



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

September 30, 2014 Government Records Council Meeting

Sabino Valdes
Complainant

Complaint No. 2013-278

v.

Government Records Council
Custodian of Record

At the September 30, 2014 public meeting, the Government Records Council (“Council”) considered the September 23, 2014 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:

1. The Council determines that the Doctrine of Necessity permits any Council members who may have a conflict of interest to participate in the adjudication of these matters, notwithstanding any conflicts of interest that may exist, because the Complainant has specifically chosen to adjudicate the instant Denial of Access Complaint in this forum, there is a pressing public need to adjudicate these matters, the Council has unique expertise and experience which cannot be duplicated at any other forum, and the Council could not fulfill its statutory obligation to review and adjudicate this Denial of Access Complaint pursuant to N.J.S.A. 47:1A-7 if its members were required to recuse themselves. *See Sokolinski v. Woodbridge Township*, 192 N.J. Super. 101, 106 (App. Div.1983); *Cranberry Lake Quarry Company v. Johnson*, 95 N.J. Super. 495, 521 (App. Div. 1967); *Gunthner v. Planning Board of the Borough of Bay Head*, 335 N.J. Super. 452 (Law Div. 2000); *Allen v. Toms River Regional Board of Education*, 233 N.J. Super. 642, 647 (Law Div.1989).
2. The Custodian has borne his burden of proof that he timely responded to the Complainant’s OPRA Request No. 1 by mailing a valid, written response, including copies of the requested documents, within seven (7) business days of receiving the complaint. N.J.S.A. 47:1A-6.
3. The Complainant’s Request No. 2 is invalid because it fails to identify the specific minutes sought and would require the Custodian to conduct research in order to determine which, or whether any, of the GRC’s minutes covering a ten (10) year period contain the approval of the January 17, 2003 meeting minutes. *See MAG Entertainment, LLC v. Division of Alcoholic Beverage Control*, 375 N.J. Super. 534,



546-47 (App. Div. 2005); Valdes v. Union City Bd. of Educ. (Hudson), GRC Complaint No. 2012-329 (August 2013); Valdes v. Union City Board of Education (Hudson), GRC Complaint No. 2011-147, 2011-157, 2011-172 & 2011-181 (July 2012). The Custodian has borne his burden of proof that he lawfully denied access to the Complainant's request. N.J.S.A. 47:1A-6.

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 30th Day of September, 2014

Robin Berg Tabakin, Esq., Chair
Government Records Council

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

Steven Ritardi, Esq., Secretary
Government Records Council

Decision Distribution Date: October 3, 2014

**STATE OF NEW JERSEY
GOVERNMENT RECORDS COUNCIL**

**Findings and Recommendations of the Executive Director
September 30, 2014 Council Meeting**

**Sabino Valdes¹
Complainant**

GRC Complaint No. 2013-278

v.

**Government Records Council²
Custodial Agency**

Records Relevant to Complaint

OPRA Request No. 1: Copy of Complainant's Denial of Access Complaint Valdes v. Union City Board of Education (Hudson), GRC Complaint No. 2013-201 without attachments, a copy of the Complainant's Amended Denial of Access Complaint for same, and a copy of the Complainant's Rebuttal to the Statement of Information filed by the Custodian in same.

OPRA Request No. 2: A copy of the meeting minutes made sometime from February, 2003 to September, 2013 inclusive of the Council's approval of the January 17, 2003 meeting minutes.

Custodian of Record: Frank Caruso

Request Received by Custodian: OPRA Request No. 1: August 27, 2013;

OPRA Request No. 2: September 3, 2013

Response Made by Custodian: OPRA Request No. 1: September 6, 2013;

OPRA Request No. 2: September 10, 2013

GRC Complaint Received: September 20, 2013

Background³

Request and Response:

On August 27, 2013, the Complainant submitted an Open Public Records Act ("OPRA") request to the Custodian seeking the records described above in Request No. 1. The Complainant indicated that he preferred the records to be delivered via U.S. mail. On September 3, 2013, the Complainant submitted an OPRA request to the Custodian seeking the records described above in Request No. 2, also to be delivered via U.S. mail.

¹ No legal representation listed on record.

