



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

March 31, 2015 Government Records Council Meeting

Robert A. Verry
Complainant

Complaint No. 2014-142

v.

Franklin Fire District No. 1 (Somerset)
Custodian of Record

At the March 31, 2015 public meeting, the Government Records Council (“Council”) considered the March 24, 2015 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 Custodian did not bear his burden of proof that he timely responded to the Complainant’s OPRA request. N.J.S.A. 47:1A-6. As such, the Custodian’s failure to respond in writing to the 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 dated October 31, 2007).
2. The Custodian did not unlawfully deny access to the requested software manual cover page for the e-mail archival software utilized by Network Blade to provide e-mail archival services on behalf of the District. N.J.S.A. 47:1A-6; Hittinger v. NJ Transit, GRC Complaint No. 2013-324 (July 2014). Specifically, the Custodian was not obligated to provide the software manual cover page from Network Blade, as it was not created, maintained, or kept on file on behalf the District, and thus does not meet the definition of a “government record” under OPRA. N.J.S.A. 47:1A-1.1; Owoh v. West Windsor-Plainsboro Sch. Dist. (Mercer), GRC Complaint Nos. 2014-16, 2014-62 & 2014-81 (September 2014).
3. Although the Custodian’s failure to respond in writing in a timely manner resulted in a “deemed” denial, the Custodian did not unlawfully deny access to the software manual cover page. Additionally, the evidence of record does not indicate that the Custodian’s violation of OPRA had a positive element of conscious wrongdoing or was intentional and deliberate. Therefore, the Custodian’s actions do not rise to the



level of a knowing and willful violation of OPRA and unreasonable denial of access under the totality of the circumstances.

4. The Complainant has not achieved the desired result because the complaint did not bring about a change (voluntary or otherwise) in the custodian's conduct. Teeters v. DYFS, 387 N.J. Super. 423 (App. Div. 2006). Additionally, no factual causal nexus exists between the Complainant's filing of a Denial of Access Complaint and the relief ultimately achieved. Mason v. City of Hoboken and City Clerk of the City of Hoboken, 196 N.J. 51 (2008). Specifically, the Custodian did not unlawfully deny access to the August 13, 2013 executive session resolution. Therefore, the Complainant is not a prevailing party entitled to an award of a reasonable attorney's fee. See N.J.S.A. 47:1A-6, Teeters, 387 N.J. Super. at 432, and Mason, 196 N.J. at 51.

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**

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

**Robert A. Verry¹
Complainant**

GRC Complaint No. 2014-142

v.

**Franklin Fire District No. 1 (Somerset)²
Custodian of Records**

Records Relevant to Complaint: Electronic copy of:

Instruction manual cover page for the Fire District's electronic e-mail archiving system.

Custodian of Record: Tim Szymborski
Request Received by Custodian: November 4, 2013
Response Made by Custodian: November 26, 2013
GRC Complaint Received: March 25, 2014

Background³

Request and Response:

On November 4, 2013, the Complainant submitted an Open Public Records Act ("OPRA") request to the Custodian seeking the above-mentioned records. On November 26, 2013, fourteen (14) business days later, the Custodian responded, in writing, stating that because Franklin Fire District No. 1 ("District" or "the District") does not have access to the e-mail archiving system ("archival service") maintained by Network Blade, the contracting vendor, the District does not maintain or keep on file the document requested. Therefore, the Custodian contended that no responsive government record exists.

Denial of Access Complaint:

On March 25, 2014, the Complainant filed a Denial of Access Complaint with the Government Records Council ("GRC"). The Complainant argued that custodians are charged with retrieving and producing responsive records, regardless of whether the responsive record is maintained in the custodian's physical location. The Complainant also contended that the cover

¹ Represented by John A. Bermingham, Jr., Esq. (Mount Bethel, PA).

² Represented by Dominic DiYanni, Esq. of Eric M. Bernstein & Associates, LLC (Warren, NJ).

