

Before the School Ethics Commission
Docket No.: C62-25
Decision on Probable Cause

Rosaura Bagolie,
Complainant

v.

Magaly Garnica and Nidia Guerrero,
East Newark Board of Education, Hudson County,
Respondents

I. Procedural History

The above-captioned matter arises from a Complaint that was filed with the School Ethics Commission (Commission) on July 7, 2025,¹ by Rosaura Bagolie (Complainant), alleging that Magaly Garnica (Respondent Garnica) and Nidia Guerrero (Respondent Guerrero) (collectively Respondents), members of the East Newark 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 Respondents Garnica and Guerrero violated *N.J.S.A.* 18A:12-24(b), *N.J.S.A.* 18A:12-24(c) and *N.J.S.A.* 18A:12-24(g), as well as *N.J.S.A.* 18A:12-24.1(c) (Respondent Garnica only), *N.J.S.A.* 18A:12-24.1(d) (Respondents), *N.J.S.A.* 18A:12-24.1(e) (Respondents), *N.J.S.A.* 18A:12-24.1(f) (Respondents), *N.J.S.A.* 18A:12-24.1(i) (Respondents) and *N.J.S.A.* 18A:12-24.1(j) (Respondents) of the Code of Ethics for School Board Members (Code).² Respondents filed a Written Statement on September 12, 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 any allegations stemming from before January 2, 2025, including the entirety of Count 3, were untimely filed, and of the remaining allegations, 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.

¹ On July 1, 2025, Complainant filed a deficient Complaint; however, on July 7, 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.

² Complainant also alleges that Respondents failed and refused to complete the mandatory school ethics training for school board members as required under *N.J.S.A.* 18A:12-33. However, the Commission enforces the training requirement without the need for an additional complaint.

II. Summary of the Pleadings

A. *The Complaint*

By way of background, Complainant, who is both the Principal and Superintendent, alleges that on or about October 4, 2024, Respondent Garnica participated in, and promoted a thread on the website ClassDojo and made public Facebook posts. Complainant maintains in her posts, Respondent Garnica publicly alleged that her child had been abused by a substitute teacher, accused school officials of ignoring alleged abuse involving her child, and alleged that there was a district-wide cover-up. Complainant notes that Respondent Garnica did not follow the required procedures for reporting suspected abuse to the acting school administration, did not notify the acting school administrator, but rather bypassed internal procedures and filed a police report without informing the district and posted on social media. Complainant initiated an Institutional Abuse investigation through the New Jersey Division of Child Protection and Permanency. According to Complainant, the investigation yielded no findings of wrongdoing and cleared the substitute teacher of the allegations. In addition, criminal charges were not initiated against the substitute teacher by the police or the County prosecutor.

At the December 10, 2024, Board meeting, while Complainant was reporting the outcome of the Institutional Abuse investigation during public session, Respondent Garnica publicly accused the Superintendent of “calling students liars.” Complainant notes also on December 10, 2024, Respondent Garnica’s child was officially named a potential aggressor in a Harassment Intimidation and Bullying (HIB) investigation that was filed by another individual, not Complainant. Complainant further notes in retaliation against Complainant for the outcome of the HIB investigation, Respondent Garnica, in coordination with Hector Cancinos, Vice President of the Parent Teacher Organization (PTO) and father of her children, orchestrated and circulated a petition demanding that the district divide the contractually approved dual role of Principal/Superintendent held by Complainant. Complainant maintains the petition was signed by Respondent, her daughter, Board Member Marissa Garnica, Respondent Guerrero, several PTO members, relatives, and friends of Marissa Garnica. Complainant further maintains that although she was aware of the substance of this petition, she did not receive a copy of it until January 2, 2025, and therefore, she did not learn that Respondents Guerrero and Garnica, along with Board member Marissa Garnica, signed the petition until January 2, 2025.

As for Respondent Guerrero, Complainant provides she was previously employed by the Board as a teacher’s assistant. Complainant maintains she recommended Respondent Guerrero for non-renewal from her position. According to Complainant, Respondent Guerrero signed the Petition which was initiated by Respondent Garnica.

