



State of New Jersey
GOVERNMENT RECORDS COUNCIL
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CHRIS CHRISTIE
Governor

KIM GUADAGNO
Lt. Governor

LORI GRIFA
Commissioner

FINAL DECISION

March 29, 2011 Government Records Council Meeting

Brian Keith Bragg
Complainant

Complaint No. 2010-145

v.

New Jersey Department of Corrections
Custodian of Record

At the March 29, 2011 public meeting, the Government Records Council (“Council”) considered the March 22, 2011 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. Because the Complainant failed to have sufficient funds in his account to pay for the records responsive to request Item No. 1, the complete institutional file, Ms. Tymkow did not unlawfully deny access to the records responsive to request Item No. 1 pursuant to N.J.S.A. 47:1A-5.b., Santos v. NJ State Parole Board, GRC Complaint No. 2004-74 (August 2004), and Paff v. City of Plainfield, GRC Complaint No. 2006-54 (July 2006).
2. Because at the time of the Complainant’s filing of his OPRA request and the Custodian’s response to the Complainant’s OPRA request the New Jersey Department of Correction’s proposed but not adopted regulation N.J.A.C. 10A:22-3.2(a)(6) was in effect,¹ it was reasonable for the Custodian to rely upon such regulation to deny access to the requested records based on the state of the law at that time. The Custodian lawfully denied access to records requested for Items No. 2 through No. 5 pursuant to N.J.S.A. 47:1A-9.a. and Executive Orders 21 and 26.
3. Furthermore, the Complainant’s OPRA request for Item No. 1, the complete institutional file and Item No. 2, the complete Special Investigation Division file fails to identify specific government records sought. The Complainant’s request does not state with reasonable clarity which records he is seeking from those files. Moreover, the Complainant’s request seeks entire files rather than specific identifiable government records. See MAG Entertainment, LLC v. Division of Alcoholic Beverage Control, 375 N.J.Super. 534 (App. Div. 2005), Bent v. Stafford Police

¹ The Appellate Division decided the matter of Slaughter v. Government Records Council 413 N.J. Super. 544 (App. Div. 2010) on June 4, 2010; therefore the Complainant’s OPRA request predates the Appellate Division’s decision. The Custodian responded to the Complainant’s OPRA request on June 1, 2010.



Department, 381 N.J.Super. 30 (App. Div. 2005), New Jersey Builders Association v. New Jersey Council of Affordable Housing, 390 N.J. Super. 166 (App. Div. 2007) and Schuler v. Borough of Bloomsbury, GRC Complaint No. 2007-151 (February 2009).

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 29th Day of March, 2011

Robin Berg Tabakin, Chair
Government Records Council

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

Charles A. Richman, Secretary
Government Records Council

Decision Distribution Date: April 1, 2011

**STATE OF NEW JERSEY
GOVERNMENT RECORDS COUNCIL**

**Findings and Recommendations of the Executive Director
March 29, 2011 Council Meeting**

Brian Keith Bragg¹
Complainant

GRC Complaint No. 2010-145

v.

New Jersey Department of Corrections²
Custodian of Records

Records Relevant to Complaint: Copies of:

1. Complete Institutional File
2. Complete Special Investigation Division File

Request Made: May 20, 2010

Response Made: June 1, 2010

Custodian: Deirdre Fedkenheuer

GRC Complaint Filed: July 7, 2010³

Background

May 20, 2010

Complainant's Open Public Records Act ("OPRA") request. The Complainant requests the records relevant to this complaint listed above on an official OPRA request form.

June 1, 2010

Custodian's response to the OPRA request. The Custodian states that she received the Complainant's OPRA request on June 1, 2010. The Custodian responds in writing to the Complainant's OPRA request on the same business day as receipt of such request. The Custodian states that the OPRA Liaison at New Jersey State Prison will advise the Complainant within seven (7) business days of the appropriate fees associated with any releasable records in response to request Item No. 1.

