

IN THE MATTER OF : NEW JERSEY DEPARTMENT OF EDUCATION  
THE CERTIFICATES OF : STATE BOARD OF EXAMINERS  
THERESA GUERRIERE : ORDER OF REVOCATION  
\_\_\_\_\_ : DOCKET NO: 1920-110

Theresa Guerriere (Guerriere) is the holder of a Teacher of Health Education Standard certificate, issued July 1990; a Teacher of the Handicapped Standard certificate, issued September 1992; and a Teacher or Driver Education Standard certificate, issued June 1993.

At its meeting of November 1, 2019, the State Board of Examiners (Board) reviewed information it received from the Department of Education (DOE) - Office of Student Protection (OSP) and the DOE - Office of Legal Affairs, Accountability & Compliance (OLAAC), including documents obtained from the New Jersey Superior Court - Atlantic County Vicinage, regarding Guerriere. In August 2018, Guerriere was indicted for Theft by Deception – False Impression (3<sup>rd</sup> degree), *N.J.S.A. 2C:20-4*, Conspiracy – Agree/Engage in Conduct Constituting a Crime (3<sup>rd</sup> degree), *N.J.S.A. 2C:5-2A(1)*, and Unsworn Falsification (4<sup>th</sup> degree), *N.J.S.A. 2C:28-3A*. It was alleged that she received disaster relief funds after Hurricane Sandy by falsely claiming a property in Brigantine was her primary residence at the time of the storm. On July 11, 2019, Guerriere received an Order of Postponement and was entered into the Pre-Trial Intervention (PTI) program for a period of twelve (12) months and was required to complete twenty-five (25) hours of community service and make restitution in the amount of \$7,900.00.

After reviewing the above information, the Board voted to issue an Order to Show Cause (OSC) to Guerriere as to why her certificates should not be revoked at its December 13, 2019 meeting. On January 13, 2020, Guerriere filed an Answer to the OSC. *See Answer.*

In her Answer, Guerriere admitted that she was indicted on the alleged charges and “that

the charges were based on her alleged-unlawful receipt of Hurricane Sandy disaster funds by stating on her application for government relief that her primary residence was located in Brigantine, New Jersey.” *Id.* at ¶ 3. However, she denied that she engaged in any of the alleged conduct or any wrongdoing. *Ibid.* She claimed she permanently resided in Brigantine at all times at issue in this matter. *Ibid.* And that she resided in Brigantine “multiple days during the week[,]” “paid taxes there[,]” “had that address on her driver’s license[,]” and that the Board sent her the OSC to her Brigantine address and as such she “was entitled to the relief funds” and did not commit a “criminal act nor wrongdoing.” *Ibid.*

Guerriere admitted that she received an Order of Postponement and was admitted into PTI for a period of twelve months, was required to complete 25 hours of community service, and was ordered to pay \$7,900 in restitution, amongst other conditions. *Id.* at ¶ 4. She claims no guilty plea was entered and maintained her innocence. *Ibid.* She also claimed there is no just cause for considering the revocation of her licenses as her certification has been in good standing for thirty (30) years and she continues to meet all the requirements to hold her licenses. *Id.* at ¶ 5. Further, she claimed that there is no just cause for revocation because she is “a person of high moral character and an honest, peaceful, law-abiding Certificate-Holder.” *Id.* at ¶ 6. As there were material facts in dispute, the Board transmitted the matter to the Office of Administrative Law (OAL) for a hearing as a contested case on January 22, 2020.

On January 26, 2022, the Administrative Law Judge (ALJ) issued an Initial Decision granting summary decision, finding that there were no material facts in dispute regarding Guerriere’s actions and that her actions constituted unbecoming conduct warranting the revocation of her teaching certificates. *In the Matter of the Certificates of Theresa Guerriere*, OAL Dkt. No. EDE 01212-20 (Initial Decision, January 26, 2022). Counsel for Guerriere filed exceptions to the

Initial Decision, the DAG representing the Board filed reply exceptions, and counsel for Guerrier filed sur reply exceptions. On December 9, 2022, the Board voted to adopt its written decision adopting the Initial Decision from the ALJ and revoking Guerriere's educator certificates. *In the Matter of the Certificates of Theresa Guerriere*, Agency Dkt. No. 1920-110 (Decision, Board of Examiners, December 9, 2022).

On December 22, 2022, Guerriere filed an appeal with the Commissioner of Education (Commissioner). On April 3, 2023, the Commissioner issued a final decision affirming the Board's decision revoking Guerriere's certificates. *In the Matter of the Certificates of Theresa Guerriere, State Board of Examiners, New Jersey Department of Education*, Agency Dkt. No. 10-12/22A (Final Decision, Comm'r of Educ., April 3, 2023). On April 18, 2023, Guerriere filed a notice of appeal with the Superior Court, Appellate Division.

