



NICHOLAS CELSO, III
OF COUNSEL
NCELSD@BUSCHLAWGROUP.COM

July 10, 2025

VIA E-Filing

Hon. Andrea I. Marshall, J.S.C.
Monmouth County Courthouse
71 Monument Street
Freehold, NJ 07728

RE: Board of Education of the Borough of Red Bank v. Red Bank Charter School
Docket No.: MON-L-1843-25

Dear Judge Marshall:

On behalf of Plaintiff, the Board of Education of the Borough of Red Bank (also referred to as the “Board”), kindly accept this letter in reply to Defendant, the Red Bank Charter School’s (also referred to as “RBCS”) “corrected” opposition, filed with this Court on July 1, 2025. Succinctly stated, Defendant’s response is a conglomeration of preposterous, previously failed accusations, irrelevant information about RBCS, and self-serving, inflated recitations about the outcome of prior litigation between the parties that includes a lengthy reiteration of the language of the Consent Order which plainly speaks for itself; an unabashed insistence on its right to resort to self-help in open defiance of the subject Consent Order, and an illegitimate and untimely attempt to involve this Court in re-litigation of the underlying substantive issues over which it lacks subject matter jurisdiction. As such, for the reasons stated more fully herein and in the Board’s initial Brief filed in support of this application, the Board’s Application should be granted and Defendant should be ordered to comply with the Consent Order.

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STATEMENT OF FACTS AND PROCEDURAL HISTORY

Plaintiff relies on its initial brief in support of its Verified Complaint and the Certifications submitted therewith, filed with this Court on May 15, 2025, as supplemented herein. Defendant's initial Opposition to the Order to Show Cause was filed on June 30, 2025, followed on July 1, 2025 by a "corrected" filing. The Commissioner of Education was dismissed without prejudice by way of a Stipulation of Dismissal, filed on June 30, 2025, stating that the Commissioner takes no position on Plaintiff's application. The Board's Reply to Defendant, RBCS, follows.

PRELIMINARY STATEMENT

It will be immediately apparent to Your Honor that Defendant continues to hurl unfounded and repeatedly failed accusations against the Board, cavalierly claiming that Plaintiff, "In a lack of candor to this Court. . . masks the utility [of] the waitlist afforded to the District. The District used the waitlist information to chill Red Bank family interest in enrollment at RBCS" (Defendant's brief ("Db") at 2-3). Further, Defendant points to the Exhibits A (¶4) and B (¶3), annexed to the Certification of Thomas Johnston, Esq., to show that the issue regarding the provision of waitlists arose in or about 2017 to contradict the assertion of the Board's Superintendent, Dr. Jared Rumage, that it was not until the 2021-2022 school year that Defendant first refused to supply waitlist information. (Certification of Dr. Jared Rumage, filed 5/15/25, at ¶12). Defendant states that Dr. Rumage falsely stated that RBCS had complied with its obligation to supply the waitlists until the 2021-2022 school year (Db at 9, fn. 3). Although it is true that the controversy between the parties concerning the waitlists arose in 2017, it is equally true that Defendant continued to provide the wait lists until 2021-2022. (Please see the accompanying

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Supplemental Certification of Dr. Jared Ramage and Ex. A annexed thereto). Finally, Defendant asserts that because Plaintiff did not accept its offer to formulate a Memorandum of Understanding for the reasons set forth in Ex. C. of the Johnston Cert., that Defendant's obligations under the Consent Order were *ipso facto* eliminated and it was entitled to ignore them going forward without seeking relief from the Commissioner or a court.

However, even the most cursory review of Defendant's afore mentioned Exhibit B, as well as its present submission to this Court, demonstrates that Defendant persists in its belief that it is entitled to ignore the Commissioner's Final Decision affirming the Consent Order without seeking relief from its obligations by attempting to justify its actions by voicing unproven accusations which have fallen on deaf ears before both the Office of Civil Rights and the Appellate Division and have never been raised before the Commissioner of Education in the form of a Petition of Appeal within the applicable time limits. Now, once again, Defendant seeks to raise its allegations of civil rights violations before this Court by bootstrapping them to Plaintiff's present action for enforcement of the Consent Order. But, because Plaintiff is entitled to the continued enforcement of the Consent Order, both because Defendant's accusations are without merit and because, even if true, Plaintiff would still be entitled to enforcement of the still-valid Consent Order and Final Judgment, this Application should be granted.