The Custodian states that access to records responsive to request Item No. 2 is denied pursuant to Executive Order 26 (McGreevey 2002), which exempts from disclosure under OPRA "any report or record relating to an identified individual, which if disclosed, would jeopardize the safety or any person or the safe and secure operation of the correctional facility." The Custodian also states that the Department of Corrections ("DOC") cannot provide the Complainant records gathered by the Special Investigations

¹ No legal representation listed on record.

² Represented by DAG Ellen M. Hale, on behalf of the NJ Attorney General.

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

Division with respect to their investigation because doing so might compromise investigative techniques utilized by the Department and/or ongoing investigations.

June 9, 2010

Letter from OPRA Liaison, Donna Tymkow (“Ms. Tymkow”) to the Complainant. Ms. Tymkow responds to the Complainant’s OPRA request in writing within six (6) business days of the Custodian’s receipt of such request. Ms. Tymkow forwards the Complainant a Records Request Payment Notification and Authorization Form indicating that there are 106 pages responsive to request Item No. 1. Ms. Tymkow also indicates that the cost for copies of these pages will be \$34.00.

July 7, 2010

Denial of Access Complaint filed with the Government Records Council (“GRC”) with no attachments.

The Complainant states that he made an OPRA request to the Department of Corrections. The Complainant also states that he was not provided with any records responsive to request Item No. 1. Furthermore, the Complainant states that he was denied access to the records responsive to request Item No. 2.

July 12, 2010

Letter from the Complainant to Southwoods State Prison. The Complainant signs the OPRA Records Request Payment Notification and Authorization form authorizing the Business Office to deduct \$34.00 from his account to prepay the costs associated with the records responsive.

July 16, 2010

Letter from Ms. Tymkow to the Complainant. Ms. Tymkow states that access to records responsive to the Complainant’s request Item No. 1, complete institutional file, is denied because the Complainant does not have sufficient funds to pay for these records.

July 20, 2010

Offer of Mediation sent to both parties.

August 4, 2010

The Custodian declines mediation.

August 4, 2010

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

August 5, 2010

Custodian’s SOI with the following attachments:

- Complainant’s OPRA request dated June 1, 2010
- Letter from the Custodian to the Complainant dated June 1, 2010
- Letter from Ms. Tymkow dated July 16, 2010 with attachments

The Custodian certifies that she received the Complainant's OPRA request on June 1, 2010 seeking his complete institutional file and the complete Special Investigation file. The Custodian certifies she responded on the same business day as receipt of the OPRA request. The Custodian also certifies that in response to Item No. 1, the complete institutional file, she informed the Complainant that he would be advised within seven (7) business days of the copying costs. The Custodian further certifies that access to records responsive to request Item No. 2 is denied pursuant to Executive Order 26 (McGreevey).

The Custodian certifies that Ms. Tymkow forwarded the Records Request Payment Notification and Authorization Form indicating that the copying cost associated with the records responsive to Item No. 1 will be \$34.00 for 106 pages to the Complainant on June 9, 2010. The Custodian also certifies that the Complainant signed the Payment Authorization Form and submitted it to Southwoods State Prison as directed on July 12, 2010. The Custodian further certifies that Ms. Tymkow denied access to the records responsive to the Complainant's OPRA request for Item No. 1 due to insufficient funds in the Complainant's account.

The Custodian also argues that the Complainant's denial of access to records responsive to request Item No. 2, the complete Special Investigation Division File, should be upheld because request Item No. 2 is vague and ambiguous pursuant to MAG Entertainment, LLC v. Division of Alcoholic Beverage Control, 375 N.J.Super. 534 (App. Div. 2005), because the Complainant does not identify the specific Special Investigation Division file sought.

