



**Minutes of the Government Records Council
December 15, 2015 Public Meeting – Open Session**

I. Public Session:

- **Call to Order**

The meeting was called to order at 1:38 p.m. by Chairwoman Robin Berg Tabakin at the Department of Community Affairs, Conference Room 129, Trenton, New Jersey.

- **Pledge of Allegiance**

All stood and recited the pledge of allegiance in salute to the American flag.

- **Meeting Notice**

Ms. Tabakin read the following Open Public Meetings Act statement:

“This meeting was called pursuant to the provisions of the Open Public Meeting Act. Notices of this meeting were faxed to the Newark Star Ledger (*fax number out of service*), Trenton Times, Courier-Post (Cherry Hill), and the Secretary of State on December 10, 2015.”

Ms. Tabakin read the fire emergency procedure.

- **Roll Call**

Ms. Bordzoe called the roll:

Present: Robin Berg Tabakin (Chairwoman), Dominic Rota, Esq. (designee of Department of Education Commissioner David C. Hespe), Jason Martucci, Esq. (designee of Department of Community Affairs Commissioner Charles A. Richman), and Steven Ritardi, Esq. (Public Member). At the outset of the meeting, Mr. Ritardi joined the meeting telephonically at 1:46 p.m. in order for the Council to have a quorum on the following cases: 2014-205, 2014-230, and 2015-19. Additionally, Mr. Ritardi participated in the approval of the November 2015, minutes, approval of 2016 meeting dates, and 2016 Officer Elections. Mr. Ritardi exited the meeting at 1:51 p.m. after all matters needing the full Council’s participation were addressed.

GRC Staff in Attendance: Joseph Glover (Executive Director), Dawn R. SanFilippo (Deputy Executive Director), Rosemond Bordzoe (Secretary), Frank F. Caruso (Senior Case Manager), John Stewart (Mediator), Samuel Rosado (Staff Attorney), Ernest Bongiovanni (Staff Attorney), Husna Kazmir (Staff Attorney), and Deputy Attorney General Debra Allen.

Ms. Tabakin informed the public that copies of the agenda with complaint summaries are available by the conference room door.

II. Executive Director's Report:

- Since OPRA's inception in calendar year 2002, the GRC has received 4,175 Denial of Access Complaints. That averages a bit over 309 complaints per 13.5 program years.
- In the current program year, the GRC has so far received 202 complaints.
- 445 of the 4,175 complaints remain open and active. Of those open cases,
 - 14 complaints are on appeal with the Appellate Division (3.1%);
 - 15 complaints are currently in mediation (3.4%);
 - 39 complaints await adjudication by the Office of Administrative Law (8.8%);
 - 116 complaints are tentatively scheduled for adjudication at an upcoming GRC meeting, which includes the November 2015 meeting (26%) and
 - 258 complaints are work in progress (58%).
- Since 2004, the GRC has received 24,085 total inquiries. That is an average of about 1,927 inquiries per 12 1/2 tracked program years. So far in the current program year, the GRC has received 964 inquiries.
- In the past 5½ program years, the GRC has received an average of about 387 complaints per year. Prior to that, the average was about 255. With respect to those two periods, the increase is 52%. In the past 2½ program years alone, the GRC has received an average of about 407 complaints per year, representing an increase of 32% over the GRC's yearly average since inception.

III. Closed Session:

Ms. Tabakin read the Closed Session Resolution to go into closed session pursuant to N.J.S.A. 10:4-12(b)(7) to receive legal advice and/or discuss anticipated litigation in which the public body may become a party in the following matters:

- Jeff Carter v. Franklin Township Fire District No. 2 (Somerset) (2011-382)

Mr. Rota made a motion to go into closed session, and Mr. Martucci seconded the motion. The Council adopted the motion by a unanimous vote. The Council met in closed session from 1:58 p.m. until 2:30 p.m. Mr. Rota made a motion to end the closed session, which was seconded by Mr. Martucci. The Council adopted the motion by a unanimous vote.

Open Session reconvened at 2:31 p.m., and Ms. Bordzoe called roll.

Present: Ms. Tabakin, Mr. Rota, and Mr. Martucci; Mr. Ritardi participated telephonically from 1:46 p.m. until 1:51 p.m.

