



State of New Jersey
DEPARTMENT OF COMMUNITY AFFAIRS
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Governor

LT. GOVERNOR SHEILA Y. OLIVER
Commissioner

FINAL DECISION

July 31, 2018 Government Records Council Meeting

Russell Carollo
Complainant

Complaint No. 2015-325

v.

Rutgers, The State University of NJ
Custodian of Record

At the July 31, 2018 public meeting, the Government Records Council (“Council”) considered the July 24, 2018 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 original Custodian’s September 25, 2015 response was insufficient because she failed to respond in writing to each request item contained in the request individually. Therefore, the original Custodian has violated OPRA pursuant to N.J.S.A. 47:1A-5(g) and Paff v. Willingboro Bd. of Educ. (Burlington), GRC Complaint No. 2007-272 (May 2008).
2. The portion of the Complainant’s request seeking “records,” and “funding” is invalid. OPRA does not require the Custodian to perform the research necessary to locate responsive records. [MAG Entm’t, LLC v. Div. of Alcoholic Beverage Control, 375 N.J. Super. 534, 546 (App. Div. 2005); Bent v. Twp. of Stafford Police Dep’t, 381 N.J. Super. 30, 37 (App. Div. 2005); N.J. Builders Assoc. v. N.J. Council on Affordable Hous., 390 N.J. Super. 166, 180 (App. Div. 2007); Schuler v. Borough of Bloomsbury, GRC Complaint No. 2007-151 (February 2009); Feiler-Jampel v. Somerset Cnty. Prosecutor’s Office, GRC Complaint No. 2007-190 (Interim Order dated March 26, 2008). Further, the portion of the Complainant’s request seeking “communication” is invalid because they did not include all of the criteria required under Elcavage v. West Milford Twp. (Passaic), GRC Complaint No. 2009-07 (April 2010). See Armenti v. Robbinsville Bd. of Educ. (Mercer), GRC Complaint No. 2009-154 (Interim Order May 24, 2011). Thus, the original Custodian did not unlawfully deny access to the request seeking the aforementioned records. N.J.S.A. 47:1A-6.
3. The Custodian has borne his burden of proof that he lawfully denied access to portion of the Complainant’s OPRA request seeking third party OPRA requests pertaining to the same records because he certified in the SOI, and the record reflects, that no responsive records exist. N.J.S.A. 47:1A-6; see Pusterhofer v. N.J. Dep’t of Educ., GRC Complaint No. 2005-49 (July 2005).



4. The original Custodian provided an insufficient response in violation of N.J.S.A. 47:1A-5(g), the evidence in the record demonstrates that she did not unlawfully deny access to the records since the portion of the OPRA request seeking “funding”, “records, and “communication” was invalid. Further, the Custodian did not unlawfully deny access to the portion of the request seeking third-party OPRA requests since he certified that no responsive records exist. Additionally, the evidence of record does not indicate that the original Custodian’s violation of OPRA had a positive element of conscious wrongdoing or was intentional and deliberate. Therefore, the original 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.

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 July, 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: August 3, 2018

**STATE OF NEW JERSEY
GOVERNMENT RECORDS COUNCIL**

**Findings and Recommendations of the Council Staff
July 31, 2018 Council Meeting**

**Russell Carollo¹
Complainant**

GRC Complaint No. 2015-325

v.

**Rutgers, The State University of New Jersey²
Custodial Agency**

Records Relevant to Complaint: “I request access to and copies of all records related in any way to funding provided by Google, Inc., since Jan. 1, 2005.

This request includes, but is not limited to, any funding related in any way to Michael A. Carrier [Mr. Carrier], and all communication between Google and [Mr. Carrier].

In addition, this request includes, but is not limited to, records of communication and/or funding involving all work related in any way to a paper by [Mr. Carrier] published on or about Oct. 24, 2012, entitled ‘Copyright and Innovation: The Untold Story Intellectual Property,’ and a paper by [Mr. Carrier] published on or about Sept. 5, 2013, entitled “Only Scraping the Surface: The Copyright Hold in the FTC’s Google Settlement.’

This request includes, but is not limited to, other public records requests seeking any of the information being sought in this request, response letters and responsive documents provided to requesters.”

