



STATE OF NEW JERSEY

In the Matter of Maibis Puente Leon,
Essex County, Sheriff's Office

**FINAL ADMINISTRATIVE ACTION
OF THE
CIVIL SERVICE COMMISSION**

CSC Docket No. 2024-1844
OAL Docket No. CSR 04946-24

ISSUED: NOVEMBER 27, 2024

The appeal of Maibis Puente Leon, Sheriff's Officer, Essex County Sheriff's Office, removal, effective January 2, 2024, on charges, was heard by Administrative Law Judge Daniel J. Brown (ALJ), who rendered his initial decision on October 24, 2024. No exceptions were filed.

Having considered the record and the ALJ's initial decision, and having made an independent evaluation of the record, the Civil Service Commission (Commission), at its meeting on November 27, 2024, adopted the ALJ's Findings of Facts and Conclusions and his recommendation to uphold the removal.

The Commission makes the following comment. The ALJ's decision in this matter regarding both the charges and the penalty imposed is thorough and comprehensive. The Commission, therefore, affirms the initial decision in its entirety.

ORDER

The Civil Service Commission finds that the action of the appointing authority in removing the appellant was justified. The Commission therefore upholds that action and dismisses the appeal of Maibis Puente Leon.

This is the final administrative determination in this matter. Any further review should be pursued in a judicial forum.

DECISION RENDERED BY THE
CIVIL SERVICE COMMISSION ON
THE 27TH DAY OF NOVEMBER, 2024

Allison Chris Myers

Allison Chris Myers
Chairperson
Civil Service Commission

Inquiries
and
Correspondence

Nicholas F. Angiulo
Director
Division of Appeals and Regulatory Affairs
Civil Service Commission
P.O. Box 312
Trenton, New Jersey 08625-0312

Attachment



State of New Jersey
OFFICE OF ADMINISTRATIVE LAW

INITIAL DECISION

OAL DKT. NO. CSR 04946-24

**IN THE MATTER OF MAIBIS PUENTE LEON,
ESSEX COUNTY SHERIFF'S OFFICE.**

Maibis Puente Leon, appellant, pro se

Jennifer A. Cacchioli, Assistant County Counsel, for respondent Essex County
Department of Corrections (Jerome S. St. John, Essex County Counsel,
attorney)

Record Closed: September 10, 2024

Decided: October 24, 2024

BEFORE **DANIEL J. BROWN**, ALJ:

STATEMENT OF THE CASE

Appellant did not complete the required pre-academy physical conditioning assessment or basic police training class within one year of her appointment. Should appellant be removed from her position as a sheriff's officer? Yes. Under N.J.A.C. 4A:2-2.3(a)(3), a police officer who is a new hire and who has demonstrated an inability to perform the duties of the position, or who has demonstrated that they will be ineligible for Commission certification, for unacceptable behavior, or for other good cause may be subject to removal.

PROCEDURAL HISTORY

On January 8, 2024, respondent served appellant with a Preliminary Notice of Disciplinary Action (PNDA). In its notice, respondent charged appellant with incompetency, inefficiency or failure to perform duties in violation of N.J.A.C. 4A:2-2.3(a)(1); inability to perform duties in violation of N.J.A.C. 4A:2-2.3(a)(3); conduct unbecoming a public employee in violation of N.J.A.C. 4A:2-2.3(a)(6); being unfit for duty based upon a failure to complete a State mandated training requirement of N.J.A.C. 13:1-7.2(a)(8); and other sufficient cause in violation of N.J.A.C. 4A:2-2.3(a)(12).

In the PNDA, Respondent specified that on June 7, 2023, the Police Training Commission (PTC) granted petitioner a six-month extension to complete training at the police academy. That extension expired on December 7, 2023. Petitioner attempted but failed to complete a training assessment at the Monmouth County Police Academy on November 27, 2023. On December 18, 2023, the PTC notified respondent that appellant would not be issued a PTC license based upon her failure to complete the Basic Course for Police Officers. Appellant also failed to complete a makeup training assessment scheduled for December 27, 2023. The PTC requires all officers to complete the required basic training within one year of appointment.

Respondent further specified that appellant's failure to complete the Basic Course for Police Officers renders her unable to participate in the statutorily mandated training as set forth by the PTC in N.J.S.A. 52:17B-66 et. seq. Same makes the appellant ineligible for certification by the PTC and thus unable to hold the title and perform the duties of a sheriff's officer.