On June 13, 2024, the Appellate Division issued its decision affirming in part, reversing in part, and remanding the matter. *In re Guerriere*, 2024 N.J. Super. Unpub. LEXIS 1189, 2024 WL 2967279 (June 13, 2024). Specifically, the Appellate Division found that there was already a determination regarding the issue of Guerriere's primary residence. *Id.* at \*14. The Appellate Division also found that Guerriere was collaterally estopped from relitigating the issue of her primary residence. *Ibid.* However, the court found that the OAL, Board and Commissioner had erroneously applied collateral estoppel to say that finding as to primary residence "conclusively determine[d] Guerriere made material misrepresentations supporting [a finding of] unbecoming conduct[.]" *Id.* at \*15. Accordingly, the Appellate Division remanded the matter for a hearing on the material facts in dispute. *Ibid.*

On June, 17, 2024, the Commissioner remanded the matter to the Board for further proceedings consistent with the Appellate Division's decision. *In the Matter of the Certificates of*

*Theresa Guerriere, State Board of Examiners, New Jersey Department of Education, Agency Dkt. No. 10-12/22A (Final Decision, Comm’r of Educ., June 17, 2024).*

On July 12, 2024, the Board remanded this matter back to the OAL for further proceedings. Specifically, the Board directed the ALJ to issue an initial decision on remand consistent with the Appellate Division’s decision.

On November 17, 2025, Administrative Law Judge (ALJ) Tama B. Hughes issued an Initial Decision on Remand. *In the Matter of the Certificates of Theresa Guerriere*, OAL Dkt. No. EDE 09634-24 Initial Decision on Remand (November 17, 2025). The hearing in this matter took place on April 8 and 9, 2025, and June 24, 2025. *Id.* at 2. Following testimony and the submission of closing briefs, the record in this matter closed on October 24, 2025. *Ibid.*

The ALJ heard testimony from four witnesses on behalf of the Board – Aliya Simnor, Thalia Treby, Nita Patel, and Theresa Guerriere – and from two witnesses on behalf of Guerriere – herself and Harry Guerriere. *Id.* at 6-17. The ALJ “found both Simnor and Treby to be very candid and credible,” and found both Theresa and Harry Guerriere’s testimony to not be credible. *Id.* at 20. The ALJ found that “[a]fter hearing the testimony and in review of the documentary evidence presented in this matter, [she] ha[d] difficulty giving credence to the testimony of [Theresa] Guerriere and [Harry Guerriere]. For two highly educated individuals, their testimony was unconvincing and came across as contrived.” *Id.* at 18. The ALJ also found that “[i]t is difficult to put into words how implausible [she] found [Harry Guerriere’s] testimony to be.” *Id.* at 19. Further, the ALJ “found [Theresa] Guerriere’s testimony to be equally disingenuous[,]” “consistently vague” “despite the fact that the questions were clear and straightforward.” *Ibid.* The ALJ also found the Theresa Guerriere’s response “defie[d] common sense[,]” were “contradictory” and “didn’t add up.” *Id.* at 19-20.

The ALJ found as undisputed facts that at the time Hurricane Sandy hit on October 29, 2012, “all of the Guerriere’s vital documents – driver’s license, voting records, mailing address, motor vehicle registration and work records – reflected the Condo [in Jersey City] as their primary residence.” *Id.* at 3. The ALJ determined that “Guerriere’s actions, which were unequivocally in concert with her husband, of changing their vital documents from the Condo to the Brigantine property, to be a calculated move so as to qualify for Sandy relief funds, which required proof of residency.” *Id.* at 23-24. The ALJ also determined that “Guerriere’s actions were intentionally misleading when she claimed the Brigantine property to be their primary residence when she applied for [Homeowner Resettlement Program] grant money and signed the grant agreement and promissory note and when she applied for the [Renovation, Reconstruction, Elevation and Mitigation Program] monies.” *Id.* at 24.