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LEGAL ARGUMENT

I. PLAINTIFF'S ACTION IS NOT TIME BARRED

Plaintiff's Verified Complaint in this matter was timely and properly filed in this Court. Defendant conflates the Plaintiff's application for enforcement of the Commissioner's Decision with adjudication of the underlying school law issues. However, contrary to Defendant's claim (Db at 14), school law issues and disputes are not at issue here. The 90-day period of limitations set forth in N.J.A.C. 6A:3-1.3(i) does not apply to the present matter. That provision would apply if and only if Plaintiff wished to challenge the Consent Order, not to seek to enforce it. (As discussed below, it is Defendant who is barred by the regulation from making the arguments it includes in its Opposition, in that Defendant attempts to dismiss Plaintiff's request for enforcement in part by challenging Plaintiff's use of the waitlists.)

Plaintiff did not sit on its rights. It repeatedly tried to work with Defendant to rectify the problem and, as indicated, did receive waitlists for the entire period from 2008-2009 through 2020-21, although not in complete conformity with the time periods set forth in the Consent Order. (see accompanying July 8, 2025 Supplemental Cert. of Dr. Jared Ramage; see also, May 15, 2025 Cert. of Dr. Ramage ¶¶16 and 17). As explained by Dr. Ramage, when the parties became embroiled in the latest round of litigation which again included the often repeated accusations of civil rights violations regarding the Plaintiff's use of the waitlists, he understood that he needed to defer any further action until the Appellate Division ruled (see R. 4:67-6(c)(2) prohibiting enforcement actions when matter is pending before the Appellate Division). Once the Appellate Division ruled, Dr. Ramage made one last request and then proceeded with the present application to this Court

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when it became apparent that Defendant was continuing to refuse to supply any waiting list at all. (May 15, 2025 Cert. of Dr. Ramage, at ¶¶21 -23).

Assuming arguendo that the 90-day rule does apply, which is denied, it is mitigated by the well-established, continuing violation doctrine. "The 'continuing tort doctrine,' also known as the 'continuing violation doctrine,' provides that when an individual is subjected to a 'continual, cumulative pattern of tortious conduct, the statute of limitations period begins only when the wrongful action ceases." Wreden v. Twp. of Lafayette, 436 N.J. Super. 117, 125 (App. Div. 2014) (quoting Wilson v. Wal-Mart Stores, 158 N.J. 263, 272 (1999)). When a court finds that a continuing tort has been committed, "[i]t implicitly holds that the defendant is committing a new tort, including a new breach of duty, each day, triggering a new statute of limitations." Russo Farms, Inc., 144 N.J. 84, 99 (1996). The doctrine is not limited only to torts and has been extended to multiple causes of action, including contract disputes. (see, e.g., Medley v. Atlantic Exposition Services, Inc., 550 F.Supp.3d 170 (D.N.J. 2021)).

As discussed above, Defendant's refusal to submit a waitlist occurred on May 22, 2023 (see May 15, 2025 Ramage Cert., Ex. E annexed thereto). Defendant unabashedly admits its defiance of the Consent Order continues to this day, clearly triggering new 90-day periods of limitations with each new failure to submit the waitlist. More specifically, the most recent failure to provide a waitlist by May 15, 2025, triggers a new 90-day period. As a result, Plaintiff's application is timely, whether a ninety (90) day or longer limitation applies. But, as discussed below, the rule does not apply because the present action is not subject to the jurisdiction of the Commissioner.

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II. THE COMMISSIONER DOES NOT HAVE PRIMARY JURISDICTION OVER THE PRESENT MATTER

Although it is true that the Commissioner of Education has primary jurisdiction over controversies and dispute arising under the School Laws, it is not true, as Defendant asserts (Db at 16) that “the issues here concern compliance with school regulations about the registration and enrollment of children in a charter school, . . . admission practices, . . . waitlist compliance, . . . among other school laws.” (Db at 16). In fact, the only issue before this Court is Defendant’s outright refusal to comply with the Consent Order previously approved by the Commissioner of Education by providing the required waitlists. This is not a question of school law requiring specialized agency expertise, but rather simply one of willful defiance of the Consent Order. Rather than own up to its steadfast recalcitrance to comply, Defendant seeks to re-litigate other substantive issues (*Ibid.*) that either have been decided or otherwise determined, and for which it has not initiated a petition of appeal to the Commissioner within the 90-day period of limitation it so readily cites. Moreover, it asks this Court to consider its substantive allegations as a justification for its noncompliance, without filing a Notice of Motion or a Verified Complaint that would alter the terms and conditions of the Consent Order.

