



State of New Jersey
GOVERNMENT RECORDS COUNCIL

101 SOUTH BROAD STREET
PO BOX 819
TRENTON, NJ 08625-0819

CHRIS CHRISTIE
Governor

KIM GUADAGNO
Lt. Governor

RICHARD E. CONSTABLE, III
Commissioner

FINAL DECISION

March 31, 2015 Government Records Council Meeting

Al-Qaadir Green
Complainant

Complaint No. 2014-101

v.

County of Essex
Custodian of Record

At the March 31, 2015 public meeting, the Government Records Council (“Council”) considered the March 24, 2015 Supplemental if applicable Findings and Recommendations of the Executive Director and all related documentation submitted by the parties. The Council, by a majority vote, adopted the entirety of said findings and recommendations. The Council, therefore, finds that:

1. The Custodian failed to comply fully with the Council’s February 24, 2015 Interim Order because he did not provide his response to the Complainant or certified confirmation of compliance to the Executive Director within the prescribed time frame. However, because the Custodian provided the responsive records to the Complainant, no further action is required.
2. Although the original Custodian timely responded to the Complainant granting access to the responsive records pending payment, he unlawfully denied access to the Promis Gavel records by not providing same thereafter (as the current Custodian did on March 11, 2015). Further, the current Custodian failed to comply fully with the Council’s February 24, 2015 Interim Order by not performing the required actions within the prescribed time frame. However, the Custodian did provide the responsive records to the Complainant on March 11, 2015. Additionally, the evidence of record does not indicate that either the original or current Custodians’ violations of OPRA had a positive element of conscious wrongdoing or were intentional and deliberate. Therefore, neither Custodian’s actions rise to the level of a knowing and willful violation of OPRA and unreasonable denial of access under the totality of the circumstances.

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 March, 2015

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: April 2, 2015

**STATE OF NEW JERSEY
GOVERNMENT RECORDS COUNCIL**

**Supplemental Findings and Recommendations of the Executive Director
March 31, 2015 Council Meeting**

**Al-Qaadir Green¹
Complainant**

GRC Complaint No. 2014-101

v.

**County of Essex²
Custodial Agency**

Records Relevant to Complaint: Hardcopies via U.S. mail of:

1. The Complainant's "Interstate Agreement on Detainers" ("IAD").
2. The Complainant's New Jersey Promis Gavel indictment detail and event detail regarding Indictment No. 01-10-4344-I.

Custodian of Record: Michael Venezia³

Request Received by Custodian: January 15, 2013 and December 20, 2013

Response Made by Custodian: January 22, 2013 and December 26, 2013

GRC Complaint Received: March 6, 2014

Background

February 24, 2015 Council Meeting:

At its February 24, 2015 public meeting, the Council considered the February 17, 2015 Findings and Recommendations of the Executive Director and all related documentation submitted by the parties. By a majority vote, the Council adopted said findings and recommendations. The Council, therefore, found that:

1. The evidence of record supports that the original Custodian timely responded granting access to responsive records upon payment of the applicable copy costs. Further, the evidence supports that New Jersey State Prison released the Complainant's payment to the County on January 21, 2014. However, the original Custodian may have unlawfully denied access to the responsive records by failing to disclose same after receipt of payment. N.J.S.A. 47:1A-6; Conley v. NJ Dep't of Corrections, GRC Complaint No. 2012-313 *et seq.* (September 2013). The Custodian must either confirm receipt of the Complainant's payment and provide him with the responsive records or legally certify to the date the original Custodian received the

¹ No legal representation listed on record.

² No legal representation listed on record.

³ The original Custodian of Record was Al Fusco.

Complainant's payment and disclosed the responsive records to him and include supporting documentation.