Overall, the ALJ found that “[i]t is difficult to believe that despite ‘believing’ for years the Brigantine property, their ‘home,’ was their primary residence, they at no time prior to the hurricane took any steps to change even one of their vitals documents [] to reflect this. It further stretches credulity that neither [Theresa] Guerriere nor her husband, both of whom are highly intelligent, educated and credentialed individuals, had never heard of the term ‘primary residence’ or had any inkling of what it meant at the time of filing, and that it wasn’t until they went before Judge Miller that they had a true understanding of the term.” *Id.* at 27. The ALJ also found that “Guerriere and her husband took affirmative steps to knowingly and intentionally change all of their vital documents to intentionally misrepresent to the State and/or Federal Government, that their Brigantine property was their primary residence so as to obtain grant monies that they were not otherwise entitled to.” *Ibid.* As such, the ALJ concluded that the Board met its burden of

proof that Theresa “Guerriere’s intentional actions and misrepresentations constituted conduct unbecoming.” *Id.* at 28.

As to penalty, the ALJ noted that Guerriere’s actions, and that of her husband, “did not involve one isolated incident – rather a continuum of fraudulent acts from systematically changing their vital documents to reflect the Brigantine property as their primary residence after the hurricane to filing for grants and loans for Hurricane Sandy relief funding – all to obtain money to fix their Brigantine property which allegedly had thousands of dollars’ worth of damage.” *Id.* at 28-29. The ALJ found that “[s]uch acts of deception reflect a lack of integrity, which in turn could adversely affect the shaping of students attitudes and militate against [Theresa Guerriere] being an appropriate role model.” *Id.* at 29. The ALJ concluded that her actions warrant the revocation of her teaching certificates. *Ibid.*

On December 9, 2025, counsel for Guerriere filed exceptions to the Initial Decision. *See Exceptions to Initial Decision on Remand.* In her exceptions, Guerriere objected to ALJ Hughes presiding over the hearing after she made credibility, factual, and legal findings on the underlying motion for summary decision and argued that the ALJ’s denial of her motion for recusal was reversible error. *Id.* at 3-4, 21-26. She also argued that there were no material misrepresentations, but rather she made a reasonable and honest mistake. *Id.* at 26-35. Further, she argued “that the Board’s witnesses added nothing regarding [her] intent,” and that they “simply reaffirmed that Brigantine was not [her] primary address from a legal standpoint.” *Id.* at 36. Lastly, she argued that the ALJ improperly discounted her stellar record of more than 30 years without any prior disciplinary infractions when determining the appropriate penalty. *Id.* at 39-41.

On December 22, 2025, the DAG representing the Board filed reply exceptions. *See Reply Exceptions to Initial Decision on Remand.* The DAG argued that the ALJ’s decision was well-

reasoned and amply supported by the record and should be adopted in its entirety. *Id.* at 1, 9-16. The DAG also argued that Guerriere’s self-serving and contradictory testimony belie the claim that it was an honest mistake. *Id.* at 1, 17-18. Further, the DAG argued that there was no showing by Guerriere that the ALJ’s credibility findings were arbitrary, capricious or unreasonable or not supported by sufficient, competent, credible evidence in the record. *Id.* at 18.

The Board must now determine whether to adopt, modify, or reject the Initial Decision on Remand in this matter. At its meeting of January 22, 2026, the Board reviewed the Initial Decision on Remand. After full and fair consideration of the Initial Decision on Remand, the Exceptions, and the Reply Exceptions, the Board voted to adopt the Initial Decision on Remand.

The Board has the authority to “issue appropriate certificates to teach or to administer,” and “may revoke the same under rules and regulations prescribed by the State board.” *N.J.S.A.* 18A:6-38; *see also N.J.A.C.* 6A:9B-3.2 and -4.4; *Morison v. Willingboro Bd. of Educ.*, 478 N.J. Super. 229 (App. Div. 2024), *cert. denied* 258 N.J. 143 (July 11, 2024). The Board may take action against a certificate holder on the basis of “demonstrated inefficiency, incapacity, conduct unbecoming a teacher, or other just cause.” *N.J.A.C.* 6A:9B-4.4(a); *see also Morison*, 478 N.J. Super. at 246, 248 (explaining the Board is responsible for protecting schoolchildren from improper teacher conduct and may suspend or revoke an educator’s continued ability to serve as a teacher at any public school based on unbecoming conduct).

The Board’s long-standing belief is that teachers must serve as role models for their students. “Teachers . . . are professional employees to whom the people have entrusted the care and custody of . . . school children. This heavy duty requires a degree of self-restraint and controlled behavior rarely requisite to other types of employment.” *Tenure of Sammons*, 1972 *S.L.D.* 302, 321. A “violation of the implicit standard of good behavior which devolves upon one

who stands in the public eye as an upholder of that which is morally and legally correct” may provide the basis for a finding of unbecoming conduct. *Bound Brook Bd. of Educ. v. Ciripompa*, 228 N.J. 4, 14 (2017) (quoting *Karins v. City of Atlantic City*, 152 N.J. 532, 555 (1998)) (internal quotation marks omitted). The “elastic” concept of “conduct unbecoming” includes “conduct which adversely affects the morale or efficiency” of the public entity, or “which has a tendency to destroy public respect for . . . [public] employees and confidence in the operation of [public] services.” *In re Emmons*, 63 N.J. Super. 136, 140 (App. Div. 1960) (internal quotations and citations omitted); *see also Bound Brook Bd. of Educ.*, 228 N.J. at 13.

