



**State of New Jersey**  
DEPARTMENT OF COMMUNITY AFFAIRS  
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**PHILIP D. MURPHY**  
*Governor*

**LT. GOVERNOR SHEILA Y. OLIVER**  
*Commissioner*

**FINAL DECISION**

**March 27, 2018 Government Records Council Meeting**

Boris Boretsky  
Complainant

Complaint No. 2016-220

v.

Middlesex County Prosecutor's Office  
Custodian of Record

At the March 27, 2018 public meeting, the Government Records Council ("Council") considered the March 20, 2018 Findings and Recommendations of the Council Staff 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 lawfully denied access to Item no. 1 of the Complainant's OPRA request seeking audio recordings taken during the autopsy performed upon Saoule Moukhametova. N.J.S.A. 47:1A-6. The evidence in the record demonstrates that the Complainant was convicted of an indictable offense, that his victim was Saoule Moukhametova, and is thus prohibited from obtaining records containing her personal information, including medical history under OPRA. N.J.S.A. 47:1A-2.2(a). See Boretsky v. Middlesex Cnty. Medical Examiner's Office, GRC Complaint No. 2016-219 (January 2018). Accordingly, the Council declines to address whether the records are exempt under N.J.S.A. 47:1A-1.1.
2. The Custodian lawfully denied access to Item nos. 2 & 7 of the Complainant's OPRA request. N.J.S.A. 47:1A-6. Specifically, notes taken by medical examiners and law enforcement personnel, as well as correspondence between the victim and the Complainant, which pertain to the Complainant's criminal case are exempt from disclosure as criminal investigatory records under N.J.S.A. 47:1A-1.1. North Jersey Media Grp., Inc. v. Twp. of Lyndhurst, 229 N.J. 541 (2017); O'Shea v. Twp. of West Milford, 410 N.J. Super. 371 (App. Div. 2009); and Janeczko v. N.J. Dep't of Law and Pub. Safety, Div. of Criminal Justice, GRC Complaint Nos. 2002-79 and 2002-80 (June 2004)
3. Although the Custodian denied access to Item nos. 3 & 4 on different grounds, the records were lawfully denied, as autopsy photographs and prints are not government records pursuant to N.J.S.A. 47:1A-1.1, and the circumstances of the request do not fall under the listed exceptions. N.J.S.A. 47:1A-6. Accordingly, the Council declines to address whether the records would be denied under N.J.S.A. 47:1A-2.2(a).



4. Although the Custodian denied access to Item no. 6 on other grounds, the requested records were lawfully denied. N.J.S.A. 47:1A-6. Specifically, the requested photographs are explicitly exempt from disclosure under OPRA pursuant to N.J.S.A. 47:1A-9(a) and Executive Order No. 69 (Gov. Whitman, 1997). See Barkley v. Essex Cnty. Prosecutor's Office, GRC Complaint No. 2011-221 (February 2013).

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 27<sup>th</sup> Day of March, 2018