Custodian of Record: Daniel E. Faltas, Esq.³
Request Received by Custodian: September 25, 2015
Response Made by Custodian: October 14, 2015
GRC Complaint Received: October 20, 2015

Background⁴

Request and Response:

On September 18, 2015, the Complainant submitted an Open Public Records Act

¹ No representation listed on record.

² Represented by Elizabeth Minott, Esq., of Rutgers University (New Brunswick, NJ).

³ The Records Custodian at the time of the request was Elizabeth v. Gilligan, Esq. The current Records Custodian is Casey Woods.

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 Council Staff the submissions necessary and relevant for the adjudication of this complaint.

("OPRA") request to the original Custodian seeking the above-mentioned records. On October 14, 2015, the eleventh (11th) business day after receipt, the original Custodian responded in writing, answering the request in four (4) parts. However, all four (4) parts were denied on the basis that they were all overbroad and fail to seek specific, identifiable documents.

Denial of Access Complaint:

On October 20, 2015, the Complainant filed a Denial of Access Complaint with the Government Records Council ("GRC"). The Complainant asserted that the Custodian failed to address the first sentence in request; that he sought all records related to funding provided by Google since January 1, 2005. The Complainant argued that the Custodian ignored this portion from the remainder of his request. Additionally, the Complainant argued that sources of income are a fundamental record that any government agency, including Rutgers University, should have on hand.

Regarding access to "any funding related in any way to Michael A. Carrier, and all communication between Google and [Mr. Carrier]," the Complainant reasserted the arguments above, as well as noting that Rutgers University ought to have records related to monitoring any outside employment of its employees.

On access to records pertaining to papers published by Mr. Carrier, the Complainant argued that he specifically identified the papers in question, its author, and the dates of publication for each. Therefore, the Complainant disputed the assertion that this portion of the request was too vague.

On access to public records requests pertaining to the same information, as well as response letters and any responsive records provided as a result thereof, the Complainant noted the these records would be held, created, and maintained by the Custodian herself.

In all of the above responses, the Complainant noted that the Custodian failed to show that an attempt was made to locate any of the responsive records. The Complainant requested that the GRC find that the Custodian's response was not in keeping with letter and/or spirit of OPRA.

Statement of Information:⁵

On March 3, 2016, the Custodian filed a Statement of Information ("SOI"). Therein Custodian restated the arguments made by the original Custodian regarding this request.

In response to the Complainant's claim that the Custodian failed to address the initial portion of his request, the Custodian admitted that this portion was not addressed in the original response. However, the Custodian asserted that this portion is also vague and overly broad. The Custodian contended that the request would have Rutgers University research all of its schools, departments, and professors to see who may have received funding from Google since 2005, and then compile whatever documents which may exist.

⁵ On November 5, 2015, the complaint was referred to mediation. On February 24, 2016, the complaint was referred back from mediation.

As to the next portion of the request, the Custodian asserted that the requestor failed to explain what is meant by “funding related in any way to Michael A. Carrier,” as this could include funding from any source that Mr. Carrier earns outside of his capacity as a law professor with Rutgers University. Additionally, the Custodian asserted that “funding” is not a specifically identifiable record, stating that “funding” is an abstract term for money. The Custodian contended that the Complainant failed to identify a specific document. Furthermore, the Custodian asserted that “communication” is also not an identifiable record, similar to “funding.”

Regarding the next part of the request, the Custodian restated that it was overly broad and vague due to the Complainant’s usage of “records,” in addition to “funding” and “communication.” The Custodian asserted that the Complainant failed to define the particular type of records that can be located and retrieved.

As to the last portion of the request, the Custodian maintained that because the above portions were themselves overly broad, Rutgers University could not conduct a search for OPRA requests seeking the above information. However, the Custodian certified that a search was conducted between 2012 and the date of the Complainant’s request, and has determined that no prior OPRA requests were made pertaining to Mr. Carrier, his published articles, or to funding coming from Google, Inc. to Rutgers University.

Moreover, the Custodian stated that had the requests been clarified or limited, responsive records would likely include research and/or pedagogical materials that would be exempt under N.J.S.A. 47:1A-1.1. Additionally, the time and expense that would be required to locate, identify, and review responsive records would likely be such an amount as to warrant a special service charge.