² Represented by DAG Debra Allen.

³ The parties may have submitted additional correspondence or made additional statements/assertions in the submissions identified herein. However, the Council includes in the Findings and Recommendations of the Executive Director the submissions necessary and relevant for the adjudication of this complaint.

Sabino Valdes v. Government Records Council, GRC Complaint No. 2013-278 – Findings and Recommendations of the Executive Director

On September 6, 2013, seven (7) business days after receiving Request No. 1, the Custodian responded providing the records sought therein to the Complainant via U.S. mail. On September 10, 2013, five (5) business days after receiving Request No. 2, the Custodian responded denying access to the records sought therein because the request was impermissibly broad and would require the Custodian to perform research. The Custodian advised the Complainant to request meeting minutes covering a specific period of time or to consult the Government Records Council's ("GRC's) approved meeting minutes online.

Denial of Access Complaint:

On September 20, 2013, the Complainant filed a Denial of Access Complaint with the GRC. The Complainant asserts that, regarding Request No. 1, he did not receive a reply from the GRC. The Complainant states that on September 9, 2013, he faxed a letter to the GRC noting that he had not received a reply to his August 27, 2013 request, and that, in a letter dated September 9, 2013, the GRC advised him that a response had been provided via U.S. mail on September 6, 2013.

Regarding Request No. 2, the Complainant argues that the Custodian improperly denied his request because, unlike the requests in New Jersey Builders Association v. New Jersey Council on Affordable Housing, 390 N.J. Super. 166, 180 (App. Div. 2007) and MAG Entertainment, LLC v. Division of Alcoholic Beverage Control, 375 N.J. Super. 534, 546 (App. Div. 2005), his is not a blanket request and does not require the Custodian to analyze government records in order to provide a response. Rather, the Complainant analogizes his request to one for teacher records found to be valid in an unpublished Appellate Division decision in which "[t]he request [did] not require collation, research, or analysis." Elizabeth Educ. Ass'n v. Elizabeth Bd. of Educ., No. A-4717-10T1 (App. Div. June 5, 2012). The Complainant contends that his request is one for identifiable government records that asks the Custodian to perform a search, rather than research, and that his request cannot be denied simply because he did not provide the specific date of the meeting minutes sought. The Complainant further argues that the Custodian is legally obligated to search for information confirming the approval of the Council's January 17, 2003 meeting minutes within the Council's minutes for meetings from February, 2003 through September, 2013. The Complainant also contends that the Council's previous holding in Valdes v. Union City Board of Education (Hudson), GRC Complaint No. 2011-147, 2011-157, 2011-172 & 2011-181 (July 2012) is invalid.

Statement of Information:

On October 1, 2013, the Custodian filed a Statement of Information ("SOI"). The Custodian certifies that he received Request No. 1 on August 27, 2013 and responded on September 6, 2013. The Custodian also certifies that he received Request No. 2 on September 3, 2013 and responded on September 10, 2013.

The Custodian states, in response to the Complainant's contention that he received no response to his August 27, 2013 request, that because the Complainant chose to receive the responsive records via U.S. mail, the GRC was at the mercy of the postal system. The Custodian argues that because he mailed the responsive records to the Complainant within seven (7)

business days of receiving the request, no “deemed” denial of Request No. 1 occurred under N.J.S.A. 47:1A-6.

The Custodian contends that, in response to Request No. 2, he denied access based on longtime precedential GRC case law that does not require a custodian to perform research in response to an OPRA request. *Citing* Valdes v. Union City Bd. of Educ. (Hudson), GRC Complaint No. 2012-329 (August 2013); Valdes, GRC 2011-147 *et seq.*; Ray v. Freedom Academy Charter Sch. (Camden), GRC Complaint No. 2009-185 (August 2010); Taylor v. Cherry Hill Bd. of Educ. (Camden), GRC Complaint No. 2008-258 (August 2009); D’Aquanni v. Borough of Roselle (Union), GRC Complaint No. 2007-78 (June 2007). The Custodian argues that while the Complainant has not identified the specific minutes responsive to his request, the inclusion of a time frame, as in Valdes, GRC 2012-329, does make the request valid. The Custodian additionally states that Elizabeth Education Association, as cited by the Complainant, is inapplicable here because the plaintiff in that case sought personnel information, which is one of few instances where OPRA recognizes “information” as a government record. The Custodian emphasizes that he suggested that the Complainant either request meeting minutes for a specific period of time or perform his own research by consulting the approved meeting minutes available on the GRC’s website.