IV. Approval of Minutes of Previous Meetings:

- **November 17, 2015, Open Session Meeting Minutes**

Mr. Rota made a motion, seconded by Mr. Martucci, to approve the open session minutes of the November 17, 2015, meeting. The motion passed by a majority vote; Ms. Tabakin abstained.

- **November 17, 2015, Closed Session Meeting Minutes**

Mr. Rota made a motion, seconded by Mr. Martucci, to approve the closed session minutes of the November 17, 2015, meeting. The motion passed by a majority vote; Ms. Tabakin abstained.

V. Approval of the 2016 meeting dates

Mr. Rota made a motion, seconded by Mr. Martucci, to approve the 2016 meeting dates. The motion passed by a unanimous vote.

VI. 2016 Officer Elections

- Mr. Rota made a motion to re-elect Ms. Tabakin as Chair. Mr. Martucci seconded the motion. The motion passed by majority vote; Ms. Tabakin abstained.
- Mr. Rota made a motion to re-elect Mr. Ritardi as Vice Chair/Secretary. Mr. Martucci seconded the motion. The motion passed by majority vote; Mr. Ritardi abstained.

VII. New Business – Cases Scheduled for Adjudication

Ms. Tabakin stated that an “Administrative Complaint Disposition” means a decision by the Council as to whether to accept or reject the Executive Director’s recommendation of dismissal based on jurisdictional, procedural, or other defects of the complaint. The Executive Director’s recommended reason for the Administrative Disposition is under each complaint below.

A. Administrative Disposition Adjudications with Recusals (Consent Agenda):

The following complaints were presented to the Council for summary administrative adjudication:

1. **Robert Kovacs v. Essex County Department of Corrections (2015-263) (SR Recusal)**
 - No correspondence was received by the Custodian.
2. **John Dupree v. Township of Irvington (Essex) (2015-321) (SR Recusal)**
 - No responsive records exist.

Ms. Tabakin called for a motion to accept the Executive Director’s recommendations as written in both of the above Administrative Complaint Dispositions. Mr. Martucci made a motion, which

was seconded by Mr. Rota. The motion passed by a majority vote. Mr. Ritardi was absent from the vote.

B. Administrative Disposition Adjudications with no Recusals (Consent Agenda):

1. **Brenden Coughlin v. Borough of High Bridge (Hunterdon) (2015-160)**
 - The parties settled the matter through mediation.
2. **Reuben Kramer v. NJ State Police (2015-196)**
 - The parties settled the matter through mediation.
3. **Jeremy Mawhinney v. Township of Galloway Police Department (Atlantic) (2015-278)**
 - The parties settled the matter through mediation.

Ms. Tabakin called for a motion to accept the Executive Director's recommendations as written in all of the above Administrative Complaint Dispositions. Mr. Martucci made a motion, which was seconded by Mr. Rota. The motion passed unanimously.

C. Administrative Disposition of Uncontested, Voluntary Withdrawals by Complainant (No Adjudication of the Council is Required):

1. **Melanie L. Burney v. Somerset County Prosecutor's Office (2014-361)**
2. **Harry B. Scheeler, Jr. v. Township of Hamilton (Atlantic) (2015-54)**
3. **Harry B. Scheeler, Jr. v. Woodbine Board of Education (Cape May) (2015-66)**
4. **Harry B. Scheeler, Jr. v. Woodbine Board of Education (Cape May) (2015-67)**
5. **Robert C. Scutro v. City of Newark (Essex) (2015-86)**
6. **Harry B. Scheeler, Jr. v. Township of Hamilton (Atlantic) (2015-88)**
7. **Harry B. Scheeler, Jr. v. Township of Hamilton (Atlantic) (2015-106)**
8. **Harry B. Scheeler, Jr. v. Township of Hamilton (Atlantic) (2015-125)**
9. **Harry B. Scheeler, Jr. v. Woodbine Board of Education (Cape May) (2015-132)**
10. **Harry B. Scheeler, Jr. v. Township of Hamilton (Atlantic) (2015-151)**
11. **Harry B. Scheeler, Jr. v. Township of Hamilton (Atlantic) (2015-152)**

VIII. New Business – Cases Scheduled for Individual Complaint Adjudication

A. Individual Complaint Adjudications with Recusals:

A short summary of the Executive Director's recommended actions are under each complaint:

1. **Harry B. Scheeler, Jr. v. Woodbine Board of Education (Cape May) (2014-205) (DR Recusal)**
 - The Complainant voluntarily withdrew the complaint subsequent to the Council's Interim Order.
 - Ms. Tabakin called for any discussion on the Executive Director's findings and recommendations as written. Hearing none, Ms. Tabakin called for a motion to accept the Executive Director's findings and recommendations as written. Mr. Martucci

made a motion, and Mr. Ritardi seconded the motion. The motion passed by a majority vote; Mr. Rota recused.