With the above in mind, in Count 1, Complainant asserts Respondents Garnica and Guerrero “signed a public petition relevant to [Complainant’s] position as Superintendent” that “proposed taking action to split the Superintendent/Principal position, thus taking adverse employment action against” Complainant in violation of Complainant’s contract and in retaliation for Complainant “truthfully and accurately reporting that Institutional Abuse found no abuse of students had occurred.” Complainant further asserts this action was taken in retaliation for the HIB investigation that was initiated against Respondent Garnica’s child. Complainant

alleges Respondents violated *N.J.S.A. 18A:12-24(g)*, by representing parties other than the Board in a matter before the Board; violated *N.J.S.A. 18A:12-24.1(e)*, because they took private action related to retaliating against the Superintendent, changing the Superintendent's position and violating her contract; violated *N.J.S.A. 18A:12-24.1(i)*, by attempting to change the Superintendent's position and violate her contract; and violated *N.J.S.A. 18A:12-24.1(j)*, by attempting to retaliate against the Superintendent for non-renewing Respondent Guerrero's employment, enforcing the district's HIB policy and accurately reporting that there was not any evidence of abuse.

In Count 2, Complainant reaffirms Respondent Guerrero was terminated by Complainant in June 2022. Complainant contends that through her actions, which include signing the petition to interfere with Complainant's employment in violation of her contract, and by "acting to include self-serving and false statements in [Complainant's] evaluation, Respondent Guerrero has shown a willingness to violate the [Act] and has exhibited animus toward" Complainant. Complainant further contends Respondent Guerrero violated *N.J.S.A. 18A:12-24(b)*, by using her position to secure an advantage over Complainant as a consequence of, and in retaliation for, being terminated; violated *N.J.S.A. 18A:12-24(c)*, by participating in Complainant's evaluation and voting to include improper unethical and false information in that evaluation, and therefore, acting in a matter in which she has an interest that might impair her objectivity; violated *N.J.S.A. 18A:12-24.1(d)*, by attempting to administer the schools; violated *N.J.S.A. 18A:12-24.1(e)*, by taking private action that would compromise the Board; violated *N.J.S.A. 18A:12-24.1(f)*, by using the schools for personal gain; violated *N.J.S.A. 18A:12-24.1(i)*, by failing to support school personnel in the proper performance of their duties; and violated *N.J.S.A. 18A:12-24.1(j)* by failing to refer complaints to the Superintendent.

In Count 3, Complainant maintains that on October 4, 2024, Respondent Garnica publicly and falsely accused a substitute teacher of abusing her child, accused school officials of ignoring the abuse even though she did not report it to the officials, and alleged a district wide cover-up in violation of *N.J.S.A. 18A:12-24(b)*, by using her position to secure an advantage for herself and her child; violated *N.J.S.A. 18A:12-24(c)*, by acting in a matter in which she has an interest that might impair her objectivity; violated *N.J.S.A. 18A:12-24.1(c)*, by failing to confine her actions to policy making and planning; violated *N.J.S.A. 18A:12-24.1(d)*, by attempting to administer the schools; violated *N.J.S.A. 18A:12-24.1(e)*, by taking private that would compromise the Board; violated *N.J.S.A. 18A:12-24.1(f)*, by using the schools for personal gain; violated *N.J.S.A. 18A:12-24.1(i)*, by failing to support school personnel; and violated *N.J.S.A. 18A:12-24.1(j)*, by failing to refer complaints to the Superintendent and acting on a complaint at a public meeting.

B. *Written Statements*

In Respondent Garnica's Written Statement, Respondent Garnica admits that she "participated in a threat on the website ClassDojo and made certain statements on Facebook," admits that she "made certain social media posts concerning the safety of her [child]" and admits that she "made social media posts and filed a police report regarding the incident." Respondent Garnica provides that she "contacted the school as soon as she became aware of the incident from her [child], but was only able to speak to the Secretary, as staff had left for the weekend." Respondent further provides that on October 4, 2024, she commented on ClassDojo in her

capacity as a parent and also spoke to Complainant via telephone. According to Respondent, she filed the police report after she and other parents met with Complainant on October 7, and after Complainant had disclosed the substitute teacher's name so that Respondent could report the substitute to the police. She also admits that Mr. Cancinos (PTO VP and father of Respondent's children), as well as her friends and family, signed a petition but denies that she orchestrated or circulated the petition. As to Count 1 and Count 3, Respondent Garnica denies all allegations that are asserted against her.

