



State of New Jersey
GOVERNMENT RECORDS COUNCIL

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CHRIS CHRISTIE
Governor

KIM GUADAGNO
Lt. Governor

RICHARD E. CONSTABLE, III
Commissioner

FINAL DECISION

July 31, 2012 Government Records Council Meeting

James Katz, Esq.
(on behalf of Camden County Council 10)
Complainant

Complaint No. 2012-51

v.
NJ Civil Service Commission
Custodian of Record

At the July 31, 2012 public meeting, the Government Records Council (“Council”) considered the July 24, 2012 Findings and Recommendations of the Executive Director and all related documentation submitted by the parties. The Council voted unanimously to adopt the entirety of said findings and recommendations. The Council, therefore, finds that the Complainant’s initial OPRA request as well as the Complainant’s clarified request are invalid under OPRA because the requests are overly broad and/or unclear as they fail to name specifically identifiable government records and require research beyond the scope of a custodian’s duties pursuant to MAG Entertainment, LLC v. Division of Alcoholic Beverage Control, 375 N.J. Super. 534, 546 (App. Div. 2005), Bent v. Stafford Police Department, 381 N.J. Super. 30, 37 (App. Div. 2005), New Jersey Builders Association v. New Jersey Council on Affordable Housing, 390 N.J. Super. 166, 180 (App. Div. 2007), and Schuler v. Borough of Bloomsbury, GRC Complaint No. 2007-151 (February 2009). *See also* Toscano v. NJ Department of Labor, Division of Vocational Rehabilitation Services, GRC Complaint No. 2010-293 (March 2012), Elcavage v. West Milford Township (Passiac), GRC Complaint No. 2009-08 (April 2010), and Wolosky v. Township of Randolph (Morris), GRC Complaint No. 2010-244 (February 2012).

This is the final administrative determination in this matter. Any further review should be pursued in the Appellate Division of the Superior Court of New Jersey within forty-five (45) days. Information about the appeals process can be obtained from the Appellate Division Clerk’s Office, Hughes Justice Complex, 25 W. Market St., PO Box 006, Trenton, NJ 08625-0006. Proper service of submissions pursuant to any appeal is to be made to the Council in care of the Executive Director at the State of New Jersey Government Records Council, 101 South Broad Street, PO Box 819, Trenton, NJ 08625-0819.

Final Decision Rendered by the
Government Records Council
On The 31st Day of July, 2012

Robin Berg Tabakin, Chair
Government Records Council



I attest the foregoing is a true and accurate record of the Government Records Council.

Denise Parkinson Vetti, Secretary
Government Records Council

Decision Distribution Date: August 7, 2012

**STATE OF NEW JERSEY
GOVERNMENT RECORDS COUNCIL**

**Findings and Recommendations of the Executive Director
July 31, 2012 Council Meeting**

James Katz, Esq.¹
(on behalf of Camden County Council 10)
Complainant

GRC Complaint No. 2012-51

v.

NJ Civil Service Commission²
Custodian of Records

Records Relevant to Complaint: Any and all documents which refer, relate, were considered or were received from third-parties in connection with the Rule Proposal pertaining to *N.J.A.C. 4A-4-4.8*, cited in the New Jersey Register at 44 N.J.R. 137, including but not limited to, all of the documents relied upon in proposing this Amendment, which are in the administrative file.

Request Made: January 25, 2012

Response Made: February 3, 2012 and February 14, 2012

Custodian: Christopher Randazzo

GRC Complaint Filed: February 29, 2012³

Background

January 25, 2012

Complainant's Open Public Records Act ("OPRA") request. The Complainant requests the records relevant to this complaint listed above on an official OPRA request form. The Complainant indicates that the preferred method of delivery is e-mail.

February 3, 2012

Custodian's response to the OPRA request. The Custodian responds in writing via e-mail to the Complainant's OPRA request on the seventh (7th) business day following receipt of such request. The Custodian states that the Complainant must clarify his request or the Custodian will deny the request as being overly broad or unclear. The Custodian states that in MAG Entertainment v. Division of Alcoholic Beverage Control, 375 N.J. Super. 534 (App. Div. 2005), the New Jersey Superior Court held that "[u]nder OPRA, agencies are required to disclose only 'identifiable' government records not otherwise exempt...In short, OPRA does not countenance open-ended searched of an agency's files." The Custodian states that the Complainant's OPRA request is broad and

¹ The Complainant is an attorney representing Camden County Council 10.