Additional Submissions:

On October 2, 2013, the Complainant filed an Amended Denial of Access Complaint with the GRC. Here, the Complainant argues that the Custodian acted in error because he provided the Complainant with a copy of the requested approved January 17, 2003 meeting minutes but not a copy of a document indicating that said minutes had been approved. The Complainant contends that his Request No. 2 is not a blanket request, but one for information included in meeting minutes relevant to the approval of previous minutes.

On October 21, 2013, the Complainant submitted a rebuttal to the Custodian’s SOI. The Complainant argues that based on the unpublished Appellate Division case Schmidt v. City of Gloucester City, No. A-0520-11T1 (App. Div. July 30, 2012), where the court ordered the disclosure of what had been unapproved meeting minutes based on violations of both OPRA and the Open Public Meetings Act, the Custodian here is required to validate the approval of meeting minutes before disclosing same to the public. The Complainant suggests that the Custodian is withholding public information because the Custodian provided the Complainant with a copy of the approved January 17, 2003 meeting minutes and, as such, must have verified the approval of said minutes.

Analysis

Doctrine of Necessity

OPRA provides in pertinent part that:

A person who is denied access to a government record by the custodian of the record, at the option of the requestor, may:

institute a proceeding to challenge the custodian's decision by filing an action in Superior Court which shall be heard in the vicinage where it is filed by a Superior Court Judge who has been designated to hear such cases because of that judge's knowledge and expertise in matters relating to access to government records; or

in lieu of filing an action in Superior Court, file a complaint with the Government Records Council established pursuant to . . . [N.J.S.A.]47:1A-7.

The right to institute any proceeding under this section shall be solely that of the requestor. Any such proceeding shall proceed in a summary or expedited manner.

N.J.S.A. 47:1A-6.

The Ethics Law states, in turn, that:

[no] local government officer or employee shall act in his official capacity in any matter where he, a member of his family, or a business organization in which he has an interest, has a direct or indirect financial or personal involvement that might reasonably be expected to impair his objectivity or independence in judgment[.]

N.J.S.A. 40A:9-22.5(d).

Further, Wyzykowski v. Rizas, 132 N.J. 509, 523 (1993) describes the common law conflict of interest rule as follows:

[a] public official is disqualified from participating in judicial or quasi-judicial proceedings in which the official has a conflicting interest that may interfere with the impartial performance of his duties as a member of the public body. Id. at 523 (citing Scotch Plains-Fanwood Bd. of Educ. v. Syvertsen, 251 N.J. Super. 566, 568 (App.Div.1991)).

According to Wyzykowski, the Ethics Law further “refined the definition of a conflict of interest.” Id. at 529.

The determination of whether a particular interest is sufficient to disqualify a board member is necessarily factual in nature and depends upon the circumstances in each case. Id. (citing Van Itallie v. Franklin Lakes, 28 N.J. 258, 268 (1958)). Overall, “[t]he question will always be whether the circumstances could reasonably be interpreted to show that they had the likely capacity to tempt the official to depart from his sworn public duty.” Id. It is not necessary to demonstrate actual proof of dishonesty because only the potential for conflict is necessary. Id. at 524 (citing Aldom v. Borough of Roseland, 42 N.J. Super. 495, 503 (App.Div.1956)). In general, “[a] conflicting interest arises when a public official has an interest not shared in common with the other members of the public.” Id. (citing Griggs v. Borough of Princeton, 33 N.J. 207, 220-21, (1960)). However, “[t]here cannot be a conflict of interest where there does not exist, realistically, contradictory desires tugging the official in opposite directions.” Id. (citing LaRue v. Twp. of E. Brunswick, 68 N.J. Super. 435, 448 (App.Div.1961)).