Furthermore, the Custodian argues that access to the records responsive to request Item No. 2 was properly denied. The Custodian argues that disclosure of records gathered by the Special Investigations Division is prohibited because disclosure might compromise investigative techniques utilized by the Department and/or ongoing investigations pursuant to N.J.S.A. 47:1A-1.1, which states "a government record shall not include confidential information." Additionally, the Custodian certifies that the Department of Corrections' regulations state:

"records designated as confidential pursuant to the provisions of N.J.S.A. 47:1A-1...any other...Executive Order of the Governor...the following records shall not be considered government records subject to public access pursuant to N.J.S.A. 47:1A-1 as amended and including the following:

6. A report or record relating to an identified individual which, if disclosed, would jeopardize the safety of any person or the safe and secure operation of the correctional facility or other designated place of confinement." *N.J.A.C. 10A:22-3.2(a)(6)*, July 1, 2002 (proposed but not adopted).

The Custodian certifies that the DOC's proposed regulations are viable and a custodian may rely on such proposed regulations. *See Catrell v. New Jersey Department of Corrections*, GRC Complaint No. 2006-121 (February 2007). However, the Custodian

also certifies that an Appellate Division decision in Slaughter v. NJ Department of Corrections 413 N.J. Super. 544 (App. Div. 2010) determined that these proposed regulations were only temporary. Furthermore, the Custodian certifies that the court held that if agencies wish to rely on these exemptions, they have until November 5, 2010 to promulgate the appropriate regulations.

Analysis

Whether the Custodian unlawfully denied access to the requested records?

OPRA provides that:

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

Additionally, OPRA defines a government record as:

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

OPRA also provides:

“A copy or copies of a government record may be purchased by any person upon payment of the fee prescribed by law or regulation, or if a fee is not prescribed by law or regulation, upon payment of the actual cost of duplicating the record.” N.J.S.A. 47:1A-5.b.

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

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

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.

Lastly, OPRA provides:

“[t]he provisions of this act...shall not abrogate any exemption of public record from public access...made pursuant to any regulation...[or] Executive Order of the Governor.” N.J.S.A. 47:1A-9.a.

The evidence of record indicates that the Complainant filed an OPRA request seeking copies of 1) his complete institutional file and 2) the complete Special Investigation Division file. The evidence of record further indicates that the Custodian responded on the same business day as receipt of the OPRA request stating that the OPRA Liaison at New Jersey State Prison will advise the Complainant within seven (7) business days of the appropriate fees incurred for any releasable records in response to request Item No. 1. In addition, the evidence of record indicates that the Custodian denied access to request Item No. 2 pursuant to Executive Order 26 (McGreevey 2002), which exempts from disclosure under OPRA “any report or record relating to an identified individual, which if disclosed, would jeopardize the safety or any person or the safe and secure operation of the correctional facility.” Further, the evidence of record indicates that the OPRA Liaison, Ms. Tymkow, responded to the Complainant’s OPRA request in writing on June 9, 2010, within six (6) business days of the Custodian’s receipt of the Complainant’s OPRA request, forwarding the Complainant a Records Request Payment Notification and Authorization Form indicating that there are 106 pages responsive to request Item No. 1 and that the cost for copies of these pages will be \$34.00.

Whether Ms. Tymkow unlawfully denied access to Item No. 1, the complete institutional file, because the Complainant did not have sufficient funds to pay for the responsive records?

OPRA provides:

“A copy or copies of a government record may be purchased by any person upon payment of the fee prescribed by law or regulation, or if a fee is not prescribed by law or regulation, upon payment of the actual cost of duplicating the record.” N.J.S.A. 47:1A-5.b.

The GRC held in Santos v. NJ State Parole Board, GRC Complaint No. 2004-74 (August 2004) that since the Custodian did not receive payment for the records responsive, the Custodian properly withheld the requested copies of the records until payment was received. Furthermore, in Paff v. City of Plainfield, GRC Complaint No. 2006-54 (July 2006), the Custodian responded to the Complainant’s OPRA request stating that the requested record would be made available upon payment of copying costs. In Paff, supra, the GRC upheld its decision in Santos, supra, stating that the Custodian did not unlawfully deny access to the requested records because the Custodian is not required to release records until payment is received.