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: March 29, 2018**

**STATE OF NEW JERSEY  
GOVERNMENT RECORDS COUNCIL**

**Findings and Recommendations of the Council Staff  
March 27, 2018 Council Meeting**

**Boris Boretsky<sup>1</sup>  
Complainant**

**GRC Complaint No. 2016-220**

**v.**

**Middlesex County Prosecutor's Office<sup>2</sup>  
Custodial Agency**

**Records Relevant to Complaint:**

1. Audio tape (Certified copy and transcript) of contemporaneous recording of procedures performed in accordance with the Forensic Autopsy Protocol by Assistant Medical Examiner, Middlesex County, Dr. Andrew L. Falzon, ME: No. A-02-063, during the Autopsy on the body of Saoule Moukhtametova conducted on March 4, 2002, Case ID No. 12-02-0316.
2. All notes, if any, taken by either: Medical Examiner Dr. Falzon; Investigator James O'Brien of the Middlesex County Prosecutor's Office; Detective James Ryan of the South Brunswick Police Department; and Forensic Technician James C. Jones of the Middlesex County Medical Examiner Office.
3. All autopsy photographs in color.
4. Single frontal view chest X-Ray of Saoule Moukhametova.
5. Animations, stills only, of the human chest created by Dr. James R. Lauridson of Alabama.
6. All photographs (in color) of the interior, exterior and aerial views of the defendant's residence at 978 Ridge Road, Monmouth Junction, New Jersey.
7. Letter from Saoule Moukhametova to defendant Boris Boretsky dated February 2002 typed in Cyrillic alphabet. (This letter is inside a yellow manila envelope together with the deed to the marital residence.
8. All e-mail communication between former Assistant Prosecutor Lawrence West, deceased, and Assistant Medical Examiner, Middlesex County Dr. Andrew L. Falzon, between the dates of March 4, 2002 and November 7, 2002, related to the Autopsy and/or autopsy report and its finding, in connection with the criminal case entitled State v. Boris Boretsky, Ind. No. 02-05-00642-I.

**Custodian of Record:** James E. O'Neill<sup>3</sup>  
**Request Received by Custodian:** July 6, 2016  
**Response Made by Custodian:** July 15, 2016  
**GRC Complaint Received:** August 10, 2016

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<sup>1</sup> No legal representation listed on record.

<sup>2</sup> Represented by Jeanne-Marie Scollo, Esq., of the Office of the Middlesex County Counsel (New Brunswick, NJ).

<sup>3</sup> The current Custodian is Andrea Boulton.

## **Background<sup>4</sup>**

### **Request and Response:**

On June 21, 2016, the Complainant submitted an Open Public Records Act (“OPRA”) request to the Custodian seeking the above-mentioned records. On July 15, 2016 the Custodian responded in writing, denying access to all the requested items for the reasons stated herein:

1. N.J.S.A. 47:1A-1.1, *et seq.* exempts autopsy reports as a protected document and not a public record. Additionally, N.J.A.C. 13:49-3.1 governs the release of autopsy reports for review.
2. Criminal investigatory records under N.J.S.A. 47:1A-1.1, *et seq.*
3. N.J.S.A. 47:1A-1.1, *et seq.*, Executive Order 69 prohibits the release of photographs taken during an autopsy, and N.J.A.C. 13:49-3.1 again governs the release of autopsy reports.
4. Exempt for the same reasons as Item nos. 1 and 3.
5. Could not determine what the Complainant was seeking.
6. Criminal investigatory records under N.J.S.A. 47:1A-1.1, *et seq.*
7. Criminal investigatory records under N.J.S.A. 47:1A-1.1, *et seq.*
8. N.J.S.A. 47:1A-1.1, *et seq.*, exempts inter-agency communication between the Middlesex County Medical Examiner’s Office (“MCME”) and the Middlesex County Prosecutor’s Office (“MCPO”) as a privileged or protected category under OPRA and therefore not a public record.

### **Denial of Access Complaint:**

On August 10, 2016, the Complainant filed a Denial of Access Complaint with the Government Records Council (“GRC”). The Complainant stated that the requested documents are in connection with a criminal matter entitled State v. Boretsky, Indictment No. 02-05-0642-I, in which he was the defendant. The Complainant also stated that he is serving time in prison as a result of a jury verdict in the criminal matter.

The Complainant asserted that he is entitled to the records according to R. 3:13-3. Additionally, the Complainant claimed that his trial counsel failed to provide him with the requested records in furtherance of his appeal resulting in his OPRA request.

### **Statement of Information:**

On September 30, 2016, the Custodian filed a Statement of Information (“SOI”). The Custodian certified that he received the OPRA request on July 6, 2016. The Custodian then certified that he responded in writing on July 15, 2016, denying access to the all the requested records.

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<sup>4</sup> 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 Council Staff the submissions necessary and relevant for the adjudication of this complaint.