When it is impossible to constitute a quorum, for example, disqualified members may, of necessity, have to vote, but this departure from the disqualification rule should be narrowly circumscribed and only invoked if there is some compelling reason justifying its use. *See Wyzkowski*, 132 N.J. at 528; *Griggs*, 33 N.J. at 221. Generally speaking, the doctrine of necessity is utilized when a pressing public need exists, and it would be detrimental to the public's well-being to bar the disqualified members from participating in a vote. *Sokolinski v. Woodbridge Twp.*, 192 N.J. Super. 101, 106 (App. Div.1983); *Cranberry Lake Quarry Co. v. Johnson*, 95 N.J. Super. 495, 521 (App. Div. 1967).

In *Allen v. Toms River Regional Board of Education*, 233 N.J. Super. 642, 647 (Law Div. 1989), the plaintiff township and boroughs were the constituent members of a council which advised the defendant regional Board of Education. *Id.* at 644-45. Due to a vote against the defendant's budget, the council was to consider the matter. *Id.* at 644. However, four members of the council had conflicts of interest regarding their involvement with the Board of Education, which affected the ability of the membership to reach a quorum. *Id.*

The court examined the history of the doctrine of necessity in New Jersey and held that the doctrine:

will be invoked in those circumstances in which there is a pressing public need for action (that is, the matter cannot be laid aside until another date), there is no alternative forum which can grant the same relief and the body is unable to act without the members in conflict taking part.

Id. at 651.

The court noted that “[t]he public clamor with respect to the proposed budget is documented in the record[.]” as was “[t]he public insistence that there be a review by the governmental authorities[.]” *Id.* The court also noted that the budget was large and would have a significant impact on all of the taxpayers in the constituent municipalities. *Id.* Moreover, although the applicable statute provided for a review of the budget before the Commissioner of Education, the court determined that such review did not “allow for the public input which would be received by each of the governing bodies so that direct public involvement [would] be denied.” *Id.* Finally, the court determined that because the council “could not achieve a quorum with four of its seven members in conflict, it was only by authorizing those four members to act that the council could fulfill its statutory obligation to review and certify the amount necessary to be appropriated and address an issue of substantial importance in which the citizenry has a right to participate. *Id.*”

In *Gunthner v. Planning Board of the Borough of Bay Head*, 335 N.J. Super. 452 (Law Div. 2000), the plaintiff sought to develop property contiguous to a yacht club. He filed a development application with the defendant planning board, but filed an order to show cause seeking to disqualify seven of the Board’s members from voting on said application, stating that they had a conflict of interest because they were members of the yacht club. *Id.* at 458-59. However, the Law Division held that the doctrine of necessity permitted the challenged Board members to rule on the application because there was a pressing public need and it would have

been detrimental to the public's well-being to bar the disqualified members, because to do so would have resulted in an automatic acceptance of the application. Id. at 464.

In the present matter, the Complainant chose to file his Denial of Access Complaint against the GRC for adjudication before the Council. The choice of this forum, as opposed to Superior Court, is the Complainant's prerogative under N.J.S.A. 47:1A-6. The Council, in turn, has the power to determine if a complaint is outside of its jurisdiction. *See* N.J.S.A. 47:1A-7(e).

Here, the Council notes that there is no satisfactory alternative forum in which this complaint may be adjudicated. The Council has unique expertise and experience which cannot be duplicated at any other forum. If members of the Council were required to recuse themselves from the adjudication of complaints filed against the GRC due to potential conflicts of interest issues, the Council would lack the quorum necessary to fulfill its obligation, both under statute and to citizens of this State, to "receive, hear, review and adjudicate a complaint filed by any person concerning a denial of access to a government record by a records custodian." N.J.S.A. 47:1A-7(b).

Therefore, the Council determines that the Doctrine of Necessity permits any Council members who may have a conflict of interest to participate in the adjudication of these matters, notwithstanding any conflicts of interest that may exist, because the Complainant has specifically chosen to adjudicate the instant Denial of Access Complaint in this forum, there is a pressing public need to adjudicate these matters, the Council has unique expertise and experience which cannot be duplicated at any other forum, and the Council could not fulfill its statutory obligation to review and adjudicate this Denial of Access Complaint pursuant to N.J.S.A. 47:1A-7 if its members were required to recuse themselves. *See* Sokolinski, 192 N.J. Super. at 106; Cranberry Lake Quarry Co, 95 N.J. Super. at 521; Gunthner, 335 N.J. Super. at 452; Allen, 233 N.J. Super. at 647.

