

Before the School Ethics Commission
Docket No.: C67-25
Final Decision
Summary Disposition

Christine Skurbe,
Complainant

v.

Peter S. Piro, Jr.,
Monroe Township Board of Education, Middlesex County,
Respondent

I. Procedural History

The above-captioned matter arises from a Complaint that was filed with the School Ethics Commission (Commission) on July 11, 2025, by Christine Skurbe (Complainant), alleging that Peter S. Piro, Jr. (Respondent), a member of the Monroe Township Board of Education (Board), violated the School Ethics Act (Act), *N.J.S.A. 18A:12-21 et seq.* More specifically, the Complaint alleged that Respondent violated *N.J.S.A. 18A:12-26(a)(1)*, *N.J.S.A. 18A:12-24(b)* and *N.J.S.A. 18A:12-24(c)*, as well as *N.J.S.A. 18A:12-24.1(j)* of the Code of Ethics for School Board Members (Code). Respondent filed a Written Statement on August 29, 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 Count 1 was untimely filed; there are sufficient facts and circumstances pled in the Complaint and in the Written Statement to lead a reasonable person to believe that the remaining allegations, namely *N.J.S.A. 18A:12-26(a)(1)* in Count 2 and *N.J.S.A. 18A:12-24(c)* in Count 3 were violated as set forth in the Complaint; but insufficient facts and circumstances to lead a reasonable person to believe that the remaining violations alleged in the Complaint were violated. Additionally, in accordance with *N.J.A.C. 6A:28-9.8(a)(1)(ii)*, the Commission voted to decide the above-captioned matter by summary decision and directed Respondent to file a statement setting forth the reasons (Statement of Reasons) he should not be found in violation of the Act. Respondent was also advised that if he disputes any of the facts determined by the Commission to be both material and undisputed, he should set forth the facts with which he disagrees, and why they are material to the case. Finally, Respondent was further advised that the Commission may then make a determination of a violation on a summary basis. Respondent filed a Statement of Reasons on March 30, 2026.

Thereafter, at its meeting on April 28, 2026, the Commission reviewed the record in this matter and, at its meeting on May 26, 2026, adopted a decision finding that Respondent violated *N.J.S.A.* 18A:12-26(a)(1) in Count 2 and *N.J.S.A.* 18A:12-24(c) in Count 3 and recommending a penalty of a reprimand for Respondent's violations of the Act.

II. Summary of the Pleadings

A. *The Complaint*

By way of background, Complainant provides that Respondent is employed by the Monroe Township Police Department (police department). According to Complainant, "upon information and belief," Respondent "used his official position as a [Board] member to advocate for the presence of" local police officers "on or near school property for the purpose of ticketing student drivers who were allegedly parking in unauthorized areas." Complainant notes the Board did not vote to approve the police presence, nor was the impact on the students discussed. Complainant notes that Respondent's advocacy for his employer and his failure to recuse himself from such matters is a breach of the public's trust and abuse of his authority as a Board member.

With the above in mind, in Count 2, (January 24, 2025), Complainant asserts Respondent filed his Personal/Relative Financial Disclosure Statement (Disclosure Statement/FDS) in 2025, but failed to disclose that he was employed by the police department as a "Building Security/Motor Pool Coordinator," when budget worksheets indicate he earned more than \$2,000, in violation of *N.J.S.A.* 18A:12-26(a)(1).

In Count 3 (February 19, 2025), Complainant contends that the District hires Township police officers as "added security" at school sponsored events. In addition, Respondent is a member of the Finance Committee. According to Complainant, the February 19, 2025, agenda contained a "bill list," which had already been approved by the Finance Committee and included two separate line items in the amount of \$1,188 and \$1,956 for payment to the Township for "Special Police Services." Complainant further contends Respondent voted to approve these items, rather than recuse himself in violation of *N.J.S.A.* 18A:12-24(c).

B. *Written Statement*

As to Count 2, Respondent admits that he is an employee of the Township police department, and despite filing his FDS and their approval by the Business Administrator (BA), Respondent "acknowledges that he now understands that he should have listed this position" on his forms. Respondent notes failure to include this employment was "human error and the result of bad information."