Defendant’s argument that Plaintiff’s present application pursuant to R. 4:67-6 is misplaced, (1) because the Consent Order was not entered in the District’s favor (Db at 17), and (2) because such action is limited only to a “judgment” which is not embodied in the Consent Order (Db at 18), is plainly without merit. In fact, R. 4:67-6 states that this action may be brought by a party in whose favor the order affords specific relief. The provision of the Consent Order

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requiring Defendant to provide the waitlist clearly provides specific relief to the Plaintiff. Moreover, the notion that the present action is ill-founded because it does not involve a judgment manifests a strained interpretation of both the Agency's regulation, N.J.A.C. 6A:3-3.1(b), and R. 4:67-6.

Defendant wants this Court to conclude that the provision in N.J.A.C. 6A:3-3.1(b) directing parties to utilize R. 4:67-6 to seek court enforcement of judgments disqualifies Plaintiff from its present course of action because it embodies a settlement. However, Defendant ignores the statement by the Commissioner that, "Because this agency is a party to the present case, the settlement – pursuant to N.J.A.C. 1:1-19(c) and (d) is deemed to be the final decision in this matter. (May 15, 2025 Cert. of Dr. Ramage, Ex. A, annexed thereto). Adopting the Consent Order as a final decision elevates it to more than a mere settlement, as is evidenced by N.J.A.C. 6A:4-1.3, which makes final Commissioner decisions appealable to the Appellate Division of the Superior Court. Defendant's limited reading of the Agency Regulation is further constrained by R. 4:67-6(a), which plainly states "a written order **or determination** . . . affording that party specific relief" is a proper subject of a motion to enforce (emphasis added). Finally, and of crucial significance, is the fact that even if Plaintiff had filed a petition of appeal with the Commissioner and prevailed, the Commissioner is without authority to enforce his order, which enforcement would have to proceed under R. 4:67-6, as in the present action by Plaintiff. Thus, adopting Defendant's version of the proper course of action would result in a needless circularity and waste of time and resources.

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III. THE ALLEGATION THAT PLAINTIFF IS TARGETING HISPANIC FAMILIES TO SUPPRESS THEIR ENROLLMENT AT RED BANK CHARTER SCHOOL IS NOT PROPERLY BEFORE THIS COURT.

Defendant improperly attempts to re-litigate its previously failed attempts to impugn Plaintiff's use of waitlist information by alleging a preposterous civil rights violation. Initially, it is noteworthy that nothing in the Consent Order circumscribes Plaintiff's utilization of the waitlist information. Therefore, this Court could not act in any fashion to compel Plaintiff to use the information in one way or another, because doing so would act as a modification of the Consent Order, which modification is expressly prohibited by R. 4:67-6(c)(3). Thus, Defendant unleashes an ongoing barrage of alleged civil rights violation in a transparent effort to gain this Court's approval of its violation of the Consent Order. As explained in Plaintiff's brief in support of its Verified Complaint in this matter, filed May 15, 2025, the argument presented by Defendant is little more than a regurgitation of that previously raised before the Commissioner of Education, the U.S. Department of Education Office of Civil Rights and the Appellate Division, none of which resulted in an type of ruling or modification regarding Defendant's obligation to provide periodic waitlists on a regular basis. In any case, the Court should ignore Defendant's argument in its entirety, as it seeks adjudication of substantive issues that should be raised by way of a separate complaint in the proper forum and not in opposition to Plaintiff's present application to this Court. Defendant's allegations do not warrant a further response, as they are not relevant to the present matter and are not properly before this Court.

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IV. THE DISTRICT HAS NOT FAILED TO ABIDE BY ITS OBLIGATIONS UNDER THE CONSENT ORDER AND RBCS IS NOT RELIEVED OF ITS OBLIGATIONS THEREUNDER

Again, Defendant's arguments under this point heading are both procedurally and substantially infirm. Defendant asserts that Plaintiff's alleged failure to provide student demographic data to RBCS constitutes a material breach, giving it a right to unilaterally terminate its obligations. (Db at 24). Ironically, in virtually the same breath, Defendant proceeds to argue that its obligations under the Consent Order have been superseded by subsequent legal and regulatory developments. (*Ibid.*) Defendant correctly points out that the student demographic data it alleges the Plaintiff has failed to provide is now readily available online. (*Ibid.*) Notably, however, Defendant fails to point to any new source of information for the subject waitlists. Thus, even assuming *arguendo* that the availability of online data somehow mitigates certain aspects of the Consent Order, which is denied, Defendant fails to provide any evidence that such is the case with respect to the information contained in the waitlists, which can only be obtained directly from Defendant.