² Represented by DAG Pamela N. Ullman, on behalf of the NJ Attorney General.

³ The GRC received the Denial of Access Complaint on said date.

unclear. The Custodian cites to Bent v. Stafford Police Department, 381 N.J. Super. 30, 37 (October 2005), for the proposition that "...a proper request under OPRA must identify with reasonable clarity those documents that are desired, and a party cannot satisfy this requirement by simply requesting all of an agency's documents."

The Custodian asks the Complainant to provide more information and/or a description concerning the records sought. The Custodian also asks the Complainant to provide the names of the "third-parties in connection..." mentioned in the request. Additionally, the Custodian asks the Complainant to provide a specific date or range of dates relevant to this search. The Custodian states that the GRC held in Donato v. Township of Union, GRC Complaint No. 2005-182 (February 2007) that a custodian is obligated to search files to find the identifiable government records; however, the "...custodian is not required to research her files to figure out which records, if any, might be responsive to a broad and unclear OPRA request."

Moreover, the Custodian states that if the Complainant is seeking access to e-mails, the Complainant must provide clarification of the request. The Custodian states that in Elcavage v. West Milford Township (Passaic), GRC Complaint No. 2009-07 (April 2010), the GRC held that "an OPRA request for an e-mail or e-mails shall therefore focus upon the following four (4) characteristics: 1. Content and or subject, 2. Specific date or range of dates, 3. Sender, 4. Recipients."

Further, the Custodian states that the Complainant's OPRA request will be closed if the Complainant fails to provide clarification of this request by February 17, 2021.⁴

February 3, 2012

E-mail from Complainant to Custodian providing clarification of the Complainant's OPRA request. The Complainant states that the relevant time period for the request is July 20, 2011 through January 17, 2012. The Complainant states that "third parties" refers specifically to Governor Christie's office. Additionally, the Complainant states that the subject matter is documents which are in the administrative file in connection with the rule proposal pertaining to *N.J.A.C. 4A-4.8* cited in New Jersey Register 44 N.J.R. 137; documents which were considered in connection with that rule proposal; and any documents which refer or discuss that proposed rule change. The Complainant also states that documents would include e-mails, consisting of the same specific parameter, including both the time period and subject matter referenced above.

February 14, 2012

Custodian's subsequent response to the OPRA request. The Custodian responds in writing via e-mail to the Complainant's OPRA request on the seventh (7th) business day following receipt of the Complainant's clarification of the request. The Custodian states that he is in receipt of the Complainant's clarification, but access is denied. The Custodian states that while the Complainant provided a time frame for the request, the Complainant failed to identify the specific government record, the sender or recipient, and as such, the request remains broad and unclear. The Custodian states that the Civil Service Commission is only obligated to disclose identifiable government records and for

⁴ It is reasonable to conclude that the Custodian meant February 17, 2012, not 2021.

that reason, requestors must specifically describe the records sought. The Custodian recites the case law from the courts and the GRC contained in his February 3, 2012 response to the Complainant's request.

February 29, 2012

Denial of Access Complaint filed with the Government Records Council ("GRC") with the following attachments:

- Copy of *N.J.A.C. 4A:4-4.8*
- Copy of In the Matter of Nicholas R. Foglio, Firefighter (M22460) Ocean City, 207 N.J. 38 (July 19, 2011)
- Complainant's OPRA request dated January 25, 2012
- Custodian's response to the OPRA request dated February 3, 2012
- Complainant's clarification of the OPRA request dated February 3, 2012
- Custodian's subsequent response to the OPRA request dated February 14, 2012

The Complainant states that he submitted his OPRA request on January 25, 2012 regarding access to records required for the Complainant to provide pertinent comments in response to the Civil Service Commission's rule proposals. The Complainant states that the Custodian responded to the request on February 3, 2012 indicating that the request was overly broad and required clarification. The Complainant states that he provided the requested clarification to the Custodian on February 3, 2012. Additionally, the Complainant states that he indicated the Custodian should contact the Complainant regarding questions about the Complainant's OPRA request. The Complainant states that rather than attempting to resolve the confusion, the Custodian denied the request on February 14, 2012 claiming that the request remained broad and unclear.