Regarding the alleged violation of *N.J.S.A.* 18A:12-24(c) in Count 3, Respondent argues that the District was obligated to pay the charges for the security, based on an agreement between the District and the Township. Therefore, Respondent asserts "there was no reason for Respondent to abstain from voting on paying the District's legitimate obligation under this long-standing agreement."

C. *Statement of Reasons*

Regarding Count 2, Respondent contends he was “unaware of any potential problems with his financial information” until his receipt of this Complaint. Respondent maintains he “was under the inaccurate impression that because he was filing a Disclosure Statement with a statewide Commission, he was only required to report any income he had from the State of New Jersey.” Respondent further maintains he “was not trying to hide his employment, especially since his status as a municipal employee is well known in Monroe.” Respondent notes that, after he “became aware of the omission when he received this Complaint, he offered to file a new Disclosure Statement, however, he was advised by counsel that the Commission does not accept revised Financial Disclosure Statements once one is filed.” Consequently, Respondent indicated that he filed his 2026 Disclosure Statement and reported all income properly.

As to Count 3, Respondent maintains the list of bills “included more than 600 line items totaling in excess of eighteen million dollars.” Respondent argues the allegation is based solely on his employment as a civilian employee of the police department. Respondent indicates that the Complaint alleges that the bill list included “two payments to the Township of Monroe for security services rendered at school basketball games,” specifically “2/20/25 TOWNSHIP OF MONROE – Special Police Services HS Basketball Games \$1,188.00” and “2/20/25 TOWNSHIP OF MONROE – Special Police Services Basketball Games \$1,956.00.” Respondent further argues “Complainant fails to allege facts sufficient to establish that [Respondent’s] approval of the Bill List, to the Township of Monroe, rather than a direct payment to the Monroe Police Department, including the referenced line items, constitutes a conflict of interest under *N.J.S.A. 18A:12-24(c)*.” Moreover, Respondent maintains Complainant has not provided any evidence to demonstrate that Respondent, “a member of his immediate family, or any business organization in which he has an interest, including the Monroe Township Police Department, had a direct or indirect financial involvement that might reasonably be expected to impair his objectivity or independence of judgment,” “[n]or are there any allegations of personal involvement giving rise to a benefit to [Respondent] or his immediate family.” Respondent contends, “If the Commission were to find such transactions [] create a conflict, it would effectively mean that [Respondent] would be conflicted from approving all transactions issued by the Township of Monroe, regardless of which department ultimately provided the service.” Additionally, Respondent argues that the relationship between the police department and the District is “longstanding and governed by a preexisting Memorandum of Agreement” since 1988, and Respondent “had no involvement in the creation, negotiation, or approval of the agreement, and he exercises no control over when police security services are requested or which personnel are assigned.”

III. **Findings of Fact**

Based on its thorough and independent review of the record, the Commission finds the following facts to be undisputed:

1. Respondent has been a Board member in Monroe Township since May 2024. *Complaint* at page 1; *Written Statement* at page 2.