2. In the absence of any arguments regarding the disclosability of the "Interstate Agreement on Detainers" and because Ms. Simms released same to the Custodian for disclosure on January 2, 2015, the Council should decline to address the disclosability of same at this time. However, the Custodian must disclose the "Interstate Agreement on Detainers" to the Complainant or legally certify as to the date on which he did so and include supporting documentation.
3. **The Custodian shall comply with item Nos. 1 and 2 above within five (5) business days from receipt of the Council's Interim Order with appropriate redactions (if necessary), including a detailed document index explaining the lawful basis for each redaction, and simultaneously provide certified confirmation of compliance, in accordance with N.J. Court Rule 1:4-4,⁴ to the Executive Director.⁵**
4. The Council defers analysis of whether the original Custodian knowingly and willfully violated OPRA and unreasonably denied access under the totality of the circumstances pending the Custodian's compliance with the Council's Interim Order.

Procedural History:

On February 25, 2015, the Council distributed its Interim Order to all parties.

On March 11, 2015, the Custodian responded to the Council's Interim Order. The Custodian certified that he initially provided the responsive records to the Complainant on January 5, 2015. However, the Custodian certified that he was resending same to the Complainant on this day.

Analysis

Compliance

At its February 24, 2015 meeting, the Council ordered the Custodian to either certify to the date and time that records were provided to the Complainant (with supporting documentation) or provide same pursuant to this Order. Further, the Council ordered the Custodian to submit certified confirmation of compliance, in accordance with N.J. Court Rule 1:4-4, to the Executive Director. On February 25, 2015, the Council distributed its Interim Order

⁴ "I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment."

⁵ Satisfactory compliance requires that the Custodian deliver the record(s) to the Complainant in the requested medium. If a copying or special service charge was incurred by the Complainant, the Custodian must certify that the record has been *made available* to the Complainant but the Custodian may withhold delivery of the record until the financial obligation is satisfied. Any such charge must adhere to the provisions of N.J.S.A. 47:1A-5.

to all parties, providing the Custodian five (5) business days to comply with the terms of said Order. Thus, the Custodian's response was due by close of business on March 4, 2015.

On March 11, 2015, five (5) business days the expiration of the time frame to comply, the Custodian responded to the Council's Order certifying that, although he initially provided the responsive records to the Complainant on January 5, 2015, he was resending same to the Complainant.

Therefore, the Custodian failed to comply fully with the Council's February 24, 2015 Interim Order because he did not provide his response to the Complainant or certified confirmation of compliance to the Executive Director within the prescribed time frame. However, because the Custodian provided the responsive records to the Complainant, no further action is required.

Knowing & Willful

OPRA states that "[a] public official, officer, employee or custodian who knowingly or willfully violates [OPRA], and is found to have unreasonably denied access under the totality of the circumstances, shall be subject to a civil penalty . . ." N.J.S.A. 47:1A-11(a). OPRA allows the Council to determine a knowing and willful violation of the law and unreasonable denial of access under the totality of the circumstances. Specifically OPRA states ". . . [i]f the council determines, by a majority vote of its members, that a custodian has knowingly and willfully violated [OPRA], and is found to have unreasonably denied access under the totality of the circumstances, the council may impose the penalties provided for in [OPRA] . . ." N.J.S.A. 47:1A-7(e).

Certain legal standards must be considered when making the determination of whether the Custodian's actions rise to the level of a "knowing and willful" violation of OPRA. The following statements must be true for a determination that the Custodian "knowingly and willfully" violated OPRA: the Custodian's actions must have been much more than negligent conduct (Alston v. City of Camden, 168 N.J. 170, 185 (2001)); the Custodian must have had some knowledge that his actions were wrongful (Fielder v. Stonack, 141 N.J. 101, 124 (1995)); the Custodian's actions must have had a positive element of conscious wrongdoing (Berg v. Reaction Motors Div., 37 N.J. 396, 414 (1962)); the Custodian's actions must have been forbidden with actual, not imputed, knowledge that the actions were forbidden (*id.*; Marley v. Borough of Palmyra, 193 N.J. Super. 271, 294-95 (Law Div. 1993)); the Custodian's actions must have been intentional and deliberate, with knowledge of their wrongfulness, and not merely negligent, heedless, or unintentional (ECES v. Salmon, 295 N.J. Super. 86, 107 (App. Div. 1996)).