The PNDA sought appellant's removal from her employment, and appellant requested a departmental hearing.

Respondent conducted a departmental hearing on February 7, 2024, and the hearing officer rendered a decision on February 12, 2024.

A Final Notice of Preliminary Disciplinary Action (FNDA) dated February 16, 2024, sustained the charges of inability to perform duties in violation of N.J.A.C. 4A:2-2.3(a)(3); and being unfit for duty based upon a failure to complete a State mandated training requirement of N.J.A.C. 13:1-7.2(a)(8).

On March 1, 2024, appellant appealed the FNDA. However the Officer Appeal form was incorrect, making the appeal defective. The Civil Service Commission received the corrected officer appeal form on March 15, 2024.

On April 8, 2024, the Civil Service Commission transmitted the case to the Office of Administrative Law (OAL) under the Administrative Procedure Act, N.J.S.A. 52:14B-1 to -15, and the act establishing the OAL, N.J.S.A. 52:14F-1 to -23, for a hearing under the Uniform Administrative Procedure Rules, N.J.A.C. 1:1-1.1 to -21.6.

On June 6, 2024, I held a prehearing conference under N.J.A.C. 1:1-13.1 to discuss available dates for the hearing, the nature of the proceeding, and the issues to be resolved. I permitted additional time for discovery and I scheduled a hearing for July 31, 2024. I conducted a second prehearing conference on July 23, 2024. The parties appeared on the hearing date of July 31, 2024 and mutually requested an adjournment as they expected to reach a settlement agreement. Based upon the mutual request of the parties, I adjourned the July 31, 2024, hearing date. On August 26, 2024, I conducted a telephone conference with the parties to determine the status of settlement negotiations. When I learned that the matter was not going to be settled, I scheduled the hearing date for September 10, 2024. The hearing was held on that date. At the conclusion of the hearing on September 10, 2024, the record was closed.

FINDINGS OF FACT

Given the testimony the parties provided, together with my assessment of its credibility, and the documents the parties submitted, together with my assessment of their sufficiency, I **FIND** as follows:

Respondent's first witness was Captain John Rello. Rello testified that he works for respondent in the internal affairs division. As part of his job responsibilities, he secures placement of new officers into basic training classes at a police academy and the pre-academy physical fitness test that must be completed prior to a new officer's attendance at basic training classes at a police academy. Rello testified that appellant was hired by respondent as a sheriff's officer on March 22, 2022. At that time, she was assigned to the Courts. Captain Rello testified that because appellant was a new hire, appellant was required, under regulations established by the Police Training Commission (PTC) to complete a basic police training course or to be successfully enrolled in a basic police training course by January 1, 2024. Both respondent and appellant agree that appellant did not complete a basic police training class before January 1, 2024. The parties disagree concerning whether appellant was successfully enrolled in a basic police training class prior to January 1, 2024.

To be successfully enrolled in a basic police training class and to comply with PTC guidelines, a candidate for the police academy must pass a pre-academy physical conditioning assessment. The assessment consists of five components. The five components are a vertical jump test, a sit-up test, a three-hundred meter run, a push-up test, and a mile and a half run. To pass the assessment, a candidate must successfully complete all five components of the assessment at the time the assessment is given. The parties agree that, to date, appellant has not successfully completed the assessment. On November 17, 2022, appellant made her first attempt at completing the assessment. She passed the vertical jump but failed the sit-up test, three-hundred-meter run, the push-up test and the mile and a half run. Appellant was scheduled to retake the assessment on December 22, 2022. However, appellant did not take the retest on December 22, 2022. On December 15, 2022, appellant requested a deferment of the assessment because a member of her family was ill. That request was granted by respondent. Appellant then requested intermittent family leave because of the continued illness of her family member. Her request for intermittent family leave was approved by respondent and she was placed on that leave from March 24, 2023 to September 1, 2023. On May 12, 2023, appellant signed an acknowledgement that she was scheduled to attend a retake of the assessment on May 30, 2023. On May 22, 2023, appellant requested a deferment of the assessment because she had been on leave for a significant period of time. Respondent granted that

deferment and requested a six-month extension of training time for appellant from the PTC. On June 8, 2023, the PTC granted a six-month extension of training time to appellant, which would expire on December 7, 2023.