V. THE DISTRICT HAS NOT BREACHED THE COVENANT OF GOOD FAITH AND FAIR DEALING

Nothing in the Consent Order precludes the Plaintiff from voicing its legitimate objections to the renewal of Defendant's Charter subsequent to the Order, despite Defendant's protestations to the contrary. Indeed, the Order explicitly states: "The entry of this Consent Order shall only be dispositive of the issues relating to this matter (which solely concerned the 2021 renewal of Defendant's charter) and shall neither restrict nor prejudice in any way, the rights of the parties to

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pursue against each other any legal action with respect to any claim or violation of law, rule or regulation. (Consent Order, at ¶14). The remand was intended to resolve issues related to the 2021 renewal application, primarily the issue regarding Plaintiff's accusation of segregative impact caused by Defendant's practices. One of the remedies afforded by the Consent Order as a data source for Plaintiff's use was the provision of the waitlists (see Verified Complaint, ¶17). In the absence of Defendant's compliance with the required provision of periodic waitlists, a major component of the resolution of the underlying substantive dispute was disabled, shattering the consideration upon which the Consent Order was predicated. It will not escape Your Honor's awareness that the bulk of the provisions set forth in the Consent Order are intended to ensure that Plaintiff receives the information it needs to ensure that the Charter School is not exacerbating student segregation. The Order is overwhelmingly drafted with the intent to provide needed information and assurances to Plaintiff.

The notion that Plaintiff has breached its duty of fair dealing by insisting that it receive the information for which it bargained and then seeking judicial relief to obtain it is wholly without merit. If any party is guilty of unfair dealing, it is the Defendant, which continues to engage in a dilatory and non-compliant course of action marred by ongoing, unfounded aspersions of a purported civil rights violation with which no agency or court has thus far agreed.

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CONCLUSION

For all of the foregoing reasons, Defendant should be directed immediately to comply with its obligations to timely provide waitlists to the Plaintiff, as required by the Consent Order.

Respectfully Submitted,

THE BUSCH LAW GROUP, LLC

By: 
Nicholas Celso III

Cc: Thomas Johnston, Esq., Counsel for Defendant Red Bank Charter School
(Via E-Courts Only)

The Busch Law Group LLC
Nicholas Celso III, Esq. (015641984)
Aron Mandel, Esq. (085242013)
450 Main Street
Metuchen, New Jersey 08840
(732) 243-9588
Attorneys for the Board of Education of
the Borough of Red Bank

BOARD OF EDUCATION OF THE
BOROUGH OF RED BANK,

Plaintiff,

RED BANK CHARTER SCHOOL
AND COMMISSIONER OF
EDUCATION OF THE STATE OF
NEW JERSEY,

Defendants.

SUPERIOR COURT OF NEW JERSEY
MONMOUTH COUNTY
Docket No.:

Civil Action

Motion for Summary Proceeding to Enforce
Agency Order, pursuant to *Rule* 4:67-6

SUPPLEMENTAL CERTIFICATION OF DR. JARED RUMAGE

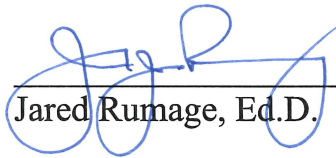
I, Dr. Jared Rumage, certify as follows:

1. I am employed by the Red Bank Borough Board of Education as Superintendent of Schools of the Red Bank Borough Public School District (“Board”).
2. I make this Supplemental Certification in response to the accusation set forth in the footnote 3, page 9 of the Letter Brief submitted by Thomas Johnston, Esq. on behalf of the Defendant and filed with this Court on July 1, 2025.
3. Therein, Mr. Johnston asserts that I falsely stated that RBCS complied with its obligation to supply waiting lists until the 2021-2022 school year.