2. **Harry B. Scheeler, Jr. v. Woodbine Board of Education (Cape May) (2014-230) (DR Recusal)**
 - The Complainant voluntarily withdrew the complaint subsequent to the Council's Interim Order.
 - Ms. Tabakin called for any discussion on the Executive Director's findings and recommendations as written. Hearing none, Ms. Tabakin called for a motion to accept the Executive Director's findings and recommendations as written. Mr. Martucci made a motion, and Mr. Ritardi seconded the motion. The motion passed by a majority vote; Mr. Rota recused.

3. **Harry B. Scheeler, Jr. v. NJ Department of Education (2015-19) (DR Recusal)**
 - The Complainant failed to establish valid grounds for reconsideration.
 - Ms. Tabakin called for any discussion on the Executive Director's findings and recommendations as written. Hearing none, Ms. Tabakin called for a motion to accept the Executive Director's findings and recommendations as written. Mr. Martucci made a motion, and Mr. Ritardi seconded the motion. The motion passed by a majority vote; Mr. Rota recused.

4. **John F. Huegel v. County of Essex (2014-305) (SR Recusal)**
 - The Custodian violated OPRA's immediate access provision at N.J.S.A. 47:1A-5e.
 - The matter should be referred to the Office of Administrative Law for a hearing to resolve the facts and a determination as to whether the Custodian knowingly and willfully violated OPRA.
 - Ms. Tabakin called for any discussion on the Executive Director's findings and recommendations as written. Hearing none, Ms. Tabakin called for a motion to accept the Executive Director's findings and recommendations as written. Mr. Rota made a motion, and Mr. Martucci seconded the motion. The motion passed by a majority vote; Mr. Ritardi recused and was absent from the vote.

5. **John F. Huegel v. City of Newark (Essex) (2014-412) (SR Recusal)**
 - The Complainant failed to establish valid grounds for reconsideration.
 - Ms. Tabakin called for any discussion on the Executive Director's findings and recommendations as written. Hearing none, Ms. Tabakin called for a motion to accept the Executive Director's findings and recommendations as written. Mr. Rota made a motion, and Mr. Martucci seconded the motion. The motion passed by a majority vote; Mr. Ritardi recused and was absent from the vote.

6. **G. Harold Christian v. City of Newark (Essex) (2015-11) (SR Recusal)**
 - The Custodian did not bear the burden of proving that he timely responded to the three OPRA requests, thus resulting in "deemed" denials.
 - The Custodian and/or other employees of the City of Newark might have unlawfully denied access to responsive records. Those individuals must therefore

locate and provide any remaining records that are responsive to the requests or otherwise certify that no responsive records exist.

- The Custodian and/or other employees of the City of Newark must provide a detailed explanation of the search conducted to locate responsive records.
- The knowing and willful analysis is deferred pending compliance.
- Ms. Tabakin called for any discussion on the Executive Director's findings and recommendations as written. Hearing none, Ms. Tabakin called for a motion to accept the Executive Director's findings and recommendations as written. Mr. Rota made a motion, and Mr. Martucci seconded the motion. The motion passed by a majority vote; Mr. Ritardi recused and was absent from the vote.

7. **Della Moses Walker v. City of Newark (Essex) (2015-83) (SR Recusal)**

- The Custodian did not bear the burden of proving that he timely responded to the OPRA request, thus resulting in a "deemed" denial.
- The Custodian has borne the burden of proving that he lawfully denied access to the requested report because he certified that no responsive records exist, and the Complainant provided no competent, credible evidence to refute the Custodian's certification.
- Ms. Tabakin called for any discussion on the Executive Director's findings and recommendations as written. Hearing none, Ms. Tabakin called for a motion to accept the Executive Director's findings and recommendations as written. Mr. Rota made a motion, and Mr. Martucci seconded the motion. The motion passed by a majority vote; Mr. Ritardi recused and was absent from the vote.