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.

page is a government record notwithstanding its origination and location. The Complainant also stated that there have been several complaints filed against the District with the GRC, and both the Custodian and his counsel have established a pattern of deliberate, intentional, and willful conduct.

The Complainant requested the GRC to find that 1) the Custodian violated OPRA by failing to provide the government records within seven (7) business days; 2) order the Custodian to immediately release all responsive records; 3) find that the Complainant is prevailing party and order an award of reasonable attorney's fees pursuant to N.J.S.A. 47:1A-6; and 4) find that the Custodian knowingly and willfully violated OPRA and impose civil penalties pursuant to N.J.S.A. 47:1A-11.

Statement of Information:

On April 22, 2014, the Custodian filed a Statement of Information ("SOI"). The Custodian certified that the archival service that is the subject of the requested cover page is utilized and maintained by Network Blade, not the District. The Custodian further certified that Network Blade directly utilizes the archival service, and the District neither controls nor maintains the requested record. The Custodian surmised that should this cover page be deemed a government record, then all documents owned and maintained by any individual or entity that contracts with the District would be government records subject to OPRA. The Custodian contended that such a situation was not intended under OPRA.

Additional Submissions:

On May 23, 2014, the Complainant submitted a letter brief in rebuttal to the Custodian's SOI. The Complainant contested the Custodian's claim that the archival service is controlled and maintained solely by Network Blade, rather than the District itself. The Complainant provided copies of invoices wherein the District purchased "Email Archiving Service" and "Email Archiving System," from Network Blade, spanning the years 2013-2015. The Complainant contended that these invoices, combined with information gleaned from the archival service company's website, show that Network Blade is only an intermediary between the archival service company and the District. Thus, according to the Complainant, it is the District, not Network Blade, who owns the archival service.

On February 5, 2015, the GRC submitted a request for additional information to the Custodian. The GRC inquired as to whether the archival service invoiced to the District is utilized for the exclusive use of the District or whether Network Blade utilizes the archival service for all private/public contracts. After failing to receive a response within the allotted time frame, the GRC submitted a notice letter to the Custodian on February 13, 2015.

On February 18, 2015, the Custodian responded to the GRC's request for additional information. The Custodian certified that the archival service utilized by Network Blade is not for the exclusive use of the District.

Analysis

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 dated October 31, 2007).

The evidence in the record demonstrates that the Custodian failed to respond to the Complainant's request until fourteen (14) business days later, beyond the statutorily mandated seven (7) business days. Thus, the Custodian clearly violated OPRA by failing to respond in writing in a timely manner.

The Custodian did not bear his burden of proof that he timely responded to the Complainant's OPRA request. N.J.S.A. 47:1A-6. As such, the Custodian's failure to respond in writing to the 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, GRC No. 2007-11.

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 defines a "government record" as:

"[A]ny 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 by any officer[.]"

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.

(Emphasis added.) N.J.S.A. 47:1A-1.1.

In Burnett v. Cnty. of Gloucester, 415 N.J. Super. 506 (App. Div. 2010), the custodian claimed that records in possession of a third-party contractor executed on behalf of an agency are not subject to access. The Appellate Division reviewed the Law Division's ruling, interpreting Bent v. Twp. of Stafford Police Dep't, 381 N.J. Super. 30 (App. Div. 2005) and holding that the defendant did not have to disclose the records responsive to the plaintiff's OPRA request because the records were not in the defendant's possession. The Appellate Division found that the motion judge interpreted Bent, *supra* too broadly. The Appellate Division held:

“We find the circumstances in Bent, *supra*, to be far removed from those existing in the present matter because . . . the settlement agreements at issue were made by or on behalf of the [defendants] in the course of its official business. Were we to conclude otherwise, a governmental agency seeking to protect its records from scrutiny could simply . . . relinquish possession to [third] parties, thereby thwarting the policy of transparency that underlies OPRA . . . We reject any narrowing legal position in this matter that would provide grounds for impeding access to such documents.” Id. at 517.