In Respondent Guerrero's Written Statement, Respondent Guerrero initially admits that her contract was not renewed; however, she denies that she was fired or terminated. As to Count 1, Respondent Guerrero admits that the petition requested that the Board hire a new Superintendent and that the roles of principal and superintendent be separated. As to the remaining allegations against Respondent Guerrero, she denies all of them and notes they "set forth legal conclusions to which no response is required." Regarding Count 2, Respondent Guerrero restates her previous responses and denies the remaining allegations contained within and leaves Complainant to her proofs.

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 Untimeliness

The Commission's regulations provide a one hundred eighty (180) day limitation period for filing a complaint. More specifically, *N.J.A.C. 6A:28-6.5(a)* provides, in relevant part:

- (a) Complaints shall be filed within 180 days of notice *of the events which form the basis of the alleged violation(s)*. A complainant shall be deemed to be notified of events that form the basis of the alleged violation(s) *when the complainant knew of the events, or when such events were made public so that one using reasonable diligence would know or should have known* (emphasis added).

In this matter, the Complaint was initially filed on July 1, 2025, and includes allegations against Respondent Garnica from October 2024 and December 2024. One hundred and eighty days before the date of filing would be January 2, 2025.

With the above in mind, and pursuant to *N.J.A.C. 6A:28-6.5(a)*, the Commission must determine when Complainant knew of the events which form the basis of the Complaint, or when

such events were made public so that one using reasonable diligence would know, or should have known, of such events.

After review, the Commission finds that there is not a credible basis upon which to find that Complainant was unaware of Respondent Garnica's actions/conduct until the filing date of the Complaint. Complainant should have known of the allegations when they occurred or shortly thereafter as she was the principal/Superintendent at the time. Although the Commission recognizes that the regulatory time period may be relaxed, in its discretion, in any case where strict adherence may be deemed inappropriate or unnecessary or may result in injustice, it does not find extraordinary circumstances in the within matter that would compel relaxation.

Therefore, the Commission finds that the allegations that stem from actions that occurred before January 2, 2025, including the entirety of Count 3, should be dismissed as untimely.

Alleged Violations of the Act

As to the remaining allegations, Complainant submits that, based on the conduct more fully detailed above, Respondent(s) violated *N.J.S.A. 18A:12-24(b)*, *N.J.S.A. 18A:12-24(c)* and *N.J.S.A. 18A:12-24(g)* and these provisions of the Act states:

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;

g. No school official or business organization in which he has an interest shall represent any person or party other than the school board or school district in connection with any cause, proceeding, application or other matter pending before the school district in which he serves or in any proceeding involving the school district in which he serves or, for officers or employees of the New Jersey School Boards Association, any school district. This provision shall not be deemed to prohibit representation within the context of official labor union or similar representational responsibilities;

In order to credit a violation of *N.J.S.A. 18A:12-24(b)*, Complainant must provide sufficient factual evidence that Respondent(s) used or attempted to use their official position to secure an unwarranted privilege, advantage or employment for themselves, members of their 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(s) acted in their official capacity in a matter where they, or a member of their immediate family, had a direct or indirect financial involvement that might reasonably be expected to impair their objectivity, or in a matter where they had a personal involvement that created some benefit to them, or to a member of their immediate family.

To credit a violation of *N.J.S.A. 18A:12-24(g)*, Complainant must provide sufficient factual evidence that Respondent(s) represented any person or party other than the school board or school district in connection with any cause, proceeding, application or other matter pending before the school district in which he serves or in any proceeding involving the school district in which he serves or, for officers or employees of the New Jersey School Boards Association, any school district.