On November 16, 2023, appellant signed a notice that she was to attend a pre-academy physical conditioning assessment at the Essex County Police Academy (ECPA) on November 20, 2023. Captain Rello testified that he was contacted by the ECPA on November 17, 2023 and informed that appellant could not take her assessment at the ECPA because appellant was a former employee of the ECPA. Appellant was then scheduled to take the assessment at the Monmouth County Police Academy (MCPA) on November 22, 2023. On November 22, 2023, appellant failed the assessment again. She passed the vertical jump but failed the sit-up test, three-hundred meter run, push-up test and the mile and a half run.

Appellant was then scheduled to retake the assessment on December 18, 2023 at the MCPA. On December 16, appellant contacted Captain Rello by phone. Appellant told Captain Rello that she would not be able to take the assessment on December 18, 2023, as she tested positive for COVID. Captain Rello testified that PTC was contacted for guidance regarding appellant's status as appellant's training extension had expired on December 7, 2023. PTC advised that appellant would not be able to remain in her position as a sheriff's officer if she was not successfully enrolled in a police basic training class by January 1, 2024. Captain Rello testified that he was able to secure a spot for appellant in a basic training class at the MCPA which was scheduled to start on January 8, 2024. On December 26, 2023, appellant signed a notice indicating that she was to attend a pre-academy physical conditioning assessment at the MCPA on December 27, 2023. Appellant advised Captain Rello that she was unsure if she could get an appointment with her doctor to obtain medical clearance to participate in the assessment. Captain Rello assisted appellant in obtaining an appointment with a different doctor so that appellant could undergo a physical examination to determine if she was medically cleared to participate in the assessment. Following her physical examination, appellant was medically cleared to participate in the assessment on December 27, 2023. Appellant then was able to obtain an appointment with her personal physician. Appellant provided documentation that her personal physician did not medically clear her to participate in the

assessment on December 27, 2023. Therefore, appellant was not able to participate in the assessment. As appellant was not able to pass the assessment, she was not permitted to attend the January 8, 2024 basic police training class at the MCPA.

Respondent also called Lt. Oliveira as a witness. Lt. Oliveira testified that she works at the internal affairs division of the sheriff's office with Captain Rello. As part of her job, she was assigned to investigate the appellant's inability to pass a pre-academy physical conditioning assessment and appellant's failure to be successfully enrolled in a police academy class by January 1, 2024. Lt. Oliveira began her investigation on January 2, 2024. Ultimately, Lt. Oliveira concluded that because appellant was not enrolled in a basic training class for police officers on or before January 1, 2024, appellant could not obtain a valid PTC license and could not perform the duties of a sheriff's officer. Based on her investigation, Lt. Oliveira concluded that appellant could not continue to serve as a sheriff's officer.

Appellant testified on her own behalf at the hearing. Appellant acknowledged that she has not successfully completed a pre-academy physical conditioning assessment or basic police training at the police academy. Appellant explained that the delay was due to her extended intermittent family leave because of the illness of a family member. Appellant testified that she wanted to attend the assessment on December 27, 2023, but she was unable to do so because she was still suffering from the effects of COVID and she was taking steroids prescribed to her by her personal physician. Appellant argued that her removal was in error because, on December 5, 2023, Captain Rello enrolled her in the Monmouth County Police Academy class that was scheduled to begin on January 8, 2024.

In this case, I find the Captain Rello and Lt. Oliveira testified credibly and I give great weight to their testimony. Both Captain Rello and Lt. Oliveira testified that appellant was a good officer. Both Captain Rello and Lt. Oliveira testified that the only reason that they sought appellant's removal was that appellant had failed to pass pre-academy physical conditioning assessment and failed to be enrolled in basic police training at the police academy prior to January 1, 2024. Conversely, I do not find that appellant testified credibly and I do not give great weight to her testimony. As part of her testimony,

appellant repeatedly referenced a December 5, 2023, email from the MCPA stating that appellant had been enrolled in an academy class at the MCPA starting in January 2024. However, appellant failed to address what affect her failure to participate in the December 27, 2023, pre-academy physical conditioning assessment had on her enrollment status at the MCPA. Because she failed to participate in the December 27, 2023, pre-academy physical conditioning assessment, appellant had no ability to pass that assessment. Prior to that, appellant failed two separate pre-academy physical conditioning assessments at the MCPA. Each time appellant failed an assessment, the training officer of the MCPA sent Captain Rello a letter advising him of appellant's performance on the assessment. Each of those letters was admitted into evidence (R-8 and R-21), and contains the following paragraph:

If your candidate successfully passes all five components of the assessment re-take, they are then eligible to be enrolled in the BCPO class. However, if they fail one or more of the components again, regardless of whether it is the same component or not, they will not be permitted to re-take the assessment or be enrolled in the class.