Analysis

Insufficient Response

OPRA provides that a custodian’s response, either granting or denying access, must be in writing pursuant to N.J.S.A. 47:1A-5(g). Further, in Paff v. Willingboro Bd. of Educ. (Burlington), GRC Complaint No. 2007-272 (May 2008), the GRC held that “. . . [t]he Custodian’s response was legally insufficient because he failed to respond to each request item individually. Therefore, the Custodian has violated N.J.S.A. 47:1A-5(g).”

Here, the original Custodian responded to the Complainant’s September 18, 2015 OPRA request on October 14, 2015. While the original Custodian addressed a majority of the request, she did not address the initial portion of the request seeking access to records related to funding provided by Google, Inc., since January 1, 2005. It was not until the Complainant mentioned the oversight that the Custodian provided a response within his SOI. While the Complainant did not itemize his request, the initial portion is sufficiently distinct to warrant specific response. Thus, in line with Paff, GRC 2007-272, the original Custodian’s response was insufficient.

Accordingly, the original Custodian’s September 25, 2015 response was insufficient because she failed to respond in writing to each request item contained in the request individually. Therefore, the original Custodian has violated OPRA pursuant to N.J.S.A. 47:1A-5(g) and Paff,

Request Validity

The New Jersey Appellate Division has held that:

While 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 “readily accessible for inspection, copying, or examination.”* N.J.S.A. 47:1A-1.

[MAG Entm’t, LLC v. Div. of Alcoholic Beverage Control, 375 N.J. Super. 534 (App. Div. 2005) (emphasis added).]

The Court reasoned that:

Most 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. at 549 (emphasis added).]

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.” Id. at 549 (emphasis added). See also Bent v. Twp. of Stafford Police Dep’t, 381 N.J. Super. 30, 38 (App. Div. 2005);⁶ N.J. Builders Assoc. v. N.J. Council on Affordable Hous., 390 N.J. Super. 166, 180 (App. Div. 2007); Schuler v. Borough of Bloomsbury, GRC Complaint No. 2007-151 (February 2009).

Regarding generic requests for “records,” the request at issue in MAG sought “all documents or records evidencing that the ABC sought, obtained or ordered revocation of a liquor license for the charge of selling alcoholic beverages to an intoxicated person in which such person, after leaving the licensed premises, was involved in a fatal auto accident” and “all documents or records evidencing that the ABC sought, obtained or ordered suspension of a liquor license exceeding 45 days for charges of lewd or immoral activity.” 375 N.J. Super. at 539-40. The court noted that plaintiffs failed to include additional identifiers such as a case name or docket number. See also Steinhauer-Kula v. Twp. of Downe (Cumberland), GRC Complaint No. 2010-198 (March

⁶ Affirming Bent v. Stafford Police Dep’t, GRC Case No. 2004-78 (October 2004).

2012) (holding that the complainant's request item No. 2 seeking "[p]roof of submission" was invalid); Edwards v. Hous. Auth. of Plainfield (Union), GRC Complaint No. 2008-183 *et seq.* (Final Decision dated April 25, 2012) (accepting the Administrative Law Judge's finding that a newspaper article attached to a subject OPRA request that was related to the records sought did not cure the deficiencies present in the request) Id. at 12-13.

Moreover, in Feiler-Jampel v. Somerset Cnty. Prosecutor's Office, GRC Complaint No. 2007-190 (Interim Order dated March 26, 2008), the Council similarly held that a request seeking "[a]ny and all documents and evidence" relating to an investigation being conducted by the Somerset County Prosecutor's Office was invalid, reasoning that:

[B]ecause the records requested comprise an entire SCPO file, the request is overbroad and of the nature of a blanket request for a class of various documents rather than a request for specific government records. Because OPRA does not require custodians to research files to discern which records may be responsive to a request, the Custodian had no legal duty to research the SCPO files to locate records potentially responsive to the Complainant's request pursuant to the Superior Court's decisions in [MAG], [Bent] and the Council's decisions in [Asarnow, GRC 2006-24] and Morgano v. Essex Cnty. Prosecutor's Office, GRC Complaint No. 2007-190 (February 2008).

[Id. See also Schulz v. NJ State Police, GRC Complaint No. 2014-390 (Interim Order dated July 28, 2015) (holding that the portion of the request seeking "all documents" was overly broad and thus invalid).]

