

***Before the School Ethics Commission***  
***Docket No.: C58-25***  
***Decision on Probable Cause***

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**Stephanie Bolen,**  
***Complainant***

v.

**Mary Renaud,**  
**Allamuchy Board of Education, Warren County,**  
***Respondent***

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**I. Procedural History**

The above-captioned matter arises from a Complaint that was filed with the School Ethics Commission (Commission) on June 12, 2025, by Stephanie Bolen (Complainant), alleging that Mary Renaud (Respondent), a member of the Allamuchy 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:12-24.1(e)* and *N.J.S.A. 18A:12-24.1(i)*<sup>1</sup> of the Code of Ethics for School Board Members (Code). Respondent filed a Written Statement on July 28, 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 Statement to lead a reasonable person to believe that the Act was violated as alleged in the Complaint.

**II. Summary of the Pleadings**

***A. The Complaint***

According to Complainant, based upon a police report that was filed February 12, 2025, Respondent has been harassing and intimidating the Superintendent, Louis Caruso. Complainant maintains the Superintendent filed the report due to Respondent's "repeated, unwanted communications, including late-night emails, disruptive behavior at public meetings, and targeted accusations that interfered with his ability to perform his professional duties." Per Complainant, Respondent's behavior "escalated over time and created a hostile and intimidating work environment, not only for the Superintendent but for others employed by the district." Complainant maintains that

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<sup>1</sup> Complainant cited *N.J.S.A. 18A:12-24.1(g)*, but used the language of *N.J.S.A. 18A:12-24.1(i)*. Accordingly, the Commission will consider this as an allegation of *N.J.S.A. 18A:12-24.1(i)*.

Respondent “appeared uninvited in the Superintendent’s driveway,” and this “physical intrusion crossed professional and personal lines, creating an environment of fear and intimidation.”

Complainant asserts Respondent violated *N.J.S.A.* 18A:12-24.1(e), because her “actions created public mistrust, disrupted the board operations, and interfered with the Superintendent’s duties, compromising the functioning and reputation of the board.” Complainant further asserts Respondent violated *N.J.S.A.* 18A:12-24.1(i), because Respondent followed the Superintendent home after a late night Board meeting creating “a reasonable perception of intimidation and fear” that “constitutes a failure to support district personnel.”

### ***B. Written Statement***

Respondent states that “rumors swirled around town that [Complainant] no longer lived in town.” According to Respondent, in January 2025 a “resident specifically asked [Respondent] how [Complainant] could be on the Board and working on choosing a new Superintendent for the District when she no longer lived in the District.” Respondent contends that on the evening of February 10, 2025, after a Special Board meeting “that was part of the process for choosing a permanent Superintendent,” Respondent “noticed” that Complainant was not heading in the direction of her home. Notably, as to Complainant’s assertion that Respondent followed the Superintendent to his home, Respondent provides the Superintendent was not at that meeting on February 10, because he was the Interim Superintendent and he was applying for the open position of Superintendent. The February 10, 2025, Special meeting consisted of first round interviews, and Mr. Caruso was a candidate whose interview was February 11. It would have been a conflict for him, as Interim Superintendent, to be in attendance at a meeting where candidates were being interviewed for a position for which he was also applying. Moreover, Respondent notes that Complainant’s “false claim is unsupported by the police report filed by Mr. Caruso which states that Respondent ‘showed up unannounced’ at his residence—not that he was followed or ‘tailed’ as [Complainant] claims.” Respondent notes she followed Complainant (not Mr. Caruso), and it was not until she did a Google search that she “discovered” it was Mr. Caruso’s home. Respondent further notes that Mr. Caruso filed the police report on the same day that he was informed he was no longer a candidate for the Superintendent position.

As to a violation of *N.J.S.A.* 18A:12-24.1(e), Respondent argues Complainant did not provide any examples of how Respondent “engaged in a sustained campaign of harassment and intimidation against the district’s (Interim) Superintendent.” Further, Respondent states Complainant has “failed to set forth any factual allegations, which if proven true, suggest that Respondent made any personal promises or took any private action that could have compromised the Board.” Respondent notes that Complainant has not provided any evidence to show that Respondent “made personal promises,” but rather, Complainant “suggests that [Respondent’s] ‘actions created a public mistrust, disrupted Board operations and interfered with the [Interim] Superintendent’s duties.’”

Regarding a violation of *N.J.S.A.* 18A:12-24.1(i), Respondent maintains Complainant has not provided any evidence to demonstrate that Respondent “took any action which harmed school personnel in the proper performance of their duties . . . by providing her opinions about the actions the Interim Superintendent was taking.” Respondent further maintains that the police report “does not reference any type of harassing communications, only the note that [Respondent] appeared at [the Interim Superintendent’s] condominium complex.” Even assuming Respondent was critical of the

Interim Superintendent, she notes she “is permitted to have her own views and taking different positions on issues does not equate to undermining, opposing, compromising, or harming school personnel.”

### **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 criminal laws, including harassment, and/or any Board policies, the Commission advises that such determinations fall beyond the scope, authority, and jurisdiction of the Commission. The Commission also does not have jurisdiction over Human Resources issues such as the creation of a hostile work environment. 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 Respondent violated *N.J.S.A.* 18A:12-24.1(e), and *N.J.S.A.* 18A:12-24.1(i) and these provisions of the Code provide:

- e. I will recognize that authority rests with the board of education and will make no personal promises nor take any private action that may compromise the board.
- i. I will support and protect school personnel in proper performance of their duties.

Pursuant to *N.J.A.C.* 6A:28-6.4(a), a violation(s) of *N.J.S.A.* 18A:12-24.1(e) and *N.J.S.A.* 18A:12-24.1(i) need to be supported by certain factual evidence, more specifically:

5. Factual evidence of a violation of *N.J.S.A.* 18A:12-24.1(e) shall include evidence that Respondent made personal promises or took action beyond the scope of her duties such that, by its nature, had the potential to compromise the board.

9. Factual evidence of a violation of *N.J.S.A.* 18A:12-24.1(i) shall include evidence that Respondent took deliberate action which resulted in undermining, opposing, compromising or harming school personnel in the proper performance of their duties.

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:12-24.1(e) and/or *N.J.S.A.* 18A:12-24.1(i) were violated. While Respondent's behavior of following a Board member to the Interim Superintendent's house is concerning, as noted above, the Commission does not review, nor does it have jurisdiction over complaints of harassment and intimidation. As for a violation of *N.J.S.A.* 18A:12-24.1(e), Complainant does not demonstrate how Respondent made any personal promises or took any private action that could have compromised the Board when she appeared at the Interim Superintendent's residence. Lastly, regarding a violation of *N.J.S.A.* 18A:12-24.1(i), Complainant has not shown how Respondent's actions resulted in undermining, opposing, compromising or harming school personnel in the proper performance of their duties when the alleged actions did not occur while the Interim Superintendent was performing school duties.

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:12-24.1(e) and *N.J.S.A.* 18A:12-24.1(i).

#### **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 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 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.

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Robert W. Bender, Chairperson

Mailing Date: February 24, 2026

***Resolution Adopting Decision  
in Connection with C58-25***

***Whereas***, at its meeting on January 27, 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 January 27, 2026, the Commission discussed finding that 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, 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.

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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.

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Brigid C. Martens, Director  
School Ethics Commission