Based upon the proceeding passage, I **FIND** that a candidate must pass the pre-academy physical conditioning assessment before that candidate is enrolled in an academy class. Because appellant did not pass the assessment on December 27, 2023, I **FIND** that she was not enrolled in the Monmouth County Police Academy class that was scheduled to begin on January 8, 2024.

DISCUSSION AND CONCLUSIONS OF LAW

The Charges

The Civil Service Act, N.J.S.A. 11A:1-1 to -12.6, governs a public employee's rights and duties. The Act is an important inducement to attract qualified personnel to public service and is liberally construed toward attainment of merit appointments and broad tenure protection. Essex Council No. 1, N.J. Civil Serv. Ass'n v. Gibson, 114 N.J. Super. 576 (Law Div. 1971), rev'd on other grounds, 118 N.J. Super. 583 (App. Div. 1972);

Mastrobattista v. Essex DOC Park Comm'n, 46 N.J. 138, 147 (1965). Governmental employers also have delineated rights and obligations. The Act sets forth that it is State policy to provide appropriate appointment, supervisory and other personnel authority to public officials so they may execute properly their constitutional and statutory responsibilities. N.J.S.A. 11A:1-2(b).

However, "there is no constitutional or statutory right to a government job." State-Operated Sch. Dist. of Newark v. Gaines, 309 N.J. Super. 327, 334 (App. Div. 1998). A civil service employee who commits a wrongful act related to his or her duties, or gives other just cause, may be subject to major discipline. N.J.S.A. 11A:2-6; N.J.S.A. 11A:2-20; N.J.A.C. 4A:2-2.2; N.J.A.C. 4A:2-2.3. The issues to be determined at the de novo hearing are whether the appellant is guilty of the charges brought against him and, if so, the appropriate penalty, if any, that should be imposed. See Henry v. Rahway State Prison, 81 N.J. 571 (1980); W. New York v. Bock, 38 N.J. 500 (1962). In this matter, respondent bears the burden of proving the charges against appellant by a preponderance of credible evidence. See In re Polk, 90 N.J. 550 (1982); Atkinson v. Parsekian, 37 N.J. 143 (1962).

Although administrative hearings follow a relaxed evidentiary standard, there must be substantial or sufficient, credible evidence in the record to support the charges. N.J.S.A. 52:14B-10(a); In re Taylor, 158 N.J. 644, 656-57 (1999). The evidence must be such as to lead a reasonably cautious mind to a given conclusion. Bornstein v. Metro Bottling Co., 26 N.J. 263 (1958). Therefore, I must "decide in favor of the party on whose side the weight of the evidence preponderates, and according to the reasonable probability of truth." Jackson v. Del., Lackawanna and W. R.R. Co., 111 N.J.L. 487, 490 (E. & A. 1933). For reasonable probability to exist, the evidence must be such as to "generate belief that the tendered hypothesis is in all human likelihood the fact." Loew v. Union Beach, 56 N.J. Super. 93, 104 (App. Div. 1959) (citation omitted). Preponderance may also be described as the greater weight of credible evidence in the case, not necessarily dependent on the number of witnesses, but having the greater convincing power. State v. Lewis, 67 N.J. 47 (1975). Credibility, or, more specifically, credible testimony, in turn, must not only proceed from the mouth of a credible witness, but it must be credible itself as well. Spagnuolo v. Bonnet, 16 N.J. 546, 554-55 (1954).

Incompetency, inefficiency or failure to perform duties has been held to consist of the failure of an employee to adhere to proper procedures. See Okosa v. Union County Human Serv., CSV 5279-99, Initial Decision, (July 20, 2000), modified, Merit Sys. Bd. (September 15, 2000) <<http://njlaw.rutgers.edu/collections/oal/>>.

The fundamental concept of the concept of the charge of inability to perform duties is that one should be able to perform the duties of the position. Briggs v. Department of Civil Service, 64 N.J. Super. 351, 356 (App. Div. 1960).