Further, the GRC has established specific criteria deemed necessary under OPRA to request an e-mail communication. See Elcavage v. West Milford Twp. (Passaic), GRC Complaint No. 2009-07 (April 2010). The Council determined that, to be valid, such requests must contain: (1) the content and/or subject of the e-mail, (2) the specific date or range of dates during which the e-mail(s) were transmitted, and (3) the identity of the sender and/or the recipient thereof. See Elcavage, GRC 2009-07; see also Sandoval v. N.J. State Parole Bd., GRC Complaint No. 2006-167 (Interim Order March 28, 2007). The Council later applied the criteria set forth in Elcavage to other forms of correspondence, such as letters. See Armenti v. Robbinsville Bd. of Educ. (Mercer), GRC Complaint No. 2009-154 (Interim Order May 24, 2011).

In the current matter, the request sought in part all "records," including "funding" and "communication" related to Google, Inc., Mr. Carrier, and/or two (2) papers published by Mr. Carrier from 2005 to the time of the request. The Custodian argued that the request sought any type of record containing the identified subject matter, and responding to such would have required an open-ended search of all of the agency's files.

As to the portion of the request for "records" and "funding," case precedent supports finding that these terms insufficiently identify the records sought. Additionally, the GRC agrees with the Custodian that "funding" is too abstract a term to be considered a type of record, as funding can be construed as budgets, checks, or vouchers. Further, "records" would necessarily require the Custodian to search every record within Rutgers University to determine whether it

referred to funding involving Google, Inc. and/or Mr. Carrier, or his papers. MAG, 375 N.J. Super. 534; Steinhauer-Kula, GRC 2010-198.

Regarding the portions of the request seeking “communication,” the Complainant failed to include all required criteria as prescribed in Elcavage, GRC 2009-07 and Armenti, GRC 2009-154. Specifically, one portion of the request only identified ‘communication’ between Google, Inc. and Mr. Carrier but neglected to include a subject matter. The other portion seeking ‘communication’ referenced Mr. Carrier’s papers as a subject matter, but not a sender or recipient.

Accordingly, the portion of the Complainant’s request seeking “records,” and “funding” is invalid. OPRA does not require the Custodian to perform the research necessary to locate responsive records. MAG, 375 N.J. Super. at 546; Bent, 381 N.J. Super. at 37; NJ Builders, 390 N.J. Super. at 180; Schuler, GRC 2007-151; Feiler-Jampel, GRC 2007-190. Further, the portions of the Complainant’s request seeking “communication” is invalid because they did not include all of the criteria required under Elcavage. See Armenti, GRC 2009-154. Thus, the original Custodian did not unlawfully deny access to the request seeking the aforementioned records. N.J.S.A. 47:1A-6.

Unlawful Denial of Access

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

Access to OPRA Requests

In Herbert v. Essex Cnty. Prosecutor’s Office, GRC Complaint No. 2016-51 (March 2018), the custodian responded providing several bases for denial, to include that the request was invalid. However, the custodian also identified several records, which she provided to the Complainant. In analyzing the merits of the complaint, the Council noted that:

[T]he Complainant’s OPRA request items sought certain records from Indictment No. 12-11-2693, *identified categorically by terms used in a retention schedule*. Thus, *this request is invalid on its face because it failed to seek specific, identifiable records*. However, in situations where a request was overly broad on its face but the custodian was able to locate records, the Council has followed Burke v. Brandes, 429 N.J. Super. 169 (App. Div. 2012), in determining that the request contained sufficient information for record identification. See Bond v. Borough of Washington (Warren), GRC Complaint No. 2009-324 (March 2011); Inzelbuch v. Lakewood Bd. of Educ. (Ocean), GRC Complaint No. 2014-92 (September 2014). Here, the Custodian was clearly able to locate the indictment file and responsive records, notwithstanding that the Complainant only provided generic retention terms. Based on this . . . the GRC declines to determine that the OPRA request is invalid.

[Id. at *3 (emphasis added).]

In the instant matter, the original Custodian initially denied access to the portion of the Complainant's request seeking other OPRA requests by stating it was overly broad. However, in SOI the Custodian certified that a search for such records was conducted, and found that no other OPRA requests for records similar to the Complainant's was located. Thus, notwithstanding the original Custodian's claims, the GRC declines to determine that this portion of the OPRA request is invalid, since the Custodian was still capable of conducting a search. The GRC will thus proceed with a determination of whether the Custodian unlawfully denied access to any responsive records.

