

Before the School Ethics Commission
OAL Docket No.: EEC-08066-25
SEC Docket No.: C54-24
Final Decision

Terry Maldonado,
Complainant

v.

Vicky Adams,
Pemberton Township 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 July 3, 2024,¹ by Terry Maldonado (Complainant), alleging that Vicky Adams (Respondent), a member of the Pemberton Township Board of Education (Board), violated the School Ethics Act (Act), *N.J.S.A. 18A:12-21 et seq.* More specifically, the Complaint averred that Respondent violated *N.J.S.A. 18A:12-24.1(e)* (Count 2), *N.J.S.A. 18A:12-24.1(g)* (Count 1), and *N.J.S.A. 18A:12-24.1(i)* (Count 2) of the Code of Ethics for School Board Members (Code). Respondent filed a Written Statement on August 28, 2024, and also alleged that the Complaint is frivolous. On September 16, 2024, Complainant filed a response to the allegation of frivolous filing.

At its meeting on April 22, 2025, and after review of the Complaint and the Written Statement, the Commission adopted a decision finding that there were sufficient facts and circumstances pled in the Complaint and in the Written Statement to lead a reasonable person to believe that that *N.J.S.A. 18A:12-24.1(g)* was violated in Count 1 of the Complaint, but insufficient facts and circumstances to lead a reasonable person to believe that *N.J.S.A. 18A:12-24.1(e)* and/or *N.J.S.A. 18A:12-24.1(i)* were violated in Count 2. The Commission also adopted a decision finding the Complaint not frivolous, and denying Respondent's request for sanctions. Based on its finding of probable cause, the Commission voted to transmit the above-captioned matter to the Office of Administrative Law (OAL) for a hearing.

Following a motion for summary decision, the Administrative Law Judge (ALJ) issued an Initial Decision on July 7, 2026, concluding that Respondent did not violate *N.J.S.A. 18A:12-24.1(g)*, and dismissing the matter. Neither party filed exceptions.

¹ On June 24, 2024, Complainant filed a deficient Complaint; however, on July 3, 2024, Complainant filed an Amended Complaint that cured all defects and was deemed compliant with the requirements detailed in *N.J.A.C. 6A:28-6.3*.

At its meeting on August 25, 2026, the Commission discussed the above-captioned matter, and at its meeting on September 22, 2026, the Commission voted to adopt the Initial Decision's findings of fact, the legal conclusion that Respondent did not violate *N.J.S.A.* 18A:12-24.1(g), and the dismissal of the above-captioned matter.

II. Initial Decision

The ALJ noted that the sole remaining Count before her alleged that during a Board meeting on May 9, 2024, the Superintendent provided the Board with a letter from the Director of Special Services (Director), which contained a request for a salary increase. The complaint alleged that in an Individualized Education Program (IEP) meeting that Respondent attended for her grandchild on May 23, 2024, and in a phone call following that meeting, Respondent had a conversation with an unnamed "subordinate" during which Respondent shared confidential information from the letter relating to the Director's request for a salary increase. *Initial Decision* at 2-3.

The ALJ noted that Respondent argued "that no such information was shared, and moreover, the letter from the Director requesting a salary increase was public knowledge." *Id.* at 3. The ALJ stated that the parties "conducted extensive discovery, including interrogatories and depositions." *Ibid.* The ALJ found Complainant did not provide "firsthand knowledge of any such disclosure and did not provide any information about to whom this information was disclosed," nor did Complainant "provide any names in responses to discovery request and indicated that she did not intend to call any witnesses or provide any evidence at the hearing regarding this allegation," as well as stated that she would be the "only witness to testify" at a potential hearing. *Ibid.*

The ALJ found that there is no dispute that Respondent's grandchild was a student in the district and that Respondent attended an IEP meeting regarding her grandchild. *Initial Decision* at 6. The ALJ further found Complainant has not provided any evidence or any witnesses to substantiate the allegation that Respondent revealed any confidential information in this meeting, or at any time after the meeting. *Ibid.* According to the ALJ, Complainant concedes that she does not have any witnesses to corroborate this allegation, and she cannot corroborate herself. *Ibid.* Moreover, the ALJ noted Complainant declined to withdraw the complaint and advised that she would do so only if Respondent resigned from the Board. *Ibid.*