4. In point of fact, RBCS did supply waiting lists for the 2008-2009 school year through 2020-2021, although not necessarily in a timely fashion, until it refused to continue to do so in 2021-2022.
5. I have attached the waitlist information provided to us for the above time period as Exhibit A, annexed hereto.
6. In most cases I have provided the transmittal correspondence from RBCS and not the wait lists themselves which are lengthy (these will be provided if the Court so requests), although for certain years for which we could not locate the transmittal letter, I excerpted a portion of the actual waiting list with the names of the students redacted.
7. The final document is for the 2020-21 school year and is the last we received.

I certify that the foregoing statements made by me are true and accurate to the best of my knowledge and belief and if willfully false that I am subject to punishment.

Dated: July 8, 2025



Jared Rumage, Ed.D.

**EXHIBIT A IN SUPPORT OF SUPPLEMENTAL CERTIFICATION
OF DR. JARED RUMAGE**

OCT-20-2008 09:28

MC OMBER MC OMBER

P.05/15



Meredith Pennotti, Principal

58 Oakland St. • Red Bank, New Jersey 07701

(732).450.2092 • (732).936.1923

October 17, 2008

Ms. Laura Morana
Superintendent of Schools
Red Bank Borough Schools
76 Branch Avenue
Red Bank, New Jersey 07701

Dear Ms. Morana,

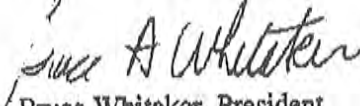
Enclosed is the most current Waiting List for Red Bank Charter School for 2008-2009 which reflects applications through October 1. On preliminary review, the district of residence for all students on the list is Red Bank. Complete proof of residence is processed per Red Bank Borough Board of Education requirements when the child is offered a seat in the school.

We forward this information in compliance with the Consent Order established between the Red Bank Borough Board of Education and the Red Bank Charter School Board of Trustees. It is our understanding that this list is to be provided to the Red Bank Borough Superintendent of Schools for your review.

Please do not hesitate to contact me if you have any questions.

Sincerely,


Meredith S. Pennotti, Principal


Bruce Whitaker, President
Board of Trustees



Meredith Pennotti, Principal

58 Oakland St. ■ Red Bank, New Jersey 07701

(732).450.2092 ■ (732).936.1923

January 15, 2010

Dr. Laura Morana
Superintendent of Schools
Red Bank Borough Schools
76 Branch Avenue
Red Bank, New Jersey 07701

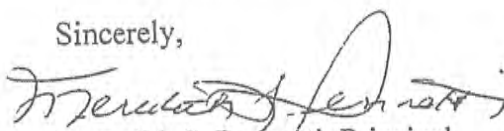
Dear Dr. Morana,

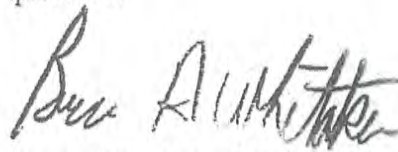
Enclosed is the most current Waiting List for Red Bank Charter School for school year 2010-2011. On preliminary review, the residence for all students on the list is Red Bank. Complete proof of residence is processed per Red Bank Borough Board of Education requirements when the parents register the child in the district.

We forward this information to comply with the Consent Order established between the Red Bank Borough Board of Education and the Red Bank Charter School Board of Trustees. At Red Bank Charter School, Wait List information remains confidential until a child is formally enrolled in the school.

Please do not hesitate to contact me if you have any questions.

Sincerely,


Meredith S. Pennotti, Principal


Bruce Whitaker, President
Board of Trustees



Meredith Pennotti, Principal

58 Oakland St. ■ Red Bank, New Jersey 07701

(732).450.2092 ■ (732).936.1923

January 18, 2011

Dr. Laura Morana, Superintendent
Red Bank Borough Schools
76 Branch Avenue
Red Bank, NJ 07701

Dear Laura,

On January 13, 2011, Red Bank Charter School conducted the annual lottery. Enclosed please find the enrollment from the initial recruitment period for the 2011-2012 school year and the most current wait list for the school year 2011-2012. The wait list information remains confidential until a child is formally enrolled in the school.

Our incoming Kindergarten information dinner is scheduled for February 17. If it is your continued preference, we could distribute the registration packets at this meeting. Please contact Michelle Fogerty in our office to advise her on this.

Sincerely,

A handwritten signature in black ink, appearing to read "Meredith Pennotti". The signature is fluid and cursive, with a large, stylized "M" and "P".

Meredith Pennotti

P.S. Thanks for your leadership with the superintendent's group. I appreciate and support the efforts on Carole's behalf.