The Complainant asserts that the Custodian's denial of his OPRA request is inconsistent with OPRA and its underlying principles. The Complainant states that both the history of the enactment of OPRA and its language underscore that it is to be broadly construed favoring disclosure of public records and the Act places the burden of proof on the government to show that a requested record should be excluded from disclosure. The Complainant states that the Custodian denied the request on the basis that said request is broad and unclear. The Complainant contends that this is untrue.

First, the Complainant asserts that the request deals with a specific subject – the administrative record which was relied upon by the Commission to promulgate a proposed amendment to *N.J.A.C. 4A-4-4.8*. Second, the Complainant claims that the request encompasses a specific time period, covering July 20, 2011 through January 17, 2012. Third, the Complainant contends that the request encompassed three classes of documents: those relied upon to propose this amendment; those which are in the administrative file; or any e-mails or documents from the Governor's Office pertaining to the amendment. The Complainant stated that this amendment to an existing rule was proposed based upon an administrative record and the request seeks those documents which are in the administrative record or were relied upon or considered by the Commission in connection with proposing this rule. Finally, the Complainant states that

he is seeking any e-mails from the Governor's Office to the Civil Service Commission regarding the amendment to this rule.

The Complainant asserts that even if the Commission found portions of the request to be unclear, there are documents which are in the Commission's files which are responsive to the request and those documents should have been disclosed rather than the Commission relying upon its blanket refusal to provide the relevant documents. The Complainant states that because written comments on the proposed Rule must be submitted by March 17, 2012, this is a time sensitive request.

Also, the Complainant does not agree to mediate this complaint.

March 15, 2012

Letter of representation from Custodian's Counsel.

April 23, 2012

Request for the Statement of Information ("SOI") sent to the Custodian.

April 25, 2012

E-mail from Custodian's Counsel to GRC. Counsel requests an extension of time to submit the Custodian's SOI.

April 26, 2012

E-mail from GRC to Custodian's Counsel. The GRC grants a five (5) business day extension of time for Counsel to submit the Custodian's SOI. The GRC states the extended deadline date is the close of business on May 7, 2012.

May 4, 2012⁵

Custodian's SOI with the following attachments:

- Complainant's OPRA request dated January 25, 2012
- Custodian's response to the OPRA request dated February 3, 2012
- Complainant's clarification e-mail dated February 3, 2012
- Custodian's response to the clarified OPRA request dated February 14, 2012

The Custodian certifies that he received the Complainant's OPRA request on January 25, 2012. The Custodian certifies that he initially responded to the Complainant's OPRA request on February 3, 2012 seeking clarification of the request for "any and all documents...including but not limited to, all of the documents relied upon...or which are in the administrative file" because the request is overly broad. The Custodian certifies that he informed the Complainant that he would deny the request without any further clarification. Specifically, the Custodian certifies that he requested the Complainant to provide a description of the records sought, the names of the third parties mentioned, as well as a date or a date range for the request. Additionally, the

⁵ The Custodian signed the SOI on May 4, 2012; however, the Custodian's Counsel submitted the SOI under cover letter dated May 7, 2012.

Custodian certifies that he provided guidance on the characteristics required regarding an OPRA request for e-mails.

The Custodian certifies that he received the Complainant's clarification e-mail on February 3, 2012, wherein the Complainant clarified the time period for the request. Additionally, the Custodian states that the Complainant indicated that "third parties" refers to Governor Christie's office. Further, the Complainant indicated that the subject matter is documents which are in the administrative file in connection with the rule proposal pertaining to *N.J.A.C. 4A-4.8* cited in *New Jersey Register* at 44 N.J.R. 137; documents which were considered in connection with that rule proposal; and any documents which refer or discuss that proposed rule change. The Custodian also stated that the Complainant indicated that documents would include e-mails, consisting of the same specific parameter, including both the time period and subject matter referenced above.

The Custodian certifies that on February 14, 2012 he sent an e-mail to the Complainant denying the Complainant's OPRA request, noting that while the Complainant did provide a time period for the request, the Complainant failed to identify any specific government records, and therefore the OPRA requests remains broad and unclear. The Custodian certifies that he informed the Complainant that the Civil Service Commission is only obligated to disclose identifiable government records. *See* MAG Entertainment v. Division of Alcoholic Beverage Control, 375 N.J. Super. 534 (App. Div. 2005); Bent v. Stafford Police Department, 381 N.J. Super. 30, 37 (App. Div. 2005); Donato v. Township of Union, GRC Complaint No. 2005-182 (February 2007); Elcavage v. West Milford Township (Passaic), GRC Complaint No. 2009-07 (April 2010); New Jersey Builders Association v. New Jersey Council on Affordable Housing, 390 N.J. Super. 166 (App. Div. 2007); and Librizzi v. Township of Verona Police Department, GRC Complaint No. 2009-213 (August 2010).