However, in Hittinger v. NJ Transit, GRC Complaint No. 2013-324 (July 2014), the complainant sought, among other records, contracts and agreements between an advertising agency under contract with NJ Transit and vendors who contracted with said agency. In Burnett, the contractor was an insurance broker, who executed settlement agreements on behalf of custodian. 415 N.J. Super. at 506. The Council distinguished the relationship between the advertising agency and NJ Transit, finding that unlike the custodian in Burnett, NJ Transit was not bound by, nor has any discretion over, contracts made between the advertising agency and client vendors. Hittinger, GRC No. 2013-324. The terms of the agreement between NJ Transit and the advertising agency provided that the agency accepts full responsibility for the procurement of advertising. Id. at 3. The Council therefore held that NJ Transit was not obligated to obtain responsive records pertaining to agreements and communications between the advertising agency and client vendors. Id. at 7.

Additionally, in Owoh v. West Windsor-Plainsboro Sch. Dist. (Mercer), GRC Complaint Nos. 2014-16, 2014-62 & 2014-81 (September 2014), the complainant sought the personnel records of employees at private, for-profit businesses under contract by the custodian. The Council concluded that because these are private, for-profit businesses, “it is clear that [they] do not make or maintain their own personnel records on behalf of the District.” Id. at 8. The Council held that such records are not subject to OPRA, because they must be created and maintained “on behalf of” the custodian. Id. at 8 (*citing* Burnett, 415 N.J. Super. at 516-517).

The GRC is satisfied that the relationship between Network Blade and the District are similar to the facts in Hittinger and Owoh rather than Burnett. Like the relationship between the advertising agency and NJ Transit in Hittinger, the District contracted with Network Blade to procure any and all IT services the District requires. The invoices provided by the Complainant show that the District purchased an IT service, in this case e-mail archiving, provided by Network Blade. It is then the sole responsibility of Network Blade to secure the means of

providing that service, just as it was the sole responsibility of the advertising agency to procure vendors to advertise on NJ Transit buses and trains.

Additionally, the Custodian certified that the District does not have control over which software vendor Network Blade chooses to provide the actual archival service. Furthermore, as the Custodian certified in response to the GRC's request for additional information, Network Blade utilizes the same archival service for other public/private clients. Thus, similar to the requested employee personnel records of private, for-profit businesses in Owoh, it cannot be said that the manual for the archival service was created and maintained on behalf of the District when Network Blade utilizes the archival service for other clients. Rather, the evidence suggests the manual was created and maintained on behalf of Network Blade.

The Complainant cited Carter v. Franklin Fire Dist. No. 2 (Somerset), GRC Complaint No. 2011-319 (Interim Order dated March 22, 2013), as on point in this matter. There, the complainant sought the cover page of the manual for the Franklin Fire District No. 2's ("Franklin Fire") electronic check system. Id. at 1. The Council held that the cover page was a government record since it was kept on file in the course of official business. Id. at 2. However, in Carter, Franklin Fire directly purchased the software and utilized same in-house. It is therefore logical to conclude that the manual for the software would be kept on file by Franklin Fire, as the software itself is utilized directly by them. In the instant matter, Network Blade has sole access to the software it uses to provide the archival service to the District, which explains why the software manual is kept on file with Network Blade, rather than the District.

The Custodian did not unlawfully deny access to the requested software manual cover page for the e-mail archival software utilized by Network Blade to provide e-mail archival services on behalf of the District. N.J.S.A. 47:1A-6; Hittinger, GRC No. 2013-324. Specifically, the Custodian was not obligated to provide the software manual cover page from Network Blade, as it was not created, maintained, or kept on file on behalf the District, and thus does not meet the definition of a "government record" under OPRA. N.J.S.A. 47:1A-1.1; Owoh, GRC No. 2014-16, 2014-62 & 2014-81.