In addition to the reasons set forth in his response to the Complainant, the Custodian argued that all of the requested records would qualify as criminal investigatory records under N.J.S.A. 47:1A-1.1, et seq. The Custodian cited Kovalick v. Somerset Cnty. Prosecutor's Office, 206 N.J. 581, 591 (2011), where the Court recognized that criminal investigatory records are exempt from disclosure under OPRA. The Custodian also noted that the Appellate Division identified certain records being held by law enforcement and the prosecution are criminal investigatory records and not subject to public access. North Jersey Media Grp., Inc. v. Twp. of Lyndhurst, 441 N.J. Super. 70 (App. Div. 2015), remanded on unrelated issue, 229 N.J. 541 (2017).

Furthermore, the Custodian referenced the GRC's decision in Janeczko v. Div. of Criminal Justice, GRC Complaint Nos. 2002-79 and 2002-80, which held that the criminal investigatory exemption applies to all investigations, "resolved and unresolved" and that OPRA makes no reference to the "status of the investigation" when considering whether the exemption applies.

### Additional Submissions

On February 2, 2018, the GRC requested additional information from the Custodian regarding his response to Item no. 5 of the Complainant's request. Specifically, the GRC asked whether the Custodian sought clarification of the records sought, the specific grounds for denying access to Item no. 5, and whether the reasons for denial in his SOI encompasses Item no. 5.

On February 26, 2018, the current Custodian responded to the GRC's request for additional information. The Custodian reviewed the response and SOI prepared by the former records custodian and certified to the answers to the inquiry. The Custodian stated that there was no request for clarification for Item no. 5; that Item no. 5 was denied because the former records custodian could not determine what the requester was seeking; and that Item no. 5 was not among those records that were denied access as criminal investigatory records as stated in the SOI.

### Analysis

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.

The Council is permitted to raise additional defenses regarding the disclosure of records pursuant to Paff v. Twp. of Plainsboro, No. A-2122-05T2, 2007 N.J. Super. Unpub. LEXIS 2135 (App. Div. Apr. 2, 2007), certif. denied, 193 N.J. 292 (2007).<sup>5</sup> In Paff, the complainant challenged the Council's authority to uphold a denial of access for reasons never raised by the custodian. Slip op. at 3. Specifically, the Council did not uphold the basis for the redactions cited by the custodian. Ibid. The Council, on its own initiative, determined that the Open Public Meetings Act prohibited the disclosure of the redacted portions to the requested executive session minutes. Id. at 2. The Council affirmed the custodian's denial to portions of the executive session minutes but for reasons other than those cited by the custodian. Paff, supra, slip op. at 2. The complainant argued that the

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<sup>5</sup> On appeal from Paff v. Township of Plainsboro, GRC Complaint No. 2005-29 (March 2006).

Council did not have the authority to do anything other than determine whether the custodian's cited basis for denial was lawful. Id. at 3-4. The Court held that:

The GRC has an independent obligation to “render a decision as to whether the record which is the subject of the complaint is a government record which must be made available for public access pursuant to’ OPRA . . . The GRC is not limited to assessing the correctness of the reasons given for the custodian’s initial determination; it is charged with determining if the initial decision was correct.”

[Id. at 4.]

The Court further stated that:

Aside from the clear statutory mandate to decide if OPRA requires disclosure, the authority of a reviewing agency to affirm on reasons not advanced by the reviewed agency is well established. Cf. Bryant v. City of Atlantic City, 309 N.J. Super. 596, 629-30 (App. Div. 1998) (citing Isko v. Planning Bd. of Livingston, 51 N.J. 162, 175 (1968) (lower court decision may be affirmed for reasons other than those given below)); Dwyer v. Erie Inv. Co., 138 N.J. Super. 93, 98 (App. Div. 1975) (judgments must be affirmed even if lower court gives wrong reason), certif. denied, 70 N.J. 142 (1976); Bauer v. 141-149 Cedar Lane Holding Co., 42 N.J. Super. 110, 121 (App. Div. 1956) (question for reviewing court is propriety of action reviewed, not the reason for the action), aff’d, 24 N.J. 139 (1957).

[Id. at 4-5.]

### **Unlawful Denial of Access**

The facts in this matter are substantially similar to a recently adjudicated matter in Boretsky v. Middlesex Cnty. Medical Examiner’s Office, GRC Complaint No. 2016-219 (January 2018). In the current matter, the Complainant sought the same records as he did in 2016-219, while also seeking additional records related to his criminal case. Id.