Timeliness

OPRA mandates that a custodian must either grant or deny access to requested records within seven (7) business days from receipt of said request. N.J.S.A. 47:1A-5(i). A custodian's failure to respond within the required seven (7) business days results in a "deemed" denial. Id. Further, a custodian's response, either granting or denying access, must be in writing pursuant to N.J.S.A. 47:1A-5(g).⁴ Thus, a custodian's failure to respond in writing to a complainant's OPRA request either granting access, denying access, seeking clarification or requesting an extension of time within the statutorily mandated seven (7) business days results in a "deemed" denial of the complainant's OPRA request pursuant to N.J.S.A. 47:1A-5(g), N.J.S.A. 47:1A-5(i), and Kelley v. Twp. of Rockaway, GRC Complaint No. 2007-11 (Interim Order October 31, 2007).

Here, the Custodian received the Complainant's Request No. 1 on August 27, 2013, and he mailed a written reply, including the responsive records, to the Complainant seven (7) business days later. The GRC has previously found that a custodian provided a lawful, timely

⁴ A custodian's written response either granting access, denying access, seeking clarification or requesting an extension of time within the statutorily mandated seven (7) business days, even if said response is not on the agency's official OPRA request form, is a valid response pursuant to OPRA.

response by mailing said reply within the statutorily mandated seven (7) business day response period. *See, e.g., Santos v. N.J. State Parole Bd.*, GRC Complaint No. 2004-74 (August 2004). Additionally, the record indicates that the Complainant has not provided the Custodian, in this complaint or in others handled by the GRC, with either an email address or fax number to which documents can be sent.

Therefore, the Custodian has borne his burden of proof that he timely responded to the Complainant's OPRA request by mailing a valid, written response, including copies of the requested documents, within seven (7) business days of receiving the complaint. N.J.S.A. 47:1A-6.

Unlawful Denial of Access

OPRA provides that government records made, maintained, kept on file, or received by a public agency in the course of its official business are subject to public access unless otherwise exempt. N.J.S.A. 47:1A-1.1. A custodian must release all records responsive to an OPRA request "with certain exceptions." N.J.S.A. 47:1A-1. Additionally, OPRA places the burden on a custodian to prove that a denial of access to records is lawful pursuant to N.J.S.A. 47:1A-6.

In Valdes, GRC 2011-147 *et seq.*, the complainant submitted four (4) OPRA requests seeking copies of meeting minutes containing motions to approve other minutes. The Council, citing to Taylor, GRC 2008-258 and Ray, GRC 2009-185, determined that the requests were overly broad:

[S]aid requests do not specify the date or time frame of the minutes sought. Rather, the requests seek those minutes at which the UCBOE motioned to approve meeting minutes for four (4) other meetings. Similar to the facts of both Taylor and Ray, the requests herein *seek minutes that refer to a topic and would require the Custodian to research the UCBOE's meeting minutes in order to locate the particular sets of minutes that are responsive to the Complainant's requests . . .* because the Complainant's four (4) requests for minutes "that include a motion made by the Union City Board of Education to approve the minutes" from other meetings fail to identify the specific dates of the minutes sought and would require the Custodian to conduct research in order to locate the responsive records, the Complainant's requests are invalid under OPRA.

Valdes, GRC 2011-147 *et seq.* (emphasis added) (citing N.J. Builders Ass'n, 390 N.J. Super. at 180; Bent v. Twp. of Stafford Police Dep't, 381 N.J. Super. 30 (App. Div. 2005); MAG, 375 N.J. Super. at 546; Schuler v. Borough of Bloomsbury, GRC Complaint No. 2007-151 (February 2009); Donato v. Twp. of Union, GRC Complaint No. 2005-182 (February 2007)).