Here, although the original Custodian timely responded to the Complainant granting access to the responsive records pending payment, he unlawfully denied access to the Promis Gavel records by not providing same thereafter (as the current Custodian did on March 11, 2015). Further, the current Custodian failed to comply fully with the Council's February 24, 2015 Interim Order by not performing the required actions within the prescribed time frame. However, the Custodian did provide the responsive records to the Complainant on March 11,

2015. Additionally, the evidence of record does not indicate that either the original or current Custodians' violations of OPRA had a positive element of conscious wrongdoing or were intentional and deliberate. Therefore, neither Custodians' actions rise to the level of a knowing and willful violation of OPRA and unreasonable denial of access under the totality of the circumstances.

Conclusions and Recommendations

The Executive Director respectfully recommends the Council find that:

1. The Custodian failed to comply fully with the Council's February 24, 2015 Interim Order because he did not provide his response to the Complainant or certified confirmation of compliance to the Executive Director within the prescribed time frame. However, because the Custodian provided the responsive records to the Complainant, no further action is required.
2. Although the original Custodian timely responded to the Complainant granting access to the responsive records pending payment, he unlawfully denied access to the Promis Gavel records by not providing same thereafter (as the current Custodian did on March 11, 2015). Further, the current Custodian failed to comply fully with the Council's February 24, 2015 Interim Order by not performing the required actions within the prescribed time frame. However, the Custodian did provide the responsive records to the Complainant on March 11, 2015. Additionally, the evidence of record does not indicate that either the original or current Custodians' violations of OPRA had a positive element of conscious wrongdoing or were intentional and deliberate. Therefore, neither Custodian's actions rise to the level of a knowing and willful violation of OPRA and unreasonable denial of access under the totality of the circumstances.

Prepared By: Frank F. Caruso
Communications Specialist/Resource Manager

Approved By: Dawn R. SanFilippo
Deputy Executive Director

March 24, 2015



State of New Jersey
GOVERNMENT RECORDS COUNCIL

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PO BOX 819
TRENTON, NJ 08625-0819

CHRIS CHRISTIE
Governor

KIM GUADAGNO
Lt. Governor

RICHARD E. CONSTABLE, III
Commissioner

INTERIM ORDER

February 24, 2015 Government Records Council Meeting

Al-Qaadir Green
Complainant

Complaint No. 2014-101

v.

County of Essex
Custodian of Record

At the February 24, 2015 public meeting, the Government Records Council (“Council”) considered the February 17, 2015 Findings and Recommendations of the Executive Director and all related documentation submitted by the parties. The Council, by a majority vote, adopted the entirety of said findings and recommendations. The Council, therefore, finds that:

1. The evidence of record supports that the original Custodian timely responded granting access to responsive records upon payment of the applicable copy costs. Further, the evidence supports that New Jersey State Prison released the Complainant’s payment to the County on January 21, 2014. However, the original Custodian may have unlawfully denied access to the responsive records by failing to disclose same after receipt of payment. N.J.S.A. 47:1A-6; Conley v. NJ Dep’t of Corrections, GRC Complaint No. 2012-313 *et seq.* (September, 2013). The Custodian must either confirm receipt of the Complainant’s payment and provide him with the responsive records or legally certify to the date the original Custodian received the Complainant’s payment and disclosed the responsive records to him to include supporting documentation.
2. In the absence of any arguments regarding the disclosability of the “Interstate Agreement on Detainers”, and because Ms. Simms released same to the Custodian for disclosure on January 2, 2015, the Council should decline to address the disclosability of same at this time. However, the Custodian must disclose the “Interstate Agreement on Detainers” to the Complainant or legally certify as to the date on which he did to include supporting documentation.
3. **The Custodian shall comply with item Nos. 1 and 2 above within five (5) business days from receipt of the Council’s Interim Order with appropriate redactions (if necessary), including a detailed document index explaining the lawful basis for each redaction, and simultaneously provide certified confirmation of**



compliance, in accordance with N.J. Court Rule 1:4-4,¹ to the Executive Director.²

4. The Council defers analysis of whether the original Custodian knowingly and willfully violated OPRA and unreasonably denied access under the totality of the circumstances pending the Custodian's compliance with the Council's Interim Order.