An employee who has demonstrated that he is unable to execute his job responsibility is subject to termination. See Klusaritz v. Cape May Cnty., 387 N.J. Super. (App. Div. 2006) (upholding removal of an accountant who was incapable of preparing a bank reconciliation and unsuitable for the job). Absence of judgment alone can be sufficient to terminate an employee in a sensitive position that requires the trust of the public in that judgment. See In re Hermann, 192 N.J. 19, 32 (2007) (DYFS worker without prior discipline terminated for waving a lit cigarette in the face of a five-year-old).

Respondent charged appellant with an inability to perform required duties because appellant failed to comply with regulations imposed by the PTC which required appellant and all other individuals seeking to become sworn law enforcement officers to be successfully enrolled in a basic police training course by January 1, 2024. See N.J.S.A. 52:17B-66 et. seq. I have already found that appellant was not enrolled in an approved basic police training class by January 1, 2024, because she was unable to pass the required pre-academy physical conditioning assessment on December 27, 2023. In making that finding, I have rejected the appellant's assertion that an email that she received in December 2023, confirming her enrollment in the January 8, 2024, MCPA class meant that she was enrolled in a basic police training class by January 1, 2024, as required by the Police Training Act. Appellant was unable to pass the required pre-academy assessment despite being given the benefit of over eighteen months and multiple chances to do so. Because appellant failed to pass the required pre-academy

physical assessment, she was not successfully enrolled in the January 8, 2024, MCPA class as of January 1, 2024.

Given my findings of fact, I **CONCLUDE** that a preponderance of the credible evidence exists that appellant demonstrated a consistent inability to perform her prescribed duty, in a manner that is minimally acceptable for her position as a sheriff's officer.

I further **CONCLUDE** that appellant's failure to pass the pre-academy physical assessment and be successfully enrolled in a basic police training class by January 1, 2024, rendered her ineligible to be certified as a sheriff's officer by the PTC.

Therefore, I **CONCLUDE** that a preponderance of the credible evidence exists that appellant displayed inability to perform duties in violation of N.J.A.C. 4A:2-2.3(a)(3).

Appellant was also charged with being unfit for duty based upon a failure to complete a State mandated training requirement of N.J.A.C. 13:1-7.2(a)(8). That regulation provides that a law enforcement unit, combination of law enforcement units, institution of higher learning or State or county government agency certified to operate a school is vested with the power, responsibility, and duty to dismiss a trainee who has demonstrated that they will be ineligible for Commission certification, for unacceptable behavior, or for other good cause. While I find that appellant was not going to be certified as a law enforcement officer by the PTC because she did not pass the pre-academy physical assessment and therefore was not successfully enrolled in a basic police training class by January 1, 2024, appellant's actions are addressed by the charge of "inability to perform duties". Thus, I **CONCLUDE** that a preponderance of credible evidence does **NOT** exist to support a separate violation for being unfit for duty based upon a failure to complete a State mandated training requirement of N.J.A.C. 13:1-7.2(a)(8).

Penalty

The next question is the appropriate level of discipline. A progressive discipline system has evolved in New Jersey to provide job security and protect employees from

arbitrary employment decisions. Progressive discipline is an appropriate analysis for determining the reasonableness of the penalty. See West New York v. Bock, 38 N.J. 500, 523–24 (1962). The question upon appellate review is whether such punishment is “so disproportionate to the offense, in the light of all the circumstances, as to be shocking to one’s sense of fairness. In re Carter, 191 N.J. 474, 484 (2007) (quoting In re Polk, 90 N.J. 550, 578, (1982) (internal quotes omitted)). Indeed, bypassing progressive discipline occurs only when the misconduct is severe, rendering the employee unsuitable for continuation in the position or when the application of progressive discipline would be contrary to the public interest. In re Herrmann, 192 N.J. 19, 33 (2007). For example, when the work involves public safety, and the misconduct causes a risk of harm to persons or property. Id.

Appellant had no sustained discipline until this case. Additionally, both witnesses for respondent testified that appellant was a good employee and the only reason removal was being sought was appellant’s inability to pass the required pre-academy physical assessment and appellant’s failure to be enrolled in an academy class by January 1, 2024. However, the charge of inability to preform required duties is a serious one and appellant’s inability to pass the pre-academy physical assessment despite having multiple opportunities to do so makes appellant ineligible for certification by the PTC. As a result, appellant is unable to hold the title and perform the duties of a sheriff’s officer.

For that reason, I **CONCLUDE** that termination is warranted based on the serious nature of the misconduct alone and absent a progressive discipline analysis.