#### **Item No. 1**

OPRA restricts requestors convicted of an indictable offense from access to records containing personally identifying information of the requestor’s victim. N.J.S.A. 47:1A-2.2(a). Such information includes the victim’s medical history. Id. The requestor may only access this information to aid in their defense via court motion. N.J.S.A. 47:1A-2.2(b).

The Complainant sought from the Middlesex County Prosecutor’s Office (“MCPO”) any audio recording taken during an autopsy performed on Saoule Moukhametova. The Complainant sought the same records from the Middlesex County Medical Examiner’s Office (“MCME”) in Boretsky, GRC 2016-219. In that matter, the custodian certified that Saoule Moukhametova was the victim in the Complainant’s criminal case. Here, the Complainant stated in his complaint that the requested records pertained to his criminal matter. As the Complainant is seeking the medical

information of his victim, which is prohibited under N.J.S.A. 47:1A-2.2(a), unless requested via court motion. N.J.S.A. 47:1A-2.2(b).

Therefore, the Custodian lawfully denied access to Item no. 1 of the Complainant's OPRA request seeking audio recordings taken during the autopsy performed upon Saoule Moukhametova. N.J.S.A. 47:1A-6. The evidence in the record demonstrates that the Complainant was convicted of an indictable offense, that his victim was Saoule Moukhametova, and he is thus prohibited from obtaining records containing her personal information, including medical history under OPRA. N.J.S.A. 47:1A-2.2(a). See Boretsky, GRC 2016-219. Accordingly, the Council declines to address whether the records are exempt under N.J.S.A. 47:1A-1.1.

#### Item Nos. 2 & 7

OPRA defines a criminal investigatory record as "a record which is not required by law to be made, maintained, or kept on file that is held by a law enforcement agency which pertains to any criminal investigation or related civil enforcement proceeding." N.J.S.A. 47:1A-1.1. Therefore, for a record to be considered exempt from disclosure under OPRA as a criminal investigatory record pursuant to N.J.S.A. 47:1A-1.1, that record must meet both prongs of a two-prong test. See O'Shea v. Twp. of West Milford, 410 N.J. Super. 371 (App. Div. 2009).

The New Jersey Supreme Court considered this two-prong test in North Jersey Media Grp., Inc. v. Twp. of Lyndhurst, 229 N.J. 541 (2017). The Court affirmed that OPRA's criminal investigatory records exemption applies to police records which originate from a criminal investigation. Id. at 551. However, the Court held that "to qualify for the exception — and be exempt from disclosure — a record (1) must not be 'required by law to be made,' and (2) must 'pertain[ ] to a criminal investigation.'" N.J.S.A. 47:1A-1.1." Id. at 564.

The Court made it clear that if the first prong cannot be met because such a record is required by law to be made, then that record "cannot be exempt from disclosure under OPRA's criminal investigatory records exemption. N.J.S.A. 47:1A-1.1." Id. at 565. Although the Court agreed with the Appellate Division's finding that a clear statement of policy to police officers from the State Attorney General has "the force of law for police entities," it declined to hold that records retention schedules adopted by the State Records Committee meet OPRA's "required by law" standard. Id. at 567-68.

The Court also noted that even if a record is not required by law to be made, it must still pertain to a criminal investigation. Id. at 569. The Court reiterated the Appellate Division's observation that "some police records relate to an officer's community-caretaking function; others to the investigation of a crime." Id. (quoting North Jersey Media Grp., 441 N.J. Super. at 105).<sup>6</sup> Therefore, the Court reasoned that determining whether such records pertain to a criminal investigation requires a "case-by-case analysis." Id. However, the Court pointed out that police records that stem from "an investigation into *actual or potential* violations of criminal law," such as "detailed investigative reports and witness statements," will satisfy the second prong of OPRA's

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<sup>6</sup>This is instructive for police agencies because it underscores the fact that their role in society is multi-faceted; hence, not all of their duties are focused upon investigation of criminal activity. And only those records created in their capacity as criminal investigators are subject to OPRA's criminal investigatory records exemption.

criminal investigatory records exemption. North Jersey Media Grp., 229 N.J. at 569 (emphasis added).