Interim Order Rendered by the
Government Records Council
On The 24th Day of February, 2015

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: February 25, 2015

¹ "I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment."

² Satisfactory compliance requires that the Custodian deliver the record(s) to the Complainant in the requested medium. If a copying or special service charge was incurred by the Complainant, the Custodian must certify that the record has been *made available* to the Complainant but the Custodian may withhold delivery of the record until the financial obligation is satisfied. Any such charge must adhere to the provisions of N.J.S.A. 47:1A-5.

**STATE OF NEW JERSEY
GOVERNMENT RECORDS COUNCIL**

**Findings and Recommendations of the Executive Director
February 24, 2015 Council Meeting**

**Al-Qaadir Green¹
Complainant**

GRC Complaint No. 2014-101

v.

**County of Essex²
Custodial Agency**

Records Relevant to Complaint: Hardcopies via U.S. mail of

1. The Complainant's "Interstate Agreement on Detainers" ("IAD").
2. The Complainant's New Jersey Promis Gavel indictment detail and event detail regarding Indictment No. 01-10-4344-I.

Custodian of Record: Michael Venezia³

Request Received by Custodian: January 15, 2013 and December 20, 2013

Response Made by Custodian: January 22, 2013 and December 26, 2013

GRC Complaint Received: March 6, 2014

Background⁴

Request and Response:

On an unknown date, the Complainant submitted Open Public Records Act ("OPRA") request to the original Custodian seeking the above-mentioned records. On January 15, 2013, the original Custodian forwarded the request to Ms. Debra Simms, Esq., Executive Assistant Prosecutor for the Essex County Prosecutor's Office ("ECPO"). On January 22, 2013, Ms. Simms advised the original Custodian that she was denying access to the responsive IAD as a criminal investigatory record, a record containing "inter-agency or intra-agency advisory, consultative or deliberative" ("ACD") material, and because the Complainant's request was invalid because it failed to identify a case number. On the same date, the original Custodian forwarded Ms. Simms' response to the Complainant.

¹ No legal representation listed on record.

² No legal representation listed on record.

³ The original Custodian of Record was Al Fusco.

⁴ 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.

On December 7, 2013, the Complainant submitted a second (2nd) OPRA request to the original Custodian seeking the above-mentioned records. On December 20, 2013, the original Custodian forwarded the Complainant's OPRA request to the ECPO. On December 26, 2013, Ms. Simms, Esq., provided Promis Gavel and event detail records to the original Custodian for disclosure.

On December 26, 2013, the original Custodian responded in writing advising the Complainant that he located responsive records and will provide same upon receipt of \$4.30 (\$1.60 for the records and \$2.70 for shipping). On January 15, 2014, the Complainant caused payment in the amount of \$4.30 to the original Custodian from his inmate account. On January 21, 2014, the New Jersey State Prison ("NJSP") Business Office released the check to the County of Essex.

Denial of Access Complaint:

On March 6, 2014, the Complainant filed a Denial of Access Complaint with the Government Records Council ("GRC"). Regarding OPRA request No. 1, the Complainant contended that the IAD was not criminal investigatory in nature because it was not part of the ECPO's criminal file. The Complainant asserted that the IAD was a contract entered into in accordance with N.J.S.A. 2A:159A-1 et seq.

Regarding OPRA request No. 2, the Complainant asserted that, notwithstanding that NJSP released his payment to the County on January 21, 2014, he did not receive the responsive records.

Statement of Information:

On March 28, 2014, the GRC sent the Custodian a request for a Statement of Information ("SOI"). On April 16, 2014, via letter, the GRC advised the Custodian of his failure to submit timely an SOI and provided him three (3) additional business days to respond. The Custodian failed to submit an SOI to the GRC.