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)).

Although the Custodian’s failure to respond in writing in a timely manner resulted in a “deemed” denial, the Custodian did not unlawfully deny access to the software manual cover page. Additionally, the evidence of record does not indicate that the Custodian’s violation of OPRA had a positive element of conscious wrongdoing or was intentional and deliberate. Therefore, the Custodian’s actions do not rise to the level of a knowing and willful violation of OPRA and unreasonable denial of access under the totality of the circumstances.

Prevailing Party Attorney’s Fees

OPRA provides 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 . . . ; or in lieu of filing an action in Superior Court, file a complaint with the Government Records Council . . . A requestor who prevails in any proceeding shall be entitled to a reasonable attorney's fee.

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

In Teeters v. DYFS, 387 N.J. Super. 423 (App. Div. 2006), the Court held that a complainant is a “prevailing party” if he achieves the desired result because the complaint brought about a change (voluntary or otherwise) in the custodian’s conduct. Id. at 432. Additionally, the Court held that attorney’s fees may be awarded when the requestor is successful (or partially successful) via a judicial decree, a quasi-judicial determination, or a settlement of the parties that indicates access was improperly denied and the requested records are disclosed. Id.

Additionally, the New Jersey Supreme Court has ruled on the issue of “prevailing party” attorney’s fees. In Mason v. City of Hoboken and City Clerk of the City of Hoboken, 196 N.J. 51 (2008), the Supreme Court discussed the catalyst theory, “which posits that a plaintiff is a ‘prevailing party’ if it achieves the desired result because the lawsuit brought about a voluntary change in the defendant’s conduct.” Mason, 196 N.J. at 71, (quoting Buckhannon Bd. & Care Home v. West Virginia Dep’t of Health & Human Res., 532 U.S. 598, 131 S. Ct. 1835, 149 L. Ed. 2d 855 (2001)). In Buckhannon, the Supreme Court stated that the phrase “prevailing party”

is a legal term of art that refers to a “party in whose favor a judgment is rendered.” (quoting Black’s Law Dictionary 1145 (7th ed. 1999)). The Supreme Court rejected the catalyst theory as a basis for prevailing party attorney fees, in part because “[i]t allows an award where there is no judicially sanctioned change in the legal relationship of the parties,” Id. at 605, 121 S. Ct. at 1840, 149 L. Ed. 2d at 863, but also over concern that the catalyst theory would spawn extra litigation over attorney’s fees. Id. at 609, 121 S. Ct. at 1843, 149 L. Ed. 2d at 866.

However, the Court noted in Mason, that Buckhannon is binding only when counsel fee provisions under federal statutes are at issue. 196 N.J. at 72, *citing* Teeters, 387 N.J. Super. at 429; *see, e.g.*, Baer v. Klagholz, 346 N.J. Super. 79 (App. Div. 2001) (applying Buckhannon to the federal Individuals with Disabilities Education Act), *certif. denied*, 174 N.J. 193 (2002). “But in interpreting New Jersey law, we look to state law precedent and the specific state statute before us. When appropriate, we depart from the reasoning of federal cases that interpret comparable federal statutes.” 196 N.J. at 73 (citations omitted).

The Mason Court accepted the application of the catalyst theory within the context of OPRA, stating that:

OPRA itself contains broader language on attorney’s fees than the former RTKL did. OPRA provides that “[a] requestor who prevails in any proceeding shall be entitled to a reasonable attorney’s fee.” N.J.S.A. 47:1A-6. Under the prior RTKL, “[a] plaintiff in whose favor such an order [requiring access to public records] issues . . . may be awarded a reasonable attorney’s fee not to exceed \$500.00.” N.J.S.A. 47:1A-4 (repealed 2002). The Legislature’s revisions therefore: (1) mandate, rather than permit, an award of attorney’s fees to a **prevailing party**; and (2) eliminate the \$500 cap on fees and permit a reasonable, and quite likely higher, fee award. Those changes expand counsel fee awards under OPRA.