2. Respondent is employed by the Monroe Township Police Department (police department) in the transportation department handling the police department's motor vehicle fleet. *Written Statement* at page 1.
3. As a Board member, Respondent is required to annually file a Disclosure Statement. *Complaint* at pages 2-3; *Written Statement* at pages 5-6.
4. Respondent submitted his 2025 Disclosure Statement on or about January 24, 2025. *Complaint, Exhibit 1 (2025 FDS)*.
5. Respondent's 2025 Disclosure Statement listed NJ State Pension as his sole source of income. *Complaint, Exhibit 1 (2025 FDS)*.
6. Respondent's 2025 Disclosure Statement did not disclose that he received income from the police department. *Complaint, Exhibit 1 (2025 FDS)*.
7. Respondent earned in excess of \$2,000.00 from the police department in the preceding calendar year. *Complaint, Exhibit 5 (Monroe Township Budget Worksheet)*.
8. On February 19, 2025, the monthly bill list appeared on the agenda under the Business Administrator's recommendations. *Complaint* at page 3; *Complaint, Exhibit 4 (Agenda)*.
9. The bill list for the February 19, 2025, Board meeting included two line items for payment to the Township of Monroe in the amounts of \$1,188.00 and \$1,1957.00 for "Special Police Services." *Complaint* at page 3; *Complaint, Exhibit 6 (Bill List Excerpt); Statement of Reasons, Exhibit B (Bill List)*.
10. The February 19, 2025, Bill List included more than 600 items, totaling in excess of \$18,000,000.00. *Statement of Reasons* at page 3; *Statement of Reasons, Exhibit (Bill List)*.
11. The line items for the Bill List on February 19, 2025, appeared as: "C:05483 2/20/25 TOWNSHIP OF MONROE – Special Police Services HS Basketball Games \$1,188.00" and "C:05662 2/20/25 TOWNSHIP OF MONROE – Special Police Services Basketball Games \$1,956.00." *Complaint, Exhibit 6 (Bill List Excerpt); Statement of Reasons, Exhibit B (Bill List)*.
12. Respondent voted to approve the Bill List on February 19, 2025. *Complaint* at page 3; *Complaint, Exhibit 3 (Minutes); Statement of Reasons* at pages 3-4.
13. The District entered into a Memorandum of Agreement (MOA) with the police department, beginning in 1988, and most recently amended in 2023 and signed by the parties in December 2024. *Statement of Reasons, Exhibit C*.

IV. Analysis and Conclusions of Law

Complainant alleges that Respondent violated *N.J.S.A. 18A:12-26(a)(1)*, which states that financial disclosure statements must include:

(1) Each source of income, earned or unearned, exceeding \$2,000 received by the school official or a member of his immediate family during the preceding calendar year. Individual client fees, customer receipts or commissions on transactions received through a business organization need not be separately reported as sources of income. If a publicly traded security or interest derived from a financial institution is the source of income, the security or interest derived from a financial institution need not be reported unless the school official or member of his immediate family has an interest in the business organization or financial institution.

Complainant also argues that Respondent violated *N.J.S.A.* 18A:12-24(c), and this provision of the Act states:

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;

Count 2

Section III, Question 1 of the FDS form asks, “In the preceding calendar year, did you or a member of your immediate family receive income, earned or unearned, in excess of \$2,000.00?”

The Commission finds that Respondent inaccurately completed his 2025 Disclosure Statements when he did not report his employment with the police department on his FDS. Despite earning more than \$2,000.00 in his employment, Respondent did not include this source of income. While Respondent contends he “was under the inaccurate impression that because he was filing a Disclosure Statement with a statewide Commission, he was only required to report any income he had from the State of New Jersey,” the Commission notes that the question is clear that any source of income over \$2,000.00 needs to be included. Accordingly, Respondent’s failure to include income on his FDS violated *N.J.S.A.* 18A:12-26(a)(1).

Count 3

N.J.S.A. 18A:12-24(c) prohibits a school official from acting in his official capacity in a matter where he, a member of her immediate family, has a direct or indirect financial involvement that might reasonably be expected to impair his objectivity or independence of judgment, and from acting in his official capacity in a matter where he or a member of his immediate family has a personal involvement that is or creates some benefit to him or a member of his immediate family.

The Commission finds that Respondent had a direct or indirect financial interest in the police department, as it is his employer and a source of his income, and therefore, acting in his official capacity in matters involving the police department, such as voting on payment to his employer, might reasonably be expected to impair his objectivity or independence of judgment. Regardless of whether the resolution was large, specifically 600 line items, totaling in excess of \$18,000,000, Respondent nevertheless has a responsibility to be aware of what he is approving and ensure that he does not have a conflict of interest. The Commission does not find Respondent's argument – that Respondent's approval of the Bill List did not constitute a conflict of interest because the payments were to the Township rather than directly to the police department – to be persuasive. While Respondent works at the police department, his employer is the Township. Accordingly, a bill to the Township for police services would undoubtedly constitute a conflict of interest. Further, whether a MOA exists to provide police services to the schools is irrelevant as to whether Respondent has a conflict with respect to the police department. Respondent took official action and voted on a matter in which he had a conflict of interest as Respondent has a financial involvement with his employer. Simply put, voting on a matter in which Respondent was conflicted financially violates the Act. Accordingly, the Commission finds that Respondent violated *N.J.S.A.* 18A:12-24(c).

