service, whether compensated or not, which might reasonably be expected to prejudice his independence of judgment in the exercise of his official duties;

f. No school official shall use, or allow to be used, his public office or employment, or any information, not generally available to the members of the public, which he receives or acquires in the course of and by reason of his office or employment, for the purpose of securing financial gain for himself, any member of his immediate family, or any business organization with which he is associated;

To credit a violation of *N.J.S.A. 18A:12-24(a)*, Complainant must provide sufficient factual evidence that Respondent, or a member of her immediate family, has an interest in a business organization, or engaged in any business, transaction, or professional activity which was in substantial conflict with the proper discharge of her duties in the public interest.

In order to credit a violation of *N.J.S.A. 18A:12-24(b)*, Complainant must provide sufficient factual evidence that Respondent used or attempted to use her official position to secure an unwarranted privilege, advantage or employment for herself, members of her immediate family, or “others.”

To credit a violation of *N.J.S.A. 18A:12-24(c)*, Complainant must provide sufficient factual evidence that Respondent acted in her official capacity in a matter where she, or a member of her immediate family, had a direct or indirect financial involvement that might reasonably be expected to impair her objectivity, or in a matter where she had a personal involvement that created some benefit to her, or to a member of her immediate family.

In order to credit a violation of *N.J.S.A. 18A:12-24(d)*, Complainant must provide sufficient factual evidence that Respondent engaged in employment or service, regardless of whether compensated, which might reasonably be expected to prejudice her independence of judgment in the exercise of her official duties.

To credit a violation of *N.J.S.A. 18A:12-24(f)*, Complainant must provide sufficient factual evidence that Respondent used her public employment, or any information not generally available to the public, and which she received in the course of and by reason of her employment, for the purpose of securing financial gain for herself, her business organization, or a member of her immediate family.

After review, the Commission finds that there are insufficient facts and circumstances presented in the Complaints and the Written Statements to lead a reasonable person to believe that *N.J.S.A. 18A:12-24(a)*, *N.J.S.A. 18A:12-24(b)*, *N.J.S.A. 18A:12-24(c)*, *N.J.S.A. 18A:12-24(d)* and *N.J.S.A. 18A:12-24(f)* were violated. As for a potential violation of *N.J.S.A. 18A:12-24(a)*, Complainant has not provided any evidence that Respondent, or a member of her

immediate family, has an interest in a business organization, or engaged in any business, transaction, or professional activity which was in substantial conflict with the proper discharge of her duties in the public interest as a Superintendent. Regarding a violation of *N.J.S.A.* 18A:12-24(b), Complainant has not shown how a Board policy, or Respondent referencing a Board or District policy, constitutes Respondent using or attempting to use her official position to secure an unwarranted privilege, advantage or employment for herself, members of her immediate family, or “others.” With regard to a violation of *N.J.S.A.* 18A:12-24(c), Complainant has not demonstrated how an email sent by Respondent would constitute Respondent, as Superintendent, acting in her official capacity in any matter where she, a member of her immediate family, or a business organization in which she has an interest, has a direct or indirect financial involvement that might reasonably be expected to impair her objectivity or independence of judgment, as it is unclear from the Complaint what financial or personal involvement Respondent would have with respect to a possible DCPD referral. Regarding a violation of *N.J.S.A.* 18A:12-24(d), Complainant has not shown how Respondent has undertaken any outside employment or service. Finally, Complainant has not provided evidence that Respondent used, or allowed to be used, her public office or employment, or any information, not generally available to the members of the public, which she receives or acquires in the course of and by reason of her office or employment, for the purpose of securing financial gain for herself, any member of her immediate family, or any business organization with which she is associated as required by *N.J.S.A.* 18A:12-24(f).

Therefore, and pursuant to *N.J.A.C.* 6A:28-9.7(b), the Commission dismisses the alleged violations of *N.J.S.A.* 18A:12-24(a), *N.J.S.A.* 18A:12-24(b), *N.J.S.A.* 18A:12-24(c), *N.J.S.A.* 18A:12-24(d) and *N.J.S.A.* 18A:12-24(f).

IV. Request for Sanctions

At its meeting on May 26, 2026, the Commission considered Respondent’s requests that the Commission find the Complaints frivolous, and impose sanctions pursuant to *N.J.S.A.* 18A:12-29(e). Despite Respondent’s arguments, the Commission cannot find evidence that might show that Complainant filed the Complaints in bad faith or solely for the purpose of harassment, delay, or malicious injury. The Commission also does not have information to suggest that Complainant knew or should have known that the Complaints were without any reasonable basis in law or equity, or that they could not be supported by a good faith argument for an extension, modification or reversal of existing law. *N.J.A.C.* 6A:28-1.2. Therefore, at its meeting on June 23, 2026, the Commission adopted a decision finding the Complaints not frivolous, and denying the requests for sanctions.

V. Decision

In accordance with *N.J.S.A.* 18A:12-29(b), and for the reasons detailed herein, the Commission hereby notifies Complainant and Respondent that there are insufficient facts and circumstances pled in the Complaints and in the Written Statements to lead a reasonable person to believe that the Act was violated as alleged in the Consolidated Complaint and, consequently, dismisses the above-captioned consolidated matter. *N.J.A.C.* 6A:28-9.7(b). The Commission

further advises the parties that, following its review, it voted to find that the Consolidated Complaint is not frivolous, and to deny Respondent's request for sanctions.

The within decision is a final decision of an administrative agency and, therefore, it is appealable only to the Superior Court-Appellate Division. *See, New Jersey Court Rule 2:2-3(a)*. Under *New Jersey Court Rule 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.

Robert W. Bender, Chairperson

Mailing Date: June 23, 2026

***Resolution Adopting Decision
in Connection with C05-26 and C27-26 (Consolidated)***

Whereas, at its meeting on May 26, 2026, the School Ethics Commission (Commission) considered the Complaints and the Written Statements submitted in connection with the above-referenced consolidated matter; and

Whereas, at its meeting on May 26, 2026, the Commission discussed finding that the facts and circumstances presented in the Complaints and the Written Statements would not lead a reasonable person to believe that the Act was violated, and therefore, dismissing the above-captioned consolidated matter; and

Whereas, at its meeting on May 26, 2026, the Commission discussed finding the Complaints not frivolous, and denying the requests for sanctions; and

Whereas, at its meeting on June 23, 2026, the Commission reviewed and voted to approve the within decision as accurately memorializing its actions/findings from its meeting on May 26, 2026; 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 public meeting on June 23, 2026.

Brigid C. Martens, Director
School Ethics Commission