The facts in Santos, supra, and Paff, supra, are similar to the facts in the instant complaint. Ms. Tymkow informed the Complainant in writing within seven (7) business days of the Custodian’s receipt of the OPRA request that the copying cost associated with the records responsive to Item No. 1 would be \$34.00 for 106 pages. The Complainant signed the authorization form on July 12, 2010 and submitted it to his institution.

Because the Complainant's institutional account was found to lack sufficient funds to pay for the requested copies of records, Ms. Tymkow wrote to the Complainant on July 16, 2010 informing him that she was denying his OPRA request due to insufficient funds to pay for the OPRA copying fees.

Therefore, because the Complainant failed to have sufficient funds in his account to pay for the records responsive to request Item No. 1, the complete institutional file, Ms. Tymkow did not unlawfully deny access to the records responsive to request Item No. 1 pursuant to N.J.S.A. 47:1A-5.b., Santos v. NJ State Parole Board, GRC Complaint No. 2004-74 (August 2004), and Paff v. City of Plainfield, GRC Complaint No. 2006-54 (July 2006).

The GRC next addresses the issue of whether the Custodian lawfully denied access to request Item No. 2, the Special Investigation Division file.

In the matter before the Council, the Complainant's OPRA request dated May 20, 2010 for Item No. 2 sought the complete Special Investigation Division file. On June 1, 2010, the Custodian denied access to the records responsive to Item No. 2 pursuant to Executive Order 26 (McGreevey 2002), which exempts from disclosure under OPRA "any report or record relating to an identified individual, which if disclosed, would jeopardize the safety of any person or the safe and secure operation of the correctional facility."

OPRA provides "[t]he provisions of this act...shall not abrogate any exemption of public record from public access...made pursuant to any regulation...[or] Executive Order of the Governor." N.J.S.A. 47:1A-9.a.

Additionally, Paragraph 4 of Executive Order No. 21 provides in relevant part as follows:

"[i]n light of the fact that State departments and agencies have proposed rules exempting certain government records from public disclosure, and these regulations have been published for public comment, but cannot be adopted prior to the effective date of the Open Public Records Act, State agencies are hereby directed to handle all government records requests in a manner consistent with the rules as they have been proposed and published, and the records exempted from disclosure by those proposed rules are exempt from disclosure by this Order..."

Paragraph 6 of Executive Order No. 26 provides that:

"[t]he remaining provisions of Executive Order No. 21 are hereby continued to the extent that they are not inconsistent with this Executive Order."

The Custodian argued in the SOI that the Department's regulations stated in pertinent part that:

“A report or record relating to an identified individual which, if disclosed, would jeopardize the safety of any person or the safe and secure operation of the correctional facility or other designated place of confinement.” *N.J.A.C.* 10A:22-3.2(a)(6), July 1, 2002 (proposed but not adopted).

In the instant complaint, the Custodian certified that the records responsive to Complainant’s request Item No. 2, if disclosed, would “jeopardize the safety of any person or the safe and secure operation of the correctional facility or other designated place of confinement.” *N.J.A.C.* 10A:22-3.2(a)(6), July 1, 2002 (proposed but not adopted), *N.J.S.A.* 47:1A-9.a. and Executive Order 21 and 26 (McGreevey 2002). Furthermore, the Custodian argued that the Appellate Division’s decision in Slaughter v. NJ Government Records Council 413 *N.J. Super.* 544 (App. Div. 2010) stated that these proposed regulations were only temporary, but if these agencies wish to rely on these exemptions they have until November 5, 2010 to promulgate these regulations.