Mason at 73-76 (2008).

The Court in Mason, further held that:

[R]equestors are entitled to attorney’s fees under OPRA, absent a judgment or an enforceable consent decree, when they can demonstrate (1) ‘a factual causal nexus between plaintiff’s litigation and the relief ultimately achieved’; and (2) ‘that the relief ultimately secured by plaintiffs had a basis in law.’ Singer v. State, 95 N.J. 487, 495, *cert denied* (1984).

Id. at 76.

Here, the Complainant contended that the Custodian had an obligation to obtain the cover page of a manual for software utilized by a private, for-profit business contracted to provide IT services for the Custodian. Hence, he requested that the GRC order the Custodian to obtain same. The Custodian, however, has not unlawfully denied access to the cover page because same is not a “government record” subject to access under OPRA.

Therefore, the Complainant has not achieved the desired result because the complaint did not bring about a change (voluntary or otherwise) in the custodian's conduct. Teeters, 387 N.J. Super. 432. Additionally, no factual causal nexus exists between the Complainant's filing of a Denial of Access Complaint and the relief ultimately achieved. Mason, 196 N.J. 51. Specifically, the cover page of a manual for an e-mail archiving software utilized by a private, for-profit business is not a "government record" subject to access under OPRA. Therefore, the Complainant is not a prevailing party entitled to an award of a reasonable attorney's fee. *See* N.J.S.A. 47:1A-6, Teeters, 387 N.J. Super. 432, and Mason, 196 N.J. 51.

Conclusions and Recommendations

The Executive Director respectfully recommends the Council find that:

1. The Custodian did not bear his burden of proof that he timely responded to the Complainant's OPRA request. N.J.S.A. 47:1A-6. As such, the Custodian's failure to respond in writing to the 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 dated October 31, 2007).
2. The Custodian did not unlawfully deny access to the requested software manual cover page for the e-mail archival software utilized by Network Blade to provide e-mail archival services on behalf of the District. N.J.S.A. 47:1A-6; Hittinger v. NJ Transit, GRC Complaint No. 2013-324 (July 2014). Specifically, the Custodian was not obligated to provide the software manual cover page from Network Blade, as it was not created, maintained, or kept on file on behalf the District, and thus does not meet the definition of a "government record" under OPRA. N.J.S.A. 47:1A-1.1; Owoh v. West Windsor-Plainsboro Sch. Dist. (Mercer), GRC Complaint Nos. 2014-16, 2014-62 & 2014-81 (September 2014).
3. Although the Custodian's failure to respond in writing in a timely manner resulted in a "deemed" denial, the Custodian did not unlawfully deny access to the software manual cover page. Additionally, the evidence of record does not indicate that the Custodian's violation of OPRA had a positive element of conscious wrongdoing or was intentional and deliberate. Therefore, the Custodian's actions do not rise to the level of a knowing and willful violation of OPRA and unreasonable denial of access under the totality of the circumstances.
4. The Complainant has not achieved the desired result because the complaint did not bring about a change (voluntary or otherwise) in the custodian's conduct. Teeters v. DYFS, 387 N.J. Super. 423 (App. Div. 2006). Additionally, no factual causal nexus exists between the Complainant's filing of a Denial of Access Complaint and the relief ultimately achieved. Mason v. City of Hoboken and City Clerk of the City of Hoboken, 196 N.J. 51 (2008). Specifically, the Custodian did not unlawfully deny

access to the August 13, 2013 executive session resolution. Therefore, the Complainant is not a prevailing party entitled to an award of a reasonable attorney's fee. *See* N.J.S.A. 47:1A-6, Teeters, 387 N.J. Super. at 432, and Mason, 196 N.J. at 51.

Prepared By: Samuel A. Rosado
Staff Attorney

Approved By: Dawn R. SanFilippo
Deputy Executive Director

March 24, 2015