

Before the School Ethics Commission
Docket No.: C142-25
Decision on Probable Cause

Azim Gray,
Complainant

v.

Cameron Cox,
Plainfield Board of Education, Union County,
Respondent

I. Procedural History

The above-captioned matter arises from a Complaint that was filed with the School Ethics Commission (Commission) on February 14, 2026,¹ by Azim Gray (Complainant), alleging that Cameron Cox (Respondent), a member of the Plainfield 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(a), *N.J.S.A.* 18A:12-24(b) and *N.J.S.A.* 18A:12-24(e). On April 1, 2026, Respondent filed a Written Statement.

The parties were notified by correspondence dated May 19, 2026, that the above-captioned matter would be discussed by the Commission at its meeting on May 26, 2026, to determine whether probable cause exists. Following its discussion on May 26, 2026, the Commission adopted a decision at its meeting on June 23, 2026, finding the Commission does not have jurisdiction over the allegations in the Complaint as they do not arise under the Act, and administratively dismissing the above-captioned matter in accordance with its authority as set forth in *N.J.A.C.* 6A:28-9.2(a)(1).

II. Summary of the Pleadings

A. *The Complaint*

According to Complainant, the school conducted a financial audit for the fiscal year (FY) 2024-2025, which ultimately identified two “financially material deficiencies with retroactive and future fiscal year impact[,]” namely, “[m]ultiple [New Jersey Board of Public Utilities (NJBPU)] [] grant revenue were not recorded against the proper fund” and “[p]rincipal and interest repayment obligations for Energy Savings Improvement Bonds (ESIP) issued by the

¹ On January 5, 2026, Complainant filed a deficient Complaint; however, on February 14, 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.

school district were not budgeted for and/or reported in the proper fund.” Complainant maintains these “deficiencies noted implicate systemic weakness in core financial management responsibilities – fund accounting, budgeting discipline, and internal controls requiring correcting and preventative actions to ensure full remediation.” However, Complainant notes corrective steps have not been taken.

Complainant contends:

- In December 2025, Respondent “failed to provide the required information and documentation requiring McKinney-Vento funding allocations, compliance measures, and implementation, despite direct requests to support Board oversight and committee review,” which “impeded the Board[’s] ability to assess compliance with statutory obligations relating to the education of homeless students and proper use of restricted funds.”

- During FY June 2024-June 2025, the District received grant money from the NJBPU, which was funded through federal American Rescue Plan funds (ARP/ESSER) through the State. Complainant maintains these funds are subject to specific federal and state accounting, reporting, and transparency requirements. Despite this, the District charged all related expenditures to the General Fund, capital outlay and construction services budget lines. Complainant further maintains these “accounting treatments obscured the federal grant origin of the funds and delayed meaningful Board and public oversight of ESSER expenditures.”

- During FY 2025, the District issued ESIP bonds that were “incorrectly recorded in the Debt Service Fund rather than the General Fund, contrary to the [New Jersey Department of Education (NJDOE)] Uniform Chart of Accounts requirements.” Despite the “material misstatements and misclassifications,” Complainant provides that Respondent “represented to the Board and/or others that required ESSER/ARP disclosures and filings were properly completed, when in fact the funds were improperly recorded and inaccurately disclosed.” Complainant further provides that these “misstatements and omissions deferred scrutiny into the handling of federal public funds and impaired the ability of the Board and public to exercise informed oversight.”

With the above in mind, Complainant asserts Respondent violated *N.J.S.A.* 18A:12-24(a) because he “failed to act in a manner consistent with the public interest by allowing or causing material misclassification and nondisclosure of federal ESSER funds, thereby undermining transparency and accountability”; violated *N.J.S.A.* 18A:12-24(b) because he “used or permitted the use of his official position to advance inaccurate financial representations regarding compliance with ARP/ESSER reporting requirements, shielding improper accounting practices from timely review”; and violated *N.J.S.A.* 18A:12-24(e) because his “failure to ensure correct accounting and truthful disclosure of nearly \$5 million in federal funds, resulting in audit findings and misstated fund balances, constitutes conduct that brought discredit upon the” District.

B. *Written Statement*

In his Written Statement, Respondent initially argues “there is no factual or legal basis to find any violations, and therefore, the Complaint should be dismissed.”

More specifically, Respondent argues Complainant fails to allege any facts that support a violation of *N.J.S.A.* 18A:12-24(a). According to Respondent, “Complainant alleges non-compliance with the McKinney-Vento funding allocation and that the alleged non-compliance ‘impeded the Board’s ability to assess compliance’” Respondent notes Complainant further alleges “a pattern of non-responsiveness and obstruction and ‘lack of transparency’” However, Respondent maintains Complainant does not allege that Respondent or any of his family members had an interest in any company that was doing business with the District and that it presented a conflict with Respondent’s duties.

Regarding a violation of *N.J.S.A.* 18A:12-24(b), Respondent asserts Complainant did not allege that Respondent or an immediate family member received some private benefit because of Respondent’s position.

Finally, as to a violation of *N.J.S.A.* 18A:12-24(e), Respondent argues that Complainant’s allegations of misconduct, “are in no way related to” this provision. Per Respondent, Complainant has not demonstrated that Respondent used his official role to “solicit or accept any gift, favor, loan, political contribution, service, promise of future employment, or other thing of value”

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 laws or regulations concerning financial regulations, the Commission advises that such determinations fall beyond the scope, authority, and jurisdiction of the Commission. Additionally, the Commission notes

that it does not have jurisdiction nor does it review complaints, investigations, or decisions involving school audits or failure to correct deficiencies noted in school district audits.

Accordingly, for the above reasons, the Commission finds that it does not have jurisdiction over the allegations in the Complaint as they do not arise under the Act. As the Commission is authorized, in accordance with *N.J.A.C. 6A:28-9.2(a)(1)*, to administratively dismiss a complaint for lack of jurisdiction pursuant to *N.J.A.C. 6A:28-1.4*, the Commission finds that the Complaint should be dismissed.

IV. Decision

Based on the foregoing, and pursuant to its authority as set forth in *N.J.A.C. 6A:28-9.2(a)(1)*, the Commission administratively dismisses the above-captioned matter for lack of jurisdiction pursuant to *N.J.A.C. 6A:28-1.4*.

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 C142-25***

Whereas, at its meeting on May 26, 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 May 26, 2026, the Commission discussed administratively dismissing the above-captioned matter in accordance with its authority as set forth in *N.J.A.C.* 6A:28-9.2(a)(1) due to lack of jurisdiction pursuant to *N.J.A.C.* 6A:28-1.4, as the allegations in the Complaint do not arise under the Act; 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