

Before the School Ethics Commission
Docket No.: C55-25
Decision on Probable Cause

Matthew and Crystal Chierici,
Complainants

v.

Christine Trampe, Lori Kroeger, Stephanie DiAntonio, Michele Leach, Amy Gregg,
Erica Atkinson, Howard “Butch” Bruner, William Wilkinson, Tyler Grant
and Shawnequa Carvalho,
Mantua Township Board of Education, Gloucester County,
Respondents

I. Procedural History

The above-captioned matter arises from a Complaint that was filed with the School Ethics Commission (Commission) on June 7, 2025, by Matthew and Crystal Chierici (Complainants), alleging that Christine Trampe (Respondent Trampe), Superintendent of the Mantua Township School District, as well as members of the Mantua Township Board of Education (Board), namely Lori Kroeger, Stephanie DiAntonio, Michele Leach, Amy Gregg, Erica Atkinson, Howard “Butch” Bruner, William Wilkinson, Tyler Grant and Shawnequa Carvalho (Board member Respondents), violated the School Ethics Act (Act), *N.J.S.A.* 18A:12-21 *et seq.* More specifically, the Complaint avers that Respondent Trampe violated *N.J.S.A.* 18A:12-24(a) and *N.J.S.A.* 18A:12-24(b), and the Board member Respondents violated *N.J.S.A.* 18A:12-24.1(a)¹ of the Code of Ethics for School Board Members (Code). On June 30, 2025, the Board member Respondents filed a Written Statement, and Respondent Trampe filed a separate Written Statement on July 21, 2025.

The parties were notified by correspondence dated January 20, 2026, that the above-captioned matter would be discussed by the Commission at its meeting on January 27, 2026, in order to make a determination regarding probable cause. Following its discussion on January 27, 2026, the Commission adopted a decision at its meeting on February 24, 2026, finding that there are insufficient facts and circumstances pled in the Complaint and in the Written Statements to lead a reasonable person to believe that the Act was violated as alleged in the Complaint.

¹ While Complainants cited *N.J.S.A.* 18A:12-24(a), they used the language of *N.J.S.A.* 18A:12-24.1(a). Accordingly, the Commission will review this as an allegation of *N.J.S.A.* 18A:12-24.1(a).

II. Summary of the Pleadings

A. The Complaint

By way of background, Complainants state that their child was involved in an “incident” and was consequently banned from participating in the “Sixth Grade Promotion Ceremony.” As a result, Complainants met with Respondent Trampe (Superintendent) on April 15, 2025, to discuss the “disciplinary consequences” and appeal the ban. Ultimately, on April 17, 2025, Complainants received notice via email that Respondent Trampe denied the appeal. According to Complainants, the other student involved in the “incident” with their child “is a relative of” the Superintendent, and therefore, Complainants maintain Respondent Trampe should have recused herself from the matter.

With the above in mind and in Count 1, Complainants assert that Respondent Trampe violated *N.J.S.A. 18A:12-24(a)* and *N.J.S.A. 18A:12-24(b)*, because she is a relative of the other student who was involved in the incident, which resulted in disciplinary consequences for Complainants’ child. Complainants further assert her “implicit bias of the situation” and “lack of forthrightness . . . raises concerns of impartiality and misuse of power.”

In Count 2, Complainants maintain that as a result of Respondent Trampe’s actions, they filed an ethics complaint with the Board on May 1, 2025. Thereafter, Complainants followed up twice; however, Complainants assert the Board ignored their ethics complaint and did not address the matter. Complainants contend the Board member Respondents violated *N.J.S.A. 18A:12-24.1(a)*, because they ignored a complaint filed against the Superintendent, and therefore, did not “uphold and enforce all laws, rules and regulations of the State Board of Education, and court orders pertaining to schools.”

B. Written Statements

In Respondent Trampe’s Written Statement, she explains that the incident involving Complainants’ child was serious, and thereafter, the principal suspended the child for 10 days, which carries “disciplinary points,” and resulted in Complainants’ child becoming ineligible for, among other things, the sixth grade promotion ceremony. Thereafter, Complainants requested a meeting with Respondent Trampe to discuss the promotion ceremony. Respondent Trampe maintains that Complainants “confirmed that they were not appealing the suspension, nor contesting that their [child]” was involved in an incident. However, Complainants requested “leniency” and “permission” for their child to attend the promotion ceremony. Respondent Trampe notified Complainants, in writing, that she was “upholding all the disciplinary consequences,” but advised Complainants that they could appeal the decision to the Board, which they did. According to Respondent Trampe, it was at this time that Complainants alleged Respondent Trampe had a conflict due to being related to the other student. However, Respondent Trampe asserts that “no familial relationship exists” as to her deceased brother’s wife’s cousin’s child.

As to a violation of *N.J.S.A. 18A:12-24(a)*, Respondent Trampe argues Complainants fail “to allege any business organization or outside professional activity [she] has engaged in that presents any conflict with her duties as superintendent.” Respondent further argues she was “performing work within the scope of her duties” as the Superintendent. Regarding a violation of *N.J.S.A.*

18A:12-24(b), Respondent maintains as an “other,” Complainants have not shown how Respondent provided an “any unwarranted privilege” to the student who was assaulted. Respondent provides that the school’s Code of Conduct “clearly articulate[s]” the consequences for certain actions, and “it is absurd to suggest that after being the victim of an unprovoked assault,” the student received “a benefit” from Complainants’ child being suspended.