Complainant further submits that Respondent(s) violated *N.J.S.A. 18A:12-24.1(d)*, *N.J.S.A. 18A:12-24.1(e)*, *N.J.S.A. 18A:12-24.1(f)*, *N.J.S.A. 18A:12-24.1(i)* and *N.J.S.A. 18A:12-24.1(j)*, and these provisions of the Code provide:

- d. I will carry out my responsibility, not to administer the schools, but, together with my fellow board members, to see that they are well run.
- 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.
- f. I will refuse to surrender my independent judgment to special interest or partisan political groups or to use the schools for personal gain or for the gain of friends.
- i. I will support and protect school personnel in proper performance of their duties.
- j. I will refer all complaints to the chief administrative officer and will act on the complaints at public meetings only after failure of an administrative solution.

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

- 4. Factual evidence of a violation of *N.J.S.A. 18A:12-24.1(d)* shall include, but not be limited to, evidence that Respondent(s) gave a direct order to school personnel or became directly involved in activities or functions that are the responsibility of school personnel or the day-to-day administration of the school district or charter school.

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

6. Factual evidence of a violation of *N.J.S.A. 18A:12-24.1(f)* shall include evidence that Respondent(s) took action on behalf of, or at the request of, a special interest group or persons organized and voluntarily united in opinion and who adhere to a particular political party or cause; or evidence that Respondent(s) used the schools in order to acquire some benefit for themselves, a member of their immediate family or a friend.

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

10. Factual evidence of a violation of *N.J.S.A. 18A:12-24.1(j)* shall include evidence that Respondent(s) acted on or attempted to resolve a complaint, or conducted an investigation or inquiry related to a complaint (i) prior to referral to the chief administrative officer, or (ii) at a time or place other than a public meeting and prior to the failure of an administrative solution.

Count 1

In Count 1, Complainant asserts Respondents Garnica and Guerrero violated *N.J.S.A. 18A:12-24(g)*, *N.J.S.A. 18A:12-24.1(e)*, *N.J.S.A. 18A:12-24.1(i)* and *N.J.S.A. 18A:12-24.1(j)* when Respondent Garnica orchestrated, circulated, and signed a petition that proposed to split the Superintendent and Principal positions into two different positions with Respondent Guerrero signing the petition. Both Respondents admit they signed the petition.

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(g)*, *N.J.S.A. 18A:12-24.1(e)*, *N.J.S.A. 18A:12-24.1(i)* and/or *N.J.S.A. 18A:12-24.1(j)* were violated in Count 1. With regard to a violation of *N.J.S.A. 18A:12-24(g)*, Complainant has not demonstrated how signing a public petition in their private capacity would be representing any person or party other than the school board or school district in connection with any cause, proceeding, application or other matter pending before the school district in which they serve. With respect to a violation of *N.J.S.A. 18A:12-24.1(e)*, Complainant has not shown that Respondents made any personal promises or took action beyond the scope of their duties when they signed a petition proposing to split the Superintendent's title into two different titles. Respondents could have made their views known at public meetings or on social media, and therefore, signing the petition would be no different. As to a violation of *N.J.S.A. 18A:12-24.1(i)*, Complainant has not shown how the petition to split the role of Superintendent would be deliberate action which resulted in undermining, opposing, compromising or harming school personnel in the proper performance of their duties. Lastly, as for *N.J.S.A. 18A:12-24.1(j)*,

Complainant has not provided evidence that complaints were submitted to Respondents before they formed and/or signed the petition, and therefore, Complainant has not provided evidence that Respondents acted on or attempted to resolve a complaint.

Accordingly, 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(g), *N.J.S.A.* 18A:12-24.1(e), *N.J.S.A.* 18A:12-24.1(i) and *N.J.S.A.* 18A:12-24.1(j) in Count 1.

Count 2

In Count 2, Complainant argues Respondent Guerreo violated *N.J.S.A.* 18A:12-24(b), *N.J.S.A.* 18A:12-24(c), *N.J.S.A.* 18A:12-24.1(d), *N.J.S.A.* 18A:12-24.1(e), *N.J.S.A.* 18A:12-24.1(f), *N.J.S.A.* 18A:12-24.1(i) and *N.J.S.A.* 18A:12-24.1(j) when she signed the petition concerning the Superintendent's job because she was terminated by Complainant in June of 2022. Respondent Guerrero admits that her contract was not renewed in 2022.

