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| NATALIA IOFFE | : | |
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| V. | : | BEFORE THE SCHOOL |
| | : | ETHICS COMMISSION |
| | : | OF NEW JERSEY |
| DEJON MORRIS | : | SCHOOL ETHICS ACT |
| _____ | : | COMPLAINT FORM |

I, Natalia Ioffe, residing at **218 Bright St, Jersey City, NJ 07302**, email address **natasha.ioffe@gmail.com** request the School Ethics Commission to consider a complaint against the above-named Respondent(s) whose home address is **22 Tottenham Ct, Jersey City, NJ 07305** and email address is **dejonld31@gmail.com**, 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:

1. On November 7, 2023, Mr. Dejon Morris was elected to Jersey City Board of Education

2. On November 14, 2023, Mr. Morris contacted me via electronic text inquiring whether it was too late for a law firm to bid with the Jersey City Public School District/Jersey City Board of Education (JCBOE), and indicating that law firms at the NJ League of Municipalities conference in Atlantic City were asking him about it

3. On November 17, 2023, Mr. Morris spoke with me on the phone and informed me that, while he was in attendance at the NJ League of Municipalities conference he engaged in conversation with Mr. Elnardo Webster Jr. on the topic of legal services for JCBOE. and Mr. Webster subsequently recommended a legal firm named "Souder, Shabazz & Woolridge Law Group"

4. Another attendee the of the NJ League of Municipalities conference brought to my attention that Mr. Morris told them that he has personally met with the representatives of "Souder, Shabazz & Woolridge Law Group"

5. In the following days Mr. Morris shared that he had made personal contact with representatives of "Souder, Shabazz & Woolridge Law Group" and suggested that I should meet with them in my capacity as JCBOE President, which I declined explaining that any potential vendor for the JCBOE must follow the RFP process and any personal engagement would be unethical

6. On December 8, 2023, Mr. Morris brought up the firm "Souder, Shabazz & Woolridge Law Group" during a group meeting, mentioning that he has met with representatives of the group in Atlantic City over drinks, and praised the potential merits of the firm

7. On December 26, 2023, Mr. Morris brought up the legal firm “Souder, Shabazz & Woolridge Law Group” during a group meeting, sharing that he has met representatives of the firm and praised the potential merits of the firm

8. On January 2, 2024, the JCBOE issued an RFP for legal services

9. On January 11, 2024, Mr. Morris was officially sworn in as a JCBOE trustee and began serving in that capacity

10. On January 12, 2024, the JCBOE received responses to the RFP for legal services. The legal firm “Souder, Shabazz & Woolridge Law Group” was one of the respondents

11. On January 25, 2024, during a regular meeting of the Jersey City Board of Education a representative of “Souder, Shabazz & Woolridge Law Group” was present in the audience during the board’s voting process

12. In all subsequent joint deliberations of board trustees, spanning from January 20, 2024 through February 26, 2024, Mr. Morris has vigorously lobbied for the “Souder, Shabazz & Woolridge Law Group” and did not recuse himself from any voting process involving the firm

Violation of N.J.S.A. 18A:12-24.1 (b) / Prohibited Acts

13. Mr. Morris’s actions in relation to the above-mentioned legal firm are a violation of the Code of Ethics for School Board Members, N.J.S.A. 18A:12-24.1 (b) , which clearly states:

“No school official shall use or attempt to use his official position to secure unwarranted privileges, advantages or employment for himself, members of his family or others”

14. Mr. Morris’s persistent attempts to facilitate the hiring process for the “Souder, Shabazz & Woolridge Law Group”, using his official position as a JCBOE trustee, provide the group with an unwarranted advantage in seeking employment.

Violation of N.J.S.A. 18A:12-24.1 (e) Code of Ethics for School Board Members

15. Additionally, N.J.S.A. 18A:12-24.1 (e) states:

“I will recognize that authority rests with the board of education and will make no personal promises nor take any private action that compromises the board”

16. Mr. Morris’s personal meetings with the “Souder, Shabazz & Woolridge Law Group” and public acknowledgements of this fact indicate a “personal promise and/or private action” that compromises the board

Date of occurrence:

- **November 14, 2023 through February 26, 2024**

I assert this to be a violation of:

- **N.J.S.A. 18A:12-24.1 (b) / Prohibited Acts**
- **N.J.S.A. 18A:12-24.1 (e) Code of Ethics for School Board Members**

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:

2/27/2024

Signature of Complainant or his or her Attorney

Natalie I. [Signature]

CERTIFICATION UNDER OATH

(Name of Complainant), 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. I will advise the School Ethics Commission if I subsequently become aware that it is pending elsewhere.

Date:

2/27/2024

Signature of Complainant:

Natalie L. [Signature]

Sworn and subscribed to before me this 27th day of February, 2024.

LUIS A LAING JR.
Notary Public, State of New Jersey
My Commission Expires Mar 11, 2027

Notice: All final decisions issued in connection with complaints that come before the School Ethics Commission for review and determination are public records uniformly posted on the Department of Education's website at HYPERLINK "<http://www.nj.gov/education/legal/>" <http://www.nj.gov/education/legal/>. As a general rule, selective requests to remove a particular decision for reasons of personal preference are not entertained.

For Agency Use Only

Docket Number: _____