Here, the Complainant contends, similar to the request at issue in Valdes, GRC 2012-329, that Request No. 2 is sufficiently specific because it seeks the meeting minutes which document the approval of the Council's January 17, 2003 minutes "sometime during the period of February 2003-September 2013." As before, the inclusion of this time frame within the language of the request does not cure its inherent deficiency. The Complainant's request still requires the Custodian to analyze potentially ten (10) years' of meeting minutes to identify the set containing

the approval of the Council's January 17, 2003 minutes. As previously noted by both the GRC and New Jersey courts, OPRA requires custodians to search for sufficiently identified records, but the law does not ask custodians to perform research on behalf of a requestor.⁵ *See, e.g.,* MAG, 375 N.J. Super. at 546-47; Valdes, GRC 2013-394; Ray, GRC 2009-185; Taylor, GRC 2008-258; Donato, GRC 2005-182. That the Custodian provided the Complainant with a copy of the approved January 17, 2003 minutes does not require the Custodian to have already performed the research required by Request No. 2, contrary to the Complainant's assertion. Thus, the request at issue here is improper.

Therefore, the Complainant's Request No. 2 is invalid because it fails to identify the specific minutes sought and would require the Custodian to conduct research in order to determine which, or whether any, of the GRC's minutes covering a ten (10) year period contain the approval of the January 17, 2003 meeting minutes. *See* MAG, 375 N.J. Super. at 546-47; Valdes, GRC 2013-329; Valdes, GRC 2011-147 *et seq.* The Custodian has borne his burden of proof that he lawfully denied access to the Complainant's request. N.J.S.A. 47:1A-6.

Conclusions and Recommendations

The Executive Director respectfully recommends the Council find that:

1. The Council determines that the Doctrine of Necessity permits any Council members who may have a conflict interest to participate in the adjudication of these matters, notwithstanding any conflicts of interest that may exist, because the Complainant has specifically chosen to adjudicate the instant Denial of Access Complaint in this forum, there is a pressing public need to adjudicate these matters, the Council has unique expertise and experience which cannot be duplicated at any other forum, and the Council could not fulfill its statutory obligation to review and adjudicate this Denial of Access Complaint pursuant to N.J.S.A. 47:1A-7 if its members were required to recuse themselves. *See* Sokolinski v. Woodbridge Township, 192 N.J. Super. 101, 106 (App. Div.1983); Cranberry Lake Quarry Company v. Johnson, 95 N.J. Super. 495, 521 (App. Div. 1967); Gunthner v. Planning Board of the Borough of Bay Head, 335 N.J. Super. 452 (Law Div. 2000); Allen v. Toms River Regional Board of Education, 233 N.J. Super. 642, 647 (Law Div.1989).
2. The Custodian has borne his burden of proof that he timely responded to the Complainant's OPRA Request No. 1 by mailing a valid, written response, including copies of the requested documents, within seven (7) business days of receiving the complaint. N.J.S.A. 47:1A-6.
3. The Complainant's Request No. 2 is invalid because it fails to identify the specific minutes sought and would require the Custodian to conduct research in order to determine which, or whether any, of the GRC's minutes covering a ten (10) year period contain the approval of the January 17, 2003 meeting minutes. *See* MAG

⁵ As the Custodian stated in his response to Request No. 2, the GRC's meeting agendas, open session minutes, and closed session minutes dating from 2002 to present are available online at <http://www.nj.gov/grc/meetings/minutes/> and http://www.nj.gov/grc/meetings/minutes/archive_06-02.html.

Entertainment, LLC v. Division of Alcoholic Beverage Control, 375 N.J. Super. 534, 546-47 (App. Div. 2005); Valdes v. Union City Bd. of Educ. (Hudson), GRC Complaint No. 2012-329 (August 2013); Valdes v. Union City Board of Education (Hudson), GRC Complaint No. 2011-147, 2011-157, 2011-172 & 2011-181 (July 2012). The Custodian has borne his burden of proof that he lawfully denied access to the Complainant's request. N.J.S.A. 47:1A-6.

Prepared By: Robert T. Sharkey, Esq.
Staff Attorney

Approved By: Dawn R. SanFilippo, Esq.
Acting Executive Director

June 17, 2014⁶

⁶ This complaint was prepared for adjudication at the Council's July 29, 2014 meeting; however, the complaint could not be adjudicated due to lack of quorum.