

Before the School Ethics Commission
Docket No.: C103-25
Decision on Probable Cause

Dr. Malcolm X. Outlaw,
Complainant

v.

Dr. Steven Lewis,
Willingboro Board of Education, Burlington County,
Respondent

I. Procedural History

The above-captioned matter arises from a Complaint that was filed with the School Ethics Commission (Commission) on October 29, 2025¹ by Dr. Malcolm X. Outlaw (Complainant), Superintendent of the Willingboro School District (District), alleging that Dr. Steven Lewis (Respondent), Business Administrator/Board Secretary (BA/BS) of the Willingboro 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:12-24(b)* and *N.J.S.A. 18A:12-24(c)*. Respondent filed a Written Statement on December 10, 2025.

The parties were notified by correspondence dated March 17, 2026, that the above-captioned matter would be discussed by the Commission at its meeting on March 24, 2026, to determine whether probable cause exists. Following its discussion on March 24, 2026, the Commission adopted a decision at its meeting on April 28, 2026, finding that the Commission does not have jurisdiction over the allegations in Count 2, and finding there are insufficient facts and circumstances pled in the Complaint and in the Written Statement to lead a reasonable person to believe that the Act was violated as alleged in Counts 1 and 3 in the remainder of the Complaint.

II. Summary of the Pleadings

A. The Complaint

In Count 1, Complainant maintains that on or about March 27, 2025, Respondent “directed” the high school print shop teacher to “produce promotional materials for Respondent’s private business using [D]istrict equipment, materials, and staff time.” Per Complainant, the print shop made business cards and flyers for Respondent’s private business without “authorization” from Complainant or the Board and without payment. Complainant further maintains it was not until Complainant informed the Board on July 2, 2025, that Respondent paid the Accounting Supervisor. Complainant alleges

¹ On October 13, 2025, Complainant filed a deficient Complaint; however, on October 29, 2025, 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*.

Respondent violated *N.J.S.A.* 18A:12-24(b), because he “used his official position and access to [D]istrict facilities and personnel to secure the use of public property – printing services – for his private business” and violated *N.J.S.A.* 18A:12-24(c), because he “secured an unwarranted privilege/advantage – [D]istrict printing services for a private business – without Superintendent or Board authorization and without timely payment, a benefit not afforded to the public.”

In Count 2, Complainant provides that Respondent was placed on administrative leave on June 26, 2025, “with a clear written directive to refrain from contacting staff/[B]oard members, performing work-related duties, or accessing [D]istrict systems/records.” However, despite the directive, Complainant contends Respondent contacted staff and directed them to clean out his office in violation of *N.J.S.A.* 18A:12-24(b), because he “leveraged his official role to cause staff to act for his benefit while on leave” and *N.J.S.A.* 18A:12-24(c), because he “used the influence of his position to direct staff to take actions for his private interest.”

In Count 3, Complainant notes that Respondent’s conduct from March 27-July 30, 2025, “shows repeated use of [D]istrict resources or positional influence for personal purposes” in violation of *N.J.S.A.* 18A:12-24(b), because he used his position to secure private benefits and *N.J.S.A.* 18A:12-24(c), because he “secured unwarranted advantages more than once – printing services and staff action – through his official capacity.”

B. Written Statement

As to Counts 1 and 3, Respondent argues the Complaint does not allege that “ordering private business cards from the print shop would have been inappropriate had Respondent paid for them in a timely manner.” According to Respondent, the print shop “offers students the opportunity to simulate the operation of a commercial printing facility,” and therefore, “accepts printing orders from individuals and organizations and charges for its services.” Respondent admits that he owns a consulting business and co-owns a bounce house business, and in March 2025, “he placed an order with the print shop for cards for both businesses, fully intending to pay for this service,” but the print shop did not send an invoice until July 7, 2025. Respondent asserts he paid the invoice, even though the order was not completed, and was still not fulfilled as of the filing of the Written Statement.

Regarding Count 2, Respondent argues again, Complainant has not provided any evidence to support these allegations, and Respondent has submitted the “written communication between him and the Director of Human Resources which speaks for itself.” Respondent maintains after he was placed on administrative leave on June 23, he emailed the Director of Human Resources on June 7 “requesting a time to retrieve his personal belongings.” Respondent maintains the Director told him that she would get back to him with a date and time, but he was reinstated to his position the following day, so there was no need to do so.

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 Board or Human Resources policies, 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. The allegations in Count 2 – that Respondent contacted the Human Resources director to retrieve his belongings when on administrative leave despite being given a directive not to contact staff or Board members – is a Human Resources issue and falls strictly under Board policy. As this allegation does not fall within the purview of the School Ethics Act, Count 2 is dismissed for lack of jurisdiction by the Commission.

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(b)* and *N.J.S.A. 18A:12-24(c)*, and these provisions of the Act state:

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;

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 his official position to secure an unwarranted privilege, advantage or employment for himself, members of his 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 his official capacity in a matter where he, or a member of his immediate family, had a direct or indirect financial involvement that might reasonably be expected to impair his objectivity, or in a matter where he had a personal involvement that created some benefit to him, or to a member of his immediate family.

Following its assessment, the Commission finds that there are insufficient facts and circumstances presented in the Complaint and the Written Statement to lead a reasonable person to believe that *N.J.S.A.* 18A:12-24(b) and *N.J.S.A.* 18A:12-24(c) were violated. As to a violation of *N.J.S.A.* 18A:12-24(b), Complainant has not established that Respondent used his official position to secure an unwarranted privilege or advantage when he utilized the high school print shop for business cards and/or flyers for his businesses. Whether the print shop permits printing services for individuals or organizations and whether payment is due before or after services are rendered, are matters of Board policy, and evidence regarding such policies have not been offered by Complainant. As such, Complainant has not provided any evidence that Respondent was afforded any privileges that are not otherwise offered to other members of the staff or the community. Additionally, it is undisputed that Respondent ultimately paid for the printing services. Regarding a violation of *N.J.S.A.* 18A:12-24(c), while Respondent has a direct financial involvement in his own businesses, Complainant has not provided evidence that Respondent took any action in his official capacity or that use of the print shop might reasonably be expected to impair his objectivity or create a benefit for him as he paid for the services upon receipt of an invoice. Therefore, and pursuant to *N.J.A.C.* 6A:28-9.7(b), the Commission dismisses the alleged violation(s) of *N.J.S.A.* 18A:12-24(b) and *N.J.S.A.* 18A:12-24(c).

IV. 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 the Commission does not have jurisdiction over the allegations in Count 2, and finding there are insufficient facts and circumstances pled in the Complaint and in the Written Statement to lead a reasonable person to believe that the Act was violated as alleged in Counts 1 and 3 in the remainder of the Complaint and, consequently, dismisses the above-captioned matter. *N.J.A.C.* 6A:28-9.7(b).

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: April 28, 2026

***Resolution Adopting Decision
in Connection with C103-25***

Whereas, at its meeting on March 24, 2026, the School Ethics Commission (Commission) considered the Complaint and the Written Statement submitted in connection with the above-referenced matter; and

Whereas, at its meeting on March 24, 2026, the Commission discussed finding that the Commission does not have jurisdiction over the allegations Count 2 and the facts and circumstances presented in the Complaint and the Written Statement would not lead a reasonable person to believe that the Act was violated in Counts 1 and 3 in the remainder of the Complaint, and therefore, dismissing the above-captioned matter; and

Whereas, at its meeting on April 28, 2026, the Commission reviewed and voted to approve the within decision as accurately memorializing its actions/findings from its meeting on March 24, 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 April 28, 2026.

Brigid C. Martens, Director
School Ethics Commission