Meredith Pennotti, Principal

58 Oakland St. ■ Red Bank, New Jersey 07701

(732).450.2092 ■ (732).936.1923

January 17, 2012

Dr. Laura Morana, Superintendent
Red Bank Borough Schools
76 Branch Avenue
Red Bank, NJ 07701

Dear Laura,

On January 11, 2012 Red Bank Charter School conducted the annual lottery. Enclosed please find the enrollment from the initial recruitment period for the 2012-2013 school year and the most current wait list for the school year 2012-2013. The wait list information remains confidential until a child is formally enrolled in the school.

Our incoming Kindergarten information dinner is scheduled for February 2, 2012. If it is your continued preference, we could distribute the registration packets at this event. Please contact Michelle Fogerty in our office to advise her on this.

Sincerely,

A handwritten signature in black ink, appearing to read 'Meredith Pennotti', is written over a horizontal line.

Meredith Pennotti



Meredith Pennotti, Charter School Administrator
Ida West-Jones, Director of Curriculum &
Instruction

58 Oakland St. ■ Red Bank, New Jersey 07701
(732).450.2092 ■ (732).936.1923

January 15, 2013

Dr. Laura Morana, Superintendent
Red Bank Borough Schools
76 Branch Avenue
Red Bank, NJ 07701

Dear Laura,

On January 10, 2013 Red Bank Charter School conducted the annual lottery. Enclosed please find the enrollment from the initial recruitment period for the 2013-2014 school year and the most current wait list for the school year 2013-2014. The wait list information remains confidential until a child is formally enrolled in school.

If it is your continued preference, we could distribute the registration packets to our incoming families. We would need them for our orientation meeting on January 31, 2013.

Sincerely,

A handwritten signature in cursive script, appearing to read "Meredith Pennotti", is written over a printed name.

Meredith Pennotti



Meredith Pennotti, Charter School Administrator
Ida West-Jones, Director of Curriculum & Instruction

58 Oakland St. ■ Red Bank, New Jersey 07701

(732).450.2092 ■ (732).936.1923

www.redbankcharterschool.com

January 17, 2014

Mr. Harold Reid, Interim Superintendent
Red Bank Borough Schools
76 Branch Avenue
Red Bank, NJ
07701

Dear Harold,

On January 9, 2014 Red Bank Charter School conducted the annual lottery. Enclosed is most current wait list for the school year 2014-2015. The wait list information remains confidential until a child is formally enrolled in school.

If it is your continued preference, we could distribute the registration packets to our incoming families. We would need them for our orientation meeting on January 31, 2014.

Sincerely,

Meredith Pennotti



Meredith Pennotti, Charter School Administrator
Ida West-Jones, Director of Curriculum &
Instruction
www.redbankcharterschool.org

58 Oakland St. ■ Red Bank, New Jersey 07701
(732).450.2092 ■ (732).936.1923

December 8, 2015

Jared Ramage, Ed. D.
Superintendent of Schools
Red Bank Borough Public Schools
76 Branch Avenue
Red Bank, NJ 07701


Dear Dr. Ramage:

Enclosed is a copy of the letter sent to your board office for the ASSA collection of October 30, 2015 that includes the requested information of students, grade, gender, ethnicity and economic status. As a point of reference, much of the Consent Order of March 2007 predates data collection tools now used by the Department of Education, specifically, NJSMART and the Genesis Student Information System. Many of the conditions of the order are met and verified using these required reporting systems.

Also, enclosed is a copy of the current wait list for the school year 2015-2016. This list must be kept confidential in your office. Please realize these are not our students and we have no authorization from parents to release this information. Previously, parents were approached regarding their application to the Charter. This behavior must be strongly discouraged.

I am certain you appreciate the complexity of this position. Please let me know if you need anything additional.

Sincerely,



Meredith Pennotti

RECEIVED

DEC 10 2015

Red Bank Borough S.O.E.
SUPERINTENDENT'S OFFICE



Meredith Pennotti, Charter School Administrator
Ida West-Jones, Director of Curriculum & Instruction

58 Oakland St. ■ Red Bank, New Jersey 07701
(732).450.2092 ■ (732).936.1923
www.redbankcharterschool.com

October 25, 2016

Dr. Jared Rumage, Superintendent
Red Bank Borough Schools
76 Branch Ave
Red Bank, NJ 07701

Dear Dr. Rumage:

Enclosed is the most current Wait List for Red Bank Charter School for year 2016-2017. We are forwarding this information to comply with the Consent Order.

