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Antoinette R. Thompson : BEFORE THE SCHOOL
v. : ETHICS COMMISSION
OF NEW JERSEY
Linda L. Clemons, Beverly J. Hutton, in their : SCHOOL ETHICS ACT
capacities as President and Vice-President of the
Board of Trustees of The Institute for
Excellence Charter School, Hammonton, New
Jersey
_____ : COMPLAINT FORM

I, Antoinette R. Thompson, residing at [REDACTED] Sicklerville NJ 08081
[REDACTED], request the School Ethics Commission to consider a complaint against the above-
named Respondent(s) whose home address is (home address of respondent(s)), in accordance
with the authority of the School Ethics Commission to entertain such complaints under N.J.S.A.
18A:12-21 et seq.

**The facts upon which this complaint is based are as follows: (print additional pages as
needed)**

1. Statement of facts: Complainant is employed as Director of Education by The Institute for Excellence Charter School in Hammonton, New Jersey. Linda Clemons, Board President and Lead Founder of the Institute of Excellence Charter School, asked complainant to process for payment an invoice in the amount of \$4,950, to be approved at the following board meeting, that Ms. Clemons knew to be fraudulent. The invoice was created by Ms. Clemons, and the company represented on the invoice was a fictitious company devised in order for Ms. Clemons to receive the funds.

Date of occurrence: August 16, 2009.

Complainant asserts this to be a violation of: N.J.S.A. 18A:12-24(a), (b) and (c).

2. Statement of facts: Beverly Hutton, Vice President of the Board of Trustees of the Institute for Excellence Charter School, routinely engages in behaviors constituting the administration of the schools, including but not limited to the following:
- a. Coming into the classrooms of the school unannounced on or about November 30, 2009, observing and interview teaching staff for approximately three hours, and then requesting lesson plans from Complainant.
 - b. Intervening in disciplinary matters in the classroom.
 - c. Addressing a student in a disciplinary matter.
 - d. Falsely informing several of the teachers that they were ineligible for tenure because they worked in a charter school.
 - e. Holding a conversation with the Assistant Director of the school, Mr. Clifton Matthew, in which she discussed Complainant's job performance and the Board of Trustees' position on Complainant's job performance.

Date of occurrence: November 30, 2009, and at other times within 180 days of the filing of this complaint.

Complainant asserts this to be a violation of: N.J.S.A. 18A:12-24.1(d) and (g).

3. Statement of facts: Board President Linda Clemons routinely engages in behaviors constituting the administration of the schools, including but not limited to the following:
- a. Responding to parent complaints without the involvement of the Director and Assistant Director.
 - b. Entering the school on a regular basis ostensibly to address parental concerns.
 - c. Overseeing, along with her fellow Board members, the school website that contains a discussion forum and blog, which is managed by the Board containing no statements that complaints should be directed to the school's administrative personnel.
 - d. Reviewing student files.
 - e. Sending an e-mail to parents requesting a critique of the first month of school without the knowledge of the administrative staff, and not sharing with the administrative staff the responses to her e-mail.
 - f. Using the school custodian on numerous occasions as a personal chauffeur during his work hours.
 - g. Routinely approaching staff members to borrow money.
 - h. On or about November 19, 2009, coming to the school to make copies of flyers on the school's copier to distribute to teachers for a "tattoo party" at her home on November 22, 2009, the purpose of which was to raise money to pay her rent.
 - i. On or about January 18, 2010, demanding that the Director supply her with the passwords and access codes for the school. Complainant informed Ms. Clemons that releasing the passwords and access codes would jeopardize the integrity of the school's system and put confidentiality at risk; however, Ms. Clemons persisted in her demand for this information so that it could be given to the spouse of a fellow Board member. Complainant explained to Ms. Clemons that the New Jersey

Department of Education had explicitly told her that she was not to release this information to Ms. Clemons or anyone other than the school's IT service provider, but Ms. Clemons persisted in her demand, to the point where Ken Figgs, the New Jersey Department of Education's Manager of Charter Schools was required to intervene.

- j. Breaching the confidentiality of the Board's executive session by telephoning an employee to inform him of the details of discussions that took place regarding that employee. The meeting in question ended at approximately 12:00 midnight. The employee came to work the following morning and informed administration that he had received a phone call from Mrs. Clemons at 12:30 a.m. that morning.
- k. Involving herself in resolving a parental concern by contacting a teacher directly on January 19 and 20, 2010. The teacher was upset and fearful about her job security following that encounter.

Date of occurrence: on or about November 19, 2009, January 18-20, 2010, and at other times within 180 days of the filing of this complaint.

Complainant asserts this to be a violation of: N.J.S.A. 18A:12-24(a), (b) and (c) , and N.J.S.A. 18A:12-24.1(d), (g), (i) and (j).

WHEREFORE, I, as Complainant, request that the School Ethics Commission find and determine that the above-named Respondent(s) has violated the School Ethics Act and that he or she be subject to such penalty as provided by the Act.

Date: January 25, 2010



Signature of Complainant

CERTIFICATION UNDER OATH

Antoinette Thompson, of full age, being duly sworn upon his or her oath according to law deposes and says:

1. I am the complainant in this matter.
2. I have read the complaint and aver that the facts contained therein are true to the best of my knowledge and belief and I am aware that the statute that created the School Ethics Commission authorizes the School Ethics Commission to impose penalties for filing a frivolous complaint. N.J.S.A. 18A:12-29(e). I am aware that if the respondent alleges that the complaint is frivolous, I shall have 20 days from receipt of the answer to respond to the allegation.
3. The subject matter of this complaint is not pending in any court of law or administrative agency of this State, although certain of the allegations are the subject of an investigative report issued by the New Jersey Department of Education Office of Fiscal Accountability and

For Agency Use Only
Docket Number: _____

Compliance. I will advise the School Ethics Commission if I subsequently become aware that it is pending elsewhere.

Antoinette K. Thompson
Signature of Complainant

Date: January 28, 2010

Sworn and subscribed to before me this 28th day of January 2010.

Sarah Abby Elkholy-Eissa

SARAH ABBY ELKHOLY-EISSA
NOTARY PUBLIC
STATE OF NEW JERSEY
MY COMMISSION EXPIRES APR. 18, 2012