8. **Susan Noto v. Essex County Register of Deeds and Mortgages (2015-95) (SR Recusal)**

- The Custodian did not bear the burden of proving that he timely responded to the OPRA request, thus resulting in a "deemed" denial.
- An employee of the County of Essex unlawfully denied access to the OPRA request because the Complainant provided sufficient information to allow the agency to locate responsive records.
- The Custodian and/or the other employee must provide electronic access to the responsive records in accordance with N.J.S.A. 47:1A-5b.
- The knowing and willful and prevailing party analyses are deferred pending compliance.
- Ms. Tabakin called for any discussion on the Executive Director's findings and recommendations as written. Hearing none, Ms. Tabakin called for a motion to accept the Executive Director's findings and recommendations as written. Mr. Rota made a motion, and Mr. Martucci seconded the motion. The motion passed by a majority vote; Mr. Ritardi recused and was absent from the vote.

B. Individual Complaint Adjudications with no Recusals:

1. **King Victorious v. NJ Department of Corrections (2014-71)**

- *On advice of legal counsel, the GRC should table the matter.*

- Mr. Martucci made a motion to have this matter tabled, and Mr. Rota seconded the motion. The motion passed unanimously.
2. **Harry B. Scheeler, Jr. v. NJ Office of the Attorney General (2014-236)**
 - The Custodian's response was insufficient pursuant to OPRA's immediate access provision at N.J.S.A. 47:1A-5e.
 - Although the parties do not dispute that the Custodian disclosed the requested records, the Custodian's response was nonetheless legally insufficient because she failed to provide a written response that sets forth a detailed and lawful basis for each redaction. The Custodian must therefore provide to the Complainant the specific lawful basis for each redaction.
 - The knowing and willful analysis is deferred pending the Custodian's compliance.
 - Ms. Tabakin called for any discussion on the Executive Director's findings and recommendations as written. Mr. Caruso stated that edits were made to the proposed recommendations to clarify that the Custodian's response was insufficient. DAG Allen noted that she did not provide legal advice in this case because she was recused from same. Ms. Tabakin called for a motion to accept the Executive Director's finding and recommendations as edited. Mr. Rota made a motion, and Mr. Martucci seconded the motion. The motion passed unanimously.
 3. **Keith B. Kemery v. Gloucester Township Fire District No. 4 (Camden) (2014-290)**
 - The Custodian failed to comply timely with the Council's Interim Order, which required the GRC to make a further demand for compliance. The Custodian did, however, eventually comply with the Interim Order.
 - The Custodian lawfully denied access to the redacted personal e-mail address.
 - The Custodian unlawfully denied access to a redacted name by failing to provide a statutory justification for the redaction.
 - The Custodian must therefore provide the requested records without redacting the name.
 - The knowing and willful analysis is deferred pending the Custodian's compliance.
 - Ms. Tabakin called for any discussion on the Executive Director's findings and recommendations as written. Hearing none, Ms. Tabakin called for a motion to accept the Executive Director's finding and recommendations as written. Mr. Rota made a motion, and Mr. Martucci seconded the motion. The motion passed unanimously.
 4. **Eileen Murphy v. NJ Department of Environmental Protection (2014-293)**
 - The Custodian provided adequate proof that he timely disclosed the responsive records and represented that he will refund the Complainant's payment.
 - The Custodian's compliance obviates the Council's need to conduct an *in camera* review of the remaining records.
 - There is no knowing and willful violation.
 - Ms. Tabakin called for any discussion on the Executive Director's findings and recommendations as written. Hearing none, Ms. Tabakin called for a motion to accept the Executive Director's finding and recommendations as written. Mr.

Rota made a motion, and Mr. Martucci seconded the motion. The motion passed unanimously.

5. **Dennis E. Kleiner v. Ventnor City (Atlantic) (2015-45)**

- The Custodian has not borne the burden of proving that she lawfully denied access to the requested résumé or other certifications of qualification. The Custodian must therefore disclose same to the Complainant, redacted as might be appropriate.
- The Custodian did not unlawfully deny access to the requested RFQ or RFP, as she certified that no responsive records exist, and the Complainant provided no competent, credible evidence to contradict the Custodian's certification.
- The knowing and willful analysis is deferred pending the Custodian's compliance.
- Ms. Tabakin called for any discussion on the Executive Director's findings and recommendations as written. Hearing none, Ms. Tabakin called for a motion to accept the Executive Director's finding and recommendations as written. Mr. Rota made a motion, and Mr. Martucci seconded the motion. The motion passed unanimously.