Also, the Custodian certifies that the search undertaken to satisfy the Complainant's OPRA request, as well as the last date upon which records that may have been responsive to the request were destroyed in accordance with the Records Destruction Schedule established and approved by Records Management Services, is not applicable to this complaint.

Analysis

Whether the Complainant's OPRA request is overly broad and/or unclear?

OPRA provides that:

"...government records shall be readily accessible for inspection, copying, or examination by the citizens of this State, *with certain exceptions...*" (Emphasis added.) N.J.S.A. 47:1A-1.

Additionally, OPRA defines a government record as:

“... any paper, written or printed book, document, drawing, map, plan, photograph, microfilm, data processed or image processed document, information stored or maintained electronically or by sound-recording or in a similar device, or any copy thereof, that has been *made, maintained or kept on file ... or that has been received* in the course of his or its official business ...” (Emphasis added.) N.J.S.A. 47:1A-1.1.

OPRA places the onus on the Custodian to prove that a denial of access is lawful. Specifically, OPRA states:

“...[t]he public agency shall have the burden of proving that the denial of access is authorized by law...” N.J.S.A. 47:1A-6.

The Complainant stated that he submitted an OPRA request on January 25, 2012 seeking the following records:

“any and all documents which refer, relate, were considered or were received from third-parties in connection with the Rule Proposal pertaining to *N.J.A.C. 4A-4-4.8*, cited in the New Jersey Register at 44 N.J.R. 137, including but not limited to, all of the documents relied upon in proposing this Amendment which are in the administrative file.”

The Custodian certified that he responded to the Complainant’s request on the seventh (7th) business day following receipt of said request, and sought clarification of the request because the request is overly broad and unclear. The Custodian stated that he is only obligated to provide access to specifically identifiable government records. As such, the Custodian asked the Complainant to provide a description of the records sought, the names of the third parties mentioned, as well as a date or a date range for the request. Additionally, the Custodian certified that he provided guidance on the characteristics required regarding an OPRA request for e-mails.

The Complainant stated that he provided the Custodian with the requested clarification on February 3, 2012. In said response, the Complainant stated that the relevant time period for the request is July 20, 2011 through January 17, 2012. The Complainant stated that “third parties” refers specifically to Governor Christie’s office. Additionally, the Complainant stated that the subject matter is documents which are in the administrative file in connection with the rule proposal pertaining to *N.J.A.C. 4A-4.8* cited in the New Jersey Register at 44 N.J.R. 137; documents which were considered in connection with that rule proposal; and any documents which refer or discuss that proposed rule change. The Complainant also stated that documents would include e-mails, consisting of the same specific parameter, including both the time period and subject matter referenced above.

The Custodian, on February 14, 2012, denied access to the Complainant’s clarified request on the basis that the request is overly broad and unclear, and fails to identify any specific government records.

Conversely, the Complainant asserts that his request does identify specific records. First, the Complainant asserts that the request deals with a specific subject – the administrative record which was relied upon by the Commission to promulgate a proposed amendment to *N.J.A.C. 4A-4-4.8*. Second, the Complainant claims that the request encompasses a specific time period, covering July 20, 2011 through January 17, 2012. Third, the Complainant contends that the request encompassed three classes of documents: those relied upon to propose this amendment; those which are in the administrative file; or any e-mails or documents from the Governor’s Office pertaining to the amendment. The Complainant stated that this amendment to an existing rule was proposed based upon an administrative record and the request seeks those documents which are in the administrative record or were relied upon or considered by the Commission in connection with proposing this rule. Finally, the Complainant states that he is seeking any e-mails from the Governor’s Office to the Civil Service Commission regarding the amendment to this rule.