Additionally, the Council has long held that once a record is determined to be a criminal investigatory record, it is exempt from access. See Janeczko v. N.J. Dep't of Law and Pub. Safety, Div. of Criminal Justice, GRC Complaint Nos. 2002-79 and 2002-80 (June 2004), holding that “criminal investigatory records include records involving all manner of crimes, resolved or unresolved, and includes information that is part and parcel of an investigation, confirmed and unconfirmed.”<sup>7</sup> Moreover, with respect to concluded investigations, the Council found that, “[the criminal investigatory records exemption] does not permit access to investigatory records once the investigation is complete.” Janeczko, GRC 2002-79, *et seq.*

In the instant matter, the Complainant sought any notes taken by medical examiners and law enforcement personnel regarding a criminal investigation, identified by the Complainant as “State v. Boris Boretsky, Case (ID No. 12050316).” Additionally, the Complainant sought a letter from the victim to the Complainant in relation to the criminal matter. In conjunction with the Custodian’s certification, any responsive records to Item nos. 2 & 7 would satisfy the second prong of the North Jersey Media Grp., in that they would pertain to a criminal investigation. 229 N.J. at 569. Additionally, there is no evidence in the record demonstrating that “notes” taken by the identified personnel or correspondence between the victim and defendant in relation to a criminal investigation are required to by law to be made, thereby satisfying the first prong of the test. Id. at 566.

Therefore, the Custodian lawfully denied access to Item nos. 2 & 7 of the Complainant’s OPRA request. N.J.S.A. 47:1A-6. Specifically, notes taken by medical examiners and law enforcement personnel, as well as correspondence between the victim and the Complainant, which pertain to the Complainant’s criminal case are exempt from disclosure as criminal investigatory records under N.J.S.A. 47:1A-1.1. North Jersey Media Grp., 229 N.J. at 564; O’Shea, 410 N.J. Super. at 371; and Janeczko, GRC 2002-79, *et seq.*

#### Item Nos. 3 & 4

OPRA provides that photographs, negatives, prints, and video recordings of a deceased body taken by or for a medical examiner in the course of an autopsy are not government records under N.J.S.A. 47:1A-1.1. This provision is subject to specific exceptions:

- When used in a criminal action or proceeding in this State which relates to the death of that person,
- For the use as a court of this State permits, by order after good cause has been shown and after written notification of the request for the court order has been served at least five days before the order is made upon the county prosecutor for the county in which the post mortem examination or autopsy occurred,
- For use in the field of forensic pathology or for use in medical or scientific education or research, or

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<sup>7</sup> The GRC’s ruling was affirmed in an unpublished opinion of the Appellate Division.



- For use by any law enforcement agency in this State or any other state or federal law enforcement agency[.]

[Id.]

In the instant matter, the Complainant's request Item nos. 3 & 4 sought all autopsy photographs in color and an x-ray of the victim's chest. By the Complainant's own admission, he is an incarcerated individual housed at New Jersey State Prison as a result of his conviction of an indictable offense. Additionally the Complainant's OPRA request does not fall under any of the stated exceptions listed above, as he seeks the photographs in furtherance of an appellate proceeding.

Therefore, although the Custodian denied access to Item nos. 3 & 4 on different grounds, the records were lawfully denied, as autopsy photographs and prints are not government records pursuant to N.J.S.A. 47:1A-1.1, and the circumstances of the request do not fall under the listed exceptions. N.J.S.A. 47:1A-6. Accordingly, the Council declines to address whether the records would be denied under N.J.S.A. 47:1A-2.2(a).