6. **Chandos F. Caldwell v. Township of East Brunswick (Middlesex) (2015-76)**

- The Complainant has no standing to pursue an action, as he is neither the requestor of the records nor the requestor's legal representative.
- Ms. Tabakin called for any discussion on the Executive Director's findings and recommendations as written. Hearing none, Ms. Tabakin called for a motion to accept the Executive Director's finding and recommendations as written. Mr. Rota made a motion, and Mr. Martucci seconded the motion. The motion passed unanimously.

7. **Harry B. Scheeler, Jr. v. City of Cape May (Cape May) (2015-91)**

- The Custodian's method of "whiting out" the redacted information is not appropriate because it was not a visually obvious method that shows the specific location of redacted material.
- The Custodian must therefore disclose the requested records using a visually obvious method.
- The Custodian has borne the burden of proving that she lawfully denied access to the requested communication because she certified that no responsive records exist, and the Complainant provided no competent, credible evidence to refute the certification.
- Ms. Tabakin called for any discussion on the Executive Director's findings and recommendations as written. Hearing none, Ms. Tabakin called for a motion to accept the Executive Director's finding and recommendations as written. Mr. Rota made a motion, and Mr. Martucci seconded the motion. The motion passed unanimously.

8. **Ronald Long v. NJ Department of Corrections (2015-116)**

- The Custodian has borne the burden of proving that he lawfully denied access to the requested directive because he certified that the records were destroyed

pursuant to existing retention schedules, and the Complainant provided no competent, credible evidence to refute the Custodian's certification.

- Ms. Tabakin called for any discussion on the Executive Director's findings and recommendations as written. Hearing none, Ms. Tabakin called for a motion to accept the Executive Director's finding and recommendations as written. Mr. Rota made a motion, and Mr. Martucci seconded the motion. The motion passed unanimously.

9. **Robert A. Verry v. Township of Greenwich (Warren) (2015-126)**

- The Custodian's failure to respond immediately to the portion of the OPRA request that requires immediate access is a violation of N.J.S.A. 47:1A-5(e).
- The Custodian did not bear the burden of proving that she timely responded to the remainder of the OPRA request, thus resulting in a "deemed" denial.
- The GRC must conduct an *in camera* review of the undisclosed records in order to validate the Custodian's assertions that the withheld records are exempt based on the attorney-client and work product privilege.
- The knowing and willful and prevailing party analyses are deferred pending the Custodian's compliance.
- Ms. Tabakin called for any discussion on the Executive Director's findings and recommendations as written. Hearing none, Ms. Tabakin called for a motion to accept the Executive Director's finding and recommendations as written. Mr. Rota made a motion, and Mr. Martucci seconded the motion. The motion passed unanimously.

10. **Keith Werner v. NJ Department of Treasury (2015-236)**

- The Manager of the Government Records Access Unit complied with the Interim Order by timely forwarding certified confirmation of compliance, and the Custodian's Counsel thereafter disclosed the records.
- The Custodian and/or the Manager violated OPRA by not immediately disclosing records that required immediate access, instead delaying disclosure for a period of time exceeding two months.
- The matter should be referred to the Office of Administrative Law for the limited purpose of determining whether the Custodian and/or the Manager knowingly and willfully violated OPRA.
- Ms. Tabakin called for any discussion on the Executive Director's findings and recommendations as written. Hearing none, Ms. Tabakin called for a motion to accept the Executive Director's finding and recommendations as written. Mr. Rota made a motion, and Mr. Martucci seconded the motion. The motion passed unanimously.

11. **Sean Vandy v. Newfield Police Department (Gloucester) (2015-258)**

- The portions of both OPRA requests that ask questions or seek information are invalid under OPRA because they neither identify nor request public records.
- There was no unlawful denial of access to the requested certification because the Custodian certified that no responsive records exist, and the Complainant provided no competent, credible evidence to refute the certification.