Additional Submissions:

On December 1, 2014, the Custodian e-mailed the GRC attaching the Complainant's second (2nd) OPA request, Ms. Simms' letter, the records responsive to this request and the original Custodian's December 26, 2013 response to the Complainant.

On the same day, the GRC e-mailed the Custodian, recapitulating an earlier conversation in which the Custodian agreed to submit additional documentation regarding the original Custodian's responses to the Complainant. The GRC requested that the Custodian include a legal certification as part of this transmission. On December 15, 2014, the GRC again e-mailed the Custodian seeking the additional documentation and legal certification.

On December 16, 2014, the Custodian responded to the GRC's request for additional information. The Custodian certified that Essex County ("County") received the Complainant's

OPRA requests on January 15, and December 20, 2013 respectively. The Custodian certified that the original Custodian forwarded both OPRA requests to Ms. Simms, who responded back on January 22, and December 26, 2013 respectively. The Custodian certified that the original Custodian sent Ms. Simms' responses to the Complainant on the same day as receipt of both.

On January 2, 2015, Ms. Simms sent a letter to the Custodian advising that, based upon a recent inquiry from the GRC, the ECPO reconsidered its denial to the OPRA request No. 1 and conducted an exhaustive search to locate the IAD. Ms. Simms noted that same is attached and should be forwarded to the Complainant.

Analysis

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.

OPRA request No. 1

OPRA provides that "[a] copy or copies of a government record may be purchased by any person upon payment of the fee prescribed by law or regulation." N.J.S.A. 47:1A-5(b).

In Ortiz v. NJ Dep't of Corrections, GRC Complaint No. 2007-101 (November 2008), the Council referred to Paff v. City of Plainfield, GRC Complaint No. 2006-54 (July 2006), in reaffirming that the custodian was "not required to release the requested records until payment is received . . ." Id. at 8. The Council subsequently held in Leak v. Union Cnty. Prosecutor's Office, GRC Complaint No. 2007-148 (June 2009), that the custodian had complied in part with the Council's February 25, 2009 Interim Order "by advising that the requested records would be provided upon payment of copying costs . . . pursuant to N.J.S.A. 47:1A-5(b), [Paff], and Mejias v. NJ Dep't of Corrections, GRC Complaint No. 2007-181 (July 2008)." Id. at 4. However, once payment is received, the Custodian is obligated to disclose responsive records as soon as possible. *See* Conley v. NJ Dep't of Corrections, GRC Complaint No. 2012-313 *et seq.* (September, 2013)(holding that the custodian's failure to provide records up to forty (40) days after receipt of payment resulted in a "deemed" denial).

Here, the original Custodian timely responded by offering disclosure of records responsive to OPRA request No. 1 pending payment of the appropriate copy cost of \$4.30. The evidence of record indicates that NJSP released a check to the County in that amount on January 21, 2014. However, there is no evidence in the record supporting that the original Custodian received the check or that any records were provided to the Complainant. Based on the foregoing, the GRC cannot determine whether the original Custodian successfully fulfilled the Complainant's OPRA request.

Therefore, the evidence of record supports that the original Custodian timely responded granting access to responsive records upon payment of the applicable copy costs. Further, the evidence supports that NJSP released the Complainant's payment to the County on January 21, 2014. However, the original Custodian may have unlawfully denied access to the responsive records by failing to disclose same after receipt of payment. N.J.S.A. 47:1A-6; Conley, GRC 2012-313. The Custodian must either confirm receipt of the Complainant's payment and provide him with the responsive records or legally certify to the date the original Custodian received the Complainant's payment and disclosed the responsive records to him to include supporting documentation.

OPRA Request No. 2

In VanBree v. Bridgewater Twp. Police Dep't (Somerset), GRC Complaint No. 2014-122 (October 2014), the custodian initially denied access to one of the complainant's request items based on an exemption in N.J.S.A. 47:1A-1.1. However, during the pendency of the complaint, the custodian disclosed same to the complainant and made no substantial arguments in the SOI regarding her initial denial. The Council henceforth determined that "[in] the absence of detailed arguments regarding the disclosability of these policies, and because same were provided to the Complainant, the Council should decline to address the disclosability of same at this time." Id. at 5.