At the outset, the Commission wants to clarify that the matter of termination in, and of itself, is not enough to create a per se conflict of interest for board members related to employment matters for the Superintendent. See *Advisory Opinion A02-24 (A02-24)*. The Commission considers each circumstance on a case-by-case basis to determine whether the public might reasonably perceive that a prior animus has the potential to prejudice or interfere with a board member's independence of judgment in the exercise of their official duties as a board member or could create a justifiable impression that the public trust has been violated. In A02-24, the Commission advised that a board member who was terminated should not participate in or vote on any matter that involved a Superintendent's employment based on the totality of the board member actions, which included the filing of a civil lawsuit against the Superintendent, and placing billboards throughout the towns about the Superintendent. In this matter, Complainant states that Respondent Guerreo was last employed in June of 2022, but does not provide any other reason for potential animus towards the Complainant. Therefore, given the amount of time that has passed since Respondent Guerrero's contract was not renewed, in conjunction with the fact that Complainant has not provided any additional examples of animus, the Commission does not find a basis for there to be a conflict for Respondent Guerrero as to the Superintendent's employment.

Therefore, 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 Respondent Guerrero violated *N.J.S.A.* 18A:12-24(b), *N.J.S.A.* 18A:12-24(c), *N.J.S.A.* 18A:12-24.1(d), *N.J.S.A.* 18A:12-24.1(e), *N.J.S.A.* 18A:12-24.1(f), *N.J.S.A.* 18A:12-24.1(i) and/or *N.J.S.A.* 18A:12-24.1(j) in Count 2. More specifically, as to a violation of *N.J.S.A.* 18A:12-24(b), Complainant has not provided 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." With respect to *N.J.S.A.* 18A:12-24(c), Complainant did not provide sufficient factual evidence that Respondent acted in her official capacity in a matter where she had a direct or indirect financial involvement that might reasonably be expected to impair her objectivity, or in a matter where she had a personal involvement that created some benefit to her, or to a member of her immediate family. Regarding a violation of *N.J.S.A.* 18A:12-24.1(d), Complainant has not demonstrated how

Respondent gave a direct order to school personnel or became directly involved in activities or functions that are the responsibility of school personnel or the day-to-day administration of the school district or charter school when she signed the petition. As to a violation of *N.J.S.A.* 18A:12-24.1(e), Complainant has not demonstrated that Respondent made any personal promises or took action beyond the scope of their duties when she signed a petition in her personal capacity regarding dividing the Superintendent's role into two positions. With respect to a violation of *N.J.S.A.* 18A:12-24.1(f), Complainant has not shown how Respondent took action on behalf of, or at the request of, a special interest group or persons organized and voluntarily united in opinion and who adhere to a particular political party or cause; or evidence that Respondent used the schools in order to acquire some benefit for herself, a member of her immediate family or a friend. As to a violation of *N.J.S.A.* 18A:12-24.1(i), Complainants have not shown how the petition to split the title of Superintendent would be deliberate action which resulted in undermining, opposing, compromising or harming school personnel in the proper performance of their duties. Lastly, as for a violation of *N.J.S.A.* 18A:12-24.1(j), Complainant has not provided evidence that a complaint was submitted to Respondent Guerrero before she signed the petition and therefore, provided evidence that Respondent acted on or attempted to resolve a complaint.

Accordingly, 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(b), *N.J.S.A.* 18A:12-24(c), *N.J.S.A.* 18A:12-24.1(d), *N.J.S.A.* 18A:12-24.1(e), *N.J.S.A.* 18A:12-24.1(f), *N.J.S.A.* 18A:12-24.1(i) and *N.J.S.A.* 18A:12-24.1(j) against Respondent Guerrero in Count 2.

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 Respondents that any allegations stemming from before January 2, 2025, including the entirety of Count 3, were untimely filed, and of the remaining allegations, 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.

Robert W. Bender, Chairperson

Mailing Date: February 24, 2026

***Resolution Adopting Decision
in Connection with C62-25***

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 any allegations stemming from before January 2, 2025, including the entirety of Count 3, were untimely filed; and

Whereas, at its meeting on January 27, 2026, the Commission discussed finding that of the remaining allegations, 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.

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