- There was no unlawful denial of access to the requested report because the request provided insufficient identifiers.
- The Custodian's request for clarification was reasonable and proper in light of an overly broad request.
- Ms. Tabakin called for any discussion on the Executive Director's findings and recommendations as written. Hearing none, Ms. Tabakin called for a motion to accept the Executive Director's finding and recommendations as written. Mr. Rota made a motion, and Mr. Martucci seconded the motion. The motion passed unanimously.

VII. Court Decisions of GRC Complaints on Appeal: None

VIII. Complaints Adjudicated in NJ Superior Court & NJ Supreme Court:

- Lagerkvist v. State & Robert McGrath, 2015 N.J. Super. Unpub. LEXIS 2602, (App. Div. 2015): Here, Plaintiff appealed the Law Division's decision, wherein the trial court dismissed his OPRA claim and determined that several records would not be disclosed under the common law right of access.

Although Plaintiff did not dispute the OPRA dismissal on appeal, he did challenge the trial court's common law analysis. This decision is relevant to the Council in that the Court noted that:

While it is true OPRA should not be construed as limiting the common law right of access, N.J.S.A. 47:1A-8; see Educ. Law Ctr. v. N.J. Dep't of Educ., 198 N.J. 274, 302 (2009), a court can still consider OPRA's exemptions in balancing under the common law "as expressions of legislative policy on the subject of confidentiality."

Criminal investigation records are exempt from disclosure under OPRA. N.J.S.A. 47:1A-1.1. Similarly, outside the OPRA context, courts have recognized that the confidentiality of criminal investigatory records is at times crucial to effective law enforcement and that confidentiality may extend even if the investigation is closed. River Edge Sav. & Loan Ass'n v. Hyland, 165 N.J. Super. 540, 543, 545 (App. Div.) (certif. denied, 81 N.J. 58 (1979)). While OPRA does not control the common law public right to access, we find that this OPRA exclusion, and the similar common law principles on the right to access public documents, give guidance to the court when weighing the respective interests of the parties.

Id. at 6.

Based on its balancing test partially implicating the criminal investigatory exemption, the Court affirmed in part, reversed in part, and remanded for consideration by the trial court.

- Varnelas v. Morris Sch. Dist., 2015 N.J. Super. Unpub. LEXIS 2639 (November 17, 2015): Here, the Appellate Division reversed the trial court's decision requiring disclosure of an

investigative file in response to a subpoena and remanded to the trial court for further proceedings.

How this became an OPRA issue is fairly interesting. The Mercer County Prosecutor's Office ("MCPO"), named as a defendant in this case, submitted a motion to quash plaintiffs' subpoena and requested oral argument. The Court surmised that the MCPO attempted to rely on exemptions from OPRA, an argument that the trial court apparently did not find persuasive.

On appeal, MCPO argued, among other things, that the responsive investigative records regarding the adult target of the investigation were exempt as criminal investigatory records. N.J.S.A. 47:1A-1.1. The Court disagreed, noting that OPRA plainly provides that it should not be construed as limiting access to any records under common law, including criminal investigatory records. Id. at 8-9 (citing NJMG, Inc. v. Twp. of Lyndhurst, 441 N.J. Super. 70, 89 (App. Div. 2015)). Further, and most importantly, the Court stated that this case was not based on OPRA, but rather the production of records "in the context of civil litigation. As such, the common law right of access to public records controls its disposition." Id. at 9.

Lexis appears to have updated its bank of unpublished Law Division opinions/orders from years past. The cites are below:

- OR a Student v. Boyco Dir. of Human Res., 2010 N.J. Super. Unpub. LEXIS 3185 (August 2, 2010)(an Order)
- OR a Student v. Hutner, 2010 N.J. Super. Unpub. LEXIS 3192 (August 2, 2010)
- OR v. Gibbs-Nini, 2008 N.J. Super. Unpub. LEXIS 3073 (May 5, 2008)
- Owoh v. W. Windsor Plainsboro Reg'l, 2008 N.J. Super. Unpub. LEXIS 3072 (May 5, 2008)
- OR v. Vict. Kniewel Sch., 2008 N.J. Super. Unpub. LEXIS 3074 (May 5, 2008)

IX. Public Comment:

X. Adjournment:

Mr. Rota made a motion to end the Council's meeting, which was seconded by Mr. Martucci. The motion passed unanimously.

The meeting adjourned at 2:49 p.m.

Respectfully submitted,

Robin Berg Tabakin, Esq., Chair

Date Approved: January 26, 2016