#### Item No. 6

OPRA states that "[t]he provisions of this act . . . shall not abrogate any exemption of a public record or government record from public access . . . made pursuant to Executive Order of the Governor." N.J.S.A. 47:1A-9(a). In turn, Executive Order No. 69 (Gov. Whitman, 1997) ("EO 69") states in part:

[t]he following records shall not be deemed to be public records subject to inspection and examination and available for copying pursuant to the provisions of [OPRA], as amended: fingerprint cards, plates and *photographs* and similar criminal investigation records that are required to be made, maintained or kept by any State or local government agency. (Emphasis added).

In Barkley v. Essex Cnty. Prosecutor's Office, GRC Complaint No. 2011-221 (February 2013), the complainant sought "crime scene photographs in [State v. Barkley,] Ind. No. 1390-4-93." The Council upheld the custodian's denial of access, finding that EO 69 explicitly prohibits disclosure of these records, and N.J.S.A. 47:1A-9(a) mandates that OPRA's provisions are superseded by exemptions promulgated via executive order.

The facts in the instant matter parallels those in Barkley, GRC 2011-221. The Complainant sought photographs of an identified residence in Monmouth Junction, New Jersey. The Custodian asserted that the residence is the location of a crime scene, however it is not confirmed based upon the record. Nonetheless, the Complainant admitted that the requested photographs were taken in connection to his criminal case under Ind. No. 02-05-0642-I, as stated in his cover letter to the Custodian and in his complaint with the GRC. Therefore, the requested photographs are explicitly precluded from disclosure under EO 69.

Thus, although the Custodian denied access to Item no. 6 on other grounds, the requested records were lawfully denied. N.J.S.A. 47:1A-6. Specifically, the requested photographs are explicitly exempt from disclosure under OPRA pursuant to N.J.S.A. 47:1A-9(a) and EO 69. See Barkley, GRC 2011-221.

### **Conclusions and Recommendations**

The Council Staff respectfully recommends the Council find that:

1. The Custodian lawfully denied access to Item no. 1 of the Complainant's OPRA request seeking audio recordings taken during the autopsy performed upon Saoule Moukhametova. N.J.S.A. 47:1A-6. The evidence in the record demonstrates that the Complainant was convicted of an indictable offense, that his victim was Saoule Moukhametova, and is thus prohibited from obtaining records containing her personal information, including medical history under OPRA. N.J.S.A. 47:1A-2.2(a). See Boretsky v. Middlesex Cnty. Medical Examiner's Office, GRC Complaint No. 2016-219 (January 2018). Accordingly, the Council declines to address whether the records are exempt under N.J.S.A. 47:1A-1.1.
2. The Custodian lawfully denied access to Item nos. 2 & 7 of the Complainant's OPRA request. N.J.S.A. 47:1A-6. Specifically, notes taken by medical examiners and law enforcement personnel, as well as correspondence between the victim and the Complainant, which pertain to the Complainant's criminal case are exempt from disclosure as criminal investigatory records under N.J.S.A. 47:1A-1.1. North Jersey Media Grp., Inc. v. Twp. of Lyndhurst, 229 N.J. 541 (2017); O'Shea v. Twp. of West Milford, 410 N.J. Super. 371 (App. Div. 2009); and Janeczko v. N.J. Dep't of Law and Pub. Safety, Div. of Criminal Justice, GRC Complaint Nos. 2002-79 and 2002-80 (June 2004)
3. Although the Custodian denied access to Item nos. 3 & 4 on different grounds, the records were lawfully denied, as autopsy photographs and prints are not government records pursuant to N.J.S.A. 47:1A-1.1, and the circumstances of the request do not fall under the listed exceptions. N.J.S.A. 47:1A-6. Accordingly, the Council declines to address whether the records would be denied under N.J.S.A. 47:1A-2.2(a).
4. Although the Custodian denied access to Item no. 6 on other grounds, the requested records were lawfully denied. N.J.S.A. 47:1A-6. Specifically, the requested photographs are explicitly exempt from disclosure under OPRA pursuant to N.J.S.A. 47:1A-9(a) and Executive Order No. 69 (Gov. Whitman, 1997). See Barkley v. Essex Cnty. Prosecutor's Office, GRC Complaint No. 2011-221 (February 2013).

Prepared By: Samuel A. Rosado  
Staff Attorney

March 20, 2018