At the time of the Complainant’s May 20, 2010 OPRA request and the Custodian’s June 1, 2010 response, although these Executive Orders were issued over six (6) years ago, no rescinding or modifying order had been issued. *See Newark Morning Ledger Co., Publisher of the Star Ledger v. Division of the State Police of the New Jersey Department of Law and Public Safety*, Law Division – Mercer County, Docket No. MER-L-1090 05 (July 5, 2005). The Appellate Division decided Slaughter, *supra*, on June 4, 2010, three (3) days after the Custodian’s response to the Complainant’s OPRA request dated May 20, 2010. These proposed regulations were also in full force and effect pursuant to an extension granted by the Appellate Division in Slaughter v. NJ Government Records Council 413 *N.J. Super.* 544 (App. Div. 2010).

Therefore, because at the time of the Complainant’s filing of his OPRA request dated May 20, 2010 and the Custodian’s response dated June 1, 2010, the NJDOC’s proposed but not adopted regulation *N.J.A.C.* 10A:22-3.2(a)(6) was in effect,⁴ it was reasonable for the Custodian to rely upon such regulation to deny access to the requested records based on the state of the law at that time. The Custodian lawfully denied access to records requested for Items No. 2 pursuant to *N.J.S.A.* 47:1A-9.a. and Executive Orders 21 and 26.

Lastly, the GRC addresses the issue of whether the Complainant’s request for Items No. 1 and No. 2 are valid under OPRA.

The Complainant’s request for Items No. 1, complete institutional file and No. 2, complete Special Investigation Division file is overly broad, fails to identify specific government records, and is therefore invalid under OPRA. The New Jersey Superior Court has held that “[w]hile OPRA provides an alternative means of access to government documents not otherwise exempted from its reach, *it is not intended as a research tool litigants may use to force government officials to identify and siphon useful information. Rather, OPRA simply operates to make identifiable government records*

⁴ The Appellate Division decided the matter of Slaughter v. Government Records Council 413 *N.J. Super.* 544 (App. Div. 2010) on June 4, 2010; therefore the Complainant’s OPRA request predates the Appellate Division’s decision. The Custodian responded to the Complainant’s OPRA request on June 1, 2010. Brian Keith Bragg v. New Jersey Department of Corrections, 2010-145 – Findings and Recommendations of the Executive Director

'readily accessible for inspection, copying, or examination.' *N.J.S.A. 47:1A-1.*" (Emphasis added.) MAG Entertainment, LLC v. Division of Alcoholic Beverage Control, 375 *N.J. Super.* 534, 546 (App. Div. 2005). The Court further held that "[u]nder OPRA, agencies are required to disclose only 'identifiable' government records not otherwise exempt ... In short, OPRA does not countenance open-ended searches of an agency's files." (Emphasis added.) *Id.* at 549.

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

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

Further, in Bent v. Stafford Police Department, 381 *N.J. Super.* 30, 37 (App. Div. 2005),⁵ the Superior Court references MAG in that the Court held that a requestor must specifically describe the document sought because OPRA operates to make identifiable government records "accessible." "As such, a proper request under OPRA must identify with reasonable clarity those documents that are desired, and a party cannot satisfy this requirement by simply requesting all of an agency's documents."⁶

Additionally, in New Jersey Builders Association v. New Jersey Council on Affordable Housing, 390 *N.J. Super.* 166, 180 (App. Div. 2007) the court cited MAG by stating that "...when a request is 'complex' because it fails to specifically identify the documents sought, then that request is not 'encompassed' by OPRA..." The court also quoted *N.J.S.A. 47:1A-5.g* in that "[i]f a request for access to a government record would substantially disrupt agency operations, the custodian may deny access to the record after attempting to reach a reasonable solution with the requestor that accommodates the interests of the requestor and the agency." The court further stated that "...the Legislature would not expect or want courts to require more persuasive proof of the substantiality of a disruption to agency operations than the agency's need to...generate new records..."