The Wait List information remains confidential until a child is formally enrolled in the school.

Sincerely,

A handwritten signature in blue ink, appearing to read "Meredith S. Pennotti".

Meredith S. Pennotti, M.S. Ed

RECEIVED

OCT 25 2016

Red Bank Borough B.O.E.
SUPERINTENDENT'S OFFICE



Meredith Pennotti, Charter School Administrator
Ida West-Jones, Curriculum Coordinator

58 Oakland St. ■ Red Bank, New Jersey 07701
(732).450.2092 ■ (732).936.1923

October 13, 2017

Dr. Jared Ramage, Superintendent
Red Bank Borough Schools
76 Branch Ave
Red Bank, NJ 07701

Dear Dr. Ramage:

Enclosed is the most current Wait List for Red Bank Charter School for year 2017-2018. We are forwarding this information to comply with the Consent Order.

Wait List information should remain confidential in the office of the superintendent until a child is formally enrolled in the Red Bank Charter School..

Sincerely,

A handwritten signature in black ink, appearing to read 'Meredith S. Pennotti', is written over a horizontal line.

Meredith S. Pennotti, M.S. Ed

Red Bank Charter School 2017-2018 Waitlist

1/15/2018

GRADE	WaitLIST#	LAST NAME	FIRST NAME
K	1	S	der
K	2	M	
K	3	J	
K	4	R	
K	5	T	
K	6	M	
K	7	A	
K	8	B	
K	9	C	er
K	10	W	
K	11	F	
K	12	A	r
K	13	T	
K	14	W	te
K	15	C	n
K	16	M	th
K	17	R	
K	18	W	
K	19	C	
K	20	M	
K	21	J	

First Name	Last Name	Waitlist Number	Current School	Current Grade
V	[REDACTED]	PK	Red Bank	
G	[REDACTED]	PK	Red Bank	
M	[REDACTED]	PK	Red Bank	
Jc	[REDACTED]	K	Red Bank	
H	[REDACTED]	K	Red Bank	
T	[REDACTED]	K	Red Bank	
R	[REDACTED]	K	Red Bank	
P	[REDACTED]	K	Red Bank	
K	[REDACTED]	K	Red Bank	
L	[REDACTED]	K	Red Bank	
M	[REDACTED]	K	Red Bank	
M	[REDACTED]	K	Red Bank	
G	[REDACTED]	K	Red Bank	
R	[REDACTED]	K	Red Bank	
H	[REDACTED]	K	Red Bank	
G	[REDACTED]	K	Red Bank	
A	[REDACTED]	1	Red Bank	
C	[REDACTED]	1	Red Bank	
Jc	[REDACTED]	1	Red Bank	
C	[REDACTED]	1	Red Bank	
C	[REDACTED]	1	Red Bank	
V	[REDACTED]t	1	Red Bank	
G	[REDACTED]	1	Red Bank	
M	[REDACTED]	1	Red Bank	
R	[REDACTED]	1	Red Bank	
C	[REDACTED]	2	Red Bank	
Ir	[REDACTED]	2	Red Bank	
H	[REDACTED]	2	Red Bank	
H	[REDACTED]	2	Red Bank	
C	[REDACTED]er	2	Red Bank	
M	[REDACTED]	2	Red Bank	
B	[REDACTED]	4	Red Bank	
Jc	[REDACTED]	4	Red Bank	
C	[REDACTED]	4	Red Bank	
H	[REDACTED]	4	Red Bank	
G	[REDACTED]	4	Red Bank	
W	[REDACTED]	4	Red Bank	
H	[REDACTED]	4	Shrewbury*	
G	[REDACTED]	5	Red Bank	
C	[REDACTED]	5	Red Bank	
G	[REDACTED]	5	Red Bank	
O	[REDACTED]	5	Red Bank	
T	[REDACTED]	5	Red Bank	
M	[REDACTED]	5	Red Bank	
G	[REDACTED]	5	Red Bank	
C	[REDACTED]	5	Red Bank	
D	[REDACTED]	5	Holmdel*	
O	[REDACTED]	5	Red Bank	
H	[REDACTED]	6	Red Bank	
G	[REDACTED]	6	Red Bank	
D	[REDACTED]	6	Shrewbury*	
G	[REDACTED]	6	Red Bank	
D	[REDACTED]	7	Holmdel*	

* if a seat were to become available, these student would have to provide current residency or they would be denied.

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