The Council has previously found that, where a custodian certified that no responsive records exist, no unlawful denial of access occurred. See Pusterhofer v. N.J. Dep't of Educ., GRC Complaint No. 2005-49 (July 2005). Here, notwithstanding the Custodian's claim that the request is invalid, he certified that he conducted search for responsive records from 2012 and through the date of the Complainant's request. The Custodian certified that no responsive records were located and thus do not exist. Additionally, there is no evidence in the record to refute the Custodian's certification.

Accordingly, the Custodian has borne his burden of proof that he lawfully denied access to portion of the Complainant's OPRA request seeking third party OPRA requests pertaining to the same records because he certified in the SOI, and the record reflects, that no responsive records exist. N.J.S.A. 47:1A-6; see Pusterhofer, GRC 2005-49.

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 original Custodian provided an insufficient response in violation of N.J.S.A. 47:1A-5(g), the evidence in the record demonstrates that she did not unlawfully deny access to the records since the portion of the OPRA request seeking “funding”, “records, and “communication” was invalid. Further, the Custodian did not unlawfully deny access to the portion of the request seeking third-party OPRA requests since he certified that no responsive records exist. Additionally, the evidence of record does not indicate that the original Custodian’s violation of OPRA had a positive element of conscious wrongdoing or was intentional and deliberate. Therefore, the original 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.

Conclusions and Recommendations

The Council Staff respectfully recommends the Council find that:

1. The original Custodian’s September 25, 2015 response was insufficient because she failed to respond in writing to each request item contained in the request individually. Therefore, the original Custodian has violated OPRA pursuant to N.J.S.A. 47:1A-5(g) and Paff v. Willingboro Bd. of Educ. (Burlington), GRC Complaint No. 2007-272 (May 2008).
2. The portion of the Complainant’s request seeking “records,” and “funding” is invalid. OPRA does not require the Custodian to perform the research necessary to locate responsive records. [MAG Entm’t, LLC v. Div. of Alcoholic Beverage Control, 375 N.J. Super. 534, 546 (App. Div. 2005); Bent v. Twp. of Stafford Police Dep’t, 381 N.J. Super. 30, 37 (App. Div. 2005); N.J. Builders Assoc. v. N.J. Council on Affordable Hous., 390 N.J. Super. 166, 180 (App. Div. 2007); Schuler v. Borough of Bloomsbury, GRC Complaint No. 2007-151 (February 2009); Feiler-Jampel v. Somerset Cnty. Prosecutor’s Office, GRC Complaint No. 2007-190 (Interim Order dated March 26, 2008). Further, the portion of the Complainant’s request seeking “communication” is invalid because they did not include all of the criteria required under Elcavage v. West Milford Twp. (Passaic), GRC Complaint No. 2009-07 (April 2010). See Armenti v. Robbinsville Bd. of Educ. (Mercer), GRC Complaint No. 2009-154 (Interim Order May 24, 2011). Thus, the original Custodian did not unlawfully deny access to the request seeking the aforementioned records. N.J.S.A. 47:1A-6.
3. The Custodian has borne his burden of proof that he lawfully denied access to portion of the Complainant’s OPRA request seeking third party OPRA requests pertaining to the same records because he certified in the SOI, and the record reflects, that no responsive records exist. N.J.S.A. 47:1A-6; see Pusterhofer v. N.J. Dep’t of Educ., GRC Complaint No. 2005-49 (July 2005).
4. The original Custodian provided an insufficient response in violation of N.J.S.A. 47:1A-5(g), the evidence in the record demonstrates that she did not unlawfully deny access to the records since the portion of the OPRA request seeking “funding”, “records, and “communication” was invalid. Further, the Custodian did not unlawfully deny access to the portion of the request seeking third-party OPRA requests since he certified that no responsive records exist. Additionally, the evidence of record does not

indicate that the original Custodian's violation of OPRA had a positive element of conscious wrongdoing or was intentional and deliberate. Therefore, the original 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.

Prepared By: Samuel A. Rosado
Staff Attorney

July 24, 2018