As noted above, after determining the undisputed material facts in the record, the ALJ found that there was sufficient evidence presented by the Board demonstrating that Guerriere engaged in conduct unbecoming when she and her husband, “after Hurricane Sandy, and after their Brigantine property suffered thousands of dollars’ worth of damage,” “took affirmative steps to knowingly and intentionally change all of their vital documents to intentionally misrepresent” that their Brigantine property was their primary residence on the day of Hurricane Sandy “to obtain grant monies that they were not otherwise entitled to.” There is no doubt that the ALJ was in the best position to render credibility determinations in this matter. Accordingly, the Board will defer to those findings. As Guerriere has failed to demonstrate that the ALJ’s factual findings and credibility determinations were improper or not supported by the record, the Board does not find a sufficient basis by which it could modify the initial decision or remand. *N.J.A.C. 1:1-18.6(b)*.

The Board agrees with the ALJ that Guerriere’s actions here fall far short of the high standard of conduct expected of an educator. Specifically, Guerriere’s after-the-fact actions to attempt to change the determination of her primary residence at the time of the hurricane in order to reap financial benefit “evidences a serious lapse in judgment, violates the public’s trust in public

employees and public services, and demonstrated that [she] is ill-suited to be a role model for students.” See *In the Matter of the Certificates of Harry Guerriere, State Board of Examiners, New Jersey Department of Education*, at \* 6, Commissioner Final Decision (December 22, 2025) (finding that Guerrier’s husbands’ proven actions amounted to unbecoming conduct). Guerriere’s arguments that her actions were a mistake rather than intentional actions to gain grant money to repair her property that was not her primary residence are belied by the record, which demonstrates the multiple actions she took and the timing of when she took them, in addition to her contradictory and incredulous testimony.

The Board also agrees with the ALJ that Guerriere’s conduct warrants revocation of her certificates as her “acts of deception reflect a lack of integrity, which in turn could adversely affect the shaping of student attitudes and militate against [Guerriere] being an appropriate role model.” *Initial Decision on Remand*, at \*29. The Board acknowledges Guerriere’s lengthy career in education and that she had no prior disciplinary action on her certifications. However, as noted above, the ALJ found that revocation of her certificates was warranted because “it was not one isolated instance of misconduct but rather a series of actions[.]” a “continuum of fraudulent acts[.]” Guerriere’s behavior here is inexcusable for a teacher and revocation of her certificates is warranted. See *In the Matter of the Certificates of Eloise Stewart*, Agency Dkt. No. 1516-189, State Board of Examiners (July 27, 2017), affirmed Commissioner of Education (February 15, 2018) (revoking certificate for knowingly submitted a fraudulent course catalogue description in support of her certification application); *In the Matter of Certificates of Christopher Cassese*, Agency Dkt. No. 1718-202, State Board of Examiners (January 24, 2019) (revoking certificate for submitting claims with false information to the Department of Labor for compensation); *In the Matter of the Credential of Shauna E. Morgan*, Agency Dkt. No. 1314-190, State Board of

Examiners (August 1, 2019) (revoking certificate for providing false information to her employer and then creating a story to obfuscate what she had done); *In the Matter of the Certificate of David Toller*, Agency Dkt. No. 0405-209, State Board of Examiners (October 28, 2004) (revoking certificate for participating in scheme to defraud the State Health Benefits Program). Thus, the ALJ's initial decision on remand finding unbecoming conduct warranting revocation was proper.

Accordingly, on January 22, 2026, the Board voted to adopt the Initial Decision on Remand. On this 6th day of March 2026, the Board formally adopted its written decision to adopt the Initial Decision on Remand in this matter and it is therefore ORDERED that Theresa Guerriere's Teacher of Health Education Standard certificate, Teacher of the Handicapped Standard certificate, and Teacher or Driver Education Standard certificate are hereby REVOKED, effective immediately.



---

Rani Singh, Secretary  
State Board of Examiners

**Date of Mailing:  
via certified and regular mail**

Appeals may be made to the Commissioner of Education pursuant to the provisions of *N.J.S.A.* 18A:6-38.4.