In the Board member Respondents’ Written Statement, they argue that contrary to Complainants claims that they did not respond, the Board member Respondents note they did contact Complainants with their decision to uphold the disciplinary action. According to the Board member Respondents, “Complainants fail to recognize that the proper forum for adjudicating an ‘ethics complaint’ is not an appeal to a board of education.” Moreover, Respondents maintain that the Board is “obligated to maintain the confidentiality of all personnel information, including personnel information involving the superintendent.”

As to a violation of *N.J.S.A.* 18A:12-24.1(a), Respondents argue Complainants have “not provided any evidence of a final decision from any court or agency, demonstrating that the Respondent Board [m]embers have failed to enforce any law, rule or regulation, or that changes were brought about through illegal or unethical procedures.” Moreover, “any internal personnel action contemplated by the Board, as a whole, would be required to remain confidential, and could not be disclosed to” Complainants.

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.”

Alleged Violations of the Act

Complainants submit that, based on the conduct more fully detailed above, Respondent Trampe violated *N.J.S.A.* 18A:12-24(a) and *N.J.S.A.* 18A:12-24(b), 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.

Complainants further submit that the Board member Respondents violated *N.J.S.A.* 18A:12-24.1(a), and this provision of the Code provides:

a. I will uphold and enforce all laws, rules and regulations of the State Board of Education, and court orders pertaining to schools. Desired changes shall be brought about only through legal and ethical procedures.

***Respondent Trampe
(Count 1)***

In Count 1, Complainants assert Respondent Trampe violated *N.J.S.A.* 18A:12-24(a) and *N.J.S.A.* 18A:12-24(b) when she was involved in the disciplinary consequences for Complainants' child because she is a relative of the other student who was involved in the incident, which demonstrates an "implicit bias." Respondent Trampe counters that "no familial relationship exists" with the child and the school's code of conduct dictates what disciplinary consequences are imposed.

To credit a violation of *N.J.S.A.* 18A:12-24(a), Complainants 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), Complainants 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."

After review, 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(a) and/or *N.J.S.A.* 18A:12-24(b) were violated. Complainants have not set forth any facts demonstrating that Respondent Trampe has an interest in a business organization, or engaged in any business, transaction or professional activity which is in substantial conflict with her duties as Superintendent, as required by *N.J.S.A.* 18A:12-24(a). As to *N.J.S.A.* 18A:12-24(b), it appears that the principal, and not Respondent Trampe, imposed the 10-day suspension on Complainants' child and determined the child's ineligibility for the sixth grade promotion ceremony, and Respondent Trampe only met with Complainants regarding the promotion ceremony after they requested a meeting. Even if Respondent Trampe was involved, Complainants have not demonstrated how Respondent Trampe's distant relationship with the alleged victim resulted in any sort of unwarranted privilege or advantage to the victim resulting from Complainants' child's code of conduct violation. 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(a) and *N.J.S.A.* 18A:12-24(b) as to Respondent Trampe.

**Board member Respondents
(Count 2)**

In Count 2, Complainants assert that the Board member Respondents violated *N.J.S.A.* 18A:12-24.1(a) when they failed to respond to their ethics complaint against Respondent Trampe. The Board member Respondents contend that they informed Complainants regarding their decision on the disciplinary action, and that the Board is not the appropriate entity to review an ethics complaint.

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(a) shall include a copy of a final decision from any court of law or administrative agency of this State demonstrating that Respondents failed to enforce all laws, rules and regulations of the State Board of Education, and/or court orders pertaining to schools or that Respondents brought about changes through illegal or unethical procedures.

Based on its review, 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:12-24.1(a) was violated. Despite being required by *N.J.A.C.* 6A:28-6.4(a)(1), the Commission finds that Complainants have not provided a copy of a final decision from any court of law or other administrative agency demonstrating or specifically finding that the Board member Respondents violated a specific law, rule, or regulation of the State Board of Education and/or court orders pertaining to schools, or that they brought about changes through illegal or unethical procedures, when they did not respond regarding Complainants' ethics complaint. Without the required final decision(s), a violation of *N.J.S.A.* 18A:12-24.1(a) is not supported. Consequently, and pursuant to *N.J.A.C.* 6A:28-9.7(b), the Commission dismisses the alleged violation of *N.J.S.A.* 18A:12-24.1(a) as to the Board member Respondents.

IV. Decision

In accordance with *N.J.S.A.* 18A:12-29(b), and for the reasons detailed herein, the Commission hereby notifies Complainants and Respondents that there are insufficient facts and circumstances pled in the Complaint and in the Written Statements to lead a reasonable person to believe that the Act was violated as alleged in 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: February 24, 2026

***Resolution Adopting Decision
in Connection with C55-24***

Whereas, at its meeting on January 27, 2026, the School Ethics Commission (Commission) considered the Complaint and the Written Statements submitted in connection with the above-referenced matter; and

Whereas, at its meeting on January 27, 2026, the Commission discussed finding that the facts and circumstances presented in the Complaint and the Written Statements would not lead a reasonable person to believe that the Act was violated, and therefore, dismissing the above-captioned matter; and

Whereas, at its meeting on February 24, 2026, the Commission reviewed and voted to approve the within decision as accurately memorializing its actions/findings from its meeting on January 27, 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 February 24, 2026.

Brigid C. Martens, Director
School Ethics Commission