



## State of New Jersey

DEPARTMENT OF EDUCATION

PO Box 500

TRENTON, NJ 08625-0500

PHILIP D. MURPHY  
Governor

TAHESHA L. WAY  
Lt. Governor

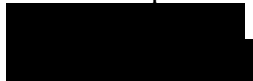
KEVIN DEHMER  
Acting Commissioner

### SCHOOL ETHICS COMMISSION

November 6, 2024

#### For Complainant

Keith S Kaplan



#### For Respondent

Jonathan G. Rodriguez



SUBJECT: KEITH S KAPLAN v. JONATHAN G RODRIGUEZ, TEANECK BOARD OF EDUCATION, BERGEN COUNTY, SCHOOL ETHICS COMMISSION DOCKET #C88-24

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Dear Parties:

Please allow this correspondence to acknowledge the School Ethics Commission's (Commission) receipt of a filing by the named Complainant in connection with the above-captioned matter. In the **Complaint**, which was received by the Commission on October 29, 2024, it is contended that the named Respondent violated the following provisions of the School Ethics Act (Act):

- **Count 1: October 22, 2024: N.J.S.A. 18A:12-24.1(e)**
- **Count 2: October 22, 2024: N.J.S.A. 18A:12-24(b)**
- **Count 3: October 22, 2024: N.J.S.A. 18A:12-24.1(f)**

Respondent shall have **twenty (20) days from receipt**<sup>1</sup> of the Complaint within which to file a **Written Statement** in accordance with *N.J.A.C. 6A:28-7 et seq.*

Pursuant to *N.J.A.C. 6A:28-7.2*, a Written Statement shall:

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<sup>1</sup> If mailed, "receipt" shall be deemed to be three (3) days from the date of this notice. If sent electronically, "receipt" shall be deemed to be the same date of this notice.

1. Fully and completely advise the parties and the Commission as to the nature of Respondent's defenses for each allegation, including any grounds upon which dismissal should be granted.
2. Admit or deny each allegation set forth in the Complaint with specificity. Denials shall fairly meet the substance of the allegations being denied. If Respondent intends in good faith to deny only part of an allegation, Respondent shall specify which parts are true and deny only the remainder.
3. Be signed by Respondent and Respondent shall certify as to the accuracy of the Written Statement.

In the Written Statement, Respondent may allege that the Complaint is frivolous pursuant to the standard set forth in *N.J.S.A. 18A:12-29(e)*. If Respondent asserts that the Complaint is frivolous, Complainant shall then have twenty (20) days from receipt of the frivolous allegation within which to file a response to the frivolous allegation **only**. *N.J.A.C. 6A:28-7.2(b)*.

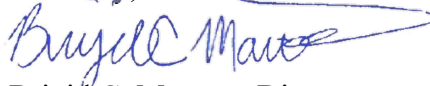
Respondent's Written Statement must either be mailed **or** emailed to the Commission and to the named Complainant along with proof of service conforming to the requirements set forth in *N.J.A.C. 6A:28-1.7*. For ease of reference, the Commission's mailing address is School Ethics Commission, c/o New Jersey Department of Education, P.O. Box 500, Trenton, New Jersey 08625, and the Commission's email address is [school.ethics@doe.nj.gov](mailto:school.ethics@doe.nj.gov).

After Respondent files a Written Statement, and Complainant files a response to an allegation of frivolous filing (if asserted by Respondent), the Commission shall decide, by majority vote, whether **probable cause** exists for the allegations in the Complaint. 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. If the Commission does not find probable cause, the above-captioned matter will be dismissed. If the Commission finds probable cause for the allegations in the Complaint, the above-captioned matter shall be processed in accordance with *N.J.A.C. 6A:28-9.8*.

Subject to the exceptions set forth at *N.J.A.C. 6A:28-6.6(g)*, the Commission shall hold all information confidential regarding any pending matter until the Commission finds that a school official has violated the Act, or until such time that the above-captioned matter is settled, withdrawn or dismissed.

If you have any questions, please contact our office at [school.ethics@doe.nj.gov](mailto:school.ethics@doe.nj.gov).

Sincerely,



Brigid C. Martens, Director  
School Ethics Commission