The New Jersey Superior Court has held that “[w]hile OPRA provides an alternative means of access to government documents not otherwise exempted from its reach, *it is not intended as a research tool litigants may use to force government officials to identify and siphon useful information. Rather, OPRA simply operates to make identifiable government records ‘readily accessible for inspection, copying, or examination.’ N.J.S.A. 47:1A-1.*” (Emphasis added.) MAG Entertainment, LLC v. Division of Alcoholic Beverage Control, 375 N.J. Super. 534, 546 (App. Div. 2005). The Court further held that “[u]nder OPRA, *agencies are required to disclose only ‘identifiable’ government records not otherwise exempt ... In short, OPRA does not countenance open-ended searches of an agency’s files.*” (Emphasis added.) *Id.* at 549.

In determining that MAG Entertainment’s request for “all documents or records” from the Division of Alcoholic Beverage Control pertaining to selective enforcement was invalid under OPRA, the Appellate Division noted that:

“[m]ost significantly, the request failed to identify with any specificity or particularity the governmental records sought. MAG provided neither names nor any identifiers other than a broad generic description of a brand or type of case prosecuted by the agency in the past. Such an open-ended demand required the Division’s records custodian to manually search through all of the agency’s files, analyze, compile and collate the information contained therein, and identify for MAG the cases relative to its selective enforcement defense in the OAL litigation. Further, once the cases were identified, the records custodian would then be required to evaluate, sort out, and determine the documents to be produced and those otherwise exempted.” *Id.*

Further, in Bent v. Stafford Police Department, 381 N.J. Super. 30, 37 (App. Div. 2005),⁶ the Superior Court references MAG in that the Court held that a requestor must specifically describe the document sought because OPRA operates to make identifiable

⁶ Affirmed on appeal regarding Bent v. Stafford Police Department, GRC Case No. 2004-78 (October 2004).

government records “accessible.” “As such, a proper request under OPRA must identify with reasonable clarity those documents that are desired, and a party cannot satisfy this requirement by simply requesting all of an agency's documents.”⁷

Additionally, in New Jersey Builders Association v. New Jersey Council on Affordable Housing, 390 N.J.Super. 166, 180 (App. Div. 2007) the court cited MAG by stating that “...when a request is ‘complex’ because it fails to specifically identify the documents sought, then that request is not ‘encompassed’ by OPRA...”

Furthermore, in Schuler v. Borough of Bloomsbury, GRC Complaint No. 2007-151 (February 2009) the Council held that “[b]ecause the Complainant’s OPRA requests # 2-5 are not requests for identifiable government records, the requests are invalid and the Custodian has not unlawfully denied access to the requested records pursuant to MAG Entertainment, LLC v. Division of Alcoholic Beverage Control, 375 N.J.Super. 534 (App. Div. 2005) and Bent v. Stafford Police Department, 381 N.J.Super. 30 (App. Div. 2005).”

This matter is substantially different from the facts presented in Burnett v. County of Gloucester, 415 N.J.Super. 506 (App. Div. 2010). In Burnett, the plaintiff appealed from an order of summary judgment entered against him in his suit to compel production by the County of Gloucester of documents requested pursuant to OPRA, consisting of “[a]ny and all *settlements, releases or similar documents* entered into, approved or accepted from 1/1/2006 to present.” Id. at 508. (Emphasis added). The Appellate Division determined that the request sought a specific type of document, although it did not specify a particular case to which such document pertained, and was therefore not overly broad. Id. at 515-16.

In this instant matter, the Complainant’s initial OPRA request sought any and all documents which refer, relate, were considered or were received from third-parties in connection with the Rule Proposal pertaining to *N.J.A.C. 4A-4-4.8*, cited in the New Jersey Register at 44 N.J.R. 137, including but not limited to, all of the documents relied upon in proposing this Amendment which are in the administrative file.

The Complainant’s initial request fails to identify any specific government records. The term “any and all *documents...*” does not reference any specific government records; “documents” is a generic term. This request leaves the Custodian to figure out which documents are responsive to the OPRA request, which is not required under OPRA. As stated in Bent, *supra*, “a proper request under OPRA must identify with reasonable clarity those documents that are desired, and a party cannot satisfy this requirement by simply requesting all of an agency's documents.” The Complainant’s initial OPRA request fails to identify specific government records sought.

However, the Complainant provided clarification of this OPRA request. Specifically, the Complainant clarified his request to seek the administrative record, which was relied upon by the Commission to promulgate a proposed amendment to *N.J.A.C. 4A-4-4.8*. The Complainant identified three classes of documents: those relied

⁷ As stated in Bent, *supra*.

upon to propose this amendment; those which are in the administrative file; or any e-mails or documents from the Governor's Office to the Civil Service Commission pertaining to the amendment. The Complainant stated that the request encompasses a specific time period, covering July 20, 2011 through January 17, 2012.