Furthermore, in Schuler v. Borough of Bloomsbury, GRC Complaint No. 2007-151 (February 2009) the Council held that "[b]ecause the Complainant's OPRA requests

⁵ Affirmed on appeal regarding Bent v. Stafford Police Department, GRC Case No. 2004-78 (October 2004).

⁶ As stated in Bent, *supra*.

2-5 are not requests for identifiable government records, the requests are invalid and the Custodian has not unlawfully denied access to the requested records pursuant to MAG Entertainment, LLC v. Division of Alcoholic Beverage Control, 375 N.J.Super. 534 (App. Div. 2005) and Bent v. Stafford Police Department, 381 N.J.Super. 30 (App. Div. 2005).”

Furthermore, the Complainant’s OPRA request for Item No. 1, complete institutional file and Item No. 2, complete Special Investigation Division file fails to identify specific government records sought. The Complainant’s request does not state with reasonable clarity which records he is seeking from those files. Moreover, the Complainant’s request seeks entire files rather than specific identifiable government records. See MAG Entertainment, LLC v. Division of Alcoholic Beverage Control, 375 N.J.Super. 534 (App. Div. 2005), Bent v. Stafford Police Department, 381 N.J.Super. 30 (App. Div. 2005), New Jersey Builders Association v. New Jersey Council of Affordable Housing, 390 N.J. Super. 166 (App. Div. 2007) and Schuler v. Borough of Bloomsbury, GRC Complaint No. 2007-151 (February 2009).

Conclusions and Recommendations

The Executive Director respectfully recommends the Council find that:

1. Because the Complainant failed to have sufficient funds in his account to pay for the records responsive to request Item No. 1, the complete institutional file, Ms. Tymkow did not unlawfully deny access to the records responsive to request Item No. 1 pursuant to N.J.S.A. 47:1A-5.b., Santos v. NJ State Parole Board, GRC Complaint No. 2004-74 (August 2004), and Paff v. City of Plainfield, GRC Complaint No. 2006-54 (July 2006).
2. Because at the time of the Complainant’s filing of his OPRA request and the Custodian’s response to the Complainant’s OPRA request the New Jersey Department of Correction’s proposed but not adopted regulation *N.J.A.C. 10A:22-3.2(a)(6)* was in effect,⁷ it was reasonable for the Custodian to rely upon such regulation to deny access to the requested records based on the state of the law at that time. The Custodian lawfully denied access to records requested for Items No. 2 through No. 5 pursuant to N.J.S.A. 47:1A-9.a. and Executive Orders 21 and 26.
3. Furthermore, the Complainant’s OPRA request for Item No. 1, the complete institutional file and Item No. 2, the complete Special Investigation Division file fails to identify specific government records sought. The Complainant’s request does not state with reasonable clarity which records he is seeking from those files. Moreover, the Complainant’s request seeks entire files rather than specific identifiable government records. See MAG Entertainment, LLC v.

⁷ The Appellate Division decided the matter of Slaughter v. Government Records Council 413 N.J. Super. 544 (App. Div. 2010) on June 4, 2010; therefore the Complainant’s OPRA request predates the Appellate Division’s decision. The Custodian responded to the Complainant’s OPRA request on June 1, 2010. Brian Keith Bragg v. New Jersey Department of Corrections, 2010-145 – Findings and Recommendations of the Executive Director

Division of Alcoholic Beverage Control, 375 N.J.Super. 534 (App. Div. 2005), Bent v. Stafford Police Department, 381 N.J.Super. 30 (App. Div. 2005), New Jersey Builders Association v. New Jersey Council of Affordable Housing, 390 N.J. Super. 166 (App. Div. 2007) and Schuler v. Borough of Bloomsbury, GRC Complaint No. 2007-151 (February 2009).

Prepared By: Harlynn A. Lack, Esq.
Case Manager

Approved By: Catherine Starghill, Esq.
Executive Director

March 22, 2011