The ALJ stated that Respondent submitted transcripts from a deposition as well as answers to interrogatories which demonstrated that "there is no evidence that any information that was discussed in the IEP meeting or during a follow-up phone conversation that was privileged or obtained in an executive meeting of the Board." *Ibid.*

The ALJ found Complainant "has not produced or proffered any evidence that any confidential information was disclosed in this case." *Ibid.* Accordingly, the ALJ also found there is no evidence that *N.J.S.A.* 18A:12-24.1(g) was violated or that a hearing could demonstrate any such violation. *Ibid.* Further, the ALJ noted Complainant does not have personal knowledge nor

any witnesses or evidence to demonstrate such a violation. *Ibid.* Therefore, the ALJ concluded there are no issues of fact in dispute and there is no evidence of any such violation. *Ibid.*

Accordingly, the ALJ granted summary decision in favor of Respondent, and dismissed the Complaint in its entirety.

IV. Analysis

Upon a thorough, careful, and independent review of the record, the Commission adopts the ALJ's factual findings, the legal conclusions that Respondent did not violate *N.J.S.A.* 18A:12-24.1(g) and the dismissal of this matter.

N.J.S.A. 18A:12-24.1(g) requires that a board member will hold confidential all matters pertaining to the schools which, if disclosed, would needlessly injure individuals or the schools. Pursuant to *N.J.A.C.* 6A:28-6.4(a), factual evidence of a violation of *N.J.S.A.* 18A:12-24.1(g) would include evidence that Respondent took action to make public, reveal or disclose information that was not public under any laws, regulations or court orders of this State, or information that was otherwise confidential in accordance with board policies, procedures or practices.

The Commission finds that, as it has not been established that Respondent shared any confidential information, Complainant has not demonstrated that Respondent took any action to make public, reveal or disclose information that was not public under any laws, regulations or court orders of this State, or information that was otherwise confidential in accordance with board policies, procedures or practices. As such, a violation of *N.J.S.A.* 18A:12-24.1(g) has not been established.

Therefore, the Commission finds that this matter should be dismissed.

IV. Decision

Upon review, the Commission adopts the Initial Decision's findings of fact, the legal conclusion that Respondent did not violate *N.J.S.A.* 18A:12-24.1(g), and the dismissal of the above-captioned matter.

Therefore, this is a final agency decision and is appealable only to the Superior Court-Appellate Division. *See, N.J.A.C.* 6A:28-9.10(b) and *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.

Dennis M. Roberts, Chairperson

Mailing Date: September 22, 2026

***Resolution Adopting Decision
in Connection with C54-24***

Whereas, at its meeting on April 22, 2025, the School Ethics Commission (Commission) voted to transmit the above-captioned matter to the Office of Administrative Law (OAL) for a hearing; and

Whereas, the Administrative Law Judge (ALJ) issued an Initial Decision dated July 7, 2026; and

Whereas, in the Initial Decision, the ALJ found that Respondent did not violate *N.J.S.A.* 18A:12-24.1(g), and ordered the dismissal of the above-captioned matter; and

Whereas, neither party filed exceptions to the Initial Decision; and

Whereas, at its meeting on August 25, 2026, the Commission reviewed and discussed the record, including the ALJ's Initial Decision; and

Whereas, at its meeting on August 25, 2026, the Commission discussed adopting the Initial Decision's findings of fact, the legal conclusion that Respondent did not violate *N.J.S.A.* 18A:12-24.1(g), and the dismissal of the above-captioned matter; and

Whereas, at its meeting on September 22, 2026, the Commission reviewed and voted to approve the within decision as accurately memorializing its actions/findings from its meeting on August 25, 2026; and

Now Therefore Be It Resolved, the Commission hereby adopts the within decision.

Dennis M. Roberts, Chairperson

I hereby certify that this Resolution was duly
adopted by the School Ethics Commission
at its meeting on September 22, 2026.

Brigid C. Martens, Director
School Ethics Commission