Although the Complainant did amend his request to include a specific time period for the request, the request remains overly broad and unclear. "[T]he administrative record, which was relied upon by the Commission to promulgate a proposed amendment to *N.J.A.C. 4A-4-4.8*" is not a specifically identifiable government record. Such a request requires the custodian to determine which records were utilized in the decision making process to propose amendments to a regulation. Such a determination is not required under OPRA.

Additionally, "those which are in the administrative file" also does not specifically identify any records, but rather names an entire file. In *Toscano v. NJ Department of Labor, Division of Vocational Rehabilitation Services*, GRC Complaint No. 2010-293 (March 2012), the Council held that:

"the Complainant's request is overbroad in that it seeks an entire case file without naming specific identifiable government records. Consistent with *Bent and MAG*, a party seeking records cannot make a broad request for all of a state agency's records and should properly name specific records so that a Custodian will not have to conduct research or fulfill an overly broad request that is outside the scope of their duties."

Finally, the Complainant clarified his request to seek any e-mails or documents from the Governor's Office to the Civil Service Commission pertaining to the amendment. In *Elcavage v. West Milford Township (Passiac)*, GRC Complaint No. 2009-08 (April 2010), the Council determined the level of specificity required for an OPRA request for e-mails. Specifically, the Council held that:

"[i]n accord with *MAG, supra*, and its progeny, in order to specifically identify an e-mail, OPRA requests must contain (1) the content and/or subject of the e-mail, (2) the specific date or range of dates during which the e-mail was transmitted or the emails were transmitted, and (3) a valid e-mail request must identify the sender and/or the recipient thereof."

In this instant complaint, the Complainant does provide the content and/or subject of the e-mail: the amendment of the regulation. The Complainant also provides a date range: July 20, 2011 through January 17, 2012. Finally, the Complainant names entire agencies as the parties to the e-mails but fails to name any specific sender or recipient.

In *Wolosky v. Township of Randolph (Morris)*, GRC Complaint No. 2010-244 (February 2012), the complainant sought access to "copies of every e-mail sent or received by the Municipal Clerk's office to or from every other Municipal Clerk in Morris County regarding the complainant, his OPRA request and/or other OPRA matters from June 29, 2010 through August 23, 2010." The Council rendered the complainant's request invalid because it failed to specifically name identifiable individual senders and

recipients and because the request required research beyond the scope of a custodian's duties.

Here, the Custodian would be required to determine which employees of both the Governor's Office and the Civil Service Commission *may* have communicated via e-mail regarding the amendment to the regulation. Such a determination is not required under OPRA.

Therefore, the Complainant's initial OPRA request as well as the Complainant's clarified request are invalid under OPRA because the requests are overly broad and/or unclear as they fail to name specifically identifiable government records and require research beyond the scope of a custodian's duties pursuant to MAG, *supra*, Bent, *supra*, NJ Builders, *supra*, and Schuler, *supra*. *See also* Toscano, *supra*, Elcavage, *supra*, and Wolosky, *supra*.

Conclusions and Recommendations

The Executive Director respectfully recommends the Council find that the Complainant's initial OPRA request as well as the Complainant's clarified request are invalid under OPRA because the requests are overly broad and/or unclear as they fail to name specifically identifiable government records and require research beyond the scope of a custodian's duties pursuant to MAG Entertainment, LLC v. Division of Alcoholic Beverage Control, 375 N.J. Super. 534, 546 (App. Div. 2005), Bent v. Stafford Police Department, 381 N.J. Super. 30, 37 (App. Div. 2005), New Jersey Builders Association v. New Jersey Council on Affordable Housing, 390 N.J. Super. 166, 180 (App. Div. 2007), and Schuler v. Borough of Bloomsbury, GRC Complaint No. 2007-151 (February 2009). *See also* Toscano v. NJ Department of Labor, Division of Vocational Rehabilitation Services, GRC Complaint No. 2010-293 (March 2012), Elcavage v. West Milford Township (Passiac), GRC Complaint No. 2009-08 (April 2010), and Wolosky v. Township of Randolph (Morris), GRC Complaint No. 2010-244 (February 2012).

Prepared By: Dara L. Barry
Communications Manager

Approved By: Karyn Gordon, Esq.
Acting Executive Director

July 24, 2012