ORDER

Given my findings of fact and conclusions of law, I **ORDER** that the charge of inability to perform duties against appellant be **SUSTAINED**, and respondent’s action terminating appellant be **AFFIRMED**.

I hereby **FILE** my initial decision with the **CIVIL SERVICE COMMISSION** for consideration.

This recommended decision may be adopted, modified or rejected by the **CIVIL SERVICE COMMISSION**, which by law is authorized to make a final decision in this matter. If the Civil Service Commission does not adopt, modify or reject this decision within forty-five days and unless such time limit is otherwise extended, this recommended decision shall become a final decision in accordance with N.J.S.A. 40A:14-204.

Within thirteen days from the date on which this recommended decision was mailed to the parties, any party may file written exceptions with the **DIRECTOR, DIVISION OF APPEALS AND REGULATORY AFFAIRS, UNIT H, CIVIL SERVICE COMMISSION, 44 South Clinton Avenue, PO Box 312, Trenton, New Jersey 08625-0312**, marked "Attention: Exceptions." A copy of any exceptions must be sent to the judge and to the other parties.

October 24, 2024

DATE



DANIEL J. BROWN, ALJ

Date Received at Agency:

October 24, 2024

Date Mailed to Parties:

October 24, 2024

dr

APPENDIX

Witnesses

For Appellant:

Maibis Puente-Leon

For Respondent:

John Rello

Helena Oliviera

Exhibits

For Appellant:

A-1 COVID Test Results

A-2 Certification and prescription from S. DeAlmeida

A-3 Certification from Dr. Khashab

A-4 N.J.A.C. 13:1-20.1a

A-5 Not in evidence

A-6 Email from Monmouth County Police Academy to Appellant dated December 5, 2023

For Respondent:

R-1 Preliminary Notice of Disciplinary Action, dated January 8, 2024

R-2 Recommendation for Disciplinary action dated January 2, 2024,

R-3 Notice of immediate suspension dated January 2, 2024

R-4 Decision of hearing officer dated February 12, 2024

R-5 Final Notice of Disciplinary Action, dated February 16, 2024

R-6 Internal Affairs report dated January 2, 2024.

R-7 Memorandum from Captain John Rello to Essex County Sheriff dated January 4, 2024

R-8 Memorandum from Monmouth County Police Academy to Captain John Rello dated November 17, 2022

- R-9 Letter from respondent to appellant dated November 21, 2022
- R-10 Administrative report from appellant to Sgt. Cintron dated December 15, 2022 regarding deferral request
- R-11 Personnel Order from Essex County Sheriff dated March 24, 2023
- R-12 Notice from respondent to appellant regarding Pre-Assessment Physical Fitness test scheduled for May 30, 2023
- R-13 Administrative report from appellant to Lt. Novak dated May 22, 2023 regarding deferral request
- R-14 Extension of training time request form dated May 18, 2023
- R-15 Letter from administrator of Police Training Commission dated June 8, 2023
- R-16 Letter from respondent to appellant dated October 11, 2023 regarding Pre-Assessment Physical Fitness test scheduled for November 20, 2023
- R-17 Notice from respondent to appellant regarding Pre-Assessment Physical Fitness test scheduled for November 20, 2023
- R-18 Notice from respondent to appellant regarding Pre-Assessment Physical Fitness test scheduled for November 22, 2023
- R-19 Notice from respondent to appellant regarding Pre-Assessment Physical Fitness test scheduled for November 27, 2023
- R-20 Medical Certification of Dr. Vecchione dated November 20, 2023
- R-21 Memorandum from Monmouth County Police Academy to Captain John Rello dated November 27, 2023
- R-22 Notice from respondent to appellant regarding Pre-Assessment Physical Fitness test scheduled for December 27, 2023
- R-23 Medical Certification of Dr. Vecchione dated December 26, 2023
- R-24 Medical Certification of Dr. Khashab dated December 26, 2023
- R-25 Personnel profile of appellant dated January 2, 2024
- R-26 N.J.S.A. 52:17B-67.1
- R-27 N.J.S.A. 52:17B-68
- R-28 N.J.S.A. 52:17B-69
- R-29 N.J.A.C. 13:1-8.1
- R-30 N.J.A.C. 13:1-10.1
- R-31 N.J.A.C. 13:1-10.7
- R-32 N.J.A.C. 13:1-11.8