In the instant matter, the original Custodian initially denied access to the IAD based on a response from Ms. Simms. Therein, Ms. Simms stated that the record was criminal investigatory in nature and contained ACD material. Further, Ms. Simms asserted that the request was invalid because it failed to identify a specific case. Following the filing of this complaint, the original Custodian did not submit an SOI providing arguments in support of his denial. However, on January 2, 2015, Ms. Simms sent a letter to the Custodian advising that she reconsidered her denial of access and was providing a copy of the IAD to him for disclosure to the Complainant. There is no evidence in the record to determine whether the Custodian actually forwarded same to the Complainant.

The facts of this complaint are similar to VanBree, in that the original Custodian initially denied access to the IAD based on a cited exemption. Further, the original Custodian did not make a substantial argument regarding this denial because he failed to submit an SOI. Finally, Ms. Simms provided the record to the Custodian for disclosure on January 2, 2015 in an apparent reversal of the initial denial of access. However, where this complaint departs from VanBree, is that there is no evidence to support that the Custodian forwarded the IAD to the Complainant.

Therefore, in the absence of any arguments regarding the disclosability of the IAD, and because Ms. Simms released same to the Custodian for disclosure on January 2, 2015, the Council should decline to address the disclosability of same at this time. However, the Custodian must disclose the IAD to the Complainant or legally certify as to the date on which he did to include supporting documentation.

Knowing & Willful

The Council defers analysis of whether the original Custodian knowingly and willfully violated OPRA and unreasonably denied access under the totality of the circumstances pending the Custodian's compliance with the Council's Interim Order.

Conclusions and Recommendations

The Executive Director respectfully recommends the Council find that:

1. The evidence of record supports that the original Custodian timely responded granting access to responsive records upon payment of the applicable copy costs. Further, the evidence supports that New Jersey State Prison released the Complainant's payment to the County on January 21, 2014. However, the original Custodian may have unlawfully denied access to the responsive records by failing to disclose same after receipt of payment. N.J.S.A. 47:1A-6; Conley v. NJ Dep't of Corrections, GRC Complaint No. 2012-313 *et seq.* (September, 2013). The Custodian must either confirm receipt of the Complainant's payment and provide him with the responsive records or legally certify to the date the original Custodian received the Complainant's payment and disclosed the responsive records to him to include supporting documentation.
2. In the absence of any arguments regarding the disclosability of the "Interstate Agreement on Detainers", and because Ms. Simms released same to the Custodian for disclosure on January 2, 2015, the Council should decline to address the disclosability of same at this time. However, the Custodian must disclose the "Interstate Agreement on Detainers" to the Complainant or legally certify as to the date on which he did to include supporting documentation.
3. **The Custodian shall comply with item Nos. 1 and 2 above within five (5) business days from receipt of the Council's Interim Order with appropriate redactions (if necessary), including a detailed document index explaining the lawful basis for each redaction, and simultaneously provide certified confirmation of compliance, in accordance with N.J. Court Rule 1:4-4,⁵ to the Executive Director.⁶**
4. The Council defers analysis of whether the original Custodian knowingly and willfully violated OPRA and unreasonably denied access under the totality of the circumstances pending the Custodian's compliance with the Council's Interim Order.

⁵ "I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment."

⁶ Satisfactory compliance requires that the Custodian deliver the record(s) to the Complainant in the requested medium. If a copying or special service charge was incurred by the Complainant, the Custodian must certify that the record has been *made available* to the Complainant but the Custodian may withhold delivery of the record until the financial obligation is satisfied. Any such charge must adhere to the provisions of N.J.S.A. 47:1A-5.

Prepared By: Frank F. Caruso
Communications Specialist/Resource Manager

Approved By: Dawn R. SanFilippo
Deputy Executive Director

February 17, 2015