V. Recommended Penalty

Having found that Respondent violated *N.J.S.A.* 18A:12-26(a)(1) and *N.J.S.A.* 18A:12-24(c), the Commission is authorized to recommend to the Commissioner of Education (Commissioner) an appropriate penalty, which may range from reprimand to removal. *N.J.S.A.* 18A:12-29(c).

In its review, the Commission finds that a reprimand is the most appropriate penalty. The Commission finds that Respondent's employment was required to be on his FDS, and Respondent should not have voted on a matter involving his employment; however, as Respondent was a newer board member and as he did not have control over the request to use police services at the basketball games, the Commission finds a reprimand to be warranted in this matter.

VI. Decision

For the reasons set forth above, the Commission recommends that the Commissioner impose a penalty of reprimand for the violations of *N.J.S.A.* 18A:12-26(a)(1) and *N.J.S.A.* 18A:12-24(c).

Pursuant to *N.J.S.A.* 18A:12-29(c), this decision shall be forwarded to the Commissioner for review of the Commission's recommended penalty. The parties may either: 1) file exceptions to the recommended sanction; 2) file an appeal of the Commission's finding of a violation; or 3) file both exceptions to the recommended sanction together with an appeal of the finding of a violation.

Parties taking exception to the recommended sanction of the Commission but *not disputing* the Commission's finding of a violation may file, **within thirteen (13) days** from the

date the Commission’s decision is forwarded to the Commissioner, written exceptions regarding the recommended penalty to the Commissioner. The forwarding date shall be the mailing date to the parties, as indicated below. Such exceptions must be forwarded to: Commissioner of Education, c/o Office of Controversies and Disputes, P.O. Box 500, Trenton, New Jersey 08625, marked “Attention: Comments on Ethics Commission Sanction,” as well as to (ControversiesDisputesFilings@doe.nj.gov). A copy must also be sent to the Commission (school.ethics@doe.nj.gov) and all other parties.

Parties seeking to appeal the Commission’s finding of a violation *must* file an appeal pursuant to the standards set forth at *N.J.A.C. 6A:4:1 et seq.* **within thirty (30) days** of the filing date of the decision. The filing date shall be three (3) days after the date of mailing to the parties, as shown below. In such cases, the Commissioner’s review of the Commission’s recommended sanction will be deferred and incorporated into the Commissioner’s review of the finding of violation on appeal. Where a notice of appeal has been filed on or before the due date for exceptions to the Commission’s recommended sanction (thirteen (13) days from the date the decision is mailed by the Commission), exceptions need not be filed by that date, but may be incorporated in the appellant’s briefs on appeal.

Robert W. Bender, Chairperson

Mailing Date: May 26, 2026

***Resolution Adopting Decision
in Connection with C67-25***

Whereas, at its meeting on April 28, 2026, the School Ethics Commission (Commission) considered the Complaint, Written Statement, and Statement of Reasons submitted by Respondent, in this matter; and

Whereas, at its meeting on April 28, 2026, the Commission discussed finding a violation of *N.J.S.A.* 18A:12-26(a)(1) and *N.J.S.A.* 18A:12-24(c); and

Whereas, at its meeting on April 28, 2026, the Commission discussed recommending a penalty of reprimand for the violations of *N.J.S.A.* 18A:12-26(a)(1) and *N.J.S.A.* 18A:12-24(c); and

Whereas, at its meeting on May 26, 2026, the Commission reviewed and voted to approve the within decision as accurately memorializing its actions/findings from its meeting on April 28, 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 meeting on May 26, 2026.

Brigid C. Martens, Director
School Ethics Commission